

# Innovation and Governance for Higher Level of Convenience Banking



## Sanggahan dan Batasan Tanggung Jawab

### Disclaimer and Scope of Responsibilities

Laporan Tahunan 2021 PT Bank Victoria International Tbk (yang selanjutnya disebut Bank Victoria atau Bank) ini disusun untuk memenuhi ketentuan pelaporan hasil kinerja Bank pada periode 1 Januari 2021 sampai dengan 31 Desember 2021 kepada regulator dan pemangku kepentingan. Laporan Tahunan ini antara lain disusun berdasarkan Peraturan Otoritas Jasa Keuangan No. 29/POJK.04/2016 tentang Laporan Tahunan Emiten atau Perusahaan Publik dengan muatan konten sesuai Surat Edaran Otoritas Jasa Keuangan No. 16/SEOJK.04/2021 tentang Bentuk dan Isi Laporan Tahunan Emiten atau Perusahaan Publik serta kriteria *Annual Report Award*.

Laporan Tahunan ini memuat pernyataan terkait tujuan, kebijakan, rencana, strategi, serta hasil operasi dan keuangan yang disusun berdasarkan data faktual yang dapat dipertanggungjawabkan kebenarannya. Selain itu, Laporan Tahunan ini juga menyajikan informasi terkait proyeksi kerja Bank di tahun selanjutnya yang disusun berdasarkan pernyataan-pernyataan prospektif dan berbagai asumsi mengenai kondisi mendatang Bank, serta lingkungan bisnis yang terkait, sehingga dapat mengakibatkan perkembangan aktual secara material berbeda dari yang dilaporkan. Oleh karena itu, Bank menghimbau agar pemangku kepentingan dapat menggunakan informasi tersebut secara bijak dalam pengambilan keputusan.

The 2021 Annual Report of PT Bank Victoria International Tbk (hereinafter referred to as Bank Victoria or Bank) was prepared to meet the requirements of reporting the Bank performance results for the period of 1 January 2021 to 31 December 2021 to the regulator and stakeholders. This Annual Report was compiled based on Financial Services Authority Regulation No. 29/POJK.04/2016 on Annual Reports of Issuers or Public Companies with contents in accordance with Financial Services Authority Circular No. 16/SEOJK.04/2021 on the Form and Content of Annual Reports of Issuers or Public Companies, and Annual Report Award criteria.

This Annual Report contains statements related to objectives, policies, plans, strategies, and results of operations and finance compiled based on factual data that is justifiable. In addition, this Annual Report also presents information related to the Bank work projections for the following year compiled based on prospective statements and various assumptions regarding the Bank's future conditions, as well as the related business environment, which may result in actual developments that are materially different from those reported. Therefore, the Bank urges stakeholders to use the information with discretion in their decision making.

# Innovation and Governance for Higher Level of Convenience Banking

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Dalam menghadapi dinamika bisnis dan ketidakpastian ekonomi yang masih berlanjut di tahun 2021, PT Bank Victoria International Tbk mempercepat perubahan dalam memberikan layanan serta menghadirkan produk dan aktivitas baru yang sesuai dengan kebutuhan nasabah. Bank dengan cepat beradaptasi terhadap pola bisnis digital dengan membudayakan *Safe* (keamanan), *Quick* (kecepatan), *Easy* (kemudahan), and *Warm* (kenyamanan dan kedekatan) pada sisi layanan, produk, proses, cara kerja, nuansa, dan lainnya. Transformasi struktural dan fundamental ini disertai dengan upaya mencari sumber pertumbuhan yang sehat dan cepat melalui pengembangan porsi simpanan deposito retail serta peningkatan kualitas kredit pada segmen UKM dan komersial yang dipandang memiliki prospek pertumbuhan yang baik. Strategi ini ditunjang dengan optimalisasi pemanfaatan fitur *Internet Banking and Mobile Banking* (IBMB) serta *Internet Banking Business* (ViBiz) yang telah dimiliki Bank. Seluruh kebijakan dan strategi tersebut diimplementasikan dengan prinsip kehati-hatian serta mempertimbangkan arah pertumbuhan usaha yang berkelanjutan, penerapan tata kelola perusahaan yang baik, serta penciptaan nilai bagi seluruh pemangku kepentingan.

In facing the ongoing business dynamics and economic uncertainty in 2021, PT Bank Victoria International Tbk accelerated its changes in providing services and presenting new products and activities that suit customer needs. The Bank quickly adapts to the digital business patterns by cultivating *Safe* (security), *Quick* (speed), *Easy* (convenience), and *Warm* (comfort and proximity) in terms of services, products, processes, working methods, nuances, and others. This structural and fundamental transformation is supported by efforts to find sources of sound and fast growth through developing retail depositors' portion and improving loan quality in SME and commercial segments which are deemed as having good growth prospects. These strategies are supported by optimizing the utilization of the Bank's *Internet Banking and Mobile Banking* (IBMB) and *Internet Banking Business* (ViBiz) features. All of these policies and strategies are implemented with prudence principles and with due observance to the direction of sustainable business growth, implementation of good corporate governance, and value creation for all stakeholders.

# Kesinambungan Tema

## Theme Sustainability



2020



### Accelerated Changes in the Reinvented Banking

Bank melakukan transformasi digital yang ditunjukkan dengan penyesuaian Nilai-nilai Perusahaan menjadi SQEW (*Safe, Quick, Easy, dan Warm*), yang kemudian diturunkan ke dalam 9 *Digital Culture*. Sesuai dengan Nilai-nilai Perusahaan yang baru tersebut, Bank akan terus membangun dan menyempurnakan platform digital di segala lini, mulai dari *revamping Internet Banking Mobile Banking (IBMB)*, digital *onboarding*, pembaruan *middleware* agar dapat masuk ke ekosistem *e-commerce* dan digital lainnya, *loan origination system*, *cash management*, serta berbagai sistem pembayaran yang terdigitalisasi.

The Bank carried out digital transformation as reflected in the adjustment of Company's Values to SQEW (Safe, Quick, Easy, and Warm) which was then manifested in 9 Digital Culture. According to the Company's new Values, the Bank will continue on developing and improving the digital platform in all lines, starting from revamping Internet Banking Mobile Banking (IBMB), digital onboarding, renewing middleware so that it can enter e-commerce or other digital ecosystem, loan origination system, cash management, and various digitalized payment system.



2019



### Towards Stronger, Resilient and Balanced Growth

Bank Victoria menerapkan berbagai strategi untuk meraih pertumbuhan usaha. Hal ini dilakukan untuk menguatkan struktur permodalan, mengembangkan budaya perusahaan dan budaya pelayanan perbankan yang berbasis teknologi digital, serta mengutamakan pertumbuhan kredit yang sehat dan hati-hati. Fleksibilitas dalam penerapan strategi dilakukan agar pertumbuhan Bank tetap solid di tengah tekanan ekonomi makro dan industri perbankan, baik pertumbuhan dari sisi ekonomi (profitabilitas), maupun pertumbuhan manfaat bagi lingkungan dan sosial.

The Bank implemented various strategies to gain business growth. This was carried out in order to strengthen the capital structure, to develop corporate culture and digitech banking service culture, and to prioritize a sound and prudent credit growth. The strategy is implemented in a flexible manner so that the Bank's growth remains solid in the midst of macroeconomic and banking industry pressures, in terms of economic growth (profitability), and environmental and social benefit growth.



2018



### Enhancing Banking Service of Excellence

Bank Victoria melakukan transformasi bisnis dengan tujuan untuk meningkatkan layanan keunggulan Bank yang dilakukan melalui 4 (empat) pendekatan, yaitu Budaya Kerja, Kualitas Aset, Pertumbuhan, Berkesinambungan, serta Aliansi dan Transaksi Perbankan.

Bank Victoria performed business transformation with the intention of enhancing the Bank's predominant services, which is carried out through 4 (four) approaches, ie. Work Culture, Assets Quality, Growth, Sustainability, and Banking Alliance and Transaction.



## 2017



### Continuous Improvement Towards Sustainable Growth

Mengupayakan pertumbuhan secara hati-hati dan kompetitif yang didukung oleh perluasan segmen bisnis perbankan yang dijalankan, yakni dengan beroperasinya Bank Victoria sebagai bank devisa.

Pursuing prudent and competitive growth supported by the expansion of the course of banking business segment, namely through Bank Victoria's operational as a foreign exchange bank.



## 2016



### Sustainable Asset Quality Growth

Menetapkan strategi-strategi kunci untuk mencapai pertumbuhan kualitas aset yang berkelanjutan, yakni melalui pengelolaan penyaluran kredit dan penghimpunan dana pihak ketiga.

Establishing key strategies to achieve sustainable asset quality growth, namely through the management of lending distribution and third-party funding.

# Sekilas tentang Bank Victoria

## Bank Victoria Overview

**Jaringan Kantor  
Operasional**  
Operational Offices  
Network

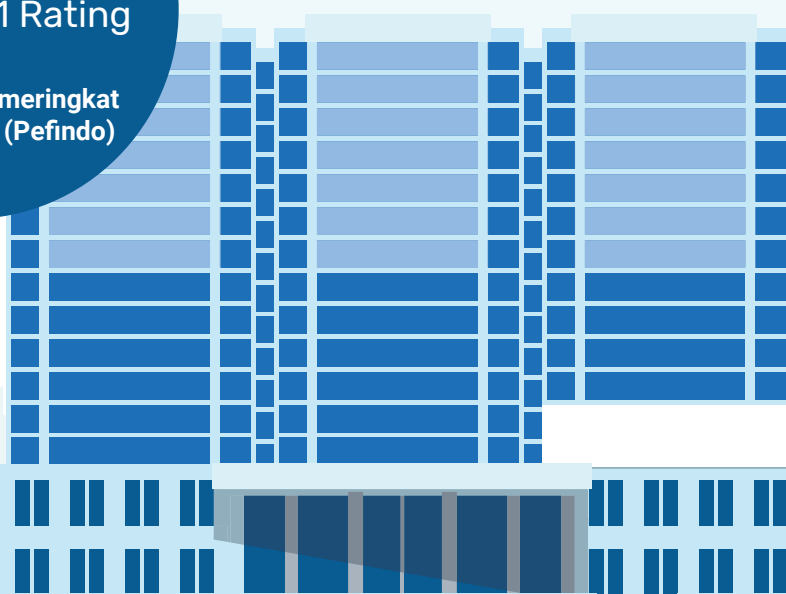
**39**



**Peringkat Bank  
2021**

Bank's 2021 Rating

idA-  
oleh / by PT Pemeringkat  
Efek Indonesia (Pefindo)



### Budaya Perusahaan / Company's Culture



**SAFE**



**QUICK**

1

**Entitas Anak**  
Subsidiary

2

**Segmen Usaha**  
Business Segments



**Segmen Konvensional**  
Conventional Segment



**Segmen Syariah**  
Sharia Segment

bank  victoria



694

**Karyawan**  
Employees



326

**Karyawan Wanita**  
Female Employees

E

EASY

W

WARM

# Pencapaian Penting 2021

Significant Achievement in 2021

## Konsolidasi Consolidated





## Entitas Induk (Bank Victoria) Parent Entity (Victoria Bank)



# Keunggulan Kompetitif Bank Victoria

## Competitive Advantages of Bank Victoria

39

JARINGAN KANTOR  
Operational Office



bank  victoria



### Memiliki 39 Jaringan Kantor Operasional yang Berfokus pada Penetrasi Pasar

Having 39 Operational Office Network that Focuses on Market Penetration

Sampai dengan saat ini, Bank Victoria telah melakukan ekspansi di beberapa wilayah di Indonesia, terutama Jabotabek, Bandung, Surabaya, Manado, Makassar, Bali, Semarang, Solo, dan Medan. Hal ini merupakan bentuk maksimalisasi perluasan bisnis dan jaringan Bank Victoria.

Until now, Bank Victoria has expanded in several regions in Indonesia, especially Jabotabek, Bandung, Surabaya, Manado, Makassar, Bali, Semarang, Solo, and Medan. This is a form of maximizing Bank Victoria's business and network expansion.



### Memiliki Tingkat Kecukupan Modal yang Kuat

Having Strong Capital Adequacy

Bank Victoria memiliki tingkat kecukupan modal (*capital adequacy ratio/CAR*) yang kuat, sehingga mampu menopang pertumbuhan portofolio kredit yang berkualitas. Bank Victoria juga meningkatkan CAR secara berkala untuk menjaga dan mengelola permodalan agar tetap sehat.

Bank Victoria has strong capital adequacy ratio/CAR, and therefore, can support quality growth of credit portfolio. Bank Victoria also increases its CAR periodically to maintain and manage its capital to be in a sound level.



### Memiliki Potensi Sinergi dan Saling Menguntungkan dengan Seluruh Grup Usaha dan Entitas Anak

Potential Synergy and Mutual Benefits with All Business Groups and Subsidiaries



Bank Victoria terus melakukan inovasi produk dan layanan finansial bagi nasabah, baik melalui Entitas Anak maupun secara individu melalui kerja sama dengan perusahaan saudara dalam Grup Victoria. Pada tahun 2021, Bank Victoria meluncurkan produk dan pengembangan aktivitas baru yang beragam untuk mendukung ekspansi bisnis khususnya *retail banking*.

Bank Victoria keeps making product innovation and financial services for customers, either through Subsidiaries or individually, through cooperation with its sister companies within the Victoria Group. In 2021, Bank Victoria launched various new products and development to support the business expansion, especially in retail banking.



### Menerapkan *Good Personal Customer Relation Approach* (*Relationship Banking*)

Implementing the Good Personal Customer Relation Approach (*Relationship Banking*)

Kepuasan nasabah menjadi faktor penting bagi Bank Victoria. Hal ini diharapkan dapat menjadi pendorong utama, sehingga mempunyai *customer base loyal*, yang pada akhirnya mampu memberikan dampak yang positif dan berpengaruh signifikan bagi kelangsungan usaha Bank Victoria, baik dalam jangka pendek maupun panjang.

Customer satisfaction is an important factor for Bank Victoria. This matter is expected to be the main driver, to have a loyal customer base, which eventually can give a positive impact and a significant effect on Bank Victoria's business continuity, both in the short and long term.

### Manajemen yang Kuat, Berpengalaman dan Berdedikasi dengan Visi dan Misi Baru, serta Memiliki Komitmen Tinggi pada Peningkatan Penerapan GCG

Strong, Experienced, and Dedicated Management with New Vision and Mission, as well as High Commitment on Improving GCG implementation

Bank Victoria membangun manajemen yang kuat dalam mendukung Visi dan Misi Bank untuk menjadi bank pilihan nasabah yang terpercaya, sehat dan efisien. Bank Victoria juga mewujudkan komitmen penuh dalam menerapkan prinsip GCG.

Bank Victoria builds strong management in supporting the Bank's Vision and Mission to become customers' preferred Bank, which is trustworthy, sound, and efficient. Bank Victoria also realizes its full commitment in implementing GCG principles.



# Kilas Kinerja

Performance Highlights



**Total Rekening Dana Pihak Ketiga**  
Total Accounts of Third-Party Funds

2021 : **66,068**  
2020 : 76,635

↓ 13.79%



**Total Rekening Tabungan**  
Total Savings Accounts

2021 : **45,057**  
2020 : 52,963

↓ 14.93%



**Total Rekening Giro**  
Total Current Accounts

2021 : **2,508**  
2020 : 2,552

↓ 1.72%



**Total Rekening Deposito Berjangka**  
Total Accounts of Time Deposits

2021 : **18,503**  
2020 : 21,120

↓ 12.39%



# Ikhtisar Keuangan

## Financial Highlights

(dalam juta Rupiah / in million Rupiah)

Uraian	2021	2020	2019	2018	2017	Description
<b>LAPORAN POSISI KEUANGAN KONSOLIDASIAN / CONSOLIDATED STATEMENTS OF FINANCIAL POSITION</b>						
<b>Aset</b>						<b>Assets</b>
Kas	53,929	61,723	40,656	57,676	72,142	Cash
Giro pada Bank Indonesia	663,114	612,623	1,810,636	1,551,075	1,768,561	Current accounts with Bank Indonesia
Giro pada bank lain	405,667	184,921	125,446	91,962	75,231	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank lain	762,366	1,692,225	306,638	2,401,787	2,114,573	Placements with Bank Indonesia and other banks
Efek-efek	5,186,595	6,416,334	7,911,480	6,797,478	7,930,092	Marketable securities
Dikurangi: Cadangan kerugian penurunan nilai	(11,109)	(9,663)	(11,240)	(72,957)	(32,309)	Less: Allowance for impairment losses
Efek-efek yang dibeli dengan janji dijual kembali	690,715	447,805	1,000,006	1,000,011	-	Securities purchased under resale agreement
Pendapatan bunga dan syariah yang masih akan diterima	364,694	248,240	192,745	189,997	221,739	Interest and sharia income receivables
Biaya dibayar dimuka	14,455	21,000	25,669	21,404	19,862	Prepaid expenses
Pinjaman yang diberikan, pembiayaan dan piutang syariah						Loans, sharia financing and receivables
Pihak berelasi	219,052	237,416	246,157	84,330	87,999	Related parties
Pihak ketiga	15,270,022	14,605,938	17,193,963	16,309,266	15,743,265	Third parties
Dikurangi: Cadangan kerugian penurunan nilai	(702,274)	(597,378)	(385,381)	(290,825)	(254,577)	Less: Allowance for impairment losses
Tagihan akseptasi	-	-	66,543	164,547	117,881	Acceptance receivable
Penyertaan saham	34,887	57,368	86,226	60	60	Investments in shares
Dikurangi: Cadangan kerugian penurunan nilai	(0)	(0)	(1)	0	0	Less: Allowance for impairment losses
Agunan yang diambil alih	1,436,698	1,645,774	1,273,552	1,211,740	374,764	Foreclosed assets
Dikurangi: Cadangan kerugian penurunan nilai	(282,641)	(278,062)	(168,345)	(157,720)	(87,126)	Less: Allowance for impairment losses
Aset pajak tangguhan – neto	302,389	250,489	162,298	172,902	90,404	Deferred tax assets - net
Aset tetap dan aset hak guna	599,482	624,163	588,789	595,089	568,733	Fixed Assets and Right-of-Use Assets
Dikurangi: Akumulasi penyusutan	(91,362)	(64,490)	(67,053)	(53,805)	(40,731)	Less: Accumulated depreciation
Aset tidak berwujud – neto	3,194	5,071	7,546	8,654	6,037	Intangible assets - net
Aset lain-lain	62,118	70,683	51,800	89,645	49,009	Other assets
Dikurangi: Cadangan kerugian penurunan nilai	(34,848)	(10,773)	(1,672)	-	-	Less: Allowance for impairment losses
<b>Total Aset</b>	<b>24,947,143</b>	<b>26,221,407</b>	<b>30,456,459</b>	<b>30,172,315</b>	<b>28,825,609</b>	<b>Total Assets</b>
<b>LIABILITAS, DANA SYIRKAH TEMPORER, DAN EKUITAS / LIABILITIES, TEMPORARY SYIRKAH FUNDS, AND EQUITY</b>						
<b>Liabilitas</b>						<b>Liabilities</b>
Liabilitas segera	336	2,087	2,077	4,393	4,495	Obligations due immediately
Simpanan nasabah						Deposits from customers
Pihak berelasi	712,301	273,543	474,612	182,766	167,376	Related parties
Pihak ketiga	17,372,571	18,057,886	21,317,025	20,453,615	20,607,596	Third parties



Uraian	2021	2020	2019	2018	2017	Description
Simpanan dari bank lain						Deposits from other banks
Pihak ketiga	1,037,173	2,060,970	909,310	1,835,799	2,236,882	Third parties
Efek-efek yang dijual dengan janji dibeli kembali	-	-	1,000,001	1,302,664	-	Securities sold under repurchase agreements
Utang akseptasi	-	-	49,006	161,198	77,660	Acceptance payable
Efek-efek yang diterbitkan	1,348,520	1,544,029	1,780,135	1,585,723	1,140,423	Securities issued
Pinjaman dari bank lain	50,000	-	-	-	-	Loans from other banks
Utang pajak						Taxes payable
Pajak penghasilan badan	-	-	207	36,747	15,757	Corporate income tax
Pajak lainnya	12,585	21,619	29,770	28,584	26,212	Other taxes
Liabilitas imbalan kerja karyawan	43,884	58,499	65,755	73,622	76,385	Employee benefits obligation
Akrual dan liabilitas lain-lain	124,855	179,217	154,416	143,460	131,190	Accruals and other liabilities
<b>Total Liabilitas</b>	<b>20,702,226</b>	<b>22,197,850</b>	<b>25,782,314</b>	<b>25,808,570</b>	<b>24,483,975</b>	<b>Total Liabilities</b>
<b>Dana Syirkah Temporer</b>						<b>Temporary Syirkah Fund</b>
Simpanan nasabah						Deposits from customers
Pihak berelasi	3,293	2,932	25,263	27,577	2,708	Related parties
Pihak ketiga	1,218,699	1,321,750	1,480,927	1,422,443	1,470,980	Third parties
Simpanan bank lain						Deposits from other banks
Pihak ketiga	8,500	54,500	181,500	107,700	21,600	Third parties
<b>Total Dana Syirkah Temporer</b>	<b>1,230,492</b>	<b>1,379,182</b>	<b>1,687,690</b>	<b>1,557,720</b>	<b>1,495,288</b>	<b>Total Temporary Syirkah Fund</b>
<b>Ekuitas</b>						<b>Equity</b>
Modal saham	1,048,713	895,195	895,195	867,105	867,105	Share capital
Tambahan modal disetor	407,786	282,775	282,775	211,681	211,681	Additional paid-in capital
Setoran modal diterima dimuka	278,000	-	-	-	-	Capital subscribed in advance
Keuntungan/(kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	18,283	94,219	30,500	(58,235)	69,692	Unrealised gain/(loss) on changes in fair value of marketable securities measured at fair value through other comprehensive income, net of tax
Surplus revaluasi aset tetap, setelah pajak	382,456	375,372	339,336	355,459	355,459	Gain on revaluation of fixed assets, net of tax
Pengukuran kembali atas liabilitas imbalan kerja, setelah pajak	20,973	19,536	19,107	12,833	-	Remeasurements on employee benefit liabilities, net of tax
Saldo laba						Retained earnings
Telah ditentukan penggunaannya	186,356	186,356	186,356	175,156	150,156	Appropriated
Belum ditentukan penggunaannya	671,840	790,904	1,233,168	1,242,010	1,192,235	Unappropriated
Keentingan nonpengendali	17	18	17	16	18	Non-controlling interest
<b>Total Ekuitas</b>	<b>3,014,425</b>	<b>2,644,375</b>	<b>2,986,455</b>	<b>2,806,025</b>	<b>2,846,346</b>	<b>Total Equity</b>
<b>Total Liabilitas, Dana Syirkah Temporer, dan Ekuitas</b>	<b>24,947,143</b>	<b>26,221,407</b>	<b>30,456,459</b>	<b>30,172,315</b>	<b>28,825,609</b>	<b>Total Liabilities, Temporary Syirkah Fund, and Equity</b>

Uraian	2021	2020	2019	2018	2017	Description
<b>LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN KONSOLIDASIAN / CONSOLIDATED STATEMENTS OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME</b>						
Pendapatan bunga dan syariah	1,612,210	1,790,640	2,223,205	2,280,213	2,292,718	Interest and sharia income
Beban bunga dan syariah	(1,148,556)	(1,600,982)	(1,954,057)	(1,820,882)	(1,835,041)	Interest and sharia expenses
Pendapatan bunga dan syariah – bersih	463,654	189,658	269,148	459,331	457,677	Interest and sharia income - net
Pendapatan operasional lainnya	453,929	491,005	362,155	378,889	416,596	Other operating income
Beban operasional lainnya	(1,004,569)	(928,353)	(648,357)	(741,052)	(736,193)	Other operating expenses
(Rugi)/laba operasional	(86,985)	(247,689)	(17,054)	97,168	138,080	(Loss)/income from operations
Beban non-operasional – neto	(63,883)	(50,543)	(7,672)	(3,808)	38,057	Non-operating expense - net
(Rugi)/laba sebelum beban pajak penghasilan	(150,868)	(298,233)	(24,725)	93,360	176,137	(Loss)/income before income tax expense
Manfaat/(beban) pajak penghasilan – neto	31,805	46,039	10,961	(14,278)	(40,047)	Benefit/(Expense) - net
(Rugi)/laba bersih yang dapat diatribusikan kepada:	(119,063)	(252,194)	(13,765)	79,082	136,091	Net (loss)/income attributable to:
Pemilik Entitas Induk	(119,063)	(252,194)	(13,765)	79,082	136,090	Equity holders of the Parent Entity
Kepentingan non-pengendali	0	(0)	0	0	1	Non-controlling interest
(Rugi)/Penghasilan komprehensif lain, setelah pajak penghasilan	(67,416)	100,185	95,010	(119,418)	83,984	(Loss)/other comprehensive income, net of income tax
(Rugi)/laba komprehensif yang dapat diatribusikan kepada:	(186,479)	(152,009)	81,245	(40,336)	220,075	Comprehensive (loss)/income attributable to:
Pemilik Entitas Induk	(186,478)	(152,010)	81,244	(40,334)	220,075	Equity holders of the Parent Entity
Kepentingan non-pengendali	(1)	1	1	(2)	0	Non-controlling interest
(Rugi)/laba bersih per saham yang dapat diatribusikan kepada pemilik Entitas Induk						(Loss)/earnings per share attributable to entity holders of the Parent Entity
Dasar (Rupiah penuh)	(12.90)	(28.17)	(1.56)	9.12	15.69	Basic (whole Rupiah)
Dilusian (Rupiah penuh)	(12.90)	(28.17)	(1.56)	9.12	15.69	Diluted (whole Rupiah)
<b>LAPORAN ARUS KAS KONSOLIDASIAN / CONSOLIDATED STATEMENTS OF CASH FLOWS FOR THE YEARS ENDED</b>						
Arus kas bersih (digunakan untuk)/diperoleh dari aktivitas operasi	(2,246,858)	22,084	(1,144,408)	(1,343,241)	1,408,519	Net cash flow (used in)/provided from operating activities
Arus kas bersih diperoleh dari/(digunakan untuk) aktivitas investasi	1,233,396	587,853	(917,296)	1,150,586	(495,577)	Net cash flows provided from/(used in) investing activities
Arus kas bersih diperoleh dari/(digunakan untuk) aktivitas pendanaan	395,586	(251,237)	299,184	450,000	250,000	Net cash flows provided from/(used in) financing activities
(Penurunan)/kenaikan bersih kas dan setara kas	(617,876)	358,700	(1,762,519)	257,346	1,162,942	Net (decrease)/increase of cash and cash equivalents
Kas dan setara kas pada awal tahun	2,504,438	2,145,739	3,908,258	3,650,912	2,487,970	Cash and cash equivalents at beginning of year
Kas dan setara kas pada akhir tahun	1,886,562	2,504,438	2,145,739	3,908,258	3,650,912	Cash and cash equivalents at end of year
<b>RASIO KEUANGAN* / FINANCIAL RATIOS* (dalam / in %)</b>						
<b>Permodalan</b>						<b>Capital</b>
KPMM dengan memperhitungkan risiko kredit dan operasional	17.92	17.39	17.76	16.98	18.76	CAR by calculating credit and operational risk
KPMM dengan memperhitungkan risiko kredit, operasional, dan pasar	17.49	16.68	17.29	16.73	18.17	CAR by calculating credit, operational, and market risk
Aktiva tetap terhadap modal	17.32	19.26	15.74	17.90	18.05	Fixed assets to capital



Uraian	2021	2020	2019	2018	2017	Description
<b>Aset Produktif</b>						<b>Earning Assets</b>
Aset produktif dan non-produktif bermasalah terhadap total aset produktif dan non-produktif	<b>8.23</b>	5.82	6.30	2.36	2.94	Non-performing earning assets and non-earning assets to total earning assets and non-earning assets
Aset produktif bermasalah terhadap total aset produktif	<b>5.02</b>	4.90	4.42	2.10	1.86	Non-performing earning assets to total earning assets
CKPN aset keuangan terhadap aset produktif	<b>3.13</b>	2.71	1.48	1.38	1.16	Allowance for impairment losses of financial assets to earning assets
Pemenuhan CKPN aset produktif	<b>202.01</b>	107.09	106.26	106.90	83.73	Allowance for impairment losses fulfillment of earning assets
NPL bruto	<b>7.27</b>	7.58	6.77	3.48	3.05	Gross NPL
NPL neto	<b>4.08</b>	4.91	4.96	1.90	2.32	Net NPL
<b>Profitabilitas</b>						<b>Profitability</b>
ROA	<b>(0.71)</b>	(1.26)	(0.09)	0.33	0.64	ROA
ROE	<b>(6.54)</b>	(12.74)	(0.57)	3.41	5.52	ROE
NIM	<b>2.36</b>	0.82	1.07	1.82	2.13	NIM
BOPO	<b>104.94</b>	112.09	100.69	100.24	94.53	BOPO
Rasio laba (rugi) terhadap total aset	<b>(0.50)</b>	(1.04)	(0.05)	0.28	0.48	Income (loss) to total assets ratio
Rasio laba (rugi) terhadap total ekuitas	<b>(3.95)</b>	(9.63)	(0.46)	2.81	4.62	Income (loss) to total equity ratio
Rasio laba (rugi) terhadap pendapatan bunga	<b>(7.95)</b>	(15.36)	(0.67)	3.75	6.13	Income (loss) to interest income
Rasio liabilitas terhadap total aset	<b>87.27</b>	89.22	89.54	90.06	89.52	Liabilities to total assets ratio
Rasio liabilitas terhadap total ekuitas	<b>685.77</b>	827.46	856.22	906.29	854.52	Liabilities to total equity ratio
<b>Likuiditas</b>						<b>Liquidity</b>
LDR	<b>81.25</b>	75.64	74.46	73.61	70.25	LDR
LFR	<b>79.89</b>	73.97	72.84	72.32	69.65	LFR
Rasio aktiva keuangan terhadap liabilitas keuangan	<b>119.85</b>	108.59	111.47	108.99	108.41	Financial assets to financial liabilities ratio
<b>Kepatuhan</b>						<b>Compliance</b>
Persentase pelanggaran BMPK						Percentage of LLL violation
Pihak terkait	<b>0.00</b>	0.00	0.00	0.00	0.00	Related parties
Pihak tidak terkait	<b>0.00</b>	0.00	0.00	0.00	0.00	Non-related parties
Persentase pelampauan BMPK						Percentage of LLL excess
Pihak terkait	<b>0.00</b>	0.00	0.00	0.00	0.00	Related parties
Pihak tidak terkait	<b>0.00</b>	0.57	0.00	0.00	0.00	Non-related parties
GWM primer – Rupiah	<b>3.57</b>	3.06	7.79	7.26	7.97	Primary minimum reserve requirements - Rupiah
GWM primer – Valas	<b>4.05</b>	4.05	8.05	8.09	8.97	Secondary minimum reserve requirements – Foreign Exchange
GWM sekunder – Rupiah	<b>14.97</b>	12.57	13.03	13.84	17.37	Secondary minimum reserve requirements - Rupiah
Posisi devisa neto (PDN) secara keseluruhan	<b>0.98</b>	0.17	0.29	0.47	0.07	Net open position (NOP) in overall

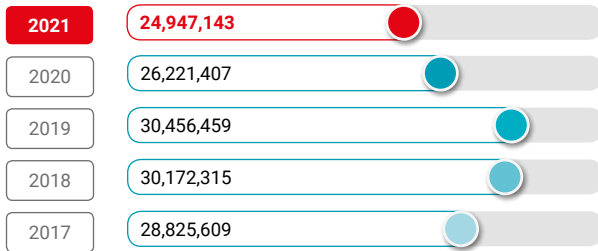
\* Merupakan angka PT Bank Victoria International Tbk (induk saja).

\* The figure is for PT Bank Victoria International Tbk (parent only).

### TOTAL ASET

Total Assets

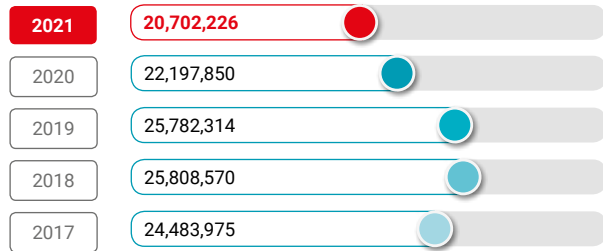
(dalam juta Rupiah / in million Rupiah)



### TOTAL LIABILITAS

Total Liabilities

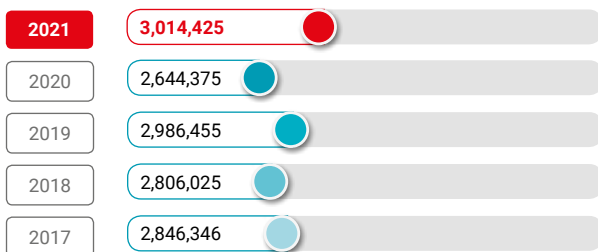
(dalam juta Rupiah / in million Rupiah)



### TOTAL EKUITAS

Total Equity

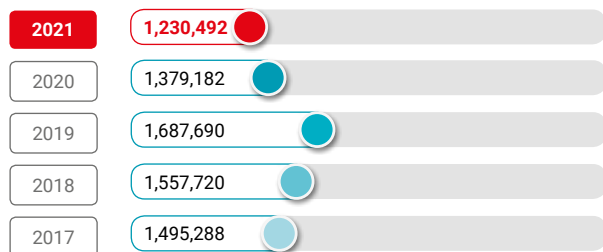
(dalam juta Rupiah / in million Rupiah)



### TOTAL DANA SYIRKAH TEMPORER

Total Temporary Syirkah Fund

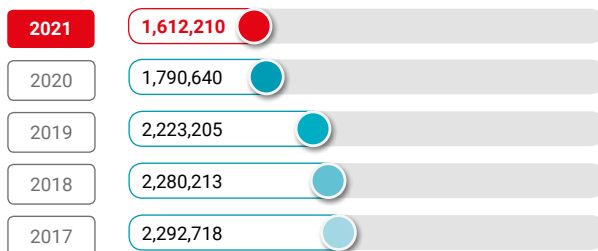
(dalam juta Rupiah / in million Rupiah)



### PENDAPATAN BUNGA DAN SYARIAH

Interest and Sharia Income

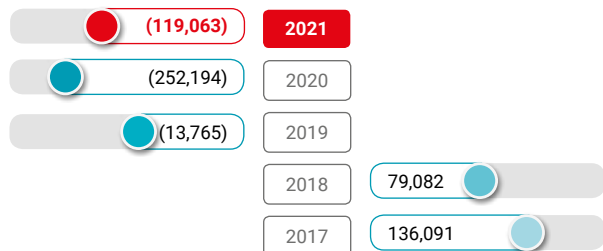
(dalam juta Rupiah / in million Rupiah)



### (RUGI)/LABA TAHUN BERJALAN

(Loss)/Profit for the Year

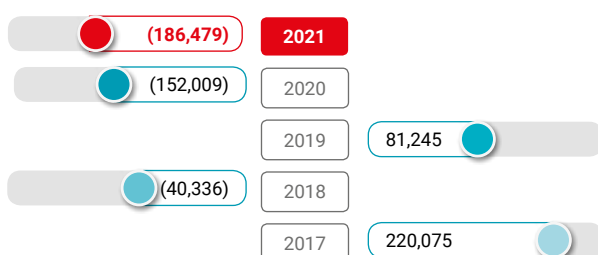
(dalam juta Rupiah / in million Rupiah)



### (RUGI)/LABA KOMPREHENSIF TAHUN BERJALAN

Comprehensive Net/(Loss) of the Year

(dalam juta Rupiah / in million Rupiah)



### (RUGI)/LABA PER SAHAM DASAR

Basic (Loss)/Earnings per Share

(dalam Rupiah penuh / in full Rupiah)



## Ikhtisar Operasional

### Operational Highlights

Uraian	2021	2020	2019	2018	2017	Description
<b>PRODUK SIMPANAN* / DEPOSIT PRODUCTS*</b> (dalam unit rekening / in account unit)						
Tabungan	45,057	52,963	67,639	70,558	70,504	Saving deposits
Giro	2,508	2,552	2,535	2,306	2,373	Current accounts
Deposito berjangka	18,503	21,120	25,333	24,187	25,364	Time deposits
<b>Total</b>	<b>66,068</b>	<b>76,635</b>	<b>95,507</b>	<b>97,051</b>	<b>98,241</b>	<b>Total</b>
<b>PRODUK PINJAMAN / LOAN PRODUCTS</b> (dalam juta Rupiah / in million Rupiah)						
Pinjaman tetap	9,336,405	10,289,271	11,107,487	10,558,486	9,223,073	Fixed loans
Pinjaman konsumen	161,842	194,651	234,595	299,260	396,336	Consumer loans
Pinjaman rekening koran	1,510,730	1,026,066	1,112,021	973,885	889,565	Overdraft loans
Pinjaman tetap dengan angsuran	3,627,712	2,103,021	3,661,516	3,273,986	3,980,405	Fixed loans with installments
Pinjaman serba guna	46,416	63,373	92,886	53,409	78,889	Multipurpose loans
Pinjaman tanpa agunan	-	-	-	-	71	Other loans
Pembiayaan syariah	805,969	1,166,972	1,231,614	1,234,571	1,262,926	Sharia financing
<b>Total</b>	<b>15,489,074</b>	<b>14,843,355</b>	<b>17,440,120</b>	<b>16,393,596</b>	<b>15,831,264</b>	<b>Total</b>

\* Merupakan angka PT Bank Victoria International Tbk (induk saja). / The figure is for PT Bank Victoria International Tbk (parent only).

## Informasi Lainnya

### Other Information

Uraian	2021	2020	2019	2018	2017	Description
<b>JARINGAN KANTOR / OFFICE NETWORK</b> (dalam / in unit)						
Kantor pusat	1	1	1	1	1	Head office
Kantor cabang	14	14	14	12	9	Branch offices
Kantor cabang pembantu	25	38	63	65	68	Sub-branch offices
Jaringan kantor lain (kantor kas, payment point, dan lainnya)	-	1	8	15	28	Other office network (cash office, payment point, and others)
<b>KARYAWAN / EMPLOYEES</b>						
Pria	368	414	496	520	552	Male
Wanita	326	385	518	524	555	Female

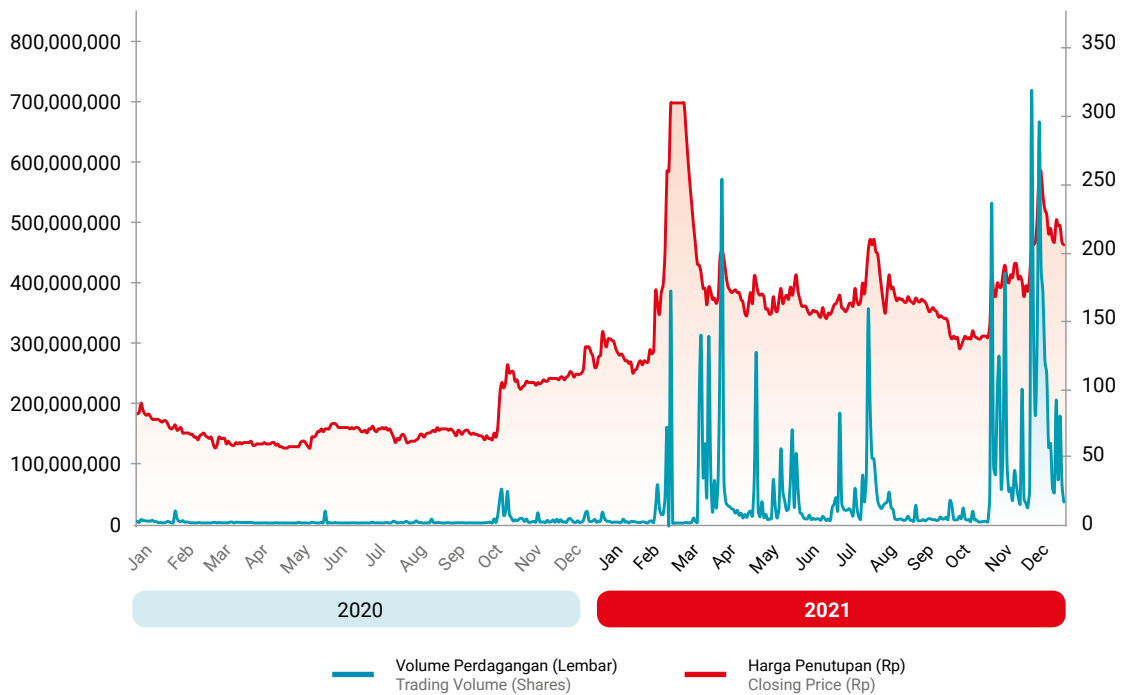
# Ikhtisar Saham

## Share Highlights

Periode Period	Harga Pembukaan Opening Price (Rp)	Harga Terendah Lowest Price (Rp)	Harga Tertinggi Highest Price (Rp)	Harga Penutupan Closing Price (Rp)	Volume Perdagangan (Lembar) Trading Volume (Shares)	Jumlah Saham Beredar (Lembar) Total Outstanding Shares (Shares)	Kapitalisasi Pasar Market Capitalization (Rp)
<b>2021</b>							
Triwulan I Quarter I	113	103	308	173	32,297,303	8,951,947,039	1,548,686,837,747
Triwulan II Quarter II	170	146	238	151	49,002,288	9,538,152,978	1,440,261,099,678
Triwulan III Quarter III	160	148	222	152	33,479,445	9,538,152,978	1,449,799,252,656
Triwulan IV Quarter IV	151	120	276	204	116,465,538	10,487,132,568	2,139,375,043,872
<b>2020</b>							
Triwulan I Quarter I	57	57	58	57	107,238,800	8,951,947,039	510,260,981,223
Triwulan II Quarter II	67	66	69	68	31,883,800	8,951,947,039	608,732,398,652
Triwulan III Quarter III	64	63	65	63	42,292,500	8,951,947,039	563,972,663,457
Triwulan IV Quarter IV	122	114	125	114	421,586,100	8,951,947,039	1,020,521,962,446

Volume Perdagangan (Lembar)  
Trading Volume (Shares)

Harga Penutupan (Rp)  
Closing Price (Rp)



## Aksi Korporasi

Pada 6 Mei 2021, Bank Victoria telah melakukan penerbitan saham melalui Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) sebanyak 586.205.939 lembar saham dengan harga pelaksanaan sebesar Rp160,- per saham atau seluruhnya sejumlah Rp93.792.950.240,-. Pelaksanaan aksi korporasi tersebut telah dicatatkan di Bursa Efek Indonesia pada 7 Mei 2021.

Berikut komposisi dan struktur permodalan Bank Victoria sebelum dan setelah dilaksanakan PMTHMETD.

Uraian Description	Sebelum Penambahan Modal Before Capital Addition			Setelah Penambahan Modal Per tanggal 7 Mei 2021 After Capital Addition per 7 May 2021		
	Jumlah Saham Beredar (Lembar Saham) Total Outstanding Shares (Number of Shares)	Nilai Nominal Saham @Rp100 per Saham Share Par Value @Rp100 per Share (Rp)	Kepemilikan Saham Share Ownership (%)	Jumlah Saham Beredar (Lembar Saham) Total Outstanding Shares (Number of Shares)	Nilai Nominal Saham @Rp100 per Saham Share Par Value @Rp100 per Share (Rp)	Kepemilikan Saham Share Ownership (%)
PT Victoria Investama Tbk	4,094,737,242	409,473,724,200	45.74	4,157,237,242	415,723,724,200	43.59
Suzanna Tanojo	1,538,152,114	153,815,211,400	17.18	1,538,152,114	153,815,211,400	16.13
DEG-Deutsche Investitions -Und Entwicklungsgesellschaft MbH	780,394,335	78,039,433,500	8.72	780,394,335	78,039,433,500	8.18
PT Nata Patindo	395,484,865	39,548,486,500	4.42	395,484,865	39,548,486,500	4.15
Masyarakat (masing-masing kepemilikan di bawah 5%) Public (each shareholding below 5%)	2,143,178,483	214,317,848,300	23.94	2,666,884,422	266,688,442,200	27.96
<b>Jumlah Modal Ditempatkan dan Disetor</b> Total Subscribed and Paid-up Capital	<b>8,951,947,039</b>	<b>895,194,703,900</b>	<b>100.00</b>	<b>9,538,152,978</b>	<b>953,815,297,800</b>	<b>100.00</b>

Selanjutnya pada 10 Desember 2021, Bank Victoria melakukan penerbitan PMTHMETD sebanyak 948.979.590 lembar saham dengan harga pelaksanaan sebesar Rp196,- setiap sahamnya atau seluruhnya sejumlah Rp185.999.999.640,- dan telah dicatatkan di Bursa Efek Indonesia pada 13 Desember 2021.

## Corporate Action

On 6 May 2021, Bank Victoria issued 586,205,939 shares through Capital Addition Without Pre-Emptive Rights with exercise price at Rp160 per share or a total of Rp Rp93,792,950,240. The execution of such corporate action was listed on Indonesia Stock Exchange on 7 May 2021.

The following is Bank Victoria's capital composition and structure before and after the Capital Addition Without Pre-Emptive Rights.

Thereafter, on 10 December 2021, Bank Vitoria issued 948,979,590 shares through Capital Addition Without Pre-Emptive Rights with execution price at Rp196 per share or a total of Rp185,999,999,640, which was listed on the Indonesia Stock Exchange on 13 December 2021.

Berikut komposisi dan struktur permodalan Bank Victoria sebelum dan setelah dilaksanakan PMTHMETD.

The following is Bank Victoria's capital composition and structure before and after the Capital Addition Without Pre-Emptive Rights.

Uraian Description	Sebelum Penambahan Modal Before Capital Addition			Setelah Penambahan Modal Per tanggal 13 Desember 2021 After Capital Addition per 13 December 2021		
	Jumlah Saham Beredar (Lembar Saham) Total Outstanding Shares (Number of Shares)	Nilai Nominal Saham @Rp100 per Saham Share Par Value @Rp100 per Share (Rp)	Kepemilikan Saham Share Ownership (%)	Jumlah Saham Beredar (Lembar Saham) Total Outstanding Shares (Number of Shares)	Nilai Nominal Saham @Rp100 per Saham Share Par Value @Rp100 per Share (Rp)	Kepemilikan Saham Share Ownership (%)
PT Victoria Investama Tbk	4,157,237,242	415,723,724,200	43.59	4,128,870,132	412,887,013,200	39.37
Suzanna Tanojo	1,538,152,114	153,815,211,400	16.13	1,538,152,114	153,815,211,400	14.67
DEG-Deutsche Investitions -Und Entwicklungsgesellschaft MbH	780,394,335	78,039,433,500	8.18	780,394,335	78,039,433,500	7.44
PT Nata Patindo	395,484,865	39,548,486,500	4.15	395,484,865	39,548,486,500	3.77
Masyarakat (masing-masing kepemilikan dibawah 5%) Public (each shareholding below 5%)	2,666,884,422	266,688,442,200	27.96	3,644,231,122	364,423,112,200	34.75
<b>Jumlah Modal Ditempatkan dan Disetor</b> Total Subscribed and Paid-up Capital	<b>9,538,152,978</b>	<b>953,815,297,800</b>	<b>100.00</b>	<b>10,487,132,568</b>	<b>1,048,713,256,800</b>	<b>100.00</b>

## Penjelasan, Pertimbangan, dan Alasan Pelaksanaan PMTHMETD

Pelaksanaan PMTHMETD dilakukan sebagai pemenuhan terhadap Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2020 tentang Konsolidasi Bank Umum dimana Bank wajib memenuhi modal inti minimum sebesar Rp2.000.000.000.000,- pada 31 Desember 2021. Oleh karena itu, Bank melihat bahwa alternatif pendanaan dalam rangka peningkatan modal disetor yakni melalui pengeluaran saham dari portepel dengan mekanisme PMTHMETD sesuai dengan Peraturan Otoritas Jasa Keuangan No. 14/2019. Bank merasakan perlu untuk memperkuat struktur permodalan dan meningkatkan jumlah saham yang beredar sehingga secara tidak langsung meningkatkan likuiditas perdagangan atas saham Bank Victoria.

Selain melaksanakan PMTHMETD, Bank tidak melakukan aksi korporasi lain, seperti pemecahan saham (*stock split*), penggabungan saham (*reverse stock*), dividen saham, saham bonus, jumlah efek konversi yang diterbitkan, serta perubahan nilai nominal saham.

## Aktivitas Perdagangan Saham

Pada tahun 2021, aktivitas perdagangan saham Bank tidak mengalami penghapusan pencatatan saham (*delisting*) dalam tahun buku.

## Explanation, Consideration, and Reasons for the Capital Addition Without Pre-Emptive Rights (PMTHMETD)

The PMTHMETD was carried out in compliance with the Financial Services Authority Regulation No. 12/POJK.03/2020 on Consolidation of Commercial Banks in which the Bank must meet a minimum common equity tier of Rp2,000,000,000,000 as of 31 December 2021. As such, the Bank saw an alternative funding for the purpose of paid-up capital increase through the issuance of shares from the portfolio through PMTHMETD mechanism according to the Financial Services Authority Regulation No. 14/2019. The Bank felt the need to strengthen its capital structure and increase the number of outstanding shares so that it will indirectly increase Bank Victoria's shares trading liquidity.

Other than conducting PMTHMETD, the Bank did not conduct any other corporate actions such as stock split, reverse stock, stock dividend, bonus stock, number of convertible securities issued, and change in share par value.

## Stock Trading Activities

In 2021, the Bank's stock trading activities did not experience delisting of shares in the fiscal year.

# Ikhtisar Obligasi

## Bonds Highlights

Uraian Description	Jumlah (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Terbit Issuance Dates	Tanggal Jatuh Tempo Maturity Dates	Peringkat Ratings		Status Pembayaran Payment Status
						2021	2020	
Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dengan tingkat bunga tetap Bank Victoria Continuous Bond I Phase I of 2017 at fixed interest rate	300,000	5	10.30	11 Juli 2017 11 July 2017	11 Juli 2022 11 July 2022	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dengan tingkat bunga tetap Bank Victoria Continuous Subordinated Bond I Phase I of 2017 at fixed interest rate	50,000	7	11.00	11 Juli 2017 11 July 2017	11 Juli 2024 11 July 2024	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat bunga tetap Seri B Bank Victoria Continuous Bond I Phase II of 2018 at fixed interest rate B Series	200,000	5	10.30	5 Juni 2018 5 June 2018	5 Juni 2023 5 June 2023	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat bunga tetap Bank Victoria Continuous Subordinated Bond I Phase II of 2018 at fixed interest rate	350,000	7	11.00	5 Juni 2018 5 June 2018	5 Juni 2025 5 June 2025	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 Bank Victoria Continuous Subordination Bonds II Phase I Year 2019	250,000	7	11.75	28 Juni 2019 28 June 2019	28 Juni 2026 28 June 2026	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid

Uraian Description	Jumlah (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Terbit Issuance Dates	Tanggal Jatuh Tempo Maturity Dates	Peringkat Ratings		Status Pembayaran Payment Status
						2021	2020	
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 Bank Victoria Continuous Subordination Bonds II Phase II Year 2019	150,000	7	11.25	8 November 2019	8 November 2026	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 Bank Victoria Continuous Subordination Bonds II Phase III Year 2020	60,000	7	11.25	1 April 2020	1 April 2027	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) IdBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) IdBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid





## Peristiwa Penting Significant Events

**5 Februari 2021** / February 2021

**Bank Victoria Meraih Penghargaan 2<sup>nd</sup> The Best GCG Award 2021 / Bank Victoria Ranked 2<sup>nd</sup> in The Best GCG Award 2021**



Bank Victoria berhasil meraih penghargaan 2<sup>nd</sup> The Best GCG Award 2021 Kategori Public Company - Bank BUKU II Asset >Rp25 T yang diselenggarakan oleh Majalah Economic Review, Ideku Group, Indonesia-Asia Institute.

Bank Victoria managed to rank the 2<sup>nd</sup> in The Best GCG Award 2021 for Category of Public Company of BUKU II Bank, Assets above Rp25 Trillion, held by Economic Review Magazine, Ideku Group, Indonesia-Asia institute.

**25 Maret 2021** / 25 March 2021

**Bank Victoria Meraih Penghargaan 15 Years Appreciation Customer Loyalty Award 2021 / Bank Victoria Earned 15 Years Appreciation Customer Loyalty Award 2021**



Bank Victoria berhasil meraih penghargaan 15 Years Appreciation Customer Loyalty Award 2021 yang diselenggarakan oleh PT Rintis Sejahtera.

Bank Victoria managed to earn 15 Years Appreciation Customer Loyalty Award 2021 held by PT Rintis Sejahtera.

**9 April 2021**

**Bank Victoria Meraih Penghargaan Innovation Business Award 2021 / Bank Victoria Earned Innovation Business Award 2021**



Bank Victoria berhasil meraih penghargaan Innovation Business Award 2021 Category Innovation Company Winner 2021 yang diselenggarakan oleh PT Rintis Sejahtera.

Bank Victoria managed to earn Innovation Business Award 2021 under Innovation Company Winner 2021 category, held by PT Rintis Sejahtera.

**9 April 2021**

**Bank Victoria Meraih Penghargaan 2<sup>nd</sup> The Best Indonesia Interprises Risk Management Award-VI-2021 / Bank Victoria Ranked 2<sup>nd</sup> in The Best Indonesia Interprises Risk Management Award-VI-2021**



Bank Victoria berhasil meraih penghargaan 2<sup>nd</sup> The Best Indonesia Interprises Risk Management Award-VI-2021 Kategori Bank BUKU II Public Company Asset Rp25 Triliun - <Rp50 Triliun yang diselenggarakan oleh Majalah Economic Review, Ideku Group, Indonesia-Asia Institute.

Bank Victoria managed to rank 2<sup>nd</sup> in The Best Indonesia Interprises Risk Management Award-VI-2021, under category of BUKU II Bank of Public Company with Assets between Rp25 Trillion to <Rp50 Trillion, held by Economic Review Magazine, Ideku Group, Indonesia-Asia Institute.

**6 Mei 2021 /** May 2021

**Bank Victoria melakukan penerbitan saham atas Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD). / Bank Victoria issued shares through Capital Addition Without Pre-Emptive Rights (PMTHMETD).**



Bank Victoria melakukan penerbitan saham atas Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) sebanyak 586.205.939 lembar saham dengan harga pelaksanaan sebesar Rp160,- per saham atau seluruhnya sejumlah Rp93.792.950.240,- dan telah dicatatkan di Bursa Efek Indonesia pada 7 Mei 2021.

Bank Victoria issued 586,205,939 shares through Capital Addition Without Pre-Emptive Rights (PMTHMETD) at execution price of Rp160 per share or a total of Rp93,792,950,240, which was listed on Indonesia Stock Exchange on 7 May 2021.

**7-8 Mei 2021 /** May 2021

**Santunan Ramadhan 1442 H Bank Victoria kepada Panti Sosial Disabilitas Ganda Wisma Tuna Ganda Palsigunung, Yayasan Yatim Daarul Ma' Wa, dan Yayasan Yatim Piatu Nurul Mubarak / Donation for Ramadhan 1442 H from Bank Victoria to Ganda Wisma Tuna Ganda Palsigunung Disability Community Center, Daarul Ma' Wa Orphanage Foundation, and Nurul Mubarak Orphanage Foundation**



Bank Victoria melalui kegiatan tanggung jawab sosial (*corporate social responsibility/CSR*) Victoria Peduli menyelenggarakan kegiatan Santunan Ramadhan 2021 di Panti Sosial Disabilitas Ganda Wisma Tuna Ganda Palsigunung yang berlokasi di Depok, Yayasan Yatim Daarul Ma' Wa yang berlokasi di Depok, dan Yayasan Yatim Piatu Nurul Mubarak yang berlokasi di Jakarta Selatan. Selain penyerahan santunan kepada anak asuh Yayasan panti asuhan, santunan Ramadhan juga diserahkan kepada anak almarhum karyawan Bank Victoria.

Bank Victoria through its corporate social responsibility (CSR) activities, Victoria Peduli, organized 2021 Ramadhan donation to Ganda Wisma Tuna Ganda Palsigunung Disability Community Center located in Depok, Daarul Ma' Wa Orphanage Foundation located in Depok, and Nurul Mubarak Orphanage Foundation located in South Jakarta. Aside from Ramadhan donation to orphanages, Ramadhan donation was also made to the children of Bank Victoria's deceased employees.

**11 Juni 2021 /** June 2021

**Bank Victoria Meraih Penghargaan 2<sup>nd</sup> The Best Informative Website 2021/ Bank Victoria Ranked 2<sup>nd</sup> in The Best Informative Website 2021**



Bank Victoria berhasil meraih penghargaan 2<sup>nd</sup> *The Best Informative Website - 2021* Kategori Bank BUKU II yang diselenggarakan oleh Majalah Economic Review, Ideku Group, Indonesia-Asia Institute. Penghargaan diberikan sebagai apresiasi tertinggi yang diberikan kepada Perbankan di Indonesia yang terbaik dalam kategori untuk *Corporate Secretary dan Corporate Communication*.

Bank Victoria managed to rank 2<sup>nd</sup> in The Best Informative Website - 2021, BUKU II Bank category, held by Economic Review Magazine, Ideku Group, Indonesia-Asia Institute. The award was given as the highest appreciation to Indonesian banking industry under Corporate Secretary and Corporate Communication category.

**16 Juni 2021 /** June 2021

**Bank Victoria mengikuti Program Vaksinasi Massal Sektor Jasa Keuangan / Bank Victoria participated in Financial Services Sector Mass Vaccination Program**



Bank Victoria sebagai salah satu pelaku sektor jasa keuangan turut berpartisipasi dalam Program Vaksinasi Massal Sektor Jasa Keuangan sehubungan dengan rencana pemberian vaksin untuk pegawai industri jasa keuangan (IJK) dan masyarakat terkait yang diselenggarakan oleh Otoritas Jasa Keuangan. Program vaksinasi tersebut dilaksanakan di kawasan Tenis Indoor Senayan, Jakarta.

Bank Victoria as one of financial services sector players participated in the Financial Services Sector Mass Vaccination, in relation to the vaccination program for employees of financial services institutions, and for the community with regards to the vaccination program carried out by Financial Services Authority. The vaccination program was carried out in Indoor Tennis area in Senayan, Jakarta.

**25 Juni 2021 /** June 2021

**Rapat Umum Pemegang Saham Tahunan Bank Victoria 2021 / Bank Victoria's 2021 Annual General Meeting of Shareholders**



Bank Victoria melaksanakan Rapat Umum Pemegang Saham Tahunan yang bertempat di Gedung Graha BIP, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930.

Bank Victoria held the Annual General Meeting of Shareholders at Graha BIP Building, Jl. Gatot Subroto Kav. 23, South Jakarta, 12930.

**29 Oktober 2021 /** October 2021

**CSR Bank Victoria kepada Sekolah Dasar Dewi Sartika dan Sekolah Dasar Laksa Bhakti / Bank Victoria's CSR to Dewi Sartika and Laksa Bhakti Elementary School**



Bank Victoria melakukan kegiatan CSR Victoria Peduli dengan memberikan sarana sanitasi kepada Sekolah Dasar Dewi Sartika yang berlokasi di Gg. Manunggal 7 No. 19 RT 05 RW 15 Kel. Kali Baru, Kec. Cilincing, Jakarta Utara, serta menyerahkan sarana pendukung pendidikan berupa matras olahraga kepada Sekolah Dasar Laksa Bhakti yang berlokasi di Jl. Laksa III No. 6 RT 11 RW 01 Kel. Jembatan Lima, Kec. Tambora, Jakarta Barat.

Bank Victoria carried out Victoria Peduli CSR activities, by providing sanitation facilities to Dewi Sartika Elementary School located in Gg. Manunggal 7 No. 19 RT 05 RW 15 Kel. Kali Baru, Kec. Cilincing, North Jakarta, and provided educational supporting facilities in the form of sports mattresses to Laksa Bhakti Elementary School located in Jl. Laksa III No. 6 RT 11 RW 01 Kel. Jembatan Lima, Kec. Tambora, West Jakarta.

**19 November 2021** / November 2021

**Bank Victoria meraih Penghargaan Indonesia Finance Award-IV-2021 (IFA-IV-2021) / Bank Victoria Earned Indonesia Finance Award-IV-2021 (IFA-IV-2021)**



Bank Victoria berhasil meraih Penghargaan *Indonesia Finance Award-IV-2021* (IFA-IV-2021) dalam kategori *Public Bank Company sector Financial – Aset >Rp25 Triliun* dengan *score Good* yang diselenggarakan oleh Majalah *Economic Review*.

Bank Victoria earned *Indonesia Finance Award-IV-2021* (IFA-IV-2021) under category of *Public Bank, Financial Sector – Assets above Rp25 Trillion*, with *Good* score. The award was given by *Economic Review Magazine*.

**30 November 2021** / November 2021

**Rapat Umum Pemegang Saham Luar Biasa Bank Victoria 2021 / Bank Victoria's 2021 Extraordinary General Meeting of Shareholders**



Bank Victoria melaksanakan Rapat Umum Pemegang Saham Luar Biasa yang bertempat di Gedung Graha BIP, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930.

Bank Victoria held an Extraordinary General Meeting of Shareholders at Graha BIP Building, Jl. Gatot Subroto Kav. 23, South Jakarta 12930.

**10 Desember 2021** / December 2021

**Bank Victoria melakukan penerbitan saham atas Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) / Bank Victoria issued shares for Capital Addition Without Pre-Emptive Rights (PMTHMETD)**



Bank Victoria melakukan penerbitan saham atas Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) sebanyak 948.979.590 lembar saham dengan harga pelaksanaan sebesar Rp196,- setiap sahamnya atau seluruhnya sejumlah Rp185.999.999.640,- dan telah dicatatkan di Bursa Efek Indonesia pada 13 Desember 2021.

Bank Victoria issued 948,979,590 shares for Capital Addition Without Pre-Emptive Rights (PMTHMETD) at execution price of Rp196 for each share or a total of Rp185,999,999,640, which was listed on Indonesia Stock Exchange on 13 December 2021.



## Penghargaan dan Sertifikasi Awards and Certifications



### 2<sup>nd</sup> The Best GCG Award 2021

**Kategori / Category**  
Public Company - Bank BUKU II  
Asset > Rp25 T

Public Company - Category of BUKU II Bank, Asset > Rp25 T

**Tanggal / Dated**  
5 Februari / February 2021

**Penerima / Awardee**  
Bank Victoria

**Penyelenggara / Organizer**  
Majalah Economic Review, Ideku Group, dan Indonesia-Asia Institute  
Economic Review Magazine, Ideku Group, and Indonesia-Asia Institute



### 15 Years Appreciation Customer Loyalty Award 2021

**Tanggal / Dated**  
25 Maret / March 2021

**Penerima / Awardee**  
Bank Victoria

**Penyelenggara / Organizer**  
PT Rintis Sejahtera



### Innovation Business Award 2021 Category Innovation Company Winner 2021

**Tanggal / Dated**  
9 April 2021

**Penerima / Awardee**  
Bank Victoria

**Penyelenggara / Organizer**  
PT Rintis Sejahtera



### 2<sup>nd</sup> The Best Indonesia Interprises Risk Management Award-VI-2021

**Kategori / Category**  
Bank BUKU II Public Company  
Asset Rp25 Triliun - <Rp50 Triliun  
BUKU II Bank, Public Company, Asset  
Rp25 Trillion - <Rp50 Trillion

**Tanggal / Dated**  
9 April 2021

**Penerima / Awardee**  
Bank Victoria

**Penyelenggara / Organizer**  
Majalah Economic Review, Ideku Group, dan Indonesia-Asia Institute  
Economic Review Magazine, Ideku Group, and Indonesia-Asia Institute



### 2<sup>nd</sup> The Best Informative Website - 2021

**Kategori / Category**  
Bank BUKU II  
Buku II Banks

**Tanggal / Dated**  
11 Juni / June 2021

**Penerima / Awardee**  
Corporate Secretary dan / and  
Corporate Communication Bank  
Victoria

**Penyelenggara / Organizer**  
Majalah Economic Review, Ideku Group,  
dan Indonesia-Asia Institute  
Economic Review Magazine, Ideku  
Group, and Indonesia-Asia Institute



### Indonesia Finance Award-IV-2021 (IFA-IV-2021)

**Kategori / Category**  
Public Bank Company Sector Financial  
- Aset > 25 Triliun  
Public Bank Companies, Financial  
Sector - with Assets > Rp25 Trillion  
Score Good

**Tanggal / Dated**  
19 November 2021

**Penerima / Awardee**  
Bank Victoria

**Penyelenggara / Organizer**  
Majalah Economic Review  
Economic Review Magazine

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# Laporan Manajemen

Management Report

“Dalam menyikapi perubahan dan tantangan tahun 2021, Bank Victoria menempuh kebijakan dan strategi yang mengarah kepada percepatan perubahan Bank dalam memberikan layanan dan menghadirkan produk dan aktivitas yang baru dan sesuai dengan kebutuhan nasabah, serta dengan cepat beradaptasi terhadap transformasi bisnis digital.”

“In responding to the changes and challenges in 2021, Bank Victoria adopted policies and strategies that led to accelerated changes in the Bank in providing services and presenting new products and activities according to customer needs, as well as quickly adapting to digital business transformation.”





## Laporan Dewan Komisaris

### Report of the Board of Commissioners

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**Kami mengapresiasi upaya Direksi untuk melakukan diversifikasi produk dan layanan sesuai perkembangan tren digitalisasi. Meskipun implementasinya belum memberikan hasil yang optimal saat ini, namun kami meyakini bahwa seiring dengan peningkatan kualitas produk dan layanan secara bertahap, Bank dapat menikmati pertumbuhan yang diharapkan pada periode selanjutnya.**

We also appreciate the Board of Directors' efforts to diversify products and services according to the development of digitalization trends. Although the implementation has not provided optimal results yet, we believe that along with the gradual improvement in product and service quality, the Bank can enjoy the expected growth in the next period.



**Oliver Simorangkir**

**Komisaris Utama**  
President Commissioner

**Pemegang Saham dan Pemangku Kepentingan yang Terhormat,**

Segenap jajaran Dewan Komisaris PT Bank Victoria International Tbk bersyukur dapat melewati tahun 2021 dengan baik, meskipun perjalanan Bank di tahun tersebut masih penuh tantangan. Kompetisi perbankan untuk memperebutkan dana murah masih tinggi akibat penyebaran Covid-19 varian Delta yang membatasi mobilitas dan menghambat aktivitas ekonomi. Selain itu, ketidakpastian pasar keuangan masih terus berlanjut dengan turut dipengaruhi oleh antisipasi pasar terhadap kebijakan *tapering the Fed*.

Meskipun demikian, upaya pemerintah untuk menerapkan kebijakan fiskal dan moneter dipandang mampu menjaga stabilitas ekonomi nasional, baik sektor riil maupun sektor keuangan. Hal ini turut menjaga optimisme jajaran manajemen dalam menjalankan tugas dan tanggung jawab yang telah dipercayakan oleh Pemegang Saham dan pemangku kepentingan. Adapun hasil pelaksanaan fungsi pengawasan terhadap perjalanan Bank Victoria di sepanjang tahun 2021 kami sampaikan sebagai berikut.

**Dear Distinguished Shareholders and Stakeholders,**

The entire members of Board of Commissioners of PT Bank Victoria International Tbk are grateful to have passed the year 2021 in a good condition, even though the Bank's journey was still full of challenges. Banking competition for low-cost funds was still high due to the Covid-19, Delta variant, spread that restricted mobility and restrained economic activities. Furthermore, financial market uncertainty was still ongoing due to the market anticipation for the Fed's tapering policy.

Nevertheless, the government's efforts to apply a mix of fiscal and monetary policies were seen as capable of maintaining the national economic stability, both in the real sector and in the financial sector. This also maintained the management's optimism in carrying out its duties and responsibilities as entrusted by Shareholders and stakeholders. The results of supervisory function on Bank Victoria's journey throughout 2021 are as follows.

## Pengawasan terhadap Perumusan dan Implementasi Strategi Bank

Penyebaran pandemi Covid-19 yang berlangsung sejak tahun 2020 telah mendorong perubahan signifikan bagi seluruh pelaku ekonomi ke arah digital. Perubahan ini bahkan perlu disegerakan oleh perbankan sebagai pelaksana fungsi intermediasi keuangan yang menopang pertumbuhan ekonomi. Hal inilah yang mendasari arah kebijakan Bank Victoria di tahun 2021 untuk meneruskan strategi yang telah dilakukan periode sebelumnya dan melakukan percepatan perubahan pada digitalisasi produk dan layanan.

Perumusan strategi digitalisasi ini dilakukan dengan persetujuan jajaran Dewan Komisaris, sebagaimana tertuang dalam Rencana Bisnis Bank Tahun 2021-2023 dan perubahannya. Demikian pula implementasinya telah melalui pengawasan ketat bersama komite pendukung Dewan Komisaris yang melakukan penelaahan terkait pokok bahasan dan laporan yang disampaikan Direksi dan organ pendukungnya. Hasil pengawasan, serta nasihat dan rekomendasi kami sampaikan kepada Direksi melalui rapat gabungan yang dilaksanakan secara berkala pada setiap bulan.

Koordinasi aktif antara Dewan Komisaris dan Direksi dalam perumusan dan implementasi strategi ini menjadi sangat penting mengingat iklim bisnis masih belum sepenuhnya kondusif dan dinamika usaha dapat terjadi sewaktu-waktu. Koordinasi yang intensif juga memungkinkan Direksi tetap bergerak dalam fleksibilitas dengan menerapkan prinsip kehati-hatian yang diperlukan.

## Penilaian terhadap Kinerja Direksi Mengenai Pengelolaan Bank

Pencapaian kinerja Bank secara kuantitatif memang belum sepenuhnya sesuai dengan harapan, baik dari kinerja operasional maupun keuangan. Meskipun demikian, kami mengapresiasi strategi yang ditempuh Direksi dengan orientasi pada keberlanjutan usaha dalam jangka panjang. Direksi melakukan beberapa penyesuaian fundamental yang dinilai penting untuk meraih pertumbuhan yang berkelanjutan dan meningkatkan penerapan keuangan berkelanjutan di Bank Victoria.

Kami juga mengapresiasi upaya Direksi untuk melakukan diversifikasi produk dan layanan sesuai perkembangan tren digitalisasi. Meskipun implementasinya belum memberikan hasil yang optimal saat ini, namun kami meyakini bahwa seiring dengan peningkatan kualitas produk dan layanan secara bertahap, Bank dapat menikmati pertumbuhan yang diharapkan pada periode selanjutnya.

## Supervision of the Bank's Strategy Formulation and Implementation

The Covid-19 pandemic that has been going on since 2020 has driven significant changes for all economic actors towards digital directions. Such change shall even be accelerated by the banking sector as the executor of financial intermediation function to support the economic growth. Thus, Bank Victoria underlies its policy direction in 2021 with continued strategies carried out in the previous period and accelerated changes in the digitalization of products and services.

The digitalization strategies were formulated under the Board of Commissioners' approval, as stated in the Bank's Business Plan 2021-2023 and its revisions. Its implementation also went through strict supervision by the Board of Commissioners' supporting committee that reviewed relevant topics and reports submitted by the Board of Directors and its supporting organs. Our supervision results, advice, and recommendations were conveyed to the Board of Directors through the joint meetings held regularly every month.

Active coordination between the Board of Commissioners and Board of Directors in formulating and implementing these strategies is very important, considering that the business climate was still not fully conducive and business dynamics could occur at any time. Such intensive coordination also allowed the Board of Directors to remain flexible by applying the necessary prudential principles.

## Assessment of the Board of Directors' Performance on the Bank's Management

The Bank's performance achievement quantitatively did not fully meet the expectations, both in terms of operational and financial performance. Nevertheless, we appreciate the strategies taken by the Board of Directors with an orientation towards business sustainability in the long term. The Board of Directors made several fundamental adjustments deemed important to achieve sustainable growth and improve the implementation of sustainable finance at Bank Victoria.

We also appreciate the Board of Directors' efforts to diversify products and services according to the development of digitalization trends. Although the implementation has not provided optimal results yet, we believe that along with the gradual improvement in product and service quality, the Bank can enjoy the expected growth in the next period.



## Pandangan atas Prospek Usaha

Pertumbuhan ekonomi diperkirakan akan semakin baik di tahun 2022 dengan didorong pengendalian penyebaran Covid-19 yang meningkatkan aktivitas ekonomi, serta kebijakan moneter dan makroprudensial yang menjaga stabilitas sektor riil dan sektor moneter. Kami melihat bahwa Direksi telah mengantisipasi dan memahami prospek pemulihan ekonomi yang dapat membawa pertumbuhan usaha Bank.

Dengan strategi yang mengarah kepada inovasi dan peningkatan kualitas tata kelola, kami percaya bahwa kinerja Bank akan pulih dan dapat mencapai target bisnis utama. Kami pun mendorong Direksi untuk terus mengoptimalkan kekuatan Bank dan mengurangi kelemahan guna meningkatkan peluang memenangkan persaingan pasar. Direksi juga perlu meningkatkan pengelolaan risiko dan tingkat kesehatan Bank untuk mencapai pengelolaan bisnis yang *prudent*.

## Pandangan atas Penerapan Tata Kelola Perusahaan yang Baik

Untuk meraih stabilitas sektor keuangan, lembaga jasa keuangan perlu terus meningkatkan kualitas penerapan tata kelola perusahaan yang baik (GCG). Bank telah menerapkan tata kelola perusahaan yang baik melalui pembagian wewenang, tugas, dan tanggung jawab organ tata kelola secara tepat dan efektif.

Dalam menerapkan GCG, Bank mengelola potensi-potensi benturan kepentingan agar tidak menimbulkan kerugian atau mengurangi keuntungan yang dapat diterima. Bank mengutamakan tindakan pencegahan, serta selalu meningkatkan budaya pembelajaran dan budaya kepatuhan pada setiap aspek bisnis oleh seluruh insan Bank. Agar penerapannya efektif, Bank menyediakan sarana pelaporan pelanggaran, termasuk tindakan *fraud*. Sarana pelaporan pelanggaran ini telah dikelola dengan baik yang melibatkan peran Dewan Komisaris dan/atau Direksi untuk memutuskan sanksi yang diberikan terhadap pelaku pelanggaran.

## Pandangan atas Penerapan Tanggung Jawab Sosial dan Lingkungan

Sebagai bagian dari penerapan kelola yang bertanggung jawab terhadap semua kelompok pemangku kepentingan, Bank secara berkesinambungan terus melanjutkan program-program pengelolaan aspek sosial dan lingkungan dengan semangat keberlanjutan. Pemenuhan tanggung jawab ini tidak terhalang oleh pandemi, melainkan pandemi semakin mendorong kesadaran dan komitmen Bank untuk memenuhi tanggung jawab tersebut. Bank meyakini bahwa pengelolaan tanggung jawab sosial dan lingkungan secara tepat dan konsisten akan berdampak pada pertumbuhan ekonomi yang solid.

## Views on Business Outlook

The economic growth is predicted to improve in 2022, driven by the controlled Covid-19 spread that increases economic activities, as well as the monetary and macroprudential policies that maintain the stability in the real sector and the monetary sector. We see that the Board of Directors has anticipated and understood the prospect of economic recovery that can bring business growth to the Bank.

With strategies leading to innovation and improvement of governance quality, we believe that the Bank's performance will recover and be able to achieve its main business targets. We also encourage the Board of Directors to continue to optimize the Bank's strengths and reduce weaknesses to increase opportunities to win market competition. The Board of Directors also needs to improve its risk management and the Bank's soundness level to achieve prudent business management.

## Views on the Implementation of Good Corporate Governance

To achieve financial sector stability, financial service institutions shall continuously improve the good corporate governance (GCG) implementation quality. The Bank has implemented good corporate governance through proper and effective division of authority, duties, and responsibilities of the governance organs.

In implementing GCG, the Bank manages potential conflicts of interest to prevent possible losses or reduction of possible profits. The Bank prioritizes preventive measures, and always improves the learning culture and compliance culture in every business aspect of all Bank personnel. For effective implementation, the Bank provides whistleblowing channel, including to report fraudulent actions. This whistleblowing channel has been managed properly by involving the role of the Board of Commissioners and/or Board of Directors to impose sanctions on the violators.

## View on Implementation of Social and Environmental Responsibilities

As part of implementing responsible governance for all stakeholder groups, the Bank continues to carry out social and environmental management programs in the spirit of sustainability. Fulfillment of such responsibilities shall not be hindered by the pandemic. On the contrary, the pandemic has further encouraged the Bank's awareness of and commitment to fulfilling these responsibilities. The Bank believes that proper and consistent management of social and environmental responsibilities will have an impact on solid economic growth.

Kami mengapresiasi upaya Direksi untuk melihat lebih jauh dampak dari risiko sosial dan lingkungan bagi perjalanan Bank. Kebijakan dan program yang ditempuh pun kami pandang telah sesuai dengan prinsip keuangan inklusif serta kebutuhan pemangku kepentingan yang berpengaruh secara signifikan bagi Bank.

## Perubahan Komposisi Anggota Dewan Komisaris

Hingga tahun 2021, komposisi Dewan Komisaris Bank Victoria dipandang telah memadai untuk menjalankan peran pengawasan dan pemberian nasihat dan tidak terjadi perubahan pada susunan keanggotaan. Dengan demikian, Dewan Komisaris yang menjabat meliputi:

Komisaris Utama : Oliver Simorangkir;  
Komisaris/Komisaris Independen : Gunawan Tenggarahardja;

Komisaris/Komisaris Independen : Zaenal Abidin, PhD.

## Penutup

Laporan pertanggungjawaban ini kami akhiri dengan menyampaikan terima kasih yang tulus kepada seluruh pihak yang telah berkontribusi secara langsung maupun tidak langsung bagi keberlanjutan usaha Bank Victoria. Kami menyampaikan terima kasih kepada Pemegang Saham atas kepercayaan dan dukungan yang diberikan. Terima kasih kepada Direksi, komite-komite Dewan Komisaris dan Direksi, serta seluruh karyawan yang telah mengoptimalkan pengelolaan Bank di tengah kondisi yang masih penuh tantangan. Kami ucapkan terima kasih juga kepada mitra usaha, nasabah, masyarakat, serta pemerintah atas loyalitas dan dukungan dalam berbagai bentuk kepada Bank. Kami berharap agar strategi pertumbuhan dan pengembangan usaha yang akan diterapkan manajemen Bank ke depannya dapat memberikan manfaat yang lebih besar bagi seluruh pemangku kepentingan.

We appreciate the Board of Directors' efforts to take a closer look at the impact of social and environmental risks on the Bank's journey. We also view that the policies and programs adopted are in accordance with the principles of financial inclusion and the needs of stakeholders that have a significant impact on the Bank.

## Change in the Board of Commissioners' Composition

Until 2021, the Board of Commissioners' composition of Bank Victoria was deemed adequate to carry out the supervisory and advisory roles, and therefore, there were no changes to the composition. Thus, the current members of the Board of Commissioners are:

President Commissioner : Oliver Simorangkir;  
Commissioner/Independent : Gunawan Tenggarahardja;  
Commissioner  
Commissioner/Independent : Zaenal Abidin, PhD.  
Commissioner

## Closing

We conclude this accountability report by expressing our sincere gratitude to all parties who have contributed directly or indirectly to Bank Victoria's business sustainability. We would like to thank the Shareholders for their trust and support. We also thank the Board of Directors, the committees of the Board of Commissioners and the Board of Directors, as well as all employees who have optimized the management of the Bank in the midst of challenging conditions. We would also thank our business partners, customers, communities, and government for their loyalty and support in various forms to the Bank. We hope that the business growth and development strategies that will be implemented by the Bank's management in the future can provide greater benefits for all stakeholders.

Jakarta, Mei 2022  
Jakarta, May 2022

Atas nama Dewan Komisaris PT Bank Victoria International Tbk  
On behalf of the Board of Commissioners PT Bank Victoria International Tbk



**Oliver Simorangkir**  
Komisaris Utama  
President Commissioner

## Dewan Komisaris

### Board of Commissioners



#### 1. Oliver Simorangkir

Komisaris Utama  
President Commissioner

#### 2. Gunawan Tenggarahardja

Komisaris/Komisaris Independen  
Commissioner/Independent  
Commissioner

#### 3. Zaenal Abidin, PhD

Komisaris/Komisaris Independen  
Commissioner/Independent  
Commissioner

# Laporan Direksi

## Report of the Board of Directors

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**Terjaganya kinerja operasional Bank mampu menjaga rasio kinerja keuangan utama yang tetap sehat. Kewajiban penyediaan modal minimum (KPM) untuk risiko kredit, operasional, dan pasar pada tahun 2021 meningkat menjadi 17,49%.**

Maintained operational performance enabled the Bank to maintain sound main financial performance ratio. Capital Adequacy Ratio (CAR) for credit, operational, and market risks in 2021 increased to 17.49%.



**Ahmad Fajar**

Direktur Utama  
President Director

### **Pemegang Saham dan Pemangku Kepentingan yang Kami Hormati,**

Segenap jajaran Direksi PT Bank Victoria International Tbk bersyukur atas keberlanjutan usaha Bank hingga saat ini. Berbagai dinamika usaha yang terjadi tidak melemahkan jajaran manajemen untuk terus menjalankan fungsi pengelolaan usaha dengan benar dan bertanggung jawab, melainkan membuat kami semakin tertantang untuk dapat melakukan inovasi secara optimal untuk menjawab kebutuhan pemangku kepentingan. Bentuk pengelolaan usaha yang kami jalankan di sepanjang tahun 2021 kami sampaikan sebagai berikut.

### **Tantangan yang Dihadapi**

Hingga saat ini, negara-negara di dunia masih berjuang untuk mengatasi pandemi Covid-19. Meskipun pengendaliannya telah menjadi semakin baik dari waktu ke waktu, namun munculnya varian baru masih menjadi tantangan yang harus terus diwaspadai. Seperti halnya di tahun 2021, penyebaran varian Delta kembali memaksa pemerintah untuk mengambil kebijakan pembatasan mobilitas sehingga aktivitas ekonomi menjadi tertahan. Indeks keyakinan konsumen, penjualan ritel, indeks keyakinan bisnis, serta Purchasing Managers' Index (PMI) melandai pada triwulan II 2021. Mobilitas masyarakat dan aktivitas ekonomi membaik pada triwulan III 2021 seiring dengan penurunan pada kasus varian Delta.

#### **Dear Distinguished Shareholders and Stakeholders,**

The entire Board of Directors' members of PT Bank Victoria International Tbk are grateful for the Bank's business sustainability to date. Many business dynamics had happened, but they did not weaken the management to continue to carry out business management functions properly and responsibly. Instead, they made us increasingly challenged to be able to innovate optimally to answer stakeholders' needs. Herewith, we convey the business management form we ran throughout 2021 as follows.

### **Challenges Faced**

Until now, countries all over the world are still struggling to overcome the Covid-19 pandemic. Although the control has become better from time to time, emergence of new variants is still a challenge that must be watched out for. As in 2021, the Delta variant spread had forced the government to take another policy of restricting mobility, resulting in stifled economic activities. The consumer confidence index, retail sales, business confidence index, and the Purchasing Managers' Index (PMI) fell in the second quarter of 2021. Community mobility and economic activities improved in the third quarter of 2021 in line with the decline in the Delta variant cases.

Rangkaian kebijakan yang ditempuh pemerintah untuk mengendalikan Covid-19 di sepanjang tahun, baik dari upaya peningkatan kesehatan maupun peningkatan ekonomi dan sosial, pada akhirnya mampu mendorong pertumbuhan ekonomi sebesar 3,69% pada tahun 2021. Pertumbuhan ekonomi ditopang oleh membaiknya konsumsi swasta, investasi, konsumsi pemerintah, dan kinerja ekspor. Hampir seluruh sektor lapangan usaha mengalami pertumbuhan, termasuk jasa keuangan dan asuransi yang tumbuh 1,56%.

Meskipun pertumbuhan belum secara signifikan, namun fungsi intermediasi perbankan terus membaik. Penghimpunan dana pihak ketiga dan penyaluran kredit menunjukkan peningkatan yang sejalan dengan meningkatnya aktivitas dunia usaha dan konsumsi sebagai dampak dari melonggarnya aktivitas masyarakat. Pertumbuhan pada sektor perbankan ini didorong kebijakan regulator, terutama Otoritas Jasa Keuangan dan Lembaga Penjamin Simpanan yang mengeluarkan kebijakan terkait restrukturisasi kredit/pembiayaan, menetapkan tingkat bunga penjaminan yang rendah, serta memberikan relaksasi denda keterlambatan pembayaran premi penjaminan perbankan untuk mengupayakan terbentuknya tingkat suku bunga yang lebih efisien di sektor jasa keuangan.

Namun, di balik kebijakan yang mendorong pertumbuhan kredit ini, sektor perbankan perlu mempersiapkan daya tahan yang kuat dalam menyerap kerugian yang dapat ditimbulkan dari kebijakan restrukturisasi kredit melalui pembentukan cadangan kerugian penurunan nilai (CKPN). Tantangan jangka pendek ini diprakirakan akan selesai ketika pandemi Covid-19 berakhir.

Tak kalah menantang, pandemi menyebabkan perubahan ekosistem dan perubahan perilaku masyarakat yang menuntun pada penggunaan teknologi secara massif. Perkembangan pada penggunaan teknologi memberikan tantangan struktural bagi sektor perbankan yang harus turut beradaptasi, bahkan melakukan percepatan perubahan pada arah digitalisasi. Persaingan sektor perbankan untuk memperebutkan dana murah tidak hanya dipengaruhi oleh produk dengan bunga yang menarik, tetapi terutama dipengaruhi oleh produk dan layanan digital yang memberi kemudahan dan menjawab kebutuhan masyarakat digital.

## Kebijakan dan Strategi yang Ditempuh

Dalam menyikapi perubahan dan tantangan tahun 2021, Bank Victoria menempuh kebijakan dan strategi yang mengarah kepada percepatan perubahan Bank dalam memberikan layanan dan menghadirkan produk dan aktivitas yang baru dan sesuai dengan kebutuhan nasabah, serta dengan cepat beradaptasi terhadap transformasi bisnis digital. *Culture Value*, yakni *Safe* (keamanan), *Quick* (kecepatan), *Easy* (kemudahan), and *Warm* (kenyamanan dan kedekatan) pada sisi layanan, produk, proses, cara kerja, nuansa, dan lainnya menjadi tujuan akhir dari perubahan menyeluruh yang dilakukan. Perubahan ini ditempuh dengan memperhatikan arah pertumbuhan bisnis yang *prudent* dan berkelanjutan, penerapan prinsip tata kelola perusahaan yang baik (GCG) secara konsisten, peningkatan manfaat bagi nasabah, serta peningkatan nilai perusahaan bagi seluruh Pemegang Saham dan pemangku kepentingan.

Series of policies taken by the government to control the Covid-19 throughout the year, with efforts for health improvement as well as economic and social improvements, were eventually able to drive economic growth by 3.69% in 2021. The economic growth was supported by improved private consumption, investment, government consumption, and export performance. Almost all business sectors experienced growth, including financial services and insurance which grew by 1.56%.

Although the growth was not significant, the banking intermediation function continues to improve. The collection of third-party deposits and lending showed an increase in line with the increase in business activities and consumption as a result of the loosening of community activities. The growth in banking sector was driven by regulatory policies, especially the Financial Services Authority and the Indonesia Deposit Insurance Corporation, which issued policies related to loan/financing restructuring, set a low guarantee interest rate, and provided relaxation of penalties for late payment of bank guarantee premiums in order to establish a more efficient interest rate in the financial services sector.

However, behind these policies that encourage loan growth, the banking sector needs to prepare a strong resilience in absorbing losses that may arise from loan restructuring policies through the establishment of allowance for impairment losses (CKPN). This short-term challenge is expected to be completed when the Covid-19 pandemic ends.

Another challenging issue was the pandemic caused changes in ecosystems and changes in people's behavior that led to massive use of technology. Developments in the use of technology provide structural challenges for the banking sector, which must be adapted or even accelerated such changes towards the direction of digitalization. Competition in the banking sector for low-cost funds is not only influenced by products with attractive interest rates, but is mainly influenced by digital products and services that provide convenience and answer to the digital community needs.

## Policies and Strategies Taken

In responding to the changes and challenges in 2021, Bank Victoria adopted policies and strategies that led to accelerated changes in the Bank in providing services and presenting new products and activities according to customer needs, as well as quickly adapting to digital business transformation. *Culture Value*, namely *Safe* (security), *Quick* (speed), *Easy* (convenience), and *Warm* (comfort and proximity) in terms of services, products, processes, ways of working, nuances, and others become the ultimate goal of the overall changes made. These changes were taken with due observance of the direction of prudent and sustainable business growth, consistent implementation of good corporate governance (GCG) principles, increasing benefits for customers, and increasing corporate value for all shareholders and stakeholders.

Ke depannya, arah transformasi digital yang penguatan kedudukannya dirintis di tahun 2021 akan mengupayakan Bank Victoria berada di setiap ekosistem, baik ekosistem bisnis, *e-commerce*, sosial, pendidikan, dan lainnya.

Transformasi struktural dan fundamental tersebut disertai beberapa upaya efisiensi dan optimalisasi sumber daya yang dimiliki, dalam hal ini adalah jaringan kantor yang dinilai sudah tidak produktif atau tidak sesuai dengan target pasar yang sudah ditentukan oleh Bank. Bank pun terus mencari sumber pertumbuhan yang sehat dan cepat, antara lain dengan mengurangi ketergantungan dana pihak ketiga (DPK) dari deposito inti dan mengembangkan porsi deposito retail. Rasio tabungan dan giro (CASA) terus ditingkatkan dengan memanfaatkan fitur *Internet Banking and Mobile Banking* (IBMB), *Internet Banking Business* (ViBiz), serta pengenalan produk dan layanan baru yang mengedepankan *Safe* (keamanan), *Quick* (kecepatan), *Easy* (kemudahan), dan *Warm* (kenyamanan dan kedekatan).

Prinsip kehati-hatian dalam penyaluran kredit juga diprioritaskan untuk menjaga dan meningkatkan kualitas kredit dengan target pertumbuhan yang sehat dan berkesinambungan. Perubahan struktural yang dilakukan adalah dengan terus melakukan *shifting* dari segmen korporasi ke segmen SME dan *Commercial*. Penetrasi kredit mulai terarah kepada sektor usaha farmasi, rumah sakit, makanan dan minuman, logistik, serta *consumer goods* yang dipandang memiliki prospek pertumbuhan yang baik.

Dalam merumuskan kebijakan dan strategi tahun 2021, Direksi melakukan koordinasi intensif dengan Kepala Divisi untuk membahas hasil analisis perihal pertumbuhan ekonomi makro dan mikro, arah pertumbuhan Bank, perbedaan preferensi yang mendetail hingga tahun 2025, serta target yang ingin dicapai secara komprehensif. Kami pun melibatkan Dewan Komisaris untuk melakukan penelaahan atas rencana yang akan ditempuh untuk mendapatkan sudut pandang yang lebih luas dan rekomendasi yang menyempurnakan rencana yang disusun. Demikian pula dengan implementasi kebijakan dan strategi senantiasa berada dalam pengawasan ketat Direksi dan selalu menjadi agenda rapat rutin setiap bulan oleh internal Direksi maupun dengan Direktorat terkait.

## Pencapaian Kinerja

Kami menyadari bahwa penerapan strategi Bank Victoria di tahun 2021 belum sepenuhnya mencatatkan pertumbuhan dibandingkan tahun sebelumnya. Namun, kami tetap mengapresiasi pencapaian kinerja utama memenuhi ekspektasi yang kami susun dalam Rencana Bisnis Bank (RBB). Simpanan nasabah mencapai Rp18,07 triliun, bertahan dari sebelumnya Rp18,08 triliun dibandingkan tahun 2020. Pencapaian penghimpunan dana ini masih sesuai harapan dan mencapai 104,42% dari target. Demikian pula pinjaman yang diberikan meningkat 7,36% menjadi Rp14,68 triliun dari Rp13,68 triliun di periode sebelumnya dan mencapai 106,04% dari target.

Pencapaian kinerja operasional ini mempengaruhi kinerja keuangan Bank Victoria. Pendapatan bunga – neto meningkat 173,06% menjadi Rp418,20 miliar dari Rp153,15 miliar dan mencapai 130,77% dari target. Namun, peningkatan pada beban

In the future, the direction of digital transformation, whose position was strengthened initially in 2021, will ensure that Bank Victoria is in every ecosystem, either business, e-commerce, social, educational, or other ecosystems.

This structural and fundamental transformation is accompanied by several efficiency and optimization efforts of the available resources, in this case the office network deemed unproductive or not in accordance with the target market set by the Bank. The Bank also continues to look for sources of sound and fast growth, among others by reducing dependency on third party deposits (DPK) from core depositors and developing the portion of retail depositors. The savings account and current account ratio (CASA) continues to be improved by utilizing features of Internet Banking and Mobile Banking (IBMB), Internet Banking Business (ViBiz), and introducing new products and services that prioritize *Safe* (security), *Quick* (speed), *Easy* (convenience), and *Warm* (comfort and proximity).

The principle of prudence in lending is also prioritized to maintain and improve loan quality with a sound and sustainable growth target. Structural changes carried out were by continuously shifting from corporate segment to SME and Commercial segments. Loan penetration has begun to focus on pharmaceutical, hospital, food and beverage, logistics, and consumer goods business sectors deemed as having good growth prospects.

In formulating policies and strategies in 2021, the Board of Directors conducted intensive coordination with the Division Heads to discuss the analysis results regarding macro and micro economic growth, the Bank's growth direction, and the detailed differences in preferences until 2025. We also involve the Board of Commissioners to review the plans that will be taken to obtain a wider perspective and recommendations to improve the prepared plans. The implementation of policies and strategies is always under close supervision of the Board of Directors and is always on the agenda for regular monthly meetings by the internal Directors and related Directorates.

## Performance Achievement

We realize that the implementation of Bank Victoria's strategies in 2021 did not fully recorded growth compared to that of previous year. Nonetheless, we still appreciate the achievement of key performances that met the expectations we set out in the Bank's Business Plan (RBB). Deposits from customers reached Rp18.07 trillion, maintaining from that of 2020 of Rp18.08 trillion. The achievement in funding still met the expectations and reached 104.42% of the target. Furthermore, loans disbursed increased by 7.36% to Rp14.68 trillion from Rp13.68 trillion in the previous period and reached 106.04% of the target.

The operational performance achievement affected Bank Victoria's financial performance. Net interest income increased by 173.06% to Rp418.20 billion from Rp153.15 billion and reached 130.77% of the target. However, the increase in

operasional mempengaruhi profitabilitas sehingga Bank Victoria mencatatkan kerugian tahun berjalan sebesar Rp119,06 miliar, dimana kerugian ini mengalami penurunan 52,79% dari tahun sebelumnya sebesar Rp252,19 miliar. Selama tahun 2021, Bank juga melakukan *shifting* terhadap porsi segmen kredit korporasi menjadi sebesar 48% dari 56% pada tahun sebelumnya.

Terjaganya kinerja operasional Bank Victoria mampu menjaga rasio kinerja keuangan utama yang tetap sehat. Kewajiban penyediaan modal minimum (KPMM) untuk risiko kredit, operasional, dan pasar meningkat menjadi 17,49% dari 16,68%. Tingkat penghimpunan dana murah yang ditunjukkan dari *current account savings account* (CASA) *ratio* meningkat menjadi 24,64% dari 20,64%. Tingkat penyaluran kredit yang ditunjukkan dari *loan to deposit ratio* (LDR) meningkat menjadi 81,25% dari 75,64% dengan tingkat risiko kredit bermasalah yang ditunjukkan dari *non-performing loan* (NPL) bruto maupun neto yang menjadi 7,27% dan 4,08% dari 7,58% dan 4,91%. Demikian pula rasio kepatuhan tetap terjaga yang ditunjukkan dari tidak adanya pelanggaran batas maksimum pemberian kredit (BMPK).

Sedangkan, kinerja segmen syariah yang dihasilkan Bank Victoria Syariah sebagai Entitas Anak menunjukkan penurunan kinerja operasional. Total DPK turun 11,40% menjadi Rp1,22 triliun dari Rp1,38 triliun. Demikian pula pembiayaan turun 30,93% menjadi Rp805,99 miliar dari Rp1,17 triliun. Pencapaian kinerja operasional ini mempengaruhi pendapatan pengelolaan dana oleh bank sebagai pengguna dana yang menjadi Rp113,82 miliar, mengalami penurunan 26,85% dari Rp148,75 miliar di tahun sebelumnya. Namun, hak bagi hasil milik bank meningkat 24,51% menjadi Rp45,45 miliar dari Rp36,51 miliar sehingga segmen syariah dapat mencatatkan laba tahun berjalan sebesar Rp4,52 miliar dari rugi tahun berjalan sebesar Rp215 juta di tahun sebelumnya.

Selain itu, kinerja keuangan utama segmen syariah juga tetap dalam kendali. Rasio kecukupan modal meningkat menjadi 33,21% dari 24,69%. Rasio pendapatan bunga bersih meningkat menjadi 2,68% dari 1,92%. Namun, rasio pembiayaan terhadap DPK menjadi 65,26% dari 74,05% dengan *non-performing financing* (NPF) neto menjadi 3,72% dari 3,01% pada tahun sebelumnya.

## Penerapan Tata Kelola Bank

Dalam mengejar pertumbuhan bisnis yang sehat, Bank Victoria terus memperkuat penerapan dan pengelolaan kepatuhan, manajemen risiko, dan pengendalian internal pada seluruh aspek operasional dan bisnis sesuai dengan standar nasional maupun internasional yang berlaku. Dalam mengupayakan pertumbuhan kualitas penerapan tata kelola perusahaan yang baik (GCG), Bank terus melakukan sosialisasi dan komunikasi yang memadai untuk memastikan kesadaran terhadap ketiga fungsi GCG utama perbankan tersebut telah melekat pada setiap aktivitas di seluruh jenjang organisasi. Serangkaian tindakan dan langkah-langkah penegakan prinsip kehati-hatian, baik yang bersifat preventif (*ex-ante*) maupun kuratif (*ex-post*), ditempuh untuk memastikan kepatuhan Bank dan mengurangi risiko usaha dengan tetap memperhatikan ketentuan-ketentuan dari regulator bank.

operating expenses affected profitability, and therefore, Bank Victoria recorded a loss for the year of Rp119.06 billion, where this loss decreased by 52.79% from that of previous year of Rp252.19 billion. In 2021, the Bank conducted shifting of the portion of corporate loan segment to 48% from 56% in the previous year.

The well-maintained operational performance enabled Bank Victoria to maintain sound main financial performance ratios. The capital adequacy ratio (CAR) for credit, operational, and market risks increased to 17.49% from 16.68%. The level of low-cost funds as indicated by the current account savings account (CASA) ratio increased to 24.64% from 20.64%. The level of lending as indicated by loan to deposit ratio (LDR) increased to 81.25% from 75.64% and the level of non-performing loans as shown by the non-performing loans (NPL), gross and net, of 7.27% and 4.08% from 7.58% and 4.91%, respectively. Furthermore, the compliance ratio is maintained, as indicated by zero violations of the legal lending limit (LLL).

Meanwhile, the sharia segment performance of Bank Victoria Syariah as a Subsidiary showed a decline in operational performance. Total third-party deposits decreased by 11.40% to Rp1.22 trillion from Rp1.38 trillion. Financing also decreased by 30.93% to Rp805.99 billion from Rp1.17 trillion. The operational performance achievement affected revenue from fund management by banks as users of funds which became Rp113.82 billion, a decrease of 26.85% from Rp148.75 billion in the previous year. However, the bank's profit-sharing increased by 24.51% to Rp45.45 billion from Rp36.51 billion, and therefore, sharia segment was able to record income for the year of Rp4.52 billion from loss for the year of Rp215 million in the previous year.

In addition, the main financial performance of sharia segment also remained under control. Capital adequacy ratio increased to 33.21% from 24.69%. Net interest income ratio increased to 2.68% from 1.92%. However, the ratio of financing to third-party deposits became 65.26% from 74.05% with net non-performing financing (NPF) to 3.72% from 3.01% in the previous year.

## Implementation of Bank Governance

In pursuing sound business growth, Bank Victoria continues to strengthen the implementation and management of compliance, risk management, and internal control in all operational and business aspects in accordance with the applicable national and international standards. In pursuing growth in the implementation quality of good corporate governance (GCG), the Bank continues to adequately disseminate and communicate to ensure that awareness of the three main banking GCG functions are embedded in every activity at all levels of the organization. A series of actions and steps to enforce the prudential principle, both preventive (*ex-ante*) and curative (*ex-post*), are taken to ensure the Bank's compliance and reduce business risks while observing the provisions of bank regulators.



Secara konsisten dan berkala, Bank pun terus melakukan pemantauan dan pengukuran kualitas penerapan GCG melalui mekanisme penilaian sendiri. Secara individu maupun konsolidasi, kualitas penerapan GCG telah baik, sebagaimana tercermin dari pelaksanaan tugas dan tanggung jawab organ tata kelola, pelaksanaan fungsi kepatuhan, audit, manajemen risiko, pengelolaan benturan kepentingan, transparansi perbankan, serta perencanaan strategis Bank.

## Penerapan Tanggung Jawab Sosial dan Lingkungan

Kami menyadari bahwa keberlanjutan usaha Bank Victoria merupakan hasil dari pengelolaan aspek sosial dan lingkungan yang terkait dengan seluruh kelompok pemangku kepentingan secara baik dan benar. Dari sisi pemangku kepentingan internal, Bank menjaga kualitas sumber daya manusia (SDM) untuk menyiapkan karyawan yang berorientasi pada kinerja dan berkaliber tinggi sebagai penggerak utama pertumbuhan bisnis Bank. Strategi utama yang ditempuh untuk mencapainya adalah menerapkan budaya berorientasi kinerja, melengkapi kantor cabang dengan tim yang kompeten, serta mengembangkan Victoria Corporate University.

Bagi pemangku kepentingan eksternal, Bank mengupayakan inisiatif yang memberikan manfaat bagi nasabah, masyarakat, dan lingkungan sesuai dengan prinsip keuangan inklusif. Bank melaksanakan praktik keuangan yang berwawasan sosial dan lingkungan hidup, terutama ditunjukkan dari pendanaan pada debitur yang memenuhi syarat kegiatan usaha berkelanjutan. Demikian juga dengan tanggung jawab sosial (CSR) diarahkan kepada program-program yang dapat memberikan manfaat jangka panjang.

## Prospek Usaha

Pertumbuhan ekonomi nasional di tahun 2022 diharapkan akan mampu tumbuh 5,2%–5,8%. Akselerasi pertumbuhan ekonomi ini diperkirakan akan ditopang oleh meningkatnya investasi serta ekspor barang dan jasa sehingga akan meningkatkan kapasitas produksi dan produktivitas berbagai sektor lapangan usaha yang sempat turun karena dampak Covid-19. Seiring dengan membaiknya dunia usaha, sektor jasa keuangan diproyeksikan akan tumbuh pada kisaran 5,5%–5,9% sejalan dengan semakin pulihnya ekonomi nasional pasca pandemi Covid-19, meningkatnya mobilitas masyarakat dan aktivitas ekonomi, percepatan realisasi anggaran pendapatan dan belanja negara dan daerah, bauran kebijakan moneter dan makroprudensial, serta kemajuan restrukturisasi kredit oleh perbankan. Demikian juga halnya dengan kredit dan DPK yang diproyeksikan akan terus bertumbuh.

Menyikapi prospek pertumbuhan ini, Bank Victoria telah menyusun Rencana Bisnis Bank tahun anggaran 2022-2024 dengan arah kebijakan dan strategi pada peningkatan inovasi dan tata kelola untuk menghadirkan kenyamanan transaksi perbankan pada tingkatan yang lebih tinggi. Bank akan meningkatkan inovasi produk dan layanan berbasis digital dengan disertai peningkatan fungsi *monitoring* dan mitigasi

Consistently and periodically, the Bank continues to monitor and measure the quality of GCG implementation through a self-assessment mechanism. Individually and consolidated, the quality of GCG implementation has been good, as reflected in the implementation of the governance organs' duties and responsibilities, implementation of compliance function, audit, risk management, conflict of interest management, banking transparency, and the Bank's strategic planning.

## Implementation of Social and Environmental Responsibility

We realize that Bank Victoria's business sustainability is the result of good and proper management of social and environmental aspects related to all stakeholder groups. In terms of internal stakeholders, the Bank maintains the quality of its human resources (HR) in order to prepare high-caliber and performance-oriented employees as the main drivers of the Bank's business growth. The main strategies adopted to achieve this are by implementing a performance-oriented culture, equipping branch offices with competent teams, and developing Victoria Corporate University.

For external stakeholders, the Bank seeks initiatives that provide benefits to customers, communities, and the environment in accordance with the principles of financial inclusion. The Bank implements financial practices that are socially and environmentally sound, especially indicated by funding to debtors who meet the requirements for sustainable business activities. Likewise, social responsibility (CSR) is directed towards programs that can provide long-term benefits.

## Business Prospects

National economic growth in 2022 is expected to be able to grow by 5.2%-5.8%. The acceleration of economic growth is predicted to be supported by increased investment and exports of goods and services, and thereby, increasing the production capacity and productivity of various business sectors, which had fallen due to the impact of Covid-19. In line with the improvement in the business world, the financial services sector is projected to grow in the range of 5.5%–5.9% along with the increasing national economic recovery post the Covid-19 pandemic, the increasing community mobility and economic activities, the acceleration of realization of state and regional revenue and expenditure budget, the monetary and macroprudential policy mix, and the progress in loan restructuring by banks. Furthermore, loans and third-party deposits are projected to continue to grow.

Responding to this growth prospect, Bank Victoria has prepared a Bank Business Plan for 2022-2024 fiscal year with policies and strategic directions on increasing innovation and governance to bring convenience to banking transactions at a higher level. The Bank will enhance the innovation of digital-based products and services, accompanied by the increase in monitoring and mitigation functions of risk inherent in these

risiko yang melekat pada produk dan layanan tersebut sehingga pada akhirnya dapat meningkatkan *financial value* Bank Victoria dan pemangku kepentingan. Kebijakan dan strategi ini akan ditempuh dengan prinsip kehati-hatian di tengah fleksibilitas dalam menghadapi dinamika bisnis yang tidak pasti.

## Perubahan Komposisi Anggota Direksi

Komposisi Direksi Bank Victoria dipandang telah memadai untuk menjalankan peran pengelolaan perusahaan sesuai peraturan dan kebijakan yang berlaku sehingga tidak terjadi perubahan pada susunan keanggotaan di tahun 2021. Dengan demikian, Direksi yang menjabat meliputi:

Direktur Utama : Ahmad Fajar;  
Wakil Direktur Utama : Rusli;  
Direktur : Lembing;  
Direktur : Debora Wahjutirto Tanoyo;  
Direktur Kepatuhan dan Manajemen Risiko : Tamunan.

## Penutup

Melalui kesempatan ini, kami menyampaikan terima kasih dan apresiasi kepada Pemegang Saham dan seluruh pemangku kepentingan yang telah mendukung perjalanan Bank hingga saat ini. Terima kasih kepada Dewan Komisaris dan komite pendukung Dewan Komisaris yang telah memberikan arahan dan rekomendasi sehingga pengelolaan Bank dapat berjalan di jalur kepatuhan dengan kehati-hatian yang tinggi. Kami juga menyampaikan terima kasih kepada seluruh karyawan, mitra usaha, nasabah, pemerintah dan masyarakat luas yang telah berkontribusi secara langsung maupun tidak langsung bagi pertumbuhan dan keberlanjutan Bank.

Seluruh kepercayaan dan dukungan yang diberikan menjadi semangat dan motivasi kami untuk terus meningkatkan kualitas pengelolaan Bank sehingga dapat meningkatkan nilai dan manfaat berkelanjutan bagi seluruh kelompok pemangku kepentingan.

products and services so that eventually it can increase the financial value of Bank Victoria and its stakeholders. These policies and strategies will be pursued with prudence in the midst of flexibility in dealing with uncertain business dynamics.

## Changes in the Board of Directors' Composition

The composition of Bank Victoria's Board of Directors is deemed adequate to carry out the Company's management role in accordance with the applicable regulations and policies, and therefore, there were no changes to the composition in 2021. Thus, the current members of the Board of Directors are:

President Director : Ahmad Fajar;  
Deputy President Director : Rusli;  
Director : Lembing;  
Director : Debora Wahjutirto Tanoyo;  
Director of Compliance and Risk Management : Tamunan.

## Closing

Through this opportunity, we would like to express our gratitude and appreciation to the Shareholders and all stakeholders who have supported the Bank's journey to date. We are grateful to the Board of Commissioners and the Board of Commissioners' supporting committees who have provided directions and recommendations so that the management of the Bank can proceed on compliance path with high prudence. We also express our gratitude to all employees, business partners, customers, government, and the wider community who have contributed directly or indirectly to the Bank's growth and sustainability.

All the trust and support given became our spirit and motivation to continue to improve the Bank's management quality so that it can increase sustainable value and benefits for all stakeholder groups.

Jakarta, Mei 2022  
Jakarta, May 2022

Atas nama Direksi PT Bank Victoria International Tbk  
On behalf of the Board of Directors PT Bank Victoria International Tbk



**Ahmad Fajar**  
Direktur Utama  
President Director

## Direksi

### Board of Directors



#### 1. Ahmad Fajar

Direktur Utama  
President Director

#### 2. Rusli

Wakil Direktur Utama  
Deputy President Director

#### 3. Lembing

Direktur Bisnis  
Director of Business

#### 4. Debora Wahjutirto Tanoyo

Direktur Keuangan  
Director of Finance

#### 5. Tamunan

Direktur Kepatuhan dan  
Manajemen Risiko  
Director of Compliance  
and Risk Management

# Tanggung Jawab Laporan Tahunan

## Annual Report Responsibility

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### Surat Pernyataan Anggota Dewan Komisaris tentang Tanggung Jawab atas Laporan Tahunan 2021 PT Bank Victoria International Tbk

#### Statement of Members of the Board of Commissioners on the Responsibility for the 2021 Annual Report of PT Bank Victoria International Tbk

Kami, yang bertanda tangan di bawah ini, menyatakan bahwa semua informasi dalam Laporan Tahunan PT Bank Victoria International Tbk tahun 2021 telah dimuat secara lengkap dan bertanggung jawab penuh atas kebenaran isi Laporan Tahunan Bank.

We, the undersigned, hereby declare that all information in the Annual Report of PT Bank Victoria International Tbk for year 2021 has been fully contained and we shall be fully responsible to the correctness of contents in the Annual Report of the Bank.

Demikian pernyataan ini dibuat dengan sebenarnya.

This statement is hereby made in all truthfulness.

Jakarta, 12 Mei 2022  
Jakarta, 12 May 2022

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**Dewan Komisaris**  
Board of Commissioners

---



**Oliver Simorangkir**  
Komisaris Utama  
President Commissioner



**Gunawan Tenggarahardja**  
Komisaris/Komisaris Independen  
Commissioner/Independent Commissioner



**Zaenal Abidin, PhD**  
Komisaris/Komisaris Independen  
Commissioner/Independent Commissioner

**Surat Pernyataan Anggota Direksi tentang Tanggung Jawab  
atas Laporan Tahunan 2021 PT Bank Victoria International Tbk**

**Statement of Members of the Board of Directors on the Responsibility  
for the 2021 Annual Report of PT Bank Victoria International Tbk**

Kami, yang bertanda tangan di bawah ini, menyatakan bahwa semua informasi dalam Laporan Tahunan PT Bank Victoria International Tbk tahun 2021 telah dimuat secara lengkap dan bertanggung jawab penuh atas kebenaran isi Laporan Tahunan Bank.

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This statement is hereby made in all truthfulness.

Jakarta, 12 Mei 2022

Jakarta, 12 May 2022

---

**Direksi**  
Board of Directors

---



**Ahmad Fajar**

Direktur Utama  
President Director



**Rusli**

Wakil Direktur Utama  
Deputy President Director



**Tamunan**

Direktur Kepatuhan dan Manajemen Risiko  
Director of Compliance and Risk Management



**Leming**

Direktur Bisnis  
Director of Business



**Debora Wahjutirto Tanoyo**

Direktur Keuangan  
Director of Finance





# Profil Perusahaan

## Company Profile

### Fasilitas Perbankan Bank Victoria Bank Victoria's Banking Facilities



Kantor Pusat  
Head Office



Kartu ATM Bank Victoria yang dapat digunakan pada lebih dari 120 ribu ATM bank peserta jaringan prima.

Bank Victoria's ATM card can be used at more than 120 thousand ATMs of banks participating in prima network.



Kantor Cabang  
Branch Offices



Nasabah dapat bertransaksi di seluruh mesin EDC bank seluruh Indonesia berlogo GPN.

Customers can make transactions at all banks' EDC machines throughout Indonesia with GPN logo.



Kantor Cabang Pembantu  
Sub-branch Offices



Layanan *Internet Banking* dan *Mobile Banking*.

Internet Banking and Mobile Banking services.





# Identitas Perusahaan

## Corporate Identity



### Nama Perusahaan

Company Name

**PT Bank Victoria International Tbk**



### Alamat

Address

**Gedung Graha BIP Lt. 10**  
 Graha BIP Building 10<sup>th</sup> Floor  
 Jl. Gatot Subroto Kav. 23  
 Jakarta Selatan, 12930  
 T : (021) 5228 888  
 F : (021) 5228 777  
 E : corsec@victoriabank.co.id  
 W : www.victoriabank.co.id



### Dasar Hukum Pendirian

Legal Base of Establishment

Didirikan dengan nama PT Bank Victoria pada tanggal 28 Oktober 1992 berdasarkan Akta Notaris Amrul Partomuan Pohan, SH, LLM No. 71 yang selanjutnya diadakan pembetulan dengan Akta No. 30 tanggal 8 Juni 1993 dari notaris yang sama. Akta pendirian tersebut disahkan oleh Menteri Kehakiman Republik Indonesia melalui Surat Keputusan No. C2-4903.HT.01.01.TH.93 tanggal 19 Juni 1993 dan telah didaftarkan pada Kepaniteraan Pengadilan Negeri Jakarta Utara No. 342/Leg/1993 tanggal 29 Juni 1993 serta telah diumumkan dalam Berita Negara Republik Indonesia No. 39, Tambahan No. 2602 tanggal 15 Mei 1998.

Incorporated under the name PT Bank Victoria on 28 October 1992, based on Notarial Deed No. 71 of Amrul Partomuan Pohan, SH, LLM, which was subsequently amended by Deed No. 30 dated 8 June 1993 of the same notary. The deed of incorporation was approved by the Minister of Justice of the Republic of Indonesia in its Decision Letter No. C2-4903.HT.01.01.TH.93 dated 19 June 1993, was registered at the Clerk Office of North Jakarta District Court under No. 342/Leg/1993 dated 29 June 1993, and was published in Supplement No. 2602 to the Official Gazette of the Republic of Indonesia No. 39 dated 15 May 1998.



### Tanggal Pendirian

Date of Establishment

28 Oktober 1992  
 28 October 1992



### Bidang Usaha

Line of Business

Bank Umum  
 Commercial Bank

### Kepemilikan Saham

Share Ownership

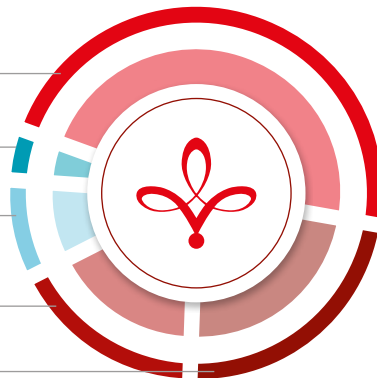
39.37%

3.77%

7.44%

14.67%

34.75%



- PT Victoria Investama Tbk
- Suzanna Tanojo
- Masyarakat / Public <5%
- PT Nata Patindo
- DEG-Deutsche Investitions-Und Entwicklungsgesellschaft MbH



### Lembaga Pencatatan Saham

Registration and Trading Institution

**Bursa Efek Indonesia**  
Indonesia Stock Exchange  
Jakarta Stock Exchange Building Tower I  
Jl. Jenderal Sudirman Kav. 52-53  
Jakarta, 12190



### Kode Saham

Ticker Code

**BVIC**



### Tanggal Pencatatan Saham

Share Listing Date

30 Juni 1999  
30 June 1999



### Modal Dasar

Authorized Capital

**Rp1,400,000,000,000,-**



### Modal Ditempatkan dan Disetor Penuh

Subscribed and Fully Paid-Up Capital

**Rp1,048,713,256,800,-**



### Total Karyawan 2021

Total Employees in 2021

(Tetap, Kontrak, dan *Outsourcing*)  
(Permanent, Contract, and Outsourcing)



**368**

orang / people

**Pria**  
Male



**326**

orang / people

**Wanita**  
Female



### Media Sosial

Social Media



@bankvictoria



Bank Victoria



BankVictoriaID



PT Bank Victoria International Tbk



### Entitas Anak

Subsidiary

**PT Bank Victoria Syariah**  
Gedung Graha BIP Lt. 5  
Graha BIP Building 5<sup>th</sup> Floor  
Jl. Gatot Subroto Kav. 23  
Jakarta Selatan, 12930  
T : (021) 5600 467  
(021) 5225 285 (*Hunting*)  
F : (021) 5664 247  
E : corsec@bankvictoriasyariah.co.id  
W : www.bankvictoriasyariah.co.id

#### Catatan / Note:

Bank tidak melakukan perubahan nama pada tahun 2021.  
The Bank did not change its name in 2021.

## Riwayat Singkat Brief History

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“

**Pada 7 Mei dan 10 Desember 2021, Bank telah melaksanakan Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD). Penguatan struktur permodalan ini akan meningkatkan jumlah saham yang beredar serta meningkatkan likuiditas perdagangan atas saham Bank.**

On 7 May and 10 December 2021, the Bank conducted Capital Increase Without Pre-emptive Rights (PMTHMETD). This capital structure strengthening will increase the number of outstanding shares and increase trading liquidity on the Bank's shares.

”

Bank Victoria telah berdiri selama lebih dari 29 tahun untuk menjalankan kegiatan operasional di bidang bank umum. Pada tahun 1997, Bank Victoria memperluas portofolio layanan dengan memperdagangkan valuta asing. Kemudian, seiring dengan berkembangnya kinerja produk dan layanan Bank di kelompok BUKU II, maka pada tahun 2017, Bank Victoria mulai menyediakan layanan bank devisa.

Dalam rangka memperkuat permodalan dan menjaga tingkat kesehatan keuangan, Bank melakukan penawaran umum saham perdana dan mencatatkan saham di Bursa Efek Surabaya (sekarang Bursa Efek Indonesia) pada tahun 1999 dengan kode saham "BVIC". Langkah ini mengubah status Bank menjadi perusahaan terbuka. Sejak saat itu, Bank aktif melaksanakan berbagai aksi korporasi, seperti penawaran umum terbatas dan penerbitan obligasi.

Bank Victoria has been incorporated for more than 29 years to carry out commercial bank operational activities. In 1977, Bank Victoria expanded its service portfolio by conducting foreign exchange trading. Thereafter, in line with the development of the Bank's products and services performance in BUKU II group, Bank Victoria started to provide foreign exchange services in 2017.

In order to strengthen its capital and maintain the financial soundness rating, the Bank conducted an initial public offering and listed its share on Surabaya Stock Exchange (now Indonesia Stock Exchange) in 1999 with the ticker code "BVIC". This step changed the Bank's status into a public company. Since then, the Bank has actively conducted various corporate actions, such as limited public offering and bond issuance.

Dalam perjalanan usaha, Bank Victoria melakukan ekspansi dengan mengakuisisi 99,80% saham Bank Swaguna. Akuisisi ini menjadikan Bank Swaguna sebagai Entitas Anak Bank Victoria. Bank Swaguna kemudian berubah nama menjadi PT Bank Victoria Syariah pada 19 Januari 2010 dan mulai melakukan kegiatan usaha bank umum dengan prinsip syariah sejak tanggal 1 April 2010, setelah memperoleh izin dari Bank Indonesia.

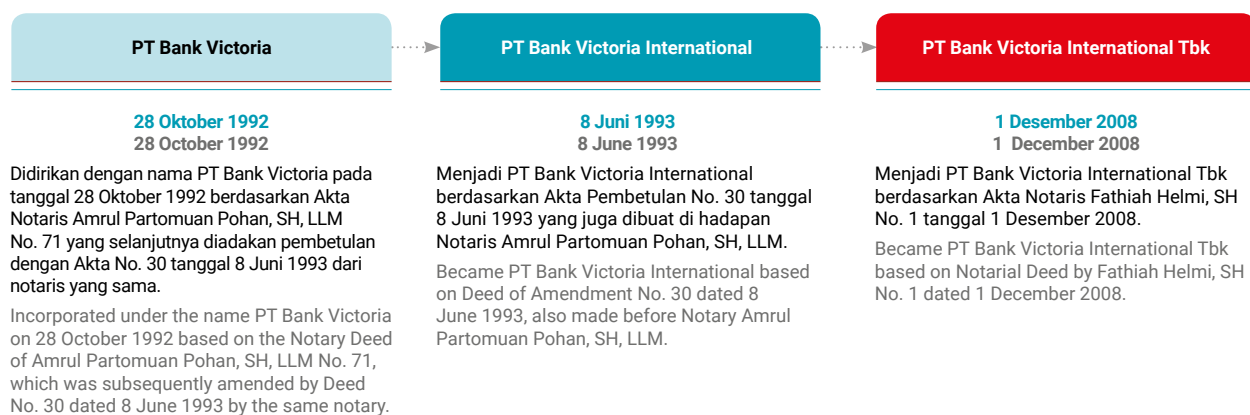
Selanjutnya, guna memenuhi ketentuan modal inti minimum Rp2 triliun per 31 Desember 2021, sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2020 tentang Konsolidasi Bank Umum, pada 7 Mei 2021 dan 10 Desember 2021, Bank telah melaksanakan Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD). Penguatan struktur permodalan ini akan meningkatkan jumlah saham yang beredar serta meningkatkan likuiditas perdagangan atas saham Bank.

In its business venture, Bank Victoria made an expansion by acquiring 99.80% of Bank Swaguna's shares. This acquisition transformed Bank Swaguna to be Bank Victoria's subsidiary. Bank Swaguna later changed its name to PT Bank Victoria Syariah on 19 January 2010 and started its commercial banking business activities under sharia principles on 1 April 2010, after obtaining license from Bank Indonesia.

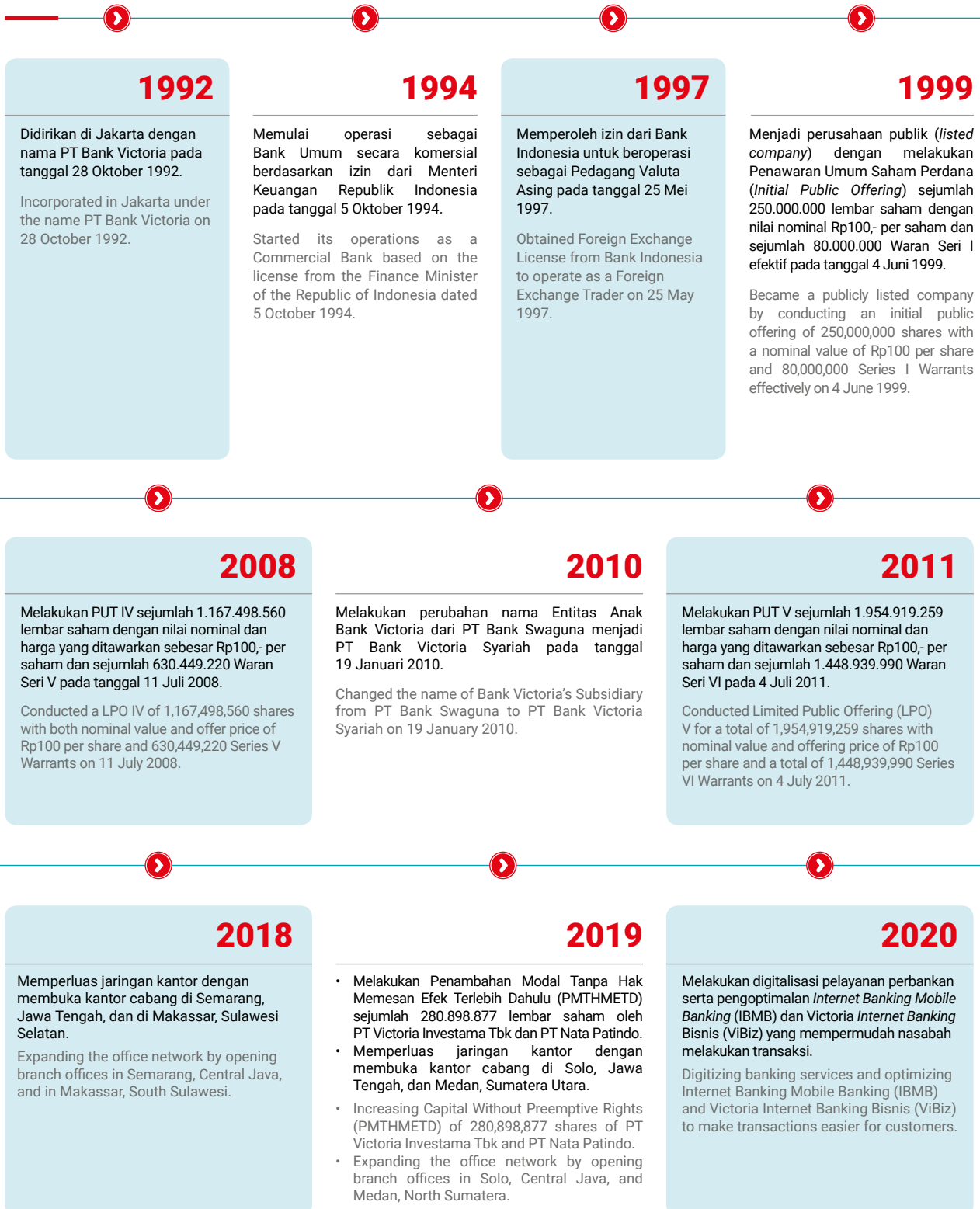
Thereafter, in order to meet minimum core capital requirement of Rp2 trillion as of 31 December 2021 as governed under in Financial Services Authority Regulation No. 12/POJK.03/2020 on Consolidation of Commercial Banks, on 7 May 2021 and 10 December 2021, the Bank has carried out Capital Increase Without Pre-Emptive Rights (PMTHMETD). The strengthening of capital structure increases the number of outstanding shares and raises the trading liquidity of the Bank's shares.

## Dasar Hukum Perubahan Nama

## Legal Basis of Name Change



## Jejak Langkah Milestones



## 2000

Melakukan penawaran umum terbatas (PUT) I sejumlah 614.000.000 lembar saham dengan nilai nominal sebesar Rp100,- per saham dengan harga yang ditawarkan sebesar Rp115,- per saham dan sejumlah 85.960.000 Waran Seri II pada tanggal 28 September 2000.

Conducted a limited public offering (LPO) I of 614,000,000 shares with a nominal value of Rp100 per share offered at Rp115 per share and 85,960,000 Series II Warrants on 28 September 2000.

## 2003

Melakukan PUT II sejumlah 705.243.360 lembar saham dengan nilai nominal dan harga yang ditawarkan sebesar Rp100,- per saham dan sejumlah 423.146.016 Waran Seri III pada tanggal 20 Maret 2003.

Conducted a LPO II of 705,243,360 shares with both nominal value and offer price of Rp100 per share and 423,146,016 Series III Warrants on 20 March 2003.

## 2006

Melakukan PUT III sejumlah 670.363.760 lembar saham dengan nilai nominal Rp100,- per saham dengan harga yang ditawarkan sebesar Rp115,- per saham dan sejumlah 469.277.676 Waran Seri IV pada tanggal 13 Juli 2006.

The Bank conducted a LPO III of 670,363,760 shares with a nominal value of Rp100 per share offered at Rp115 per share and 469,277,676 Series IV Warrants on 13 July 2006.

## 2007

Mengakuisisi PT Bank Swaguna sebagai Entitas Anak.

Acquired PT Bank Swaguna as a Subsidiary.

## 2016

- Memperoleh izin operasional sebagai Bank Devisa berdasarkan Surat Kepala Departemen Perizinan dan Informasi Perbankan Otoritas Jasa Keuangan No. S-423/PB.12/2016 pada tanggal 13 Desember 2016.
- Memberikan layanan transaksi dalam valuta asing yang meliputi transaksi pengiriman uang (*remittance*), perdagangan internasional (*trade finance*), *treasury* serta layanan interbank lainnya setelah menjadi Bank Devisa.
- Melakukan Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) sebesar 9,00% oleh DEG Deutsche Investitions-Und Entwicklungsgesellschaft MbH.
- Obtained operational license as a Foreign Exchange Bank based on the Letter of Banking Licensing and Information Department Head of the Financial Services Authority No. S-423/PB.12/2016 dated 13 December 2016.
- Providing transaction services in foreign currencies which include remittance transactions, international trade (trade finance), treasury, and other interbank services after becoming a Foreign Exchange Bank.
- Conducting Capital Addition Without Preemptive Rights (PMTHMETD) of 9.00% by DEG Deutsche Investitions-Und Entwicklungsgesellschaft MbH.

## 2021

- Melakukan Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) sejumlah 586.205.939 lembar saham oleh PT Victoria Investama Tbk, PT Victoria Insurance Tbk, PT Victoria Alife Indonesia, PT Prolestari Megapersada, PT Regis Pratama Indonesia dan PT Emperor Finance Indonesia.
- Melakukan Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) sejumlah 948.979.590 lembar saham oleh PT Victoria Investama Tbk, PT Victoria Alife Indonesia, PT Victoria Insurance Tbk, PT Victoria Sekuritas Indonesia, PT Regis Pratama Indonesia, PT Tridaya Investindo, PT Emperor Finance Indonesia, dan PT Bhuwanatala Indah Permai Tbk.
- Conducting Capital Addition Without Pre-emptive Rights (PMTHMETD) of 586,205,939 shares by PT Victoria Investama Tbk, PT Victoria Insurance Tbk, PT Victoria Alife Indonesia, PT Prolestari Megapersada, PT Regis Pratama Indonesia, and PT Emperor Finance Indonesia.
- Conducting Capital Addition Without Pre-emptive Rights (PMTHMETD) of 948,979,590 shares by PT Victoria Investama Tbk, PT Victoria Alife Indonesia, PT Victoria Insurance Tbk, PT Victoria Sekuritas Indonesia, PT Regis Pratama Indonesia, PT Tridaya Investindo, PT Emperor Finance Indonesia, and PT Bhuwanatala Indah Permai Tbk.



## FILOSOFI LOGO LOGO PHILOSOPHY

bank  victoria

Bentuk logo huruf "V" yang di atasnya terdapat mahkota dengan tiga lengkungan di setiap sudutnya merupakan penggambaran pada pertumbuhan yang dicapai melalui manajemen yang prudent, sentuhan layanan pribadi, dan pengembangan produk inovatif.

the logo shape of the letter "V" which is topped with a crown with three arches in each corner illustrates the growth achieved through prudent management, a touch of personal service, and innovative product development.



Bentuk logo "titik" di bagian bawah merupakan simbol dari kepercayaan yang telah mengakar dan dipupuk terus menerus.

The shape of "point" at below of the Logo is a symbol of trust that has been rooted and nurtured continuously.

Logo Bank Victoria merupakan sebuah simbol yang menggambarkan kekuatan karakter perusahaan secara utuh dan jelas. Logo Bank Victoria terinspirasi dari perkembangan yang lebih baik dan menyeluruh yang dilakukan oleh Bank Victoria, serta kepercayaan yang telah ditanamkan sejak dulu yang pada akhirnya mulai menunjukkan hasil.

Bank Victoria's logo is a symbol that illustrates the coherent and clear strength of the Company's character. Bank Victoria's Logo was inspired from the Bank's improved and comprehensive development, as well as the beliefs embedded right from the start, which is proven to be fruitful over the years.

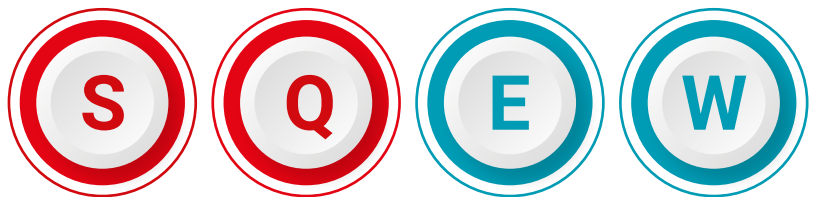
## Visi dan Misi Perusahaan Company's Vision and Mission

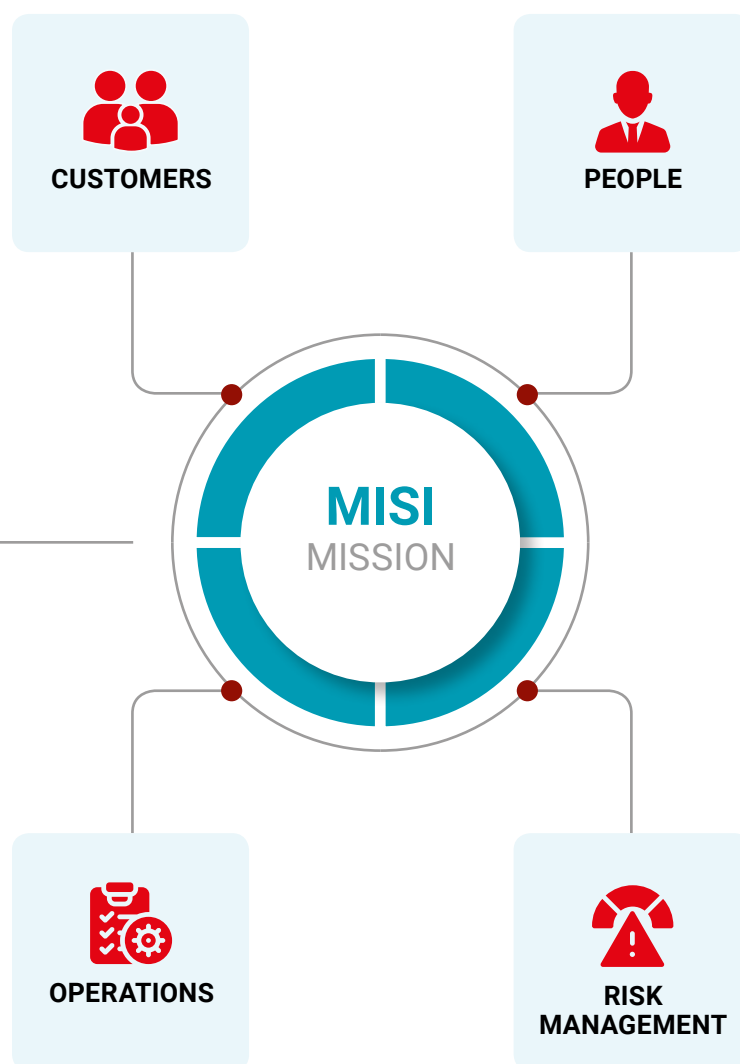


**"Menjadi bank pilihan nasabah yang terpercaya, sehat dan efisien, dan mendukung pertumbuhan berkelanjutan."**

"To become the customers' preferred Bank, which is trustworthy, sound and efficient, and supports sustainable growth."

## Nilai Budaya Perusahaan Corporate Cultural Values





**Safe**

Melakukan transformasi *digital banking* yang harus diperkuat keamanannya sehingga membuat nasabah merasa aman dalam menyimpan uang.

Performing a digital banking transformation with obligation to strengthen the security, so that customers feel safe in depositing their money.

**Quick**

Dengan dilakukannya transformasi *digital*, respon atas keluhan nasabah dapat cepat diselesaikan.

With digital transformation, responses to customer complaints can be promptly resolved.

**Easy**

Teknologi *digital banking* dibuat agar lebih mudah digunakan, sehingga nasabah mudah dalam melakukan transaksi dan pengelolaan keuangan.

Digital banking technology is made for easy use, to ensure customers convenience in carrying out transactions and managing their finances.

**Warm**

Dengan basis *digital banking*, membuat nasabah merasa nyaman dan dekat dengan Bank.

With a digital banking base, customers will feel comfortable and close to the Bank.

## Visi

Visi tersebut mengandung makna penting sebagai berikut.

## Vision

The Vision contains important meaning as follows.

### PILIHAN NASABAH CUSTOMERS' PREFERRED



Bank Victoria dikenal, dipercaya, serta menjadi pilihan nasabah untuk memenuhi kebutuhan nasabah dalam mendapatkan produk dan layanan perbankan.

Bank Victoria is recognized, trusted, and preferred by customers to fulfill their needs in obtaining banking products and services.

### TERPERCAYA TRUSTWORTHY



Bank Victoria berkomitmen menjadi bank yang dapat memberikan rasa aman dan kepastian bagi para nasabah, karyawan, Pemegang Saham, dan pemangku kepentingan lainnya.

Bank Victoria is committed to being the Bank that can provide security and certainty to the customers, human capital, Shareholders, and other stakeholders.

### SEHAT DAN EFISIEN SOUND AND EFFICIENT



Bank Victoria mempunyai struktur modal yang kuat, kondisi keuangan yang sehat, serta didukung oleh operasional perbankan yang efisien.

Bank Victoria has strong capital structure, sound financial condition, and is supported by efficient banking operation.

### MENDUKUNG PERTUMBUHAN BERKELANJUTAN SUPPORT SUSTAINABLE GROWTH



Bank Victoria senantiasa memperhatikan pembangunan yang mengedepankan aspek manusia (*people*), lingkungan (*planet*), dan nilai bagi pemangku kepentingan (*profit*).

Bank Victoria always pays attention to developments that prioritize aspects of people, environment (*planet*), and value for stakeholders (*profit*).

Dengan demikian, diharapkan Bank Victoria dapat menjadi bank pilihan nasabah yang dapat dipercaya oleh nasabah, karyawan, pihak regulator, kalangan perbankan, baik nasional maupun internasional, mitra bisnis, dan pemangku kepentingan lainnya, serta memiliki struktur modal yang kuat, kondisi keuangan yang sehat, dan didukung oleh operasional perbankan yang efisien, yang senantiasa mendukung pertumbuhan dengan mengedepankan aspek manusia, lingkungan, dan nilai bagi pemangku kepentingan.

Therefore, it is expected that Bank Victoria can be the customers' preferred bank, trusted by customers, employees, regulators, banking communities, either national or international level, business partners, and other stakeholders, and has strong capital structure, sound financial conditions, and supported by efficient banking operation, which continuously encourages growth by promoting the aspects of human, environment, and value for the stakeholders.

## Misi

Bank Victoria menjelaskan misinya dengan menggunakan pendekatan pada 4 (empat) kelompok yang berkaitan langsung dengan pelaksanaan aktivitas operasionalnya, yaitu:

## Mission

Bank Victoria explains its mission by using an approach to 4 (four) groups that are directly related to the implementation of its operational activities, which are:



Visi dan Misi Bank Victoria sebagaimana telah disetujui oleh Dewan Komisaris dan Direksi berdasarkan Surat Keputusan Direksi No. 002/SK-DIR/10/19 tanggal 11 Oktober 2019 tentang Visi dan Misi Bank.

### Tinjauan Ulang Visi dan Misi oleh Dewan Komisaris dan Direksi

Dalam rangka memastikan relevansi Visi dan Misi Bank dengan perkembangan usaha saat ini dan tujuan pengembangan di masa yang akan datang, Dewan Komisaris dan Direksi secara berkala melakukan tinjauan terhadap Visi dan Misi Bank. Pada tahun 2021, tidak terdapat perubahan Visi dan Misi Bank.

Bank Victoria's Vision and Missions as approved by the Board of Commissioners and Board of Directors based on the Board of Directors' Decision Letter No. 002/SK-DIR/10/19 dated 11 October 2019.

### Review of Vision and Mission by the Board of Commissioners and Board of Directors

In order to ensure the relevance of the Bank's Vision and Mission with the current business development and future development objectives, the Board of Commissioner and Board of Directors periodically review the Bank's Vision and Mission. In 2021, there were no changes of the Bank's Vision and Mission.

## Nilai Budaya Perusahaan

Dengan ditetapkan SQUEW sebagai Nilai Budaya Bank Victoria yang baru, Bank telah membentuk 9 (sembilan) *Digital Culture* sebagai berikut.

## Corporate Cultural Values

By establishing SQUEW as the new Bank Victoria's Cultural Value, the Bank has established 9 (nine) Digital Cultures as follows.

### Digital Culture

#### Berorientasi kepada Nasabah untuk Menciptakan Solusi Baru (SQUEW)

Fokus terhadap pola pikir dari nasabah, sehingga pengembangan produk diupayakan untuk meningkatkan pengalaman nasabah dengan selalu menempatkan diri pada posisi pelanggan.



#### Customer-Oriented to Create New Solutions (SQUEW)

Focus on customer mindset, so that product development is pursued to improve customer experience by always putting oneself in the customer's shoes.

#### Membuat Keputusan, Bukan Menerima Instruksi (SQW)

Karyawan harus bisa mengambil keputusan sesuai kewenangannya, baik secara individu ataupun kolektif, sesuai ketentuan yang berlaku sehingga meningkatkan kepercayaan.



#### Make Decisions, Not Receive Instructions (SQW)

Employees must be able to make decisions according to their authority, either individually or collectively, in accordance with the applicable regulations to increase trust.

#### Berani Mengambil Risiko untuk Menjadi Lebih Baik (QEW)

Karyawan didorong untuk mengambil risiko, gagal dengan cepat, dan belajar dengan cepat, dan mereka tidak disarankan untuk mempertahankan *status quo* karena kebiasaan atau berada dalam zona nyaman.



#### Dare to Take Risks to Be Better (QEW)

Employees are encouraged to take risks, fail quickly, and learn quickly, and they are discouraged from maintaining a status quo out of habit or stay in a comfort zone.

#### Mentalitas Berkelimpahan (EW)

Karyawan harus percaya dan memiliki pola pikir bahwa selalu banyak jalan kecukupan sumber daya dan kesuksesan sebagai jalan keluar dari masalah.



#### Abundance Mentality (EW)

Employees must believe and have a mindset that there are many ways to achieve adequacy of resources and success as a method to resolve problems.

#### Menghasilkan, Memperkenalkan, dan Menerapkan Cara Inovatif dalam Segala Aktivitas (SQUEW)

Karyawan harus memiliki perilaku untuk menghasilkan, memperkenalkan, dan menerapkan berbagai hal-hal yang inovatif dan kreatif yang berguna pada berbagai tingkatan organisasi.



#### Produce, Introduce, and Implement Innovative Ways in All Activities (SQUEW)

Employees must have the mentality to produce, introduce, and implement various innovative and creative matters that are useful at various levels of the organization.

#### Selalu Bicara dengan Data dan Fakta (SQ)

Pembahasan harus berbasis data dan fakta agar setiap keputusan yang diambil diyakini akurat, tepat, cepat, dan mampu menyelesaikan masalah dengan lebih tuntas.



#### Always Talk with Data and Facts (SQ)

Discussions must be based on data and facts so that every decision made is deemed accurate, precise, fast, and able to solve problems more thoroughly.

#### Mengutamakan Eksekusi Setelah Membuat Rencana (QE)

Perencanaan dan pengambilan keputusan harus mengutamakan bagaimana eksekusi bisa dilaksanakan segera. Hal ini harus didukung dengan kecepatan dan mengedepankan perbaikan yang berkelanjutan.



#### Prioritize Execution After Making a Plan (QE)

Planning and decision making must prioritize how it can be executed immediately. This must be supported with speed and prioritize continuous improvement.

#### Bekerja Sama dan Berkolaborasi Jauh Lebih Baik daripada Dikerjakan Sendiri (EW)

Sukses datang melalui kerja kolektif dan berbagi informasi lintas divisi, unit, dan fungsi. *Continuous improvement* membutuhkan tingkat transparansi dan interaksi yang jauh lebih besar daripada yang ditemukan di organisasi tradisional.



#### Cooperate and Collaborate are Better than Working Alone (EW)

Success comes through collective work and information sharing across divisions, units, and functions. Continuous improvement requires a far greater level of transparency and interaction than that of traditional organizations.

#### Hasil Pekerjaan dapat Mudah Terukur (SQ)

Seluruh kinerja harus dapat diukur dengan standar yang telah ditetapkan dan diterapkan secara konsisten dan transparan.



#### Easily-Measured Work Results (SQ)

All performances must be measured by standards set and applied consistently and transparently.

Bank Victoria mengimplementasikan nilai-nilai Budaya Perusahaan tersebut dalam kinerja dan layanan yang ditunjukkan sebagai berikut.

Bank Victoria implements the Corporate Culture values in the performance and services shown as follows.

### 3 No's Principal



#### **No Delay**

Banyaknya gangguan dalam bekerja akan menghambat penyelesaian pekerjaan, maka kita harus menghindari hal-hal yang dapat mengganggu pekerjaan tersebut.

Numerous work interruptions will impede work accomplishment. Thus, we must avoid anything that is potentially disruptive to our work.



#### **No Error**

Sebagai manusia kita tidak luput dari kesalahan, termasuk dalam pekerjaan. Namun kesalahan tersebut lebih mengacu kepada kecerobohan bukan sebatas kemampuan.

As humans, we are not free from mistakes, including work mistakes. However, these mistakes tend to be negligence related, rather than being lack of competence.



#### **No Fraud**

*Fraud* terjadi dikarenakan pengendalian internal yang lemah, pemahaman yang kurang terhadap peraturan serta *monitoring* yang lemah.

Fraud occurs due to weak internal control, poor understanding of regulations, and weak monitoring.

### Value Propositions



#### **Speed**

Dengan menghindari gangguan yang dapat memperlambat pekerjaan, maka pekerjaan kita sehari-hari dapat diselesaikan dengan cepat.

By avoiding distractions that can slow down work, our daily work can be completed quickly.



#### **Accurate**

Dengan menghindari kesalahan dalam bekerja kita akan menyajikan hasil pekerjaan dengan data yang akurat.

By avoiding work mistakes, we will present accurate data as our work results.



#### **Control**

Fungsi kontrol adalah membuat suatu hasil pekerjaan berjalan dengan baik, teratur, dan berkembang.

The function of control is to establish a condition in which work will run in a well, orderly, and progressive manner.

### Tinjauan Ulang Nilai Budaya Perusahaan oleh Dewan Komisaris dan Direksi

Dewan Komisaris dan Direksi secara berkala melakukan tinjauan terhadap Nilai Budaya Perusahaan. Pada tahun 2021, tinjauan Nilai Budaya Perusahaan telah dievaluasi bersamaan dengan persetujuan Rencana Bisnis Bank Periode Tahun 2021-2023. Telah ditetapkan Nilai Budaya Bank, yaitu SQEW.

### Review of Corporate Cultural Values by the Board of Commissioners and Board of Directors

The Board of Commissioners and Board of Directors periodically review the Corporate Cultural Values. In 2021, the Corporate Cultural Values were evaluated in conjunction with the approval of the Bank Business Plan for 2021-2023. The Bank's Cultural Values have been established, namely SQEW.



## Bidang Usaha Line of Business



**“Bank Victoria menjalankan kegiatan usaha sebagai bank umum konvensional dan menyediakan layanan perbankan syariah melalui Entitas Anak.”**

“Bank Victoria runs business activities as a conventional commercial bank and provides sharia banking services through its Subsidiary.”



Sesuai dengan Pasal 3 Anggaran Dasar Bank, ruang lingkup kegiatan Bank adalah menjalankan usaha sebagai bank umum dalam arti kata seluas-luasnya sesuai dengan ketentuan yang berlaku. Untuk mencapai maksud dan tujuan tersebut, Bank dapat melakukan kegiatan usaha sebagai berikut.

Pursuant to Article 3 of the Bank’s Articles of Association, the scope of the Bank activities is to run a commercial bank in the broadest possible meaning in accordance with the applicable provisions. To achieve its purpose and objective, the Bank can conduct business activities as follows.

### Kegiatan Usaha Utama

### Main Business Activities

Kegiatan Usaha Berdasarkan Anggaran Dasar	Kegiatan Usaha yang Dijalankan Bank Victoria Business Activities Run by Bank Victoria		Business Activities Based on Articles of Association
	Sudah Done	Belum Not Done	
Menghimpun dana dari masyarakat dalam bentuk simpanan giro, deposito berjangka, sertifikat deposito, tabungan, dan/atau bentuk lainnya yang dipersamakan dengan itu.	✓		Collect funds from the society in the form of current accounts, time deposits, certificates of deposit, savings, and/or other forms equivalent.
Memberikan kredit, baik kredit jangka menengah, panjang atau pendek, maupun jenis lainnya yang lazim dalam dunia perbankan.	✓		Provide credits, whether medium-term, long-term, or short-term, and other types prevalent in the banking world.
Menerbitkan surat pengakuan utang.	✓		Issue debt certificates.
Membeli, menjual atau menjamin atas risiko sendiri maupun untuk kepentingan dan atas perintah nasabahnya: a. Surat-surat wesel, termasuk wesel yang diakseptasi oleh Bank yang masa berlakunya tidak lebih lama dari kebiasaan dalam perdagangan surat-surat tersebut; b. Surat pengakuan utang dan kertas dagang lainnya yang masa berlakunya tidak lebih lama dari kebiasaan dalam perdagangan surat-surat tersebut; c. Kertas perbendaharaan Negara dan surat jaminan pemerintah; d. Sertifikat Bank Indonesia; e. Obligasi; f. Surat promes yang dapat diperdagangkan dengan berjangka waktu sampai dengan 1 (satu) tahun; dan g. Surat berharga lain yang berjangka waktu sampai dengan 1 (satu) tahun.	✓		Buy, sell, or guarantee on own risk and for the interest and upon the order of its customers:  a. Money orders, including accredited money orders by the Bank in which the validity period is not longer than the custom of the trade of such papers;  b. Debt certificates and other trade papers in which the validity period is not longer than the custom of the trade of such papers;  c. State treasury bills and government guarantee letter;  d. Bank Indonesia Certificates; e. Bonds; f. Short-term tradeable promissory notes with validity period of up to 1 (one) year; and g. Other securities with validity period of up to 1 (one) year.
Memindahkan uang, baik untuk kepentingan sendiri maupun untuk kepentingan nasabah.	✓		Transfer of money, both for own interest and for the customers’ interest.
Menempatkan dana pada, meminjam dana dari, atau meminjamkan dana kepada bank lain, baik dengan menggunakan surat, sarana telekomunikasi maupun dengan wesel unjuk, cek, atau sarana lainnya.	✓		Place funds in, borrow funds from, or lend funds to other banks, either by mail, telecommunication means, or by sight draft, check, or other means.

Kegiatan Usaha Berdasarkan Anggaran Dasar	Kegiatan Usaha yang Dijalankan Bank Victoria Business Activities Run by Bank Victoria		Business Activities Based on Articles of Association
	Sudah Done	Belum Not Done	
Menerima pembayaran dari tagihan atas surat berharga dan melakukan perhitungan dengan atau antara pihak ketiga.	✓		Receive payments from claims on securities and perform calculations with or between third parties.
Melakukan penempatan dana dari nasabah kepada nasabah lainnya dalam bentuk surat berharga yang tercatat di bursa efek.	✓		Perform placement of funds from a customer to another customer in the form of securities listed in stock exchange.
Melakukan kegiatan dalam valuta asing dengan memenuhi ketentuan yang ditetapkan oleh Bank Indonesia.	✓		Perform activities in foreign currencies by meeting the provisions stipulated by Bank Indonesia.
Menyediakan pembiayaan dan/atau melakukan kegiatan lain, termasuk kegiatan berdasarkan prinsip syariah sesuai dengan ketentuan yang ditetapkan oleh Bank Indonesia.	✓		Provide financing and/or perform other activities including activities based on sharia principles in accordance with the provisions stipulated by Bank Indonesia.

## Kegiatan Usaha Penunjang

## Supporting Business Activities

Kegiatan Usaha Berdasarkan Anggaran Dasar	Kegiatan Usaha yang Dijalankan Bank Victoria Business Activities Run by Bank Victoria		Business Activities Based on Articles of Association
	Sudah Done	Belum Not Done	
Menyediakan tempat untuk menyimpan barang dan surat berharga.		✓	Provide place for storing valuables and securities.
Melakukan kegiatan penitipan untuk kepentingan pihak lain berdasarkan suatu kontrak.		✓	Conduct custodial activities for the benefits of others under a contract.
Membeli agunan, baik semua maupun sebagian, melalui pelelangan dalam hal debitur tidak memenuhi kewajibannya kepada perusahaan, dengan ketentuan agunan yang dibeli tersebut wajib dicairkan secepatnya.		✓	Purchase a collateral, either in whole or in part, through an auction in the event that the debtor cannot meet its obligations to the company, provided that the purchased collateral must be disbursed immediately.
Melakukan kegiatan anjak piutang, usaha kartu kredit, dan kegiatan wali amanat.		✓	Perform factoring activities, credit card business, and trustee activities.
Melakukan kegiatan sebagai penyelenggara dana pensiun sesuai dengan peraturan perundang-undangan yang berlaku, baik selaku pendiri dana pensiun pemberi kerja maupun selaku pendiri dan/atau peserta dana pensiun lembaga keuangan.	✓		Conduct activities as the Pension Fund organizers in accordance with the applicable laws and regulations, either as the founder of the employer's pension fund or as the founder and/or participant of the pension fund of a financial institution.
Melakukan kegiatan penyertaan modal pada bank atau perusahaan lain di bidang keuangan, sewa guna usaha, perusahaan modal ventura, perusahaan efek, perusahaan asuransi, lembaga kliring dan penjamin, serta lembaga penyimpanan dan penyelesaian dengan memenuhi ketentuan yang ditetapkan oleh instansi yang berwenang.	✓		Conduct equity participation in a bank or other company in the field of finance, leasing companies, venture capital firms, securities companies, insurance companies, clearing and guarantee institutions, as well as depository and settlement institutions in compliance with the provisions stipulated by the competent authorities.
Melakukan kegiatan penyertaan modal sementara untuk mengatasi kredit macet, termasuk kegagalan pembiayaan berdasarkan prinsip syariah dengan syarat harus menarik kembali pernyataannya sesuai dengan ketentuan yang ditetapkan oleh Bank Indonesia.	✓		Conduct temporary equity participation to cope with NPL, including financing failure based on sharia principles subject to withdrawal of statements in accordance with the provisions stipulated by Bank Indonesia.
Mengusahakan usaha-usaha lain yang berhubungan langsung atau tidak langsung dengan maksud tersebut di atas yang pelaksanaannya tidak bertentangan dengan undang-undang yang berlaku di Indonesia.		✓	Undertake other business ventures directly or indirectly related to the aforementioned intent in which its implementation is not contradictory with the applicable law in Indonesia.

## Produk dan Jasa Products and Services



**“Kegiatan usaha Bank Victoria meliputi produk simpanan, produk pinjaman, serta berbagai layanan lainnya.”**

“The business activities of Bank Victoria include savings products, loan products, and several other services.”



Uraian produk dan jasa Bank Victoria dijelaskan sebagai berikut.

The description of Bank Victoria products and services is as follows.

### Produk Simpanan / Savings Products

Produk simpanan adalah dana pihak ketiga yang telah dihimpun oleh Bank Victoria melalui berbagai produk tabungan, giro, dan deposito.

Savings products are third-party funds that have been collected by Bank Victoria through various savings, current accounts, and time deposits.



#### Tabungan Savings

##### Tabungan Victoria

Rekening tabungan yang menawarkan kemudahan bertransaksi melalui ATM Victoria yang bekerja sama dengan jaringan ATM Prima, dengan suku bunga yang kompetitif, bebas biaya administrasi bulanan, serta dilengkapi fasilitas *Internet Banking* dan *Mobile Banking* yang dapat dipakai untuk transaksi transfer dana, pembelian, dan pembayaran di berbagai *merchant*.

##### Victoria Savings

A savings account offering easy transactions through Victoria ATM in cooperation with ATM Prima network with competitive interest rate, free monthly administration fee, and supported with internet banking and mobile banking facilities that can be used for transactions of fund transfer, purchases, and payments in various merchants.

##### Tabungan VIP Safe

Rekening tabungan yang digunakan untuk perorangan dengan *tiering* suku bunga yang sangat menarik, bebas biaya administrasi bulanan, sekaligus memberikan manfaat gratis perlindungan asuransi kecelakaan diri hingga maksimum Rp5 miliar. Selain itu, dengan fasilitas *Internet Banking* dan *Mobile Banking* yang diberikan membuat nasabah dapat melakukan transaksi perbankan tanpa harus datang ke kantor cabang.

##### VIP Safe Savings

A savings account reserved for individuals with attractive tiering interest rates, free monthly administration fee, also giving benefits of free personal accident insurance protection up to a maximum of Rp5 billion. In addition, the internet banking and mobile banking facilities allow customers to make banking transactions without having to come to the branch office.

##### Tabungan Victoria Junior

Rekening tabungan bagi nasabah junior dengan hadiah langsung yang menarik, suku bunga yang kompetitif, dan tanpa batasan penarikan.

##### Victoria Junior Savings

A savings account for junior customers with attractive direct gifts, competitive interest rates, and unlimited withdrawals.

##### Tabungan Victoria Bisnis

Rekening tabungan khusus yang disediakan untuk para pelaku bisnis perorangan maupun badan hukum dengan suku bunga yang kompetitif.

##### Victoria Business Savings

A special savings account reserved for business actors, individuals and corporations with competitive interest rates.

**Program V-88**

Penyatuan (*bundling*) produk antara deposito berjangka 3 (tiga) bulan dengan tabungan Victoria, yang dapat memberikan imbal hasil yang menarik untuk deposito berjangka 3 (tiga) bulan, dengan alokasi penempatan nominal yang telah ditentukan dari total penempatannya pada tabungan Victoria yang diblokir selama jangka waktu 3 (tiga) bulan. Program ini juga memberikan manfaat gratis perlindungan asuransi kecelakaan diri hingga maksimum Rp10 miliar.

**TabunganKu**

Rekening tabungan yang digunakan untuk perorangan dengan persyaratan yang mudah dan ringan yang diterbitkan secara bersama oleh bank-bank di Indonesia, sebagai perwujudan untuk menumbuhkan budaya menabung serta meningkatkan kesejahteraan masyarakat.

**Tabungan Victoria Maxima**

Tabungan dengan 2 (dua) keuntungan berupa *cashback* di awal penempatan dan bunga bulanan yang menarik.

**Tabungan Victoria EduSave**

Tabungan untuk perencanaan pendidikan anak dengan tambahan keuntungan berupa asuransi jiwa dan cacat tetap total gratis. Asuransi ini memastikan sisa setoran bulanan tetap terbayarkan sampai dengan masa akhir tabungan, sehingga biaya pendidikan anak di masa depan tetap aman.

**V-88 Program**

A bundling of products between a 3 (three) month time deposit and Victoria savings, that can give attractive yields for a 3 (three) month time deposit, with allocation of nominal placement that has been determined from the total placement in Victoria savings, which shall be blocked for a 3 (three) month period. This program also provides benefits of free personal accident insurance protection up to a maximum of Rp10 billion.

**MySavings**

A savings account reserved for individuals with easy and light requirements issued jointly by banks in Indonesia, as a manifestation for growing a culture of saving and improve people's welfare.

**Victoria Maxima Savings**

A savings account with 2 (two) benefits in the forms of *cashback* at the beginning of placement and attractive monthly interest rates.

**Victoria EduSave Savings**

A current account for children's education plan with additional benefits in the forms of free life insurance and free total permanent disability insurance. This insurance ensures that the remaining monthly deposits are paid until the end of the savings period, so that children's education costs in the future remain safe.



## Giro Current Accounts

**VIP Giro Rupiah dan VIP Giro Valas**

Produk Giro yang diperuntukkan untuk perorangan dan perusahaan yang dapat memberikan imbal hasil yang sangat menarik. Selain itu, dapat digunakan untuk memudahkan nasabah dalam bertransaksi dengan memberikan fasilitas tambahan gratis biaya buku cek/bilyet giro. Dengan menggunakan VIP Giro, nasabah pada segmen bisnis/perusahaan juga dapat menjalankan fasilitas penggajian gratis untuk seluruh karyawan dengan rekening *payroll* di Bank Victoria. Produk ini juga tersedia dalam mata uang Rupiah dan *US Dollar*.

**VIP Rupiah Current Account and VIP Foreign Currency Current Account**

A Demand Deposit product allocated for individuals and corporates that can give a very attractive return. Furthermore, it can be used to facilitate customers in making transactions by providing additional facility of free cheque book/bilyet current account. By using VIP Current Account, customers of business/corporate segment can also run a free payroll facility to all employees with a payroll account in Bank Victoria. This product is also available in Rupiah and US Dollar.



### Deposito Time Deposits

#### Deposito Rupiah

Produk simpanan berjangka dengan mata uang Rupiah yang dapat digunakan untuk nasabah perorangan maupun badan hukum dengan jangka waktu 1 (satu) bulan, 3 (tiga) bulan, 6 (enam) bulan, atau 12 (dua belas) bulan, serta dapat memberikan bunga deposito yang sangat menarik kepada nasabah.

#### Deposito US Dollar

Produk simpanan berjangka dalam bentuk mata uang asing bagi nasabah individu maupun perusahaan. Produk ini tersedia dalam mata uang *US Dollar*.

#### Rupiah Time Deposits

A time deposit product in Rupiah that can be used for individual and legal entity customers with a period of 1 (one) month, 3 (three) months, 6 (six) months, or 12 (twelve) months, and can give a very attractive time deposit interest rate to customers.

#### USD Time Deposits

A time deposit product in foreign currencies for individual and corporate customers. This product is available in *US Dollar*.

## Produk Pinjaman / Loan Products

Produk pinjaman merupakan suatu fasilitas keuangan yang memungkinkan seseorang atau badan usaha untuk meminjam uang untuk membeli produk dan membayarnya kembali dalam jangka waktu yang ditentukan.

Loan product is a financial facility that allows a person or business entity to borrow money to buy product and repay it within a specified time period.



### Kredit Produktif Productive Loans

#### Corporate Lending

Kredit produktif (modal kerja dan investasi) yang diberikan untuk portofolio kredit *high end corporate customers* (termasuk di dalamnya *public listed companies*, perusahaan yang dimiliki oleh konglomerat Indonesia, dan perusahaan nasional) dengan *plafond* diatas Rp50 miliar (Surat Edaran No. 003/SE-DIR/02/18 tanggal 23 Februari 2018), termasuk kredit sindikasi dengan bank-bank besar. Pada segmen kredit ini, sektor industri yang ditargetkan adalah industri manufaktur, *trading*, *property* (*shopping mall*, *office building*, *real estate*, kondominium, *apartment*), transportasi, komunikasi, pertambangan, listrik, dan gas.

#### Commercial Lending

- **Commercial Enterprise and Lending**  
Kredit produktif (modal kerja dan investasi) yang diberikan kepada *high end commercial customers* akan difokuskan pada perusahaan-perusahaan yang memiliki *supply chain/value chain* untuk mendukung *cross selling* kredit segmen lainnya dengan *plafond* diatas Rp15 miliar (Surat Edaran No. 003/SE-DIR/02/18 tanggal 23 Februari 2018) sampai dengan Rp50 miliar. Pola pembiayaan yang diterapkan antara lain *supplier financing*, *AR financing*, dan *inventory financing*.
- **Medium Enterprise Lending**  
Kredit produktif (modal kerja dan investasi) yang diberikan kepada *mid-tier commercial customers* akan difokuskan

#### Corporate Lending

A productive loan (working capital and investment) provided for loan portfolio of high-end corporate customers (including public listed companies, company owned by Indonesian Conglomerates and National Companies) with a credit ceiling above Rp50 billion (Circular No. 003/SE-DIR/02/18 dated 23 February 2018), including syndicated loans with large banks. In this loan segment, the industry sectors targeted are manufacturing industry, trading, property (shopping mall, office building, real estate, condominium, apartment), transportation, communication, mining, electricity, and gas.

#### Commercial Lending

- **Commercial Enterprise and Lending**  
A productive loan (working capital and investment) provided for high-end commercial customers, which will be focused on companies having supply chain/value chain to support cross selling with other loan segment and a credit ceiling above Rp15 billion up to Rp50 billion (Circular No. 003/SE-DIR/02/18 dated 23 February 2018). The financing patterns applied, among others, are supplier financing, AR financing, and inventory financing.
- **Medium Enterprise Lending**  
A productive loan (working capital and investment) provided for mid-tier commercial customers, which will be

untuk penyebaran portofolio *by industry* yang masuk ke dalam kriteria *risk appetite* dari Bank dengan *plafond* di atas Rp1-15 miliar (Surat Edaran No. 003/SE-DIR/02/18 tanggal 23 Februari 2018). Segmen industri yang difokuskan adalah *trading, small manufacturing, dan transportation*.

#### **Small Medium Enterprise Lending**

Kredit produktif (modal kerja dan investasi) yang diberikan kepada debitur dengan *plafond* di atas Rp250 juta sampai Rp1,5 miliar, untuk segmentasi *industry trading, home industry, jasa, bengkel, rumah makan*, termasuk dalam hal ini fasilitas kredit non-organik yang diberikan kepada BPR atau LKBB yang memiliki *customer based* sesuai dengan kriteria Undang-Undang Republik Indonesia No. 20 Tahun 2008 tanggal 4 Juli 2008 tentang usaha mikro, kecil, dan menengah.

#### **Multi Finance Lending**

Kredit yang diperuntukkan bagi perusahaan pembiayaan (*multifinance*) dalam bentuk modal kerja cicilan yang dapat digunakan untuk pembiayaan kepada *end user*, seperti untuk pembiayaan mobil, motor, alat berat, elektronik, dan lain-lain.

#### **Bank Garansi**

Pernyataan yang dikeluarkan oleh Bank atas permintaan nasabah untuk menjamin risiko tertentu yang timbul apabila nasabah tidak dapat menjalankan kewajibannya kepada pihak yang menerima jaminan.

#### **Surat Kredit Berdokumen Dalam Negeri (SKBDN)**

SKBDN dipergunakan untuk mendukung transaksi perdagangan di dalam negeri atau yang sering disebut dengan LC Lokal adalah janji tertulis dan tidak dapat dibatalkan (*irrevocable*) yang diterbitkan oleh Bank pembuka (*Issuing Bank*) atas instruksi dari pemohon (*applicant*) untuk membayar sejumlah uang kepada penerima (*beneficiary*) sepanjang syarat dan kondisi yang tercantum di dalam SKBDN terpenuhi.

focused on spreading portfolio *by industry* included in the criteria of risk appetite from the Bank with the credit ceiling from Rp1-15 billion (Circular No. 003/SE-DIR/02/18 dated 23 February 2018). The industry segments focused are trading, small manufacturing, and transportation.

#### **Small Medium Enterprise Lending**

A productive loan (working capital and investment) granted to debtors with a credit ceiling from Rp250 million to Rp1.5 billion, for segments of trading industry, home industry, services, workshops, restaurants, including in this case non-organic loan facilities provided to Rural Banks (BPR) or Non-Bank Financial Institutions (LKBB) that have customer-based in accordance with the criteria of Law of the Republic of Indonesia No. 20 of 2008 dated 4 July 2008 on micro, small, and medium enterprises.

#### **Multi Finance Lending**

A loan facility reserved for multi finance company in the form of installments of working capital that can be used for financing end users, such as financing for cars, motorcycles, heavy equipment, electronics, etc.

#### **Bank Guarantee**

A statement issued by the Bank at customer's request to guarantee certain risks that arise in the event that the customer cannot meet the obligation to the party receiving the guarantee.

#### **Domestic Letter of Credit (SKBDN)**

SKBDN, which is intended to support domestic trade transactions or is often referred to as Local LC, is a written and irrevocable promise issued by the Issuing Bank upon instructions of the applicant to pay a sum of money to the beneficiary, provided that the terms and conditions stated in the SKBDN are fulfilled.



### **Kredit Konsumtif** Consumptive Loans

#### **Kredit Pemilikan Rumah**

Fasilitas kredit yang diberikan kepada debitur untuk pembelian kembali (*refinancing*), pengambilalihan kredit dari kreditor lain (*take over*) rumah, toko, ruko, rukan, villa, kavling, rusun, kondominium, konstruksi, atau renovasi.

#### **Kredit Pemilikan Mobil**

Fasilitas kredit yang diperuntukkan bagi debitur yang melakukan pembelian mobil dengan pengembaliannya melalui sistem angsuran bulanan.

#### **Home Ownership Loan**

A loan facility reserved for debtors in making a purchase (*refinancing*), taking over credit from another creditor for houses, stores, home stores, office stores, villas, kavlings, flats, condominiums, constructions, or renovations.

#### **Car Ownership Loan**

A loan facility reserved for debtors in making car purchases with monthly installment system.



### Kredit Multi Guna

Fasilitas kredit yang diperuntukan bagi perorangan (wiraswasta, profesional, karyawan) yang berdomisili di wilayah operasional cabang, yang membutuhkan dana yang dapat digunakan untuk konsumsi maupun pengembangan usaha terkait dengan bidang profesinya, serta dapat menyerahkan agunan berupa tanah dan bangunan.

### Multi-Purpose Loan

A loan facility reserved for individuals (entrepreneurs, professionals, employees) domiciled in the branch's operational area requiring funds that can be used for consumptive purposes or business development related to their professional field by turning in collaterals in the form of land and building.

### Kredit Implant Banking

Fasilitas kredit konsumen yang diperuntukan bagi karyawan suatu perusahaan yang dapat dilakukan secara kolektif berdasarkan perjanjian kerja sama antara Bank dengan perusahaan atau koperasi karyawan, maupun perjanjian kredit antara Bank dengan karyawan perusahaan yang bersangkutan.

### Implant Banking Loan

A consumer loan facility reserved for employees of a company that can be done collectively based on a cooperative agreement between the Bank and a company or employees' cooperative, as well as a loan agreement between the Bank and the concerned company employee.

## Produk Investasi / Investment Products

Bank Victoria bekerja sama dengan salah satu mitra distribusi obligasi pemerintah bagi investor ritel di pasar perdana domestik untuk memberikan produk investasi yang dapat meningkatkan nilai portofolio nasabah di Bank.

Bank Victoria cooperates with one of the government bond distribution partners for retail investors in the domestic primary market to provide investment products that can increase customer's portfolio value at the Bank.



### SUN RITEL E-SBN

Obligasi pemerintah untuk investor ritel yang diterbitkan dengan seri ORI016 dengan periode penawaran pada tanggal 2-24 Oktober 2019.

### Retail Government Bonds E-SBN

Government bonds for retail investors issued in ORI016 series and the offering period was on 2 until 24 October 2019.

## Layanan Bank Devisa / Foreign Exchange Bank Services

Selain giro dan deposito, Bank Victoria juga memberikan jasa layanan terkait transaksi dalam valuta asing, antara lain transaksi kiriman uang (*remittance*), perdagangan internasional (*trade finance*), *treasury*, dan layanan interbank lainnya.

In addition to current accounts and time deposits, Bank Victoria also provides transaction-related services in foreign currencies, such as remittance transactions, international trade finance, treasury, and other interbank services.



### Transaksi Kiriman Uang

Bank Victoria menyediakan jasa kiriman uang dalam valuta asing para nasabah yang ditujukan ke rekening yang berada di dalam negeri (*incoming transfer*) maupun luar negeri (*outgoing transfer*) hingga sampai tujuan secara tepat waktu dan aman serta didukung oleh sistem yang handal. Saat ini, Bank Victoria melayani jasa kiriman uang dengan valuta *US Dollar*, *Singapore Dollar*, *Yen*, *Yuan*, dan *Euro*.

### Remittance

Bank Victoria provides remittances in foreign currencies for customers to domestic accounts (*incoming transfers*) or overseas (*outgoing transfers*) to the destination in a timely and safe manner and is supported by a reliable system. At present, Bank Victoria serves money transfers with currencies of *US Dollar*, *Singapore Dollar*, *Yen*, *Yuan*, and *Euro*.

### Perdagangan Internasional

Bank Victoria memberikan pelayanan kepada mitra usaha dalam melakukan transaksi perdagangan dalam negeri dengan menggunakan Surat Kredit Berdokumen Dalam Negeri (SKBDN) dalam mata uang Rupiah dan *Letter of Credit (L/C)* dalam mata uang asing. Dengan didukung 39 Cabang Bank Victoria di seluruh Indonesia, Bank Victoria siap membantu nasabah untuk memperkokoh posisi bisnis nasabah secara nasional.

Transaksi nasabah akan ditangani dengan cepat oleh tenaga-tenaga ahli yang telah berpengalaman menangani transaksi perdagangan dalam negeri. Dengan sistem aplikasi berbasis teknologi yang maju, nasabah cukup mengajukan permohonan transaksi dan mempresentasikan dokumen melalui cabang-cabang Bank Victoria terdekat atau langsung ke Kantor Pusat Divisi *International Banking*.

Untuk jasa layanan dalam perdagangan dalam negeri meliputi:

- Penerbitan SKBDN dan L/C;
- Penerimaan SKBDN dan L/C; dan
- *Collection*.

Melalui Divisi *International Banking*, nasabah akan mendapatkan pelayanan konsultasi bisnis yang dapat membantu nasabah seputar permasalahan perdagangan dalam negeri dengan menggunakan SKBDN maupun perdagangan internasional menggunakan L/C. Selain itu, Bank Victoria juga memberikan pelayanan Bank Garansi kepada mitra usaha.

### Treasury dan Layanan Interbank Lainnya

Bank Victoria memberikan layanan jasa transaksi jual beli *bank notes* dengan mata uang *US Dollar*, *Singapore Dollar*, *Australian Dollar*, *Hongkong Dollar*, *Yen*, *Yuan*, dan *Euro*. Bank Victoria juga memberikan layanan terkait jual beli dan valuta asing dengan jenis transaksi *forward* dalam mata uang *US Dollar*.

### Trade Finance

Bank Victoria provides services to business partners in carrying out Domestic Trade Transactions by using a Domestic Documented Letter of Credit (SKBDN) in Rupiah and Letter of Credit (L/C) in foreign currencies. With the support of 39 Bank Victoria's branch offices throughout Indonesia, Bank Victoria is ready to help customers strengthen their business position nationally.

Customer transactions will be dealt fast by experts who have experience in handling domestic trade transactions. With an advanced technology-based application system, customers simply submit a transaction application and present documents through the nearest branch of Bank Victoria or directly to the International Banking Division at Head Office.

Service products in domestic trade include:

- Issuance of SKBDN and L/C;
- Acceptance of SKBDN and L/C; and
- *Collection*.

Through the International Banking Division, customers will receive business consultation services that can help customers on the issue of domestic trade using SKBDN or international trade using L/C. In addition, Bank Victoria also provides Bank Guarantee services to business partners.

### Treasury and Other Interbank Services

Bank Victoria provides transaction services for buying and selling bank notes in US Dollar, Singapore Dollar, Australian Dollar, Hong Kong Dollar, Yen, Yuan, and Euro. Bank Victoria also provides services related to trading foreign currencies with Forward Transaction type in US Dollar.

## Jasa Layanan Services

Bentuk layanan lainnya yang diberikan oleh Bank Victoria dengan tujuan untuk memberikan kemudahan bagi para nasabah diuraikan sebagai berikut.

Other forms of services provided by Bank Victoria with the purpose of providing convenience for customers are described as follows.



### Kliring/Inkaso Clearing/Payment

Layanan kliring/inkaso yang digunakan untuk penagihan warkat bank lain peserta kliring lokal, di luar wilayah kliring, maupun di luar peserta kliring luar wilayah.

A clearing/payment service used for collecting other bank instruments of local clearing participants, outside the clearing area, or non-clearing participant from outside the area.



### Transfer

Layanan jasa yang digunakan untuk pengiriman dana kepada penerima dana di bank lain.

A service for transferring funds to a beneficiary in another bank.



### Real Time Gross Settlement (RTGS)

Layanan transfer dana melalui fasilitas RTGS dari Bank Indonesia yang dikenakan biaya transfer, namun dapat dipilih untuk dibebankan kepada pengirim atau kepada penerima.

A fund transfer service through RTGS facility from Bank Indonesia that is subject to a transfer fee, but with an option whether the charge will be borne by the sender or the recipient.



### Pembayaran Tagihan Payment of Bills

Layanan pembayaran tagihan, misalnya tagihan rekening listrik PLN, rekening telepon Telkom, dan internet Speedy.

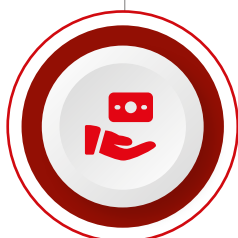
A service for paying bills, e.g. electricity bills from PLN, phone bills from Telkom, and internet bills from Speedy.



### Kartu ATM ATM Card

Fasilitas yang Bank Victoria berikan kepada nasabahnya berupa Kartu Victoria dengan menggunakan format *National Standard Indonesian Chip Card Specification* (NSICCS) yang memiliki fitur keamanan yang sangat tinggi, sehingga dapat meminimalkan risiko *fraud*, seperti yang terjadi pada kartu ATM dengan format *magnetic stripe*. Kartu ATM Victoria ini dapat digunakan oleh nasabah di lebih dari 120.000 ATM yang *merchant*-nya tergabung dengan ATM Prima, sehingga dapat memberikan kemudahan untuk bertransaksi, seperti penarikan tunai, cek saldo, transfer antar rekening di Bank Victoria maupun di bank lain yang merupakan anggota jaringan ATM Prima yang tersebar di seluruh Indonesia.

A facility provided by Bank Victoria to its customers in the form of Victoria Card using the format of National Standard Indonesian Chip Card Specification (NSICCS), which has a very high security feature that can minimize the risk of fraud, as happened in ATM cards with a magnetic stripe format. This Victoria ATM card can be used by customers in more than 120,000 ATMs whose merchants are affiliated with ATM Prima to facilitate transactions, such as cash withdrawals, balance checks, inter-accounts transfer in Bank Victoria and other banks that are members of ATM Prima network scattered throughout Indonesia.



### Auto Save

Layanan fasilitas yang diperuntukan kepada nasabah giro perorangan Bank Victoria yang dapat mengoptimalkan pengendapan dana.

A facility service reserved for individual current accounts customers of Bank Victoria that can optimize the deposit of funds.



### Auto Debet

Layanan fasilitas auto debet yang diperuntukan kepada nasabah dalam melakukan transaksi yang dilakukan secara periodik, seperti untuk pembayaran tagihan listrik (PLN), telepon, Perusahaan Air Minum (PAM), dan lain-lain.

An auto debit facility reserved for customers in making transactions periodically, such as bill payments of electricity (PLN), telephones, water supplies (PAM), etc.



### Internet Banking dan Mobile Banking Victoria Victoria Internet Banking and Mobile Banking

Fasilitas *electronic banking* yang diperuntukan kepada nasabah tabungan perorangan yang memudahkan dalam melakukan transaksi perbankan via *smartphone* maupun komputer. Dengan menggunakan fasilitas ini, nasabah juga dapat melakukan transaksi perbankan tanpa harus datang ke kantor cabang Bank Victoria. Berbagai transaksi dapat dilakukan, antara lain pemindahbukuan, melihat mutasi dan riwayat transaksi, transfer *online* menggunakan jaringan Prima, transfer ke bank lain dengan menggunakan SKN, transaksi melalui pembelian listrik dan pulsa, serta transaksi pembayaran rutin bulanan, seperti kartu kredit, tagihan listrik, internet, TV kabel, asuransi, dan lain-lain.

Electronic banking facilities reserved for individual savings customers provide convenience in making banking transactions via smartphone or computer. By using this facility, customers can also make banking transactions without having to come to Bank Victoria's branch offices. Various transactions can be made, among others, balance transfer, checking transfer and historical transactions, online transfer using Prima network, transfer to other banks using SKN, transactions of electricity and telephone credit purchase, and monthly regular payment transactions, such as credit cards, bills of electricity, internet, cable TV, insurance, etc.

## Wilayah Operasional Operational Areas



### Jaringan Kantor Office Network

Kantor	2021	2020	2019	2018	2017	Office
Kantor Pusat	1	1	1	1	1	Head Office
Kantor Cabang	14	14	14	12	9	Branch Office
Kantor Cabang Pembantu	25	38	63	65	68	Sub-branch Offices
Jaringan Kantor Lain (Kantor Kas, <i>Payment Point</i> , dan lainnya)	-	1	8	14	27	Other Office Network (Cash Office, <i>Payment Point</i> , and others)
<b>Total</b>	<b>40</b>	<b>54</b>	<b>86</b>	<b>92</b>	<b>105</b>	<b>Total</b>



Sampai dengan tahun 2021, Bank Victoria memiliki 1 (satu) kantor pusat dan 39 jaringan kantor yang terdiri dari kantor cabang, kantor cabang pembantu, dan jaringan kantor lainnya, seperti kantor kas, *payment point*, dan kantor layanan kas.

Until 2021, Bank Victoria had 1 (one) head office and 39 office network consisting of branch offices, sub-branch offices, and other office network, such as cash offices, payment points, and cash service offices.

1

**Kantor Pusat**  
Head Office

14

**Kantor Cabang**  
Branch Offices

25

**Kantor Cabang Pembantu**  
Sub-Branch Offices

**Jaringan Kantor per Wilayah Tahun 2021**  
Office Network by Region in 2021

Wilayah	Kantor Cabang Branch Office	Kantor Cabang Pembantu Sub-Branch Offices	Total	Area
Jakarta Timur	-	-	-	East Jakarta
Jakarta Selatan	3	5	8	South Jakarta
Jakarta Utara	1	4	5	North Jakarta
Jakarta Barat	-	9	9	West Jakarta
Jakarta	1	5	6	Jakarta
Bekasi dan sekitarnya	-	-	-	Bekasi and the surrounding
Tangerang dan sekitarnya	-	2	2	Tangerang and the surrounding
Cabang Luar Kota	9	-	9	Out-of-Town Branch
<b>Total</b>	<b>14</b>	<b>25</b>	<b>39</b>	<b>Total</b>

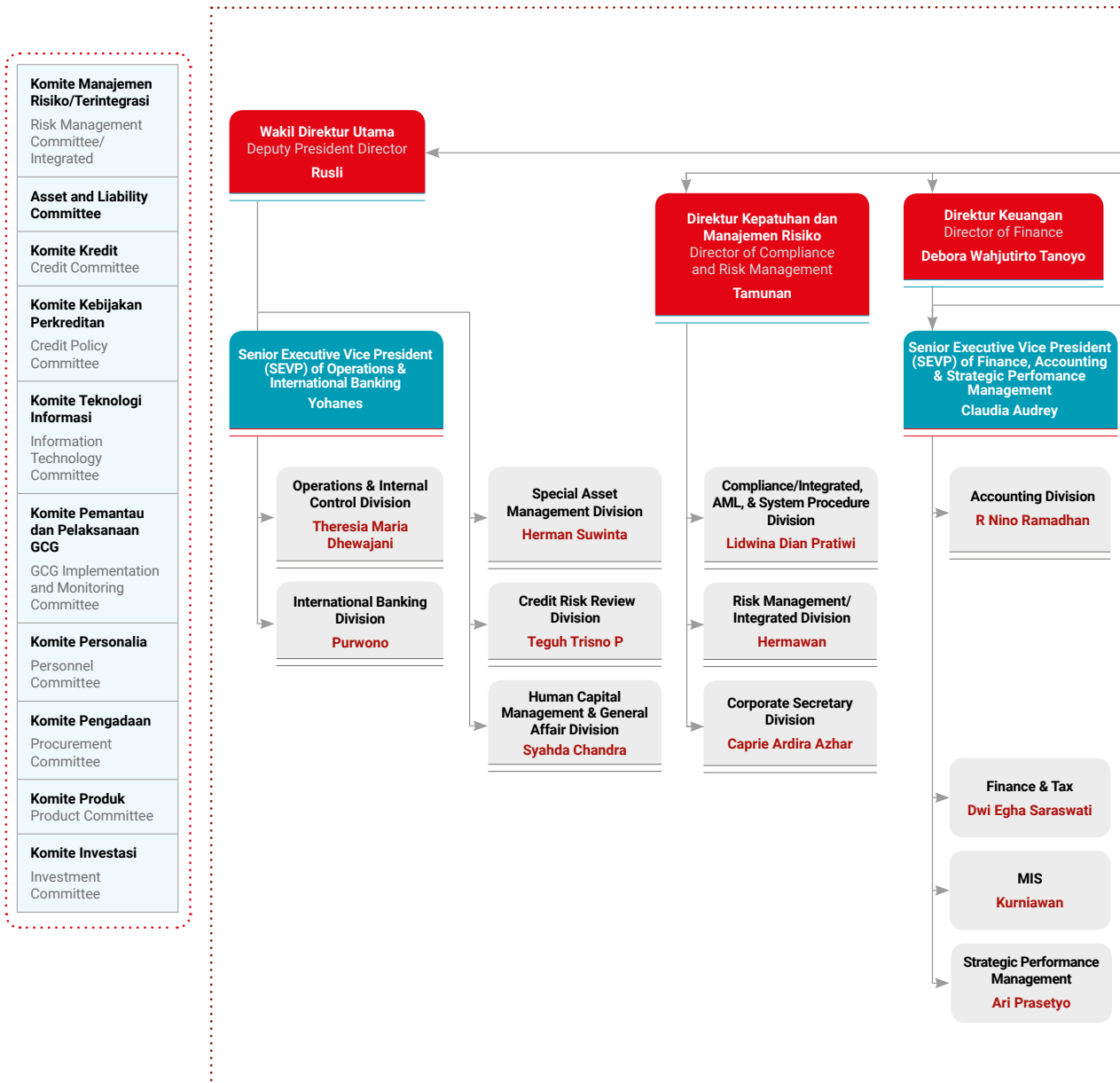


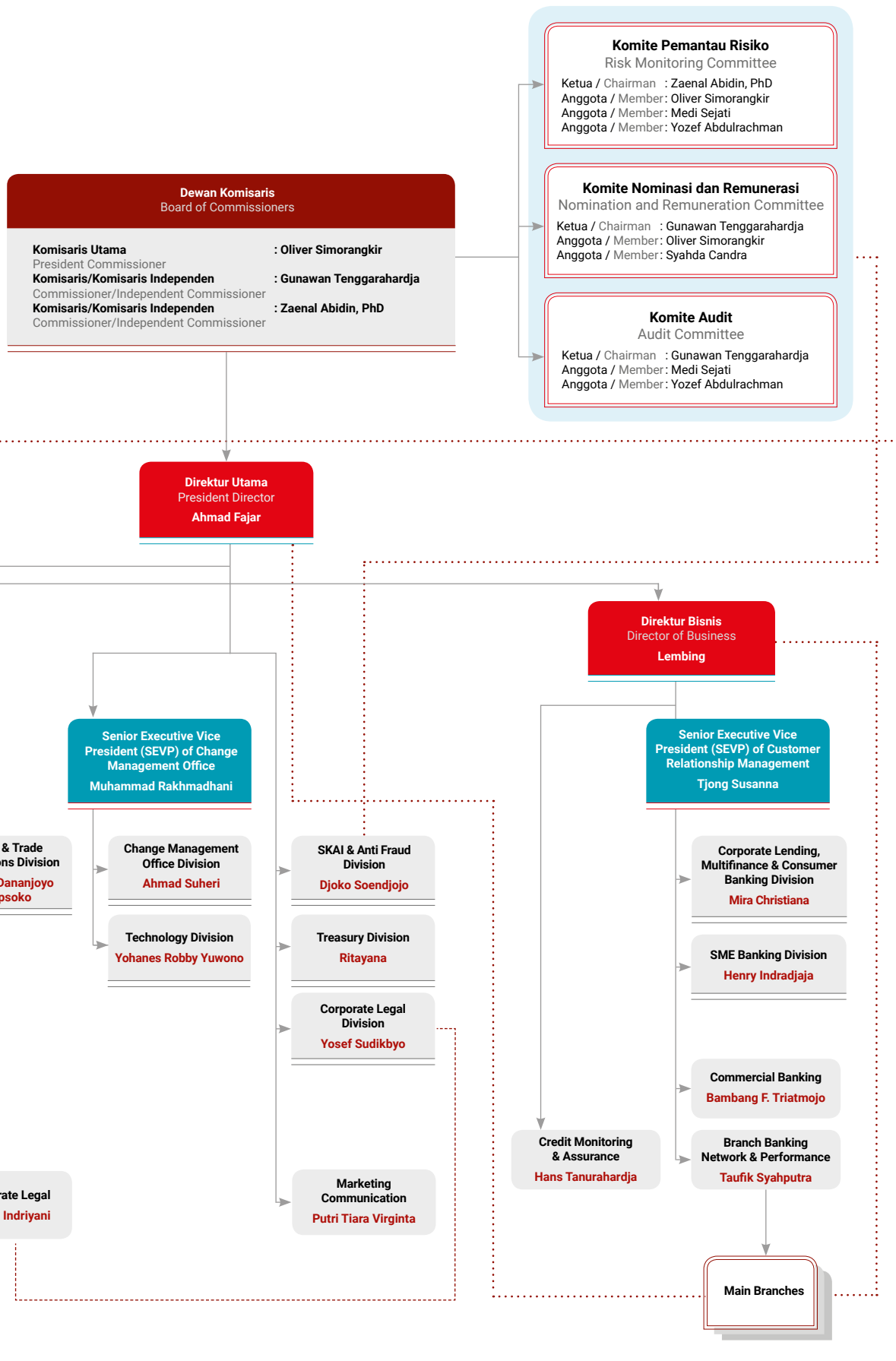
# Struktur Organisasi

## Organization Structure

Struktur Organisasi Bank Victoria berdasarkan Surat Keputusan Direksi No. 023/SK-DIR/11/21 tanggal 25 November 2021 tentang Perubahan Struktur Organisasi PT Bank Victoria International Tbk ditunjukkan sebagai berikut.

The Organizational Structure of Bank Victoria, based on the Board of Directors' Decision Letter No. 023/SK-DIR/11/21 dated 25 November 2021 on the Change in the Organizational Structure of PT Bank Victoria International Tbk, is shown as follows.





# Profil Dewan Komisaris

## Board of Commissioners Profile



### Oliver Simorangkir

Komisaris Utama  
President Commissioner



**Kewarganegaraan**  
**Nationality**  
Indonesia / Indonesian



**Usia**  
**Age**  
71 tahun / years old



**Domisili**  
**Domicile**  
Jakarta



**Tempat Lahir**  
**Place of Birth**  
Tarutung

#### Dasar Pengangkatan dan Periode Menjabat

- Surat Keputusan RUPS Tahunan tanggal 26 Juni 2015 (2015-2016);
- Surat Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019); dan
- Surat Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022).

#### Riwayat Pendidikan

Sarjana Ekonomi Akuntansi dari Universitas Indonesia (1980).

#### Rangkap Jabatan Saat Ini

- Anggota Komite Pemantau Risiko Bank Victoria (sejak 2015); dan
- Anggota Komite Nominasi dan Remunerasi Bank Victoria (sejak 2016).

#### Riwayat Jabatan Sebelumnya

- Menjabat di PT Bank Niaga Tbk sebagai:
  - Officer Development Program (1980-1981);
  - Sub Manager Staff Internal Auditor (1981-1983);
  - Assistant Manager – Department Head of Credit Administration Cabang Utama Jakarta (1983-1985);
  - Kepala Divisi Operasional Cabang Utama Jakarta (1985-1987);
  - Senior Manager – Wakil Pimpinan Cabang Thamrin (1987-1988);
  - Assistant Vice President – Manager in Charge Sentralisasi Operasional Wilayah Jakarta (1988-1989);
  - Vice President Operasional – Manager in Charge Wilayah Jakarta (1990-1994);
  - Group Head Operation System and Procedure Head Office (1994-1998);
  - Group Head Corporate Planning and Accounting Control Head Office (1998-2000); dan
  - Senior Vice President – Internal Audit Head (2000-2001).
- Senior Vice President – General Manager Internal Audit PT Bank Permata Tbk (2001-2005);
- Direktur Kepatuhan dan Manajemen Risiko Bank Victoria (2005-2008);
- Direktur Operasi dan Sistem Bank Victoria (2008-2015); dan
- Anggota Komite Tata Kelola Terintegrasi Bank Victoria (2017-2021).

#### Sertifikasi

Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2021-2023).

#### Keterangan

Telah lulus *fit and proper test* Otoritas Jasa Keuangan pada 15 September 2015.

#### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris lainnya, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

#### Basis of Appointment and Term of Office

- Annual GMS Resolutions dated 26 June 2015 (2015-2016);
- Annual GMS Resolutions dated 24 June 2016 (2016-2019); and
- Annual GMS Resolutions dated 10 May 2019 (2019-2022).

#### Education

Bachelor of Economics, Accounting, from Universitas Indonesia (1980).

#### Current Concurrent Positions

- Member of Risk Monitoring Committee of Bank Victoria (since 2015); and
- Member of Nomination and Remuneration Committee of Bank Victoria (since 2016).

#### History of Previous Positions

- Held positions at PT Bank Niaga Tbk as:
  - Officer Development Program (1980-1981);
  - Sub Manager of Internal Auditor Staff (1981-1983);
  - Assistant Manager – Department Head of Credit Administration of Jakarta Main Branch (1983-1985);
  - Head of Operational Division of Jakarta Main Branch (1985-1987);
  - Senior Manager – Vice Branch Manager of Thamrin Branch (1987-1988);
  - Assistant Vice President – Manager in Charge of Operational Centralization of Jakarta Region (1988-1989);
  - Vice President of Operations – Manager in Charge of Jakarta Region (1990-1994);
  - Group Head of Operation System and Procedure at Head Office (1994-1998);
  - Group Head of Corporate Planning and Accounting Control at Head Office (1998-2000); and
  - Senior Vice President - Internal Audit Head (2000-2001).
- Senior Vice President – General Manager of Internal Audit of PT Bank Permata Tbk (2001-2005);
- Director of Compliance and Risk Management of Bank Victoria (2005-2008);
- Director of Operations and Systems of Bank Victoria (2008-2015); and
- Member of Integrated Governance Committee of Bank Victoria (2017-2021).

#### Certification

Risk Management Certification Level 5 from the Banking Professional Certification Institute (2021-2023).

#### Description

Passed the fit and proper test from the Financial Services Authority on 15 September 2015.

#### Affiliation Relationship

Does not have any affiliation with other members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.



## Gunawan Tenggarhardja

Komisaris/Komisaris Independen  
Commissioner/Independent Commissioner



**Kewarganegaraan**  
Nationality  
Indonesia / Indonesian



**Usia**  
Age  
66 tahun / years old



**Domisili**  
Domicile  
Jakarta



**Tempat Lahir**  
Place of Birth  
Malang

### Dasar Pengangkatan dan Periode Menjabat

- Surat Keputusan RUPS Luar Biasa tanggal 24 Februari 2003 (2003-2007);
- Surat Keputusan RUPS Luar Biasa tanggal 19 Desember 2007 (2007-2010);
- Surat Keputusan RUPS Tahunan tanggal 25 Juni 2010 (2010-2013);
- Surat Keputusan RUPS Tahunan tanggal 28 Juni 2013 (2013-2016);
- Surat Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019); dan
- Surat Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022).

### Riwayat Pendidikan

Sarjana Teknik Sipil dari Institut Teknologi Bandung (1981).

### Rangkap Jabatan Saat Ini

- Komisaris Independen PT Jakarta Setiabudi Internasional Tbk (sejak 2004);
- Ketua Komite Nominasi dan Remunerasi Bank Victoria (sejak 2012); dan
- Ketua Komite Audit Bank Victoria (sejak 2015).

### Riwayat Jabatan Sebelumnya

- International Field Engineer 1 Schlumberger OSA (1982-1984);
- Assistant Manager PT Bank Bali (1985-1988);
- General Manager PT Sampoerna Transport Nusantara (1989-1992);
- Direktur Eksekutif PT Duta Pertiwi Tbk (1992-1996);
- Direktur PT Bhuanatala Indah Permai Tbk (1996-1998);
- Komisaris Utama PT Sigma Karya Sempurna (Bali Camp) (1998-2004); dan
- Anggota Komite Tata Kelola Terintegrasi Bank Victoria (2017-2021).

### Sertifikasi

Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2021-2025).

### Keterangan

- Sebagai Komisaris:  
Telah lulus *fit and proper test* Bank Indonesia pada tanggal 22 April 2003; dan
- Sebagai Komisaris Independen:  
Telah lulus *fit and proper test* Bank Indonesia pada tanggal 13 September 2003.

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris lainnya, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Basis of Appointment and Term of Office

- Extraordinary GMS Resolutions dated 24 February 2003 (2003-2007);
- Extraordinary GMS Resolutions dated 19 December 2007 (2007-2010);
- Annual GMS Resolutions dated 25 June 2010 (2010-2013);
- Annual GMS Resolutions dated 28 June 2013 (2013-2016);
- Annual GMS Resolutions dated 24 June 2016 (2016-2019); and
- Annual GMS Resolutions dated 10 May 2019 (2019-2022).

### Education

Bachelor of Civil Engineering from Bandung Institute of Technology (1981).

### Current Concurrent Positions

- Independent Commissioner of PT Jakarta Setiabudi Internasional Tbk (since 2004);
- Chairman of Nomination and Remuneration Committee of Bank Victoria (since 2012); and
- Chairman of Audit Committee of Bank Victoria (since 2015).

### History of Previous Positions

- International Field Engineer 1 of Schlumberger OSA (1982-1984);
- Assistant Manager of PT Bank Bali (1985-1988);
- General Manager of PT Sampoerna Transport Nusantara (1989-1992);
- Executive Director of PT Duta Pertiwi Tbk (1992-1996);
- Director of PT Bhuanatala Indah Permai Tbk (1996-1998);
- President Commissioner of PT Sigma Karya Sempurna (Bali Camp) (1998-2004); and
- Member of Integrated Governance Committee of Bank Victoria (2017-2021).

### Certification

Risk Management Certification Level 5 from the Banking Professional Certification Institute (2021-2025).

### Description

- As Commissioner:  
Passed the fit and proper test from Bank Indonesia on 22 April 2003; and
- As Independent Commissioner:  
Passed the fit and proper test from Bank Indonesia on 13 September 2003.

### Affiliation Relationship

Does not have any affiliation with other members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.



## Zaenal Abidin, PhD

Komisaris/Komisaris Independen  
Commissioner/Independent Commissioner



**Kewarganegaraan**  
**Nationality**  
Indonesia / Indonesian



**Usia**  
**Age**  
58 tahun / years old



**Domisili**  
**Domicile**  
Depok



**Tempat Lahir**  
**Place of Birth**  
Sukabumi

### Dasar Pengangkatan dan Periode Menjabat

- Surat Keputusan RUPS Tahunan tanggal 29 Juni 2012 (2012-2013);
- Surat Keputusan RUPS Tahunan tanggal 28 Juni 2013 (2013-2016);
- Surat Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019); dan
- Surat Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022).

### Riwayat Pendidikan

- Sarjana Ekonomi dari Universitas Islam Indonesia, Yogyakarta (1987);
- Master Manajemen dari ASIAN Institute of Management (AIM), Filipina (1997); dan
- Doctor of Philosophy dari Santo Tomas University, Filipina (2006).

### Rangkap Jabatan Saat Ini

- Dosen Perbanas Institute (sejak 1993);
- Ketua Komite Pemantau Risiko Bank Victoria (sejak 2013);
- Asesor Manajemen Risiko Pasar Modal (sejak 2016); dan
- Komisaris Independen PT Sumberdaya Sewatama (sejak 2021).

### Riwayat Jabatan Sebelumnya

- Pro Manager Treasury* dan Analisa Bidang Dana Perbankan Bank Summa (1989-1992);
- Peneliti Senior GCG Indonesia Institute Corporate Governance (2008-2018);
- Koordinator Staf Khusus Bidang Riset Asosiasi Perbanas (2011-2012);
- Dosen Sekolah Tinggi Ilmu Ekonomi Indonesia Banking School (2013-2019); dan
- Ketua Komite Tata Kelola Terintegrasi Grup Victoria (2015-2021).

### Sertifikasi

- Sertifikasi bidang Kepatuhan Perbankan Level Eksekutif dari Lembaga Sertifikasi Profesi Perbankan (2017-2022);
- Sertifikasi bidang Keahlian Profesi Pasar Modal sebagai Wakil Manajer Investasi dari The Indonesia Capital Market Institute (2018-2023);
- Sertifikasi bidang Manajemen Risiko Level Utama dari Lembaga Sertifikasi Profesi Pasar Modal (2019-2023);
- Sertifikasi bidang Asesor Kompetensi Level Asesmen/Uji Kompetensi dari Lembaga Sertifikasi Profesi Perbankan (2019-2022); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Level 2 dari Lembaga Sertifikasi Profesi Perbankan (2021-2025).

### Keterangan

Telah lulus *fit and proper test* Bank Indonesia pada tanggal 27 September 2012.

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris lainnya, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Basis of Appointment and Term of Office

- Annual GMS Resolutions dated 29 June 2012 (2012-2013);
- Annual GMS Resolutions dated 28 June 2013 (2013-2016);
- Annual GMS Resolutions dated 24 June 2016 (2016-2019); and
- Annual GMS Resolutions dated 10 May 2019 (2019-2022).

### Education

- Bachelor of Economics from Universitas Islam Indonesia, Yogyakarta (1987);
- Master of Management from ASIAN Institute of Management (AIM), the Philippines (1997); and
- Doctor of Philosophy* from Santo Tomas University, the Philippines (2006).

### Current Concurrent Positions

- Lecturer of Perbanas Institute (since 1993);
- Chairman of Risk Monitoring Committee of Bank Victoria (since 2013);
- Assessor of Risk Management of Capital Market (since 2016); and
- Independent Commissioner of PT Sumberdaya Sewatama (since 2021).

### History of Previous Positions

- Pro Manager Treasury* and Analysis in Banking Fund Sector of Bank Summa (1989-1992);
- GCG Senior Researcher of Indonesia Institute of Corporate Governance (2008-2018);
- Coordinator of Special Staff of Research Field of Perbanas Association (2011-2012);
- Lecturer of Sekolah Tinggi Ilmu Ekonomi Indonesia Banking School (2013-2019); and
- Chairman of Integrated Governance Committee of Victoria Group (2015-2021).

### Certification

- Certification in Banking Compliance Executive Level from the Banking Profession Certification Institute (2017-2022);
- Certification in Capital Market Professional Expertise as Deputy Investment Manager from The Indonesia Capital Market Institute (2018-2023);
- Certification in Risk Management Main Level from the Banking Profession Certification Institute (2019-2023);
- Certification in Competency Assessment, Assessment Level/Competency Test from the Banking Profession Certification Institute (2019-2022); and
- Certification in Banking Risk Management Level 2 from the Banking Profession Certification Institute (2021-2025).

### Description

Passed the fit and proper test from Bank Indonesia on 27 September 2012.

### Affiliation Relationship

Does not have any affiliation with other members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

## Profil Direksi

### Board of Directors' Profile



### Ahmad Fajar

Direktur Utama  
President Director



**Kewarganegaraan**  
Nationality  
Indonesia / Indonesian



**Usia**  
Age  
55 tahun / years old



**Domisili**  
Domicile  
Jakarta



**Tempat Lahir**  
Place of Birth  
Solo

#### Dasar Pengangkatan dan Periode Menjabat

- Surat Keputusan RUPS Tahunan tanggal 18 Mei 2018 (2018-2019); dan
- Surat Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022).

#### Riwayat Pendidikan

- Sarjana Ekonomi Pertanian dari Institut Pertanian Bogor (1988); dan
- Magister Keuangan dari Universitas Padjajaran (2000).

#### Rangkap Jabatan Saat Ini

Tidak Ada.

#### Riwayat Jabatan Sebelumnya

- Dealer Bank Bumi Daya (1990-1995);
- Vice President - Head of Fixed Income dan Capital Market, Treasury Group PT Bank Mandiri (Persero) (2000-2002);
- Direktur Treasury dan International Banking PT Bank Mutiara Tbk (2008-2013).
- Direktur Utama PT Bank Mutiara Tbk (2014-2015);
- Direktur Utama PT Bank J Trust Indonesia Tbk (2015-2016); dan
- Komisaris PT Bank J Trust Indonesia Tbk (2016-2018).

#### Sertifikasi

- Sertifikasi bidang *Treasury Dealer Level Advance* dari Lembaga Sertifikasi Profesi Perbankan (2019-2022); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2021-2023).

#### Keterangan

Telah lulus *fit and proper test* Otoritas Jasa Keuangan pada 30 Oktober 2018.

#### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Direksi lainnya, anggota Dewan Komisaris, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

#### Basis of Appointment and Term of Office

- Annual GMS Resolutions dated 18 May 2018 (2018-2019); and
- Annual GMS Resolutions dated 10 May 2019 (2019-2022).

#### Education

- Bachelor of Economics in Agriculture from Bogor Agricultural Institute (1988); and
- Master of Finance from Padjajaran University (2000).

#### Current Concurrent Positions

None.

#### History of Previous Positions

- Dealer of Bank Bumi Daya (1990-1995);
- Vice President - Head of Fixed Income and Capital Market, Treasury Group of PT Bank Mandiri (Persero) (2000-2002);
- Director of Treasury and International Banking of PT Bank Mutiara Tbk (2008-2013);
- President Director of PT Bank Mutiara Tbk (2014-2015);
- President Director of PT Bank J Trust Indonesia Tbk (2015-2016); and
- Commissioner of PT Bank J Trust Indonesia Tbk (2016-2018).

#### Certification

- Certification in Treasury Dealer Advanced Level from the Banking Profession Certification Institute (2019-2022); and
- Certification in Banking Risk Management Level 5 from the Banking Profession Certification Institute (2021-2023).

#### Description

Passed the *fit and proper test* from the Financial Services Authority on 30 October 2018.

#### Affiliation Relationship

Does not have any affiliation with other members of Board of Directors, members of Board of Commissioners, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.





## Rusli

Wakil Direktur Utama  
Deputy President Director



**Kewarganegaraan**  
Nationality  
Indonesia / Indonesian



**Usia**  
Age  
50 tahun / years old



**Domisili**  
Domicile  
Jakarta



**Tempat Lahir**  
Place of Birth  
Tebing Tinggi

### Dasar Pengangkatan dan Periode Menjabat

- Surat Keputusan RUPS Luar Biasa tanggal 29 Februari 2016 (2016);
- Surat Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019); dan
- Surat Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022).

### Riwayat Pendidikan

Insinyur jurusan Teknik Industri dari Universitas Trisakti (1993).

### Rangkap Jabatan Saat Ini

Tidak Ada.

### Riwayat Jabatan Sebelumnya

- Menjabat di PT Bank QNB Indonesia Tbk sebagai:
  - Head of Treasury (2000-2002);
  - Direktur Treasury (2002-2009);
  - Direktur Bisnis (2009-2012);
  - Direktur Operasional (2012-2016); dan
- Direktur Operasi dan Sistem Bank Victoria (2016).

### Sertifikasi

- Sertifikasi bidang *Treasury Dealer Level Advance* dari Lembaga Sertifikasi Profesi Perbankan (2021-2024); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2021-2023).

### Keterangan

Telah lulus *fit and proper test* Otoritas Jasa Keuangan pada 16 Mei 2016.

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Direksi lainnya, anggota Dewan Komisaris, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Basis of Appointment and Term of Office

- Extraordinary GMS Resolutions dated 29 February 2016 (2016);
- Annual GMS Resolutions dated 24 June 2016 (2016-2019); and
- Annual GMS Resolutions dated 10 May 2019 (2019-2022).

### Education

Engineer of Industrial Engineering from Trisakti University (1993).

### Current Concurrent Positions

None.

### History of Previous Positions

- Held positions at PT Bank QNB Indonesia Tbk as:
  - Head of Treasury (2000-2002);
  - Director of Treasury (2002-2009);
  - Director of Business (2009-2012);
  - Director of Operations (2012-2016); and
- Director of Operations and Systems of Bank Victoria (2016).

### Certification

- Certification in Treasury Dealer Advanced Level from the Banking Profession Certification Institute (2021-2024); and
- Certification in Banking Risk Management Level 5 from the Banking Profession Certification Institute (2021-2023).

### Description

Passed the fit and proper test from the Financial Services Authority on 16 May 2016.

### Affiliation Relationship

Does not have any affiliation with other members of Board of Directors, members of Board of Commissioners, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.



## Lembing

Direktur Bisnis  
Director of Business



**Kewarganegaraan**  
Nationality  
Indonesia / Indonesian



**Usia**  
Age  
57 tahun / years old



**Domisili**  
Domicile  
Jakarta



**Tempat Lahir**  
Place of Birth  
Pekanbaru

### Dasar Pengangkatan dan Periode Menjabat

- Surat Keputusan RUPS Tahunan tanggal 18 Mei 2018 (2018-2019); dan
- Surat Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022).

### Riwayat Pendidikan

Sarjana Ekonomi dari Universitas Tarumanegara (1989).

### Rangkap Jabatan Saat Ini

Tidak Ada.

### Riwayat Jabatan Sebelumnya

- Branch Manager Bank Lippo (1991-2004);
- Kepala Wilayah Jakarta dan Kalimantan Bank Lippo (2004-2008);
- Small Medium Enterprise Head Bank Danamon (2008-2009);
- Small Medium Enterprise Head and Emerging Business Maybank (2009-2012);
- Direktur PT Elang Kurnia Sakti (2012-2017);
- Direktur PT Agung Kimia Cemerlang (2012-2017);
- Komisaris PT Agung Kimia Cemerlang (2015-2017); dan
- Small Medium Enterprise Head Maybank (2017-2018).

### Sertifikasi

Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022).

### Keterangan

Telah lulus *fit and proper test* Otoritas Jasa Keuangan pada 30 Oktober 2018.

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Direksi lainnya, anggota Dewan Komisaris, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Basis of Appointment and Term of Office

- GMS Resolutions dated 18 May 2018 (2018-2019); and
- GMS Resolutions dated 10 May 2019 (2019-2022).

### Education

Bachelor of Economic from Tarumanegara University (1989).

### Current Concurrent Positions

None.

### History of Previous Positions

- Branch Manager of Bank Lippo (1991-2004);
- Head of Jakarta and Kalimantan Regions of Bank Lippo (2004-2008);
- Small and Medium Enterprise Head of Bank Danamon (2008-2009);
- Small and Medium Enterprise Head and Emerging Business of Maybank (2009-2012);
- Director of PT Elang Kurnia Sakti (2012-2017);
- Director of PT Agung Kimia Cemerlang (2012-2017);
- Commissioner of PT Agung Kimia Cemerlang (2015-2017); and
- Small and Medium Enterprise Head of Maybank (2017-2018).

### Certification

Risk Management Certification Level 5 for Banking from the Banking Professional Certification Institute (2020-2022).

### Description

Passed the fit and proper test from the Financial Services Authority on 30 October 2018.

### Affiliation Relationship

Does not have any affiliation with other members of Board of Directors, members of Board of Commissioners, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.



## Debora Wahjutirto Tanoyo

Direktur Keuangan  
Director of Finance



**Kewarganegaraan**  
Nationality  
Indonesia / Indonesian



**Usia**  
Age  
36 tahun / years old



**Domisili**  
Domicile  
Jakarta



**Tempat Lahir**  
Place of Birth  
Surabaya

### Dasar Pengangkatan dan Periode Menjabat

- Surat Keputusan RUPS Tahunan tanggal 18 Mei 2018 (2018-2019); dan
- Surat Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022).

### Riwayat Pendidikan

- Bachelor of Science* dari University of San Francisco, California (2006); dan
- Master of Business Administration* dari University of San Francisco, California (2009).

### Rangkap Jabatan Saat Ini

Tidak Ada.

### Riwayat Jabatan Sebelumnya

- Assurance Staff* Burr Pilger and Mayer LLP, San Francisco (2007-2008);
- Senior Associate 2* Ernst and Young LLP, Singapore (2011-2013);
- Finance Manager* PT Victoria Investama Tbk (2013-2014);
- Senior Staf* Manajemen Risiko Bank Victoria (2014-2015);
- Direktur PT Victoria Investama Tbk (2014-2018); dan
- Komisaris Bank Victoria (2016-2018).

### Sertifikasi

Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022).

### Keterangan

Telah lulus *fit and proper test* Otoritas Jasa Keuangan pada 22 November 2018.

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan Dewan Komisaris dan Direksi. Namun, memiliki hubungan afiliasi dengan Pemegang Saham Pengendali.

### Basis of Appointment and Term of Office

- Annual GMS Resolutions dated 18 May 2018 (2018-2019); and
- Annual GMS Resolutions dated 10 May 2019 (2019-2022).

### Education

- Bachelor of Science from University of San Francisco, California (2006); and
- Master of Business Administration from University of San Francisco, California (2009).

### Current Concurrent Positions

None.

### History of Previous Positions

- Assurance Staff of Burr Pilger and Mayer LLP, San Francisco (2007-2008);
- Senior Associate 2 of Ernst and Young LLP, Singapore (2011-2013);
- Finance Manager of PT Victoria Investama Tbk (2013-2014);
- Senior Staff of Risk Management of Bank Victoria (2014-2015);
- Director of PT Victoria Investama Tbk (2014-2018); and
- Commissioner of Bank Victoria (2016-2018).

### Certification

Risk Management Certification Level 5 for Banking from the Banking Professional Certification Institute (2020-2022).

### Description

Passed the fit and proper test from the Financial Services Authority on 22 November 2018.

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners and members of Board of Directors. However, has affiliation with Controlling Shareholder.



## Tamunan

Direktur Kepatuhan dan Manajemen Risiko  
Director of Compliance and Risk Management



**Kewarganegaraan**  
Nationality  
Indonesia / Indonesian



**Usia**  
Age  
56 tahun / years old



**Domisili**  
Domicile  
Jakarta



**Tempat Lahir**  
Place of Birth  
Banjarmasin

### Dasar Pengangkatan dan Periode Menjabat

- Surat Keputusan RUPS Tahunan tanggal 27 Juni 2008 (2008-2010);
- Surat Keputusan RUPS Tahunan tanggal 25 Juni 2010 (2010-2013);
- Surat Keputusan RUPS Tahunan tanggal 28 Juni 2013 (2013-2016);
- Surat Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019); dan
- Surat Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022).

### Riwayat Pendidikan

- Sarjana Ekonomi bidang Akuntansi dari Universitas Lambung Mangkurat, Banjarmasin (1990); dan
- Magister Manajemen bidang Manajemen Risiko dari Universitas Indonesia (2008).

### Rangkap Jabatan Saat Ini

Tidak Ada.

### Riwayat Jabatan Sebelumnya

- Staf Audit Kantor Akuntan Publik Drs. Santoso (1987-1988);
- Kepala Bagian Administrasi dan Umum PT Winduintan Deltatama (Muda Jaya Group) Banjarmasin (1988-1990);
- Kepala Kantor Bank Andromeda (1990-1997);
- Kepala Kantor Bank Alfa, Menara Kebon Sirih (1997-1999);
- Staf Badan Penyelesaian Perbankan Nasional (BPPN) (1999);
- Manajer Operasional PT Victoria Sekuritas (1999-2001);
- Head of Operation and Compliance PT Mahastra Capital (2001-2003); dan
- Direktur Operasi Bank Victoria (2007-2008).

### Sertifikasi

- Sertifikasi bidang *Treasury Dealer Level Advance* dari Lembaga Sertifikasi Profesi Perbankan (2021-2024);
- Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2021-2023); dan
- Sertifikasi bidang Compliance Level Advance dari Lembaga Sertifikasi Profesi Perbankan (2021-2023).

### Keterangan

Telah lulus *fit and proper test* Bank Indonesia pada 24 Maret 2009.

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Direksi lainnya, anggota Dewan Komisaris, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Basis of Appointment and Term of Office

- Annual GMS Resolutions dated 27 June 2008 (2018-2010);
- Annual GMS Resolutions dated 25 June 2010 (2010-2013);
- Annual GMS Resolutions dated 28 June 2013 (2013-2016);
- Annual GMS Resolution dated 24 June 2016 (2016-2019); and
- Annual GMS Resolutions dated 10 May 2019 (2019-2022).

### Education

- Bachelor of Economics in Accounting from Lambung Mangkurat University, Banjarmasin (1990); and
- Master of Management, majoring in Risk Management, from Universitas Indonesia (2008).

### Current Concurrent Positions

None.

### History of Previous Positions

- Audit Staff of Public Accounting Firm of Drs. Santoso (1987-1988);
- Head of Administration and General Affairs Department of PT Winduintan Deltatama (Muda Jaya Group), Banjarmasin (1988-1990);
- Office Head of Bank Andromeda (1990-1997);
- Office Head of Bank Alfa, Menara Kebon Sirih (1997-1999);
- Staff of Indonesian Bank Restructuring Agency (BPPN) (1999);
- Manager of Operations of PT Victoria Securities (1999-2001);
- Head of Operations and Compliance of PT Mahastra Capital (2001-2003); and
- Director of Operations of Bank Victoria (2007-2008).

### Certification

- Certification in Treasury Dealer Advanced Level from the Banking Profession Certification Institute (2021-2024);
- Certification in Banking Risk Management Level 5 from the Banking Profession Certification Institute (2021-2023); and
- Certification in Compliance Advanced Level from the Banking Profession Certification Institute (2021-2023).

### Description

Passed the fit and proper test from Bank Indonesia on 24 March 2009.

### Affiliation Relationship

Does not have any affiliation with other members of Board of Directors, members of Board of Commissioners, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

## Perubahan Komposisi Anggota Dewan Komisaris dan Direksi

Sepanjang tahun 2021, tidak terjadi perubahan komposisi anggota Dewan Komisaris dan Direksi Bank Victoria.

## Changes to the Composition of Board of Commissioners and Board of Directors

Throughout 2021, there were no changes to the composition of Board of Commissioners and Board of Directors of Bank Victoria.

# Profil Komite Pemantau Risiko

## Risk Monitoring Committee's Profile

<b>Zaenal Abidin, PhD</b>	Ketua Komite Pemantau Risiko Chairman of Risk Monitoring Committee	Profil dapat dilihat pada bagian Profil Dewan Komisaris. The Profile can be found on the Board of Commissioners Profile.
<b>Oliver Simorangkir</b>	Anggota Komite Pemantau Risiko Member of Risk Monitoring Committee	

Ditunjuk menjadi Ketua dan Anggota berdasarkan Surat Keputusan Direksi No. 006/SK-DIR/10/21 tanggal 26 Oktober 2021 (2021-Sekarang).  
Appointed as Chairman and Member based on Board of Directors' Decision Letter No. 006/SK-DIR/10/21 dated 26 October 2021 (2021-Now).

<b>Medi Sejati</b> Anggota Komite Pemantau Risiko Member of Risk Monitoring Committee	<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	56 tahun 56 years old
	<b>Domisili</b> Domicile	Jakarta	<b>Tempat Lahir</b> Place of Birth	Jakarta

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 006/SK-DIR/10/21 tanggal 26 Oktober 2021 (2021-Sekarang).

### Riwayat Pendidikan

Diploma Manajemen Perbankan dari Sekolah Tinggi Ilmu Ekonomi AKPI Bandung (1990).

### Rangkap Jabatan Saat Ini

- Anggota Komite Audit Bank Victoria (sejak 2021);
- Anggota Komite Audit Bank Victoria Syariah (sejak 2021);
- Anggota Komite Pemantau Risiko Bank Victoria Syariah (sejak 2021);
- Anggota Komite Audit PT Victoria Alife Indonesia (sejak 2021); dan
- Anggota Komite Pemantau Risiko PT Victoria Alife Indonesia (sejak 2021).

### Riwayat Jabatan Sebelumnya

- Kolektor PT Jasa Marga (1984–1986);
- Teller Bank Swadesi (1990-1991);
- Menjabat di Bank Intan (1991-1999) sebagai :
  - Sekretaris Kepala Biro Kredit;
  - Internal Control Officer;
  - Kepala Bagian Audit Kredit dan Marketing;
  - Kepala Bagian Kredit Support.
- Auditor Kantor Akuntan Publik Edi Kaslim & Kantor Akuntan Publik Gatot Permadi Djuwono (1999–2002);
- Kepala Bagian Akunting Bank Harmoni (2002–2007);
- Kepala Bagian Akunting Bank Index Selindo (2007–2008);
- Kepala Divisi Akunting Bank Swaguna (2008–2010);
- Kepala Divisi Akunting Bank Victoria Syariah (2010-2014);
- Akunting Officer PT Bank Victoria International Tbk (2014);
- Kepala Bagian Sentral Operasional PT Bank Victoria Syariah (2014);
- Kepala Bagian Support Pembiayaan PT Bank Victoria Syariah (2015);
- Kepala Divisi Manajemen Risiko dan Kepatuhan PT Bank Victoria Syariah (2015-2016);
- Kepala Divisi Kepatuhan dan Sekretaris Perusahaan PT Bank Victoria Syariah (2017-2019); dan
- Kepala Divisi Kepatuhan PT Bank Victoria Syariah (2019-2020).

### Sertifikasi

- Sertifikasi Manajemen Risiko Level 1 dari Badan Sertifikasi Manajemen Risiko (2007);
- Sertifikasi Manajemen Risiko Level 2 dari Badan Sertifikasi Manajemen Risiko (2011);
- Sertifikasi Kepatuhan Level 1 dari Lembaga Sertifikasi Profesi Perbankan (2017);
- Sertifikasi Manajemen Risiko Level 3 dari Badan Sertifikasi Manajemen Risiko (2018); dan
- Sertifikasi Kepatuhan Level 2 dari Lembaga Sertifikasi Profesi Perbankan (2018).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 006/SK-DIR/10/21 dated 26 October 2021 (2021-Now).

### Education

Diploma of Banking Management from Sekolah Tinggi Ilmu Ekonomi AKPI Bandung (1990).

### Current Concurrent Positions

- Member of Audit Committee of Bank Victoria (since 2021);
- Member of Audit Committee of Bank Victoria Syariah (since 2021);
- Member of Risk Monitoring Committee of Bank Victoria Syariah (Since 2021);
- Member of Audit Committee of PT Victoria Alife Indonesia (since 2021); and
- Member of Risk Monitoring Committee of PT Victoria Alife Indonesia (since 2021).

### History of Previous Positions

- Collector of PT Jasa Marga (1984–1986);
- Teller of Bank Swadesi (1990-1991);
- Held positions at Bank Intan (1991-1999) as:
  - Secretary of Credit Bureau Head;
  - Internal Control Officer;
  - Credit and Marketing Audit Department Head;
  - Credit Support Department Head;
- Auditor of Edi Kaslim Public Accounting Firm & Gatot Permadi Djuwono Public Accounting Firm (1999–2002);
- Head of Accounting Department of Bank Harmoni (2002–2007);
- Head of Accounting Department of Bank Index Selindo (2007–2008);
- Accounting Division Head of Bank Swaguna (2008-2010);
- Accounting Division Head of PT Bank Victoria Syariah (2010-2014);
- Accounting Officer of PT Bank Victoria International Tbk (2014);
- Central Operational Department Head of PT Bank Victoria Syariah (2014);
- Financing Support Department Head of PT Bank Victoria Syariah (2015);
- Risk Management and Compliance Division Head of PT Bank Victoria Syariah (2015-2016);
- Compliance and Corporate Secretary Division Head of PT Bank Victoria Syariah (2017-2019); and
- Compliance Division Head of PT Bank Victoria Syariah (2019-2020);

### Certification

- Risk Management Certification Level 1 from the Risk Management Certification Institution (2007);
- Risk Management Certification Level 2 from the Risk Management Certification Institution (2011);
- Compliance Certification Level 1 from the Banking Professional Certification Institute (2017);
- Risk Management Certification Level 3 from the Risk Management Certification Agency (2018); and
- Compliance Certification Level 2 from the Banking Professional Certification Institute (2018).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.



## Yozef Abdulrachman

Anggota Komite Pemantau Risiko  
Member of Risk Monitoring Committee

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	64 tahun 64 years old
<b>Domisili</b> Domicile	Tangerang	<b>Tempat Lahir</b> Place of Birth	Tasikmalaya

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 006/SK-DIR/10/21 tanggal 26 Oktober 2021 (2021-Sekarang).

### Riwayat Pendidikan

Sarjana Matematika dari Universitas Padjadjaran (1983).

### Rangkap Jabatan Saat Ini

- Konsultan dan *Trainer* bidang Manajemen Risiko (sejak 2010);
- Trainer* dan Fasilitator Pembekalan Sertifikasi Manajemen Risiko dan *Surveillance/Refreshment* Manajemen Risiko (sejak 2011);
- Konsultan Manajemen Risiko Operasional PT Bank Agro Tbk (2011);
- Konsultan Manajemen Risiko Operasional PT Bank Mutiara Tbk (2013);
- Konsultan *Mapping* dan Pengukuran *Eksposur Corporate Loans Portfolio* PT Perusahaan Gas Negara Tbk (2014); dan
- Konsultan PT Bank Perkreditan Rakyat Sumber Artha Waru Agung, Sidoarjo (2018).

Selain itu, menjabat di Bank Victoria sebagai:

- Anggota Komite Audit (sejak 2019); dan
- Anggota Komite Tata Kelola Terintegrasi (sejak 2019).

### Riwayat Jabatan Sebelumnya

- Menjabat di PT Bank Dagang Negara sebagai:
  - Officer Development Program* (1985-1986);
  - System and Procedure Department Staff - Electronic Data Processing Desk* (1986-1987);
  - Technical Support Department Staff - Electronic Data Processing Desk* (1988-1989);
  - Setup MIDAS Application System*, Los Angeles Agency, Los Angeles, USA (1989);
  - Programmer III - Electronic Data Processing Desk* (1989-1990);
  - Kepala Seksi Pengembangan Sistem Aplikasi – Divisi Informasi Teknologi (1991-1994);
  - Kepala Bagian Operasi Komputer – Divisi Informasi Teknologi (1995-1996); dan
  - Kepala Bagian Dukungan Pengguna – Divisi Informasi Teknologi (1997-1998).
- Menjabat di PT Bank Mandiri Tbk sebagai:
  - Project Manager Y2K* (Legacy PT Bank Dagang Negara) (1999);
  - Group Head, Branch IT Deployment – IT Retail Banking Services Delivery Division* (1999-2000);
  - Integrasi Sistem Aplikasi *Core Banking* (implementasi 600 cabang) (1999-2000);
  - Senior Manager of Operational Risk Management Review – Operational Risk Department – Portfolio and Operational Risk Management Group* (2001-2004);
  - Team Leader of Business Line II – Operational Risk Department – Portfolio and Operational Risk Management Group* (2005-2006);
  - Trainer Implementation and Workshop* Manajemen Risiko Operasional kepada ORM Coordinator Kantor Wilayah, Kantor Pusat, dan Kantor Cabang Timor Leste (2006-2010);
  - Team Leader of Policy – Operational Risk Department – Market and Operational Risk Group* (2007-2008); dan
  - Team Leader of MIS – Operational Risk Department – Market and Operational Risk Group* (2009-2010).

### Sertifikasi

- Manajemen Umum Perbankan dari Lembaga Pengembangan Perbankan Indonesia (1990);
- Kursus Pimpinan Cabang dari Lembaga Pengembangan Perbankan Indonesia (1996);
- BASE-24 dari Applied Communications Inc. (ACI), Nebraska, USA (1996);
- Badan Sertifikasi Manajemen Risiko Level 1 (2005);
- Public Speaking and Business Presentation* dari Tantowi Yahya Public Speaking School (2006);
- Project Management Workshop* ABN Amro (2006);
- Effective Interview Technique* Bagus Brain Communication (2006);
- Badan Sertifikasi Manajemen Risiko Level 2 (2007);
- Training Design Delivery Risk Management Academy* dari PT Bank Mandiri Tbk (2009);
- Training for Trainers Risk Management Certification Level 2* dari Bankers Association for Risk Management (2010);
- Risk Management Certification Refreshment Program* dari Bankers Association for Risk Management (2015); dan
- Risk Management Certification Refreshment Program* dari Lembaga Pengembangan Perbankan Indonesia (2020).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 006/SK-DIR/10/21 dated 26 October 2021 (2021-Now).

### Education

Bachelor of Mathematics from Padjajaran University (1983).

### Current Concurrent Positions

- Consultant and Trainer of Risk Management sector (since 2010);
- Trainer and Facilitator for Briefing of Risk Management Certification and Risk Management Surveillance/Refreshment (since 2011);
- Operational Risk Management Consultant of PT Bank Agro Tbk (2011);
- Operational Risk Management Consultant of PT Bank Mutiara Tbk (2013);
- Consultant for Mapping and Corporate Loans Portfolio Exposure Measurement of PT Perusahaan Gas Negara Tbk (2014); and
- Consultant of PT Bank Perkreditan Rakyat Sumber Artha Waru Agung, Sidoarjo (2018).

In addition, he holds positions at Bank Victoria as:

- Member of Audit Committee (since 2019); and
- Member of Integrated Governance Committee (since 2019).

### History of Previous Positions

- Held positions at PT Bank Dagang Negara as:
  - Officer Development Program* (1985-1986);
  - System and Procedure Department Staff - Electronic Data Processing Desk* (1986-1987);
  - Technical Support Department Staff - Electronic Data Processing Desk* (1988-1989);
  - MIDAS Application System Setup*, Los Angeles Agency, Los Angeles, USA (1989);
  - Programmer III - Electronic Data Processing Desk* (1989-1990);
  - Head of Application System Development Section – Information Technology Division* (1991-1994);
  - Head of Computer Operations Division - Information Technology Division* (1995-1996); and
  - Head of User Support Section - Information Technology Division* (1997-1998).
- Held positions at PT Bank Mandiri Tbk as:
  - Y2K Project Manager* (Legacy of PT Bank Dagang Negara) (1999);
  - Group Head, IT Deployment Branch – IT Retail Banking Services Delivery Division* (1999-2000);
  - Core Banking Application System Integration* (implementation in 600 branches) (1999-2000);
  - Senior Manager of Operational Risk Management Review – Operational Risk Department – Portfolio and Operational Risk Management Group* (2001-2004);
  - Team Leader of Business Line II – Operational Risk Department – Portfolio and Operational Risk Management Group* (2005-2006);
  - Trainer of Implementation and Workshop* on Operational Risk Management to ORM Coordinators for Regional Offices, Head Office, and Branch Offices of Timor Leste (2006-2010);
  - Team Leader of Policy – Operational Risk Department – Market and Operational Risk Group* (2007-2008); and
  - Team Leader of MIS – Operational Risk Department – Market and Operational Risk Group* (2009-2010).

### Certification

- Banking General Management from Indonesian Banking Development Institute (1990);
- Branch Management Course from Indonesian Banking Development Institute (1996);
- BASE-24 Applied Communications Inc. (ACI), Nebraska, USA (1996);
- Risk Management Certification Level 1 (2005);
- Public Speaking and Business Presentation* from Tantowi Yahya Public Speaking School (2006);
- Project Management Workshop*, ABN Amro (2006);
- Effective Interview Technique*, Bagus Brain Communication (2006);
- Risk Management Certification Level 2 (2007);
- Design Delivery Training*, Risk Management Academy, PT Bank Mandiri Tbk (2009);
- Training for Trainers of Risk Management Certification Level 2*, Bankers Association for Risk Management (2010);
- Risk Management Certification Refreshment Program*, Bankers Association for Risk Management (2015); and
- Risk Management Certification Refreshment Program*, Bankers Association for Risk Management (2020).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.



## Profil Komite Nominasi dan Remunerasi Nomination and Remuneration Committee's Profile

<b>Gunawan Tenggarahardja</b>	Ketua Komite Nominasi dan Remunerasi Chairman of Nomination and Remuneration Committee	Profil dapat dilihat pada bagian Profil Dewan Komisaris.
<b>Oliver Simorangkir</b>	Anggota Komite Nominasi dan Remunerasi Member of Nomination and Remuneration Committee	Profile can be seen in the Board of Commissioners profile chapter.

Ditunjuk menjadi Ketua dan Anggota berdasarkan Surat Keputusan Direksi No. 007/SK-DIR/07/18 tanggal 26 Juli 2018 (2018-2021).  
Appointed as Chairman and Member based on Board of Directors' Decision Letter No. 007/SK-DIR/07/18 dated 26 July 2018 (2018-2021).

<b>Syahda Candra</b>	Anggota Komite Nominasi dan Remunerasi Member of Nomination and Remuneration Committee	<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	48 tahun 48 years old
		<b>Domisili</b> Domicile	Jakarta	<b>Tempat Lahir</b> Place of Birth	Jakarta

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 007/SK-DIR/07/18 tanggal 26 Juli 2018 (2018-2021).

### Riwayat Pendidikan

Sarjana Psikologi dari Universitas Persada Indonesia YAI, Jakarta (1998).

### Rangkap Jabatan Saat Ini

Kepala Divisi HCM & General Affair Bank Victoria (sejak 2019).

### Riwayat Jabatan Sebelumnya

- Senior Staff Human Resource Department (Recruitment and Man Power) PT Bank Ekonomi Rahardja (1997-2000);
- Assistant Manager Human Resource Department PT Hawaii Confectionery Factory (2001-2002); dan
- Supervisor Human Resource Department PT JS Multi Collection (2002-2003).

Menjabat di Bank Victoria sebagai:

- Kepala Divisi Human Resource and General Affair (2003-2012);
- Kepala Divisi Human Capital Management (2012-2017); dan
- Kepala Divisi Human Resource and General Affair (2019).

### Sertifikasi

Sertifikasi bidang Manajemen Risiko Perbankan Level 3 dari Lembaga Sertifikasi Profesi Perbankan (2019-2021).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 007/SK-DIR/07/18 dated 26 July 2018 (2018-2021).

### Education

Bachelor of Psychology from Universitas Persada Indonesia YAI University, Jakarta (1998).

### Current Concurrent Positions

Head of HCM & General Affairs Division of Bank Victoria (since 2019).

### History of Previous Positions

- Senior Staff of Human Resource Department (Recruitment and Manpower) of PT Bank Ekonomi Rahardja (1997-2000);
- Assistant Manager of Human Resource Department of PT Hawaii Confectionery Factory (2001-2002); and
- Supervisor of Human Resource Department of PT JS Multi Collection (2002-2003).

Held positions at Bank Victoria as:

- Head of Human Resources and General Affairs Division (2003-2012);
- Head of Human Capital Management Division (2012-2017); and
- Head of Human Resources and General Affairs Division (2019).

### Certification

Certification in Banking Risk Management Level 3 from the Banking Profession Certification Institute (2019-2021).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

## Profil Komite Audit Audit Committee's Profile

<b>Gunawan Tenggarahardja</b>	Ketua Komite Audit Chairman of Audit Committee	Profil dapat dilihat pada bagian Profil Dewan Komisaris. Profile can be seen in the Board of Commissioners Profile section.
<b>Medi Sejati</b>	Anggota Komite Audit Member of Audit Committee	
<b>Yozef Abdulrachman</b>	Anggota Komite Audit Member of Audit Committee	Profil dapat dilihat pada bagian Profil Komite Pemantau Risiko. Profile can be seen in the Risk Monitoring Committee's Profile section.

Ditunjuk menjadi Ketua dan Anggota berdasarkan Surat Keputusan Direksi No. 007/SK-DIR/10/21 tanggal 26 Oktober 2021 (2021-Sekarang).  
Appointed as Chairman and Member based on Board of Directors' Decision Letter No. 007/SK-DIR/10/21 dated 26 October 2021 (2021-Now).

## Pejabat Eksekutif Executive Officers



### 1. Tjong Susanna

Senior Executive Vice President (SEVP) of Customer Relationship Management

### 2. Claudia Audrey

Senior Executive Vice President (SEVP) of Finance, Accounting & Strategic Performance Management

### 3. Muhammad Rakhmadhani

Senior Executive Vice President (SEVP) of Change Management Office

### 4. Yohanes

Senior Executive Vice President (SEVP) of Operations & International Banking

## Profil Pejabat Eksekutif Executive Officers Profile



### Tjong Susana

Senior Executive Vice President (SEVP)  
of Customer Relationship Management



#### Kewarganegaraan

Nationality  
Indonesia / Indonesian



#### Usia

Age  
41 tahun / years old



#### Domisili

Domicile  
Jakarta



#### Tempat Lahir

Place of Birth  
Singkawang

#### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 020/SK-DIR/HCM/01/21 tanggal 15 Januari 2021.

#### Riwayat Pendidikan

Sarjana Komputer dari Universitas Bina Nusantara (2007).

#### Riwayat Jabatan Sebelumnya

- Branch Manager Lokasari PT Lippo Bank Tbk (2003–2009);
- Executive Branch Manager Region 2 PT Bank Permata Tbk (2009–2018); dan
- Head of QNB First PT Bank QNB Indonesia (2018–2020).

#### Sertifikasi

Sertifikasi Manajemen Risiko Level 3 dari Lembaga Sertifikasi Profesi Perbankan (2019-2021).

#### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

#### Kemilikan Saham di Bank Victoria

Tidak ada.

#### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 020/SK-DIR/HCM/01/21, dated 15 January 2021.

#### Education

Bachelor of Computer Science from Bina Nusantara University (2007).

#### History of Previous Positions

- Lokasari Branch Manager of PT Lippo Bank Tbk (2003–2009);
- Region 2 Executive Branch Manager of PT Bank Permata Tbk (2009–2018); and
- Head of QNB First of PT Bank QNB Indonesia (2018–2020).

#### Certification

Risk Management Certification Level 3 from the Banking Profession Certification Institute (2019-2021).

#### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

#### Share Ownership in Bank Victoria

None.



## Claudia Audrey

Senior Executive Vice President (SEVP) of Finance, Accounting & Strategic Performance Management



### Kewarganegaraan

Nationality

Indonesia / Indonesian



### Usia

Age

35 tahun / years old



### Domisili

Domicile

Jakarta



### Tempat Lahir

Place of Birth

Jakarta

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 012/SK-DIR/HCM/12/21 tanggal 28 Desember 2021.

### Riwayat Pendidikan

Sarjana Ekonomi dari Universitas Indonesia (2009).

### Riwayat Jabatan Sebelumnya

- Auditor PwC (2009–2015);
- Finance & Accounting Vice Division Head PT Bank Victoria International Tbk (2015-2018);
- Finance & Accounting Division Head PT Bank Victoria International Tbk (2018-2021); dan
- Change Management Office Division Head PT Bank Victoria International Tbk (2021).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 012/SK-DIR/HCM/12/21 dated 28 December 2021.

### Education

Bachelor of Economics from Universitas Indonesia (2009).

### History of Previous Positions

- PwC's Auditor (2009–2015);
- Finance & Accounting Vice Division Head of PT Bank Victoria International Tbk (2015-2018);
- Finance & Accounting Division Head of PT Bank Victoria International Tbk (2018-2021); and
- Change Management Office Division Head PT Bank Victoria International Tbk (2021).

### Certification

Risk Management Certification Level 4 from the Banking Profession Certification Institute (2020-2022).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.



## Muhammad Rakhmadhani

Senior Executive Vice President (SEVP)  
of Change Management Office



**Kewarganegaraan**  
**Nationality**  
Indonesia / Indonesian



**Usia**  
**Age**  
47 tahun / years old



**Domisili**  
**Domicile**  
Jakarta Selatan  
/ South Jakarta



**Tempat Lahir**  
**Place of Birth**  
Jakarta

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 018/SK-DIR/HCM/11/20 tanggal 20 November 2020.

### Riwayat Pendidikan

- Diploma III *Actuarial Science* dari Universitas Indonesia (1997);
- Master of Science of Actuarial Science* dari University of the Philippines - Quezon City, Philippines (2001); dan
- Magister Bisnis Administrasi dan Sistem Informasi dari Universitas Bina Nusantara, Jakarta (2005).

### Rangkap Jabatan Saat Ini

- Chief of Business Development of Lippo Financial Group Holdings - Lippo Group* (2018-2020); dan
- Founder SimpanDuit - Start Up Fintech Company* (2019-2020).

### Riwayat Jabatan Sebelumnya

- Pricing Actuary Tugu Mandiri Insurance (Subsidiary of Pertamina)* (2002–2003);
- Pricing Actuary AIA Indonesia* (2003–2005);
- Pricing Actuary Manulife Financial* (2005–2006);
- Pricing/Marketing Actuary AIA Indonesia* (2006–2007);
- Head of Operations and Product of Insurance Business Group Citibank, N.A* (2007–2008);
- Group Head of Process, Policy and Control, Business Planning Customer Analytics Bank ANZ Indonesia* (2008–2013);
- Associate Director of Products, Ops, Tech, Marketing PT Bank Victoria International* (2013–2018);
- Chief of Business Development PT Lippo Securities Tbk, Lippo Financial Service Group* (2018-2020); dan
- Founder SimpanDuit Start Up Fintech Company* (2019-2020).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2021–2023).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 018/SK-DIR/HCM/11/20 dated 20 November 2020.

### Education

- Diploma III of Actuarial Science from Universitas Indonesia (1997).
- Master of Science of Actuarial Science from University of the Philippines - Quezon City, Philippines (2001); and
- Master of Business Administration and Information System from Bina Nusantara University, Jakarta (2005).

### Current Concurrent Positions

- Chief of Business Development of Lippo Financial Group Holdings - Lippo Group (2018-2020); and
- Founder of SimpanDuit - Start Up Fintech Company (2019-2020).

### History of Previous Positions

- Pricing Actuary of Tugu Mandiri Insurance (Subsidiary of Pertamina) (2002–2003);
- Pricing Actuary of AIA Indonesia (2003–2005);
- Pricing Actuary of Manulife Financial (2005–2006);
- Pricing/Marketing Actuary of AIA Indonesia (2006–2007);
- Head of Operations and Product of Insurance Business Group of Citibank, N.A (2007–2008);
- Group Head of Process, Policy and Control, Business Planning Customer Analytics of Bank ANZ Indonesia (2008–2013);
- Associate Director of Products, Ops, Tech, Marketing of PT Bank Victoria International (2013–2018);
- Chief of Business Development of PT Lippo Securities Tbk, Lippo Financial Service Group (2018-2020); and
- Founder SimpanDuit of Start Up Fintech Company (2019-2020).

### Certification

Risk Management Certification Level 5 from the Banking Profession Certification Institute (2021–2023).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.





## Yohanes

Senior Executive Vice President (SEVP) of Operations & International Banking



**Kewarganegaraan**  
Nationality  
Indonesia / Indonesian



**Usia**  
Age  
48 tahun / years old



**Domisili**  
Domicile  
Jakarta



**Tempat Lahir**  
Place of Birth  
Pangkal Pinang

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 021/SK-DIR/HCM/11/21 tanggal 29 November 2021.

### Riwayat Pendidikan

Sekolah Menengah Atas dari SMA Negeri 1 Pangkal Pinang (1991).

### Riwayat Jabatan Sebelumnya

- Account Officer Kantor Cabang Pluit PT Bank Lippo Tbk (1991–2000);
- Pimpinan Cabang Kantor Cabang Pembantu Gedung Tifa PT Bank Century Tbk (2000–2007);
- Kepala Divisi Operasi PT Bank Windu Kentjana International Tbk (2007–2016);
- Kepala Divisi Operasi PT Bank China Construction Bank Indonesia Tbk (2016–2017); dan
- Credit & Finance Director PT Bank Harda International Tbk (2017–2021).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2020–2022).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 021/SK-DIR/HCM/11/21 dated 29 November 2021.

### Education

Senior High School from SMA Negeri 1 Pangkal Pinang (1991).

### History of Previous Positions

- Account Officer at Pluit Branch Office of PT Bank Lippo Tbk (1991–2000);
- Head of Tifa Building Sub-Branch Office of PT Bank Century Tbk (2000–2007);
- Head of Operational Division of PT Bank Windu Kentjana International Tbk (2007–2016);
- Head of Operational Division of PT Bank China Construction Bank Indonesia Tbk (2016–2017); and
- Credit & Finance Director of PT Bank Harda International Tbk (2017–2021).

### Certification

Risk Management Certification Level 5 from the Banking Profession Certification Institute (2020–2022).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.



## Djoko Soendjojo

Kepala Divisi SKAI & Anti Fraud  
Head of SKAI & Anti-Fraud Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	53 tahun 53 years old
<b>Domisili</b> Domicile	Jakarta	<b>Tempat Lahir</b> Place of Birth	Surabaya

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 003/SK-DIR/HCM/01/19 tanggal 2 Januari 2019.

### Riwayat Pendidikan

Sarjana Ekonomi dari STIE Malangkucecwara Malang (1993).

### Riwayat Jabatan Sebelumnya

- Staff Senior Akuntansi dan Keuangan PT Bank Andromeda Kantor Pusat Jakarta (1995–1997);
- Staff Senior Akuntansi dan Keuangan PT Bank Alfa BBKU Kantor Pusat Jakarta (1997–1999);
- Staff Administrasi BBO-BBKU BBPN/IBRA Kantor Pusat Jakarta (2000–2004);
- Staff Senior Keuangan & Custody Tim Likuidasi PT Bank Prasadha Utama Kantor Pusat Jakarta (2004);
- Kepala Seksi Manajemen Risiko PT Bank Victoria International Tbk (2005);
- Kepala Seksi Financial Control PT Bank Victoria International Tbk (2005–2006);
- Kepala Satuan Kerja Audit Interen (SKAI) PT Bank Victoria International Tbk (2006); dan
- Kepala Divisi Administrasi Pengkreditan Bank Victoria (2015-2017).

### Sertifikasi

- Sertifikasi Audit Intern Level Auditor dari Lembaga Sertifikasi Profesi Perbankan (2019-2023); dan
- Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 003/SK-DIR/HCM/01/19 dated 2 January 2019.

### Education

Bachelor of Economics from STIE Malangkucecwara, Malang (1993).

### History of Previous Positions

- Senior Accounting and Finance Staff of PT Bank Andromeda Jakarta Head Office (1995–1997);
- Senior Accounting and Finance Staff of PT Bank Alfa BBKU Jakarta Head Office (1997-1999);
- Administration Staff of BBO-BBKU BBPN/IBRA Jakarta Head Office (2000–2004);
- Senior Staff of Finance & Custody Liquidation Team of PT Bank Prasadha Utama Jakarta Head Office (2004);
- Head of Risk Management Section of PT Bank Victoria International Tbk (2005);
- Head of Financial Control Section of PT Bank Victoria International Tbk (2005-2006);
- Head of Internal Audit unit (IAU) of PT Bank Victoria International Tbk (2006); and
- Head of Credit Administration Division of Bank Victoria (2015-2017).

### Certification

- Auditor Level of Internal Audit Certification from the Banking Profession Certification Institute (2019-2023); and
- Level 4 of Risk Management Certification from the Banking Profession Certification Institute (2020-2022).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Hermawan

Kepala Divisi *Risk Management/Integrated*  
Head of Risk Management/Integrated Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	51 tahun 51 years old
<b>Domisili</b> Domicile	Jakarta	<b>Tempat Lahir</b> Place of Birth	Jakarta

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 010/SK-DIR/HCM/07/15 tanggal 2 Juli 2015.

### Riwayat Pendidikan

- Diploma III dari Akademi Borobudur, Jakarta (1992);
- Sarjana Ekonomi dari Sekolah Tinggi Ilmu Ekonomi Yayasan Administrasi Indonesia, Jakarta (1995); dan
- Magister Manajemen dari Sekolah Tinggi Ilmu Manajemen Labora, Jakarta (1997).

### Riwayat Jabatan Sebelumnya

Memiliki pengalaman kerja dalam industri perbankan sejak tahun 1990 dan memegang beberapa posisi penting di antaranya:

- Pejabat Risiko Suku Bunga PT Bank UIB (2005-2006);
- Pimpinan Kelompok Strategi Perencanaan & Pengembangan Organisasi PT Bank Akita (2007-2009);
- Kepala Satuan Kerja Manajemen Risiko PT Bank Jasa Jakarta (2009-2013); dan
- Kepala Divisi Manajemen Risiko Bank Victoria (2013-2015).

### Sertifikasi

- International Certificate in Banking Risk and Regulation* (ICBRR) dari Global Association of Risk Professionals-Badan Sertifikasi Manajemen Risiko (GARP-BSMR) (2009);
- Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022); dan
- Sertifikasi Kepatuhan Level 1 dari Lembaga Sertifikasi Profesi Perbankan (2022-2025).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 010/SK-DIR/HCM/07/15 dated 2 July 2015.

### Education

- Diploma III from Borobudur Academy, Jakarta (1992);
- Bachelor of Economics from Sekolah Tinggi Ilmu Ekonomi Yayasan Administrasi Indonesia, Jakarta (1995); and
- Master of Management from Labora College of Management Sciences, Jakarta (1997).

### History of Previous Positions

Has work experience in the banking industry since 1990 and held several important positions including:

- Interest Rate Risk Officer of PT Bank UIB (2005-2006);
- Leader of Organizational Planning & Development Strategy Group of PT Bank Akita (2007-2009);
- Head of Risk Management Division of PT Bank Jasa Jakarta (2009-2013); and
- Head of Risk Management Division of Bank Victoria (2013-2015).

### Certification

- International Certificate in Banking Risk and Regulation (ICBRR) from the Global Association of Risk Professionals-Risk Management Certification Agency (GARP-BSMR) (2009);
- Risk Management Certification Level 4 from the Banking Profession Certification Institute (2020-2022); and
- Compliance Certification Level 1 from the Banking Profession Certification Institute (2022-2025).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None

## Purwono

Kepala Divisi *International Banking*  
Head of International Banking Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	69 tahun 69 years old
<b>Domisili</b> Domicile	Jakarta	<b>Tempat Lahir</b> Place of Birth	Jakarta

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 037/SK-DIR/HCM/08/18 tanggal 31 Agustus 2018.

### Riwayat Pendidikan

Magister Manajemen dari Universitas Erlangga, Surabaya (2000).

### Riwayat Jabatan Sebelumnya

- Kepala Bagian PT Bank Dagang Negara (Persero) (1976–1999);
- Bills Processing Manager* PT Bank Mandiri (Persero) Tbk (1999–2008);
- Kepala Keuangan PT Cahaya Barokah Makmur (2008–2010); dan
- Kepala Divisi *Financial Institution and Capital Market* Bank Victoria (2010-2018).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 037/SK-DIR/HCM/08/18 dated 31 August 2018.

### Education

Master of Management from Airlangga University, Surabaya (2000).

### History of Previous Positions

- Department Head of PT Bank Dagang Negara (Persero) (1976–1999);
- Bills Processing Manager* of PT Bank Mandiri (Persero) Tbk (1999–2008);
- Head of Finance Department of PT Cahaya Barokah Makmur (2008–2010); and
- Head of Financial Institution and Capital Market Division of Bank Victoria (2010-2018).

### Certification

Risk Management Certification Level 4 from the Banking Profession Certification Institute (2020-2022).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Ritayana

Kepala Divisi *Treasury*  
Head of Treasury Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	52 tahun 52 years old
<b>Domisili</b> Domicile	Jakarta	<b>Tempat Lahir</b> Place of Birth	Pontianak

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 002/SK-DIR/HCM/07/15 tanggal 2 Juli 2015.

### Riwayat Pendidikan

Sarjana Ekonomi dari Sekolah Tinggi Ilmu Ekonomi, Jakarta (1995).

### Riwayat Jabatan Sebelumnya

- Dealer Treasury* PT Bank Sewu (1993–1995); dan
- Staf Divisi *Treasury* Bank Victoria (1995-2011).

### Sertifikasi

- Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022); dan
- Sertifikasi Advance Treasury Dealer dari Lembaga Sertifikasi Profesi Perbankan (2022-2025).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 002/SK-DIR/HCM/07/15 dated 2 July 2015.

### Education

Bachelor of Economics from Sekolah Tinggi Ilmu Ekonomi, Jakarta (1995).

### History of Previous Positions

- Treasury Dealer of PT Bank Sewu (1993–1995); and
- Treasury Division Staff of Bank Victoria (1995-2011).

### Certification

- Risk Management Certification Level 4 from the Banking Profession Certification Institute (2020-2022); and
- Advanced Certification in Treasury Dealer from the Banking Profession Certification Institute (2022-2025).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Lidwina Dian Pratiwi

Kepala Divisi *Compliance/Integrated, AML, & System Procedure*

Head of Compliance/Integrated, AML, & System Procedure Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	40 tahun 40 years old
<b>Domisili</b> Domicile	Jakarta	<b>Tempat Lahir</b> Place of Birth	Pangkalan Brandan

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 011/SK-DIR/HCM/01/21 tanggal 11 Januari 2021.

### Riwayat Pendidikan

- Sarjana Hukum dari Universitas Indonesia (2003); dan
- Magister Kenotariatan dari Universitas Indonesia (2007).

### Riwayat Jabatan Sebelumnya

- Secretariat and Reporting Head* PT Bank UOB Indonesia (2008-2015);
- Senior Manager Regulatory Affair and Policy* PT Bank Ekonomi Raharja (2015–2016);
- Sub Manager Corporate Secretary* PT Bank Ganesha Tbk (2016-2018);
- Secretariat and Reporting Head* Bank Victoria (2018-2019); dan
- Kepala Divisi *Corporate Secretary* Bank Victoria (2019-2021).

### Sertifikasi

- Sertifikasi Manajemen Risiko Level 2 dari Lembaga Sertifikasi Profesi Perbankan (2020-2024); dan
- Sertifikasi Kepatuhan Level Officer dari Lembaga Sertifikasi Profesi Perbankan (2021-2024).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 011/SK-DIR/HCM/01/21 dated 11 January 2021.

### Education

- Bachelor of Law from Universitas Indonesia (2003); and
- Master of Notary from Universitas Indonesia (2007).

### History of Previous Positions

- Secretariat and Reporting Head* of PT Bank UOB Indonesia (2008-2015);
- Senior Manager Regulatory Affair and Policy* of PT Bank Ekonomi Raharja (2015–2016);
- Sub Manager Corporate Secretary* of PT Bank Ganesha Tbk (2016-2018);
- Secretariat and Reporting Head* of Bank Victoria (2018-2019); and
- Head of Corporate Secretary Division* of Bank Victoria (2019-2021).

### Certification

- Risk Management Certification Level 2 from the Banking Profession Certification Institute (2020-2024); and
- Officer Level of Compliance Certification from the Banking Profession Certification Institute (2021-2024).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Syahda Candra

Kepala Divisi *Human Capital Management & General Affair*

Head of Human Capital Management & General Affairs Division

Profil dapat dilihat dibagian profil Komite Nominasi dan Remunerasi.

Profile can be seen in the Nomination and Remuneration Committee's Profile section.

### Dasar Pengangkatan / Basis of Appointment

Surat Keputusan Direksi No. 008/SK-DIR/HCM/01/19 tanggal 2 Januari 2019.

Board of Directors' Decision Letter No. 008/SK-DIR/HCM/01/19 dated 2 January 2019.

## Caprie Ardira Azhar

Kepala Divisi *Corporate Secretary*  
Head of Corporate Secretary Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	34 tahun 34 years old
<b>Domisili</b> Domicile	Jakarta	<b>Tempat Lahir</b> Place of Birth	Jakarta

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 012/SK-DIR/HCM/01/21 tanggal 11 Januari 2021.

### Riwayat Pendidikan

Sarjana Hukum dari Universitas Padjadjaran (2012).

### Riwayat Jabatan Sebelumnya

- Associate Lawyer Makes & Partners Lawfirm (2012-2014);
- Legal & Corporate Secretary PT Victoria Investama Tbk (2014-2018);
- Head Legal and Compliance PT Sucor Sekuritas (2018-2019); dan
- Unit Head Corporate Secretary Bank Victoria (2019-2021).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 2 dari Lembaga Sertifikasi Profesi Perbankan (2020-2024).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 012/SK-DIR/HCM/01/21 dated 11 January 2021.

### Education

Bachelor of Law from Universitas Padjadjaran (2012).

### History of Previous Positions

- Associate Lawyer of Makes & Partners Lawfirm (2012-2014);
- Legal & Corporate Secretary of PT Victoria Investama Tbk (2014-2018);
- Head Legal and Compliance Sucor Sekuritas (2018-2019); and
- Unit Head Corporate Secretary of Bank Victoria (2019-2021).

### Certification

Risk Management Certification Level 2 from the Banking Profession Certification Institute (2020-2024).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Henry Indradjaja

Kepala Divisi *SME Banking*  
Head of SME Banking Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	55 tahun 55 years old
<b>Domisili</b> Domicile	Tangerang	<b>Tempat Lahir</b> Place of Birth	Tanjung Karang

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 007/SK-DIR/HCM/12/18 tanggal 11 Desember 2018.

### Riwayat Pendidikan

Sarjana Komputer dari Universitas Budi Luhur, Jakarta (1993).

### Riwayat Jabatan Sebelumnya

- Kepala Bagian Kredit dan Marketing Bank Umum Servitia (1986–1992);
- Wakil Pimpinan Capem – Tanjung Priok Panin Bank (1992–1993);
- Branch Manager Tanah Abang Bank Central Dagang (1993–1999);
- TPS – BBKU BPPN (1999);
- Direktur Utama BPR Varia Central Artha (1999–2001);
- Branch Manager Sawah Besar Bank Asiatic (2001–2004);
- Pemimpin Cabang Kepala Gading PT Bank Victoria International (2015–2018);
- Commercial Banking Vice Division Head PT Bank Victoria International Tbk (2018); dan
- SME and Consumer Banking Division Head PT Bank Victoria International Tbk (2018).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 007/SK-DIR/HCM/12/18 dated 11 December 2018.

### Education

Bachelor of Computer from Budi Luhur University, Jakarta (1993).

### History of Previous Positions

- Head of Credit and Marketing Department of Bank Umum Servitia (1986–1992);
- Vice Chairman of Tanjung Priok Branch Office of Panin Bank (1992–1993);
- Manager of Tanah Abang Branch of Bank Central Dagang (1993–1999);
- TPS – BBKU BPPN (1999);
- President Director of BPR Varia Central Artha (1999–2001);
- Manager of Sawah Besar Branch of Bank Asiatic (2001–2004);
- Purwokerto Branch Head of PT Bank Bukopin Tbk (2015-2018);
- Commercial Banking Vice Division Head of PT Bank Victoria International Tbk (2018); and
- SME & Consumer Banking division Head of PT Bank Victoria International Tbk (2018).

### Certification

Risk Management Certification Level 4 from the Banking Profession Certification Institute (2020-2022).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Theresia Maria Dhewajani

Kepala Divisi *Operations & Internal Control*  
Head of Operations & Internal Control Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	62 tahun 62 years old
<b>Domisili</b> Domicile	Semarang	<b>Tempat Lahir</b> Place of Birth	Semarang

### Dasar Pengangkatan

Surat Keputusan Direksi No. 013/SK-DIR/HCM/04/16 tanggal 4 April 2016.

### Riwayat Pendidikan

Sarjana Hukum dari Universitas 17 Agustus 1945, Semarang (1984).

### Riwayat Jabatan Sebelumnya

- Kepala Seksi PT Bank Internasional Indonesia (1983–1987);
- Legal Officer* PT Murthy Kurnia Utama (1987–1989); dan
- Operational Manager* Bank Tiara Cabang Jatinegara (1994–2000).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment

Board of Directors' Decision Letter No. 013/SK-DIR/HCM/04/16 dated 4 April 2016.

### Education

Bachelor of Law from Universitas 17 Agustus 1945, Semarang (1984).

### History of Previous Positions

- Section Head of PT Bank Internasional Indonesia (1983–1987);
- Legal Officer* of PT Murthy Kurnia Utama (1987-1989); and
- Operational Manager* of Bank Tiara Jatinegara Branch (1994–2000).

### Certification

Risk Management Certification Level 4 from the Banking Profession Certification Institute (2020-2022).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Yosef Sudikbyo

Kepala Divisi *Corporate Legal*  
Head of Corporate Legal Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	59 tahun 59 years old
<b>Domisili</b> Domicile	Jakarta	<b>Tempat Lahir</b> Place of Birth	Rembang

### Dasar Pengangkatan

Surat Keputusan Direksi No. 014/SK-DIR/HCM/06/15 tanggal 22 Juni 2015.

### Riwayat Pendidikan

- Sarjana Hukum dari Universitas Katolik Parahyangan, Bandung (1988); dan
- Pascasarjana Program Studi Kenotariatan dari Universitas Indonesia, Depok (2001).

### Riwayat Jabatan Sebelumnya

- Staf Legal Bank NISP (1988-1990);
- Manager Legal* Bank Ekonomi Raharja (1990-1997);
- Manager Legal* Bank Prasida (1997-2000); dan
- Koordinator Operasional Badan Penyehatan Perbankan Nasional (BPPN) (2000-2003).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 3 dari Lembaga Sertifikasi Profesi Perbankan (2021-2023).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment

Board of Directors' Decision Letter No. 014/SK-DIR/HCM/06/15 dated 22 June 2015.

### Education

- Bachelor of Laws from Parahyangan Catholic University, Bandung (1988); and
- Master of Notary from Universitas Indonesia, Depok (2001).

### History of Previous Positions

- Legal Staff of Bank NISP (1988-1990);
- Legal Manager* of Bank Ekonomi Raharja (1990-1997);
- Legal Manager* of Bank Prasida (1997-2000); and
- Operations Coordinator of Indonesian Bank Restructuring Agency (2000-2003).

### Certification

Risk Management Certification Level 3 from the Banking Profession Certification Institute (2021-2023).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.



## Herman Suwinta

Kepala Divisi *Special Asset Management*  
Head of Special Asset management Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	62 tahun 62 years old
<b>Domisili</b> Domicile	Jakarta	<b>Tempat Lahir</b> Place of Birth	Karawang

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 011/SK-DIR/HCM/02/21 tanggal 26 Februari 2021.

### Riwayat Pendidikan

Sarjana Ekonomi dari Universitas Kristen Indonesia (1982).

### Riwayat Jabatan Sebelumnya

- Admin Head ACC Cabang Tangerang PT Astra Credit Company (1990–1993);
- Kepala Bagian Kredit Cabang Tangerang Jaya Abadi Motor (1993–1997);
- General Manager Marketing PT U Finance Indonesia (1997–2005);
- Direktur Marketing PT First Indo American Leasing (2005–2015); dan
- Direktur Utama PT Emperor Finance Indonesia (2018-2021).

### Sertifikasi

Tidak ada.

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors Decision No. 011/SK-DIR/HCM/02/21 dated 26 Februari 2021.

### Education

Bachelor of Economics from Universitas Kristen Indonesia (1982).

### History of Previous Positions

- ACC Admin Head of Tangerang Branch of PT Astra Credit Company (1990–1993);
- Credit Department Head of Tangerang Branch of Jaya Abadi Motor (1993–1997);
- Marketing General Manager of PT U Finance Indonesia (1997-2005);
- Marketing Director of PT First Indo American Leasing (2005–2015); and
- President Director of PT Emperor Finance Indonesia (2018-2021).

### Certification

None.

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Mira Christiana

Kepala Divisi *Corporate Lending, Multifinance & Consumer Banking*  
Head of Corporate Lending, Multifinance & Consumer Banking Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	43 tahun 43 years old
<b>Domisili</b> Domicile	Bekasi	<b>Tempat Lahir</b> Place of Birth	Semarang

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 004/SK-DIR/HCM/01/19 tanggal 2 Januari 2019.

### Riwayat Pendidikan

Sarjana Psikologi dari Universitas Diponegoro, Semarang (2003).

### Riwayat Jabatan Sebelumnya

- Senior Relationship Manager Bank Mandiri (2004–2013);
- Corporate Business Division Head of Bank JTrust Indonesia (2013–2017); dan
- Head of Corporate Credit PT Radana Bhaskara Finance Tbk (2017-2018).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 004/SK-DIR/HCM/01/19 dated 2 January 2019.

### Education

Bachelor of Psychology from Diponegoro University, Semarang (2003).

### History of Previous Positions

- Senior Relationship Manager of Bank Mandiri (2004–2013);
- Corporate Business Division Head of Bank JTrust Indonesia (2013–2017); and
- Head of Corporate Credit of PT Radana Bhaskara Finance Tbk (2017-2018).

### Certification

Risk Management Certification Level 4 from the Banking Profession Certification Institute (2020-2022).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Novita Indriyani

Wakil Kepala Divisi *Credit Legal*  
Vice Head of Credit Legal Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	51 tahun 51 years old
<b>Domisili</b> Domicile	Jakarta	<b>Tempat Lahir</b> Place of Birth	Jakarta

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 043/SK-DIR/HCM/07/18 tanggal 1 Agustus 2018.

### Riwayat Pendidikan

- Sarjana Hukum dari Universitas Tarumanagara, Jakarta (1995); dan
- Magister Kenotariatan dari Universitas Pelita Harapan, Tangerang (2019).

### Riwayat Jabatan Sebelumnya

Legal Officer Bank Ekonomi Raharja (1995-1997).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 043/SK-DIR/HCM/07/18 dated 1 August 2018.

### Education

- Bachelor of Law from Tarumanagara University, Jakarta (1995); and
- Master of Notary from Pelita Harapan University, Tangerang (2019).

### History of Previous Positions

Legal Officer of Bank Ekonomi Raharja (1995-1997).

### Certification

Risk Management Certification Level 4 from the Banking Profession Certification Institute (2020-2022).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Kokot Dananjoyo Sapsoko

Kepala Divisi *Loan & Trade Operations*  
Head of Loan & Trade Operations Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	48 tahun 48 years old
<b>Domisili</b> Domicile	Tangerang	<b>Tempat Lahir</b> Place of Birth	Yogyakarta

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 028/SK-DIR/HCM/08/19 tanggal 30 Agustus 2019.

### Riwayat Pendidikan

Sarjana Agrrikultur Universitas Gajah Mada (1997).

### Riwayat Jabatan Sebelumnya

- Back Office Staff PT Bank CIC Internasional Tbk (1998–1999);
- Authorized Signer PT Bank CIC Internasional Tbk (1999–2000);
- System and Procedure Staff PT Bank CIC Internasional (2000–2002);
- System and Procedure Department Head PT Bank CIC Internasional (2002–2009);
- Reconciliation and Reporting Department Head PT Bank Century, Tbk (2009–2010);
- Financial Control Division Head PT Bank Jtrust Tbk (2011–2016);
- Head of Operation Division concurrent position as Financial Control Division Head PT Bank Jtrust Tbk (2016);
- Head of Operations Division PT JTrust Indonesia Tbk (2016–2018); dan
- Technical Advisory Tjahjadi dan Tamara (Member of Morison KSI) Public Account Company (2018).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 028/SK-DIR/HCM/08/19 dated 30 August 2019.

### Education

Bachelor of Agriculture from Gajah Mada University (1997).

### History of Previous Positions

- Back Office Staff of PT Bank CIC Internasional Tbk (1998–1999);
- Authorized Signer of PT Bank CIC Internasional Tbk (1999–2000);
- System and Procedure Staff of PT Bank CIC Internasional (2000–2002);
- System and Procedure Department Head of PT Bank CIC Internasional (2002–2009);
- Reconciliation and Reporting Department Head of PT Bank Century, Tbk (2009–2010);
- Financial Control Division Head of PT Bank Jtrust Tbk (2011–2016);
- Head of Operation Division concurrent position as Financial Control Division Head of PT Bank Jtrust Tbk (2016);
- Head of Operations Division of PT JTrust Indonesia Tbk (2016–2018); and
- Technical Advisory of Tjahjadi dan Tamara (Member of Morison KSI) Public Account Company (2018).

### Certification

Risk Management Certification, Level 4, from the Banking Profession Certification Institute (2020-2022).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Hans Tanurahardja

Wakil Kepala Divisi *Credit Monitoring & Assurance*  
Vice Head of Credit Monitoring & Assurance Division

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	47 tahun 47 years old
<b>Domisili</b> Domicile	Jakarta	<b>Tempat Lahir</b> Place of Birth	Bandung

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 008/SK-DIR/HCM/07/19 tanggal 1 Agustus 2019.

### Riwayat Pendidikan

- Sarjana Ekonomi Akuntansi dari Universitas Kristen Maranatha, Bandung (1998); dan
- Magister Manajemen Universitas Katolik Parahyangan, Bandung (1998).

### Riwayat Jabatan Sebelumnya

- Technical Assistant Staff* Kantor Akuntan Publik Bambang Budi Tresno (2002–2004); dan
- Commercial Lending Vice Division Head* Bank Victoria (2019).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2020-2022).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 008/SK-DIR/HCM/07/19 dated 1 August 2019.

### Education

- Bachelor of Economics, Accounting, from Kristen Maranatha, Bandung (1998); and
- Master of Management from Parahyangan Catholic University, Bandung (1998).

### History of Previous Positions

- Technical Assistant Staff of Bambang Budi Tresno Public Accounting Firm (2002–2004); and
- Commercial Lending Vice Division Head of Bank Victoria (2019).

### Certification

Risk Management Certification Level 4 from the Banking Profession Certification Institute (2020-2022).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Putri Tiara Virginta

Kepala Unit *Marketing Communication*  
Head of Marketing Communication Unit

<b>Kewarganegaraan</b> Nationality	Indonesia Indonesian	<b>Usia</b> Age	41 tahun 41 years old
<b>Domisili</b> Domicile	Depok	<b>Tempat Lahir</b> Place of Birth	Jakarta

### Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 010/SK-DIR/HCM/11/20 tanggal 5 November 2020.

### Riwayat Pendidikan

Sarjana Ilmu Sosial dari Universitas Prof. Dr. Moestopo (Beragama), Jakarta (2003).

### Riwayat Jabatan Sebelumnya

- Public Relation* Lippobank (2003–2012); dan
- Brand and Corporate Marketing Manager* UOB Indonesia Bank (2012-2013).

### Sertifikasi

Sertifikasi Manajemen Risiko Level 1 dari Lembaga Sertifikasi Profesi Perbankan (2021–2025).

### Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

### Kemilikan Saham di Bank Victoria

Tidak ada.

### Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 010/SK-DIR/HCM/11/20 dated 5 November 2020.

### Education

Bachelor of Social Sciences from University of Prof. Dr. Moestopo (Beragama), Jakarta (2003).

### History of Previous Positions

- Public Relation of Lippobank (2003–2012); and
- Brand and Corporate Marketing Manager of UOB Indonesia Bank (2012-2013).

### Certification

Risk Management Certification Level 1 from the Banking Profession Certification Institute (2021–2025).

### Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

### Share Ownership in Bank Victoria

None.

## Profil Kepala Kantor Cabang Utama

### Profile of Main Branch Office Head

<b>Franky Lazuardi</b> Kepala KCU Senayan Head of Senayan Main Branch Office	<b>Amelia</b> Kepala KCU Cideng Head of Cideng Main Branch Office	<b>Yacob Chandra</b> Kepala KCU Fatmawati Head of Fatmawati Main Branch Office
<b>Armand Kusuma</b> Wakil Kepala KCU Kelapa Gading Deputy Head of Kelapa Gading Main Branch Office	<b>Rosita B Rajaisun</b> Kepala KCU Bogor Head of Bogor Main Branch Office	<b>Erli Nornawati</b> Kepala KCU Surabaya Head of Surabaya Main Branch Office
<b>Theresia Sri Pakarti</b> Kepala KCU Bandung Head of Bandung Main Branch Office	<b>Daisy Merry Natalia F</b> Kepala KCU Manado Head of Manado Main Branch Office	<b>Tapa Jaya Sukmana</b> Kepala KCU Bali Head of Bali Main Branch Office
<b>Untung Tjahjono</b> Kepala KCU Semarang Head of Semarang Main Branch Office	<b>Hans Muliauwan</b> Kepala KCU Makassar Head of Makassar Main Branch Office	<b>Febyra Asia Rini</b> Kepala KCU Solo Head of Solo Main Branch Office
<b>Jane Alexandra Herman</b> Kepala KCU BIP Head of BIP Main Branch Office		<b>Wiwi Candra</b> Kepala KCU Medan Head of Medan Main Branch Office

## Keanggotaan dalam Asosiasi

### Association Membership

Nama Asosiasi Name of Association	Skala Asosiasi Scale of Association	Posisi Bank Bank Position
Lembaga Penjamin Simpanan Indonesia Deposit Insurance Corporation	Nasional National	Anggota Member
PT Kustodian Sentral Efek Indonesia Indonesia Central Securities Depository	Nasional National	Anggota Member
Perhimpunan Bank-Bank Umum Nasional (PERBANAS) Association of National Commercial Banks (PERBANAS)	Nasional National	Anggota Direktur Utama sebagai Pengurus Member President Director as the Administrator
Asosiasi Emiten Indonesia (AEI) Indonesian Public Listed Companies Association (AEI)	Nasional National	Anggota Member
Ikatan Bankir Indonesia (IBI) Indonesia Banker Institute (IBI)	Nasional National	Anggota Member

Nama Asosiasi Name of Association	Skala Asosiasi Scale of Association	Posisi Bank Bank Position
Bankers Association for Risk Managemet (BARA)	Nasional National	Anggota Member
Lembaga Alternatif Penyelesaian Sengketa Perbankan Indonesia (LAPSPI) Indonesian Alternative Agencies for Banking Dispute Resolution (LAPSI)	Nasional National	Anggota Member
Indonesian Corporate Secretary Association (ICSA)	Nasional National	Anggota Member
Asosiasi Sistem Pembayaran Indonesia (ASPI) Indonesia Payment System Association (ASPI)	Nasional National	Anggota Member
Perhimpunan Pedagang Surat Utang (HIMDASUN) Bond Traders Association (HIMDASUN)	Nasional National	Anggota Member

## Struktur Kepemilikan Saham Shareholders Structure

Komposisi kepemilikan saham Bank Victoria per 31 Desember 2021 berdasarkan Surat PT Adimitra Jasa Korpora No. LB-01/BVIC/012022 tanggal 5 Januari 2022 tentang Laporan Bulanan Komposisi Pemegang Saham Bank ditunjukkan sebagai berikut.

The composition of Bank Victoria's shareholding as of 31 December 2021 based on Letter of PT Adimitra Jasa Korpora No. LB-01/BVIC/012022 dated 5 January 2022 on the Bank's Monthly Report on Shareholders Composition is as shown below.







## Komposisi Pemegang Saham Shareholders Composition

Uraian Description	31 Desember 2021 31 December 2021			1 Januari 2021 1 January 2021		
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total (Rp)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total (Rp)
<b>SAHAM DENGAN SERTIFIKAT KOLEKTIF / SHARES WITH COLLECTIVE CERTIFICATES</b>						
1. Pemegang Saham Pendiri Founders' Shares	-	-	-	-	-	-
2. Masyarakat Public						
a. Pemodal Nasional National Investor						
• 5% atau lebih 5% or more	-	-	-	-	-	-
• Lainnya Others	1,165,500	0.01	116,550,000	1,165,500	0.01	116,550,000
b. Pemodal Asing Foreign Investors						
• 5% atau lebih 5% or more	-	-	-	-	-	-
• Lainnya Others	24,500	0.00	2,450,000	24,500	0.00	2,450,000
<b>Sub Total</b>	<b>1,190,000</b>	<b>0.01</b>	<b>119,000,000</b>	<b>1,190,000</b>	<b>0.01</b>	<b>119,000,000</b>
<b>SAHAM DENGAN PENITIPAN KOLEKTIF PT KUSTODIAN SENTRAL EFEK INDONESIA / SHARES IN COLLECTIVE CUSTODY WITH PT KUSTODIAN SENTRAL EFEK INDONESIA</b>						
1. Pemegang Saham Pendiri Founders Shares						
a. PT Nata Patindo	395,484,865	3.77	39,548,486,500	395,484,865	4.42	39,548,486,500
2. Masyarakat Public						
a. Pemodal Nasional National Investor						
• 5% atau lebih 5% or more						
Suzanna Tanojo	1,538,152,114	14.67	153,815,211,400	1,538,152,114	17.18	153,815,211,400
PT Victoria Investama Tbk	4,128,870,132	39.37	412,887,013,200	4,094,737,242	45.74	409,473,724,200
• Lainnya Others	2,685,703,559	25.61	268,570,355,900	1,525,053,720	17.04	152,505,372,000
b. Pemodal Asing Foreign Investors						
• 5% atau lebih 5% or more						
DEG-Deutsche Investitions- Und Entwicklungsgesellschaft MbH	780,394,335	7.44	78,039,433,500	780,394,335	8.72	78,039,433,500
• Lainnya Others	957,337,563	9.13	95,733,756,300	616,934,763	6.89	61,693,476,300
<b>Sub Total</b>	<b>10,485,942,568</b>	<b>99.99</b>	<b>1,048,594,256,800</b>	<b>8,950,757,039</b>	<b>99.99</b>	<b>895,075,703,900</b>
<b>Total</b>	<b>10,487,132,568</b>	<b>100.00</b>	<b>1,048,713,256,800</b>	<b>8,951,947,039</b>	<b>100.00</b>	<b>895,194,703,900</b>

## Komposisi Pemegang Saham berdasarkan Status Kepemilikan

### Shareholders Composition by Ownership Status

Uraian Description	31 Desember 2021 31 December 2021			1 Januari 2021 1 January 2021		
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Investor (Rp)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Investor (Rp)
<b>SCRIPTLESS</b>						
<b>Pemodal Nasional</b> National Investors						
Perorangan Individuals	2,786,854,816	26.57	12,218	2,110,535,316	23.58	1,478
Perseroan Terbatas Limited Liability Companies	5,502,711,248	52.47	34	5,218,331,319	58.29	17
Broker	111,245,914	1.06	4	155,745,914	1.74	4
Asuransi Insurance	347,398,692	3.31	3	31,646,892	0.35	1
Dana Pensiun Pension Funds	-	-	-	9,656,000	0.11	1
Reksadana Mutual Fund	-	-	-	27,512,500	0.31	2
<b>Pemodal Asing</b> Foreign Investors						
Perorangan Individual	243,010,015	2.32	12	266,125,315	2.97	8
Institusi Asing Foreign Institutions	1,494,721,883	14.25	15	1,131,203,783	12.64	9
<b>SCRIPT</b>						
<b>Pemodal Nasional</b> National Investors						
Perorangan Individuals	1,062,000	0.01	132	1,062,000	0.01	132
Perseroan Terbatas Limited Liability Companies	500	0.00	1	500	0.00	1
Reksadana Mutual Fund	15,000	0.00	1	15,000	0.00	1
Asuransi Insurance	88,000	0.00	3	88,000	0.00	3
<b>Pemodal Asing</b> Foreign Investors						
Perorangan Individual	24,500	0.00	7	24,500	0.00	7
Institusi Asing Foreign Institutions	-	-	-	-	-	-
<b>Total</b>	<b>10,487,132,568</b>	<b>100.00</b>	<b>12,430</b>	<b>8,951,947,039</b>	<b>100.00</b>	<b>1,664</b>

## Komposisi 20 Pemegang Saham Terbesar

### Composition of Top 20 Shareholders

Uraian Description	Domisili Domicile	Status	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)
<b>31 Desember 2021 / 31 December 2021</b>				
PT Victoria Investama Tbk	Jakarta	Institusi Lokal / Local Institution	4,128,870,132	39.37
Suzanna Tanojo	Jakarta	Institusi Lokal / Local Institution	1,538,152,114	17.18
Deutsche Investitions - Und Entwicklungsgesellschaft Mbh	Jerman	Institusi Asing / Foreign Institution	780,394,335	7.44
PT Gratamulia Pratama	Jakarta	Institusi Lokal / Local Institution	418,953,250	3.99
PT Nata Patindo	Jakarta	Institusi Lokal / Local Institution	395,484,865	3.77
UBS AG Singapore S/A Chemical Asia Corp Pte Ltd - 2091144679	Singapura Singapore	Institusi Asing / Foreign Institution	360,000,000	3.43
Credit Suisse AG Singapore Branch Trust Account Clients	Singapura Singapore	Institusi Asing / Foreign Institution	349,503,648	3.33
PT Regis Pratama Indonesia	Jakarta	Institusi Lokal / Local Institution	277,053,289	2.64
Louise Li	Singapura Singapore	Institusi Asing / Foreign Institution	237,484,815	2.26
PT Victoria Alife	Jakarta	Institusi Lokal / Local Institution	179,262,892	1.71
PT Victoria Insurance Tbk	Jakarta	Institusi Lokal / Local Institution	168,135,800	1.61
PT Bhuanatala Indah Permai Tbk	Jakarta	Institusi Lokal / Local Institution	117,346,900	1.12
PT Victoria Sekuritas Indonesia	Jakarta	Institusi Lokal / Local Institution	111.086.164	1.06
Christine T Alias Liauw Tjeuw H	Jakarta	Institusi Lokal / Local Institution	109,825,000	1.05
Luciana Tanoyo	Jakarta	Institusi Lokal / Local Institution	104,781,000	1.00
PT Emperor Finance Indonesia	Jakarta	Institusi Lokal / Local Institution	65,000,050	0.62
Sutanto	Jakarta	Institusi Lokal / Local Institution	56,000,000	0.53
Haryanto Leenardi	Jakarta	Institusi Lokal / Local Institution	41,920,000	0.40
PT Tridaya Investindo	Jakarta	Institusi Lokal / Local Institution	25,000,000	0.24
Teddy Jeffrey Katuari	Jakarta	Institusi Lokal / Local Institution	20,684,550	0.20
<b>1 Januari 2021 / 1 January 2021</b>				
PT Victoria Investama Tbk	Jakarta	Institusi Lokal / Local Institution	4,094,737,242	45.74
Suzanna Tanojo	Jakarta	Institusi Lokal / Local Institution	1,538,152,114	17.18
Deutsche Investitions - Und Entwicklungsgesellschaft Mbh	Jerman Germany	Institusi Asing / Foreign Institution	780,394,335	8.72
PT Gratamulia Pratama	Jakarta	Institusi Lokal / Local Institution	418,953,250	4.68
PT Nata Patindo	Jakarta	Institusi Lokal / Local Institution	395,484,865	4.42
Credit Suisse AG Singapore Branch Trust Account Clients	Singapura Singapore	Institusi Asing / Foreign Institution	349,503,648	3.90
Louise Li	Singapura Singapore	Institusi Asing / Foreign Institution	237,484,815	2.65
PT Victoria Sekuritas Indonesia	Jakarta	Institusi Lokal / Local Institution	143,391,064	1.60
Christine T Alias Liauw Tjeuw H	Surabaya	Institusi Lokal / Local Institution	109,825,000	1.23
Luciana Tanoyo	Surabaya	Institusi Lokal / Local Institution	104,781,000	1.17

Uraian Description	Domisili Domicile	Status	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)
PT Regis Pratama Indonesia	Jakarta	Institusi Lokal / Local Institution	97,792,250	1.09
PT Tri Daya Investindo	Jakarta	Institusi Lokal / Local Institution	78,187,500	0.87
Sutanto	Jakarta	Institusi Lokal / Local Institution	63,413,400	0.71
PT Victoria Manajemen Investasi	Jakarta	Institusi Lokal / Local Institution	48,792,400	0.55
PT Emperor Finance Indonesia	Jakarta	Institusi Lokal / Local Institution	48,329,250	0.54
Haryanto Leenardi	Jakarta	Institusi Lokal / Local Institution	41,920,000	0.47
Teddy Jeffrey Katuari	Jakarta	Institusi Lokal / Local Institution	32,381,350	0.36
PT Victoria Alife Indonesia	Jakarta	Institusi Lokal / Local Institution	31,646,892	0.35
Reksa Dana Campuran Victoria Jupiter	Jakarta	Institusi Lokal / Local Institution	26,800,000	0.30
Vonny Setiawaty	Jakarta	Institusi Lokal / Local Institution	26,691,150	0.30

## Komposisi Pemegang Saham yang Memiliki 5% atau Lebih Saham

### Composition of Shareholders with 5% or More Shares

Uraian	31 Desember 2021 31 December 2021		1 Januari 2021 1 January 2021		Description
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	
PT Victoria Investama Tbk	4,128,870,132	39.37	4,094,737,242	45.74	PT Victoria Investama Tbk
Suzanna Tanojo	1,538,152,114	14.67	1,538,152,114	17.18	Suzanna Tanojo
DEG-Deutsche Investitions-Und Entwicklungsgesellschaft MbH	780,394,335	7.44	780,394,335	8.72	DEG-Deutsche Investitions-Und Entwicklungsgesellschaft MbH

## Komposisi Pemegang Saham Masyarakat dengan Kepemilikan Saham Masing-masing Kurang dari 5%

### Composition of Public Shareholders with Share Ownership of Less than 5% Each

Uraian	31 Desember 2021 31 December 2021		1 Januari 2021 1 January 2021		Description
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	
<b>Pemodal Nasional / National Investors</b>					
Perorangan	1,249,764,702	11.92	573,445,202	6.41	Individuals
Perseroan Terbatas	1,373,841,616	13.10	1,123,682,577	12.55	Limited Liability Companies
Dana Pensiun	-	-	9,656,000	0.11	Pension Funds
Asuransi	347,486,692	3.31	31,646,892	0.35	Insurance
Reksadana	15,000	0.00	27,527,500	0.31	Mutual Funds
Broker	111,245,914	1.06	155,745,914	1.74	Broker
<b>Pemodal Asing / Foreign Investors</b>					
Perorangan	243,034,515	2.32	266,149,815	2.97	Individuals
Institusi Asing	714,327,548	6.81	350,809,448	3.92	Foreign Institutions
<b>Total</b>	<b>4,039,715,987</b>	<b>38.52</b>	<b>2,538,663,348</b>	<b>28.36</b>	<b>Total</b>

## Kepemilikan Saham Dewan Komisaris dan Direksi

### Share Ownership of Board of Commissioners and Board of Directors

#### Kebijakan Pengungkapan Informasi

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 11/POJK.04/2017 tentang Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Perusahaan Terbuka, setiap anggota Dewan Komisaris dan Direksi diwajibkan untuk menyampaikan informasi kepada Bank mengenai kepemilikan dan setiap perubahan kepemilikannya atas saham Bank paling lambat 3 (tiga) hari kerja setelah terjadinya transaksi. Selanjutnya, Bank menyampaikan laporan kepada Otoritas Jasa Keuangan atas transaksi tersebut paling lambat 10 (sepuluh) hari sejak terjadinya transaksi. Terkait hal tersebut, Bank telah menyampaikan laporan bulanan kepemilikan saham anggota Dewan Komisaris dan Direksi selama tahun 2021 melalui *e-reporting* kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia.

#### Information Disclosure Policy

Based on Financial Services Authority Regulation No. 11/POJK.04/2017 on Shareholding Report or Each Change on Public Companies Shareholding, each member of the Board of Commissioners and Board of Directors is required to submit information to the Bank regarding their shareholding and changes on shareholding in the Bank no later than 3 (three) business days after such transaction. Thereafter, the Bank will submit a report to the Financial Services Authority for such transaction the latest by 10 (ten) days from the transaction date. Related to this matter, the Bank has submitted Board of Commissioners and Board of Directors monthly shareholding report for 2021 through *e-reporting*, to the Financial Services Authority and Indonesia Stock Exchange.

## Pengungkapan Kepemilikan Saham

Per 31 Desember 2021, kepemilikan saham anggota Dewan Komisaris dan Direksi di Bank Victoria, baik secara langsung maupun tidak langsung, ditunjukkan sebagai berikut.

## Disclosure of Share Ownership

As of 31 December 2021, the Board of Commissioners and Board of Directors' shareholding information in Bank Victoria, either directly or indirectly is as shown below.

Uraian Description	Jabatan Position	31 Desember 2021 31 December 2021				1 Januari 2021 1 January 2021			
		Kepemilikan Saham Langsung pada Bank Victoria Direct Share Ownership in Bank Victoria		Kepemilikan Saham Tidak Langsung pada Bank Victoria Indirect Share Ownership in Bank Victoria		Kepemilikan Saham Langsung pada Bank Victoria Direct Share Ownership in Bank Victoria		Kepemilikan Saham Tidak Langsung pada Bank Victoria Indirect Share Ownership in Bank Victoria	
		Lembar Saham Number of Shares	Kepemilikan Saham Share Ownership (%)	Lembar Saham Number of Shares	Kepemilikan Saham Share Ownership (%)	Lembar Saham Number of Shares	Kepemilikan Saham Share Ownership (%)	Lembar Saham Number of Shares	Kepemilikan Saham Share Ownership (%)
<b>Dewan Komisaris / Board of Commissioners</b>									
Oliver Simorangkir	Komisaris Utama President Commissioner	-	-	-	-	-	-	-	-
Gunawan Tenggarahardja	Komisaris/ Komisaris Independen Commissioner/ Independent Commissioner	-	-	-	-	-	-	-	-
Zaenal Abidin, PhD	Komisaris/ Komisaris Independen Commissioner/ Independent Commissioner	-	-	-	-	-	-	-	-
<b>Direksi / Board of Directors</b>									
Ahmad Fajar	Direktur Utama President Director	-	-	-	-	-	-	-	-
Rusli	Wakil Direktur Utama Deputy President Director	-	-	-	-	-	-	-	-
Lembing	Direktur Bisnis Business Director	-	-	-	-	-	-	-	-
Debora Wahjutirto Tayono	Direktur Keuangan Finance Director	-	-	-	-	-	-	-	-
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Compliance and Risk Management Director	-	-	-	-	-	-	-	-



## Kronologi Pencatatan Saham

### Chronology of Share Listing

Uraian Description	Tanggal Pelaksanaan Exercise Date	Total Saham yang Diterbitkan (Lembar Saham) Issued (Number of Shares)	Nilai Nominal Nominal Value (Rp)	Harga Penawaran Offering Price (Rp)	Total Saham Beredar (Lembar Saham) Total Outstanding Shares (Number of Shares)	Bursa Pencatatan Saham Stock Exchange
Saham Pendiri Founders' Shares		250,000,000	100	-	250,000,000	
Saham dari Kapitalisasi Saldo Laba Shares from Capitalization of Retained Earnings		34,000,000	100	-	284,000,000	
Penawaran Umum Perdana Saham Initial Public Offering	1999	250,000,000	100	100	534,000,000	Bursa Efek Indonesia Indonesia Stock Exchange
Penawaran Umum Terbatas I dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering I with Preemptive Rights	2000	100,000,000	100	115	634,000,000	Bursa Efek Indonesia Indonesia Stock Exchange
Pelaksanaan Waran Seri I dan II Exercise of Series I and II Warrants	2002	66,793,400	100	-	700,793,400	Bursa Efek Indonesia Indonesia Stock Exchange
Penawaran Umum Terbatas II dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering II with Preemptive Rights	2003	400,000,000	100	100	1,100,793,400	Bursa Efek Indonesia Indonesia Stock Exchange
Pelaksanaan Waran Seri III Exercise of Series III Warrants	2004	193,799,960	100	-	1,294,593,360	Bursa Efek Indonesia Indonesia Stock Exchange
Pelaksanaan Waran Seri III Exercise of Series III Warrants	2006	46,200,000	100	-	1,340,793,360	Bursa Efek Indonesia Indonesia Stock Exchange
Penawaran Umum Terbatas III dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering III with Preemptive Rights	2006	670,363,760	100	100	2,011,157,120	Bursa Efek Indonesia Indonesia Stock Exchange
Pelaksanaan Waran Seri IV Exercise of Series IV Warrants	2007	323,840,000	100	100	2,334,997,120	Bursa Efek Indonesia Indonesia Stock Exchange
Penawaran Umum Terbatas IV dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering IV with Preemptive Rights	2008	1,167,498,560	100	100	3,502,495,680	Bursa Efek Indonesia Indonesia Stock Exchange
Pelaksanaan Waran Seri IV dan V Exercise of Series IV and V Warrants	2009	344,244,500	100	100	3,846,740,180	Bursa Efek Indonesia Indonesia Stock Exchange
Pelaksanaan Waran Seri IV dan V Exercise of Series IV and V Warrants	2010	249,707,135	100	100	4,096,447,315	Bursa Efek Indonesia Indonesia Stock Exchange

Uraian Description	Tanggal Pelaksanaan Exercise Date	Total Saham yang Diterbitkan (Lembar Saham) Issued (Number of Shares)	Nilai Nominal Nominal Value (Rp)	Harga Penawaran Offering Price (Rp)	Total Saham Beredar (Lembar Saham) Total Outstanding Shares (Number of Shares)	Bursa Pencatatan Saham Stock Exchange
Penawaran Umum Terbatas V dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering V with Preemptive Rights	2011	1,954,919,259	100	100	6,051,366,574	Bursa Efek Indonesia Indonesia Stock Exchange
Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu Limited Public Offering Without Preemptive Rights	2011	414,580,000	100	100	6,465,946,574	Bursa Efek Indonesia Indonesia Stock Exchange
Pelaksanaan Waran Seri IV dan V Exercise of Series IV and V Warrants	2011	81,724,314	100	100	6,547,670,888	Bursa Efek Indonesia Indonesia Stock Exchange
Pelaksanaan Waran Seri V dan VI Exercise of Series V and VI Warrants	2012	56,673,554	100	100	6,604,344,442	Bursa Efek Indonesia Indonesia Stock Exchange
Pelaksanaan Waran Seri V dan VI Exercise of Series V and VI Warrants	2013	25,923,831	100	100	6,630,268,273	Bursa Efek Indonesia Indonesia Stock Exchange
Pelaksanaan Waran Seri VI Exercise of Series VI Warrants	2014	508,898,707	100	100	7,139,166,980	Bursa Efek Indonesia Indonesia Stock Exchange
Pelaksanaan Waran Seri VI Exercise of Series VI Warrants	2015	300	100	100	7,139,167,280	Bursa Efek Indonesia Indonesia Stock Exchange
Pelaksanaan Waran Seri VI Exercise of Series VI Warrants	2016	751,486,547	100	100	7,890,653,827	Bursa Efek Indonesia Indonesia Stock Exchange
Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase Without Preemptive Rights	2016	780,394,335	100	100	8,671,048,162	Bursa Efek Indonesia Indonesia Stock Exchange
Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase Without Preemptive Rights	2019	280,898,877	100	356	8,951,947,039	Bursa Efek Indonesia Indonesia Stock Exchange
Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase Without Preemptive Rights	2021	586,205,939	100	160	9,538,152,978	Bursa Efek Indonesia Indonesia Stock Exchange
Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase Without Preemptive Rights	2021	948,979,590	100	196	10,487,132,568	Bursa Efek Indonesia Indonesia Stock Exchange
<b>Total Modal Saham yang Ditempatkan dan Disetor Penuh Total Fully Issued and Paid-Up Capital Shares</b>					<b>10,487,132,568</b>	

## Kronologi Pencatatan Obligasi Chronology of Bond Listing

Uraian Description	Total (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Terbit Issuance Dates	Tanggal Jatuh Tempo Maturity Dates	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status
Obligasi Bank Victoria I Tahun 2000 dengan tingkat suku bunga tetap Seri A Bank Victoria Series A Bond I of 2000 at fixed interest rate	75,000	7	16.25	3 Maret 2000 3 March 2000	3 Maret 2007 3 March 2007	BBB+ dari PT Kasnic Duff dan Phelps Credit rating Indonesia BBB+ from PT Kasnic Duff and Phelps Credit Rating Indonesia	BBB+ dari PT Kasnic Duff dan Phelps Credit rating Indonesia BBB+ from PT Kasnic Duff and Phelps Credit Rating Indonesia	Lunas Paid
Obligasi Bank Victoria I Tahun 2000 dengan tingkat suku bunga mengambang Seri B Bank Victoria Series B Bond I of 2000 at floating interest rate	25,000	7	16.00 (kupon bunga ke-1 dan 2) serta mengambang (kupon bunga ke-3 sampai ke-28) 16.00 (1 <sup>st</sup> and 2 <sup>nd</sup> interest coupon) and floating (3 <sup>rd</sup> to 28 <sup>th</sup> interest coupon)	3 Maret 2000 3 March 2000	3 Maret 2007 3 March 2007	BBB+ dari PT Kasnic Duff dan Phelps Credit rating Indonesia BBB+ from PT Kasnic Duff and Phelps Credit Rating Indonesia	BBB+ dari PT Kasnic Duff dan Phelps Credit rating Indonesia BBB+ from PT Kasnic Duff and Phelps Credit Rating Indonesia	Lunas Paid
Obligasi Bank Victoria II Tahun 2007 dengan tingkat suku bunga tetap Bank Victoria Bond II of 2007 at fixed interest rate	200,000	5	12.00	21 Maret 2007 21 March 2007	21 Maret 2012 21 March 2012	A3.id dari PT Moody's Indonesia (setara A- Kasnic) A3.id from PT Moody's Indonesia (equal to A-, Kasnic)	A3.id dari PT Moody's Indonesia (setara A- Kasnic) A3.id from PT Moody's Indonesia (equal to A-, Kasnic)	Lunas Paid
Obligasi Subordinasi Bank Victoria I Tahun 2007 dengan tingkat suku bunga tetap Bank Victoria Subordinated Bond I of 2007 at fixed interest rate	200,000	10	12.50 (tahun ke-1 sampai ke-5) serta 21.50 (tahun ke-6 sampai ke-10) 12.50 (1 <sup>st</sup> year to 5 <sup>th</sup> year) and 21.50 (6 <sup>th</sup> year to 10 <sup>th</sup> year)	21 Maret 2007 21 March 2007	21 Maret 2017 21 March 2017	Baa2.id dari PT Moody's Indonesia (setara BBB. Kasnic) Baa2.id from PT Moody's Indonesia (equal to BBB, Kasnic)	Baa2.id dari PT Moody's Indonesia (setara BBB. Kasnic) Baa2.id from PT Moody's Indonesia (equal to BBB, Kasnic)	Lunas Paid
Obligasi Bank Victoria III Tahun 2012 dengan tingkat suku bunga tetap Bank Victoria Bond III of 2012 at fixed interest rate	200,000	5	10.00	27 Juni 2012 27 June 2012	27 Juni 2017 27 June 2017	idBBB+ (Triple B plus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB+ (Triple B Plus) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB+ (Triple B plus) dari PT Pemeringkat Efek Indonesia (PEFINDO) IdBBB+ (Triple B Plus) from PT Pemeringkat Efek Indonesia (PEFINDO)	Lunas Paid

Uraian Description	Total (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Terbit Issuance Dates	Tanggal Jatuh Tempo Maturity Dates	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status
Obligasi Subordinasi Bank Victoria II Tahun 2012 dengan tingkat suku bunga tetap Bank Victoria Subordinated Bond II of 2012 at fixed interest rate	300,000	7	11.00	27 Juni 2012 27 June 2012	27 Juni 2019 27 June 2019	idBBB+ (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) IdBBB+ (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB+ (Triple B Plus) dari PT Pemeringkat Efek Indonesia (PEFINDO) IdBBB+ (Triple B Plus) from PT Pemeringkat Efek Indonesia (PEFINDO)	Lunas Paid
Obligasi Bank Victoria IV Tahun 2013 dengan tingkat suku bunga tetap Bank Victoria Bond IV of 2013 at fixed interest rate	200,000	5	9.50	27 Juni 2013 27 June 2013	27 Juni 2018 27 June 2018	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	Lunas Paid
Obligasi Subordinasi Bank Victoria III Tahun 2013 dengan tingkat suku bunga tetap Bank Victoria Subordinated Bond III of 2013 at fixed interest rate	300,000	7	10.50	27 Juni 2013 27 June 2013	27 Juni 2020 27 June 2020	idBBB+ (Triple B Plus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB+ (Triple B Plus) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB+ (Triple B Plus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB+ (Triple B Plus) from PT Pemeringkat Efek Indonesia (PEFINDO)	Lunas Paid
Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dengan tingkat suku bunga tetap Bank Victoria Continuous Bond I Phase I of 2017 at fixed interest rate	300,000	5	10.30	11 Juli 2017 11 July 2017	11 Juli 2022 11 July 2022	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dengan tingkat suku bunga tetap Bank Victoria Continuous Subordinated Bond I Phase I of 2017 at fixed interest rate	50,000	7	11.00	11 Juli 2017 11 July 2017	11 Juli 2024 11 July 2024	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat suku bunga tetap Seri A Bank Victoria Series A Continuous Bond I Phase II of 2018 at fixed interest rate	100,000	3	9.70	5 Juni 2018 5 June 2018	5 Juni 2021 5 June 2021	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	Lunas Paid

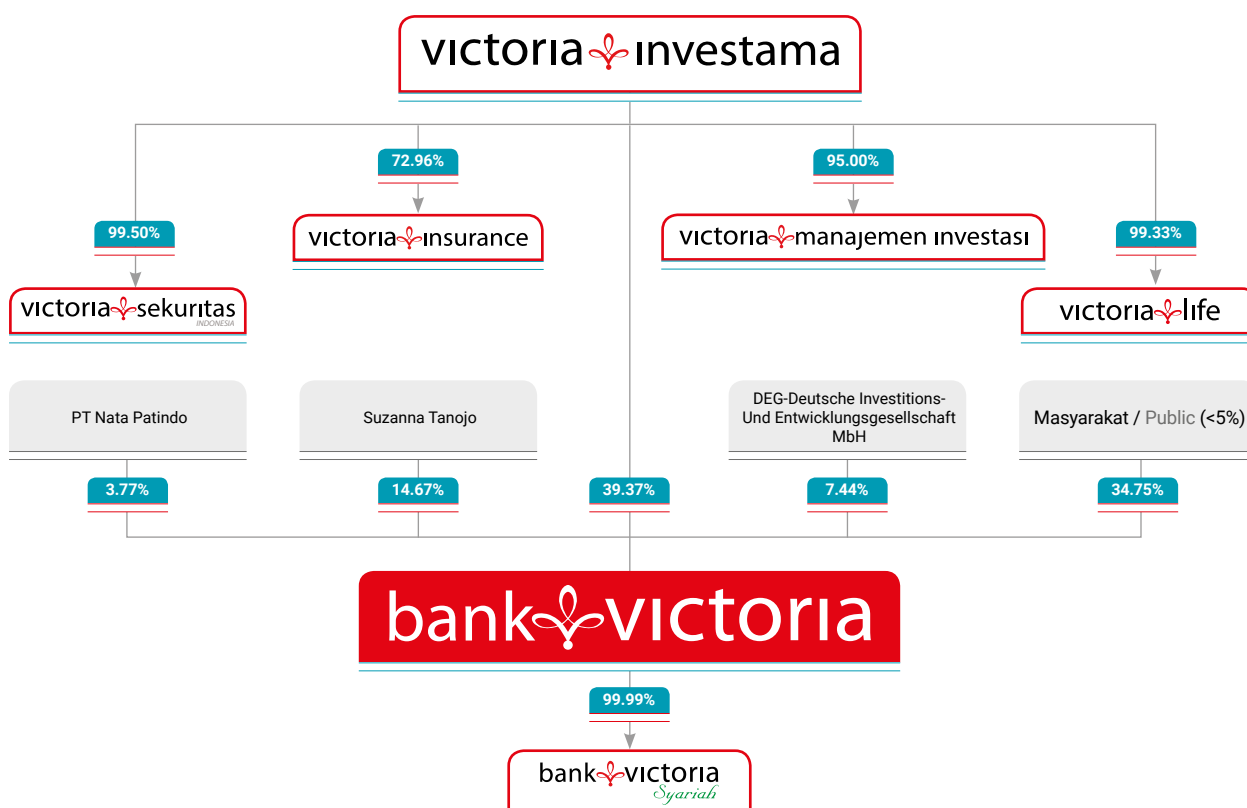
Uraian Description	Total (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Terbit Issuance Dates	Tanggal Jatuh Tempo Maturity Dates	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat suku bunga tetap Seri B Bank Victoria Series B Continuous Bond I Phase II of 2018 at fixed interest rate	200,000	5	10.30	5 Juni 2018 5 June 2018	5 Juni 2023 5 June 2023	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat suku bunga tetap Bank Victoria Continuous Subordinated Bond I Phase II of 2018 at fixed interest rate	350,000	7	11.00	5 Juni 2018 5 June 2018	5 Juni 2025 5 June 2025	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid
Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 Bank Victoria Continuing Bonds II Phase I Year 2019	100,000	2	9.75	28 Juni 2019 28 June 2019	28 Juni 2021 28 June 2021	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	idA- (Single A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO) idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO)	Lunas Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 Bank Victoria Continuing Subordination Bonds II Phase I Year 2019	250,000	7	11.75	28 Juni 2019 28 June 2019	28 Juni 2026 28 June 2026	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 Bank Victoria Continuing Subordination Bonds II Phase II Year 2019	150,000	7	11.25	8 November 2019	8 November 2026	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid

Uraian Description	Total (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Terbit Issuance Dates	Tanggal Jatuh Tempo Maturity Dates	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 Bank Victoria Continuing Subordination Bonds II Phase III Year 2020	60,000	7	11.25	1 April 2020	1 April 2027	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	idBBB (Triple B) dari PT Pemeringkat Efek Indonesia (PEFINDO) idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO)	Belum Lunas Not Paid

**Catatan / Notes:**

- Peringkat terakhir Obligasi Bank Victoria I Tahun 2000 dengan tingkat bunga tetap Seri A dan Obligasi Bank Victoria I Tahun 2000 dengan tingkat bunga mengambang Seri B adalah per Maret 2007;
  - Peringkat terakhir Obligasi Bank Victoria II Tahun 2007 dengan tingkat bunga tetap dan Obligasi Subordinasi I Bank Victoria Tahun 2007 dengan tingkat bunga tetap adalah per Maret 2012; dan
  - Peringkat terakhir Obligasi Bank Victoria IV Tahun 2013 dengan tingkat bunga tetap adalah per April 2018.
- The latest rating of Bank Victoria Series A Bond I of 2000 at fixed interest rate and Bank Victoria Bond I Series B of 2000 at floating interest rate was per March 2007;
  - The latest rating of Bank Victoria Bond II of 2007 at fixed interest rate and Bank Victoria Subordinated Bond I of 2007 at fixed interest rate was per March 2012; and
  - The latest rating of Bank Victoria Bond IV of 2013 at fixed interest rate was per April 2018.

## Struktur Grup Group Structure



Bank Victoria tidak memiliki entitas asosiasi, perusahaan joint venture, dan special purpose vehicle (SPV).

Bank Victoria did not have Associate Entity, joint venture company, and special purpose vehicle (SPV).



## Entitas Anak Subsidiaries

**Bank Victoria memiliki 1 (satu) Entitas Anak, yaitu Bank Victoria Syariah, yang dijelaskan sebagai berikut.**

Bank Victoria has 1 (one) Subsidiary, namely Bank Victoria Syariah, which is explained as follows.



### Bank Victoria Syariah

Gedung Graha BIP Lt. 5 / Graha BIP Building, 5<sup>th</sup> floor  
Jl. Gatot Subroto Kav. 23  
Kel. Karet Semanggi, Kec. Setiabudi  
Jakarta Selatan, 12930

T : (021) 5600 467  
(021) 5225 285 (*Hunting*)  
F : (021) 5664 247  
E : corsec@bankvictoriasyariah.co.id  
W : www.bankvictoriasyariah.co.id

	<b>Bidang Usaha</b> Line of Business	Perbankan Syariah Sharia Banking
	<b>Tahun Beroperasi</b> Year of Operations	Beroperasi sejak 1966 Has been in operation since 1966
	<b>Tanggal Pendirian</b> Date of Incorporation	15 April 1966
	<b>Total Aset (dalam juta)</b> Total Assets (in million)	Rp1,660,849
	<b>Kepemilikan Saham</b> Share Ownership	99.99%

### Media Sosial / Social Media



PT. Bank Victoria Syariah



@victoriasyariah



Bank Victoria Syariah

### Susunan Pengurus Management Structure

Jabatan	Nama Name	Position
<b>Dewan Komisaris / Board of Commissioners</b>		
Komisaris Utama/Independen	Achmad Friscantono	President Commissioner/Independent
Komisaris	Sari Idayanti	Commissioner
Komisaris Independen	Retno Dwijanti Widaningsih	Independent Commissioner

Jabatan	Nama Name	Position
<b>Direksi / Board of Directors</b>		
Direktur Utama	Sugiharto	President Director
Direktur Bisnis	Andy Sundoro	Director of Business
Direktur Operasional (merangkap jabatan sebagai Direktur Kepatuhan dan Manajemen Risiko)	Deddy Effendi Ridwan	Operational Director (concurrently Director of Compliance and Risk Management)
<b>Dewan Pengawas Syariah / Sharia Supervisory Board</b>		
Ketua	Prof. Dr. K.H. Hassanuddin AF, MA	Chairman
Anggota	Prof. Dr. Hj. Huzaemah Tahido Yonggo*	Member

\* Telah meninggal dunia pada 23 Juli 2021. / Passed away on 23 July 2021.

## Riwayat Singkat PT Bank Victoria Syariah

PT Bank Victoria Syariah didirikan dengan nama PT Bank Swaguna berdasarkan Akta No. 9 tanggal 15 April 1966 yang dibuat di hadapan Notaris Bebas Daeng Lalo. Akta tersebut telah memperoleh pengesahan dari Menteri Hukum dan Hak Asasi Manusia berdasarkan Surat Keputusan No. JA.5/79/5 tanggal 7 November 1967, serta telah didaftarkan pada Daftar Perusahaan di Kantor Panitera Pengadilan Negeri I di Cirebon masing-masing di bawah No. 1/1968 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 42 tanggal 24 Mei 1968, Tambahan No. 62.

Pada tahun 2007, Bank Victoria mengakuisisi 99,80% saham Bank Swaguna, sebagaimana dicatat dalam Akta No. 15 tanggal 7 September 2007 yang dibuat di hadapan Notaris Veronika Lily Darma SH. Bank kemudian melakukan penambahan modal kepada Bank Swaguna pada tanggal 13 Desember 2017 sehingga kepemilikan saham Bank menjadi 99,98%.

Selanjutnya, sesuai dengan Surat Keputusan Pemegang Saham No. 5 tanggal 6 Agustus 2009 yang dibuat di hadapan Notaris Erni Rohaini SH, MBA, Bank Swaguna berubah nama menjadi PT Bank Victoria Syariah. Perubahan tersebut telah mendapat persetujuan dari Menteri Hukum dan Hak Asasi Manusia berdasarkan Surat Keputusan No. AHU-02731.AH.01.02.Tahun 2010 tanggal 19 Januari 2010, serta telah diumumkan dalam Berita Negara Republik Indonesia No. 83 tanggal 15 Oktober 2010, Tambahan No. 31425. Bank Victoria Syariah juga telah memperoleh izin dari Bank Indonesia dalam melakukan perubahan kegiatan usaha dari sebelumnya bank umum konvensional menjadi bank umum syariah berdasarkan Keputusan Gubernur Bank Indonesia No. 12/8/KEP.GBI/DpG/2010 tanggal 10 Februari 2010. Bank Victoria Syariah mulai beroperasi dengan prinsip-prinsip syariah tanggal 1 April 2010.

## Brief History of PT Bank Victoria Syariah

PT Bank Victoria Syariah was incorporated under the name PT Bank Swaguna based on Deed No. 9 dated 15 April 1966, made before Notary Bebas Daeng Lalo. The Deed has obtained ratification from the Minister of Law and Human Rights based on the Decree No. JA.5/79/5 dated 7 November 1967, and has been registered at the Company Register at the Clerk Office of District Court I in Cirebon, respectively under No. 1/1968 and has been announced in the Official Gazette of the Republic of Indonesia No. 42 dated 24 May 1968, Supplement No. 62.

In 2007, Bank Victoria acquired 99.80% shares of Bank Swaguna, as recorded in Deed No. 15 dated 7 September 2007, made before Notary Veronika Lily Darma SH. The Bank subsequently added capital to Bank Swaguna on 13 December 2017, and thus, the Bank's share ownership became 99.98%.

Furthermore, in accordance with Shareholders Resolutions No. 5 dated 6 August 2009 made before Notary Erni Rohaini SH, MBA, Bank Swaguna changed its name to PT Bank Victoria Syariah. The amendment has obtained ratification from the Minister of Law and Human Rights based on the Decree No. AHU-02731.AH.01.02.Tahun 2010 dated 19 January 2010, and has been announced in the Official Gazette of the Republic of Indonesia No. 83 dated 15 October 2010, Supplement No. 31425. Bank Victoria Syariah has also obtained license from Bank Indonesia to change its business activities from conventional commercial bank to sharia commercial bank based on the Decree of Governor of Bank Indonesia No. 12/8/KEP.GBI/DpG/2010 dated 10 February 2010. Bank Victoria Syariah started its operations under sharia principles on 1 April 2010.

## Produk Bank Victoria Syariah Products of Bank Victoria Syariah



### Pendanaan Funding

#### Giro iB – Wadiah

Rekening Giro untuk nasabah perorangan maupun badan hukum yang memiliki fasilitas cek dan bilyet giro.

#### Giro ViS Prima iB

Giro yang diperuntukkan untuk segmen perusahaan dengan akad *mudharabah* yang mendapat bagi hasil *tearing* sesuai dengan saldo harian nasabah.

#### Tabungan Visya iB

Simpanan dalam bentuk investasi syariah dengan prinsip bagi hasil yang saling menguntungkan.

#### Tabungan V-Plan iB

Simpanan dengan prinsip *mudharabah* yang penarikannya memiliki jangka waktu sesuai kesepakatan dengan nasabah.

#### Tabungan V-Bisnis iB

Jenis Tabungan dengan prinsip *mudharabah* yang diperuntukkan bagi nasabah perorangan dan perusahaan yang mendapatkan bagi hasil setara deposito.

#### Tabungan ViS Payroll iB

Tabungan yang menggunakan akad *mudharabah* yang diperuntukkan untuk pembayaran *payroll* ke karyawan.

#### Tabungan ViS Berhadiah iB

Tabungan yang diperuntukkan bagi perorangan dan perusahaan yang mendapat hadiah diawal sesuai keinginan nasabah dengan penempatan nominal dana tertentu dan jangka waktu tertentu (1, 3, 6, 12 bulan).

#### Tabungan Sempel iB

Tabungan untuk pelajar dengan persyaratan mudah dan fitur yang menarik dalam rangka edukasi perbankan untuk mendorong budaya menabung sejak dini.

#### Giro iB – Wadiah

Demand Deposit account for individual customers and legal entities that have checking and crossed checks facilities.

#### Giro ViS Prima iB

Demand Deposit that is intended for corporate segments with *mudharabah* agreement that receives tearing profit sharing in accordance with the customer's daily balance.

#### Visya iB Savings

Savings in the form of sharia investment under the principle of mutually beneficial profit sharing.

#### V-Plan iB Savings

Savings under the principle of *mudharabah* in which the withdrawal has a time period as agreed by the customers.

#### V-Bisnis iB Savings

A type of Savings under the principle of *mudharabah* for individual and corporate customers that will receive profit sharing equal to that of time deposits.

#### ViS Payroll iB

Savings Savings under the principle of *mudharabah* agreement, which is intended for payroll payment to the employees.

#### ViS With iB Prize Savings

Savings for individual and corporate who will receive prize in the beginning in accordance with the customer's needs by placing certain amount of fund in a certain period of time (1, 3, 6, 12 months).

#### Sempel iB Savings

Savings for students with simple requirements and interesting features in the framework of banking education to encourage savings culture early.



## Pembiayaan Financing

### UKM ViS iB

Pembiayaan untuk investasi usaha/pembiayaan modal kerja (pembiayaan kas, piutang usaha, maupun persediaan) dengan pengembalian sesuai dengan akad pembiayaan yang disepakati antara Bank dan pelaku usaha UKM.

### KPM ViS iB

Fasilitas pembiayaan kepemilikan mobil untuk keperluan konsumtif yang diberikan kepada nasabah perorangan dengan akad *murabahah* dimana Bank Victoria Syariah menjual mobil kepada nasabah sebesar harga pokok ditambah margin yang disepakati.

### KMG ViS iB

Produk pembiayaan kepemilikan barang multiguna untuk kebutuhan konsumtif yang diberikan kepada nasabah perorangan dengan akad *murabahah* dimana Bank Victoria Syariah menjual barang/benda kepada nasabah sebesar harga pokok ditambah dengan margin keuntungan yang disepakati.

### KPR ViS iB

Fasilitas pembiayaan kepemilikan rumah untuk keperluan konsumtif yang diberikan kepada nasabah perorangan dengan akad *murabahah* dimana Bank Victoria Syariah membiayai pembelian rumah kepada nasabah sebesar harga pokok ditambah margin yang disepakati.

### Komersial BViS iB

Pembiayaan produktif untuk usaha komersial dengan menggunakan akad jual beli dan bagi hasil dan sesuai dengan syarat dan ketentuan yang berlaku.

### ViS iB SME

Financing for business investment/working capital (financing of cash, trade receivables, or inventories) with returns in accordance with the financing agreement made between the Bank and the SME business actors.

### ViS iB KPM (Car Ownership Program)

Financing facility for car ownership for consumptive purpose given to individual customer by *murabahah* agreement where Bank Victoria Syariah sells car to customer at principal cost plus the agreed margin.

### ViS iB Multipurpose

Financing product for multipurpose goods ownership for consumptive purpose given to individual customer by *murabahah* agreement where Bank Victoria Syariah sells goods/objects to customer at principal cost plus the agreed profit margin.

### ViS iB KPR (Home Ownership Program)

Financing facility for home ownership for consumptive purpose given to individual customer by *murabahah* agreement where Bank Victoria Syariah finance a house purchase to customer at principal cost plus the agreed margin.

### BViS iB Commercial

Productive financing for commercial business by using the sale and purchase agreement and profit sharing in accordance with the applicable terms and conditions.

## Lembaga dan Profesi Penunjang Pasar Modal

### Capital Market Supporting Institutions









#### Wali Amanat Trustee

 <b>Nama Lembaga</b> Institution Name	<b>PT Bank Mega Tbk</b>
 <b>Biaya</b> Fee	Rp594,000,000,-
 <b>Alamat</b> Address	Menara Bank Mega Jl. Kapten Tendean No. 12-12A Jakarta, 12970 T : (021) 7917 5000 F : (021) 7918 7100 W : www.bankmega.com
 <b>No. STTD</b> Registration Certificate No.	20/STTD-WA/PM/2000 tanggal 2 Oktober 2000. 20/STTD-WA/PM/2000 dated 2 October 2000.
 <b>Keanggotaan Asosiasi</b> Association Membership	Asosiasi Wali Amanat Indonesia (AWAI) sesuai Surat Keterangan AWAI No. AWAI/06/2008 tanggal 17 Desember 2008. Indonesian Association of Trustees (AWAI) in accordance to AWAI Certificate No. AWAI/06/2008 dated 17 December 2008.
 <b>Pedoman Kerja</b> Work Guidelines	Peraturan Otoritas Jasa Keuangan. Financial Services Authority Regulations.
 <b>Jasa yang Diberikan</b> Services Provided	Jasa tahunan wali amanat atas obligasi dan obligasi subordinasi Bank. Annual trustee service on the Bank's bonds and subordinated bonds.








#### Pencatatan Efek Securities Listing

 <b>Nama Lembaga</b> Institution Name	<b>Bursa Efek Indonesia</b> Indonesia Stock Exchange
 <b>Biaya</b> Fee	Rp185,900,000,-
 <b>Alamat</b> Address	Indonesia Stock Exchange Building Tower I Jl. Jenderal Sudirman Kav. 52-53 Jakarta Selatan, 12190 T : (021) 5150 515 F : (021) 5150 330 W : www.idx.co.id
 <b>Pedoman Kerja</b> Work Guidelines	Undang-Undang Pasar Modal dan Peraturan Otoritas Jasa Keuangan. Capital Market Laws and Financial Services Authority Regulations.
 <b>Jasa yang Diberikan</b> Services Provided	Pencatatan efek dalam rangka Penambahan Modal Tanpa HMETD berdasarkan Surat No. S-No. 03264/BEI.PP2/05-2021 tanggal 4 Mei 2021 dan No. S-09246/BEI.PP2/12-2021 tanggal 8 Desember 2021. Securities listing for the purpose of Capital Increase without Pre-emptive Rights based on Letter No. S-No. 03264/BEI.PP2/05-2021 dated 4 May 2021 and No. S-09246/BEI.PP2/12-2021 dated 8 December 2021.

### Notaris Notary

	<b>Nama Lembaga</b> Institution Name	Fathiah Helmi, SH
	<b>Biaya</b> Fee	Rp77,000,000,-
	<b>Nama Notaris</b> Notary Name	Fathiah Helmy, SH
	<b>Alamat</b> Address	Graha Irama Lt. 6C Jl. HR Rasuna Said Kav. 1 – 2 Jakarta, 12950 T : (021) 5290 7304 (021) 5290 7305 (021) 5290 7306 F : (021) 526 1136 E : fhchozie@gmail.com
	<b>No. STTD</b> Registration Certificate No.	02/STTD-N/PM/1996 tanggal 12 Februari 1996. 02/STTD-N/PM/1996 dated 12 February 1996.
	<b>Keanggotaan Asosiasi</b> Association Membership	Ikatan Notaris Indonesia (INI) No. 011.003.027.260958. Indonesian Notary Association (INI) No. 011.003.027.260958.
	<b>Pedoman Kerja</b> Work Guidelines	Pernyataan Undang-Undang No. 30 Tahun 2004 tentang Jabatan Notaris dan Kode Etik Ikatan Notaris Indonesia. Statement of Law No. 30 of 2004 on Position of Notary and Code of Ethics of Indonesian Notary Association.
	<b>Jasa yang Diberikan</b> Services Provided	Pembuatan Akta dalam rangka PMTHMETD Bank Victoria. Preparation of Deed for PMTHMETD of Bank Victoria.

### Perusahaan Pemeringkat Efek Securities Rating Agency








	<b>Nama Lembaga</b> Institution Name	PT Pemeringkat Efek Indonesia
	<b>Biaya</b> Fee	Rp192,500,000,-
	<b>Alamat</b> Address	Equity Tower 30 <sup>th</sup> floor Sudirman Central Business District Lot. 9 Jl. Jenderal Sudirman Kav. 52-53 Jakarta, 12190 T : (021) 5096 8469 F : (021) 5096 8468 W : www.pefindo.com
	<b>No. STTD</b> Registration Certificate No.	KEP-39/PM-PI/1994 tanggal 13 Agustus 1994. KEP-39/PM-PI/1994 dated 13 August 1994.
	<b>Keanggotaan Asosiasi</b> Association Membership	Association of Credit Rating Agency in Asia (ACRAA). Association of Credit Rating Agency in Asia (ACRAA).
	<b>Pedoman Kerja</b> Work Guidelines	Metodologi Pemeringkatan PT Pemeringkat Efek Indonesia (PEFINDO). Rating Methodology of PT Pemeringkat Efek Indonesia (PEFINDO).
	<b>Jasa yang Diberikan</b> Services Provided	Pemeringkatan Tahunan Perusahaan, Obligasi, dan Obligasi Subordinasi Bank Victoria. Bank Victoria's Annual Rating of the Company, Bonds, and Subordinated Bonds.



**Akuntan Publik**  
Public Accountant

	<b>Nama Lembaga</b> Institution Name	Purwanto, Sungkoro & Surja ( <i>member of Ernst &amp; Young</i> )
	<b>Biaya</b> Fee	Rp1,550,000,000
	<b>Nama Akuntan</b> Accountant Name	Yovita
	<b>Alamat</b> Address	Gedung Indonesia Stock Exchange Tower 2 Lt. 7 Jl. Jenderal Sudirman Kav. 52-53 Jakarta, 12190 T : (021) 5289 5000 F : (021) 5289 4100
	<b>No. STTD</b> Registration Certificate No.	STTD.KAP-03/PM.22/2018
	<b>Keanggotaan Asosiasi</b> Association Membership	Ikatan Akuntan Indonesia (IAI) Institute of Indonesia Chartered Accountants
	<b>Pedoman Kerja</b> Work Guidelines	Pernyataan Standar Akuntansi Keuangan (PSAK) dan Standar Profesional Akuntan Publik (SPAP). Statement of Financial Accounting Standards (PSAK) and Professional Standards of Public Accountants (SPAP).
	<b>Jasa yang Diberikan</b> Services Provided	Audit Laporan Keuangan tahun buku 2021 berdasarkan Surat Perikatan No. Ref: 0076/PSS/10/2021. Audit of Financial Statements for 2021 fiscal year based on Engagement Letter No. Ref: 0076/PSS/10/2021.

**Biro Administrasi Efek**  
Share Registrar Bureau

	<b>Nama Lembaga</b> Institution Name	PT Adimitra Jasa Korpora
	<b>Biaya</b> Fee	Rp60,000,000,-
	<b>Alamat</b> Address	Rukan Kirana Boutiqe Office Jl. Kirana Avenue III Blok F3 No. 5 Kelapa Gading, Jakarta Utara, 14250 Jakarta Utara, 14250 T : (021) 29745222 F : (021) 29289961 E : opr@adimitra-jk.co.id W : www.adimitrajk.co.id
	<b>No. STTD</b> Registration Certificate No.	Keputusan Otoritas Jasa Keuangan No. KEP-41/D.04/2014 tanggal 19 September 2014. Decree of Financial Services Authority No. KEP-41/D.04/2014 dated 19 September 2014.
	<b>Keanggotaan Asosiasi</b> Association Membership	Biro Administrasi Efek Indonesia No. ABI/11/2015-012. Indonesia Share Registrar Bureau No. ABI/11/2015-012.
	<b>Pedoman Kerja</b> Work Guidelines	Peraturan Otoritas Jasa Keuangan. Financial Services Authority Regulations.
	<b>Jasa yang Diberikan</b> Services Provided	Jasa Administrasi Penerbitan Saham Baru dalam Penambahan Modal Tanpa Memberikan Hak Memesan Efek Terlebih Dahulu berdasarkan Surat No. PW-106/BVIC/122021. New Share Issuance Administration Services for Capital Increase Without Pre-emptive Rights Based on Letter No. PW-106/BVIC/122021.

# Alamat Perusahaan Bank Victoria dan Entitas Anak

## Address of Bank Victoria and Subsidiary

### Alamat Perusahaan Bank Victoria

#### Address of Bank Victoria



#### PT Bank Victoria International Tbk

**Gedung Graha BIP Lt. 10**  
Graha BIP Building 10<sup>th</sup> Floor  
Jl. Gatot Subroto Kav. 23  
Jakarta Selatan, 12930

T : (021) 5228 888  
F : (021) 5228 777  
E : corsec@victoriabank.co.id  
W : www.victoriabank.co.id

#### Kantor Cabang / Branch Offices

<b>KC Senayan</b> Gedung Bank Panin Senayan Lt. Dasar Jl. Jenderal Sudirman No. 1 Kel. Gelora, Jakarta Selatan, 12710 T : (021) 5735 425 F : (021) 5735 429	<b>KC Cideng</b> Jl. Cideng Timur No. 33 Kel. Petojo Utara, Kec. Gambir Jakarta Pusat, 10130 T : (021) 6338 913 F : (021) 6338 914	<b>KC Fatmawati</b> Jl. RS Fatmawati No. 85A RT 006 RW 005, Cipete Utara, Kebayoran Baru Jakarta Selatan, 12150 T : (021) 7201 496 F : (021) 7201 497
<b>KC Kelapa Gading 1</b> Jl. Taman Mandiri I No. 8 Kav A1-B1 Kelapa Gading Timur, Jakarta Utara, 14240 T : (021) 4514 012 F : (021) 4514 013	<b>KC Bogor</b> Jl. Pakuan No. 8 Kel. Baranangsiang, Kec. Bogor Timur Bogor, Jawa Barat, 16143 T : (0251) 8343 800 (Hunting) (0251) 8343 804 (0251) 8343 806 (0251) 8343 805 (Direct) F : (0251) 8343 807	<b>KC Surabaya</b> Jl. Raya Darmo No. 173 Kel. Darmo, Kec. Wonokromo Kotamadya Surabaya, 60241 T : (031) 5670 778 (Hunting) F : (031) 5670 775
<b>KC Bandung</b> Jl. Braga No. 16 Kel. Braga, Kec. Sumur Bandung Bandung, Jawa Barat, 40111 T : (022) 4266 846 F : (022) 4266 845	<b>KC Manado</b> Jl. Walter Monginsidi Komplek Ruko Bahu Mall Blok E No. 5 Kel. Bahu, Kec. Malalayang Manado, Sulawesi Utara, 95115 T : (0431) 831 431 F : (0431) 831 427	<b>KC Bali</b> Jl. Raya Imam Bonjol No. 117 Dusun BR. Tenten Bali, 80114 T : (0361) 8451 000 F : (0361) 8451 010
<b>KC Semarang</b> Jl. Raya Pemuda No. 108 Kel. Kembang Sari, Kec. Semarang Tengah Jawa Tengah, 50139 T : (024) 3587 048 F : (024) 3587 049	<b>KC Makassar</b> Ruko Poros Boulevard/Ruko Emerald No. 16 Jl. Boulevard Masale Kel. Masale, Kec. Panakukang Makassar, Sulawesi Selatan T : (0411) 4093 171 F : (0411) 4093 262	<b>KC Solo</b> Jl. Brigjen Slamet Riyadi No. 424 Kel. Purwosari, Kec. Laweyan Surakarta, Jawa Tengah T : (0271) 722 243 F : (0271) 713 576
<b>KC BIP</b> Gedung Graha BIP Lt. Dasar Jl. Gatot Subroto Kav. 23 Jakarta Selatan, 12930 T : (021) 5258 208 F : (021) 5258 028	<b>KC Medan</b> Jl. Zainal Arifin No. 53C Kel. Madras Hulu, Kec. Medan Polonia Medan, Sumatra Utara, 20153 T : (061) 8051 0979 F : (061) 4576 274	
<b>Kantor Cabang Pembantu / Sub-Branch Offices</b>		
<b>KCP BSD</b> Bumi Serpong Damai Sektor IV Blok RE No. 52 Kel. Lengkong Wetan, Kec. Serpong Tangerang T : (021) 5315 2783 F : (021) 5315 2785	<b>KCP Cikini</b> Hotel Ibis Budget Unit GF. 06 Jl. Cikini Raya No. 75 Menteng, Jakarta Pusat, 10330 T : (021) 3145 223 (021) 3145 2210 F : (021) 3145 22	<b>KCP Citra Dua</b> Rukan Citra Niaga Blok A/5 Kel. Pegadungan, Kec. Kalideres Jakarta Barat, 11830 T : (021) 5437 6656 F : (021) 5437 6695
<b>KCP Duta Mas</b> Komplek Perumahan Taman Duta Mas Blok D8 No. 12 Kel. Wijaya Kusuma, Kec. Grogol Petamburan Jakarta Barat, 11460 T : (021) 5697 9990 F : (021) 5697 9996	<b>KCP Green Garden</b> Komplek Green Garden Blok A 14 No. 28 Jl. Panjang Kedoya Utara Kel. Kedoya Utara, Kec. Kebon Jeruk Jakarta Barat, 11520 T : (021) 5835 6803 F : (021) 5835 6844	<b>KCP Kebon Jeruk</b> Komplek Pertokoan Intercon Blok B No. 4-5 Jl. Meruya Ilir Raya Kel. Srengseng, Kec. Kembangan Jakarta Barat, 11620 T : (021) 5874 427 F : (021) 5842 379

**Kantor Cabang Pembantu / Sub-Branch Offices**

<p><b>KCP Kelapa Gading Boulevard</b> Komplek Ruko Kelapa Gading Blok LC-6 No. 14 Jl. Raya Boulevard Barat Kel. Kelapa Gading Barat, Kec. Kelapa Gading Jakarta Utara, 14240 T : (021) 4507 672 F : (021) 4528 854</p>	<p><b>KCP Kemang</b> Jl. Kemang Raya No. 82 C Kel. Bangka, Kec. Mampang Prapatan Jakarta Selatan, 12730 T : (021) 7193 521 F : (021) 7193 721</p>	<p><b>KCP Gading Serpong</b> Ruko Rodeo Drive Blok B No. 6 Jl. Boulevard Gading Serpong Kel. Pakulonan Barat, Kec. Kelapa Dua Tangerang, 15333 T : (021) 5421 7245 F : (021) 5421 7247</p>
<p><b>KCP Patal Senayan</b> Rukan Permata Senayan Blok B No. 6 Jl. Tentara Pelajar Kel. Grogol Utara, Kec. Kebayoran Lama Jakarta Selatan, 12210 T : (021) 5794 0668 F : (021) 5794 0667</p>	<p><b>KCP Pecenongan</b> Jl. Pecenongan Raya No. 26 Kel. Kebon Kelapa, Kec. Gambir Jakarta Pusat, 10120 T : (021) 386 5627 F : (021) 386 5637</p>	<p><b>KCP Pantai Indah Kapuk</b> Bukit Golf Mediterania Blok B/18 Pantai Indah Kapuk Kel. Kamal Muara, Kec. Penjarangan Jakarta Utara, 14460 T : (021) 5694 5973 F : (021) 5694 5974</p>
<p><b>KCP Pondok Indah</b> Plaza Pondok Indah Blok II Blok UPS No. 51 Jl. Metro Pondok Indah Kel. Pondok Pinang, Kec. Kebayoran Lama Jakarta Selatan, 12310 T : (021) 7591 5628 F : (021) 7591 5625</p>	<p><b>KCP Puri Indah</b> Komplek Puri Indah Blok A No. 3 Jl. Puri Indah Raya Kel. Kembangan Selatan, Kec. Kembangan Jakarta Barat, 11610 T : (021) 582 0216 F : (021) 582 0217</p>	<p><b>KCP Senayan City</b> Mall Senayan City unit 6-11 Jl. Asia Afrika Lot 19 Kel. Gelora Senayan, Kec. Tanah Abang Jakarta Pusat, 10270 T : (021) 7278 1749 F : (021) 7278 1750</p>
<p><b>KCP Sunter</b> Komplek Rukan Sunter Permai Blok A-9 Jl. Danau Sunter Utara Kel. Sunter Agung, Kec. Tanjung Priok Jakarta Utara, 14350 T : (021) 6530 7347 F : (021) 6530 7348</p>	<p><b>KCP Taman Palem Lestari</b> Ruko Taman Palem Blok D1 No. 19D Kel. Cengkareng Barat, Kec. Cengkareng Jakarta Barat, 11730 T : (021) 5596 0771 F : (021) 5596 0772</p>	<p><b>KCP Wisma Slipi</b> Wisma Slipi Lt. Dasar Jl. Letnan Jenderal S Parman Kav 12 Kel. Kemanggisan, Kec. Palmerah Jakarta Barat, 11480 T : (021) 5308 800 F : (021) 5307 207</p>
<p><b>KCP Grand Wijaya</b> Komplek Grand Wijaya Blok C No. 10 Jl. Wijaya II Kel. Pulo, Kec. Kebayoran Baru Jakarta Selatan, 12160 T : (021) 7200 009 F : (021) 7202 878</p>	<p><b>KCP Central Park</b> Garden Shopping Arcade B/08/BG Jl. Tanjung Duren Raya Kav. 5-9 Tanjung Duren, Jakarta Barat, 11470 T : (021) 2920 6257 F : (021) 2920 6258</p>	<p><b>KCP Wisma Indocement</b> Wisma Indocement Lt. Dasar Jl. Jenderal Sudirman Kav 70-71 Kel. Setibudi, Kec. Setiabudi Jakarta Selatan, 12970 T : (021) 5223 765 F : (021) 5223 762</p>
<p><b>KCP Duta Merlin</b> Komplek Pertokoan Duta Merlin Blok A No. 10 Jl. Gajah Mada No. 3-5 Kel. Petojo Utara, Kec. Gambir Jakarta Pusat, 10160 T : (021) 6386 5970 F : (021) 6386 5971</p>	<p><b>KCP Tomang</b> Lobby Gedung Mandala Airlines Jl. Tomang Raya No. 33-37 Kel. Tomang, Kec. Grogol Petamburan Jakarta Barat, 11440 T : (021) 5697 2227 F : (021) 5697 2237</p>	<p><b>KCP Muara Karang 2</b> Jl. Pluit Karang Utara No. 46 Blok I1 Selatan Kav. 48 Penjarangan Jakarta Utara, 14450 T : (021) 6604 144 F : (021) 6604 116</p>
<p><b>KCP Tanah Abang Blok B</b> Jl. KH Fachrudin Pertokoan Grosir Mall Tanah Abang Blok B Lt. 5 Loss Ktr No. 2 Kel. Kampung Bali, Kec. Tanah Abang Jakarta Pusat, 10240 T : (021) 831 431 F : (021) 831 427</p>		

**Alamat Entitas Anak**  
Address of Subsidiary

	<p><b>Bank Victoria Syariah</b> Gedung Graha BIP Lt. 5 Jl. Gatot Subroto Kav. 23 Jakarta Selatan, 12930</p>	<p>T : (021) 5600 467 (021) 5225 285 (Hunting) F : (021) 5664 247 E : corsec@bankvictoriasyariah.co.id W : www.bankvictoriasyariah.co.id</p>
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**Kantor Cabang / Branch Offices**

**Kantor Cabang Pembantu / Sub-Branch Offices**

<p><b>KC Jakarta (Utama/Main)</b> Gedung The Victoria Lt. 1 Jl. Tomang Raya Kav. 35-37 Jakarta Barat, 11440 T : (021) 5600 468 F : (021) 2920 0630</p>	<p><b>KC Bandung</b> Jl. Gatot Soebroto No. 3 Bandung, Jawa Barat T : (022) 8734 0303 F : (022) 8734 0311</p>	<p><b>KC Bekasi</b> Bekasi Square No. 63 Jl. A. Yani Pekayon, Bekasi T : (021) 8243 4874 (021) 8243 4875 F : (021) 8243 4876</p>	<p><b>KC Solo</b> Honggowongso Square Blok A/7 Jl. Honggowongso Solo, Jawa Tengah, 57152 T : (0271) 660 832 F : (0271) 660 932</p>	<p><b>KCP Tangerang</b> Modern Land Blok AR/23 Jl. Jenderal Sudirman Cikokol, Tangerang, Banten, 15118 T : (021) 5574 7698 F : (021) 5574 7699</p>
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## Akses Informasi Access to Information

Bank Victoria telah menyediakan akses informasi yang dapat digunakan seluruh pemangku kepentingan untuk memperoleh informasi melalui:

Bank Victoria has provided access to information that can be used by all stakeholders to obtain Company information through:

### CAPRIE ARDIRA AZHAR

**Kepala Divisi Corporate Secretary**  
Head of Corporate Secretary Division



[corsec@victoriabank.co.id](mailto:corsec@victoriabank.co.id)



T : (021) 5228 888  
F : (021) 5228 777



[www.victoriabank.co.id](http://www.victoriabank.co.id)

## Informasi pada Situs Web Perusahaan Information on Company Website

Bank Victoria berkomitmen untuk terus meningkatkan penerapan prinsip keterbukaan serta meningkatkan pelaksanaan tata kelola perusahaan yang baik (*good corporate governance*) khususnya kepada Pemegang Saham, nasabah, masyarakat, pemerintah, dan pemangku kepentingan lainnya melalui penyajian informasi pada situs web [www.victoriabank.co.id](http://www.victoriabank.co.id). Berikut adalah tampilan utama situs web Bank Victoria.

Bank Victoria is committed to keep improving the implementation of transparency principle and the implementation of good corporate governance, especially to Shareholders, customers, the public, the government, and other stakeholders through the presentation of information on the website [www.victoriabank.co.id](http://www.victoriabank.co.id). Below is the main appearance of Bank Victoria website.

## Garis Besar Informasi pada Situs Web Outline of Information on the Website

**Informasi Pemegang Saham  
sampai dengan pemilik akhir  
individu**

Shareholders information  
up to the ultimate individual  
owner



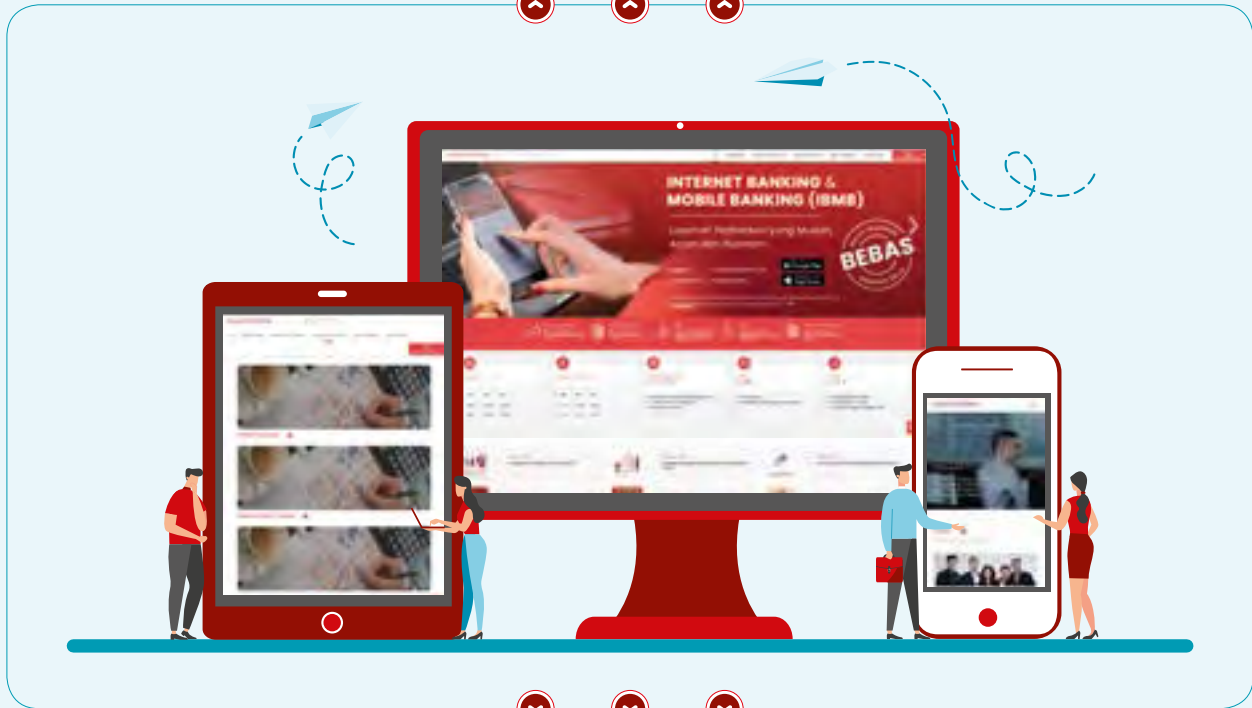
**Piagam Dewan Komisaris,  
Direksi, Komite-Komite, dan  
Unit Audit Internal**

Manual and Charter of the  
Board of Commissioners,  
Board of Directors, Committees,  
and Internal Audit Unit



**Laporan Keuangan Tahunan  
terpisah 5 (lima) tahun  
terakhir**

Separate Annual Financial  
Statements for the last 5 (five)  
years



**Informasi Rapat Umum  
Pemegang Saham**

Information on General  
Meeting of Shareholders



**Profil Dewan Komisaris  
dan Direksi**

Profile of Board of  
Commissioners and Board of  
Directors



**Isi Kode Etik  
Contents of Code of Conduct**



**Informasi pada Link Situs Web**  
**Information on Website Links**

<b>Informasi</b> Information	<b>Link Terkait</b> Related Links
<b>Tentang Kami / About Us</b>	
Sekilas Bank Victoria About Bank Victoria	<a href="https://www.victoriabank.co.id/page/tentang-kami/tentang-bank-victoria">https://www.victoriabank.co.id/page/tentang-kami/tentang-bank-victoria</a>
Visi dan Misi Vision and Mision	<a href="https://www.victoriabank.co.id/page/tentang-kami/visi-misi">https://www.victoriabank.co.id/page/tentang-kami/visi-misi</a>
Budaya Perusahaan Corporate Culture	<a href="https://www.victoriabank.co.id/page/tentang-kami/budaya-perusahaan">https://www.victoriabank.co.id/page/tentang-kami/budaya-perusahaan</a>
Struktur Perusahaan dan Grup Company and Group Structure	<a href="https://www.victoriabank.co.id/page/tentang-kami/struktur-perusahaan-grup">https://www.victoriabank.co.id/page/tentang-kami/struktur-perusahaan-grup</a>
Tonggak Penting Milestones	<a href="https://www.victoriabank.co.id/page/tentang-kami/tonggak-penting">https://www.victoriabank.co.id/page/tentang-kami/tonggak-penting</a>
Manajemen Management	<a href="https://www.victoriabank.co.id/page/tentang-kami/manajemen">https://www.victoriabank.co.id/page/tentang-kami/manajemen</a>
Dewan Komisaris Board of Commissioners	<a href="https://www.victoriabank.co.id/page/tentang-kami/manajemen/dewan-komisaris/">https://www.victoriabank.co.id/page/tentang-kami/manajemen/dewan-komisaris/</a>
Direksi Board of Directors	<a href="https://www.victoriabank.co.id/page/tentang-kami/manajemen/-direksi/">https://www.victoriabank.co.id/page/tentang-kami/manajemen/-direksi/</a>
Pejabat Eksekutif Executive Officer	<a href="https://www.victoriabank.co.id/page/tentang-kami/manajemen/-pejabat-eksekutif/">https://www.victoriabank.co.id/page/tentang-kami/manajemen/-pejabat-eksekutif/</a>
Sekretaris Perusahaan Corporate Secretary	<a href="https://www.victoriabank.co.id/page/tentang-kami/manajemen/-sekretaris-perusahaan/">https://www.victoriabank.co.id/page/tentang-kami/manajemen/-sekretaris-perusahaan/</a>
Whistleblower Whistleblower	<a href="https://www.victoriabank.co.id/page/tentang-kami/whistleblower">https://www.victoriabank.co.id/page/tentang-kami/whistleblower</a>
Penghargaan Award	<a href="https://www.victoriabank.co.id/page/tentang-kami/penghargaan">https://www.victoriabank.co.id/page/tentang-kami/penghargaan</a>
Tata Kelola Good Corporate Governance	<a href="https://www.victoriabank.co.id/page/tentang-kami/tata-kelola">https://www.victoriabank.co.id/page/tentang-kami/tata-kelola</a>
Komite-Komite Committees	<a href="https://www.victoriabank.co.id/page/tentang-kami/tata-kelola/komite-komite/">https://www.victoriabank.co.id/page/tentang-kami/tata-kelola/komite-komite/</a>
Kode Etik Code of Conduct	<a href="https://www.victoriabank.co.id/page/tentang-kami/tata-kelola/kode-etik/">https://www.victoriabank.co.id/page/tentang-kami/tata-kelola/kode-etik/</a>
Kebijakan Manajemen Risiko Risk Management Policy	<a href="https://www.victoriabank.co.id/page/tentang-kami/tata-kelola/kebijakan-manajemen-resiko/">https://www.victoriabank.co.id/page/tentang-kami/tata-kelola/kebijakan-manajemen-resiko/</a>
AML dan CFT AML and CFT	<a href="https://www.victoriabank.co.id/page/tentang-kami/tata-kelola/apu-ppt/">https://www.victoriabank.co.id/page/tentang-kami/tata-kelola/apu-ppt/</a>
Good Corporate Governance Good Corporate Governance Report	<a href="https://www.victoriabank.co.id/page/tentang-kami/tata-kelola/good-corporate-governance/">https://www.victoriabank.co.id/page/tentang-kami/tata-kelola/good-corporate-governance/</a>
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Investasi Investment	<a href="https://www.victoriabank.co.id/page/produk-layanan/simpanan/investasi">https://www.victoriabank.co.id/page/produk-layanan/simpanan/investasi</a>



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Pinjaman Loan	<a href="https://www.victoriabank.co.id/page/produk-layanan/pinjaman">https://www.victoriabank.co.id/page/produk-layanan/pinjaman</a>
Biaya dan Tarif Umum Costs and General Fares	<a href="https://www.victoriabank.co.id/page/produk-layanan/biaya-tarif-umum">https://www.victoriabank.co.id/page/produk-layanan/biaya-tarif-umum</a>
Layanan Services	<a href="https://www.victoriabank.co.id/page/produk-layanan/layanan">https://www.victoriabank.co.id/page/produk-layanan/layanan</a>
<i>Internet banking (IB) dan Mobile banking (MB)</i> Internet banking (IB) and Mobile banking (MB)	<a href="https://www.victoriabank.co.id/page/produk-layanan/layanan/internet-banking-(ib)-dan-mobile-banking-(mb)/">https://www.victoriabank.co.id/page/produk-layanan/layanan/internet-banking-(ib)-dan-mobile-banking-(mb)/</a>
Victoria Internet Business (VIBIZ) Victoria Internet Business (VIBIZ)	<a href="https://www.victoriabank.co.id/page/produk-layanan/layanan/victoria-internet-business-(vibiz)/">https://www.victoriabank.co.id/page/produk-layanan/layanan/victoria-internet-business-(vibiz)/</a>
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Laporan Kinerja Keuangan Tengah Tahun Mid Year Performance Financial Report	<a href="https://www.victoriabank.co.id/page/tinjauan-ekonomi/laporan-keuangan/laporan-kinerja-keuangan-tengah-tahun/">https://www.victoriabank.co.id/page/tinjauan-ekonomi/laporan-keuangan/laporan-kinerja-keuangan-tengah-tahun/</a>
Anggaran Dasar Perseroan Article of Associations	<a href="https://www.victoriabank.co.id/page/tinjauan-ekonomi/anggaran-dasar-perseroan">https://www.victoriabank.co.id/page/tinjauan-ekonomi/anggaran-dasar-perseroan</a>
Rapat Umum Pemegang Saham General Meeting Shareholders	<a href="https://www.victoriabank.co.id/page/tinjauan-ekonomi/rapat-umum-pemegang-saham">https://www.victoriabank.co.id/page/tinjauan-ekonomi/rapat-umum-pemegang-saham</a>
Tinjauan Ekonomi Economic Overview	<a href="https://www.victoriabank.co.id/page/tinjauan-ekonomi/tinjauan-ekonomi">https://www.victoriabank.co.id/page/tinjauan-ekonomi/tinjauan-ekonomi</a>
Prospektus Prospectus	<a href="https://www.victoriabank.co.id/page/tinjauan-ekonomi/prospektus">https://www.victoriabank.co.id/page/tinjauan-ekonomi/prospektus</a>
Keterbukaan Informasi Enclosure Information	<a href="https://www.victoriabank.co.id/page/tinjauan-ekonomi/keterbukaan-informasi">https://www.victoriabank.co.id/page/tinjauan-ekonomi/keterbukaan-informasi</a>
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## **Pendidikan dan/atau Pelatihan Dewan Komisaris, Direksi, Komite-Komite, Pejabat Eksekutif, Sekretaris Perusahaan, Audit Internal, dan Unit Lainnya**

### **Education and/or Training of Board of Commissioners, Board of Directors, Committees, Executive Officers, Corporate Secretary, Internal Audit, and Other Units**

Sepanjang tahun 2021, Bank Victoria telah melaksanakan pelatihan bagi jajaran pengurus Bank, baik formal maupun informal. Pelatihan tersebut bertujuan untuk meningkatkan kompetensi serta menunjang pelaksanaan tugas bagi masing-masing pengurus.

Throughout 2021, Bank Victoria held trainings for Bank management, both formal and informal. The training aims to improve competencies and support the implementation of duties for each board. Below is the description of the training that has been carried out.

## Biaya Pengembangan Kompetensi

Biaya pengembangan kompetensi yang dikeluarkan oleh Bank Victoria pada tahun 2021 diuraikan pada tabel berikut.

## Competency Development

Competency Development cost paid by Bank Victoria in 2021 is as described in below table.

Nama	Biaya Pengembangan Kompetensi Competency Development Cost (Rp)	Name
Dewan Komisaris	13,326,555	Board of Commissioners
Direksi	26,276,051	Board of Directors
Komite Pemantau Risiko	15,906,527	Risk Monitoring Committee
Komite Nominasi dan Remunerasi	10,042,507	Nomination and Remuneration Committee
Komite Audit	9,273,874	Audit Committee
Pejabat Eksekutif	156,223,656	Executive Officers
Divisi Corporate Secretary	8,322,506	Corporate Secretary Division
Divisi SKAI/Integrated & Anti Fraud	72,639,413	SKAI/Integrated & Anti Fraud Division
Divisi Risk Management/Integrated	65,410,662	Risk Management/Integrated Division
Divisi Compliance/Integrated, AML, & System Procedure	19,521,448	Compliance/Integrated, AML, & System Procedure Division
<b>Total</b>	<b>396,943,199</b>	<b>Total</b>

Informasi terkait pendidikan dan/atau pelatihan Dewan Komisaris, Direksi, Komite-Komite, Pejabat Eksekutif, Sekretaris Perusahaan, Audit Internal, dan Unit Lainnya diungkapkan sebagai berikut.

Information related to education and/or training for the Board of Commissioners, Board of Directors, Committees, Executive Officers, Corporate Secretary, Internal Audit, and Other Units is disclosed as follows.

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
<b>Dewan Komisaris / Board of Commissioners</b>					
Oliver Simorangkir	Komisaris Utama President Commissioner	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Refreshment	Bank Fraud Prevention & How to Mitigate dan Pentingnya Cyber Security dalam Digitalisasi Bank serta Kaitanya dengan Risiko Operasional  Bank Fraud Prevention & How to Mitigate and the Importance of Cyber Security in Bank Digitalization and The Relation with Operational Risks	Maisa Edukasi	Mei May
		Certification	Perpanjangan Sertifikasi Manajemen Risiko Renewal of Risk Management Certification	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institute	Mei May
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank Bank's Internal	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/ Independent Commissioner	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Refreshment	<i>Bank Fraud Prevention &amp; How to Mitigate dan Pentingnya Cyber Security</i> dalam Digitalisasi Bank serta Kaitanya dengan Risiko Operasional Bank Fraud Prevention & How to Mitigate and the Importance of Cyber Security in Bank Digitalization and The Relation with Operational Risks	Maisa Edukasi	Mei May
		Certification	Perpanjangan Sertifikasi Manajemen Risiko Renewal of Risk Management Certification	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institute	Mei May
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Zaenal Abidin, PhD	Komisaris/Komisaris Independen Commissioner/ Independen Commissioner	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Efektivitas Pengawasan Dewan Komisaris dalam Menjaga Kepatuhan Bank untuk Menuju Era Pengaturan <i>Principle Based</i> Effectiveness of the Board of Commissioners Monitoring in Maintaining Bank's Compliance Towards Principle Based Management Era	Forum Komunikasi Direktur Kepatuhan Perbankan Communications Forum of Banking Compliance Directors	Maret March
		Refreshment	<i>Bank Fraud Prevention &amp; How to Mitigate dan Pentingnya Cyber Security</i> dalam Digitalisasi Bank serta Kaitanya dengan Risiko Operasional Bank Fraud Prevention & How to Mitigate and the Importance of Cyber Security in Bank Digitalization and The Relation with Operational Risks	Maisa Edukasi	Mei May
		Certification	Perpanjangan Sertifikasi Manajemen Risiko Renewal of Risk Management Certification	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institute	Mei May
		Training Certification	Program Pelatihan Sertifikasi <i>Certification in Audit Committee Practices (CACP)</i> Training Program for Certification in Audit Committee Practices Program (CACP)	Indonesia Institute of Audit Committee	Agustus August
		Certification	Program Pelatihan Sertifikasi <i>Certification in Audit Committee Practices (CACP)</i> Training Program for Certification in Audit Committee Practices Program (CACP)	Indonesia Institute of Audit Committee	Agustus August
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
<b>Direksi / Board of Directors</b>					
Ahmad Fajar	Direktur Utama President Director	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Public Seminar	Peran SNI dalam Membangun Organisasi yang Tangguh dan Berintegrasi dalam Persaingan Bisnis SNI's roles in Building Strong Organization and Integrating in Business Competition	Badan Standardisasi Nasional National Standardization Board	Maret March
		Training Inhw	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Solving Scarcity of Leaders to Face The Era of VUCA	Infobank dan Ikatan Bankir Indonesia Infobank and Association of Indonesian Bankers	April
		Training Public	<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom in Mitigating Risk - Menyelaraskan Kebijakan dengan Lingkungan Bisnis</i> Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Synchronizing Business Policies and Business Environment	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		Training Public	<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom in Mitigating Risk - Manajemen Strategis</i> Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Strategic Management	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		Training Public	<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom in Mitigating Risk - Tantangan Pemimpin dan Pengelolaan SDM</i> Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Human Capital Leaders and Management Challenges	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Refreshment	<i>Treasury Advance Blue Print Pasar Keuangan dan Economic Outlook Q3-Q4 2021</i> Treasury Advance Blue Print of Money Market and Economic Outlook in Q3-Q4 2021	ACI Indonesia The Financial Markets Association	Juli July
		Certification	<i>Refreshment Sertifikasi Treasury Dealer Advance</i> AdVance Treasury Dealer Certification Refreshment	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	Juli July
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Rusli	Wakil Direktur Utama Deputy President Director	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Perubahan Budaya - SQEW & Greeting Frontliners Cultural Change - SQEW & Greeting Frontliners	Internal Bank Bank's Internal	Maret March

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Public Seminar	<i>Assets Recovery Strategy During Pandemic: Posisi Debt Collector di Mata Hukum dan Sosial?</i> Assets Recovery Strategy During Pandemic: Debt Collector's Position from the Perspective of Law and Social?	Infobank	Juli July
		Refreshment	<i>Treasury Advance Blue Print Pasar Keuangan dan Economic Outlook Q3-Q4 2021</i> Treasury Advance Blue Print of Money Market and Economic Outlook in Q3-Q4 2021	ACI Indonesia The Financial Markets Association	Juli July
		Certification	<i>Refreshment</i> Sertifikasi <i>Treasury Dealer Advance</i> AdVance Treasury Dealer Certification Refreshment	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	Juli July
		Public Seminar	Sosialisasi ATMR Operasional Dissemination of Operational RWA	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		Public Seminar	Sosialisasi tentang Tanggung Jawab Pelaku Usaha Jasa Keuangan (PUJK) terhadap Tindakan <i>Fraud</i> Pegawainya Dissemination on Financial Services Business Entity (PUJK)'s Responsibilities against Fraudulent Actions Committed by their Employees	Otoritas Jasa Keuangan Financial Services Authority	Agustus August
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Lembing	Direktur Bisnis Business Director	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Business Team Building	Internal Bank Bank's Internal	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Debora Wahjutirto Tanoyo	Direktur Keuangan Finance Director	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December



Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Compliance and Risk Management Director	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Efektivitas Pengawasan Dewan Komisaris dalam Menjaga Kepatuhan Bank untuk Menuju Era Pengaturan <i>Principle Based</i> Effectiveness of the Board of Commissioners Monitoring in Maintaining Bank's Compliance Towards Principle Based Management Era	Forum Komunikasi Direktur Kepatuhan Perbankan Communications Forum of Banking Compliance Directors	Maret March
		Public Seminar	Cyber Crime Typology & Cross Border Money Laundering	Forum Komunikasi Direktur Kepatuhan Perbankan Communications Forum of Banking Compliance Directors	April
		Refreshment	<i>Bank Fraud Prevention &amp; How to Mitigate dan Pentingnya Cyber Security</i> dalam Digitalisasi Bank serta Kaitanya dengan Risiko Operasional Bank Fraud Prevention & How to Mitigate and the Importance of Cyber Security in Bank Digitalization and The Relation with Operational Risks	Maisa Edukasi	Mei May
		Certification	Perpanjangan Sertifikasi Manajemen Risiko Renewal of Risk Management Certification	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institute	Mei May
		Refreshment	<i>Treasury Advance Blue Print</i> Pasar Keuangan dan <i>Economic Outlook</i> Q3-Q4 2021 Treasury Advance Blue Print of Money Market and Economic Outlook in Q3-Q4 2021	ACI Indonesia The Financial Markets Association	Juli July
		Certification	<i>Refreshment Sertifikasi Treasury Dealer Advance</i> AdVance Treasury Dealer Certification Refreshment	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institute	Juli July
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
Training Public	Arah Perkembangan Perbankan Indonesia Tahun 2022 Ditengah Upaya Menuju Digitalisasi Perbankan The Direction of Indonesian Banking Development in 2022 Amid Attempts Towards Banking Digitalization	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	Desember December		
In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December		
<b>Komite Pemantau Risiko / Risk Monitoring Committee</b>					
Zaenal Abidin, PhD	Ketua Chairman	Pengembangan kompetensi dapat dilihat pada bagian Pengembangan Kompetensi Dewan Komisaris. Competence development can be seen in the Board of Commissioners' Competence Development section.			
Oliver Simorangkir	Anggota Member				
Medi Sejati	Anggota Member	In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
Yozef Abdulrachman	Anggota Member	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Training Public	Persiapan Sertifikasi <i>Certification In Audit Committee Practices (CACP)</i> Preparation of Certification in Audit Committee Practices Program (CACP)	Indonesia Institute of Audit Committee	Agustus August
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December

**Komite Nominasi dan Remunerasi / Nomination and Remuneration Committee**

Gunawan Tenggarahardja	Ketua Chairman	Pengembangan kompetensi dapat dilihat pada bagian Pengembangan Kompetensi Dewan Komisaris. Competency development can be seen in the Board of Commissioners Competency Development section.			
Oliver Simorangkir	Anggota Member				
Syahda Candra	Anggota Member	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Public Seminar	Kasus - Kasus <i>Governance</i> di Perbankan Governance Cases in the Banking institutions	Governance Risk Compliance Professional Indonesia	Februari February
		Public Seminar	Peran SNI dalam Membangun Organisasi yang Tangguh dan Berintegrasi dalam Persaingan Bisnis SNI's roles in Building Strong Organization and Integrating in Business Competition	Badan Standardisasi Nasional National Standardization Board	Maret March
		Public Seminar	Agile of Fragile? Great Start 2021 with Drastic Action Leadership	Forum Human Capital Perbankan Indonesia dan Bank Mandiri Human Capital Forum of Indonesian Banking & Bank Mandiri	Maret March
		Public Seminar	HR Transformation to Win in Digital Competition	IPMI International Business School	Maret March
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Solving Scarcity of Leaders to Face The Era of VUCA	Infobank dan Ikatan Bankir Indonesia Infobank and Association of Indonesian Bankers	April
		Public Seminar	Human Capital Investment in Digital Era	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Mei May
		Refreshment	<i>Bank Fraud Prevention &amp; How to Mitigate dan Pentingnya Cyber Security</i> dalam Digitalisasi Bank serta Kaitanya dengan Risiko Operasional Bank Fraud Prevention & How to Mitigate and the Importance of Cyber Security in Bank Digitalization and The Relation with Operational Risks	Maisa Edukasi	Mei May

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Certification	Perpanjangan Sertifikasi Manajemen Risiko Renewal of Risk Management Certification	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institute	Mei May
		Public Seminar	<i>Launching</i> Cetak Biru Pengembangan Sumber Daya Manusia (SDM) Sektor Jasa Keuangan (SJK) 2021-2025 Launching the Blue Print of Human Resources (HR) Development for Financial Services Sector (SJK) for 2021-2025	Otoritas Jasa Keuangan Financial Services Authority	Mei May
		Public Seminar	Digitalisasi Sistem Pembayaran dan Masa Depan Jasa Keuangan di Indonesia Digitalization of Payment System and the Future of Financial Services in Indonesia	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Juni June
		In-house Training	Aspek Hukum Tranformasi Digital Legal Aspects of Digital Transformation	Kanatta Daya Indonesia	Juni June
		Public Seminar	Adapting & Sustaining The Indonesian Financial Services Sector in The Era of Digital Transformation & Industry 4.0 - Human Capital & Talent Management Perspective	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Agustus August
		In-house Training	Perkembangan Digitalisasi BCA dan Penanganan <i>Cyber Crime</i> Perbankan Development of BCA Digitalization and Banking Cyber Crime Handling	Maisa Edukasi	Agustus August
		Training Public	<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom in Mitigating Risk - Tantangan Pemimpin dan Pengelolaan SDM</i> Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Human Capital Leaders and Management Challenges	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		Public Seminar	Sosialisasi: Pengembangan SDM Industri Jasa Keuangan di Era Keuangan Digital Dissemination: Development of Financial Services Human Capital in Digital Financial Era	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Oktober October
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		Training Public	Build & Implementation Corporate Culture	Bapak Blasius Haryanto Mr. Blasius Haryanto	November
		Training Public	Gender Equality & Inclusion in the Workplace: Moving Forward With Gender Equality & Inclusion in the Workplace	Bursa Efek Indonesia dan Global Reporting Initiative Indonesia Stock Exchange and Global Reporting Initiative	November
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Training Public	Health & Safety: Safety & Health for All Building Resilient OHS System	Bursa Efek Indonesia dan Global Reporting Initiative Indonesia Stock Exchange and Global Reporting Initiative	November
		Training Public	Bond Market Update and New Financial Accounting Standards	Perhimpunan Pedagang Surat Utang Association of Promissory Note Trader	November
		Training Public	Unstoppable Indonesia: Onward to New Horizon	PT Trimegah Asset Management	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
<b>Komite Audit / Audit Committee</b>					
Gunawan Tenggarahardja	Ketua Chairman	Pengembangan kompetensi dapat dilihat pada bagian Pengembangan Kompetensi Dewan Komisaris. Competency development can be seen in the Board of Commissioners Competency Development section.			
Medi Sejati	Anggota Member	Pengembangan kompetensi dapat dilihat pada bagian Pengembangan Kompetensi Komite Pemantau Risiko. Competency development can be seen in the Risk Monitoring Committee's Competency Development section.			
Yozef Abdulrachman	Anggota Member				
<b>Pejabat Eksekutif / Executive Officer</b>					
Tjong Susanna	Senior Executive Vice President (SEVP) of Customer Relationship Management	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Consumer Loan & KPR	PT Synergi Daya Utama	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	APU PPT, Implementasi Pendekatan Berbasis Risiko TPPU/TPPT pada Perbankan AML-CTF, Implementation of TPPU/TPPT Risk Based Approach in the Banking system	PT Andara Sarana	Mei May
		In-house Training	To Grow CASA & Add New to Bank Client	Internal Bank dan Bapak W Adji Wibowo (Praktisi Bidang Perbankan) Bank's Internal and Mr W Adji Wibowo (Banking Sector Practitioner)	Juni June
		In-house Training	Perkembangan Digitalisasi BCA dan Penanganan Cyber Crime Perbankan Development of BCA Digitalization and Banking Cyber Crime Handling	Maisa Edukasi	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Claudia Audrey	Senior Executive Vice President (SEVP) of Finance, Accounting & Strategic Performance Management	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Public Seminar	Kupas Tuntas Data Science dalam Industri Jasa Keuangan Comprehensive Discussion on Data Science in Financial Service Industry	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Februari February
		Training Public	Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	Consumer Loan & KPR	PT Synergi Daya Utama	Maret March
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Managing Risk of Innovation and Digital Transformation in The New Economy Era	Indonesian Institute for Corporate Directorship	April
		Training Public	<i>Winning Culture: Mempekuat Budaya Perusahaan untuk Memenangkan Persaingan</i>  Winning culture: Strengthening Company's Culture In order to Win Competition	Galeri Human Capital	Juni June
		Public Seminar	Digitalisasi Sistem Pembayaran dan Masa Depan Jasa Keuangan di Indonesia Digitalization of Payment System and the Future of Financial Services in Indonesia	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro  Association of Financial Services industry Competence Development - Effective Pro	Juni June
		In-house Training	Aspek Hukum Tranformasi Digital Legal Aspects of Digital Transformation	Kanatta Daya Indonesia	Juni June
		In-house Training	To Grow CASA & Add New to Bank Client	Internal Bank dan Bapak W Adji Wibowo (Praktisi Bidang Perbankan)  Bank's Internal and Mr W Adji Wibowo (Banking Sector Practitioner)	Juli July
		Training Public	<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom in Mitigating Risk - Menyelaraskan Kebijakan dengan Lingkungan Bisnis</i>  Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Synchronizing Business Policies and Business Environment	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		Training Public	<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom in Mitigating Risk - Manajemen Strategis</i>  Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Strategic Management	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		Training Public	<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom in Mitigating Risk - Tantangan Pemimpin dan Pengelolaan SDM</i>  Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Human Capital Leaders and Management Challenges	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		Training Public	Build & Implementation Corporate Culture	Bapak Blasius Haryanto Mr. Blasius Haryanto	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho  Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
Muhammad Rakhmadhani	Senior Executive Vice President (SEVP) of Change Management Office	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Training Public	Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February
		In-house Training	Consumer Loan & KPR	PT Synergi Daya Utama	Maret March
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Refreshment	<i>Bank Fraud Prevention &amp; How to Mitigate dan Pentingnya Cyber Security</i> dalam Digitalisasi Bank serta Kaitanya dengan Risiko Operasional Bank Fraud Prevention & How to Mitigate and the Importance of Cyber Security in Bank Digitalization and The Relation with Operational Risks	Maisa Edukasi	Mei May
		Certification	Perpanjangan Sertifikasi Manajemen Risiko Renewal of Risk Management Certification	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institute	Mei May
		Public Seminar	Digitalisasi Sistem Pembayaran dan Masa Depan Jasa Keuangan di Indonesia Digitalization of Payment System and the Future of Financial Services in Indonesia	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Juni June
		In-house Training	To Grow CASA & Add New to Bank Client	Internal Bank dan Bapak W Adji Wibowo (Praktisi Bidang Perbankan) Bank's Internal and Mr W Adji Wibowo (Banking Sector Practitioner)	Juli July
		In-house Training	Perkembangan Digitalisasi BCA dan Penanganan <i>Cyber Crime</i> Perbankan Development of BCA Digitalization and Banking Cyber Crime Handling	Maisa Edukasi	Agustus August
		Training Public	<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom in Mitigating Risk</i> - Menyelaraskan Kebijakan dengan Lingkungan Bisnis Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Synchronizing Business Policies and Business Environment	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
Training Public	<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom in Mitigating Risk</i> - Manajemen Strategis Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Strategic Management	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August		
Training Public	<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom in Mitigating Risk</i> - Tantangan Pemimpin dan Pengelolaan SDM Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Human Capital Leaders and Management Challenges	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August		



Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Training Public	Build & Implementation Corporate Culture	Bapak Blasius Haryanto Mr. Blasius Haryanto	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Purwono	Kepala Divisi <i>International Banking</i> Head of International Banking Division	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Digitalisasi Sistem Pembayaran dan Masa Depan Jasa Keuangan di Indonesia Digitalization of Payment System and the Future of Financial Services in Indonesia	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Juni June
		Public Seminar	3 Ways of Being a Good Trainer	3Maktakterbatas	Agustus August
		Training Public	Covid-19 Pandemic as a Momentum to Digitalizing L/C Business Process	Bank Indonesia	September
		Training Public	Risk Mitigation Strategy for L/C Transactions	Bank Indonesia	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
		Ritayana	Kepala Divisi <i>Treasury</i> Head of Treasury Division	In-house Training	Accelerated Changes in The Reinvented Banking
In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes			Internal Bank Bank's Internal	Maret March
Public Seminar	Digitalisasi Sistem Pembayaran dan Masa Depan Jasa Keuangan di Indonesia Digitalization of Payment System and the Future of Financial Services in Indonesia			Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Juni June
In-house Training	Aspek Hukum Tranformasi Digital Legal Aspects of Digital Transformation			Kanatta Daya Indonesia	Juni June
In-house Training	Perkembangan Digitalisasi BCA dan Penanganan <i>Cyber Crime</i> Perbankan Development of BCA Digitalization and Banking Cyber Crime Handling			Maisa Edukasi	Agustus August

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	Technical Analysis Trading Forex	Internal Bank dan Bapak Soenawo Bank's Internal and Mr. Tri Nugroho	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Bond Market Update and New Financial Accounting Standards	Perhimpunan Pedagang Surat Utang Association of Promissory Note Trader	November
		Refreshment	Refreshment Sertifikasi Treasury Level Advance Advance Level Treasury Certification Refreshment	ACI Indonesia The Financial Markets Association	Desember December
		In-house Training	The World of Treasury from Risk and Monitoring Perspective	Talindo Edukasi Mandiri	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Syahda Candra	Kepala Divisi Human Capital Management & General Affair Head of Human Capital Management & General Affair Division	Pengembangan kompetensi dapat dilihat pada bagian Pengembangan Kompetensi Komite Nominasi dan Remunerasi. Competency development can be seen in the Nomination and Remuneration Committee's Competency Development section.			
Henry Indradjaja	Kepala Divisi SME Banking Head of SME Banking Division	Public Seminar	Corporate Restructuring Enhancing Economic and Social Value	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Januari January
		Training Public	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Training Public	Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February
		In-house Training	Consumer Loan & KPR	PT Synergi Daya Utama	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Restrukturisasi Korporasi Seri 3: Aspek Hukum Corporation Restructuring 3rd Series: Legal Aspects	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		In-house Training	Analisa Perkreditan Perkebunan Kelapa Sawit Credit Analysis for Oil Palm Plantation	PT Synergi Daya Utama	Juni June
		Public Seminar	Digitalisasi Sistem Pembayaran dan Masa Depan Jasa Keuangan di Indonesia Digitalization of Payment System and the Future of Financial Services in Indonesia	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Juni June

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	To Grow CASA & Add New to Bank Client	Internal Bank dan Bapak W Adji Wibowo (Praktisi Bidang Perbankan) Bank's Internal and Mr W Adji Wibowo (Banking Sector Practitioner)	Juni June
		In-house Training	Perkembangan Digitalisasi BCA dan Penanganan <i>Cyber Crime</i> Perbankan Development of BCA Digitalization and Banking Cyber Crime Handling	Maisa Edukasi	Agustus August
		Training Public	Build & Implementation Corporate Culture	Bapak Blasius Haryanto Mr. Blasius Haryanto	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Theresia Maria Dhewajani	Kepala Divisi Operations & Internal Control Head of Operations & Internal Control Division	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Public Seminar	Conflict of Interest: Legal & Ethical Aspect	Association of Certified Fraud Examiners	Februari February
		In-house Training	Risk Register	Internal Bank Bank's Internal	Februari February
		Training Public	Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Cyber Crime Typology & Cross Border Money Laundering	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	April
		In-house Training	Root Cause Analysis	Internal Bank Bank's Internal	Mei May
		Public Seminar	Digitalisasi Sistem Pembayaran dan Masa Depan Jasa Keuangan di Indonesia Digitalization of Payment System and the Future of Financial Services in Indonesia	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Juni June
		In-house Training	Aspek Hukum Tranformasi Digital Legal Aspects of Digital Transformation	Kanatta Daya Indonesia	Juni June
		Public Seminar	Link & Match Bagi Trainer Kompeten Link & Match for Competence Trainers	Samita Daniswara Mandiri Education & Certification	Juli July

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Public Seminar	Adapting & Sustaining The Indonesian Financial Services Sector in The Era of Digital Transformation & Industry 4.0 - Human Capital & Talent Management Perspective	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Agustus August
		Public Seminar	3 Ways of Being a Good Trainer	3Maktakterbatas	Agustus August
		Public Seminar	Sosialisasi ATMR Operasional Dissemination of Operational RWA	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		Public Seminar	Sosialisasi tentang Tanggung Jawab Pelaku Usaha Jasa Keuangan (PUJK) terhadap Tindakan <i>Fraud</i> Pegawainya Dissemination on Financial Services Business Entity (PUJK)'s Responsibilities against Fraudulent Actions Committed by their Employees	Otoritas Jasa Keuangan Financial Services Authority	Agustus August
		In-house Training	Perkembangan Digitalisasi BCA dan Penanganan <i>Cyber Crime</i> Perbankan Development of BCA Digitalization and Banking Cyber Crime Handling	Maisa Edukasi	Agustus August
		Training Public	Build & Implementation Corporate Culture	Bapak Blasius Haryanto Mr. Blasius Haryanto	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Yosef Sudikbyo	Kepala Divisi Corporate Legal Head of Corporate Legal Division	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Public Seminar	Seminar Nasional: Kepastian Hukum Sertifikat Elektronik terhadap Akta Pejabat Umum Notaris dalam Jabatan Pejabat Pembuat Akta Tanah (PPAT) (Kajian Peraturan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No. 1 Tahun 2021 Tentang Sertifikat Elektronik) National Seminar: Legal Certainty of Electronic Certificate on Public Notary Deed in Land Conveyancer Position (Assessment of Minister of Agrarian Affairs and Spatial Planning/Head of National Land Agency Regulation No. 1 of 2021 on Electronic Certificate)	Pengurus Wilayah Jawa Barat Ikatan Pejabat Pembuat Akta Tanah dan Pengurus Wilayah Jawa Barat Ikatan Notaris Indonesia The Management of West Java Association of Land Conveyancer and Management of West Java Association of Indonesian Notary	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Aspek Hukum Tranformasi Digital Legal Aspects of Digital Transformation	Kanatta Daya Indonesia	Juni June

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
Herman Suwinta	Kepala Divisi <i>Special Asset Management</i> Head of Special Asset Management Division	In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
		In-house Training	Consumer Loan & KPR	PT Synergi Daya Utama	Maret March
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank	Maret March
		Public Seminar	Aspek Finansial dan Legal Merger, Akuisi dan Valuasi Bisnis Financial and Legal Aspects of Business Merger, Acquisition and Valuation	Indonesia Training Institute dan / and Consulting Services	April
		In-house Training	APU PPT, Implementasi Pendekatan Berbasis Risiko TPPU/TPPT pada Perbankan AML-CTF, Implementation of TPPU/TPPT Risk Based Approach in the Banking system	PT Andara Sarana	Mei May
		In-house Training	Analisa Perkreditan Perkebunan Kelapa Sawit Credit Analysis for Oil Palm Plantation	PT Synergi Daya Utama	Juni June
		Public Seminar	<i>Assets Recovery Strategy During Pandemic: Posisi Debt Collector di Mata Hukum dan Sosial?</i> Assets Recovery Strategy During Pandemic: Debt Collector's Position from the Perspective of Law and Social?	Infobank	Juli July
		Training Public	Pelatihan Gugatan Sederhana sebagai Langkah Jitu Penyelesaian Kredit Macet pada Bank Simple Lawsuit Training as a Smart Measure in Resolving Bad Credits in Bank	PT Nusantara Bona Pasogit	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Managing Credit Risk	Talindo Edukasi Mandiri	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Mira Christiana	Kepala Divisi <i>Corporate Lending, Multifinance &amp; Consumer Banking</i> Head of Corporate Lending, Multifinance & Consumer Banking Division	Public Seminar	Dampak Ekonomi Sawit bagi Daerah The Impact of Oil Palm Economic for the Region	Katadata dan / and Madani	Januari January
		In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Consumer Loan & KPR	PT Synergi Daya Utama	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Public Seminar	Penyaluran Kredit Perbankan di Tengah Pandemi Distribution of Bank Credit Amid Pandemic	Ikatan Sarjana Ekonomi Indonesia Association of Bachelor of Economics	April
		Public Seminar	Aspek Finansial dan Legal Merger, Akuisisi dan Valuasi Bisnis Financial and Legal Aspects of Business Merger, Acquisition and Valuation	Indonesia Training Institute dan / and Consulting Services	April
		In-house Training	Analisa Perkreditan Perkebunan Kelapa Sawit Credit Analysis for Oil Palm Plantation	PT Synergi Daya Utama	Juni June
		Public Seminar	Keuangan Berkelanjutan dalam Pemulihan Ekonomi Nasional Sustainable Finance in National Economic Recovery	Lembaga Pengembangan Perbankan Indonesia dan Alika Indonesian Banking Development Institute and Alika	Juni June
		In-house Training	To Grow CASA & Add New to Bank Client	Internal Bank dan Bapak W Adji Wibowo (Praktisi Bidang Perbankan) Bank's Internal and Mr W Adji Wibowo (Banking Sector Practitioner)	Juli July
		In-house Training	Perkembangan Digitalisasi BCA dan Penanganan Cyber Crime Perbankan Development of BCA Digitalization and Banking Cyber Crime Handling	Maisa Edukasi	Agustus August
		Training Public	Build & Implementation Corporate Culture	Bapak Blasius Haryanto Mr. Blasius Haryanto	September
		In-house Training	Business Team Building	Internal Bank Bank's Internal	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		Public Seminar	Seminar dan Workshop Penyusunan Rencana Aksi Nasional (RAN) SDGs Seminar and Workshop for Preparation of National Action Plan (RAN) of SDGs	Bursa Efek Indonesia dan Bappenas Indonesia Stock Exchange and Bappenas	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Novita Indriyani	Wakil Kepala Divisi Credit Legal Vice Head of Credit Legal Division	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Public Seminar	Seminar Nasional: Kepastian Hukum Sertifikat Elektronik terhadap Akta Pejabat Umum Notaris dalam Jabatan Pejabat Pembuat Akta Tanah (PPAT) (Kajian Peraturan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No. 1 Tahun 2021 Tentang Sertifikat Elektronik) National Seminar: Legal Certainty of Electronic Certificate on Public Notary Deed in Land Conveyancer Position (Assessment of Minister of Agrarian Affairs and Spatial Planning/Head of National Land Agency Regulation No. 1 of 2021 on Electronic Certificate)	Pengurus Wilayah Jawa Barat Ikatan Pejabat Pembuat Akta Tanah dan Pengurus Wilayah Jawa Barat Ikatan Notaris Indonesia The Management of West Java Association of Land Conveyancer and Management of West Java Association of Indonesian Notary	Februari February
		Training Public	Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February



Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	Consumer Loan & KPR	PT Synergi Daya Utama	Maret March
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Penguatan Hak Pengelolaan Pasca Berlakunya Undang-Undang Cipta Kerja The Strengthening of Right to Manage Subsequent to the Enactment of Job Creation Law	Pengurus Wilayah Jawa Barat Ikatan Pejabat Pembuat Akta Tanah dan Pengurus Wilayah Jawa Barat Ikatan Notaris Indonesia The Management of West Java Association of Land Conveyancer and Management of West Java Association of Indonesian Notary	Maret March
		In-house Training	Analisa Perkreditan Perkebunan Kelapa Sawit Credit Analysis for Oil Palm Plantation	PT Synergi Daya Utama	Juni June
		In-house Training	Aspek Hukum Tranformasi Digital Legal Aspects of Digital Transformation	Kanatta Daya Indonesia	Juni June
		Training Public	Upgrading Program for Bank Legal Officer (Junior - Middle Level)	PT Mardika Edukasi Gemilang	Agustus August
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Hukum Pertanahan, Perijinan dan Penyelesaian Sengketa Pasca Undang-Undang Cipta Kerja Laws on Land, Permit, and Dispute Resolutions Subsequent to Job Creation Law	Pengurus Wilayah Jawa Barat Ikatan Pejabat Pembuat Akta Tanah Management of West Java Association of Land Conveyancer	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Kokot Dananjoyo Sapsoko	Kepala Divisi Loan & Trade Operations Head of Loan & Trade Operations Division	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Analisa Perkreditan Perkebunan Kelapa Sawit Credit Analysis for Oil Palm Plantation	PT Synergi Daya Utama	Juni June
		Public Seminar	3 Ways of Being a Good Trainer	3Maktakterbatas	Agustus August
		In-house Training	Perkembangan Digitalisasi BCA dan Penanganan Cyber Crime Perbankan Development of BCA Digitalization and Banking Cyber Crime Handling	Maisa Edukasi	Agustus August
		Training Public	Build & Implementation Corporate Culture	Bapak Blasius Haryanto Mr. Blasius Haryanto	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
Hans Tanurahardja	Wakil Kepala Divisi <i>Credit Monitoring &amp; Assurance</i> Vice Head of Credit Monitoring & Assurance Division	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Consumer Loan & KPR	PT Synergi Daya Utama	Maret March
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Analisa Perkreditan Perkebunan Kelapa Sawit Credit Analysis for Oil Palm Plantation	PT Synergi Daya Utama	Juni June
		Public Seminar	Keuangan Berkelanjutan dalam Pemulihan Ekonomi Nasional Sustainable Finance in National Economic Recovery	Lembaga Pengembangan Perbankan Indonesia dan Alika Indonesian Banking Development Institute and Alika	Juni June
		In-house Training	To Grow CASA & Add New to Bank Client	Internal Bank dan Bapak W Adji Wibowo (Praktisi Bidang Perbankan) Bank's Internal and Mr W Adji Wibowo (Banking Sector Practitioner)	Juli July
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Putri Tiara Virginta	Kepala Unit <i>Marketing Communication</i> Head of Marketing Communication Unit	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Training Public	Social Media Management	GNV Consulting Learning Center	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Refreshment	<i>Bank Fraud Prevention &amp; How to Mitigate dan Pentingnya Cyber Security</i> dalam Digitalisasi Bank serta Kaitanya dengan Risiko Operasional Bank Fraud Prevention & How to Mitigate and the Importance of Cyber Security in Bank Digitalization and The Relation with Operational Risks	Maisa Edukasi	Mei May
		Certification	Perpanjangan Sertifikasi Manajemen Risiko Renewal of Risk Management Certification	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institute	Mei May
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		Training Public	Marketing Analytics for Experienced Marketers	Markplus Institute	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	ALP Communication Business	Markplus Institute	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
<b>Divisi Corporate Secretary / Corporate Secretary Division</b>					
Caprie Ardira Azhar	Kepala Divisi Head of Division	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Public Seminar	International Seminar: How Indonesia's Financial Institutions & Stakeholders Respond to Climate Related Financial Risks	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Februari February
		Training Public	Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Sustainability Report	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		In-house Training	Aspek Hukum Tranformasi Digital Legal Aspects of Digital Transformation	Kanatta Daya Indonesia	Juni June
		In-house Training	Perkembangan Digitalisasi BCA dan Penanganan <i>Cyber Crime</i> Perbankan Development of BCA Digitalization and Banking Cyber Crime Handling	Maisa Edukasi	Agustus August
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Fajar Gunawan	Officer	In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Public Seminar	Penguatan Keuangan Hijau dalam Menjawab Tantangan dan Peluang Perubahan Iklim bagi Stabilitas Sistem Keuangan The Strengthening of Green Finance in Response to Challenges and Opportunities of Climate Changes for the Stability of Financial System	Infobank Institute dan / and Bank Indonesia	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Arum Laras Nurani	Officer	In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Training Public	ICSA CF Officer Workshop Series	Indonesia Corporate Secretary Association	Juni June
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Desynta Nurintani	Officer	In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
<b>Divisi SKAI/Integrated &amp; Anti Fraud / SKAI/Integrated &amp; Anti Fraud Division</b>					
Djoko Soendjojo	Kepala Divisi Head of Division	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Public Seminar	Conflict of Interest: Legal & Ethical Aspect	Association of Certified Fraud Examiners	Februari February
		Training Public	Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February
		Public Seminar	Peran SNI dalam Membangun Organisasi yang Tangguh dan Berintegrasi dalam Persaingan Bisnis SNI's roles in Building Strong Organization and Integrating in Business Competition	Badan Standardisasi Nasional National Standardization Board	Maret March
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Penguatan Sistem Pengendalian Internal Berbasis COSO dengan Memanfaatkan Teknologi Reinforcement of COSO Based Internal Control System by Using the Technology	Eksternal Bank - Bapak Lim Kurniawan dan Ibu Agnes Theres Bank's External - Mr. Lim Kurniawan and Mrs. Agnes Theres	Maret March
		Public Seminar	Penguatan Pengendalian Internal untuk Menciptakan Nilai Strengthening Internal Control in order to Generate Value	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		In-house Training	Root Cause Analysis	Internal Bank Bank's Internal	Mei May
		In-house Training	Analisa Perkreditan Perkebunan Kelapa Sawit Credit Analysis for Oil Palm Plantation	PT Synergi Daya Utama	Juni June
		In-house Training	Aspek Hukum Tranformasi Digital Legal Aspects of Digital Transformation	Kanatta Daya Indonesia	Juni June

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	To Grow CASA & Add New To Bank Client	Internal Bank dan Bapak W Adji Wibowo (Praktisi Bidang Perbankan) Bank's Internal and Mr W Adji Wibowo (Banking Sector Practitioner)	Juli July
		Public Seminar	Adapting & Sustaining The Indonesian Financial Services Sector in The Era of Digital Transformation & Industry 4.0 - Human Capital & Talent Management Perspective	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan dan Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Agustus August
		Public Seminar	3 Ways of Being A Good Trainer	3Maktakterbatas	Agustus August
		Public Seminar	Sosialisasi tentang Tanggung Jawab Pelaku Usaha Jasa Keuangan (PUJK) terhadap Tindakan <i>Fraud</i> Pegawainya Dissemination on Financial Services Business Entity (PUJK)'s Responsibilities against Fraudulent Actions Committed by their Employees	Otoritas Jasa Keuangan Financial Services Authority	Agustus August
		In-house Training	Perkembangan Digitalisasi BCA dan Penanganan <i>Cyber Crime</i> Perbankan Development of BCA Digitalization and Banking Cyber Crime Handling	Maisa Edukasi	Agustus August
		Training Public	Urgensi dan Pelaksanaan Audit Keuangan dan Pemeriksaan atas Kerugian Negara serta Pemeriksaan Pajak di Lingkungan BUMN/BUMD, Kementrian, dan Swasta Urgency and Implementation of Financial Audit and Examination on the State Loss and Tax Audit in SOE/ROE, Ministry, and Private Sectors Environment	Lembaga Berantas Korupsi Indonesia Indonesian Corruption Eradication Institution	September
		Training Public	Build & Implementation Corporate Culture	Bapak Blasius Haryanto Mr. Blasius Haryanto	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Audit Kredit Credit Auditing	Internal Bank dan Bapak Efendi Sitompul Bank's Internal and Mr. Efendi Sitompul	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Peran Internal Audit dalam Penguatan Tata Kelola Perbankan di Tengah Pandemi Internal Audit's Role in Strengthening Banking Corporate Governance Amid Pandemic	Otoritas Jasa Keuangan dan Ikatan Auditor Intern Bank Financial Services Authority and Bank Internal Auditor Association	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Ferry A Deuning	Kepala Unit Head of Unit	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Public Seminar	Penguatan Pengendalian Internal untuk Menciptakan Nilai Strengthening Internal Control in order to Generate Value	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		In-house Training	Root Cause Analysis	Internal Bank Bank's Internal	Mei May
		Public Seminar	Sosialisasi tentang Tanggung Jawab Pelaku Usaha Jasa Keuangan (PUJK) terhadap Tindakan <i>Fraud</i> Pegawainya Dissemination on Financial Services Business Entity (PUJK)'s Responsibilities against Fraudulent Actions Committed by their Employees	Otoritas Jasa Keuangan Financial Services Authority	Agustus August
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Audit Kredit Credit Auditing	Internal Bank dan Bapak Efendi Sitompul Bank's Internal and Mr. Efendi Sitompul	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Peran Internal Audit dalam Penguatan Tata Kelola Perbankan di Tengah Pandemi Internal Audit's Role in Strengthening Banking Corporate Governance Amid Pandemic	Otoritas Jasa Keuangan dan Ikatan Auditor Intern Bank Financial Services Authority and Bank Internal Auditor Association	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Joel Krissata	Senior Officer	Training Public	Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Penguatan Sistem Pengendalian Internal Berbasis COSO dengan Memanfaatkan Teknologi Reinforcement of COSO Based Internal Control System by Using the Technology	Eksternal Bank - Bapak Lim Kurnawain dan Ibu Agnes Theres Bank's External - Mr. Lim Kurnawain and Mrs. Agnes Theres	Maret March
		Public Seminar	Penguatan Pengendalian Internal untuk Menciptakan Nilai Strengthening Internal Control in order to Generate Value	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		In-house Training	Root Cause Analysis	Internal Bank Bank's Internal	Mei May
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		In-house Training	Aspek Hukum Transformasi Digital Legal Aspects of Digital Transformation	Kanatta Daya Indonesia	Juni June
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		Training Certification	Guide to CAFM Certification	Asia Anti Fraud	September
		Certification	Ujian Sertifikasi CAFM CAFM Certification Exam	Asia Anti Fraud	September

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Audit Kredit Credit Auditing	Internal Bank dan Bapak Efendi Sitompul Bank's Internal and Mr. Efendi Sitompul	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Peran Internal Audit dalam Penguatan Tata Kelola Perbankan di Tengah Pandemi Internal Audit's Role in Strengthening Banking Corporate Governance Amid Pandemic	Otoritas Jasa Keuangan dan Ikatan Auditor Intern Bank Financial Services Authority and Bank Internal Auditor Association	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Fadillah Syarif	Senior Officer	In-house Training	Consumer Loan & KPR	PT Synergi Daya Utama	Maret March
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Penguatan Sistem Pengendalian Internal Berbasis COSO dengan Memanfaatkan Teknologi Reinforcement of COSO Based Internal Control System by Using the Technology	Eksternal Bank - Bapak Lim Kurnawain dan Ibu Agnes Theres Bank's External - Mr. Lim Kurnawain and Mrs. Agnes Theres	Maret March
		Public Seminar	Penguatan Pengendalian Internal untuk Menciptakan Nilai Strengthening Internal Control in order to Generate Value	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		Public Seminar	Restrukturisasi Korporasi Seri 3: Aspek Hukum Corporation Restructuring 3rd Series: Legal Aspects	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		In-house Training	Root Cause Analysis	Internal Bank Bank's Internal	Mei May
		In-house Training	Analisa Perkreditan Perkebunan Kelapa Sawit Credit Analysis for Oil Palm Plantation	PT Synergi Daya Utama	Juni June
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Audit Kredit Credit Auditing	Internal Bank dan Bapak Efendi Sitompul Bank's Internal and Mr. Efendi Sitompul	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Peran Internal Audit dalam Penguatan Tata Kelola Perbankan di Tengah Pandemi Internal Audit's Role in Strengthening Banking Corporate Governance Amid Pandemic	Otoritas Jasa Keuangan dan Ikatan Auditor Intern Bank Financial Services Authority and Bank Internal Auditor Association	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December



Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
Mami Marsirah	Junior Officer	Training Certification	Pembekalan <i>Certified Information System Auditor</i> Briefing of Certified Information System Auditor	PT Systech Global Informasi	Maret March
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Penguatan Sistem Pengendalian Internal Berbasis COSO dengan Memanfaatkan Teknologi Reinforcement of COSO Based Internal Control System by Using the Technology	Eksternal Bank - Bapak Lim Kurnawain dan Ibu Agnes Theres Bank's External - Mr. Lim Kurnawain and Mrs. Agnes Theres	Maret March
		Public Seminar	Penguatan Pengendalian Internal untuk Menciptakan Nilai Strengthening Internal Control in order to Generate Value	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		In-house Training	Root Cause Analysis	Internal Bank Bank's Internal	Mei May
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Audit Kredit Credit Auditing	Internal Bank dan Bapak Efendi Sitompul Bank's Internal and Mr. Efendi Sitompul	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Peran Internal Audit dalam Penguatan Tata Kelola Perbankan di Tengah Pandemi Internal Audit's Role in Strengthening Banking Corporate Governance Amid Pandemic	Otoritas Jasa Keuangan dan Ikatan Auditor Intern Bank Financial Services Authority and Bank Internal Auditor Association	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
		Rifqi Dhia Ramadhan	Junior Officer	In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes
In-house Training	Penguatan Sistem Pengendalian Internal Berbasis COSO dengan Memanfaatkan Teknologi Reinforcement of COSO Based Internal Control System by Using the Technology			Eksternal Bank - Bapak Lim Kurnawain dan Ibu Agnes Theres Bank's External - Mr. Lim Kurnawain and Mrs. Agnes Theres	Maret March
Public Seminar	Penguatan Pengendalian Internal untuk Menciptakan Nilai Strengthening Internal Control in order to Generate Value			Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
In-house Training	Root Cause Analysis			Internal Bank Bank's Internal	Mei May
Certification	Sertifikasi Manajemen Risiko Level 1 Risk Management Certification Level 1			Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institute	Mei May

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		In-house Training	To Grow CASA & Add New To Bank Client	Internal Bank dan Bapak W Adji Wibowo (Praktisi Bidang Perbankan) Bank's Internal and Mr W Adji Wibowo (Banking Sector Practitioner)	Juli July
		In-house Training	Mitigasi Kejadian <i>Fraud</i> Melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Audit Kredit Credit Auditing	Internal Bank dan Bapak Efendi Sitompul Bank's Internal and Mr. Efendi Sitompul	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Certification	Pembekalan Sertifikasi Audit Level Auditor Briefing for Auditor Level Audit Certification	Efektifpro	November
		Certification	Sertifikasi Audit Level Auditor Auditor Level Audit Certification	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	November
		Training Public	Peran Internal Audit dalam Penguatan Tata Kelola Perbankan di Tengah Pandemi Internal Audit's Role in Strengthening Banking Corporate Governance Amid Pandemic	Otoritas Jasa Keuangan dan Ikatan Auditor Intern Bank Financial Services Authority and Bank Internal Auditor Association	Desember December
		In-house Training	The World of Treasury from Risk and Monitoring Perspective	Talindo Edukasi Mandiri	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Jantamen Simanjuntak	Junior Officer	In-house Training	Consumer Loan & KPR	PT Synergi Daya Utama	Maret March
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Penguatan Sistem Pengendalian Internal Berbasis COSO dengan Memanfaatkan Teknologi Reinforcement of COSO Based Internal Control System by Using the Technology	Eksternal Bank - Bapak Lim Kurnawain dan Ibu Agnes Theres Bank's External - Mr. Lim Kurnawain and Mrs. Agnes Theres	Maret March
		Public Seminar	Penguatan Pengendalian Internal untuk Menciptakan Nilai Strengthening Internal Control in order to Generate Value	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		Public Seminar	Restrukturisasi Korporasi Seri 3: Aspek Hukum Corporation Restructuring 3rd Series: Legal Aspects	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		In-house Training	Root Cause Analysis	Internal Bank Bank's Internal	Mei May
		In-house Training	Analisa Perkreditan Perkebunan Kelapa Sawit Credit Analysis for Oil Palm Plantation	PT Synergi Daya Utama	Juni June

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	To Grow CASA & Add New To Bank Client	Internal Bank dan Bapak W Adji Wibowo (Praktisi Bidang Perbankan) Bank's Internal and Mr. W Adji Wibowo (Banking Sector Practitioner)	Juli July
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Audit Kredit Credit Auditing	Internal Bank dan Bapak Efendi Sitompul Bank's Internal and Mr. Efendi Sitompul	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Peran Internal Audit dalam Penguatan Tata Kelola Perbankan di Tengah Pandemi Internal Audit's Role in Strengthening Banking Corporate Governance Amid Pandemic	Otoritas Jasa Keuangan dan Ikatan Auditor Intern Bank Financial Services Authority and Bank Internal Auditor Association	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
<b>Divisi Risk Management/Integrated / Risk Management/Integrated Division</b>					
Hermawan	Kepala Divisi Head of Division	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Training Public	Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Training Public	Meningkatkan Efektivitas Program Pemulihan Ekonomi Nasional Enhancing the Effectiveness of National Economic Recovery Program	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Juni June
		In-house Training	Aspek Hukum Tranformasi Digital Legal Aspects of Digital Transformation	Kanatta Daya Indonesia	Juni June
		Public Seminar	Sosialisasi ATMR Operasional Dissemination of Operational RWA	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		In-house Training	Perkembangan Digitalisasi BCA dan Penanganan <i>Cyber Crime</i> Perbankan Development of BCA Digitalization and Banking Cyber Crime Handling	Maisa Edukasi	Agustus August

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Training Public	Menjadikan Industri Jasa Keuangan Adaptif dan Antisipatif - Sosialisasi Peraturan Otoritas Jasa Keuangan terkini tentang Kelembagaan Bank, Percepatan Perizinan Produk Bank, dan Penguatan Penanganan Lembaga Jasa Keuangan  To Ensure Adaptive and Anticipative Financial Services Industry - Dissemination of the Latest Financial Services Authority Regulation regarding Bank Institutional, Acceleration of Banking Products Licenses, and Reinforcement of Financial Services Institution Management	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		Public Seminar	Menjadikan Industri Jasa Keuangan Adaptif dan Antisipatif - Sosialisasi Peraturan Otoritas Jasa Keuangan terkini tentang Kelembagaan Bank, Percepatan Perizinan Produk Bank, dan Penguatan Penanganan Lembaga Jasa Keuangan  To Ensure Adaptive and Anticipative Financial Services Industry - Dissemination of the Latest Financial Services Authority Regulation regarding Bank Institutional, Acceleration of Banking Products Licenses, and Reinforcement of Financial Services Institution Management	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		Training Public	Asset Liability Management in Uncharted New Normal	Bankers Association for Risk Management	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Refreshment	Identifikasi Transaksi Keuangan Mencurigakan Identification of Suspicious Financial Transactions	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	November
		Certification	Refreshment Sertifikasi Kepatuhan Compliance Certification Refreshment	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Susanty Octaviani	Kepala Unit Head of Unit	In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	APU PPT, Implementasi Pendekatan Berbasis Risiko TPPU/TPPT pada Perbankan AML-CTF, Implementation of TPPU/TPPT Risk Based Approach in the Banking system	PT Andara Sarana	Mei May
		Training Public	Penerapan <i>Governance Risk &amp; Compliance</i> di Era Digital: Strategi dan Aksi Implementation of Governance Risk and Compliance in Digital Era: Strategy and Action	Otoritas Jasa Keuangan Financial Services Authority	Juni June
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		Training Public	Loan Covid Restructuring After Implementation of Peraturan Otoritas Jasa Keuangan No. 48/2020 Covid Loan Restructuring After Implementation of Financial Services Authority Regulation No. 48/2020	Bankers Association for Risk Management	Agustus August

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Audit Kredit Credit Auditing	Internal Bank dan Bapak Efendi Sitompul Bank's Internal and Mr. Efendi Sitompul	Oktober October
		Training Public	Asset Liability Management in Uncharted New Normal	Bankers Association for Risk Management	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Meru Tri P	Senior Officer	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Public Seminar	Kasus-kasus <i>Governance</i> di Perbankan Governance Cases in the Banking institutions	Governance Risk Compliance Professional Indonesia	Februari February
		Training Public	Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Modus Kejahatan Siber dalam Layanan Jasa Keuangan Cyber Crime Modes in Financial Services	PT Mardika Edukasi Gemilang	April
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		Public Seminar	ATMR Operasional dan Budaya Manajemen Risiko Operational RWA and Risk Management Culture	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		In-house Training	Mitigasi Kejadian <i>Fraud</i> Melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		Public Seminar	Mengelola Risiko Siber dalam Industri Digital Managing Cyber Risks in Digital Industry	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	September
		Training Public	<i>Advanced Liquidity Risk Management, Stress Testing &amp; Contingency Planning</i> - Metode Pengelolaan Eksposur Risiko Likuiditas Secara Mendalam dari Konsep hingga Implementasi Advanced Liquidity Risk Management, Stress Testing & Contingency Planning - In Depth Liquidity Risk Exposure Management Method from Concept to the implementation	Learning Media Indonesia	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Audit Kredit Credit Auditing	Internal Bank dan Bapak Efendi Sitompul Bank's Internal and Mr. Efendi Sitompul	Oktober October

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Lia Megarita	Senior Officer	Public Seminar	Kasus-kasus <i>Governance</i> di Perbankan Governance Cases in the Banking institutions	Governance Risk Compliance Professional Indonesia	Februari February
		Training Public	Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Sustainability Report	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		Public Seminar	Keuangan Berkelanjutan dalam Pemulihan Ekonomi Nasional Sustainable Finance in National Economic Recovery	Lembaga Pengembangan Perbankan Indonesia dan Alika Indonesian Banking Development Institute and Alika	Juni June
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		Training Public	Perhitungan IRRBB, Pendekatan NII, dan EVE Sesuai Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018 (Menggunakan Aplikasi Kertas Kerja Microsoft Excel) Calculation of IRRBB, NII Approach, and EVE According to Financial Services Circular No. 12/SEOJK.03/2018 (Using Microsoft Excel Worksheet Application)	Learning Media Indonesia	Agustus August
		Training Public	Menjadikan Industri Jasa Keuangan Adaptif dan Antisipatif - Sosialisasi Peraturan Otoritas Jasa Keuangan terkini tentang Kelembagaan Bank, Percepatan Perizinan Produk Bank, dan Penguatan Penanganan Lembaga Jasa Keuangan To Ensure Adaptive and Anticipative Financial Services Industry - Dissemination of the Latest Financial Services Authority Regulation regarding Bank Institutional, Acceleration of Banking Products Licenses, and Reinforcement of Financial Services Institution Management	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		In-house Training	Mitigasi Kejadian <i>Fraud</i> Melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		Training Public	Membangun Manajemen Risiko Lengkap dan Sehat Establishing Complete and Sound Risk Management	Red & White Consulting Training	Oktober October
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Public Seminar	<i>Economic Outlook 2022: Prospek Ekonomi Makro dan Sektor Keuangan 2022</i> Economic Outlook 2022: Macro Economic and Financial Sector Prospects in 2022	Berita Satu Media Holdings	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Fitri Ramadhanis	Officer	Public Seminar	Kasus-kasus <i>Governance</i> di Perbankan Governance Cases in the Banking institutions	Governance Risk Compliance Professional Indonesia	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
Tuhfatur Rosyida	Officer	Public Seminar	Kasus-kasus <i>Governance</i> di Perbankan Governance Cases in the Banking institutions	Governance Risk Compliance Professional Indonesia	Februari February
		In-house Training	Consumer Loan & KPR	PT Synergi Daya Utama	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Restrukturisasi Korporasi Seri 3: Aspek Hukum Corporation Restructuring 3rd Series: Legal Aspects	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		In-house Training	APU PPT, Implementasi Pendekatan Berbasis Risiko TPPU/TPPT pada Perbankan AML-CTF, Implementation of TPPU/TPPT Risk Based Approach in the Banking system	PT Andara Sarana	Mei May
		In-house Training	Analisa Perkreditan Perkebunan Kelapa Sawit Credit Analysis for Oil Palm Plantation	PT Synergi Daya Utama	Juni June
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		Training Public	<i>Loan Covid Restructuring After Implementation of Peraturan Otoritas Jasa Keuangan No. 48/2020</i> Covid Loan Restructuring After Implementation of Financial Services Authority Regulation No. 48/2020	Bankers Association for Risk Management	Agustus August
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Audit Kredit Credit Auditing	Internal Bank dan Bapak Efendi Sitompul Bank's Internal and Mr. Efendi Sitompul	Oktober October
		Training Public	Perhitungan <i>Integrated Stress Test Model</i> (Risiko Likuiditas, Kredit, Pasar, dan Operasional) untuk Mengukur Tingkat Ketahanan Bank dan <i>Recovery Plan</i> dalam Kondisi Ekonomi Ekstrem Dampak Covid-19 Calculation of Integrated Stress Test Model (Liquidity, Credit, Market, and operational Risks) to Measure the Bank Resilience Rating and Recovery Plan in Covid-19 Impacted Extreme Economic Condition	Banking Finance Development Center	November
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November



Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Training Public	Connecting the Dots Showcasing the Potential of Innovative Credit Scoring	Fintech Indonesia dan Otoritas Jasa Keuangan Fintech Indonesia and Financial Services Authority	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Imanuel Rano Juliano Sakuain	Officer	Public Seminar	Kasus-kasus <i>Governance</i> di Perbankan Governance Cases in the Banking institutions	Governance Risk Compliance Professional Indonesia	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Sustainability Report	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		In-house Training	APU PPT, Implementasi Pendekatan Berbasis Risiko TPPU/TPPT pada Perbankan AML-CTF, Implementation of TPPU/TPPT Risk Based Approach in the Banking system	PT Andara Sarana	Mei May
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		Public Seminar	Mengelola Risiko Siber dalam Industri Digital Managing Cyber Risks in Digital Industry	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	September
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		Training Public	Membangun Manajemen Risiko Lengkap dan Sehat Establishing Complete and Sound Risk Management	Red & White Consulting Training	Oktober October
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	November
Samuel Halomoan	Officer	Public Seminar	Kasus-kasus <i>Governance</i> di Perbankan Governance Cases in the Banking institutions	Governance Risk Compliance Professional Indonesia	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Modus Kejahatan Siber dalam Layanan Jasa Keuangan Cyber Crime Modes in Financial Services	PT Mardika Edukasi Gemilang	April
		Public Seminar	Cyber Crime Typology & Cross Border Money Laundering	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	April
		In-house Training	APU PPT, Implementasi Pendekatan Berbasis Risiko TPPU/TPPT pada Perbankan AML-CTF, Implementation of TPPU/TPPT Risk Based Approach in the Banking system	PT Andara Sarana	Mei May
		Training Public	Meningkatkan Efektivitas Program Pemulihan Ekonomi Nasional Enhancing the Effectiveness of National Economic Recovery Program	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Juni June

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		Training Public	Perhitungan IRRBB, Pendekatan NII, dan EVE Sesuai Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018 (Menggunakan Aplikasi Kertas Kerja Microsoft Excel) Calculation of IRRBB, NII Approach, and EVE According to Financial Services Circular No. 12/SEOJK.03/2018 (Using Microsoft Excel Worksheet Application)	Learning Media Indonesia	Agustus August
		In-house Training	Mitigasi Kejadian <i>Fraud</i> Melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		Training Public	<i>Advanced Liquidity Risk Management, Stress Testing &amp; Contingency Planning</i> - Metode Pengelolaan Eksposur Risiko Likuiditas Secara Mendalam dari Konsep hingga Implementasi Advanced Liquidity Risk Management, Stress Testing & Contingency Planning - In Depth Liquidity Risk Exposure Management Method from Concept to the implementation	Learning Media Indonesia	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		Training Public	Perhitungan <i>Integrated Stress Test Model</i> (Risiko Likuiditas, Kredit, Pasar, dan Operasional) untuk Mengukur Tingkat Ketahanan Bank dan <i>Recovery Plan</i> dalam Kondisi Ekonomi Ekstrem Dampak Covid-19 Calculation of Integrated Stress Test Model (Liquidity, Credit, Market, and operational Risks) to Measure the Bank Resilience Rating and Recovery Plan in Covid-19 Impacted Extreme Economic Condition	Banking Finance Development Center	November
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	The World of Treasury from Risk and Monitoring Perspective	Talindo Edukasi Mandiri	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Melya Sari Putri	Officer	In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		Public Seminar	ATMR Operasional dan Budaya Manajemen Risiko Operational RWA and Risk Management Culture	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		Public Seminar	Mengelola Risiko Siber dalam Industri Digital Managing Cyber Risks in Digital Industry	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Training Public	Perhitungan <i>Integrated Stress Test Model</i> (Risiko Likuiditas, Kredit, Pasar, dan Operasional) untuk Mengukur Tingkat Ketahanan Bank dan <i>Recovery Plan</i> dalam Kondisi Ekonomi Ekstrim Dampak Covid-19 Calculation of Integrated Stress Test Model (Liquidity, Credit, Market, and operational Risks) to Measure the Bank Resilience Rating and Recovery Plan in Covid-19 Impacted Extreme Economic Condition	Banking Finance Development Center	November
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		In-house Training	Governance, Risk, and Compliance	Internal Bank	Desember December
<b>Divisi Compliance/Integrated, AML, &amp; System Procedure / Compliance/Integrated, AML, &amp; System Procedure Division</b>					
Lidwina Dian Pratiwi	Kepala Divisi Head of Division	In-house Training	Accelerated Changes In The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Public Seminar	Conflict Of Interest: Legal & Ethical Aspect	Association of Certified Fraud Examiners	Februari February
		Public Seminar	International Seminar: How Indonesia's Financial Institutions & Stakeholders Respond to Climate Related Financial Risks	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Februari February
		Public Seminar	Kasus-kasus <i>Governance</i> di Perbankan Governance Cases in the Banking institutions	Governance Risk Compliance Professional Indonesia	Februari February
		Training Public	Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February
		Public Seminar	Peran SNI dalam Membangun Organisasi yang Tangguh dan Berintegrasi dalam Persaingan Bisnis SNI's roles in Building Strong Organization and Integrating in Business Competition	Badan Standardisasi Nasional National Standardization Board	Maret March
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Sustainability Report	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		Public Seminar	Cyber Crime Typology & Cross Border Money Laundering	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	April
		Training Public	Penerapan <i>Governance Risk dan Compliance</i> di Era Digital: Strategi dan Aksi Implementation of Governance Risk and Compliance in Digital Era: Strategy and Action	Otoritas Jasa Keuangan Financial Services Authority	Juni June
		Public Seminar	Keuangan Berkelanjutan dalam Pemulihan Ekonomi Nasional Sustainable Finance in National Economic Recovery	Lembaga Pengembangan Perbankan Indonesia dan Alika Indonesian Banking Development Institute and Alika	Juni June

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Public Seminar	Digitalisasi Sistem Pembayaran dan Masa Depan Jasa Keuangan di Indonesia Digitalization of Payment System and the Future of Financial Services in Indonesia	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Juni June
		In-house Training	Aspek Hukum Tranformasi Digital Legal Aspects of Digital Transformation	Kanatta Daya Indonesia	Juni June
		Training Public	Legal & Compliance Aspect in Fraud Risk Management	IPC Learning & Consulting	Juni June
		Public Seminar	Good Corporate Governance to Build Ethical Culture	IPC Learning & Consulting	Juli July
		Training Public	Ekonomi Sirkular: Aktivitas yang Menguntungkan Menuju Tujuan Pembangunan Berkelanjutan (SDGs) Circular Economic: Profitable Activities for the Achievement of Sustainable Development Goals (SDGs)	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		Training Public	Menjadikan Industri Jasa Keuangan Adaptif dan Antisipatif - Sosialisasi Peraturan Otoritas Jasa Keuangan terkini tentang Kelembagaan Bank, Percepatan Perizinan Produk Bank, dan Penguatan Penanganan Lembaga Jasa Keuangan To Ensure Adaptive and Anticipative Financial Services Industry - Dissemination of the Latest Financial Services Authority Regulation regarding Bank Institutional, Acceleration of Banking Products Licenses, and Reinforcement of Financial Services Institution Management	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		Training Certification	Persiapan Ujian Sertifikasi Kepatuhan Level 1 Preparation of Level 1 Compliance Certification Exam	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	September
		Certification	Sertifikasi Kepatuhan Level 1 Compliance Certification Level 1	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institute	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		Public Seminar	Seminar dan <i>Workshop</i> Penyusunan Rencana Aksi Nasional (RAN) SDGs Seminar and Workshop for Preparation of National Action Plan (RAN) of SDGs	Bursa Efek Indonesia dan Bappenas Indonesia Stock Exchange and Bappenas	Oktober October
		Training Public	Developing Responsible Credit and Investment Policies	The Prakarsa	November
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Strategi Korporasi Berkelanjutan: Membangun Tata Kelola, Manajemen Risiko, dan Kepatuhan Menuju Kinerja Berprinsip Sustainable Corporate Strategy: Establishing Governance, Risk and Compliance Management and Heading Towards Principle Based Performance	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	November

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Training Public	Arah Perkembangan Perbankan Indonesia Tahun 2022 Ditengah Upaya Menuju Digitalisasi Perbankan The Direction of Indonesian Banking Development in 2022 Amid Attempts Towards Banking Digitalization	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	Desember December
		Public Seminar	Penguatan Keuangan Hijau dalam Menjawab Tantangan dan Peluang Perubahan Iklim bagi Stabilitas Sistem Keuangan The Strengthening of Green Finance in Response to Challenges and Opportunities of Climate Changes for the Stability of Financial System	Infobank Institute dan / and Bank Indonesia	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
		Public Seminar	Tantangan Milenial Merebut Peluang Akses Pembiayaan dalam Ekosistem UMKM dan Ekonomi Hijau Millennial Challenges in Seizing Opportunities to Financing Access in MSME Ecosystem and Green Economic	Otoritas Jasa Keuangan Financial Services Authority	Desember December
Chairul Bahri	Kepala Unit Head of Unit	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Refreshment	Identifikasi Transaksi Keuangan Mencurigakan Identification of Suspicious Financial Transactions	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	November
		Certification	Refreshment Sertifikasi Kepatuhan Compliance Certification Refreshment	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	November
		Training Public	Arah Perkembangan Perbankan Indonesia Tahun 2022 Ditengah Upaya Menuju Digitalisasi Perbankan The Direction of Indonesian Banking Development in 2022 Amid Attempts Towards Banking Digitalization	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
		Training Public	Pelaksanaan Sistem Tata Kelola Perusahaan yang Baik untuk Meningkatkan Efektifitas Pemahaman Dan Penerapan APU-PPT Implementation of Good Corporate Governance System to Improve the Effectiveness of Comprehension and Implementation of AML-CTF	PT Andara Sarana	Desember December
Budi Setiawan	Kepala Unit Head of Unit	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		Public Seminar	Kasus-kasus Governance di Perbankan Governance Cases in the Banking institutions	Governance Risk Compliance Professional Indonesia	Februari
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Training Public	Penerapan <i>Governance Risk dan Compliance</i> di Era Digital: Strategi dan Aksi Implementation of Governance Risk and Compliance in Digital Era: Strategy and Action	Otoritas Jasa Keuangan Financial Services Authority	Juni June
		Training Public	Legal & Compliance Aspect in Fraud Risk Management	IPC Learning & Consulting	Juni June
		Training Public	Menjadikan Industri Jasa Keuangan Adaptif dan Antisipatif - Sosialisasi Peraturan Otoritas Jasa Keuangan terkini tentang Kelembagaan Bank, Percepatan Perizinan Produk Bank, dan Penguatan Penanganan Lembaga Jasa Keuangan To Ensure Adaptive and Anticipative Financial Services Industry - Dissemination of the Latest Financial Services Authority Regulation regarding Bank Institutional, Acceleration of Banking Products Licenses, and Reinforcement of Financial Services Institution Management	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Audit Kredit Credit Auditing	Internal Bank dan Bapak Efendi Sitompul Bank's Internal and Mr. Efendi Sitompul	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Refreshment	Identifikasi Transaksi Keuangan Mencurigakan Identification of Suspicious Financial Transactions	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	November
		Certification	<i>Refreshment</i> Sertifikasi Kepatuhan Compliance Certification Refreshment	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	November
		Training Public	Arah Perkembangan Perbankan Indonesia Tahun 2022 Ditengah Upaya Menuju Digitalisasi Perbankan The Direction of Indonesian Banking Development in 2022 Amid Attempts Towards Banking Digitalization	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Yuniar Adelina	Senior Officer	In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Training Public	Penerapan <i>Governance Risk dan Compliance</i> di Era Digital: Strategi dan Aksi Implementation of Governance Risk and Compliance in Digital Era: Strategy and Action	Otoritas Jasa Keuangan Financial Services Authority	Juni
		Training Public	Menjadikan Industri Jasa Keuangan Adaptif dan Antisipatif - Sosialisasi Peraturan Otoritas Jasa Keuangan terkini tentang Kelembagaan Bank, Percepatan Perizinan Produk Bank, dan Penguatan Penanganan Lembaga Jasa Keuangan Ensuring Adaptive and Anticipative Financial Services Industry - Dissemination of the Latest Financial Services Authority Regulation regarding Bank Institutional, Acceleration of Banking Products Licenses, and Reinforcement of Financial Services Institution Management	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	Mitigasi Kejadian <i>Fraud</i> Melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Strategi Korporasi Berkelanjutan: Membangun Tata Kelola, Manajemen Risiko, dan Kepatuhan Menuju Kinerja Berprinsip Sustainable Corporate Strategy: Establishing Governance, Risk and Compliance Management and Heading Towards Principle Based Performance	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	November
		Training Public	Arah Perkembangan Perbankan Indonesia Tahun 2022 Ditengah Upaya Menuju Digitalisasi Perbankan The Direction of Indonesian Banking Development in 2022 Amid Attempts Towards Banking Digitalization	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
Dinar Nur Affini	Senior Officer	Public Seminar	International Seminar: How Indonesia's Financial Institutions & Stakeholders Respond to Climate Related Financial Risks	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Februari
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Sustainability Report	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April
		Training Public	Penerapan <i>Governance Risk dan Compliance</i> di Era Digital: Strategi dan Aksi Implementation of Governance Risk and Compliance in Digital Era: Strategy and Action	Otoritas Jasa Keuangan Financial Services Authority	Juni June
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		Training Public	Legal & Compliance Aspect in Fraud Risk Management	IPC Learning & Consulting	Juni June
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		Public Seminar	Seminar dan <i>Workshop</i> Penyusunan Rencana Aksi Nasional (RAN) SDGs Seminar and Workshop for Preparation of National Action Plan (RAN) of SDGs	Bursa Efek Indonesia dan Bappenas Indonesia Stock Exchange and Bappenas	Oktober October
		Training Public	Developing Responsible Credit and Investment Policies	The Prakarsa	November
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November



Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		Training Public	Arah Perkembangan Perbankan Indonesia Tahun 2022 Ditengah Upaya Menuju Digitalisasi Perbankan The Direction of Indonesian Banking Development in 2022 Amid Attempts Towards Banking Digitalization	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	Desember December
		Public Seminar	Penguatan Keuangan Hijau dalam Menjawab Tantangan dan Peluang Perubahan Iklim bagi Stabilitas Sistem Keuangan The Strengthening of Green Finance in Response to Challenges and Opportunities of Climate Changes for the Stability of Financial System	Infobank Institute dan / and Bank Indonesia	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
		Public Seminar	Tantangan Milenial Merebut Peluang Akses Pembiayaan dalam Ekosistem UMKM dan Ekonomi Hijau Millennial Challenges in Seizing Opportunities to Financing Access in MSME Ecosystem and Green Economic	Otoritas Jasa Keuangan Financial Services Authority	Desember December
Julki Fly Saragih	Senior Officer	Public Seminar	Kasus-kasus <i>Governance</i> di Perbankan Governance Cases in the Banking institutions	Governance Risk Compliance Professional Indonesia	Februari February
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	APU PPT, Implementasi Pendekatan Berbasis Risiko TPPU/TPPT pada Perbankan AML-CTF, Implementation of TPPU/TPPT Risk Based Approach in the Banking system	PT Andara Sarana	Mei May
		Training Public	Penerapan <i>Governance Risk &amp; Compliance</i> di Era Digital: Strategi dan Aksi Implementation of Governance Risk and Compliance in Digital Era: Strategy and Action	Otoritas Jasa Keuangan Financial Services Authority	Juni June
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		Public Seminar	Digitalisasi Sistem Pembayaran dan Masa Depan Jasa Keuangan di Indonesia Digitalization of Payment System and the Future of Financial Services in Indonesia	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Juni June
		Training Public	Legal & Compliance Aspect in Fraud Risk Management	IPC Learning & Consulting	Juni June
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Audit Kredit Credit Auditing	Internal Bank dan Bapak Efendi Sitompul Bank's Internal and Mr. Efendi Sitompul	Oktober October

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Strategi Korporasi Berkelanjutan: Membangun Tata Kelola, Manajemen Risiko dan Kepatuhan Menuju Kinerja Berprinsip Sustainable Corporate Strategy: Establishing Governance, Risk and Compliance Management and Heading Towards Principle Based Performance	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	November
		Training Public	Arah Perkembangan Perbankan Indonesia Tahun 2022 Ditengah Upaya Menuju Digitalisasi Perbankan The Direction of Indonesian Banking Development in 2022 Amid Attempts Towards Banking Digitalization	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
		Training Public	Pelaksanaan Sistem Tata Kelola Perusahaan yang Baik untuk Meningkatkan Efektifitas Pemahaman Dan Penerapan APU-PPT Implementation of Good Corporate Governance System to Improve the Effectiveness of Comprehension and Implementation of AML-CTF	PT Andara Sarana	Desember December
		Public Seminar	Tantangan Milenial Merebut Peluang Akses Pembiayaan dalam Ekosistem UMKM dan Ekonomi Hijau Millennial Challenges in Seizing Opportunities to Financing Access in MSME Ecosystem and Green Economic	Otoritas Jasa Keuangan Financial Services Authority	Desember December
Yusuf Doi Pratama	Senior Officer	In-house Training	Accelerated Changes in The Reinvented Banking	Internal Bank Bank's Internal	Januari January
		In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Public Seminar	Cyber Crime Typology & Cross Border Money Laundering	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	April
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		Public	Legal & Compliance Aspect in Fraud Risk Management	IPC Learning & Consulting	Juni June
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Arah Perkembangan Perbankan Indonesia Tahun 2022 Ditengah Upaya Menuju Digitalisasi Perbankan The Direction of Indonesian Banking Development in 2022 Amid Attempts Towards Banking Digitalization	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	Desember December

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
		Training Public	Pelaksanaan Sistem Tata Kelola Perusahaan yang Baik untuk Meningkatkan Efektifitas Pemahaman Dan Penerapan APU-PPT Implementation of Good Corporate Governance System to Improve the Effectiveness of Comprehension and Implementation of AML-CTF	PT Andara Sarana	Desember December
Syafril Himawan	Senior Officer	In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		Training Public	Penerapan <i>Governance Risk &amp; Compliance</i> di Era Digital: Strategi dan Aksi Implementation of Governance Risk and Compliance in Digital Era: Strategy and Action	Otoritas Jasa Keuangan Financial Services Authority	Juni June
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		Public Seminar	Digitalisasi Sistem Pembayaran dan Masa Depan Jasa Keuangan di Indonesia Digitalization of Payment System and the Future of Financial Services in Indonesia	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Juni June
		Training Public	Legal & Compliance Aspect in Fraud Risk Management	IPC Learning & Consulting	Juni June
		Training Public	Menjadikan Industri Jasa Keuangan Adaptif dan Antisipatif - Sosialisasi Peraturan Otoritas Jasa Keuangan Terkini tentang Kelembagaan Bank, Percepatan Perizinan Produk Bank, dan Penguatan Penanganan Lembaga Jasa Keuangan Ensuring Adaptive and Anticipative Financial Services Industry - Dissemination of the Latest Financial Services Authority Regulation regarding Bank Institutional, Acceleration of Banking Products Licenses, and Reinforcement of Financial Services Institution Management	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Arah Perkembangan Perbankan Indonesia Tahun 2022 Ditengah Upaya Menuju Digitalisasi Perbankan The Direction of Indonesian Banking Development in 2022 Amid Attempts Towards Banking Digitalization	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December

Nama Name	Jabatan Position	Jenis Pelatihan Type of Training	Materi Material	Penyelenggara Organizer	Waktu Schedule
Parulian Pakpahan	Officer	In-house Training	Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank Bank's Internal	Maret March
		In-house Training	APU PPT, Implementasi Pendekatan Berbasis Risiko TPPU/TPPT pada Perbankan AML-CTF, Implementation of TPPU/TPPT Risk Based Approach in the Banking system	PT Andara Sarana	Mei May
		Training Public	Penerapan <i>Governance Risk &amp; Compliance</i> di Era Digital: Strategi dan Aksi Implementation of Governance Risk and Compliance in Digital Era: Strategy and Action	Otoritas Jasa Keuangan Financial Services Authority	Juni June
		Training Public	Keuangan Berkelanjutan dalam Pemulihan Ekonomi Nasional Sustainable Finance in National Economic Recovery	Lembaga Pengembangan Perbankan Indonesia dan Alika Indonesian Banking Development Institute and Alika	Juni June
		In-house Training	Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June
		Public Seminar	Digitalisasi Sistem Pembayaran dan Masa Depan Jasa Keuangan di Indonesia Digitalization of Payment System and the Future of Financial Services in Indonesia	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services industry Competence Development - Effective Pro	Juni June
		Training Public	Legal & Compliance Aspect in Fraud Risk Management	IPC Learning & Consulting	Juni June
		In-house Training	Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September
		In-house Training	Digital Transformation Improving The Odds of Success	Internal Bank Bank's Internal	Oktober October
		In-house Training	Transaction Banking	Internal Bank dan Bapak Tri Nugroho Bank's Internal and Mr. Tri Nugroho	November
		Training Public	Arah Perkembangan Perbankan Indonesia Tahun 2022 Ditengah Upaya Menuju Digitalisasi Perbankan The Direction of Indonesian Banking Development in 2022 Amid Attempts Towards Banking Digitalization	Forum Komunikasi Direktur Kepatuhan Perbankan Forum of Banking Compliance Directors	Desember December
		In-house Training	Governance, Risk, and Compliance	Internal Bank Bank's Internal	Desember December
		Training Public	Pelaksanaan Sistem Tata Kelola Perusahaan yang Baik untuk Meningkatkan Efektifitas Pemahaman Dan Penerapan APU-PPT Implementation of Good Corporate Governance System to Improve the Effectiveness of Comprehension and Implementation of AML-CTF	PT Andara Sarana	Desember December





# Analisis dan Pembahasan Manajemen

Management Discussion and Analysis

## Bank Victoria dan Entitas Anak Bank Victoria and Subsidiaries



**Total Aset**  
Total Assets

2021	:	<b>Rp24.95</b>
2020	:	<b>Rp26.22</b>

triliun / trillion

↓ 4.86%



**Total Liabilitas**  
Total Liabilities

2021	:	<b>Rp20.70</b>
2020	:	<b>Rp22.20</b>

triliun / trillion

↓ 6.74%



**Total Ekuitas**  
Total Equity

2021	:	<b>Rp3.01</b>
2020	:	<b>Rp2.64</b>

triliun / trillion

↑ 13.99%



**Total Dana Syirkah Temporer**  
Total Temporary Syirkah Funds

2021	:	<b>Rp1.23</b>
2020	:	<b>Rp1.38</b>

triliun / trillion

↓ 10.78%







## Tinjauan Ekonomi

### Economic Overview



### Perekonomian Global

Meskipun masih dibayangi oleh pandemi Covid-19, perekonomian global tumbuh sesuai proyeksi sekitar 5,7% pada tahun 2021 setelah mengalami kontraksi pertumbuhan sebesar 3,1% pada tahun sebelumnya. Sementara itu, ketidakpastian pasar keuangan global masih terus berlanjut sejalan dengan risiko yang masih mengemuka, antara lain terkait peningkatan penyebaran Covid-19 varian Delta, antisipasi pasar terhadap kebijakan *tapering the fed*, serta kekhawatiran tekanan inflasi yang berlangsung lebih lama akibat gangguan rantai pasokan dan keterbatasan energi.

Kebijakan pembatasan mobilitas masih diberlakukan untuk mencegah penyebaran Covid-19 varian Delta yang menimbulkan dampak pada tertahannya aktivitas ekonomi. Hal ini tercermin dari indeks keyakinan konsumen, penjualan ritel, indeks keyakinan bisnis, serta Purchasing Managers' Index (PMI) yang melandai pada triwulan II 2021. Namun, pada triwulan III 2021 mobilitas manusia dan aktivitas ekonomi kemudian berangsur-angsur membaik seiring dengan penurunan pada kasus varian Delta.

### Global Economy

Although still overshadowed by the Covid-19 pandemic, the global economy grew as projected by around 5.7% in 2021 after having a growth contraction of 3.1% in the previous year. Whereas, global financial market uncertainty continued along with emerging risks, among others, related to the increased spread of the Covid-19 Delta variant, market anticipation towards the Fed's tapering policy, and concerns over inflationary pressures that lasted longer due to supply chain disruptions and energy limitations.

The mobility restriction policy was still in place to prevent the Covid-19 Delta variant spread which disrupted the economic activities. This was reflected in the consumer confidence index, retail sales, business confidence index, and Purchasing Managers' Index (PMI), which fell in the second quarter of 2021. However, in the third quarter of 2021, people's mobility and economic activity gradually improved along with the decline in the Delta variant cases.

Pemulihan ekonomi di negara ekonomi maju, khususnya Amerika Serikat berjalan lebih cepat yang didukung oleh akselerasi vaksinasi dan stimulus kebijakan fiskal dan moneter yang sangat besar. Sementara itu, sebagian besar negara ekonomi berkembang, kecuali Tiongkok masih harus berjuang memperbaiki kondisi ekonominya dikarenakan adanya keterbatasan pasokan dan kemampuan vaksinasi serta keterbatasan kemampuan stimulus fiskal dan moneter yang turut menyebabkan lebih lambatnya proses pemulihan ekonomi.

Sumber / Source :  
Laporan Perekonomian Indonesia 2021 - Bank Indonesia.  
Indonesia Economic Report 2021 - Bank Indonesia.

## Perekonomian Nasional

Membaiknya perekonomian global terus memberikan imbas positif terhadap pertumbuhan ekonomi Indonesia. Di tahun 2021, perekonomian Indonesia tumbuh sebesar 3,69% sejalan dengan meningkatnya mobilitas pasca langkah-langkah penanganan yang ditempuh Pemerintah dalam pengendalian Covid-19 varian Delta. Kinerja konsumsi swasta, investasi, serta konsumsi Pemerintah diperkirakan terus meningkat, di tengah tetap terjaganya kinerja ekspor. Dari sisi lapangan usaha, pertumbuhan tertinggi diperoleh jasa kesehatan dan kegiatan sosial 10,46%, diikuti informasi dan komunikasi sebesar 6,81%, serta pengadaan listrik dan gas sebesar 5,55%, sedangkan jasa keuangan dan asuransi tumbuh sebesar 1,56%.

Sementara itu, dari sisi pengeluaran pertumbuhan tertinggi terjadi pada komponen ekspor barang dan jasa sebesar 24,04%, diikuti komponen PK-P sebesar 4,17%, komponen pembentukan modal tetap bruto (PMTB) sebesar 3,80%, komponen pengeluaran konsumsi rumah tangga (PK-RT) sebesar 2,02%, dan komponen pengeluaran konsumsi lembaga nonprofit yang melayani rumah tangga (PK-LNPRT) sebesar 1,59%.

Selain itu, sejumlah indikator hingga Desember 2021 telah menunjukkan proses pemulihan yang berlanjut, seperti peningkatan mobilitas masyarakat di berbagai daerah, kenaikan penjualan eceran, penguatan keyakinan konsumen, serta ekspansi PMI Manufaktur.

Sumber / Source :  
• Tinjauan Kebijakan Moneter Desember 2021 - Bank Indonesia; dan  
• Pertumbuhan Ekonomi Indonesia Triwulan IV-2021 BRS No. 14/02/Th. XXV, 7 Februari 2022 - Badan Pusat Statistik.  
• Monetary Policy Review December 2021 - Bank Indonesia; and  
• Indonesia Economic Growth Quarter IV-2021 BRS No. 14/02/Th. XXIV, 7 February 2021 - Statistics Indonesia.

Economic recovery in developed countries, particularly the United States, was progressing faster, supported by accelerated vaccinations and very large fiscal and monetary policy stimulus. While most developing countries, except China, still had to struggle to improve their economic conditions due to the limited vaccination supply and capacity as well as limited fiscal and monetary stimulus capabilities, resulting slower economic recovery process.

## National Economy

The improvement in the global economy continues to have a positive impact on Indonesia's economic growth. In 2021, the Indonesian economy grew by 3.69% in line with the increased mobility after the Government took measures to handle and control the Covid-19 Delta variant. The performance of private consumption, investment, and government consumption is predicted to continue to increase, while export performance is maintained. In terms of business sector, the highest growth occurred in the health services and social activities at 10.46%, followed by information and communication at 6.81%, electricity and gas procurement at 5.55%, and financial and insurance services at 1.56%.

Whereas, in terms of expenditure, the highest growth occurred in export component of goods and services at 24.04%, followed by PK-P component at 4.17%, gross fixed capital formation (PMTB) component at 3.80%, household consumption expenditure component (PK-RT) at 2.02%, and consumption expenditure component of nonprofit institutions serving households (PK-LNPRT) of 1.59%.

Furthermore, a number of indicators until December 2021 showed a continuing recovery process, such as increased mobility of people in various regions, increased retail sales, strengthened consumer confidence, and expansion of Manufacturing PMI.

## Tinjauan Pasar Keuangan dan Industri Perbankan

Otoritas Jasa Keuangan mencatat stabilitas sektor jasa keuangan hingga akhir 2021 tetap terjaga diiringi dengan fungsi intermediasi perbankan dan penghimpunan dana di pasar modal yang terus membaik didorong terkendalinya pandemi Covid-19, pulihnya mobilitas, dan meningkatnya kegiatan perekonomian. Pemerintah bersama Bank Indonesia melakukan bauran kebijakan fiskal dan moneter melalui pembelian SBN untuk pendanaan APBN 2021 sebesar Rp358,32 triliun yang terdiri dari pembelian di pasar perdana sebesar Rp143,32 triliun dan *private placement* sebesar Rp215 triliun untuk pembiayaan penanganan kesehatan dan kemanusiaan dalam rangka penanganan dampak pandemi Covid-19. Bank Indonesia juga menempuh kebijakan suku bunga rendah, stabilisasi nilai tukar Rupiah, dan injeksi likuiditas (*quantitative easing*).

Selain itu, Otoritas Jasa Keuangan dan Lembaga Penjamin Simpanan mengeluarkan kebijakan terkait restrukturisasi kredit/pembiayaan dan menetapkan tingkat bunga penjaminan yang rendah serta memberikan relaksasi denda keterlambatan pembayaran premi penjaminan perbankan untuk mengupayakan terbentuknya tingkat suku bunga di sektor jasa keuangan yang lebih efisien.

Dari segi kredit, pertumbuhan kredit terus melanjutkan peningkatan positif sepanjang tahun 2021. Permintaan kredit membaik sejalan dengan meningkatnya aktivitas dunia usaha dan konsumsi sebagai dampak melonggarnya aktivitas masyarakat. Seluruh kelompok penggunaan kredit terus mencatat *tren* pertumbuhan, baik kredit investasi, kredit konsumsi dan kredit modal kerja. Di sektor konsumsi, kredit pemilikan rumah terus mencatat pertumbuhan tinggi yaitu sebesar 9,13% (*yoy*) pada Desember 2021. Sementara itu, pertumbuhan kredit UMKM meningkat pada Desember 2021 yang ditunjukkan masih berlanjutnya perbaikan di sektor riil dan dunia usaha khususnya UMKM.

Melalui dukungan berbagai kebijakan tersebut, kondisi likuiditas perbankan pada tahun 2021 mengalami pelonggaran yang tercermin dari rasio alat likuid/*non-core deposit* dan alat likuid/DPK masing-masing sebesar 154,90% dan 34,24%, di atas ambang batas ketentuan masing-masing pada level 50% dan 10%. Dari sisi permodalan, lembaga jasa keuangan juga mencatatkan permodalan yang semakin membaik yang tercermin dari peningkatan CAR menjadi sebesar 25,62% atau jauh di atas *threshold*.

Pencapaian kinerja industri perbankan secara umum dan pada bank BUKU II, pada tahun 2021 mengalami pertumbuhan jika dibandingkan dengan tahun 2020. Pertumbuhan tersebut tercermin dari meningkatnya kinerja aset, dana pihak ketiga (DPK), dan kredit yang diberikan.

## Overview of Financial Market and Banking Industry

The Financial Services Authority recorded that the stability of financial services sector until the end of 2021 was maintained, accompanied by the banking intermediation function and improved funding in the capital market, driven by the control of the Covid-19 pandemic, restoration of mobility, and increased economic activities. The government and Bank Indonesia apply fiscal and monetary policy mix by purchasing SBN for the 2021 APBN (State Budget) funding of Rp358.32 trillion, consisting of purchases in the primary market of Rp143.32 trillion and private placement of Rp215 trillion to finance the health and humanity for the purpose of handling the Covid-19 pandemic impact. Bank Indonesia also adopted a policy of low interest rates, stabilization of Rupiah exchange rate, and liquidity injection (*quantitative easing*).

Furthermore, the Financial Services Authority and Deposit Insurance Corporation issued policies regarding loan/financing restructuring and set a low guarantee interest rate and relaxed penalties for late payment of bank guarantee premiums as efforts to establish a more efficient interest rate in the financial services sector.

In terms of loans, loans growth continued to increase positively throughout 2021. Loans demand improved in line with the increased business activities and consumptions as a result of loosening policies on public activities. All loans usage groups continued to record growth trends, including investment loans, consumption loans, and working capital loans. In the consumption sector, house mortgage loans continued to record high growth of 9.13% (*yoy*) in December 2021. Whereas, MSME loans growth increased in December 2021, which was shown by continued improvement in the real sector and business world, especially MSMEs.

Through the support of these various policies, banking liquidity conditions in 2021 were eased as reflected in ratios of liquid assets/*non-core deposits* and liquid assets/DPK of 154.90% and 34.24%, respectively, above the respective regulatory thresholds at 50% and 10% levels. In terms of capital, financial services institutions also recorded improved capital as reflected in CAR increase to 25.62% or well above the threshold.

The achievements of banking industry in general and in BUKU II banks experienced growth in 2021 compared to in 2020. This growth was reflected in the increasing performance of assets, third party deposits (DPK), and loans.

Uraian	Industri Perbankan Banking Industry		Bank BUKU II BUKU II Banks		Description
	2021	2020	2021	2020	
<b>KINERJA KEUANGAN / FINANCIAL PERFORMANCE</b>					(dalam miliar Rupiah / in billion Rupiah)
Aset	10,112,304	8,780,681	1,195,504	897,206	Assets
DPK	7,479,463	6,665,390	793,773	648,871	Third-Party Deposits
Kredit	5,820,636	5,547,618	651,624	539,011	Loans
<b>RASIO KEUANGAN / FINANCIAL RATIOS</b>					(dalam % / in %)
Net Interest Margin (NIM)	4.51	4.45	3.74	4.57	Net Interest Margin (NIM)
Return on Assets (ROA)	1.84	1.59	1.14	1.31	Return on Assets (ROA)
Loan to Deposits Ratio (LDR)	77.13	82.54	81.26	82.73	Loan to Deposits Ratio (LDR)
Capital Adequacy Ratio (CAR)	25.67	23.89	36.88	24.57	Capital Adequacy Ratio (CAR)
Beban Operasional Pendapatan Operasional (BOPO)	83.58	86.58	91.55	91.71	Operating Expense to Operating Income (BOPO)

### Aset

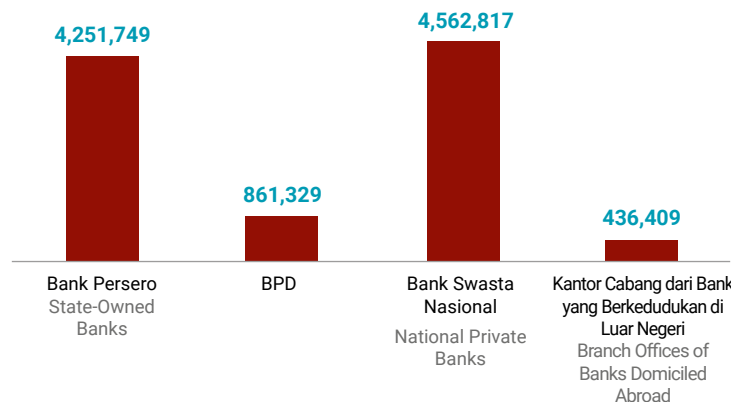
Di tahun 2021, aset industri perbankan tercatat sebesar Rp10.112,30 triliun, meningkat sebesar Rp1.331,62 triliun atau 15,17% dari Rp8.780,68 triliun pada tahun 2020. Sejalan dengan pertumbuhan aset industri perbankan, aset bank BUKU II pada tahun 2021 turut mengalami peningkatan sebesar Rp292,30 triliun atau 33,25% menjadi Rp1.195,50 triliun dari Rp897,21 triliun pada tahun 2020.

### Assets

In 2021, the banking industry's assets were recorded at Rp10,112.30 trillion, an increase of Rp1,331.62 trillion or 15.17% from Rp8,780.68 trillion in 2020. In line with the growth of banking industry assets, BUKU II bank assets in 2021 also increased by Rp292.30 trillion or 33.25% to Rp1,195.50 trillion from Rp897.21 trillion in 2020.

### Perkembangan Aset Industri Perbankan berdasarkan Kelompok Bank Banking Industry Asset Growth by Banking Group

(dalam miliar Rupiah/ in billion Rupiah)



Berdasarkan kelompok bank, kepemilikan aset terbesar pada tahun 2021 berasal dari kelompok Bank Swasta Nasional dengan komposisi aset mencapai 45,12%, dilanjutkan dengan Bank Persero yang memiliki komposisi sebesar 42,05% dari total aset industri perbankan.

Based on banking group, the largest asset ownership in 2021 came from the National Private Bank group with an asset composition of 45.12%, followed by State-Owned Banks with a composition of 42.05% of the total assets of the banking industry.

### Dana Pihak Ketiga

Sumber dana perbankan didominasi oleh dana pihak ketiga (DPK), baik bank umum maupun bank BUKU II. Selain DPK, sumber dana bank juga dapat berasal dari kewajiban kepada Bank Indonesia, kewajiban kepada bank lain, surat berharga yang diterbitkan, pinjaman yang diterima, kewajiban spot dan derivatif, kewajiban lainnya, serta setoran jaminan.

### Third-Party Deposits

Sources of banking funds are dominated by third-party deposits (DPK), for commercial banks and BUKU II banks. In addition to DPK, sources of funding for banks are also collected from obligations to Bank Indonesia, obligations to other banks, securities issued, loans received, spot and derivative obligations, other obligations, and guarantee deposits.

(dalam miliar Rupiah/ in billion Rupiah)

Uraian	Industri Perbankan Banking Industry		Bank BUKU II BUKU II Banks		Description
	2021	2020	2021	2020	
<b>Rupiah</b>	<b>6,442,601</b>	<b>5,756,007</b>	<b>667,465</b>	<b>605,441</b>	<b>Rupiah</b>
Giro	1,591,523	1,262,734	178,191	109,985	Current Account
Tabungan	2,263,564	2,014,663	138,651	146,614	Savings
Simpanan Berjangka	2,587,514	2,478,610	350,623	348,843	Time Deposits
<b>Valas</b>	<b>1,036,862</b>	<b>909,383</b>	<b>126,308</b>	<b>43,430</b>	<b>Forex</b>
Giro	551,982	424,401	66,157	19,634	Current Account
Tabungan	168,696	158,837	19,372	5,182	Savings
Simpanan Berjangka	316,184	326,145	40,779	18,614	Time Deposits
<b>Total Dana Pihak Ketiga</b>	<b>7,479,463</b>	<b>6,665,390</b>	<b>793,773</b>	<b>648,871</b>	<b>Total Third-Party Deposits</b>

DPK industri perbankan pada tahun 2021 tercatat sebesar Rp7.479,46 triliun, mengalami kenaikan sebesar 12,21% atau setara Rp814,07 triliun dibandingkan tahun 2020 sebesar Rp6.665,39 triliun. Peningkatan DPK industri perbankan dikontribusikan oleh meningkatnya giro hingga 27,05%. Sementara itu, DPK bank BUKU II turut mencatatkan pertumbuhan sebesar 22,33% dari Rp648,87 triliun menjadi Rp793,77 triliun.

The total Third-Party Deposits of banking Industry in 2021 was recorded at Rp7,479.46 trillion, an increase of 12.21% compared to in 2020 of Rp6,665.39 trillion. The increase in third party deposits of the banking industry was contributed by the increase in current account by 27.05%. Whereas, BUKU II banks recorded an increase of Third-Party Deposits of 22.33% from Rp648.87 trillion to Rp793.77 trillion.

### Kredit yang Diberikan

Penyaluran dana terdiri dari kredit yang diberikan, penempatan pada bank lain, penempatan pada Bank Indonesia, surat berharga, penyertaan, cadangan kerugian penurunan nilai aset keuangan (CKPN), tagihan spot dan derivatif, serta tagihan lainnya.

### Loans

Fund distribution consists of loans, placements with other banks, placements with Bank Indonesia, securities, investments, allowance for impairment losses (CKPN) on financial assets, spot and derivative receivables, and other receivables.

(dalam miliar Rupiah / in billion Rupiah)

Uraian	Industri Perbankan Banking Industry		Bank BUKU II BUKU II Banks		Description
	2021	2020	2021	2020	
Kepada Pihak Ketiga	5,768,585	5,481,560	644,999	536,810	To Third Parties
Kepada Bank Lain	52,051	66,058	6,625	2,200	To Other Banks
<b>Total Kredit yang Diberikan</b>	<b>5,820,636</b>	<b>5,547,618</b>	<b>651,624</b>	<b>539,011</b>	<b>Total Loans</b>

Sepanjang tahun 2021, penyaluran kredit pada industri perbankan tercatat sebesar Rp5.820,64 triliun, meningkat sebesar 4,92% jika dibandingkan dengan tahun 2020 yang tercatat sebesar Rp5.547,62 triliun. Meningkatnya kredit pada

Throughout 2021, the total loans of banking Industry was recorded at Rp5,820.64 trillion, an increase of 4.92% compared to in 2020 of Rp5,547.62 trillion. The increase in loans in the banking industry was influenced by third party lending which

industri perbankan dipengaruhi oleh penyaluran kredit pihak ketiga yang tumbuh sebesar 5,24% atau setara Rp287,03 triliun. Sejalan dengan peningkatan penyaluran kredit pada industri perbankan, penyaluran kredit pada bank BUKU II juga tercatat mengalami peningkatan sebesar 20,89% dari Rp539,01 triliun di tahun 2020 menjadi Rp651,62 triliun pada 2021.

grew by 5.24% or equivalent to Rp287.03 trillion. In line with the increase in lending to the banking industry, lending to BUKU II banks also recorded an increase of 20.89% from Rp539.01 trillion in 2020 to Rp651.62 trillion in 2021.

Sumber / Source :

- Laporan Perekonomian Indonesia 2021 - Bank Indonesia;
- Siaran Pers No: 1/KSSK/Pers/2022 tanggal 2 Februari 2022 "Sinergi Memperkuat Pemulihan Ekonomi dan Menjaga Stabilitas Sistem Keuangan" - Otoritas Jasa Keuangan;
- Siaran Pers No. SP 86/DHMS/OJK/XII/2021 tanggal 30 Desember 2021 "Akhir Tahun Sektor Jasa Keuangan Stabil Dengan Kinerja Membaik" - Otoritas Jasa Keuangan; dan
- Statistik Perbankan Indonesia Desember 2021 - Otoritas Jasa Keuangan.
- Indonesia Economic Report 2021 - Bank Indonesia;
- Press Release No. 1/KSSK/Pers/2022 dated 2 February 2022 "Synergy to Strengthen Economic Recovery and Maintain Financial System Stability" - Financial Services Authority;
- Press Release No. SP 86/DHMS/OJK/XII/2021 dated 30 December 2021 "At End of Year, Financial Services Sector is Stable with Improved Performance" - Financial Services Authority; and
- Indonesian Banking Statistics December 2021 - Financial Services Authority.

## Tinjauan Operasional

### Operational Overview

#### Strategi Pengembangan Bisnis

Bank Victoria berkomitmen untuk selalu memberikan produk dan layanan yang terbaik bagi nasabah, meningkatkan kepuasan dan loyalitas nasabah sekaligus meningkatkan kinerja Bank. Sepanjang tahun 2021, Bank Victoria telah menetapkan langkah-langkah strategis untuk mencapai target pertumbuhan bisnis yang diuraikan sebagai berikut.

##### 1. Strategi Pengembangan Penghimpunan DPK

Dalam memperkuat proposisi produk DPK, Bank Victoria telah menetapkan beberapa strategi bisnis dan pendekatan teknologi yang dilakukan sebagai berikut.

- Internet Banking* dan *Mobile Banking* (IBMB) baru dengan fitur yang menarik dan beberapa produk digital didalamnya;
- Digital deposito;
- Digital *operations*;
- Tema digitalisasi yang cepat menghadapi perubahan dan memberikan layanan/produk yang aman, cepat, mudah diraih, dan nyaman;
- Akan diperkenalkan produk bank persepsi, *cash management*, dan *transactional banking* guna memberikan daya tarik pada nasabah-nasabah korporasi untuk berbisnis dengan Bank;
- Beberapa produk dengan *fee based* (Bank Persepsi, RDN); dan
- Pembayaran menggunakan QR nasional.

#### Business Development Strategy

Bank Victoria is committed to always providing the best products and services for customers, increasing customer satisfaction and loyalty while improving the Bank's performance. Throughout 2021, Bank Victoria set strategic steps to achieve the business growth targets which are described as follows.

##### 1. Development Strategy of DPK (Third-Party Deposits) Collection

In strengthening the proposition of DPK products, Bank Victoria has established several business strategies and technological approaches, which are carried out as follows.

- New Internet Banking and Mobile Banking (IBMB) with attractive features and several digital products;
- Digital time deposits;
- Digital operations;
- Digital themes that swiftly face the changes and provide safe, easy, accessible, and convenient services/products;
- Perception bank products will be introduced, also cash management, and transactional banking to attract corporate customers to do business with the Bank;
- Several fee-based products (Perception Bank, RDN); and
- Payment using national QR.



## 2. Strategi Pembiayaan Kredit

Segmentasi bisnis kredit yang sebelumnya banyak terfokus pada korporasi akan bergeser pada sektor lainnya. Beberapa perubahan yang akan terjadi pada sektor usaha kredit diuraikan sebagai berikut.

- a. Segmentasi bisnis SME/komersial dan konsumen akan naik signifikan menjadi berkisar di angka 25%-30% untuk SME/komersial dan 10-15% untuk bisnis konsumen;
- b. Sektor usaha tidak akan didominasi oleh sektor properti;
- c. *Monitoring pipeline* dan bisnis akan dilakukan secara rutin dan akan dibantu dikembangkan melalui *pipeline monitoring system*;
- d. Pengenalan produk dan layanan baru pada sektor usaha kredit;
- e. Penerapan *circle leader model* untuk *monitoring* dan mencari *leads* bisnis; serta
- f. Waktu proses kredit harus dipercepat, yang rata-rata sebelumnya 2 (dua) bulan untuk TTY proses (*Time to Yes*), akan menjadi kurang dari 1 (satu) bulan.

## 3. Aspek Operasional dan Teknologi

Secara umum, tema strategi terkait dengan aspek operasional dan teknologi yang akan diterapkan oleh Bank ke depan adalah menyediakan layanan dan produk serta operasional perbankan yang SQEW (*Safe, Quick, Easy, dan Warm*) yang berbasis kepada orientasi bisnis yang berkelanjutan. Adapun poin-poin yang akan diterapkan oleh Bank kedepan sebagai berikut.

- a. Jalur efektifitas proses operasional dari hulu ke hilir dievaluasi dan diperbaiki;
- b. Kualitas administrasi dan percepatan proses dapat diwujudkan baik dari sisi perkreditan, operasional, dan teknologi informasi;
- c. Transaksi yang semakin kompleks dan meningkat jumlahnya dapat di kirim secara tepat waktu, *zero defect*, dan memberikan kepuasan kepada nasabah;
- d. Data *corebanking* dapat diolah dan didistribusikan kepada berbagai unit kerja yang membutuhkan dalam bentuk laporan yang tepat dan akurat sehingga proses pengambilan keputusan bisnis lebih efektif;
- e. Dapat mengikuti perkembangan arah bisnis yang lebih fokus ke *retail banking* sehingga dapat sejajar dengan bank pesaing;
- f. Peningkatan layanan dan produk perbankan dengan bentuk *digital banking*; dan
- g. Peningkatan keamanan dilakukan dengan *monitoring tools* atas transaksi perbankan dengan aplikasi SPLUNK yang berbasis SIEM.

## 2. Loan Financing Strategy

Loan business segmentation that previously focused more on corporates is shifting to other sectors. Several changes that will take place in the loan business sector are described as follows.

- a. Segmenting SME/commercial and consumer businesses that will increase significantly to around 25-30% for SME/commercial and 10-15% for consumer business;
- b. Business sectors will not be dominated by property sector;
- c. Monitoring pipeline and business routinely and will be developed through pipeline monitoring system;
- d. Introducing new products and services in loan business sector;
- e. Applying circle leader model to monitor and find business leads; and
- f. Loan process duration needs to be shorten, which was previously an average of 2 (two) months for Time to Yes (TTY) process, to be less than 1 (one) month.

## 3. Operational and Technological Aspects

In general, the strategy theme related to the operational and technological aspects that will be applied by the Bank to the future is providing services and products as well as banking operations that are SQEW (*Safe, Quick, Easy, and Warm*) based on sustainable business orientation. Below are points to be applied by the Bank to the future.

- a. Evaluating and improving the effectiveness of operational process path from upstream to downstream;
- b. The quality of administration and acceleration of process can be realized in terms of loans, operations, and information technology;
- c. Transactions that are increasingly complex and increasing in number can be delivered in a timely manner with zero defect, and thus provide satisfaction to customers;
- d. Corebanking data can be processed and distributed to various work units that need it in the form of proper and accurate reports so that the business decision making process is more effective;
- e. Able to follow the development of business directions that are more focused on retail banking in order to be in line with the competing banks;
- f. Increasing banking services and products in the form of digital banking; and
- g. Increasing security is carried out by monitoring tools on banking transactions by using SIEM-based SPLUNK application.



## Strategi Pemasaran

Bank Victoria telah menerapkan berbagai strategi pemasaran dalam rangka meningkatkan penjualan produk-produk Bank melalui pengembangan produk dan bisnis untuk mempertahankan dan meningkatkan posisi Bank Victoria di industri perbankan Indonesia. Adapun strategi pemasaran yang dilakukan Bank pada tahun 2021 sebagai berikut.

1. Menerapkan program *integrated marketing* yang mencakup *marketing collateral*, *merchandise*, jaringan cabang, situs perusahaan, media sosial, dan marketing *channel* lainnya serta *tactical campaign* melalui *event/ exhibition/seminar*, *office to office*, promo eksternal, dan internal;
2. Fokus kepada produk yang telah dimiliki, mengevaluasi, dan melakukan perbaikan yang diperlukan untuk menambah daya saing seperti menjalankan program *launching* untuk *internet banking* dan *mobile banking* serta *internet banking business* untuk mendukung produk yang ada;
3. Memfasilitasi program media untuk meningkatkan *news value* dan interaksi Bank Victoria di media massa maupun ranah publik melalui media *briefing*, media *luncheon*, *press conference*, media *sponsorship*, media *hampers*, *mascot* dan *merchandise (gimmicks)*;
4. Menggelar acara *community banking* di wilayah operasional bank melalui program Ayo ke Bank sebagai bagian dari literasi keuangan dan memasuki *market* pelajar, terutama di tingkat Sekolah Dasar;
5. Melakukan *competitive analysis* produk dan layanan *peer group* serta bank-bank acuan dengan tujuan memantau perkembangan produk dan layanan yang ada di pasaran; serta
6. Meningkatkan portofolio kredit khususnya kepada nasabah UKM dan Komersial.

## Pangsa Pasar

Bank Victoria secara umum menghadapi persaingan dengan seluruh bank umum yang ada di Indonesia dalam menentukan penguasaan pasar. Persaingan usaha tersebut antara lain dapat dilihat berdasarkan jumlah aset yang dimiliki, jumlah dana pihak ketiga yang berhasil dihimpun, dan jumlah kredit yang diberikan.

Pangsa pasar Bank Victoria dibandingkan dengan industri perbankan secara keseluruhan di Indonesia dan dibandingkan bank BUKU II, selama 2 (dua) tahun terakhir, dijelaskan dalam tabel berikut.

## Marketing Strategies

Bank Victoria has implemented various marketing strategies in order to increase the Bank's product sales through product and business development to maintain and improve Bank Victoria's position in the Indonesian banking industry. The marketing strategies carried out by the Bank in 2021 were as follows.

1. Implementing integrated marketing programs that include marketing collateral, merchandise, branch networks, company website, social media, and other marketing channels as well as tactical campaigns through events/ exhibitions/ seminars, office to office, external and internal promotions;
2. Focusing on existing products, evaluating, and making necessary improvements to increase competitiveness, such as running launching programs for internet banking and mobile banking as well as internet banking business to support existing products;
3. Facilitating media programs to increase news value and interaction of Bank Victoria in the mass media and the public space through media briefings, media luncheons, press conferences, media sponsorships, media hampers, mascots and merchandise (gimmicks);
4. Holding community banking events in the Bank's operational areas through Ayo ke Bank (Let's Go to the Bank) program as part of financial literacy and entering the student market, especially at elementary school level;
5. Conducting competitive analysis of peer group products and services as well as reference banks with the aim of monitoring the development of products and services available on the market; and
6. Increasing loan portfolio, especially for SME and Commercial customers.

## Market Share

Bank Victoria, in general, faces competition with all commercial banks in Indonesia in determining market control. Business competition among others can be seen based on the amount of assets owned, the amount of third-party deposits collected, and the amount of loans provided.

Bank Victoria's market share compared to that of banking industry as a whole in Indonesia and compared to that of BUKU II banks for the past 2 (two) years is described in the following table.

Uraian Description	Bank	2021	2020
<b>KINERJA KEUANGAN / FINANCIAL PERFORMANCE</b>		(dalam miliar Rupiah, kecuali dinyatakan lain / in billion Rupiah, unless stated otherwise)	
Aset Assets	Industri Perbankan Banking Industry	<b>10,112,304</b>	8,780,681
	Bank BUKU II BUKU II Banks	<b>1,195,504</b>	897,206
	Bank Victoria*	<b>23,660</b>	24,280
	Pangsa Pasar Industri Perbankan (%) Market Share of Banking Industry (%)	<b>0.23</b>	0.28
	Pangsa pasar Bank BUKU II (%) Market Share of BUKU II Banks (%)	<b>1.98</b>	2.71
DPK Third-Party Deposits	Industri Perbankan Banking Industry	<b>7,479,463</b>	6,665,390
	Bank BUKU II BUKU II Banks	<b>793,773</b>	648,871
	Bank Victoria*	<b>18,072</b>	18,080
	Pangsa Pasar Industri Perbankan (%) Market Share of Banking Industry (%)	<b>0.24</b>	0.27
	Pangsa Pasar Bank BUKU II (%) Market Share of BUKU II Banks (%)	<b>2.28</b>	2.79
Kredit yang Diberikan Loans	Industri Perbankan Banking Industry	<b>5,820,636</b>	5,547,618
	Bank BUKU II BUKU II Banks	<b>651,624</b>	539,011
	Bank Victoria*	<b>14,683</b>	13,676
	Pangsa Pasar Industri Perbankan (%) Market Share of Banking Industry (%)	<b>0.25</b>	0.25
	Pangsa Pasar Bank BUKU II (%) Market Share of BUKU II Banks (%)	<b>2.25</b>	2.54
<b>RASIO KEUANGAN / FINANCIAL RATIOS</b>		(dalam % / in %)	
NIM	Industri Perbankan Banking Industry	<b>4.51</b>	4.45
	Bank BUKU II BUKU II Banks	<b>3.74</b>	4.57
	Bank Victoria*	<b>2.36</b>	0.82
ROA	Industri Perbankan Banking Industry	<b>1.84</b>	1.59
	Bank BUKU II BUKU II Banks	<b>1.14</b>	1.31
	Bank Victoria*	<b>(0.71)</b>	(1.26)
LDR	Industri Perbankan Banking Industry	<b>77.13</b>	82.54
	Bank BUKU II BUKU II Banks	<b>81.26</b>	82.73
	Bank Victoria*	<b>81.25</b>	75.64
CAR	Industri Perbankan Banking Industry	<b>25.67</b>	23.89
	Bank BUKU II BUKU II Banks	<b>36.88</b>	24.57
	Bank Victoria*	<b>17.49</b>	16.68
BOPO	Industri Perbankan Banking Industry	<b>83.58</b>	86.58
	Bank BUKU II BUKU II Banks	<b>91.55</b>	91.71
	Bank Victoria*	<b>104.94</b>	112.09

\* Merupakan angka PT Bank Victoria International Tbk (Entitas Induk saja).  
\* The figure is for PT Bank Victoria International Tbk (Parent only).

Dengan kinerja yang dibukukan di tahun 2021, pangsa pasar Bank Victoria dibandingkan dengan industri perbankan nasional, sesuai data Statistik Perbankan Indonesia yang diterbitkan oleh Otoritas Jasa Keuangan, secara umum mengalami penurunan. Pangsa pasar Bank Victoria untuk industri perbankan pada tahun 2021 dari segi aset, DPK, maupun kredit yang diberikan masing-masing tercatat sebesar 0,23%, 0,24%, dan 0,25%.

Sedangkan, pangsa pasar Bank Victoria untuk Bank BUKU II pada tahun 2021 dari segi aset, DPK, maupun kredit yang diberikan masing-masing tercatat sebesar 1,98%, 2,28%, dan 2,25%, mengalami penurunan jika dibandingkan pangsa pasar tahun 2020 yang masing-masing tercatat 2,71%, 2,79%, dan 2,54%.

## Suku Bunga Dasar Bank

Penetapan suku bunga dasar Bank mengacu kepada rapat *Asset and Liability Committee* (ALCO) yang rutin diadakan setiap bulannya antara Direksi dengan Divisi yang terkait.

### Tingkat Suku Bunga Penghimpunan Dana Rata-Rata Setahun Annual Average Interest Rate of Funding

(dalam % / in %)

Uraian	2021	2020	Description
<b>Giro</b>			<b>Current Account</b>
Rupiah	3.85	4.85	Rupiah
Dolar Amerika Serikat	0.47	0.46	United States Dollar
<b>Tabungan</b>			<b>Savings</b>
Rupiah	4.55	4.76	Rupiah
Dolar Amerika Serikat	N/A	N/A	United States Dollar
<b>Deposito Berjangka</b>			<b>Time Deposits</b>
Rupiah	8.05	7.58	Rupiah
Dolar Amerika Serikat	2.78	2.48	United States Dollar

Bank juga menetapkan suku bunga dasar kredit (SBDK) sebagai dasar penetapan suku bunga kredit yang akan dikenakan kepada nasabah. SBDK belum memperhitungkan komponen estimasi premi risiko yang besarnya tergantung dari penilaian Bank terhadap risiko masing-masing debitur atau kelompok debitur. Dengan demikian, besarnya suku bunga kredit yang dikenakan kepada debitur belum tentu sama dengan SBDK.

With the performance recorded in 2021, Bank Victoria's market share compared to the national banking industry, according to Indonesian Banking Statistics data published by the Financial Services Authority, generally decreased. Bank Victoria's market share for the banking industry in 2021 in terms of assets, third-party deposits, and loans were recorded at 0.23%, 0.24% and 0.25%, respectively.

Whereas, Bank Victoria's market share for BUKU II Banks in 2021 in terms of assets, third-party deposits, and loans were recorded at 1.98%, 2.28% and 2.25%, respectively, experiencing a decline compared to the market share in 2020 which were recorded at 2.71%, 2.79%, and 2.54%, respectively.

## Bank's Prime Lending Rates

The determination of the Bank's prime interest rate refers to the Assets and Liabilities Committee (ALCO) meeting held regularly every month between the Board of Directors and the related Divisions.

The Bank also sets the prime lending rate (SBDK) as the basis for determining the loan interest rate that will be charged to customers. Prime Lending Rate does not calculate the risk premium estimation component, the amount of which depends on the Bank's assessment of the risk of each debtor or group of debtors. Thus, the amount of loan interest rate charged to debtors is not necessarily the same as the prime lending rate.

**Tingkat Suku Bunga Dasar Kredit Rupiah (Prime Lending Rate) per Tahun**  
Rupiah Prime Lending Rate per Year

(dalam % / in %)

Komponen <sup>1)</sup> Component <sup>1)</sup>	Kredit Korporasi <sup>2)</sup> Corporate Credit <sup>2)</sup>	Kredit Ritel <sup>2)</sup> Retail Credit <sup>2)</sup>	Kredit Mikro <sup>3)</sup> Micro Credit <sup>3)</sup>	Kredit Konsumsi <sup>2)</sup> Consumer Credit <sup>2)</sup>	
				KPR House Loan	Non-KPR <sup>4)</sup> Non-House Loan <sup>4)</sup>
<b>Harga Pokok Dana untuk Kredit (HPDK)</b> Cost of Funds for Loans (HPDK)					
Biaya Dana Cost of Funds	5.78	5.78	-	5.78	5.78
Biaya Dana Pihak Ketiga Cost of Third-Party Funds	4.80	4.80	-	4.80	4.80
Biaya Dana Bukan Pihak Ketiga Cost of Non-Third-Party Funds	0.98	0.98	-	0.98	0.98
Biaya Dana Liabilitas kepada Bank Lain Cost of Liability Funds to Other Banks	0.11	0.11	-	0.11	0.11
Biaya Dana Liabilitas kepada Bank Indonesia Cost of Liability Funds to Bank Indonesia	0.00	0.00	-	0.00	0.00
Biaya Dana Surat Berharga Cost of Securities Funds	0.87	0.87	-	0.87	0.87
Biaya Dana Pinjaman yang Diterima Cost of Borrowing Funds	0.00	0.00	-	0.00	0.00
Biaya Dana Liabilitas Antar Kantor Cost of Inter-Office Liability Funds	0.00	0.00	-	0.00	0.00
Biaya Dana Liabilitas Keuangan Permodalan Cost of Capital Finance Liability Funds	0.00	0.00	-	0.00	0.00
Biaya Dana Lainnya Cost of Other Funds	0.00	0.00	-	0.00	0.00
Biaya Promosi dan Pemasaran terkait Pendanaan Cost of Promotion and Marketing related to Funding	0.00	0.00	-	0.00	0.00
Lainnya Others	0.00	0.00	-	0.00	0.00
Biaya Jasa Cost of Services	0.03	0.03	-	0.03	0.03
Biaya Regulasi Cost of Regulations	0.34	0.34	-	0.34	0.34
Biaya GWM Cost of Statutory Reserve Requirement	0.14	0.14	-	0.14	0.14
Biaya Premi Penjaminan Lembaga Penjamin Simpanan Cost of Deposit Insurance Corporation Guarantee Premium	0.20	0.20	-	0.20	0.20
HPDK Lainnya Other HPDK	0.00	0.00	-	0.00	0.00
Biaya Kas Cost of Cash	0.00	0.00	-	0.00	0.00
Lainnya Others	0.00	0.00	-	0.00	0.00
<b>Biaya Overhead</b> Overhead Cost	<b>1.06</b>	<b>1.06</b>	-	<b>1.06</b>	<b>1.06</b>
Biaya Tenaga Kerja Labor Cost	0.72	0.72	-	0.72	0.72

Komponen <sup>1)</sup> Component <sup>1)</sup>	Kredit Korporasi <sup>2)</sup> Corporate Credit <sup>2)</sup>	Kredit Ritel <sup>2)</sup> Retail Credit <sup>2)</sup>	Kredit Mikro <sup>3)</sup> Micro Credit <sup>3)</sup>	Kredit Konsumsi <sup>2)</sup> Consumer Credit <sup>2)</sup>	
				KPR House Loan	Non-KPR <sup>4)</sup> Non-House Loan <sup>4)</sup>
Biaya Pendidikan dan Pelatihan Education and Training Cost	0.01	0.01	-	0.01	0.01
Biaya Penelitian dan Pengembangan Research and Development Cost	0.02	0.02	-	0.02	0.02
Biaya Sewa Rent Cost	0.05	0.05	-	0.05	0.05
Biaya Promosi dan Pemasaran Promotion and Marketing Cost	0.00	0.00	-	0.00	0.00
Cash Back	0.00	0.00	-	0.00	0.00
Hadiah Gifts	0.00	0.00	-	0.00	0.00
Iklan dan Promosi Advertising and Promotion	0.00	0.00	-	0.00	0.00
Sponsorship/Entertainment	0.00	0.00	-	0.00	0.00
Lainnya Others	0.00	0.00	-	0.00	0.00
Biaya Pemeliharaan dan Perbaikan Maintenance and Repair Cost	0.03	0.03	-	0.03	0.03
Biaya Penyusutan Aset Tetap dan Inventaris Depreciation of Fixed Asset and Inventory Cost	0.17	0.17	-	0.17	0.17
Biaya Overhead Lainnya Other Overhead Cost	0.06	0.06	-	0.06	0.06
Biaya Barang/Jasa dan Administrasi Goods/ Services and Administration Cost	0.06	0.06	-	0.06	0.06
Lainnya Others	0.00	0.00	-	0.00	0.00
<b>Margin Keuntungan</b> <b>Profit Margin</b>	<b>2.23</b>	<b>3.16</b>	<b>-</b>	<b>2.98</b>	<b>4.48</b>
<b>Suku Bunga Dasar Kredit (SBDK)</b> <b>Prime Lending Rate (SBDK)</b>	<b>9.44</b>	<b>10.37</b>	<b>-</b>	<b>10.19</b>	<b>11.69</b>
<b>Estimasi Premi Risiko</b> <b>Risk Premium Estimation</b>	<b>1.00</b>	<b>1.50</b>	<b>-</b>	<b>1.25</b>	<b>1.75</b>
<b>Suku Bunga Kredit (SBDK + Estimasi Premi Risiko)</b> <b>Loan Interest Rate (SBDK + Risk Premium Estimation)</b>	<b>10.44</b>	<b>11.87</b>	<b>-</b>	<b>11.44</b>	<b>13.44</b>

## Keterangan/Remarks:

<sup>1)</sup> Masing-masing komponen diisi sepanjang digunakan untuk membiayai kredit;

<sup>2)</sup> Penggolongan kredit korporasi, kredit ritel, dan kredit konsumsi (KPR dan Non-KPR) dilakukan berdasarkan kriteria yang ditetapkan oleh internal Bank;

<sup>3)</sup> Penggolongan kredit mikro berpedoman pada definisi usaha mikro; serta

<sup>4)</sup> Tidak termasuk kartu kredit dan kredit tanpa agunan (KTA).

<sup>1)</sup> Each component is filled in as long as it is used to finance credit;

<sup>2)</sup> The classification of corporate credit, retail credit, and consumer credit (House Loan and Non-House Loan) is carried out based on the criteria set by the Bank's internal party;

<sup>3)</sup> The classification of micro credit refers to the definition of micro business; and

<sup>4)</sup> Does not include credit cards and unsecured credit (KTA).

### Tingkat Suku Bunga Pinjaman Rata-Rata Setahun

#### Annual Average Interest Rate of Loans

(dalam % / in %)

Uraian	2021	2020	Description
Rupiah	11.52	10.84	Rupiah
Dolar Amerika Serikat	8.37	7.89	United States Dollar

## Tinjauan Segmen Usaha

### Penjelasan dan Kinerja Operasional Segmen Operasi

Segmen operasi Bank Victoria dibagi ke dalam segmen konvensional dan segmen syariah. Penjelasan tiap-tiap segmen diuraikan sebagai berikut.

#### 1. Segmen Konvensional

Segmen konvensional terdiri dari produk dan jasa berupa produk simpanan, produk pinjaman, dan jasa layanan.

##### a. Penghimpunan Dana (Simpanan)

Produk simpanan merupakan dana pihak ketiga yang berhasil dihimpun oleh Bank melalui berbagai produk tabungan, giro, dan deposito. Kinerja operasional produk simpanan Bank dalam 2 tahun terakhir diuraikan sebagai berikut.

#### Total Rekening Dana Pihak Ketiga

##### Total Accounts of Third-Party Deposits

(dalam unit rekening, kecuali dinyatakan lain / in account unit, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Tabungan	45,057	68.20	52,963	69.11	(14.93)	Savings
Giro	2,508	3.80	2,552	3.33	(1.72)	Current Account
Deposito Berjangka	18,503	28.01	21,120	27.56	(12.39)	Time Deposits
<b>Total</b>	<b>66,068</b>	<b>100.00</b>	<b>76,635</b>	<b>100.00</b>	<b>(13.79)</b>	<b>Total</b>

Selama tahun 2021, total rekening dana pihak ketiga yang berhasil dihimpun oleh Bank sebesar 66.068 unit rekening. Jumlah tersebut mengalami penurunan sebesar 10.567 unit rekening atau 13,79% jika dibandingkan tahun 2020 yang mencapai 76.635 unit rekening. Komposisi dana pihak ketiga Bank masih didominasi oleh produk tabungan dengan kontribusi mencapai 68,20%.

## Business Segment Overview

### Explanation and Operational Performance of Operating Segment

Bank Victoria's operating segment is divided into conventional segment and sharia segment. Explanation of each segment is described as follows.

#### 1. Conventional Segment

Conventional segment consists of products and services in the forms of savings products, lending products, and services.

##### a. Funding (Savings)

Savings products are third party deposits that have been collected by Bank Victoria through various savings products, current account, and time deposits. The operating performance of the Bank's savings products for the last 2 years is described below.

In 2021, the total accounts of third party deposits collected by the Bank amounted to 66,068 account units. This number increased/decreased by 10,567 account units or 13.79% when compared to in 2020 which reached 76,635 account units. The composition of the Bank's third party deposits was still dominated by saving products with a contribution reaching 68.20%.

#### Total Dana Pihak Ketiga

##### Total Third-Party Deposits

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Tabungan	3,138,292	17.37	2,400,501	13.28	30.73	Savings
Giro	1,314,082	7.27	1,331,371	7.36	(1.30)	Current Account
Deposito Berjangka	13,619,567	75.36	14,348,212	79.36	(5.08)	Time Deposits
<b>Total</b>	<b>18,071,942</b>	<b>100.00</b>	<b>18,080,084</b>	<b>100.00</b>	<b>(0.05)</b>	<b>Total</b>

Dari sisi jumlah dana, Bank Victoria berhasil menghimpun dana pihak ketiga mencapai Rp18,07 triliun pada akhir tahun 2021, menurun 0,05% atau sebesar Rp8,14 juta dari tahun sebelumnya sebesar Rp18,08 triliun. Penurunan tersebut utamanya disebabkan oleh deposito.

#### Tabungan

Kinerja operasional produk tabungan Bank dalam 2 tahun terakhir diuraikan sebagai berikut.

#### Total Rekening Produk Tabungan Total Accounts of Savings Products

(dalam unit rekening, kecuali dinyatakan lain / in account unit, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pihak Ketiga	44,863	99.57	52,762	99.62	(14.97)	Third Parties
Pihak Berelasi	194	0.43	201	0.38	(3.48)	Related Parties
<b>Total</b>	<b>45,057</b>	<b>100.00</b>	<b>52,963</b>	<b>100.00</b>	<b>(14.93)</b>	<b>Total</b>

Total rekening produk tabungan Bank Victoria mengalami penurunan sebesar 7.906 unit rekening atau sebesar 14,93% dari 52.963 unit rekening di tahun 2020 menjadi 45.057 unit rekening di tahun 2021. Komposisi produk tabungan Bank Victoria didominasi oleh tabungan pihak ketiga dengan kontribusi mencapai 99,57%.

The total number of savings accounts of Bank Victoria decreased by 7,906 unit account units or 14.93% from 52,963 unit account units in 2020 to 45,057 unit account units in 2021. The composition of Bank Victoria's savings products was dominated by third parties savings with a contribution reaching 99.57%.

#### Total Dana Produk Tabungan Total Funds of Savings Products

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pihak Ketiga	3,109,978	99.10	2,358,466	98.25	31.86	Third Parties
Pihak Berelasi	28,314	0.90	42,035	1.75	(32.64)	Related Parties
<b>Total</b>	<b>3,138,292</b>	<b>100.00</b>	<b>2,400,501</b>	<b>100.00</b>	<b>30.73</b>	<b>Total</b>

Sementara dari sisi nilai, total dana produk tabungan yang dibukukan oleh Bank pada tahun 2021 mencapai Rp3,14 triliun, meningkat 30,73% atau setara Rp737,79 miliar dibandingkan dengan tahun 2020 yang mencapai Rp2,40 triliun. Peningkatan tersebut khususnya berasal dari tabungan pihak ketiga.

Whereas, in terms of amount, the total amount of savings products recorded by the Bank in 2021 reached Rp3.14 trillion, increasing by 30.73% or equivalent to Rp737.79 billion compared to in 2020 which reached Rp2.40 trillion. The increase in particular came from third parties savings.

#### Giro

Kinerja operasional produk giro Bank dalam 2 tahun terakhir diuraikan sebagai berikut.

#### Current Account

The operating performance of the Bank's current account products for the last 2 years is as described below.



**Total Rekening Produk Giro**  
Total Accounts of Current Account Products

(dalam unit rekening, kecuali dinyatakan lain / in account unit, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pihak Ketiga	2,407	95.97	2,460	96.39	(2.15)	Third Parties
Pihak Berelasi	101	4.03	92	3.61	9.78	Related Parties
<b>Total</b>	<b>2,508</b>	<b>100.00</b>	<b>2,552</b>	<b>100.00</b>	<b>(1.72)</b>	<b>Total</b>

Pada tahun 2021, total rekening produk giro mencatatkan penurunan sebesar 1,72% atau sebanyak 44 unit rekening dari 2.552 unit rekening pada tahun 2020 menjadi 2.508 unit rekening pada tahun 2021. Komposisi produk giro Bank Victoria didominasi oleh giro pada pihak ketiga dengan kontribusi mencapai 95,97%.

In 2021, the total number of current account products recorded a decrease of 1.72% or as many as 44 unit account units from 2,552 unit account units in 2020 to 2,508 unit account units in 2021. The composition of Bank Victoria's current account products was dominated by third parties current account with a contribution reaching 95.97%.

**Total Dana Produk Giro**  
Total Funds of Current Account Products

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pihak Ketiga	1,238,062	94.21	1,310,750	98.45	(5.55)	Third Parties
Pihak Berelasi	76,020	5.79	20,621	1.55	268.65	Related Parties
<b>Total</b>	<b>1,314,082</b>	<b>100.00</b>	<b>1,331,371</b>	<b>100.00</b>	<b>(1.30)</b>	<b>Total</b>

Sejalan dengan penurunan total rekening giro, dana produk giro pada tahun 2021 turut mengalami penurunan sebesar 1,30% dari Rp1,33 triliun di tahun 2020 menjadi Rp1,31 triliun di tahun 2021. Penurunan tersebut dipengaruhi oleh giro pada pihak ketiga.

In line with the decrease in total current accounts, the amount of current account in 2021 also decreased by 1.30% from Rp1.33 trillion in 2020 to Rp1.31 trillion in 2021. The decrease was affected by third parties current account.

**Deposito Berjangka**

Kinerja operasional produk deposito berjangka Bank Victoria dalam 2 tahun terakhir diuraikan sebagai berikut.

**Time Deposits**

The operating performance of Bank Victoria's time deposits products for the last 2 years is described below.

**Total Rekening Produk Deposito Berjangka**  
Total Accounts of Time Deposits Products

(dalam unit rekening, kecuali dinyatakan lain / in account unit, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
1 bulan	10,128	54.74	10,123	47.93	0.05	1 month
3 bulan	5,579	30.15	7,952	37.65	(29.84)	3 month
6 bulan	1,899	10.26	2,142	10.14	(11.34)	6 month
12 bulan	897	4.85	903	4.28	(0.66)	12 month
<b>Total</b>	<b>18,503</b>	<b>100.00</b>	<b>21,120</b>	<b>100.00</b>	<b>(12.39)</b>	<b>Total</b>

Hingga akhir tahun 2021, total rekening produk deposito berjangka yang berhasil diakumulasikan oleh Bank mencapai 18.503 unit rekening dibandingkan tahun 2020 yang sebesar 21.120 unit rekening, terjadi penurunan 12,39% atau sebesar 2.617 unit rekening. Penurunan tersebut sebagian besar pada deposito berjangka waktu 3 bulan, yaitu mencapai 29,84% dari total deposito berjangka.

Until the end of 2021, the total accounts of time deposits accumulated by the Bank reached 18,503 unit account units. Compared to in 2020 which amounted to 21,120 unit account units, there was a decrease of 12.39% or equal to 2,617 unit account units. Most of the time deposits are 3 month, which contributed 29.84% of the total time deposits.

#### Total Dana Produk Deposito Berjangka Total Funds of Time Deposits Products

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
<i>Deposito on Call</i>	<b>274,680</b>	2.02	457,007	3.19	(39.90)	Deposito on Call
1 bulan	<b>6,321,131</b>	46.41	5,675,663	39.56	11.37	1 month
3 bulan	<b>4,592,228</b>	33.72	5,570,086	38.82	(17.56)	3 month
6 bulan	<b>1,644,456</b>	12.07	1,809,222	12.60	(9.11)	6 month
12 bulan	<b>787,072</b>	5.78	836,234	5.83	(5.88)	12 month
<b>Total</b>	<b>13,619,567</b>	<b>100.00</b>	<b>14,348,212</b>	<b>100.00</b>	<b>(5.08)</b>	<b>Total</b>

Sedangkan, total dana produk deposito berjangka tercatat sebesar Rp13,62 triliun pada akhir tahun 2021, mengalami penurunan sebesar 5,08% atau setara Rp728,65 miliar dibandingkan Rp14,35 triliun pada akhir tahun 2020. Menurunnya dana produk deposito berjangka disebabkan oleh *deposito on call*.

Whereas, the total amount of time deposits was recorded at Rp13.62 trillion at the end of 2021, a decrease of 5.08% or equivalent to Rp728.65 billion compared to Rp14.35 trillion at the end of 2020. The decrease in the total amount of time deposits was contributed by *deposito on call*.

#### b. Penyaluran Dana (Pinjaman)

Produk pinjaman merupakan pemberian kredit kepada pihak ketiga, baik perorangan maupun perusahaan. Pelaksanaan pemberian kredit dilakukan dengan tetap memperhatikan prinsip kehati-hatian dan prosedur perkreditan yang sehat. Kinerja produk pinjaman sepanjang tahun 2021 diuraikan sebagai berikut.

#### b. Lending (Loans)

Loan products are credit provision to third parties, either individual or company. The provision of loans is carried out with due regard to the prudential principles and sound credit procedures. Loan product performance in 2021 is described as follows.

#### Produk Pinjaman berdasarkan Pihak Loan Products by Parties

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pihak Ketiga	<b>14,464,687</b>	98.51	13,439,966	98.27	7.62	Third Parties
Pihak Berelasi	<b>218,419</b>	1.49	236,417	1.73	(7.61)	Related Parties
<b>Total</b>	<b>14,683,105</b>	<b>100.00</b>	<b>13,676,383</b>	<b>100.00</b>	<b>7.36</b>	<b>Total</b>

Sepanjang tahun 2021, Bank Victoria menyalurkan pinjaman sebesar Rp14,68 triliun meningkat 7,36% atau Rp1,01 triliun dibandingkan tahun 2020 yang mencapai Rp13,68 triliun. Kondisi ini terutama dipengaruhi oleh meningkatnya pinjaman pihak ketiga sebesar 7,62%

Throughout 2021, Bank Victoria disbursed loans of Rp14.68 trillion, an increase of 7.36% or Rp1.01 trillion compared to in 2020 which was Rp13.68 trillion. This condition was mainly influenced by the increase in third party loans by 7.62% from previously Rp13.44 trillion to Rp14.46 trillion. The composition

dari sebelumnya Rp13,44 triliun menjadi Rp14,46 triliun. Komposisi produk pinjaman berdasarkan pihak pada tahun 2021 didominasi oleh pinjaman pihak ketiga sebesar 98,51% dari total pinjaman.

of loan products by party in 2021 was dominated by third party loans contributing 98.51% of the total loans.

**Produk Pinjaman berdasarkan Jenis Pinjaman**  
**Loan Products by Types of Loans**

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pinjaman Tetap	9,336,405	63.59	10,289,271	75.24	(9.26)	Fixed Loans
Pinjaman Konsumen	161,842	1.10	194,651	1.42	(16.86)	Consumer Loans
Pinjaman Rekening Koran	1,510,730	10.29	1,026,066	7.50	47.24	Overdraft
Pinjaman Tetap dengan Angsuran	3,627,712	24.71	2,103,021	15.38	72.50	Fixed Loans with Installments
Pinjaman Serba Guna	46,416	0.32	63,373	0.46	(26.76)	Multipurpose Loans
<b>Total</b>	<b>14,683,105</b>	<b>100.00</b>	<b>13,676,383</b>	<b>100.00</b>	<b>7.36</b>	<b>Total</b>

Berdasarkan jenis pinjaman, penyaluran pinjaman yang dilakukan Bank pada tahun 2021 didominasi oleh pinjaman tetap yaitu sebesar Rp9,34 triliun atau setara 63,59%, kemudian diikuti dengan pinjaman tetap dengan angsuran yaitu sebesar Rp3,63 triliun atau setara 24,71%. Sedangkan yang terendah adalah pinjaman serba guna yaitu sebesar Rp46,42 miliar atau setara 0,32% dari total pinjaman.

Based on type of loan, loan disbursed by the Bank in 2021 was dominated by fixed loans of Rp9.34 trillion or equivalent to 63.59%, followed by fixed loans with installments of Rp3.63 trillion or equivalent to 24.71%. Whereas, the lowest was multipurpose loans, which amounted to Rp46.42 billion or 0.32% of the total loans.

**Produk Pinjaman berdasarkan Sektor Ekonomi**  
**Loan Products by Economic Sector**

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Lembaga Pembiayaan	3,013,384	20.52	2,189,724	16.00	37.61	Financing Institution
Perdagangan, Restoran dan Hotel	3,435,922	23.40	3,126,102	22.86	9.91	Trading, Restaurant, and Hotel
Industri	1,565,012	10.66	1,460,490	10.68	7.16	Industry
Real Estate	2,572,483	17.52	3,228,429	23.61	(20.32)	Real Estate
Konstruksi	1,104,130	7.52	707,891	5.18	55.97	Construction
Jasa-jasa Sosial/ Masyarakat	506,249	3.45	662,698	4.85	(23.61)	Social/Community Services
Lain-lain	2,485,925	16.93	2,301,049	16.82	8.03	Others
<b>Total</b>	<b>14,683,105</b>	<b>100.00</b>	<b>13,676,383</b>	<b>100.00</b>	<b>7.36</b>	<b>Total</b>

Berdasarkan sektor ekonomi, kontribusi penyaluran kredit terbesar pada tahun 2021 berasal dari sektor perdagangan, restoran dan hotel sebesar 23,40% dan sektor lembaga pembiayaan sebesar 20,52%, kemudian diikuti oleh sektor *real estate* sebesar 17,52%. Sedangkan, kontribusi

Based on the economic sector, the largest contribution of loans in 2021 came from the trading, restaurant, and hotel sector at 23.40%, followed by the financing institution sector at 20.52%, and the real estate sector at 17.52%. While, the largest loan contribution in 2020 came from the real estate sector at

penyaluran kredit terbesar pada tahun 2020 berasal dari sektor *real estate* sebesar 23,61% dan sektor perdagangan, restoran dan hotel sebesar 22,86%, kemudian diikuti oleh sektor lain-lain sebesar 16,82%.

23.61%, the trading, restaurant, and hotel sector at 22.86%, then followed by the financing institution sector at 16.82%.

### Produk Pinjaman UMKM MSME Loan Products

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Usaha Mikro	-	0.00	-	0.00	0.00	Micro Business
Usaha Kecil	28,950	1.44	38,014	2.54	(23.84)	Small Business
Usaha Menengah	1,985,229	98.56	1,456,616	97.46	36.29	Medium Business
<b>Total</b>	<b>2,014,179</b>	<b>100.00</b>	<b>1,494,630</b>	<b>100.00</b>	<b>34.76</b>	<b>Total</b>

Bank menyalurkan pinjaman untuk UMKM pada tahun 2021 sebesar Rp2,01 triliun, mengalami peningkatan 34,76% atau Rp519,55 miliar dibandingkan tahun 2020 yang mencapai Rp1,49 triliun. Pinjaman yang disalurkan kepada usaha menengah memiliki porsi terbesar, yaitu 98,56%, disusul usaha kecil sebesar 1,44%.

The Bank disbursed loans to MSMEs in 2021 amounting to Rp2.01 trillion, an increase of 34.76% or Rp519.55 billion compared to in 2020 which reached Rp1.49 trillion. Loans disbursed to medium business have the largest portion, namely 98.56% followed by small business of 1.44%.

### Jasa Layanan

Bank Victoria memberikan berbagai layanan penunjang yang bertujuan untuk memudahkan nasabah dalam melakukan transaksi perbankan. Pada tahun 2021, kinerja operasional dari layanan perbankan Bank Victoria diuraikan sebagai berikut.

### Services

Bank Victoria provides a variety of supporting services aimed at facilitating customers in conducting banking transactions. In 2021, the operational performance of Bank Victoria's banking services was as described below.

### Layanan Keuangan Financial Services

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Kliring	47,358	2.10	725,597	15.50	(93.47)	Clearing
Postpaid	10,491	0.47	692	0.01	1,416.04	Postpaid
Prepaid	8	0.00	8	0.00	0.00	Prepaid
Pembayaran Telkom	134	0.01	3,301	0.07	(95.94)	Telkom Payment
Pembayaran Gaji Karyawan	35	0.00	354,869	7.58	(99.99)	Employees' Salary Payments
ATM Victoria	2,194,921	97.42	3,596,874	76.83	(38.98)	ATM Victoria
<b>Total</b>	<b>2,252,947</b>	<b>100.00</b>	<b>4,681,341</b>	<b>100.00</b>	<b>(51.87)</b>	<b>Total</b>

Pada tahun 2021, jasa layanan keuangan Bank membukukan kinerja sebesar Rp2,25 triliun, tercatat menurun sebesar 51,87% dibandingkan dengan tahun 2020 yang mencapai Rp4,68 triliun. Penurunan tersebut khususnya berasal dari layanan ATM Victoria yang menurun sebesar 38,98%.

In 2021, the Bank's financial services recorded a performance of Rp2.25 trillion, a decrease of 51.87% compared to in 2020 which reached Rp4.68 trillion. The decrease was mainly due to ATM Victoria services which decreased by 38.98%.

## Layanan Bank Devisa

## Foreign Exchange Bank Services

### Total Rekening Dana Pihak Ketiga Layanan Bank Devisa

#### Total Third-Party Accounts for Foreign Exchange Bank Services

(dalam unit rekening, kecuali dinyatakan lain / in account unit, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Giro	649	65.36	637	63.96	1.88	Current Account
Deposito Berjangka	344	34.64	359	36.04	(4.18)	Time Deposits
<b>Total</b>	<b>993</b>	<b>100.00</b>	<b>996</b>	<b>100.00</b>	<b>(0.30)</b>	<b>Total</b>

Total rekening dana pihak ketiga dari layanan bank devisa di tahun 2021 mencapai 993 unit rekening, menurun 0,30% dibanding tahun 2020 sebesar 996 unit rekening. Penurunan tersebut disebabkan oleh deposito berjangka.

Total third-party accounts from foreign exchange bank services in 2021 reached 993 unit account units, an increase of 0.30% compared to on 2020 amounting to 996 unit account units. The decrease was due to time deposits.

### Total Dana Pihak Ketiga Layanan Bank Devisa

#### Total Third-Party Deposits for Foreign Exchange Bank Services

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Giro	94,053	13.38	129,620	31.08	(27.44)	Current Account
Deposito Berjangka	608,626	86.62	287,371	68.92	111.79	Time Deposits
<b>Total</b>	<b>702,678</b>	<b>100.00</b>	<b>416,991</b>	<b>100.00</b>	<b>68.51</b>	<b>Total</b>

Total dana pihak ketiga layanan bank devisa tahun 2021 tercatat sebesar Rp702,68 miliar, meningkat 68,51% atau sebesar Rp285,69 miliar dibandingkan dengan tahun 2020 sebesar Rp416,99 miliar. Peningkatan tersebut berasal dari deposito berjangka yang meningkat signifikan sebesar 111,79% atau setara 321,26 miliar.

Total amount of third-party deposits from foreign exchange bank services in 2021 amounted to Rp702.68 billion, an increase of 68.51% or Rp285.69 billion compared to that of 2020 of Rp416.99 billion. The increase came from time deposits, which increased significantly by 111.79% or equal to Rp321.26 billion.

## 2. Segmen Syariah

Bank Victoria memiliki segmen bisnis syariah yang dijalankan oleh Entitas Anak dari Bank Victoria yang bernama Bank Victoria Syariah. Sama halnya dengan segmen konvensional, segmen syariah memiliki produk dan jasa berupa simpanan, produk pinjaman, dan jasa layanan.

### a. Penghimpunan Dana (Simpanan)

Produk simpanan di Bank Victoria Syariah terdiri dari dana pihak ketiga yang dihimpun dari berbagai produk tabungan, giro, dan deposito yang dijalankan dengan prinsip-prinsip perbankan syariah.

## 2. Sharia Segment

Bank Victoria has a sharia business segment that is conducted by Bank Victoria' Subsidiary, namely Bank Victoria Syariah. Similar to the conventional segment, the sharia segment has products and services in the form of deposits, loans, and services.

### a. Funding (Savings)

Savings products at Bank Victoria Syariah consist of third-party deposits, which are collected from various savings, current account, and time deposits products, which are conducted under the principles of Islamic banking.

**Total Rekening Dana Pihak Ketiga – Syariah**  
**Total Accounts of Third-Party Deposit – Sharia**

(dalam unit rekening, kecuali dinyatakan lain / in account unit, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
<b>TABUNGAN MUDHARABAH / MUDHARABAH SAVINGS DEPOSITS</b>						
Pihak Ketiga	1,603	75.15	2,580	73.29	(37.87)	Third Parties
Pihak Berelasi	53	2.48	43	1.22	23.26	Related Parties
<b>Total Tabungan Mudharabah</b>	<b>1,656</b>	<b>77.64</b>	<b>2,623</b>	<b>74.52</b>	<b>(36.87)</b>	<b>Total Mudharabah Savings Deposits</b>
<b>GIRO MUDHARABAH / MUDHARABAH CURRENT ACCOUNT</b>						
Pihak Ketiga	-	0.00	253	7.19	(100.00)	Third Parties
Pihak Berelasi	1	0.05	3	0.09	(66.67)	Related Parties
<b>Total Giro Mudharabah</b>	<b>1</b>	<b>0.05</b>	<b>256</b>	<b>7.27</b>	<b>(99.61)</b>	<b>Total Mudharabah Current Account</b>
<b>DEPOSITO BERJANGKA / TIME DEPOSITS</b>						
1 bulan	307	14.39	391	11.11	(21.48)	1 months
3 bulan	78	3.66	112	3.18	(30.36)	3 months
6 bulan	53	2.48	104	2.95	(49.04)	6 months
12 bulan	38	1.78	34	9.66	11.76	12 months
<b>Total Deposito Berjangka</b>	<b>476</b>	<b>22.32</b>	<b>641</b>	<b>18.21</b>	<b>(25.74)</b>	<b>Total Time Deposits</b>
<b>Total Dana Pihak Ketiga</b>	<b>2,133</b>	<b>100.00</b>	<b>3,520</b>	<b>100.00</b>	<b>(39.40)</b>	<b>Total Third Party Deposits</b>

Total rekening dana pihak ketiga segmen syariah pada tahun 2021 menurun sebesar 39,40% menjadi 2.133 unit rekening, dibandingkan tahun 2020 sebesar 3.520 unit rekening. Menurunnya total rekening dana pihak ketiga segmen syariah disebabkan oleh produk tabungan *mudharabah* yang mengalami penurunan sebesar 36,87% atau 967 unit rekening karena adanya penutupan 2 (dua) kantor cabang yaitu Kantor Cabang Denpasar dan Kantor Cabang Cirebon.

The number of third-party deposits of sharia segment in 2021 decreased by 39.40% to 2,133 accounts, compared to that of 2020 of 3,520 accounts. The decrease in the number of third-party deposits in sharia segment was due to mudharabah savings products, which decreased by 36.87% or 967 account units due to the closure of 2 (two) branch offices, namely Denpasar Branch Office and Cirebon Branch Office.

**Total Dana Pihak Ketiga**  
**Total Third-Party Deposits**

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
<b>TABUNGAN MUDHARABAH / MUDHARABAH SAVINGS DEPOSITS</b>						
Pihak Ketiga	19,944	1.63	40,946	2.97	(51.29)	Third Parties
Pihak Berelasi	307	0.03	268	0.02	14.58	Related Parties
<b>Total Tabungan Mudharabah</b>	<b>20,251</b>	<b>1.66</b>	<b>41,214</b>	<b>2.99</b>	<b>(50.86)</b>	<b>Total Mudharabah Savings Deposits</b>
<b>GIRO MUDHARABAH / MUDHARABAH CURRENT ACCOUNT</b>						
Pihak Ketiga	-	0.00	5	0.00	(100.00)	Third Parties
Pihak Berelasi	9	0.00	9	0.00	0.00	Related Parties
<b>Total Giro Mudharabah</b>	<b>9</b>	<b>0.00</b>	<b>14</b>	<b>0.00</b>	<b>(36.81)</b>	<b>Total Mudharabah Current Account</b>
<b>DEPOSITO BERJANGKA / TIME DEPOSITS</b>						
1 bulan	606,290	49.61	452,576	32.81	33.96	1 months
3 bulan	292,944	23.97	466,524	33.83	(37.21)	3 months

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
6 bulan	57,394	4.70	217,859	15.80	(73.66)	6 months
12 bulan	245,105	20.06	200,995	14.57	21.95	12 months
<b>Total Deposito Berjangka</b>	<b>1,210,733</b>	<b>98.34</b>	<b>1,337,954</b>	<b>97.01</b>	<b>(10.18)</b>	<b>Total Time Deposits</b>
<b>Total Dana Pihak Ketiga</b>	<b>1,221,993</b>	<b>100.00</b>	<b>1,379,182</b>	<b>100.00</b>	<b>(11.40)</b>	<b>Total Third Party Deposits</b>

Total dana pihak ketiga segmen syariah pada tahun 2021 tercatat sebesar Rp1,22 triliun, menurun sebesar 11,40% dibandingkan tahun 2020 sebesar Rp1,38 triliun. Penurunan tersebut disebabkan oleh menurunnya produk tabungan sebesar 50,86% atau Rp20,96 miliar, produk giro sebesar 36,81% atau Rp5,22 juta, dan produk deposito berjangka sebesar 10,18% atau Rp136,22 miliar.

Total amount of third-party deposits in sharia segment in 2021 was recorded at Rp1.22 trillion, a decrease of 11.40% compared to in 2020 which was Rp1.38 trillion. The decrease was due to the decrease in savings products by 50.86% or Rp20.96 billion, current account by 36.81% or Rp5.22 million, and time deposits by 10.18% or Rp136.22 billion.

**b. Penyaluran Dana (Pinjaman)**

**b. Lending (Loans)**

**Produk Pembiayaan  
Financing Products**

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
<b>UMKM</b>	<b>216,287</b>	<b>26.84</b>	<b>287,750</b>	<b>24.66</b>	<b>(24.83)</b>	<b>MSME</b>
Usaha Mikro	34	0.00	397	0.03	(91.44)	Micro Business
Usaha Kecil	10,339	1.28	11,370	0.97	(9.07)	Small Business
Usaha Menengah	205,914	25.55	275,982	23.65	(25.39)	Medium Business
<b>Non-UMKM</b>	<b>589,699</b>	<b>73.16</b>	<b>879,222</b>	<b>75.34</b>	<b>(32.93)</b>	<b>Non-MSME</b>
<b>Total</b>	<b>805,986</b>	<b>100.00</b>	<b>1,166,972</b>	<b>100.00</b>	<b>(30.93)</b>	<b>Total</b>

Produk pembiayaan segmen syariah terbagi antara UMKM dan non-UMKM. Produk pembiayaan pada tahun 2021 tercatat sebesar Rp805,99 miliar, menurun 30,93% dibanding tahun 2020 sebesar Rp1,17 triliun. Penurunan produk pembiayaan segmen syariah bersumber dari adanya pelunasan dan pembayaran rutin debitur.

Financing products of sharia segment are divided between MSME and non-MSME. Financing products in 2021 were recorded at Rp805.99 billion, a decrease of 30.93% compared to that of 2020 of Rp1.17 trillion. The decrease in financing products of sharia segment was due to the full repayment and routine repayments of debtors.

**c. Layanan Keuangan**

**c. Financial Services**

**Jasa Layanan  
Services**

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Bank Garansi	1,349	100.00	2,532	100.00	(46.72)	Bank Guarantee
<b>Total</b>	<b>1,349</b>	<b>100.00</b>	<b>2,532</b>	<b>100.00</b>	<b>(46.72)</b>	<b>Total</b>



Pada tahun 2021, jasa layanan syariah menurun 46,72% atau setara Rp1,18 miliar dari Rp2,53 miliar menjadi Rp1,35 miliar.

In 2021, sharia services decreased by 46.72% or equivalent to Rp1.18 billion from Rp2.53 billion to Rp1.35 billion.

## Kinerja Jaringan Kantor dan Karyawan

Bank Victoria selalu berupaya menjaga komposisi karyawan dengan baik. Hal tersebut selaras dengan Misi Bank Victoria yaitu mengembangkan sumber daya manusia yang profesional, berprinsip dan berdedikasi untuk memberikan layanan serta memenuhi kebutuhan nasabah.

## Performance of Office Network and Employee

Bank Victoria always strives to maintain employee composition properly. This is in line with Bank Victoria's Mission to develop professional, principled, and dedicated human resources to provide services and meet customer needs.

### Jaringan Kantor Office Network

(dalam unit, kecuali dinyatakan lain / in unit, unless stated otherwise)

Uraian	2021	Komposisi Composition (%)	2020	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Kantor Pusat	1	2.50	1	1.85	0.00	Head Office
Kantor Cabang	14	35.00	14	25.93	0.00	Branch Offices
Kantor Cabang Pembantu	25	62.50	38	70.37	(34.21)	Sub-branch Offices
Jaringan Kantor Lain (Kantor Kas, <i>Payment Point</i> , dan lainnya)	-	0.00	1	1.85	(100.00)	Other Office Network (Cash Office, <i>Payment Point</i> , and others)
<b>Total</b>	<b>40</b>	<b>100.00</b>	<b>54</b>	<b>100.00</b>	<b>(25.93)</b>	<b>Total</b>

Pada tahun 2021, total jaringan kantor Bank Victoria mencapai 39 kantor, mengalami penurunan jika dibandingkan dengan tahun sebelumnya sebanyak 53 kantor. Sedangkan, total karyawan Bank pada tahun 2021 tercatat sebanyak 694 orang, menurun dibandingkan tahun sebelumnya yang mencapai 799 orang.

In 2021, Bank Victoria's total office network reached 39 offices, a decrease from 53 offices in the previous year. Whereas, the Bank's total employees in 2021 were recorded at 694 people, a decrease compared to that of previous year, which reached 799 people.

## Pendapatan dan Profitabilitas

Segmen operasi Bank Victoria dibagi berdasarkan segmen usaha yang terdiri dari konvensional yaitu Bank Victoria dan syariah yaitu Bank Victoria Syariah. Kinerja dari masing-masing segmen usaha tersebut diuraikan sebagai berikut.

## Revenue and Profitability

Bank Victoria's operating segments are divided by business segments consisting of conventional segment, which is Bank Victoria, and sharia segment, which is Bank Victoria Syariah. The performance of each business segment is described as follows.

**Segmen Usaha**  
Business Segment

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	Konvensional	Syariah	Eliminasi Elimination	Total	Description
<b>2021</b>					
Pendapatan Bunga dan Syariah - Neto	418,200	45,454	-	463,654	Interest and Sharia Income - Net
Pendapatan Operasional Lainnya	430,649	27,801	(4,520)	453,929	Other Operating Income
Beban Operasi Lainnya	(943,567)	(61,001)	-	(1,004,569)	Other Operating Expenses
(Rugi)/Laba Operasional	(94,719)	12,254	(4,520)	(86,985)	(Loss)/Income From Operations
<b>Total Aset</b>	<b>23,659,941</b>	<b>1,658,424</b>	<b>(371,223)</b>	<b>24,947,143</b>	<b>Total Assets</b>
<b>Total Liabilitas</b>	<b>20,648,875</b>	<b>66,970</b>	<b>13,619</b>	<b>20,702,226</b>	<b>Total Liabilities</b>
<b>2020</b>					
Pendapatan Bunga dan Syariah - Neto	153,152	36,506	-	189,658	Interest and Sharia Income - Net
Pendapatan Operasional Lainnya	476,262	14,529	215	491,005	Other Operating Income
Beban Operasi Lainnya	(880,557)	(47,796)	(0)	(928,353)	Other Operating Expenses
(Rugi)/Laba Operasional	(251,143)	3,239	215	(247,689)	(Loss)/Income from Operations
<b>Total Aset</b>	<b>24,279,916</b>	<b>2,295,413</b>	<b>(353,921)</b>	<b>26,221,407</b>	<b>Total Assets</b>
<b>Total Liabilitas</b>	<b>21,662,014</b>	<b>536,673</b>	<b>(837)</b>	<b>22,197,850</b>	<b>Total Liabilities</b>
<b>KENAIKAN (PENURUNAN) (%) / INCREASE (DECREASE) (%)</b>					
Pendapatan Bunga dan Syariah - Neto	173.06	24.51	-	144.47	Interest and Sharia Income - Net
Pendapatan Operasional Lainnya	(9.58)	91.35	(2,206.22)	(7.55)	Other Operating Income
Beban Operasi Lainnya	7.16	27.63	(100.00)	8.21	Other Operating Expenses
(Rugi)/Laba Operasional	(62.28)	278.32	(2,206.32)	(64.88)	(Loss)/Income from Operations
<b>Total Aset</b>	<b>(2.55)</b>	<b>(27.75)</b>	<b>4.89</b>	<b>(4.86)</b>	<b>Total Assets</b>
<b>Total Liabilitas</b>	<b>(4.68)</b>	<b>(87.52)</b>	<b>1,526.97</b>	<b>(6.74)</b>	<b>Total Liabilities</b>

Pendapatan bunga dan syariah neto segmen konvensional pada akhir tahun 2021 mencapai Rp418,20 miliar, mengalami peningkatan signifikan sebesar 173,06% dibandingkan dengan tahun 2020 mencapai Rp153,15 miliar. Sedangkan, pendapatan bunga dan syariah neto segmen syariah mencapai Rp45,45 miliar, meningkat 24,51% dibandingkan dengan tahun 2020 yang mencapai Rp36,51 miliar.

Pendapatan operasional lainnya segmen konvensional pada tahun 2021 mencapai Rp430,65 miliar, menurun 9,58% dibandingkan dengan tahun 2020 sebesar Rp476,26 miliar. Sedangkan, pendapatan operasional lainnya segmen syariah mencapai Rp27,80 miliar, meningkat 91,35% dibandingkan dengan tahun 2020 yang mencapai Rp14,53 miliar.

Dari segi profitabilitas, terjadi peningkatan pada segmen konvensional sebesar 62,28% dari sebelumnya mengalami rugi Rp251,14 miliar menjadi rugi Rp94,72 miliar. Profitabilitas pada segmen syariah turut mengalami pertumbuhan sebesar 278,32% menjadi Rp12,25 miliar dari sebelumnya sebesar Rp3,24 miliar.

Meskipun profitabilitas mengalami perbaikan, namun total aset dan liabilitas di segmen konvensional per akhir tahun 2021 mengalami penurunan masing-masing sebesar 2,55%

The net interest and sharia income of conventional segment in 2021 reached Rp418.20 billion, a significant increase of 173.06% compared to Rp153.15 billion in 2020. Whereas, net interest and sharia income of sharia segment reached Rp45.45 billion, an increase of 24.51% compared to that of 2020 of Rp36.51 billion.

Other operating income of conventional segment in 2021 reached Rp430.65 billion, a decrease of 9.58% compared to Rp476.26 billion in 2020. While other operating income of sharia segment reached Rp27.80 billion, an increase of 91.35% compared to Rp14.53 billion in 2020.

In terms of profitability, there was an increase in the conventional segment by 62.28% from previously a loss of Rp251.14 billion to a loss of Rp94.72 billion. Profitability in sharia segment also grew by 278.32% to Rp12.25 billion from previously Rp3.24 billion.

Even though the profitability increased, the total assets and liabilities in conventional segment at the end of 2021 decreased by 2.55% or Rp619.98 billion and 4.68% or Rp1.01

atau Rp619,98 miliar dan 4,68% atau Rp1,01 triliun. Sementara itu, di segmen syariah, aset dan liabilitas pada tahun 2021 menurun masing sebesar 27,75% dan 87,52%.

trillion, respectively. Meanwhile, in sharia segment, assets and liabilities in 2021 decreased by 27.75% and 87.52%, respectively.

### Segmen Geografis Geographical Segment

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	Jadetabek	Jawa Barat West Java	Jawa Tengah dan Jawa Timur Central Java and East Java	Luar Jawa Outside Java	Total	Description
<b>2021</b>						
Pendapatan Bunga dan Syariah – neto	427,759	7,086	15,898	12,912	463,654	Interest and Sharia Income - Net
Pendapatan Operasional Lainnya	451,262	1,447	517	703	453,929	Other Operating Income
Beban Penyisihan Kerugian Penurunan Nilai Aset Keuangan Dan Non-Keuangan	(567,084)	(2,510)	(2,626)	-	(572,220)	Provision for Impairment Losses on Financial and Non-Financial Assets
Beban Umum dan Administrasi, Tenaga Kerja, Kerugian atas Perubahan Nilai Wajar dan Lain-Lain	(390,223)	(6,909)	(21,375)	(13,841)	(432,349)	General and Administrative Expenses, Personnel Expenses, Unrealized Loss Changes of Fair Value and Others
Rugi Operasional	(78,286)	(886)	(7,587)	(226)	(86,985)	Loss from Operations
Beban Non Operasional - neto	(62,046)	(106)	(1,719)	(11)	(63,883)	Non-Operating Expenses - Net
Rugi Sebelum Pajak Penghasilan	(140,333)	(992)	(9,306)	(237)	(150,868)	Loss Before Income Tax Expenses
Manfaat Pajak Penghasilan	31,805	-	-	-	31,805	Loss Tax Benefit
Rugi Bersih Tahun Berjalan	(108,528)	(992)	(9,306)	(237)	(119,063)	Net Loss for the Year
<b>Total Aset</b>	<b>24,362,455</b>	<b>93,695</b>	<b>335,831</b>	<b>155,162</b>	<b>24,947,143</b>	<b>Total Assets</b>
<b>Total Liabilitas</b>	<b>19,294,326</b>	<b>227,555</b>	<b>580,356</b>	<b>599,988</b>	<b>20,702,226</b>	<b>Total Liabilities</b>
<b>2020</b>						
Pendapatan Bunga dan Syariah – neto	165,815	5,199	13,109	5,536	189,658	Interest and Sharia Income - Net
Pendapatan Operasional Lainnya	486,265	3,203	495	1,042	491,005	Other Operating Income
Beban Umum dan Administrasi, Tenaga Kerja, Kerugian atas Perubahan Nilai Wajar dan Lain-Lain	(439,719)	(125)	(9)	-	(439,853)	General and Administrative Expenses, Personnel Expenses, Unrealized Loss Changes of Fair Value and Others
Beban Umum dan Administrasi, Tenaga Kerja, dan Lain-Lain	(441,048)	(8,796)	(27,145)	(11,512)	(488,500)	General and Administration Expenses, Personnel, and Others
Rugi Operasional	(228,686)	(519)	(13,551)	(4,933)	(247,689)	Loss Before Income Tax Expense
Pendapatan Non Operasional - neto	(46,968)	45	(3,439)	(180)	(50,543)	Loss Tax Benefit
Rugi Sebelum Pajak Penghasilan	(275,654)	(474)	(16,991)	(5,114)	(298,233)	Net Loss for the Year
Manfaat Pajak Penghasilan	46,039	-	-	-	46,039	Income Tax Benefit

Uraian	Jadetabek	Jawa Barat West Java	Jawa Tengah dan Jawa Timur Central Java and East Java	Luar Jawa Outside Java	Total	Description
Rugi Bersih Tahun Berjalan	(229,615)	(474)	(16,991)	(5,114)	(252,194)	Profit for the Year
<b>Total Aset</b>	<b>25,691,043</b>	<b>105,108</b>	<b>330,583</b>	<b>94,673</b>	<b>26,221,407</b>	<b>Total Assets</b>
<b>Total Liabilitas</b>	<b>20,627,724</b>	<b>282,923</b>	<b>540,571</b>	<b>746,632</b>	<b>22,197,850</b>	<b>Total Liabilities</b>
<b>KENAIKAN (PENURUNAN) (%) / INCREASE (DECREASE) (%)</b>						
Pendapatan Bunga dan Syariah – neto	157.97	36.29	21.28	133.23	144.47	Interest and Sharia Income - Net
Pendapatan Operasional Lainnya	(7.20)	(54.81)	4.52	(32.54)	(7.55)	Other Operating Income
Beban Penyisihan Kerugian Penurunan Nilai Aset Keuangan dan Non-Keuangan	28.97	1,905.97	28,786.75	-	30.09	Provision of Impairment Losses on Financial and Non-Financial Assets
Beban Umum dan Administrasi, Tenaga Kerja, Kerugian atas Perubahan Nilai Wajar dan Lain-Lain	(11.52)	(21.45)	(21.26)	20.23	(11.49)	General and Administrative Expenses, Personnel Expenses, Unrealized Loss Changes of Fair Value and Others
<b>Rugi Operasional</b>	<b>(65.77)</b>	<b>70.83</b>	<b>(44.02)</b>	<b>(95.41)</b>	<b>(64.88)</b>	<b>Loss from Operations</b>
Pendapatan Non Operasional - neto	32.10	(337.81)	(50.01)	(93.96)	26.39	Non-Operating Income - Net
<b>Rugi Sebelum Pajak Penghasilan</b>	<b>(49.09)</b>	<b>109.43</b>	<b>(45.23)</b>	<b>(95.36)</b>	<b>(49.41)</b>	<b>Loss Before Income Tax Expense</b>
Manfaat Pajak Penghasilan	(30.92)	-	-	-	(30.92)	Loss Tax Benefit
<b>Rugi Bersih Tahun Berjalan</b>	<b>(52.73)</b>	<b>109.43</b>	<b>(45.23)</b>	<b>(95.36)</b>	<b>(52.79)</b>	<b>Net Loss for the Year</b>
<b>Total Aset</b>	<b>(5.17)</b>	<b>(10.86)</b>	<b>1.59</b>	<b>63.89</b>	<b>(4.86)</b>	<b>Total Assets</b>
<b>Total Liabilitas</b>	<b>(6.46)</b>	<b>(19.57)</b>	<b>7.36</b>	<b>(19.64)</b>	<b>(6.74)</b>	<b>Total Liabilities</b>

Segmen geografis Bank Victoria dan Entitas Anak dibagi menjadi 4 (empat), yakni Jadetabek, Jawa Barat, Jawa Tengah, dan Jawa Timur, dan luar Jawa. Pertimbangan untuk membagi operasi bisnisnya menjadi 4 (empat) segmen geografis ini didasarkan pada kondisi lingkungan yang berbeda di setiap wilayah ekonomi tersebut, yang disertai dengan jenis risiko dan peluang yang berbeda pula.

Dari segi pendapatan bunga dan syariah – neto, seluruh segmen geografis Bank mencatatkan pertumbuhan, wilayah yang paling tinggi mengalami pertumbuhan yaitu Jadetabek sebesar 157,97% atau setara dengan Rp261,94 miliar. Sedangkan pertumbuhan tertendah terjadi pada wilayah Jawa Barat sebesar 36,29% atau setara Rp1,89 miliar.

Sejalan dengan meningkatnya pendapatan bunga dan syariah – neto, wilayah Jadetabek mencatatkan penurunan rugi operasional sebesar 65,77% atau setara Rp150,40 miliar. Hal tersebut juga terjadi pada wilayah Jawa Tengah dan Jawa Timur yang mencatatkan penurunan rugi operasional sebesar 44,02% atau setara Rp5,97 miliar.

The geographical segment of Bank Victoria and its Subsidiary is divided into 4 (four), which are Jadetabek, West Java, Central Java and East Java, and outside Java. Considerations for dividing the business operations into 4 (four) geographical segments are based on different environmental conditions in each of these economic regions, which are accompanied by different types of risks and opportunities.

In terms of net interest and sharia income, all of the Bank's geographical segments recorded growth, in which the largest growth was Jadetabek, reaching 157.97% or equivalent to Rp261.94 billion. Meanwhile, the lowest growth occurred in West Java at 36.29% or equivalent to Rp1.89 billion.

In line with the increase in net interest and sharia income, Jadetabek area recorded a decrease in loss from operations of 65.77% or equivalent to Rp150.40 billion. This also occurred in Central Java and East Java regions, which recorded a decrease in loss from operations of 44.02% or equivalent to Rp5.97 billion.

Dari sisi aset, wilayah Jadetabek dan Jawa Barat mengalami penurunan masing-masing sebesar 5,17% dan 10,86%. Sedangkan, wilayah Jawa Tengah dan Jawa Timur serta Luar Jawa mencatatkan pertumbuhan aset masing-masing sebesar 1,59% dan 63,89%. Sedangkan, dari sisi liabilitas, hanya wilayah Jawa Tengah dan Jawa Timur yang mengalami kenaikan sebesar 7,36%.

## Prospek Usaha 2022

Pertumbuhan ekonomi global tahun 2022 diperkirakan masih berada pada tingkat yang relatif tinggi, yakni 4,4%. Hal ini sejalan dengan meningkatnya volume perdagangan global yang diperkirakan tumbuh tinggi, sebesar 6,5%. Kondisi ini didukung oleh penanganan pandemi Covid-19 yang terkendali dan besarnya stimulus yang diberikan oleh berbagai pemerintah negara dunia. Namun, meningkatnya kasus Covid-19 seiring dengan berkembangnya varian baru virus Covid-19 serta kendala pada proses vaksinasi berpotensi menyebabkan terhambatnya pemulihan aktivitas ekonomi global.

Dari sisi moneter, prospek pemulihan ekonomi Amerika Serikat yang diperkirakan lebih cepat, serta rencana normalisasi kebijakan moneter di beberapa negara berpotensi meningkatkan risiko tekanan terhadap nilai tukar rupiah pada tahun 2022, yang ditransmisikan melalui arus modal keluar (*capital outflow*) dari *emerging markets*, termasuk salah satunya Indonesia. Pertumbuhan ekonomi Indonesia pada tahun 2022 diharapkan akan mampu tumbuh 5,2%–5,8%. Akselerasi pertumbuhan ekonomi Indonesia ditopang oleh meningkatnya investasi, yang diperkirakan tumbuh 5,4%–6,9%, dan ekspor barang dan jasa yang tumbuh sebesar 4,3%–6,8%. Peningkatan investasi dan ekspor akan meningkatkan kapasitas produktif dan produktivitas perekonomian, yang sempat turun karena dampak Covid-19.

Dari sisi lapangan usaha, sektor jasa keuangan diproyeksikan akan tumbuh pada kisaran 5,5%–5,9% pada tahun 2022. Intermediasi perbankan diperkirakan semakin membaik dengan stabilitas keuangan yang tetap terjaga. Sejalan dengan semakin pulihnya ekonomi nasional pasca pandemi Covid-19, meningkatnya mobilitas masyarakat dan aktivitas ekonomi, percepatan realisasi APBN dan APBD oleh Pemerintah, bauran kebijakan moneter dan makroprudensial yang bersinergi dengan Pemerintah dan otoritas terkait, serta kemajuan restrukturisasi kredit oleh perbankan, Bank Indonesia memprakirakan penyaluran kredit oleh perbankan dan pembiayaan oleh pasar modal akan berangsur meningkat. Pertumbuhan kredit dan DPK pada tahun 2022 diperkirakan meningkat masing-masing menjadi 6,0%–8,0% dan 7,0%–9,0%. Dari sisi penawaran, peningkatan kredit didukung oleh tetap longgarnya likuiditas dan menurunnya persepsi risiko, di samping kebijakan makroprudensial yang akan tetap akomodatif.

Sumber / Source:

- Rencana Kerja Pemerintah Tahun 2022 - Badan Perencanaan Pembangunan Nasional (Bappenas); dan
- Laporan Perekonomian Indonesia 2021 - Bank Indonesia.
- Government Work Plan 2022 - National Development Planning Agency (Bappenas); and
- Indonesia Economic Report 2021 - Bank Indonesia.

In terms of assets, Jadetabek and West Java regions experienced a decline of 5.17% and 10.86%, respectively. Whereas, Central Java and East Java region and Outside Java region recorded asset growth of 1.59% and 63.89%, respectively. In terms of liabilities, only Central Java and East Java region experienced an increase of 7.36%.

## 2022 Business Prospects

The global economic growth in 2022 is estimated to still be at a relatively high level of 4.4%. This is in line with the increase in global trade volume, which is estimated to grow at 6.5%. This condition is supported by government in many countries as shown by how they control and handle the Covid-19 pandemic and by the magnitude of the stimulus provided. However, the increase in Covid-19 cases along with the development of new variants and obstacles in the vaccination process have the potential to cause delays in the global economic recovery.

From the monetary side, the prospect of faster economic recovery in the United States and plans to normalize monetary policy in several countries have the potential to increase the risk of pressure on rupiah exchange rate in 2022, which is transmitted through capital outflows from emerging markets, including Indonesia. Indonesia's economic growth in 2022 is expected to grow 5.2%-5.8%. The acceleration of Indonesia's economic growth is supported by the increased investment, which is estimated to grow by 5.4%-6.9%, and export of goods and services, which grow by 4.3%-6.8%. Increased investment and export will increase the production capacity and productivity of the economy, which fell due to the impact of Covid-19.

In terms of business field, the financial services sector is projected to grow in the range of 5.5%-5.9% in 2022. Banking intermediation is predicted to improve further along with maintained financial stability. In line with the national economic recovery post Covid-19 pandemic, the increasing mobility of people and economic activities, the acceleration of APBN (State Budget) and APBD (Regional Budget) realization by the Government, the mix of monetary and macroprudential policies in synergy with the Government and relevant authorities, and the progress in loan restructuring by banks, Bank Indonesia predicts that lending by banks and financing by the capital market will gradually increase. Growth in loans and deposits in 2022 is predicted to increase to 6.0%-8.0% and 7.0%-9.0%, respectively. In terms of supply, the increase in loans is supported by continued loose liquidity and reduced risk perceptions, in addition to the macroprudential policies that will remain accommodative.

## Strategi dan Rencana Kerja 2022

Bank Victoria menetapkan target jangka pendek yang akan dicapai dalam waktu setahun ke depan dan target jangka menengah untuk tiga tahun mendatang dengan memperhatikan visi-misi, strategi, kebijakan umum, kondisi dan kapasitas internal Bank.

### Strategi Jangka Pendek

Bank menetapkan beberapa target pengembangan dalam aktivitas usaha maupun operasional sebagai berikut.

1. Mencapai target bisnis utama, yang meliputi:
  - a. Target aset sebesar Rp24,67 triliun atau naik 5,6% dibandingkan tahun 2021;
  - b. Target kredit sebesar Rp15,03 triliun atau naik 7,3% dibandingkan tahun 2021;
  - c. Target DPK sebesar Rp18,57 triliun atau naik 6,9% dibandingkan tahun 2021 sehingga rasio LDR pada akhir 2022 menjadi 80,95%;
  - d. Target laba/rugi sebelum pajak sebesar Rp108 miliar;
2. Meningkatkan rasio CAR menjadi sebesar 20,12%. Meningkatkan permodalan melalui aksi korporasi Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) dan Penambahan Dana Setoran Modal, dan Hak Memesan Efek Terlebih Dahulu (HMETD). Selain itu, Bank berencana melakukan aksi korporasi lain, meliputi:
  - a. Melakukan divestasi Bank Victoria Syariah melalui peninjakan *merger* dengan bank swasta syariah lain; dan
  - b. Melakukan penyertaan ke perusahaan *fintech* guna meningkatkan portofolio kredit UMKM dengan *channeling* melalui perusahaan *fintech* tersebut;
3. Meningkatkan komposisi *current account – saving account* (CASA) yang seimbang guna mampu menekan *cost of fund* sehingga Bank menjadi lebih kompetitif;
4. Meningkatkan portofolio kredit termasuk penyaluran kredit kepada usaha kecil menengah (UKM);
5. Melakukan evaluasi kinerja kantor cabang dan sistem yang mendorong peningkatan penjualan, produktivitas, dan efisiensi guna profitabilitas Bank secara keseluruhan serta rencana terhadap jaringan kantor. Adapun rencana perubahan jaringan kantor yang akan dilakukan adalah menutup 1 kantor cabang pembantu (KCP) Cikini, Jakarta;
6. Mengembangkan penyelenggaraan produk Bank dengan pendekatan digitalisasi guna memenuhi dan meningkatkan kebutuhan nasabah;
7. Mengakselerasi penyelesaian agunan yang diambil alih (AYDA) sesuai regulasi dan ketentuan yang berlaku;
8. Melanjutkan penerapan prinsip-prinsip *good corporate governance* (GCG), fungsi kepatuhan dan manajemen risiko melalui implementasi yang berkelanjutan; serta
9. Berkontribusi pada program keuangan berkelanjutan untuk mendukung program-program pemerintah dalam mewujudkan pembangunan ekonomi yang maju dan berkeadilan dalam rangka mendorong keberhasilan rencana aksi keuangan berkelanjutan (RAKB).

## Strategies and Work Plans in 2022

Bank Victoria sets short-term targets to be achieved within the next one year and medium-term targets for the next three years with due observance of the Bank's vision-mission, strategies, general policies, conditions, and internal capacity.

### Short-Term Strategies

The Bank has set several development targets in the business and operational activities as follows.

1. Achieving primary business targets, which include:
  - a. Target for assets at Rp24.67 trillion or an increase of 5.6% compared to in 2021;
  - b. Target for loans at Rp15.03 trillion or an increase of 7.3% compared to in 2021;
  - c. Target for third-party deposits at Rp18.57 trillion or an increase of 6.9% compared to in 2021 so that LDR ratio at the end of 2022 will be 80.95%;
  - d. Target for income/loss before tax at Rp108 billion;
2. Increasing CAR to 20.12%. Increasing capital through corporate actions of Capital Increase Without Pre-emptive Rights (PMTHMETD) and Additional Capital Deposit Funds, and Pre-emptive Rights (HMETD). Furthermore, the Bank plans to conduct other corporate actions, including:
  - a. Divestment of Bank Victoria Syariah through exploration of mergers with other Islamic private banks; and
  - b. Participating in fintech companies to increase MSME loan portfolio by channeling through the fintech company;
3. Improving a balanced composition of current account – saving account (CASA) in order to reduce the cost of funds so that the Bank becomes more competitive;
4. Increasing loan portfolio, including lending to small and medium enterprises (SMEs);
5. Evaluating the performance of branch offices and systems that encourage increased sales, productivity, and efficiency for the overall profitability of the Bank as well as plans for the office network. The plans for changes to the office network that will be carried out is to close 1 sub-branch office (KCP) Cikini, Jakarta;
6. Developing Bank products with a digitalization approach to meet and increase customer needs;
7. Accelerating settlement of foreclosed assets (AYDA) in accordance with the applicable regulations and provisions;
8. Continuing the application of principles of good corporate governance (GCG), compliance function, and risk management through sustainable implementation; and
9. Contributing to sustainable finance programs to support government programs in realizing advanced and equitable economic development in order to encourage the success of the Sustainable Finance Action Plan (RAKB).



## Strategi Jangka Menengah

Bank telah menetapkan target jangka menengah yang selaras dengan arah dan kebijakan Bank dengan tetap memelihara pertumbuhan dan kinerja usaha yang positif serta dengan melakukan beberapa aktivitas-aktivitas fundamental guna lebih meningkatkan daya saing Bank di Industri Perbankan. Beberapa target jangka menengah Bank, sebagai berikut.

- Melanjutkan strategi pengembangan bisnis secara organik.
  - Mencapai target finansial di tahun 2023 dan 2024 dengan total aset sebesar Rp25,70 triliun dan Rp27,18 triliun, portofolio kredit sebesar Rp16,07 triliun dan Rp17,33 triliun, DPK sebesar Rp19,83 triliun dan Rp21,40 triliun;
  - Menjaga tingkat kesehatan Bank melalui pencapaian tingkat *capital adequacy ratio* (CAR) di tahun 2023 dan 2024 sebesar 18,73% dan 18,10%, serta peringkat tingkat kesehatan Bank minimal rating 2;
  - Melanjutkan penilaian optimalisasi jaringan kantor guna mencapai kinerja bisnis dengan memperkuat sistem penilaian kinerja bisnis kantor cabang; dan
  - Melanjutkan pengembangan inovasi produk dan layanan termasuk pendekatan digital yang berkelanjutan untuk dapat mengoptimalkan keunggulan dan peluang yang dimiliki Bank dalam meraih pangsa pasar yang lebih luas serta untuk memenuhi kebutuhan nasabah baik nasabah *existing* maupun calon nasabah;
- Melanjutkan penguatan GCG sehingga berjalan maksimal dan sesuai dengan ketentuan regulator; dan
- Melanjutkan investasi strategis dalam teknologi informasi melalui peningkatan proses, kontrol, kualitas layanan, dan produktivitas di dalam aktivitas penyelenggaraan teknologi informasi dan kegiatan operasional Bank guna mendukung pertumbuhan bisnis yang berkelanjutan dengan tetap menjaga beban operasional pada tingkat yang wajar.

## Medium-Term Strategies

The Bank has set medium-term targets that are in line with the Bank's directions and policies while maintaining positive business growth and performance as well as by carrying out several fundamental activities to further improve the Bank's competitiveness in the Banking Industry. Some of the Bank's medium-term targets are as follows.

- Continuing the business development strategies in an organic manner.
  - Achieving financial targets in 2023 and 2024 with total assets of Rp25.70 trillion and Rp27.18 trillion, loan portfolio of Rp16.07 trillion and Rp17.33 trillion, third-party deposits of Rp19.83 trillion and Rp21.40 trillion, respectively;
  - Maintaining the Bank's soundness level by achieving capital adequacy ratio (CAR) of 18.73% and 18.10% in 2023 and 2024, respectively, and a minimum rating of 2;
  - Continuing the assessment of office network optimization in order to achieve business performance by strengthening the branch office's business performance assessment system; and
  - Continuing the development of product and service innovations including a sustainable digital approach to optimize the Bank's advantages and opportunities in gaining a wider market share and to meet customer needs, both existing and prospective customers;
- Continuing the strengthening of GCG so that it runs optimally and in accordance with the regulatory provisions; and
- Continuing strategic investment in information technology through improving processes, control, service quality, and productivity in information technology operations and the Bank's operational activities to support sustainable business growth while maintaining operating expenses at a reasonable level.

## Tinjauan Keuangan

### Financial Overview

### Laporan Posisi Keuangan Konsolidasian

#### Aset

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>ASET KEUANGAN / FINANCIAL ASSETS</b>					
Kas	53,929	61,723	(7,794)	(12.63)	Cash
Giro pada Bank Indonesia	663,114	612,623	50,490	8.24	Current Accounts with Bank Indonesia

### Consolidated Statements of Financial Position

#### Assets

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)



Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Giro pada Bank Lain	405,667	184,921	220,746	119.37	Current Accounts with Other Banks
Penempatan pada Bank Indonesia dan Bank Lain – Neto	762,366	1,692,225	(929,858)	(54.95)	Placements with Bank Indonesia and Other Banks - Net
Efek-Efek – Neto	5,175,487	6,406,671	(1,231,184)	(19.22)	Marketable Securities - Net
Efek-Efek yang Dibeli dengan Janji Dijual Kembali	690,715	447,805	242,910	54.24	Securities Purchased under Resale Agreement
Pendapatan Bunga dan Syariah yang Masih akan Diterima	364,694	248,240	116,453	46.91	Interest and Sharia Income Receivables
Pinjaman yang Diberikan, Pembiayaan dan Piutang Syariah - neto	14,786,801	14,245,976	540,825	3.80	Loans, Sharia Financing and Receivables - Net
Penyertaan Saham – Neto	34,887	57,368	(22,481)	(39.19)	Investments in Shares - Net
Aset Lain-Lain - Neto	27,271	59,910	(32,639)	(54.48)	Other Assets - Net
<b>Total Aset Keuangan</b>	<b>22,964,930</b>	<b>24,017,462</b>	<b>(1,052,533)</b>	<b>(4.38)</b>	<b>Total Financial Assets</b>
<b>ASET NON-KEUANGAN / NON-FINANCIAL ASSETS</b>					
Biaya Dibayar di Muka	14,455	21,000	(6,545)	(31.17)	Prepaid Expenses
Agunan yang Diambil Alih - Neto	1,154,057	1,367,712	(213,655)	(15.62)	Foreclosed Assets - Net
Aset Pajak Tangguhan - Neto	302,389	250,489	51,900	20.72	Deferred Tax Assets - Net
Aset Tetap dan Aset Hak Guna - neto	508,119	559,673	(51,554)	(9.21)	Fixed Assets and Right of Use Assets - Net
Aset Tak Berwujud - Neto	3,194	5,071	(1,877)	(37.01)	Intangible Assets - Net
<b>Total Aset Non-Keuangan</b>	<b>1,982,213</b>	<b>2,203,945</b>	<b>(221,732)</b>	<b>(10.06)</b>	<b>Total Non-Financial Assets</b>
<b>Total Aset</b>	<b>24,947,143</b>	<b>26,221,407</b>	<b>(1,274,264)</b>	<b>(4.86)</b>	<b>Total Assets</b>

#### Aset

Pada tahun 2021, Bank mencatatkan total aset sebesar Rp24,95 triliun, menurun 4,86% atau sebesar Rp1,27 triliun dibandingkan dengan tahun 2020 yang tercatat sebesar Rp26,22 triliun. Penurunan total aset terutama berasal dari aset keuangan dan aset non keuangan yang menurun masing-masing sebesar Rp1,05 triliun atau 4,38% dan Rp221,73 miliar atau 10,06%.

#### Aset Keuangan

Aset keuangan Bank di tahun 2021 mencapai Rp22,96 triliun, menurun 4,38% atau sebesar Rp1,05 triliun dibandingkan dengan tahun 2020 yang tercatat sebesar Rp24,02 triliun. Penurunan tersebut khususnya berasal dari efek-efek – neto dan penempatan pada bank indonesia dan bank lain yang menurun masing-masing sebesar Rp1,23 triliun dan Rp929,86 miliar.

#### Aset Non-Keuangan

Bank Victoria mencatatkan total aset non-keuangan di tahun 2021 mencapai Rp1,98 triliun, menurun 10,06% dari Rp2,20 triliun di tahun 2020. Menurunnya aset non-keuangan Bank terutama dipengaruhi oleh penurunan agunan yang diambil alih – neto sebesar 15,62% atau Rp213,66 miliar.

#### Assets

In 2021, the Bank recorded total assets of Rp24.95 trillion, a decrease of 4.86% or Rp1.27 trillion compared to in 2020 which recorded Rp26.22 trillion. The decrease in total assets mainly due to financial assets and non-financial assets which decreased by Rp1.05 trillion or 4.38% and Rp221.73 billion or 10.06%, respectively.

#### Financial Assets

The Bank's financial assets in 2021 reached Rp22.96 trillion, a decrease of 4.38% or Rp1.05 trillion compared to in 2020 which amounted to Rp24.02 trillion. This decrease was particularly due to net marketable securities and placements with Bank Indonesia and other banks which decreased by Rp1.23 trillion and Rp929.86 billion, respectively.

#### Non-Financial Assets

Bank Victoria recorded total non-financial assets in 2021 at Rp1.98 trillion, a decrease of 10.06% from Rp2.20 trillion in 2020. The decrease in the Bank's non-financial assets was mainly due to the decrease in net foreclosed assets by 15.62% or Rp213.66 billion.

## Liabilitas

## Liabilities

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>LIABILITAS KEUANGAN / FINANCIAL LIABILITIES</b>					
Liabilitas Segera	336	2,087	(1,751)	(83.90)	Obligations Due Immediately
Simpanan Nasabah	18,084,872	18,331,429	(246,557)	(1.34)	Deposits from Customers
Simpanan dari Bank Lain – Pihak Ketiga	1,037,173	2,060,970	(1,023,797)	(49.68)	Deposits from Other Banks - Third Parties
Efek-Efek yang Diterbitkan	1,348,520	1,544,029	(195,509)	(12.66)	Securities Issued
Akrual dan Liabilitas Lain-Lain	124,855	179,217	(54,362)	(30.33)	Accruals and Other Liabilities
<b>Total Liabilitas Keuangan</b>	<b>20,595,756</b>	<b>22,117,732</b>	<b>(1,521,975)</b>	<b>(6.88)</b>	<b>Total Financial Liabilities</b>
<b>LIABILITAS NON-KEUANGAN / NON-FINANCIAL LIABILITIES</b>					
Pinjaman dari Bank Lain	50,000	-	50,000	100.00	Borrowings
Utang Pajak	12,585	21,619	(9,034)	(41.79)	Taxes Payable
Liabilitas Imbalan Kerja Karyawan	43,884	58,499	(14,615)	(24.98)	Employee Benefits Obligation
<b>Total Liabilitas Non-Keuangan</b>	<b>106,469</b>	<b>80,118</b>	<b>26,351</b>	<b>32.89</b>	<b>Total Non-Financial Liabilities</b>
<b>Total Liabilitas</b>	<b>20,702,226</b>	<b>22,197,850</b>	<b>(1,495,624)</b>	<b>(6.74)</b>	<b>Total Liabilities</b>

### Liabilitas

Total liabilitas Bank per 31 Desember 2021 sebesar Rp20,70 triliun. Jumlah ini lebih rendah 6,74% atau sebesar Rp1,50 triliun dibandingkan dengan posisi per 31 Desember 2020 sebesar Rp22,20 triliun. Penurunan total liabilitas terutama disebabkan oleh liabilitas keuangan yang menurun sebesar 6,88%.

### Liabilitas Keuangan

Liabilitas keuangan Bank Victoria tahun 2021 mengalami penurunan 6,88% atau Rp1,52 triliun menjadi Rp20,60 triliun dari semula Rp22,12 triliun. Kondisi ini dipengaruhi oleh penurunan pada seluruh komponen liabilitas keuangan dengan penurunan tertinggi pada simpanan dari bank lain – pihak ketiga sebesar 49,68% atau Rp1,02 triliun.

### Liabilitas Non-Keuangan

Pada tahun 2021, liabilitas non-keuangan mengalami peningkatan 32,89% atau Rp26,35 miliar menjadi Rp106,47 miliar dari semula Rp80,12 miliar. Kondisi ini disebabkan adanya pinjaman dari bank lain sebesar Rp50,00 miliar.

## Dana Syirkah Temporer

### Liabilities

The Bank's total liabilities as of 31 December 2021 amounted to Rp20.70 trillion. This amount is 6.74% or Rp1.50 trillion lower compared to the position as of 31 December 2020 of Rp22.20 trillion. The decrease in total liabilities was mainly due to financial liabilities which decreased by 6.88%.

### Financial Liabilities

Bank Victoria's financial liabilities in 2021 decreased by 6.88% or Rp1.52 trillion to Rp20.60 trillion from previously Rp22.12 trillion. This condition was influenced by the decrease in all components of financial liabilities with the highest decrease in deposits from other banks – third parties by 49.68% or Rp1.02 trillion.

### Non-Financial Liabilities

In 2021, non-financial liabilities increased by 32.89% or Rp26.35 billion to Rp106.47 billion from previously Rp80.12 billion. This condition was due to borrowings amounting to Rp50.00 billion.

## Temporary Syirkah Fund

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Simpanan Nasabah	1,221,992	1,324,682	(102,690)	(7.75)	Deposits from Customers
Simpanan dari Bank Lain - Pihak ketiga	8,500	54,500	(46,000)	(84.40)	Deposits from Other Banks – Third Parties
<b>Total Dana Syirkah Temporer</b>	<b>1,230,492</b>	<b>1,379,182</b>	<b>(148,690)</b>	<b>(10.78)</b>	<b>Total Temporary Syirkah Fund</b>

### Dana Syirkah Temporer

Dana *syirkah* temporer Bank Victoria tahun 2021 tercatat sebesar Rp1,23 triliun, menurun 10,78% atau Rp148,69 miliar dibandingkan tahun 2020 yang mencapai Rp1,38 triliun. Hal ini terutama dipengaruhi oleh simpanan nasabah yang menurun sebesar 7,75% atau setara Rp102,69 miliar.

### Temporary Syirkah Fund

Bank Victoria's temporary *syirkah* funds in 2021 amounted to Rp1.23 trillion, a decrease of 10.78% or Rp148.69 billion compared to in 2020 which reached Rp1.38 trillion. This was mainly influenced by deposits from customers which decreased by 7.75% or equivalent to Rp102.69 billion.

### Ekuitas

### Equity

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>EKUITAS YANG DAPAT DIATRIBUSIKAN KEPADA PEMILIK ENTITAS INDUK / EQUITY ATTRIBUTABLE TO EQUITY HOLDERS OF THE PARENT ENTITY</b>					
Modal Saham - Nilai Nominal	1,048,713	895,195	153,519	17.15	Share Capital - Par Value
Tambahan Modal Disetor	407,786	282,775	125,011	44.21	Additional Paid-In Capital
Setoran Modal Diterima Dimuka	278,000	-	278,000	100.00	Capital Received in Advance
Keuntungan yang Belum Direalisasi atas Perubahan Nilai Wajar Efek-Efek yang Diukur pa-da Nilai Wajar melalui Penghasilan Komprehensif Lain, Setelah Pajak	18,283	94,219	(75,936)	(80.59)	Unrealised Gain on Changes in Fair Value of Marketable Securities Measured at Fair Value through Other Comprehensive Income, Net of Tax
Surplus Revaluasi Aset Tetap, Setelah Pajak	382,456	375,372	7,084	1.89	Gain on Revaluation of Fixed Assets, net of Tax
Pengukuran Kembali Atas Liabilitas Imbalan Kerja Setelah Pajak	20,973	19,536	1,437	7.36	Remeasurements on Employee Benefit Liabilities, Net of Tax
Saldo Laba:					Retained Earnings
Telah Ditentukan Penggunaannya	186,356	186,356	-	0.00	Appropriated
Belum Ditentukan Penggunaannya	671,840	790,904	(119,064)	(15.05)	Unappropriated
<b>Total Ekuitas yang dapat Diatribusikan kepada Pemilik Entitas Induk</b>	<b>3,014,408</b>	<b>2,644,357</b>	<b>370,051</b>	<b>13.99</b>	<b>Total Equity Attributable to Equity Holders of the Parent Entity</b>
<b>Kepentingan Non-Pengendali</b>	<b>17</b>	<b>18</b>	<b>(1)</b>	<b>(4.90)</b>	<b>Non-Controlling Interests</b>
<b>Total Ekuitas</b>	<b>3,014,425</b>	<b>2,644,375</b>	<b>370,050</b>	<b>13.99</b>	<b>Total Equity</b>

### Ekuitas

Hingga akhir tahun 2021, ekuitas Bank tumbuh 13,99% atau Rp370,05 miliar menjadi Rp3,01 triliun dari semula Rp2,64 triliun. Pertumbuhan ekuitas terjadi karena adanya setoran modal diterima dimuka sebesar Rp278,00 miliar serta meningkatnya modal ditempatkan dan disetor penuh sebesar 17,15% atau Rp153,52 miliar.

### Equity

As of the end of 2021, the Bank's equity grew 13.99% or Rp370.05 billion to Rp3.01 trillion from previously Rp2.64 trillion. The equity grew due to the advanced paid-in capital amounting to Rp278.00 billion and the increase in issued and fully paid-in capital by 17.15% or Rp153.52 billion.

## Laporan Laba Rugi dan Penghasilan Komprehensif Lain Konsolidasian

## Consolidated Statements of Profit or Loss and Other Comprehensive Income

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>PENDAPATAN DAN BEBAN OPERASIONAL / OPERATING INCOME AND EXPENSE</b>					
Pendapatan Bunga dan Syariah	1,612,210	1,790,640	(178,430)	(9.96)	Interest and Sharia Income
Beban Bunga dan Syariah	(1,148,556)	(1,600,982)	(452,426)	(28.26)	Interest and Sharia Expenses

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>Pendapatan Bunga dan Syariah - neto</b>	<b>463,654</b>	<b>189,658</b>	<b>273,996</b>	<b>144.47</b>	<b>Interest and Sharia Income - Net</b>
<b>Pendapatan dan Beban Operasional Lainnya / Other Operating Income and Expenses</b>					
<b>Pendapatan Operasional Lainnya</b>			<b>Other Operating Income</b>		
Pendapatan dari Investasi Reksadana	21,744	83,949	(62,205)	(74.10)	Income from Investment in Mutual Funds
Keuntungan atas Penjualan Efek-Efek yang Diukur pada Nilai Wajar melalui Laba Rugi dan Penghasilan Komprehensif Lain - Neto	163,555	274,361	(110,806)	(40.39)	Gain on Sale of Securities Measured at Fair Value through Profit or Loss and Other Comprehensive Income - Net
Provisi dan Komisi selain dari Pinjaman	4,484	7,332	(2,848)	(38.84)	Fees and Commissions from Transactions Other than Loans
Kerugian yang Belum Terealisasi atas Perubahan Nilai Wajar Efek-Efek yang Diukur pada Nilai Wajar melalui Laba Rugi - Neto	(304)	(1,663)	(1,359)	(81.71)	Unrealised Loss on Changes in Fair Value of Securities Measured at Fair Value through Profit or Loss - Net
Lain-Lain	264,450	127,026	137,425	108.19	Others
<b>Total Pendapatan Operasional Lainnya</b>	<b>453,929</b>	<b>491,005</b>	<b>(37,076)</b>	<b>(7.55)</b>	<b>Total Other Operating Income</b>
<b>Beban Operasional Lainnya</b>			<b>Other Operating Expenses</b>		
Beban Penyisihan Kerugian Penurunan Nilai Aset Keuangan	(567,641)	(358,962)	208,680	58.13	Provision for Impairment Losses on Financial Assets
Beban Penyisihan Kerugian Penurunan Nilai Aset Non-Keuangan	(4,579)	(109,718)	(105,139)	(95.83)	Provision for Impairment Losses on Non-Financial Assets
Kerugian atas Perubahan Nilai Wajar Penyertaan Saham yang Diukur pada Nilai Wajar melalui Laba Rugi	(22,481)	(28,826)	(6,346)	(22.01)	Loss on Changes in Fair Value of Investment in Shares Measured at Fair Value through Profit or Loss
Beban Umum dan Administrasi	(155,746)	(165,281)	(9,535)	(5.77)	General and Administrative Expenses
Beban Tenaga Kerja	(144,994)	(175,277)	(30,284)	(17.28)	Personnel Expenses
Lain-Lain	(109,128)	(90,289)	18,839	20.87	Others
<b>Total Beban Operasional Lainnya</b>	<b>(1,004,569)</b>	<b>(928,353)</b>	<b>76,216</b>	<b>8.21</b>	<b>Total Other Operating Expenses</b>
<b>Rugi Operasional</b>	<b>(86,985)</b>	<b>(247,689)</b>	<b>(160,704)</b>	<b>(64.88)</b>	<b>Loss from Operations</b>
<b>Beban Non Operasional - Neto</b>	<b>(63,883)</b>	<b>(50,543)</b>	<b>13,340</b>	<b>26.39</b>	<b>Non-Operating Expense - Net</b>
<b>Rugi Sebelum Beban Pajak Penghasilan</b>	<b>(150,868)</b>	<b>(298,233)</b>	<b>(147,364)</b>	<b>(49.41)</b>	<b>Loss Before Income Tax Expense</b>
<b>Manfaat Pajak Penghasilan - Neto</b>	<b>31,805</b>	<b>46,039</b>	<b>(14,234)</b>	<b>(30.92)</b>	<b>Income Tax Benefits - Net</b>
<b>Rugi Bersih Tahun Berjalan</b>	<b>(119,063)</b>	<b>(252,194)</b>	<b>(133,130)</b>	<b>(52.41)</b>	<b>Net Loss for the Year</b>
<b>PENGHASILAN KOMPREHENSIF LAIN / OTHER COMPREHENSIVE INCOME</b>					
<b>Pos-Pos yang akan Direklasifikasi ke Laba Rugi</b>			<b>Items that would be Reclassified to Profit or Loss</b>		
Perubahan Nilai Wajar Efek-Efek yang Diukur pada Nilai Wajar melalui Penghasilan Komprehensif Lain	(90,858)	78,467	(169,324)	(215.79)	Change in the Fair Value of Marketable at Fair Value through Other Comprehensive Income
Pajak Tangguhan Terkait	14,921	(14,746)	29,667	201.18	Related Deferred Income Tax
<b>Pos yang tidak akan Direklasifikasi ke Laba Rugi</b>			<b>Items that would never be Reclassified to Profit or Loss</b>		
Surplus Revaluasi Aset Tetap	7,084	43,120	(36,036)	(83.57)	Gain on Revaluations of Fixed Assets
Pajak Penghasilan	-	(7,084)	7,084	100.00	Income Taxes
Pengukuran Kembali atas Liabilitas Imbalan Kerja	1,865	212	1,653	781.30	Remeasurements on Employee Benefit Liabilities

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Pajak Tangguhan Terkait	(427)	217	(644)	(297.15)	Related Deferred Income Tax
<b>(Rugi) Penghasilan Komprehensif Lain, Setelah Pajak Penghasilan</b>	<b>(67,416)</b>	<b>100,185</b>	<b>(167,601)</b>	<b>(167.29)</b>	<b>Other Comprehensive (Loss) Income, Net of Income Tax</b>
<b>Rugi Komprehensif</b>	<b>(186,479)</b>	<b>(152,009)</b>	<b>36,471</b>	<b>24.31</b>	<b>Total Comprehensive Loss</b>
<b>Rugi Bersih yang dapat Diatribusikan kepada:</b>	<b>(119,063)</b>	<b>(252,194)</b>	<b>(133,130)</b>	<b>(52.79)</b>	<b>Net Loss Attributable to:</b>
Pemilik Entitas Induk	(119,063)	(252,194)	(133,130)	(52.79)	Equity Holders of the Parent Entity
Kepentingan Nonpengendali	0	(0)	0	2,280.00	Non-Controlling Interests
<b>Rugi Komprehensif yang dapat Diatribusikan kepada:</b>	<b>(186,479)</b>	<b>(152,009)</b>	<b>34,471</b>	<b>22.68</b>	<b>Comprehensive Loss Attributable to:</b>
Pemilik Entitas Induk	(186,478)	(152,010)	34,468	22.68	Equity Holders of the Parent Entity
Kepentingan Nonpengendali	(1)	1	(2)	(190.61)	Non-Controlling Interests
<b>Rugi Bersih per Saham yang dapat Diatribusikan kepada Pemilik Entitas Induk</b>					<b>Loss per Share Attributable to Entity Holders of the Parent Entity</b>
Dasar (Rupiah penuh)	(12.90)	(28.17)	(15.27)	(54.21)	Basic (full Rupiah)
Dilusian (Rupiah penuh)	(12.90)	(28.17)	(15.27)	(54.21)	Basic (full Rupiah)

#### Pendapatan dan Beban Operasional

Pendapatan dan beban operasional yang dibukukan Bank tahun 2021 mencapai Rp463,65 miliar, meningkat 144,47% atau Rp274,00 miliar dibandingkan tahun 2020 yang tercatat sebesar Rp189,66 miliar. Peningkatan ini terutama disebabkan oleh menurunnya beban bunga dan syariah sebesar 28,26% atau setara Rp452,43 miliar dari sebelumnya Rp1,60 triliun menjadi Rp1,15 triliun.

#### Operating Income and Expenses

The Bank's operating income and expenses in 2021 reached Rp463.65 billion, an increase of 144.47% or Rp274.00 billion compared to in 2020 which was recorded at Rp189.66 billion. This increase was mainly due to the decrease in interest and sharia expenses by 28.26% or equivalent to Rp452.43 billion from previously Rp1.60 trillion to Rp1.15 trillion.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>PENDAPATAN DAN BEBAN OPERASIONAL / OPERATING INCOME AND EXPENSE</b>					
Pendapatan Bunga dan Syariah	1,612,210	1,790,640	(178,430)	(9.96)	Interest and Sharia Income
Beban Bunga dan Syariah	(1,148,556)	(1,600,982)	(452,426)	(28.26)	Interest and Sharia Expenses
Pendapatan Bunga dan Syariah Bersih	463,654	189,658	273,996	144.47	<b>Interest and Sharia Income - Net</b>

#### Pendapatan Bunga dan Syariah

Pada tahun 2021, pendapatan bunga dan syariah mengalami penurunan 9,96% atau Rp178,43 miliar, menjadi Rp1,61 triliun dari semula Rp1,79 triliun. Hal ini terutama disebabkan oleh penurunan pinjaman yang diberikan dan pendapatan bagi hasil masing-masing sebesar Rp124,01 miliar dan Rp36,17 miliar.

#### Interest and Sharia Income

In 2021, interest and sharia income decreased by 9.96% or Rp178.43 billion, to Rp1.61 trillion from previously Rp1.79 trillion. This was mainly due to the decrease in loans and profit sharing by Rp124.01 billion and Rp36.17 billion, respectively.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>PENDAPATAN BUNGA / INTEREST INCOME</b>					
Pinjaman yang Diberikan	1,226,163	1,350,171	(124,008)	(9.18)	Loans
Efek-Efek	251,623	275,588	(23,966)	(8.70)	Marketable Securities
Surat-surat Berharga yang Dibeli dengan Janji Dijual Kembali	10,335	6,244	4,091	65.52	Securities Purchased under Agreement to Resell
Penempatan pada Bank Indonesia dan Bank Lain	10,270	9,887	384	3.88	Placements with Bank Indonesia and Other Banks
<b>Total Pendapatan Bunga</b>	<b>1,498,392</b>	<b>1,641,890</b>	<b>(143,499)</b>	<b>(8.74)</b>	<b>Total Interest Income</b>
<b>PENDAPATAN SYARIAH / SHARIA INCOME</b>					
Pendapatan Bagi Hasil	40,938	77,113	(36,174)	(46.91)	Profit Sharing
Pendapatan Margin	20,378	18,471	1,907	10.33	Margin Income
Pendapatan Ijarah – Neto	117	232	(115)	(49.63)	Income from Ijarah - Net
Pendapatan Usaha Utama Lainnya	52,385	52,935	(550)	(1.04)	Income from Other Main Operational
<b>Total Pendapatan Syariah</b>	<b>113,818</b>	<b>148,750</b>	<b>(34,932)</b>	<b>(23.48)</b>	<b>Total Sharia Income</b>
<b>Total Pendapatan Bunga dan Syariah</b>	<b>1,612,210</b>	<b>1,790,640</b>	<b>(178,430)</b>	<b>(9.96)</b>	<b>Total Interest and Sharia Income</b>

**Beban Bunga dan Syariah**

Pada posisi 31 Desember 2021, beban bunga dan syariah mencapai Rp1,15 triliun, lebih rendah 28,26% dibandingkan tahun 2020 yang sebesar Rp1,60 triliun. Menurunnya beban bunga dan syariah bersumber dari simpanan dana pihak ketiga berupa deposito yang mengalami penurunan sebesar 31,27% atau Rp370,82 miliar.

**Interest and Sharia Expenses**

At the position of 31 December 2021, interest and sharia expenses reached Rp1.15 trillion, 28.26% lower than in 2020 which was Rp1.60 trillion. The decrease in interest and sharia expenses came from third party deposits in the form of time deposits, which decreased by 31.27% or Rp370.82 billion.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>Simpanan Dana Pihak Ketiga</b>					
<b>Third Party Deposits</b>					
Deposito	815,156	1,185,972	(370,816)	(31.27)	Time Deposits
Tabungan	118,256	119,954	(1,699)	(1.42)	Savings Account
Giro	36,223	70,533	(34,310)	(48.64)	Current Account
Obligasi yang Diterbitkan	157,443	181,750	(24,307)	(13.37)	Bonds Issued
Amortisasi Emisi Obligasi	6,096	6,421	(325)	(5.06)	Amortisation of Bonds Issuance Cost
<b>Simpanan dari Bank Lain</b>					
<b>Deposits from Other Banks</b>					
Call Money	15,211	24,181	(8,970)	(37.09)	Call Money
Kewajiban Repo	-	11,381	(11,381)	(100.00)	Repurchase Liabilities
Negotiable Certificate Deposits	-	789	(789)	(100.00)	Negotiable Certificate Deposits
Lain-lain	171	-	171	100.00	Others
<b>Total Beban Bunga dan Syariah</b>	<b>1,148,556</b>	<b>1,600,982</b>	<b>(452,426)</b>	<b>(28.26)</b>	<b>Total Interest and Sharia Expenses</b>

### Pendapatan Operasional Lainnya

Pendapatan operasional lainnya yang tercatat di akhir tahun 2021 sebesar Rp453,93 miliar, mengalami penurunan sebesar Rp37,08 miliar atau 7,55% dibandingkan tahun 2020 yang sebesar Rp491,01 miliar. Penurunan tersebut disebabkan oleh keuntungan atas penjualan efek-efek yang diukur pada nilai wajar melalui laba rugi dan penghasilan komprehensif lain – bersih yang menurun sebesar Rp110,81 miliar.

### Other Operating Income

Other operating income at the end of 2021 was recorded at Rp453.93 billion, a decrease of Rp37.08 billion or 7.55% compared to in 2020 which was Rp491.01 billion. The decrease was due to the net gain on sale of marketable securities measured at fair value through profit or loss and other comprehensive income, which decreased by Rp110.81 billion.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>PENDAPATAN OPERASIONAL LAINNYA / OTHER OPERATING INCOME</b>					
Pendapatan dari Investasi Reksadana	21,744	83,949	(62,205)	(74.10)	Income from Investment in Mutual Funds
Keuntungan atas Penjualan Efek-Efek yang Diukur pada Nilai Wajar melalui Laba Rugi dan Penghasilan Komprehensif – Neto	163,555	274,361	(110,806)	(40.39)	Gain on Sale of Securities Measured at Fair Value through Profit or Loss and Other Comprehensive Income - Net
Provisi dan Komisi Selain dari Pinjaman	4,484	7,332	(2,848)	(38.84)	Fees and Commissions from Transactions Other than Loans
Kerugian yang Belum Terealisasi atas Perubahan Nilai Wajar Efek-Efek yang Diukur pada Nilai Wajar Melalui Laba Rugi - Neto	(304)	(1,663)	(1,359)	(81.71)	Unrealised Loss on Changes in Fair Value of Securities Measured at Fair Value through Profit or Loss - Net
Lain-Lain	264,450	127,026	137,425	108.19	Others
<b>Total Pendapatan Operasional Lainnya</b>	<b>453,929</b>	<b>491,005</b>	<b>(37,076)</b>	<b>(7.55)</b>	<b>Total Other Operating Income</b>

### Beban Operasional Lainnya

Beban operasional lainnya tercatat pada tahun 2020 sebesar Rp928,35 miliar, sementara pada tahun 2021 jumlah yang tercatat sebesar Rp1,00 triliun atau mengalami kenaikan sebesar 8,21%. Bertambahnya beban operasional lainnya dikarenakan naiknya beban penyisihan kerugian penurunan nilai aset keuangan sebesar 58,13% dari sebelumnya Rp358,96 miliar menjadi Rp567,64 miliar.

### Other Operating Expenses

Other operating expenses in 2020 amounted to Rp928.35 billion, while in 2021 the amount was recorded at Rp1.00 trillion or increasing by 8.21%. The increase in other operating expenses was due to the increase in the provision for impairment losses on financial assets by 58.13% from previously Rp358.96 billion to Rp567.64 billion.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>BEBAN OPERASIONAL LAINNYA / OTHER OPERATING EXPENSES</b>					
Beban Penyisihan Kerugian Penurunan Nilai Aset Keuangan	(567,641)	(358,962)	208,680	58.13	Provision for Impairment Losses on Financial Assets
Beban Penyisihan Kerugian Penurunan Nilai Aset Non-Keuangan	(4,579)	(109,718)	(105,139)	(95.83)	Provision for Impairment Losses on Non-Financial Assets
Kerugian atas Perubahan Nilai Wajar Penyertaan Saham yang Diukur pada Nilai Wajar melalui Laba Rugi	(22,481)	(28,826)	(6,346)	(22.01)	Loss on Changes in Fair Value of Investment in Shares Measured at Fair Value through Profit or Loss
Beban Umum dan Administrasi	(155,746)	(165,281)	(9,535)	(5.77)	General and Administrative Expenses
Beban Tenaga Kerja	(144,994)	(175,277)	(30,284)	(17.28)	Personnel Expenses
Lain-lain	(109,128)	(90,289)	18,839	20.87	Others
<b>Total Beban Operasional Lainnya</b>	<b>(1,004,569)</b>	<b>(928,353)</b>	<b>76,216</b>	<b>8.21</b>	<b>Total Other Operating Expenses</b>



### Rugi Operasional

Rugi operasional Bank pada tahun 2021 mengalami penurunan sebesar 64,88%, dari sebelumnya Rp247,69 miliar menjadi Rp 86,99 miliar. Hal ini terutama disebabkan oleh meningkatnya pendapatan bunga dan syariah – bersih sebesar 144,47% menjadi Rp463,65 miliar dari sebelumnya Rp189,66 miliar.

### Loss From Operations

The Bank's loss from operations in 2021 decreased by 64.88%, from previously Rp247.69 billion to Rp86.99 billion. This was mainly due to the increase in net interest and sharia income by 144.47% to Rp463.65 billion from previously Rp189.66 billion.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Pendapatan Bunga dan Syariah Bersih	463,654	189,658	273,996	144.47	Interest and Sharia Income - Net
Pendapatan Operasional Lainnya	453,929	491,005	(37,076)	(7.55)	Other Operating Income
Beban Operasional Lainnya	(1,004,569)	(928,353)	(76,216)	8.21	Other Operating Expenses
<b>Rugi Operasional</b>	<b>(86,985)</b>	<b>(247,689)</b>	<b>(160,704)</b>	<b>(64.88)</b>	<b>Loss from Operations</b>

### Beban Non-Operasional

Pada tahun 2021, beban non-operasional mengalami peningkatan sebesar 26,39% atau Rp13,34 miliar dari sebelumnya Rp50,54 miliar menjadi Rp63,88 miliar. Meningkatnya beban non-operasional Bank bersumber dari rugi penjualan AYDA yang meningkat sebesar Rp19,87 miliar atau 39,92%.

### Non-Operating Expenses

In 2021, non-operating expenses increased by 26.39% or Rp13.34 billion from previously Rp50.54 billion to Rp63.88 billion. The increase in the Bank's non-operating expenses came from a loss on Sales of Foreclosed Assets which increased by Rp19.87 billion or 39.92%.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>PENDAPATAN NON-OPERASIONAL / NON-OPERATING INCOME</b>					
Laba Revaluasi Valas	8,345	-	8,345	100.00	Revaluation Profit
Laba Penjualan Aset Tetap	-	915	(915)	(100.00)	Gain on Sale of Fixed Assets
Hasil Sewa	143	266	(123)	(46.30)	Rent Fees
Laba Penjualan AYDA	122	-	122	100.00	Gain on Sale of Foreclosed Assets
Lain-Lain	1,291	251	1,040	415.15	Others
<b>BEBAN NON-OPERASIONAL / NON-OPERATING EXPENSES</b>					
Rugi Penjualan AYDA	(69,633)	(49,766)	19,867	39.92	Loss on Sale of Foreclosed Assets
Penurunan Nilai Properti Ter-bengkalai	-	(355)	(355)	(100.00)	Impairment on Abandoned Property
Rugi Penjualan Aset Tetap	(3,099)	-	(3,099)	(100.00)	Loss on Sales of Fixed Asset
Lain-Lain	(1,053)	(1,855)	(801)	(43.21)	Others
<b>Total Beban Non-Operasional – neto</b>	<b>(63,883)</b>	<b>(50,543)</b>	<b>13,340</b>	<b>26.39</b>	<b>Total Non-Operating Expenses - net</b>

### Rugi Sebelum Beban Pajak Penghasilan

Rugi sebelum beban pajak tahun 2021 mengalami penurunan sebesar 49,41% atau Rp147,37 miliar, dari sebelumnya Rp298,23 miliar menjadi Rp150,87 miliar. Hal ini terutama disebabkan oleh penurunan rugi operasional sebesar Rp160,71 miliar atau 64,88%.

### Loss Before Income Tax Expense

Loss before tax expense in 2021 decreased by 49.41% or Rp147.37 billion, from previously Rp298.23 billion to Rp150.87 billion. This was mainly due to a decrease in loss from operations by Rp160.71 billion or 64.88%.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Rugi Operasional	(86,985)	(247,689)	(160,704)	(64.88)	Loss from Operations
Beban Non Operasional - neto	(63,883)	(50,543)	13,340	26.39	Non-Operating Expense - net
<b>Rugi Sebelum Beban Pajak Penghasilan</b>	<b>(150,868)</b>	<b>(298,233)</b>	<b>(147,364)</b>	<b>(49.41)</b>	<b>Loss Before Income Tax Expense</b>

#### Manfaat Pajak Penghasilan – Neto

Pada tahun 2021, manfaat pajak penghasilan – neto mengalami penurunan 30,92% atau Rp14,23 miliar menjadi Rp31,81 miliar dibandingkan tahun sebelumnya yang sebesar Rp46,04 miliar. Penurunan tersebut disebabkan oleh menurunnya pajak tangguhan Entitas Induk sebesar 18,28% atau setara Rp9,08 miliar.

#### Income Tax Benefit – Net

In 2021, income tax benefit – net decreased by 30.92% or Rp14.23 billion to Rp31.81 billion compared to that of previous year which was Rp46.04 billion. The decrease was due to the decrease in deferred tax of the Parent Entity by 18.28% or equivalent to Rp9.08 billion.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>Entitas Induk</b>					<b>Parent Company</b>
Pajak Kini	-	-	-	-	Current Tax
Pajak Tangguhan	(40,588)	(49,665)	(9,078)	(18.28)	Deferred Tax
<b>Total</b>	<b>(40,588)</b>	<b>(49,665)</b>	<b>(9,078)</b>	<b>(18.28)</b>	<b>Total</b>
<b>Entitas Anak</b>					<b>Subsidiary</b>
Pajak Kini	-	-	-	-	Current Tax
Pajak Tangguhan	8,783	3,627	5,157	142.19	Deferred Tax
<b>Total</b>	<b>8,783</b>	<b>3,627</b>	<b>5,157</b>	<b>142.19</b>	<b>Total</b>
<b>Konsolidasian</b>					<b>Consolidated</b>
Pajak Kini	-	-	-	-	Current Tax
Pajak Tangguhan	(31,805)	(46,039)	(14,234)	(30.92)	Deferred Tax
<b>Total</b>	<b>(31,805)</b>	<b>(46,039)</b>	<b>(14,234)</b>	<b>(30.92)</b>	<b>Total</b>

#### Rugi Bersih Tahun Berjalan

Pada tahun 2021, Bank Victoria membukukan rugi bersih tahun berjalan sebesar Rp119,06 miliar, mengalami penurunan sebesar Rp133,13 miliar atau 52,79% dibandingkan dengan tahun 2020 sebesar Rp252,19 miliar. Hal tersebut dipengaruhi oleh rugi sebelum beban pajak penghasilan yang mengalami penurunan sejalan dengan meningkatnya pendapatan bunga dan syariah – bersih sepanjang tahun 2021.

#### Net Loss for the Year

In 2021, Bank Victoria recorded a net loss for the year of Rp119.06 billion, a decrease of Rp133.13 billion or 52.79% compared to in 2020 of Rp252.19 billion. This was affected by the loss before income tax expense which decreased in line with the increase in interest and sharia income - net throughout 2021.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Rugi Sebelum Beban Pajak Penghasilan	(150,868)	(298,233)	(147,364)	(49.41)	Loss Before Income Tax Expense
Manfaat Pajak Penghasilan - neto	31,805	46,039	(14,234)	(30.92)	Income Tax Benefits - net
<b>Rugi Bersih Tahun Berjalan</b>	<b>(119,063)</b>	<b>(252,194)</b>	<b>(133,130)</b>	<b>(52.79)</b>	<b>Net Loss for the Year</b>

Adapun rugi bersih yang dapat diatribusikan kepada pemilik Entitas Induk pada tahun 2021 mencapai Rp119,06 miliar, menurun 52,79% dari tahun sebelumnya yang mencatatkan rugi bersih sebesar Rp252,19 miliar.

Net loss attributable to equity holders of the Parent Entity in 2021 reached Rp119.06 billion, a decrease of 52.79% from that of the previous year that recorded a net loss of Rp252.19 billion.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>Rugi Bersih yang dapat Diatribusikan kepada:</b>	<b>(119,063)</b>	<b>(252,194)</b>	<b>(133,130)</b>	<b>(52.79)</b>	<b>Net Loss Attributable to:</b>
Pemilik Entitas Induk	(119,063)	(252,194)	(133,130)	(52.79)	Equity Holders of the Parent Entity
Keperentingan Nonpengendali	0	(0)	0	2,280.00	Non-Controlling Interests

#### (Rugi) Penghasilan Komprehensif Lain Setelah Pajak Penghasilan

Pada tahun 2021, Bank membukukan rugi komprehensif lain, setelah pajak penghasilan sebesar Rp67,42 miliar, mengalami penurunan sebesar 167,29% atau Rp167,60 miliar jika dibandingkan tahun 2020 yang memperoleh penghasilan komprehensif lain, setelah pajak penghasilan sebesar Rp100,19 miliar. Kondisi tersebut disebabkan oleh penurunan pada perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain sebesar 215,79%.

#### Other Comprehensive (Loss)/Income, Net of Income Tax

In 2021, the Bank recorded other comprehensive loss, net of income tax, of Rp67.42 billion, a decrease of 167.29% or Rp167.60 billion compared to in 2020 which obtained other comprehensive income, net of income tax, of Rp100.19 billion. This condition was caused by a decrease in changes in fair value of marketable securities measured at fair value through other comprehensive income by 215.79%.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>PENGHASILAN KOMPREHENSIF LAIN / OTHER COMPREHENSIVE INCOME</b>					
<b>Pos-Pos yang akan Direklasifikasi ke Laba Rugi</b>			<b>Items that would be Reclassified to Profit or Loss</b>		
Perubahan Nilai Wajar Efek-Efek yang Diukur pada Nilai Wajar melalui Penghasilan Komprehensif Lain	(90,858)	78,467	(169,324)	(215.79)	Change in the Fair Value of Marketable Securities Measured at Fair Value through Other Comprehensive Income
Pajak Tangguhan Terkait	14,921	(14,746)	29,667	201.18	Related Deferred Income Tax
<b>Pos yang tidak akan Direklasifikasi ke Laba Rugi</b>			<b>Items that would never be Reclassified to Profit or Loss</b>		
Surplus Revaluasi Aset Tetap	7,084	43,120	(36,036)	(83.57)	Gain on Revaluations on Fixed Assets
Pajak Penghasilan	-	(7,084)	7,084	100.00	Income Tax
Pengukuran Kembali atas Liabilitas Imbalan Kerja	1,865	212	1,653	781.30	Remeasurements on Employee Benefit Liabilities
Pajak Tangguhan Terkait	(427)	217	(644)	(297.15)	Related Deferred Income Tax
<b>(Rugi) Penghasilan Komprehensif Lain, Setelah Pajak Penghasilan</b>	<b>(67,416)</b>	<b>100,185</b>	<b>(167,601)</b>	<b>(167.29)</b>	<b>Other Comprehensive (Loss) Income, Net of Income Tax</b>

#### Rugi Komprehensif Tahun Berjalan

Sepanjang tahun 2021, rugi komprehensif tahun berjalan Bank Victoria tercatat sebesar Rp186,48 miliar. Jumlah tersebut meningkat 22,68% atau Rp34,47 miliar dibandingkan tahun 2020 yang tercatat sebesar Rp152,01 miliar. Hal tersebut bersumber dari rugi komprehensif lain, setelah pajak penghasilan yang meningkat signifikan sebesar 167,29%. Peningkatan rugi

#### Comprehensive Loss for the Year

Throughout 2021, Bank Victoria's comprehensive loss for the year was recorded at Rp186.48 billion. This amount increased by 22.68% or Rp34.47 billion compared to in 2020 which was recorded at Rp152.01 billion. This was due to other comprehensive loss, net of income tax, which increased significantly by 167.29%. The increase in comprehensive loss

komprehensif tahun berjalan berdampak pada naiknya rugi komprehensif yang dapat diatribusikan kepada pemilik Entitas Induk sebesar 22,68% atau Rp34,47 miliar.

for the year resulted in an increase in comprehensive loss attributable to equity holders of the Parent Entity by 22.68% or Rp34.47 billion.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>Rugi Komprehensif yang dapat Diatribusikan kepada:</b>	<b>(186,479)</b>	<b>(152,009)</b>	<b>34,470</b>	<b>22.68</b>	<b>Comprehensive Loss Attributable to:</b>
Pemilik Entitas Induk	(186,478)	(152,010)	34,468	22.68	Equity Holders of the Parent Entity
Kepentingan Non-Pengendali	(1)	1	(2)	(190.61)	Non-Controlling Interests

### Rugi Bersih per Saham

Sejalan dengan menurunnya rugi bersih tahun berjalan, rugi bersih per saham dasar/dilusan Bank pada tahun 2021 mengalami penurunan sebesar 54,21% dari Rp28,17 pada tahun 2020 menjadi Rp12,90 pada tahun 2021.

### Net Loss per Share

In line with the decrease in net loss for the year, the Bank's basic/diluted net loss per share in 2021 decreased by 54.21% from Rp28.17 in 2020 to Rp12.90 in 2021.

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>Rugi Bersih Per Saham yang dapat Diatribusikan kepada Pemilik Entitas Induk</b>					<b>Loss per Share Attributable to Entity Holders of the Parent Entity</b>
Dasar (Rupiah penuh)	(12.90)	(28.17)	(15.27)	(54.21)	Basic (full Rupiah)
Dilusan (Rupiah penuh)	(12.90)	(28.17)	(15.27)	(54.21)	Dilution (full Rupiah)

## Laporan Arus Kas Konsolidasian

## Consolidated Statements of Cash Flows

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>ARUS KAS DARI AKTIVITAS OPERASI / CASH FLOWS FROM OPERATING ACTIVITIES</b>					
Penerimaan dari Pendapatan Bunga dan Syariah dan Komisi	1,402,170	1,673,182	(271,012)	(16.20)	Receipt from Interest and Sharia Income and Commissions
Pembayaran Bunga dan Syariah	(1,186,761)	(1,598,151)	(411,390)	(25.74)	Payment of Interest and Sharia Expense
Penerimaan dari Pendapatan Operasional Lainnya	487,523	530,881	(43,359)	(8.17)	Receipt from Other Operating Income
Penerimaan dari Penjualan Agunan yang Diambil Alih	182,231	122,827	59,404	48.36	Receipt from Sale of Foreclosed Assets
Pembayaran Beban Umum dan Administrasi	(110,607)	(111,232)	(625)	(0.56)	Payment of General and Administrative Expenses
Pembayaran Beban Tenaga Kerja	(158,002)	(184,010)	(26,008)	(14.13)	Payment of Personnel Expenses
Pembayaran Beban Operasional Lainnya	(141,685)	(111,761)	29,925	26.78	Payment of Other Operating Expenses
Pembayaran Pendapatan Non-Operasional Lainnya	8,726	3,751	4,975	132.64	Payment of Other Non-Operating Income
Pembayaran Pajak Penghasilan	-	(207)	207	100.00	Payment of Income Tax
Pembayaran Pajak Final atas Revaluasi Aset Tetap	-	(376)	376	100.00	Payment of Final Tax on Fixed Asset Revaluation

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>(Kenaikan)/Penurunan dalam Aset Operasi:</b>			<b>(Increase)/Decrease in Operating Assets:</b>		
Penempatan pada Bank Indonesia	-	20,000	(20,000)	(100.00)	Placements with Bank Indonesia
Pinjaman yang Diberikan	(1,023,457)	2,201,161	(3,224,618)	(146.50)	Loans
Efek-Efek yang Dijual dengan Janji Dibeli Kembali	-	1,114,235	(1,114,235)	(100.00)	Securities Sales under Repurchase Agreements
Efek-Efek yang Dibeli dengan Janji Dijual Kembali	(242,910)	552,201	(795,111)	(143.99)	Securities Purchased under Resale Agreements
Beban Dibayar di Muka	4,629	4,275	354	8.28	Prepaid Expenses
Agunan yang Diambil Alih	(43,017)	(547,540)	(504,524)	(92.14)	Foreclosed Assets
Penyertaan Saham	(4,520)	215	(4,735)	(2,206.22)	Investment in Shares
Aset Hak Guna	(2,503)	(36,759)	34,256	93.19	Right-of-Use Asset
Aset Lain-Lain	10,417	12,339	(1,921)	(15.57)	Other Assets
<b>Kenaikan/(Penurunan) dalam Kewajiban Operasi:</b>			<b>Increase/(Decrease) on Operating Liabilities</b>		
Liabilitas Segera	60	1,135	(1,074)	(94.68)	Obligations Due Immediately
Simpanan Nasabah	(246,557)	(3,461,045)	(3,214,488)	(92.88)	Deposits from Customers
Simpanan dari Bank Lain	(1,023,797)	1,151,996	(2,175,793)	(188.87)	Deposits from Other Banks
Utang Pajak Lainnya	(9,033)	(8,115)	(919)	(11.32)	Other Tax Payables
Efek-Efek yang Dijual dengan Janji Dibeli Kembali	-	(1,000,001)	1,000,001	100.00	Securities Sold under Repurchase Agreements
Liabilitas Lain-Lain	(1,074)	1,591	(2,666)	(167.50)	Other Liabilities
Dana Syirkah Temporer	(148,690)	(308,508)	(159,818)	(51.80)	Temporary Syirkah Funds
<b>Arus Kas Bersih (Digunakan untuk) Diperoleh dari Aktivitas Operasi</b>	<b>(2,246,858)</b>	<b>22,084</b>	<b>(2,268,942)</b>	<b>(10,274.21)</b>	<b>Cash Flows Provided from/(used in) Operating Activities</b>
<b>ARUS KAS DARI AKTIVITAS INVESTASI / CASH FLOWS FROM INVESTING ACTIVITIES</b>					
Hasil Penjualan Aset Tetap	22,013	26,957	(4,943)	(18.34)	Proceeds from Sale of Fixed Assets
Pembelian Aset Tetap	(1,119)	(2,687)	(1,568)	(58.36)	Purchase of Fixed Assets
Pembelian Aset Tak Berwujud	(984)	(753)	231	30.62	Purchase of Intangible Assets
Surplus Revaluasi Aset Tetap	-	(6,707)	6,707	100.00	Revaluations Surplus of Fixed Assets
Penjualan/(Pembelian) Efek-Efek	1,213,485	571,043	642,442	112.50	Sale/(Purchase) of Marketable Securities
<b>Arus Kas Bersih Diperoleh dari Aktivitas Investasi</b>	<b>1,233,396</b>	<b>587,853</b>	<b>645,543</b>	<b>109.81</b>	<b>Net Cash Flow Provided from Investing Activities</b>
<b>ARUS KAS DARI AKTIVITAS PENDANAAN / CASH FLOWS FROM FINANCING ACTIVITIES</b>					
Penambahan Modal Disetor	556,529	-	556,529	100.00	Additional Paid-in Capital
Penerbitan Obligasi	-	60,000	(60,000)	(100.00)	Bonds Issuance
Pinjaman yang Diterima	50,000	-	50,000	100.00	Loans Received
Pelunasan Jatuh Tempo Obligasi	(200,000)	(300,000)	(100,000)	(33.33)	Bonds Repayment
Pembayaran Sewa	(10,943)	(11,237)	(294)	(2.62)	Payment for Lease
<b>Arus Kas Bersih Diperoleh dari (Digunakan untuk) Aktivitas Pendanaan</b>	<b>395,586</b>	<b>(251,237)</b>	<b>646,823</b>	<b>257.46</b>	<b>Net Cash Flow Provided from (used in) Financing Activities</b>
<b>Kenaikan/(Penurunan) Bersih Kas dan Setara Kas</b>	<b>(617,876)</b>	<b>358,700</b>	<b>(976,575)</b>	<b>(272.25)</b>	<b>Net Increase/(Decrease) of Cash and Cash Equivalent</b>
<b>Kas dan Setara Kas pada Awal Tahun</b>	<b>2,504,438</b>	<b>2,145,739</b>	<b>358,700</b>	<b>16.72</b>	<b>Cash and Cash Equivalents at Beginning of Year</b>
<b>Kas dan Setara Kas pada Akhir Tahun</b>	<b>1,886,562</b>	<b>2,504,438</b>	<b>(617,876)</b>	<b>(24.67)</b>	<b>Cash and Cash Equivalents at End of Year</b>

### Arus Kas Bersih (Digunakan untuk) Diperoleh dari Aktivitas Operasi

Per 31 Desember 2021, Bank Victoria membukukan kas neto digunakan untuk aktivitas operasi sebesar Rp2,25 triliun. Sedangkan, per 31 Desember 2020 Bank membukukan kas neto diperoleh dari aktivitas operasi sebesar Rp22,08 miliar. Kondisi tersebut disebabkan oleh penurunan pinjaman yang diberikan sebesar Rp3,22 triliun.

### Arus Kas Bersih Diperoleh dari Aktivitas Investasi

Kas neto diperoleh dari aktivitas investasi pada tahun 2021 mencapai Rp1,23 triliun, meningkat signifikan sebesar Rp645,54 miliar atau 109,81% dibandingkan tahun 2020 yang sebesar Rp587,85 miliar. Peningkatan tersebut dikontribusikan oleh penjualan efek-efek yang meningkat signifikan sebesar 112,50% atau Rp642,44 miliar.

### Arus Kas Bersih Diperoleh dari/(Digunakan untuk) Aktivitas Pendanaan

Per 31 Desember 2021, Bank Victoria membukukan kas neto diperoleh dari aktivitas pendanaan sebesar Rp395,59 miliar. Sedangkan, per 31 Desember 2020 Bank membukukan kas neto digunakan untuk aktivitas operasi sebesar Rp251,24 miliar.

### Net Cash (Used in) Provided from Operating Activities

As of 31 December 2021, Bank Victoria recorded net cash used in operating activities of Rp2.25 trillion. While, as of 31 December 2020, the Bank recorded net cash provided from operating activities of Rp22.08 billion. This condition was caused by a decrease in loans by Rp3.22 trillion.

### Net Cash Provided from Investing Activities

Net cash provided from investing activities in 2021 reached Rp1.23 trillion, a significant increase of Rp645.54 billion or 109.81% compared to in 2020 which was Rp587.85 billion. The increase was contributed by the sale of marketable securities which increased significantly by 112.50% or Rp642.44 billion.

### Net Cash Flows Provided from/(Used in) Financing Activities

As per 31 December 2021, Bank Victoria recorded net cash provided from financing activities of Rp395.59 billion. Whereas as per 31 December 2020, the Bank recorded net cash used in financing activities of Rp251.24 billion.

## Rasio Keuangan Penting

Kinerja rasio-rasio keuangan Bank sepanjang tahun 2021 dijelaskan dalam tabel berikut.

**Tabel Rasio Keuangan Penting\***  
Table of Significant Financial Ratios\*

(dalam / in %)

Uraian	2021	2020	Description
<b>RASIO KINERJA / PERFORMANCE RATIO</b>			
Kewajiban Penyediaan Modal Minimum (KPMM) untuk Risiko Kredit, Operasional, dan Pasar	17.49	16.68	Capital Adequacy Ratio (CAR) for Credit, Operational, and Market Risks
Aset Produktif Bermasalah dan Aset Non-Produktif Bermasalah terhadap Total Aset Produktif dan Non Produktif	8.23	5.82	Non-Performing Earning Assets and Non-Performing Non-Earning Assets to Total Earning Assets and Non-Earning Assets
Aset Produktif Bermasalah terhadap Total Aset Produktif	5.02	4.90	Non-Performing Earning Assets to Total Earning Assets
Cadangan Kerugian Penurunan Nilai (CKPN) Aset Keuangan terhadap Aset Produktif	3.13	2.71	Allowance for Impairment Losses (CKPN) of Financial Assets to Earning Assets
NPL Bruto	7.27	7.58	Gross NPL
NPL Neto	4.08	4.91	Net NPL
Imbal Hasil atas Aset (ROA)	(0.71)	(1.26)	Return on Assets (ROA)
Imbal Hasil atas Ekuitas (ROE)	(6.54)	(12.74)	Return on Equity (ROE)
Margin Bunga Bersih (NIM)	2.36	0.82	Net Interest Margin (NIM)
Beban Operasional terhadap Pendapatan Operasional (BOPO)	104.94	112.09	Operating Expenses to Operating Income (BOPO)
Rasio Pinjaman terhadap Dana Pihak Ketiga (LDR)	81.25	75.64	Loan to Deposit Ratio (LDR)
Rasio Pinjaman terhadap Pendanaan (LFR)	79.89	73.97	Loan to Funding Ratio (LFR)
Rasio Dana Murah (CASA)	24.64	20.64	Low-Cost Funding Ratio (CASA)

Uraian	2021	2020	Description
<b>RASIO KEPATUHAN / COMPLIANCE RATIOS</b>			
Persentase Pelanggaran BMPK			Percentage of LLL Violation
Pihak Terkait	0.00	0.00	Related Parties
Pihak Tidak Terkait	0.00	0.00	Non-Related Parties
Persentase Pelampauan BMPK			Percentage of LLL Excess
Pihak Terkait	0.00	0.00	Related Parties
Pihak Tidak Terkait	0.00	0.57	Non-Related Parties
<b>GIRO WAJIB MINIMUM (GWM) BANK UMUM-KONVENSIONAL / MINIMUM STATUTORY RESERVE (GWM) OF COMMERCIAL BANKS-CONVENTIONAL</b>			
Rupiah			Rupiah
GWM Wajib Minimum**)	3.57	3.06	Minimum Statutory GWM**)
Penyangga Likuiditas Makroprudensial ***)	14.97	12.57	Macroprudential Liquidity Buffer***)
Rasio Intermediasi Makroprudensial ****)	0.23	0.88	Macroprudential Intermediation Ratio****)
Valuta Asing	4.05	4.05	Foreign Currencies
<b>GIRO WAJIB MINIMUM (GWM) BANK SYARIAH / MINIMUM STATUTORY RESERVE (GWM) OF SHARIA BANKS</b>			
Rupiah			Rupiah
GWM Wajib Minimum**)	3.54	3.07	Minimum Statutory GWM*)
Posisi devisa neto (PDN) secara keseluruhan	0.98	0.17	Net Open Position (NOP) in overall

\* Merupakan angka PT Bank Victoria International Tbk (Entitas Induk saja). / The figure is of PT Bank Victoria International Tbk (Parent Entity only).

\*\* Sebelumnya Giro Wajib Minimum Primer. / Previously Primary Minimum Statutory Reserve.

\*\*\* Sebelumnya Giro Wajib Minimum Sekunder. / Previously Secondary Minimum Statutory Reserve.

\*\*\*\* Sebelumnya Giro Wajib Minimum LFR. / Previously LFR Minimum Statutory Reserves.

## Kemampuan Membayar Utang dan Kolektibilitas Piutang

### Kemampuan Membayar Utang

Bank menggunakan rasio likuiditas, solvabilitas, dan rentabilitas sebagai parameter untuk mengukur kemampuan dalam memenuhi seluruh kewajiban, baik kewajiban jangka panjang maupun jangka pendek. Rasio-rasio tersebut menjadi acuan dalam menghitung kemampuan Perseroan menyediakan cadangan likuiditas.

Pada tahun 2021, Bank Victoria masih memiliki tingkat likuiditas dan solvabilitas yang baik. Hal ini direpresentasikan oleh kemampuan bank dalam memenuhi segala kewajiban jatuh tempo secara tepat waktu, baik terhadap pembayaran pokok utang ataupun beban bunganya. Berikut ini adalah rasio keuangan perbankan.

### Rasio Likuiditas

Rasio likuiditas Bank Victoria tercermin dari rasio pinjaman terhadap dana pihak ketiga (*loan to deposit ratio/LDR*). Pada tahun 2021, LDR Bank tercatat sebesar 81,25%, mengalami peningkatan dibandingkan tahun sebelumnya sebesar 75,64%. Pencapaian rasio ini mencerminkan bahwa kondisi likuiditas Bank Victoria berada dalam posisi optimal dan sehat, karena masih berada dalam batas ketentuan Bank Indonesia.

## Solvency and Receivables Collectability

### Solvency

The Bank uses the ratio of liquidity, solvency, and profitability as parameters to measure the ability to meet all obligations, both long-term and short-term. These ratios serve as a reference in calculating the Company's ability to provide liquidity reserves.

In 2021, Bank Victoria still had a good level of liquidity and solvency. This is represented by the Bank's ability to meet all obligations due in a timely manner, in terms of payment of debt's principal or interest expense. Below is the banking financial ratio.

### Liquidity Ratio

Bank Victoria's liquidity ratio is reflected in the loan to deposit ratio (LDR) ratio. In 2021, the Bank's LDR was recorded at 81.25%, an increase/a decrease compared to that of previous year of 75.64%. The ratio achievement reflects that Bank Victoria's liquidity condition is in an optimal and sound position, because it is still within the limits of Bank Indonesia regulations.



## Rasio Solvabilitas

Rasio solvabilitas Bank diukur berdasarkan rasio kewajiban penyediaan modal minimum (KPMM) untuk memastikan terpenuhinya risiko kredit, risiko operasional, dan risiko pasar. Pada tahun 2021, Bank Victoria mencatatkan rasio KPMM sebesar 17,49%, meningkat dibandingkan tahun 2020 yang mencapai 16,68%. Nilai ini masih berada di atas ketentuan yang ditetapkan. Oleh karena itu permodalan Bank dapat dikatakan masih berada dalam kondisi yang cukup baik.

## Rasio Kepatuhan

Pada tahun 2021, rasio GWM primer Bank (bank konvensional) sebesar 3,57% untuk mata uang Rupiah dan 4,05% untuk valuta asing. Rasio GWM primer untuk Entitas Anak sebesar 3,54%. Rasio GWM RIM untuk Bank (bank konvensional) adalah 0,23%, sedangkan GWM RIM untuk Entitas Anak adalah nihil, karena RIM Entitas Anak berada dalam kisaran target RIM.

Sedangkan, untuk rasio GWM PLM Bank sebesar 14,97%. GWM PLM/Sekunder yang dimiliki Bank dalam bentuk Sertifikat Bank Indonesia (SBI), Surat Utang Negara (SUN), Surat Berharga Syariah Negara (SBSN), dan/atau kelebihan saldo rekening Giro Rupiah Bank dari GWM primer dan GWM RIM/LFR.

Bank telah memenuhi peraturan Bank Indonesia yang berlaku tentang GMW bank umum konvensional dan Entitas Anak pada 31 Desember 2021 dan 2020.

## Kemampuan Membayar Utang dari Obligasi yang Diterbitkan

Selain dari rasio yang telah disebutkan, kemampuan membayar utang juga dapat tercermin dari peringkat pada efek-efek yang diterbitkan Bank Victoria yaitu Obligasi. Guna mendukung kelayakan, efek-efek yang diterbitkan secara rutin dinilai oleh lembaga pemeringkatan.

Kualitas efek sangat ditentukan oleh kemampuan perusahaan penerbit efek dalam membayar efeknya pada saat jatuh tempo dan kemampuannya membayar bunga atau kupon selama jangka waktu penerbitan efek tersebut. Obligasi yang diterbitkan oleh Bank Victoria dicatatkan di Bursa Efek Indonesia.

## Solvency Ratio

The Bank's solvency ratio is measured based on the minimum capital adequacy ratio (CAR) to ensure the fulfillment of credit risk, operational risk, and market risk. In 2021, Bank Victoria recorded CAR ratio of 17.49%, an increase compared to in 2020 which was 16.68%. This figure was still above the specified provisions. Therefore, the Bank's capital can be considered as in a considerably good condition.

## Compliance Ratios

In 2021, the Bank's primary GWM ratio (conventional bank) was 3.57% for Rupiah currency and 4.05% for foreign currency. The primary GWM ratio for Subsidiary is 3.54%. GWM RIM ratio for the Bank (conventional bank) is 0.23%, while GWM RIM for Subsidiary was nil, because the Subsidiary's RIM was within the target range.

Meanwhile, the Bank's GWM PLM ratio was 14.97%. GWM PLM/Secondary maintained by the Bank comprised of Certificates of Bank Indonesia ("SBI"), Government Debenture Debt ("SUN"), Sharia Government Securities ("SBSN"), and/or excess reserve of the Bank's demand deposits in Rupiah over the primary GWM and GWM RIM/LFR.

The Bank has complied with the applicable Bank Indonesia regulations on GMW of conventional commercial banks and Subsidiary as of 31 December 2021 and 2020.

## Ability to Pay Debt from Bonds Issued


Aside from the ratios mentioned, the ability to pay debt can also be reflected based on the rating of securities issued by Bank Victoria, which are Bonds. In order to support the worthiness, the securities issued are assessed routinely by a rating agency.

The quality of securities is highly determined by the capability of the securities issuance company in paying its securities on the maturity date and its ability to pay interest or coupon throughout the issuance time period of the securities. Bonds issued by Bank Victoria are listed on Indonesia Stock Exchange.

Uraian	Peringkat Rating		Description
	2021	2020	
Obligasi Berkelanjutan, I Bank Victoria Tahap I Tahun 2017	idA- oleh Pefindo idA-by Pefindo	idA- oleh Pefindo idA-by Pefindo	Bank Victoria Continuing Bonds I Phase I Year 2017
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017	idBBB oleh Pefindo idBBB by Pefindo	idBBB oleh Pefindo idBBB by Pefindo	Bank Victoria Continuing Subordination Bonds I Phase I Year 2017
Obligasi Berkelanjutan, I Bank Victoria Tahap II Tahun 2018	idA- oleh Pefindo idA-by Pefindo	idA- oleh Pefindo idA-by Pefindo	Bank Victoria Continuing Bonds I Phase II Year 2018
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018	idBBB oleh Pefindo idBBB by Pefindo	idBBB oleh Pefindo idBBB by Pefindo	Bank Victoria Continuing Subordination Bonds I Phase II Year 2018
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019	idBBB oleh Pefindo idBBB by Pefindo	idBBB oleh Pefindo idBBB by Pefindo	Bank Victoria Continuing Subordination Bonds II Phase I Year 2019

Uraian	Peringkat Rating		Description
	2021	2020	
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019	idBBB oleh Pefindo idBBB by Pefindo	idBBB oleh Pefindo idBBB by Pefindo	Bank Victoria Continuing Subordination Bonds II Phase II Year 2019
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020	idBBB oleh Pefindo idBBB by Pefindo	idBBB oleh Pefindo idBBB by Pefindo	Bank Victoria Continuing Subordination Bonds II Phase III Year 2020

### Arti Peringkat Rating Definition

Uraian Description	Peringkat Rating	Arti Peringkat Rating Definition
 PT Pemeringkat Efek Indonesia (Pefindo)	idA-	<p>Bank Victoria memiliki kapasitas yang kuat untuk memenuhi komitmen keuangan jangka panjang dibandingkan dengan obligor Indonesia lainnya. Namun, Bank dapat terdampak efek buruk dari perubahan keadaan dan kondisi ekonomi dibandingkan obligor yang lebih tinggi. Tanda minus (-) menunjukkan bahwa peringkat tersebut relatif lemah di masing-masing kategori peringkat.</p> <p>Bank Victoria has a strong capacity to meet the long-term financial commitment compared to other Indonesian obligors. However, the Bank may suffer from adverse effects of the changes to conditions and economic conditions compared to higher obligors. Minus sign (-) shows that the rating is relatively weak in the respective rating category.</p>
	idBBB	<p>Bank Victoria dengan peringkat idBBB memiliki kapasitas yang relatif memadai untuk memenuhi komitmen keuangan jangka panjangnya terhadap obligor Indonesia lainnya. Namun, kondisi ekonomi buruk atau perubahan keadaan lebih cenderung mengarah pada kapasitas melemahnya Bank untuk memenuhi komitmen keuangan.</p> <p>Bank Victoria with idBBB rating has relatively adequate capacity to meet its longterm financial commitment to other Indonesian obligors. However, adverse economic conditions or changes to conditions tend to lead to the weakening capacity of the Bank to meet its financial commitment.</p>

### Rentabilitas Bank

Rasio rentabilitas diukur menggunakan rasio imbal hasil atas aset (ROA), rasio imbal hasil atas ekuitas (ROE), rasio margin bunga bersih (NIM), dan beban operasional terhadap pendapatan operasional (BOPO). Pada tahun 2021, Bank mencatat rasio ROA pada sebesar -0,74%, menurun dibanding tahun 2020 sebesar -1,26%. Rasio ROE tercatat sebesar -6,54%, lebih rendah dibandingkan tahun 2020 yang sebesar -12,74%.

Rasio BOPO tercatat sebesar 104,94% pada tahun 2021 lebih rendah dari tahun sebelumnya sebesar 112,09%. Penurunan rasio BOPO terutama disebabkan penurunan beban operasional Bank.

Sedangkan rasio NIM Bank tahun 2021 tercatat sebesar 2,36%, meningkat dari 0,82% di tahun 2020. Peningkatan rasio NIM ini disebabkan kenaikan pendapatan bunga bersih.

### Kolektibilitas Piutang

Kolektibilitas piutang dapat diukur melalui rasio kualitas aset atau *non performing loan* (NPL). NPL neto pada tahun 2021 tercatat sebesar 4,08% menurun dibandingkan tahun 2020 sebesar 4,91%. Nilai tersebut masih berada dibawah ketentuan Bank Indonesia yaitu NPL neto maksimal sebesar 5,00%. Berdasarkan kolektibilitas sesuai peraturan Bank Indonesia, pinjaman yang dikelola oleh Bank diklasifikasikan sebagai berikut.

### Bank's Profitability

The profitability ratio is measured using return on assets (ROA) ratio, return on equity (ROE) ratio, net interest margin (NIM) ratio, and operating expenses to operating income (BOPO) ratio. In 2021, the Bank recorded ROA ratio of -0.74%, an a decrease compared to in 2020 of -1.26%. ROE ratio was recorded at -6.54%, lower than in 2020 which was -12.74%.

BOPO ratio was recorded at 104.94% in 2021, lower than in the previous year of 112.09%. The decrease in BOPO ratio was mainly due to the decrease in the Bank's operating expenses.

Whereas, the Bank's NIM ratio in 2021 was recorded at 2.36%, an increase from 0.82% in 2020. The increase in NIM ratio was due to the increase in net interest income.

### Receivables Collectability

The receivables collectability can be measured through the ratio of asset quality or non-performing loan (NPL). Net NPL ratio in 2021 was recorded at 4.08%, a decrease compared to in 2020 of 4.91%. This value is still below Bank Indonesia regulation, which is a maximum net NPL of 5.00%. Based on the collectability according to Bank Indonesia regulation, loans managed by the Bank are classified as follows.

(dalam juta Rupiah / in million Rupiah)

Uraian	2021		2020		Description
	Pokok Principal	Cadangan Allowance	Pokok Principal	Cadangan Allowance	
Lancar	12,763,802	(101,346)	11,142,549	(58,404)	Current
Dalam Perhatian Khusus	1,581,217	(85,897)	2,609,157	(152,874)	Special Mention
Kurang Lancar	110,801	(41,863)	40,388	(15,495)	Substandard
Diragukan	57,407	(16,157)	184,682	(68,196)	Doubtful
Macet	975,847	(457,011)	866,578	(302,409)	Loss
<b>Total</b>	<b>15,489,074</b>	<b>(702,274)</b>	<b>14,843,354</b>	<b>(597,378)</b>	<b>Total</b>

## Kontribusi kepada Negara

Kontribusi Bank Victoria kepada negara diwujudkan melalui kepatuhan Bank dalam pembayaran pajak. Bank Victoria dalam kegiatan operasionalnya telah menjalankan *good corporate governance* yang dilakukan secara transparan dan akuntabel khususnya dalam mengelola hak dan kewajiban perpajakan yang telah sesuai dengan peraturan yang berlaku.

Pembayaran pajak Bank di tahun 2021 dan 2020 adalah sebagai berikut.

## Contribution to the State

Bank Victoria's contribution to the state is manifested by the Bank's compliance with the tax payment. Bank Victoria in its operational activities has implemented good corporate governance, which is applied in a transparent and accountable manner, especially in managing taxation rights and obligations, which are conducted in accordance with the applicable regulations.

The Bank's tax payments in 2021 and 2020 were as follows.

(dalam juta Rupiah / in million Rupiah)

Uraian	2021	2020	Description
PPh Pasal 4 ayat 2	212,368	269,582	Article 4 paragraph 2 Income Tax
PPh Pasal 21	13,611	16,371	Article 21 Income Tax
PPh Pasal 23	516	313	Article 23 of Income Tax
PPh Pasal 25	-	-	Article 25 of Income Tax
PPh Pasal 26	516	150	Article 26 of Income Tax
PPN	2,943	3,186	VAT
Amnesti Pajak	-	-	Tax Amnesty
<b>Total</b>	<b>229,954</b>	<b>289,602</b>	<b>Total</b>

## Struktur Modal

### Kebijakan Manajemen atas Struktur Modal dan Dasar Pemilihannya

Guna memastikan bahwa Bank memiliki modal yang kuat untuk mendukung strategi pengembangan ekspansi usaha Bank saat ini, Bank Victoria memiliki kebijakan Bank atas kebijakan pengelolaan modal. Selain itu juga untuk mempertahankan kelangsungan pengembangan di masa mendatang, dan untuk memenuhi ketentuan kecukupan permodalan yang ditetapkan oleh regulator serta memastikan agar struktur permodalan Bank telah efisien.

Penyusunan Rencana Permodalan dilakukan berdasarkan penilaian dari penelaahan atas kebutuhan kecukupan permodalan yang dipersyaratkan, dan mengkombinasikannya dengan

## Capital Structure

### Management Policy on Capital Structure and Basis of Selection

In order to ensure that the Bank has strong capital to support its current business expansion strategy, Bank Victoria has a policy on capital management. In addition, the capital policy is also established to maintain future development, to meet the capital adequacy requirements set by the regulators, and to ensure that the Bank's capital structure has been efficient.

The Capital Plan is prepared based on the review of capital adequacy requirement assessment and combines them with review of the latest economic development. The Bank will

tinjauan perkembangan ekonomi terkini. Bank senantiasa akan menghubungkan tujuan keuangan dan kecukupan modal terhadap risiko melalui proses perencanaan modal, begitu pula dengan bisnis yang didasarkan pada permodalan dan persyaratan likuiditas Bank.

Kebutuhan permodalan Bank juga direncanakan dan didiskusikan secara rutin yang didukung dengan data analisis. Permodalan disusun oleh Direksi sebagai bagian dari Rencana Bisnis Bank dan disetujui oleh Dewan Komisaris. Perencanaan ini diharapkan akan memastikan tersedianya modal yang cukup dan terciptanya struktur permodalan yang optimal.

Bank Victoria juga telah mematuhi semua persyaratan modal yang ditetapkan oleh pihak eksternal sepanjang periode pelaporan, khususnya berkenaan dengan perhitungan Kewajiban Penyediaan Modal Minimum (KPMM) dan Aktiva Tertimbang Menurut Risiko (ATMR).

### Rincian Struktur Modal

Perhitungan kecukupan modal dilakukan berdasarkan ketentuan Bank Indonesia yang berlaku, di mana modal yang dimiliki diklasifikasikan dalam 2 *Tier* yaitu Modal *Tier I* dan Modal *Tier II*. Kewajiban penyediaan modal Bank ditentukan dengan memperhitungkan risiko kredit, risiko operasional, dan risiko pasar.

always connect the financial objective with capital adequacy to risk through capital planning process, as well as business based on capital and liquidity requirement of the Bank.

The Bank's capital needs are also planned and discussed regularly with the support of analytical data. The Capital Plan is prepared by the Board of Directors as part of the Bank's Business Plan and approved by the Board of Commissioners. This planning is expected to assure the availability of adequate capital and the creation of optimum capital.

Bank Victoria has complied with all capital requirements stipulated by external parties throughout the reporting period, specifically related to the calculation of Capital Adequacy Ratio (CAR) and Risk Weighted Assets (RWA).

### Details of Capital Structure

Capital adequacy is calculated based on the applicable Bank Indonesia regulations, where the capital owned is classified in 2 Tiers, namely Tier I Capital and Tier II Capital. The Bank's obligations for capital provision is determined by calculating credit risk, operational risk, and market risk.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
<b>KONSOLIDASI / CONSOLIDATION</b>					
<b>Modal</b>					<b>Capital</b>
<i>Tier I</i>	2,339,061	2,169,417	169,643	7.82	<i>Tier I</i>
<i>Tier II</i>	836,086	948,194	(112,108)	(11.82)	<i>Tier II</i>
<b>Total Modal</b>	<b>3,175,147</b>	<b>3,117,611</b>	<b>57,535</b>	<b>1.85</b>	<b>Total Capital</b>
ATMR untuk Risiko Kredit	16,369,736	16,637,610	(267,874)	(1.61)	RWA for Credit Risk
ATMR untuk Risiko Operasional	1,039,637	1,303,631	(263,994)	(20.25)	RWA for Operational Risk
ATMR untuk Risiko Pasar	439,170	720,264	(281,094)	(39.03)	RWA for Market Risk
KPMM untuk Risiko Kredit dan Risiko Operasional (%)	18.24	17.38	0.86	4.95	CAR for Credit Risk and Operational Risk (%)
KPMM untuk Risiko Kredit, Risiko Operasional, dan Risiko Pasar (%)	17.79	16.71	1.08	6.46	CAR for Credit Risk, Operational Risk, and Market Risk (%)
Rasio KPMM yang Diwajibkan (%)	8.00	8.00	0.00	0.00	Required CAR Ratio (%)
<b>BANK</b>					
<b>Modal</b>					<b>Capital</b>
<i>Tier I</i>	2,078,799	1,919,950	158,850	8.27	<i>Tier I</i>
<i>Tier II</i>	828,719	943,447	(114,728)	(12.16)	<i>Tier II</i>
<b>Total Modal</b>	<b>2,907,518</b>	<b>2,863,397</b>	<b>44,122</b>	<b>1.54</b>	<b>Total Capital</b>
ATMR untuk Risiko Kredit	15,297,459	15,260,762	36,696	0.24	RWA for Credit Risk
ATMR untuk Risiko Operasional	932,424	1,204,567	(272,143)	(22.59)	RWA for Operational Risk
ATMR untuk Risiko Pasar	396,882	697,735	(300,854)	(43.12)	RWA for Market Risk
KPMM untuk Risiko Kredit dan Risiko Operasional (%)	17.92	17.39	0.52	2.99	CAR for Credit Risk and Operational Risk (%)
KPMM untuk Risiko Kredit, Risiko Operasional, dan Risiko Pasar (%)	17.49	16.68	0.81	4.86	CAR for Credit Risk, Operational Risk, and Market Risk (%)
Rasio KPMM yang Diwajibkan (%)	8.00	8.00	0.00	0.00	Required CAR Ratio (%)

## Ikatan Material atas Investasi Barang Modal

Pada tahun 2021, Bank Victoria tidak memiliki ikatan material untuk investasi barang modal. Oleh karena itu, Bank tidak menyajikan informasi yang berkaitan dengan hal tersebut, di antaranya berupa:

1. Nama dari pihak yang melakukan ikatan;
2. Tujuan dari perikatan;
3. Sumber dana yang disiapkan untuk memenuhi perikatan tersebut;
4. Denominasi mata uang dalam ikatan tersebut; dan
5. Langkah-langkah yang direncanakan Bank Victoria untuk melindungi risiko dari posisi mata uang asing yang terkait.

## Realisasi Investasi Barang Modal

Pada tahun 2021, total realisasi investasi barang modal Bank mencapai Rp1,10 miliar lebih rendah 57,43% dibandingkan tahun sebelumnya sebesar Rp2,58 miliar. Penurunan tersebut disebabkan Bank tidak melakukan penambahan investasi pada bangunan.

Adapun tujuan dari peningkatan investasi barang modal yaitu untuk mendukung dan menunjang aktivitas operasional kegiatan Bank secara menyeluruh dalam memperkuat kegiatan usaha. Hal tersebut diharapkan mampu memberikan kontribusi yang besar dalam pengembangan dan pertumbuhan Bank ke depan.

## Material Commitments of Capital Goods Investment

Throughout 2021, Bank Victoria did not make any material commitments of capital goods investment. Therefore, the Bank does not present information related to this matter, including in the form of:

1. The name of the party making binding;
2. The purpose of commitment;
3. Source of funds prepared to fulfill the commitment;
4. The currency denomination of the commitment; and
5. The steps planned by Bank Victoria to protect the risk from related foreign currency position.

## Realization of Capital Goods Investment

In 2021, the total realization of the Bank's capital goods investment reached Rp1.10 billion, 57.43% lower than that of previous year of Rp2.58 billion. The decrease was due to the Bank not making additional investments in buildings.

The purpose of increasing capital goods investment is to support and assist the Bank's overall operational activities in strengthening business activities. This is expected to greatly contribute in the development and growth of the Bank in the future.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Bangunan	-	364	(364)	(100.00)	Buildings
Kendaraan Bermotor	491	-	491	100.00	Vehicles
Mesin-Mesin dan Peralatan	545	2,078	(1,533)	(73.79)	Machinery and Equipment
Perlengkapan dan Perabotan Kantor	59	49	10	19.70	Office Furniture and Equipment
Aset Tetap dalam Proses Pembangunan	5	92	(87)	(94.79)	Assets under Construction
<b>Total</b>	<b>1,100</b>	<b>2,583</b>	<b>(1,484)</b>	<b>(57.43)</b>	<b>Total</b>

## Derivatif dan Fasilitas Lindung Nilai

Pada tahun 2021 dan 2020, Bank Victoria tidak melakukan kegiatan yang berhubungan dengan transaksi derivatif ataupun fasilitas lindung nilai.

## Derivative and Hedging Facilities

Throughout 2021 and 2020, Bank Victoria did not conduct any activities involving derivative transactions or hedging facilities.

## Dampak Perubahan Tingkat Suku Bunga terhadap Kinerja Bank Victoria Tahun 2021

Setelah menurunkan suku bunga kebijakan BI 7-Day Reverse Repo Rate (BI7DRR) sebanyak 5 kali sejak 2020, Bank Indonesia kembali menurunkan BI7DRR pada Februari 2021 menjadi 3,50%, terendah sepanjang sejarah. Pada periode selanjutnya

## Impact of Changes of Interest Rates to Bank Victoria's Performance in 2021

After lowering BI 7-Day Reverse Repo Rate (BI7DRR) policy rate 5 times since 2020, Bank Indonesia lowered the BI7DRR again in February 2021 to 3.50%, which is the lowest in the history. In the subsequent period until the end of 2021, Bank Indonesia

hingga akhir 2021, Bank Indonesia tetap mempertahankan BI7DRR sejalan dengan perlunya menjaga stabilitas nilai tukar dan sistem keuangan, di tengah prakiraan inflasi yang rendah dan upaya untuk mendukung pertumbuhan ekonomi.

maintained BI7DRR in line with the need to maintain exchange rate stability and the financial system, amidst the low inflation forecasts and efforts to support economic growth.

## Perbandingan Target dan Realisasi Tahun 2021

Informasi terkait pencapaian target Bank tahun 2021 diungkapkan dalam tabel berikut.

## Comparison of Target and Realization in 2021

Information related to the Bank's 2021 target achievements is disclosed in the following table.

(dalam miliar Rupiah, kecuali dinyatakan lain / in billion Rupiah, unless stated otherwise)

Uraian	Target RBB 2021* 2021 RBB Target*	Realisasi 2021* 2021 Realization*	Pencapaian Achievement (%)	Description
<b>RINGKASAN NERACA / SUMMARY OF BALANCE SHEET</b>				
<b>Total Aset</b>	<b>23,766</b>	<b>23,660</b>	<b>99.56</b>	<b>Total Assets</b>
Penempatan pada Bank Indonesia dan Bank Lain	1,149	591	51.42	Placements with Bank Indonesia and Other Banks
Surat Berharga	6,977	4,649	66.62	Marketable Securities
Kredit yang Diberikan	13,847	14,683	106.04	Loans
Penyertaan Saham – neto	27	392	1,437.59	Investments in Shares - net
Agunan yang Diambil Alih – neto	652	1,324	203.11	Foreclosed Assets - net
Komponen Aset Lainnya	1,113	2,021	181.58	Other Components of Assets
<b>Total Liabilitas</b>	<b>20,900</b>	<b>20,649</b>	<b>98.80</b>	<b>Total Liabilities</b>
Total Dana Pihak Ketiga	17,307	18,072	104.42	Total Third-Party Deposits
Giro	909	1,331	146.42	Current Account
Tabungan	2,726	2,400	88.04	Savings
Deposito Berjangka	13,672	14,348	104.94	Time Deposits
Surat Berharga	494	1,349	273.09	Marketable Securities
Komponen Liabilitas Lainnya	3,099	1,220	39.37	Other Components of Liability
<b>Total Ekuitas</b>	<b>2,865</b>	<b>3,011</b>	<b>105.09</b>	<b>Total Equity</b>
Modal Disetor dan Tambahan Modal Disetor	1,437	1,456	101.33	Fully Paid Capital and Additional Paid-In Capital
Akumulasi Laba/(Rugi)	875	858	98.06	Accumulated Profit/(Loss)
Komponen Ekuitas Lainnya	553	696	126.01	Other Equity Components
<b>RINGKASAN LABA/(RUGI) / SUMMARY OF PROFIT/(LOSS)</b>				
Pendapatan Bunga – neto	320	418	130.77	Interest Income - net
Pendapatan/(Beban) Operasional Selain Bunga – neto	(230)	(513)	223.20	Income/(Expenses) from Operations Other than Interest - net
Laba/(Rugi) Operasional	90	(95)	(105.24)	Operating Profit/(Loss)
Pendapatan/(Beban) Non Operasional – neto	4	(65)	(1,664.93)	Non-Operating Income/(Expenses) - net
Laba/(Rugi) Sebelum Beban Pajak Penghasilan	94	(160)	(170.02)	Profit/(Loss) before Income Tax Expense
Beban Pajak Penghasilan – neto	(19)	41	(215.89)	Income Tax Expense - net
Laba/(Rugi) Bersih Tahun Berjalan	75	(119)	(158.54)	Net Income/(Loss) for the Year
<b>STRUKTUR MODAL / CAPITAL STRUCTURE</b>				
KPMM untuk Risiko Kredit, Risiko Operasional, dan Risiko Pasar (%)	18.32	17.49	95.47	CAR for Credit Risk, Operational Risk, and Market Risk (%)



Uraian	Target RBB 2021* 2021 RBB Target*	Realisasi 2021* 2021 Realization*	Pencapaian Achievement (%)	Description
<b>TOTAL KANTOR / TOTAL OFFICES</b>				
Kantor Cabang	14	14	100.00	Branch Offices
Kantor Cabang Pembantu	25	25	100.00	Sub-branch Offices
Jaringan Kantor Lain (Kantor Kas, Payment Point, dan Lainnya)	0	0	100.00	Other Office Network (Cash Office, Payment Point, and Others)

\* Merupakan angka PT Bank Victoria International Tbk (induk saja).  
\* The figure is for PT Bank Victoria International Tbk (parent only).

Pencapaian kredit yang diberikan Bank Victoria pada tahun 2021 mencapai Rp14,68 triliun atau 106,04% dari target yang ditetapkan sebesar Rp13,85 triliun. Upaya pencapaian pertumbuhan portofolio kredit tetap dilakukan secara berkesinambungan dengan terus memantau pemenuhan *pipeline* dan pengefektifan proses kredit yang *prudent*. Dalam hal ini Bank melakukan sentralisasi proses kredit, perubahan struktur organisasi dan mengoptimalkan pemakaian *outstanding* fasilitas.

Realisasi DPK Bank Victoria per Desember 2021 sebesar Rp18,07 triliun atau mencapai 104,42% dari target sebesar Rp17,31 triliun. Tingkat permodalan yang ditunjukkan dari rasio KPMM untuk risiko kredit, risiko operasional, dan risiko pasar pada tahun 2021 juga masih cukup baik, dengan capaian 17,79%. Angka ini masih berada di atas ketentuan yang ditetapkan, meskipun di bawah target RBB sebesar 18,32%.

Berdasarkan capaian tersebut, secara umum rencana bisnis tahun 2021 telah terpenuhi.

## Proyeksi Tahun 2022

Bank Victoria telah menyusun Rencana Bisnis Bank tahun 2022-2024 dengan target pencapaian kinerja tahun 2022 yang ditunjukkan sebagai berikut.

The achievement of loans provided by Bank Victoria in 2021 reached Rp14.68 trillion or 106.04% of the target set at Rp13.85 trillion. Efforts to achieve credit portfolio growth are still continuously made by monitoring the pipeline fulfillment and making a prudent credit process effective. In this matter, the Bank centralizes the credit process, changes the organizational structure, and optimizes the use of outstanding facilities.

Bank Victoria's DPK realization as of December 2021 was Rp18.07 trillion or reached 104.42% of the target set at Rp17.31 trillion. The level of capital indicated by CAR ratio or credit risk, operational risk, and market risk in 2021 was also still quite good, with 17.79% achievement. This figure is still above the stipulated regulation, even though it is below the RBB target of 18.32%.

Based on these achievements, in general the business plan for 2021 was already fulfilled.

## Projections for 2022

Bank Victoria has developed the Bank's Business Plans of 2022-2024 with performance achievement targets of 2022 shown as follows.

(dalam miliar Rupiah, kecuali dinyatakan lain / in billion Rupiah, unless stated otherwise)

Uraian	Realisasi 2021* 2021 Realization	Proyeksi 2022* 2022 Projection	Pencapaian Achievement (%)	Description
<b>RINGKASAN NERACA / SUMMARY OF BALANCE SHEET</b>				
<b>Total Aset</b>	<b>23,660</b>	<b>24,666</b>	<b>95.92</b>	<b>Total Assets</b>
Penempatan pada Bank Indonesia dan Bank Lain	591	1,399	42.23	Placements with Bank Indonesia and Other Banks
Surat Berharga	4,649	5,918	78.55	Marketable Securities
Kredit yang Diberikan	14,683	15,030	97.69	Loans
Penyertaan	392	435	90.22	Participation
Aset yang Diambil Alih	1,324	885	149.61	Foreclosed Assets
Komponen Aset Lainnya	2,021	1,000	202.10	Other Components of Assets



Uraian	Realisasi 2021* 2021 Realization	Proyeksi 2022* 2022 Projection	Pencapaian Achievement (%)	Description
<b>Total Liabilitas</b>	<b>20,649</b>	<b>21,085</b>	<b>97.93</b>	<b>Total Liabilities</b>
Total Dana Pihak Ketiga	18,080	18,566	97.38	Total Third-Party Deposits
Giro	1,331	1,341	99.25	Current Account
Tabungan	2,400	4,023	59.66	Savings
Deposito Berjangka	14,348	13,203	108.67	Time Deposits
Surat Berharga	1,349	1,048	128.68	Marketable Securities
Komponen Liabilitas Lainnya	1,220	1,471	82.94	Other Components of Liability
<b>Total Ekuitas</b>	<b>3,011</b>	<b>3,581</b>	<b>84.08</b>	<b>Total Equity</b>
Modal Disetor dan Tambahan Modal Disetor	1,456	2,235	65.17	Fully Paid Capital and Additional Paid-In Capital
Akumulasi Laba/(Rugi)	858	739	116.13	Accumulated Profit/(Loss)
Komponen Ekuitas Lainnya	696	607	114.72	Other Equity Components
<b>RINGKASAN LABA/(RUGI) / SUMMARY OF PROFIT/(LOSS)</b>				
Pendapatan Bunga – neto	418	395	105.87	Interest Income - net
Pendapatan/(Beban) Operasional Selain Bunga – neto	(513)	(202)	253.92	Income/(Expenses) from Operations Other than Interest - net
Laba/(Rugi) Operasional	(95)	193	(49.08)	Operating Profit/(Loss)
Pendapatan/(Beban) Non Operasional – neto	(65)	(85)	76.39	Non-Operating Income/(Expenses) - net
Laba/(Rugi) Sebelum Beban Pajak Penghasilan	(160)	108	(147.83)	Profit/(Loss) before Income Tax Expense
Beban Pajak Penghasilan – neto	41	(22)	(184.49)	Income Tax Expense - net
Laba/(Rugi) Bersih Tahun Berjalan	(119)	86	(138.45)	Net Income/(Loss) for the Year
<b>STRUKTUR MODAL / CAPITAL STRUCTURE</b>				
KPMM untuk Risiko Kredit, Risiko Operasional, dan Risiko Pasar (%)	17.49	20.12	86.93	CAR for Credit Risk, Operational Risk, and Market Risk (%)
<b>TOTAL KANTOR / TOTAL OFFICES</b>				
Kantor Cabang	14	14	100.00	Branch Offices
Kantor Cabang Pembantu	25	24	104.17	Sub-branch Offices
Jaringan Kantor Lain (Kantor Kas, Payment Point, dan Lainnya)	-	0	100.00	Other Office Network (Cash Office, Payment Point, and Others)

\* Merupakan angka PT Bank Victoria International Tbk (induk saja).

\* The figure is for PT Bank Victoria International Tbk (parent only).

## Asumsi dalam Menyusun Proyeksi

Dalam menyusun rencana bisnis Bank digunakan asumsi makro dan mikro dengan memperhatikan kondisi perekonomian saat ini dan perkiraan kondisi perekonomian di masa depan yang diperkirakan akan dan masih dipengaruhi oleh kondisi ekonomi keuangan global dan kebijakan ekonomi pemerintah. Asumsi Makro dan Mikro yang digunakan untuk proyeksi keuangan dalam penyusunan Rencana Bisnis Bank untuk tahun 2022-2024 adalah sebagai berikut.

## Assumptions in Preparing Projections

In drafting the Bank's business plan, macro and micro assumptions are used by considering the current economic condition and forecast of future economic condition, which are expected to be and still be influenced by the global financial economic condition and government economic policy. Macro and Micro assumptions used for financial projections in drafting the Bank's Business Plan for 2022-2024 are as follows.

Uraian	Proyeksi Projections			Description
	2022	2023	2024	
<b>ASUMSI MAKRO / MACRO ASSUMPTIONS</b>				
Pertumbuhan PDB	5.00% - 5.20%	4.50% - 5.50%	4.50% - 5.50%	GDP Growth
Inflasi	3.00%	3.00%	3.00%	Inflation
Lainnya, dirinci per jenis asumsi*				Others, specified per type of assumption*
Kurs IDR/USD	14,350	14,500	14,800	Exchange rate of IDR/USD
BI 7 Days Rate	3.50% - 3.75%	3.50% - 5.00%	3.50% - 5.00%	BI 7 Days Rate
<b>ASUMSI MIKRO / MICRO ASSUMPTIONS</b>				
Pertumbuhan Kredit	6% - 8%	7% - 9%	8% - 10%	Credit Growth
Pertumbuhan Dana Pihak Ketiga	7% - 9%	8% - 10%	9% - 11%	Third Party Deposits Growth
Tingkat Bunga Simpanan Tabungan	3.50% - 8.25%	3.00% - 7.50%	2.50% - 7.00%	Interest Rate on Savings Deposits
Tingkat Bunga Kredit Ritel Komersial	10.75% - 13.50%	10.50% - 13.50%	10.50% - 13.50%	Commercial Retail Loan Interest Rates
Lainnya, dirinci per jenis asumsi**				Others, specified per type of assumption**

\* Asumsi makro lainnya, seperti nilai tukar, pertumbuhan ekspor dan pertumbuhan impor. / Other macro assumptions, such as exchange rates, export growth, and import growth.  
 \*\* Asumsi mikro lainnya, seperti pangsa Bank terhadap industri. / Other micro assumptions, such as the Bank's share of the industry.

## Strategi Pengembangan Bisnis ke Depan

Strategi pengembangan bisnis disusun dan mengacu pada arah kebijakan Bank serta sejalan dengan penetapan tema Rencana Bisnis Bank 2022-2024 untuk "Innovation and Governance for Higher Level Convenience Banking", maka Bank Victoria telah menetapkan langkah-langkah strategis sebagai berikut.

### 1. Strategi Pendanaan dan Pengembangan

Strategi bidang pendanaan diprioritaskan pada upaya menjaga dan meningkatkan loyalitas nasabah serta menambah nasabah baru dengan target pertumbuhan yang berbasis struktur pendanaan yang sehat dan optimal. Beberapa strategi bisnis dan pendekatan teknologi akan dilakukan sebagai berikut.

- a. Melakukan pengembangan secara berkelanjutan dalam *revamping* terhadap *internet banking* dan *mobile banking* yang dilengkapi dengan fitur-fitur dan produk-produk digital yang unggul dan bersaing yang dilengkapi juga dengan pembukaan rekening secara digital melalui teknologi *biometric*, sehingga dapat meningkatkan minat dan ketertarikan nasabah baru serta nasabah *existing* untuk menempatkan dananya dan bertransaksi melalui Bank Victoria;
- b. Melakukan pengembangan secara berkelanjutan dalam *revamping* terhadap *internet banking business* yang didukung dengan fitur-fitur finansial dan non finansial yang juga dilengkapi dengan *cash management* untuk memperlengkapi kebutuhan transaksi keuangan dari perusahaan;
- c. Meningkatkan kualitas layanan guna memenuhi kebutuhan nasabah dengan melakukan pengembangan digital *operations*, yaitu melakukan aktivitas transaksi

## Future Business Development Strategies

The business development strategies are prepared by and refer to the direction of the Bank's policies and are in line with the determination of the Bank Business Plan theme for 2022-2024 of "Innovation and Governance for Higher Level Convenience Banking". Thus, Bank Victoria has determined the following strategic steps.

### 1. Funding and Development Strategies

The funding strategies are prioritized on efforts to maintain and increase customer loyalty and add new customers with a growth target based on a sound and optimal funding structure. Several business strategies and technology approaches to be carried out are as follows.

- a. Conducting sustainable development in revamping internet banking and mobile banking, equipped with superior and competitive digital features and products and also equipped with digital account openings through biometric technology, in order to increase the interest of and attract new customers and existing customers to place funds and make transactions through Bank Victoria;
- b. Conducting sustainable development in revamping the internet banking business, supported by financial and non-financial features and also equipped with cash management to complete the financial transactions required by of the company;
- c. Improving services quality to meet customer needs by developing digital operations, which is by conducting non-cash transaction activities using video banking

non tunai dengan menggunakan teknologi *video banking*, sehingga interaksi bertransaksi dapat dilakukan secara virtual namun tetap mengedepankan prinsip kehati-hatian serta keamanan dalam bertransaksi;

- d. Melakukan kerjasama dengan kementerian, bank, lembaga keuangan non bank, *E-commerce*, *online travel agent*, *peer to peer lending* dan *platform business* (*omni channel*) untuk meningkatkan jumlah nasabah dan frekuensi transaksi;
- e. Membuat beberapa program seperti akuisisi nasabah baru melalui program *CASA plus gimmick* hadiah, program *CASA cashback* atau bunga yang menarik, *loyalty program* untuk meningkatkan dana *CASA*;
- f. Memperkenalkan produk Bank untuk penetrasi ke institusi keuangan non bank untuk meningkatkan dana murah serta diharapkan bisa masuk ke dalam pangsa pasar ritel yang lebih luas lagi; dan
- g. Melakukan promosi-promosi melalui media sosial ataupun membuat kegiatan atau promosi untuk lebih memperkenalkan dan mendekatkan produk-produk Bank Victoria kepada masyarakat.

## 2. Strategi Perkreditan

Strategi bidang perkreditan diprioritaskan pada upaya menjaga dan meningkatkan kualitas kredit dengan target pertumbuhan yang sehat dan berkesinambungan dengan tetap mengacu pada prinsip kehati-hatian (*prudential financing*). Beberapa strategi bisnis yang akan dilakukan pada sektor usaha kredit sebagai berikut.

- Melakukan diversifikasi pada portfolio kredit pada segmen korporasi sebesar 30%, segmen SME sebesar 30%, segmen komersil sebesar 30% dan segmen konsumen sebesar 10%;
- Melakukan kredit *channeling* dengan menjalin kerjasama BPR dan Koperasi guna meningkatkan portofolio kredit dan potensi *fee based income*;
- Memperkenalkan ekosistem digital *lending* untuk memberikan informasi sumber dana debitur kepada Bank dan kecepatan proses kredit Bank kepada debitur;
- Menjaga dan meningkatkan kualitas kredit melalui *monitoring* debitur dan pelaksanaan *early warning*;
- Meningkatkan penyelesaian kredit yang dihapusbuku dan penjualan agunan yang diambilalih termasuk di antaranya melalui penjualan jaminan dan AYDA di situs jaringan (*website*); dan
- Mengoptimalkan program pelatihan yang berkesinambungan untuk meningkatkan kapasitas keahlian tenaga penjualan.

## Informasi Material Setelah Tanggal Laporan Akuntan

Selama tahun 2021, tidak terdapat informasi dan fakta material yang terjadi setelah tanggal laporan akuntan.

technology, so that transaction interactions can be carried out virtually but still prioritizing the principles of prudence and security in making transactions;

- d. Cooperating with ministries, banks, non-bank financial institutions, *E-commerce*, *online travel agents*, *peer to peer lending*, and *business platforms* (*omni channel*) to increase the number of customers and frequency of transactions;
- e. Creating several programs such as acquisition of new customers through *CASA* program plus gift gimmicks, *CASA cashback* program or attractive interest rates, and *loyalty programs* to increase *CASA* funds;
- f. Introducing Bank products to penetrate non-bank financial institutions in order to increase low-cost funds, which are expected to enter into an even wider retail market share; and
- g. Carrying out promotions through social media or conducting activities or promotions to introduce and bring Bank Victoria products closer to the public.

## 2. Loan Strategies

The loan strategies are prioritized on efforts to maintain and improve loan quality with a sound and sustainable growth target while still adhering to the principle of prudence (*prudential financing*). Some of the business strategies that will be carried out in the loan business sector are as follows.

- Diversifying the loan portfolio in corporate segment by 30%, SME segment by 30%, commercial segment by 30%, and consumer segment by 10%;
- Conducting credit channeling by establishing partnerships with Rural Banks and Cooperatives to increase loan portfolio and potential fee-based income;
- Introducing a digital lending ecosystem to provide information of the source of debtor funds to the Bank and the speed of the Bank's loan process to the debtor;
- Maintaining and improving loan quality through monitoring debtors and implementing early warnings;
- Increasing the settlement of written-off loans and the sale of foreclosed collateral, among others, through the sale of collateral and foreclosed assets on the website; and
- Optimizing continuous training programs to increase the skill capacity of the sales force.

## Material Information Subsequent to the Accountant's Reporting Date

Throughout 2021, there were no information and material facts that occurred subsequent to the accountant's reporting date.

## Kebijakan Dividen

### Kebijakan Dividen

Anggaran Dasar Bank Victoria mengatur bahwa besaran dividen disesuaikan dengan kemampuan Bank dan didasarkan pada keputusan RUPS. Hal tersebut dilakukan dengan mempertimbangkan kondisi keuangan dan tingkat kesehatan Bank, serta seluruh peraturan yang relevan di bidang perbankan.

### Pembagian Dividen

Pada tahun buku 2021 dan 2020, Bank tidak melakukan pembagian dividen kepada Pemegang Saham, dikarenakan Bank tidak membukukan laba yang positif.

## Program Kepemilikan Saham oleh Manajemen dan Karyawan

Hingga akhir tahun buku 2021, Bank Victoria tidak melakukan program kepemilikan saham atau *employee stock option plan* (ESOP) dan/atau pemberian opsi pembelian saham kepada manajemen atau *management stock option plan* (MSOP). Hal tersebut sejalan dengan kebijakan internal Bank guna mencegah perdagangan orang dalam.

## Realisasi Penggunaan Dana Hasil Penawaran Umum

Pada 31 Desember 2020, Perseroan telah menggunakan seluruh dana hasil penawaran umum saham sesuai dengan rencana. Dengan demikian, pada tahun 2021, Perseroan tidak memiliki sisa dana hasil penawaran umum untuk dilaporkan.

## Informasi Material Mengenai Investasi, Ekspansi, Divestasi, Akuisisi, atau Restrukturisasi Utang dan Modal

### Investasi

Bank Victoria dan Entitas Anak melakukan investasi dalam efek-efek jangka pendek. Rincian efek-efek yang dimiliki selama tahun 2021 dan 2020 disajikan sebagai berikut.

(dalam juta Rupiah / in million Rupiah)

Uraian	2021	2020	Description
<b>Nilai Wajar melalui Laba Rugi</b>			<b>Fair Value through Profit or Loss</b>
Reksadana	1,001,330	1,736,478	Mutual Funds
Obligasi Pemerintah	34,521	-	Government Bonds
<b>Subtotal</b>	<b>1,035,851</b>	<b>1,736,478</b>	<b>Subtotal</b>
<b>Nilai Wajar melalui Penghasilan Komprehensif Lain</b>			<b>Fair Value through Other Comprehensive Income</b>
Surat Utang Negara	2,273,323	2,164,751	Government Promissory Notes
Surat Berharga Syariah Negara	349,057	465,679	Government Sharia Bonds
Obligasi Korporasi	347,312	412,012	Corporate Bonds

## Dividend Policy

### Dividend Policy

Bank Victoria's Articles of Association stipulate that the dividend amount is adjusted to the Bank's ability and is based on the GMS resolutions. Such matter is done by considering the Bank's financial condition and sound level, as well as all relevant regulations in banking sector.

### Dividend Distribution

In the 2021 and 2020 fiscal years, the Bank did not distribute dividends to Shareholders, due to the Bank did not record positive profits.

## Management/Employee Stock Option Plan (MSOP/ESOP)

Until the end of the 2021 fiscal year, Bank Victoria did not conduct an employee stock option plan (ESOP) and/or grant a management stock option plan (MSOP). This is in line with the Bank's internal policies to prevent insider trading.

## Realization of the Use of Public Offering Proceeds

As of 31 December 2020, the Company has used all proceeds from the public offering of shares according to the plan. Thus, in 2021, the Company does not have any remaining proceeds from the public offering to report.

## Material Information on Investment, Expansion, Divestment, Acquisition, or Debt and Capital Restructuring

### Investment

Bank Victoria and its Subsidiary invest in short-term securities. Details of securities held during 2021 and 2020 are presented as follows.

Uraian	2021	2020	Description
Reksadana	25,184	63,673	Mutual Funds
Wesel Jangka Menengah	30,658	58,000	Medium-Term Notes
Surat Berharga Syariah Korporasi	20,736	17,210	Corporate Sharia Bonds
<b>Subtotal</b>	<b>3,046,271</b>	<b>3,181,324</b>	<b>Subtotal</b>
<b>Biaya Perolehan Diamortisasi</b>			<b>Amortised Cost</b>
Surat Utang Negara	778,225	350,176	Government Promissory Notes
Obligasi Korporasi	151,819	71,580	Corporate Bonds
Surat Berharga Syariah Negara	139,430	214,776	Government Sharia Bonds
Reksadana	20,000	862,000	Mutual Funds
Wesel Jangka Menengah	15,000	-	Medium-Term Notes
<b>Subtotal</b>	<b>1,104,473</b>	<b>1,498,532</b>	<b>Subtotal</b>
<b>Total</b>	<b>5,186,595</b>	<b>6,416,334</b>	<b>Total</b>
<b>Dikurangi</b>			<b>Less</b>
Cadangan Kerugian Penurunan Nilai	(11,109)	(9,663)	Allowance for Impairment Losses
<b>Total</b>	<b>5,175,487</b>	<b>6,406,671</b>	<b>Total</b>

### Ekspansi, Divestasi, dan Akuisisi

Selama tahun 2021, Bank Victoria tidak melakukan kegiatan ekspansi, divestasi, dan akuisisi. Dengan demikian, Perseroan tidak dapat menyajikan informasi terkait tanggal, nilai, objek transaksi, pihak yang melakukan transaksi, sifat hubungan afiliasi, penjelasan mengenai kewajaran transaksi, dan pemenuhan ketentuan terkait kegiatan untuk aktivitas tersebut.

### Restrukturisasi Utang dan/atau Restrukturisasi Modal

Pada tahun 2021, Bank Victoria melakukan transaksi restrukturisasi utang dan/atau restrukturisasi modal yang diuraikan sebagai berikut.

### Expansion, Divestment, and Acquisition

Throughout 2021, Bank Victoria did not conduct any expansion, divestment, and acquisition activities. Thus, the Company cannot provide information regarding the date, value, transaction object, party conducting transaction, nature of affiliation relationship, explanation of the fairness of transaction, and fulfillment of conditions related to the activity.

### Debt Restructuring and/or Capital Restructuring

In 2021, Bank Victoria conducted debt restructuring and/or capital restructuring transactions as described below.

(dalam juta Rupiah / in million Rupiah)

Uraian	2021	2020	Description
<b>Perpanjangan Jangka Waktu, Penurunan Suku Bunga Pinjaman, Penggabungan Fasilitas Penambahan Plafon</b>	<b>3,044,859</b>	<b>3,613,515</b>	<b>Period Extension, Decrease in Loan Interest Rate, Credit Limit Facility Merge</b>
Perpanjangan Jangka Waktu Pinjaman	170,947	118,750	Extension of Credit Period
Penjadwalan Kembali Angsuran dan Perpanjangan Jangka Waktu Pinjaman	3,076,349	3,437,404	Rescheduling of Installments and Extension of Credit Period
Penjadwalan Kembali Angsuran Pinjaman	138,054	-	Rescheduling of Installment Loans
<b>Total Pinjaman yang Direstrukturisasi</b>	<b>6,430,209</b>	<b>7,169,669</b>	<b>Total Restructured Loans</b>
Dikurangi: Cadangan Kerugian Penurunan Nilai	(609,957)	(448,143)	Less: Allowance for Impairment Losses
<b>Total</b>	<b>5,820,252</b>	<b>6,721,526</b>	<b>Total</b>

### Alasan Dilakukannya Transaksi

Bank melakukan restrukturisasi dan relaksasi pinjaman yang diberikan sebagai dampak dari pandemi Covid-19.

### Penjelasan Mengenai Kewajaran Transaksi

Bank melakukan restrukturisasi pinjaman dilakukan secara wajar, sesuai dengan ketentuan yang berlaku.

### Reasons for Conducting Transactions

The Bank conducted restructuring and provided relaxation on loans affected by the Covid-19 pandemic.

### Explanation of Transaction Fairness

The Bank conducted restructuring on loans in a reasonable manner, according to the applicable provisions.

### Pemenuhan Ketentuan Terkait

Untuk memenuhi peraturan Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2020 tanggal 16 Maret 2020 tentang Stimulus Perekonomian Nasional sebagai Kebijakan *Countercyclical* Dampak Penyebaran Covid-19 yang kemudian diperbaharui dengan Peraturan Otoritas Jasa Keuangan No. 48/POJK.03/2020 tanggal 1 Desember 2020.

### Pernyataan Dewan Komisaris dan Direksi

Dewan Komisaris dan Direksi Bank Victoria menyatakan bahwa restrukturisasi pinjaman yang dilakukan Bank telah sesuai dengan ketentuan yang terkandung dalam Peraturan Otoritas Jasa Keuangan No. 48/POJK.03/2020 tanggal 1 Desember 2020.

## Informasi Transaksi Material yang Mengandung Benturan Kepentingan

Selama tahun 2021, Bank Victoria dan Entitas Anak tidak melakukan transaksi material yang mengandung benturan kepentingan.

## Informasi Transaksi dengan Pihak Afiliasi

Pada tahun 2021, Bank melakukan transaksi dengan pihak afiliasi yang diuraikan sebagai berikut.

### Fulfillment of Relevant Provisions

To comply with Financial Services Authority Regulation No. 11/POJK.03/2020 dated 16 March 2020 on the National Economic Stimulus as a Countercyclical Policy on the Impact of the Covid-19, which was then updated by Financial Services Authority Regulation No. 48/POJK.03/2020 dated 1 December 2020.

### Statement of Board of Commissioners and Board of Directors

The Board of Commissioners and Board of Directors of Bank Victoria stated that the loan restructuring carried out by the Bank was in accordance with the provisions contained in the Financial Services Authority Regulation No. 48/POJK.03/2020 dated 1 December 2020.

## Information on Material Transaction with Conflict of Interest

Throughout 2021, Bank Victoria and its Subsidiary did not conduct any material transactions containing conflict of interest.

## Information of Transaction with Affiliated Parties

In 2021, the Company made transactions with affiliated parties as shown below.

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Jenis Transaksi Type of Transactions	Alasan Dilakukannya Transaksi Reason for Conducting Transaction	Realisasi Transaksi Transaction Realization (Rp)
7 Januari 2021 7 January 2021	Bank Victoria Dengan PT Tri Daya Investindo Bank Victoria and PT Tri Daya Investindo	<ul style="list-style-type: none"> <li>PT Tri Daya Investindo dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%;</li> <li>PT Bhuwanatala Indah Permai Tbk dimiliki sahamnya oleh PT Safire Capital Ltd sebesar 71,49%;</li> <li>PT Safire Capital Ltd dimiliki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100,00%; dan</li> <li>Chemical Asia Corporation Pte Ltd dimiliki sahamnya oleh Louise Li sebesar 99,52% dan merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali).</li> <li>PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Tri Daya Investindo;</li> <li>PT Safire Capital Ltd owns 71.49% shares of PT Bhuwanatala Indah Permai Tbk;</li> <li>Chemical Asia Corporation Pte Ltd owns 100.00% shares of PT Safire Capital Ltd; and</li> <li>Louise Li owns 99.52% shares of Chemical Asia Corporation Pte Ltd and is a son of Ms. Suzanna Tanojo (Controlling Shareholder).</li> </ul>	Menyewakan ruang Kantor di Gedung The Victoria Lt. Dasar dengan luas ±60 m <sup>2</sup> untuk periode 1 Februari 2021-31 Januari 2024 kepada PT Tri Daya Investindo. Renting out office space at The Victoria Building Ground Floor of an area of ±60 m <sup>2</sup> for the period of 1 February 2021-31 January 2024 to PT Tri Daya Investindo.	<ul style="list-style-type: none"> <li>Menyewakan ruang kantor di Gedung The Victoria ini dapat meningkatkan sinergi antar Group Victoria.</li> <li>Renting out office space at The Victoria Building can increase the synergy within the Victoria Group.</li> </ul>	898,920,000



Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Jenis Transaksi Type of Transactions	Alasan Dilakukannya Transaksi Reason for Conducting Transaction	Realisasi Transaksi Transaction Realization (Rp)
2 Februari 2021 2 February 2021	Bank Victoria dengan PT Victoria Insurance Tbk Bank Victoria and PT Victoria Insurance Tbk	<ul style="list-style-type: none"> <li>PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,96%; dan</li> <li>PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 45,74%.</li> <li>PT Victoria Investama Tbk owns 72.96% shares of PT Victoria Insurance Tbk; and</li> <li>PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with 45.74% shares.</li> </ul>	<p>Perlindungan asuransi <i>cash, bank notes, currency notes</i>, yang berada dalam brankas/<i>chasier box</i> untuk periode 2 Februari 2021-2 Februari 2022.</p> <p>Insurance protection for cash, bank notes, currency notes, which are in a safe/<i>cashier box</i> for the period of 2 February 2021-2 February 2022.</p>	<ul style="list-style-type: none"> <li>Asuransi <i>Cash in Save</i> (CIS) dari PT Victoria Insurance Tbk dapat memberikan benefit proteksi <i>all risk of physical loss of or damage</i> untuk <i>cash, bank notes, currency notes, cheque, postal order</i> atau <i>money order</i> atas 52 lokasi kantor PT Bank Victoria International Tbk.</li> <li>Cash in Save (CIS) insurance from PT Victoria Insurance Tbk can provide protection benefits for all risk of physical loss of or damage for cash, bank notes, currency notes, checks, postal orders, or money orders for 52 office locations of PT Bank Victoria International Tbk.</li> </ul>	82,665,619
17 Februari 2021 17 February 2021	Bank Victoria dengan PT Victoria Insurance Tbk Bank Victoria and PT Victoria Insurance Tbk	<ul style="list-style-type: none"> <li>PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,96%; dan</li> <li>PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 45,74%.</li> <li>PT Victoria Investama Tbk owns 72.96% shares of PT Victoria Insurance Tbk; and</li> <li>PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 45,74%.</li> </ul>	<p>Menyewakan ruang kantor Bank Victoria KC Surabaya Lt. 4 dengan luas 72 m<sup>2</sup> untuk periode 1 Maret 2021-1 Maret 2023 kepada PT Bank Victoria Syariah yang digunakan sebagai kantor.</p> <p>Renting out office space of Bank Victoria Branch Office Surabaya 4<sup>th</sup> Floor of an area of 72 m<sup>2</sup> for the period of 1 March 2021-1 March 2023 to PT Bank Victoria Syariah, which is used as an office.</p>	<p>Memaksimalkan fungsi ruangan serta meningkatkan sinergi dan <i>cross selling</i> antar Group Victoria.</p> <p>Maximizing the function of the room and increasing the synergy and cross selling within Victoria Group.</p>	142,560,000
1 Maret 2021 1 March 2021	Bank Victoria dengan PT Victoria Insurance Tbk Bank Victoria and PT Victoria Insurance Tbk	<ul style="list-style-type: none"> <li>PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,96%; dan</li> <li>PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 46,29%.</li> <li>PT Victoria Investama Tbk owns 72.96% shares of PT Victoria Insurance Tbk; and</li> <li>PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 46,29%.</li> </ul>	<p>Perlindungan asuransi gedung (<i>building and inventory</i>) untuk 38 lokasi Bank Victoria.</p> <p>Building and inventory insurance coverage for 38 locations of Bank Victoria.</p>	<ul style="list-style-type: none"> <li>Melakukan kerja sama dengan PT Victoria Insurance Tbk untuk polis asuransi <i>property all risk</i> atas 38 lokasi kantor Bank Victoria dengan objek pertanggungans berupa kerusakan atau kerugian pada harta benda akibat kebakaran, bencana alam, kerusuhan, atau kerusakan lainnya untuk periode 1 Maret 2021-1 Maret 2022; dan</li> <li>Asuransi <i>property all risk</i> dari PT Victoria Insurance Tbk dapat memberikan benefit proteksi <i>all risk</i> berupa kerusakan atau kerugian pada harta benda akibat kebakaran, bencana alam, kerusuhan, atau kerusakan lainnya atas 38 lokasi kantor Bank Victoria.</li> <li>Collaborating with PT Victoria Insurance Tbk for a property all risk insurance policy for 38 locations of Bank Victoria offices with the coverage object of damage or loss to property due to fire, natural disasters, riots, or other damage for the period of 1 March 2021-1 March 2022; and</li> </ul>	142,994,309



Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Jenis Transaksi Type of Transactions	Alasan Dilakukannya Transaksi Reason for Conducting Transaction	Realisasi Transaksi Transaction Realization (Rp)
7 Juni 2021 7 June 2021	Bank Victoria Dengan PT Bank Victoria Syariah Bank Victoria and PT Bank Victoria Syariah	<ul style="list-style-type: none"> <li>Bank Victoria merupakan Pemegang Saham Pengendali PT Bank Victoria Syariah; dan</li> <li>PT Bank Victoria Syariah dimiliki sahamnya oleh Bank Victoria sebesar 99,99%.</li> <li>Bank Victoria is a Controlling Shareholder of PT Bank Victoria Syariah; and</li> <li>Bank Victoria owns 99.99% shares of PT Bank Victoria Syariah.</li> </ul>	<p>Menyewakan ruang Kantor Bank Victoria KCP Grand Boutique Mangga Dua Lt. 4 untuk periode 1 Juli 2021-31 Desember 2021 kepada PT Bank Victoria Syariah yang digunakan sebagai ruang penempatan dokumen.</p> <p>Renting out office space at Bank Victoria's Sub-Branch Office of Grand Boutique Mangga Dua 4<sup>th</sup> Floor for the period of 1 July 2021-31 December 2021 to PT Bank Victoria Syariah, which is used as room for document placement.</p>	<ul style="list-style-type: none"> <li>Property all risk insurance from PT Victoria Insurance Tbk can provide all risk protection benefits from damage or loss to property due to fire, natural disasters, riots, or other damage to 38 locations of Bank Victoria offices.</li> </ul> <p>Memaksimalkan fungsi ruangan serta meningkatkan sinergi dan <i>cross selling</i> antar Group Victoria.</p> <p>Maximizing the function of the room and increasing the synergy and <i>cross selling</i> within Victoria Group.</p>	22,000,000
1 September 2021 1 September 2021	Bank Victoria dengan PT Victoria Insurance Tbk Bank Victoria and PT Victoria Insurance Tbk	<ul style="list-style-type: none"> <li>PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan</li> <li>PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 43,59%.</li> <li>PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and</li> <li>PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 43.59%.</li> </ul>	<p>Perlindungan asuransi gedung (<i>building and inventory</i>).</p> <p>Building and inventory insurance protection.</p>	<ul style="list-style-type: none"> <li>Melakukan kerja sama dengan PT Victoria Insurance Tbk untuk polis asuransi <i>property all risk</i> atas 38 lokasi kantor Bank Victoria dengan objek pertanggungan berupa kerusakan atau kerugian pada harta benda akibat kebakaran, bencana alam, kerusakan, atau kerusakan lainnya untuk periode 1 September 2021-1 September 2022; dan</li> <li>Asuransi <i>property all risk</i> dari PT Victoria Insurance Tbk dapat memberikan benefit proteksi <i>all risk</i> berupa kerusakan atau kerugian pada harta benda akibat kebakaran, bencana alam, kerusakan, atau kerusakan lainnya atas 38 lokasi kantor Bank Victoria.</li> <li>Collaborating with PT Victoria Insurance Tbk for property all risk insurance policy for 38 locations of Bank Victoria offices with the coverage object of damage or loss to property due to fire, natural disasters, riots, or other damage for the period of 1 September 2021-1 September 2022; and</li> <li>Property all risk insurance from PT Victoria Insurance Tbk can provide all risk protection benefits from damage or loss to property due to fire, natural disasters, riots, or other damage to 38 locations of Bank Victoria offices.</li> </ul>	120,503,001

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Jenis Transaksi Type of Transactions	Alasan Dilakukannya Transaksi Reason for Conducting Transaction	Realisasi Transaksi Transaction Realization (Rp)
1 September 2021 1 September 2021	Bank Victoria dengan PT Victoria Insurance Tbk Bank Victoria and PT Victoria Insurance Tbk	<ul style="list-style-type: none"> <li>PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan</li> <li>PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 43,59%.</li> <li>PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and</li> <li>PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 43.59%.</li> </ul>	<p>Perlindungan asuransi <i>cash, bank notes, currency notes, cheque, postal order</i> atau <i>money order</i> terhadap risiko perampokan selama dalam perjalanan saat pengangkutan/ pengiriman.</p> <p>Insurance protection for cash, bank notes, currency notes, checks, postal orders, or money orders against the risk of robbery during transportation/ delivery.</p>	<ul style="list-style-type: none"> <li>Melakukan kerjasama dengan PT Victoria Insurance Tbk untuk polis asuransi <i>cash in transit</i> (CIT) atas 41 lokasi kantor Bank Victoria untuk periode 1 September 2021- 1 September 2022; dan</li> <li>Asuransi CIT dari PT Victoria Insurance Tbk dapat memberikan benefit <i>proteksi all risk of physical loss of or damage</i> untuk <i>cash, bank notes, currency notes, cheque, postal order</i> atau <i>money order</i> atas 41 lokasi kantor Bank Victoria.</li> <li>Cooperating with PT Victoria Insurance Tbk for cash in transit (CIT) insurance policies for 41 Bank Victoria office locations for the period 1 September 2021-1 September 2022; and</li> <li>CIT Insurance from PT Victoria Insurance Tbk can provide all risk of physical loss of or damage protection benefits for cash, bank notes, currency notes, checks, postal orders, or money orders for 41 locations of Bank Victoria offices.</li> </ul>	422,400,000
1 Desember 2021 1 Desember 2021	Bank Victoria dengan PT Victoria Insurance Tbk Bank Victoria and PT Victoria Insurance Tbk	<ul style="list-style-type: none"> <li>PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan</li> <li>PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 43,59%.</li> <li>PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and</li> <li>PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 43.59%.</li> </ul>	<p>Perlindungan asuransi <i>total loss only and comprehensive</i> atas 26 unit aset Bank Victoria berupa kendaraan bermotor (mobil dan motor).</p> <p>Total loss only and comprehensive insurance cover for 26 units of Bank Victoria assets in the forms of motor vehicles (cars and motorcycles).</p>	<ul style="list-style-type: none"> <li>Melakukan kerjasama dengan PT Victoria Insurance Tbk untuk polis asuransi kendaraan atas 26 unit kendaraan bermotor (mobil dan motor) Bank Victoria untuk periode 1 Desember 2021-1 Desember 2022; dan</li> <li>Polis asuransi kendaraan dari PT Victoria Insurance Tbk dapat memberikan manfaat proteksi (<i>total loss only and comprehensive</i>) untuk aset Bank Victoria berupa 26 unit kendaraan bermotor (mobil dan motor).</li> <li>Cooperating with PT Victoria Insurance Tbk for vehicle insurance policies for 26 units of motor vehicles (cars and motorcycles) of Bank Victoria for the period of 1 December 2021-1 December 2022; and</li> <li>Vehicle insurance policies from PT Victoria Insurance Tbk can provide protection benefits (total loss only and comprehensive) for Bank Victoria's assets in the forms of 26 units of motor vehicles (cars and motorcycles).</li> </ul>	75,390,449

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Jenis Transaksi Type of Transactions	Alasan Dilakukannya Transaksi Reason for Conducting Transaction	Realisasi Transaksi Transaction Realization (Rp)
16 Desember 2021 16 Desember 2021	Bank Victoria Dengan PT Bank Victoria Syariah Bank Victoria and PT Bank Victoria Syariah	PT Bank Victoria Syariah merupakan perusahaan terkendali atau Entitas Anak yang sahamnya dimiliki Bank Victoria sebesar 99,99%. PT Bank Victoria Syariah is a controlled company or Subsidiary whose 99.99% shares are owned by Bank Victoria.	Bank Victoria menandatangani perjanjian sewa menyewa dengan PT Bank Victoria Syariah atas ruangan seluas 168 m <sup>2</sup> yang terletak di Grand Boutique Center Blok D Kav 1 Lt. 4 Mangga Dua untuk periode 1 Januari 2022-31 Desember 2022. Bank Victoria signed a lease agreement with PT Bank Victoria Syariah for a 168 m <sup>2</sup> room located at Grand Boutique Center Block D Kav 1 4 <sup>th</sup> Floor Mangga Dua for the period of 1 January 2022-31 December 2022.	<ul style="list-style-type: none"> <li>• Mewujudkan sinergi antar Bank Victoria dan PT Bank Victoria Syariah;</li> <li>• Memaksimalkan fungsi ruangan untuk dapat diberikan hak sewa kepada Entitas Anak; dan</li> <li>• Memberikan <i>financial benefit</i> kepada Bank Victoria.</li> <li>• Realizing the synergy between Bank Victoria and PT Bank Victoria Syariah;</li> <li>• Maximizing the function of the room to grant rental rights to Subsidiary; and</li> <li>• Providing financial benefits to Bank Victoria.</li> </ul>	44,000,000

### Kewajaran dan Mekanisme Tinjauan Transaksi

Seluruh transaksi afiliasi dilakukan secara wajar, sesuai dengan ketentuan yang berlaku.

### Pemenuhan Peraturan dan Ketentuan

Untuk memenuhi peraturan Bapepam-LK No.IX.E.1 butir 2 (dua) huruf b angka 3 (tiga) dan huruf c angka 4 (empat), Lampiran Keputusan Ketua Bapepam dan LK No. KEP-412/BL/2009 tanggal 25 November 2009 tentang Transaksi Afiliasi dan Benturan Kepentingan Transaksi tertentu, Bank Victoria telah melakukan pelaporan transaksi dengan pihak berelasi yang memenuhi kategori transaksi afiliasi. Seluruh transaksi afiliasi telah dilaporkan pada Otoritas jasa Keuangan.

### Informasi Transaksi dengan Pihak Berelasi

Dalam kegiatan usahanya, Bank Victoria melakukan transaksi-transaksi tertentu dengan pihak-pihak yang berelasi dengan persyaratan dan kondisi yang sama seperti yang diberlakukan kepada pihak ketiga. Pihak yang dikategorikan sebagai pihak yang berelasi dengan Bank adalah Pemegang Saham, Komisaris, Direksi, Pejabat Eksekutif dan Personil Manajemen Kunci di mana transaksi tersebut meliputi kegiatan pokok/utama Bank seperti pemberian pinjaman dan penghimpunan dana.

### Nama dan Sifat Hubungan Berelasi

Pihak-pihak berelasi berdasarkan sifat dari hubungan dan transaksi ditunjukkan sebagai berikut.

### Fairness of and Mechanism of Transaction Review

All affiliated transactions were carried out appropriately in accordance with the applicable provisions.

### Compliance with Regulations and Provisions

To comply with Bapepam-LK Regulation No. IX.E.1 point 2 (two) letter b number 3 (three) and letter c number 4 (four), Attachment to the Decision of Chairman of Bapepam and LK No. KEP-412/BL/2009 dated 25 November 2009 on Affiliated Transactions and Conflicts of Interest of Certain Transactions, Bank Victoria has reported its transactions with related parties that meet the affiliated transaction categories. All affiliated transactions have been reported to the Financial Services Authority.

### Information of Transaction with Related Parties

In its business activities, Bank Victoria makes certain transactions with related parties under the same terms and conditions as those applied to third parties. Parties categorized as parties related to the Bank are Shareholders, Commissioners, Directors, Executive Officers, and Key Management Personnel in which the transactions include the main/primary activities of the Bank such as providing loans and raising funds.

### Name and Nature of Relationships

The related parties based on the nature of the relationship and transaction are shown below.

<b>Pihak Berelasi Related Parties</b>	<b>Sifat dari Hubungan Nature of Relationship</b>	<b>Sifat dari Transaksi Nature of Transaction</b>
PT Victoria Investama Tbk	Pemegang Saham Shareholder	Simpanan nasabah, pinjaman yang diberikan Deposits from customers, loans
PT Victoria Sekuritas Indonesia	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah, pinjaman yang diberikan Deposits from customers, loans
PT Grha Swahita	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah, pinjaman yang diberikan Deposits from customers, loans
PT Merak Energi Indonesia	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah, pinjaman yang diberikan Deposits from customers, loans
PT Tridaya Investindo	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah, pinjaman yang diberikan Deposits from customers, loans
PT Victoria Insurance Indonesia	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah, asuransi aset tetap Deposits from customers, fixed assets insurance
PT Padi Unggul Indonesia	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah, pinjaman yang diberikan Deposits from customers, loans
PT Victoria Alife Indonesia	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Victoria Manajemen Investasi	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT BIP Loka Kencana	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT BIP Sentosa	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Studio One	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Asri Kencana Gemilang	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Artoda Karya Gemilang	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Bhuwanatala Indah Permai	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Frogurt Sari Indonesia	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Emperor Finance Indonesia	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Grata Mulia Pratama	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Putra Asih Laksana	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Suryayudha Investindo Cipta	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT GMT Investama Mandiri Tbk	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Dwimagna Kapital Indonesia	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Jaya Bhakti Mandiri	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah dan Pinjaman yang Diterima Deposits from customers and Borrowings
PT Magna Investa Mandiri	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Bintang Jaya Bara Sentosa	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT BIP Boga Entertainment	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT BIP Boga Permai	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers

Pihak Berelasi Related Parties	Sifat dari Hubungan Nature of Relationship	Sifat dari Transaksi Nature of Transaction
PT Bumi Semesta Lestari	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Cahaya Medika Health Care	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah dan Pinjaman yang Diterima Deposits from customers and Borrowings
PT Prolestari Mega Persada	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Regis Pratama Indonesia	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Surya Cakra Multi Sarana	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Verena Kapital	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Sulfindo Adiusaha	Dimiliki oleh Pemegang Saham Utama Owned by Main Shareholder	Simpanan nasabah Deposits from customers
PT Nata Patindo	Pemegang Saham Shareholder	Simpanan nasabah Deposits from customers
Suzanna Tanojo	Pemegang Saham Pengendali Controlling Shareholder	Simpanan nasabah Deposits from customers
Christine Tanojo	Pemegang Saham Shareholder	Simpanan nasabah Deposits from customers
Luciana Tanoyo	Hubungan keluarga dengan Suzanna Tanojo Family relationship with Suzanna Tanojo	Simpanan nasabah Deposits from customers
Dewan Komisaris, Direksi, dan Pejabat Eksekutif Grup Board of Commissioners, Board of Directors, and Executive Officers of the Group	Manajemen dan karyawan kunci Key management and personnel	Simpanan nasabah, pinjaman yang diberikan Deposits from customers, loans
Dewan Komisaris, Direksi, dan Pejabat Eksekutif Entitas Asosiasi Board of Commissioners, Board of Directors, and Executive Officers of Associates	Manajemen dan karyawan kunci Key management and personnel	Simpanan nasabah, pinjaman yang diberikan Deposits from customers, loans

### Realisasi Transaksi Pihak Berelasi

Adapun rincian saldo dengan pihak-pihak berelasi diuraikan sebagai berikut.

### Actual Related Party Transactions

Details of balances with related parties are described as follows.

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Description
<b>ASET / ASSETS</b>			
Pinjaman yang Diberikan - bruto			Loans-gross
PT Merak Energi Indonesia	138,455	146,059	PT Merak Energi Indonesia
PT Grha Swahita	22,231	30,730	PT Grha Swahita
PT Tri Daya Investindo (sebelumnya PT BIP Tridaya Propertindo)	17,328	17,991	PT Tri Daya Investindo (formerly PT BIP Tridaya Propertindo)
PT Cahaya Medika Health Care	3	-	PT Cahaya Medika Health Care
PT Jaya Bhakti Mandiri	1	-	PT Jaya Bhakti Mandiri
PT Victoria Investama Tbk	18,228	7,195	PT Victoria Investama Tbk
PT Victoria Insurance Indonesia	1,355	-	PT Victoria Insurance Indonesia
PT Victoria Sekuritas Indonesia	-	12,406	PT Victoria Sekuritas Indonesia
Dewan Komisaris, Direksi, dan Pejabat Eksekutif Entitas Asosiasi	10,121	13,564	Board of Commissioners, Board of Directors, and Executive Officers of Associates
Dewan Komisaris, Direksi, dan Pejabat Eksekutif Grup	111,330	9,472	Board of Commissioners, Board of Directors, and Executive Officers of the Group
<b>Jumlah</b>	<b>298,811</b>	<b>237,416</b>	<b>Total</b>
<b>Persentase terhadap Jumlah Aset (%)</b>	<b>0.87</b>	<b>0.91</b>	<b>Percentage to Total Assets (%)</b>

Uraian	2021	2020	Description
<b>LIABILITAS / LIABILITIES</b>			
Simpanan Nasabah			Deposits from Customers
Giro	76,052	20,653	Current Account
Tabungan	28,314	42,036	Savings
Deposito Berjangka	607,935	210,855	Time Deposits
<b>Jumlah</b>	<b>712,301</b>	<b>273,543</b>	<b>Total</b>
<b>Persentase terhadap Jumlah Liabilitas (%)</b>	<b>3.44</b>	<b>1.23</b>	<b>Percentage to Total Liabilities (%)</b>
Dana Syirkah Temporer			Temporary Syirkah Fund
Deposito Mudharabah	3,075	2.655.000	Mudharabah Time Deposits
Tabungan Mudharabah	209	268	Mudharabah Savings Deposits
Giro Mudharabah	9	-	Mudharabah Current Account
<b>Jumlah</b>	<b>3,293</b>	<b>268</b>	<b>Total</b>
<b>Persentase terhadap Dana Syirkah Temporer (%)</b>	<b>0.27</b>	<b>0.02</b>	<b>Percentage to Temporary Syirkah Fund (%)</b>
Pendapatan Bunga dan Syariah	49,096	22,296	Interest and Sharia Income
<b>Persentase terhadap Jumlah Pendapatan Bunga dan Syariah (%)</b>	<b>3.05</b>	<b>1.25</b>	<b>Percentage to Total Interest and Sharia Income (%)</b>
Beban Bunga dan Syariah	13,728	12,249	Interest and Sharia Expenses
<b>Persentase terhadap Jumlah Beban Bunga (%)</b>	<b>1.20</b>	<b>0.77</b>	<b>Percentage to Total Interest Expenses (%)</b>
Gaji dan Tunjangan Dewan Komisaris, Direksi, dan Pejabat Eksekutif	41,416	45,080	Salaries and Allowances of Board of Commissioners, Board of Directors, and Executive Officers
<b>Persentase terhadap Jumlah Beban Tenaga Kerja (%)</b>	<b>28.56</b>	<b>25.72</b>	<b>Percentage to Total Personnel Expenses (%)</b>
<b>Liabilitas Komitmen dan Kontinjensi</b>			<b>Liabilities Commitments and Contingencies</b>
<b>Komitmen dan Kontinjensi</b>			<b>Commitments and Contingencies</b>
Fasilitas Pinjaman yang Belum Digunakan	(37,329)	(7,320)	Unused Loan Facilities
<b>Jumlah</b>	<b>(37,329)</b>	<b>(7,320)</b>	<b>Total</b>
<b>Persentase terhadap Jumlah Liabilitas Komitmen dan Kontinjensi - bersih (%)</b>	<b>1.16</b>	<b>0.29</b>	<b>Percentage to Total Liabilities of Commitments and Contingencies - net (%)</b>

### Kewajaran dan Alasan Dilakukan Transaksi

Transaksi dengan pihak berelasi telah dilakukan secara wajar sesuai dengan kepentingan Bank (*Arm's Length Transaction*). Seluruh transaksi dengan pihak berelasi dilaksanakan atas dasar alasan kebutuhan usaha Bank Victoria serta ditujukan untuk meningkatkan kinerja Bank.

### Kebijakan Mekanisme Review atas Transaksi dan Pemenuhan Peraturan Terkait

Mengacu pada Peraturan Bank Indonesia No. 7/3/PBI/2005 tentang Batas Maksimum Pemberian Kredit Industri Perbankan, yang telah diubah dengan PBI No. 8/13/PBI/2006 tentang Perubahan Atas Peraturan Bank Indonesia No. 7/3/PBI/2005 tentang Batas Maksimum Pemberian Kredit Industri Perbankan, Bank wajib menerapkan prinsip kehati-hatian dan manajemen risiko dalam memberikan Penyediaan Dana, khususnya Penyediaan Dana Kepada Pihak Terkait dan atau Penyediaan Dana Besar, dan Surat Keputusan Direksi No. 017/SK-DIR/06/13 tanggal 18 Juni 2013 tentang Unit Kerja Pengkonsolidasi Batas Maksimum Pemberian Kredit (BMPK) menunjuk Divisi Kepatuhan sebagai Unit Kerja yang bertugas mengelola informasi eksposur BMPK terkait.

### Fairness in and Reasons for Making Transactions

Transactions with related parties have been conducted fairly in accordance with the Bank's interests (*Arm's Length Transaction*). All transactions with related parties are carried out on the grounds of the business needs of Bank Victoria and are aimed at improving the Bank's performance.

### Review Mechanism Policy on Transactions and Compliance with Related Regulations

Referring to Bank Indonesia Regulation No. 7/3/PBI/2005 on Legal Lending Limit for Banking Industry, as amended by Bank Indonesia Regulation No. 8/13/PBI/2006 on Amendment to Bank Indonesia Regulation No. 7/3/PBI/2005 on Legal Lending Limit for Banking Industry, the Bank must apply prudential principles and risk management in Funding, especially Funding to Related Parties and/or Large Exposures, and the Board of Directors' Decision Letter No. 017/SK-DIR/06/13 dated 18 June 2013 on Legal Lending Limit (LLL) Consolidation Work Unit, the Compliance Division is appointed as the Work Unit tasked with processing information on related LLL exposure.

## Komitmen dan Kontinjensi

Bank memiliki komitmen dan kontinjensi, ikhtisar komitmen dan kontinjensi Bank yang dinyatakan dalam nilai kontrak sebagai berikut.

## Commitments and Contingencies

The Bank has commitments and contingencies. Summary of the Bank's commitments and contingencies stated in the contract value is as follows.

(dalam juta Rupiah / in million Rupiah)

Uraian	2021	2020	Description
<b>KOMITMEN / COMMITMENTS</b>			
<b>Liabilitas Komitmen</b>			<b>Commitment Liability</b>
Fasilitas Pinjaman yang Belum Digunakan			Unused Loan Facilities
Pihak Berelasi	(37,329)	(7,320)	Related Parties
Pihak Ketiga	(3,251,258)	(2,472,647)	Third Parties
<b>Liabilitas Komitmen – neto</b>	<b>(3,288,587)</b>	<b>(2,479,966)</b>	<b>Commitment Liabilities - net</b>
<b>KONTINJENSI / CONTINGENCIES</b>			
<b>Tagihan Kontinjensi</b>			<b>Contingency Receivables</b>
Pendapatan Bunga atas Pinjaman Bermasalah - Pihak Ketiga	443,666	357,137	Interest Receivables in Non-Performing Loans– Third Parties
<b>Liabilitas Kontinjensi</b>			<b>Contingency Liability</b>
Garansi yang Diterbitkan – Pihak Berelasi	(2,498)	-	Issued Guarantees– Related Parties
Garansi yang Diterbitkan – Pihak Ketiga	(365,544)	(368,503)	Issued Guarantees–Third Parties
Letter of Credit	(2,523)	(1,761)	Letter of Credit
<b>Kontinjensi - neto</b>	<b>73,102</b>	<b>(13,126)</b>	<b>Contingencies - net</b>
<b>Jumlah Liabilitas Komitmen dan Kontinjensi – neto</b>	<b>(3,215,486)</b>	<b>(2,493,093)</b>	<b>Total Liabilities Commitment and Contingencies - net</b>

## Larangan, Batasan, dan/atau Hambatan Signifikan untuk Melakukan Transfer Dana antara Bank dan Entitas Lain dalam Satu Kelompok Usaha

Bank Victoria tidak memiliki pembatasan dalam prosedur operasional terkait transfer dana nasabah, baik dalam bentuk transfer masuk maupun transfer keluar antara Bank dan entitas lain dalam satu kelompok usahanya. Dalam menyalurkan pinjaman ke pihak ketiga dan entitas lainnya dalam satu kelompok usaha, Bank Victoria mengacu pada BMPK yang telah dibuat oleh Divisi *Financing & Accounting* dan dipantau oleh Divisi *Compliance/Integrated, AML, & System Procedure* dan Divisi *Credit Risk Review*.

## Prohibitions, Limitations, and/ or Significant Hindrances to Perform Fund Transfer between the Bank and Other Entities in One Business Group

Bank Victoria has no restrictions in operational procedures regarding Customer's fund transfer either incoming and outgoing transfers between the Bank and other entities within its business group. In providing loans to third parties and other entities within a business group, Bank Victoria refers to LLL formulated by the Financing & Accounting Division, and the activity is monitored by the Compliance/Integrated, AML, & System Procedure Division and Credit Risk Review Division.

## Perubahan Peraturan Perundang-undangan yang Berpengaruh Signifikan terhadap Kinerja Bank

Perubahan peraturan perundang-undangan yang berpengaruh terhadap Bank Victoria serta dampak mengenai perubahan tersebut diuraikan sebagai berikut.

## Amendments to Laws and Regulations with Significant Impacts on the Bank's Performance

Amendments to laws and regulations that affect Bank Victoria and the impact of these amendments are described as follows.



Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
<b>PERATURAN BANK INDONESIA / BANK INDONESIA REGULATIONS</b>				
28 Januari 2021 28 January 2021	No. 23/1/PBI/2021	Jumlah dan Nilai Nominal Uang Rupiah yang Dimusnahkan Tahun 2020.  Amount and Nominal Value of Rupiah Currency Destroyed in 2020.	Tidak ada dampak bagi Bank Victoria. No impact on Bank Victoria.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/1/PBI/2021.  Following the provisions in accordance with Bank Indonesia Regulation No. 23/1/PBI/2021.
1 Maret 2021 1 March 2021	No. 23/2/PBI/2021	Perubahan Ketiga atas Peraturan Bank Indonesia No. 20/8/PBI/2018 tentang Rasio <i>Loan to Value</i> untuk Kredit Properti, Rasio <i>Financing to Value</i> Untuk Pembiayaan Properti, dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor.  Third Amendment to Bank Indonesia Regulation No. 20/8/PBI/2018 on Loan to Value Ratio for Property Credit, Financing to Value Ratio for Property Financing, and Down Payment for Motor Vehicles Credit or Financing.	Secara umum kredit/pembiayaan perbankan masih dalam proses pemulihan. Bank Indonesia mendukung pemulihan ekonomi nasional, kebijakan makroprudensial yang bersifat akomodatif untuk mendorong sektor perbankan menjalankan fungsi intermediasi yang seimbang dan berkualitas.  In general, bank loan/financing is still in the recovery process. Bank Indonesia supports the national economic recovery, the accommodative	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/2/PBI/2021.  Following the provisions in accordance with Bank Indonesia Regulation No. 23/2/PBI/2021.
25 Maret 2021 25 March 2021	No. 23/3/PBI/2021	Perubahan Ketiga atas Peraturan Bank Indonesia No. 20/10/PBI/2018 tentang Transaksi <i>Domestic Non-Deliverable Forward</i> .  Third Amendment to Bank Indonesia Regulation No. 20/10/PBI/2018 on Domestic Non-Deliverable Forward Transactions.	Tidak ada dampak bagi Bank Victoria. No impact on Bank Victoria.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/3/PBI/2021.  Following the provisions in accordance with Bank Indonesia Regulation No. 23/3/PBI/2021.
5 April 2021	No. 23/4/PBI/2021	Perubahan Keempat atas Peraturan Bank Indonesia No. 15/17/PBI/2013 tentang Transaksi Swap Lindung Nilai kepada Bank Indonesia.  Fourth Amendment to Bank Indonesia Regulation No. 15/17/PBI/2013 on SWAP Hedging Transactions to Bank Indonesia.	Penyesuaian yang dilakukan terhadap kurs acuan dalam transaksi Swap Lindung Nilai kepada Bank Indonesia.  Adjustments made to the reference exchange rate in Swap Hedging transactions with Bank Indonesia.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/4/PBI/2021.  Following the provisions in accordance with Bank Indonesia Regulation No. 23/4/PBI/2021.
27 Mei 2021 27 May 2021	No. 23/5/PBI/2021	Sistem <i>Monitoring</i> Transaksi Valuta Asing terhadap Rupiah.  Monitoring System for Foreign Exchange Transactions against Rupiah.	Bank Indonesia menerapkan Sistem <i>Monitoring</i> Transaksi Valuta Asing terhadap Rupiah untuk memperoleh data dan informasi transaksi valuta asing terhadap Rupiah secara <i>real time</i> .  Bank Indonesia implements a Monitoring System for Foreign Exchange Transactions against Rupiah to obtain real time data and information on foreign exchange transactions against Rupiah.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/5/PBI/2021.  Following the provisions in accordance with Bank Indonesia Regulation No. 23/5/PBI/2021.

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
1 Juli 2021 1 July 2021	No. 23/6/PBI/2021	Penyedia Jasa Sistem Pembayaran. System Service Provider.	Bank Indonesia telah menerbitkan <i>Blueprint</i> Sistem Pembayaran Indonesia 2025 dengan salah satu <i>deliverables</i> yaitu reformasi pengaturan sistem pembayaran yang bertujuan untuk mencari titik keseimbangan antara upaya optimalisasi peluang inovasi digital.  Bank Indonesia has published the Indonesia Payment System Blueprint 2025 with one of the deliverables, namely the reform of payment system regulations which aim to find a balance point among efforts to optimize digital innovation opportunities.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/6/PBI/2021.  Following the provisions in accordance with Bank Indonesia Regulation No. 23/6/PBI/2021.
1 Juli 2021 1 July 2021	No. 23/7/PBI/2021	Penyelenggara Infrastruktur Sistem Pembayaran. Infrastructure Administrator.	Perkembangan digitalisasi dan inovasi dalam bidang sitem pembayaran pada satu sisi memberikan peluang bagi peningkatan efisiensi industri sistem pembayaran dan percepatan ekonomi dan keuangan digital dan semakin tingginya kompleksitas kegiatan dan variasi model bisnis penyelenggaraan sistem pembayaran.  The development of digitalization and innovation in the payment system sector on the one hand provides opportunities for increasing the efficiency of the payment system industry and accelerating the digital economy and finance as well as the increasing complexity of activities and variations in the business model of the payment system operation.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/7/PBI/2021.  Following the provisions in accordance with Bank Indonesia Regulation No. 23/7/PBI/2021
1 Juli 2021 1 July 2021	No. 23/8/PBI/2021	Perubahan Kedua atas Peraturan Bank Indonesia No. 21/9/PBI/2019 tentang Laporan Bank Umum Terintegrasi.  Second Amendment to Bank Indonesia Regulation No. 21/9/PBI/2019 on Integrated Commercial Bank Report.	Dampak pandemi Covid-19 pada kegiatan operasional Bank, termasuk persiapan penyampaian Laporan Bank Umum Terintegrasi (LBUT) belum optimal, oleh karena itu, Bank Indonesia memadamng perlu untuk menyesuaikan waktu implementasi sistem LBUT.  The impact of the Covid-19 pandemic on the Bank's operational activities, including on the preparation for submission of Integrated Commercial Bank Report (LBUT), has not been optimal, and therefore, Bank Indonesia sees the need to adjust the timing of the LBUT system implementation.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/8/PBI/2021.  Following the provisions in accordance with Bank Indonesia Regulation No. 23/8/PBI/2021.
19 Juli 2021 19 July 2021	No. 23/9/PBI/2021	Perubahan atas Peraturan Bank Indonesia No. 22/12/PBI/2020 tentang Penyelesaian Transaksi Bilateral Menggunakan Mata Uang Lokal melalui Bank.  Amendment to Bank Indonesia Regulation No. 22/12/PBI/2020 on Settlement of Bilateral Transactions Using Local Currency Through Banks.	Bank Appointed Cross Currency Dealer Indonesia dilarang melakukan transaksi <i>Domestic Non Deliverable Forward</i> di negara mitra dalam mata uang Rupiah terhadap mata uang negara mitra, kecuali untuk kerangka kerja sama <i>local currency settlement</i> tertentu.  Indonesian Bank Appointed Cross Currency Dealers are prohibited from conducting Domestic Non Deliverable Forward transactions in partner countries in Rupiah against the partner countries' currencies, except for certain local currency settlement cooperation frameworks.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/9/PBI/2021.  Following the provisions in accordance with Bank Indonesia Regulation No. 23/9/PBI/2021.

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
30 Juli 2021 30 July 2021	No. 23/10/PBI/2021	Pasar Uang. Money Market.	<p>Pengembangan Pasar Uang Bank Indonesia mengatur secara menyeluruh (<i>end to end</i>), meliputi pengembangan produk, pelaku pasar (<i>participants</i>), harga (<i>pricing</i>), dan infrastruktur pasar keuangan yang variatif, sehingga pasar uang menjadi tertata dan berfungsi secara baik (<i>well functioning money market</i>).</p> <p>Bank Indonesia Money Market Development regulates as a whole (<i>end to end</i>), including product development, market players (<i>participants</i>), prices (<i>pricing</i>), and various financial market infrastructure, so that the money market becomes organized and functions well (<i>well-functioning money market</i>).</p>	<p>Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/10/PBI/2021.</p> <p>Following the provisions in accordance with Bank Indonesia Regulation No. 23/10/PBI/2021.</p>
13 Agustus 2021 13 August 2021	No. 23/11/PBI/2021	Standar Nasional Pembayaran. Payment System National Standard.	<p>Sistem Nasional</p> <p>Dalam rangka meningkatkan efektivitas pengaturan dan pengawasan sistem pembayaran pada era digital dan standarisasi dalam penyelenggaraan sistem pembayaran bertujuan untuk menciptakan industri sistem pembayaran yang sehat, kompetitif, dan inovatif.</p> <p>In order to increase the effectiveness of regulation and supervision of payment systems in the digital era and standardization in administering payment systems for the purpose of creating a sound, competitive, and innovative payment system industry.</p>	<p>Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/11/PBI/2021.</p> <p>Following the provisions in accordance with Bank Indonesia Regulation No. 23/11/PBI/2021.</p>
30 Agustus 2021 30 August 2021	No. 23/12/PBI/2021	Pencabutan dan Penarikan Uang Rupiah Khusus Tahun Emisi 1970 sampai dengan Tahun Emisi 1990 dari Peredaran. Revocation and Withdrawal of Special Rupiah Money Issued from 1970 to 1990 from Circulation.	Tidak ada dampak bagi Bank Victoria. No impact on Bank Victoria.	<p>Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/12/PBI/2021</p> <p>Following the provisions in accordance with Bank Indonesia Regulation No. 23/12/PBI/2021.</p>

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
31 Agustus 2021 31 August 2021	No. 23/13/PBI/2021	Rasio Pembiayaan Inklusif Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah. Macroprudential Inclusive Financing Ratio for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units.	Untuk mendorong fungsi intermediasi yang seimbang dan berkualitas, perlu peningkatan akses pembiayaan inklusif dan pengembangan bagi Usaha Mikro, Kecil, dan Menengah (UMKM) dan Perorangan Berpenghasilan Rendah (PBR), melalui pengaturan rasio pembiayaan inklusif makroprudensial. Pengaturan rasio pembiayaan inklusif makroprudensial perlu memperluas cakupan pembiayaan kredit atau pembiayaan UMKM dengan memperhatikan keahlian dan model bisnis bank.  To encourage a balanced and quality intermediation function, it is necessary to increase access to inclusive financing and development for Micro, Small, and Medium Enterprises (MSMEs) and Low-Income Individuals (HBWs), through setting the macroprudential inclusive financing ratio. Setting the macroprudential inclusive financing ratio needs to expand the scope of loan financing or MSME financing by considering the expertise and business model of the bank.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/13/PBI/2021.  Following the provisions in accordance with Bank Indonesia Regulation No. 23/13/PBI/2021.
7 September 2021	No. 23/14/PBI/2021	Perubahan Kelima atas Peraturan Bank Indonesia No. 17/18/PBI/2015 tentang Penyelenggaraan Transaksi, Penatausahaan Surat Berharga, dan Setelmen Dana Seketika. Fifth Amendment to Bank Indonesia Regulation No. 17/18/PBI/2015 on Administering Transactions, Administration of Securities, and Instant Fund Settlement.	Terkait penguatan infrastruktur pasar uang dan pengembangan pasar keuangan. Untuk mendukung penguatan infrastruktur pasar uang yang dilakukan dengan membangun interkoneksi antara infrastruktur kliring surat berharga negara dengan infrastruktur setelmen surat berharga negara guna memperkuat infrastruktur pasar uang yang andal, efisien, aman, dan terintegrasi.  Related to strengthening money market infrastructure and developing financial markets. To support the strengthening of money market infrastructure by building interconnections between the state securities clearing infrastructure and the state securities settlement infrastructure in order to strengthen a reliable, efficient, secure, and integrated money market infrastructure.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/14/PBI/2021.  Following the provisions in accordance with Bank Indonesia Regulation No. 23/14/PBI/2021.
10 September 2021	No. 23/15/PBI/2021	Layanan Kebanksentralan. Central Banking Service.	Untuk meningkatkan efektivitas, efisiensi, dan penguatan infrastruktur layanan secara elektronik dengan dukungan Aplikasi Layanan Bank Indonesia, serta meningkatkan kualitas layanan kebanksentralan, akurasi informasi, dan keamanan data yang dapat mendukung pengambilan kebijakan oleh Bank Indonesia.  To improve the effectiveness, efficiency, and strengthening of service infrastructure electronically with the support of Bank Indonesia Service Application, and to improve the quality of central banking services, information accuracy, and data security that can support policy making by Bank Indonesia.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/15/PBI/2021.  Following the provisions in accordance with Bank Indonesia Regulation No. 23/15/PBI/2021.

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
21 Desember 2021 21 December 2021	No. 23/16/PBI/2021	Perubahan Ketiga atas Peraturan Bank Indonesia No. 20/3/PBI/2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah. Third Amendment to Bank Indonesia Regulation No. 20/3/PBI/2018 on Minimum Statutory Reserves in Rupiah and Foreign Currency for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units.	Langkah pengembangan infrastruktur sistem pembayaran ritel nasional dari Bank Indonesia diselaraskan dengan kebijakan Bank Indonesia dalam menjaga stabilitas moneter dan sistem keuangan salah satunya melalui kebijakan giro wajib minimum. Bank Indonesia's steps to develop the national retail payment system infrastructure are aligned with Bank Indonesia's policies to maintain monetary and financial system stability, one of which is the policy of the minimum statutory reserve requirement.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/16/PBI/2021. Following the provisions in accordance with Bank Indonesia Regulation No. 23/17/PBI/2021.
21 Desember 2021 21 December 2021	No. 23/17/PBI/2021	Perubahan Ketiga atas Peraturan Bank Indonesia No. 20/4/PBI/2018 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah. Third Amendment to Bank Indonesia Regulation No. 20/4/PBI/2018 on Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units.	Bank Indonesia mengembangkan infrastruktur sistem pembayaran ritel nasional yang lebih efisien untuk memfasilitasi transfer dana dan setelmen secara langsung dan seketika serta tersedia selama 24 jam sehari dan 7 hari seminggu. Terdapat perubahan cakupan komponen perhitungan yang terkait dengan Giro RIM atau Giro RIM Syariah sehubungan dengan pengembangan infrastruktur sistem pembayaran sebagaimana angka 1 tersebut di atas. Bank Indonesia has developed a more efficient national retail payment system infrastructure to facilitate direct and immediate fund transfers and settlements and is available 24 hours a day and 7 days a week. There is a change in the scope of calculation components related to RIM Current Account or Sharia RIM Current Account in connection with the development of payment system infrastructure as referred to in number 1 above.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/16/PBI/2021. Following the provisions in accordance with Bank Indonesia Regulation No. 23/17/PBI/2021.
28 Desember 2021 28 December 2021	No. 23/18/PBI/2021	Pengendalian Moneter. Monetary Control.	Tujuan untuk mencapai dan memelihara kestabilan nilai Rupiah. Untuk mencapai tujuan tersebut, Bank Indonesia menetapkan dan melaksanakan kebijakan moneter melalui pengendalian moneter, guna membentuk pengaturan yang komprehensif yang meliputi seluruh aspek pengendalian moneter di pasar uang. The objective is to achieve and maintain Rupiah value stability. To achieve this objective, Bank Indonesia establishes and implements monetary policy through monetary control, in order to establish a comprehensive regulation covering all aspects of monetary control in the money market.	Mengikuti ketentuan sesuai dengan Peraturan Bank Indonesia No. 23/18/PBI/2021. Following the provisions in accordance with Bank Indonesia Regulation No. 23/18/PBI/2021.

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
<b>PERATURAN OTORITAS JASA KEUANGAN / FINANCIAL SERVICES AUTHORITY REGULATIONS</b>				
30 Juli 2021 30 July 2021	No. 12/POJK.03/2021	Bank Umum. Commercial Banks.	<p>Penguatan aturan kelembagaan bank badan hukum Indonesia, kantor cabang dari bank yang berkedudukan di luar negeri, dan kantor perwakilan dari bank yang berkedudukan di luar negeri mulai dari hal yang terkait dengan aspek pendirian, operasional, sampai dengan pengakhiran usaha, diperlukan agar mampu menjalankan fungsi secara optimal dan responsif, serta mampu bertindak adaptif terhadap perkembangan teknologi informasi yang pesat.</p> <p>Strengthening the institutional regulations of Indonesian legal entities of banks, branch offices of banks domiciled abroad, and representative offices of banks domiciled abroad, ranging from matters related to aspects of incorporation, operations, to business termination, is required in order to be able to carry out functions in an optimal and responsive manner, and be able to act adaptively to the rapid information technology development.</p>	<p>Mengikuti sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021.</p> <p>Following the provisions of Financial Services Authority Regulation No. 12/POJK.03/2021.</p>
30 Juli 2021 30 July 2021	No. 13/POJK.03/2021	Penyelenggaraan Produk Bank Umum. Administration of Products of Commercial Banks.	<p>Bank harus melakukan peningkatan kualitas pelayanan secara berkelanjutan dengan melakukan transformasi layanan. Hal tersebut diperlukan mengingat tingginya variasi kebutuhan masyarakat sehingga Bank dituntut untuk dapat merespon kebutuhan dengan cepat, agar layanan Bank menjadi tepat sasaran. Untuk mewujudkan hal tersebut transformasi Bank perlu diikuti dengan adanya perubahan model bisnis Bank dalam menghasilkan inovasi produk Bank.</p> <p>Banks must improve service quality on an ongoing basis by transforming services. This is necessary considering the high variation in community needs that requires the Bank to respond quickly to such needs, and so that the Bank's services are right on target. To achieve this, the Bank's transformation needs to be followed by changes in the Bank's business model in producing innovations in Banking products.</p>	<p>Mengikuti sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 13/POJK.03/2021.</p> <p>Following the provisions of Financial Services Authority Regulation No. 13/POJK.03/2021.</p>
30 Juli 2021 30 July 2021	No. 14/POJK.03/2021	Perubahan atas Peraturan Otoritas Jasa Keuangan No. 34/POJK.03/2018 tentang Penilaian Kembali bagi Pihak Utama Lembaga Jasa Keuangan. Amendment to Financial Services Authority Regulation No. 34/POJK.03/2018 on Reassessment for Main Entity of Financial Services Institutions.	<p>Penilaian kembali terhadap Pihak Utama Lembaga Jasa Keuangan (LJK) dilakukan dalam hal terdapat indikasi keterlibatan dan/atau bertanggung jawab terhadap permasalahan integritas, kelayakan keuangan, reputasi keuangan, dan/atau kompetensi yang terjadi pada LJK, sehingga LJK senantiasa dimiliki dan dikelola oleh pihak yang memenuhi persyaratan kemampuan dan kepatutan.</p> <p>Reassessment of Main Party of Financial Services Institutions (LJK) is carried out in the event that there are indications of involvement and/or responsibility for issues of integrity, financial feasibility, financial reputation, and/or competence that occur in the LJK, so that the LJK is always owned and managed by the party that fulfills the fit and proper requirements.</p>	<p>Mengikuti sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 14/POJK.03/2021.</p> <p>Following the provisions of Financial Services Authority Regulation No. 14/POJK.03/2021.</p>

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
10 September 2021	No. 17/POJK.03/2021	<p>Perubahan Kedua atas Peraturan Otoritas Jasa Keuangan tentang Stimulus Perekonomian Nasional sebagai Kebijakan <i>Countercyclical</i> Dampak Penyebaran <i>Corona Virus Disease 2019</i>.</p> <p>Second Amendment to Financial Services Authority Regulation on National Economic Stimulus as a Countercyclical Policy against Impact of the Corona Virus Disease 2019 Spread.</p>	<p>Penyesuaian terhadap Peraturan Otoritas Jasa Keuangan mengenai stimulus perekonomian nasional sebagai kebijakan <i>countercyclical</i> dampak penyebaran Covid-19 yaitu berupa perpanjangan masa berlaku atas kebijakan yang mendukung stimulus pertumbuhan ekonomi terhadap debitur dan kebijakan yang mendukung stimulus pertumbuhan ekonomi terhadap Bank Umum Konvensional, Bank Umum Syariah, atau Unit Usaha Syariah berupa relaksasi penyediaan dana pendidikan dan penetapan kualitas agunan yang diambil alih.</p> <p>Adjustment to the Financial Services Authority Regulation on the national economic stimulus as a countercyclical policy from the impact of the Covid-19 spread, namely in the form of extending the validity period of policies that support the economic growth stimulus to debtors and policies that support economic growth stimulus to Conventional Commercial Banks, Sharia Commercial Banks, or Sharia Business Units is in the form of relaxation of the provision of education funds and determining the quality of foreclosed assets.</p>	<p>Mengikuti sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17/POJK.03/2021.</p> <p>Following the provisions of Financial Services Authority Regulation No. 17/POJK.03/2021.</p>

#### SURAT EDARAN OTORITAS JASA KEUANGAN / FINANCIAL SERVICES AUTHORITY CIRCULARS

15 Januari 2021 15 January 2021	No. 03/SEOJK.03/2021	<p>Pelaporan dan Permintaan Informasi Debitur melalui Sistem Layanan Informasi Keuangan.</p> <p>Reporting and Requesting Debtor Information through Financial Information Service System.</p>	<p>Sehubungan dengan ditetapkannya Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2017 tentang Pelaporan dan Permintaan Informasi Debitur melalui Sistem Layanan Informasi Keuangan yang selanjutnya disingkat POJK PPID SLIK, sebagaimana telah diubah dengan Peraturan Otoritas Jasa Keuangan No. 64/POJK.03/2020 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2017 tentang Pelaporan dan Permintaan Informasi Debitur melalui Sistem Layanan Informasi Keuangan, yang selanjutnya disingkat POJK Perubahan POJK PPID SLIK, perlu untuk mengatur pelaksanaan atas Peraturan Otoritas Jasa Keuangan dimaksud dalam Surat Edaran Otoritas Jasa Keuangan.</p> <p>In connection with the enforcement of Financial Services Authority Regulation No. 18/POJK.03/2017 on Reports and Requests for Debtor Information through the Financial Information Service System, hereinafter abbreviated as POJK PPID SLIK, as amended by Financial Services Authority Regulation No. 64/POJK.03/2020 on Amendments to Financial Services Authority Regulation No. 18/POJK.03/2017 on Reports and Requests for Debtor Information through the Financial Information Service System, hereinafter abbreviated as POJK Amendments to POJK PPID SLIK, is necessary to regulate the implementation of Financial Services Authority Regulations referred to in the Financial Services Authority Circular.</p>	<p>Mengikuti sesuai ketentuan Surat Edaran Otoritas Jasa Keuangan No. 03/POJK.03/2021.</p> <p>Following the provisions of Financial Services Authority Circular No. 03/SEOJK.03/2021.</p>
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Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
31 Maret 2021 31 March 2021	No. 12/SEOJK.03/2021	Rencana Bisnis Bank Umum. Commercial Bank's Business Plan.	Sehubungan dengan berlakunya Peraturan Otoritas Jasa Keuangan No. 5/POJK.03/2016 tentang Rencana Bisnis Bank, yang selanjutnya disebut POJK RBB, Bank diwajibkan untuk menyusun Rencana Bisnis secara realistis setiap tahun.  In connection with the enforcement of Financial Services Authority Regulation No. 5/POJK.03/2016 on Bank Business Plans, hereinafter referred to as POJK RBB, Banks are required to prepare a realistic Business Plan every year.	Mengikuti sesuai ketentuan Surat Edaran Otoritas Jasa Keuangan No. 12/POJK.03/2021.  Following the provisions of Financial Services Authority Circular No. 12/SEOJK.03/2021.
7 Oktober 2021 7 October 2021	No. 24/SEOJK.03/2021	Perhitungan Aset Tertimbang menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar bagi Bank Umum.  Calculation of Risk Weighted Assets for Credit Risk by using Standardized Approach for Commercial Banks.	Dengan adanya standar internasional baru dalam dokumen <i>Basel III: Finalising Post-Crisis Reforms</i> yang mengubah tata cara perhitungan ATMR Risiko Kredit yang sebelumnya diatur dalam Surat Edaran Otoritas Jasa Keuangan No. 42/SEOJK.03/2016 tentang Pedoman Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar sebagaimana telah diubah dengan Surat Edaran Otoritas Jasa Keuangan No. 11/SEOJK.03/2018 tentang Perubahan atas Surat Edaran Otoritas Jasa Keuangan No. 42/SEOJK.03/2016 tentang Pedoman Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar, perlu untuk mengatur ketentuan pelaksanaan mengenai Perhitungan ATMR untuk Risiko Kredit dengan Menggunakan Pendekatan Standar dalam Surat Edaran Otoritas Jasa Keuangan.  With the new international standards in Basel III document: <i>Finalizing Post-Crisis Reforms</i> , which changes the procedures for calculating RWA for Credit Risk, which was previously regulated in Financial Services Authority Circular No. 42/SEOJK.03/2016 on Guidelines for Calculation of Risk-Weighted Assets for Credit Risk Using the Standardized Approach as amended by the Financial Services Authority Circular No. 11/SEOJK.03/2018 on Amendments to Financial Services Authority Circular No. 42/SEOJK.03/2016 on Guidelines for Calculation of Risk-Weighted Assets for Credit Risk Using the Standardized Approach, it is necessary to regulate the provisions to implement RWA Calculation for Credit Risk using the Standardized Approach in the Financial Services Authority Circular.	Mengikuti sesuai ketentuan Surat Edaran Otoritas Jasa Keuangan No. 24/POJK.03/2021.  Following the provisions of Financial Services Authority Circular No. 24/SEOJK.03/2021.

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
27 Desember 2021 27 December 2021	No. 32/SEOJK.03/2021	Perubahan atas Surat Edaran Otoritas Jasa Keuangan No. 9/SEOJK.03/2019 tentang Penilaian Kembali bagi Pihak Utama Bank.  Amendments to Financial Services Authority Circular No. 9/SEOJK.03/2019 on Reassessment for the Bank's Main Party.	Sehubungan dengan ditetapkannya Peraturan Otoritas Jasa Keuangan No. 14/POJK.03/2021 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan No. 34/POJK.03/2018 tentang Penilaian Kembali bagi Pihak Utama Lembaga Jasa Keuangan, yang selanjutnya disebut POJK Perubahan POJK Penilaian Kembali, serta dalam rangka memberikan penjelasan lebih lanjut mengenai penambahan ketentuan dalam cakupan, tata cara dan konsekuensi hasil akhir penilaian kembali, perlu untuk melakukan beberapa perubahan dalam Surat Edaran Otoritas Jasa Keuangan No. 9/SEOJK.03/2019 tentang Penilaian Kembali bagi Pihak Utama Bank.  In connection with the enforcement of Financial Services Authority Regulation No. 14/POJK.03/2021 on Amendments to Financial Services Authority Regulation No. 34/POJK.03/2018 on Reassessment for Main Party of Financial Services Institutions, hereinafter referred to as POJK Amendments to POJK Reassessment, and in order to provide further explanation regarding the addition of provisions in the scope, procedures, and consequences of the final reassessment result, it is necessary to made several changes in the Financial Services Authority Circular No. 9/SEOJK.03/2019 on Reassessment for the Bank's Main Party.	Mengikuti sesuai ketentuan Surat Edaran Otoritas Jasa Keuangan No. 32/POJK.03/2021.  Following the provisions of Financial Services Authority Circular No. 32/SEOJK.03/2021.
31 Desember 2021 31 December 2021	No. 34/SEOJK.03/2021	Buku Panduan Akuntansi Perbankan bagi Bank Umum Konvensional.  Banking Accounting Handbook for Conventional Commercial Banks.	Bank dituntut untuk menyusun laporan keuangan sesuai dengan standar akuntansi keuangan yang berbasis <i>International Financial Reporting Standards</i> (IFRS). Standar tersebut bersifat prinsip ( <i>principlebased</i> ), sehingga dibutuhkan panduan akuntansi atas transaksi perbankan.  Banks are required to prepare financial statements in accordance with the financial accounting standards based on the International Financial Reporting Standards (IFRS). These standards are principle-based, and therefore, accounting guidelines for banking transactions are needed.	Mengikuti sesuai ketentuan Surat Edaran Otoritas Jasa Keuangan No. 34/POJK.03/2021.  Following the provisions of Financial Services Authority Circular No. 34/SEOJK.03/2021.
<b>PERATURAN ANGGOTA DEWAN GUBERNUR / REGULATIONS OF MEMBERS OF BOARD OF GOVERNORS</b>				
8 Januari 2021 8 January 2021	No. 23/1/PADG/2021	Pelaksanaan Lelang Berharga Negara di Pasar Perdana.  Administering State Valuable Auction in Primary Market.	Tidak ada dampak terhadap Bank Victoria.  No impact on Bank Victoria.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/1/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/1/PADG/2021.
27 Januari 2021 27 January 2021	No. 23/2/PADG/2021	Perubahan atas Peraturan Anggota Dewan Gubernur No. 21/26/PADG/2019 tentang Devisa Hasil Ekspor dan Devisa Pembayaran Impor.  Amendment to Regulation of Members of Board of Governors No. 21/26/PADG/2019 on Foreign Exchange from Export Results and Foreign Exchange from Import Payments.	Tidak ada dampak terhadap Bank Victoria.  No impact on Bank Victoria.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/2/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/2/PADG/2021.

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
2 Maret 2021 2 March 2021	No. 23/3/PADG/2021	Peraturan Anggota Dewan Gubernur No. 23/3/PADG/2021 tentang Perubahan atas Peraturan Anggota Dewan Gubernur No. 22/3/PADG/2020 tentang Pelaksanaan Standardisasi Kompetensi di Bidang Sistem Pembayaran dan Pengelolaan Uang Rupiah.  Regulation of Members of Board of Governors No. 23/3/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 22/3/PADG/2020 on Standardization of Competencies in the Field of Payment System and Rupiah Money Management.	Tidak ada dampak terhadap Bank Victoria.  No impact on Bank Victoria.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/3/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/3/PADG/2021.
31 Maret 2021 31 March 2021	No. 23/4/PADG/2021	Peraturan Anggota Dewan Gubernur No. 23/4/PADG/2021 tentang Perubahan atas Peraturan Anggota Dewan Gubernur No. 20/18/PADG/2018 tentang Transaksi Swap Lindung Nilai kepada Bank Indonesia.  Regulation of Members of Board of Governors No. 23/4/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 20/18/PADG/2018 on SWAP Hedging Transactions to Bank Indonesia.	Dalam upaya mendukung pendalaman pasar valuta asing domestik, Bank Indonesia menyediakan instrumen berupa Transaksi Swap Lindung Nilai kepada Bank Indonesia bagi pelaku pasar domestik yang diharapkan dapat membantu pengelolaan likuiditas dan mendukung pencapaian tujuan Bank Indonesia yaitu mencapai dan memelihara kestabilan nilai Rupiah. Untuk meningkatkan efektivitas pelaksanaan, Bank Indonesia melakukan penyesuaian penggunaan kurs acuan dalam Transaksi Swap Lindung Nilai kepada Bank Indonesia seiring dengan upaya penguatan kurs <i>Jakarta Interbank Spot Dollar Rate (JISDOR)</i> .  In an effort to support the in-depth of domestic foreign exchange market, Bank Indonesia provides instruments in the form of Hedging Swap Transactions with Bank Indonesia for domestic market players, which are expected to assist liquidity management and support the achievement of Bank Indonesia's objectives of achieving and maintaining Rupiah value stability. To improve implementation effectiveness, Bank Indonesia adjusted the use of reference exchange rate in Hedging Swap Transactions with Bank Indonesia in line with the efforts to strengthen Jakarta Interbank Spot Dollar Rate (JISDOR) exchange rate.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/4/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/4/PADG/2021.
31 Maret 2021 31 March 2021	No. 23/5/PADG/2021	Peraturan Anggota Dewan Gubernur No. 23/5/PADG/2021 tentang Perubahan atas Peraturan Anggota Dewan Gubernur No. 21/23/PADG/2019 tentang Laporan Bank Umum Terintegrasi.  Regulation of Members of Board of Governors No. 23/5/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 21/23/PADG/2019 on Integrated Commercial Bank Report.	Sehubungan dengan penerbitan Peraturan Bank Indonesia No. 22/22/PBI/2020 tentang Perubahan atas Peraturan Bank Indonesia No. 21/9/PBI/2019 tentang Laporan Bank Umum Terintegrasi, diperlukan penyesuaian pada peraturan pelaksanaan dari Peraturan Bank Indonesia dalam bentuk Peraturan Anggota Dewan Gubernur.  In connection with the issuance of Bank Indonesia Regulation No. 22/22/PBI/2020 on Amendments to Bank Indonesia Regulation No. 21/9/PBI/2019 on Integrated Commercial Bank Reports, adjustments are needed to the implementing regulations of Bank Indonesia Regulations in the form of Regulations for Members of the Board of Governors.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/5/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/5/PADG/2021.

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
5 April 2021	No. 23/6/PADG/2021	<p>Perubahan Kedua atas Peraturan Anggota Dewan Gubernur No. 21/25/PADG/2019 tentang Rasio <i>Loan to Value</i> untuk Kredit Properti, Rasio <i>Financing to Value</i> untuk Pembiayaan Properti, dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor (PADG Perubahan Kedua LTV/FTV dan Uang Muka).</p> <p>Second Amendment to Regulation of Members of Board of Governors No. 21/25/PADG/2019 on Loan to Value Ratio for Property Credit, Financing to Value Ratio for Property Financing, and Down Payment for Motor Vehicles Credit or Financing (Second Amendment to PADG LTV/FTV and Down Payment).</p>	<p>Sehubungan dengan penerbitan Peraturan Bank Indonesia No. 23/2/PBI/2021 tentang Perubahan Ketiga atas Peraturan Bank Indonesia No. 20/8/PBI/2018 tentang Rasio Loan to Value untuk Kredit Properti, Rasio <i>Financing to Value</i> untuk Pembiayaan Properti, dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor, diperlukan peraturan pelaksanaan dari Peraturan Bank Indonesia tersebut yang mengatur hal-hal teknis mengenai mekanisme pelaksanaan ketentuan Rasio <i>Loan to Value</i> untuk Kredit Properti, Rasio <i>Financing to Value</i> untuk Pembiayaan Properti, dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor dalam bentuk Peraturan Anggota Dewan Gubernur.</p> <p>In connection with the issuance of Bank Indonesia Regulation No. 23/2/PBI/2021 on the Third Amendment to Bank Indonesia Regulation No. 20/8/PBI/2018 on Loan to Value Ratio for Property Loans, Financing to Value Ratio for Property Financing, and Down Payment for Motor Vehicle Loans or Financing, an implementing regulation is required of the Bank Indonesia Regulation that regulates technical matters regarding the mechanism implementation of the provisions on Loan to Value Ratio for Property Loans, Financing to Value Ratio for Property Financing, and Down Payment for Motor Vehicle Loans or Financing in the form of a Regulation of Members of the Board of Governors.</p>	<p>Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/6/PADG/2021.</p> <p>Following the provisions of Regulation of Members of Board of Governors No. 23/6/PADG/2021.</p>
26 April 2021	No. 23/7/PADG/2021	<p>Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 21/22/PADG/2019 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah.</p> <p>Third Amendment to Regulation of Members of Board of Governors No. 21/22/PADG/2019 on Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units.</p>	<p>Bank Indonesia melakukan penyesuaian terhadap pengaturan Rasio Intermediasi Makroprudensial melalui penerbitan Peraturan Anggota Dewan Gubernur No. 23/7/PADG/2021 tentang Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 21/22/PADG/2019 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah (Peraturan Anggota Dewan Gubernur Perubahan Ketiga Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial).</p> <p>Bank Indonesia made adjustments to the regulation of Macroprudential Intermediation Ratio through the issuance of Regulation of Members of Board of Governors No. 23/7/PADG/2021 on the Third Amendment to Regulation of Members the Board of Governors No. 21/22/PADG/2019 on Macroprudential Intermediation Ratios and Macroprudential Liquidity Buffers for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units (Regulation of Members of Board of Governors, Third Amendment of Macroprudential Intermediation Ratios and Macroprudential Liquidity Buffers).</p>	<p>Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/7/PADG/2021.</p> <p>Following the provisions of Regulation of Members of Board of Governors No. 23/7/PADG/2021.</p>

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
30 April 2021	No. 23/8/PADG/2021	Peraturan Anggota Dewan Gubernur No. 23/7/PADG/2021 tentang Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 21/18/PADG/2019 tentang Implementasi Standar Nasional <i>Quick Response Code</i> untuk Pembayaran.  Regulation of Members of Board of Governors No. 23/7/PADG/2021 on Third Amendment to Regulation of Members of Board of Governors No. 21/18/PADG/2019 on Implementation of National Standard of Quick Response Code for Payment.	Bank Indonesia telah menetapkan standar nasional QR Code untuk pembayaran (QRIS) yang wajib digunakan dalam setiap transaksi pembayaran yang difasilitasi dengan QR Code Pembayaran.  Bank Indonesia has established the national standard of QR Code for payments (QRIS), which must be used in every payment transaction facilitated by QR Code Payments.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/8/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/8/PADG/2021.
2 Agustus 2021 2 August 2021	No. 23/12/PADG/2021	Penyelesaian Transaksi Bilateral antara Indonesia dan Malaysia Menggunakan Rupiah dan Ringgit melalui Bank.  Settlement of Bilateral Transactions between Indonesia and Malaysia Using Rupiah and Ringgit through Banks.	Tidak ada dampak terhadap Bank Victoria.  No impact on Bank Victoria.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/12/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/12/PADG/2021.
2 Agustus 2021 2 August 2021	No. 23/13/PADG/2021	Perubahan Kedua atas Peraturan Anggota Dewan Gubernur No.21/23/PADG/2019 tentang Laporan Bank Umum Terintegrasi.  Second Amendment to Regulation of Members of Board of Governors No. 21/23/PADG/2019 on Integrated Commercial Bank Report.	Sehubungan dengan penerbitan Peraturan Bank Indonesia No.23/8/PBI/2021 tentang Perubahan Kedua atas Peraturan Bank Indonesia No. 21/9/PBI/2019 tentang Laporan Bank Umum Terintegrasi, diperlukan penyesuaian pada peraturan pelaksanaan dari Peraturan Bank Indonesia dalam bentuk Peraturan Anggota Dewan Gubernur. Penyesuaian pengaturan mengenai waktu implementasi Laporan Bank Umum Terintegrasi.  In connection with the issuance of Bank Indonesia Regulation No. 23/8/PBI/2021 on the Second Amendment to Bank Indonesia Regulation No. 21/9/PBI/2019 on Integrated Commercial Bank Reports, adjustments are needed to the implementing regulations of Bank Indonesia Regulations in the form of Regulations for Members of Board of Governors. Adjustment of settings regarding the implementation time of the Integrated Commercial Bank Report.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/13/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/13/PADG/2021.
5 Agustus 2021 5 August 2021	No. 23/14/PADG/2021	Perubahan atas Peraturan Anggota Dewan Gubernur No. 22/20/PADG/2020 tentang Penyelesaian Transaksi Bilateral antara Indonesia dan Jepang Menggunakan Rupiah dan Yen melalui Bank.  Amendment to Regulation of Members of Board of Governors No. 22/20/PADG/2020 on Settlement of Bilateral Transactions between Indonesia and Japan Using Rupiah and Yen through Banks.	Tidak ada dampak terhadap Bank Victoria.  No impact on Bank Victoria.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/14/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/14/PADG/2021.
20 Agustus 2021 20 August 2021	No. 23/15/PADG/2021	Standar Nasional <i>Open Application Programming Interface</i> Pembayaran.  National Standard of Open Application Programming Interface for Payment.	Kebijakan SNAP sebagai salah satu inisiatif utama <i>Blueprint</i> SP Indonesia 2025 (BSPI 2025).  No impact on Bank Victoria.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/15/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/15/PADG/2021.

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
6 September 2021	No. 23/16/PADG/2021	Penyelesaian Transaksi Bilateral antara Indonesia dan Tiongkok Menggunakan Rupiah dan Yuan melalui Bank.  Settlement of Bilateral Transactions between Indonesia and China Using Rupiah and Yuan through Banks.	Tidak ada dampak terhadap Bank Victoria.  No impact on Bank Victoria.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/16/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/16/PADG/2021.
9 September 2021	No. 23/17/PADG/2021	Tata Cara Pelaksanaan Perlindungan Konsumen Bank Indonesia.  Procedures for Implementation of Bank Indonesia Consumer Protection.	Mengkinikan ketentuan internal terkait Peraturan Anggota Dewan Gubernur tersebut. Untuk mendukung pelaksanaan tugas Bank Indonesia di bidang moneter, makroprudensial, dan sistem pembayaran, Bank Indonesia memiliki kewenangan untuk mengatur dan mengawasi penyelenggara yang produk dan/atau jasanya dimanfaatkan oleh konsumen, termasuk pengaturan untuk aspek perlindungan konsumen. pengaturan perlindungan konsumen yang efektif akan mendorong kenyamanan bagi konsumen dalam melakukan transaksi ekonomi untuk selanjutnya mendukung stabilitas sistem keuangan serta pertumbuhan ekonomi yang berkelanjutan. Bagi Penyelenggara, perlindungan konsumen yang efektif menyediakan kepastian hukum, meningkatkan kepercayaan konsumen, dan berdampak positif untuk keberlangsungan kegiatan usahanya.  Updating the internal provisions related to the Regulation of Members of Board of Governors. To support the implementation of Bank Indonesia's duties in the monetary, macroprudential, and payment systems, Bank Indonesia has the authority to regulate and supervise providers whose products and/or services are utilized by consumers, including regulations for consumer protection aspects. Effective consumer protection arrangements will encourage convenience for consumers in conducting economic transactions to further support financial system stability and sustainable economic growth. For the Administrator, effective consumer protection provides legal certainty, increases consumer confidence, and has a positive impact on the sustainability of its business activities.	Telah dikinikan dengan Surat Keputusan Direksi No. 028/SK-DIR/04/21 tentang Kebijakan Perlindungan Konsumen Bank Indonesia.  Has been updated with the Board of Directors' Decision Letter No. 028/SK-DIR/04/21 on Bank Indonesia's Consumer Protection Policy.
13 September 2021	No. 23/18/PADG/2021	Peraturan Pelaksanaan Layanan Kebanksentralan.  Regulations for Implementation of Central Banking Services.	Untuk meningkatkan efektivitas dan efisiensi pengelolaan nasabah dan layanan kebanksentralan.  To improve the effectiveness and efficiency of customer management and central banking services.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/18/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/18/PADG/2021.

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
13 September 2021	No. 23/19/PADG/2021	Penyelenggaraan Aplikasi Layanan Bank Indonesia. Implementation of Bank Indonesia Service Applications.	<ol style="list-style-type: none"> <li>1. Untuk meningkatkan tata kelola dan kualitas layanan jasa kebanksentralan dan layanan kepesertaan Bank Indonesia kepada nasabah; dan</li> <li>2. Untuk meningkatkan akses nasabah terhadap layanan kebanksentralan melalui Aplikasi Layanan Bank Indonesia.</li> </ol> <ol style="list-style-type: none"> <li>1. To improve the governance and quality of central banking services and Bank Indonesia's membership services to customers; and</li> <li>2. To improve customer access to central banking services through Bank Indonesia Service Application.</li> </ol>	<p>Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/19/PADG/2021.</p> <p>Following the provisions of Regulation of Members of Board of Governors No. 23/19/PADG/2021.</p>
13 September 2021	No. 23/20/PADG/2021	Layanan Sub-Registry Bank Indonesia. Bank Indonesia Sub-Registry Services.	Tidak ada dampak terhadap Bank Victoria. No impact on Bank Victoria.	<p>Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/20/PADG/2021.</p> <p>Following the provisions of Regulation of Members of Board of Governors No. 23/20/PADG/2021.</p>
13 September 2021	No. 23/21/PADG/2021	Transaksi <i>Letter of Credit</i> di Bank Indonesia. Letter of Credit Transactions at Bank Indonesia.	Tidak ada dampak terhadap Bank Victoria. No impact on Bank Victoria. No impact on Bank Victoria.	<p>Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/21/PADG/2021.</p> <p>Following the provisions of Regulation of Members of Board of Governors No. 23/21/PADG/2021.</p>
13 September 2021	No. 23/22/PADG/2021	Rekening Giro di Bank Indonesia. Demand Deposits at Bank Indonesia.	Tidak ada dampak terhadap Bank Victoria. No impact on Bank Victoria.	<p>Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/22/PADG/2021.</p> <p>Following the provisions of Regulation of Members of Board of Governors No. 23/22/PADG/2021.</p>
13 September 2021	No. 23/23/PADG/2021	Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 20/4/PADG/2018 tentang Penyelenggaraan Penatausahaan Surat Berharga melalui Bank Indonesia- <i>Scripless Securities Settlement System</i> . Third Amendment to Regulation of Members of Board of Governors No. 20/4/PADG/2018 on Administration of Securities through Bank Indonesia, Scripless Securities Settlement System.	<p>Kebijakan Bank Indonesia dalam penguatan infrastruktur pasar uang yang andal, efisien, aman, dan terintegrasi yang tertuang di dalam <i>blueprint</i> pengembangan pasar uang 2025. Kebijakan tersebut perlu didukung dengan membangun interkoneksi antara infrastruktur kliring dengan infrastruktur <i>Setelmen</i> Surat Berharga. Oleh karena itu, perlu mengakomodasi lembaga kliring dan penjaminan dalam kepesertaan di Bank Indonesia-<i>Scripless Securities Settlement System</i>.</p> <p>Bank Indonesia's policies to strengthen reliable, efficient, secure, and integrated money market infrastructure are contained in the money market development blueprint 2025. These policies need to be supported by building interconnections between clearing infrastructure and Securities Settlement infrastructure. Therefore, it is necessary to accommodate clearing and guarantee institutions in participating in the Bank Indonesia-Scripless Securities Settlement System.</p>	<p>Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/23/PADG/2021.</p> <p>Following the provisions of Regulation of Members of Board of Governors No. 23/23/PADG/2021.</p>



Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
7 Oktober 2021 7 October 2021	No. 23/24/PADG/2021	<p>Kepesertaan dalam Penyelenggaraan Transfer Dana, Kliring Berjadwal, Transaksi, Penatausahaan Surat Berharga, dan Setelmen Dana Seketika.</p> <p>Participation in Organizing Fund Transfers, Scheduled Clearing, Transactions, Securities Administration, and Instant Fund Settlement.</p>	<p>kebijakan Bank Indonesia untuk meningkatkan layanan kepesertaan dalam penyelenggaraan infrastruktur sistem pembayaran dan sistem keuangan guna meningkatkan efisiensi, kemudahan, dan transparansi dalam penyelenggaraan transfer dana, kliring berjadwal, transaksi, penatausahaan surat berharga, dan setelmen dana seketika. Kebijakan tersebut perlu didukung dengan mengembangkan sistem pendukung layanan kepesertaan dalam penyelenggaraan infrastruktur sistem pembayaran dan sistem keuangan secara elektronik dan tersentralisasi.</p> <p>Bank Indonesia's policy to improve membership services in the payment system and financial system infrastructure in order to improve efficiency, convenience, and transparency in the operation of fund transfers, scheduled clearing, transactions, administration of securities, and real-time fund settlements. This policy needs to be supported by developing a membership service support system in the implementation of an electronic and centralized payment system infrastructure and financial system.</p>	<p>Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/24/PADG/2021.</p> <p>Following the provisions of Regulation of Members of Board of Governors No. 23/24/PADG/2021.</p>
12 November 2021	No. 23/25/PADG/2021	<p>Peraturan Anggota Dewan Gubernur No. 23/25/PADG/2021 tentang Penyelenggaraan Bank Indonesia-Fast Payment.</p> <p>Regulation of Members of Board of Governors No. 23/25/PADG/2021 on Implementation of Bank Indonesia-Fast Payment.</p>	<p>Penyelenggaraan Bank Indonesia-Fast Payment diselaraskan dengan arah kebijakan Bank Indonesia baik di sektor moneter, makroprudensial, serta sistem pembayaran dan pengelolaan uang rupiah untuk mendukung terciptanya ekosistem digital yang <i>integrated, interoperable, dan interconnected</i></p> <p>The implementation of Bank Indonesia-Fast Payment is aligned with Bank Indonesia's policy directions in the monetary, macroprudential, payment systems, and rupiah currency management to support the creation of an integrated, interoperable, and interconnected digital ecosystem.</p>	<p>Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/25/PADG/2021.</p> <p>Following the provisions of Regulation of Members of Board of Governors No. 23/25/PADG/2021.</p>

Tanggal Date	Nomor Peraturan Regulation Number	Uraian Perubahan Description of Amendments	Dampak terhadap Bank Victoria Impact on Bank Victoria	Penyesuaian yang Dilakukan Adjustment Made
24 November 2021	No. 23/26/PADG/2021	Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 21/25/PADG/2019 tentang Rasio <i>Loan to Value</i> untuk Kredit Properti, Rasio <i>Financing to Value</i> untuk Pembiayaan Properti, dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor (PADG Perubahan Ketiga LTV/FTV dan Uang Muka).  Third Amendment to Regulation of Members of Board of Governors No. 21/25/PADG/2019 on Loan to Value Ratio for Property Credit, Financing to Value Ratio for Property Financing, and Down Payment for Motor Vehicles Credit or Financing (Third Amendment to PADG LTV/FTV and Down Payment).	<ol style="list-style-type: none"> <li>1. Untuk menjaga stabilitas sistem keuangan dan mendukung upaya pertumbuhan ekonomi, Bank Indonesia perlu melanjutkan kebijakan makroprudensial yang bersifat akomodatif; dan</li> <li>2. Kebijakan makroprudensial yang bersifat akomodatif berupa melanjutkan pelonggaran Rasio LTV untuk Kredit Properti (KP), Rasio FTV untuk Pembiayaan Properti (PP), dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor (KKB atau PKB) untuk mendorong pertumbuhan kredit di sektor properti dan sektor otomotif.</li> </ol> <ol style="list-style-type: none"> <li>1. To maintain financial system stability and support efforts for economic growth, Bank Indonesia needs to continue with accommodative macroprudential policies; and</li> <li>2. Accommodative macroprudential policies in the form of continuing to loosen the LTV Ratio for Property Loans (KP), FTV Ratio for Property Financing (PP), and Down Payment for Motor Vehicle Loans or Financing (KKB or PKB) to encourage loan growth in the property sector and automotive sector.</li> </ol>	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/26/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/26/PADG/2021.
21 Desember 2021	No. 23/27/PADG/2021	Perubahan Ketujuh atas Peraturan Anggota Dewan Gubernur No. 20/10/PADG/2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing Bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah.  Seventh Amendment to the Regulation of Members of Board of Governors No. 20/10/PADG/2018 on Minimum Statutory Reserves in Rupiah and Foreign Exchange for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units.	Mengkinikan Ketentuan internal terkait Peraturan Anggota Dewan Gubernur tersebut.  Updating the internal provisions related to the Regulation of Members of Board of Governors.	Surat Keputusan Direksi No. 006/SK-DIR/02/22 tentang Pengelolaan Likuiditas Bank Victoria.  Board of Directors' Decision Letter No. 006/SK-DIR/02/22 on Bank Victoria's Liquidity Management.
28 Desember 2021	No. 23/23/PADG/2021	Perubahan atas Peraturan Anggota Dewan Gubernur No. 21/4/PADG/2019 tentang Pelaporan Kegiatan Lalu Lintas Devisa Berupa Utang Luar Negeri dan Transaksi Partisipasi Risiko.  Amendment to Regulation of Members of Board of Governors No. 21/4/PADG/2019 on Reporting of Foreign Exchange Activities in the Form of Foreign Debt and Risk Participation Transactions.	Tidak ada dampak terhadap Bank Victoria.  No impact on Bank Victoria.	Mengikuti sesuai ketentuan Peraturan Anggota Dewan Gubernur No. 23/28/PADG/2021.  Following the provisions of Regulation of Members of Board of Governors No. 23/28/PADG/2021.

## Perubahan Kebijakan Akuntansi dan Pengaruhnya terhadap Kinerja Bank

### Alasan Perubahan Kebijakan Akuntansi

Perubahan kebijakan akuntansi yang dilakukan di tahun 2021 adalah terkait dengan penerapan standar akuntansi (PSAK) baru. Penerapan standar akuntansi keuangan dilakukan untuk mematuhi PSAK yang berlaku.

## Amendments to Accounting Principles and Their Impact on the Bank's Performance

### Reasons of Amendments to Accounting Principles

Amendments to accounting policies carried out in 2021 are related to the application of new accounting standards (PSAK). The application of financial accounting standards is carried out to comply with the new PSAK.

## Perubahan Kebijakan Akuntansi yang Signifikan

Efektif 1 Januari 2021, Bank Victoria telah menerapkan beberapa standar akuntansi (PSAK) baru, perubahan, dan interpretasi (ISAK) yang relevan dengan operasi Bank yang berlaku efektif sejak tanggal tersebut, sebagai berikut.

## Significant Amendments to Accounting Principles

Effective 1 January 2021, Bank Victoria has implemented a number of new accounting standards (PSAK), amendments, and interpretations (ISAK) relevant to the Bank's operations that are effective from the said date, as follows.

ISAK/Amandemen PSAK Amendment to ISAK/PSAK	Dampak terhadap Bank Impact on the Bank
Amandemen PSAK 71 "Instrumen Keuangan: tentang Fitur Percepatan Pelunasan dengan Kompensasi Negatif" Amendment to PSAK 71, "Financial Instruments: Prepayment Features with Negative Compensation"	Tidak berdampak signifikan terhadap Laporan Keuangan Konsolidasian Bank. No significant impacts on the Bank's Consolidated Financial Statements.
Amandemen PSAK 73 "Sewa" tentang Konsesi Sewa Terkait Covid-19 Amendment to PSAK 73, "Leases" related to Covid-19 Rent Concessions	Tidak berdampak signifikan terhadap Laporan Keuangan Konsolidasian Bank. No significant impacts on the Bank's Consolidated Financial Statements.
Amandemen PSAK 102 "Akuntansi Murabahah" Amendment PSAK 102 "Accounting for Murabahah"	Tidak berdampak signifikan terhadap Laporan Keuangan Konsolidasian Bank. No significant impacts on the Bank's Consolidated Financial Statements.
Penyesuaian tahunan 2019 terhadap PSAK 1 "Penyajian Laporan Keuangan" Annual Improvements 2019 to PSAK 1 "Presentation of Financial Statements"	Tidak berdampak signifikan terhadap Laporan Keuangan Konsolidasian Bank. No significant impacts on the Bank's Consolidated Financial Statements.
ISAK 35 "Penyajian Laporan Keuangan Entitas Berorientasi Nirlaba" ISAK 35 "Presentation of Non-Profit Oriented Entities Financial Statements"	Tidak berdampak signifikan terhadap Laporan Keuangan Konsolidasian Bank. No significant impacts on the Bank's Consolidated Financial Statements.
ISAK 101 "Pengakuan Pendapatan Murabahah Tanggung tanpa Risiko Signifikan terkait Kepemilikan Persediaan" ISAK 101 "Recognition of Deferred Murabahah Income without Significant Inventory Ownership Risks"	Tidak berdampak signifikan terhadap Laporan Keuangan Konsolidasian Bank. No significant impacts on the Bank's Consolidated Financial Statements.
ISAK 102 "Penurunan Nilai Piutang Murabahah" ISAK 102 "Impairment of Murabahah Receivables"	Tidak berdampak signifikan terhadap Laporan Keuangan Konsolidasian Bank. No significant impacts on the Bank's Consolidated Financial Statements.
PPSAK 13 Pencabutan PSAK 45 Laporan Keuangan Entitas Nirlaba PPSAK 13 Revocation of PSAK 45 Financial Reporting for Non-Profit Organizations	Tidak berdampak signifikan terhadap Laporan Keuangan Konsolidasian Bank. No significant impacts on the Bank's Consolidated Financial Statements.
Amandemen Kerangka Konseptual Pelaporan Keuangan Amendment to Conceptual Framework for Financial Reporting.	Tidak berdampak signifikan terhadap Laporan Keuangan Konsolidasian Bank. No significant impacts on the Bank's Consolidated Financial Statements.

## Informasi Kelangsungan Usaha

### Hal-hal yang Berpotensi Berpengaruh Signifikan terhadap Kelangsungan Usaha Bank

Pada tahun 2021, tidak terdapat hal-hal yang berpotensi berpengaruh signifikan terhadap kelangsungan usaha Perseroan.

### Assessment Manajemen Atas Hal-hal yang Berpengaruh Signifikan terhadap Kelangsungan Usaha Bank

Manajemen Bank telah melakukan penilaian atas kemampuan Bank untuk melanjutkan kelangsungan usahanya dan berkeyakinan bahwa Bank memiliki sumber daya untuk melanjutkan usahanya di masa mendatang. Selain itu, manajemen tidak mengetahui adanya ketidakpastian material yang dapat menimbulkan keraguan yang signifikan terhadap kemampuan Bank untuk mempertahankan kelangsungan hidupnya. Oleh karena itu, laporan keuangan konsolidasian telah disusun atas dasar usaha yang berkelanjutan.

## Information on Business Continuity

### Matters with Potential Significant Impact on the Bank's Business Continuity

In 2021, there were no matters with potential significant impact on the Company's business continuity.

### Management Assessment on Matters with Significant Impact on the Bank's Business Continuity

The Bank's management has assessed the Bank's ability to continue its business continuity and believes that the Bank has the resources to continue its business in the future. Moreover, the management does not see any material uncertainty that can cause significant doubts on the Bank's ability to maintain its business continuity. Therefore, the consolidated financial statements have been prepared based on the sustainable business.

### Asumsi yang Digunakan Manajemen dalam Melakukan Assessment

Faktor-faktor yang menjadi pertimbangan bagi Manajemen dalam melakukan penilaian kelangsungan usaha Bank adalah:

1. Pertumbuhan ekonomi global, ekonomi nasional dan industri perbankan;
2. Kinerja keuangan Bank;
3. Solvabilitas dengan rasio kecukupan modal Bank; serta
4. Masalah internal dan perkara hukum yang dihadapi.

### Kinerja Entitas Anak

Bank Victoria Syariah menjalankan segmen bisnis syariah sebagai Entitas Anak dari Bank Victoria. Profil singkat Bank Victoria Syariah terdapat di bab Profil Perusahaan. Berikut penjelasan singkat mengenai kinerja keuangan Bank Victoria Syariah di tahun 2021.

#### Kinerja Keuangan Utama Bank Victoria Syariah Bank Victoria Syariah's Main Financial Performance

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2021	2020	Pertumbuhan Performance		Description
			Rp	%	
Aset	1,660,849	2,296,027	(635,178)	(27.66)	Assets
Liabilitas	69,395	537,287	(467,892)	(87.08)	Liabilities
Dana Syirkah Temporer	1,230,492	1,379,182	(148,690)	(10.80)	Temporary Syirkah Fund
Ekuitas	360,962	379,557	(18,595)	(4.90)	Equity
Piutang dan Pembiayaan	754,702	1,139,142	(384,440)	(33.75)	Financing and Receivables
Pendapatan Pengelolaan Dana oleh Bank Sebagai Mudharib	113,818	148,750	(39,932)	(26.85)	Revenue from Fund Management by the Bank as Mudharib
Hak Bagi Hasil Milik Bank	45,454	36,506	8,948	24.51	Profit Sharing Rights of the Bank
Beban Operasional Lainnya	61,088	48,860	12,228	25.03	Other Operating Expenses
Laba Operasional	12,254	3,616	8,638	238.88	Operating Income
Laba (Rugi) Tahun Berjalan	4,520	(215)	4,735	2,202.33	Profit (Loss) for the Year
Laba Komprehensif selama Tahun Berjalan	(18,595)	25,313	(43,908)	(173.46)	Comprehensive Profit for the Year

#### Rasio Keuangan Utama Bank Victoria Syariah Bank Victoria Syariah's Main Financial Ratio

(dalam % / in %)

Uraian	2021	2020	Description
Rasio Kecukupan Modal (CAR)	33.21	24.69	Capital Adequacy Ratio (CAR)
Rasio Pembiayaan terhadap Dana Pihak Ketiga	65.26	74.05	Loan to Deposit Ratio
Imbal Hasil Rata-Rata Aset	0.71	0.16	Return on Asset
Imbal Hasil Rata-Rata Ekuitas	1.79	1.51	Return on Equity
Pendapatan Bunga Bersih	2.68	1.92	Net Interest Income
Non-Performing Loans (NPF) - net	3.72	3.01	Non-Performing Loans (NPF) - net

### Assumptions Used by the Management in Conducting Assessment

Factors that become the considerations for the Management in conducting assessment of the Bank's business continuity are:

1. Global, national, and banking industry economic growth;
2. Bank's financial performance;
3. Solvency with the Bank's capital adequacy ratio; and
4. Internal problems and legal cases faced.

### Subsidiary Performance

Bank Victoria Syariah runs a sharia business segment as a subsidiary of Bank Victoria. A brief profile of Bank Victoria Syariah is found in the Company Profile chapter. Below is a brief explanation of Bank Victoria Syariah's financial performance in 2021.

Pada tahun 2021, Bank Victoria Syariah mencatatkan penurunan total aset sebesar 27,66% atau Rp635,178 miliar menjadi Rp1,66 triliun. Selain itu, liabilitas Bank Victoria Syariah juga mengalami penurunan 87,08% menjadi Rp69,40 miliar. Sedangkan dana *syirkah* temporer tercatat Rp1,23 triliun, mengalami penurunan 10,78% dari sebelumnya Rp1,38 triliun. Selain itu, total ekuitas Bank Victoria Syariah turut mengalami penurunan sebesar 4,90% menjadi Rp360,96 miliar dari sebelumnya Rp379,56 miliar.

Piutang dan pembiayaan, serta pendapatan pengelolaan dana oleh Bank sebagai Mudharib, mengalami penurunan masing-masing sebesar Rp384,44 miliar dan Rp39,93 miliar sehingga posisinya pada tahun 2021 mencapai Rp754,70 miliar dan Rp113,82 miliar. Sementara itu, beban operasional lainnya mengalami kenaikan sebesar 25,03%, menjadi Rp61,09 miliar di tahun 2021.

Berbagai hal yang disebutkan sebelumnya menyebabkan Bank Victoria Syariah berhasil mencatat laba operasional sebesar Rp12,25 miliar, sementara di tahun 2020 tercatat laba operasional sebesar Rp3,62 miliar. Rasio Kecukupan Modal (CAR) meningkat dari 24,69% di tahun 2020 menjadi 33,21% di tahun 2021. Sementara itu pendapatan bunga bersih (net imbalan) juga meningkat, dari 1,92% di tahun 2020 menjadi 2,68% di tahun 2021.

Selain itu, Imbal hasil rata-rata baik terhadap aset (ROA) maupun ekuitas (ROE) juga mengalami peningkatan, masing-masing menjadi 0,71% dan 1,79% pada tahun 2021. Di tahun 2020, ROA dan ROE tercatat sebesar 0,16% dan 1,51%.

In 2021, Bank Victoria Syariah recorded a decrease in total assets of 27.66% or Rp635.178 billion to Rp1.66 trillion. Furthermore, Bank Victoria Syariah's liabilities also decreased by 87.08% to Rp69.40 billion. Temporary *syirkah* funds were recorded at Rp1.23 trillion, a decrease of 10.78% from previously Rp1.38 trillion. The total equity of Bank Victoria Syariah also decreased by 4.90% to Rp360.96 billion from previously Rp379.56 billion.

Receivables and financing, as well as revenue from fund management by the Bank as Mudharib, decreased by Rp384.44 billion and Rp39.93 billion, respectively, resulting in the positions of Rp754.70 billion and Rp113.82 billion, respectively, in 2021. Meanwhile, other operating expenses increased by 25.03% to Rp61.09 billion in 2021.

The various matters mentioned above resulted in Bank Victoria Syariah successfully recording profit from operations of Rp12.25 billion, while in 2020 profit from operations was Rp3.62 billion. Capital Adequacy Ratio (CAR) increased from 24.69% in 2020 to 33.21% in 2021. Whereas, net interest income also increased from 1.92% in 2020 to 2.68% in 2021.

Furthermore, Return on Assets (ROA) and Return of Equity (ROE) also increased to 0.71% and 1.79%, respectively, in 2021. In 2020, ROA and ROE were recorded at 0.16% and 1.51%, respectively.



# Aspek Pendukung Bisnis

Aspect of Business Support

**Membentuk *Performance Oriented Culture***  
Forming a Performance Oriented Culture

**Melengkapi Cabang dengan Tim Sales yang Kompeten**  
Equipping Branch with Competent Sales Team

**Membentuk Victoria Corporate University**  
Forming Victoria Corporate University



**Key Element  
Strategy HC  
Bank Victoria**







## **Human Capital** Human Capital

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*Human Capital* (HC) menjadi salah satu keunggulan kompetitif untuk mendukung tercapainya kesuksesan Bank dalam menghadapi perkembangan teknologi dan perubahan pada industri keuangan. Berhubungan dengan hal tersebut, strategi dan pengelolaan HC di Bank Victoria senantiasa disesuaikan dengan strategi Bank dalam jangka panjang serta perkembangan pasar yang terjadi saat ini maupun masa yang akan datang.

Pengelolaan HC dimulai dengan menciptakan lingkungan kerja yang nyaman dan harmonis guna memupuk solidaritas dan loyalitas karyawan. Hal lain yang tidak kalah penting adalah dengan mengembangkan kualitas HC secara berkesinambungan, khususnya melalui pengembangan kompetensi. Pengembangan dilakukan secara menyeluruh di kantor pusat dan seluruh kantor cabang guna menjamin meratanya HC yang handal dan berkualitas. Hal tersebut merupakan upaya Bank dalam memastikan HC selalu memiliki kompetensi, keahlian dan komitmen, serta responsif terhadap perubahan dengan tetap berperilaku sesuai dengan nilai-nilai utama dan budaya Bank.

*Human Capital* (HC) is one of the competitive advantages to support the achievement of the Bank's success in dealing with technological development and financial industry transformations. With relation to such matters, HC strategies and management in Bank Victoria is consistently adjusted to the Bank's strategy in the long-term, as well as the current and future market development.

HC management starts from establishing comfortable and harmonious work environment in order to foster employee solidarity and loyalty. Another important matter is to continuously develop HC quality, especially through competency development. The development is carried out comprehensively at the head office and all branch offices in order to ensure an equal distribution of reliable and high-quality HC. This reflects the Bank's efforts in ensuring that the HC always has the right competency, expertise, commitment, and be responsive towards changes, whilst maintaining behavior that reflects the Bank's key values and culture.

## Kebijakan Pengelolaan *Human Capital*

Bank Victoria telah menetapkan panduan dan pedoman pengelolaan HC guna menjaga kesesuaian dan kebenaran praktik pengelolaan HC. Pedoman tersebut tertuang dalam Kebijakan dan Prosedur *Human Capital Management* yang telah disahkan serta dimutakhirkan berdasarkan Surat Keputusan Direksi No. 014/SK-DIR/07/19 tanggal 30 Juli 2019 tentang Standar Operasional Prosedur *Human Capital Management*. Kebijakan dan prosedur dimaksud mengatur hal-hal sebagai berikut.

Bab I	: Penerimaan Karyawan/Karyawati
Bab II	: Pelatihan dan Pendidikan Komisaris dan Direksi
Bab III	: Pelatihan dan Pendidikan Karyawan/Karyawati
Bab IV	: Beasiswa Pendidikan
Bab V	: Perjalanan Dinas
Bab VI	: Izin dan Cuti Karyawan/Karyawati
Bab VII	: Penilaian Karyawan/Karyawati
Bab VIII	: Mutasi, Rotasi, Promosi, dan Demosi
Bab IX	: Penggajian
Bab X	: Alih Daya ( <i>Outsourcing</i> )
Bab XI	: Pengunduran Diri Karyawan/Karyawati
Bab XII	: Sertifikasi Manajemen Risiko
Bab XIII	: Penerapan Prinsip <i>Know Your Employee</i> (KYE)

## Roadmap Pengelolaan *Human Capital*

Dalam merencanakan pengelolaan HC, Bank menyusun *roadmap* pengelolaan HC sebagai bagian yang tidak terpisahkan dari Rencana Bisnis Bank (RBB) Periode 2022-2024, yaitu "*Innovation and Governance for Higher Level Convenience Banking*".

Berikut beberapa *key element strategy* yang telah dan akan terus diterapkan Bank.

1. Membentuk *Performance Oriented Culture*  
Menerapkan *performance management process* di semua organisasi yang didukung oleh *Key Performance Indicator* (KPI) yang jelas menggunakan *Balance Score Card* dan transparan, serta mekanisme penghargaan yang kuat.
2. Mengoptimalkan Dukungan SDM Berbasis Digital  
Menempatkan karyawan yang kompeten dan produktif terutama yang mampu beradaptasi dengan proses transformasi digital.

## Human Capital Management Policy

Bank Victoria has established HC management guidelines and directives in order to ensure the conformity dan accuracy of HC management practices. Such guidelines are set out in the Human Capital Management Policies and Procedures, validated and updated based on Board of Directors' Decision Letter No. 014/SK-DIR/07/19 dated 30 July 2019 on Standar Operating Procedures of Human Capital Management. These policies and procedures regulate the following matters.

Chapter I	: Acceptance of Male/Female Employees
Chapter II	: Training and Education of Commissioners and Directors
Chapter III	: Training and Education of Male/Female Employees
Chapter IV	: Education Scholarship
Chapter V	: Business Trip
Chapter VI	: Permission and Leave of Male/Female Employees
Chapter VII	: Performance Assessment of Male/Female Employees
Chapter VIII	: Transfer, Rotation, Promotion, and Demotion
Chapter IX	: Payroll
Chapter X	: Outsourcing
Chapter XI	: Resignation of Male/Female Employees
Chapter XII	: Risk Management Certification
Chapter XIII	: Implementation of Know Your Employee (KYE)

## Human Capital Management Roadmap

In planning the HC management, the Bank prepared a HC management roadmap as an inseparable part of the 2022-2024 Bank Business Plan (RBB), namely "*Innovation and Governance for Higher Level Convenience Banking*".

The following are key element strategies applied and will continue to be applied at the Bank.

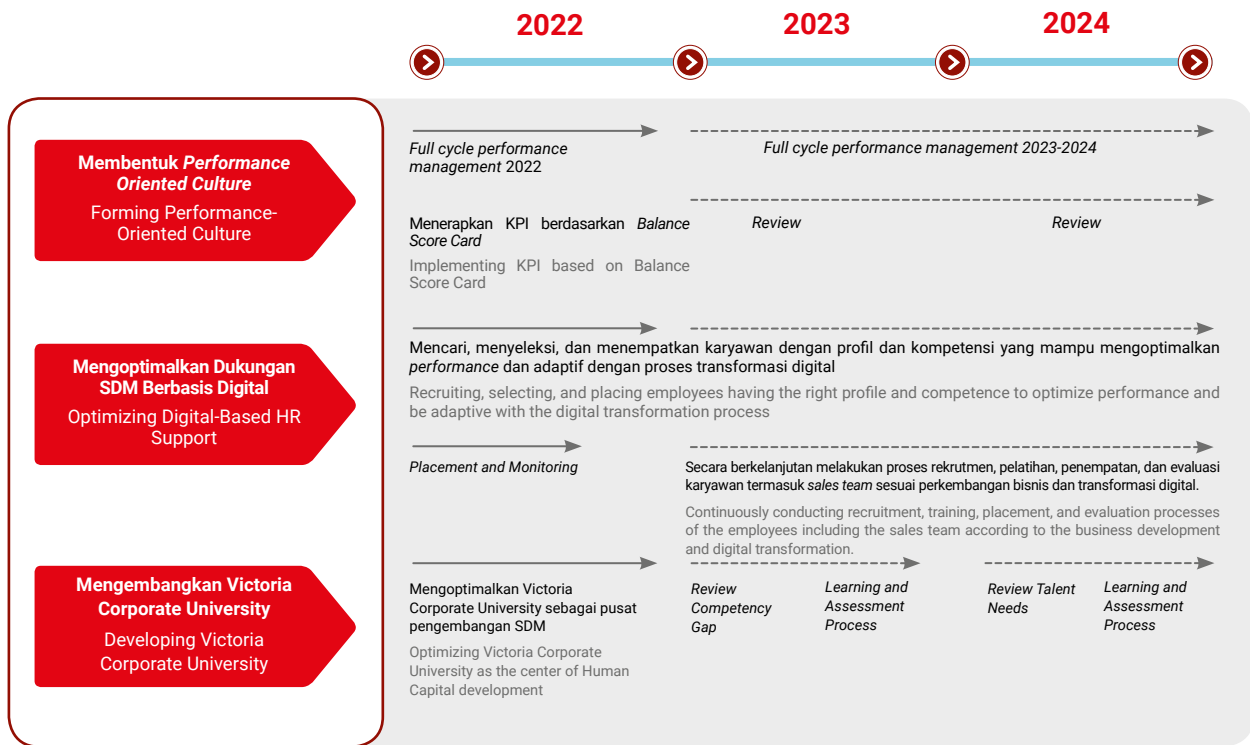
1. Forming Performance-Oriented Culture  
Implementing performance management process in the entire organization supported by clear and transparent Key Performance Indicators (KPI), using Balance Score Card and strong reward mechanism.
2. Optimizing Digital-Based HR Support  
Placing competent and productive employees, mainly those having the ability to adapt with digital transformation process.

3. Mengembangkan Victoria Corporate University  
Membentuk sumber daya manusia yang handal baik di Kantor Pusat dan Kantor Cabang melalui Victoria Corporate University dengan didukung oleh *learning management system, assessment center, dan talent pool*.

3. Developing Victoria Corporate University  
Establishing reliable human capital at Head Office and Branch Offices through Victoria Corporate University, supported by learning management system, assessment center, and talent pool.

Adapun penjabaran rencana *roadmap* 3 (tiga) tahun ke depan untuk strategi pengembangan HC sebagai berikut.

Explanation of roadmap plan of HC development strategies for the next 3 (three) years is as below.

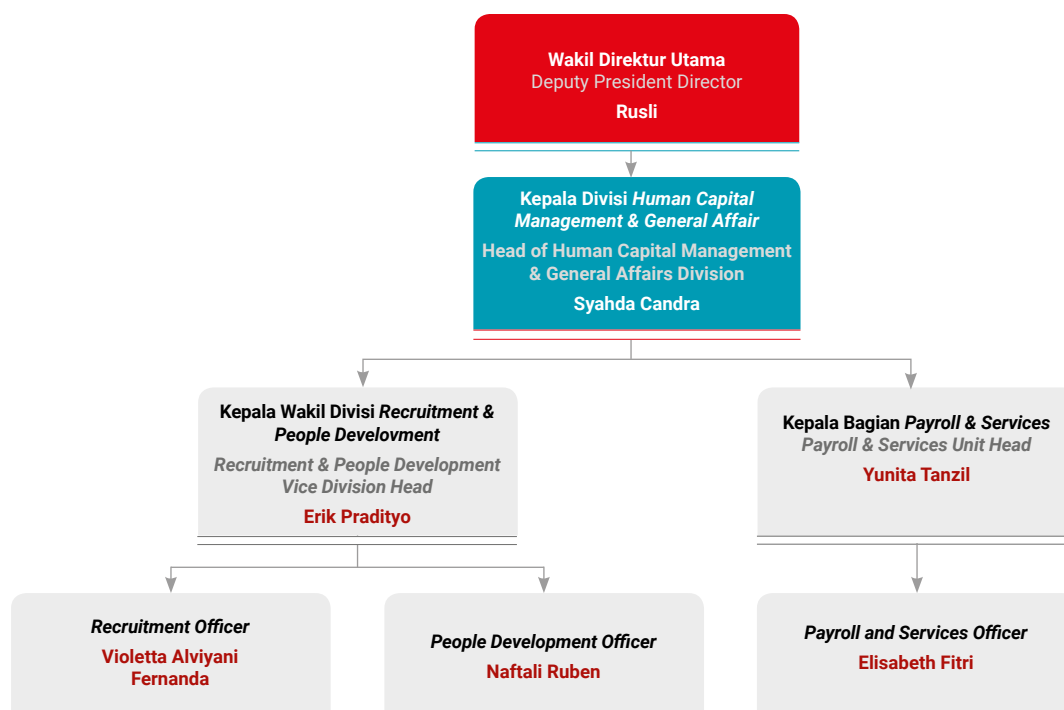


### Struktur Pengelola Human Capital

Divisi *Human Capital Management & General Affair* melakukan pengelolaan HC di Bank dengan dibantu oleh beberapa Unit Kerja yang dimiliki. Dalam melakukan pengelolaan HC, Direksi memimpin langsung Divisi *Human Capital Management & General Affair* beserta Unit Kerja yang dimilikinya. Sedangkan, pelaksanaan tugas oleh Divisi *Human Capital Management & General Affair* bertanggung jawab secara langsung kepada Wakil Direktur Utama. Berikut struktur organisasi pengelola HC Bank Victoria.

### Human Capital Management Structure

The Human Capital Management & General Affairs Division manages the Bank’s HC with the support of several subordinating units. In managing HC, the Divisions and Work Units are under the direct supervision of the Board of Directors. The implementation of duties of the Human Capital Management & General Affairs Division is directly under the responsible of the Deputy President Director. The organizational structure of Bank Victoria’s HC management is shown as follows.



Adapun fungsi dan ruang lingkup tugas terkait HC dari masing-masing Unit Kerja pada Divisi *Human Capital Management & General Affair* diuraikan sebagai berikut.

The functions and scope of duties related to HC in each Work Unit of the Human Capital Management and General Affairs Division are described as follows.

Organisasi Organizations	Fungsi Functions	Ruang Lingkup Tugas Scope of Duties
Divisi <i>Human Capital Management &amp; General Affair</i> Human Capital Management & General Affairs Division	Sebagai Unit Kerja yang mengelola kebijakan di bidang sumber daya manusia. As the Work Unit managing policies in human resources field.	Mengelola, mengawasi dan melaksanakan: <ul style="list-style-type: none"> <li>• Perencanaan;</li> <li>• Pengelolaan dan administrasi bidang rekrutmen;</li> <li>• Pendidikan dan pengembangan HC;</li> <li>• Administrasi gaji dan kesejahteraan HC; serta</li> <li>• Pengadministrasian data HC.</li> </ul> Manage, monitor, and implement: <ul style="list-style-type: none"> <li>• Planning;</li> <li>• Management and administration of recruitment;</li> <li>• HC education and development;</li> <li>• HC salary administration and welfare; and</li> <li>• Administering HC data.</li> </ul>
<i>Recruitment and People Development</i>	Sebagai Unit Kerja yang membantu Kepala Divisi <i>Human Capital Management &amp; General Affair</i> dalam mengelola pelaksanaan rekrutmen/penempatan, serta mengelola pelaksanaan pendidikan dan pengembangan HC. As the Work Unit assisting the Head of Human Capital Management & General Affairs Division in the implementation of recruitment/placement, and managing HC's education and development.	<ul style="list-style-type: none"> <li>• Mengusulkan, melaksanakan penerimaan dan penempatan HC, melakukan administrasi surat penerimaan dan mutasi, pengarsipan dokumentasi HC, pembuatan surat pengangkatan jabatan, dan pengadministrasian lainnya; dan</li> <li>• Mengelola, merencanakan, dan mengadministrasi seluruh kegiatan yang berhubungan dengan pendidikan dan pengembangan HC, seperti seminar dan pelatihan, baik internal maupun eksternal.</li> <li>• Propose, carry out recruitment and placement of HC, carry out administration of recruitment and transfer letter, archive HC documentation, make appointment letter for promotion, and other administration work; and</li> <li>• Manage, plan, and administer all activities related to HC education and development, such as seminar and training programs, both internal and external.</li> </ul>

Organisasi Organizations	Fungsi Functions	Ruang Lingkup Tugas Scope of Duties
<i>Payroll and Services</i>	<p>Sebagai Unit Kerja yang membantu Kepala Divisi <i>Human Capital Management &amp; General Affair</i> dalam mengelola pelaksanaan imbalan/gaji dan kesejahteraan HC.</p> <p>As the Work Unit assisting the Head of Human Capital Management &amp; General Affairs Division in managing the the implementation of the HC's rewards/salaries and welfare.</p>	<p>Mengelola dan melaksanakan kebijakan Direksi mengenai gaji, bonus, THR, pajak penghasilan 21 dan 23, lembur, pinjaman, cuti, BPJS Ketenagakerjaan, BPJS Kesehatan, dan asuransi kesehatan HC.</p> <p>Manage and implement the Board of Directors' policies on salaries, bonuses, THR, Income Tax 21 and 23, overtime, loans, leaves, BPJS Employment, BPJS Health, and HC's health insurance.</p>

## Perencanaan Kebutuhan Human Capital

Bank Victoria melakukan perencanaan kebutuhan HC (*man power planning*) setiap tahun dengan mempertimbangkan pertumbuhan bisnis dan rencana pengembangan usaha Bank. Perencanaan HC dilakukan berdasarkan hasil identifikasi dari persyaratan yang dibutuhkan dan disesuaikan dengan standar formasi, serta pertimbangan kinerja dan potensi di tahun 2021. Hal ini dilakukan agar dapat memberikan hasil terbaik guna mendukung pelaksanaan strategi bisnis yang ditetapkan oleh Bank Victoria.

Untuk tahun 2021, strategi perencanaan kebutuhan dijalankan dengan melakukan optimalisasi dan sinergi seluruh HC. Rekrutmen dilakukan bertujuan untuk memenuhi kekosongan jabatan karena adanya karyawan yang mengundurkan diri, promosi, maupun rotasi karyawan.

## Rekrutmen Human Capital

Rekrutmen HC di Bank Victoria dilakukan dengan membuka seluas-luasnya kesempatan kepada seluruh kandidat, tanpa diskriminasi terhadap perbedaan suku, agama, ras, maupun golongan politik. Selain itu, pelaksanaan rekrutmen juga mengutamakan tenaga kerja lokal (dalam negeri) sebagai bentuk pemberian kesempatan kerja bagi masyarakat Indonesia.

Berdasarkan kebijakan dan produser Human Capital Management yang telah disahkan melalui Surat Keputusan Direksi No. 014/SK-DIR/07/19 tanggal 30 Juli 2019 tentang Standar Operasional Prosedur *Human Capital Management*, kelompok tenaga kerja yang direkrut meliputi:

## Planning for Human Capital Needs

Bank Victoria plans HC needs (manpower planning) each year by considering the Bank's business growth and business development plan. HC planning is also carried out based on the identification of requirements needed and adjusted to the formation standards, as well as consideration of the performance and potential in 2021. This is done in order to provide the best results to support the implementation of the business strategy set by Bank Victoria.

The strategies used for planning needs in 2021 were carried out by optimizing and synergizing the entire HC. Recruitment is carried out to aim at filling vacancies due to employee's resignations, promotions, or rotations.

## Human Capital Recruitment

HC recruitment in Bank Victoria is conducted by providing the widest possible opportunity for all candidates, without any discrimination to ethnicity, religion, race, and political group. Furthermore, the recruitment also prioritizes local (domestic) workforce as a form of providing the widest possible employment opportunities for Indonesian people.

Based on Human Capital Management policies and procedures, which were approved under Board of Directors' Decision Letter No. 014/SKDIR/07/19 dated 30 July 2019 on Standard Operating Procedures of Human Capital Management, the manpower group recruited consists of:



Tahapan-tahapan dalam proses rekrutmen Bank Victoria ditunjukkan sebagai berikut.

Phases in Bank Victoria recruitment process is as shown below.

<p><b>Mengidentifikasi jabatan yang kosong dan kebutuhan tenaga kerja.</b></p> <p>Proses rekrutmen dimulai saat adanya bidang pekerjaan baru di Bank, karyawan dipindahkan atau dipromosikan ke posisi lain, mengajukan permintaan pengunduran diri, adanya pemutusan hubungan kerja (PHK), dan lain-lain. Dengan melihat dinamika dari beberapa hal tersebut dan mencocokkannya dengan perencanaan HC yang telah disusun, maka akan diketahui jabatan apa saja yang sedang kosong dan berapa jumlah tenaga kerja yang dibutuhkan untuk mengisi jabatan tersebut.</p>	<p><b>Identifying vacant positions and manpower requirements.</b></p> <p>The recruitment process begins with vacancy in the Bank, employees rotated or promoted to other positions, submission of a request for resignation, termination of employment (PHK), etc. By viewing the dynamics from some of these matters and matching them with the pre-compiled HC planning, vacancy and number of manpower required to fill those positions will be identified.</p>
<p><b>Mencari informasi jabatan melalui analisa jabatan.</b></p> <p>Guna mendapatkan uraian jabatan dan spesifikasi jabatan sebagai landasan dalam membuat persyaratan jabatan, Bank menerapkan sistem persyaratan jabatan secara hati-hati dan sejelass mungkin, sehingga kandidat yang didapatkan benar-benar sesuai dengan yang diperlukan.</p>	<p><b>Looking for information on positions through position analysis.</b></p> <p>In order to get the job description and job specification as the basis in preparing job requirements, the Bank carefully applies a job requirement system as clear as possible, so that candidates screened are truly the required ones.</p>
<p><b>Menetapkan sumber, media, dan sarana untuk mendapatkan kandidat yang tepat.</b></p> <p>Dalam mencari kandidat, terdapat 2 (dua) alternatif, yaitu dari dalam Bank atau dari luar Bank. Rekrutmen dari dalam dilakukan apabila kebutuhan staf untuk masa yang akan datang telah direncanakan, sehingga diketahui karyawan yang ada saat ini yang dapat dipindahkan atau dipromosikan. Sedangkan, rekrutmen dari luar dilakukan dengan pertimbangan cermat tentang metode rekrutmen yang tepat untuk mendapatkan kandidat tersebut.</p>	<p><b>Determining the source, media, and facilities to obtain the right man on the right place.</b></p> <p>There are 2 (two) alternatives to select candidates, i.e. from the Bank's internal source and external source. Internal recruitment is conducted in the event that the need for staff in the future has already been planned, and therefore, the currently available employees who can be rotated or promoted are identified. Whereas, external recruitment is conducted with careful consideration of the right recruitment method to choose the candidates.</p>
<p><b>Memilih metode-metode proses rekrutmen yang tepat.</b></p> <p>Bank memiliki banyak metode dalam melakukan rekrutmen, di antaranya iklan, <i>job posting</i>, <i>employee referrals</i>, <i>walk-ins</i> dan <i>write-ins</i>, <i>head hunter</i>, lembaga pendidikan, serta berbagai sumber lain. Pemilihan metode rekrutmen Bank dapat lebih dari satu metode, tergantung pada situasi dan kondisi yang terjadi saat itu.</p>	<p><b>Selecting accurate methods for recruitment process.</b></p> <p>There are many recruitment methods that can be selected by the Bank in conducting recruitment, such as advertisement, job posting, employee referrals, walk-ins and write-ins, head hunters, education institutions, and other sources. The Bank can also choose more than one method, depending on the current situation and condition.</p>
<p><b>Menyaring dan menyeleksi kandidat.</b></p> <p>Prosedur seleksi perlu dilakukan dengan alasan:</p> <ol style="list-style-type: none"> <li>Pelaksanaan tugas pada jabatan yang akan diisi memerlukan ciri-ciri fisik dan psikis tertentu yang tidak dimiliki oleh setiap orang;</li> <li>Ada lebih banyak kandidat yang tersedia dibandingkan total jabatan yang akan diisi;</li> <li>Ada banyak teknik atau metode seleksi yang digunakan oleh Bank dalam menyaring karyawan; dan</li> <li>Masing-masing teknik seleksi mengukur karakteristik tertentu, sehingga akan memberi informasi yang berbeda-beda mengenai kandidat.</li> </ol>	<p><b>Screening and selecting candidates.</b></p> <p>The selection procedure needs to be done due to the following reasons:</p> <ol style="list-style-type: none"> <li>The implementation of duties in the positions to be filled requires certain physical and psychological characteristics that not all people possess;</li> <li>There are more candidates available compared to the number of positions to be filled;</li> <li>There are many selection techniques or methods used by the Bank in screening employees; and</li> <li>Each selection technique will measure certain characteristic, and thus, it will give different information on the candidates.</li> </ol>

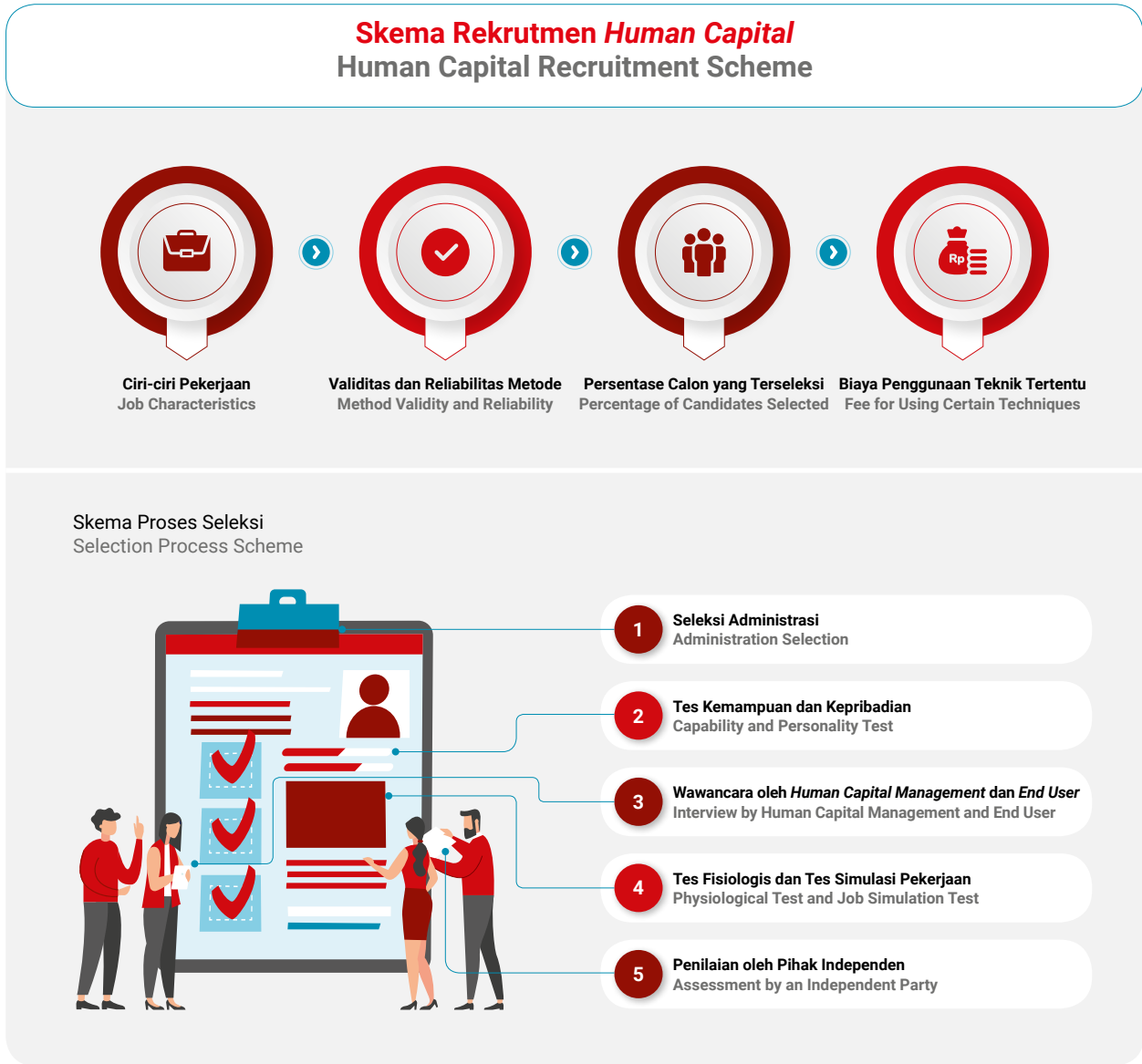


### Skema Rekrutmen *Human Capital*

Proses seleksi dalam rekrutmen HC Bank Victoria menggunakan suatu metode sebagai *predictor* yang sangat tergantung pada:

### Human Capital Recruitment Scheme

Bank Victoria's HC recruitment and selection process uses a method as a predictor which is highly dependent on:



### Pengembangan Kompetensi *Human Capital*

Bank Victoria memberikan kesempatan bagi setiap karyawan untuk mengembangkan kompetensi, baik secara personal maupun profesional. Hal ini merupakan bentuk komitmen Bank untuk memastikan kualitas dan kapabilitas HC agar sesuai dengan yang dibutuhkan. Keikutsertaan karyawan dalam pengembangan kompetensi ditentukan oleh kebutuhan Bank dan karyawan dengan memperhatikan kesetaraan gender dan persamaan kesempatan bagi seluruh HC Bank, baik bagi HC yang baru direkrut maupun yang telah ada, serta bagi staf maupun non-staf.

### Human Capital Competency Development

Bank Victoria gives opportunity for each employee to develop the competence, either personally or professionally. This is a form of the Bank's commitment to ensuring HC quality and capability in order to meet requirements. Employee's participation in the competency development is determined by the Bank's and employee's needs with due observance of gender equality and equal opportunities for all of the Bank's HC, either for new recruited or existing HC, as well as for staffs or non-staffs.



Bank Victoria telah membentuk *Corporate University* yang disebut Victoria Corporate University (VCU) sebagai sarana program pembelajaran dan pengembangan kompetensi karyawan seiring dengan perkembangan bisnis Bank. Dengan adanya VCU, diharapkan dapat menjadi motor penggerak untuk mewujudkan SDM yang profesional dan berkompentensi tinggi sebagai sumber keunggulan dan pendukung daya saing perusahaan.

Bank Victoria has established a Corporate University named Victoria Corporate University (VCU) as employee's learning program and competency development tools, aligned with the Bank's business development. VCU is expected to be a driving force to achieve professional and highly competent HC as a source of excellence and support to the Company's competitiveness.



Selain VCU, salah satu media pengembangan kompetensi HC yaitu melalui pemberdayaan program pendidikan dan pelatihan yang didasarkan pada kebutuhan pengembangan individu untuk menunjang keberhasilan kinerja dan karier. Program pendidikan dan pelatihan tersebut disesuaikan dengan Rencana Pelatihan Tahunan yang disusun berdasarkan *Training Need Analysis*.

In addition to VCU, as one of the media for HC competency development, the Bank also empowers education and training programs based on the needs for individual development to support success in performance and career. Such education and training programs are adjusted to the Annual Training Plan prepared based on Training Need Analysis.

#### Pengembangan Kompetensi Tahun 2021

Pada tahun 2021, Bank Victoria telah mengikutsertakan karyawan pada berbagai program pengembangan kompetensi sesuai dengan kebutuhan jabatan masing-masing. Program kompetensi tersebut diikuti oleh 5.444 peserta dengan total jam pelatihan mencapai 20.503 jam atau setara dengan 4 jam/orang. Berikut rincian pelatihan yang dilaksanakan pada tahun 2021.

#### Competency Development in 2021

In 2021, Bank Victoria enrolled its employees in various competency development programs according to the needs of their respective positions. The competence programs were attended by 5,444 participants with total training hours reaching 20,503 hours or equivalent to 4 hours/person. Details of trainings conducted in 2021 are as follows.

#### Pengembangan Kompetensi Karyawan berdasarkan Strata Jabatan Employees Competency Development by Level of Position

Jenis Pelatihan Type of Training	Jumlah Peserta Total Participants					Total Peserta Total Participants	Komposisi Composition (%)
	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	Manajer Manager	Officer	Non-Staff		
Training/Inhouse	14	29	1,531	2,842	399	4,815	88.45
Refreshment Training	3	4	18	11	0	36	0.66
Training/Public	0	4	105	98	0	207	3.80
Seminar/Public	1	7	150	115	0	273	5.01
Certification	4	4	57	19	0	84	1.54
Certification Training	1	0	18	7	0	26	0.48
Educational Scholarship	0	0	2	1	0	3	0.06
<b>Total</b>	<b>23</b>	<b>48</b>	<b>1,881</b>	<b>3,093</b>	<b>399</b>	<b>5,444</b>	<b>100.00</b>
<b>Komposisi (%) Composition (%)</b>	<b>0.42</b>	<b>0.88</b>	<b>34.55</b>	<b>56.81</b>	<b>7.33</b>	<b>100.00</b>	

**Materi Pengembangan Kompetensi**  
Competency Development Material

Materi Material	Penyelenggara Organizer	Waktu Time	Tujuan Objectives
<b>Training/Inhouse</b>			
Accelerated Changes in The Reinvented Banking	Internal Bank	Januari January	Pembahasan terkait target tahun 2021 dan evaluasi terkait kinerja Bank Victoria tahun 2020 Discussion regarding 2021 target and evaluation related to Bank Victoria's 2020 performance
Risk Register	Internal Bank	Februari February	<i>Focus Group Discussion</i> terkait pengisian dan perhitungan <i>risk register</i> Focus Group Discussion regarding the completion and calculation of risk register
Consumer Loan & KPR Consumer Loan & Mortgage Loan	PT Synergi Daya Utama	Maret March	Menambah dan memperbaharui pengetahuan terkait bidang <i>consumer loan</i> dan KPR, agar dapat mengembangkan bisnis bidang <i>consumer</i> dan KPR Enhancing and renewing business knowledge with relation to consumer loan and mortgage loan in order to develop consumer and mortgage loan business
Lakukan Perubahan Secara Bersama-sama Jointly Making New Changes	Internal Bank	Maret March	Menanamkan budaya kerja sama bagi seluruh karyawan Bank Victoria untuk berubah kearah yang lebih baik Embedding the culture of cooperation for all of Bank Victoria's employees for a better change
Perubahan Budaya - SQEW dan <i>Greeting Frontliners</i> Cultural Change - SQEW and Greeting Frontliners	Internal Bank	Maret March	Menanamkan budaya kerja baru dan <i>refreshment greeting</i> bagi <i>frontliners</i> Embedding new work culture and refreshment greeting for frontliners
Penguatan Sistem Pengendalian Internal Berbasis COSO dengan Memanfaatkan Teknologi Reinforcement of COSO Based Internal Control System Utilizing the Technology	Eksternal Bank - Bapak Lim Kurnawain dan Ibu Agnes Theres (Praktisi Bidang Internal Audit) Bank's External - Mr. Lim Kurniawan and Mrs. Agnes Theres (Internal Audit practitioners)	Maret March	Menambah dan memperbaharui pengetahuan terkait pengendalian <i>internal control</i> berbasis COSO dengan memanfaatkan teknologi Enhancing and renewing knowledge regarding COSO based internal control system by utilizing the technology
Root Cause Analysis	Internal Bank	Mei May	Menambah pengetahuan terkait <i>root cause analysis</i> bagi audit internal dan <i>operation</i> Enhancing knowledge regarding root cause analysis for internal audit and operations
Manual Pindad EDC	Internal Bank	Mei May	Memperbaharui pengetahuan terkait pemakaian mesin EDC Renewing knowledge regarding the use of EDC machines
APU PPT, Implementasi Pendekatan Berbasis Risiko TPPU/TPPT pada Perbankan AML-CTF, Implementation of TPPU/TPPT Risk Based Approach in the Banking system	PT Andara Sarana	Mei May	Menambah dan memperbaharui pengetahuan karyawan terkait APU-PPT dan TPPU/TPPT Enhancing and renewing employee's knowledge regarding AML-CTF and TPPU/TPPT
Katalog Produk Product Catalog	Internal Bank	Mei May	Memperbaharui pengetahuan karyawan terkait <i>update</i> produk Bank Victoria Renewing employee's knowledge regarding updates on Bank Victoria's products
Analisa Perkreditan Perkebunan Kelapa Sawit Credit Analysis for Oil Palm Plantation	PT Synergi Daya Utama	Juni June	Menambah pengetahuan terkait proses pemberian kredit pada industri perkebunan kelapa sawit Enhancing knowledge regarding the process of loan provision for oil palm plantation industry

<b>Materi Material</b>	<b>Penyelenggara Organizer</b>	<b>Waktu Time</b>	<b>Tujuan Objectives</b>
Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)	PT Andara Sarana	Juni June	Menambah pengetahuan terkait proses pelaporan <i>financial integrity rating</i> (pencucian uang dan pendanaan teroris) Enhancing knowledge regarding reporting process of financial integrity rating (money laundering and terrorists funding)
Aspek Hukum Tranformasi Digital Legal Aspects of Digital Transformation	Kanatta Daya Indonesia	Juni June	Menambah pengetahuan dalam bidang hukum terkait transformasi digital yang berkembang pesat saat ini Enhancing legal knowledge related to digital transformation which is currently developing rapidly
To Grow CASA & Add New to Bank Client	Internal Bank dan Bapak W Adji Wibowo (Praktisi Bidang Perbankan) Bank's Internal and Mr. W Adji Wibowo (Banking Sector practitioner)	Juni June	Menambah pengetahuan untuk bisa menumbuhkan CASA dan NTB di Bank Victoria Enhancing knowledge in order to grow CASA and NTB in Bank Victoria
Perkembangan Digitalisasi BCA dan Penanganan <i>Cyber Crime</i> Perbankan Development of BCA Digitalization and Banking Cyber Crime Handling	Maisa Edukasi	Agustus dan November August and November	Menambah pengetahuan terkait digitalisasi dunia perbankan dan penanganan kejahatan <i>cyber</i> perbankan Enhancing knowledge related to banking world digitalization and banking cyber crime handling
Risiko Operasional dan Risiko Reputasi terhadap <i>Fraud</i> Operational Risks and Reputation Risks with relation to Fraud	Internal Bank	Agustus dan November August and November	Menambah pengetahuan terkait risiko operasional dan risiko reputasi berkaitan dengan <i>fraud</i> Enhancing knowledge regarding operational risks and reputation risks with relation to fraud
Product Knowledge	Internal Bank	Agustus dan November August and November	Menambah pengetahuan terkait pengetahuan produk Bank Victoria bagi karyawan Kantor Cabang Enhancing knowledge regarding Bank Victoria's product knowledge for Branch Office employees
Mitigasi Kejadian <i>Fraud</i> melalui Penguatan Tata Kelola Bank Mitigation of Fraud through Reinforcement of Bank Governance	Asia Anti Fraud	September	Menambah pengetahuan terkait <i>fraud</i> dan penguatan tata kelola bank Enhancing knowledge related to fraud and reinforcement of bank governance
Technical Analysis Trading Forex	Internal Bank dan Bapak Soenawo (Praktisi Bidang <i>Forex</i> ) Bank's Internal and Mr. W Soenawo (Forex Sector practitioner)	September	Menambah dan memperbaharui pengetahuan terkait analisa teknikal pada bidang <i>trading forex</i> Enhancing and renewing knowledge regarding forex trading technical analysis
Surat Utang Negara (SUN) Ritel (Obligasi Negara Ritel (ORI), NTB, dan <i>Score Card</i> ) Government Promissory Notes (SUN), Retail (Retail Government Bonds (ORI), NTB, and Score Card	Internal Bank	September	Menambah pengetahuan terkait produk SUN Ritel serta diskusi terkait pertumbuhan NTB dan <i>Score Card</i> Enhancing knowledge regarding SUN Retail and discussion regarding NTB and Score Card growth
SUN Ritel ORI	Internal Bank	September	Menambah pengetahuan terkait produk SUN Ritel ORI Enhancing knowledge regarding SUN Retail ORI products
<i>Flow</i> Transaksi Reksadana Mutual funds Transactions Flow	Internal Bank	Oktober October	Menambah pemahaman terkait <i>flow</i> pembukaan produk reksadana Enhancing knowledge regarding flow of mutual fund products opening

Materi Material	Penyelenggara Organizer	Waktu Time	Tujuan Objectives
Digital Transformation Improving the Odds of Success	Internal Bank dan Bapak Rio Lanasier (Praktisi Bidang Perbankan) Bank's Internal and Mr. Rio Lanasier (Banking Sector practitioner)	Oktober October	Menambah pengetahuan terkait transformasi digital yang terjadi saat ini Enhancing knowledge related to digital transformation currently occurring
Audit Kredit Credit Audit	Internal Bank dan Bapak Efendi Sitompul (Praktisi Bidang Audit Perbankan) Bank's Internal and Mr. Efendi Sitompul (Bank Auditing practitioner)	Oktober October	Menambah pengetahuan terkait proses audit kredit Enhancing knowledge regarding credit audit
Aplikasi <i>Wealth Management</i> (Reksa Dana) Wealth Management Application (Mutual Fund)	Internal Bank	Oktober October	Menambah pengetahuan terkait proses pengajuan pembelian produk reksadana Enhancing knowledge regarding the process of mutual fund products purchasing request
<i>Self Assessment, Focus Group Discussion</i> , dan Pelatihan Penerapan Program APU-PPT Self Assessment, Focus Group Discussion, and Training for Implementation of AML-CTF Program	Internal Bank	November	<i>Focus Group Discussion</i> terkait penerapan program APU-PPT di Kantor Cabang Focus Group Discussion regarding implementation of AML-CTF program in Branch Offices
Transaction Banking	Internal Bank dan Bapak Tri Nugroho (Praktisi Bidang Perbankan) Bank's Internal and Mr. Tri Nugroho (Banking Sector Practitioner)	November	Menambah pengetahuan dari karyawan terkait pengembangan bisnis <i>transaction banking</i> Enhancing knowledge of employees related to transaction banking business development
Loan Monitoring & Control (Early Warning Signal)	Kanatta Daya Indonesia	November	Menambah pengetahuan terkait mekanisme serta peranan <i>early warning signal</i> dalam proses perkreditan bank Enhancing knowledge related to mechanism and role of early warning signal in bank loan process
<i>Officer Development Program</i> Bisnis Angkatan ke-3 Officer Development Business Program for the 3 <sup>rd</sup> Batch	Internal Bank	November dan Desember November and December	Program pengembangan calon pegawai bidang bisnis Development program for business sector prospective employees
The World of Treasury from Risk and Monitoring Perspective	Talindo Edukasi Mandiri	Desember December	Menambah pengetahuan Divisi <i>treasury</i> terkait penanganan risiko dan <i>monitoring</i> terhadap transaksi <i>treasury</i> Enhancing the Treasury Division's knowledge regarding risk management and monitoring of treasury transaction
Managing Credit Risk	Talindo Edukasi Mandiri	Desember December	Menambah pengetahuan terkait penanganan risiko kredit Enhancing knowledge regarding credit risk management
Governance, Risk, and Compliance	Internal Bank	Desember December	Menambah pengetahuan terkait perkembangan <i>governance, risk, dan compliance</i> pada saat ini Enhancing knowledge related to development of current governance, risk, and compliance
Aplikasi Bank Persepsi Collecting Bank Application	Internal Bank	Desember December	Menambah pengetahuan dalam penggunaan aplikasi bank persepsi Enhancing knowledge regarding the use of collecting bank application

Materi Material	Penyelenggara Organizer	Waktu Time	Tujuan Objectives
<b>Training Refreshment</b>			
<i>Bank Fraud Prevention &amp; How To Mitigate dan Pentingnya Cyber Security dalam Digitalisasi Bank dan Kaitannya dengan Risiko Operasional</i> Bank Fraud Prevention & How To Mitigate and the Importance of Cyber Security in Bank Digitalization and the Relation with Operational Risks	Maisa Edukasi	Mei May	Program <i>refreshment</i> sertifikat manajemen risiko bagi karyawan Risk management certificate refreshment program for employees
<i>Refreshment Sertifikasi Treasury Dealer Intermediate</i> Intermediate Treasury Dealer Certification Refreshment	ACI Indonesia The Financial Markets Association	Juli July	Program <i>refreshment</i> sertifikat <i>treasury</i> bagi karyawan Treasury certificate refreshment program for employees
<i>Refreshment Sertifikasi Treasury Dealer Advance</i> Advance Treasury Dealer Certification Refreshment	ACI Indonesia The Financial Markets Association	Juli dan Desember July and December	Program <i>refreshment</i> sertifikat <i>treasury</i> bagi karyawan Treasury certificate refreshment program for employees
<i>Refreshment Core Banking System dan Evaluasi Setoran Bayaran Tahun 2021</i> Core Banking System Refreshment and Evaluation of Payment Deposit for 2021	Bank Indonesia	November	<i>Refreshment core banking system</i> bagi karyawan <i>operation</i> Core banking system refreshment for operational employees
<i>Identifikasi Transaksi Keuangan Mencurigakan</i> Identification of Suspicious Financial Transactions	Forum Komunikasi Direktur Kepatuhan Perbankan Communication Forum of Banking Compliance Directors	Desember December	Program <i>refreshment</i> sertifikat kepatuhan bagi karyawan Compliance certificate refreshment program for employees
<b>Training/Public</b>			
<i>Aspek Finansial dan Hukum Restrukturisasi, M&amp;A, Holdingisasi dan Valuasi Perusahaan</i> Financial and Legal Aspects of Restructuring, M&A, Holdings, and Valuation of Companies	Indonesia Training Institute & Consulting Services	Februari February	Menambah pengetahuan terkait aspek finansial dan hukum restrukturisasi, holdingisasi, dan valuasi perusahaan terkait pemberian kredit Enhancing knowledge regarding financial and legal aspects of company restructuring, holdings, and valuation related to loan provision
<i>Remuneration Management</i> Management Remuneration	GNV Consulting Learning Center	Februari February	Menambah pengetahuan terkait proses dan aspek pemberian remunerasi Enhancing knowledge related to process and aspects of remuneration provision
<i>Social Media Management</i>	GNV Consulting Learning Center	Februari February	Menambah wawasan terkait penggunaan dan manajemen media sosial untuk dapat meningkatkan <i>brand</i> Enhancing insights related to the use and management of social media to improve branding
<i>Aspek Hukum Tanda Tangan Elektronik dan Keamanan Data Nasabah dalam Layanan Keuangan Berbasis Teknologi Informasi</i> Legal Aspect of Electronic Signature and Customer Data Security in Information Technology Based Financial Services	PT Mardika Edukasi Gemilang	Februari February	Menambah wawasan terkait aspek hukum penggunaan tanda tangan elektronik dan keamanan data nasabah dalam layanan keuangan berbasis teknologi informasi Enhancing insights related to the legal aspect of the use of electronic signature and customer data security in information technology based financial services
<i>Penetration Etichal Hacking</i>	PT Solusi Teknologi Terpadu	Mei May	Menambah pengetahuan dan keterampilan dalam aspek pencegahan <i>hacking</i> pada sistem, jaringan, dan aplikasi Enhancing knowledge and skill in aspects of prevention of hacking of system, network, and application

Materi Material	Penyelenggara Organizer	Waktu Time	Tujuan Objectives
Public Speaking Mastery	Next Leader Consulting	Mei May	Menambah kemampuan dalam <i>public speaking</i> sebagai pengajar Improving public speaking skill in teaching profession
Penerapan <i>Governance Risk dan Compliance</i> di Era Digital: Strategi dan Aksi Implementation of Governance Risk and Compliance in Digital Era: Strategy and Action	Otoritas Jasa Keuangan Financial Services Authority	Juni June	Menambah pengetahuan terkait <i>governance risk dan compliance</i> di era digitalisasi Enhancing knowledge related to governance risk and compliance in digitalized era
Meningkatkan Efektivitas Program Pemulihan Ekonomi Nasional Enhancing the Effectiveness of National Economic Recovery Program	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Juni June	Menambah wawasan terkait <i>update</i> program pemulihan nasional Enhancing insights regarding update on national recovery program
Procurement & Purchasing Management	Galeri Human Capital Human Capital Gallery	Juni June	Menambah pengetahuan dalam proses <i>procurement dan purchasing</i> Enhancing knowledge in procurement and purchasing process
<i>Winning Culture: Memperkuat Budaya Perusahaan untuk Memenangkan Persaingan</i> Winning Culture: Strengthening Company's Culture in Order to Win Competition	Galeri Human Capital Human Capital Gallery	Juni June	Menambah pengetahuan dan keterampilan dalam proses pembentukan dan sosialisasi <i>corporate culture</i> Enhancing knowledge and skill in the process of corporate culture establishment and dissemination
Self Coaching	Louis Sastrawijaya	Juni June	Menambah kemampuan dalam aspek <i>coaching</i> Enhancing coaching skills
ICSA CF Officer Workshop Series	Indonesia Corporate Secretary Association	Juni June	Menambah wawasan dalam menjalankan tugas sebagai sekretaris perusahaan Enhancing insights in performing duties as corporate secretary
Legal & Compliance Aspect in Fraud Risk Management	IPC Learning & Consulting	Juni June	Menambah pengetahuan aspek hukum dan kepatuhan dalam mengelola risiko Enhancing knowledge regarding legal and compliance aspects in managing risks
General Affair Management	GNV Consulting Learning Center	Juni June	Menambah pengetahuan dan kemampuan dalam pengelolaan <i>general affair</i> Enhancing knowledge and competence in managing general affairs
Pelatihan Lelang dalam Perspektif Penyelesaian Kredit Bermasalah Auction Training in the Perspective of Bad Credit Settlement	PT Nusantara Bona Pasogit	Juli July	Menambah pengetahuan dan kemampuan proses lelang dalam menyelesaikan kredit bermasalah Enhancing knowledge and competence in auction process for settlement of bad credits
<i>Loan Covid Restructuring After Implementaion of Peraturan Otoritas Jasa Keuangan No. 48/2020</i> Covid Loan Restructuring After Implementation of Financial Services Authority Regulation No. 48/2020	Bankers Association For Risk Management	Agustus August	Menambah pengetahuan terkait implementasi Peraturan Otoritas Jasa Keuangan No. 48/2020 terkait restrukturisasi pinjaman akibat pandemi Covid-19 Enhancing knowledge regarding implementation of Financial Services Authority Regulation No. 48/2020 regarding loan restructuring due to Covid-19 pandemic
Perhitungan IRRBB Pendekatan NII dan EVE Sesuai Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018 (menggunakan aplikasi kertas kerja Ms. Excel) Calculation of IRRBB of NII and EVE Approach According to Financial Services Authority Circular No. 12/SEOJK.03/2018 (using Ms. Excel worksheet application)	Learning Media Indonesia	Agustus August	Menambah kemampuan dalam perhitungan IRRBB pendekatan NII dan EVE menggunakan kertas kerja Ms. Excel Enhancing the competence in calculating IRRBB of NII and EVE approach using Ms. Excel worksheet application
Ekonomi Sirkular: Aktivitas yang Menguntungkan Menuju Tujuan Pembangunan Berkelanjutan (SDGs) Circular Economic: Activities Intended for the Achievement of Sustainable Development Goals (SDGs)	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August	Menambah pengetahuan terkait pembiayaan berkelanjutan Enhancing knowledge regarding sustainable financing

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IT Business Analyst	GNV Learning Consulting	Agustus August	Meningkatkan wawasan terkait pengelolaan IT <i>Business Analyst</i> Enhancing insights regarding IT Business Analyst management
Menjadikan Industri Jasa Keuangan Adaptif dan Antisipatif - Sosialisasi Peraturan Otoritas Jasa Keuangan Terkini tentang Kelembagaan Bank, Percepatan Perizinan Produk Bank, dan Penguatan Penanganan Lembaga Jasa Keuangan Ensuring Adaptive and Anticipative Financial Services Industry - Dissemination of the Latest Financial Services Authority Regulation regarding Bank Institutional, Acceleration of Banking Products Licenses, and Reinforcement of Financial Services Institution Management	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August	Memberikan <i>update</i> terkait kelembagaan bank, percepatan perizinan produk bank, dan penguatan penanganan lembaga jasa keuangan Providing the latest update regarding bank institutional, acceleration of banking products licensing, and reinforcement of financial services institution management
<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom In Mitigating Risk</i> - Menyelaraskan Kebijakan dengan Lingkungan Bisnis Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Synchronizing Business Policies and Business Environment	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August	Menambah pengetahuan terkait penyelarasan kebijakan dan lingkungan bisnis Enhancing knowledge regarding synchronization between business policies and business environment
<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom In Mitigating Risk</i> - Manajemen Strategis Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Strategic Management	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August	Menambah pengetahuan terkait manajemen strategis pada era digital Enhancing knowledge regarding strategic management in digital era
<i>Digital Risk Leadership: Orchestrating Business &amp; Boardroom In Mitigating Risk</i> - Tantangan Pemimpin dan Pengelolaan SDM Digital Risk Leadership: Orchestrating Business & Boardroom In Mitigating Risk - Human Capital Leaders and management Challenges	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August	Menambah pengetahuan terkait pengelolaan SDM pada era digital Enhancing knowledge regarding Human Capital management in digital era
Upgrading Program for Bank Legal Officer (Junior - Middle Level)	PT Mardika Edukasi Gemilang	Agustus August	Menambah pengetahuan dari aspek hukum perbankan Enhancing knowledge from banking legal aspects
Pelatihan Gugatan Sederhana Sebagai Langkah Jitu Penyelesaian Kredit Macet pada Bank Simple Lawsuit Training as a Smart Measure in Resolving Bad Credits in the BankV	PT Nusantara Bona Pasogit	September	Memberikan wawasan tambahan terkait pelatihan gugatan dalam penyelesaian kredit macet pada bank Providing additional insights regarding lawsuit training in resolving bad credits in the bank
Urgensi dan Pelaksanaan Audit Keuangan dan Pemeriksaan atas Kerugian Negara serta Pemeriksaan Pajak di Lingkungan BUMN/ BUMD dan Kementrian, dan Swasta Urgency and Implementation of Financial Audit and Examination on the State Loss and Tax Audit in SOE/ROE and Ministry, and Private Sectors Environment	Lembaga Berantas Korupsi Indonesia Indonesian Corruption Eradication Institution	September	Menambah pengetahuan terkait pelaksanaan audit keuangan Enhancing knowledge regarding implementation of financial audit
Build & Implementation Corporate Culture	Internal Bank dan Bapak Blasius Haryanto Bank's Internal and Mr. Blasius Haryanto	September	Menambah pengetahuan dalam membangun dan implementasi budaya perusahaan Enhancing knowledge in developing and implementing corporate culture
Transformasi Perbankan melalui <i>Digital Banking Fintech</i> Banking Transformation through Digital Banking Fintech	Equivalent Training Center	September	Menambah wawasan terkait pengembangan <i>digital banking</i> Enhancing insights regarding digital banking development
Penerapan PSAK 73: Sewa Amandemen dan Aspek Perpajakannya Implementation of PSAK 73: Lease, Amendment and the Taxation Aspects	Ikatan Akuntan Indonesia	September	Menambah pengetahuan untuk penerapan PSAK 73 Enhancing knowledge for the implementation of PSAK 73



Materi Material	Penyelenggara Organizer	Waktu Time	Tujuan Objectives
Covid-19 Pandemic as a Momentum to Digitalizing L/C Business Process	Bank Indonesia	September	Menambah pengetahuan dalam proses digitalisasi LC Enhancing knowledge in the LC digitalization process
Risk Mitigation Strategy for L/C Transactions	Bank Indonesia	September	Menambah pengetahuan terkait strategi mitigasi risiko dalam transaksi LC Enhancing knowledge regarding risk mitigating strategy in LC transactions
<i>Advanced Liquidity Risk Management, Stress Testing &amp; Contingency Planning - Metode Pengelolaan Eksposur Risiko Likuiditas Secara Mendalam dari Konsep hingga Implementasi</i> Advanced Liquidity Risk Management, Stress Testing & Contingency Planning - In Depth Liquidity Risk Exposure Management Method from Concept to Implementation	Learning Media Indonesia	September	Menambah pengetahuan dan keterampilan dalam pengelolaan risiko likuiditas Enhancing knowledge and skills in managing liquidity risk
Membangun Manajemen Risiko Lengkap dan Sehat Establishing Complete and Sound Risk Management	Red & White Consulting Training	Oktober October	Menambah wawasan dalam membangun manajemen risiko yang lengkap dan sehat Enhancing insights in establishing complete and sound risk management
Merancang Produk Digital untuk Manajer Pengembangan Aplikasi TIK ( <i>Product Manager</i> ) Designing Digital Products for TIK Application Development Manager (Product Manager)	Ruangguru	Oktober October	Menambah kemampuan untuk dapat merancang produk digital Enhancing competence for digital products designing
Marketing Analytics for Experienced Marketers	Markplus Institute	Oktober October	Menambah kemampuan dalam menganalisa marketing proses yang dilakukan Enhancing competence in analyzing the marketing process performed
Data Science	PT Systech Global Informasi	Oktober October	Menambah kemampuan dalam data science Enhancing competence in data science
Asset Liability Management in Uncharted New Normal	Bankers Association For Risk Management	Oktober October	Menambah pengetahuan pengelolaan asset liability di dalam new normal Enhancing knowledge in managing asset and liability in the new normal
Developing Responsible Credit and Investment Policies	The Prakarsa	November	Menambah pengetahuan dalam proses pengembangan peraturan kredit dan investasi Enhancing knowledge in the process of developing credit and investment regulations
Perhitungan <i>Integrated Stress Test Model</i> (Risiko Likuiditas, Kredit, Pasar, dan Operasional) untuk Mengukur Tingkat Ketahanan Bank dan <i>Recovery Plan</i> dalam Kondisi Ekonomi Ekstrim Dampak Covid-19 Calculation of Integrated Stress Test Model (Liquidity, Credit, Market, and Operational Risks) to Measure the Bank Resilience Rating and Recovery Plan in Extreme Economic Condition from Covid-19 Impact	Banking Finance Development Center	November	Menambah kemampuan dalam membuat perhitungan <i>integrated stress test model</i> dan pembuatan <i>recovery plan</i> dampak pandemi Covid-19 Enhancing competence in calculating integrated stress test model and establishing recovery plan as Covid-19 countermeasure
Gender Equality & Inclusion in the Workplace: Moving Forward with Gender Equality & Inclusion in the Workplace	Indonesia Stock Exchange and Global Reporting Initiative	November	Menambah wawasan terkait kesetaraan gender di tempat kerja Enhancing insights related to gender equality at work place
Managing Waste & Circular Economy: Moving from Take - Make - Waste Economy to Circular Solutions	Indonesia Stock Exchange and Global Reporting Initiative	November	Menambah wawasan terkait ekonomi berkelanjutan Enhancing knowledge regarding sustainable economy
Health & Safety: Safety & Health for All Building Resilient OHS System	Indonesia Stock Exchange and Global Reporting Initiative	November	Menambah pengetahuan dalam keamanan pengelolaan gedung Enhancing knowledge related to building management security

<b>Materi Material</b>	<b>Penyelenggara Organizer</b>	<b>Waktu Time</b>	<b>Tujuan Objectives</b>
Bond Market Update and New Financial Accounting Standards	Perhimpunan Pedagang Surat Utang Association of Promissory Note Trader	November	Menambah pengetahuan dalam pasar saham dan standar akuntansi baru Enhancing knowledge regarding stock market and new accounting standards
Indonesia Financial Sector Outlook 2022: Reinforce Business Fundamental Post New Normal	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	November	Menambah wawasan terkait cara penguatan dasar bisnis setelah new normal Enhancing insights regarding basic business strengthening in new normal era
Connecting the Dots Showcasing the Potential of Innovative Credit Scoring	Fintech Indonesia dan Otoritas Jasa Keuangan Fintech Indonesia and Financial Services Authority	November	Menambah kemampuan dalam proses kredit <i>scoring</i> Enhancing competence in credit scoring process
Unstoppable Indonesia: Onward to New Horizon	PT Trimegah Asset Management	November	Memberikan wawasan terkait perkembangan ekonomi Indonesia Providing insights regarding Indonesia's economic development
Strategi Korporasi Berkelanjutan: Membangun Tata Kelola, Manajemen Risiko dan Kepatuhan Menuju Kinerja Berprinsip Sustainable Corporate Strategy: Establishing Governance, Risk and Compliance Management, Heading Towards Principle Based Performance	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	November	Memberikan wawasan terkait penyusunan berkelanjutan dalam membangun tata kelola, manajemen risiko, dan kepatuhan Providing insights regarding sustainable establishment of governance, risk management and compliance
Forkom Kas: Pembahasan Isu-isu Strategis terkait Bidang Pengelolaan Uang Rupiah Cash Forkom: Discussion on Strategic Issues Related to Rupiah Management	Bank Indonesia	November	<i>Focus group discussion</i> pembahasan isu-isu strategis terkait pengelolaan uang rupiah Focus Group Discussion regarding strategic issues related to rupiah management
Pengenalan Sistem Baru Bank Indonesia CBS Introduction to Bank Indonesia's New System CBS	Bank Indonesia	November	Memberikan pengetahuan terbaru terkait sistem Bank Indonesia CBS Providing new knowledge related to Bank Indonesia's CBS system
ALP Communication Business	Markplus Institute	November	Menambah kemampuan dan wawasan terkait komunikasi bisnis Enhancing competence and insights related to business communication
Peran Internal Audit dalam Penguatan Tata Kelola Perbankan di Tengah Pandemi Internal Auditor's Role in Strengthening Banking Corporate Governance Amid Pandemic	Otoritas Jasa Keuangan dan Ikatan Auditor Intern Bank Financial Services Authority and Bank Internal Auditor Association	Desember December	Menambah pengetahuan terkait peran internal audit dalam penguatan tata kelola bank di tengah pandemi Enhancing knowledge regarding internal auditor's role in strengthening banking corporate governance amid pandemic
Arah Perkembangan Perbankan Indonesia Tahun 2022 Ditengah Upaya Menuju Digitalisasi Perbankan The Direction of Indonesian Banking Development in 2022 Amid Attempts Towards Banking Digitalization	Forum Komunikasi Direktur Kepatuhan Perbankan Communications Forum of Banking Compliance Directors	Desember December	Menambah wawasan dan pengetahuan terkait arah perbankan menuju digitalisasi Enhancing insights and knowledge related to banking direction towards banking digitalization
Hukum Pertanahan, Perijinan, dan Penyelesaian Sengketa Pasca Undang-Undang Cipta Kerja Laws on Land, Permit, and Dispute Resolutions Subsequent to Job Creation Law	Pengurus Wilayah Jawa Barat IPPAT The Management of West Java Region IPPAT (Notary and Conveyancer Association)	Desember	Menambah pengetahuan terkait hukum pertanahan, perijinan, dan penyelesaian sengketa pasca Undang-Undang Cipta Kerja Enhancing knowledge regarding laws on land, permit, and dispute resolutions subsequent to Job Creation Law
Pelaksanaan Sistem Tata Kelola Perusahaan yang Baik untuk Meningkatkan Efektifitas Pemahaman dan Penerapan APU-PPT Implementation of good Corporate Governance System to Improve the Effectiveness of Comprehension and Implementation of AML-CTF	PT Andara Sarana	Desember December	Menambah pengetahuan terkait sistem tata kelola perusahaan dalam rangka meningkatkan efektifitas pemahaman dan penerapan APU - PPT Enhancing knowledge regarding corporate governance system for the purpose of improving the effectiveness of comprehension and implementation of AML-CTF
Banking and Financial Outlook 2022: Digital Tranformation for Reselience and Competitiveness in Post Pandemic Era	Warta Ekonomi	Desember December	Menambah pengetahuan terkait proyeksi transformasi digital tahun 2022 Enhancing knowledge regarding digital transformation projection in 2022

Materi Material	Penyelenggara Organizer	Waktu Time	Tujuan Objectives
<b>Seminar/Public</b>			
Corporate Restructuring Enhancing Economic and Social Value	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Januari January	Menambah pengetahuan di dalam restrukturisasi Enhancing knowledge regarding restructuring
Dampak Ekonomi Sawit bagi Daerah The Impact of Oil Palm Economic for the Region	Katadata dan / and Madani	Januari January	Menambah wawasan terkait dampak ekonomi industri sawit bagi daerah penghasil Enhancing insights regarding oil palm industry's economic impact for the producing region
Pengkinian Pedoman Penyelenggaraan PBK SPPUR dan Penyusunan Materi Pelatihan Update for the Guidelines of PBK SPPUR Implementation and the Preparation of Training Material	Bank Indonesia	Februari February	Menambah wawasan terkait <i>update</i> PBK SPPUR dan penyusunan materi pelatihan Enhancing insights regarding PBK SPPUR update and preparation of training material
Dari <i>Regulatory Sandbox</i> ke <i>Regtech</i> From Regulatory Sandbox to Regtech	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Februari February	Menambah pengetahuan terkait program <i>regulatory sandbox</i> bagi <i>fintech</i> Enhancing knowledge regarding regulatory sandbox program for fintech
Seminar Nasional: Kepastian Hukum sertifikat Elektronik terhadap Akta Pejabat Umum Notaris dalam Jabatan Pejabat Pembuat Akta Tanah (Kajian Peraturan Menteri Agraria dan Tata Ruang/Kepala Badan Pertanahan Nasional No. 1 Tahun 2021 tentang Sertipikat Elektronik) National Seminar: Legal Certainty of Electronic Certificate on Public Notary Deed in Land Conveyancer Position (Assessment of Minister of Agrarian Affairs and Spatial Planning/Head of National Land Agency Regulation No. 1 of 2021 on Electronic Certificate)	Pengurus Wilayah Jawa Barat Ikatan Pejabat Pembuat Akta Tanah dan Pengurus Wilayah Jawa Barat Ikatan Notaris Indonesia The Management of West Java Association of Land Conveyancer and Management of West Java Association of Indonesian Notary	Februari February	Menambah pengetahuan terkait kepastian hukum sertifikat elektronik terkait Peraturan Pertanahan Nasional No. 1 Tahun 2021 Enhancing knowledge regarding legal certainty of electronic certificate in relation to National Land Agency Regulation No. 1 of 2021
Conflict of Interest: Legal & Ethical Aspect	Association of Certified Fraud Examiners	Februari February	Menambah pengetahuan terkait aspek legal dan etik dalam kasus <i>fraud</i> Enhancing knowledge regarding legal and ethical aspect of fraud cases
International Seminar: How Indonesia's Financial Institutions & Stakeholders Respond to Climate Related Financial Risks	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Februari February	Menambah pengetahuan mengenai respon dari <i>financial institutions</i> terhadap risiko keuangan Enhancing knowledge regarding response from financial institutions on financial risks
Kasus-kasus <i>Governance</i> di Perbankan Governance Cases in the Banking institutions	Governance Risk Compliance Professional Indonesia	Februari February	Menambah wawasan dan <i>case study</i> terkait kasus-kasus <i>governance</i> di industri perbankan Enhancing insights and case study related to governance cases in banking industry
Kupas Tuntas Data <i>Science</i> dalam Industri Jasa Keuangan Comprehensive Discussion on Data Science in Financial Service Industry	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Februari February	Menambah pengetahuan terkait penerapan data <i>science</i> dalam industri jasa keuangan Enhancing knowledge regarding implementation of data science in financial service industry
Leading Multi-Generational Team	Next Leader Consulting	Februari February	Menambah kemampuan dalam memimpin multi generasi dalam tim Enhancing competence in leading multi generation in the team

<b>Materi Material</b>	<b>Penyelenggara Organizer</b>	<b>Waktu Time</b>	<b>Tujuan Objectives</b>
Menagih Hutang Itu Mudah Collecting Debt is Easy	Kontan Academy	Februari February	Menambah pengetahuan dan kemampuan dalam proses penagihan Enhancing knowledge and competence in debt collection process
Peran SNI dalam Membangun Organisasi yang Tangguh dan Berintegrasi dalam Persaingan Bisnis SNI's Roles in Building Strong Organization and Integrating in Business Competition	Badan Standardisasi Nasional National Standardization board	Maret March	Menambah wawasan terkait peran penting SNI dalam membangun organisasi yang tangguh dan berintegrasi Enhancing insights related to SNI's important roles in building resilient and integrated organization
Agile of Fragile? Great Start 2021 with Drastic Action Leadership	Forum Human Capital Perbankan Indonesia & Bank Mandiri Banking Human Capital Forum & Bank Mandiri	Maret March	Menambah pengetahuan terkait <i>action leadership</i> Enhancing knowledge related to action leadership
Penjelasan isi Peraturan Pemerintah Undang-Undang Cipta Kerja Disahkan 2 Februari 2021 Explanation Regarding the Content of Government Regulation on Job Creation Law Enacted on 2 February 2021	Compensation & Benefit Club	Maret March	Menambah wawasan terkait Peraturan Pemerintah Undang-Undang Cipta Kerja Enhancing insights regarding Government Regulation on Job Creation Law
HR Transformation to Win in Digital Competition	IPMI International Business School	Maret March	Menambah pengetahuan terkait transformasi HR di dalam kompetensi digital Enhancing knowledge regarding HR transformation in digital competence
Praktik Penggunaan Bahasa Indonesia dalam Kontak Komersial The Practice of the Use of Indonesian Language in Commercial Contact	Hukum Online.com dan / and HHP Law Firm	Maret March	Menambah kemampuan dalam penggunaan bahasa Indonesia dalam kontrak komersial Enhancing competence in the use of Indonesian language in commercial contact
Penguatan Hak Pengelolaan Pasca Berlakunya Undang-Undang Cipta Kerja The Strengthening of Right to Manage Subsequent to the Enactment of Job Creation Law	Pengurus Wilayah Jawa Barat Ikatan Pejabat Pembuat Akta Tanah dan Pengurus Wilayah Jawa Barat Ikatan Notaris Indonesia The Management of West Java Association of Land Conveyancer and Management of West Java Association of Indonesian Notary	Maret March	Menambah pengetahuan terkait hak pengelolaan pasca berlakunya Undang-Undang Cipta Kerja Enhancing knowledge regarding right to manage subsequent to the enactment of Job Creation Law
Efektivitas Pengawasan Dewan Komisaris dalam Menjaga Kepatuhan Bank untuk Menuju Era Pengaturan <i>Principle Based</i> Effectiveness of the Board of Commissioners Monitoring in Maintaining Bank's Compliance Towards Principle Based Management Era	Forum Komunikasi Direktur Kepatuhan Perbankan Communications Forum of Banking Compliance Directors	Maret March	Menambah pengetahuan terkait fungsi pengawasan dewan komisaris dalam menjaga kepatuhan menuju era pengaturan <i>principle based</i> Enhancing knowledge regarding function of Board of Commissioners in maintaining compliance towards principle-based management era
Sustainability Report	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April	Menambah pengetahuan terkait laporan berkelanjutan Enhancing knowledge regarding sustainability report

Materi Material	Penyelenggara Organizer	Waktu Time	Tujuan Objectives
Solving Scarcity of Leaders to Face the Era of VUCA	Infobank dan Ikatan Bankir Indonesia Infobank and Association of Indonesian Bankers	April	Menambah pengetahuan dalam skill pemimpin untuk mengatasi permasalahan menghadapi <i>volatility, uncertainty, complexity, and ambiguity</i> Enhancing knowledge regarding leadership skill in order to solve volatility, uncertainty, complexity, and ambiguity problems
Penyaluran Kredit Perbankan di Tengah Pandemi Distribution of Bank Credit Amid Pandemic	Ikatan Sarjana Ekonomi Indonesia Indonesian Association of Bachelor of Economics	April	Memberi pengetahuan bagi karyawan terkait proses penyaluran kredit di tengah pandemi Providing knowledge to the employees regarding credit distribution process amid pandemic
Modus Kejahatan Siber dalam Layanan Jasa Keuangan Cyber Crime Modes in Financial Services	PT Mardika Edukasi Gemilang	April	Memberikan pengetahuan modus-modus dan antisipasi kejahatan siber dalam layanan jasa keuangan Providing knowledge regarding modes and anticipation of cyber crime in financial services
Aspek Finansial dan Legal Merger, Akuisisi, dan Valuasi Bisnis Financial and Legal Aspects of Business Merger, Acquisition and Valuation	Indonesia Training Institute & Consulting Services	April	Menambah pengetahuan terkait aspek finansial dan legal merger, akuisisi, dan valuasi bisnis Enhancing knowledge related to financial and legal aspects of business merger, acquisition, and valuation
Managing Risk of Innovation and Digital Transformation in The New Economy Era	Indonesian Institute for Corporate Directorship	April	Menambah pengetahuan terkait pengelolaan risiko terhadap transformasi digital dalam era ekonomi baru Enhancing knowledge related to management of risk related to digital transformation in the new economic era
Penguatan Pengendalian Internal untuk Menciptakan Nilai Internal Control Strengthening in order to Generate Value	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April	Menambah wawasan dalam pengendalian internal Enhancing insights regarding internal control
Restrukturisasi Korporasi Seri 3: Aspek Hukum Corporation Restructuring 3rd Series: Legal Aspects	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	April	Memberikan pengetahuan restrukturisasi korporasi dalam aspek hukum Providing knowledge regarding corporation restructuring in legal aspects
Cyber Crime Typology & Cross Border Money Laundering	Forum Komunikasi Direktur Kepatuhan Perbankan Communications Forum of Banking Compliance Directors	April	Memberikan pengetahuan terkait tipologi kejahatan siber dan pencucian uang Providing knowledge regarding cyber crime and money laundering typology
Human Capital Investment in Digital Era	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Mei May	Memberikan pengetahuan terkait <i>human capital</i> di era digital Providing knowledge related to human capital in digital era
Agile HR in Your Organization	Sakura System Solutions	Mei May	Memberi wawasan terkait HR yang <i>agile</i> di dalam organisasi Providing insights related to agile HR in organization
Launching Cetak Biru Pengembangan Sumber Daya Manusia (SDM) Sektor Jasa Keuangan (SJK) 2021-2025 Launching the Blue Print of Human Resources (HR) Development for Financial Services Sector (SJK) For 2021-2025	Otoritas Jasa Keuangan Financial Services Authority	Mei May	Memberi pengetahuan cetak biru pengembangan SDM sektor jasa keuangan tahun 2021-2025 Providing knowledge regarding the blue print of HR development for financial services sector for 2021-2025

<b>Materi Material</b>	<b>Penyelenggara Organizer</b>	<b>Waktu Time</b>	<b>Tujuan Objectives</b>
Sosialisasi Jaminan Kehilangan Pekerjaan Dissemination of Unemployment Insurance	BPJS Ketenagakerjaan BPJS Employment	Juni June	Memberikan <i>update</i> informasi terkait penerapan jaminan kehilangan pekerjaan Providing update on information related to unemployment insurance
Diseminasi Pedoman Penyelenggaraan Pelatihan Berbasis Kompetensi Sistem Pembayaran Pengelolaan Uang Rupiah dan Sosialisasi Persiapan Akreditasi Lembaga Pelatihan Kerja Dissemination of Guidelines for Implementation of Competence Based Trainings Related to Payment System, Rupiah Management and Dissemination of Preparation For Work Training Institution Accreditation	Bank Indonesia	Juni June	Memberi pengetahuan bagi lembaga pelatihan kerja terkait penyelenggaraan berbasis kompetensi SPPUR dan persiapan akreditasi Providing knowledge to work training institutions related to implementation of competence based SPPUR and accreditation preparation
Kuangan Berkelanjutan dalam Pemulihan Ekonomi Nasional Sustainable Finance in National Economic Recovery	Lembaga Pengembangan Perbankan Indonesia & Alika Indonesian Banking Development Institute & Alika	Juni June	Memberi pengetahuan terkait penerapan keuangan berkelanjutan dalam rangka pemulihan ekonomi nasional Providing knowledge regarding implementation of sustainable finance for the purpose of national economic recovery
Digitalisasi Sistem Pembayaran dan Masa Depan Jasa Keuangan di Indonesia Digitalization of Payment System and the Future of Financial Services in Indonesia	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan - Efektif Pro Association of Financial Services Industry Competence Development - Effective Pro	Juni June	Menambah pengetahuan terkait digitalisasi sistem pembayaran dan masa depan jasa keuangan di Indonesia Enhancing knowledge related to digitalization of payment system and the future of financial services in Indonesia
Quo Vadis Hubungan Industrial Pasca Undang-Undang Cipta Kerja dan Peraturan Pemerintah di Sektor Perbankan Quo Vadis Industrial Relation Subsequent to Job Creation Law and Government Regulation in Banking Sector	Forum <i>Human Capital</i> Perbankan Indonesia Indonesian Banking Human Capital Forum	Juli	Memberi pengetahuan terkait pengetahuan hubungan industrial pasca Undang-Undang Cipta Kerja di sektor perbankan Providing knowledge related to industrial relations subsequent to Job Creation Law in the banking sector
Sertifikasi Kompetensi Manajemen SDM: Wajib atau Butuh? Certification of HR Management Competency: Compulsory or Requirement?	Forum <i>Human Capital</i> Perbankan Indonesia Indonesian Banking Human Capital Forum	Juli July	Diskusi antara praktisi HC perbankan terkait penerapan sertifikasi manajemen SDM Discussion between banking HC practitioners related to implementation of HR management certification
<i>Assets Recovery Strategy During Pandemic: Posisi Debt Collector di Mata Hukum dan Sosial?</i> Assets Recovery Strategy During Pandemic: Debt Collector's Position from the Perspective of Law and Social?	Infobank	Juli July	Memberi pengetahuan terkait aset <i>recovery strategy</i> Providing knowledge related to assets recovery strategy
<i>Link &amp; Match</i> bagi Trainer Kompeten Link & Match for Competence Trainers	Samita Daniswara Mandiri Eduction & Certification	Juli July	Menambah kemampuan bagi calon trainer Enhancing competence for potential trainers
Good Corporate Governance to Build Ethical Culture	IPC Learning & Consulting	Juli July	Menambahkan pengetahuan terkait penerapan GCG untuk membangun budaya etis Enhancing knowledge related to GCG implementation to establish ethical culture
Adapting & Sustaining the Indonesian Financial Services Sector in The Era of Digital Transformation & Industry 4.0 - Human Capital & Talent Management Perspective	Perkumpulan Pengembangan Kompetensi Industri Jasa Keuangan & Efektif Pro Association of Financial Services Industry Competence Development & Effective Pro	Agustus August	Memberikan penambahan wawasan terkait <i>human capital</i> dan <i>talent management</i> di era transformasi digital dan industri 4.0 Providing additional insights related to human capital and talent management in digital transformation era and 4.0 industry

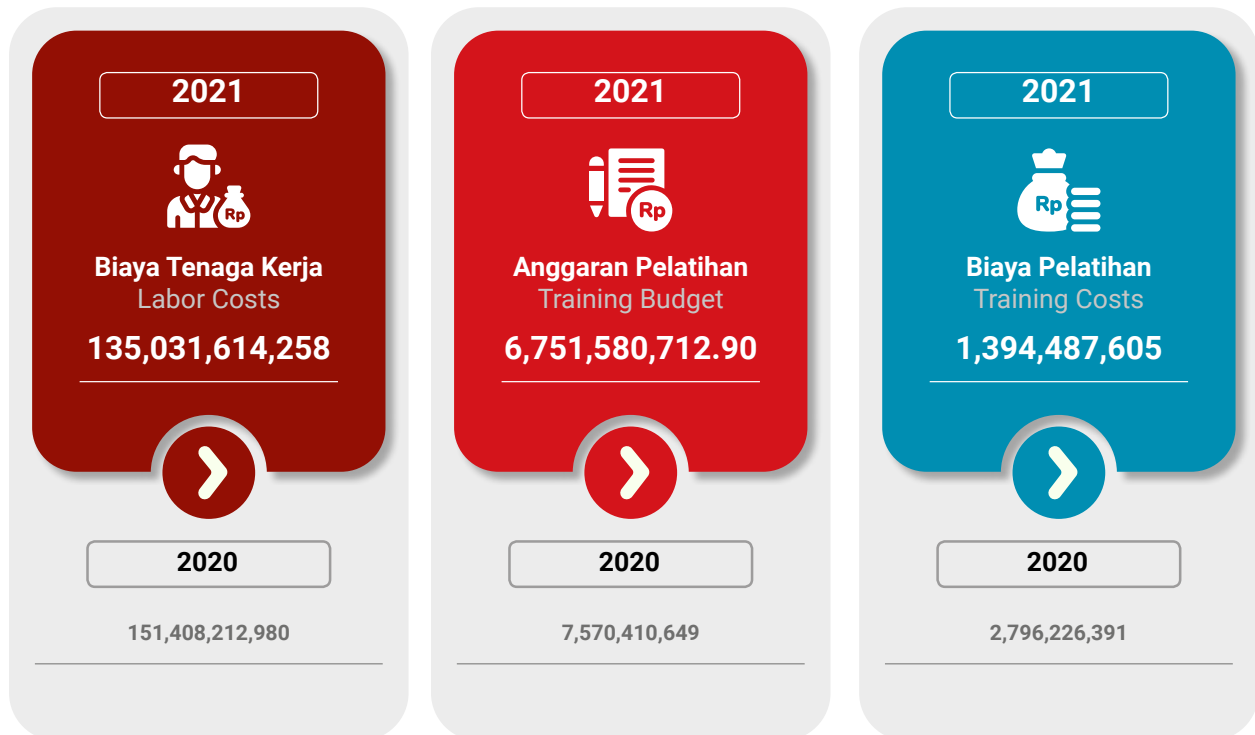
Materi Material	Penyelenggara Organizer	Waktu Time	Tujuan Objectives
3 Ways of Being A Good Trainer	3Maktakterbatas	Agustus August	Memberikan wawasan untuk bisa menjadi seorang trainer yang baik Providing insights to be a good trainer
Sosialisasi ATMR Operasional Dissemination of Operational RWA	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August	Menambah wawasan terkait perkembangan ATMR operasional Enhancing insights regarding development of operational RWA
ATMR Operasional dan Budaya Manajemen Risiko Operational RWA and Risk Management Culture	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Agustus August	Menambah wawasan terkait perkembangan ATMR operasional dan budaya manajemen risiko Enhancing insights regarding Development of operational RWA and risk management culture
Sosialisasi tentang Tanggung Jawab Pelaku Usaha Jasa Keuangan terhadap Tindakan <i>Fraud</i> Pegawainya Dissemination on Financial Services Business Entity's Responsibilities against Fraudulent Actions Committed by their Employees	Otoritas Jasa Keuangan Financial Services Authority	Agustus August	Memberikan pengetahuan terkait tanggung jawab pelaku usaha jasa keuangan terhadap kasus <i>fraud</i> pada karyawan Providing knowledge regarding financial services business entity's responsibilities against fraud cases committed by their employees
Mengelola Risiko Siber dalam Industri Digital Managing Cyber Risks in Digital Industry	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	September	Menambahkan pengetahuan terkait mengelola risiko siber dalam industri digital Enhancing knowledge regarding managing cyber risks in digital industry
Sosialisasi: Pengembangan SDM Industri Jasa Keuangan di Era Keuangan Digital Dissemination: Development of Financial Services Human Capital in Digital Financial Era	Lembaga Pengembangan Perbankan Indonesia Indonesian Banking Development Institute	Oktober October	Menambahkan pengetahuan terkait pengembangan SDM industri jasa keuangan di era keuangan digital Enhancing knowledge regarding development of financial services Human Capital in digital financial era
Sosialisasi Pengisian Form Cetak Biru Pengembangan Sumber Daya Manusia Sektor Jasa Keuangan Dissemination of Completion of Blue Print Form for the Human Capital Development of Financial Services Sector	Perhimpunan Bank Nasional National Bank Association	Oktober October	Menambahkan pengetahuan terkait tata cara pelaporan form cetak biru pengembangan sumber daya manusia sektor jasa keuangan Enhancing knowledge regarding procedures to report blue print form for the human capital development of financial services sector
Seminar dan <i>Workshop</i> Penyusunan Rencana Aksi Nasiona (RAN) SDGs Seminar and Workshop for Preparation of National Action Plan (RAN) of SDGs	Bursa Efek Indonesia dan Bappenas Indonesia Stock Exchange and Bappenas	Oktober October	Memberikan pengetahuan terkait RAN sesuai <i>sustainable finance</i> Providing knowledge regarding RAN according to sustainable finance
Sosialisasi Kebijakan Terkini SPBI Dissemination of the SPBI's Most Updated Policies	Ikatan Kliring Perbankan Bandung Bandung Banking Clearing Association	Oktober October	Menambah <i>update</i> terkait sosialisasi terkait SPBI Enhancing update on dissemination related to SPBI
<i>Economic Outlook</i> 2022: Prospek Ekonomi Makro dan Sektor Keuangan 2022 Economic Outlook 2022: Macro Economic and Financial Sector Prospects in 2022	Berita Satu Media Holdings	November	Memberikan pengetahuan terkait prospek ekonomi makro dan sektor keuangan tahun 2022 Providing knowledge regarding macro economics and financial sector prospect in 2022
Penguatan Keuangan Hijau dalam Menjawab Tantangan dan Peluang Perubahan Iklim bagi Stabilitas Sistem Keuangan The Strengthening of Green Finance in Response to Challenges and Opportunities of Climate Changes for the Stability of Financial System	Infobank Institute dan Bank Indonesia Infobank Institute and Bank Indonesia	Desember December	Menambah pengetahuan mengenai keuangan berkelanjutan terkait perubahan iklim bagi stabilitas sistem keuangan Enhancing knowledge regarding sustainable finance related to climate change for the stability of financial system
Tantangan Milenial Merebut Peluang Akses Pembiayaan dalam Ekosistem UMKM dan Ekonomi Hijau Millennial Challenges in Seizing Opportunities to Financing Access in MSME Ecosystem and Green Economic	Otoritas Jasa Keuangan Financial Services Authority	Desember December	Memberikan wawasan terkait tantangan bagi SDM milenial dalam ekosistem UMKM dan ekonomi hijau Providing insights regarding challenges for the millennial human resources in MSME ecosystem and green economic



<b>Materi Material</b>	<b>Penyelenggara Organizer</b>	<b>Waktu Time</b>	<b>Tujuan Objectives</b>
<b>Certification</b>			
Perpanjangan Sertifikasi Manajemen Risiko Renewal of Risk Management Certification	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	Mei May	Memenuhi persyaratan pembaharuan sertifikasi sesuai ketentuan Meeting the requirement for certification renewal according to the requirements
Sertifikasi Manajemen Risiko Level 1 Level 1 Risk Management Certification	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	Mei May	Memenuhi persyaratan kompetensi dan sertifikasi manajemen risiko level 1 Meeting the requirement for level 1 risk management competency and certification
Program Sertifikasi <i>Certification in Audit committee Practices</i> (CACP) Certification in Audit Committee Practices Program (CACP)	Indonesia Institute of Audit Committee	Agustus August	Peningkatan kompetensi komisaris Competence Development for the Board of Commissioners
Sertifikasi Kepatuhan Level 1 Level 1 Compliance Certification	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	September	Memenuhi persyaratan kompetensi dan sertifikasi kepatuhan level 1 Meeting the requirement for level 1 compliance competence and certification
Sertifikasi Wali Agen Penjual Efek Reksadana (WAPERD) Certification of Representative of Mutual Fund Selling Agent (WAPERD)	Asosiasi Pelaku Reksa Dana dan Investasi Indonesia Association of Mutual Fund Business Entity and Indonesian Investment	September	Memenuhi persyaratan kompetensi dan sertifikasi yang dibutuhkan untuk proses penjualan reksadana Meeting requirement for competence and certification required for mutual fund selling process
Perpanjangan sertifikat Wali Agen Penjual Efek Reksadana (WAPERD) Extension for Certification of Representative of Mutual Fund Selling Agent (WAPERD)	Asosiasi Pelaku Reksa Dana dan Investasi Indonesia Association of Mutual Fund Business Entity and Indonesian Investment	September	Memenuhi persyaratan kompetensi dan sertifikasi yang dibutuhkan untuk proses penjualan reksadana Meeting requirement for competence and certification required for the process of mutual fund selling process
Ujian Sertifikasi CAFM CAFM Certification Exam	Asia Anti Fraud	November	Peningkatan kompetensi karyawan Improvement of employee's competence
Perizinan - Pengelolaan Investasi - Wali Agen Penjual Efek Reksadana (WAPERD) Licensing - Investment Management - Representative of Mutual Fund Selling Agent (WAPERD)	Otoritas Jasa Keuangan Financial Services Authority	November	Memenuhi persyaratan kompetensi dan sertifikasi yang dibutuhkan untuk proses penjualan reksadana Meeting requirement for competence and certification required for the process of mutual fund selling process
Sertifikasi Audit Level Auditor Auditor Level of Audit Certification	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	November	Memenuhi persyaratan kompetensi dan sertifikasi audit Meeting the requirement for audit competence and certification
Refreshment Sertifikasi <i>Treasury Dealer Basic</i> Refreshment Certification for Basic Treasury Dealer	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	Juli July	Memenuhi persyaratan pembaharuan sertifikasi sesuai ketentuan Meeting the requirement for certification renewal according to the requirements
Refreshment Sertifikasi <i>Treasury Dealer Intermediate</i> Intermediate Treasury Dealer Certification Refreshment	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	Oktober October	Memenuhi persyaratan pembaharuan sertifikasi sesuai ketentuan Meeting the requirement for certification renewal according to the requirements
Refreshment Sertifikasi <i>Treasury Dealer Advance</i> Advance Treasury Dealer Certification Refreshment	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution	Juli dan Desember July and December	Memenuhi persyaratan pembaharuan sertifikasi sesuai ketentuan Meeting the requirement for certification renewal according to the requirements
Pendidikan Profesi Lanjutan (PPL) Wali Agen Penjual Efek Reksadana (WAPERD) Advance Professional Education (PPL) for Representative of Mutual Fund Selling Agent (WAPERD)	Asosiasi Pelaku Reksa Dana dan Investasi Indonesia Association of Mutual Fund Business Entity and Indonesian Investment	Desember December	Memenuhi persyaratan kompetensi dan sertifikasi yang dibutuhkan untuk proses penjualan reksadana Meeting requirement for competence and certification required for the process of mutual fund selling process

Materi Material	Penyelenggara Organizer	Waktu Time	Tujuan Objectives
<b>Training-Certification</b>			
Pembekalan <i>Certified Information System Auditor</i> Briefing for Certified Information System Auditor	PT Systech Global Informasi	Maret 2021 March 2021	Program pembekalan sertifikasi <i>certified information system auditor</i> Briefing program for certification process of certified information system auditor
Persiapan Ujian Sertifikasi Wali Agen Penjual Efek Reksadana (WAPERD) Preparation for the Certification Exam of Representative of Mutual Fund Selling Agent (WAPERD)	Internal Bank	Agustus 2021 August 2021	Mempersiapkan karyawan agar bisa mengikuti ujian sertifikasi Wali Agen Penjual Efek Reksadana (WAPERD) Preparing employees so that they can participate in certification exam for the Representative of Mutual Fund Selling Agent (WAPERD)
Program Pelatihan Sertifikasi <i>Certification in Audit Committee Practices (CACP)</i> Training Program for Certification in Audit Committee Practices Program (CACP)	Indonesia Institute of Audit Committee	Agustus 2021 August 2021	Pelatihan persiapan dalam ujian sertifikasi <i>certification in audit committee practices (CACP)</i> Preparation training for certification in audit committee practices (CACP) exam
Persiapan Ujian Sertifikasi Kepatuhan Level 1 Preparation of Level 1 Compliance Certification Exam	Forum Komunikasi Direktur Kepatuhan Perbankan Communications Forum of Banking Compliance Directors	September 2021	Pelatihan persiapan dalam ujian sertifikasi kepatuhan Training preparation for compliance certification exam
Guide to CAFM Certification	Asia Anti Fraud	November 2021	Pelatihan persiapan dalam ujian sertifikasi CAFM Training preparation for CAFM certification exam
Pembekalan Sertifikasi Audit Level Auditor Briefing for Auditor Level Audit Certification	Efektifpro	November 2021	Program pembekalan sertifikasi audit Briefing program for audit certification
<b>Educational Scholarship</b>			
Beasiswa S1 Manajemen YAI Bachelor Scholarship in Management - YAI	Universitas Persada Indonesia Y.A.I	Februari dan September February and September	Meningkatkan kompetensi karyawan atas nama Yannu Arisman dengan memberikan kesempatan ke jenjang pendidikan kuliah yang lebih tinggi melalui pemberian beasiswa S1 Ekonomi Enhancing employee's competence under the name of Yannu Arisman by giving opportunity to obtain higher education through scholarship for Bachelor degree o Economics
Beasiswa Karyawan S2 Program Magister Manajemen Employees Scholarship for Master Program in Management Studies	Universitas Pelita Harapan	Februari February	Meningkatkan kompetensi karyawan atas nama Elisabeth Fitri dengan memberikan kesempatan ke jenjang pendidikan kuliah yang lebih tinggi melalui pemberian beasiswa S2 Magister Manajemen Enhancing employee's competence under the name of Elisabeth Fitri by giving opportunity to obtain higher education through scholarship for Master degree in Management

## Biaya Pengembangan Kompetensi (Rp) Competency Development Cost (Rp)



### Knowledge Management

Bank Victoria melaksanakan *Knowledge Management* yang dikelola melalui VCU guna mendukung proses pendistribusian ilmu pengetahuan secara menyeluruh dan terstruktur. Hal ini juga bertujuan untuk menghimpun seluruh pengetahuan, keterampilan dan pengalaman kerja HC menjadi sumber informasi yang dapat diakses oleh seluruh HC agar dapat meningkatkan kompetensinya. Pelaksanaan *Knowledge Management* melalui VCU selain dari pertemuan tatap muka melalui *training class room*, *sharing session*, serta sosialisasi, juga dilakukan melalui beberapa sarana, seperti *e-learning*, intranet V-Smart, dan Vic-News.

### Evaluasi Pengembangan Kompetensi

Bank melalui VCU melakukan evaluasi setelah pelatihan melalui *Form Evaluasi Pasca Training* guna mengukur efektivitas pelaksanaan sistem pelatihan dan pengembangan HC. Hasil evaluasi akan menjadi salah satu bahan pertimbangan dalam mengarahkan dan meningkatkan kebutuhan pelatihan lanjutan HC.

### Penilaian Kinerja Human Capital

Pelaksanaan penilaian kinerja karyawan secara khusus diatur dalam Sistem Penilaian Kinerja Karyawan yang termuat dalam Standar Operasional Prosedur *Human Capital Management*

### Knowledge Management

Bank Victoria carries out Knowledge Management, administered by VCU, in order to support the process of comprehensive and structured knowledge distribution. This is intended to compile all HC knowledge, skills, and work experience to become a source of information accessible by all HC in order to improve the competencies. The implementation of Knowledge Management through VCU, apart from face-to-face meetings through classroom training, sharing sessions, and dissemination, it is also carried out through several channels, such as e-learning, V-Smart intranet, and Vic-News.

### Competency Development Evaluation

The Bank through VCU conducts post-training evaluation using the Post-Training Evaluation Form in order to measure the effectiveness of the implementation of HC training and development system. The evaluation outcome will become one of the considerations in directing and enhancing future training requirement.

### Human Capital Performance Assessment

Employee's performance assessment is specifically regulated in the Employee's Performance Assessment System set out in the Standard Operating Procedure of Human Capital

yang telah disahkan melalui Surat Keputusan Direksi No. 014/SK-DIR/07/19 tanggal 30 Juli 2019. Pelaksanaan penilaian juga disesuaikan dengan Peraturan Perusahaan, Surat Edaran Direksi, Surat Keputusan Direksi, kaidah-kaidah umum tentang penilaian HC, serta kebiasaan yang ada di lingkungan Bank.

Bank Victoria melaksanakan penilaian kinerja HC berdasarkan pada pencapaian kinerja sesuai dengan:

Management which was approved under the Board of Directors' Decision Letter No. 014/SK-DIR/07/19 dated 30 July 2019. The assessment is also adjusted to the Company Regulations, Board of Directors' Circular, Board of Directors' Decision, and the existing norms within the Bank's scope.

Bank Victoria conducts HC performance assessment based on the performance achievement in accordance with:

### Penilaian Kinerja Human Capital Human Capital Performance Assessment

<p><b>Key Performance Indicator (KPI) yang disepakati</b> The agreed Key Performance Indicators (KPI)</p>	<p><b>Pemenuhan atau peningkatan kompetensi</b> Fulfillment or improvement of competencies</p>	<p><b>Penerapan nilai-nilai Bank Victoria</b> Implementation of Bank Victoria's values</p>
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### Unsur-unsur kinerja yang dinilai terdiri dari: Elements of the assessed performance consist of:

 <div style="text-align: center; background-color: #800000; color: white; padding: 5px; margin-bottom: 10px;"><b>Result</b></div> <p><b>Menunjukkan pencapaian karyawan atas target (lag measure)</b> Showing employee's achievement of the target (lag measure)</p>	 <div style="text-align: center; background-color: #800000; color: white; padding: 5px; margin-bottom: 10px;"><b>Process</b></div> <p><b>Menunjukkan bagaimana cara mencapai target (lead measure)</b> Showing how to achieve the target (lead measure)</p>
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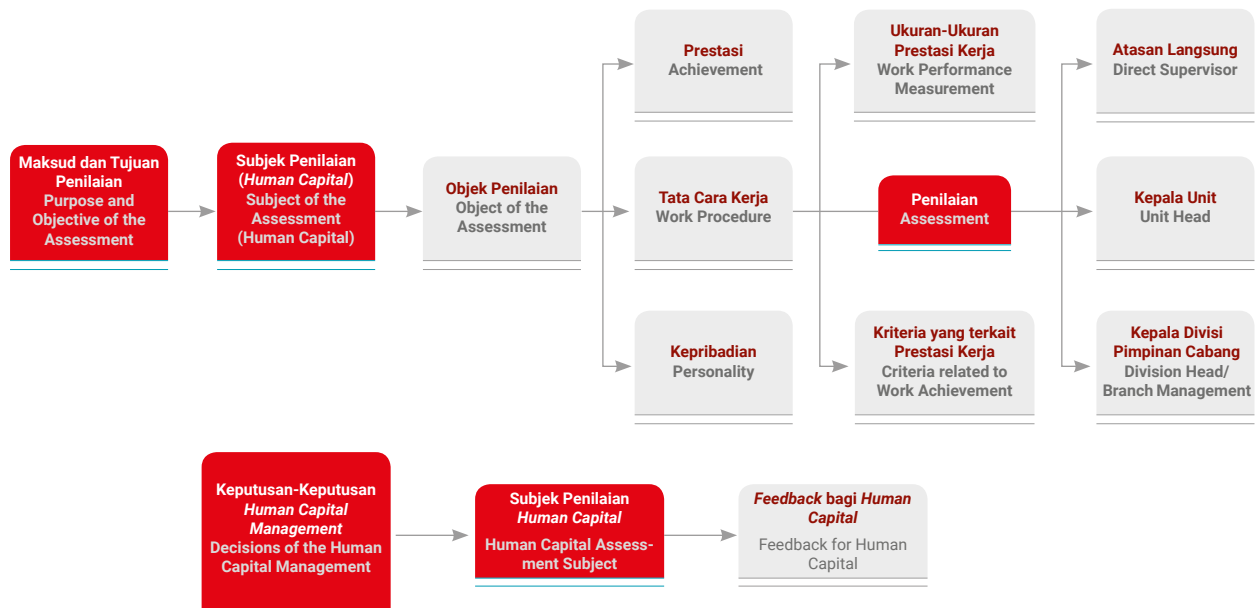
Penerapan penilaian kinerja sesuai dengan KPI berdasarkan sistem *Balanced Scorecard*, yang merupakan suatu sistem pengukuran kinerja yang berfokus pada aspek keuangan dan non-keuangan. Hal tersebut dilakukan dengan mempertimbangkan 4 (empat) perspektif, yang diharapkan dapat membantu Bank untuk terus mencapai visi serta strategi bisnis ke depan, yaitu:

Implementation of performance assessment according to KPI is based on the *Balanced Scorecard* system, which is a performance measurement system that focuses on financial and non-financial aspects. This is conducted by considering 4 (four) perspectives that are expected to support the Bank to keep achieving its vision and business strategy to the future, which are:

 <div style="background-color: #ccc; padding: 10px; margin-top: 10px;"> <p><b>Keuangan</b> Finance</p> </div>	 <div style="background-color: #ccc; padding: 10px; margin-top: 10px;"> <p><b>Nasabah</b> Customers</p> </div>	 <div style="background-color: #ccc; padding: 10px; margin-top: 10px;"> <p><b>Pembelajaran dan pertumbuhan karyawan</b> Employees' learning and growth</p> </div>	 <div style="background-color: #ccc; padding: 10px; margin-top: 10px;"> <p><b>Proses bisnis internal</b> Internal business process</p> </div>
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Penilaian kinerja karyawan dilaksanakan bertujuan untuk mengetahui sejauh mana kinerja dari setiap HC, serta mengevaluasi efektivitas sistem-sistem yang berjalan/berlaku di Bank Victoria. Melalui penilaian kinerja yang dilaksanakan sebanyak 2 (dua) kali dalam 1 (satu) tahun, HC diharapkan dapat menjalankan tugasnya secara optimal, meningkatkan loyalitas, serta menggerakkan iklim kerja yang terbuka, positif, dan progresif.

The employee's performance assessment is intended to determine the extent of each HC's performance, and to evaluate the effectiveness of existing/prevailing systems in Bank Victoria. Through the performance assessment which is carried out twice in 1 (one) year, HC is expected to be able to perform the duties optimally, enhance loyalty, and encourage an open, positive, and progressive work climate.



Hasil penilaian kinerja HC selanjutnya akan menjadi bahan pertimbangan untuk menetapkan kenaikan remunerasi dan bonus tahunan. Hasil penilaian kinerja juga akan digunakan sebagai dasar pemberian penghargaan kepada karyawan, baik yang bersifat finansial maupun non-finansial, yang disesuaikan dengan kemampuan Bank setiap tahunnya.

The HC's performance assessment results thereafter will become a consideration in determining remuneration and annual bonus increment. The performance assessment results will also be used as the basis of rewards for employees, both financial and non-financial, adjusted to the Bank's ability every year.

## Pengembangan Karier Human Capital

Dalam mengimplementasikan program pengembangan karier, Bank Victoria selalu berlandaskan pada prinsip *fair opportunity*, yaitu adanya kesempatan yang sama bagi setiap karyawan untuk tumbuh dan berkembang dengan tetap memperhatikan factor kebutuhan Bank, kemampuan, tingkat kinerja, *value rating*, kelompok talenta (*talent classification*), ketersediaan jabatan, serta persyaratan lainnya.

## Human Capital Career Development

In implementing its career development program, Bank Victoria always refers to the principle of fair opportunity, which means the availability of equal opportunities for every employee to grow and develop by considering factors such as the Bank's needs, ability, performance level, value rating, talent classification, position availability, and other requirements.

**Tujuan Pengembangan Karier**  
Career Development Objective



1. Membantu pencapaian tujuan individu dan Bank sebagai hubungan timbal balik yang bermanfaat bagi kesejahteraan HC dan tujuan Bank.

Assisting the achievement of individual and Bank objectives as a beneficial mutual relationship for HC welfare and Bank's objectives.

2. Menunjukkan hubungan kesejahteraan HC, dimana peningkatan kesejahteraan diharapkan dapat meningkatkan loyalitas.

Demonstrating the connection of HC welfare, where improvement of welfare is expected to increase loyalty.

3. Membantu HC memahami potensi dan keahliannya, sehingga mampu menciptakan iklim kerja positif.

Assisting HC in understanding the potential and expertise, so that HC can create a positive work environment.

4. Mengurangi perputaran karyawan, dimana rendahnya tingkat perputaran karyawan dapat menghemat biaya tenaga kerja, khususnya biaya untuk mendidik karyawan baru.

Reducing employees' turnover, in which a low employees' turnover rate can save manpower costs, especially the cost of training new employees.

Secara luas, pengembangan karier tidak hanya dari sisi promosi, tetapi juga dari sisi peningkatan kapabilitas, perluasan kewenangan, pengembangan individu dan peningkatan remunerasi. Oleh karena itu, Bank Victoria mengembangkan karier HC dengan mengacu pada *Prudential Career Management Guideline*.

**Manfaat Pengembangan Karier**  
Career Development Benefit



1. Sebagai media dalam upaya menyediakan HC yang sesuai dengan strategi Bank.

As a media in the effort to provide HC that is in accordance with the Bank's strategies.

2. Mengidentifikasi karyawan yang potensial.

Identifying potential employees.

3. Menciptakan iklim kompetisi yang sehat.

Creating a healthy competition climate.

4. Menyediakan standar kompetensi HC yang dibutuhkan pada setiap jabatan di Bank.

Providing HC competence standard required for every position in the Bank.

5. Mengatur agar Bank memiliki dan mengaplikasikan sistem pengembangan karier yang jelas dan terukur.

Arranging so that the Bank has and applies a defined and measured career development system.

Extensively, career development will be viewed not only from the promotion side, but also from the sides of capability improvement, authority expansion, individual development, and remuneration increase. Therefore, Bank Victoria develops HC career by referring to the *Prudential Career Management Guidelines*.



- 1 HC yang akan diusulkan untuk dikembangkan kariernya, harus diyakini telah memberikan kontribusi kinerja yang konsisten dan berkesinambungan.  
HC whose career is proposed to be developed must be considered of having given consistent and continuous performance contribution
- 2 HC tersebut harus diberikan perluasan tugas/fungsi/kewenangan. Proses perluasan ini dapat dikompensasikan melalui kenaikan gaji yang memadai dengan memperhatikan *range* gaji dan anggaran biaya tenaga kerja yang tersedia.  
The HC must be given duties/function/authority expansion. This expansion process can be compensated by adequate salary increment with due observance of the salary range and manpower cost budget availability.
- 3 HC yang telah berhasil dalam tugas barunya dapat dipindahkan ke bidang lain dalam rangka memperluas pengetahuannya.  
HC who are successful in their new assignments can be rotated to other field in order to gain broader knowledge.

Sepanjang tahun 2021, Bank Victoria telah melaksanakan pengembangan karier terhadap 21 karyawan dengan penempatan di berbagai posisi sebagai berikut.

Throughout 2021, Bank Victoria conducted career development on 21 employees with various placements, as listed below.

Pengembangan Karier Career Development	Jumlah Karyawan Number of Employee (orang / people)
Promosi kepada jabatan yang lebih tinggi Promotion to a higher position	21
Mutasi pada jenjang yang selevel Transfer at the same level	150

## Human Capital Engagement

*Human Capital Engagement* merupakan parameter yang digunakan untuk mengukur tingkat keterikatan emosional karyawan terhadap Bank. Bank Victoria senantiasa memperhatikan kesejahteraan seluruh karyawan agar dapat saling bersinergi demi terciptanya produktivitas kerja yang optimal. Beberapa cara yang dilakukan Bank untuk meningkatkan *engagement* karyawan adalah dengan memberikan kesempatan mengikuti pendidikan dan pelatihan untuk meningkatkan pengetahuan serta memberikan kesempatan bagi HC terbaik untuk mengembangkan karier melalui promosi, *job rotation*, *job enrichment*, *job enlargement* atau tantangan lain, seperti terlibat dalam suatu kegiatan yang diselenggarakan Bank.

Bank juga melakukan penilaian kinerja atas pencapaian KPI berdasarkan sistem *Balanced Scorecard* yang direncanakan dan ditetapkan mulai dari level perusahaan, tingkat divisi/tim sampai dengan tingkat individu. Selanjutnya, Bank melakukan pemantauan atas keseluruhan capaian kinerja masing-masing individu maupun grup/kelompok berdasarkan hasil penilaian. Pemantauan dilaksanakan melalui *coaching*, *counseling*, dan *controlling*.

## Human Capital Engagement

Human Capital Engagement is one of the parameters used to measure employees' emotional engagement to the Bank. Bank Victoria always pays attention to the welfare of all employees so that they can work together to create optimal work productivity. Several methods applied by the Bank to increase employees' engagement are by giving the opportunity to participate in education and training programs to improve their knowledge as well as giving the opportunity to the best HC to develop their career through promotion, job rotation, job enrichment, job enlargement, or other challenges, such as engaging in an activity organized by the Bank.

The Bank also conducts performance assessment of KPI achievements based on *Balanced Scorecard* system that are planned and set from the Company level, division/ team level, to individual level. Based on the assessment results, the Bank monitors the overall performance achievements of each individual employee and group/team. The monitoring is conducted through *coaching*, *counseling*, and *controlling*.



Hasil penilaian dan pemantauan kinerja kemudian digunakan untuk beberapa tujuan, yaitu:

1. Menjadi umpan balik bagi pengembangan kompetensi SDM bersangkutan;
2. Memberikan penghargaan bagi yang memiliki kinerja mencapai atau melebihi target yang disepakati dalam KPI; dan
3. Menentukan program pembinaan bagi yang kurang atau tidak dapat mencapai ukuran kinerja yang ditetapkan.

HC yang berprestasi dalam mendukung pencapaian target akan mendapatkan penghargaan. Berikut informasi pemberian penghargaan kepada HC dan kantor cabang Bank pada tahun 2021.

Jenis Penghargaan Type of Rewards	Penerima Penghargaan Recipients of Rewards
Service Excellent Terbaik / Best Excellent Service	Bekti Setiadi – IT Division

The performance assessment and monitoring results will then be used for several purposes:

1. Becoming the feedback for the competency development of the concerned HR;
2. Giving appreciation to those whose performance meets or exceeds the targets agreed in their KPI; and
3. Determining the coaching program for those whose performance is less than or does not meet the set target.

HC who gives high contribution in achieving target will be rewarded. The following is information of rewards given to HC and Bank's branch offices in 2021.

Selain itu, HC *Engagement* juga dilakukan melalui penerapan standar remunerasi yang layak dan memenuhi peraturan-peraturan terkait ketenagakerjaan. Penetapan standar remunerasi dilakukan berdasarkan pemeringkatan karyawan dan jenjang jabatan.

In addition, HC *Engagement* is also carried out through the implementation of fair remuneration standard that meets the regulations related to manpower. The remuneration standard will be determined based on the employee's ranking and position level.

### Industrial Relations

Bank Victoria selalu berupaya untuk menciptakan suasana kerja yang terbuka, positif, dan progresif dalam rangka meningkatkan hubungan industrial yang harmonis, dinamis dan adil. Oleh sebab itu, Bank menyusun Peraturan Perusahaan Bank Victoria yang telah dimutakhirkan dan disahkan oleh Kementerian Tenaga Kerja dan Transmigrasi melalui Surat Keputusan Direktur Jenderal Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep.564/PHIJSK-PK/PP/IV/2019 tanggal 16 April 2019 tentang Pengesahan Peraturan Perusahaan PT Bank Victoria International Tbk. Peraturan ini dimutakhirkan secara berkala sesuai dengan perubahan peraturan dan perkembangan industri perbankan di tanah air. Hingga akhir tahun 2021, Bank Victoria belum memiliki serikat pekerja. Meskipun demikian, Bank berusaha untuk membangun dan memelihara hubungan industrial yang baik dan harmonis sebagai sebuah sistem hubungan sistem kerja yang sehat antara karyawan dengan manajemen Bank.

### Industrial Relations

Bank Victoria seeks to establish an open, positive, and progressive work atmosphere, in order to create a harmonious, dynamic, and fair industrial relations. As such, the Bank prepared Bank Victoria's Company Regulations, which was updated and validated by the Ministry of Manpower and Transmigration through the Directorate General of Industrial Relations Development and Labor Social Security Decision No. Kep.564/PHIJSK-PK/PP/IV/2019 dated 16 April 2019 on the Approval of PT Bank victoria International Tbk's Company Regulations. The Company Regulations are updated periodically in line with any amendments to the regulations and development of the national banking industry. As of the end of 2021, Bank Victoria does not have a trade union. Nevertheless, the Bank strives to build and maintain good and harmonious industrial relations as a system of sound working relations between employees and the Bank's management.

### Internalisasi Budaya Perusahaan *Human Capital*

Budaya Perusahaan merupakan nilai budaya Bank Victoria yang dihidupi dan dijalankan secara konsisten oleh seluruh jajaran HC Bank. Budaya Perusahaan ditujukan untuk menciptakan transformasi budaya kerja yang lebih profesional di Bank Victoria guna mendukung perbaikan proses dan kinerja bisnis Bank. Transformasi tersebut dimulai dari tahap *awarenes, engagement, acceptance, dan ownership*.

### Internalization of Human Capital Corporate Culture

Corporate Culture is Bank Victoria's cultural value that is enlivened and implemented consistently by all of the Bank's HC. Corporate Culture is intended to create a more professional work culture transformation in Bank Victoria as to support the improvement of the Bank's business process and performance. The transformation starts from awareness, engagement, acceptance, and ownership stages.

Guna mewujudkan transformasi budaya kerja, Bank menetapkan program kerja yang dapat memperkuat budaya kerja yang

In order to manifest the work culture transformation, the Bank established a work program that can strengthen the work

berorientasi pada *intrapreneurship* (pelayanan dan penjualan), kinerja, inovasi dan efisiensi. Program kerja tersebut antara lain meliputi sosialisasi dan komunikasi nilai Budaya Perusahaan, internalisasi nilai budaya perusahaan, penyelarasan sistem organisasi dan HC, serta pelaksanaan program *recognition*. Program tersebut dilaksanakan secara konsisten sebagai bagian yang tidak terpisahkan dari kegiatan operasional Bank.

culture that is oriented on intrapreneurship (services and sales), performance, innovation, and efficiency. This work program among others includes dissemination and communication of Corporate Culture values, internalization of corporate cultural values, alignment of organizational and HC systems, and implementation of recognition programs. The program is implemented consistently as an inseparable part of the Bank's operational activities.

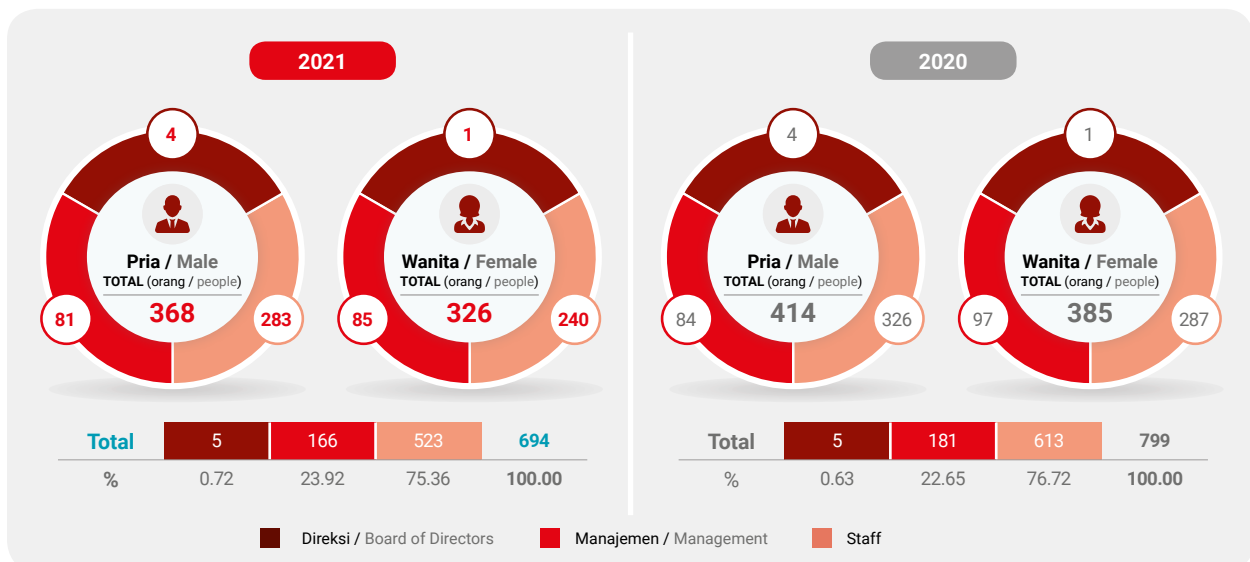
## Profil Human Capital

Pada tahun 2021, total HC Bank Victoria mencapai 694 orang, mengalami penurunan sebesar 13,14% dibandingkan tahun 2020 yang mencapai 799 orang. Hal ini dikarenakan adanya penutupan cabang Bank Victoria.

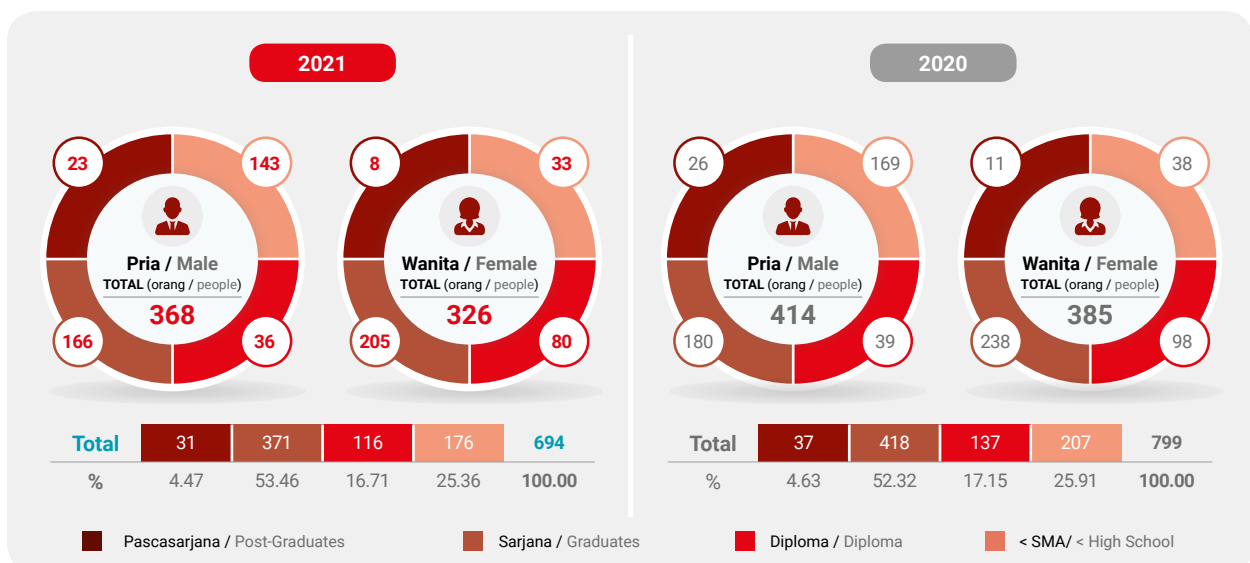
## Human Capital Profile

In 2021, the number of Bank Victoria's HC reached 694 people, a decrease of 13.14% compared to that of 2020 which reached 799 people. This was due to Bank Victoria's branch office closure.

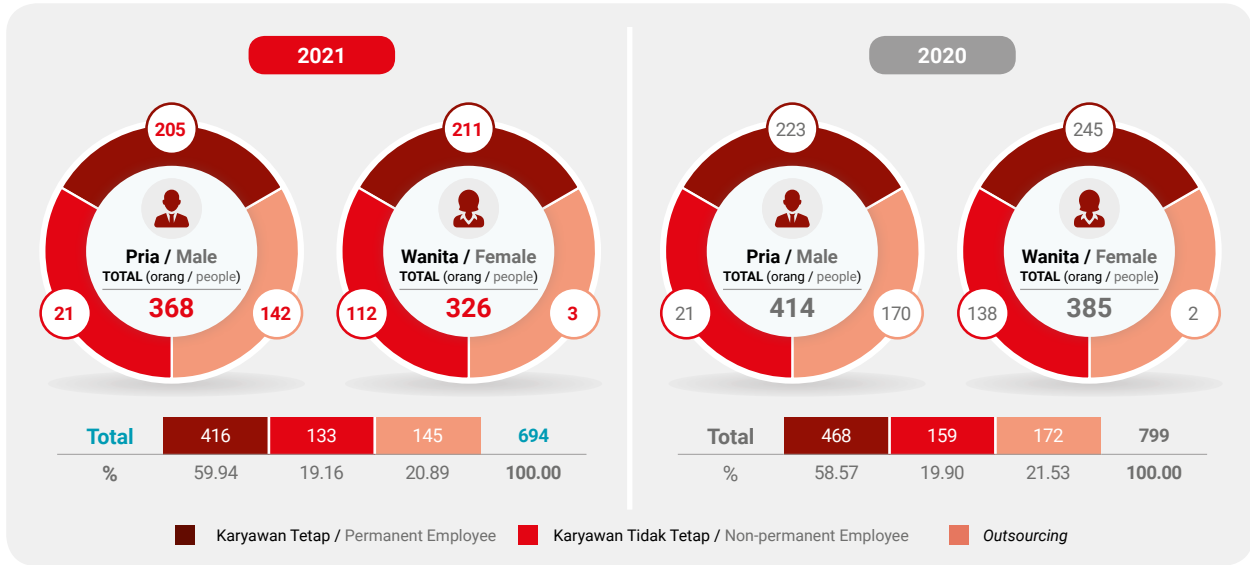
### Jumlah Karyawan berdasarkan Level Organisasi Total Employees by Organizational Level



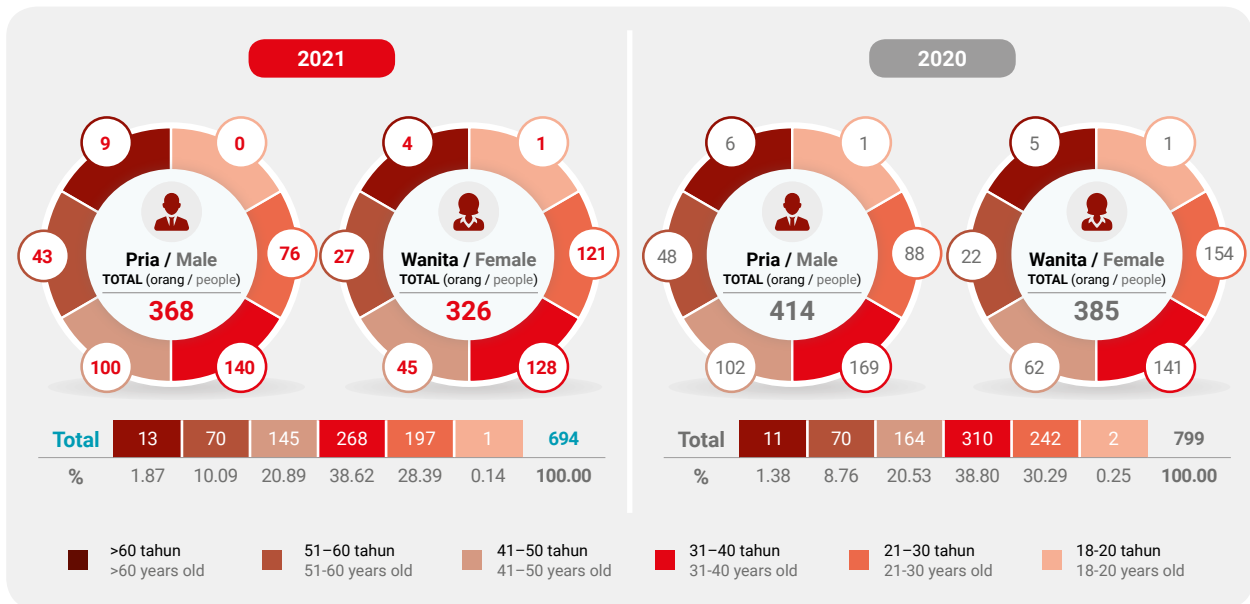
### Jumlah Karyawan berdasarkan Tingkat Pendidikan Total Employees by Educational Level



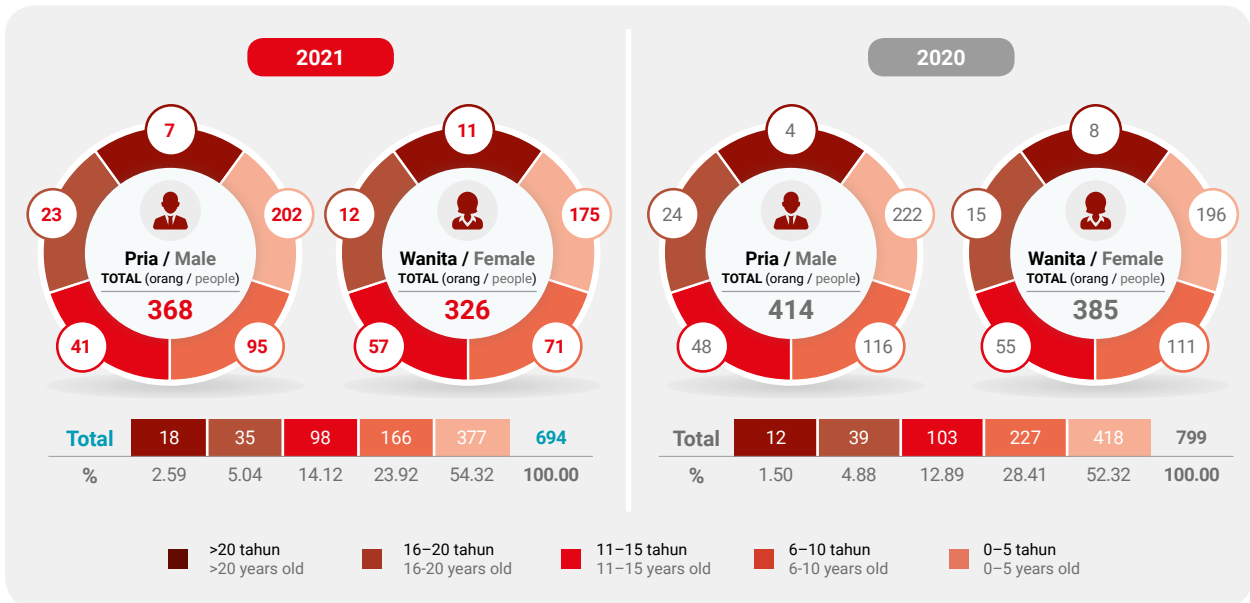
**Jumlah Karyawan berdasarkan Status Karyawan**  
Total Employees by Employment Status



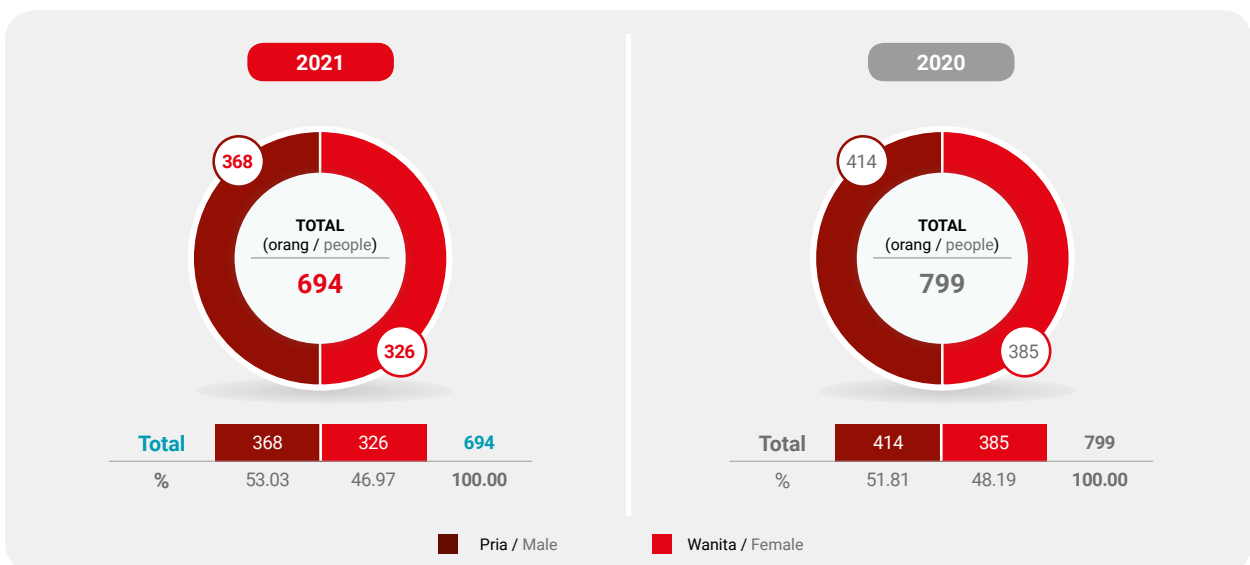
**Jumlah Karyawan berdasarkan Usia**  
Total Employees by Age



**Jumlah Karyawan berdasarkan Masa Kerja**  
Total Employees by Years of Services



**Jumlah Karyawan berdasarkan Jenis Kelamin**  
Total Employees by Gender



## Strategi Pengelolaan *Human Capital* Tahun 2022

Bank Victoria telah menyusun rencana kerja pengelolaan HC guna memastikan kesinambungan setiap tahunnya. Rencana kerja pengelolaan HC yang akan dilaksanakan pada tahun 2022 sebagai berikut.

## Human Capital Management Strategy in 2022

Bank Victoria has developed HC management work plan in order to ensure its annual sustainability. The HC management work plan to be implemented in 2022 is as follows.

Area Utama Key Areas	Strategi Strategies	Rencana Tindakan Action Plans
Ketentuan dan Kebijakan Bidang HCM HCM Provisions and Policies	Pengkinian dan penyempurnaan ketentuan dan kebijakan bidang <i>Human Capital Management</i> . Updating and refining Human Capital Management provisions and policies.	<ol style="list-style-type: none"> <li>Penyempurnaan penyusunan KPI karyawan menggunakan <i>balance score card</i> tahun 2021;</li> <li>Pengkinian dan penyempurnaan sistem prosedur bidang HCM; dan</li> <li>Pembaruan dan perpanjangan Peraturan Perusahaan Online - pppkb.kemnaker.go.id.</li> </ol> <ol style="list-style-type: none"> <li>Improving the preparation of employees' KPI by using balance score card in 2021;</li> <li>Updating and refining HCM system and procedure; and</li> <li>Updating and extending the Online Company Regulations - pppkb.kemnaker.go.id.</li> </ol>
Pengembangan Karyawan Employee Development	Mengoptimalkan pendidikan dan pelatihan termasuk juga proses penilaian dan pengelolaan <i>talent</i> karyawan. Optimizing education and training including the process of assessing and managing employee talent.	<ol style="list-style-type: none"> <li>Victoria Corporate University:                             <ul style="list-style-type: none"> <li>Penyusunan kurikulum, silabus, dan modul bidang Kredit;</li> <li>Penyusunan program <i>talent pool</i>;</li> <li>Penyusunan program <i>assessment</i>; dan</li> <li>Pengembangan program <i>online learning</i>, <i>mobile learning</i>, dan <i>learning management system</i> (LMS).</li> </ul> </li> <li>Penyelenggaraan program ujian sertifikasi:                             <ul style="list-style-type: none"> <li>Sertifikasi Manajemen Risiko;</li> <li>Sertifikasi <i>Dealer Treasury</i>;</li> <li>Sertifikasi Audit; dan</li> <li>Sertifikasi Kepatuhan.</li> </ul> </li> <li>Penyelenggaraan program <i>training refreshment</i>;</li> <li>Penyelenggaraan program pelatihan internal dan eksternal sesuai dengan kebutuhan divisi terkait; dan</li> <li>Sosialisasi peraturan dan ketentuan perbankan serta sosialisasi kebijakan internal.</li> </ol> <ol style="list-style-type: none"> <li>Victoria Corporate University:                             <ul style="list-style-type: none"> <li>Preparing curriculum, syllabus, and loan modules;</li> <li>Preparing talent pool program;</li> <li>Preparing assessment program; and</li> <li>Developing online learning, mobile learning, and learning management system (LMS) programs.</li> </ul> </li> <li>Organizing certification exam program:                             <ul style="list-style-type: none"> <li>Risk Management Certification;</li> <li>Treasury Dealer Certification;</li> <li>Audit Certification; and</li> <li>Compliance Certification.</li> </ul> </li> <li>Conducting refreshment training programs;</li> <li>Conducting internal and external training programs in accordance with the needs of relevant divisions; and</li> <li>Disseminating banking regulations and provisions as well as internal policies.</li> </ol>
Rekrutmen Karyawan Employee Recruitment	Pemenuhan kebutuhan karyawan secara tepat. Meeting employees' needs appropriately.	<ol style="list-style-type: none"> <li>Melakukan pemenuhan kebutuhan karyawan untuk mengisi kekosongan karyawan yang <i>resign</i>; dan</li> <li>Melakukan promosi, rotasi, mutasi, serta pengkinian <i>manpower planning</i>.</li> </ol> <ol style="list-style-type: none"> <li>Meeting employees' needs to fill the vacancy of resigned employees; and</li> <li>Promoting, rotating, transferring, and updating manpower planning.</li> </ol>
Administrasi <i>Services and Payroll</i> Services and Payroll administration	Pemenuhan ketentuan pelaporan dan layanan ketenagakerjaan. Compliance with reporting requirements and employment services.	<ol style="list-style-type: none"> <li>Pelaporan bidang ketenagakerjaan via Aplikasi Pelaporan Online OJK (APOLO);</li> <li>Pelaporan Wajib Laporan Penyelenggaraan Fasilitas Kesejahteraan Peraturan Daerah No. 6 Tahun 2004 Pelaporan Wajib Laporan Ketenagakerjaan <i>Online</i> (Peraturan Menteri Tenaga Kerja No. 3 Tahun 2019); dan</li> <li>Pembuatan Surat Pemberitahuan Tahunan Pasal 21 Karyawan.</li> </ol> <ol style="list-style-type: none"> <li>Reporting on manpower via OJK Online Reporting Application (APOLO);</li> <li>Mandatory Report on the Implementation of Welfare Facilities, Regional Regulation No. 6 of 2004 on Online Mandatory Report on Manpower (Minister of Manpower Regulation No. 3 of 2019); and</li> <li>Preparing Annual Tax Return Article 21 Employees.</li> </ol>
Office Equipment/System	Pengkinian dan penyempurnaan sistem informasi HR. Updating and refining HR information system.	Penyusunan, pengadaan, dan implementasi sistem <i>online</i> HRIS secara bertahap. Preparing, procuring, and implementing online HRIS system in stages.

## Teknologi Informasi Information Technology

Mengingat pentingnya peranan Teknologi Informasi (TI) dalam kelancaran kegiatan operasional, maka Bank terus berinovasi dan mengembangkan sistem TI yang sesuai dengan kebutuhan bisnis yang dinamis. Oleh karena itu, Bank Victoria terus meningkatkan dan mengoptimalkan sarana dan prasarana TI secara berkala, khususnya keamanan penggunaan TI. Melalui layanan berbasis TI, Bank berharap mampu meningkatkan dan memudahkan pelayanan kepada nasabah melalui otomatisasi proses bisnis, efisiensi proses, dan inovasi produk. Hal ini menjadi bagian dari komitmen dan semangat Bank dalam menyambut peningkatan status dari “konvensional” menjadi “bank layanan digital”.

### Dasar Penerapan Teknologi Informasi

Dasar penerapan TI Bank Victoria mengacu kepada Peraturan Otoritas Jasa Keuangan No. 38/POJK.03/2016 tentang Penerapan Manajemen Risiko dalam Teknologi Informasi oleh Bank Umum. Peraturan tersebut memuat beberapa aturan terkait penerapan TI pada Bank yang diuraikan sebagai berikut.

1. Bank wajib memiliki Komite Pengarah Teknologi Informasi (*Information Technology Steering Committee*);
2. Komite Pengarah Teknologi Informasi bertanggung jawab memberikan rekomendasi kepada Direksi, paling sedikit terkait dengan:
  - a. Rencana strategis TI yang sejalan dengan rencana strategis kegiatan usaha Bank;
  - b. Perumusan kebijakan, standar, dan prosedur TI yang utama;
  - c. Kesesuaian antara proyek TI yang disetujui dengan rencana strategis TI;
  - d. Kesesuaian antara pelaksanaan proyek TI dengan rencana proyek yang disepakati (*project charter*);
  - e. Kesesuaian antara TI dengan kebutuhan sistem informasi manajemen, serta kebutuhan kegiatan usaha Bank;
  - f. Efektivitas langkah-langkah dalam meminimalkan risiko atas investasi Bank pada sektor TI agar memberikan kontribusi terhadap pencapaian tujuan bisnis Bank;
  - g. Pemantauan atas kinerja TI dan upaya peningkatan kinerja TI;
  - h. Upaya penyelesaian berbagai masalah terkait TI yang tidak dapat diselesaikan oleh satuan kerja pengguna dan penyelenggara TI secara efektif, efisien, dan tepat waktu; serta
  - i. Kecukupan dan alokasi sumber daya yang dimiliki Bank.

Considering that Information Technology (IT) plays important role in smooth operational activities, the Bank continues to innovate and develop the IT system, aligned with the dynamic business requirements. As such, Bank Victoria continues to improve and optimize IT facilities and infrastructures periodically, in particular the safe use of IT. Through IT-based services, the Bank expects to be able to improve and facilitate convenient services to the customers through the automation of business process, process efficiency, and product innovation. This becomes part of the Bank's commitment and spirit in welcoming the change in status from “conventional” to “a digital service bank”.

### Basis of Information Technology Implementation

The basis for Bank Victoria's IT implementation refers to Financial Services Authority Regulation No. 38/POJK.03/2016 on Implementation of Risk Management in Information Technology for Commercial Banks. The regulation sets out several rules relating to IT application at the Bank as listed out below.

1. The Bank must have an Information Technology Steering Committee;
2. The Information Technology Steering Committee is responsible for providing recommendations to the Board of Directors, at least related to:
  - a. IT strategic plan in line with the strategic plan of the Bank's business activities;
  - b. Formulation of key IT policies, standards, and procedures;
  - c. Conformity between the approved IT projects and IT strategic plans;
  - d. Conformity between the implementation of IT projects and agreed project plans (*project charter*);
  - e. Conformity of IT between the needs of management information systems and the needs of the Bank's business activities;
  - f. The effectiveness of measures taken to minimize risks on the Bank's investment in IT sector in order to contribute to the achievement of the Bank's business objectives;
  - g. Monitoring of IT performance and efforts to improve IT performance;
  - h. Efforts to resolve various IT-related problems that cannot be resolved by IT users and providers effectively, efficiently, and on time; and
  - i. Adequacy and allocation of resources owned by the Bank.

3. Bank wajib memiliki dan menerapkan kebijakan, standar, dan prosedur penggunaan TI secara konsisten dan berkesinambungan;
4. Kebijakan, standar, dan prosedur penggunaan TI paling sedikit meliputi aspek:
  - a. Manajemen;
  - b. Pengembangan dan pengadaan;
  - c. Operasional TI;
  - d. Jaringan komunikasi;
  - e. Pengamanan informasi;
  - f. Rencana pemulihan bencana;
  - g. Layanan perbankan elektronik;
  - h. Penggunaan pihak penyedia jasa TI; dan
  - i. Penyediaan jasa TI oleh Bank.

## Roadmap Teknologi Informasi

Bank secara konsisten terus berupaya berinovasi dalam mengembangkan sistem TI yang sesuai dengan kebutuhan bisnis yang dinamis mengingat pentingnya peranan TI dalam kelancaran kegiatan operasional. Upaya tersebut diawali dengan penyusunan *roadmap* pengembangan TI yang disesuaikan dengan rencana jangka menengah dan jangka panjang oleh Bank Victoria.

### Re-engineering Proses Kerja

1. Proses kerja operasional TI dilakukan secara otomatisasi untuk membuat proses semakin efektif dan efisien sekaligus menjaga kontrol risiko di dalam Proses. Tinjauan terhadap perbaikan proses selalu dilakukan secara berkelanjutan;
2. Kualitas administrasi dan percepatan proses dapat diwujudkan baik dari sisi administrasi kredit, operasional, serta pada teknologi; dan
3. Transaksi yang semakin kompleks dan meningkat jumlahnya dapat dilaksanakan secara tepat waktu, *zero defect*, memberikan kepuasan kepada nasabah, serta menjaga kontrol risiko.

### Memperluas Peran Aktif dari IT

1. Data *corebanking* dan *non-corebanking* dapat diolah dan dikirim kepada berbagai unit kerja yang membutuhkan dalam bentuk laporan yang tepat dan akurat sehingga proses pengambilan keputusan bisnis lebih efektif; dan
2. Dapat mengikuti perkembangan arah bisnis yang lebih fokus ke retail, SME, *commercial* sehingga dapat sejajar dengan bank pesaing.

## Information Technology Roadmap

The Bank consistently strives to innovate in developing IT systems that are in line with the dynamic business needs considering IT's important role in the smooth running of operational activities. The efforts begin with the preparation of an IT development roadmap tailored to Bank Victoria's medium-term and long-term plans.

### Re-engineering of Work Process

1. IT operational work process is carried automatically to make the process more effective and efficient while maintaining risk control in the process. Review of process improvement is always carried out on an ongoing basis;
2. The quality of administration and acceleration of the process can be realized in terms of credit, operations, and information technology; and
3. Transactions that are increasingly complex and increasing in number can be delivered in a timely manner, zero defect, and provide satisfaction to customers, as well as maintain risk control.

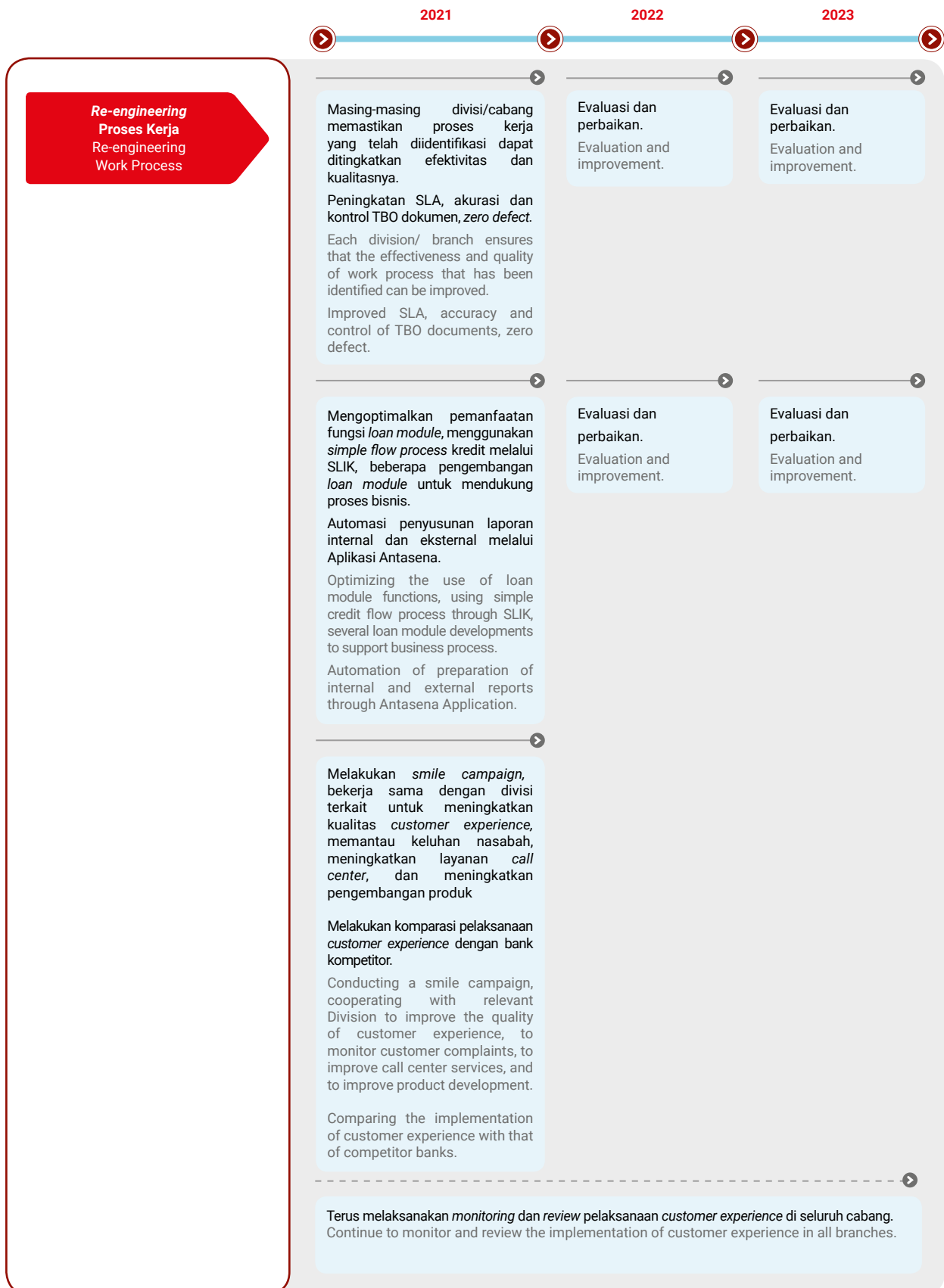
### Expanding IT's Active Roles

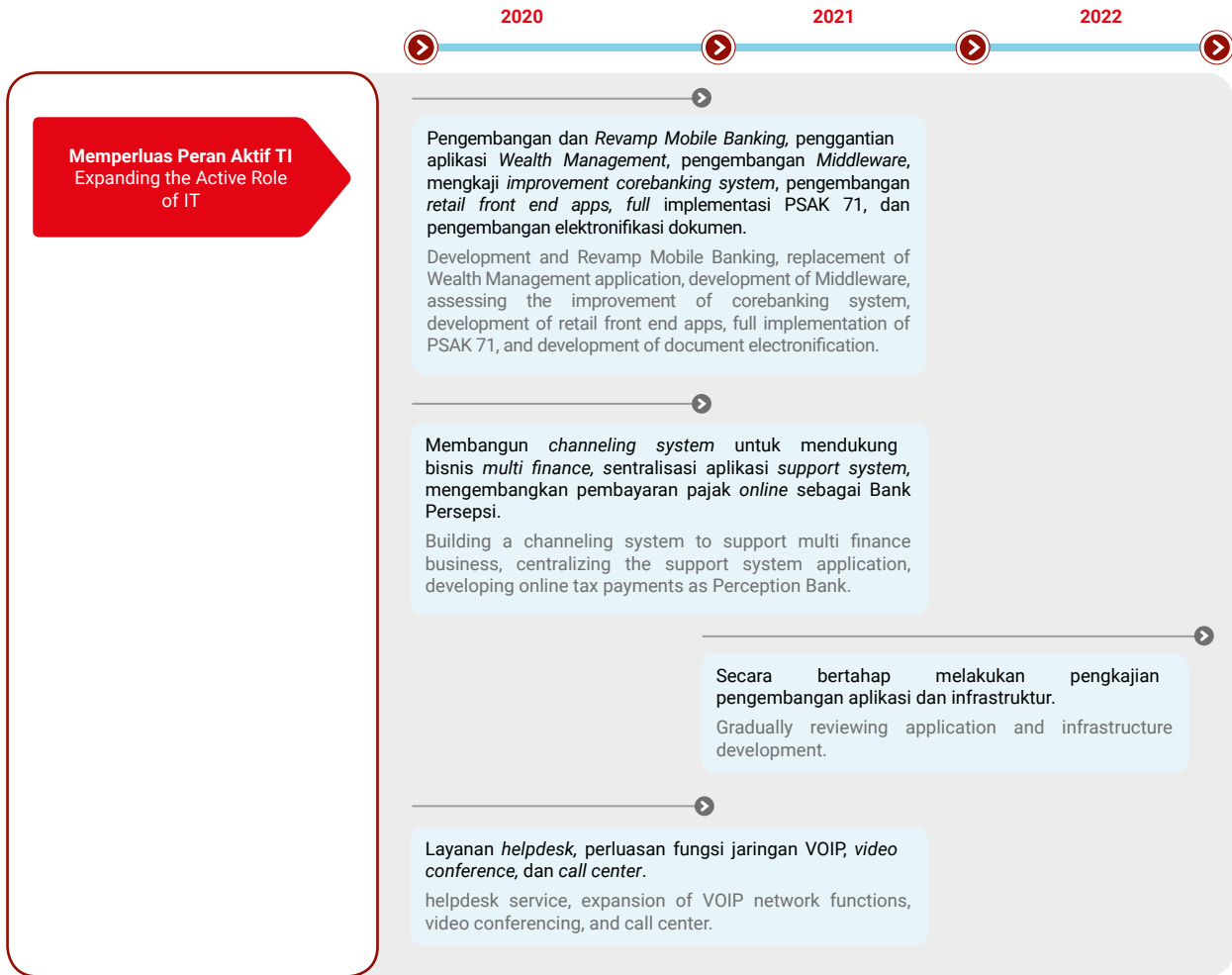
1. Corebanking and non-corebanking data can be processed and distributed to various work units that need it in the form of proper and accurate reports so that the business decision making process is more effective; and
2. Able to follow the development of business directions that are more focused on retail, SME, and commercial in order to be in line with the competing banks.



Berikut skema penjabaran *roadmap* pengembangan TI Bank Victoria.

The following is an explanation scheme regarding Bank Victoria's IT development roadmap.





## Struktur Pengelola Teknologi Informasi

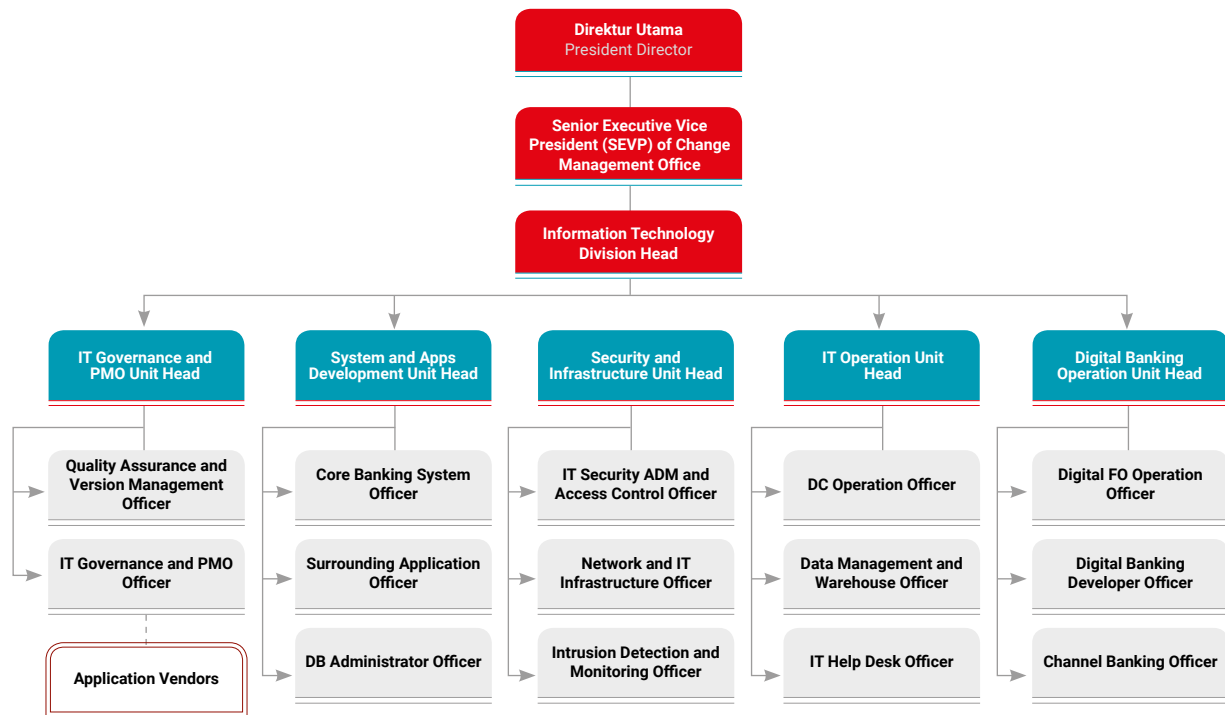
Berdasarkan Surat Keputusan Direksi No. 023/SKDIR/11/21 tentang Struktur Organisasi, penanggung jawab pengelolaan TI di Bank Victoria adalah Divisi *Information Technology* yang dipantau oleh Komite Pengarah Teknologi Informasi. Divisi ini bertanggung jawab kepada Direktur Utama untuk membantu Bank dalam hal-hal yang berkaitan dengan aspek TI sehingga dapat memberikan akses data perbankan yang *online/real time* bagi Bank dan nasabah, sesuai dengan hak dan kewajibannya masing-masing.

## Information Technology Manager Structure

Based on the Board of Directors' Decision Letter No. 023/SKDIR/11/21 on Organizational Structure, the department in charge of managing IT in Bank Victoria is the Information Technology Division, monitored by the Information Technology Steering Committee. This Division reports to the President Director to assist the Bank related to IT aspects so to enable online/real time banking data access for the Bank and for the Customers, according to their respective rights and obligations.

Adapun struktur Divisi *Information Technology* Bank Victoria, yakni:

The structure of Bank Victoria's *Information Technology* Division is as shown below:



Fungsi dan ruang lingkup tugas terkait TI dari masing-masing Unit Kerja pada Divisi *Information Technology* diuraikan sebagai berikut.

The function and scope of duties related to IT from respective Work Units in the *Information Technology* Division are as described below.

Fungsi Function	Uraian Tugas Description of Duties
<b>IT Development and Application</b>	
<ol style="list-style-type: none"> <li>1. Mengkoordinasikan TI dengan user dalam hal kebutuhan TI dari user (sisi software, hardware maupun jaringan komunikasi);</li> <li>2. Melakukan pemantauan terhadap proyek yang dikembangkan; dan</li> <li>3. Membantu pengguna untuk menyusun Business Requirement untuk kebutuhan aplikasi.</li> </ol>	<ol style="list-style-type: none"> <li>1. Melakukan <i>monitoring</i> terhadap proses <i>user acceptance test</i> (UAT);</li> <li>2. Memberikan persetujuan/konfirmasi mengenai kesiapan aplikasi dalam penyerahterimaan kepada user;</li> <li>3. Melakukan <i>pitching</i> teknologi dan harga/biaya atas proyek yang akan diimplementasikan;</li> <li>4. Memastikan adanya <i>application security</i>, <i>user access rights</i>, dan <i>user access control</i> yang memadai;</li> <li>5. Melakukan <i>post implementation review</i> (PIR) terhadap aplikasi yang telah diimplementasikan;</li> <li>6. Membuat <i>Business Analysis</i> untuk aplikasi yang sedang dikembangkan yaitu <i>Funding</i>, <i>Lending</i>, dan <i>MIS</i>;</li> <li>7. Menjembatani kebutuhan <i>end user</i> dengan Unit Kerja IT (Pengembangan);</li> <li>8. Memastikan bahwa <i>project cost</i> mengikuti ketentuan dan peraturan yang berlaku;</li> <li>9. Membuat dokumen <i>scope of work</i> (SOW) atau <i>functional specification design</i> (FSD) atas proyek pengembangan aplikasi;</li> <li>10. Membantu memantau operasional terhadap <i>delivery channel</i> (IB/MB dan ATM);</li> <li>11. Membantu menyusun SOP terhadap kebijakan <i>system development live cycle</i> (SDLC); dan</li> <li>12. Melakukan tugas-tugas lainnya yang diberikan oleh atasan.</li> </ol>
<ol style="list-style-type: none"> <li>1. Coordinating IT with users in terms of users' IT needs (software, hardware, and communication networks);</li> <li>2. Monitoring the project being developed; and</li> <li>3. Helping users to develop Business Requirements for application needs.</li> </ol>	<ol style="list-style-type: none"> <li>1. Monitoring the process of User Acceptance Test (UAT);</li> <li>2. Providing approval/confirmation on the readiness of the application to be handed over to the User;</li> <li>3. Pitching technology and prices/costs of the project to be implemented;</li> <li>4. Ensuring adequate application security, user access rights, and user access control;</li> <li>5. Performing Post Implementation Review (PIR) on applications that have been implemented;</li> <li>6. Creating Business Analysis for applications that are being developed by Funding, Lending, and MIS;</li> <li>7. Bridging End User needs with the IT Work Unit (Development);</li> <li>8. Ensuring that project costs follow the applicable provisions and regulations;</li> <li>9. Creating a scope of work (SOW) document or functional specification design (FSD) for an application development project;</li> <li>10. Assisting operational monitoring on delivery channels (IB/MB and ATM);</li> <li>11. Helping to compile an SOP on system development live cycle (SDLC) policies; and</li> <li>12. Carrying out other tasks given by superiors.</li> </ol>

Fungsi Function	Uraian Tugas Description of Duties
<b>IT Operation</b>	
<p>Mengkoordinir, mengatur, mengamati dan mengawasi secara intensif segala kegiatan di bidang Teknologi Sistem Informasi.</p> <p>Coordinating, regulating, monitoring, and supervising intensively all Information System Technology activities.</p>	<ol style="list-style-type: none"> <li>1. Bidang Infrastruktur               <ol style="list-style-type: none"> <li>a. Bertanggung jawab atas infrastruktur dan jaringan seluruh cabang;</li> <li>b. Menyiapkan <i>hardware</i> untuk setiap pembukaan kantor baru (kantor cabang, kantor cabang pembantu, dan kantor kas);</li> <li>c. Melakukan proses pemeliharaan berkala (<i>maintenance</i>) atas peralatan TI;</li> <li>d. Melakukan koordinasi dengan pihak vendor serta bagian <i>hardware</i> untuk perbaikan atas kerusakan peralatan TI;</li> <li>e. Melakukan koordinasi dengan pihak vendor serta bagian jaringan untuk pihak ketiga atas kerusakan;</li> <li>f. Menyusun <i>technical specification</i> dari <i>hardware</i> dan jaringan untuk secara optimum menjawab kebutuhan bisnis;</li> <li>g. Membuat <i>capacity planning</i> terhadap <i>hardware</i> dan jaringan;</li> <li>h. Membantu dalam perbaikan jaringan apabila diperlukan;</li> <li>i. Melakukan <i>continuous monitoring</i> atas kualitas <i>hardware</i> dan jaringan yang ada serta biaya yang dikeluarkan; dan</li> <li>j. Bertanggung jawab menyiapkan <i>business continuity plan</i> (BCP) atas seluruh jaringan yang ada.</li> </ol> </li> <li>1. Infrastructure Sector               <ol style="list-style-type: none"> <li>a. Responsible for the infrastructure and network of all Branches;</li> <li>b. Setting up hardware for each new office opening (branch offices, sub-branch offices, and cash offices);</li> <li>c. Conducting periodic maintenance processes for IT equipment;</li> <li>d. Coordinating with vendor and Hardware department for IT equipment repairs;</li> <li>e. Coordinating with vendor and network department for third parties for damage repairs;</li> <li>f. Arranging technical specifications of hardware and networks to optimally answer business needs;</li> <li>g. Creating capacity planning for hardware and network;</li> <li>h. Helping in network repair if needed;</li> <li>i. Carrying out continuous monitoring of the existing hardware and network quality and costs incurred; and</li> <li>j. Responsible for preparing business continuity plan (BCP) for all existing networks.</li> </ol> </li> <li>2. Bidang Operation               <ol style="list-style-type: none"> <li>a. Membantu <i>supporting data core</i> untuk kebutuhan <i>MIS business</i>;</li> <li>b. Memantau <i>capacity plan</i> dan kinerja dari <i>server</i>, <i>router</i>, <i>hardware</i> serta jaringan yang ada di dalam <i>data center</i>;</li> <li>c. Bertindak sebagai <i>contact</i> untuk segala masalah terkait <i>hardware</i>, <i>software</i>, dan jaringan yang dialami oleh <i>user</i>;</li> <li>d. Memberikan <i>post-implementation support</i>;</li> <li>e. Bertanggung jawab atas <i>deployment</i> segala macam <i>hardware</i> dan <i>software</i> yang ada di dalam <i>data center</i>;</li> <li>f. Secara berkala melakukan pengawasan <i>back-up</i> terhadap <i>database</i> yang ada di <i>data center</i>;</li> <li>g. Melakukan pengawasan atas akses keluar masuk <i>data center</i>, serta memastikan hanya <i>authorised personnel</i> yang dapat memasuki <i>data center</i>;</li> <li>h. Membantu sebagai <i>user request</i> terkait aplikasi <i>core banking</i> dan melakukan <i>test system core</i>;</li> <li>i. Melakukan manual <i>intervention</i> untuk proses <i>download</i> dan <i>upload</i> data antarsistem yang belum dapat dilakukan secara otomatis;</li> <li>j. Melakukan fungsi <i>database administration</i> pada aplikasi dan <i>user administrator system</i>;</li> <li>k. Membantu <i>solving problem</i> terhadap sistem dan aplikasi pada <i>production</i>; dan</li> <li>l. Sebagai <i>single contact first layer support</i>.</li> </ol> </li> <li>2. Operations Sector               <ol style="list-style-type: none"> <li>a. Helping in supporting core data for MIS business needs;</li> <li>b. Monitoring the capacity plan and performance of servers, routers, hardwares, and networks in the data center;</li> <li>c. Acting as a contact for all problems related to hardware, software, and networks experienced by users;</li> <li>d. Providing post-implementation support;</li> <li>e. Responsible for the deployment of all kinds of hardware and software in the data center;</li> <li>f. Periodically supervising database back-up in the data center;</li> <li>g. Supervising access of entry and exit to and from the data center, and ensuring that only authorized personnel can enter the data center;</li> <li>h. Assisting as user requests related to the core banking applications and performing core system tests;</li> <li>i. Performing manual intervention for the process of downloading and uploading data between systems which cannot be done automatically;</li> <li>j. Performing database administration functions on applications and user administrator system;</li> <li>k. Helping in solving problems on systems and applications in production; and</li> <li>l. As a single contact first layer support.</li> </ol> </li> <li>3. Bidang Security               <ol style="list-style-type: none"> <li>a. Memastikan bahwa <i>data center</i> mematuhi segala ketentuan yang berlaku terkait <i>IT security</i>;</li> <li>b. Melakukan pengawasan atas akses keluar masuk <i>data</i>, serta memastikan hanya <i>authorized personnel</i> dalam aplikasi <i>production</i>;</li> <li>c. Melakukan pemantauan terhadap aplikasi yang berjalan sesuai dengan standarisasi TI;</li> <li>d. Memberikan input/masukan kepada tim operasi dan bisnis untuk perbaikan <i>data</i>;</li> <li>e. Melakukan kaji ulang terhadap perangkat personal komputer atau <i>peripheral</i> lainnya;</li> <li>f. Melakukan fungsi <i>user administrator</i> pada aplikasi;</li> <li>g. Melakukan kaji ulang keamanan terhadap perangkat personal komputer atau <i>peripheral</i> lainnya; serta</li> <li>h. Membuat <i>capacity planning</i> terhadap keamanan <i>software</i>, <i>hardware</i>, serta jaringan.</li> </ol> </li> <li>3. Security Sector               <ol style="list-style-type: none"> <li>a. Ensuring that the data center complies with all applicable provisions related to IT security;</li> <li>b. Supervising access of data entry and exit, and ensuring that only authorized personnel are in the production applications;</li> <li>c. Monitoring the running applications to be in accordance with IT standards;</li> <li>d. Providing input/suggestion to the Operations and Business team for data repairs;</li> <li>e. Reviewing PC devices or other peripherals;</li> <li>f. Performing administrator user functions on the application;</li> <li>g. Performing security review on PC devices or other peripherals; and</li> <li>h. Creating capacity planning on the security of software, hardware, and network.</li> </ol> </li> </ol>

## Tata Kelola Teknologi Informasi

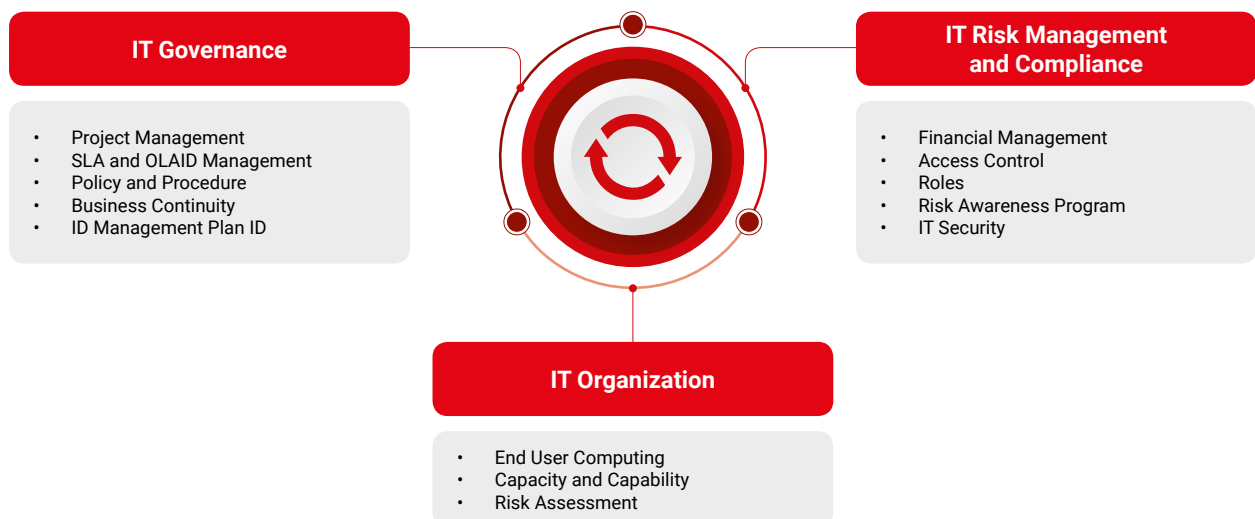
Teknologi informasi (TI) merupakan aset yang berharga bagi Bank dalam meningkatkan efisiensi kegiatan operasional dan mutu pelayanan kepada nasabah. Oleh karena itu, Bank melaksanakan tata kelola TI (*IT Governance*) sebagai suatu hubungan pengelolaan kepemimpinan, struktur organisasi, serta proses-proses yang berkelanjutan untuk memastikan bahwa organisasi TI selaras dengan strategi dan tujuan bisnis Bank. Tata kelola TI dilaksanakan tidak hanya oleh Divisi *Information Technology*, tetapi juga dilakukan oleh seluruh pihak yang menggunakan.

Bank memperhatikan keseimbangan antara aspek *people*, *process*, dan *technology* dalam melaksanakan tata kelola TI. Keseimbangan antar aspek tersebut termuat dalam kebijakan, standar, dan prosedur penggunaan TI, termasuk pedoman manajemen risiko dalam penggunaan TI, sesuai dengan Peraturan Otoritas Jasa Keuangan No. 38/POJK.03/2017 tentang Penerapan Manajemen Risiko dalam Penggunaan Teknologi Informasi oleh Bank Umum.

### Rencana Strategis Tata Kelola Teknologi Informasi

Sebagai bagian dari pelaksanaan tata kelola TI, Bank menyusun Rencana Strategis Teknologi Informasi sesuai arahan Peraturan Otoritas Jasa Keuangan dan *IT Governance Framework* yang dimuat dalam *Control Objectives for Information and Related Technology (COBIT)*, yang menyatakan pentingnya memiliki keselarasan dengan strategi bisnis. Berikut informasi Rencana Strategis Teknologi Informasi Bank Victoria.

### Skema Rencana Strategis Tata Kelola, Risiko, dan Organisasi Teknologi Informasi Strategic Plan Scheme for Governance, Risk, and Information Technology Organization



## Information Technology Governance

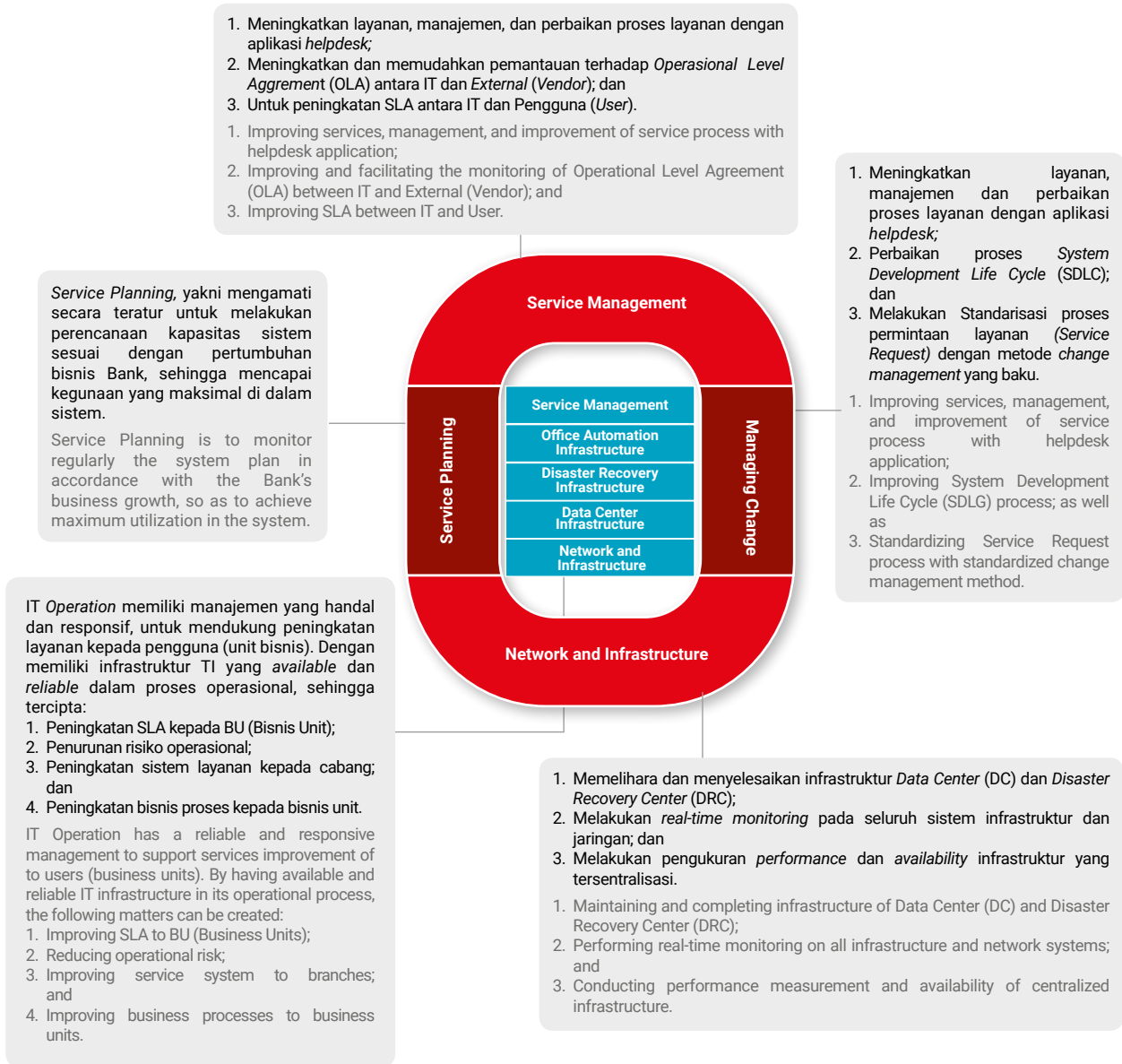
Information technology (IT) is a valuable asset for the Bank in improving the efficiency of operational activities and service quality to customers. Thus, the Bank implements IT Governance as a relationship in leadership management, organizational structure, and sustainable processes to ensure that the IT organizations are aligned with the Bank's business strategies and objectives. The implementation of IT governance is not only the responsibility of Information Technology Division, but also all parties using it.

In implementing IT governance, the Bank considers the balance between People, Process, and Technology aspects. The balance between these aspects is set out in IT policies, standards, and procedures, including risk management guidelines in IT use, in accordance with the Financial Services Authority Regulation No. 38/POJK.03/2017 on Implementation of Risk Management in the Use of Information Technology for Commercial Banks.

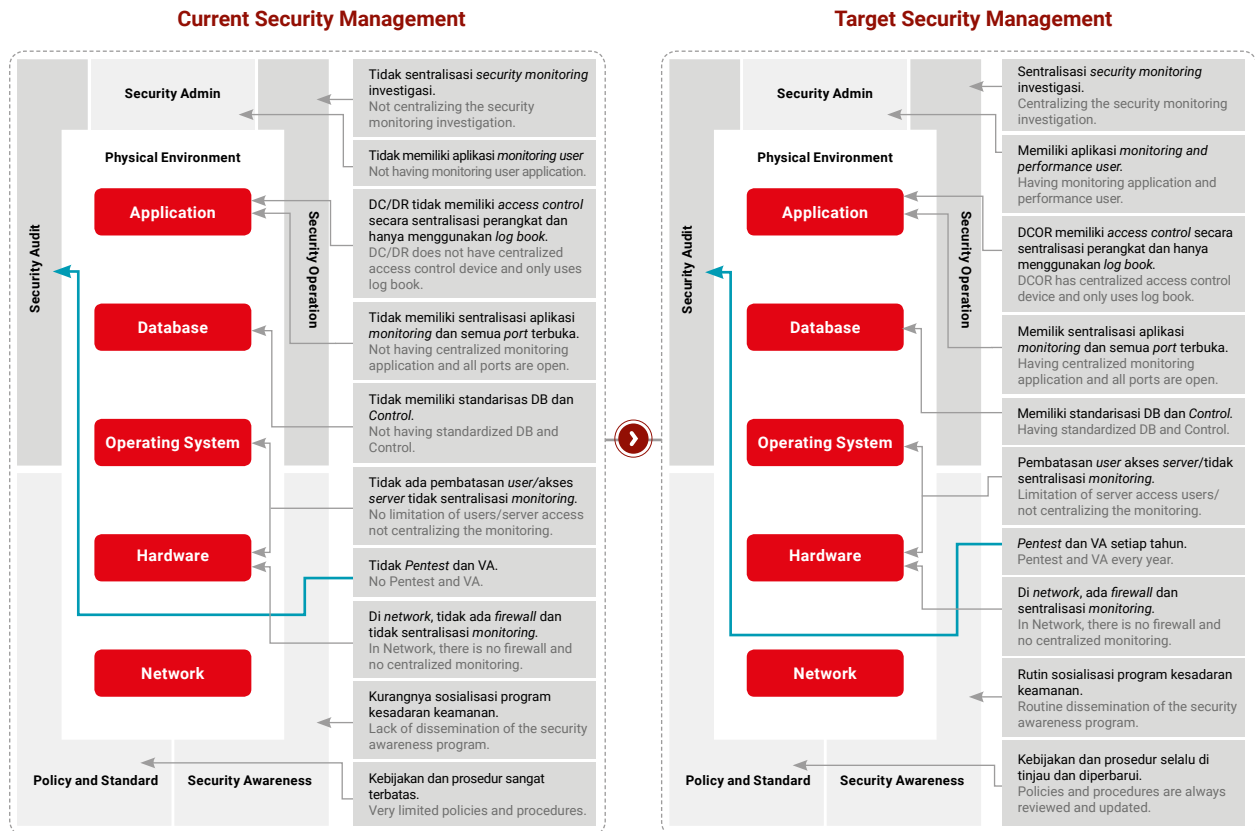
### Strategic Plan for Information Technology Governance

As a part of IT governance implementation, the Bank prepared Information Technology Strategic Plan according to the Financial Services Authority Regulation and IT Governance Framework set out in the Control Objectives for Information and Related Technology (COBIT), which states the importance of alignment with the business strategy. Bank Victoria's Information Technology Strategic Plan is as shown below.

**Skema Rencana Strategis Operasional Teknologi Informasi**  
**Chart of Information Technology's Operational Strategic Plan**



## Skema Rencana Strategis Keamanan Teknologi Informasi Chart of Information Technology's Security Strategic Plan



- > Investasi terbatas untuk infrastruktur keamanan.
- > IT *Security* hanya fokus pada perbaikan infrastruktur.
- > Kurangnya program kesadaran keamanan.
- > Minimnya keterlibatan IT *Section* dalam proses pengembangan aplikasi baru.
- > Limited investment in *security* infrastructure.
- > IT *Security* only focuses on improving infrastructure.
- > Lack of *security* awareness program.
- > Lack of IT *Section* involvement in the process of developing new applications.

- > Akan melakukan secara aktif dan regular untuk penerapan VA dan *pentester*.
- > Melakukan investasi untuk perbaikan infrastruktur.
- > Peningkatan prosedur keamanan yang komprehensif dan sesuai dengan standar SOP keamanan yang sudah ditentukan.
- > Akan melakukan program kesadaran keamanan yang terintegrasi dan terpadu serta melakukan penegakan kesadaran prosedur keamanan.
- > IT *Section* akan dilibatkan dalam proses pengembangan aplikasi baru.
- > Will actively and regularly implement VA and *pentester*.
- > Investing in infrastructure improvement.
- > Enhanced comprehensive *security* procedures and in accordance with the predetermined *security* SOP standards.
- > Will carry out integrated and unified *security* awareness programs and enforce awareness of *security* procedures.
- > IT *Section* will be involved in the process of developing new applications.

## Penerapan Manajemen Risiko dalam Penggunaan Teknologi Informasi

Penggunaan TI dalam kegiatan operasional Bank juga dapat meningkatkan risiko yang dihadapi. Oleh karena itu, diperlukan penerapan manajemen risiko secara efektif. Penerapan manajemen risiko dalam penggunaan TI dilakukan melalui 4 (empat) aspek yang dijelaskan sebagai berikut.

## Implementation of Risk Management in the Use of Information Technology

The use of IT in the Bank's operational activities may also increase the Bank's risks. Therefore, effective risk management implementation is required. The risk management in the use of IT is implemented through 4 (four) aspects as described below.



**Pengawasan Aktif Dewan Komisaris dan Direksi**  
Active Monitoring of Board of Commissioners and Board of Directors

**Pengawasan aktif Dewan Komisaris dan Direksi beserta organ pendukung masing-masing diperlukan dalam penggunaan TI. Berdasarkan hal tersebut, Bank telah menetapkan wewenang dan tanggung jawab yang jelas untuk masing-masing pihak tersebut.**

Active monitoring by the Board of Commissioners and Board of Directors including their respective supporting organs is required in the use of IT. Based on that, the Bank established clear authority and responsible for each party.



- Dewan Komisaris / Board of Commissioners**
1. Mengevaluasi, mengarahkan, dan memantau Rencana Strategis Teknologi Informasi dan kebijakan Bank terkait penggunaan TI; serta
  2. Mengevaluasi pertanggungjawaban Direksi atas penerapan manajemen risiko dalam penggunaan TI.
1. Evaluating, directing, and monitoring the Information Technology Strategic Plan and Bank policies related to IT use; and
2. Evaluating the Board of Directors' accountability for the implementation of risk management in the use of IT.

- Direksi / Board of Directors**
1. Menetapkan Rencana Strategis Teknologi Informasi dan kebijakan Bank terkait penggunaan TI;
  2. Menetapkan kebijakan, standar, dan prosedur terkait penyelenggaraan TI yang memadai dan mengkomunikasikannya secara efektif, baik pada Divisi *Information Technology* maupun pengguna TI;
  3. Memastikan:
    - a. TI yang digunakan Bank dapat mendukung perkembangan usaha dan pencapaian tujuan bisnis, serta kelangsungan pelayanan terhadap nasabah Bank;
    - b. Terdapat kegiatan peningkatan kompetensi HC yang terkait dengan penyelenggaraan dan penggunaan TI;
    - c. Ketersediaan sistem pengelolaan pengamanan informasi yang efektif dan dikomunikasikan kepada Divisi *Information Technology* maupun pengguna TI;
    - d. Penerapan proses manajemen risiko dalam penggunaan TI dilaksanakan secara memadai dan efektif;
    - e. Kebijakan, standar, dan prosedur TI diterapkan secara efektif pada Divisi *Information Technology* maupun pengguna TI; serta
    - f. Terdapat sistem pengukuran kinerja proses penyelenggaraan TI.
1. Establishing the Information Technology Strategic Plan and Bank policies related to the use of IT;
2. Establishing adequate IT policies, standards, and procedures and communicating them effectively, to both the Information Technology Division and IT users;
3. Confirming that:
- a. The IT used by the Bank can support business development and achieve business objectives, as well as service continuity to the Bank's customers;
  - b. There are activities to increase HC competencies related to the implementation and use of IT;
  - c. There is availability of effective information security management system and such is communicated to the Information Technology Division and IT users;
  - d. The implementation of risk management process in the use of IT is adequate and effective;
  - e. IT policies, standards, and procedures are effectively implemented in the Information Technology Division or IT users; and
  - f. Performance measurement system of IT implementation process is available.

Terkait hal ini, Direksi memiliki Komite Teknologi Informasi yang berperan dalam memberikan rekomendasi kepada Direksi terkait seluruh aspek tata kelola TI dan penerapan manajemen risiko dalam penggunaan TI.

Regarding this matter, the Board of Directors has an Information Technology Committee that has a role in providing recommendations to the Board of Directors related to all aspects of IT governance and implementation of risk management in the use of IT.

**Kecukupan Kebijakan, Standar, dan Prosedur Penggunaan Teknologi Informasi**

Bank memiliki kebijakan, standar, dan prosedur penggunaan TI yang khususnya dimuat dalam Kebijakan IT yang telah disahkan melalui Surat Keputusan Direksi No. 005/SK-DIR/09/18 tanggal 28 September 2018 tentang Kebijakan Manajemen *Information Technology*. Kebijakan tersebut telah diterapkan secara konsisten dan senantiasa ditinjau kembali untuk memastikan kesesuaiannya dengan perkembangan usaha Bank dan perubahan peraturan yang berlaku. Kebijakan ini meliputi aspek manajemen, pengembangan dan pengadaan, operasional TI, jaringan komunikasi, pengamanan informasi, rencana pemulihan bencana, layanan perbankan elektronik, penggunaan pihak penyedia jasa TI, serta penyediaan jasa TI oleh Bank.

**Adequacy of Policies, Standards, and Procedures of Use of Information Technology**

The Bank has policies, standards, and procedures of the use of IT which are particularly listed in the IT Policy approved under the Board of Directors' Decision Letter No. 005/SK-DIR/09/18 dated 28 September 2018 on Information Technology Management Policy. The policy has been applied consistently, and constantly reviewed to ensure compliance with the Bank's business development and changes to the prevailing regulations. These policies cover aspects of management, development, and procurement, IT operations, communications networks, information security, disaster recovery plans, electronic banking services, use of IT service providers, and IT services provision by the Bank.

**Kecukupan Proses Identifikasi, Pengukuran, Pemantauan, dan Pengendalian Risiko Penggunaan Teknologi Informasi**

Bank memiliki kebijakan, standar, dan prosedur atas proses manajemen risiko TI yang dimuat dalam Kebijakan IT yang telah disahkan melalui Surat Keputusan Direksi No. 007/SK-DIR/06/19

**Adequacy of Risk Identification, Measurement, Monitoring and Management Process of the Use of Information Technology**

The Bank has policies, standards, and procedures on IT risk management process contained in IT Policy approved under Board of Directors' Decision Letter No. 007/SK-DIR/06/19 dated

tanggal 27 Juni 2019 tentang Kebijakan Manajemen Risiko Terkait *Information Technology*. Berdasarkan kebijakan tersebut, Bank memastikan kelangsungan dan kestabilan operasional TI, serta memitigasi risiko yang berpotensi dapat mengganggu kegiatan operasional Bank. Bank juga melakukan langkah-langkah pengendalian agar jaringan komunikasi yang disediakan Bank memenuhi prinsip kerahasiaan, integritas, dan ketersediaan.

#### Sistem Pengendalian Internal atas Penggunaan Teknologi Informasi

Bank melaksanakan pengendalian internal terhadap seluruh aspek penggunaan TI melalui audit rutin oleh Divisi SKAI/ *Integrated & Anti Fraud*. Pada tahun 2021, terdapat 32 temuan terkait TI, antara lain:

1. Temuan terkait risiko strategis sebanyak 2 item;
2. Temuan terkait risiko operasional sebanyak 26 item; dan
3. Temuan terkait risiko legal sebanyak 4 item.

Seluruh temuan tersebut telah ditindaklanjuti oleh Tim Audit dan seluruh temuan telah diselesaikan.

## Pengembangan Teknologi Informasi Tahun 2021

Pengembangan TI harus menjawab kebutuhan usaha dalam 2 (dua) segi, yakni pelayanan nasabah dan operasional organisasi. Sistem TI yang berkualitas memungkinkan terciptanya interaksi cepat dan nyaman antara nasabah dengan Bank, yaitu melalui produk-produk terbaik Bank. Sementara, dari segi operasional, sistem TI mendorong efisiensi dan produktivitas kerja dan biaya. Menyadari nilai penting ini, Bank Victoria memastikan bahwa sistem TI Bank senantiasa sesuai dengan kebutuhan organisasi, yaitu dengan melaksanakan penyempurnaan dan pengkinian sistem secara berkala.

Bank Victoria telah melakukan pengembangan TI untuk mendukung *customer experience* dalam meningkatkan layanan nasabah dan mendekatkan Bank kepada nasabah. Pengembangan tersebut dijalankan oleh Divisi Teknologi Informasi. Uraian pengembangan TI yang telah dilaksanakan Bank Victoria selama tahun 2021 sebagai berikut.

27 June 2019 on Risk Management Policy Related to Information Technology. Under such policies, the Bank ensures the continuity and stability of IT operations, as well as mitigates risks that may potentially disrupt the Bank's operational activities. The Bank also carries out controlling measures so that the communication network provided by the Bank meets the principles of confidentiality, integrity, and availability.

#### Internal Control System for the Use of Information Technology

The Bank exercises internal control over all aspects of IT usage through regular audits by the Internal Audit/Integrated & Anti Fraud Division. In 2021, there were 32 IT related findings, including:

1. 2 findings related to strategic risks;
2. 26 findings related to operational risks; and
3. 4 findings related to strategic risks;

These findings were followed up by the Audit Division and all findings were duly resolved.

## Information Technology Development in 2021

Information Technology development must answer business needs in 2 (two) aspects, namely customer services and organization operations. A quality IT system allows the establishment of fast and comfortable interactions between customers and the Bank, ie. through the Bank's best products. Meanwhile, from an operational perspective, the IT system boosts work efficiency and productivity as well as costs. Realizing this important value, Bank Victoria ensures that the Bank's IT systems are always in line with the organization needs, by improving and updating the system regularly.

Bank Victoria has developed IT to support the customer experience in improving customer service and bringing the Bank closer to the customer. Such development is carried out by the Information Technology Division. Description of the IT development carried out by Bank Victoria during 2021 is as follows.

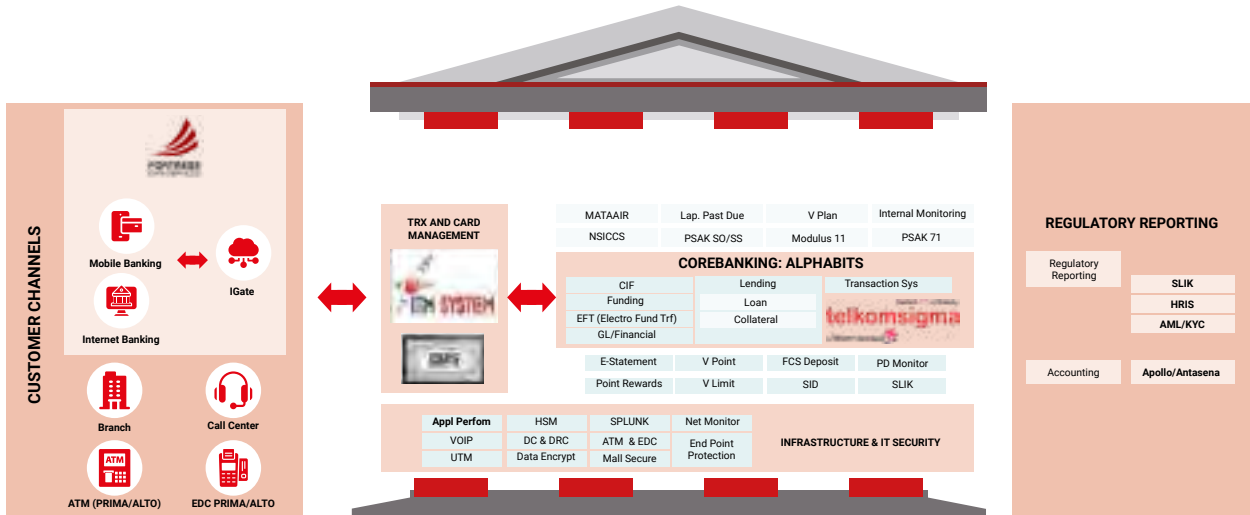
Tujuan Objectives	Bagian Penambahan Additional Part	Pelaksanaan Implementation
Poin Maxima Maxima Point	Perhitungan Poin Tabungan Maxima Point Calculation for Maxima Savings	Februari 2021 February 2021
Manajemen User User Management	Pencatatan manajemen user User management recording	Desember 2021 December 2021
Monitoring Report Report Monitoring	Monitoring pelaporan ke regulator Monitoring reporting to the regulator	November 2021
e-Document	Elektronifikasi Dokumen dan Workflow Electronification of Documents and Workflow	Agustus 2021 August 2021
Wealth Management	Penggantian aplikasi <i>Wealth Management</i> Replacement of Wealth Management application	Oktober 2021 October 2021

Tujuan Objectives	Bagian Penambahan Additional Part	Pelaksanaan Implementation
Smart AML	KYC dan pelaporan goAML KYC and goAML reporting	Februari 2021 February 2021
Antasena	Enhancement Pelaporan ke Bank Indonesia Enhancement of Reporting to Bank Indonesia	Desember 2021 December 2021

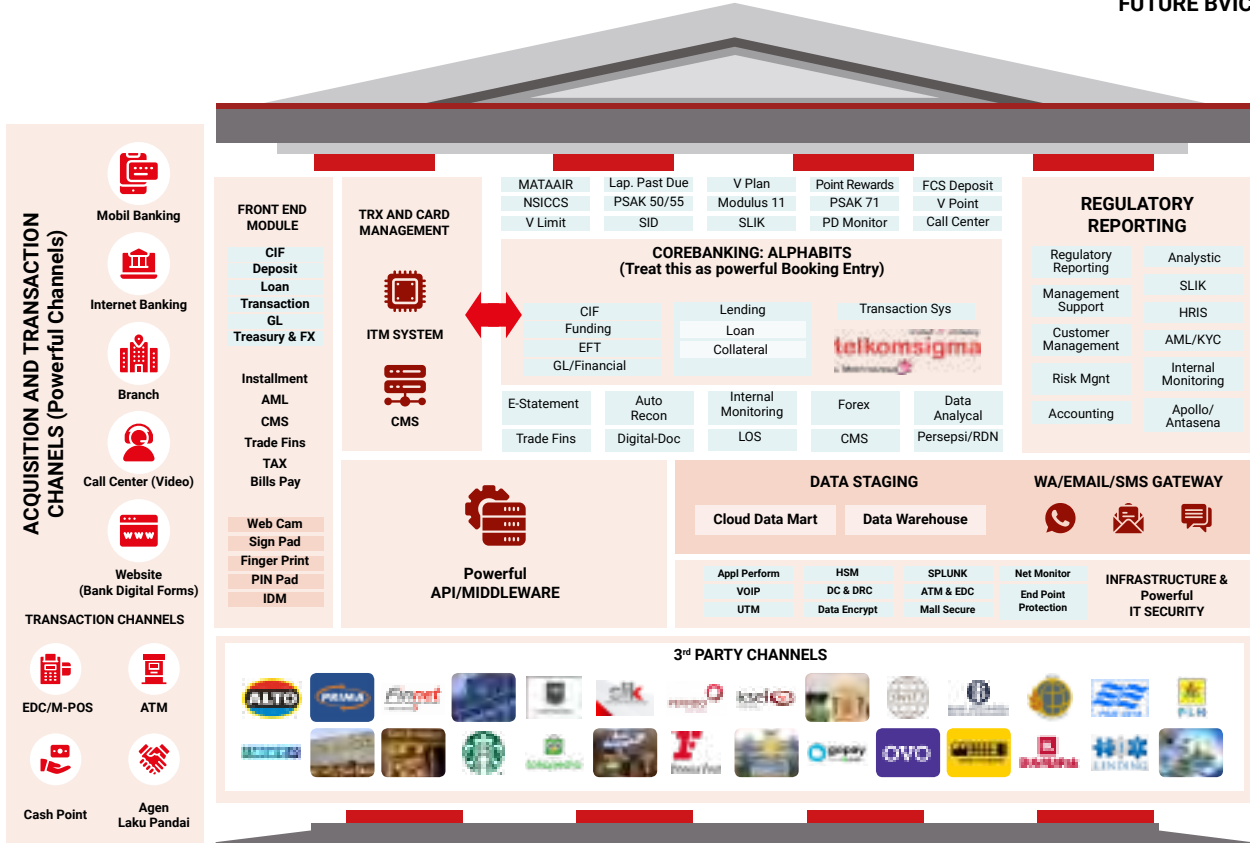
**Roadmap Pengembangan Aplikasi dan Infrastruktur Tahun 2021-2026**  
Roadmap for Application and Infrastructure Development 2021-2026



EXISTING BVIC



FUTURE BVIC



Pada tahun 2021, Bank secara khusus mengembangkan teknologi sistem informasi dan infrastruktur pendukung kegiatan usaha Bank Victoria yang meliputi:

1. Pengembangan *Revamp Mobile Banking* untuk memberikan pelayanan nasabah yang lebih baik;
2. Pengembangan *Middleware* untuk memudahkan koneksi antar sistem internal maupun eksternal;
3. Penggantian aplikasi *Wealth Management* untuk dapat membantu nasabah dalam pengelolaan terkait reksadana dan investasi;
4. Pengembangan Bank Persepsi untuk pembayaran pajak *online*;
5. Adanya aplikasi *e-Document* yang membantu dalam *re-engineering* proses dan penghematan arsip;
6. Sistem Aplikasi Antasena Bank sesuai dengan jadwal dari regulator Bank Indonesia;
7. Sistem Smart AML untuk pelaporan ke goAML PPAATK; dan
8. Sistem informasi akuntansi yang digunakan adalah sesuai dengan Pedoman Standar Akuntansi Keuangan 71 (PSAK 71).

## Penggunaan Dana dalam Pengembangan Sistem Teknologi Informasi

Guna menopang infrastruktur teknologi dan sistem informasi yang lebih modern, Bank melakukan pemeliharaan dan pemuktahiran aplikasi dan sistem secara berkelanjutan. Hal tersebut dilakukan sebagai langkah pengembangan atas infrastruktur sistem TI. Rincian penggunaan dana modal dalam pengembangan infrastruktur sistem TI pada tahun 2021 sebagai berikut.

Uraian Description	Biaya (Rp) Cost (Rp)
Hardware	2,977,149,000
Software	5,619,782,011
Maintenance Hardware	1,055,372,438
Maintenance Software	1,885,184,686
Jaringan / Network	2,949,413,803
Manage Service	2,829,500,000
Membership	81,000,000
Jasa <i>Vulnerability Assesment</i> dan <i>Penetration Testing</i> / Vulnerability Assesment and Penetration Testing Service	372,600,000
<b>Total</b>	<b>17,770,001,938</b>

## Strategi Pengembangan Teknologi Informasi Tahun 2022

Di tahun 2022-2024, pada bidang TI, Bank Victoria akan mendukung pelaksanaan usaha atau meluncurkan produk/ layanan dalam mendukung lini usaha Bank sebagai berikut.

### 1. *Revamp Internet Banking Mobile Banking (IBMB)*

Melakukan pengembangan IBMB Bank sehingga memiliki fitur dan produk digital seperti *Digital Onboarding (biometric)*, *Digital Form*, *Victoria Mart*, *Cardless withdrawal*, *QRIS*, *Bancassurance*, *Reksadana*, *Surat Berharga/SBN*, *Digital Debit (OTP)*, *RDN*, *Sosial dan Keagamaan*, *Lifestyle*, *eStatement*, *Remittance*, *SKN* dan *RTGS (multiple transaction)*, *Online Prima (HVT)*, *Pembayaran Pajak*, *Top Up eMoney (Bank Mandiri) - eWallet*, *Point reward*, *Video Banking & Digital Operation*, *WA - Chat bot*, *Bill Payment*, *Digital Deposito*, serta *Victoria Advertisement*;

In 2021, the Bank specifically developed information system technology and business support infrastructures for Bank Victoria's business which include:

1. Development of *Revamp Mobile Banking* to provide better services to the customers;
2. Development of *Middleware* to facilitate connection between both internal and external system;
3. Replacement of *Wealth Management* application to assist the customers in managing mutual fund and investment;
4. Development of *Perception Bank* for online tax payment;
5. The establishment of *e-Document* application to assist in *re-engineering* process and archive saving;
6. Bank *Antasena* application system according to schedule set by Bank Indonesia;
7. *Smart AML* system for reporting to goAML PPAATK; and
8. The accounting information system used is in accordance with the *Financial Accounting Standards Guidelines 71 (PSAK 71)*.

## Use of Fund in Developing Information Technology System

Bank Victoria supports a modernized technology infrastructure and information system, and continuously maintains and upgrades its applications and systems. This is carried out as measures in developing IT system infrastructure. Below are details of the use of capital funds in IT system infrastructure development in 2021.

## Information Technology Development Strategy in 2022

In 2022-2024, Bank Victoria's Information Technology Division will support the business implementation or the launch of products/ services to support the Bank's lines of business as follows.

### 1. *Revamp Internet Banking Mobile Banking (IBMB)*

To develop Bank IBMB so to have digital feature and product such as *Digital Onboarding (biometric)*, *Digital Form*, *Victoria Mart*, *Cardless withdrawal*, *QRIS*, *Bancassurance*, *Mutual Fund*, *Government Bonds/SBN*, *Digital Debit (OTP)*, *RDN*, *Social and Religious*, *Lifestyle*, *eStatement*, *Remittance*, *SKN* and *RTGS (multiple transaction)*; *Online Prima (HVT)*, *Tax Payment*, *eMoney Top Up (Mandiri Bank) - eWallet*, *Point Reward*, *Video Banking & Digital Operation*, *WA - Chat bot*, *Bill Payment*, *Digital Time Deposit*, and *Victoria Advertisement*;

2. **Digital Produk Bank (contohnya: Tabungan Khusus Pembukaan secara Digital)**  
Pembuatan produk Bank untuk mendukung layanan *digital onboarding* nasabah *Internet Banking* dan *Mobile Banking* (seperti Tabungan khusus Pembukaan di IBMB);
  3. **QRIS (QR Indonesia Standard)**  
Pembayaran dengan menggunakan QR melalui *channel Mobile Banking* sesuai dengan standar Bank Indonesia;
  4. **Bank Persepsi E-Channel**  
Layanan perbankan untuk menerima setoran penerimaan negara bukan dalam rangka impor dan ekspor, yang meliputi penerimaan pajak, bea cukai, dan penerimaan bukan pajak;
  5. **RDN (Rekening Dana Nasabah) Digital Over the Counter dan E-Channel**  
Tambahkan layanan Bank sebagai Bank RDN untuk mengembangkan tambahan layanan perbankan sebagai administrator RDN;
  6. **Mobile Monitoring**  
Pembuatan aplikasi pemantauan *flow* proses kredit dan membantu Bank dalam melakukan *tracking* dan *monitoring* kredit serta Manajemen Informasi Sistem (MIS);
  7. **Pengembangan Aplikasi Penjualan SBSN Syariah Ritel dan Produk SBSN Syariah Ritel**  
Layanan penambahan produk SBN Syariah Ritel melalui situs web Bank Victoria, untuk mengakomodir pembelian nasabah ritel dan produk SBN Syariah Ritel dari Kementerian Keuangan Republik Indonesia;
  8. **Digital Debit (contohnya: untuk E-Commerce)**  
Pembayaran dengan menggunakan Kartu Debit di layanan pembayaran *e-commerce*;
  9. **Cash Cardless Withdrawal (Tarik Tunai tanpa Kartu)**  
Dalam melakukan penarikan tunai di Mesin ATM dan Teller dengan memasukkan *challenges code*/nomor tertentu yang akan dihasilkan dari *Mobile Banking*;
  10. **Revamp Internet Banking Business**  
Melakukan pengembangan terhadap fitur Internet Banking Business diantaranya dengan dilengkapi oleh *cash management & payroll*;
  11. **Loan Origination System (termasuk CRM, Cloud Server)**  
Aplikasi yang dapat menjangkau layanan kredit dengan memberikan layanan pendaftaran baru untuk nasabah yang mengajukan kredit, mengontrol *flow* proses kredit di Bank dan *monitoring* posisi pengajuan kredit serta meminimalisir tumpang tindih dan miss proses kredit;
  12. **Video Banking dan Digital Operations**  
Layanan transaksi non tunai oleh nasabah dengan menggunakan *video call* dan *chatbot*;
  13. **Treasury System**  
*Sistem treasury* yang memberikan layanan operasional meliputi informasi valas dan transaksi pasar modal maupun *trade finance* bagi transaksi di cabang-cabang;
  14. **Whatsapp Official Bank Victoria (termasuk Chatbot AI)**  
Sistem komunikasi yang menggunakan *social chat platform* untuk dapat membangun komunikasi dan sebagai media informasi yang lebih baik kepada nasabah;
  15. **Website Credit and Funding Referral Leads**  
Aplikasi didalam website resmi Bank yang dapat digunakan oleh masyarakat umum untuk memberikan referensi calon nasabah/nasabah kredit maupun pendanaan kepada Bank;
2. **Bank Bank Products (for example: Savings Specifically Opened Digitally)**  
Establishment of Bank products using digital onboarding service for Internet Banking and Mobile Banking customers (such as Special Savings For IBMB Opening);
  3. **QRIS (QR Indonesian Standard)**  
Payment using QR through Mobile Banking Channel according to Bank Indonesia's standard;
  4. **E-Channel Collecting Bank**  
Banking service to receive state revenue other than import and export purposes, which includes tax revenue, customs and excise, and non-tax revenue;
  5. **Customer fund Accounts (RDN/Rekening Dana Nasabah) Digital Over the Counter and E-Channel**  
Bank service addition as RDN Bank to develop banking service addition as RDN administrator;
  6. **Mobile Monitoring**  
The establishment of credit process flow monitoring and assisting the Bank in tracking and monitoring credit and Management Information System (MIS);
  7. **Development of Application for Retail Sharia SBSN Selling and Retail Sharia SBSN Products**  
Service for Retail Sharia SBN product addition through Bank Victoria's website, to accommodate purchase from retail customers and Retail Sharia SBN products from Ministry of Finance of the Republic of Indonesia;
  8. **Digital Debit (such as: for E-Commerce)**  
Payment using Debit Card at the e-commerce payment service;
  9. **Cardless Cash Withdrawal (Cash Withdrawal without Card)**  
Withdrawing money from ATM Machine and Teller, by using challenges code/specific number generated from Mobile Banking;
  10. **Revamp Internet Banking Business**  
Revamping Internet Banking business feature among other by adding cash management & payroll feature;
  11. **Loan Origination System (including CRM, Cloud Server)**  
An application that can cover loan service by giving new registration service to customers applying for loan, controlling loan process flow at the Bank and monitoring loan application position and minimizing overlapping and errors in loan process;
  12. **Video Banking and Digital Operations**  
Customer's non-cash transaction service by using video call and chatbot;
  13. **Treasury System**  
Treasury system providing operational service which includes foreign exchange information and stock exchange transactions, as well as trade finance for transactions in branch offices;
  14. **Bank Victoria's Official Whatsapp (including AI Chatbot)**  
Communication system using social chat platform to assist in building communication and as a better information media for the customers;
  15. **Website Credit and Funding Referral Leads**  
Application in the bank's official website which can be used by the public to give references to potential clients/credit clients or funding to the Bank;



- 16. Bancassurance Digital dan Penambahan Kerjasama dengan Rekanan Perusahaan Asuransi untuk Produk Tradisional dan non Tradisional Baik Dipasarkan secara Digital maupun Konvensional**  
Memberikan diversifikasi produk Bancassurance secara digital dan menjalin Kerjasama dengan rekanan baru perusahaan asuransi untuk Bancassurance;
- 17. Reksadana Digital dan Penambahan Kerja Sama dengan Rekanan Aset Manajemen untuk Produk Reksa Dana, baik yang Dipasarkan secara Digital maupun Konvensional**  
Memberikan diversifikasi produk Reksadana secara digital dan menjalin kerjasama dengan rekanan baru Manajer Investasi dalam pengelolaan Reksadana;
- 18. Mitra Distribusi SBN Syariah Ritel**  
Aktivitas baru menjadi mitra distribusi untuk penjualan Surat Berharga Negara Syariah Ritel (SBN Syariah Ritel);
- 19. SBN Konvensional dan Syariah Digital**  
Pengembangan aplikasi pembelian SBN Konvensional dan Syariah secara digital;
- 20. White Labeling Penjualan Obligasi Ritel di Secondary Market dengan Sekuritas**  
Menjadi sub distributor untuk penjualan obligasi Ritel di secondary market/pasar sekunder dengan white label aplikasi dari perusahaan sekuritas;
- 21. Digital Form**  
Dalam melakukan transaksi perbankan, nasabah dapat melakukan transaksi keuangan dengan media digital yang dilakukan dimana saja dan kapan saja menggunakan media Video Banking Bank yang tersedia di website, mobile banking, internet banking dengan juga tersedianya digital formulir Bank yang mudah untuk diisi oleh nasabah;
- 22. Digital Produk non Bank**  
Nasabah institusi non bank dapat mengakses produk dan layanan perbankan;
- 23. HRIS**  
Meningkatkan kompetensi karyawan bank dalam memberikan produk layanan kepada nasabah maupun administrasi untuk karyawan yang lebih terstruktur;
- 24. Big Data**  
Memberikan kemudahan untuk bank dalam menganalisa data transaksi ataupun nasabah serta mempermudah bagi manajemen dalam pengambilan keputusan, untuk nantinya memberikan informasi produk layanan terbaik bagi nasabah;
- 25. E-Budgeting**  
Memberikan kemudahan dalam melakukan perencanaan, pemantauan, dan analisa budget bank secara lebih sistematis;
- 26. BI Fast**  
Memberikan kemudahan dalam melakukan transaksi antar bank secara realtime 24x7 sesuai dengan ketentuan regulator;
- 27. Koneksi ke Reuters untuk Mendukung Produk Forex Retail via Digital atau Counter Teller**  
Memberikan layanan informasi nilai valuta asing secara realtime;
- 28. Kerjasama dengan Peer to Peer Lending/Open API Kerjasama dengan Ekosistem Lending Digital**  
Menjalinkan kerjasama dengan perusahaan fintech peer to peer lending melalui kanal digital IBMB;
- 29. Pengembangan Sistem untuk Keperluan Penguatan SISMONTAVAR**  
Sistem pemantauan transaksi valuta asing terhadap rupiah secara langsung dan seketika (realtime); dan
- 30. SLIK**  
Sistem untuk melakukan penatausahaan dan pelaporan kepada regulator dan dalam rangka penatakelolaan administrasi dalam proses kredit.
- 16. Digital Bancassurance and Additional Cooperation with Insurance Company as a Partner for Traditional and Non-Traditional Products, either being Marketed Digitally or Conventionally**  
Providing digital diversification for Bancassurance products and building cooperation with new insurance company as a partner for Bancassurance;
- 17. Digital Mutual Fund and Additional Cooperation with Assets Management as a Partner for Mutual Fund Products, either being Marketed Digitally or Conventionally**  
Providing digital diversification for Mutual Fund products and building cooperation with investment manager as a new partner in managing Mutual Fund;
- 18. Retail Sharia SBN Distribution Partner**  
New activity to be distribution partner for Retail Sharia Government Bonds (SBN Sharia Retail);
- 19. Digitalized Conventional and Sharia SBN**  
Development of digitalized application for purchase of Conventional and Sharia SBN;
- 20. White Labeling of Retail Bonds Sale in Secondary Market with Securities**  
To become sub-distributor for Retail bonds sale in secondary market with white label application from securities company;
- 21. Digital Form**  
Customers may conduct financial transactions in the bank using digital media from anywhere and at any time using Video Banking media owned by the Bank available at the website, mobile banking, internet banking, and also supported with digital Bank forms which are easy to be completed by the customers;
- 22. Non-Bank Digital Products**  
Non-bank institution customers can access banking products and services;
- 23. HRIS**  
Enhancing bank's employees competency in providing services to customers, and providing a more structured employees administration;
- 24. Big Data**  
Providing ease to the Bank in analyzing transactions and customers data and assisting the management in decision making, so to be able to give the best information regarding services provided to the customers;
- 25. E-Budgeting**  
Providing ease for the Bank planning, monitoring, and budget analyzing in a more systematic manner;
- 26. BI Fast**  
Providing ease of transaction between banks in realtime 24x7 according to the regulator's provisions;
- 27. Connection to Reuters to Support Retail Forex Products via Digital or Counter Teller**  
Providing realtime information service for foreign exchange rate;
- 28. Cooperation with Peer to Peer Lending/Open API Cooperation with Digital Ecosystem Lending**  
Building cooperation with fintech peer to peer lending companies through IBMB digital channel;
- 29. System Development for the Purpose of Strengthening SISMONTAVAR**  
Direct and realtime monitoring system for foreign exchange against rupiah transactions; and
- 30. SLIK**  
A system to administer and report to the regulator for the purpose of administering credit process.



# Tata Kelola Perusahaan

Good Corporate Governance

## Penghargaan di Bidang GCG

Awards in GCG



**2<sup>nd</sup> The Best Indonesia GCG Award VI 2021**  
dari Indonesia Good Corporate Governance Award  
from Indonesia Good Corporate Governance Award







## Dasar Implementasi GCG

### Basis of GCG Implementation



Penerapan tata kelola perusahaan yang baik (*good corporate governance/GCG*) menjadi salah satu komponen utama yang penting untuk meningkatkan kinerja usaha, melindungi hak-hak pemangku kepentingan, serta meningkatkan kepatuhan terhadap peraturan perundang-undangan serta nilai etika yang berlaku umum pada industri perbankan. Kemudian, untuk mendukung tercapainya Visi dan Misi, Bank meningkatkan pemenuhan komitmen atas penerapan prinsip dan praktik GCG secara berkelanjutan serta menjadikannya sebagai budaya kerja yang berlaku di seluruh tingkatan organisasi. Bank terus menginternalisasikan seluruh prinsip GCG dalam setiap kegiatan bisnis dalam rangka mencapai tujuan jangka panjang yang berkesinambungan.

Dalam praktiknya, implementasi GCG Bank Victoria mengacu pada peraturan dan ketentuan yang meliputi Undang-Undang Republik Indonesia, Peraturan Otoritas Jasa Keuangan, prinsip *Corporate Governance* yang dikembangkan oleh *Organization for Economic Cooperation and Development* (OECD), *ASEAN Corporate Governance Scorecard*, Pedoman GCG Perbankan Indonesia yang dikembangkan oleh Komite Nasional Kebijakan *Governance* (KNKG), serta *Principles for Enhancing Corporate Governance* yang diterbitkan oleh *Basel Committee on Banking Supervision*.

Implementation of good corporate governance (GCG) is one of the important key components in improving business performance, protecting stakeholders' rights, and improving compliance with the laws and regulations and ethical value prevailing in general in the banking industry. Furthermore, in order to achieve its Vision and Mission, the Bank enhances its commitment to implementing GCG principles and practices sustainably and transforming them into a work culture applied in the entire organizational levels. The Bank also continuously internalizes all GCG principles in all of its business activities in order to achieve sustainable long-term goals.

In practice, Bank Victoria's GCG implementation refers to the laws and regulations, which include the Laws of the Republic of Indonesia, Financial Services Authority Regulations, Corporate Governance principles developed by the Organization for Economic Cooperation and Development (OECD), ASEAN Corporate Governance Scorecard, Indonesian Banking GCG Principles developed by the National Committee of Governance Policies (KNKG), and Principles for Enhancing Corporate Governance issued by the Basel Committee on Banking Supervision.

Pelaksanaan kegiatan usaha Bank juga selalu didasari pertimbangan terhadap pemenuhan prinsip-prinsip GCG, yang diuraikan sebagai berikut.

The Bank's business activities are also carried out with due observance of the compliance with GCG principles, as described hereinbelow.



#### Transparansi Transparency

**Penjelasan:**

Mengungkapkan informasi secara tepat waktu, memadai, jelas, akurat dan dapat diperbandingkan serta dapat diakses oleh pihak yang berkepentingan.

**Standar Pemenuhan:**

Bank harus mengungkapkan informasi secara tepat waktu, memadai, jelas, akurat, dan dapat dibandingkan serta mudah diakses pemangku kepentingan sesuai dengan haknya.

**Explanation:**

Disclosing information in a timely, adequate, clear, accurate, comparable, and accessible manner for all relevant parties.

**Fulfillment Standard:**

The Bank must disclose information in timely, adequate, clear, accurate, comparable manner, and easily accessible by all stakeholders according to their respective rights.



#### Akuntabilitas Accountability

**Penjelasan:**

Menetapkan tugas dan tanggung jawab yang jelas bagi masing-masing organ Dewan Komisaris dan Direksi serta seluruh jajaran di bawahnya yang selaras dengan Visi, Misi, Nilai-Nilai Perusahaan, sasaran usaha, dan strategi bank.

**Standar Pemenuhan:**

Bank harus menetapkan fungsi tugas dan tanggung jawab yang jelas dari setiap komponen organisasi, selaras dengan Visi dan Misi, Nilai-Nilai Perusahaan, sasaran usaha, serta strategi Bank. Setiap komponen organisasi mempunyai kompetensi sesuai dengan tugas dan tanggung jawab masing-masing, serta harus dapat memahami perannya dalam pelaksanaan GCG. Bank juga harus memastikan adanya *check and balance* dalam pengelolaan Bank, dimilikinya ukuran kinerja dari setiap jajaran berdasarkan ukuran yang disepakati secara konsisten, sesuai dengan nilai-nilai Bank, sasaran usaha, strategi Bank, serta dimilikinya sistem *reward and punishment*.

**Explanation:**

Determining clear duties and responsibilities for each Board of Commissioners and Board of Commissioners organ and the entire level under their supervision, consistent with the Vision, Mission, Company Values, the Bank's business objectives and strategies.

**Fulfillment Standard:**

The Bank must determine a clear function of duties and responsibilities for each organizational component, consistent with the Bank's Vision and Mission, Values, business objectives, and strategies. Each organizational component has the competence in accordance with the respective duties and responsibilities, and must be able to understand its role in GCG implementation. The Bank must also ensure the availability of check and balance system in the Bank's management, the consistent performance measure of each rank based on the agreed measures, in accordance with the Bank's values, business objectives, strategies, and reward and punishment system.



#### Pertanggungjawaban Responsibility

**Penjelasan:**

Menetapkan tugas dan tanggung jawab yang jelas bagi masing-masing organ anggota Bank yang berpegang pada prinsip kehati-hatian (*prudential banking practices*) dan menjamin kepatuhan terhadap peraturan yang berlaku.

**Standar Pemenuhan:**

Bank harus mampu bertindak sebagai *Good Corporate Citizen* serta memegang prinsip *prudential banking practices*. Prinsip tersebut dijalankan sesuai dengan ketentuan dan peraturan perundang-undangan yang berlaku agar tetap terjaga kelangsungan usaha Bank.

**Explanation:**

Determining clear duties and responsibilities for each organ of the Bank by upholding the prudential banking practices and ensuring compliance with the prevailing regulations.

**Fulfillment Standard:**

The Bank must be able to act as a Good Corporate Citizen and upholds the prudential banking practices principle. Such principle must be carried out in accordance with the prevailing laws and regulations in order to maintain the Bank's business continuity.



**Independensi**  
Independence

**Penjelasan:**

Mencegah terjadinya dominasi yang tidak wajar oleh pemangku kepentingan manapun dan tidak terpengaruh oleh kepentingan sepihak serta terbebas dari benturan kepentingan (*conflict of interest*).

**Standar Pemenuhan:**

Bank harus dikelola secara profesional serta memiliki sejumlah perangkat kepatuhan yang diterapkan dengan tujuan memberikan batas yang wajar terhadap dominasi yang tidak wajar oleh *stakeholder* manapun dan benturan kepentingan (*conflict of interest*).

**Explanation:**

Preventing any unfair domination by any shareholder and not be affected by any unilateral interest and free from any conflict of interest.

**Fulfillment Standard:**

The Bank must be managed professionally and possess a set of compliance tools applied in order to give reasonable limitation to unfair domination by any stakeholder and any conflict of interest.



**Kewajaran dan Kesetaraan**  
Fairness and Equality

**Penjelasan:**

Memperhatikan kepentingan seluruh pemangku kepentingan berdasarkan asas kesetaraan dan kewajaran (*equal treatment*).

**Standar Pemenuhan:**

Bank harus memberikan kesempatan kepada seluruh pemangku kepentingan untuk memberikan masukan dan menyampaikan pendapat bagi kepentingan Bank serta membuka akses terhadap informasi sesuai dengan prinsip keterbukaan.

**Explanation:**

Paying attention to the interests of all stakeholders based on the principle of equality and fairness (*equal treatment*).

**Fulfillment Standard:**

The Bank must give opportunity to all stakeholders to provide input and express their opinion for the Bank's interest and to open access to information pursuant to the principle of transparency.

## Komitmen Implementasi GCG Commitment to Implement GCG

Komitmen implementasi GCG di Bank Victoria dimulai dari internalisasi berbagai peraturan dan ketentuan yang mendasari pelaksanaan GCG ke dalam peraturan dan ketentuan yang ditetapkan oleh Bank, serta yang disarikan ke dalam Visi, Misi, dan Nilai-Nilai Budaya Bank. Hal ini diikuti dengan komitmen organ-organ tata kelola Bank, yang meliputi Rapat Umum Pemegang Saham (RUPS), Dewan Komisaris, dan Direksi, beserta organ pendukung masing-masing, untuk memainkan perannya sesuai dengan peraturan yang telah disepakati. Pelaksanaan peran oleh masing-masing organ tata kelola Bank juga dilakukan dengan berlandaskan pada prinsip-prinsip GCG guna mencapai kesinambungan usaha jangka panjang (*good corporate sustainability*).

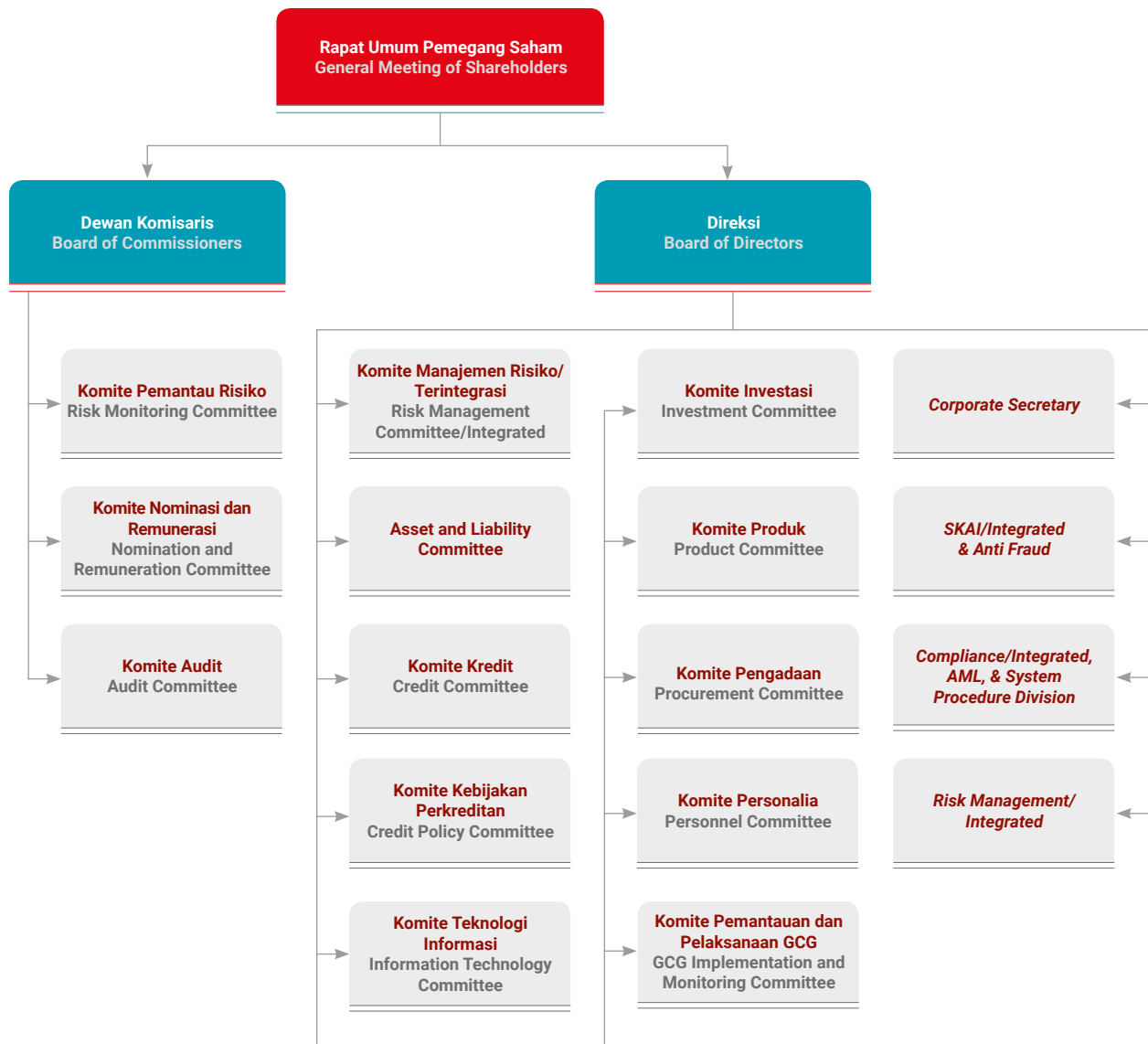
The Commitment to implement GCG at Bank Victoria starts from internalizing various laws and regulations underlying GCG implementation in the rules and regulations established by the Bank, which becomes the roots in the Bank's Vision, Mission, and Cultural Value. This is followed by the commitment of the Bank's governance organs, which include the General Meeting of Shareholders (GMS), the Board of Commissioners, and the Board of Directors, along with their respective supporting organs, to play their roles in accordance with the agreed regulations. Each of the organ's role is carried out based on GCG principles in order to achieve good corporate sustainability.

## Struktur dan Pedoman GCG

### GCG Structures and Guidelines

Struktur tata kelola Bank Victoria disusun berdasarkan Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas. Penyusunan struktur tata kelola bertujuan untuk menjamin pelaksanaan prinsip-prinsip tata kelola perusahaan dapat berjalan dengan efektif dengan peran dan tanggung jawab yang jelas sehingga tercipta mekanisme kontrol *check and balance*.

Bank Victoria's governance structure was established based on Law No. 40 of 2007 on Limited Liability Company. The establishment of governance structure is aimed to ensure the effective implementation of good corporate governance and ensuring clarity in the distribution of duties and responsibilities, and thus, check and balance control mechanism is established.





Pelaksanaan peran masing-masing organ pada struktur tata kelola berpedoman pada peraturan yang berlaku di Bank Victoria, meliputi:

1. Pedoman Kode Etik Perilaku Karyawan yang ditetapkan berdasarkan Surat Keputusan Direksi No. 001/SK-DIR/01/21 tanggal 11 Januari 2021;
2. Kebijakan dan Standar Operasional Prosedur Penerapan Strategi Anti *Fraud* yang ditetapkan dalam Surat Keputusan Direksi No. 002/SK-DIR/08/20 tanggal 7 Agustus 2020;
3. Kebijakan *Good Corporate Governance* (GCG) yang telah disahkan melalui Keputusan Direksi No. 009/SK-DIR/02/16 tanggal 24 Februari 2016;
4. *Board of Commissioners Charter* (BOC Charter) yang telah disahkan melalui Surat Keputusan Dewan Komisaris No. 001/SK-KOM/01/20 tanggal 10 Januari 2020;
5. *Board of Directors Charter* (BOD Charter) yang telah disahkan melalui Surat Keputusan Direksi No. 002/SK-DIR/05/19 tanggal 2 Mei 2019;
6. Piagam dan Pedoman Kerja Komite Audit yang telah disahkan melalui Surat Keputusan Dewan Komisaris No. 004/SK-KOM/09/18 tanggal 21 September 2018;
7. Pedoman Komite Nominasi dan Remunerasi yang telah disahkan melalui Surat Keputusan Dewan Komisaris No. 003/SK-KOM/09/18 tanggal 20 September 2018;
8. Piagam dan Pedoman Kerja Komite Pemantau Risiko yang telah disahkan melalui Surat Keputusan Dewan Komisaris No. 001/SK-KOM/12/17 tanggal 8 Desember 2017;
9. Pedoman dan Tata Tertib Komite Manajemen Risiko Grup Keuangan Victoria yang ditetapkan berdasarkan Surat Keputusan Direksi No. 002/SK-DIR/08/21 tanggal 20 Agustus 2021;
10. Pedoman dan Tata Tertib Kerja *Integrated Governance Committee* yang ditetapkan berdasarkan Surat Keputusan Direksi No. 006/SK-DIR/06/17 tanggal 20 Juni 2017; serta
11. Kebijakan dan *Standard Operating Procedure* (SOP).

Pedoman-pedoman tersebut ditujukan untuk melengkapi kebijakan pendukung dalam penerapan GCG, menjadi pedoman bagi Bank dalam menjalankan aktivitas sehari-hari sesuai dengan budaya yang diharapkan, serta menjadi bentuk komitmen tertulis bagi seluruh jajaran dan tingkatan organisasi Bank dalam rangka meningkatkan disiplin dan tanggung jawab organ perusahaan dalam rangka menjaga kepentingan *stakeholders* sesuai dengan tanggung jawab masing-masing. Pedoman-pedoman tersebut juga senantiasa dievaluasi dan dimutakhirkan secara berkala untuk menjaga kesesuaiannya dengan perubahan peraturan dan perundang-undangan yang berlaku.

The execution of each organ's role in the corporate governance structure is guided by the regulations applicable at Bank Victoria, among others:

1. Employee Ethics Guidelines stipulated in the Board of Directors' Decision Letter No. 001/SK-DIR/01/21 dated 11 January 2021;
2. Policy and Standard Operating Procedure for Implementing Anti-Fraud Strategy stipulated in Board of Directors' Decision Letter No. 002/SK-DIR/08/20 dated 7 August 2020;
3. Good Corporate Governance (GCG) Policy, validated through Board of Directors' Decision Letter No. 009/SK-DIR/02/16 dated 24 February 2016;
4. Board of Commissioners Charter (BOC Charter), approved under the Board of Commissioners' Decision Letter No. 001/SK-KOM/01/20 dated 10 January 2020;
5. Board of Directors Charter (BOD Charter), approved under Board of Directors' Decision Letter No. 002/SK-DIR/05/19 dated 2 May 2019;
6. Charter and Working Guidelines of Audit Committee, approved under Board of Commissioners' Decision Letter No. 004/SK-DIR/09/18 dated 21 September 2018;
7. Nomination and Remuneration Committee Charter, approved under the Board of Commissioners' Decision Letter No. 003/SK-KOM/09/18 dated 20 September 2018;
8. Charter and Working Guidelines of Risk Monitoring Committee, validated through Board of Commissioners' Decision Letter No. 001/SK-KOM/12/17 dated 8 December 2017;
9. Guidelines and Procedures of Risk Management Committee of Victoria Financial Group stipulated under Board of Directors' Decision Letter No. 002/SK-DIR/08/21 dated 20 August 2021;
10. Guidelines and Procedures of Integrated Governance Committee stipulated under Board of Directors' Decision Letter No. 006/SK-DIR/06/17 dated 20 June 2017; and
11. Policy and Standard Operating Procedure (SOP).

These guidelines aim to supplement the supporting policies in implementing GCG, serve as guidelines for the Bank in carrying out its daily activities in accordance with the expected corporate culture, and serve as a form of written commitment of all ranks and levels of the Bank's organization in order to improve discipline and organs' responsibility and safeguard stakeholders' interests according to their respective responsibilities. These guidelines are evaluated and updated periodically to ensure their compliance with the amendments to the applicable laws and regulations.

## Corporate Governance Framework

### Corporate Governance Framework

Pelaksanaan GCG bersifat menyeluruh dan mencakup seluruh aspek pengelolaan usaha Bank. Terkait hal tersebut, Bank menyusun *Corporate Governance Framework* agar implementasi GCG berjalan efektif. Seluruh insan Bank, baik itu RUPS, Dewan Komisaris, Direksi, organ tata kelola pendukung, dan seluruh karyawan Bank bertanggung jawab untuk melaksanakan *Corporate Governance Framework* Bank. Adapun skema *Corporate Governance Framework* Bank Victoria sebagai berikut.

GCG Implementation is comprehensive and covers all of the Bank's business management aspects. In relation thereto, the Bank prepares Corporate Governance Framework for effective GCG implementation. All of Bank's personnel, which include the GMS, the Board of Commissioners, the Board of Directors, supporting governance organs, and all of the Bank's employees are responsible for carrying out the Bank's Corporate Governance Framework. The Corporate Governance Framework of Bank Victoria is shown in the following scheme.

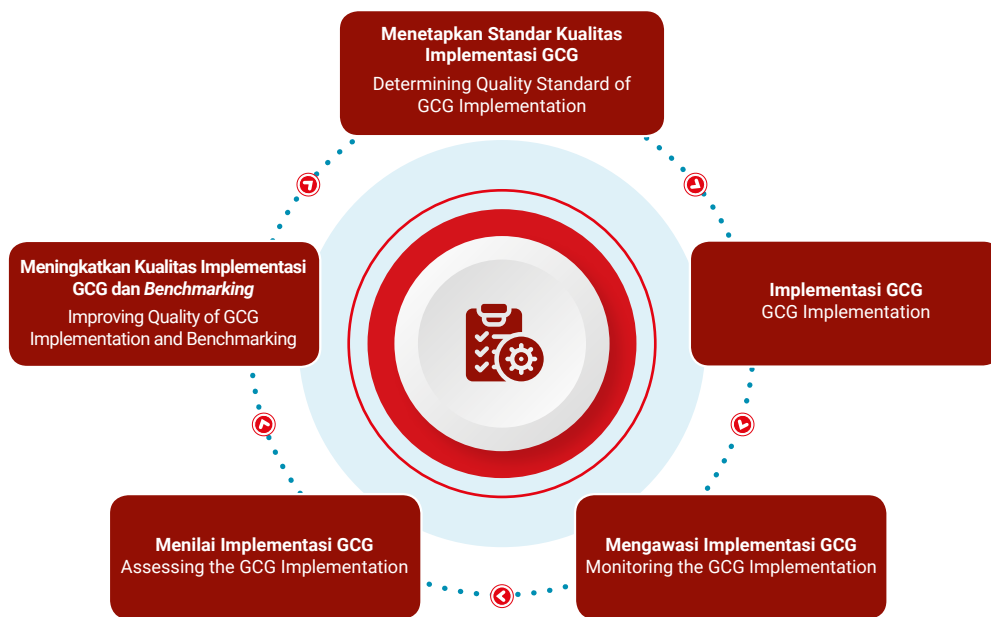




## Mekanisme Implementasi GCG GCG Implementation Mechanism

Mekanisme pelaksanaan GCG Bank Victoria ditetapkan dengan mempertimbangkan praktik-praktik terbaik yang pernah dilakukan di industri perbankan. Hal tersebut bertujuan agar pelaksanaan GCG di Bank Victoria lebih terarah dan dapat mencapai tujuan implementasi jangka panjang, yaitu *Good Corporate Sustainability*. Skema mekanisme implementasi GCG di Bank Victoria sebagai berikut.

Bank Victoria's GCG implementation mechanism is established by considering the best practices carried forward in the banking industry. This is intended so that GCG implementation at Bank Victoria is more focused and can achieve long-term implementation goal, which is *Good Corporate Sustainability*. Below is the scheme of GCG implementation mechanism at Bank Victoria.



### Penetapan Standar Kualitas Implementasi GCG

Guna mengukur kualitas penerapan GCG di lingkungan Bank, Bank Victoria menetapkan standar ketentuan minimum yang harus diupayakan pemenuhannya. Standar ditetapkan dengan mempertimbangkan perkembangan Bank, input dari pemangku kepentingan, hasil penilaian, dan *benchmarking* pada industri perbankan yang berada di kelas BUKU II.

Bank Victoria menetapkan salah satu standar kualitas implementasi GCG adalah dengan memenuhi Peraturan Otoritas Jasa Keuangan No. 4/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum. Berdasarkan ketentuan tersebut, pencapaian tingkat kesehatan Bank berdasarkan penilaian sendiri GCG minimum pada kategori "Baik" dan berdasarkan pendekatan risiko minimum pada kategori "Low to Moderate". Selain itu, Bank menetapkan standar lain yang mengacu pada Peraturan Otoritas Jasa Keuangan No. 21/POJK.04/2015

### Determining the Quality Standard of GCG Implementation

In order to measure the GCG implementation quality within Bank Victoria, the Bank established minimum standard to be fulfilled. The standard is established by considering the Bank's development, input from stakeholders, assessment results, and benchmark in the banking industry in BUKU II class.

Bank Victoria established one standard quality of GCG implementation by complying with the Financial Services Authority Regulation No. 4/POJK.03/2016 on Assessment of Sound Level of Commercial Banks. Based on these provisions, the achievement of the Bank's soundness level is based on a GCG self-assessment that at minimum is in the "Good" category and based on the minimum risk approach in the "Low to Moderate" category. In addition, the Bank established another standard by referring to the Financial Services Authority Regulation

tentang Penerapan Pedoman Tata Kelola Perusahaan Terbuka. Ketentuan tersebut berisi pemenuhan hubungan dengan Pemegang Saham dalam menjamin hak-hak Pemegang Saham, pelaksanaan fungsi dan peran Dewan Komisaris dan Direksi, peningkatan partisipasi pemangku kepentingan, serta peningkatan pelaksanaan keterbukaan informasi.

## Pelaksanaan dan Pemantauan Implementasi GCG

Seluruh insan Bank memiliki kewajiban untuk memenuhi standar kualitas implementasi GCG dengan tanggung jawab utama berada di bawah koordinasi Dewan Komisaris dan Direksi. Komite Pemantau dan Pelaksanaan GCG juga memantau pelaksanaan implementasi GCG untuk memastikan kebenaran pelaksanaan implementasi GCG. Berikut peran Komite Pemantau dan Pelaksanaan GCG dalam mengawasi pemenuhan standar kualitas implementasi GCG di Bank.

1. Mengawasi dan menganalisa setiap kebijakan terbaru maupun praktik terbaik terkait penerapan GCG;
2. Memutakhirkan/menyempurnakan kebijakan internal (*existing*) terhadap setiap perubahan kebijakan GCG;
3. Memantau rencana dan realisasi/pencapaian bisnis Bank melalui rapat-rapat Komite secara berkala;
4. Menetapkan aspek dan *person in charge* dalam penyusunan GCG sesuai dengan bidang yang tercermin dari aspek-aspek GCG;
5. Mengoordinir penyusunan laporan pelaksanaan GCG; serta
6. Melakukan penyusunan pelaporan pelaksanaan GCG Bank dan melakukan penilaian secara mandiri sesuai ketentuan yang berlaku.

## Penilaian GCG

Penilaian GCG dilakukan untuk memperbaiki dan meningkatkan kualitas implementasi GCG pada berbagai aspek yang diukur, Bank melakukan penilaian GCG sebagai mekanisme *check and balance* guna mengukur kekuatan dan kelemahan implementasi GCG yang sedang berjalan di Bank. Pelaksanaan penilaian GCG secara mandiri (*self assessment*) setiap tahun buku di Bank berdasarkan pada Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 dan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum dan Peraturan Otoritas Jasa Keuangan, serta Peraturan Otoritas Jasa Keuangan No. 4/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum. Penilaian sendiri ini dimaksudkan untuk memetakan kekuatan dan kelemahan pelaksanaan GCG di Bank yang ditinjau dari 3 (tiga) aspek, yaitu *governance structure*, *governance process*, dan *governance outcome*.

No. 21/POJK/04/2015 on Implementation of Governance Guidelines for Public Companies. The regulation sets out the fulfillment of relationship with Shareholders in guaranteeing the Shareholders rights, the implementation of functions and roles of the Board of Commissioners and Board of Directors, and the improved implementation of information transparency.

## GCG Implementation and Monitoring

The entire personnel of the Bank must meet the GCG implementation quality standard, and the main responsibility is under the coordination of the Board of Commissioners and the Board of Directors. GCG Implementation and Monitoring Committee also oversees the GCG implementation to ensure that the GCG is implemented appropriately. The following are the roles of the GCG Implementation and Monitoring Committee in supervising the fulfillment of the GCG implementation quality standard at the Bank.

1. Monitoring and analyzing any latest policy and best practices related to GCG implementation;
2. Updating/refining the existing internal policies against any changes in GCG policy;
3. Periodically monitoring the Bank's plans and realizations/business achievements through Committee meetings;
4. Determining aspects and person in charge in preparing GCG in accordance with the areas reflected in GCG aspects;
5. Coordinating the preparation of GCG implementation reports; and
6. Preparing the Bank's GCG implementation report and conducting self-assessment in accordance with the prevailing provisions.

## GCG Assessment

GCG is assessed in order to improve and enhance the GCG implementation quality in various aspects measured. The Bank assesses GCG as a check and balance mechanism in order to measure the strengths and weaknesses of the Bank's ongoing GCG implementation. The execution of annual GCG self-assessment at the Bank is based on Financial Services Authority Regulation No. 55/POJK.03/2016 and Financial Services Authority Circular No. 13/SEOJK.03/2017 on the Implementation of Governance for Commercial Banks and Financial Services Authority Regulation No. 4/POJK.03/2016 on Assessment of Sound Level of Commercial Banks. This self-assessment is intended to be a strength and weakness mapping of the GCG implementation at the Bank, as reviewed from 3 (three) aspects, i.e., *governance structure*, *governance process*, and *governance outcome*.

Faktor-faktor yang dinilai dalam penilaian GCG sendiri meliputi: Factors assessed in the GCG self-assessment include:

Faktor Penilaian Assessment Factor	Pelaksanaan Penilaian Assessment Implementation
Pelaksanaan tugas dan tanggung jawab Dewan Komisaris Implementation of duties and responsibilities of the Board of Commissioners	Bank memastikan terselenggaranya pelaksanaan GCG melalui peran pengawasan yang aktif dan efektif, serta memberi masukan/rekomendasi kepada Direksi untuk kepentingan Bank, sesuai dengan ukuran dan kompleksitas usaha Bank. The Bank ensures GCG implementation through an active and effective supervisory role, and provides input/recommendation to the Board of Directors for the Bank's interest, in accordance with the Bank's business size and complexity.
Pelaksanaan tugas dan tanggung jawab Direksi Implementation of duties and responsibilities of the Board of Directors	Bank memastikan bahwa operasional dan usaha Bank telah diwujudkan dalam pelaksanaan tugas dan tanggung jawab yang berjalan sangat efektif. The Bank ensures that Bank's operations and business are realized in the implementation of highly effective duties and responsibilities.
Kelengkapan dan pelaksanaan tugas komite Completeness and implementation of duties of the committees	Bank memastikan telah memiliki semua komite yang dipersyaratkan sesuai ketentuan regulator, serta telah melaksanakan fungsi dan tugasnya secara optimal dan efektif dalam memberikan rekomendasi yang digunakan sebagai acuan Dewan Komisaris. The Bank ensures that it has all the required Committees in accordance with the regulators' requirements, and that they have performed their functions and duties optimally and effectively in providing recommendations used as references by the Board of Commissioners.
Penanganan benturan kepentingan Management of conflict of interest	Bank memastikan telah memiliki kebijakan dan prosedur penanganan benturan kepentingan dengan tujuan agar setiap tindakan insan Bank tidak merugikan dan tidak mengurangi keuntungan Bank, serta agar setiap keputusan terdokumentasikan dengan baik, dilengkapi dengan risalah rapat. The Bank ensures that policies and procedures to manage conflict of interest are in place, in order to ensure that any action taken by the Bank's employees is not detrimental and does not harm the Bank's profits, and that any decision is properly documented and complemented by the minutes of meetings.
Penerapan fungsi kepatuhan Implementation of compliance function	Bank memastikan terus dilakukannya penerapan fungsi kepatuhan terhadap aktivitas operasional maupun terhadap pengembangan usaha Bank agar senantiasa sesuai dengan ketentuan yang berlaku, serta meminimalisasi pelanggaran. The Bank ensures continuous implementation of compliance function to the operational activities as well as to the Bank's business development in order to always comply with the prevailing provisions and to minimize violations.
Penerapan fungsi audit internal Implementation of internal audit function	Bank memastikan pelaksanaan fungsi audit internal telah berjalan lebih efektif, independen dan objektif, serta senantiasa berpedoman pada standar yang ditetapkan dalam Penerapan Fungsi Audit Intern Bank (PFAIB). The Bank ensures that the implementation of internal audit function has been performed more effectively, independently, and objectively, and always complies with the standards set forth in Bank's Internal Audit Function Implementation (PFAIB).
Penerapan fungsi audit eksternal Implementation of external audit function	Bank memastikan pelaksanaan fungsi audit eksternal berjalan secara independen dan telah sangat efektif, sesuai dengan persyaratan yang ditetapkan dalam ketentuan, dengan menghasilkan kualitas dan cakupan hasil audit yang sangat baik. The Bank ensures the implementation of external audit function runs independently and highly effective, in accordance with the requirements specified in the provisions, by producing excellent quality and coverage of audit results.
Penerapan manajemen risiko, termasuk sistem pengendalian intern Implementation of risk management, including internal control system	Bank memastikan pelaksanaan fungsi manajemen risiko telah lebih efektif serta melakukan peran dan fungsinya dalam sistem pengendalian intern yang lebih komprehensif, seperti melakukan pemutakhiran kebijakan, prosedur dan penetapan limit sesuai dengan regulasi, tujuan, ukuran, dan kompleksitas usaha Bank. The Bank ensures that the implementation of risk management functions has been more effective and performs its roles and functions in a more comprehensive internal control system, such as updating policies and procedures, specifying the limits in accordance with the Bank's regulations, objectives, size, and complexity.
Penyediaan dana kepada pihak terkait dan penyediaan dana besar Provision of fund to related party and provision of large exposure	Bank memastikan telah dimilikinya kebijakan tertulis mengenai penyediaan dana kepada pihak terkait dan penyediaan dana besar, tidak terdapat pelanggaran maupun pelampauan BMPK, diversifikasi penyediaan dana yang cukup merata, serta pengambilan keputusan dalam penyediaan dana dilakukan secara independen. The Bank ensures that written policies on provision of funds to related parties and large exposure are in place, there are no violations no excess of LLL, there is equitable diversification of provision of funds, and that decisions on fund provisions are made independently.
Transparansi kondisi keuangan dan non-keuangan Bank, Laporan Pelaksanaan GCG, dan Pelaporan Internal Transparency of the Bank's financial and non-financial condition, GCG Implementation Report, and Internal Reporting	Bank memastikan telah transparan dalam menyampaikan informasi keuangan maupun non-keuangan kepada publik secara tepat waktu, lengkap, akurat, mutakhir dan utuh, termasuk penyampaian laporan pelaksanaan GCG kepada Pemegang Saham dan pemangku kepentingan lainnya, dengan didukung Sistem Informasi Manajemen Bank yang mampu menyediakan data dan informasi untuk pengambilan keputusan manajemen. The Bank ensures that it has been transparent in delivering financial and non-financial information to the public in a timely, complete, accurate, updated, and complete manner, including the submission of GCG implementation report to the Shareholders and other stakeholders, supported by the Bank's Management Information System having the capability of providing data and information for management's decision-making.

Faktor Penilaian Assessment Factor	Pelaksanaan Penilaian Assessment Implementation
Rencana strategis Bank The Bank's strategic plans	Bank memastikan penyusunan Rencana Bisnis Bank (RBB) telah dilakukan dengan realistis dan telah memperhatikan faktor eksternal dan internal, prinsip <i>prudent</i> , serta asas perbankan yang sehat dan sesuai dengan Visi, Misi, dan rencana korporasi Bank.  The Bank ensures that the Bank Business Plan (RBB) has been prepared realistically and has taken into consideration the external and internal factors, prudent principles, sound banking principles, and in line with the Bank's Vision, Mission, and corporate plan.

## Hasil Penilaian Sendiri serta Tindak Lanjutnya

Berikut hasil penilaian sendiri GCG Bank dalam 5 (lima) tahun terakhir.

## Self-Assessment Results and the Follow-up

The following are the Bank's GCG self-assessment results for the past 5 (five) years.

Aspek Aspect	Nilai Score				
	2021	2020	2019	2018	2017
Pelaksanaan Tugas dan Tanggung Jawab Direksi Implementation of Duties and Responsibilities of the Board of Directors	2	2	2	1	2
Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris Implementation of Duties and Responsibilities of the Board of Commissioners	2	2	1	2	1
Kelengkapan dan Pelaksanaan Tugas Komite Completeness and Implementation of the Committee's Duties	2	3	2	2	2
Penanganan Benturan Kepentingan Management of Conflict of Interest	1	2	1	1	1
Penerapan Fungsi Kepatuhan Implementation of Compliance Function	2	3	2	2	2
Penerapan Fungsi Audit Internal Implementation of Internal Audit Function	2	3	2	2	2
Penerapan Fungsi Audit Eksternal Implementation of External Audit Function	2	2	2	2	2
Penerapan Manajemen Risiko, termasuk Sistem Pengendalian Internal Implementation of Risk Management, including Internal Control System	2	3	2	2	2
Penyediaan Dana kepada Pihak Terkait ( <i>Related Party</i> ) dan Penyediaan Dana Besar ( <i>Large Exposure</i> ) Provision of Fund to Related Party and Provision of Large Exposure	2	3	2	2	2
Transparansi Kondisi Keuangan dan Non-Keuangan Bank, Laporan Pelaksanaan GCG, dan Pelaporan Internal Transparency of the Bank's Financial and Non-Financial Condition, GCG Implementation Report, and Internal Reporting	1	2	1	1	1
Rencana Strategis Bank Bank's Strategic Plans	2	3	2	2	2
<b>Skor Penilaian Sendiri GCG Bank Victoria</b> <b>Bank Victoria's GCG Self Assessment Score</b>	<b>2</b>	<b>3</b>	<b>2</b>	<b>2</b>	<b>2</b>
<b>Kategori</b> <b>Category</b>	<b>Baik</b> <b>Good</b>	<b>Cukup Baik</b> <b>Fair</b>	<b>Baik</b> <b>Good</b>	<b>Baik</b> <b>Good</b>	<b>Baik</b> <b>Good</b>
<b>Skor Penilaian Sendiri GCG Bank Victoria Syariah</b> <b>Bank Victoria Syariah's GCG Self Assessment Score</b>	<b>1.55</b>	<b>2.55</b>	<b>1.63</b>	<b>1.56</b>	<b>1.62</b>
<b>Kategori</b> <b>Category</b>	<b>Baik</b> <b>Good</b>	<b>Cukup Baik</b> <b>Fair</b>	<b>Baik</b> <b>Good</b>	<b>Baik</b> <b>Good</b>	<b>Baik</b> <b>Good</b>

Pada tahun 2021, hasil penilaian sendiri Bank memperoleh kategori "Baik" dengan rincian sebagai berikut.

In 2021, the Bank's self-assessment results obtained "Good" category with the following details.

Indikator Indicator	Peringkat Rating	Definisi Peringkat Rating Definition
Individu Individual	2	Bank telah melakukan penerapan GCG yang secara umum Baik, tercermin dari penerapan terhadap 11 (sebelas) aspek yang telah dituangkan dalam analisis. The Bank has implemented GCG, which in general is Good, as reflected in the implementation of the 11 (eleven) aspects outlined in the analysis.
Konsolidasian Consolidated	2	Secara konsolidasi, yaitu Bank Victoria International (konvensional) dan Bank Victoria Syariah telah melakukan penerapan GCG yang secara umum Baik, tercermin dari masing-masing organisasi telah melakukan penerapan terhadap 11 (sebelas) aspek yang telah dituangkan dalam analisis. In a consolidation manner, Bank Victoria International (conventional) and Bank Victoria Syariah have implemented GCG, which in general is Good, as reflected in each organization that has implemented 11 (eleven) aspects outlined in the analysis.

Analisis kesesuaian pelaksanaan penilaian sendiri GCG Bank Victoria secara individu dengan 3 (tiga) aspek, yaitu *governance structure*, *governance process*, dan *governance outcome* untuk setiap kriteria, serta tindak lanjutnya diuraikan sebagai berikut.

Analysis of implementation conformance on Bank Victoria's individual GCG self-assessment with 3 (three) aspects, i.e. *governance structure*, *governance process*, and *governance outcome* for each criterion, including the follow-up are as described hereinbelow.

**Aspek Pelaksanaan Tugas dan Tanggung Jawab Direksi**  
**Aspect of Implementation of Duties and Responsibilities of the Board of Directors**

Nilai Score	2
Analisis Analysis	<p><b>Governance Structure:</b></p> <ul style="list-style-type: none"> <li>Jumlah anggota Direksi berdasarkan Akta Berita Acara Rapat Umum Pemegang Saham Tahunan No. 19 tanggal 10 Mei 2019 terdiri dari 5 (lima) orang, yaitu Direktur Utama, Wakil Direktur Utama, 2 (dua) Direktur Bidang, serta Direktur Kepatuhan dan Manajemen Risiko;</li> <li>Setiap Direksi tidak memiliki hubungan keluarga sampai dengan derajat kedua maupun keuangan dengan anggota Direksi lainnya dan/atau anggota Komisaris;</li> <li>Direksi tidak memiliki jabatan rangkap sebagai Komisaris, Direksi, atau Pejabat Eksekutif pada Bank, perusahaan dan/atau lembaga keuangan lainnya, kecuali untuk jabatan lain sebagaimana diperkenankan oleh ketentuan Otoritas Jasa Keuangan; dan</li> <li>Seluruh anggota Direksi telah lulus penilaian kemampuan dan kepatutan dan telah memperoleh surat persetujuan dari Otoritas Jasa Keuangan.</li> </ul> <p>According to Deed of Minutes of Annual General Meeting of Shareholders No. 19 dated 10 May 2019, the Board of Directors consists of 5 (five) members, namely President Director, Deputy President Director, 2 (two) Divisional Directors, and Director of Compliance and Risk Manager;</p> <ul style="list-style-type: none"> <li>Each member of Board of Directors does not have any family relationship up to the second degree, nor do they have any financial relation with other members of Board of Directors and/or Board of Commissioners;</li> <li>Members of Board of Directors have no concurrent position as Commissioner, Director, of Executive Officer at other Banks, companies and/or financial institutions, except for other positions as permitted by the provisions of the Financial Services Authority; and</li> <li>All members of the Board of Directors have passed the fit and proper test and have obtained approval letter from the Financial Services Authority.</li> </ul> <p><b>Governance Process:</b></p> <ul style="list-style-type: none"> <li>Pelaksanaan tugas Direksi mengacu pada pedoman yang telah ditetapkan dan senantiasa memperhatikan dan menerapkan prinsip-prinsip GCG dan ketentuan yang berlaku;</li> <li>Direksi senantiasa memperhatikan arahan/nasihat Dewan Komisaris melalui mekanisme rapat-rapat;</li> <li>Pencapaian rencana bisnis Bank cukup baik. Namun demikian, secara berkesinambungan Direksi senantiasa meningkatkan kinerja Bank dalam memitigasi dampak pandemi Covid-19;</li> <li>Direksi dibantu oleh beberapa Komite di bawah Direksi serta unit-unit terkait dalam melaksanakan tugas-tugasnya; dan</li> <li>Direksi telah mengambil kebijakan dan keputusan strategis melalui mekanisme rapat Direksi, tercermin selama Juli sampai dengan Desember 2021 telah melakukan rapat sebanyak 26 kali dan 6 (enam) kali rapat gabungan dengan Dewan Komisaris.</li> </ul> <p>The implementation of the Board of Directors' duties refers to the established Guidelines and always observes and applies the GCG principles and applicable provisions;</p> <ul style="list-style-type: none"> <li>The Board of Directors always observes the direction/advice from the Board of Commissioners through meetings mechanism;</li> <li>The achievement of the Bank's Business Plan is satisfactory. Nevertheless, the Board of Directors continuously improve the Bank's performance in mitigating the impact of Covid-19 pandemic;</li> <li>The Board of Directors is assisted by several Board of Directors' Subordinate Committees and related Units in carrying out its duties; and</li> <li>The Board of Directors has taken strategic policies and decisions through the Board of Directors' meetings mechanism, as reflected from July to December 2021 by holding 25 (twenty-five) meetings and 6 (six) joint meetings with the Board of Commissioners.</li> </ul> <p><b>Governance Outcome:</b></p> <p>Bank dapat memenuhi kewajiban yang ditetapkan regulator. The Bank was able to meet all obligations set out by the regulator.</p>

### Aspek Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris

#### Aspect of Implementation of Duties and Responsibilities of the Board of Commissioners

Nilai Score	2
Analisis Analysis	<p><b>Governance Structure:</b></p> <ul style="list-style-type: none"> <li>Berdasarkan Akta Berita Acara Rapat Umum Pemegang Saham Tahunan No. 19 tanggal 10 Mei 2019, jumlah anggota Dewan Komisaris telah memenuhi ketentuan, yaitu terdiri dari 3 (tiga) orang dan tidak melampaui jumlah Direksi yaitu 5 (lima) orang;</li> <li>Anggota Dewan Komisaris telah memenuhi jumlah, komposisi, kriteria dan independensi serta kompetensi sesuai ketentuan Otoritas Jasa Keuangan;</li> <li>Anggota Dewan Komisaris adalah independen, telah memenuhi kriteria independensi dari Peraturan Otoritas Jasa Keuangan, dan seluruh anggota Dewan Komisaris telah lulus penilaian kemampuan dan kepatutan serta telah memperoleh surat persetujuan dari Otoritas Jasa Keuangan;</li> <li>Anggota Dewan Komisaris tidak memiliki hubungan keuangan, hubungan kepengurusan, hubungan kepemilikan, dan hubungan keluarga dengan anggota Dewan Komisaris lainnya, anggota Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan untuk bertindak independen; dan</li> <li>Dewan Komisaris tidak ada yang merangkap jabatan sebagai anggota Dewan Komisaris, Direksi, atau Pejabat Eksekutif pada lembaga keuangan lain, kecuali terhadap hal-hal yang telah ditetapkan dalam Peraturan Otoritas Jasa Keuangan.</li> <li>Based on Deed of Minutes of Annual General Meeting of Shareholders No. 19 dated 10 May 2019, the number of Board of Commissioners members has complied with the requirements, which is 3 (three) members and not exceeding the total number of Board of Directors members, which is 5 (five) members;</li> <li>Members of Board of Commissioners have met the number, composition, criteria, independence, and competence in accordance with the provisions of the Financial Services Authority;</li> <li>Members of Board of Commissioners are independent, have fulfilled the independence criteria of the Financial Services Authority Regulations and all members of Board of Commissioners have passed the fit and proper test and have obtained an approval letter from the Financial Services Authority;</li> <li>Members of Board of Commissioners have no financial, management, ownership, and family relationship with other members of Board of Commissioners, members of Board of Directors, and/or Controlling Shareholders, as well as relationship with the Bank that may influence their ability to act independently; and</li> <li>None of the Board of Commissioners' members is holding concurrent position as a member of Board of Commissioners, Board of Directors, or Executive Officers of other financial institutions, except for matters stipulated in the Financial Services Authority Regulations.</li> </ul> <p><b>Governance Process:</b></p> <ul style="list-style-type: none"> <li>Dewan Komisaris telah melakukan pengawasan terhadap kinerja Direksi, dengan mekanisme melalui rapat-rapat;</li> <li>Selama semester I, telah dilakukan rapat Dewan Komisaris sebanyak 3 (tiga) kali, 6 (enam) kali rapat gabungan dengan Direksi, dan rapat Direktorat dengan Dewan Komisaris sebanyak 3 (tiga) kali. Seluruh rapat tersebut telah dituangkan dalam risalah rapat dan didokumentasikan dengan baik;</li> <li>Pelaksanaan tugas Dewan Komisaris mengacu pada pedoman yang telah ditetapkan serta sangat memperhatikan prinsip-prinsip GCG dan ketentuan yang berlaku;</li> <li>Dewan Komisaris telah memberikan arahan dan nasihat kepada Direksi dalam proses pencapaian target yang telah ditetapkan dalam Rencana Bisnis Bank; dan</li> <li>Dewan Komisaris dibantu oleh Komite-Komite yang berada di bawah Dewan Komisaris dalam melaksanakan tugas-tugasnya.</li> <li>The Board of Commissioners has supervised the Board of Directors' performance through meetings mechanism;</li> <li>In the 1st Semester, the Board of Commissioners held 3 (three) meetings, 6 (six) joint meetings with the Board of Directors, and 3 (three) Directorate meetings with the Board of Commissioners. All of the meetings were set out in the minutes of meetings and they were appropriately documented;</li> <li>The implementation of the Board of Commissioners' duties refers to the established guidelines and highly observes the GCG principles and the applicable regulations;</li> <li>The Board of Commissioners has provided direction or advice to the Board of Directors in the process of achieving targets defined in the Bank's Business Plan; and</li> <li>In performing its duties, the Board of Commissioners is assisted by the Board of Commissioners' Subordinate Committees.</li> </ul> <p><b>Governance Outcome:</b></p> <p>Pengarahan atau nasihat dari Dewan Komisaris telah dibahas dalam rapat dan dituangkan dalam risalah rapat. Direction or advice from the Board of Commissioners was discussed in meetings and set forth in the minutes of meeting.</p>

### Aspek Kelengkapan dan Pelaksanaan Tugas Komite

#### Aspect of Completeness and Implementation of the Committee's Duties

Nilai Score	2
Analisis Analysis	<p><b>Governance Structure:</b></p> <ul style="list-style-type: none"> <li>Komposisi dan kompetensi anggota Komite telah sesuai dengan ukuran dan kompleksitas usaha Bank; dan</li> <li>Anggota Komite Bank yang berasal dari pihak independen tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham, dan/atau keluarga dengan anggota Dewan Komisaris lainnya, Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank yang dapat mempengaruhi independensi anggota Komite.</li> <li>Composition and competency of the Committee's members are already in accordance with the Bank's business size and complexity; and</li> <li>All members of the Bank's Committees who are from independent parties do not have financial, management, shareholding, and/or family relationships with other member of Board of Commissioners, Board of Directors, and/or Controlling Shareholders or relationship with the Bank, which may affect the independence of the Committee's members.</li> </ul> <p><b>Governance Process:</b></p> <ul style="list-style-type: none"> <li>Komite bertugas dan bertanggung jawab untuk memberikan pendapat yang profesional dan independen kepada Dewan Komisaris terhadap laporan atau hal-hal yang disampaikan oleh Direksi kepada Dewan Komisaris;</li> <li>Melaksanakan tugas-tugas lain yang berkaitan dengan tugas Dewan Komisaris;</li> <li>Melalui mekanisme rapat-rapat, Komite serta unit-unit terkait lainnya telah membahas berbagai hal serta hasilnya dituangkan dalam risalah rapat yang akan ditindaklanjuti oleh masing-masing unit terkait; dan</li> <li>Selama tahun 2021, Komite Audit telah melakukan rapat sebanyak 5 (lima) kali dan Komite Pemantau Risiko telah melakukan rapat sebanyak 4 (empat) kali.</li> </ul>



- The Committee's duties and responsibilities are to provide independent and professional opinion to the Board of Commissioners on reports or matters submitted by the Board of Directors to the Board of Commissioners;
- Carrying out other duties related to the duties of the Board of Commissioners;
- Through meetings mechanism, the Committees and other related Units discussed various matters and the results were then outlined in minutes of meetings for following up by each related Unit; and
- Throughout 2021, the Audit Committee held 5 (five) meetings and the Risk Monitoring Committee held 4 (four) meetings.

**Governance Outcome:**

- Masing-masing Komite senantiasa meningkatkan peran aktifnya dalam menindaklanjuti hal-hal yang dibahas dalam rapat Komite;
- Setiap hasil rapat dituangkan dalam risalah rapat oleh pengurus Komite, termasuk pengungkapan apabila ada perbedaan pendapat (*dissenting opinions*) dan didokumentasikan dengan baik; dan
- Komite-Komite telah menjalankan fungsinya sesuai dengan koridor dan mekanisme yang telah ditetapkan dalam pedoman tugas dan tanggung jawabnya meskipun belum sepenuhnya efektif, terutama dalam keadaan luar biasa, yaitu pandemi Covid-19.
- Each Committee continued to enhance its active role in following up issues discussed in the Committee's meetings;
- Each meeting result was set forth in minutes of meeting by the Committee's administrator, including disclosure in case of any dissenting opinions and they were appropriately documented;
- The Committees have carried out their functions in accordance with the corridor and mechanism established in their duties and responsibilities guidelines, eventhough they were not fully effective, especially during extraordinary condition, namely during Covid-19 pandemic.

**Aspek Penanganan Benturan Kepentingan**  
**Aspect of Management of Conflict of Interest**

Nilai Score	1
Analisis Analysis	<p><b>Governance Structure:</b></p> <ul style="list-style-type: none"> <li>• Bank telah memiliki kebijakan dan prosedur dalam penyelesaian benturan kepentingan; dan</li> <li>• Kebijakan telah mengatur secara rinci masing-masing elemen yang mengatur proses, mekanisme, serta personel yang berhak bertindak dalam penyelesaiannya.</li> <li>• The Bank has policies and procedures in place to resolve conflict of interest; and</li> <li>• The policy has regulated in detail each element governing the processes, mechanisms, and personnel who are eligible to act in resolving the conflict of interest.</li> </ul> <p><b>Governance Process:</b></p> <p>Mengutamakan tindakan pencegahan dan selalu meningkatkan budaya pembelajaran dan budaya kepatuhan dalam pelaksanaan tugas dan tanggung jawab dengan tetap menjunjung tinggi profesionalisme.</p> <p>Prioritizing prevention measures and consistently improving learning culture and compliance culture in performing duties and responsibilities by upholding professionalism.</p> <p><b>Governance Outcome:</b></p> <p>Tidak terdapat benturan kepentingan yang dapat merugikan atau mengurangi keuntungan bagi Bank.</p> <p>There was no conflict of interest that was harmful or reducing the Bank's profit.</p>

**Aspek Penerapan Fungsi Kepatuhan**  
**Aspect of Implementation of Compliance Function**

Nilai Score	2
Analisis Analysis	<p><b>Governance Structure:</b></p> <ul style="list-style-type: none"> <li>• Satuan Kerja Kepatuhan independen terhadap Unit Kerja Operasional; dan</li> <li>• Proses pengangkatan, pemberhentian, dan/atau pengunduran diri Direktur yang membawahi fungsi kepatuhan telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan/atau regulator lainnya.</li> <li>• The Compliance Work Unit is independent of the Operational Unit; and</li> <li>• The process of appointment, dismissal, and/or resignation of a Director in charge of compliance unit has complied with the regulation of Bank Indonesia's or Financial Services Authority's and/or other regulators.</li> </ul> <p><b>Governance Process:</b></p> <ul style="list-style-type: none"> <li>• Dalam pelaksanaan tugasnya, Direktur yang membawahi fungsi kepatuhan telah memastikan kepatuhan Bank terhadap ketentuan yang berlaku, serta memantau dan menjaga agar kegiatan usaha Bank tidak menyimpang;</li> <li>• Satuan Kerja Kepatuhan terus menerus melakukan tinjauan ulang serta mengkinikan kebijakan dan prosedur kegiatan operasional Bank, sehingga sesuai dengan ketentuan yang berlaku;</li> <li>• Menindaklanjuti semua komitmen perbaikan audit yang dibuat oleh Bank kepada Otoritas Jasa Keuangan dan lembaga otoritas lain yang berwenang; dan</li> <li>• Menetapkan langkah-langkah konstruktif dalam mencegah atau memitigasi terhadap beberapa risiko yang timbul.</li> <li>• In carrying out duties, the director in charge of compliance ensures the Bank's compliance with the applicable regulations and monitors and prevents the Bank's business activities from deviation;</li> <li>• The Compliance Work Unit constantly reviews and updates the policies and procedures of the Bank's operational activities in order to comply with the prevailing regulations;</li> <li>• Following up all audit improvement commitments made by the Bank to the Financial Services Authority and other authoritative institutions; and</li> <li>• Establishing constructive measures to prevent or mitigate several occurring risks.</li> </ul>



**Governance Outcome:**

- Bank telah melaporkan terkait tugas dan tanggung jawab Direktur yang membawahi Fungsi Kepatuhan sesuai dengan kebijakan regulator dan jangka waktu yang telah ditetapkan; dan
- Bank telah menerapkan prinsip GCG di semua Unit Kerja dan senantiasa fokus terkait dampak atas pelanggaran yang mungkin terjadi, sehingga terus menerus membangun budaya kepatuhan pada masing-masing Unit Kerja.
- The Bank has reported duties and responsibilities of the Director in charge of Compliance Function in accordance with the policies and time frame stipulated by the regulator; and
- The Bank has implemented GCG principles in all Work Units and constantly focusing on the impact of any possible violations, and therefore continuously build the compliance culture in each Work Unit.

### Aspek Penerapan Fungsi Audit Internal Aspect of Implementation of Internal Audit Function

Nilai Score	2
Analisis Analysis	<p><b>Governance Structure:</b></p> <ul style="list-style-type: none"> <li>• Struktur yang dibentuk berdasarkan kebijakan berlaku dan independen terhadap Unit Kerja lain; dan</li> <li>• Telah memiliki Pedoman Audit Intern dan Piagam Internal Audit Intern yang mengacu pada Standar Fungsi Pelaksanaan Audit Intern Bank (SPFAIB).</li> <li>• The structure is established based on prevailing policies and is independent of other Work Units; and</li> <li>• Has Internal Audit Guidelines and Internal Audit Charter in place, which refer to the Standard of the Bank's Internal Audit Implementation Function (SPFAIB).</li> </ul> <p><b>Governance Process:</b></p> <ul style="list-style-type: none"> <li>• Pelaksanaan Fungsi Audit Intern Bank telah berjalan sesuai rencana dan memenuhi pedoman intern sesuai dengan standar minimum yang telah ditetapkan dalam SPFAIB dan SKAI telah menjalankan fungsinya secara independen dan objektif;</li> <li>• SKAI telah melaporkan hasil Audit dan mengawasi tindak lanjut penyelesaiannya; dan</li> <li>• Pelaksanaan kontrol atas transaksi harian secara <i>day to day</i> dilakukan oleh <i>Internal Control</i> dan mengawasi tindak lanjut penyelesaiannya dengan segera.</li> <li>• The implementation of the Bank's Internal Audit Function has run according to the plan and meets the internal guidelines according to the minimum standards specified in PFAIB, and SKAI has performed its functions independently and objectively;</li> <li>• SKAI has reported the audit results and monitored the follow-up of the settlement; and</li> <li>• Controlling daily transactions by day-to-day, which are carried out by Internal Control, and monitoring the follow-up of the settlement immediately.</li> </ul> <p><b>Governance Outcome:</b></p> <ul style="list-style-type: none"> <li>• Laporan telah disampaikan kepada pihak terkait dan diawasi secara berkala tindak lanjutnya; dan</li> <li>• Hasil pemeriksaan dilakukan berdasarkan <i>risk based audit</i>.</li> <li>• Report was submitted to the relevant party and the follow up was monitored periodically</li> <li>• Audit was conducted based on risk based audit.</li> </ul>

### Aspek Fungsi Audit Eksternal Aspect of External Audit Function

Nilai Score	2
Analisis Analysis	<p><b>Governance Structure:</b></p> <p>Penugasan audit kepada akuntan publik telah memenuhi persyaratan yang telah ditetapkan. The assignment of audit to public accountants has met the specified requirements.</p> <p><b>Governance Process:</b></p> <ul style="list-style-type: none"> <li>• Penunjukan akuntan publik telah melalui mekanisme yang diatur dalam kebijakan;</li> <li>• Penunjukan akuntan publik dan kantor akuntan publik telah sesuai dengan rekomendasi dari Komite Audit melalui Dewan Komisaris yang telah mendapat wewenang dari RUPS;</li> <li>• Akuntan publik telah melakukan audit secara independen dan profesional; dan</li> <li>• Akuntan publik telah melaporkan hasil auditnya sesuai dengan waktu dan menyampaikannya kepada pihak-pihak penerima laporan hasil audit.</li> <li>• The appointment of a public accountant has followed the mechanism set forth in the policy;</li> <li>• Appointment of public accountant and public accounting firm has complied with Audit Committee's recommendations through the Board of Commissioners, which has been authorized by the GMS;</li> <li>• Public accountant has conducted audit independently and professionally; and</li> <li>• Public accountant has reported the audit results within specified time and submitted it to the recipients of the audit report.</li> </ul> <p><b>Governance Outcome:</b></p> <ul style="list-style-type: none"> <li>• Pelaksanaan audit oleh akuntan publik senantiasa bertindak objektif dan independen serta sesuai dan telah memenuhi persyaratan terhadap ketentuan yang berlaku; dan</li> <li>• Hasil audit dan <i>management letter</i> telah disampaikan secara tepat waktu kepada Otoritas Jasa Keuangan oleh kantor akuntan publik yang ditunjuk.</li> <li>• Audit conducted by the Public Accountant has always been objective and independent, and is in accordance with and has complied with the applicable terms and conditions; and</li> <li>• Audit results and management letter have been submitted in a timely manner to the Financial Services Authority by the appointed public accounting firm.</li> </ul>

**Aspek Penerapan Manajemen Risiko, termasuk Sistem Pengendalian Internal**  
**Aspect of Risk Management Implementation, including Internal Control System**

Nilai Score	2
Analisis Analysis	<p><b>Governance Structure:</b></p> <ul style="list-style-type: none"> <li>Bank telah memiliki struktur yang memadai dalam mendukung penerapan manajemen risiko dan pengendalian internal; dan</li> <li>Bank telah memiliki kebijakan sebagai pedoman dalam pelaksanaan tugas-tugas Komite.</li> <li>The Bank has an adequate structure in place to support the implementation of risk management and internal control; and</li> <li>The Bank has a policy in place as a guideline in carrying out the duties of the Committee.</li> </ul> <p><b>Governance Process:</b></p> <ul style="list-style-type: none"> <li>Dewan Komisaris dan Direksi telah mengevaluasi dan menyetujui kebijakan yang digunakan sebagai pedoman dalam penerapan manajemen risiko maupun pengendalian internal; dan</li> <li>Mengembangkan dan membangun budaya manajemen risiko termasuk kesadaran risiko pada seluruh jenjang organisasi.</li> <li>The Board of Commissioners and Board of Directors has evaluated and approved the policy to be used as a guideline in implementing risk management and internal control; and</li> <li>Developing and building risk management culture including risk awareness at all organizational levels.</li> </ul> <p><b>Governance Outcome:</b></p> <ul style="list-style-type: none"> <li>Penerapan fungsi manajemen risiko dan pengendalian internal Bank telah sesuai dengan tujuan, kebijakan, ukuran dan kompleksitas usaha, serta risiko yang dihadapi Bank; dan</li> <li>Bank tidak melakukan aktivitas bisnis yang melampaui kemampuan permodalannya.</li> <li>The implementation of the Bank's risk management and internal control functions are already in accordance with the Bank's business objectives, policies, size, and complexity, as well as the risks faced by the Bank; and</li> <li>The Bank does not conduct business activities that exceed its capital capacity.</li> </ul>

**Aspek Penyediaan Dana Kepada Pihak Terkait (Related Party) dan Penyediaan Dana Besar (Large Exposure)**  
**Aspect of Provision of Funds to Related Party and Provision of Large Exposure**

Nilai Score	2
Analisis Analysis	<p><b>Governance Structure:</b></p> <p>Bank telah memiliki kebijakan, sistem, dan prosedur tertulis yang memadai untuk penyediaan dana kepada pihak terkait dan penyediaan dana besar.</p> <p>The Bank has adequate written policies, system and procedures to provide fund to relevant parties and for provision of large exposure.</p> <p><b>Governance Process:</b></p> <ul style="list-style-type: none"> <li>Bank secara berkala telah mengevaluasi dan mengkinikan kebijakan, sistem, dan prosedur;</li> <li>Proses penyediaan dana kepada pihak terkait dan <i>large exposure</i> dipantau dan dikaji oleh beberapa Unit Kerja, termasuk unit yang membawahi kepatuhan; dan</li> <li>Penyediaan dana besar termasuk pelaksanaan restrukturisasi telah menerapkan prinsip kehati-hatian. Perbaikan kualitas kredit yang berpotensi meningkatkan <i>non-performing loan</i> serta peningkatan pengawasan kualitas kredit terus dilakukan.</li> <li>The Bank periodically evaluates and updates procedures, systems and procedures;</li> <li>The process of providing fund to relevant parties and large exposures is monitored and assessed by several Work Units, including the Unit in charge of compliance; and</li> <li>Provision of large exposures including restructuring has implements the principle of prudence. Improvement of the quality of potentially non-performing loans and monitor on credit quality will continue to be tightened.</li> </ul> <p><b>Governance Outcome:</b></p> <p>Tidak terdapat pelanggaran tetapi terdapat pelampauan Batas Maksimum Pemberian Kredit (BMPK) yang disebabkan karena terjadinya penurunan modal Bank (<i>tier 1</i>). Atas pelampauan tersebut, Bank telah melakukan penyelesaian pelampauan Batas Maksimum Pemberian Kredit (BMPK) tersebut dengan mengirimkan surat ke Otoritas Jasa Keuangan dengan Surat No. 051/DIR-EKS/11/21 tanggal 22 November 2021 dan Surat No. 028/DIR-EKS/12/21 tanggal 3 Desember 2021.</p> <p>There were no violations, but Bank Victoria's exceeded its Legal Lending Limit (LLL) due to a decrease in the Bank's capital (Tier 1). In relation to that, the Bank has resolved the exceeded Legal Lending Limit (LLL) by sending a letter to the Financial Services Authority under Ref No. 051/DIR-EKS/11/21 dated 2021 November 2021 and Ref No. 028/DIR-EKS/12/21 dated 3 December 2021.</p>

### Aspek Transparansi Kondisi Keuangan dan Non-Keuangan Bank, Laporan Pelaksanaan GCG, dan Pelaporan Internal Aspect of Transparency of the Bank's Financial and Non-Financial Condition, GCG Implementation Report, and Internal Reporting

Nilai Score	1
Analisis Analysis	<p><b>Governance Structure:</b></p> <ul style="list-style-type: none"> <li>• Bank memiliki kebijakan dan prosedur mengenai tata cara pelaksanaan transparansi kondisi keuangan dan non-keuangan; dan</li> <li>• Bank telah menyusun Laporan Pelaksanaan GCG pada setiap semester dan akhir tahun buku dengan cakupan sesuai ketentuan yang berlaku.</li> <li>• The Bank prepares and presents the reports in the manner, type, and coverage stipulated in Bank Indonesia and/or Financial Services Authority Regulation on The Transparency of Financial Condition; and</li> <li>• The Bank has prepared GCG Implementation Report of which the content and coverage are in accordance with the applicable regulations.</li> </ul> <p><b>Governance Process:</b></p> <ul style="list-style-type: none"> <li>• Bank menyusun dan menyajikan laporan dengan tata cara, jenis, dan cakupan sebagaimana diatur dalam ketentuan Bank Indonesia dan/atau Otoritas Jasa Keuangan tentang transparansi kondisi keuangan; dan</li> <li>• Bank telah menyusun Laporan Pelaksanaan GCG/Tata Kelola dengan isi dan cakupan sesuai dengan ketentuan yang berlaku.</li> <li>• The Bank prepares and presents the reports in the manner, type, and coverage stipulated in Bank Indonesia and/or Financial Services Authority Regulation on The Transparency of Financial Condition; and</li> <li>• The Bank has prepared GCG Implementation Report of which the content and coverage are in accordance with the applicable regulations.</li> </ul> <p><b>Governance Outcome:</b></p> <p>Bank telah menyampaikan informasi keuangan dan non-keuangan secara transparan kepada publik melalui <i>homepage</i> Bank. Informasi keuangan dan non-keuangan disampaikan tepat waktu, lengkap, dan akurat.</p> <p>The Bank has published its financial and non-financial information transparently to the public through the Bank's homepage. Financial and non-financial information was delivered in a timely, complete, and accurate manner.</p>

### Aspek Rencana Strategis Bank Aspect of the Bank's Strategic Plan

Nilai Score	2
Analisis Analysis	<p><b>Governance Structure:</b></p> <p>Rencana strategis Bank telah disusun dalam Rencana Bisnis Bank (<i>Business Plan</i>) sesuai dengan Visi dan Misi Bank. The Bank's strategic plans have been outlined in the Bank's Business Plan according to the Bank's Vision and Mission.</p> <p><b>Governance Process:</b></p> <ul style="list-style-type: none"> <li>• Rencana Bisnis Bank (<i>Business Plan</i>) disusun secara realistis dengan memperhatikan faktor eksternal maupun internal, prinsip kehati-hatian, serta disesuaikan dengan Visi dan Misi Bank;</li> <li>• Direksi telah mengkomunikasikan Rencana Bisnis Bank dengan elemen-elemen terkait;</li> <li>• Direksi telah melaksanakan Rencana Bisnis Bank (<i>Business Plan</i>) secara cukup baik; dan</li> <li>• Rencana strategis Bank telah dikomunikasikan di dalam rapat-rapat Direksi dan Dewan Komisaris.</li> <li>• The Bank's Business Plan (RBB) is prepared realistically by considering the external and internal factors, prudential principles, and adjustments to the Bank's Vision and Mission;</li> <li>• The Board of Directors has communicated the RBB with the relevant elements;</li> <li>• The Board of Directors has implemented RBB adequately; and</li> <li>• The Bank's strategic plans have been communicated during with the Board of Directors and Board of Commissioners.</li> </ul> <p><b>Governance Outcome:</b></p> <ul style="list-style-type: none"> <li>• Rencana Bisnis Bank telah disusun oleh Direksi dan disetujui oleh Dewan Komisaris;</li> <li>• Rencana strategis Bank menjadi acuan dalam melaksanakan tindakan-tindakan strategis Bank, misalnya penutupan kantor cabang dalam rangka efisiensi dan penerbitan surat berharga;</li> <li>• Pencapaian kinerja tahun 2021 cukup baik, namun masih terdapat inkonsistensi proses penyediaan dana, sehingga kualitas kredit berpotensi mengganggu kinerja rentabilitas dan permodalan Bank. Pencapaian dan kondisi yang terjadi telah dikomunikasikan dalam rapat-rapat serta fokus kepada penerapan strategi yang telah diambil Direksi dengan arahan/nasehat Dewan Komisaris;</li> <li>• Kredit korporasi masih mendominasi bisnis Bank, namun demikian Bank terus berupaya untuk mencapai langkah-langkah strategis menjadi bisnis ritel dalam masa pandemi dengan tetap menjalankan prinsip kehati-hatian dalam rangka menekan risiko Bank; dan</li> <li>• Kondisi realisasi bisnis telah dikomunikasikan Direksi kepada Pemegang Saham, sehingga terjalin komunikasi yang kondusif dan telah merumuskan beberapa langkah untuk perbaikan secara berkesinambungan.</li> <li>• The Bank's Business Plan was prepared by the Board of Directors and approved by the Commissioners;</li> <li>• The Bank's strategic plans become references in implementing the Bank's strategic actions, such as closing branch offices for the purpose of efficiency and issuing marketable securities;</li> <li>• The achievement of 2021 performance was satisfactory. However, there were still inconsistencies in the process of fund provisions, resulting in the loan quality to be potentially disrupting the performance of the Bank's rentability and capital. The achievements and conditions occurred were communicated during meetings, and was focused on the implementation of strategies taken by the Board of Directors under the direction or advice of the Board of Commissioners;</li> <li>• Corporate loans remained dominating the Bank's business. However, the Bank continues on striving to achieve strategic measures to become a retail business during pandemic whilst remain to employ the prudential principle in order to suppress the Bank's risks; and</li> <li>• The condition of business realization was communicated by the Board of Directors to the Shareholders, so to build conducive communication and several measures were formulated for a sustainable improvement.</li> </ul>

## Rekomendasi dan Tindak Lanjut Penilaian GCG

Berdasarkan hasil penilaian sendiri implementasi GCG tahun 2021, terdapat beberapa rekomendasi yang perlu ditindaklanjuti yang ditunjukkan sebagai berikut.

Rekomendasi Recommendation	Tindak Lanjut Follow-Up
<p>Bank perlu meningkatkan kompetensi dan kemampuan di bidang penanganan kredit jaringan kantor. The Bank needs to improve its competence and capabilities in the field of office network loan handling.</p>	<p>Sesuai dengan Rencana Bisnis Bank, Bank telah meningkatkan kompetensi dan kemampuan pejabat Bank di jaringan kantor dalam menangani kredit, termasuk pemberian kredit dan penyelesaian kredit bermasalah dengan terus menerapkan prinsip kehati-hatian secara ketat dan menyeluruh.</p>
<p>Bank perlu meningkatkan analisa terkait proses pemberian kredit dan penyelesaian kredit bermasalah. The Bank needs to improve analysis related to the process of providing loans and handling non-performing loans.</p>	<p>In accordance with the Bank's Business Plan, the Bank has improved its competence and capabilities of Bank officials in the office network in handling loans, including lending and handling non-performing loans by continuing to apply the prudential principle in a strict and comprehensive manner.</p>
<p>Masih terdapat denda dan <i>fraud</i> serta meningkatnya kredit bermasalah atau <i>non-performing loan</i> (NPL). There are still fines and fraud as well as an increase in non-performing loans (NPLs).</p>	<p>Bank terus mengupayakan pengelolaan secara optimal terutama di masa pandemi Covid-19, sehingga dapat menghindari terjadinya sanksi dan teguran regulator. Pemantauan terhadap kredit bermasalah juga terus diupayakan oleh pejabat di jaringan kantor dan kantor pusat. The Bank continues to strive for optimal management, especially during the Covid-19 pandemic, in order to avoid sanctions and reprimands from the regulators. Monitoring of non-performing loans is also continuously pursued by officials in the office network and head office.</p>

## Recommendation and Follow-Up on GCG Assessment

Based on self-assessment results for GCG implementation in 2021, there are several recommendations that need to be followed-up as listed below.

## Peningkatan Kualitas Implementasi GCG dan Benchmarking

Dalam meningkatkan kualitas implementasi GCG berdasarkan peningkatan kualitas untuk mencapai standar yang telah ditetapkan, Bank menindaklanjuti rekomendasi hasil penilaian sendiri GCG serta menindaklanjuti temuan dan rekomendasi audit, baik audit internal maupun audit eksternal, seperti kantor akuntan publik, Bank Indonesia, dan Otoritas Jasa Keuangan. Adapun upaya untuk meningkatkan kualitas implementasi GCG berdasarkan peningkatan kualitas dari standar yang telah dicapai, Bank melakukan *benchmarking* kepada bank-bank lainnya yang memiliki kategori dan level yang sama atau lebih tinggi. Melalui proses *benchmarking* tersebut, Bank dapat memperoleh gambaran tentang praktik terbaik implementasi GCG di industri perbankan.

## Improving the Quality of GCG Implementation and the Benchmarking

In improving the quality of GCG implementation based on the intention to achieve the established standards, the Bank has followed-up the recommendations made based on the self-assessment and followed-up the audit findings and recommendations, both from internal audit and from external audit such as public accounting firm, Bank Indonesia, and Financial Services Authority. Efforts taken in improving the quality of GCG implementation based on the intention to achieve the established standard are among others by performing a benchmarking with other banks having the same or higher category and level. Through the benchmarking process, the Bank is able to obtain a clear overview on best practices in GCG implementation in the banking industry.

## Manfaat Implementasi GCG Benefit of GCG Implementation



## Rapat Umum Pemegang Saham General Meeting of Shareholders

Rapat Umum Pemegang Saham (RUPS) merupakan organ tertinggi di Bank yang memiliki wewenang yang tidak diberikan kepada Dewan Komisaris atau Direksi, dalam batas yang ditentukan dalam Undang-Undang tentang Perseroan Terbatas dan/atau Anggaran Dasar Bank.

Dasar hukum pelaksanaan RUPS Bank yang dilaksanakan pada tahun 2021 mengacu pada beberapa peraturan sebagai berikut.

1. Undang-undang No. 40 Tahun 2007 tentang Perseroan Terbatas;
2. Peraturan Otoritas Jasa Keuangan No. 15/POJK.04/2020 tentang Rencana dan Penyelenggaraan Rapat Umum Pemegang Saham Perusahaan Terbuka;
3. Peraturan Otoritas Jasa Keuangan No. 16/POJK.04/2020 tentang Pelaksanaan Rapat Umum Pemegang Saham Perusahaan Terbuka secara Elektronik; dan
4. Anggaran Dasar Bank.

General Meeting of Shareholders (GMS) is the highest organ in the Bank possessing the authority not granted to the Board of Directors and Board of Commissioners, according to the limitations set out in the Bank's Articles of Association and/or the applicable laws and regulations.

The legal ground in implementing the Bank's GMS held in 2021 refers to the following regulations.

1. Law No. 40 of 2007 on Limited Liability Company;
2. Financial Services Authority Regulation No. 15/POJK.04/2020 on Planning and Organizing General Meeting of Shareholders of Public Companies;
3. Financial Services Authority Regulation No. 16/POJK.04/2020 on the Implementation of Electronic General Meeting of Shareholders; and
4. The Bank's Articles of Association.

## Hak dan Wewenang Pemegang Saham

Pemegang Saham memiliki hak atas saham yang dimilikinya sehingga hak Pemegang Saham terlindungi dan dapat dilaksanakan sesuai dengan peraturan perundang-undangan dan Anggaran Dasar Bank. Dalam RUPS, Pemegang Saham berhak menghadiri, mengemukakan pendapat dan mengeluarkan hak suara dalam proses pengambilan keputusan serta memperoleh keterangan yang berkaitan dengan mata acara rapat. Dalam forum RUPS, Pemegang Saham berhak memperoleh keterangan yang berkaitan dengan Bank dari Dewan Komisaris dan/atau Direksi, sepanjang berhubungan dengan mata acara rapat dan tidak bertentangan dengan kepentingan Bank.

Sedangkan, wewenang Pemegang Saham melalui RUPS adalah mengangkat dan memberhentikan Dewan Komisaris dan Direksi, menetapkan remunerasi dan mengevaluasi kinerja Dewan Komisaris dan Direksi, mengesahkan dan menyetujui perubahan Anggaran Dasar dan Laporan Tahunan, menetapkan alokasi penggunaan laba, serta menunjuk akuntan publik.

## Mekanisme Pelaksanaan RUPS

Dalam melaksanakan RUPS, Bank Victoria memperhatikan ketentuan dan mekanisme pelaksanaan sebagai berikut.

## Rights And Authority of the Shareholders

Shareholders have rights on shares owned, and their rights are protected and can be exercised according to laws and regulations and the Bank's Articles of Association. In a GMS, Shareholders are entitled to attend the meeting, to express opinions, to cast votes in a voting process, and to obtain information related to the meeting agenda. In GMS forum, Shareholders are entitled to obtain explanation related to the Bank from the Board of Commissioners and/or Board of Directors, to the extent related to the meeting agenda and does not contradict the Bank's interests.

Furthermore, Shareholders authorities through the GMS are to appoint and dismiss the Board of Commissioners and Board of Directors, to determine remuneration and evaluate the work performance of the Board of Commissioners and Board of Directors, to validate and approve amendment to the Articles of Association and Annual Report, to determine appropriation of profit, and to appoint a public accountant.

## GMS Mechanism

In holding GMS, Bank Victoria takes into consideration the followings regulations and mechanism.

### Pemberitahuan RUPS GMS Notification

Pemberitahuan mengenai rencana dan mata acara RUPS wajib disampaikan kepada Otoritas Jasa Keuangan paling lambat 5 (lima) hari kerja sebelum tanggal pengumuman RUPS kepada publik.

Notification for the meeting plan and agenda must be submitted to the Financial Services Authority no later than 5 (five) business days prior to the GMS announcement to the public.

### Pengumuman RUPS GMS Announcement

Pengumuman RUPS disampaikan minimal melalui 1 (satu) Surat Kabar harian nasional Berbahasa Indonesia, situs web bursa efek dan situs resmi Bank paling lambat 14 hari sebelum tanggal Pengumuman RUPS. Bukti Pengumuman RUPS di surat kabar wajib disampaikan kepada Otoritas Jasa Keuangan paling lambat 2 (dua) hari kerja setelah pengumuman RUPS. Adapun Pengumuman RUPS tersebut minimal memuat ketentuan Pemegang Saham yang berhak hadir dalam, ketentuan Pemegang Saham yang berhak mengusulkan mata acara rapat RUPS, serta tanggal penyelenggaraan dan pemanggilan RUPS.

GMS Announcement is made minimum in 1 (one) Indonesian Language daily newspaper, on the Indonesia Stock exchange's website and the Bank's website, no later than 14 days prior to the date of the GMS Announcement. The proof of such GMS Announcement on the newspaper must be submitted to the Financial Services Authority no later than 2 (two) business days after the GMS Announcement. Such GMS Announcement must at least contain provisions about Shareholders entitled to attend the meeting, provisions about Shareholders entitled to propose the GMS agenda, and the GMS convening date and notice date.

### Pemanggilan RUPS GMS Notice

Pemanggilan RUPS disampaikan minimal melalui 1 (satu) Surat Kabar harian nasional Berbahasa Indonesia, situs web bursa efek, dan situs resmi Bank paling lambat 21 hari sebelum penyelenggaraan RUPS. Bukti Pemanggilan RUPS di surat kabar wajib disampaikan kepada Otoritas Jasa Keuangan paling lambat 2 (dua) hari kerja setelah Pemanggilan RUPS. Adapun pemanggilan RUPS tersebut minimal memuat tanggal, waktu, dan tempat penyelenggaraan RUPS, ketentuan Pemegang Saham yang berhak hadir dalam RUPS, mata acara rapat termasuk penjelasan atas setiap mata acara tersebut, dan Informasi yang menyatakan bahan terkait mata acara rapat tersedia bagi Pemegang Saham sejak tanggal dilakukannya pemanggilan RUPS sampai dengan RUPS diselenggarakan.

GMS Notice must be made minimum in 1 (one) Indonesian Language daily newspaper, on the Indonesia Stock exchange's website and the Bank's website, no later than 21 days prior to the GMS date. The proof of such GMS Notice on the newspaper must be submitted to the Financial Services Authority no later than 2 (two) business days after the GMS Notice. Such GMS Notice must at least contain the date, time, and place of the GMS, provisions about Shareholders entitled to attend the meeting, the meeting agenda including explanation regarding each item of the agenda, and information stating that materials related to the agenda are available to the Shareholders as of the GMS Notice date up to the GMS date.

## Penyelenggaraan RUPS GMS Implementation

Penyelenggaraan RUPS wajib diadakan di wilayah Negara Republik Indonesia, antara lain tempat kedudukan Bank, tempat Bank melakukan kegiatan usaha utamanya, ibukota provinsi di tempat kedudukan atau tempat kegiatan usaha utama Bank, atau provinsi tempat kedudukan Bursa Efek Indonesia. Selain itu, RUPS dapat diselenggarakan jika dihadiri oleh Pemegang Saham Independen yang mewakili ½ (satu per dua) bagian dari jumlah seluruh saham dengan hak suara sah yang dimiliki oleh Pemegang Saham Independen.

GMS must be implemented in the territory of the Republic of Indonesia, among others in the Bank's place of domicile, the Bank's main place of business, capital of the province where the Bank's domicile and main place of business is, or at the province where Indonesia Stock Exchange is domiciled. Furthermore, the GMS can be held if attended by Independent Shareholders representing ½ (half) part of the total shares with valid voting rights owned by the Independent Shareholders.

## Pemegang Saham Utama dan Pengendali

Dalam mengambil keputusan RUPS, Pemegang Saham Utama dan Pengendali harus memperhatikan kepentingan Pemegang Saham Minoritas dan pemangku kepentingan lainnya. Sementara itu, Pemegang Saham Minoritas bertanggung jawab agar menggunakan haknya dengan baik.

## Main and Controlling Shareholders

In adopting GMS resolutions, the Main and Controlling Shareholders must take into consideration the interest of Minority Shareholders and other stakeholders. Meanwhile the Minority Shareholders are responsible for exercising their rights appropriately.

## Perlakuan yang Sama terhadap Seluruh Pemegang Saham

Bank Victoria menerapkan prinsip perlakuan yang sama terhadap seluruh Pemegang Saham dalam melaksanakan keterbukaan informasi, baik terhadap Pemegang Saham Mayoritas maupun Minoritas. Hal ini dimaksudkan agar tidak terdapat informasi pihak dalam (*inside information*) yang hanya diketahui oleh Pemegang Saham Mayoritas. Pelaksanaan fungsi keterbukaan informasi tersebut dilakukan oleh *Corporate Secretary*.

## Equal Treatment to All Shareholders

Bank Victoria implements equal treatment to all Shareholders in implementing information transparency, either to Majority Shareholders or to Minority Shareholders. This is intended so that there will not be any insider information known only to the Majority Shareholders. The information transparency function is performed by the *Corporate Secretary*.

## Pelaksanaan RUPS Tahun 2021

Pada tahun 2021, Bank Victoria telah menyelenggarakan 1 (satu) kali RUPS Tahunan yang diselenggarakan pada 25 Juni 2021 dan 1 (satu) kali RUPS Luar Biasa pada 30 November 2021.

## GMS Implementation in 2021

In 2021, Bank Victoria held 1 (one) Annual GMS on 25 June 2021 and 1 (one) Extraordinary GMS on 30 November 2021.

### RUPS Tahunan 25 Juni 2021 Annual GMS 25 June 2021

Keterangan Description		Pelaksanaan Implementation
Pemberitahuan Notification		Diberitahukan 7 Mei 2021 kepada Otoritas Jasa Keuangan. Notified on 7 May 2021 to the Financial Services Authority.
Pengumuman Announcement	Publikasi Publication	Diumumkan melalui situs web Bursa Efek Indonesia, situs web KSEI, dan situs web Bank <a href="http://www.victoriabank.co.id">www.victoriabank.co.id</a> pada 19 Mei 2021. Announced on Indonesia Stock Exchange's website, KSEI's website, and the Bank's website <a href="http://www.victoriabank.co.id">www.victoriabank.co.id</a> on 19 May 2021.
	Laporan ke Regulator Report to the Regulators	Bukti pengumuman RUPS Tahunan di situs web Bank telah disampaikan kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia secara <i>e-reporting</i> pada 19 Mei 2021. Proof of the Annual GMS notice on the newspaper was submitted to the Financial Services Authority and Indonesia Stock Exchange through <i>e-reporting</i> on 19 May 2021.



Keterangan Description		Pelaksanaan Implementation
Pemanggilan Notice	Publikasi Publication	Diumumkan pada situs web Bursa Efek Indonesia, situs web KSEI, dan situs web Bank www.victoriabank.co.id pada 3 Juni 2021. Announced on Indonesia Stock Exchange's website, KSEI's website, and the Bank's website www.victoriabank.co.id on 3 June 2021.
	Laporan ke Regulator Report to the Regulators	Bukti pemanggilan RUPS Tahunan di situs web Bank telah disampaikan kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia secara e-reporting pada 3 Juni 2021. Proof of the Extraordinary GMS notice on the Bank's website was submitted to the Financial Services Authority and Indonesia Stock Exchange through e-reporting on 3 June 2021.
Pelaksanaan Implementation		Diselenggarakan pada Jumat, 25 Juni 2021 pukul 09.53-10.41 WIB di Graha BIP, Function Hall Lt. 11, Jl. Jenderal Gatot Subroto Kav. 23, Jakarta Selatan, 12930. Held on Friday, 25 June 2021, at 09.53-10.41 WIB at Graha BIP, Function Hall 11 <sup>th</sup> floor, Jl. Jend. Gatot Subroto Kav. 23, South Jakarta, 12930.
Penyampaian Ringkasan Risalah RUPS Submission of summary of GMS Minutes	Publikasi Publication	Ringkasan Risalah RUPS Tahunan diumumkan pada situs web Bursa Efek Indonesia, situs web KSEI, dan situs web Bank www.victoriabank.co.id pada 29 Juni 2021. Summary of Annual GMS Minutes was announced on Indonesia Stock Exchange's website, KSEI's website, and the Bank's website www.victoriabank.co.id on 29 June 2021.
	Laporan ke Regulator Report to the Regulators	Bukti pengumuman disampaikan kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia secara e-reporting pada 29 Juni 2021. Proof of the announcement was submitted to the Financial Services Authority and Indonesia Stock Exchange through e-reporting on 29 June 2021.
Risalah Minutes		Akta Risalah RUPS Tahunan disampaikan ke Otoritas Jasa Keuangan pada 23 Juli 2021. Deed of Minutes of Annual GMS was submitted to the Financial Services Authority on 23 July 2021.

**Kehadiran dalam RUPS Tahunan 25 Juni 2021**  
Attendance of Annual GMS 25 June 2021

Nama Name	Jabatan Position	Kehadiran Attendance	Alasan Tidak Hadir Reason for Absence
<b>Dewan Komisaris</b> Board of Commissioners			
Oliver Simorangkir	Komisaris Utama President Commissioner	√ (secara virtual / virtually)	-
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	√ (secara fisik / in person)	-
Zaenal Abidin, PhD	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	√ (secara virtual / virtually)	-
<b>Direksi</b> Board of Directors			
Ahmad Fajar	Direktur Utama President Director	√ (secara fisik / in person)	-
Rusli	Wakil Direktur Utama Deputy President Director	√ (secara fisik / in person)	-
Lembing	Direktur Director	√ (secara virtual / virtually)	-
Debora Wahjutirto Tanoyo	Direktur Director	×	Sakit Sick
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	√ (secara virtual / virtually)	-

Nama Name	Jabatan Position	Kehadiran Attendance	Alasan Tidak Hadir Reason for Absence
<b>Pihak Independen</b> Independent Party			
Fathiah Helmi, SH	Notaris Notary	✓	-
Helda Dominggus	Biro Administrasi Efek Bank, PT Adimitra Jasa Korpora Share Registrar Bureau, PT Adimitra Jasa Korpora	✓	-
<b>Pemegang Saham</b> Shareholders			
Dihadiri oleh 7.449.752.581 saham atau 78,10% dari keseluruhan saham yang telah teralokasi. Attended by 7,449,752,581 shares or 78.10% of the total shares allocated.			

### Hasil Keputusan RUPS Tahunan 25 Juni 2021 Resolutions of Annual GMS 25 June 2021

#### Mata Acara 1:

**Persetujuan dan pengesahan Laporan Tahunan, Laporan Tugas Pengawasan Dewan Komisaris serta memberikan pelunasan dan pembebasan tanggung jawab sepenuhnya (*acquit et de charge*) kepada anggota Dewan Komisaris dan Direksi Perseroan untuk tahun buku yang berakhir pada 31 Desember 2020.**

#### Agenda - Item 1:

**Approval and validation of the Annual Report, Supervisory Report of Board of Commissioners, and granting full release and discharge (*acquit et de charge*) to the members of the Company's Board of Commissioners and Board of Directors for the fiscal year ended 31 December 2020.**

Keputusan Resolution	<ol style="list-style-type: none"> <li>Menyetujui Laporan Tahunan Perseroan untuk tahun buku yang berakhir pada 31 Desember 2020, termasuk Laporan Direksi dan Laporan Tugas Pengawasan Dewan Komisaris Perseroan; serta</li> <li>Menyetujui serta mengesahkan Laporan Keuangan Perseroan untuk tahun buku yang berakhir pada 31 Desember 2020 yang telah diaudit oleh Kantor Akuntan Publik Tanudiredja, Wibisana, Rintis &amp; Rekan dengan <i>partner</i> penanggung jawab Jimmy Pangestu, SE dengan opini audit secara wajar dalam semua hal yang material sesuai dengan Laporan Auditor Independen No. 008844/2.1025/AU.1/07/1124-2/1/IV/2021 tanggal 30 April 2021 dengan demikian membebaskan anggota Dewan Komisaris dan Direksi Perseroan dari tanggung jawab dan segala tanggungan (<i>acquit et de charge</i>) atas tindakan pengurusan dan pengawasan yang Dewan Komisaris dan Direksi yang dijalankan selama tahun buku 2020, sepanjang tindakan-tindakan mereka tercantum dalam neraca dan Laporan Laba Rugi Perseroan pada tahun buku 2020.</li> </ol> <ol style="list-style-type: none"> <li>Approved the Company's Annual Report for the fiscal year ended 31 December 2020, including the Board of Directors' Report and Supervisory Report of the Board of Commissioners; and</li> <li>Approved and validated the Financial Statements for the fiscal year ended 31 December 2020, which was audited by the Public Accounting Firm Tanudiredja, Wibisana, Rintis and Partners with the partner in charge Jimmy Pengestu, SE, with audit opinion of fair in all material respects according to the Independent Auditor Report No. 008844/2.1025/AU.1/07/1124-2/1/IV/2021 dated 30 April 2021, which thereby, giving the members of the Board of Commissioners and Board of Directors of the Bank a full release and discharge (<i>acquit et discharge</i>) from all responsibilities and liabilities for the management and supervision actions carried out by the Board of Commissioners and the Board of Directors during the 2020 fiscal year, provided that their actions are set out in the Company's Balance Sheet and Profit and Loss Statement the 2020 fiscal year.</li> </ol>
Realisasi Realization	Telah direalisasikan sepenuhnya. Fully realized.
Pengambilan Suara Voting	Musyawarah mufakat. Amicable resolution.

**Mata Acara 2:**

**Penentuan honorarium dan/atau tunjangan anggota Dewan Komisaris dan penentuan gaji dan/atau tunjangan anggota Direksi Perseroan, serta pemberian wewenang kepada Dewan Komisaris dan Komite Nominasi dan Remunerasi Perseroan untuk menetapkan gaji dan/atau honorarium beserta tunjangan bagi anggota Dewan Komisaris dan anggota Direksi Perseroan.**

**Agenda - Item 2:**

**Determination of the honorarium and/or allowances for the member of the Board of Commissioners and determination of the salaries and/or allowances for the Board of Directors, and granting authority to the Board of Commissioners and the Nomination and Remuneration Committee to determine the salaries and/or honorarium and allowances for members of the Board of Commissioners and members of the Board of Directors.**

Keputusan Resolution	<ol style="list-style-type: none"> <li>1. Menyetujui memberi kuasa dan wewenang kepada PT Victoria Investama Tbk selaku Pemegang Saham dalam Perseroan untuk menetapkan besarnya honorarium anggota Dewan Komisaris untuk tahun 2021; dan</li> <li>2. Menyetujui pelimpahan wewenang kepada Dewan Komisaris Perseroan untuk menetapkan besarnya gaji dan tunjangan anggota Direksi untuk tahun 2021.</li> </ol> <p>1. Approved to grant power and authority to PT Victoria Investama Tbk, as the Company's Shareholders to determine the honorarium amount for members of Board of Commissioners for 2021; and</p> <p>2. Approved the transfer of power to the Board of Commissioners to determine the amount of salaries and allowances for members of Board of Directors for 2021.</p>
Realisasi Realization	<p>Telah direalisasikan sepenuhnya dengan menetapkan total honorarium Dewan Komisaris sebesar Rp2.409.749.022,- dan Direksi sebesar Rp12.792.853.723,-.</p> <p>Fully realized, by determining the total honorarium of Board of Commissioners of Rp2,409,749,022 and Board of Directors of Rp12,792,853,723.</p>
Pengambilan Suara Voting	Musyawarah mufakat. Amicable resolution.

**Mata Acara 3:**

**Penunjukkan akuntan publik independen terdaftar yang akan melakukan audit atas buku-buku Perseroan untuk tahun buku yang berakhir pada 31 Desember 2021.**

**Agenda - Item 3:**

**Appointment of registered public accounting firm to audit the Company's books for the fiscal year ended 31 December 2021.**

Keputusan Resolution	<p>Memberikan wewenang kepada Dewan Komisaris Perseroan untuk menunjuk akuntan publik independen dari kantor akuntan publik independen yang terdaftar di Otoritas Jasa Keuangan sehubungan Dewan Komisaris masih dalam proses penentuan akuntan publik yang akan mengaudit buku Bank dengan kriteria:</p> <ol style="list-style-type: none"> <li>1. Akuntan publik dan kantor akuntan publik wajib terdaftar pada Otoritas Jasa Keuangan;</li> <li>2. Kantor akuntan publik merupakan salah satu anggota dari <i>big four</i> dan akuntan publik; dan</li> <li>3. Kantor akuntan publik merupakan pihak yang independen dan profesional untuk mengaudit Laporan Keuangan Perseroan untuk tahun buku 2021 dengan memperhatikan rekomendasi dari Komite Audit.</li> </ol> <p>Melimpahkan kewenangan kepada Dewan Komisaris untuk menetapkan jumlah honorarium dan persyaratan lain sehubungan dengan penunjukan kantor akuntan publik dimaksud.</p> <p>Granted authority to the Bank's Board of Commissioners to appoint an independent public accountant from the independent Public Accounting Firms registered with the Financial Services Authority, in relation to the ongoing process of determining an Independent Public Accountant that will audit the Bank's books under the following criteria:</p> <ol style="list-style-type: none"> <li>1. Public accountant and Public accounting firm must be registered with the Financial Services Authority;</li> <li>2. The public accounting firm must be a member of the big four accounting firms; and</li> <li>3. Public accounting firm is an independent and professional party to audit the Company's Financial Statements for the 2021 fiscal year with due observance of recommendations from the Audit Committee.</li> </ol> <p>Granted authority to Board of Commissioners to determine the honorarium amount and other requirements in relation to appointment of such public accounting firm.</p>
Realisasi Realization	<p>Telah direalisasikan sepenuhnya dengan menunjuk Kantor Akuntan Publik Purwantono, Sungkoro &amp; Surja dengan honorarium sebesar Rp1.550.000.000,-.</p> <p>Fully realized by appointing Public Accounting Firm Purwantono, Sungkoro &amp; Surja with a honorarium of Rp1,550,000,000.</p>
Pengambilan Suara Voting	Musyawarah mufakat. Amicable resolution.

**Mata Acara 4:**  
**Pemberian kuasa dan wewenang kepada Dewan Komisaris untuk menyatakan realisasi pengeluaran saham dalam rangka Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) yang telah diputuskan dalam Rapat Umum Pemegang Saham Tahunan 10 Mei 2019.**

**Agenda - Item 4:**  
**Granting power and authority to the Board of Commissioners to state the realization of number of shares issued for the purpose of Capital Increase Without Pre-emptive Right (PMTHMETD) as a resolution adopted in the Annual General Meeting of Shareholders held on 10 May 2019.**

Keputusan Resolution	<p>Memberikan kuasa kepada Dewan komisaris untuk merealisasikan dan menyatakan dalam akta notaris mengenai peningkatan modal ditempatkan dan disetor dengan jumlah sebanyak-banyaknya 10,00% dari modal ditempatkan dan disetor penuh dalam Perseroan, untuk jangka waktu 1 tahun terhitung sejak RUPS ini dalam Akta Notaris. Dengan demikian, merubah Pasal 4 ayat 2 dan ayat 3 Anggaran Dasar Perseroan dan untuk menyatakan kembali keputusan berkenaan dengan perubahan Pasal 4 ayat 2 dan ayat 3 Anggaran Dasar Perseroan tersebut dalam 1 Akta Notaris dan selanjutnya mengajukan permohonan pemberitahuan kepada Menteri Hukum dan Hak Asasi Manusia Republik Indonesia, serta mengumumkan dalam Berita Negara Republik Indonesia, serta mengumumkan dalam Berita Negara Republik Indonesia sesuai dengan peraturan perundangan-undangan.</p> <p>Granted power to the Board of Commissioners to realize and set out in a notarial deed regarding capital increase subscribed and paid-up in the amount of maximum 10.00% from the capital fully subscribed and paid-up in the Company, for a period of 1 year effective from the GMS date, in a Notarial Deed. As such amending Article 4 paragraph 2 and paragraph 3 of the Company's Articles of Association and to restate the resolution related to the amendment to Article 4 paragraph 2 and paragraph 3 of the Company's Articles of Association in 1 Notarial Deed and thereafter file a notification request to the Minister of Law and Human Rights of The Republic of Indonesia, and to promulgate in the Official Gazette of the Republic of Indonesia in accordance with the laws and regulations.</p>
Realisasi Realization	Telah direalisasikan sepenuhnya. Fully realized.
Pengambilan Suara Voting	Musyawahar mufakat. Amicable resolution.

**RUPS Luar Biasa 30 November 2021**  
**Extraordinary GMS 30 November 2021**

Keterangan Description		Pelaksanaan Implementation
Pemberitahuan otification		Diberitahukan 14 Oktober 2021 kepada Otoritas Jasa Keuangan. Notified on 14 October 2021 to the Financial Services Authority.
Pengumuman Notification	Publikasi Publication	Diumumkan melalui situs web Bursa Efek Indonesia, situs web KSEI, dan situs web Bank www.victoriabank.co.id pada 22 Oktober 2021. Announced on Indonesia Stock Exchange's website, KSEI's website, and the Bank's website www.victoriabank.co.id on 22 October 2021.
	Laporan ke Regulator Report to the Regulators	Bukti pengumuman RUPS Luar Biasa di situs web Bank telah disampaikan kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia secara <i>e-reporting</i> pada 22 Oktober 2021. Proof of the Extraordinary GMS notice on the Bank's website was submitted to the Financial Services Authority and Indonesia Stock Exchange through e-reporting on 22 October 2021.
Pemanggilan Notice	Publikasi Publication	Diumumkan pada situs web Bursa Efek Indonesia, situs web KSEI, dan situs web Bank www.victoriabank.co.id pada 8 November 2021. Announced on Indonesia Stock Exchange's website, KSEI's website, and the Bank's website www.victoriabank.co.id on 8 November 2021.
	Laporan ke Regulator Report to the Regulators	Bukti pemanggilan RUPS Luar Biasa di situs web Bank telah disampaikan kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia secara <i>e-reporting</i> pada 8 November 2021. Proof of the Extraordinary GMS notice on the Bank's website was submitted to the Financial Services Authority and Indonesia Stock Exchange through e-reporting on 8 November 2021.
Pelaksanaan Implementation		Diselenggarakan pada 30 November 2021 pukul 10.09-10.43 WIB di Graha BIP, Function Hall Lt. 11, Jl. Jenderal Gatot Subroto Kav. 23, Jakarta Selatan, 12930. Held on 30 November 2021, at 10.09-10.43 WIB at Graha BIP, Function Hall 11 <sup>th</sup> floor, Jl. Jenderal. Gatot Subroto Kav. 23, South Jakarta, 12930.

Keterangan Description		Pelaksanaan Implementation
Penyampaian Ringkasan Risalah RUPS Submission of summary of GMS Minutes	Publikasi Publication	Ringkasan Risalah RUPS Luar Biasa diumumkan pada situs web Bursa Efek Indonesia, situs web KSEI, dan situs web Bank www.victoriabank.co.id pada 2 Desember 2021. Summary of Extraordinary GMS Minutes was announced on Indonesia Stock Exchange's website, KSEI's website, and the Bank's website www.victoriabank.co.id on 2 December 2021.
	Laporan ke Regulator Report to the Regulators	Bukti pengumuman disampaikan kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia secara e-reporting pada 2 Desember 2021. Proof of the announcement was submitted to the Financial Services Authority and Indonesia Stock Exchange through e-reporting on 2 December 2021.
Risalah Minutes		Akta Risalah RUPS Luar Biasa disampaikan ke Otoritas Jasa Keuangan pada 23 Desember 2021. Deed of Minutes of Extraordinary GMS was submitted to the Financial Services Authority on 23 December 2021.

**Kehadiran dalam RUPS Luar Biasa 30 November 2021**  
Attendance of Extraordinary GMS 30 November 2021

Nama Name	Jabatan Position	Kehadiran Attendance	Alasan Tidak Hadir Reason for Absence
<b>Dewan Komisaris</b> Board of Commissioners			
Oliver Simorangkir	Komisaris Utama President Commissioner	✓ (secara virtual / virtually)	-
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	✓ (secara virtual / virtually)	-
Zaenal Abidin, PhD	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	✓ (secara virtual / virtually)	-
<b>Direksi</b> Board of Directors			
Ahmad Fajar	Direktur Utama President Director	✓ (secara fisik / in person)	-
Rusli	Wakil Direktur Utama Deputy President Director	✓ (secara fisik / in person)	-
Lembing	Direktur Director	✓ (secara virtual / virtually)	-
Debora Wahjutirto Tanoyo	Direktur Director	✓ (secara virtual / virtually)	-
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	✓ (secara virtual / virtually)	-
<b>Pihak Independen</b> Independent Party			
Mohamad Renaldi Warganegara, SH, MBA	Notaris Notary	✓ (secara fisik / in person)	-
Moses F Dasilva	Konsultan Hukum, Kantor Konsultan Hukum Da Silva dan Suhardiadi Legal Consultant, Legal Consultant Office of Da Silva dan Suhardiadi	✓ (secara fisik / in person)	-
<b>Pemegang Saham</b> Shareholders			
Dihadiri oleh 5.723.000.266 saham atau 60,00% dari keseluruhan saham yang telah teralokasi. Attended by 5,723,000,266 shares or 60.00% of the total shares allocated.			

## Hasil Keputusan RUPS Luar Biasa 30 November 2021 Resolutions of Extraordinary GMS 30 November 2021

### Mata Acara 1:

#### Persetujuan penambahan modal yang dikecualikan dari memberikan Hak Memesan Efek Terlebih Dahulu (HMETD).

##### Agenda 1:

##### Approval to increase capital exempted from having to grant Pre-emptive Rights (HMETD).

Keputusan Resolution	Menyetujui Penambahan modal yang dikecualikan dari memberikan HMETD Perseroan dengan jumlah sebanyak-banyaknya sebesar 10% dari modal ditempatkan dan disetor penuh dalam Perseroan, yaitu sebanyak-banyaknya 953.815.298 saham dengan memperhatikan peraturan perundang-undangan yang berlaku termasuk peraturan di bidang pasar modal.  Approved the Capital Increase exempted from having to grant Pre-emptive Rights (HMETD) with a total of maximum 10% from the fully subscribed and paid in capital in the Company, which is at a maximum of 953,815,298 shares with due observance of the prevailing laws and regulations including stock exchange regulations.
Realisasi Realization	Telah direalisasikan sepenuhnya. Fully realized.
Pengambilan Suara Voting	Musyawarah mufakat. Amicable Resolution.

### Mata Acara 2:

#### Perubahan Pasal 4 ayat 2 dan 3 Anggaran Dasar Perseroan sehubungan dengan penambahan modal yang dikecualikan dari memberikan HMETD.

##### Agenda - Item2:

##### Amendment to Article 4 paragraph 2 and paragraph 3 of the Company's Articles of Association in relation to capital increase exempted from having to grant Pre-emptive Rights (HMETD).

Keputusan Resolutions	<ol style="list-style-type: none"> <li>Menyetujui Perubahan Pasal 4 ayat 2 dan 3 Anggaran Dasar Perseroan sehubungan dengan penambahan modal yang dikecualikan dari memberikan HMETD sebagaimana telah diputuskan dalam mata acara rapat pertama; dan</li> <li>Menyetujui memberikan kuasa kepada Dewan Komisaris untuk merealisasikan dan menyatakan dalam akta notaris tersendiri mengenai peningkatan modal ditempatkan dan disetor dengan jumlah sebanyak-banyaknya sebesar 10% dari modal ditempatkan dan disetor penuh dalam perseroan, yaitu sebanyak-banyaknya 953.815.298 saham, untuk jangka waktu 1 tahun terhitung sejak rapat dalam akta notaris sehubungan dengan penambahan modal yang dikecualikan dari HMETD sebagaimana telah diputuskan dalam mata acara rapat pertama dan selanjutnya mengajukan permohonan pemberitahuan kepada Menteri Hukum dan Hak Asasi Manusia Republik Indonesia, serta mengumumkan dalam Berita Negara Republik Indonesia sesuai dengan peraturan perundang-undangan.</li> </ol> <ol style="list-style-type: none"> <li>Approved the Amendment to Article 4 paragraph 2 and 3 of the Company's Articles of Association related to capital increase exempted from having to grant Pre-emptive Rights (HMETD) as resolved in the first item of the meeting agenda; and</li> <li>Approved and granted power to the Board of Directors to realize and set out in a separate notarial deed regarding capital increase subscribed and paid-up in the amount of maximum 10.00% from the capital fully subscribed and paid-up in the Company, which is at a maximum of 953,815,298 shares, for a period of 1 year effective from the GMS date, in a Notarial Deed, with relation to the capital increase exempted from having to grant Pre-emptive Rights (HMETD), as resolved in the first item of the meeting agenda and thereafter apply for a notification request to the Minister of Law and Human Rights of the Republic of Indonesia, and to promulgate in the Official Gazette of the Republic of Indonesia in accordance with the laws and regulations.</li> </ol>
Realisasi Realization	Telah direalisasikan sepenuhnya. Fully realized.
Pengambilan Suara Voting	Musyawarah mufakat. Amicable resolution.

## Pelaksanaan RUPS Tahun 2020

Pada tahun 2020, Bank Victoria melaksanakan 1 (satu) kali RUPS Tahunan pada 19 Juni 2020. RUPS tersebut menghasilkan 5 (lima) keputusan atau arahan dari Pemegang Saham. Status realisasi tindak lanjut keputusan atau arahan Pemegang Saham tersebut diungkapkan sebagai berikut.

## GMS Implementation in 2020

In 2020, Bank Victoria held 1 (one) Annual GMS on 19 June 2020. The GMS adopted 5 (five) resolutions or directions from the Shareholders. Realization status of Shareholders resolutions or follow-up on directions are as disclosed below.

## RUPS Tahunan 19 Juni 2020

Annual GMS 19 June 2020

Keterangan Description		Pelaksanaan Implementation
Pemberitahuan Notification		Diberitahukan pada 27 April 2020 kepada Otoritas Jasa Keuangan. Notified on 27 April 2020 to the Financial Services Authority.
Pengumuman Announcement	Publikasi Publication	Diumumkan melalui surat kabar Harian Terbit, situs web Bursa Efek Indonesia dan situs web Bank <a href="http://www.victoriabank.co.id">www.victoriabank.co.id</a> pada 13 Mei 2020. Announced on Harian Terbit newspaper, Indonesia Stock Exchange's website, and the Bank's website <a href="http://www.victoriabank.co.id">www.victoriabank.co.id</a> on 13 May 2020.
	Laporan ke Regulator Report to the Regulators	Bukti pemanggilan RUPS Tahunan di surat kabar telah disampaikan kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia secara <i>e-reporting</i> pada 13 Mei 2020. Proof of the Extraordinary GMS notice on the newspaper was submitted to the Financial Services Authority and Indonesia Stock Exchange through e-reporting on 13 May 2020.
Pemanggilan Notice	Publikasi Publication	Diumumkan pada surat kabar Harian Terbit, situs web Bursa Efek Indonesia dan situs web Bank <a href="http://www.victoriabank.co.id">www.victoriabank.co.id</a> pada 28 Mei 2020. Announced on Harian Terbit newspaper, Indonesia Stock Exchange's website, and the Bank's website <a href="http://www.victoriabank.co.id">www.victoriabank.co.id</a> on 28 May 2020.
	Laporan ke Regulator Report to the Regulators	Bukti pemanggilan RUPS Tahunan di surat kabar telah disampaikan kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia secara <i>e-reporting</i> pada 28 Mei 2020. Proof of the Annual GMS notice on the newspaper was submitted to the Financial Services Authority and Indonesia Stock Exchange through e-reporting on 28 May 2020.
Pelaksanaan Implementation		Diselenggarakan pada Jumat, 19 Juni 2020 pukul 14.06-14.54 WIB di Graha BIP, Function Hall Lt. 11, Jl. Jenderal Gatot Subroto Kav. 23, Jakarta Selatan, 12930. Held on Friday, 19 June 2020, at 14.06-14.54 WIB at Graha BIP, Function Hall 11 <sup>th</sup> floor, Jl. Jenderal Gatot Subroto Kav. 23, South Jakarta, 12930.
Penyampaian Ringkasan Risalah RUPS Submission of Summary of GMS Minutes	Publikasi Publication	Ringkasan Risalah RUPS Tahunan diumumkan pada surat kabar Harian Terbit, situs web Bursa Efek Indonesia dan situs web Bank <a href="http://www.victoriabank.co.id">www.victoriabank.co.id</a> pada 23 Juni 2020. Summary of Annual GMS Minutes was published on Harian Terbit newspaper, Indonesia Stock Exchange's website, and the Bank's website <a href="http://www.victoriabank.co.id">www.victoriabank.co.id</a> on 23 June 2020.
	Laporan ke Regulator Report to the Regulators	Bukti pengumuman disampaikan kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia secara <i>e-reporting</i> pada 23 Juni 2020. Proof of the announcement was submitted to the Financial Services Authority and Indonesia Stock Exchange through e-reporting on 23 June 2020.
Risalah Minutes		Akta Risalah RUPS Tahunan disampaikan ke Otoritas Jasa Keuangan pada 8 Juli 2020. Deed of Minutes of Annual GMS was submitted to the Financial Services Authority on 8 July 2020.

## Kehadiran dalam RUPS Tahunan 19 Juni 2020

Attendance of Annual GMS 19 June 2020

Nama Name	Jabatan Position	Kehadiran Attendance	Alasan Tidak Hadir Reason for Absence
<b>Dewan Komisaris</b> Board of Commissioners			
Oliver Simorangkir	Komisaris Utama President Commissioner	√ (secara fisik / in person)	-
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	√ (secara fisik / in person)	-
Zaenal Abidin, PhD	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	√ (secara fisik / in person)	-
<b>Direksi</b> Board of Directors			
Ahmad Fajar	Direktur Utama President Director	√ (secara fisik / in person)	-
Rusli	Wakil Direktur Utama Deputy President Director	√ (secara fisik / in person)	-
Lembing	Direktur Director	√ (secara fisik / in person)	-



Nama Name	Jabatan Position	Kehadiran Attendance	Alasan Tidak Hadir Reason for Absence
Debora Wahjutirto Tanoyo	Direktur Director	√ (secara fisik / in person)	-
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	√ (secara fisik / in person)	-
<b>Pihak Independen</b> Independent Party			
Fathiah Helmi, SH	Notaris Notary	√ (secara fisik / in person)	-
M Jusuf Wibisana, MEc, CPA	Akuntan Publik, Kantor Akuntan Publik Tanudiredja, Wibisana, Rintis dan Rekan Public Accountant, Public Accounting Firm Tanudiredja, Wibisana, Rintis and Partners	√ (secara fisik / in person)	-
Moses F Dasilva (Moses Fernandez Da Silva)	Konsultan Hukum, Kantor Konsultan Hukum Da Silva Legal Consultant, Legal Consultant Office of Da Silva	√ (secara fisik / in person)	-
Edi Purnomo	Biro Administrasi Efek Bank, PT Adimitra Jasa Korpora Share Registrar Bureau, PT Adimitra Jasa Korpora	√ (secara fisik / in person)	-
<b>Pemegang Saham</b> Shareholders			
Dihadiri oleh 7.483.953.491 saham atau 83,60% dari keseluruhan saham yang telah teralokasi. Attended by 7,483,953,491 shares or 83.60% of total allocated shares.			

### Hasil Keputusan RUPS Tahunan 19 Juni 2020 Resolutions of Annual GMS 19 June 2020

#### Hasil Keputusan RUPS Tahun 2020 Resolutions of Annual GMS 2020

- Menyetujui Laporan Tahunan Bank untuk tahun buku yang berakhir pada 31 Desember 2019, termasuk Laporan Direksi dan Laporan Tugas Pengawasan Dewan Komisaris Bank; dan
  - Menyetujui serta mengesahkan Laporan Keuangan Bank untuk tahun buku yang berakhir pada 31 Desember 2019 yang telah diaudit oleh Kantor Akuntan Publik Tanudiredja, Wibisana, Rintis dan Rekan dengan *partner* penanggung jawab Jimmy Pengestu, SE dengan opini audit wajar, dalam semua hal yang material sesuai dengan laporan No. 00704/2.1025/AU.1/07/1124-1/1/IV/2020 tanggal 27 April 2020 dengan demikian membebaskan anggota Dewan Komisaris dan Direksi Bank dari tanggung jawab dan segala tanggungan (*acquit et de charge*) atas tindakan pengurusan dan pengawasan yang Dewan Komisaris dan Direksi jalankan selama tahun buku 2019, sepanjang tindakan-tindakan mereka tercantum dalam neraca dan laporan laba rugi Bank tahun buku 2019.
- Approved the Bank's Annual Report for the fiscal year ended 31 December 2019, including the Board of Directors' Report and Supervisory Report of the Board of Commissioners; and
  - Approved and validated the Bank's Financial Statements for the fiscal year ended 31 December 2019, which was audited by the Public Accounting Firm Tanudiredja, Wibisana, Rintis and Partners with the partner in charge Jimmy Pengestu, SE, with audit opinion of fair in all material respects according to the report No. 00704/2.1025/AU.1/07/1124-1/1/IV/2020 dated 27 April 2020, which thereby, releasing members of the Board of Commissioners and Board of Directors of the Bank from all responsibilities and liabilities (*acquit et de charge*) for the management and supervision actions carried out by the Board of Commissioners and the Board of Directors during the 2019 fiscal year, provided that their actions are included in the balance sheet and profit loss statement of the Bank for the 2019 fiscal year.
- Memberi kuasa dan wewenang kepada PT Victoria Investama Tbk selaku Pemegang Saham dalam Bank untuk menetapkan besarnya honorarium anggota Dewan Komisaris untuk tahun 2020; dan
  - Menyetujui pelimpahan wewenang kepada Dewan Komisaris Bank untuk menetapkan besarnya gaji dan tunjangan anggota Direksi untuk tahun 2020.
- Granted power and authority to PT Victoria Investama Tbk as the shareholder of the Bank to determine the honorarium amount for Board of Commissioners' members for the year 2020; and
  - Approved the delegation of authority to the Bank's Board of Commissioners to determine the amount of salary and allowance for Board of Directors' members for the year 2020.

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### Hasil Keputusan RUPS Tahun 2020 Resolutions of Annual GMS 2020

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Memberikan wewenang kepada Dewan Komisaris Bank untuk menunjuk akuntan publik independen dari kantor akuntan publik independen yang terdaftar di Otoritas Jasa Keuangan sehubungan dengan masih dalam proses penentuan akuntan publik yang akan mengaudit buku Bank dengan kriteria:

1. Akuntan publik dan kantor akuntan publik wajib terdaftar pada Otoritas Jasa Keuangan;
2. Kantor akuntan publik merupakan salah satu anggota dari *big four* dan akuntan publik; serta
3. Kantor akuntan publik merupakan pihak yang independen dan profesional untuk mengaudit Laporan Keuangan Bank untuk tahun buku 2020 dengan memperhatikan rekomendasi dari Komite Audit.

Melimpahkan kewenangan kepada Dewan Komisaris untuk menetapkan jumlah honorarium dan persyaratan lain sehubungan dengan penunjukan kantor akuntan publik dimaksud.

Granted authority to the Bank's Board of Commissioners to appoint an independent public accountant from the independent public accounting firms registered with the Financial Services Authority, in relation to the ongoing process of determining an Independent Public Accountant that will audit the Bank's books under the following criteria:

1. Public accountant and public accounting firm must be registered with the Financial Services Authority;
2. The public accounting firm must be a member of the big four accounting firms; and
3. Public accounting firm is an independent and professional party to audit the Bank's Financial Statements for the 2020 fiscal year with due observance of recommendations from the Audit Committee.

Granted authority to the Board of Commissioners to determine the honorarium amount and other requirements in relation to the appointment of such public accounting firm.

Laporan realisasi penggunaan dana:

1. Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019; dan
2. Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I dan II Tahun 2019 serta Tahap III Tahun 2020.

Agenda keempat dalam rapat bersifat laporan dan tidak mengambil keputusan.

Report of realization of proceeds use:

1. Bank Victoria Continuing Bonds II Phase I Year 2019; and
2. Bank Victoria Continuing Subordination Bonds II Phase I and II Year 2019 as well as Phase III Year 2020.

Item number four of the meeting agenda related to a report, and therefore, did not need to adopt a resolution.

1. Menyetujui perubahan dan penyusunan kembali Anggaran Dasar Bank dalam rangka penyesuaian dengan Peraturan Otoritas Jasa Keuangan No. 15/POJK.04/2020 tentang Rencana dan Penyelenggaraan Rapat Umum Pemegang Saham Perusahaan Terbuka No. 16/POJK.04/2020 tentang Pelaksanaan Rapat Umum Pemegang Saham Perusahaan Terbuka Secara Elektronik dan No. 17/POJK.04/2020 tentang Transaksi Material dan Perubahan Kegiatan Usaha; serta
  2. Memberikan kuasa kepada Direksi Bank dengan hak substitusi untuk menyatakan keputusan rapat mengenai perubahan Anggaran Dasar Bank dalam akta tersendiri di hadapan notaris, melakukan pengurusan persetujuan dan/atau penerimaan pemberitahuan kepada Menteri Hukum dan Hak Asasi Manusia Republik Indonesia, serta melakukan segala tindakan yang diperlukan sehubungan dengan keputusan tersebut di atas.
1. Approved the amendments to and reformulation of the Bank's Articles of Association in the framework of adjustments to the Financial Services Authority Regulations No. 15/POJK.04/2020 on Planning and Organizing General Meeting of Shareholders of Public Companies, No. 16/POJK.04/2020 on Convening General Meeting of Shareholders of Public Companies Electronically, and No. 17/POJK.04/2020 on Material Transactions and Changes in Main Business Activities; and
  2. Granted power to the Bank's Board of Directors with substitution rights to state the meeting resolutions on the amendments to the Articles of Association of the Bank in a separate deed, made before a notary, to process the approval by and/or notification of submission to the Minister of Law and Human Rights of the Republic of Indonesia, and to take all actions deemed necessary in connection with the above resolutions.
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### Realisasi Keputusan RUPS Tahunan 19 Juni 2020

#### Realization of Annual GMS 19 June 2020 Resolutions

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**Seluruh keputusan RUPS tersebut telah direalisasikan sepenuhnya.**  
All of the above GMS Resolutions are fully realized.

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## Dewan Komisaris Board of Commissioners

Dewan Komisaris merupakan organ perusahaan yang bertugas dan bertanggung jawab secara kolektif untuk melakukan pengawasan dan memberikan nasihat kepada Direksi serta memastikan bahwa Bank melaksanakan GCG pada seluruh tingkatan atau jenjang organisasi. Dalam melaksanakan tugas dan tanggung jawabnya, Dewan Komisaris bertindak secara independen dan dibantu oleh komite-komite yang mendukung pelaksanaan fungsi pengawasan.

The Board of Commissioners is a Company's organ having the collective supervisory and advisory duties and responsibilities to the Board of Directors and ensuring that the Bank implements GCG in every organizational level. In performing its duties and responsibilities, the Board of Commissioners acts independently and is assisted by the committees supporting the implementation of supervision function.

### Pedoman Dewan Komisaris

Pelaksanaan tugas dan tanggung jawab Dewan Komisaris berpedoman pada *Board of Commissioners Charter (BOC Charter)* yang telah dimutakhirkan melalui Surat Keputusan Dewan Komisaris No. 001/SK-KOM/01/20 tanggal 10 Januari 2020. Penyusunan BOD *Charter* Bank Victoria mengacu pada Undang-Undang Perseroan Terbatas, Akta Pernyataan RUPS Luar Biasa No. 134 Tahun 2015, Surat Edaran Bank Indonesia tentang Pelaksanaan *Good Corporate Governance* bagi Bank Umum, Peraturan Otoritas Jasa Keuangan tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik, serta Peraturan Otoritas Jasa Keuangan tentang Tata Kelola bagi Bank Umum.

### Board of Commissioners Charter

Implementation of the Board of Commissioners' duties and responsibilities refers to the Board of Commissioners Charter (BOC Charter), which has been updated through the Board of Commissioners' Decision Letter No. 001/SK-KOM/01/20 dated 10 January 2020. The preparation of Bank Victoria's BOC Charter refers to the Company Law, Deed of Statement of Extraordinary GMS No. 134 of 2015, Bank Indonesia Circular on Implementation of Good Corporate Governance for Commercial Banks, Financial Services Authority Regulations on Board of Directors and Board of Commissioners of Issuers and Public Companies, and Financial Services Authorities Regulations on Governance of Commercial Banks.

### Tugas dan Tanggung Jawab Dewan Komisaris

Tugas dan tanggung jawab berdasarkan BOC *Charter* beserta realisasinya diuraikan sebagai berikut.

### Duties and Responsibilities of the Board of Commissioners

Based on BOC Charter, the duties, responsibilities, and realization are described as follows.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p><b>Tugas dan Tanggung Jawab secara Umum:</b> Duties and Responsibilities in General:</p> <p>Menetapkan tugas dan wewenang setiap anggota Direksi sebagaimana isi Anggaran Dasar. To determine duties and authority of each member of Board of Directors as stipulated in the Articles of Association.</p> <p>Memberikan pengesahan tentang arah kebijakan, strategi usaha dari Rencana Bisnis Bank, baik rencana jangka pendek (program kerja tahunan), jangka menengah, maupun jangka panjang yang wajib dilaporkan kepada Otoritas Jasa Keuangan. To approve the policy direction, business strategy of the Bank's Business Plan, either short-term (annual work plan), medium-term, and long-term plans, which must be reported to the Financial Services Authority.</p>	<p>Menetapkan tugas dan wewenang untuk setiap anggota Direksi yang diatur dalam Surat Keputusan Dewan Komisaris. Establishing duties and authority of each member of the Board of Directors as outlined in the Board of Commissioners' Decision Letter.</p> <p>Mengesahkan Rencana Bisnis Bank Periode Tahun 2021-2023 yang memuat tentang kebijakan dan strategi manajemen; penerapan manajemen risiko dan kinerja Bank saat ini; proyeksi Laporan Keuangan (2021-2023) beserta asumsi yang digunakan; proyeksi rasio-rasio dan pos-pos tertentu lainnya; rencana pendanaan, penanaman dana, permodalan dan penyertaan permodalan, pengembangan organisasi dan sumber daya manusia, penerbitan produk dan/atau pelaksanaan aktivitas baru, pengembangan dan/atau perubahan jaringan kantor, kegiatan sebagai bank umum devisa; serta informasi lainnya.</p>

Tugas dan Tangung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	Ratifying the Bank's Business Plan for 2021-2023 Period, which contains management policies and strategies; risk management implementation and current performance of the Bank; Financial Statements projections (2021-2023) along with the assumptions used; projections of certain ratios and other items; plans for funding, investments, capital, and equity participation, organizational development and human resources, product issuance and/or implementation of new activities, development and/or change of office network, activities as a foreign exchange commercial bank; and other information.
Melakukan pengawasan atas pelaksanaan maupun pencapaian rencana bisnis. To supervise the implementation and achievement of the business plan.	Melakukan pengawasan atas pelaksanaan maupun pencapaian rencana bisnis dengan hasil pengawasan bahwa rencana bisnis tahun 2021 dapat memenuhi target ditetapkan. Supervising the implementation and achievement of the business plan with supervision results that the 2021 business plan can meet the set targets.
Memberikan keputusan tertulis disertai dengan alasan-alasan atas transaksi-transaksi yang diusulkan yang melampaui batas wewenang Direksi. Providing a written decision accompanied by reasons for the proposed transactions that exceed the limits of the Board of Directors' authority.	Memberikan keputusan tertulis disertai dengan alasan-alasan atas transaksi-transaksi yang diusulkan yang melampaui batas wewenang Direksi. Provided written statement accompanied by reasons for the proposed transactions that exceed the limits of the Board of Directors' authority.
Menyetujui dan mengevaluasi kebijakan manajemen risiko serta mengevaluasi pertanggungjawaban pelaksanaan manajemen risiko. To approve and evaluate the risk management policy and evaluate the accountability of risk management implementation.	Menyetujui dan mengevaluasi kebijakan manajemen risiko, seperti Prosedur Penilaian Profil Risiko dan Prosedur Penilaian Profil Risiko Terintegrasi. Approving and evaluating risk management policies, such as Risk Profile Assessment Procedure and Integrated Risk Profile Assessment Procedure.
Menyelenggarakan rapat internal Dewan Komisaris, sekurang-kurangnya 4 (empat) kali dalam 1 (satu) tahun, sesuai dengan ketentuan GCG. To conduct internal meetings of the Board of Commissioners, at least 4 (four) times a year, in accordance with the provisions of GCG.	Melaksanakan rapat internal sebanyak 6 (enam) kali. Held 6 (six) internal meetings.
Menghadiri rapat gabungan dengan Direksi untuk membahas perkembangan dari Laporan Kinerja Direksi minimal 1 (satu) kali dalam 4 (empat) bulan. To attend a joint meeting with the Board of Directors to discuss progress of the Board of Directors Performance Report at least 1 (once) in 4 (four) months.	Menghadiri rapat gabungan dengan Direksi sebanyak 12 kali. Attending 12 joint meetings with the Board of Directors.
Membuat laporan Dewan Komisaris kepada Otoritas Jasa Keuangan pada setiap akhir semester perihal pengelolaan dan kinerja Bank, termasuk pencapaian target-target rencana bisnis tahunan yang wajib disampaikan dalam batas waktu 2 (dua) bulan setelah bulan laporan. To make a report of the Board of Commissioners to the Financial Services Authority at the end of each semester on the Bank's management and performance, including the achievement of the annual business plan targets that must be submitted within 2 (two) months after the reporting month.	Membuat dan menyampaikan laporan terkait target-target rencana bisnis tahunan kepada Otoritas Jasa Keuangan yang disampaikan dalam batas waktu 2 (dua) bulan setelah bulan laporan. Created and submitted report related to the targets of annual business plan to the Financial Services Authority which submitted within 2 (two) months of the reporting month.
Menyampaikan laporan kepada Otoritas Jasa Keuangan paling lambat 7 (tujuh) hari sejak ditemukan: 1. Pelanggaran peraturan perundang-undangan di bidang keuangan dan perbankan; dan/atau 2. Keadaan atau perkiraan keadaan yang dapat membahayakan kelangsungan usaha Bank. To submit report to the Financial Services Authority no later than 7 (seven) business days after any of the following matter is found: 1. Violation of laws and regulations in finance and banking sectors; and/or 2. Condition or assumed condition that may endanger the Bank's business continuity.	Tidak terdapat pelanggaran peraturan perundang-undangan yang dilakukan oleh Bank. The Bank did not violate any laws and regulations.
<b>Tugas dan Kewajiban terkait Evaluasi Kinerja Dewan Komisaris dan Direksi:</b> Duties and Obligations related to Performance Evaluation of Board of Commissioners and Board of Directors:	
Menyusun <i>Key Performance Indicators</i> (KPI) Dewan Komisaris. To develop Key Performance Indicators (KPI) of the Board of Commissioners.	Pada tahun 2021, Dewan Komisaris tidak menyusun KPI berdasarkan Dewan Komisaris. In 2021, the Board of Commissioners did not prepare KPI based on the Board of Commissioners.
Melakukan evaluasi kinerja Dewan Komisaris berdasarkan KPI Dewan Komisaris dengan sistem penilaian sendiri atau sistem lain untuk kemudian diputuskan dalam rapat Dewan Komisaris. To evaluate the performance of the Board of Commissioners based on KPI of Board of Commissioners by self-assessment system or other system to be determined in the Board of Commissioners' meeting.	Mengevaluasi kinerja Dewan Komisaris dengan sistem penilaian sendiri dengan hasil penilaian sendiri aspek pelaksanaan tugas pada tahun 2021 memperoleh nilai komposit "2 (dua)" dengan kategori "baik". Evaluating the Board of Commissioners' performance with a self-assessment system of which the self-assessment results of the task implementation aspect in 2021 obtained a composite score of "2 (two)" under "good" category.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Memberikan tanggapan dan rekomendasi mengenai penetapan KPI Direksi pada setiap awal tahun kerja.</p> <p>To provide responses and recommendations on KPI establishment for Board of Directors at the beginning of each business year.</p>	<p>Memberikan tanggapan dan rekomendasi mengenai penetapan KPI Direksi terkait terlaksananya kepemimpinan, kerja sama, komunikasi, dan kompetensi secara baik; pencapaian Rencana Bisnis Bank secara baik; terlaksananya proses GCG dalam setiap kegiatan usaha Bank secara baik; serta terlaksananya tindak lanjut atas temuan audit, rekomendasi Satuan Kerja Audit Internal (SKAI) Bank, auditor eksternal, atau hasil pengawasan Otoritas Jasa Keuangan.</p> <p>Provided responses and recommendations on Board of Directors' KPI related to the proper implementation of leadership, cooperation, communication and competency; proper Bank Business Plan achievement; proper implementation of GCG process in each of the Bank's activities; and proper implementation of follow-up on audit findings, recommendation of the Bank's Internal Audit Work Unit (SKAI), external auditor, or Financial Services Authority supervision result.</p>
<p>Melakukan evaluasi atas kinerja Direksi berdasarkan KPI Direksi dan memberikan tanggapan kepada Direksi, selanjutnya menyampaikan rekomendasi kepada RUPS.</p> <p>To evaluate the Board of Directors' performance based on the Board of Directors' KPI and respond to the Board of Directors, then submit the recommendation to the GMS.</p>	<p>Mengevaluasi kinerja Direksi bahwa pelaksanaan tugas Direksi telah sesuai dengan BOD <i>Charter</i> dan peraturan perundang-undangan yang berlaku.</p> <p>Evaluated the Board of Directors' performance, that the Board of Directors' duty implementation is in line with the BOD Charter and the prevailing laws and regulations.</p>

## Ruang Lingkup Pekerjaan dan Tanggung Jawab Masing-Masing Anggota Dewan Komisaris

Berdasarkan Surat Keputusan Dewan Komisaris No. 02/SK-KOM/12/18 tanggal 3 Desember 2018 tentang Pembagian Tugas dan Wewenang Anggota *Board of Commissioners* PT Bank Victoria International Tbk, tugas dan tanggung jawab masing-masing Dewan Komisaris Bank sebagai berikut.

## Scope of Work and Responsibilities of each Member of the Board of Commissioners

Based on the Board of Commissioners' Decision Letter No. 02/SK-KOM/12/18 dated 3 December 2018 on Division of Duties and Authorities of the Board of Commissioners' Members of PT Bank Victoria International Tbk, the duties and responsibilities of each member of the Bank's Board of Commissioners are as follows.

### Oliver Simorangkir Komisaris Utama President Commissioner

1. *Treasury & International Banking*;
2. *Finance & Accounting*;
3. *Operations*;
4. *Loan Operations*;
5. *Corporate Legal*; dan
6. *Credit Legal*.

1. *Treasury & International Banking*;
2. *Finance & Accounting*;
3. *Operations*;
4. *Loan Operations*;
5. *Corporate Legal*; and
6. *Credit Legal*.

### Gunawan Tenggarahardja Komisaris/Komisaris Independen Commissioner/Independent Commissioner

1. *Perkreditan*;
2. *Retail Banking, Branch Banking Network & Performance*;
3. *SKAI/Integrated & Anti Fraud*;
4. *Information Technology (IT)*; dan
5. *Human Capital Management & General Affair*.

1. *Credit*;
2. *Retail Banking, Branch Banking Network & Performance*;
3. *SKAI/Integrated & Anti Fraud*;
4. *Information Technology (IT)*; and
5. *Human Capital Management & General Affair*.

### Zaenal Abidin, PhD Komisaris/Komisaris Independen Commissioner/Independent Commissioner

1. *Good Corporate Governance*;
2. *Compliance, KYC/Integrated and System Procedure*;
3. *Risk Management/Integrated*; serta
4. *Tata Kelola Terintegrasi/Integrated Corporate Governance*.

1. *Good Corporate Governance*;
2. *Compliance, KYC/Integrated and System Procedure*;
3. *Risk Management/Integrated*; and
4. *Integrated Corporate Governance*.

## Komposisi Dewan Komisaris

Komposisi anggota Dewan Komisaris berdasarkan BOC *Charter* minimal berjumlah 3 (tiga) orang termasuk Komisaris Independen, yang terdiri dari 1 (satu) orang Komisaris Utama dan 2 (dua) orang Komisaris atau lebih. Masa jabatan Dewan Komisaris Bank adalah 3 (tiga) tahun sejak diangkat dalam RUPS dengan tidak mengurangi hak RUPS untuk memberhentikan Dewan Komisaris sewaktu-waktu dengan memperhatikan ketentuan Anggaran Dasar.

Setiap anggota Dewan Komisaris Bank harus memenuhi persyaratan sebagai berikut.

1. Persyaratan Formal
  - a. Cakap melakukan perbuatan hukum;
  - b. Dalam 5 (lima) tahun sebelum pengangkatan dan selama menjabat:
    - 1) Tidak pernah dinyatakan pailit;
    - 2) Tidak pernah menjadi anggota Dewan Komisaris yang dinyatakan bersalah menyebabkan suatu bank dinyatakan pailit;
    - 3) Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan; serta
    - 4) Tidak pernah menjadi anggota Dewan Komisaris yang selama menjabat:
      - Pernah tidak menyelenggarakan RUPS Tahunan;
      - Pertanggungjawabannya sebagai anggota Dewan Komisaris pernah tidak diterima oleh RUPS atau pernah tidak memberikan pertanggungjawaban sebagai anggota Dewan Komisaris kepada RUPS; dan
      - Pernah menyebabkan Bank yang memperoleh izin, persetujuan, atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan Laporan Tahunan dan/atau Laporan Keuangan kepada Otoritas Jasa Keuangan.
2. Persyaratan Material
  - a. Mempunyai akhlak, moral, dan integritas yang baik;
  - b. Memiliki komitmen untuk mematuhi peraturan perundang-undangan; dan
  - c. Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan untuk menjalankan tugasnya.
3. Persyaratan lainnya
  - a. Anggota Dewan Komisaris tidak diperkenankan merangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris, atau Pejabat Eksekutif pada lembaga keuangan (bank atau non-bank) dan pada lebih dari 1 (satu) perusahaan bukan lembaga keuangan baik yang berkedudukan di dalam negeri atau luar negeri;

## Composition of the Board of Commissioners

Composition of the Board of Commissioners' members according to the BOC Charter must at least comprise 3 (three) members including the Independent Commissioner, and consists of 1 (one) President Commissioner and 2 (two) Commissioners or more. Term of office of the Board of Commissioners is 3 (three) years effective from the appointment in the GMS, without prejudice to the GMS' right to dismiss the Board of Commissioners at any given time with due observance of the Articles of Association.

Each member of the Bank's Board of Commissioners must meet the following requirements.

1. Formal Requirements
  - a. Capable in performing legal actions;
  - b. Within 5 (five) years before appointment and during the term of office:
    - 1) Never been declared bankrupt;
    - 2) Never become a member of Board of Commissioners who is found guilty of causing a bank to be declared bankrupt;
    - 3) Never been punished for committing a criminal act that is detrimental to state finances and/or related to the financial sector; and
    - 4) Never been a member of Board of Commissioners who during the term of office:
      - Has ever not convening an Annual GMS;
      - Has ever had his/her accountability as the member of Board of Commissioners rejected by the GMS or has ever been absent in giving his/her accountability as the member of Board of Commissioners to the GMS; and
      - Has ever caused a Bank that obtains permit, approval, or registration from the Financial Services Authority not to fulfill its obligation to submit its Annual Report and/or Financial Statements to the Financial Services Authority.
2. Material Requirements
  - a. Have good character, morals, and integrity;
  - b. Has a commitment to comply with the laws and regulations; and
  - c. Has knowledge and/or expertise in the field required to perform the duties.
3. Other requirements
  - a. Members of the Board of Commissioners are not allowed to concurrently hold position as a member of Board of Directors, member of Board of Commissioners, or Executive Officer in other financial institutions (bank or non-bank) and in more than 1 (one) non-financial institutions, either in Indonesia or overseas;



- b. Anggota Dewan Komisaris tidak termasuk rangkap jabatan apabila menjabat sebagai Direksi, anggota Dewan Komisaris, atau Pejabat Eksekutif yang melaksanakan fungsi pengawasan pada 1 (satu) Entitas Anak Bank yang dikendalikan oleh Bank (konsolidasi); dan
- c. Komisaris non-independen tidak termasuk rangkap jabatan dalam menjalankan tugas fungsional dari Pemegang Saham yang berbentuk badan hukum pada kelompok usaha Bank.
- b. Members of the Board of Commissioners do not hold concurrent position if holding a position as the Board of Directors, members of Board of Commissioners, or Executive Officer performing the supervision function in 1 (one) of the Bank's subsidiary controlled by the Bank (consolidated); and
- c. Non-independent Commissioner does not hold a concurrent position in performing its functional duty from a legal entity Shareholder in the Banking business group.

Mengacu pada ketentuan dan persyaratan tersebut, Dewan Komisaris Bank Victoria beranggotakan 3 (tiga) orang, yang terdiri dari 1 (satu) orang Komisaris Utama, dan 2 (dua) orang Komisaris Independen. Berikut komposisi keanggotaan Dewan Komisaris Bank per 31 Desember 2021.

Referring to the above provisions and requirements, Bank Victoria's Board of Commissioners has 3 (three) members, comprises 1 (one) President Commissioner, and 2 (two) Independent Commissioners. The following is the composition of the Bank's Board of Commissioners members as of 31 December 2021.

<b>Nama Name</b>	<b>Jabatan Position</b>	<b>Dasar Pengangkatan Pertama Kali dan Periode Menjabat Basis of First Appointment and Term of Office</b>	<b>Dasar Pengangkatan Kembali dan Periode Menjabat Basis of Re-Appointment and Term of Office</b>
Oliver Simorangkir	Komisaris Utama President Commissioner	Keputusan RUPS Tahunan tanggal 26 Juni 2015 (2015-2016) Annual GMS Resolutions dated 26 June 2015 (2015-2016)	Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019) Annual GMS Resolution dated 24 June 2016 (2016-2019) Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022) Annual GMS Resolutions dated 10 May 2019 (2019-2022)
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/ Independent Commissioner	Keputusan RUPS Luar Biasa tanggal 24 Februari 2003 (2003-2007) Extraordinary GMS Resolutions dated 24 February 2003 (2003-2007)	Keputusan RUPS Luar Biasa tanggal 19 Desember 2007 (2007-2010) Extraordinary GMS Resolutions dated 19 December 2007 (2007-2010) Keputusan RUPS Tahunan tanggal 25 Juni 2010 (2010-2013) Annual GMS Resolutions dated 25 June 2010 (2010-2013) Keputusan RUPS Tahunan tanggal 28 Juni 2013 (2013-2016) Annual GMS Resolutions dated 28 June 2013 (2013-2016) Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019) Annual GMS Resolution dated 24 June 2016 (2016-2019) Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022) Annual GMS Resolution dated 10 May 2019 (2019-2022)
Zaenal Abidin, PhD	Komisaris/Komisaris Independen Commissioner/ Independent Commissioner	Keputusan RUPS Tahunan tanggal 29 Juni 2012 (2012-2013) Annual GMS Resolutions dated 29 June 2012 (2012-2013)	Keputusan RUPS Tahunan tanggal 28 Juni 2013 (2013-2016) Annual GMS Resolutions dated 28 June 2013 (2013-2016) Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019) Annual GMS Resolution dated 24 June 2016 (2016-2019) Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022) Annual GMS Resolution dated 10 May 2019 (2019-2022)

Anggota Dewan Komisaris yang menjabat wajib memperoleh persetujuan (melalui *fit and proper test*) dari Otoritas Jasa Keuangan sebelum menjalankan tindakan, tugas, dan fungsinya sebagai Dewan Komisaris sesuai dengan Peraturan Otoritas Jasa Keuangan No. 27/POJK.03/2016 tentang Penilaian Kemampuan dan Kepatutan bagi pihak utama Lembaga Jasa Keuangan. Hal ini berguna untuk membuktikan bahwa anggota Dewan Komisaris telah memiliki integritas, kompetensi, dan reputasi keuangan yang memadai. Berikut informasi pelaksanaan *fit and proper test* Dewan Komisaris.

Members of the Board of Commissioners holding the position must obtain approval (through *fit and proper test*) from the Financial Services Authority prior to carrying out their actions, duties, and functions as the Board of Commissioners in accordance with Financial Services Authority Regulation No. 27/POJK.03/2016 on Fit and Proper Test for Key Parties of Financial Services Institution. This is to indicate that members of Board of Commissioners have adequate integrity, competencies, and financial reputation. Information on the implementation of *fit and proper test* for the Board of Commissioners is described as follows.



Nama Name	Jabatan Position	Pelaksana Organizer	Hasil Result	Tanggal Efektif Effective Date
Oliver Simorangkir	Komisaris Utama President Commissioner	Otoritas Jasa Keuangan Financial Services Authority	Lulus Pass	15 September 2015
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/ Independent Commissioner	Bank Indonesia	Lulus Pass	<ul style="list-style-type: none"> <li>• Sebagai Komisaris: 22 April 2003</li> <li>• Sebagai Komisaris Independen: 13 September 2007</li> <li>• As Commissioner: 22 April 2003</li> <li>• As Independent Commissioner: 13 September 2007</li> </ul>
Zaenal Abidin, PhD	Komisaris/Komisaris Independen Commissioner/ Independent Commissioner	Bank Indonesia	Lulus Pass	27 September 2012

### Program Orientasi bagi Anggota Dewan Komisaris Baru dan Peningkatan Kapabilitas Dewan Komisaris

Program orientasi bagi anggota Dewan Komisaris baru Bank Victoria dilakukan sebagai berikut.

1. Untuk anggota Dewan Komisaris yang baru diangkat, wajib diberikan Program Pengenalan mengenai kondisi Bank secara umum;
2. Penanggungjawab atas program pengenalan tersebut adalah Sekretaris Perusahaan atau siapapun yang menjalankan fungsi sebagai Sekretaris Perusahaan;
3. Peningkatan kapabilitas dinilai penting agar Dewan Komisaris dapat selalu memperbarui informasi tentang perkembangan terkini dari bisnis Bank dan peraturan perundang-undangan yang berlaku dan sebagai bentuk antisipasi atas masalah yang timbul di kemudian hari bagi keberlangsungan dan kemajuan Bank;
4. Program orientasi bagi Komisaris baru meliputi dan tidak terbatas pada hal-hal berikut ini:
  - a. Pemberian Informasi yang terdapat pada situs laman Bank;
  - b. Pengenalan tentang seluruh sistem dan prosedur yang terdapat pada intranet Bank Victoria;
  - c. Membawa keliling ke kantor cabang-kantor cabang terutama kantor cabang besar; dan
  - d. Menginformasikan hal-hal yang terdapat di dalam Laporan Tahunan.

### Orientation Program for New Members of Board of Commissioners and Competency Development for the Board of Commissioners

Orientation program for Bank Victoria's new members of Board of Commissioners is carried out as follows.

1. For newly appointed members of the Board of Commissioners, an Orientation Program regarding the Bank's condition in general must be provided;
2. Person in charge of this orientation program is the Corporate Secretary, or anyone who performs such function as a Corporate Secretary;
3. Competency development is deemed important so that the Board of Commissioners can always update the information on the latest developments on the Bank's business and the applicable laws and regulations, and as a form of anticipation of problems arising in the future that can affect the Bank's sustainability and progress;
4. The orientation program for the new Commissioner includes and is not limited to the following matters:
  - a. Provision of information contained on the Bank's website;
  - b. Introduction to all systems and procedures contained in the intranet of Bank Victoria;
  - c. To take them for a visit to branch offices, especially to large branch offices; and
  - d. To inform them on all matters contained in the Annual Report.

**Pada tahun 2021, tidak ada perubahan dan pengangkatan Dewan Komisaris baru, sehingga program orientasi bagi Dewan Komisaris yang baru diangkat tidak dilaksanakan.**

**In 2021, there was no change and no appointment of new Board of Commissioners, and therefore, orientation program for newly appointed members of Board of Commissioners was not carried out.**

Informasi mengenai pengembangan kompetensi yang dilakukan Dewan Komisaris selama tahun 2021 dapat dilihat pada bab Profil Perusahaan dalam Laporan Tahunan ini.

Information regarding competency development for Board of Commissioners throughout 2021 can be seen in the Company's Profile in this Annual Report.

## Komisaris Independen

Komisaris Independen adalah anggota Dewan Komisaris yang tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham dan/atau hubungan keluarga dengan anggota Direksi, anggota Dewan Komisaris lain dan/atau Pemegang Saham Pengendali, atau hubungan dengan Bank yang dapat mempengaruhi kemampuan yang bersangkutan untuk bertindak independen. Berdasarkan BOD *Charter*, Komisaris Independen Bank ditetapkan paling kurang 50,00% dari jumlah anggota Dewan Komisaris.

**Pada tahun 2021, Jumlah anggota Komisaris Independen Bank sebanyak 2 (dua) orang atau sebanyak 66,67% dari total keseluruhan anggota Dewan Komisaris sebanyak 3 (tiga) orang.**

**In 2021, total number of the Bank's Independent Commissioners was 2 (two) personnel or equal to 66.67% of the total members of the Board of Commissioners which comprised 3 (three) personnel.**

## Persyaratan Komisaris Independen

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 tentang Penerapan Tata Kelola bagi Bank Umum, persyaratan Komisaris Independen Bank sebagai berikut.

1. Tidak memiliki hubungan keuangan dengan anggota Direksi, anggota Dewan Komisaris lain, dan/atau Pemegang Saham Pengendali, yakni tidak menerima penghasilan, bantuan keuangan, atau pinjaman dari:
  - a. Anggota Direksi dan/atau anggota Dewan Komisaris Bank;
  - b. Perusahaan yang Pemegang Saham Pengendalinya adalah anggota Direksi dan/atau anggota Dewan Komisaris Bank; dan/atau
  - c. Pemegang Saham Pengendali Bank.
2. Tidak memiliki hubungan kepengurusan dengan anggota Direksi, anggota Dewan Komisaris lain, dan/atau Pemegang Saham Pengendali, yakni tidak menduduki jabatan sebagai:
  - a. Anggota Direksi atau anggota Dewan Komisaris pada perusahaan yang anggota Dewan Komisarisnya menjadi anggota Direksi dan/atau anggota Dewan Komisaris Bank;
  - b. Anggota Direksi atau anggota Dewan Komisaris pada perusahaan yang Pemegang Saham Pengendalinya adalah anggota Direksi dan/atau anggota Dewan Komisaris Bank; dan/atau
  - c. Anggota Direksi, anggota Dewan Komisaris, atau Pejabat Eksekutif pada perusahaan Pemegang Saham Pengendali Bank.
3. Tidak memiliki hubungan kepemilikan dengan anggota Direksi, anggota Dewan Komisaris lain, dan/atau Pemegang Saham Pengendali, yakni tidak menjadi Pemegang Saham pada:
  - a. Perusahaan yang secara bersama-sama dimiliki oleh anggota Direksi, anggota Dewan Komisaris, dan/atau Pemegang Saham Pengendali Bank sehingga

## Independent Commissioner

Independent Commissioner is a member of the Board of Commissioners who does not have any financial, management, shareholding, and/or family relationship with members of Board of Directors or other members of Board of Commissioners, and/or Controlling Shareholders, or any relationship with the Bank which might affect the relevant person's capacity to act independently. Based on BOD *Charter*, the Bank's Independent Commissioner comprises at least 50.00% of the total number of the Board of Commissioners

## Requirements for Independent Commissioner

Pursuant to Financial Services Authority Regulation No. 55/POJK.03/2016 on the Implementation of Governance for Commercial Banks, requirements to be the Bank's Independent Commissioner are as follows.

1. Not having financial relationship with member of Board of Directors, other members of Board of Commissioners, and/or Controlling Shareholders, which means not receiving income, financial aid, or loans from:
  - a. Members of Board of Directors and/or members of Board of Commissioners of the Bank;
  - b. Company in which the Controlling Shareholders are members of Board of Directors and/or members of Board of Commissioners of the Bank; and/or
  - c. The Bank's Controlling Shareholders.
2. Not having management relationship with member of Board of Directors, other members of Board of Commissioners, and/or Controlling Shareholders, which means not having positions as:
  - a. A member of Board of Directors or a member of Board of Commissioners in a company in which the members of Board of Commissioners become members of Board of Directors and/or members of Board of Commissioners of the Bank;
  - b. A member of Board of Directors or a member of Board of Commissioners in a company in which the Controlling Shareholders are members of Board of Directors and/or members of Board of Commissioners of the Bank; and/or
  - c. A member of Board of Directors, a member of Board of Commissioners, or an Executive Officer of the Controlling Shareholders' Company of the Bank.
3. Not having ownership relationship with members of Board of Directors, other members of Board of Commissioners, and/or Controlling Shareholders, which means not a Shareholder of:
  - a. A company jointly owned by members of Board of Directors, members of Board of Commissioners, and/or Controlling Shareholders of the Bank, and as a

- bersama-sama menjadi Pemegang Saham Pengendali pada perusahaan tersebut; dan/atau
- b. Perusahaan Pemegang Saham Pengendali Bank.
4. Tidak memiliki hubungan keluarga dengan anggota Direksi, anggota Dewan Komisaris lain, dan/atau Pemegang Saham Pengendali, yakni tidak memiliki hubungan keluarga sampai dengan derajat kedua, baik hubungan vertikal maupun hubungan horizontal, termasuk mertua, menantu, dan ipar.
  5. Tidak memiliki hubungan dengan bank yang dapat memengaruhi kemampuan untuk bertindak independen, yakni tidak memiliki hubungan dalam bentuk:
    - a. Kepemilikan saham Bank dengan jumlah kepemilikan lebih dari 5,00% dari modal disetor Bank; dan/atau
    - b. Menerima atau memberi penghasilan, bantuan keuangan, atau pinjaman dari atau kepada Bank yang menyebabkan pihak yang memberi penghasilan, bantuan keuangan atau pinjaman memiliki kemampuan untuk memengaruhi (*controlling influence*) pihak yang menerima penghasilan, bantuan keuangan atau pinjaman, seperti:
      - 1) Pihak terafiliasi; dan/atau
      - 2) Transaksi keuangan dengan Bank yang dapat memengaruhi kelangsungan usaha Bank dan/atau pihak yang melakukan transaksi keuangan.
  6. Mantan anggota Direksi Bank atau mantan Pejabat Eksekutif Bank atau pihak yang mempunyai hubungan dengan Bank, yang dapat memengaruhi kemampuan untuk bertindak independen, tidak dapat menjadi Komisaris Independen pada Bank, sebelum menjalani masa tunggu (*cooling off*) paling singkat 1 (satu) tahun. Ketentuan masa tunggu tersebut tidak berlaku bagi mantan anggota Direksi atau mantan Pejabat Eksekutif yang memiliki tugas hanya melakukan fungsi pengawasan paling sedikit 1 (satu) tahun.

Komisaris Independen yang telah menjabat selama 2 (dua) periode masa jabatan berturut-turut dapat diangkat kembali pada periode selanjutnya sebagai Komisaris Independen, dalam hal:

1. Rapat anggota Dewan Komisaris menilai bahwa Komisaris Independen tetap dapat bertindak independen; dan
2. Komisaris Independen menyatakan dalam RUPS mengenai independensi yang bersangkutan.

- consequence, become a joint Controlling Shareholders of such company; and/or
- b. A company that is the Bank's Controlling Shareholders.
4. Not having family relationship with members of Board of Directors, other members of Board of Commissioners, and/or Controlling Shareholders, which means not having family relationship up to the second degree, either vertical or horizontal relationships, including parent in-laws, son/ daughter in-laws, and brother/sister in-laws.
  5. Not having relationship with any bank that may affect the ability to act independently, which means not having relationship in the forms of:
    - a. Shareholding of the Bank with more than 5.00% ownership of the paid-up capital of the Bank; and/or
    - b. Receiving or giving income, financial aid, or loans from or to the Bank that causes the party giving the income, financial aid, or loans that has a controlling influence to the party receiving the income, financial aid, or loans such as:
      - 1) Affiliated parties; and/or
      - 2) Financial transactions with the Bank that may affect the Bank's business continuity and/or the party making the financial transaction.
  6. Former member of the Board of Directors or former Executive Officer of the Bank or any party affiliated with the Bank, who may affect the ability to act independently, may not become an Independent Commissioner at the Bank, before a cooling off period of at least 1 (one) year. The stipulation of such waiting period does not apply to former member of Board of Directors or former Executive Officers who has the duty of performing supervisory functions for at least 1 (one) year.

Independent Commissioner who has served for 2 (two) consecutive terms of office may be re-appointed in the subsequent period as an Independent Commissioner. In the event that:

1. The Board of Commissioners' meeting is of an opinion that the Independent Commissioner can still act independently; and
2. The Independent Commissioner declares his/her independency in the GMS.

**Pernyataan Independensi Masing-Masing Komisaris Independen**  
**Statement of Independency from Each Independent Commissioner**

Aspek Independensi Independency Aspect	Gunawan Tenggarahardja	Zaenal Abidin, PhD
Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan Bank dalam waktu 6 (enam) bulan terakhir, kecuali untuk pengangkatan kembali sebagai Komisaris Independen Bank pada periode berikutnya. Not being employed nor having the authority and responsibility to plan, lead, control, or supervise the Bank's activities within the last 6 (six) months, except for reappointment as the Bank's Independent Commissioner in the next period.	✓	✓
Tidak mempunyai saham baik langsung maupun tidak langsung pada Bank. Not possessing any shares in the Bank, either directly or indirectly.	✓	✓

Aspek Independensi Independency Aspect	Gunawan Tenggarahardja	Zaenal Abidin, PhD
Tidak mempunyai hubungan afiliasi dengan Bank, anggota Dewan Komisaris, anggota Direksi atau Pemegang Saham Utama Bank. Not having affiliation relationship with the Bank, members of Board of Commissioners, members of Board of Directors, or the Bank's Main Shareholders.	√	√
Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank tersebut. Not having business relationship, either directly or indirectly, that are related to the Bank's business activities.	√	√

### Pernyataan Independensi Komisaris Independen

Terdapat 2 (dua) Komisaris Independen yang telah diangkat kembali setelah menjabat, yaitu Gunawan Tenggarahardja selama 5 (lima) periode masa jabatan dan Zaenal Abidin, PhD selama 3 (tiga) periode masa jabatan. Seluruh Komisaris Independen tersebut telah memberikan pernyataan mengenai independensinya sebelum diangkat kembali dalam RUPS.

### Statement of Independency from Independent Commissioners

There are 2 (two) Independent Commissioners who were re-appointed upon expiry of their position, ie. Gunawan Tenggarahardja for 5 (five) terms of office and Zaenal Abidin, PhD for 3 (three) terms of office. Both Independent Commissioners have given their Statement of Independency prior to being re-appointed in the GMS.

#### SURAT PERNYATAAN INDEPENDENSI PT BANK VICTORIA INTERNATIONAL TBK STATEMENT OF INDEPENDENCY OF PT BANK VICTORIA INTERNATIONAL TBK

Saya yang bertanda tangan di bawah ini / I, the undersigned below :  
 Nama :  
 Name :  
 Tempat/tanggal lahir :  
 Place/date of birth :  
 Alamat domisili (copy KTP/SIM terlampir) :  
 Domicile address (copy of residential ID card/  
 driving license attached) :  
 Nomor telepon rumah :  
 House phone number :  
 Jabatan :  
 Position :  
 Nama perusahaan :  
 Company name :  
 Nomor telepon perusahaan :  
 Company phone number :

Dengan ini menyatakan bahwa saya/ Hereby stating that I :

1. Tidak memiliki hubungan keuangan, hubungan kepengurusan, kepemilikan saham dan/atau hubungan keluarga dengan anggota Dewan Komisaris lainnya, Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank, yang dapat memengaruhi kemampuan saya untuk bertindak Independen sebagaimana diatur dalam ketentuan Pelaksanaan *Good Corporate Governance* bagi Bank Umum.

Do not have any financial relationship, management relationship, shareholding and/or family relationship with other members of Board of Commissioners, Board of Directors, and/or Controlling Shareholders or relationship with the Bank, which may affect my ability to act independently as stipulated in the provisions of Good Corporate Governance Implementation for Commercial Banks.

2. Apabila di kemudian hari, saya ditemukan memiliki hubungan-hubungan sebagaimana dimaksud pada butir 1 (satu) di atas, maka saya bersedia melepaskan jabatan Komisaris Independen saya dan bersedia untuk diganti.

In the event that in the future I am found to have the relationships as referred to in item 1 (one) above, then I am willing to give up my position as an Independent Commissioner and I am willing to be replaced.

(.....)

Gunawan Tenggarahardja

(.....)

Zaenal Abidin, PhD

## Independensi dan Pengelolaan Benturan Kepentingan Dewan Komisaris

Dalam etika jabatan Dewan Komisaris, anggota Dewan Komisaris Bank mengambil sikap, pendapat, dan tindakan harus berdasarkan pada unsur objektivitas, profesional, dan independen demi kepentingan Bank yang seimbang dengan mengutamakan kepentingan para pemangku kepentingan. Di samping itu, berkaitan dengan pengelolaan benturan kepentingan, seluruh anggota Dewan Komisaris dilarang berada dalam situasi atau kondisi tertentu dimana kepentingan anggota Dewan Komisaris bertentangan dengan kepentingan Bank, namun apabila terjadi benturan kepentingan, maka harus diungkapkan serta anggota Dewan Komisaris yang bersangkutan tidak boleh melibatkan diri dalam proses pengambilan keputusan Bank yang berkaitan dengan benturan kepentingan tersebut.

Guna mengurangi terjadinya benturan kepentingan, setiap anggota Dewan Komisaris diharuskan menandatangani Pakta Integritas yang berisikan komitmen bahwa dalam melaksanakan tugasnya, anggota Dewan Komisaris tidak akan melakukan hal-hal yang dapat menimbulkan konflik kepentingan. Pakta Integritas tersebut disimpan dan diadministrasikan oleh Sekretaris Dewan Komisaris.

## Rangkap Jabatan Dewan Komisaris

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 tentang Penerapan Tata Kelola bagi Bank Umum, serta peraturan turunannya, Dewan Komisaris dapat melakukan rangkap jabatan sepanjang yang bersangkutan tidak mengabaikan pelaksanaan tugas dan tanggung jawab sebagai anggota Dewan Komisaris Bank. Ketentuan terkait rangkap jabatan Dewan Komisaris diuraikan sebagai berikut.

1. Anggota Dewan Komisaris dilarang melakukan rangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris atau Pejabat Eksekutif:
  - a. Pada lembaga keuangan atau perusahaan keuangan, baik bank maupun bukan bank; dan
  - b. Pada lebih dari 1 (satu) lembaga bukan keuangan atau perusahaan bukan keuangan, baik yang berkedudukan di dalam maupun di luar negeri.
2. Tidak termasuk rangkap jabatan sebagaimana di maksud pada poin 1 (satu) di atas dalam hal:
  - a. Anggota Dewan Komisaris menjabat sebagai anggota Direksi, anggota Dewan Komisaris atau Pejabat Eksekutif yang melaksanakan fungsi pengawasan pada 1 (satu) Entitas Anak bukan bank yang dikendalikan oleh Bank;

## Board of Commissioners' Independency and Management of Conflict of Interest

According to the code of ethics of the Board of Commissioners position, in adopting attitude, expressing opinion, and taking action, members of the Board of Commissioners must consider the element of objective, professional, and independency, for the sake of the Bank's balanced interests and must prioritize the stakeholders' interests. Furthermore, with regards to the management of conflict of interest, all members of the Board of Commissioners are prohibited from being involved in certain situation or condition, in which the members of the Board of Commissioners' interests contradict the Bank's interests. However, in case of any conflict of interest, such conflict must be disclosed and the related member of the Board of Commissioners is prohibited from being involved in any of the Bank's decision-making process with related to such conflict of interest.

In order to minimize conflict of interest, each member of the Board of Commissioners must sign an Integrity Pact containing commitment to perform the duties. Members of the Board of Commissioners shall not carry out any actions that may cause any conflict of interest. The Integrity Pact will be kept and administered by the Secretary of the Board of Commissioners.

## Board of Commissioners Position

According to Financial Services Authority Regulation No. 55/POJK.03/2016 on the Implementation of Governance for Commercial Bank and its derivative regulations, the Board of Commissioners may hold a concurrent position to the extent that the relevant party does not neglect the execution of the duties and responsibilities as a member of the Bank's Board of Commissioners. Provisions related to Board of Commissioners' concurrent position are as set out below.

1. Members of Board of Commissioners are prohibited from holding a concurrent position as members of Board of Directors, members of Board of Commissioners, or Executive Officers:
  - a. In financial institutions or financial companies, either banks or non-banks; and
  - b. In more than 1 (one) non-financial institution or non-financial company, both domiciled within and outside the country.
2. Excluding concurrent position referred to in point 1 (one) above in the event that:
  - a. Members of Board of Commissioners serve as member of Board of Directors, members of Board of Commissioners, or Executive Officers performing supervisory functions on 1 (one) Non-bank Subsidiaries controlled by the Bank;

- b. Komisaris Non-Independen menjalankan tugas fungsional dari Pemegang Saham Bank yang berbentuk badan hukum pada kelompok usaha Bank; dan/atau
- c. Anggota Dewan Komisaris menduduki jabatan pada organisasi atau lembaga nirlaba.
- b. Non-Independent Commissioner performs the functional duties of the Bank's Shareholders in the form of a legal entity within the Bank's business group; and/or
- c. Members of Board of Commissioners hold positions in non-profit organizations or institutions.

Berdasarkan ketentuan tersebut, rangkap jabatan Dewan Komisaris dapat dilihat pada tabel di bawah ini.

Based on the above provisions, Board of Commissioners' concurrent positions can be seen in the table below.

Nama Name	Jabatan Position	Rangkap Jabatan pada Perusahaan/Instansi Lain Concurrent Position at Other Company/Institution	
		Jabatan Position	Nama Perusahaan/ Instansi Name of Company/ Institution
Oliver Simorangkir	Komisaris Utama President Commissioner	-	-
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	Komisaris Independen Independent Commissioner	PT Jakarta Setiabudi Internasional Tbk
Zaenal Abidin, PhD	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	Dosen Lecturer	Perbanas Institute
		Asesor Manajemen Risiko Assessor of Risk Management	Pasar Modal Capital Market
		Komisaris Independen Independent Commissioner	PT Sumberdaya Sewatama

## Kepemilikan Saham Dewan Komisaris

Mengacu pada Peraturan Otoritas Jasa Keuangan tentang Penerapan Tata Kelola bagi Bank Umum, Dewan Komisaris harus mengungkapkan kepemilikan saham yang mencapai 5,00% atau lebih, baik pada Bank Victoria maupun pada bank dan perusahaan lain, yang berkedudukan di dalam ataupun di luar negeri. Informasi terkait kepemilikan saham anggota Dewan Komisaris selama tahun 2021 diungkapkan pada tabel berikut.

## Board of Commissioners' Shareholding

Referring to the Financial Services Authority Regulation on the Implementation of Governance for Commercial Banks, the Board of Commissioners' members must disclose their shareholdings reaching 5.00% or more, either in Bank Victoria or in other banks and companies inside or outside of the country, Information related to the Board of Commissioners' shareholding throughout 2021 is disclosed in the table below.

Nama Name	Jabatan Position	Kepemilikan Saham Shareholdings (%)			
		Bank Victoria	Bank Lain Other Banks	Lembaga Keuangan Non-Bank Non-Bank Financial Institution	Perusahaan Lain Other Companies
Oliver Simorangkir	Komisaris Utama President Commissioner	-	-	-	-
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	-	-	-	-
Zaenal Abidin, PhD	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	-	-	-	-



## Rapat Dewan Komisaris

### Kebijakan Rapat Dewan Komisaris

Berdasarkan BOC *Charter*, rapat Dewan Komisaris dilaksanakan secara berkala minimal 4 (empat) kali dalam 1 (satu) tahun. Rapat Dewan Komisaris juga dapat diadakan setiap waktu apabila dianggap perlu oleh salah seorang anggota Dewan Komisaris atau atas permintaan tertulis 1 (satu) Pemegang Saham atau lebih yang (bersama-sama) memiliki sedikitnya 1/10 bagian dari jumlah semua saham dengan hak suara yang sah yang dikeluarkan Bank. Pelaksanaan rapat wajib dihadiri oleh seluruh anggota Dewan Komisaris secara fisik minimal 2 (dua) kali dalam 1 (satu) tahun, dan apabila anggota Dewan Komisaris tidak dapat hadir dalam rapat Dewan Komisaris secara fisik, maka Dewan Komisaris dapat menghadiri rapat melalui teknologi *teleconference*.

Selain rapat internal, Dewan Komisaris wajib mengadakan rapat gabungan dengan Direksi minimal 1 (satu) kali dalam 2 (dua) bulan untuk membahas perkembangan dari laporan kinerja Direksi.

### Frekuensi dan Kehadiran Rapat Dewan Komisaris

Pada tahun 2021, Dewan Komisaris menghadiri rapat internal dan gabungan secara fisik dan virtual. Berikut informasi frekuensi dan tingkat kehadiran Dewan Komisaris dalam rapat internal dan gabungan.

#### Tingkat Kehadiran dan Agenda Rapat Dewan Komisaris Board of Commissioners Meetings' Attendance Rate and Agenda

Tanggal Date	Agenda	Peserta Rapat Meeting Participants		
		Oliver Simorangkir	Gunawan Tenggahardja	Zaenal Abidin, PhD
6 Januari 2021 6 January 2021	1. Rencana rapat Dewan Komisaris tahun 2021; dan 2. Rencana rapat kerja Bank Victoria. 1. Board of Commissioners' meeting plans for 2021; and 2. Bank Victoria's work meeting plans.	✓	✓	✓
7 April 2021	Perubahan anggota Komite Audit dan Komite Pemantau Risiko. Changes in the composition of Audit Committee and Risk Monitoring Committee.	✓	✓	✓
16 Juni 2021 16 June 2021	1. Sistem manajemen anti penyuapan; dan 2. Arahkan terhadap kinerja keuangan Bank. 1. Anti-bribery management system; and 2. Directions on the Bank's financial performance.	✓	✓	✓
29 September 2021	1. Tindak lanjut rencana peningkatan modal inti Entitas Anak (Bank Victoria Syariah); dan 2. Pembaruan tindak lanjut tingkat kesehatan Bank. 1. Follow-up on the plan to increase core capital of Subsidiary (Bank Victoria Syariah); and 2. Follow-up update on the Bank's soundness level.	✓	✓	✓
22 Oktober 2021 22 October 2021	Perubahan anggota Komite Audit dan Komite Pemantau Risiko. Changes in the composition of Audit Committee and Risk Monitoring Committee.	✓	✓	✓

## Board of Commissioners' Meetings

### Board of Commissioners' Meetings Policy

Based on BOC *Charter*, the Board of Commissioners' meetings must be held periodically at a minimum of 4 (four) times in 1 (one) year. Board of Commissioners' meeting must be held at any given time as deemed necessary by any one member of the Board of Commissioners or based upon a written request from 1 (one) or more Shareholders who (jointly) represent at least 1/10 of the total shares with voting rights issued by the Bank. The meeting must be physically attended by all members of the Board of Commissioners at a minimum of twice in 1 (one) year, and if any of the member of the Board of Commissioners cannot physically attend the meeting, then members of Board of Commissioners may attend the meeting using a teleconference technology.

In addition to internal meetings, the Board of Commissioners must hold joint meetings with the Board of Directors, minimum of once every 2 (two) months to discuss the development of the Board of Directors' performance report.

### Board of Commissioners' Meetings Frequency and Attendance

In 2021, the Board of Commissioners attended internal and joint meetings either in person or virtually. The following is information on the Board of Commissioners' internal meetings and joint meetings frequency and attendance rate.



Tanggal Date	Agenda	Peserta Rapat Meeting Participants		
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD
13 Desember 2021 13 December 2021	1. Penetapan agenda rapat gabungan Dewan Komisaris dan Direksi per 15 Desember 2021; dan 2. Rencana kerja Dewan Komisaris tahun 2022. 1. Determination of agenda for joint meetings of the Board of Commissioners and Board of Directors as of 15 December 2021; and 2. Board of Commissioners' work plans for 2022.	✓	✓	✓
<b>Total Kehadiran dalam Rapat</b> Total Meeting Attendance		<b>6</b>	<b>6</b>	<b>6</b>
<b>Total Rapat</b> Total Meetings		<b>6</b>	<b>6</b>	<b>6</b>
<b>Tingkat Kehadiran (%)</b> Attendance Rate (%)		<b>100.00</b>	<b>100.00</b>	<b>100.00</b>
<b>Rata-rata Kehadiran (%)</b> Average Attendance (%)			<b>100.00</b>	

#### Tingkat Kehadiran dan Agenda Rapat Gabungan Dewan Komisaris dan Direksi

Attendance Rate and Agenda of Joint Meetings between Board of Commissioners and Board of Directors

Tanggal Date	Agenda	Peserta Rapat Meeting Participants							
		Dewan Komisaris Board of Commissioners			Direksi Board of Directors				
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Leming	Debora Wahjurtiro Tanoyo	Tamunan
23 Januari 2021 23 January 2021	Kinerja tahun 2020 dan target tahun 2021. Performance in 2020 and targets for 2021.	✓	✓	✓	✓	✓	✓	✓	✓
17 Februari 2021 17 February 2021	1. Kinerja keuangan posisi Januari 2021; 2. Kinerja perkreditan dan dana pihak ketiga posisi Januari 2021 dan strategi perkreditan dan dana pihak ketiga posisi Februari 2021; 3. Realisasi pencapaian target <i>non-performing loan</i> , aset yang diambil alih, <i>write off</i> posisi Januari 2021 serta strategi dan target penyelesaian <i>non-performing loan</i> , aset yang diambil alih, dan <i>write off</i> posisi Februari 2021; dan 4. Lain-lain. 1. Financial performance January 2021 position; 2. Performance of loans and third-party deposits for January 2021 position and strategies of loans and third-party deposits for February 2021 position; 3. Realization of target achievement for non-performing loans, foreclosed assets, write-off for January 2021 position, as well as strategies and targets for settlement of non-performing loans, foreclosed assets, and write-off for February 2021 position; and 4. Others.	✓	✓	✓	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Peserta Rapat Meeting Participants							
		Dewan Komisaris Board of Commissioners			Direksi Board of Directors				
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtirto Tanoyo	Tamunan
12 Maret 2021 12 March 2021	<ol style="list-style-type: none"> <li>Kinerja keuangan posisi Februari 2021;</li> <li>Kinerja perkreditan dan dana pihak ketiga posisi Februari 2021 serta strategi dan target perkreditan dan dana pihak ketiga posisi Maret 2021;</li> <li>Realisasi pencapaian target <i>non-performing loan</i>, aset yang diambil alih, <i>write off</i> posisi Februari 2021 serta strategi dan target penyelesaian <i>non-performing loan</i>, aset yang diambil alih, dan <i>write off</i> posisi Maret 2021;</li> <li>Anti pencucian uang dan pencegahan pendanaan terorisme dan <i>risk register</i>; dan</li> <li>Lain-lain.</li> </ol> <ol style="list-style-type: none"> <li>Financial performance February 2021 position;</li> <li>Performance of loans and third-party deposits for February 2021 position, as well as strategies and targets of loans and third-party deposits for March 2021 position;</li> <li>Realization of target achievement for non-performing loans, foreclosed assets, write-off for February 2021 position, as well as strategies and targets for settlement of non-performing loans, foreclosed assets, and write-off for March 2021 position;</li> <li>Anti-money laundering and prevention of terrorism financing and risk registers; and</li> <li>Others.</li> </ol>	✓	✓	✓	✓	✓	✓	✓	✓
14 April 2021	<ol style="list-style-type: none"> <li>Kinerja keuangan posisi Maret 2021;</li> <li>Kinerja perkreditan dan dana pihak ketiga posisi Maret 2021 serta strategi dan target perkreditan dan dana pihak ketiga posisi April 2021;</li> <li>Realisasi pencapaian target <i>non-performing loan</i>, aset yang diambil alih, <i>write off</i> posisi Maret 2021 serta strategi dan target penyelesaian <i>non-performing loan</i>, aset yang diambil alih, dan <i>write off</i> posisi April 2021; dan</li> <li>Lain-lain.</li> </ol> <ol style="list-style-type: none"> <li>Financial performance March 2021 position;</li> <li>Performance of loans and third-party deposits for March 2021 position, as well as strategies and targets of loans and third-party deposits for April 2021 position;</li> <li>Realization of target achievement for non-performing loans, foreclosed assets, write-off for March 2021 position, as well as strategies and targets for settlement of non-performing loans, foreclosed assets, and write-off for April position; and</li> <li>Others.</li> </ol>	✓	✓	✓	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Peserta Rapat Meeting Participants							
		Dewan Komisaris Board of Commissioners			Direksi Board of Directors				
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Lembing	Debora Wahjutiarto Tanoyo	Tamunan
19 Mei 2021 19 May 2021	<ol style="list-style-type: none"> <li>Kinerja keuangan posisi April 2021;</li> <li>Realisasi pencapaian target <i>non-performing loan</i>, aset yang diambil alih, <i>write off</i> posisi April 2021 serta strategi dan target penyelesaian <i>non-performing loan</i>, aset yang diambil alih, dan <i>write off</i> posisi Mei 2021;</li> <li>Kinerja perkreditan dan dana pihak ketiga posisi April 2021, strategi dan target perkreditan dan dana pihak ketiga posisi Mei 2021, serta kinerja cabang pada April 2021 dan rasio <i>current account saving account</i>;</li> <li>Pembaruan progres <i>change management office</i>; dan</li> <li>Sistem manajemen anti penyuapan.</li> </ol> <ol style="list-style-type: none"> <li>Financial performance April 2021 position;</li> <li>Realization of target achievement for non-performing loans, foreclosed assets, write-off for April 2021 position, as well as strategies and targets for settlement of non-performing loans, foreclosed assets, and write-off for May 2021 position;</li> <li>Performance of loans and third-party deposits for April 2021 position, strategies and targets of loans and third-party deposits for May 2021 position, performance of branch offices for April 2021, and ratio of current account saving account;</li> <li>Updates on progress of change management office; and</li> <li>Anti-bribery management system.</li> </ol>	✓	✓	✓	✓	✓	✓	✓	✓
16 Juni 2021 16 June 2021	<ol style="list-style-type: none"> <li>Kinerja keuangan posisi Mei 2021;</li> <li>Kinerja/realisasi/<i>booking</i> kredit Mei 2021 dan strategi mencapai target di Juni 2021;</li> <li>Kinerja/realisasi target dana pihak ketiga dan rasio <i>current account saving account</i> pada Mei 2021 serta strategi target dana pihak ketiga dan rasio <i>current account saving account</i> pada Juni 2021;</li> <li>Rencana dan target eksposur dana giro dari semua debitur yang aktif di Bank Victoria pada Mei 2021;</li> <li>Kinerja pemimpin cabang dalam <i>booking</i> kredit di Mei 2021; dan</li> <li>Realisasi pencapaian target <i>non-performing loan</i>, aset yang diambil alih, <i>write off</i> posisi Mei 2021 serta strategi dan target penyelesaian <i>non-performing loan</i>, aset yang diambil alih, dan <i>write off</i> posisi Juni 2021.</li> </ol> <ol style="list-style-type: none"> <li>Financial performance May 2021 position;</li> <li>Performance/realization/booking of loans in May 2021 and the strategies to achieve the targets in June 2021;</li> <li>Performance/realization of targets of third-party deposits and current account saving account ratio in May 2021, as well as strategies and targets of third-party deposits and current account saving account ratio in June 2021;</li> </ol>	✓	✓	✓	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Peserta Rapat Meeting Participants							
		Dewan Komisaris Board of Commissioners			Direksi Board of Directors				
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtiro Tanoyo	Tamunan
	<p>4. Plans and targets of demand deposits exposures from all active debtors in Bank Victoria in May 2021;</p> <p>5. Performance of branch managers in loan bookings in May 2021; and</p> <p>6. Realization of target achievement for non-performing loans, foreclosed assets, write-off for May 2021 position, as well as strategies and targets for settlement of non-performing loans, foreclosed assets, and write-off for June 2021 position.</p>								
14 Juli 2021 14 July 2021	<p>1. Kinerja keuangan posisi Juni 2021;</p> <p>2. Kinerja/realisasi pencairan/<i>booking</i> kredit Juni 2021 dan strategi mencapai target pada Juli 2021;</p> <p>3. Kinerja/realisasi target dana pihak ketiga dan rasio <i>current account saving account</i> pada Juni 2021 dan strategi target dana pihak ketiga dan rasio <i>current account saving account</i> Juli 2021;</p> <p>4. Rencana dan target eksposur dana giro dari semua debitur yang aktif di Bank Victoria pada Juni 2021;</p> <p>5. Kinerja pemimpin cabang dalam <i>booking</i> kredit di Juni 2021; dan</p> <p>6. Realisasi pencapaian target <i>non-performing loan</i>, aset yang diambil alih, <i>write off</i> posisi Juni 2021 serta strategi dan target penyelesaian <i>non-performing loan</i>, aset yang diambil alih, dan <i>write off</i> posisi Juli 2021.</p> <p>1. Financial performance June 2021 position;</p> <p>2. Performance/realization/<i>booking</i> of loans in June 2021 and the strategies to achieve the targets in July 2021;</p> <p>3. Performance/realization of targets of third-party deposits and current account saving account ratio in June 2021, as well as strategies and targets of third-party deposits and current account saving account ratio in July 2021;</p> <p>4. Plans and targets of demand deposits exposures from all active debtors in Bank Victoria in June 2021;</p> <p>5. Performance of branch managers in loan bookings in June 2021; and</p> <p>6. Realization of target achievement for non-performing loans, foreclosed assets, write-off for June 2021 position, as well as strategies and targets for settlement of non-performing loans, foreclosed assets, and write-off for July 2021 position.</p>	√	√	√	- (Dinas Luar Kota) (Out-of-Town Duty)	√	√	√	√

Tanggal Date	Agenda	Peserta Rapat Meeting Participants							
		Dewan Komisaris Board of Commissioners			Direksi Board of Directors				
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Lembing	Debora Wahjutiarto Tanoyo	Tamunan
18 Agustus 2021 18 August 2021	<ol style="list-style-type: none"> <li>Kinerja keuangan posisi 31 Juli 2021;</li> <li>Kinerja perkreditan dan dana pihak ketiga selama Juli 2021 dan <i>collection center</i>;</li> <li><i>Strategic paper</i>;</li> <li>Kinerja/realisasi target dana pihak ketiga dan rasio <i>current account saving account</i> Juli 2021 serta strategi target dana pihak ketiga dan rasio <i>current account saving account</i> Agustus 2021;</li> <li>Realisasi pencapaian target <i>non-performing loan</i>, aset yang diambil alih, dan <i>write off</i> posisi Juni 2021; dan</li> <li>Temuan hasil pemeriksaan anti pencucian uang dan pencegahan pendanaan terorisme.</li> </ol> <ol style="list-style-type: none"> <li>Financial performance 31 July 2021 position;</li> <li>Performance of loans and third-party deposits in July 2021 and collection center;</li> <li>Strategic paper;</li> <li>Performance/realization of targets of third-party deposits and current account saving account ratio in July 2021, as well as strategies and targets of third-party deposits and current account saving account ratio in August 2021;</li> <li>Realization of target achievement for non-performing loans, foreclosed assets, and write-off for June 2021 position; and</li> <li>Findings on audit results of anti-money laundering and prevention of terrorism financing.</li> </ol>	✓	✓	✓	✓	✓	✓	✓	✓
15 September 2021	<ol style="list-style-type: none"> <li>Kinerja keuangan posisi 31 Agustus 2021;</li> <li>Kinerja perkreditan Agustus 2021;</li> <li>Realisasi pencapaian target <i>non-performing loan</i>, aset yang diambil alih, dan <i>write off</i> posisi Agustus 2021; dan</li> <li>Pembaruan <i>pra exit meeting</i> Otoritas Jasa Keuangan.</li> </ol> <ol style="list-style-type: none"> <li>Financial performance 31 August 2021 position;</li> <li>Performance of loans in August 2021;</li> <li>Realization of target achievement for non-performing loans, foreclosed assets, and write-off for August 2021 position; and</li> <li>Update of pre-exit meeting of Financial Services Authority.</li> </ol>	✓	✓	✓	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Peserta Rapat Meeting Participants							
		Dewan Komisaris Board of Commissioners			Direksi Board of Directors				
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtirto Tanoyo	Tamunan
22 Oktober 2021 22 October 2021	<ol style="list-style-type: none"> <li>Kinerja keuangan posisi 30 September 2021;</li> <li>Kinerja perkreditan dan dana pihak ketiga selama September 2021 dan <i>collection center</i>;</li> <li>Kinerja/realisasi target dana pihak ketiga dan rasio <i>current account saving account</i> September 2021 serta strategi target dana pihak ketiga dan rasio <i>current account saving account</i> Oktober 2021;</li> <li>Realisasi pencapaian target <i>non-performing loan</i>, aset yang diambil alih, dan <i>write off</i> posisi September 2021; dan</li> <li>Pembaruan aksi korporasi Otoritas Jasa Keuangan.</li> </ol> <ol style="list-style-type: none"> <li>Financial performance 30 September 2021 position;</li> <li>Performance of loans and third-party deposits in September 2021 and collection center;</li> <li>Performance/realization of targets of third-party deposits and current account saving account ratio in September 2021, as well as strategies and targets of third-party deposits and current account saving account ratio in October 2021;</li> <li>Realization of target achievement for non-performing loans, foreclosed assets, and write-off for September 2021 position; and</li> <li>Update on corporate actions of Financial Services Authority.</li> </ol>	✓	✓	✓	✓	✓	✓	✓	✓
17 November 2021	<ol style="list-style-type: none"> <li>Kinerja keuangan Oktober 2021;</li> <li>Kinerja/realisasi pencairan/<i>booking</i> kredit Oktober 2021 dan strategi mencapai target November 2021;</li> <li>Kinerja/realisasi target dana pihak ketiga dan rasio <i>current account saving account</i> Oktober 2021 serta strategi target dana pihak ketiga dan rasio <i>current account saving account</i> November 2021;</li> <li>Rencana dan target eksposur dana giro dari semua debitur yang aktif di Bank Victoria pada Oktober 2021;</li> <li>Kinerja pemimpin cabang dalam <i>booking</i> kredit di Oktober 2021; dan</li> <li>Realisasi pencapaian target <i>non-performing loan</i>, aset yang diambil alih, <i>write off</i> posisi Oktober 2021, strategi dan target penyelesaian <i>non-performing loan</i>, aset yang diambil alih, <i>write off</i> posisi Oktober 2021, serta strategi dan target penyelesaian <i>non-performing loan</i>, aset yang diambil alih, dan <i>write off</i> posisi November 2021.</li> </ol>	✓	✓	✓	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Peserta Rapat Meeting Participants						
		Dewan Komisaris Board of Commissioners			Direksi Board of Directors			
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Lembing	Debora Wahjutiarto Tanoyo
	<ol style="list-style-type: none"> <li>1. Financial performance October 2021;</li> <li>2. Performance/realization of disbursement/ booking of loans in October 2021 and the strategies to achieve the targets in November 2021;</li> <li>3. Performance/realization of targets of third-party deposits and current account saving account ratio in October 2021, as well as strategies and targets of third-party deposits and current account saving account ratio in November 2021;</li> <li>4. Plans and targets of demand deposits exposures from all active debtors in Bank Victoria in October 2021;</li> <li>5. Performance of branch managers in loan bookings in October 2021; and</li> <li>6. Realization of target achievement for non-performing loans, foreclosed assets, write-off for October 2021 position, strategies and targets for settlement of non-performing loans, foreclosed assets, write-off for October 2021 position, as well as strategies and targets for settlement of non-performing loans, foreclosed assets, and write-off for November 2021 position.</li> </ol>							
15 Desember 2021 15 December 2021	<ol style="list-style-type: none"> <li>1. Realisasi kinerja keuangan posisi 30 November 2021 dan posisi 13 Desember 2021 dibandingkan dengan Rencana Bisnis Bank revisi posisi Desember 2021;</li> <li>2. Kinerja/realisasi pencairan/booking kredit posisi 30 November 2021 dan posisi 13 Desember 2021 dibandingkan dengan Rencana Bisnis Bank revisi posisi 31 Desember 2021;</li> <li>3. Kinerja/realisasi target dana pihak ketiga dan rasio <i>current account saving account</i> posisi 30 November 2021 dan posisi 13 Desember 2021 dibandingkan dengan Rencana Bisnis Bank revisi 31 Desember 2021 serta rasio <i>current account saving account</i> komitmen ke Otoritas Jasa Keuangan;</li> <li>4. Realisasi pencapaian target <i>non-performing loan</i> dan aset yang diambil alih posisi 30 November 2021 dan posisi 13 Desember 2021 dibandingkan dengan Rencana Bisnis Bank revisi posisi 31 Desember 2021;</li> <li>5. Progres realisasi aksi korporasi (komitmen kepada Otoritas Jasa Keuangan) posisi 13 Desember 2021 terhadap target 31 Desember 2021 termasuk penyelesaian debitur-debitur bermasalah temuan Otoritas Jasa Keuangan (15 debitur); dan</li> <li>6. Progres realisasi rencana penambahan pemenuhan modal inti minimum Bank untuk akhir tahun 2021.</li> </ol>	√	√	√	√	√	√	√



Tanggal Date	Agenda	Peserta Rapat Meeting Participants							
		Dewan Komisaris Board of Commissioners			Direksi Board of Directors				
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtirto Tanoyo	Tamunan
	<ol style="list-style-type: none"> <li>1. Realization of financial performance for 30 November 2021 position and 13 December 2021 position, as compared to the revised Bank's Business Plan for December 2021 position;</li> <li>2. Performance/realization of disbursement/booking of loans for 30 November 2021 position and 13 December 2021 position, as compared to the revised Bank's Business Plan for 31 December 2021 position;</li> <li>3. Performance/realization of targets for third party deposits and current account saving account ratio for 30 November 2021 position and 13 December 2021 position, as compared to the revised Bank's Business Plan per 31 December 2021 and the current account saving account ratio as commitment to the Financial Services Authority;</li> <li>4. Realization of target achievement for non-performing loans and foreclosed assets for 31 November 2021 position and 13 December 2021 position, as compared to the revised Bank's Business Plan for 31 December 2021 position;</li> <li>5. Progress of realization of corporate actions (commitment to the Financial Services Authority) position of 13 December 2021 against the target of 31 December 2021, including the settlement of non-performing debtors as findings by the Financial Services Authority (15 debtors); and</li> <li>6. Progress of realization of the plan to increase the fulfillment of the Bank's minimum core capital for the end of 2021.</li> </ol>								
<b>Total Kehadiran dalam Rapat</b> Total Meeting Attendance		12	12	12	11	12	12	12	12
<b>Total Rapat</b> Total Meetings		12	12	12	12	12	12	12	12
<b>Tingkat Kehadiran (%)</b> Attendance Rate (%)		100.00	100.00	100.00	91.67	100.00	100.00	100.00	100.00
<b>Rata-rata Kehadiran (%)</b> Average Attendance (%)		100.00			98.33				

**Tingkat Kehadiran dan Agenda Rapat Gabungan Dewan Komisaris dengan Direktorat dan/atau Divisi**  
**Attendance Rate and Agenda of Joint Meetings between Board of Commissioners and Directorates and/or Divisions**

Tanggal Date	Agenda	Peserta Rapat Meeting Participants		
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD
24 Maret 2021 24 March 2021	Membahas isu-isu operasional antara Dewan Komisaris dengan Direktorat yang terdiri dari Divisi: 1. Operasional; 2. <i>Finance &amp; Accounting</i> ; 3. <i>Loan Admin &amp; Legal</i> ; dan 4. <i>Human Capital Management &amp; General Affair</i> .  Discussing operational issues between the Board of Commissioners and Directorates consisting of Divisions of: 1. Operations; 2. Finance & Accounting; 3. Loan Admin & Legal; and 4. Human Capital Management & General Affairs.	✓	✓	✓
31 Maret 2021 31 March 2021	Membahas <i>non-performing loan</i> dan proyeksi antara Dewan Komisaris dengan Direktorat <i>Special Asset Management</i> .	✓	✓	✓
16 Juni 2021 16 June 2021	Discussing non-performing loans and projections between the Board of Commissioners and Directorate Special Asset Management.	✓	✓	✓
16 Juli 2021 16 July 2021	Membahas isu-isu operasional antara Dewan Komisaris dengan Direktorat yang terdiri dari Divisi: 1. Operasional; 2. <i>Finance &amp; Accounting</i> ; 3. <i>Loan Admin &amp; Legal</i> ; dan 4. <i>Human Capital Management &amp; General Affair</i> .	✓	✓	✓
22 September 2021	Discussing operational issues between the Board of Commissioners and Directorates consisting of Divisions of: 1. Operations; 2. Finance & Accounting; 3. Loan Admin & Legal; and 4. Human Capital Management & General Affairs.	✓	✓	✓
29 September 2021	Membahas <i>non-performing loan</i> dan proyeksi antara Dewan Komisaris dengan Direktorat <i>Special Asset Management</i> .  Discussing non-performing loans and projections between the Board of Commissioners and Directorate of Special Asset Management.	✓	✓	✓
8 Desember 2021 8 December 2021	Membahas isu-isu operasional antara Dewan Komisaris dengan Direktorat yang terdiri dari Divisi: 1. Operasional; 2. <i>Finance &amp; Accounting</i> ; 3. <i>Loan Admin &amp; Legal</i> ; dan 4. <i>Human Capital Management &amp; General Affair</i> .  Discussing operational issues between the Board of Commissioners and Directorates consisting of Divisions of: 1. Operations; 2. Finance & Accounting; 3. Loan Admin & Legal; and 4. Human Capital Management & General Affairs.	✓	✓	✓
17 Desember 2021 17 December 2021	Membahas <i>non-performing loan</i> dan proyeksi antara Dewan Komisaris dengan Direktorat <i>Special Asset Management</i> .  Discussing non-performing loans and projections between the Board of Commissioners and Directorate of Special Asset Management.	✓	✓	✓
<b>Total Kehadiran dalam Rapat</b> <b>Total Meeting Attendance</b>		<b>8</b>	<b>8</b>	<b>8</b>
<b>Total Rapat</b> <b>Total Meetings</b>		<b>8</b>	<b>8</b>	<b>8</b>
<b>Tingkat Kehadiran (%)</b> <b>Attendance Rate (%)</b>		<b>100.00</b>	<b>100.00</b>	<b>100.00</b>
<b>Rata-rata Kehadiran (%)</b> <b>Average Attendance (%)</b>			<b>100.00</b>	

## Persetujuan dan Rekomendasi Dewan Komisaris

Di sepanjang tahun 2021, Dewan Komisaris telah mengeluarkan berbagai persetujuan maupun rekomendasi sebagai upaya perbaikan kinerja Bank. Berikut informasi persetujuan dan rekomendasi Dewan Komisaris.

## Board of Commissioners' Approvals and Recommendations

Throughout 2021, the Board of Commissioners gave various approvals and recommendations as efforts to enhance Bank's performance. The following is information of approvals and recommendations made by the Board of Commissioners.

No. Surat Letter No.	Tanggal Date	Keputusan Decisions
001/KOM-DIR/01/21	6 Januari 2021 6 January 2021	Arahan Hasil Pemeriksaan SKAI untuk Kantor Cabang Fatmawati Bidang Kredit posisi September 2020 Directions of SKAI Audit Results for Fatmawati Branch Office, Credit Sector, September 2020 position
002/KOM-DIR/01/21	6 Januari 2021 6 January 2021	Arahan Hasil Pemeriksaan SKAI untuk Divisi IT posisi September 2020 Directions of SKAI Audit Results on IT Division, September 2020 position
001/SK-KOM/02/21	1 Februari 2021 1 February 2021	Prosedur Persetujuan dan Wewenang Komite Kredit Procedure for Approval and Authority of Credit Committee
001/KOM-DIR/03/21	4 Maret 2021 4 March 2021	Penyusunan <i>Risk Register</i> dan Pelaporan Profil Risiko Preparation of Risk Register and Risk Profile Reporting
001/KOM-DIR/04/21	16 April 2021	Arahan Hasil Pemeriksaan SKAI atas Penelaahan Hasil Pemeriksaan untuk Divisi <i>Treasury</i> , Divisi <i>International Banking</i> , dan Unit Kerja <i>Settlement</i> posisi Januari 2021 Directions of SKAI Audit Results on the Review of Audit Results on Treasury Division, International Banking Division; and Settlement Work Unit, January 2021 position
002/KOM-DIR/04/21	16 April 2021	Evaluasi Pemeriksaan Laporan Hasil Pemeriksaan SKAI atas Kantor Cabang Utama/Area Kelapa Gading Bidang Operasional dan Perkreditan posisi Januari 2021 Evaluation of SKAI Audit Results on Main Branch Office/ Kelapa Gading Area, Operations and Credit Sector, January 2021 position
003/KOM-DIR/04/21	21 April 2021	Arahan Hasil Pemeriksaan SKAI untuk Pelaksanaan Audit Internal <i>Integrated</i> Grup Victoria Semester II 2020 PT Bank Victoria International Tbk Directions of SKAI Audit Results on Implementation of Victoria Group's Integrated Internal Audit Semester II 2020 of PT Bank Victoria International Tbk
001/KOM-DIR/05/21	19 Mei 2021 19 May 2021	Arahan Hasil Penelaahan Tren Pertumbuhan Kinerja Usaha Triwulan I 2021 dan Pencapaian Target Rencana Bisnis Bank Triwulan I 2021 PT Bank Victoria International Tbk Directions of Review Results on Business Performance Growth Trends Quarter I 2021 and Achievement of Bank Business Plan Targets Quarter I 2021 of PT Bank Victoria International Tbk
002/KOM-DIR/05/21	28 Mei 2021 28 May 2021	Arahan Hasil Pemeriksaan SKAI untuk Kantor Cabang Cideng Bidang Perkreditan posisi Desember 2020 Directions of SKAI Audit Results for Cideng Branch Office, Credit Sector, December 2020 position
001/KOM-DIR/06/21	2 Juni 2021 2 June 2021	Arahan Hasil Pemeriksaan SKAI untuk Area BIP Bidang Perkreditan posisi Desember 2020 Directions of SKAI Audit Results for BIP Area, Credit Sector, December 2020 position
002/KOM-DIR/06/21	17 Juni 2021 17 June 2021	Arahan Dewan Komisaris Sehubungan dengan Kinerja Keuangan posisi Mei 2021 Directions of Board of Commissioners in connection with Financial Performance, May 2021 position
003/KOM-DIR/06/21	25 Juni 2021 25 June 2021	Arahan Hasil Pemeriksaan SKAI untuk Kantor Cabang Utama Semarang Bidang Operasional dan Perkreditan posisi Maret 2021 Directions of SKAI Audit Results for Semarang Main Branch Office, Operations and Credit Sectors, March 2021 position
004/KOM-DIR/06/21	25 Juni 2021 25 June 2021	Arahan Hasil Pemeriksaan SKAI untuk Kantor Cabang Utama Bogor Bidang Operasional dan Perkreditan posisi Maret 2021 Directions of SKAI Audit Results for Bogor Main Branch Office, Operations and Credit Sectors, March 2021 position
005/KOM-DIR/06/21	25 Juni 2021 25 June 2021	Evaluasi Pemeriksaan SKAI atas Kantor Cabang Utama Senayan Posisi Desember 2020 Evaluation of SKAI Audit for Senayan Main Branch Office, December 2020 position
006/KOM-DIR/06/21	30 Juni 2021 30 June 2021	Evaluasi Pemeriksaan SKAI atas Kepatuhan Terhadap Implementasi Kebijakan Pemulihan Ekonomi Nasional (PEN) Evaluation of SKAI Audit on Compliance with the Implementation of National Economic Recovery (PEN) Policy
001/KOM-DIR/07/21	23 Juli 2021 23 July 2021	Arahan Hasil Penelaahan Tren Pertumbuhan Kinerja Usaha Triwulan II 2021 dan Pencapaian Target Rencana Bisnis Bank Triwulan II 2021 PT Bank Victoria International Tbk Directions of Review Results on Business Performance Growth Trends Quarter II 2021 and Achievement of Bank Business Plan Targets Quarter II 2021 of PT Bank Victoria International Tbk

No. Surat Letter No.	Tanggal Date	Keputusan Decisions
002/KOM-DIR/07/21	23 Juli 2021 23 July 2021	Hasil Penelaahan Laporan Pengendalian Internal Kantor Akuntan Publik Tanudiredjo, Wibisono, Rintis & Rekan 31 Desember 2019 dan 31 Desember 2020 Review Results of Internal Control Report of Public Accounting Firm Tanudiredjo, Wibisono, Rintis & Rekan per 31 December 2019 and 31 December 2020
003/KOM-DIR/07/21	23 Juli 2021 23 July 2021	Penunjukkan Kantor Akuntan Publik dan/atau Akuntan Publik, untuk Jasa Asuransi atas Laporan Keuangan PT Bank Victoria International Tbk Tahun Buku 31 Desember 2021 Appointment of Public Accounting Firm and/or Public Accountant for Assurance Work on the Financial Statements of PT Bank Victoria International Tbk for the Fiscal Year ended 31 December 2021
001/KOM-DIR/08/21	10 Agustus 2021 10 August 2021	Evaluasi Hasil Pemeriksaan SKAI Kantor Cabang Utama Makassar Bidang Operasional dan Kredit Periode Mei 2021 Evaluation of SKAI Audit Results for Makassar Main Branch Office, Operations and Credit Sectors, May 2021 period
002/KOM-DIR/08/21	10 Agustus 2021 10 August 2021	Evaluasi Hasil Pemeriksaan SKAI Kantor Cabang Utama Solo Bidang Operasional dan Kredit Periode Mei 2021 Evaluation of SKAI Audit Results for Solo Main Branch Office, Operations and Credit Sectors, May 2021 period
003/KOM-DIR/08/21	13 Agustus 2021 13 August 2021	Arahan Hasil Pemeriksaan SKAI untuk Pelaksanaan Audit Internal <i>Integrated Grup</i> Victoria Triwulan II 2021 PT Bank Victoria International Tbk Directions of SKAI Audit Results on Implementation of Victoria Group's Integrated Internal Audit Quarter II 2021 of PT Bank Victoria International Tbk
004/KOM-DIR/08/21	18 Agustus 2021 18 August 2021	Arahan Laporan Profil Risiko Triwulan II dan Laporan Kepatuhan Triwulan II Tahun 2021 Directions of Risk Profile Report Quarter II and Compliance Report Quarter II 2021
001/KOM-DIR/10/21	13 Oktober 2021 13 October 2021	Evaluasi Hasil Pemeriksaan SKAI <i>Review Hasil Pemeriksaan Audit Divisi Accounting Finance and Tax</i> Periode Juni 2021 Evaluation of SKAI Audit Results, Review of Audit Results, Accounting, Finance, and Tax Division, June 2021 period
002/KOM-DIR/10/21	13 Oktober 2021 13 October 2021	Evaluasi Hasil Pemeriksaan SKAI Kantor Cabang Utama Medan Bidang Operasional dan Kredit Periode Juli 2021 Evaluation of SKAI Audit Results for Medan Main Branch Office, Operations and Credit Sectors, July 2021 period
003/KOM-DIR/10/21	13 Oktober 2021 13 October 2021	Evaluasi Hasil Pemeriksaan SKAI Kantor Cabang Utama Bandung Bidang Operasional dan Kredit Periode Juli 2021 Evaluation of SKAI Audit Results for Bandung Main Branch Office, Operations and Credit Sectors, July 2021 period
004/KOM-DIR/10/21	13 Oktober 2021 13 October 2021	Arahan Hasil Penelaahan Tren Pertumbuhan Kinerja Usaha September 2021 dan Pencapaian Target Rencana Bisnis Bank Triwulan III 2021 PT Bank Victoria International Tbk Directions of Review Results on Business Performance Growth Trends September 2021 and Achievement of Bank Business Plan Targets Quarter III 2021 of PT Bank Victoria International Tbk
001/KOM-DIR/11/21	17 November 2021	Arahan Hasil Pemeriksaan SKAI untuk Pelaksanaan Audit Internal <i>Integrated Grup</i> Victoria Triwulan III 2021 PT Bank Victoria International Tbk Directions of SKAI Audit Results on implementation of Victoria Group's Integrated Internal Audit Quarter III 2021 of PT Bank Victoria International Tbk
001/KOM-DIR/12/21	17 Desember 2021 17 December 2021	Arahan Hasil Pemeriksaan SKAI untuk Divisi Kredit Komersial dan Divisi Kredit Korporasi posisi Oktober 2021 Directions of SKAI Audit Results for Commercial Credit Division and Corporate Credit Division, October 2021 position
001/SK-KOM/11/21	10 November 2021	Ketentuan Pengajuan Biaya <i>Entertainment</i> dan Sejenisnya untuk Kepentingan Perusahaan Provisions for Submission of Entertainment Fees and those of similar for Corporate Interests

## Sertifikasi Manajemen Risiko Dewan Komisaris

Berdasarkan Peraturan Bank Indonesia No. 11/19/PBI/2009 tentang Sertifikasi Manajemen Risiko bagi Pengurus dan Pejabat Bank Umum, Dewan Komisaris Bank mengikuti sertifikasi manajemen risiko dan *refreshment* guna mendukung terciptanya Bank yang sehat. Informasi terkait sertifikasi manajemen risiko Dewan Komisaris diungkapkan pada tabel berikut.

## Board of Commissioners' Risk Management Certifications

Based of Bank Indonesia Regulation No. 11/19/PBI/2009 on Risk Management Certification for Managers and Officers of Commercial Banks, the Bank's Board of Commissioners participates in risk management certification and refreshments in order to support the establishment of a sound Bank. Information regarding Board of Commissioners' risk management certification is disclosed in the table below.

Nama Name	Jabatan Position	Level	Waktu Time	Masa Berlaku Validity Period	Penyelenggara Organizer
Oliver Simorangkir	Komisaris Utama President Commissioner	5	30 September 2021	5 September 2023	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	5	30 September 2021	5 September 2025	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Zaenal Abidin, PhD	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	2	30 September 2021	5 September 2025	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution

## Penilaian Kinerja Dewan Komisaris

### Prosedur, Pelaksanaan, dan Kriteria Penilaian Kinerja Dewan Komisaris

Penilaian kinerja anggota Dewan Komisaris dilakukan oleh Komite Nominasi dan Remunerasi, antara lain dengan sistem penilaian sendiri, *peer evaluation*, atau dengan sistem lain untuk kemudian diputuskan dalam rapat Dewan Komisaris. Sementara itu, hasil penilaian kinerja Dewan Komisaris disampaikan melalui Komite Nominasi dan Remunerasi kepada Pemegang Saham sebelum pelaksanaan RUPS Tahunan.

#### 1. Penilaian Sendiri Dewan Komisaris

Pelaksanaan penilaian sendiri Dewan Komisaris dikoordinir oleh Divisi *Compliance/Integrated, AML & System Procedure* dan dilaporkan kepada Dewan Komisaris melalui Komite Nominasi dan Remunerasi. Pelaksanaan penilaian sendiri Dewan Komisaris mengacu pada Peraturan Otoritas Jasa Keuangan tentang Penerapan Tata Kelola bagi Bank Umum. Berdasarkan peraturan tersebut, Bank wajib melaksanakan penilaian sendiri implementasi GCG dengan salah satu faktor penilaian adalah pelaksanaan tugas dan tanggung jawab Dewan Komisaris. Faktor penilaian terkait Dewan Komisaris tersebut mencakup 16 indikator *governance structure*, 17 indikator *governance process*, dan 6 (enam) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 13 /SEOJK.03/2017 tentang Penerapan Tata Kelola Bagi Bank Umum.

**Pada tahun 2021, hasil penilaian sendiri Dewan Komisaris memperoleh nilai komposit "2 (dua)" dengan kategori "Baik".**  
**In 2021, the Board of Commissioners' self assessment result obtained a composite score of "2 (two)" under the category of "Good".**

Keterangan lebih lanjut mengenai hasil penilaian sendiri Dewan Komisaris dijelaskan pada bagian Penilaian GCG.

## Board of Commissioners' Performance Assessment

### Procedure, Implementation, and Criteria of Board of Commissioners' Performance Assessment

Board of Commissioners' performance is assessed by the Nomination and Remuneration Committee, among others using self-assessment system, peer evaluation system, or using other system and thereafter decided in a Board of Commissioners' meeting. Meanwhile, the result of such Board of Commissioners' performance assessment will be submitted by the Nomination and Remuneration Committee to the Shareholders prior to the Annual GMS.

#### 1. Board of Commissioners' Self-Assessment

The implementation of Board of Commissioners' self-assessment is coordinated by the Compliance/Integrated, AML & System Procedure Division and reported to the Board of Commissioners by the Nomination and Remuneration Committee. Implementation of the Board of Commissioners' self-assessment refers to the Financial Services Authority Regulation on Implementation of Governance for Commercial Banks. Pursuant to the above regulations, it is mandatory for the Bank to conduct self-assessment on GCG implementation with the implementation of Board of Commissioners' duties and responsibilities being one of the factors being assessed. The Board of Commissioners' assessment factors include 16 indicators of governance structure, 17 indicators of governance process, and 6 (six) indicators of governance outcome as regulated in Appendix III to Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks.

Further information regarding the Board of Commissioners self-assessment results is explained in the GCG Assessment section.

## 2. Peer Evaluation Dewan Komisaris

Pelaksanaan penilaian *peer evaluation* dilakukan oleh setiap anggota Dewan Komisaris terhadap anggota Dewan Komisaris lainnya. Pelaksanaan penilaian dilakukan berdasarkan bidang pengawasan dan pekerjaan masing-masing Dewan Komisaris. Kriteria penilaian dibuat secara general dan diuraikan dengan penjelasan secara kualitatif (penilaian tidak dalam angka/skala).

Penilaian kinerja dapat dilakukan berdasarkan kriteria umum, antara lain:

- a. Kehadiran dalam rapat internal Dewan Komisaris;
- b. Kehadiran dalam rapat Dewan Komisaris dengan Direksi;
- c. Kehadiran dalam rapat Dewan Komisaris dengan Pemegang Saham; dan
- d. Kehadiran dalam rapat Dewan Komisaris atau Komite dengan Unit Kerja Bank.

Kinerja Dewan Komisaris juga dapat dinilai menurut faktor lainnya, baik secara individual maupun kolektif, dengan kriteria berikut, namun tidak terbatas kepada:

- a. Integritas (misalnya benturan kepentingan yang muncul);
- b. Pengetahuan dan pemahaman Dewan Komisaris atas nilai-nilai misi, rencana jangka panjang Bank, dan refleksi pemahaman ini kepada isu-isu penting sepanjang tahun;
- c. Partisipasi Dewan Komisaris dalam rapat-rapat, termasuk kemampuan untuk menyampaikan, memberikan argumentasi dan memberikan solusi mengenai isu-isu strategis Bank;
- d. Kemampuan Dewan Komisaris dalam mengikuti isu-isu dan tren yang berpengaruh terhadap Bank dan menggunakan informasi tersebut untuk menilai dan mengarahkan kinerja Bank, bukan hanya dari tahun ke tahun, akan tetapi juga dalam jangka panjang; dan
- e. Hubungan anggota Dewan Komisaris dengan sesama anggota Dewan Komisaris lainnya, dengan Direksi, dan pihak-pihak lain yang diatur dalam Anggaran Dasar dan peraturan perundang-undangan.

## 2. Board of Commissioners' Peer Evaluation

Peer evaluation is conducted reciprocally by each member of the Board of Commissioners to other peer members of the Board of Commissioners. The evaluation is carried out based on the supervision and work sector of the respective members of the Board of Commissioners. Evaluation criteria is set in general and explained in a qualitative description (the evaluation result is not represented by a score/scale).

Performance assessment can be conducted based on general criteria, among others:

- a. Attendance in Board of Commissioners' internal meetings;
- b. Attendance in joint meetings between Board of Commissioners and Board of Directors;
- c. Attendance in meetings between Board of Commissioners and Shareholders; and
- d. Attendance in meetings between Board of Commissioners or Committees and the Bank's Work Units.

Performance of Board of Commissioners can also be assessed according to other factors, either individually or collectively, under the following criteria, but not limited to:

- a. Integrity (for example, arising conflict of interest);
- b. Knowledge and understanding of the Board of Commissioners on the Bank's values, mission, Long-Term Plan, and reflections of understanding on important issues throughout the year;
- c. Participation of Board of Commissioners in meetings including the ability to convey, present arguments, and provide solutions on the Bank's strategic issues;
- d. The ability of the Board of Commissioners in following issues and trends affecting the Bank, and using that information to assess and direct the Bank's performance, not only from year to year, but also in the long term; and
- e. Relationship among members of the Board of Commissioners, with the Board of Directors, and other parties stipulated in the Articles of Association and laws and regulations.

**Pada tahun 2021, hasil penilaian *peer evaluation* pelaksanaan tugas Dewan Komisaris memperoleh nilai komposit "2 (dua)" dengan kategori "Baik". Artinya, masing-masing anggota Dewan Komisaris telah melaksanakan tugas dan tanggung jawab sesuai bidang pengawasan dengan baik, sesuai dengan BOC Charter dan peraturan perundang-undangan yang berlaku.**

In 2021, the peer evaluation of implementation of Board of Commissioners' duties obtained a composite score of "2 (two)" under the category of "Good". It means, each member of the Board of Commissioners has properly performed the duties and responsibilities according to the supervision sector, pursuant to the BOC Charter and prevailing laws and regulations.

Hasil penilaian kinerja tahun 2021 menunjukkan bahwa Dewan Komisaris telah menjalankan tugas dan tanggung jawabnya dengan baik sesuai dengan prosedur dan kriteria penilaian. Hasil penilaian kinerja tersebut dijadikan dasar dalam pemberian remunerasi jangka pendek maupun jangka panjang.

The 2021 performance assessment results show that the Board of Commissioners has performed the duties and responsibilities properly according to the assessment procedure and criteria. Such performance assessment result was then made as a basis in considering short-term and long-term remuneration for the Board of Commissioners.



## Penilaian Kinerja Komite Pendukung Dewan Komisaris

Penilaian kinerja Komite-Komite di bawah Dewan Komisaris dievaluasi secara individual maupun secara kolektif setiap 1 (satu) tahun dengan menggunakan metode evaluasi dalam suatu sistem yang ditetapkan dalam keputusan Dewan Komisaris.

### Prosedur, Pelaksanaan, dan Kriteria Penilaian Kinerja Komite Pendukung Dewan Komisaris

#### 1. Penilaian Sendiri Komite Pendukung Dewan Komisaris

Pelaksanaan penilaian sendiri Komite di bawah Dewan Komisaris dikoordinir oleh Divisi *Compliance/Integrated, AML & System Procedure* serta dilakukan berdasarkan Peraturan Otoritas Jasa Keuangan tentang Penerapan Tata Kelola bagi Bank Umum. Indikator penilaian sendiri Komite di bawah Dewan Komisaris dalam implementasi GCG mencakup 10 (sepuluh) indikator *governance structure*, 7 (tujuh) indikator *governance process*, dan 2 (dua) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola Bagi Bank Umum. Hasil penilaian tersebut dilaporkan oleh Divisi *Compliance/Integrated, AML & System Procedure* ke Dewan Komisaris.

#### 2. Penilaian Kinerja oleh Dewan Komisaris

Penilaian kinerja komite di bawah Dewan Komisaris oleh Dewan Komisaris dilaksanakan berdasarkan bidang pengawasan masing-masing Komite. Kriteria penilaian dibuat secara umum dan diuraikan dengan penjelasan secara kualitatif (penilaian tidak dalam angka/skala).

### Hasil Penilaian Kinerja Komite Pendukung Dewan Komisaris

#### 1. Penilaian Sendiri Komite Pendukung Dewan Komisaris

Pada tahun 2021, hasil penilaian sendiri pelaksanaan tugas dan tanggung jawab Komite di bawah Dewan Komisaris berada pada kategori "Cukup Baik".

#### 2. Penilaian Kinerja oleh Dewan Komisaris

Pada tahun 2021, hasil penilaian kinerja Komite pendukung Dewan Komisaris yang dilakukan oleh Dewan Komisaris beserta dasar penilaiannya diuraikan sebagai berikut.

## Performance Assessment of the Board of Commissioners' Supporting Committees

Performance of the committees under the Board of Commissioners is evaluated both individually and collectively once every year by using evaluation method in a system established under the decision of the Board of Commissioners.

### Procedure, Implementation, and Criteria of Performance Assessment of the Board of Commissioners' Supporting Committees

#### 1. Self-Assessment by the Board of Commissioners' Supporting Committees

The implementation of self-assessment of committees under the supervision of the Board of Commissioners is coordinated by the Compliance/Integrated, AML & System Procedure Division and is performed based on Financial Services Authority Regulation on the Implementation of Governance for Commercial Banks. The indicators for self-assessment of the Committees under Board of Commissioners includes 10 (ten) indicators of governance structure, 7 (seven) indicators of governance process, and 2 (two) indicators of governance outcome as regulated under Appendix III to Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks. The assessment result is reported by the Compliance/Integrated, AML & System Procedure Division to the Board of Commissioners.

#### 2. Performance Assessment by the Board of Commissioners

Performance assessment by the Board of Commissioners for the Committees under its supervision is carried out based on each Committee's monitoring sector. The assessment criteria are made in general with qualitative description (assessment result is not represented by score/scale).

### Performance Assessment Results of the Board of Commissioners' Supporting Committee

#### 1. Self-Assessment by the Board of Commissioners' Supporting Committees

In 2021, the self-assessment on duties and responsibilities of Committees under the Board of Commissioners was in "Fair" category.

#### 2. Performance Assessment by the Board of Commissioners

In 2021, the performance assessment results of the Board of Commissioners' supporting Committees conducted by the Board of Commissioners including the basis of the assessment are set out below.



<b>Komite Pendukung Dewan Komisaris</b> <b>Board of Commissioners Supporting Committee</b>	<b>Dasar Penilaian</b> <b>Basis of Assessment</b>	<b>Hasil Penilaian</b> <b>Assessment Results</b>
Komite Audit Audit Committee	<ol style="list-style-type: none"> <li>1. Kehadiran dalam rapat Komite;</li> <li>2. Penguasaan materi yang akan dibahas;</li> <li>3. Kesiapan menyediakan waktu dan upaya dalam memenuhi tugas dan tanggung jawab sebagai anggota Komite;</li> <li>4. Kesiapan berpartisipasi dalam kegiatan di luar kantor, seperti kunjungan ke unit bisnis;</li> <li>5. Kualitas dan saran yang diberikan dalam rapat-rapat;</li> <li>6. Terlaksananya pemantauan dan evaluasi, baik secara berkala maupun tahunan, atas hal-hal yang menjadi bidang tugas dan tanggung jawab masing-masing Komite;</li> <li>7. Pemantauan dan koreksi penyimpangan; serta</li> <li>8. Terlaksananya pemantauan dan evaluasi terhadap divisi/unit yang terkait dengan bidang tugas dan tanggung jawab masing-masing Komite.</li> </ol>	<p>Komite Audit telah melaksanakan tugas dan tanggung jawabnya dalam mengawasi hal-hal yang terkait dengan informasi keuangan, sistem pengendalian internal (<i>Internal Control System</i>), serta efektivitas pemeriksaan oleh auditor internal dan eksternal. Dewan Komisaris menilai kinerja Komite Audit pada tahun 2021 ini telah efektif dan sesuai dengan Piagam Komite Audit.</p> <p>The Audit Committee performed its duties and responsibilities in supervising matters related to financial information, internal control system, and auditing effectiveness performed by internal and external auditors. The Board of Commissioners considers that the Audit Committee's performance in 2021 was already effective and in accordance with the Audit Committee Charter.</p>
Komite Pemantau Risiko Risk Monitoring Committee	<ol style="list-style-type: none"> <li>1. Attendance in Committee's meetings;</li> <li>2. Mastering materials to be discussed;</li> <li>3. Willingness to allocate time and efforts in fulfilling duties and responsibilities as member of the Committees;</li> <li>4. Willingness to participate in out of-office activities, such as visit to business unit;</li> <li>5. Quality advice given in the meetings;</li> <li>6. Implementation of monitoring and evaluation, whether periodically or annually, of matters that become the duties and responsibilities of each Committee;</li> <li>7. Monitoring and correction of deviations; and</li> <li>8. Implementation of monitoring and evaluation to the division/unit related to the duties and responsibilities of each Committee.</li> </ol>	<p>Sepanjang tahun 2021, Dewan Komisaris menilai Komite Pemantau Risiko telah menjalankan tugas dan tanggung jawabnya dengan baik. Dengan dasar penilaian bahwa Komite Pemantau Risiko telah melaksanakan rapat sebanyak 4 (empat) kali dan menjalankan tugasnya seperti:</p> <ol style="list-style-type: none"> <li>1. Melakukan laporan kepatuhan semester II 2020 Bank Victoria dan memberikan rekomendasi; serta</li> <li>2. Membahas dan memberikan rekomendasi atas profil risiko 2021; kebijakan baru Bank Indonesia dan Otoritas Jasa Keuangan; Anti Pencucian Uang (APU) dan Pencegahan Pendanaan Terorisme (PPT); serta laporan perkembangan proyek <i>risk registered</i> dan pelaksanaan proyek <i>risk registered</i> agar dipercepat.</li> </ol> <p>Throughout 2021, the Board of Commissioners evaluated that the Risk Monitoring Committee performed its duties and responsibilities properly. On the basis of its assessment that the Risk Monitoring Committee has conducted meetings 4 (four) times and performed its duties such as:</p> <ol style="list-style-type: none"> <li>1. Preparing compliance report for semester II 2020 of Bank Victoria and providing recommendations; and</li> <li>2. Discussing and providing recommendations for the 2021 risk profile; new policies of Bank Indonesia and Financial Services Authority; Anti-Money Laundering (APU) and Prevention of Terrorism Funding (PPT); and progress report of risk registered projects and the implementation of risk registered projects is to be accelerated.</li> </ol>
Komite Nominasi dan Remunerasi Nomination and Remuneration Committee		<p>Sepanjang tahun 2021, Dewan Komisaris menilai Komite Nominasi dan Remunerasi telah menjalankan tugas dan tanggung jawabnya dengan baik. Dengan dasar penilaian bahwa Komite Nominasi dan Remunerasi telah melaksanakan rapat sebanyak 6 (enam) kali dan menjalankan tugasnya antara lain:</p> <ol style="list-style-type: none"> <li>1. Menyusun dan memberikan rekomendasi mengenai sistem serta prosedur pemilihan dan/atau penggantian anggota Dewan Komisaris dan Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS;</li> <li>2. Memberikan rekomendasi mengenai calon anggota Dewan Komisaris dan/atau Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS;</li> <li>3. Menyusun dan mengevaluasi remunerasi kepada anggota Dewan Komisaris, Direksi, dan Pejabat Eksekutif sampai dengan 1 (satu) tingkat di bawah Direksi;</li> <li>4. Memberikan rekomendasi kepada Dewan Komisaris mengenai kebijakan remunerasi bagi Dewan Komisaris dan Direksi serta Pejabat Eksekutif;</li> <li>5. Membantu Dewan Komisaris untuk memberikan rekomendasi tentang jumlah anggota Dewan Komisaris dan Direksi; serta</li> <li>6. Membantu Direksi dalam melakukan pengkajian ulang terhadap sistem <i>Human Capital Management</i> dan kebijakan pengembangan sumber daya manusia mulai dari rekrutmen, penilaian, peningkatan kompetensi, evaluasi, promosi, demosi, terminasi, suksesi, seleksi, dan lain-lain.</li> </ol>

<b>Komite Pendukung Dewan Komisaris</b> Board of Commissioners Supporting Committee	<b>Dasar Penilaian</b> Basis of Assessment	<b>Hasil Penilaian</b> Assessment Results
		Throughout 2021, the Board of Commissioners evaluated that the Remuneration and Nomination Committee performed its duties and responsibilities properly. On the basis of its assessment that the Remuneration and Nomination Committee has held 6 (six) meetings and performed its duties such as: <ol style="list-style-type: none"> <li>1. Preparing and providing recommendation on system and procedure of selection and/or replacement of members of Board of Commissioners and Board of Directors to the Board of Commissioners to be delivered to the GMS;</li> <li>2. Providing recommendation on candidate for the Board of Commissioners and/or Board of Directors to the Board of Commissioners to be delivered to the GMS;</li> <li>3. Preparing and evaluating the remuneration for members of Board of Commissioners, Board of Directors, and Executive Officers up to 1 (one) level below the Board of Directors;</li> <li>4. Providing recommendation to the Board of Commissioners on the remuneration policy for the Board of Commissioners, Board of Directors, and Executive Officers;</li> <li>5. Assisting the Board of Commissioners in giving recommendation on the number of members of Board of Commissioners and Board of Directors; and</li> <li>6. Assisting the Board of Directors in reviewing the Human Capital Management system and human capital development policy starting from recruitment, assessment, competence development, evaluation, promotion, demotion, termination, succession, selection, and others.</li> </ol>

## Pengunduran Diri dan Pemberhentian Dewan Komisaris

Berdasarkan BOC *Charter*, seorang anggota Dewan Komisaris berhak mengundurkan diri dari jabatannya dengan memberitahukan secara tertulis mengenai maksud tersebut kepada Bank paling lambat 30 hari sebelum tanggal pengunduran dirinya. Anggota Dewan Komisaris yang mengundurkan diri tersebut tetap dapat dimintakan pertanggungjawabannya sejak pengangkatan sampai dengan tanggal pengunduran dirinya tersebut dalam RUPS berikutnya.

Selain itu, anggota Dewan Komisaris berakhir jabatannya dengan sendirinya jika:

1. Meninggal dunia;
2. Di bawah pengampunan berdasarkan suatu putusan pengadilan;
3. Tidak lagi memenuhi persyaratan perundang-undangan yang berlaku, dengan memperhatikan peraturan di bidang pasar modal; dan
4. Berdasarkan keputusan RUPS.

## Resignation and Termination of the Board of Commissioners

Based on BOC Charter, a member of the Board of Commissioners is entitled to resign from his/her position by sending a written notification related to such intention to the Bank within no later than 30 days prior to the resignation date. The resigning member of the Board of Commissioners can still be held accountable for all actions taken effective from his/her appointment up to the day of his/her resignation in the subsequent GMS.

In addition, a member of Boards of Commissioners' term of office shall terminate in the event that such member is:

1. Deceased;
2. Under a guardianship based on a court decision;
3. No longer meets the requirements of the applicable regulations, with due observance of the regulations in capital market sector; and
4. Terminated based on GMS resolution.

## Direksi Board of Directors

Direksi merupakan organ tata kelola yang berwenang dan bertanggung jawab penuh atas kepengurusan Bank sesuai dengan maksud dan tujuan Bank serta mewakili Bank, baik di dalam maupun di luar pengadilan sesuai dengan ketentuan Anggaran Dasar dan peraturan perundang-undangan yang berlaku. Direksi menjalankan tugas secara bersama dan masing-masing sesuai pembedangannya, dengan tujuan mencapai Visi dan Misi Bank, serta meningkatkan nilai tambah bagi pemangku kepentingan dan memastikan keberlanjutan usaha.

### Pedoman Direksi

Dalam melaksanakan tugas dan tanggung jawabnya, Direksi berpedoman pada *Board of Directors Charter (BOD Charter)* PT Bank Victoria International Tbk yang telah dimutakhirkan melalui Surat Keputusan Direksi No. 002/SK-DIR/05/19 tanggal 2 Mei 2019. Penyusunan *BOD Charter* Bank Victoria mengacu pada Undang-Undang Perseroan Terbatas, Surat Edaran Bank Indonesia tentang Pelaksanaan *Good Corporate Governance* bagi Bank Umum, Peraturan Otoritas Jasa Keuangan tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik, Peraturan Otoritas Jasa Keuangan tentang Tata Kelola bagi Bank Umum, serta Anggaran Dasar Bank.

### Tugas dan Tanggung Jawab Direksi

Tugas dan tanggung jawab Direksi berdasarkan *BOD Charter* dijelaskan sebagai berikut.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Melaksanakan fungsi kepengurusan Bank secara efektif dan efisien, serta mewakili Bank, baik di dalam maupun di luar pengadilan.</p> <p>Conducting the Bank's management function in an effective and efficient manner, and representing the Bank both in and out of court.</p>	<p>Direksi telah melaksanakan fungsi kepengurusan Bank selama tahun 2021 secara efektif dan efisien, serta mewakili Bank, baik di dalam maupun di luar pengadilan.</p> <p>The Board of Directors performed the management functions of the Bank throughout 2021 effectively and efficiently, and represented the Bank, both inside and outside the court.</p>
<p>Melaksanakan prinsip-prinsip GCG dalam setiap kegiatan usaha Bank pada seluruh tingkatan dan jenjang organisasi dengan tetap memperhatikan prinsip kehati-hatian dan kepatuhan terhadap ketentuan yang berlaku.</p> <p>To implement GCG principles in each of the Bank's business activities at all levels or ranks of the organization by observing the prudential principle and complying with the applicable provisions.</p>	<p>Memastikan pelaksanaan tata kelola perusahaan yang efektif, baik secara individual maupun konsolidasian. Hal ini dibuktikan Bank Victoria berada pada kategori "Baik" artinya Bank telah melakukan penerapan tata kelola yang secara umum baik di tahun 2021, tercermin dari penerapan 11 (sebelas) aspek yang telah dituangkan dalam analisis.</p> <p>Ensuring effective corporate governance implementation, either individually or consolidated. This was proven by Bank Victoria by obtaining the category of "Good", meaning the Bank implemented governance which is in generally good in 2021, as reflected in the implementation of 11 (eleven) aspects outlined in the analysis.</p>

The Board of Directors is a governance organ holding full authority and responsibility to manage the Bank according to the Bank's objectives and purposes and to represent the Bank, either in or out of a court, pursuant to the provisions of the Articles of Association and prevailing laws and regulations. The Board of Directors performs the duties together, according to the field assigned respectively, with the intention to achieve the Bank's Vision and Mission, and to enhance added value for stakeholders and ensure business sustainability.

### Board of Directors Charter

In implementing its duties and responsibilities, the Board of Directors refers to the Board of Directors Charter (BOD Charter) of PT Bank Victoria International Tbk, which was updated under the Board of Directors' Decision Letter No. 002/SK-DIR/05/19 dated 2 May 2019. The preparation of Bank Victoria's BOD Charter refers to Law on Limited Liability Company, Bank Indonesia Circular on Implementation of Good Corporate Governance for Commercial Banks, Financial Services Authority Regulation on Board of Directors and Board of Commissioners of Issuers or Public Companies, Financial Services Authority Regulation on Governance for Commercial Banks, and the Bank's Articles of Association.

### Duties and Responsibilities of the Board of Directors

Duties and responsibilities of the Board of Directors based on BOD Charter are described hereinbelow.

Tugas dan Tangung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Menyusun strategi usaha dan arah kebijakan sesuai dengan Visi dan Misi Bank yang telah ditetapkan dengan Rencana Bisnis Bank, serta bertanggung jawab mengawasi dan melaksanakan dari waktu ke waktu dan menjamin partisipasi seluruh karyawan untuk ikut berperan sesuai dengan bidang dan kompetensi masing-masing.</p> <p>To formulate business strategies and policy direction in line with the Bank's Vision and Mission that are stipulated in the Banks' Business Plan, and be responsible for supervising and implementing from time to time and ensuring participation of all employees in taking part in accordance with their respective areas and competences.</p>	<p>Direksi telah menyusun strategi usaha yang ditetapkan dalam Rencana Bisnis Bank 2021-2023, antara lain:</p> <ol style="list-style-type: none"> <li>Kebijakan dan strategi manajemen;</li> <li>Penerapan manajemen risiko dan kinerja Bank saat ini;</li> <li>Proyeksi laporan keuangan (2021-2023) beserta asumsi yang digunakan;</li> <li>Proyeksi rasio-rasio dan pos-pos tertentu lainnya;</li> <li>Rencana pendanaan;</li> <li>Rencana penanaman dana;</li> <li>Rencana penyertaan permodalan;</li> <li>Rencana permodalan;</li> <li>Rencana pengembangan organisasi dan sumber daya manusia;</li> <li>Rencana penerbitan produk dan/atau pelaksanaan aktivitas baru;</li> <li>Rencana pengembangan dan/atau perubahan jaringan kantor; dan</li> <li>Informasi lainnya.</li> </ol> <p>The Board of Directors has prepared business strategies as set out in the Bank's Business Plan 2021-2023, which include:</p> <ol style="list-style-type: none"> <li>Management policies and strategies;</li> <li>Implementation of risk management and current performance of the Bank;</li> <li>Projected financial statements (2021-2023) and the assumptions used;</li> <li>Projected ratios and certain other items;</li> <li>Funding plan;</li> <li>Investment plan;</li> <li>Equity participation plan;</li> <li>Capital plan;</li> <li>Organizational and human resource development plan;</li> <li>Plans for product issuance and/or implementation of new activities;</li> <li>Office network development and/or change plan; and</li> <li>Other information.</li> </ol>
<p>Menyusun dan menetapkan struktur organisasi Bank beserta uraian tugas, wewenang dan tanggung jawab, serta mengelola sumber daya Bank secara optimal.</p> <p>To prepare and establish the Bank's organizational structure including the job description, authority, and responsibilities as well as to optimally manage the Bank's resources.</p>	<p>Pada tahun 2021, Direksi telah menetapkan struktur organisasi yang tercantum dalam Surat Keputusan Direksi PT Bank Victoria International Tbk No. 023/SK-DIR/11/21 tanggal 25 November 2021.</p> <p>In 2021, the Board of Directors established the organizational structure as stated in the Board of Directors' Decision Letter of PT Bank Victoria International Tbk No. 023/SK-DIR/11/21 dated 25 November 2021.</p>
<p>Mengungkapkan kepada seluruh karyawan kebijakan Bank yang bersifat strategis di bidang kepegawaian, termasuk meningkatkan pengetahuan dan penetapan remunerasi sesuai dengan kemampuan Bank dan lingkungan <i>peer group</i>, serta menciptakan jenjang karier yang baik dan terbuka dengan menerapkan <i>reward and punishment</i> (promosi, demosi, mutasi, dan pemutusan hubungan kerja).</p> <p>To disclose to all employees on the Bank's strategic policy in employment sector, including to improve knowledge and determine remuneration according to the Bank's capability and peer group environment, and establish a good and open career path by applying reward and punishment system (promotion, demotion, transfer, and termination of employment).</p>	<p>Menyampaikan kebijakan strategis Bank di bidang kepegawaian melalui Kode Etik Kepegawaian berdasarkan Surat Keputusan Direksi No. 001/SK-DIR/01/21 tanggal 11 Januari 2021 tentang Pedoman Kode Etik Karyawan PT Bank Victoria International Tbk. Direksi juga telah memberikan promosi kepada jabatan yang lebih tinggi sebanyak 21 karyawan dan mutasi pada jenjang yang selevel sebanyak 150 karyawan.</p> <p>Disclosed the Bank's strategic policy on employment through Employee's Code of Conduct based on Board of Directors' Decision Letter No. 001/SK-DIR/01/21 dated 11 January 2021 on PT Bank Victoria International Tbk's Guidelines of Employee's Code of Conduct. The Board of Directors also promoted 21 employees to higher positions and transferred 150 employees at the same level.</p>
<p>Menerapkan tata tertib serta ketentuan tentang benturan kepentingan yang mengikat dan wajib ditaati, termasuk pengaturan tentang mekanisme pengambilan keputusan dan hak bagi anggota Direksi, jika di antara mereka memiliki pendapat yang berbeda, termasuk hak untuk menyampaikan pendapat kepada Dewan Komisaris dan Otoritas Pengawas Bank atas hal-hal yang dapat membahayakan Bank.</p> <p>To apply the code of conduct and provisions of conflicts of interest, which are binding and must be adhered to, including to arrange the mechanism of decision making and the rights of members of the Board of Directors if they have dissenting opinions, including the right of expressing opinions to the Board of Commissioners and Bank's Supervisory Authority on any matters that can be detrimental to the Bank.</p>	<p>Bank Victoria telah mempunyai kebijakan dan prosedur dalam menyelesaikan benturan kepentingan. Kebijakan telah mengatur masing-masing elemen yang mengatur proses, mekanisme, serta personel yang berhak bertindak dalam pelaksanaannya.</p> <p>Bank Victoria already has policies and procedures in settling conflict of interest. The policies regulated each element governing the process, mechanism, and personnel eligible to act in the settlement process.</p>
<p>Memastikan kualitas serta akurasi laporan dan data keuangan yang disajikan untuk keperluan internal maupun eksternal, sesuai dengan Pernyataan Standar Akuntansi Keuangan (PSAK), Pedoman Akuntansi Perbankan Indonesia (PAPI), <i>International Accounting Standard (IAS)</i>, dan ketentuan lain yang berlaku dengan memberdayakan fungsi pengendalian internal secara efektif, termasuk peran Unit Kerja SKAI/<i>Integrated &amp; Anti Fraud</i>, Manajemen Risiko/Terintegrasi, dan Kepatuhan dan UKPN/Terintegrasi sebagai <i>quality assurance</i>.</p> <p>To ensure the quality and accuracy of financial statements and data presented for internal and external purposes in accordance with the Statement of Financial Accounting Standards (PSAK), Indonesian Banking Accounting Guidelines (PAPI), International Accounting Standard (IAS), and other applicable provisions by effectively empowering the internal control function, including the role of SKAI/Integrated &amp; Anti Fraud, Risk Management/Integrated, and Compliance and UKPN/Integrated Work Units as the quality assurance.</p>	<p>Mengevaluasi kualitas laporan dan data keuangan secara berkala. Direksi menilai di tahun 2021 kualitas laporan serta akurasi laporan dan data keuangan yang disajikan untuk keperluan internal maupun eksternal telah sesuai dengan Pernyataan Standar Akuntansi Keuangan (PSAK). Hal tersebut telah disampaikan melalui Surat Pernyataan Manajemen atas Laporan Keuangan Konsolidasian PT Bank Victoria International Tbk dan Entitas Anak pada tanggal dan untuk tahun yang berakhir pada 31 Desember 2021 yang dikeluarkan pada 28 April 2022.</p> <p>Evaluated the quality of financial statements and data periodically. The Board of Directors considers that in 2021 quality of reports and accuracy of the financial statements and data presented for internal and external purpose already complied with the Statement of Financial Accounting Standards (PSAK). The statement was submitted in a Management Statement of the Consolidated Financial Statements of PT Bank Victoria International Tbk and Subsidiaries on the date and year ended 31 December 2021 which was issued on 28 April 2022.</p>

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Memastikan bahwa temuan audit dan rekomendasi dari SKAI/<i>Integrated &amp; Anti Fraud</i> Bank, auditor eksternal, serta hasil pengawasan dan pemeriksaan Otoritas Jasa Keuangan dan/atau hasil pengawasan otoritas lainnya ditindaklanjuti dengan baik.</p> <p>To ensure that audit findings and recommendations made by the Bank's SKAI/<i>Integrated &amp; Anti-Fraud</i>, external auditor, and the monitoring and audit results by the Financial Services Authority and/or the monitoring result of other authority are followed up properly.</p>	<p>Direksi telah memantau pelaksanaan tindak lanjut dan rekomendasi atas temuan audit dengan baik dengan membuat laporan semesteran.</p> <p>The Board of Directors has properly monitored the implementation of follow-up and recommendations on audit findings by preparing semi-annual reports.</p>
<p>Mengungkapkan kepemilikan saham pada Bank Victoria maupun kepemilikan saham pada bank atau perusahaan lainnya, baik yang berkedudukan di dalam negeri ataupun di luar negeri, serta mengungkapkan keterkaitan hubungan keuangan, hubungan keluarga, dan keterkaitan lainnya dengan Pemegang Saham, anggota Dewan Komisaris, dan anggota Direksi.</p> <p>To disclose the shareholding at Bank Victoria and the shareholding in other banks or companies, both domiciled within and outside the country, and disclose the connections of financial relationship, family relationship, and other connections with the Shareholders, members of the Board of Commissioners, and members of the Board of Directors.</p>	<p>Menyampaikan laporan kepemilikan saham dan hubungan afiliasi kepada Otoritas Jasa Keuangan, serta mengungkapkannya melalui Laporan Tahunan.</p> <p>Submitted reports on shareholding and affiliation relationship to the Financial Services Authority, and disclosed the information in the Annual Report.</p>

## Ruang Lingkup Pekerjaan dan Tanggung Jawab Masing-Masing Anggota Direksi

Berdasarkan Surat Keputusan Dewan Komisaris No. 001/SK-KOM/06/20 tanggal 26 Juni 2020 tentang Pembagian Tugas dan Wewenang Anggota Board of Directors PT Bank Victoria International Tbk, maka masing-masing anggota Direksi menjalankan tugas dan tanggung jawab sebagai berikut.

## Scope of Work and Responsibility of Each Member of Board of Directors

Based on Board of Commissioners' Decision Letter No. 001/SK-KOM/06/20 dated 26 June 2020 on Distribution of Duties and Authority of Members of Board of Directors of PT Bank Victoria International Tbk, each member of the Board of Directors performs the following duties and responsibilities.

### Ahmad Fajar Direktur Utama President Director

Koordinasi pengelolaan Bank Victoria yang membawahi Divisi:

1. *SEVP of Change Management Office*;
2. *SKAI/Integrated & Anti Fraud*;
3. *Corporate Legal*;
4. *Treasury*;
5. *Information Technology*; dan
6. *Marketing Communication Unit*.

Coordination of Bank Victoria management which oversees the Division:

1. *SEVP of Change Management Office*;
2. *SKAI/Integrated & Anti Fraud*;
3. *Corporate Legal*;
4. *Treasury*;
5. *Information Technology*; and
6. *Marketing Communication Unit*.

### Rusli Wakil Direktur Utama Deputy President Director

Wakil Direktur Utama yang membawahi Divisi:

1. *SEVP of Operations & International Banking*;
2. *Special Asset Management Division*;
3. *International Banking Division*;
4. *Human Capital Management & General Affair Division*;
5. *Credit Risk Review Division*;
6. *Operations & Internal Control Division*;
7. *Liabilities & Wealth Product Unit*; serta
8. *E-Channel & Digital Banking Unit*.

Deputy President Director in charge of Divisions of:

1. *SEVP of Operations & International Banking*;
2. *Special Asset Management Division*;
3. *International Banking Division*;
4. *Human Capital Management & General Affair Division*;
5. *Credit Risk Review Division*;
6. *Operations & Internal Control Division*;
7. *Liabilities & Wealth Product Unit*; and
8. *E-Channel & Digital Banking Unit*.

### Lembing Direktur Director

Direktur Bisnis yang membawahi Divisi:

1. *SEVP of Corporate & Commercial Banking*;
2. *SME Banking Division*;
3. *Branch Banking Network & Performance Division*;
4. *Commercial Banking*;
5. *Corporate Lending Multifinance & Consumer Banking Division*; serta
6. *Credit Monitoring & Assurance*.

Director of Business in charge of Divisions of:

1. *SEVP of Corporate & Commercial Banking*;
2. *SME Banking Division*;
3. *Branch Banking Network & Performance Division*;
4. *Commercial Banking*;
5. *Corporate Lending Multifinance & Consumer Banking Division*; and
6. *Credit Monitoring & Assurance*.

**Debora Wahjutirto Tanoyo**  
**Direktur**  
**Director**

Direktur Keuangan dan Loan Admin yang membawahi Divisi:

1. SEVP of Finance, Accounting & Strategic Performance Management;
2. Financing & Accounting Division;
3. Loan & Trade Operation Division;
4. MIS Unit;
5. Strategic Performance Management Unit; serta
6. Credit Legal Unit.

Director of Finance and Loan Admin in charge of Divisions of:

1. SEVP of Finance, Accounting & Strategic Performance Management;
2. Financing & Accounting Division;
3. Loan & Trade Operation Division;
4. MIS Unit;
5. Strategic Performance Management Unit; and
6. Credit Legal Unit.

**Tamunan**  
**Direktur Kepatuhan dan Manajemen Risiko**  
**Director of Compliance and Risk Management**

Direktur Kepatuhan dan Manajemen Risiko yang membawahi Divisi:

1. Compliance/Integrated, AML, & System Procedure Division;
2. Risk Management/Integrated Division; serta
3. Corporate Secretary Division.

Director of Compliance and Risk Management in charge of Divisions of:

1. Compliance/Integrated, AML, & System Procedure Division;
2. Risk Management/Integrated Division; and
3. Corporate Secretary Division.

## Komposisi Direksi

Komposisi anggota Direksi berdasarkan BOD *Charter* minimal berjumlah 3 (tiga) orang yang terdiri dari 1 (satu) orang Direktur Utama dan 2 (dua) orang Direktur atau lebih. Apabila dipandang perlu, dapat diangkat seorang atau lebih sebagai Wakil Direktur Utama. Masa jabatan Dewan Komisaris Bank adalah 3 (tiga) tahun sejak diangkat dalam RUPS dengan tidak mengurangi hak RUPS untuk memberhentikan Direksi sewaktu-waktu dengan memperhatikan ketentuan Anggaran Dasar.

Setiap anggota Direksi Bank harus memenuhi persyaratan sebagai berikut.

1. Persyaratan Formal
  - a. Cakap melakukan perbuatan hukum;
  - b. Dalam 5 (lima) tahun sebelum pengangkatan dan selama menjabat:
    - 1) Tidak pernah dinyatakan pailit;
    - 2) Tidak pernah menjadi anggota Direksi yang dinyatakan bersalah menyebabkan suatu bank dinyatakan pailit;
    - 3) Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan;
    - 4) Tidak pernah menjadi anggota Direksi yang selama menjabat:
      - Pernah tidak menyelenggarakan RUPS Tahunan;
      - Pertanggungjawabannya sebagai anggota Direksi pernah tidak diterima oleh RUPS atau pernah tidak memberikan pertanggungjawaban sebagai anggota Direksi kepada RUPS; dan
      - Pernah menyebabkan Bank yang memperoleh izin, persetujuan, atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan Laporan Tahunan dan/atau Laporan Keuangan kepada Otoritas Jasa Keuangan.

## Composition of the Board of Directors

Composition of Board of Directors' members according to BOD Charter shall at least comprises 3 (three) members, namely 1 (one) President Director and 2 (two) or more Directors. If deemed necessary, one or more Deputy President Directors can be appointed. Term of office of the Bank's Board of Directors is for 3 (three) years effective from the appointment in the GMS, without prejudice to the the GMS's right to dismiss the Board of Directors at any given time with due observance of the provisions of the Articles of Association.

Each member of the Board of Directors must meet the following requirements.

1. Formal Requirements
  - a. Capable in performing legal actions;
  - b. Within 5 (five) years before appointment and during the term of office:
    - 1) Never been declared bankrupt;
    - 2) Never become a member of Board of Directors who is found guilty of causing a bank to be declared bankrupt;
    - 3) Never been punished for committing a criminal act that is detrimental to the state finances and/or related to the financial sector;
    - 4) Never been the member of Board of Directors who is during the term of office:
      - Has ever not convening an Annual GMS;
      - Has ever had his/her accountability as the member of Board of Directors rejected by the GMS or has ever been absent in giving his/her accountability as the member of Board of Directors to the GMS; and
      - Has ever caused a Bank that obtains permit, approval, or registration from the Financial Services Authority not to fulfill its obligation in submitting its Annual Report and/or Financial Statements to the Financial Services Authority.



2. Persyaratan Material
- Mempunyai akhlak, moral, dan integritas yang baik;
  - Memiliki komitmen untuk mematuhi peraturan perundang-undangan; serta
  - Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan untuk menjalankan tugasnya.
3. Persyaratan Lainnya
- Anggota Direksi dilarang memangku jabatan rangkap, apabila jabatan rangkap tersebut bertentangan dengan peraturan perundang-undangan dan/atau apabila jabatan rangkap tersebut mungkin dapat menimbulkan benturan kepentingan.

Mengacu pada ketentuan dan persyaratan tersebut, Direksi Bank Victoria beranggotakan 5 (lima) orang, yang terdiri dari 1 (satu) orang Direktur Utama, 1 (satu) orang Wakil Direktur Utama, 2 (dua) orang Direktur, 1 (satu) orang Direktur Kepatuhan dan Manajemen Risiko. Berikut komposisi keanggotaan Direksi Bank per 31 Desember 2021.

2. Material Requirements
- Has good character, morals, and integrity;
  - Has a commitment to comply with the laws and regulations; and
  - Has knowledge and/or expertise in the field required to perform the duties.
3. Other Requirements
- The member of Board of Directors are not allowed to hold concurrent positions if they are contrary to the laws and regulations and/or if they possibly lead to the conflict of interest.

Referring to the above provisions and requirements, Bank Victoria's Board of Directors consists of 5 (five) personnel, namely 1 (one) President Director, 1 (one) Deputy President Director, 2 (two) Directors, 1 (one) Compliance and Risk Management Director. The following is the composition of the Board of Directors' members as of 31 December 2021.

<b>Nama Name</b>	<b>Jabatan Position</b>	<b>Dasar Pengangkatan Pertama Kali dan Periode Menjabat Basis of First Appointment and Term of Office</b>	<b>Dasar Pengangkatan Kembali dan Periode Menjabat Basis of Re-appointment and Term of Office</b>
Ahmad Fajar	Direktur Utama President Director	Keputusan RUPS Tahunan tanggal 18 Mei 2018 (2018-2019) Annual GMS Resolution dated 18 May 2018 (2018-2019)	Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022) Annual GMS Resolution dated 10 May 2019 (2019-2022)
Rusli	Wakil Direktur Utama Deputy President Director	Keputusan RUPS Luar Biasa tanggal 29 Februari 2016 (2016) Extraordinary GMS Resolutions dated 29 February 2016 (2016)	Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019) Annual GMS Resolution dated 24 June 2016 (2016-2019) Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022) Annual GMS Resolution dated 10 May 2019 (2019-2022)
Lembing	Direktur Director	Keputusan RUPS Tahunan tanggal 18 Mei 2018 (2018-2019) Annual GMS Resolution dated 18 May 2018 (2018-2019)	Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022) Annual GMS Resolution dated 10 May 2019 (2019-2022)
Debora Wahjutirto Tanoyo	Direktur Director	Keputusan RUPS Tahunan tanggal 18 Mei 2018 (2018-2019) Annual GMS Resolution dated 18 May 2018 (2018-2019)	Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022) Annual GMS Resolution dated 10 May 2019 (2019-2022)
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	Keputusan RUPS Tahunan tanggal 27 Juni 2008 (2008-2010) Annual GMS Resolution dated 27 June 2008 (2008-2010)	Keputusan RUPS Tahunan tanggal 25 Juni 2010 (2010-2013) Annual GMS Resolution dated 25 June 2010 (2010-2013) Keputusan RUPS Tahunan tanggal 28 Juni 2013 (2013-2016) Annual GMS Resolution dated 28 June 2013 (2013-2016) Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019) Annual GMS Resolution dated 24 June 2016 (2016-2019) Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022) Annual GMS Resolution dated 10 May 2019 (2019-2022)



Anggota Direksi yang menjabat wajib memperoleh persetujuan (melalui *fit and proper test*) dari Otoritas Jasa Keuangan sebelum menjalankan tindakan, tugas, dan fungsinya sebagai Direksi sesuai dengan Peraturan Otoritas Jasa Keuangan No. 27/POJK.03/2016 tentang Penilaian Kemampuan dan Kepatutan bagi Pihak Utama Lembaga Jasa Keuangan. Hal ini berguna untuk membuktikan bahwa anggota Direksi telah memiliki integritas, kompetensi, dan reputasi keuangan yang memadai. Berikut informasi pelaksanaan *fit and proper test* Direksi.

Members of the Board of Directors holding the position must obtain approval (through *fit and proper test*) from the Financial Services Authority prior to carrying out their actions, duties, and functions as the Board of Directors in accordance with Financial Services Authority Regulation No. 27/POJK.03/2016 on Fit and Proper Test for Key Parties of Financial Services Institution. This is to indicate that members of Board of Directors have adequate integrity, competencies, and financial reputation. Information on the implementation of *fit and proper test* for the Board of Directors is described as follows.

Nama Name	Jabatan Position	Pelaksana Organizer	Hasil Result	Tanggal Efektif Effective Date
Ahmad Fajar	Direktur Utama President Director	Otoritas Jasa Keuangan Financial Services Authority	Lulus Pass	30 Oktober 2018 30 October 2018
Rusli	Wakil Direktur Utama Deputy President Director	Otoritas Jasa Keuangan Financial Services Authority	Lulus Pass	16 Mei 2016 16 May 2016
Lembing	Direktur Director	Otoritas Jasa Keuangan Financial Services Authority	Lulus Pass	30 Oktober 2018 30 October 2018
Debora Wahjutirto Tanoyo	Direktur Director	Otoritas Jasa Keuangan Financial Services Authority	Lulus Pass	22 November 2018 22 November 2018
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	Bank Indonesia	Lulus Pass	24 Maret 2009 24 March 2009

## Program Orientasi bagi Direksi Baru dan Peningkatan Kapabilitas Direksi

Program orientasi bagi anggota Direksi baru Bank Victoria dijelaskan sebagai berikut.

1. Untuk anggota Direksi yang baru diangkat, wajib diberikan program pengenalan mengenai kondisi Bank secara umum;
2. Penanggungjawab atas program pengenalan tersebut adalah Sekretaris Perusahaan atau siapapun yang menjalankan fungsi sebagai Sekretaris Perusahaan;
3. Peningkatan kapabilitas dinilai penting agar Direksi dapat selalu memperbarui informasi tentang perkembangan terkini dari bisnis Bank dan peraturan perundang-undangan yang berlaku dan sebagai bentuk antisipasi atas masalah yang timbul di kemudian hari bagi keberlangsungan dan kemajuan Bank; serta
4. Program pengenalan Direksi meliputi dan tidak terbatas pada hal-hal berikut ini.
  - a. Pemberian Informasi yang terdapat pada situs laman Bank;
  - b. Pengenalan tentang seluruh sistem dan prosedur yang terdapat pada Intranet Bank;
  - c. Membawa keliling ke cabang-cabang terutama cabang besar; dan
  - d. Menginformasikan Laporan Tahunan.

## Orientation Program For New Members of Board of Directors and Competency Development for the Board of Directors

Orientation program for Bank Victoria's new members of Board of Directors is carried out as follows.

1. For newly appointed members of the Board of Directors, an orientation program regarding the Company's condition in general must be provided;
2. Person in charge of this orientation program is the Corporate Secretary, or anyone who performs such function as a Corporate Secretary;
3. Competency development is deemed important so that the Board of Directors can always update the information on the latest developments on the Bank's business and the applicable laws and regulations, and as a form of anticipation of problems arising in the future that can affect the Bank's sustainability and progress; and
4. The orientation program for the new Board of Directors includes and is not limited to the following matters.
  - a. Provision of information contained on the Bank's website;
  - b. Introduction on all systems and procedures contained in the Bank's intranet;
  - c. To take them for a visit to branch offices, especially to large branch offices; and
  - d. Providing information on the Annual Report.

**Pada tahun 2021, tidak ada perubahan dan pengangkatan Direksi baru, sehingga program orientasi bagi anggota Direksi yang baru diangkat tidak dilaksanakan.**

**In 2021, there were no changes nor appointment of new Board of Directors' members, and therefore, the orientation program for the newly appointed Board of Directors' members was not held.**

Informasi mengenai pengembangan kompetensi yang dilakukan Direksi selama tahun 2021 dapat dilihat pada bagian Profil Perusahaan dalam Laporan Tahunan ini.

Information regarding the competency development programs participated by the Board of Directors in 2021 can be seen in the Company Profile chapter in this Annual Report.

## Independensi dan Pengelolaan Benturan Kepentingan Direksi

Guna Direksi Bank dapat bertindak dengan sebaik-baiknya demi kepentingan Bank secara keseluruhan, Bank senantiasa menjaga independensi Direksi. Berdasarkan hal tersebut, Bank menetapkan ketentuan sebagai berikut.

1. Selain Direksi, pihak lain manapun dilarang melakukan atau campur tangan dalam kepengurusan Bank;
2. Direksi harus dapat mengambil keputusan secara objektif, tanpa benturan kepentingan dan bebas dari segala tekanan dari pihak manapun; serta
3. Anggota Direksi dilarang melakukan kegiatan yang dapat mengganggu independensinya dalam mengurus Bank.

Terkait hal tersebut, seluruh anggota Direksi harus mengambil sikap, pendapat, dan tindakan yang didasarkan atas unsur objektivitas, profesional, dan independen demi kepentingan Bank yang seimbang dengan kepentingan para pemangku kepentingan.

Berkaitan dengan pengelolaan benturan kepentingan, seluruh anggota Direksi dilarang berada dalam situasi atau kondisi tertentu dimana kepentingan anggota Direksi bertentangan dengan kepentingan Bank, namun apabila terjadi benturan kepentingan, maka harus diungkapkan serta anggota Direksi yang bersangkutan tidak boleh melibatkan diri dalam proses pengambilan keputusan Bank yang berkaitan dengan benturan kepentingan tersebut. Selain itu, setiap anggota Direksi diharuskan menandatangani Pakta Integritas yang berisikan komitmen bahwa dalam melaksanakan tugasnya, anggota Direksi tidak akan melakukan hal-hal yang dapat menimbulkan konflik kepentingan. Pakta Integritas tersebut disimpan dan diadministrasikan oleh Sekretaris Perusahaan.

## Rangkap Jabatan Direksi

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 tentang Penerapan Tata Kelola bagi Bank Umum, serta peraturan turunannya, Direksi dapat melakukan rangkap jabatan sepanjang yang bersangkutan tidak mengabaikan pelaksanaan tugas dan tanggung jawab

## Board of Directors' Independency and Management of Conflict of Interest

To enable the Bank's Board of Directors to act in the best interest of the Bank in overall, the Bank consistently maintains the Board of Directors' independency. Based on such matter, the Bank established the following provisions.

1. Other than the Board of Directors, other parties are not allowed to get involved in or interfere in the Bank's management;
2. The Board of Directors must be able to make decision objectively, without conflict of interest, and free from any pressures from any party; and
3. Members of Board of Directors are not allowed to conduct any activities that can disrupt their independence in managing the Bank.

In relation to that, all members of the Board of Directors must adopt their attitude, express their opinion, and take their action objectively, professionally, and independently, for the sake of the Bank's balanced interests and for the stakeholders' interests.

With regards to the management of conflict of interest, all members of the Board of Directors are prohibited from being involved in certain situation or condition, in which the members of the Board of Directors' interests contradict the Bank's interests. However, in case of any conflict of interest, such conflict must be disclosed and the related member of the Board of Directors is prohibited from being involved in any of the Bank's decision-making process with related to such conflict of interest. Furthermore, each member of the Board of Directors must sign an Integrity Pact containing commitment to perform the duties. Members of the Board of Directors shall not carry out any actions that may cause any conflict of interest. The Integrity Pact will be kept and administered by the Corporate Secretary.

## Board of Directors' Concurrent Position

According to Financial Services Authority Regulation No. 55/POJK.03/2016 on the Implementation of Governance for Commercial Banks and its derivative regulations, the Board of Directors may hold a concurrent position to the extent that the relevant party does not neglect the execution of the

sebagai anggota Direksi Bank. Penjelasan terkait ketentuan rangkap jabatan Direksi diuraikan sebagai berikut.

1. Anggota Direksi dilarang merangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris atau pejabat eksekutif pada bank, perusahaan dan/atau lembaga lain; dan
2. Tidak termasuk rangkap jabatan sebagaimana dimaksud pada poin 1 (satu) dalam hal Direksi, yang bertanggung jawab terhadap pengawasan atas penyertaan Bank pada Entitas Anak, menjalankan tugas fungsional menjadi anggota Dewan Komisaris pada Entitas Anak bukan bank yang dikendalikan oleh Bank.

Informasi terkait rangkap jabatan anggota Direksi Bank Victoria diungkapkan sebagai berikut.

duties and responsibilities as a member of the Bank's Board of Directors. Provisions related to Board of Directors' concurrent position are as set out below.

1. The members of the Board of Directors are prohibited from holding concurrent position as members of the Board of Directors, members of the Board of Commissioners, or executive officers of other banks, companies, and/or institutions; and
2. The provision on concurrent position as referred to in point 1 (one) is not applicable in the event that a member of the Board of Directors who is responsible for monitoring the Bank's participation in the Subsidiary, performs functional duties of becoming a member of the Board of Commissioners in a non-bank Subsidiary controlled by the Bank.

Information related to the concurrent positions of Bank Victoria's Board of Directors members' is disclosed in the table below.

Nama Name	Jabatan Position	Rangkap Jabatan pada Perusahaan/Instansi Lain Concurrent Position at Other Company/Institution	
		Jabatan Position	Nama Perusahaan/ Instansi Name of Company/ Institution
Ahmad Fajar	Direktur Utama President Director	-	-
Rusli	Wakil Direktur Utama Deputy President Director	-	-
Lembing	Direktur Director	-	-
Debora Wahjutirto Tanoyo	Direktur Director	-	-
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	-	-

## Kepemilikan Saham Direksi

Mengacu pada Peraturan Otoritas Jasa Keuangan tentang Penerapan Tata Kelola bagi Bank Umum, Direksi harus mengungkapkan kepemilikan saham yang mencapai 5,00% atau lebih, baik pada Bank Victoria maupun pada bank dan perusahaan lain, yang berkedudukan di dalam ataupun di luar negeri. Kepemilikan saham anggota Direksi pada Bank Victoria dan pada bank atau perusahaan lain diungkapkan sebagai berikut.

## Board of Directors' Shareholding

Referring to the Financial Services Authority Regulation on the Implementation of Governance for Commercial Banks, the Board of Directors' members must disclose their shareholdings reaching 5.00% or more, either in Bank Victoria or in other banks and companies domiciled inside or outside of the country. Information related to the Board of Directors' shareholding at other banks or companies are is disclosed below.

Nama Name	Jabatan Position	Kepemilikan Saham Shareholding (%)			
		Bank Victoria	Bank Lain Other Banks	Lembaga Keuangan Non-Bank Non-Bank Financial Institution	Perusahaan Lain Other Companies
Ahmad Fajar	Direktur Utama President Director	-	-	-	-
Rusli	Wakil Direktur Utama Deputy President Director	-	-	-	-
Lembing	Direktur Director	-	-	-	-
Debora Wahjutirto Tanoyo	Direktur Director	-	-	-	-
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	-	-	-	-

## Rapat Direksi

### Kebijakan Rapat Direksi

Berdasarkan BOD *Charter*, rapat Direksi dilaksanakan secara berkala minimal 1 (satu) kali dalam 1 (satu) bulan. Rapat Direksi juga dapat diadakan setiap waktu apabila dianggap perlu oleh salah seorang anggota Direksi atau atas permintaan dari rapat Dewan Komisaris atau atas permintaan tertulis 1 (satu) Pemegang Saham atau lebih yang (bersama-sama) memiliki sedikitnya 1/10 bagian dari jumlah semua saham dengan hak suara yang sah yang dikeluarkan Bank. Rapat Direksi dapat diselenggarakan apabila dihadiri secara fisik ataupun secara telekonferensi oleh ½ bagian atau lebih dari jumlah anggota Direksi.

Selain rapat internal, Direksi wajib mengadakan rapat gabungan dengan Dewan Komisaris minimal 1 (satu) kali dalam 2 (dua) bulan untuk membahas perkembangan dari laporan kinerja Direksi serta rapat dengan Direktorat minimal 1 (satu) kali dalam 1 (satu) bulan.

### Frekuensi dan Kehadiran Rapat Direksi

Pada tahun 2021, Direksi menghadiri rapat internal dan rapat gabungan secara fisik dan virtual. Informasi frekuensi dan tingkat kehadiran Direksi dalam rapat internal dan gabungan dijelaskan sebagai berikut.

## Board of Directors' Meetings

### Board of Directors' Meetings Policy

Based on BOD Charter, Board of Directors' meetings must be held periodically at a minimum of once every 1 (one) month. Board of Directors' meeting can also be held at any given time as deemed necessary by any one member of the the Board of Directors or based upon request from the Board of Commissioners' meeting or based upon a written request from 1 (one) or more Shareholders who (jointly) represent at least 1/10 of the total shares issued with voting rights issued by the Bank. Board of Directors' meeting can be held if attended physically or through teleconference by ½ or more members of the Board of Directors.

In addition to internal meetings, the Board of Directors must hold joint meetings with the Board of Commissioners, at least once every 2 (two) months to discuss the development of the Board of Directors' performance report, and meetings with the Directorate at least once a month.

### Board of Directors' Meetings Frequency and Attendance

In 2021, the Board of Directors attended internal meetings and joint meetings physically and virtually. Information on the Board of Directors' meeting frequency and attendance rate in internal meetings and joint meetings is disclosed below.

Tanggal Date	Agenda	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtito Tanoyo	Tamunan
4 Januari 2021 4 January 2021	1. Arahan tahun 2021; 2. Target kredit; 3. Proyeksi <i>non-performing loan</i> 31 Desember 2020; 4. Kinerja keuangan 31 Desember 2020; dan 5. Paparan Direktorat.  1. Directions for 2021; 2. Loan targets; 3. Projections of non-performing loans 31 December 2020; 4. Financial performance 31 December 2020; and 5. Directorate presentation.	✓	✓	✓	✓	✓
11 Januari 2021 11 January 2021	1. Progres <i>pipeline</i> dan <i>booking</i> ; 2. Proyeksi <i>non-performing loan</i> ; 3. Kinerja keuangan 8 Januari 2021; 4. Tinjau ulang kinerja; dan 5. Paparan Direktorat.  1. Progress on pipeline and booking; 2. Projections of non-performing loans; 3. Financial performance 8 January 2021; 4. Performance review; and 5. Directorate presentation.	✓	✓	✓	✓	✓
18 Januari 2021 18 January 2021	1. Progres <i>pipeline</i> dan <i>booking</i> ; 2. Proyeksi <i>non-performing loan</i> ; 3. Kinerja keuangan 15 Januari 2021; 4. Tinjau ulang kinerja; dan 5. Paparan Direktorat.  1. Progress on pipeline and booking; 2. Projections of non-performing loans; 3. Financial performance 15 January 2021; 4. Performance review; and 5. Directorate presentation.	✓	✓	✓	✓	✓
25 Januari 2021 25 January 2021	1. Pergerakan <i>pipeline</i> dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 30 Desember 2020; 3. Kinerja keuangan 22 Januari 2021; dan 4. Paparan Direktorat.  1. Movement, pipeline, and monitoring of loans; 2. Projections of non-performing loans 31 December 2020; 3. Financial performance 22 January 2021; and 4. Directorate presentation.	✓	✓	✓	✓	✓
1 Februari 2021 1 February 2021	1. Pergerakan, <i>pipeline</i> , dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 30 Desember 2020; 3. Kinerja keuangan 31 Januari 2021; dan 4. Paparan Direktorat.  1. Movement, pipeline, and monitoring of loans; 2. Projections of non-performing loans 31 December 2020; 3. Financial performance 31 January 2021; and 4. Directorate presentation.	✓	✓	✓	✓	✓
9 Februari 2021 9 February 2021	1. Pergerakan, mutasi, <i>pipeline</i> , dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 28 Februari 2021; 3. Kinerja keuangan 5 Februari 2021; dan 4. Paparan Direktorat.  1. Movement, transfer, pipeline, and monitoring of loans; 2. Projections of non-performing loans 28 February 2021; 3. Financial performance of 5 February 2021; and 4. Directorate presentation.	✓	✓	✓	✓	✓
15 Februari 2021 15 February 2021	1. Pergerakan, mutasi, <i>pipeline</i> , dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> ; 3. Kinerja keuangan 11 Februari 2021; 4. Tinjau ulang kinerja; dan 5. Paparan Direktorat.  1. Movement, transfer, pipeline, and monitoring of loans; 2. Projections of non-performing loans; 3. Financial performance 11 February 2021; 4. Performance review; and 5. Directorate presentation.	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtiro Tanoyo	Tamunan
22 Februari 2021 22 February 2021	<ol style="list-style-type: none"> <li>Pergerakan, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i>;</li> <li>Kinerja keuangan 19 Februari 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans;</li> <li>Financial performance 19 February 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
1 Maret 2021 1 March 2021	<ol style="list-style-type: none"> <li>Pergerakan, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 28 Februari 2021;</li> <li>Kinerja keuangan 28 Februari 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 28 February 2021;</li> <li>Financial performance 28 February 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
8 Maret 2021 8 March 2021	<ol style="list-style-type: none"> <li>Pergerakan, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Maret 2021;</li> <li>Kinerja keuangan 5 Maret 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 March 2021;</li> <li>Financial performance 5 March 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
15 Maret 2021 15 March 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Maret 2021;</li> <li>Kinerja keuangan 12 Maret 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 March 2021;</li> <li>Financial performance 12 March 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	- (Dinas Luar Kota) (Out-of-Town Duty)	✓
22 Maret 2021 22 March 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Maret 2021;</li> <li>Kinerja keuangan 19 Maret 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 March 2021;</li> <li>Financial performance 19 March 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
29 Maret 2021 29 March 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Maret 2021;</li> <li>Kinerja keuangan 26 Maret 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 March 2021;</li> <li>Financial performance 26 March 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtito Tanoyo	Tamunan
5 April 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 April 2021;</li> <li>Kinerja Keuangan 31 Maret 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 April 2021;</li> <li>Financial performance 31 March 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
12 April 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 April 2021;</li> <li>Kinerja keuangan 9 April 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 April 2021;</li> <li>Financial performance 9 April 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
19 April 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 April 2021;</li> <li>Kinerja keuangan 16 April 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 April 2021;</li> <li>Financial performance 16 April 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
26 April 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 April 2021;</li> <li>Kinerja keuangan 23 April 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 April 2021;</li> <li>Financial performance 23 April 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
3 Mei 2021 3 May 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 April 2021;</li> <li>Kinerja keuangan 30 April 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 April 2021;</li> <li>Financial performance 30 April 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
10 Mei 2021 10 May 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Mei 2021;</li> <li>Kinerja keuangan 7 Mei 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 May 2021;</li> <li>Financial performance 7 May 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	- (Cuti) (On Leave)	✓



Tanggal Date	Agenda	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtiro Tanoyo	Tamunan
17 Mei 2021 17 May 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Mei 2021;</li> <li>Kinerja keuangan 11 Mei 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 May 2021;</li> <li>Financial performance 11 May 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
24 Mei 2021 24 May 2021	<ol style="list-style-type: none"> <li>Pergerakan mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Mei 2021;</li> <li>Kinerja keuangan 21 Mei 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 May 2021;</li> <li>Financial performance 21 May 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
7 Juni 2021 7 June 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Mei 2021;</li> <li>Kinerja keuangan 4 Juni 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 May 2021;</li> <li>Financial performance 4 June 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
14 Juni 2021 14 June 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Mei 2021;</li> <li>Kinerja keuangan 11 Juni 2021;</li> <li>Tinjau ulang <i>strategic performance management</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 May 2021;</li> <li>Financial performance 11 June 2021;</li> <li>Review of strategic performance management; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
21 Juni 2021 21 June 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 Juni 2021;</li> <li>Kinerja keuangan 18 Juni 2021; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 June 2021;</li> <li>Financial performance 18 June 2021; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
28 Juni 2021 28 June 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 Juni 2021;</li> <li>Kinerja keuangan 25 Juni 2021; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 June 2021;</li> <li>Financial performance 25 June 2021; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
5 Juli 2021 5 July 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Juli 2021;</li> <li>Kinerja keuangan 30 Juni 2021; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 July 2021;</li> <li>Financial performance 30 June 2021; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtito Tanoyo	Tamunan
12 Juli 2021 12 July 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Juli 2021;</li> <li>Kinerja keuangan 9 Juli 2021;</li> <li><i>Peer group</i> 2021; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 July 2021;</li> <li>Financial performance per 9 July 2021;</li> <li>Peer group 2021; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
19 Juli 2021 19 July 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Juli 2021;</li> <li>Kinerja keuangan 16 Juli 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 July 2021;</li> <li>Financial performance 16 July 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
26 Juli 2021 26 July 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Juli 2021;</li> <li>Kinerja keuangan 23 Juli 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 July 2021;</li> <li>Financial performance 23 July 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
2 Agustus 2021 2 August 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Juli 2021;</li> <li>Kinerja keuangan 31 Juli 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 July 2021;</li> <li>Financial performance 31 July 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
9 Agustus 2021 9 August 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Agustus 2021;</li> <li>Kinerja keuangan 6 Agustus 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 August 2021;</li> <li>Financial performance 6 August 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
16 Agustus 2021 16 August 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Agustus 2021;</li> <li>Kinerja keuangan 13 Agustus 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 August 2021;</li> <li>Financial performance 13 August 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtiro Tanoyo	Tamunan
23 Agustus 2021 23 August 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Agustus 2021;</li> <li>Kinerja keuangan 20 Agustus 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 August 2021;</li> <li>Financial performance 20 August 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
30 Agustus 2021 30 August 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Agustus 2021;</li> <li>Kinerja keuangan 20 Agustus 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 August 2021;</li> <li>Financial performance 20 August 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
6 September 2021	<ol style="list-style-type: none"> <li>Arahan Direktur Utama;</li> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 September 2021;</li> <li>Kinerja keuangan 31 Agustus 2021; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Directions of President Director;</li> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 September 2021;</li> <li>Financial performance 31 August 2021; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
14 September 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 September 2021;</li> <li>Kinerja keuangan 10 September 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 September 2021;</li> <li>Financial performance 10 September 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
20 September 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 September 2021;</li> <li>Kinerja keuangan 10 September 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 September 2021;</li> <li>Financial performance 10 September 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
28 September 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 September 2021;</li> <li>Kinerja keuangan 24 September 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 September 2021;</li> <li>Financial performance 24 September 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtito Tanoyo	Tamunan
4 Oktober 2021 4 October 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Oktober 2021;</li> <li>Kinerja keuangan 30 September 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 October 2021;</li> <li>Financial performance 30 September 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
11 Oktober 2021 11 October 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Oktober 2021;</li> <li>Kinerja keuangan 8 Oktober 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 October 2021;</li> <li>Financial performance 8 October 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
18 Oktober 2021 18 October 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Oktober 2021;</li> <li>Kinerja keuangan 15 Oktober 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 October 2021;</li> <li>Financial performance 15 October 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
25 Oktober 2021 25 October 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Oktober 2021;</li> <li>Kinerja keuangan 22 Oktober 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 October 2021;</li> <li>Financial performance 22 October 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
1 November 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 November 2021;</li> <li>Kinerja keuangan 22 Oktober 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 November 2021;</li> <li>Financial performance 22 October 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	- (Cuti) (On Leave)	✓	✓	✓
8 November 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 November 2021;</li> <li>Kinerja keuangan 5 November 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 November 2021;</li> <li>Financial performance 5 November 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtiro Tanoyo	Tamunan
15 November 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 November 2021;</li> <li>Kinerja keuangan 12 November 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 November 2021;</li> <li>Financial performance 12 November 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	- (Dinas Luar Kota)  (Out-of- Town Duty)	- (Dinas Luar Kota)  (Out-of- Town Duty)	✓
22 November 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 November 2021;</li> <li>Kinerja keuangan 19 November 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 November 2021;</li> <li>Financial performance 19 November 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
29 November 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 30 November 2021;</li> <li>Kinerja keuangan 26 November 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 30 November 2021;</li> <li>Financial performance 26 November 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
6 Desember 2021 6 December 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Desember 2021;</li> <li>Kinerja keuangan 30 November 2021;</li> <li>Tinjau ulang kinerja;</li> <li>Evaluasi <i>risk appetite</i>; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 December 2021;</li> <li>Financial performance 30 November 2021;</li> <li>Performance review;</li> <li>Evaluation of risk appetite; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	- (Cuti) (On Leave)	✓	- (Cuti) (On Leave)
13 Desember 2021 13 December 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Desember 2021;</li> <li>Kinerja keuangan 10 Desember 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 December 2021;</li> <li>Financial performance 10 December 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
20 Desember 2021 20 December 2021	<ol style="list-style-type: none"> <li>Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Desember 2021;</li> <li>Kinerja keuangan 17 Desember 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Movement, transfer, pipeline, and monitoring of loans;</li> <li>Projections of non-performing loans 31 December 2021;</li> <li>Financial performance 17 December 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	- (Cuti) (On Leave)	✓

Tanggal Date	Agenda	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtito Tanoyo	Tamunan
27 Desember 2021 27 December 2021	1. Pergerakan, mutasi, <i>pipeline</i> , dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 31 Desember 2021; 3. Kinerja keuangan 24 Desember 2021; dan 4. Paparan Direktorat.  1. Movement, transfer, pipeline, and monitoring of loans; 2. Projections of non-performing loans 31 December 2021; 3. Financial performance 24 December 2021; and 4. Directorate presentation.	✓	✓	✓	- (Cuti) (On Leave)	✓
<b>Total Kehadiran dalam Rapat</b> Total Meeting Attendance		<b>51</b>	<b>50</b>	<b>49</b>	<b>46</b>	<b>50</b>
<b>Total Rapat</b> Total Meetings		<b>51</b>	<b>51</b>	<b>51</b>	<b>51</b>	<b>51</b>
<b>Tingkat Kehadiran (%)</b> Attendance Rate (%)		<b>100.00</b>	<b>98.04</b>	<b>96.08</b>	<b>90.20</b>	<b>98.04</b>
<b>Rata-rata Kehadiran (%)</b> Average Attendance (%)				<b>96.47</b>		

### Rapat Gabungan Direksi dengan Dewan Komisaris

Agenda rapat gabungan Dewan Komisaris dan Direksi telah diungkapkan dalam rapat Dewan Komisaris.

### Joint Meeting of Board of Directors and Board of Commissioners

The agenda of joint meeting of the Board of Commissioners and Board of Directors has been disclosed in the Board of Commissioners' Meetings.

### Persetujuan dan Rekomendasi Direksi

Pada tahun 2021, Direksi telah memberikan persetujuan serta rekomendasi sebagai upaya perbaikan kinerja Bank yang diuraikan pada tabel berikut.

### Board of Directors' Approvals and Recommendations

In 2021, the Board of Directors gave approvals and recommendations as efforts in improving the Bank's performance, as disclosed in the table below.

No. Surat Letter No.	Tanggal Date	Keputusan Decisions
<b>Kajian Kebijakan dan Prosedur</b> Review of Policy and Procedure		
001/SK-DIR/01/21	11 Januari 2021 11 January 2021	Pedoman Kode Etik Perilaku Karyawan Employee Ethics Guidelines
003/SK-DIR/01/21	19 Januari 2021 19 January 2021	Standar Operasional Prosedur Tingkat Kesehatan Bank Standard Operating Procedures for Bank Soundness Level
010/SK-DIR/01/21	29 Januari 2021 29 January 2021	Kebijakan Bea Materai Stamp Duty Policy
004/SK-DIR/02/21	18 Februari 2021 18 February 2021	Standar Operasional Prosedur Transaksi Valas <i>Remittance</i> Standard Operating Procedures for Remittance Forex Transactions
005/SK-DIR/02/21	26 Februari 2021 26 February 2021	<i>Standard Operating Procedures and Policies</i> Penanganan Kredit Bermasalah Standard Operating Procedures and Policies for Handling Non-Performing Loans
005/SK-DIR/03/21	17 Maret 2021 17 March 2021	Kebijakan Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme Anti Money Laundering and Counter-Terrorism Financing Policy
006/SK-DIR/03/21	17 Maret 2021 17 March 2021	Standar Operasional Prosedur Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme Standard Operating Procedures for Anti Money Laundering and Counter-Terrorism Financing
010/SK-DIR/03/21	19 Maret 2021 19 March 2021	Standard Operating Procedures and Policies Consumer Banking
011/SK-DIR/03/21	19 Maret 2021 19 March 2021	<i>Standard Operating Procedures and Policies</i> Penanganan Kredit Bermasalah Standard Operating Procedures and Policies for Handling Non-Performing Loans

No. Surat Letter No.	Tanggal Date	Keputusan Decisions
012/SK-DIR/03/21	19 Maret 2021 19 March 2021	Standard Operating Procedures and Policies Multifinance
013/SK-DIR/03/21	19 Maret 2021 19 March 2021	<i>Standard Operating Procedures and Policies</i> Segmentasi Kredit Standard Operating Procedures and Policies for Loan Segmentation
014/SK-DIR/03/21	22 Maret 2021 22 March 2021	Kebijakan Transparansi dan Publikasi Laporan Bank (Permodalan) Policy of Transparency and Publication of Bank Reports (Capital)
015/SK-DIR/03/21	29 Maret 2021 29 March 2021	Kebijakan Laporan Publikasi Ekspose Risiko Risk Exposure Publication Report Policy
019/SK-DIR/03/21	29 Maret 2021 29 March 2021	Kebijakan Penerapan Tata Kelola dan Pelaporan dalam Pemberian Remunerisasi Policy of Implementation of Governance and Reporting in Providing Remuneration
010/SK-DIR/04/21	22 April 2021	Kebijakan <i>Assets and Liability Management</i> (ALMA) Assets and Liability Management (ALMA) Policy
028/SK-DIR/04/21	30 April 2021	Kebijakan Perlindungan Konsumen Bank Indonesia Bank Indonesia Consumer Protection Policy
029/SK-DIR/04/21	30 April 2021	Pedoman Aktivitas Fungsional Operasional di Risiko Operasional ( <i>Risk Register</i> ) Guidelines for Operational Functional Activities in Operational Risk (Risk Register)
004/SK-DIR/05/21	21 Mei 2021 21 May 2021	Kebijakan <i>Liquidity Contingency Plan</i> (LCP) Liquidity Contingency Plan (LCP) Policy
006/SK-DIR/05/21	31 Mei 2021 31 May 2021	Standar Operasional Prosedur Rencana Bisnis Bank (RBB) ( <i>Back Date</i> ) Standard Operating Procedures for Bank Business Plan (RBB) (Back Date)
002/SK-DIR/06/21	16 Juni 2021 16 June 2021	Kebijakan <i>Cancel, Delete, dan Sanksi</i> bagi <i>Dealer Treasury</i> Cancel, Delete, and Sanctions Policy for Treasury Dealers
001/SK-DIR/07/21	23 Juli 2021 23 July 2021	Kebijakan Agen Penjual Efek Reksa Dana (APERD) Mutual Fund Selling Agent (APERD) Policy
002/SK-DIR/07/21	23 Juli 2021 23 July 2021	Standar Operasional Prosedur Agen Penjual Efek Reksa Dana (APERD) Standard Operating Procedures for Mutual Fund Selling Agent (APERD)
003/SK-DIR/07/21	28 Juli 2021 28 July 2021	Standar Operasional Prosedur Penilaian Agunan ( <i>Appraisal</i> ) Standard Operating Procedures for Collateral Valuation (Appraisal)
002/SK-DIR/08/21	20 Agustus 2021 20 August 2021	Kebijakan dan Tata Tertib Kerja Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria Policies and Code of Conduct of Integrated Risk Management in Victoria Financial Group
003/SK-DIR/08/21	20 Agustus 2021 20 August 2021	Kebijakan dan Pedoman Umum Manajemen Risiko Grup Keuangan Victoria Risk Management's Policies and General Guidelines of Victoria Financial Group
001/SK-DIR/10/21	1 Oktober 2021 1 October 2021	Kebijakan <i>Liquidity Contingency Plan</i> (LCP) Liquidity Contingency Plan (LCP) Policy
002/SK-DIR/10/21	1 Oktober 2021 1 October 2021	Standar Operasional Prosedur Penilaian Profil Risiko Standard Operating Procedures for Risk Profile Assessment
004/SK-DIR/10/21	5 Oktober 2021 5 October 2021	Standar Operasional Prosedur Perkreditan <i>Multifinance</i> Standard Operating Procedures for Multifinance Loans
008/SK-DIR/10/21	26 Oktober 2021 26 October 2021	<i>Standard Operating Procedures and Policies</i> Penanganan Kredit Bermasalah Standard Operating Procedures and Policies for Handling Non-Performing Loans
010/SK-DIR/10/21	29 Oktober 2021 29 October 2021	Kebijakan <i>Wealth Management</i> (Reksa Dana) ( <i>Back Date</i> ) Wealth Management Policies (Mutual Funds) (Back Date)
011/SK-DIR/10/21	29 Oktober 2021 29 October 2021	Standar Operasional Prosedur <i>Wealth Management</i> (Reksa Dana) ( <i>Back Date</i> ) Standard Operating Procedures for Wealth Management (Mutual Funds) (Back Date)
012/SK-DIR/10/21	29 Oktober 2021 29 October 2021	Kebijakan Agen Penjual Efek Reksa Dana (APERD) dan Wakil Agen Penjual Efek Reksa Dana (WAPERD) ( <i>Back Date</i> ) Policies of Mutual Funds Selling Agent (APERD) and Mutual Funds Selling Agent Representative (WAPERD) (Back Date)
013/SK-DIR/10/21	29 Oktober 2021 29 October 2021	Standar Operasional Prosedur Agen Penjual Efek Reksa Dana (APERD) dan Wakil Agen Penjual Efek Reksa Dana (WAPERD) ( <i>Back Date</i> ) Standard Operating Procedures for Mutual Fund Selling Agent (APERD) and Mutual Fund Selling Agent Representative (WAPERD) (Back Date)
001/SK-DIR/11/21	3 November 2021	<i>Standard Operating Procedures and Policies</i> Kredit Jaminan Tunai ( <i>Back-to-Back</i> 100%) Standard Operating Procedures and Policies for Cash Guarantee Credit (Back-to-Back 100%)
002/SK-DIR/11/21	8 November 2021	Standard Operating Procedures and Policies Corporate, Commercial and Small Medium Enterprise
003/SK-DIR/11/21	8 November 2021	Standar Operasional Prosedur Penilaian Agunan ( <i>Appraisal</i> ) Standard Operating Procedures for Collateral Valuation (Appraisal)



No. Surat Letter No.	Tanggal Date	Keputusan Decisions
004/SK-DIR/11/21	8 November 2021	<i>Standard Operating Procedures and Policies Skim Pembiayaan Small Medium Enterprise dengan Fintech</i> Standard Operating Procedures and Policies for Financing Scheme for Small Medium Enterprises with Fintech
005/SK-DIR/11/21	12 November 2021	Kebijakan Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme Anti Money Laundering and Counter-Terrorism Financing Policy
006/SK-DIR/11/21	12 November 2021	Standar Operasional Prosedur Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme Standard Operating Procedures for Anti Money Laundering and Counter-Terrorism Financing
007/SK-DIR/11/21	12 November 2021	Pedoman Perkiraan Pembukuan <i>Chart of Account (COA)</i> Chart of Accounts (COA) Bookkeeping Estimate Guidelines
009/SK-DIR/11/21	19 November 2021	Standar Operasional Prosedur Tata Kelola Pembukuan dan Pemantauan Persediaan <i>Voucher</i> atau Barang Hadiah Lainnya Standard Operating Procedures for Bookkeeping and Monitoring Inventory of Vouchers or Other Gift Items
010/SK-DIR/11/21	22 November 2021	Kebijakan Bank Persepsi Perception Bank Policies
011/SK-DIR/11/21	22 November 2021	Standar Operasional Prosedur Bank Persepsi Standard Operating Procedures for Perception Bank
012/SK-DIR/11/21	23 November 2021	Kebijakan Rekening Tabungan Savings Account Policies
013/SK-DIR/11/21	23 November 2021	Standar Operasional Prosedur Rekening Tabungan Standard Operating Procedures for Savings Account
014/SK-DIR/11/21	23 November 2021	Kebijakan Rekening Tabungan V-Bisnis V-Bisnis Savings Account Policies
015/SK-DIR/11/21	23 November 2021	Standar Operasional Prosedur Rekening Tabungan V-Bisnis Standard Operating Procedures for V-Business Savings Account
016/SK-DIR/11/21	23 November 2021	Kebijakan Rekening Tabungan V-Jun V-Jun Savings Account Policies
017/SK-DIR/11/21	23 November 2021	Standar Operasional Prosedur Rekening Tabungan V-Jun Standard Operating Procedure for V-Jun Savings Account
018/SK-DIR/11/21	23 November 2021	Kebijakan <i>Liquidity Contingency Plan (LCP)</i> Liquidity Contingency Plan (LCP) Policy
020/SK-DIR/11/21	23 November 2021	Kebijakan Rekening TabunganKu TabunganKu Account Policies
021/SK-DIR/11/21	23 November 2021	Standar Operasional Prosedur Rekening TabunganKu Standard Operating Procedures for TabunganKu Account
022/SK-DIR/11/21	25 November 2021	Standar Operasional Prosedur Laporan <i>Branch Performance</i> Standard Operating Procedures for Branch Performance Report
026/SK-DIR/11/21	30 November 2021	Kebijakan Pengamanan Jaringan Komunikasi Communication Network Security Policies
028/SK-DIR/11/21	30 November 2021	Kebijakan Pengelolaan Hubungan dengan Pihak Penyedia Jasa Policy on Managing Relationships with Service Providers
029/SK-DIR/11/21	30 November 2021	Kebijakan CKPN Sesuai PSAK 71 Allowance for Impairment Losses (CKPN) Policies According to PSAK 71
030/SK-DIR/11/21	30 November 2021	Kebijakan Sewa Sesuai PSAK 73 Lease Policies According to PSAK 73
003/SK-DIR/12/21	13 Desember 2021 13 December 2021	Kebijakan dan Prosedur Kustodian Custodian Policies and Procedures
004/SK-DIR/12/21	15 Desember 2021 15 December 2021	Kebijakan Rekening Tagihan, Uang Muka, dan Rekening <i>Sundries</i> Billing, Advance, and Sundries Account Policies
009/SK-DIR/12/21	30 Desember 2021 30 December 2021	Standar Operasional Prosedur Penilaian Profil Risiko Standard Operating Procedures for Risk Profile Assessment
010/SK-DIR/12/21	30 Desember 2021 30 December 2021	Kebijakan dan Prosedur Penanganan Penggunaan <i>Power User</i> Policies and Procedures for Handling the Use of Power Users
011/SK-DIR/12/21	30 Desember 2021 30 December 2021	Standar Operasional Prosedur Tingkat Kesehatan Bank Standard Operating Procedures for Bank Soundness Level
012/SK-DIR/12/21	30 Desember 2021 30 December 2021	Standar Operasional Prosedur <i>Business Continuity Management (BCM)</i> Standard Operating Procedures for Business Continuity Management (BCM)

No. Surat Letter No.	Tanggal Date	Keputusan Decisions
<b>Kajian Produk</b> Product Review		
001/COMP-CMO/05/2021	3 Mei 2021 3 May 2021	<i>Electronic Document (E-Doc)</i> Electronic Document (E-Doc)
002/COMP-PD/05/2021	10 Mei 2021 10 May 2021	<i>Pengembangan/Revamp Internet dan Mobile Banking</i> Development/Revamp of Internet and Mobile Banking
01/COMP-LWP/BCR/06/2021	7 Juni 2021 7 June 2021	<i>Perjanjian Kerja Sama Bancassurance Allianz Wealthlink Preferred Life antara PT Bank Victoria International Tbk dengan PT Allianz Life Indonesia</i> Cooperation Agreement of Bancassurance Allianz Wealthlink Preferred Life between PT Bank Victoria International Tbk and PT Allianz Life Indonesia
02/COMP-LWP/BCR/06/2021	7 Juni 2021 7 June 2021	<i>Perjanjian Kerja Sama Bancassurance Allianz Assetlink Maxima antara PT Bank Victoria International Tbk dengan PT Allianz Life Indonesia</i> Cooperation Agreement of Bancassurance Allianz Assetlink Maxima between PT Bank Victoria International Tbk and PT Allianz Life Indonesia
03/COMP-LWP/BCR/06/2021	7 Juni 2021 7 June 2021	<i>Perjanjian Kerja Sama Bancassurance Allianz Life Secure PASTI antara PT Bank Victoria International Tbk dengan PT Allianz Life Indonesia</i> Cooperation Agreement of Bancassurance Allianz Life Secure PASTI between PT Bank Victoria International Tbk and PT Allianz Life Indonesia
04/COMP-LWP/BCR/06/2021	30 Juni 2021 30 June 2021	<i>Kerja Sama Pemasaran Reksadana Proteksi 6 antara PT Bank Victoria International Tbk dengan PT Setiabudi Investment Management</i> Marketing Cooperation of Proteksi 6 Mutual Funds between PT Bank Victoria International Tbk and PT Setiabudi Investment Management
05/COMP-LWP/BCR/06/2021	30 Juni 2021 30 June 2021	<i>Perjanjian Kerja Sama Reksadana antara PT Bank Victoria dengan PT Trimegah Mutual Funds Cooperation Agreement between PT Bank Victoria and PT Trimegah</i>
01/COMP-PD/07/2021	8 Juli 2021 8 July 2021	<i>Pengembangan Layanan Aktivitas atau Produk Baru "Quick Response Indonesian Standard (QRIS)"</i> Development of New Activity Services or Products "Quick Response Indonesian Standard (QRIS)"
02/COMP-PD/07/2021	16 Juli 2021 16 July 2021	<i>Kerja Sama Aktivitas Baru dengan Victoria Manajemen Investasi untuk Lancar Merkurius</i> Cooperation of New Activity with Victoria Investment Management for Lancar Merkurius
01/COMP-LWP/RD/08/2021	20 Agustus 2021 20 August 2021	<i>Kajian Kerja Sama Reksadana Produk "Batavia Dana Obligasi Ultima" antara PT Bank Victoria International Tbk dengan PT Batavia Prosperindo Aset Manajemen</i> Review of Mutual Funds Cooperation for "Batavia Dana Obligasi Ultima" between PT Bank Victoria International Tbk and PT Batavia Prosperindo Aset Manajemen
02/COMP-LWP/RD/08/2021	20 Agustus 2021 20 August 2021	<i>Kajian Kerjasama Reksadana Produk "Batavia Dana Saham" antara PT Bank Victoria International Tbk dengan PT Batavia Prosperindo Aset Manajemen</i> Review of Mutual Funds Cooperation for "Batavia Dana Saham" between PT Bank Victoria International Tbk and PT Batavia Prosperindo Aset Manajemen
03/COMP-LWP/RD/08/2021	20 Agustus 2021 20 August 2021	<i>Kajian Kerja Sama Bancassurance Produk "Batavia Dana Saham Optimal" antara PT Bank Victoria International Tbk dengan PT Batavia Prosperindo Aset Manajemen</i> Review of Bancassurance Cooperation for "Batavia Dana Saham Optimal" between PT Bank Victoria International Tbk and PT Batavia Prosperindo Aset Manajemen
04/COMP-LWP/RD/08/2021	20 Agustus 2021 20 August 2021	<i>Kajian Kerja Sama Reksadana Produk "Batavia USD Balanced Asia" antara PT Bank Victoria International Tbk dengan PT Batavia Prosperindo Aset Manajemen</i> Review of Mutual Funds Cooperation for "Batavia USD Balanced Asia" between PT Bank Victoria International Tbk and PT Batavia Prosperindo Aset Manajemen
05/COMP-LWP/RD/08/2021	20 Agustus 2021 20 August 2021	<i>Kajian Kerja Sama Reksadana Produk "Batavia Global ESG Sharia Equity USD" antara PT Bank Victoria International Tbk dengan PT Batavia Prosperindo Aset Manajemen</i> Review of Mutual Funds Cooperation for "Batavia Global ESG Sharia Equity USD" between PT Bank Victoria International Tbk and PT Batavia Prosperindo Aset Manajemen
06/COMP-ECDB/RD/08/2021	26 Agustus 2021 26 August 2021	<i>Kajian Aktivitas Pengembangan Onboarding</i> Review of Onboarding Development Activities
01/COMP-ECDB/RD/10/2021	7 Oktober 2021 7 October 2021	<i>Kajian Pengembangan Layanan Aktivitas atau Produk Baru "Fitur Tarik Tunai Tanpa Kartu (Cardless Withdrawal)"</i> Review of New Activities or Product Services Development of "Cardless Withdrawal Feature"

## Sertifikasi Manajemen Risiko Direksi

Pada tahun 2021, Direksi telah mengikuti sertifikasi manajemen risiko. Informasi terkait sertifikasi tersebut diungkapkan pada tabel di bawah ini.

## Board of Directors' Risk Management Certifications

In 2021, the Board of Directors participated in risk management. Information related to such certification is disclosed in the table below.

Nama Name	Jabatan Position	Level	Waktu Time	Masa Berlaku Validity Period	Penyelenggara Organizer
Ahmad Fajar	Direktur Utama President Director	5	12 Januari 2021 12 January 2021	26 April 2023	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Rusli	Wakil Direktur Utama Deputy President Director	5	12 Januari 2021 12 January 2021	3 Mei 2023 3 May 2023	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Lembing	Direktur Director	5	15 September 2020	2 Juni 2022 2 June 2022	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Debora Wahjutirto Tanoyo	Direktur Director	5	15 September 2020	26 Mei 2022 26 May 2022	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	5	30 September 2021	7 September 2023	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution

## Penilaian Kinerja Direksi

### Prosedur dan Kriteria Penilaian Kinerja Direksi

Sebagai bagian dari implementasi GCG, Direksi wajib dievaluasi kinerjanya paling sedikit 1 (satu) kali dalam 1 (satu) tahun. Evaluasi kinerja Direksi dilakukan melalui penilaian sendiri dan oleh Dewan Komisaris.

#### 1. Penilaian Sendiri Direksi

Pelaksanaan penilaian sendiri terkait Direksi dikoordinir oleh Divisi *Compliance/Integrated, AML & System Procedure* serta mengacu pada Peraturan Otoritas Jasa Keuangan tentang Penerapan Tata Kelola bagi Bank Umum. Berdasarkan peraturan tersebut, Bank wajib melaksanakan penilaian sendiri implementasi GCG dengan salah satu faktor penilaian adalah pelaksanaan tugas dan tanggung jawab Direksi. Faktor penilaian terkait Direksi tersebut mencakup 16 indikator *governance structure*, 14 indikator *governance process*, dan 10 (sepuluh) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola Bagi Bank Umum. Hasil penilaian sendiri Direksi tersebut dilaporkan kepada Dewan Komisaris dan Direksi.

## Board of Directors' Performance Assessment

### Procedure and Criteria of the Board of Directors' Performance Assessment

As part of GCG implementation, the Board of Directors' performance must be evaluated at least once every year. Evaluation of the Board of Directors' performance is carried out by self-assessment and by the Board of Commissioners.

#### 1. Board of Directors' Self-Assessment

The implementation of Board of Directors' self-assessment is coordinated by the Compliance/Integrated, AML & System Procedure Division and refers to the Financial Services Authority Regulation on Implementation of Governance for Commercial Banks. Pursuant to the above regulations, it is mandatory for the Bank to conduct self-assessment on GCG implementation with the implementation of Board of Directors' duties and responsibilities being one of the factors being assessed. The Board of Directors' assessment factors include 16 indicators of governance structure, 14 indicators of governance process, and 10 (ten) indicators of governance outcome as regulated in Appendix III to Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks. The Board of Directors' self-assessment result is then reported to the Board of Commissioners and Board of Directors.

**Pada tahun 2021, hasil penilaian sendiri Direksi memperoleh nilai komposit "2 (dua)" dengan kategori "Baik".**  
**In 2021, the Board of Directors' self assessment result obtained a composite score of "2 (two)" under the category of "Good".**

Keterangan lebih lanjut mengenai hasil penilaian sendiri Direksi telah dijelaskan pada bagian Penilaian GCG.

Further information regarding Board of Directors' self-assessment is explained in the GCG Assessment section.

## 2. Penilaian Kinerja Direksi oleh Dewan Komisaris

Prosedur penilaian kinerja Direksi oleh Dewan Komisaris meliputi:

- Direksi menyusun KPI yang memuat rencana kerja, sasaran atau target yang akan dicapai dalam 1 (satu) tahun maupun triwulan;
- Penilaian kinerja Direksi dilaksanakan oleh Dewan Komisaris, namun Direktur Utama dapat menilai Direksi lainnya;
- Direksi melaporkan realisasi pencapaian target masing-masing KPI dalam laporan triwulan dan Laporan Tahunan kepada Dewan Komisaris, baik secara individu maupun kolektif untuk dievaluasi; serta
- Hasil evaluasi KPI Direksi oleh Dewan Komisaris menjadi bahan penilaian pertanggungjawaban Direksi dalam pelaksanaan RUPS.

Adapun kriteria yang digunakan dalam penilaian kinerja tersebut meliputi:

- Terlaksananya kepemimpinan (*leadership*), kerja sama (*team work*), serta komunikasi dan kompetensi yang baik;
- Terlaksananya GCG dalam setiap kegiatan usaha Bank;
- Terlaksananya pencapaian Rencana Bisnis Bank; dan
- Terlaksananya pengawasan atas tindak lanjut dari Direksi berdasarkan audit, rekomendasi SKAI, auditor eksternal, atau pengawasan Otoritas Jasa Keuangan.

Penilaian kinerja tersebut diukur berdasarkan nilai, yaitu:

- Nilai 4 (empat) = kinerja luar biasa;
- Nilai 3 (tiga) = kinerja baik;
- Nilai 2 (dua) = kinerja cukup; dan
- Nilai 1 (satu) = kinerja kurang.

## 2. Board of Directors' Performance Assessment by the Board of Commissioners

Procedures of Board of Directors' performance assessment by the Board of Commissioners include:

- The Board of Directors prepares KPI that includes work plan, objectives, or goals to be achieved within 1 (one) year and quarterly;
- The Board of Directors' performance is assessed by the Board of Commissioners, but the President Director can assess other Directors;
- The Board of Directors reports the realization of target achievement for each KPI in the quarterly report and Annual Report to the Board of Commissioners, whether individually or collectively, to be evaluated; and
- The evaluation result of Board of Directors' KPI by the Board of Commissioners becomes means in assessing the Board of Directors' accountability in the GMS.

Criteria used in assessing the performance among others are:

- The implementation of good leadership, teamwork, communication and competency;
- The implementation of GCG process in each of the Bank's business activities;
- The achievement of the Bank's Business Plan;
- The implementation of monitoring and follow-up from the Board of Directors based on audit, recommendation of SKAI, external auditor or the Financial Services Authority's supervision.

The performance assessment is measured based on the following scores:

- Score 4 (four) = excellent performance;
- Score 3 (three) = good performance;
- Score 2 (dua) = adequate performance; and
- Score 1 (one) = poor performance.

**Pada tahun 2021, hasil penilaian kinerja Direksi oleh Dewan Komisaris memperoleh nilai komposit "2 (dua)" dengan kategori "Baik". Hal tersebut menunjukkan setiap anggota Direksi telah melaksanakan tugas dan tanggung jawabnya dengan baik dan sesuai dengan BOD Charter dan peraturan perundang-undangan yang berlaku.**

**In 2021, the peer evaluation of implementation of Board of Commissioners' duties obtained a composite score of "2 (two)" under the category of "Good". This shows that each member of the Board of Directors has performed the duties and responsibilities properly and in accordance with the BOD Charter and the prevailing laws and regulations.**

Hasil penilaian kinerja tahun 2021 menunjukkan bahwa Direksi telah menjalankan tugas dan tanggung jawabnya dengan baik sesuai dengan prosedur dan kriteria penilaian. Hasil penilaian kinerja tersebut dijadikan dasar dalam pemberian remunerasi jangka pendek maupun jangka panjang.

The 2021 performance assessment result shows that the Board of Directors performed the duties and responsibilities appropriately according to the assessment procedure and criteria. The performance assessment result is used as a basis in providing short-term and long-term remuneration.

## Penilaian Kinerja Komite dan Organ Pendukung Direksi

### Prosedur Penilaian Kinerja Komite dan Organ Pendukung Direksi

Penilaian kinerja Komite di Bawah Direksi dievaluasi secara individual maupun secara kolektif setiap 1 (satu) tahun dengan menggunakan metode evaluasi dalam suatu sistem yang ditetapkan dalam keputusan Direksi. Penilaian kinerja tersebut dilakukan oleh Direksi.

### Kriteria dan Hasil Penilaian Kinerja Komite dan Organ Pendukung Direksi

Hasil penilaian kinerja Direksi terhadap Komite dan organ pendukung Direksi sepanjang tahun 2021 dijelaskan pada tabel berikut.

## Performance Assessment of Board of Directors' Supporting Committees and Organs

### Performance Assessment Procedure of the Board of Directors' Supporting Committees and Organs

Performance of the Committees under the Board of Directors is evaluated both individually and collectively once every year by using evaluation method in a system established under the Board of Directors' decision. Such performance assessment is conducted by the Board of Directors.

### Performance Assessment Criteria and Results of the Board of Directors' Supporting Committees

The performance assessment results of the Board of Directors' Supporting Committees and organs throughout 2021 are described hereinbelow.

Komite Pendukung Direksi Board of Directors' Supporting Committees	Dasar Penilaian Basis of Assessment	Hasil Penilaian Assessment Results
Komite Manajemen Risiko Risk Management Committee	<ol style="list-style-type: none"> <li>1. Kehadiran dalam rapat Komite;</li> <li>2. Penguasaan materi yang akan dibahas;</li> <li>3. Kesediaan menyediakan waktu dan upaya dalam memenuhi tugas dan tanggung jawab sebagai anggota Komite;</li> <li>4. Kesediaan berpartisipasi dalam kegiatan di luar kantor, seperti kunjungan ke unit bisnis;</li> <li>5. Kualitas dan saran yang diberikan dalam rapat-rapat;</li> <li>6. Terlaksananya pemantauan dan evaluasi, baik secara berkala maupun tahunan, atas hal-hal yang menjadi bidang tugas dan tanggung jawab masing-masing Komite;</li> <li>7. Pemantauan dan koreksi penyimpangan; serta</li> <li>8. Terlaksananya pemantauan dan evaluasi terhadap divisi/unit yang terkait dengan bidang tugas dan tanggung jawab masing-masing Komite.</li> </ol>	<p>Pada tahun 2021, Komite Manajemen Risiko telah melaksanakan tugas dan tanggung jawabnya dengan baik. Hal ini terlihat pada saat membantu Direksi menyusun kebijakan manajemen risiko serta perubahannya dan menyempurnakan proses manajemen risiko secara berkala.</p> <p>In 2021, the Risk Management Committee performed its duties and responsibilities well. This is reflected in its assistance to the Board of Directors in preparing the risk management policies, amending and improving the risk management process on a regular basis.</p>
Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Integrated Risk Management Committee in the Financial Group	<ol style="list-style-type: none"> <li>1. Attendance in Committee's meetings;</li> <li>2. Mastering materials to be discussed;</li> <li>3. Willingness to allocate time and efforts in fulfilling duties and responsibilities as member of the Committees;</li> <li>4. Willingness to participate in out of office activities, such as visit to business unit;</li> <li>5. Quality advice given in the meetings;</li> <li>6. Implementation of monitoring and evaluation, whether periodically or annually, of matters that become the duties and responsibilities of each Committee;</li> <li>7. Monitoring and correction of deviations; and</li> <li>8. Implementation of monitoring and evaluation on the division/work unit related to the duties and responsibilities of each Committee.</li> </ol>	<p>Direksi Entitas Koordinator memandang bahwa kinerja Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan selama tahun 2021 telah berjalan dengan baik dalam merumuskan kebijakan, menyempurnakan pelaksanaan kebijakan, mengevaluasi perkembangan, serta memberikan saran dan langkah perbaikan untuk Grup Keuangan Victoria.</p> <p>The Board of Directors of Coordinator Entity views that the Integrated Risk Management Committee in the Financial Group had performed well throughout 2021 in formulating policies, refining the implementation of policies, evaluating the development, and giving advises and corrective actions for Victoria Financial Group.</p>
Assets and Liabilities Committee	<ol style="list-style-type: none"> <li>1. Attendance in Committee's meetings;</li> <li>2. Mastering materials to be discussed;</li> <li>3. Willingness to allocate time and efforts in fulfilling duties and responsibilities as member of the Committees;</li> <li>4. Willingness to participate in out of office activities, such as visit to business unit;</li> <li>5. Quality advice given in the meetings;</li> <li>6. Implementation of monitoring and evaluation, whether periodically or annually, of matters that become the duties and responsibilities of each Committee;</li> <li>7. Monitoring and correction of deviations; and</li> <li>8. Implementation of monitoring and evaluation on the division/work unit related to the duties and responsibilities of each Committee.</li> </ol>	<p>Direksi memandang kinerja <i>Assets and Liabilities Committee</i> selama tahun 2021 baik, hal tersebut tercermin dalam analisa dan evaluasi pengelolaan aset dan liabilitas, serta pengambilan keputusan melalui perumusan kebijakan, strategi, dan sasaran untuk mengelola aset dan liabilitas Bank secara terintegrasi.</p> <p>The Board of Directors views that the <i>Assets and Liabilities Committee</i> had performed well throughout 2021. This was shown in the analysis and evaluation of assets and liabilities management and the decision-making through formulation of policy, strategy, and target to manage the Bank's assets and liabilities in an integrated manner.</p>
Komite Kredit Credit Committee	<ol style="list-style-type: none"> <li>1. Attendance in Committee's meetings;</li> <li>2. Mastering materials to be discussed;</li> <li>3. Willingness to allocate time and efforts in fulfilling duties and responsibilities as member of the Committees;</li> <li>4. Willingness to participate in out of office activities, such as visit to business unit;</li> <li>5. Quality advice given in the meetings;</li> <li>6. Implementation of monitoring and evaluation, whether periodically or annually, of matters that become the duties and responsibilities of each Committee;</li> <li>7. Monitoring and correction of deviations; and</li> <li>8. Implementation of monitoring and evaluation on the division/work unit related to the duties and responsibilities of each Committee.</li> </ol>	<p>Sepanjang tahun 2021, Direksi menilai Komite Kredit telah menjalankan tugas dan tanggung jawabnya dengan baik. Komite Kredit telah melakukan rapat Komite yang membahas terkait klien korporasi, klien komersial, klien <i>Small Medium Enterprises</i> (SME), klien konsumen, klien <i>Financial Institution</i>, klien perusahaan pembiayaan, dan klien <i>Special Asset Management</i>.</p> <p>Throughout 2021, the Board of Directors evaluated that the Credit Committee performed its duties and responsibilities properly. The Credit Committee held meetings that discussed matters related to corporate clients, commercial clients, Small Medium Enterprises (SME) clients, consumer clients, Financial Institution clients, financing company clients, and Special Asset Management clients.</p>

<b>Komite Pendukung Direksi</b> <b>Board of Directors’ Supporting Committees</b>	<b>Dasar Penilaian</b> <b>Basis of Assessment</b>	<b>Hasil Penilaian</b> <b>Assessment Results</b>
Komite Kebijakan Perkreditan Credit Policy Committee		<p>Sepanjang tahun 2021, Direksi menilai Komite Kebijakan Perkreditan telah menjalankan tugas dan tanggung jawabnya dengan baik. Hal tersebut tercermin dalam merumuskan kebijakan kredit, serta memberikan saran untuk perbaikan terkait kebijakan kredit.</p> <p>Throughout 2021, the Board of Directors evaluated that the Credit Policy Committee performed its duties and responsibilities properly. This was reflected in formulating credit policies, as well as providing suggestions for improvements related to credit policies.</p>
Komite Teknologi Informasi Information Technology Committee		<p>Direksi menilai Komite Teknologi Informasi telah menjalankan tugas dan tanggung jawabnya dengan baik selama tahun 2021. Hal tersebut ditunjukkan dengan membuat rencana strategis teknologi informasi (<i>information technology strategic plan</i>) yang sesuai dengan rencana strategis kegiatan usaha Bank.</p> <p>The Board of Directors considers that the Information Technology Committee performed its duties and responsibilities properly throughout 2021. This was demonstrated by preparing an information technology strategic plan in line with the strategic plan of the Bank’s business activities.</p>
Komite Pemantau dan Pelaksanaan GCG GCG Implementation and Monitoring		<p>Direksi memandang bahwa Komite Pemantau dan Pelaksanaan GCG selama tahun 2021 telah efektif dalam membantu Direksi melakukan pengawasan terhadap pelaksanaan GCG di Bank.</p> <p>The Board of Directors considers that the GCG Implementation and Monitoring Committee throughout 2021 had effectively assisted the Board of Directors in monitoring the GCG implementation in the Bank.</p>
Komite Personalia Personnel Committee		<p>Direksi memandang bahwa Komite Personalia selama tahun 2021 efektif membantu Direksi dalam merumuskan kebijakan, mengawasi pelaksanaan kebijakan, memantau perkembangan dan kondisi ketenagakerjaan, serta memberikan saran-saran dan langkah perbaikan yang sesuai dengan peraturan ketenagakerjaan di perbankan dan Undang-Undang Ketenagakerjaan yang berlaku di Indonesia.</p> <p>The Board of Directors views that the Personnel Committee throughout 2021 was effective in assisting the Board of Directors in formulating policies, overseeing the implementation of policies, monitoring labor development and condition, and providing suggestions and corrective measures in accordance with labor regulations in banking and the Manpower Law applicable in Indonesia.</p>
Komite Pengadaan Procurement Committee		<p>Sepanjang tahun 2021, Direksi menilai Komite Pengadaan telah menjalankan tugas dan tanggung jawabnya dengan baik. Hal tersebut dibuktikan dengan memberikan masukan untuk hal-hal yang penting dan relevan dalam perumusan kebijakan pengadaan barang dan jasa, serta memberikan persetujuan untuk setiap pengadaan barang dan jasa.</p> <p>Throughout 2021, the Board of Directors evaluated that the Procurement Committee performed its duties and responsibilities properly. This was evidenced by providing inputs for important and relevant matters in formulating policies of procurement of goods and services, and providing approval for every procurement of goods and services.</p>
Komite Produk Product Committee		<p>Kinerja Komite Produk selama tahun 2021 dipandang Direksi baik, hal tersebut dibuktikan dengan Komite Produk telah membantu Direksi dalam memberikan arahan kebijakan yang berkaitan dengan pengelolaan produk <i>liabilities</i> dan <i>wealth management</i> yang akan dan/atau telah diterbitkan agar produk tersebut mampu bersaing dengan bank lain dan menghasilkan keuntungan bagi Bank.</p> <p>The Product Committee was considered to have performed well by the Board of Directors throughout 2021. This was evidenced by the Product Committee having assisted the Board of Directors in providing policy-related directives related to the management of liabilities and wealth management products that will be and/or have been launched so that such products can compete with those of other banks and generate profits for the Bank.</p>
Komite Investasi Investment Committee		<p>Kinerja Investasi selama tahun 2021 dipandang Direksi baik, hal tersebut dibuktikan dengan Komite Investasi telah membantu Direksi dalam memberikan arahan kebijakan yang berkaitan dengan investasi.</p> <p>The Investment Committee was considered to have performed well by the Board of Directors throughout 2021. This was evidenced by having the Investment Committee assisted the Board of Directors in providing policy directives related to investment.</p>



## Pengunduran Diri dan Pemberhentian Direksi

Berdasarkan BOD *Charter*, seorang anggota Direksi berhak mengundurkan diri dari jabatannya dengan memberitahukan secara tertulis mengenai maksud tersebut kepada Bank paling lambat 30 hari sebelum tanggal pengunduran dirinya. Anggota Direksi yang mengundurkan diri tersebut tetap dapat dimintakan pertanggungjawabannya sejak pengangkatan sampai dengan tanggal pengunduran dirinya tersebut dalam RUPS berikutnya.

Selain itu, anggota Direksi berakhir jabatannya dengan sendirinya jika:

1. Meninggal dunia;
2. Dinyatakan pailit atau ditaruh di bawah pengampunan berdasarkan suatu putusan pengadilan;
3. Tidak lagi memenuhi persyaratan perundang-undangan yang berlaku, dengan memperhatikan peraturan di bidang pasar modal; dan
4. Berdasarkan keputusan RUPS.

## Resignation and Termination of the Board of Directors

Based on BOD Charter, a member of the Board of Directors is entitled to resign from his/her position by sending a written notification related to such intention to the Bank within no later than 30 days prior to the resignation date. The resigning member of the Board of Directors can still be held accountable for all actions taken effective from his/her appointment up to the day of his/her resignation in the subsequent GMS.

In addition, a member of Boards of Directors' term of office shall terminate in the event that such member is:

1. Deceased;
2. Declared bankrupt or under guardianship based on a court decision;
3. No longer meets the requirements of applicable laws and regulations, with due observance of regulations in capital market sector; and
4. Terminated based on the GMS resolution.

## Kebijakan Keberagaman Komposisi Dewan Komisaris dan Direksi

### Diversity Policy of the Board of Commissioners and Board of Directors' Composition

Keberagaman komposisi Dewan Komisaris dan Direksi merupakan salah satu upaya yang dilakukan Bank Victoria untuk menguatkan peran, fungsi, serta tugas Dewan Komisaris dan Direksi. Oleh karena itu, Bank Victoria telah menyusun Kebijakan Keberagaman Komposisi *Board of Commissioners and Board of Directors* PT Bank Victoria International Tbk yang telah disahkan melalui Surat Keputusan Dewan Komisaris No. 001/SK-KOM/012/20 tanggal 10 Januari 2020. Kebijakan keberagaman komposisi tersebut disusun mengacu pada Surat Edaran Otoritas Jasa Keuangan No. 32/SEOJK.04/2015 tentang Pedoman Tata Kelola Perusahaan Terbuka. Informasi terkait kebijakan keberagaman komposisi Dewan Komisaris dan Direksi Bank diuraikan sebagai berikut.

Diversity in the Board of Commissioners and Board of Directors' composition is one of Bank Victoria's efforts in strengthening the roles, functions, and duties of the Board of Commissioners and Board of Directors. As such, Bank Victoria established Diversity Policy of Composition of Board of Commissioners and Board of Directors of PT Bank Victoria International Tbk., which was approved under the Board of Commissioners' Decision Letter No. 001/SK-KOM/0212/20 dated 10 January 2020. Such Composition Diversity Policy was established by referring to the Financial Services Authority Circular No. 32/SEOJK.04/2015 on Guidelines of Governance for Public Companies. Information related to the Diversity Policy of Composition of the Board of Commissioners and Board of Directors of the Bank is described hereinbelow.



## Pencapaian Kebijakan Keberagaman Komposisi Dewan Komisaris dan Direksi

## Achievement of Diversity Policy of the Board of Commissioners and Board of Directors' Composition

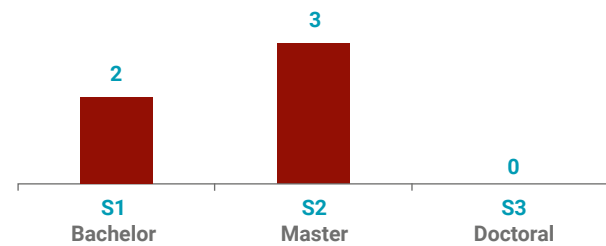
### Latar Belakang Pendidikan Dewan Komisaris dan Direksi

Board of Commissioners and Board of Directors' Educational Background

**Latar Belakang Pendidikan Dewan Komisaris**  
Board of Commissioners' Educational Background



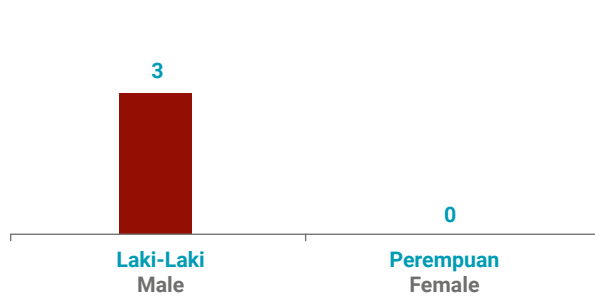
**Latar Belakang Pendidikan Direksi**  
Board of Directors' Educational Background



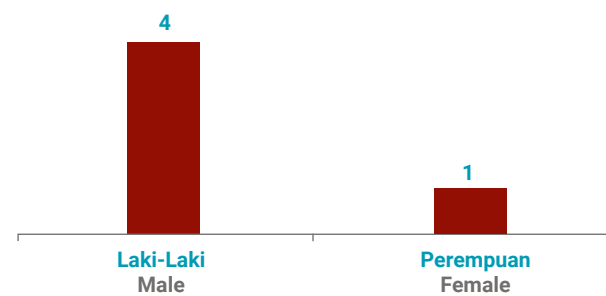
### Gender Dewan Komisaris dan Direksi

Board of Commissioners and Board of Directors' Gender

**Gender Dewan Komisaris**  
Board of Commissioners' Gender



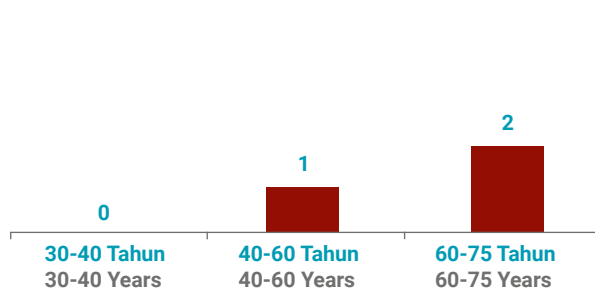
**Gender Direksi**  
Board of Directors' Gender



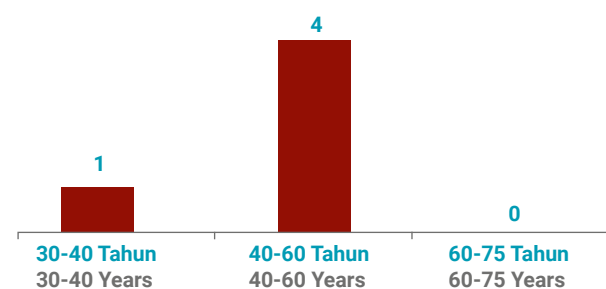
### Usia Dewan Komisaris dan Direksi

Board of Commissioners and Board of Directors' Age

**Usia Dewan Komisaris**  
Board of Commissioners' Age



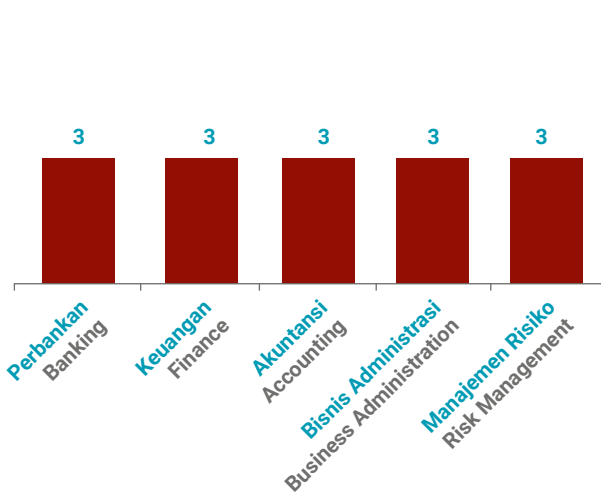
**Usia Direksi**  
Board of Directors' Age



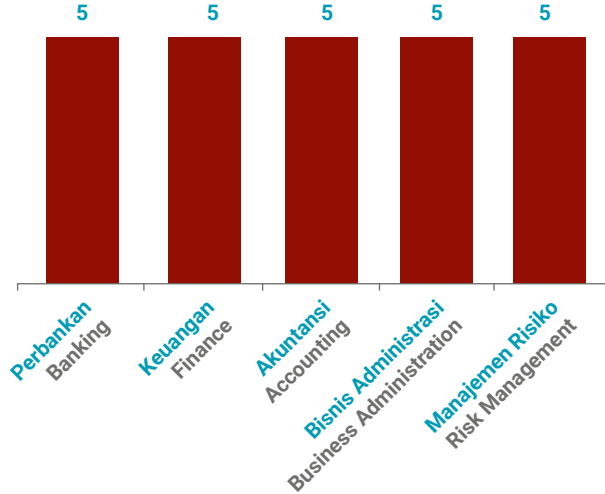
**Pengalaman Kerja Dewan Komisaris dan Direksi**

Board of Commissioners and Board of Directors' Work Experiences

**Pengalaman Kerja dan Keahlian Dewan Komisaris**  
Board of Commissioners' Work Experiences and Expertise



**Pengalaman Kerja dan Keahlian Direksi**  
Board of Directors' Work Experiences and Expertise



**Hubungan Afiliasi Dewan Komisaris dan Direksi**

Bank senantiasa memastikan Dewan Komisaris dan Direksi bertindak secara independen, dalam arti tidak mempunyai benturan kepentingan yang dapat mengganggu kemampuannya untuk melaksanakan tugas secara mandiri dan kritis, baik dalam hubungan satu sama lain maupun hubungan terhadap Dewan Komisaris dan/atau Direksi. Di samping itu, Bank memastikan hubungan afiliasi Dewan Komisaris dan Direksi dengan Pemegang Saham Utama dan/atau Pengendali baik secara langsung maupun tidak langsung.

**Affiliation Between Board of Commissioners and Board of Directors**

The Bank consistently ensures that the Board of Commissioners and Board of Directors act independently, and do not incur conflict of interest that may affect their credibility in performing their duties independently and critically, either relationship among themselves or relationship between the Board of Commissioners and/or Board of Directors. Furthermore, the Bank also pays attention to the affiliation between the Board of Commissioners and the Board of Directors, with the Main Shareholders and/or Controlling Shareholders, either directly or indirectly.

**Hubungan Keuangan**  
Financial Relationship

Nama Name	Jabatan Position	Dewan Komisaris Board of Commissioner			Direksi Board of Directors					Pemegang Saham Utama dan/atau Pengendali Main and/ or Controlling Shareholders		
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtito Tanoyo	Tamunan	Suzanna Tanojo	PT Victoria Investama Tbk	PT Gratamulia Pratama
Oliver Simorangkir	Komisaris Utama President Commissioner		x	x	x	x	x	x	x	x	x	x
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	x		x	x	x	x	x	x	x	x	x

Nama Name	Jabatan Position	Dewan Komisaris Board of Commissioner			Direksi Board of Directors					Pemegang Saham Utama dan/atau Pengendali Main and/ or Controlling Shareholders		
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan	Suzanna Tanojo	PT Victoria Investama Tbk	PT Gratamulia Pratama
Zaenal Abidin, PhD	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	x	x		x	x	x	x	x	x	x	x
Ahmad Fajar	Direktur Utama President Director	x	x	x		x	x	x	x	x	x	x
Rusli	Wakil Direktur Utama Deputy President Director	x	x	x	x		x	x	x	x	x	x
Lembing	Direktur Director	x	x	x	x	x		x	x	x	x	x
Debora Wahjutirto Tanoyo	Direktur Director	x	x	x	x	x	x		x	√	x	x
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	x	x	x	x	x	x	x		x	x	x

#### Hubungan Keluarga Family Relationship

Nama Name	Jabatan Position	Dewan Komisaris Board of Commissioner			Direksi Board of Directors					Pemegang Saham Utama dan/atau Pengendali Main and/ or Controlling Shareholders		
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan	Suzanna Tanojo	PT Victoria Investama Tbk	PT Gratamulia Pratama
Oliver Simorangkir	Komisaris Utama President Commissioner		x	x	x	x	x	x	x	x	x	x
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	x		x	x	x	x	x	x	x	x	x
Zaenal Abidin, PhD	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	x	x		x	x	x	x	x	x	x	x
Ahmad Fajar	Direktur Utama President Director	x	x	x		x	x	x	x	x	x	x
Rusli	Wakil Direktur Utama Deputy President Director	x	x	x	x		x	x	x	x	x	x
Lembing	Direktur Director	x	x	x	x	x		x	x	x	x	x

Nama Name	Jabatan Position	Dewan Komisaris Board of Commissioner			Direksi Board of Directors					Pemegang Saham Utama dan/atau Pengendali Main and/ or Controlling Shareholders		
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan	Suzanna Tanojo	PT Victoria Investama Tbk	PT Gratamulia Pratama
Debora Wahjutirto Tanoyo	Direktur Director	x	x	x	x	x	x		x	√	x	x
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	x	x	x	x	x	x	x		x	x	x

**Hubungan Kepengurusan  
Management Relationship**

Nama Name	Jabatan Position	Dewan Komisaris Board of Commissioner			Direksi Board of Directors					Pemegang Saham Utama dan/atau Pengendali Main and/ or Controlling Shareholders		
		Oliver Simorangkir	Gunawan Tenggarahardja	Zaenal Abidin, PhD	Ahmad Fajar	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan	Suzanna Tanojo	PT Victoria Investama Tbk	PT Gratamulia Pratama
Oliver Simorangkir	Komisaris Utama President Commissioner		x	x	x	x	x	x	x	x	x	x
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	x		x	x	x	x	x	x	x	x	x
Zaenal Abidin, PhD	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	x	x		x	x	x	x	x	x	x	x
Ahmad Fajar	Direktur Utama President Director	x	x	x		x	x	x	x	x	x	x
Rusli	Wakil Direktur Utama Deputy President Director	x	x	x	x		x	x	x	x	x	x
Lembing	Direktur Director	x	x	x	x	x		x	x	x	x	x
Debora Wahjutirto Tanoyo	Direktur Director	x	x	x	x	x	x		x	x	x	x
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	x	x	x	x	x	x	x		x	x	x

# Kebijakan Nominasi dan Remunerasi Dewan Komisaris dan Direksi

## Nomination and Remuneration Policy of the Board of Commissioners and Board of Directors

### Sistem Nominasi Dewan Komisaris dan Direksi

Berdasarkan Pedoman Komite Nominasi dan Remunerasi, Komite Nominasi dan Remunerasi bertugas untuk menyusun suatu sistem nominasi bagi anggota Dewan Komisaris dan Direksi Bank yang akan menjadi bagian dari Kebijakan *Good Corporate Governance* dari Bank serta akan menjadi pedoman bagi Dewan Komisaris dan RUPS dalam menetapkan nominasi dan remunerasi anggota Dewan Komisaris dan Direksi.

#### Prinsip Dasar

1. Calon anggota Dewan Komisaris dan Direksi harus memenuhi persyaratan yang ditentukan dalam Anggaran Dasar Bank Victoria dan peraturan perundang-undangan yang berlaku; serta
2. Pencalonan dan pengajuan calon Dewan Komisaris dan Direksi diajukan melalui seleksi dengan memperhatikan persyaratan tersebut di atas.

#### Prosedur Seleksi Selection Procedure

1

Komite Nominasi dan Remunerasi mengidentifikasi calon yang memenuhi kriteria  
The Nomination and Remuneration Committee identifies candidates who meet the criteria.

2

Dewan Komisaris atas dasar saran Komite Nominasi dan Remunerasi menyampaikan kepada Pemegang Saham.  
The Board of Commissioners based on recommendation from the Nomination and Remuneration Committee submits to the Shareholders.

3

Pelaksanaan seleksi dilaksanakan sebelum masa jabatan berakhir, diminta atau bila ada kekosongan Direksi.  
The selection process is carried out prior to the expiry of the existing term of office, or upon request or in case of any vacancy in the Board of Directors' position.

#### Persyaratan dan Kriteria

1. Yang dapat diangkat menjadi anggota Dewan Komisaris atau Direksi adalah perseorangan yang mampu melaksanakan perbuatan hukum dan tidak pernah dinyatakan pailit atau tidak pernah menjadi anggota Dewan Komisaris atau Direksi yang dinyatakan bersalah menyebabkan suatu pidana yang merugikan keuangan negara dalam waktu 5 (lima) tahun sebelum pengangkatannya, dengan memperhatikan peraturan perundang-undangan yang berlaku;

### Board of Commissioners and Board of Directors' Nomination System

Based on Nomination and Remuneration Committee's Charter, the Nomination and Remuneration Committee has the duty to establish a nomination system for the Bank's members of Board of Commissioners and Board of Directors which will become part of the Bank's Good Corporate Governance Policy, and will be used as a guideline for the Board of Commissioners and the GMS to determine the nomination and remuneration of the members of the Board of Commissioners and Board of Directors.

#### Basic Principles

1. Candidates of the Board of Commissioners and Board of Directors' members must meet the qualifications set out in Bank Victoria's Articles of Association and the prevailing laws and regulations; and
2. The nomination and recommendation of candidates for Board of Commissioners and Board of Directors' members must be made through a selection process and subject to the above qualification requirements.

#### Requirements and Criteria

1. Those who can be appointed as members of Board of Commissioners or Board of Directors are individuals who are able to perform legal acts and have never been declared bankrupt or become a member of Board of Commissioners or Board of Directors who is found guilty of committing a criminal act that is detrimental to state finances within 5 (five) years before being appointed, with due observance of the applicable laws and regulations;

2. Tidak mempunyai hubungan keluarga sedarah sampai derajat ketiga, baik menurut garis lurus maupun garis ke samping, atau hubungan semenda (menantu dan ipar) dengan anggota Dewan Komisaris atau Direksi lain;
3. Tidak termasuk dalam daftar orang tercela di bidang perbankan sesuai dengan yang ditetapkan oleh otoritas pengawasan bank;
4. Memiliki integritas yang baik, dalam arti:
  - a. Memiliki akhlak dan moral yang baik;
  - b. Mematuhi peraturan perundang-undangan yang berlaku;
  - c. Memiliki komitmen yang tinggi terhadap pengembangan operasional Bank yang sehat;
  - d. Dinilai layak dan wajar untuk menjadi anggota Dewan Komisaris atau Direksi Bank.
5. Penilaian integritas dilakukan dengan mengevaluasi calon, dalam arti tidak pernah melakukan hal-hal tersebut di bawah ini:
  - a. Rekyasa dan praktik-praktik perbankan yang menyimpang dari ketentuan perbankan;
  - b. Perbuatan yang dikategorikan tidak memenuhi komitmen yang telah disepakati dengan Bank Indonesia dan/atau pemerintah;
  - c. Perbuatan yang dikategorikan memberikan keuntungan kepada pemilik, pengurus, karyawan, dan/atau pihak lainnya yang dapat merugikan atau mengurangi keuntungan Bank;
  - d. Perbuatan yang dapat dikategorikan sebagai pelanggaran terhadap ketentuan yang berkaitan dengan prinsip kehati-hatian di bidang perbankan;
  - e. Perbuatan dari pengurus dan Pejabat Eksekutif yang dapat dikategorikan tidak independen;
  - f. Memenuhi kriteria kompetensi, dalam arti memiliki:
    - Pengetahuan di bidang perbankan yang memadai;
    - Pengalaman dan keahlian di bidang perbankan dan/atau lembaga keuangan; serta
    - Kemampuan untuk melakukan pengelolaan strategis dalam rangka pengembangan bank yang sehat.

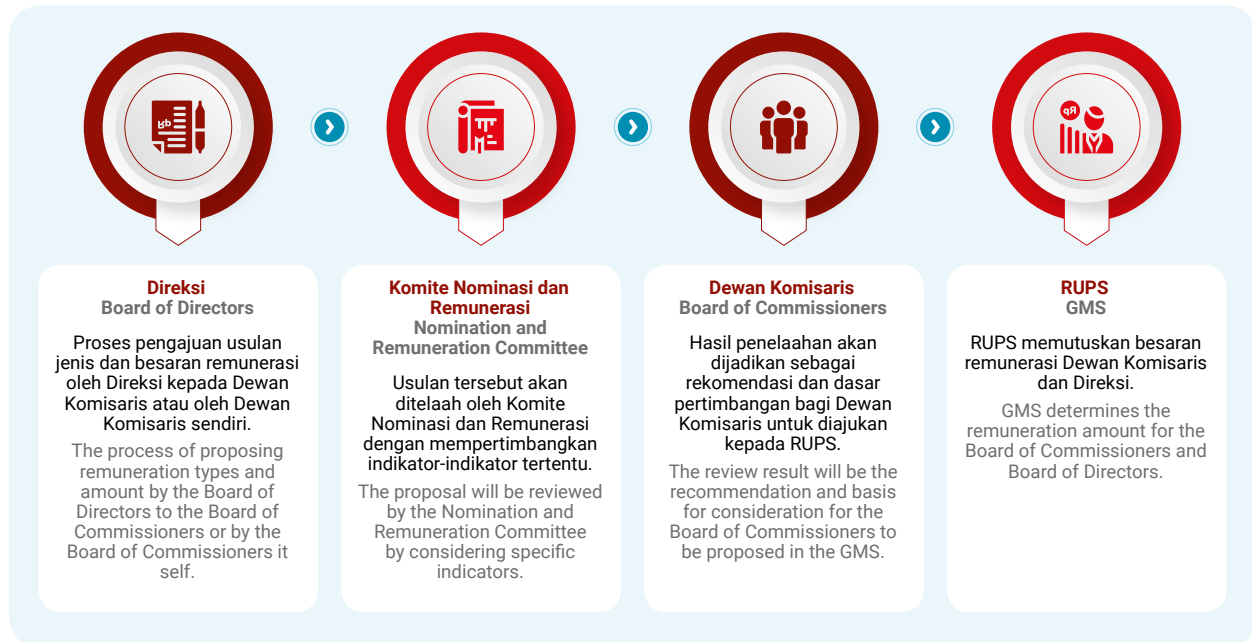
## Dasar dan Kebijakan Remunerasi Dewan Komisaris dan Direksi

Kebijakan Remunerasi Dewan Komisaris dan Direksi Bank berdasarkan pada Peraturan Otoritas Jasa Keuangan No. 45/POJK.03/2015 dan Surat Edaran Otoritas Jasa Keuangan No. 40/SEOJK.03/2016 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum, serta peraturan turunannya. Sementara itu, Kebijakan Sistem Nominasi dan Remunerasi Bank ditetapkan berdasarkan Surat Keputusan Dewan Komisaris No. 001/SK-KOM/12/14 tanggal 10 Desember 2014 dan telah dimutakhirkan berdasarkan Surat Keputusan Dewan Komisaris No. 003/SK-KOM/09/18 tanggal 20 September 2018 tentang Pedoman Komite Nominasi dan Remunerasi PT Bank Victoria International Tbk.

## Basis and Policy of Remuneration for Board of Commissioners and Board of Directors

The Remuneration Policy of the Bank's Board of Commissioners and Board of Directors refers to Financial Services Authority Regulation No. 45/POJK.03/2015 and Financial Services Authority Circular No. 40/SEOJK.03/2016 on Implementation of Governance in Providing Remuneration for Commercial Banks, and the derivative regulations. The Nomination and Remuneration System Policy of the Bank is determined based on the Board of Commissioners' Decision Letter No. 001/SK-KOM/12/14 dated 10 December 2014 and has been updated under the Board of Commissioners' Decision Letter No. 003/SK-KOM/09/18 dated 20 September 2018 on Guidelines of Nomination and Remuneration Committee of PT Bank Victoria International Tbk.

## Prosedur Penetapan Remunerasi Dewan Komisaris dan Direksi Procedure to Determine Remuneration for Board of Commissioners and Board of Directors



## Jenis dan Indikator Penetapan Remunerasi Dewan Komisaris dan Direksi

Dalam menetapkan indikator penetapan remunerasi Dewan Komisaris dan Direksi, Bank mempertimbangkan hal-hal sebagai berikut.

1. Skala usaha;
2. Kompleksitas usaha;
3. *Peer group*;
4. Tingkat inflasi;
5. Kondisi dan kemampuan keuangan Bank; serta
6. Tidak bertentangan dengan peraturan perundang-undangan yang berlaku.

Adapun penerapan remunerasi yang bersifat variabel secara khusus mendorong *prudent risk taking* serta memperhatikan risiko yang paling berpengaruh dalam kegiatan usaha (risiko utama).

Berdasarkan peraturan dan kebijakan terkait, remunerasi Dewan Komisaris dan Direksi terdiri dari:

### Remunerasi yang Bersifat Tetap Fixed Remuneration

Remunerasi ini diberikan dalam bentuk tunai dan dapat juga disertai dengan pemberian remunerasi dalam bentuk tidak tunai serta tidak dikaitkan dengan kinerja dan risiko. Adapun remunerasi yang bersifat tetap meliputi gaji pokok, fasilitas, tunjangan perumahan, tunjangan kesehatan, tunjangan pendidikan, tunjangan hari raya, dan pensiun.

This remuneration is given in cash and can also be accompanied with non-cash remuneration provision which is not related to performance and risk. Fixed remuneration, among others, includes basic salary, facilities, housing allowance, health allowance, education allowance, religious holiday allowance, and retirement plan.

### Remunerasi yang Bersifat Variabel Variable remuneration

Remunerasi ini dikaitkan dengan kinerja dan risiko serta diberikan dalam bentuk tunai dan saham atau instrumen yang berbasis saham yang diterbitkan Bank. Remunerasi yang bersifat variabel antara lain meliputi bonus atau bentuk lain yang dipersamakan dengan itu.

This remuneration is related to the performance and risk and is given in the form of cash and shares or share-based instruments issued by the Bank. Variable remuneration, among others, is bonus or other similar forms.

## Types and Indicators to Determine Remuneration for the Board of Commissioners and Board of Directors

In setting out the indicators to determine remuneration for the Board of Commissioners and Board of Directors, the Bank considers the following matters.

1. Business scale;
2. Business complexity;
3. Peer group;
4. Inflation rate;
5. Bank's condition and financial capability; and
6. No contradiction with the prevailing laws and regulations.

Implementation of variable remuneration shall specifically promote the prudent risk taking and consider the most affecting risk in the business activities (the main risk).

Based on relevant regulations and policies, the remuneration for the Board of Commissioners and Board of Directors consists of:



## Penetapan *Material Risk Takers*

Penentuan *Material Risk Taker* (MRT) dikategorikan sebagai berikut.

1. MRT dapat ditentukan dengan menggunakan metode kualitatif sesuai dengan porsi tanggung jawab yang berpengaruh terhadap profil risiko utama yang akan ditentukan berdasarkan evaluasi profil risiko yang ditentukan Bank setiap tahunnya; dan
2. Penentuan kategori MRT juga dapat dilakukan secara kuantitatif melalui perbandingan pemberian remunerasi bersifat variabel antara MRT dan karyawan non-MRT dengan pertimbangan terhadap kinerja dan juga tingkat risiko jabatan yang bersangkutan. Dengan demikian, maka Dewan Komisaris, Direksi, dan/atau karyawan yang memperoleh remunerasi yang bersifat variabel dengan nilai yang besar dikategorikan sebagai MRT.

## Penangguhan atau Penarikan Kembali Remunerasi

Bank dapat tidak membagikan remunerasi yang bersifat variabel dengan nilai yang relatif kecil serta menarik kembali remunerasi yang bersifat variabel yang sudah dibayarkan (*clawback*) kepada pihak yang menjadi MRT, seperti Dewan Komisaris dan Direksi apabila Bank mengalami kerugian. Kondisi Bank yang menyebabkan penangguhan atau penarikan kembali remunerasi yang bersifat variabel, di antaranya:

1. Bank mengalami kerugian;
2. Terjadinya risiko yang berdampak negatif terhadap keuangan Bank;
3. Terjadi *fraud* yang dilakukan oleh pihak yang menjadi MRT yang merugikan Bank; dan/atau
4. Kondisi lainnya.

Besaran persentase penangguhan pembayaran didasarkan pada kriteria stabilitas keuangan Bank, kecukupan dan penguatan permodalan Bank, kebutuhan likuiditas jangka pendek dan jangka panjang, potensi pendapatan di masa yang akan datang, serta risiko utama yang dihadapi Bank. Adapun jangka waktu penangguhan pembayaran remunerasi paling sedikit 3 (tiga) tahun dan dapat disesuaikan menjadi lebih panjang sesuai dengan jangka waktu risiko (*time horizon of risk*). Terkait hal ini, Dewan Komisaris dan Direksi dilarang melakukan lindung nilai atas remunerasi yang bersifat variabel yang ditangguhkan.

## Kaitan Remunerasi dengan Risiko dan Kinerja

Penetapan remunerasi yang bersifat variabel bagi Dewan Komisaris dan Direksi disesuaikan dengan risiko utama yang dihadapi Bank, serta perubahannya. Hal ini ditentukan berdasarkan kriteria dan dampak risiko terhadap Bank. Apabila risiko utama tersebut dialami Bank, maka remunerasi Dewan

## Establishing Material Risk Takers

The establishment of Material Risk Taker (MRT) is categorized as follows.

1. MRT can be determined by using qualitative method according to the portion of responsibility that affects main risk profile which will be determined based on risk profile evaluation, as determined by the Bank annually; and
2. MRT category can also be determined quantitatively through comparison of variable remuneration provision between MRT and non-MRT employees, by considering their performance and positional risk. Therefore, the Board of Commissioners, Board of Directors, and/or employees receiving a high amount variable remuneration are categorized as the MRT.

## Remuneration Suspension or Clawback

The Bank may not be able to distribute relatively small amount of variable remunerations and may withdraw the variable remuneration which have already been paid (*clawback*) to the MRT party such as Board of Commissioners and Board of Directors, if the Bank suffers a loss. The Bank's conditions that may cause suspension or clawback on the paid variable remuneration among others are:

1. The Bank suffers a loss;
2. The occurrence of risk that causes material adverse impact to the Bank's financial condition;
3. Fraud committed by an MRT party that is detrimental to the Bank; and/or
4. Other conditions.

The percentage of payment suspension refers to the Bank's financial stability criteria, Bank's capital adequacy and strengthening, short-term and long-term liquidity requirement, potential revenue in the future, and main risks the Bank has to deal with. The suspension period will be at least 3 (three) years and can be adjusted to a longer period according to the time horizon of the risk. In relation to this matter, the Board of Commissioners and Board of Directors are prohibited from conducting hedging against the suspended variable remuneration.

## Connection of Remuneration with Risk and Performance

The determination of variable remuneration for the Board of Commissioners and Board of Directors is adjusted to the main risks faced by the Bank and their changes. This is determined based on criteria and the impact of the risk to the Bank. If the Bank has to deal with the main risks, then the remuneration for the Board of

Komisaris dan Direksi sebagai MRT akan mendapat pengaruh. Selain itu, penetapan remunerasi yang bersifat variabel bagi Dewan Komisaris dan Direksi juga disesuaikan dengan pengukuran kinerja individu dan kolegal oleh Dewan Komisaris dan Direksi. Dengan mempertimbangkan hasil pengukuran kinerja Dewan Komisaris dan Direksi, Komite Nominasi dan Remunerasi akan memberikan masukan/rekomendasi kepada Dewan Komisaris terkait besaran remunerasi yang layak diterima. Rekomendasi tersebut disampaikan Dewan Komisaris kepada RUPS untuk penetapan remunerasi bagi Dewan Komisaris dan Direksi.

## Struktur dan Besaran Remunerasi Dewan Komisaris dan Direksi

Komponen remunerasi Dewan Komisaris dan Direksi terdiri dari:

1. Remunerasi yang bersifat tetap, meliputi:
  - a. Honorarium;
  - b. Benefit sesuai dengan ketentuan Bank, seperti asuransi kesehatan, kendaraan dinas, BPJS Ketenagakerjaan, dan tunjangan hari raya (THR); serta
3. Remunerasi yang bersifat variabel, meliputi tantiem/gratifikasi dan saham.

Remunerasi Dewan Komisaris dan Direksi tersebut dapat diberikan secara tunai ataupun non-tunai, yakni dalam bentuk natura (rumah dan kendaraan dinas, serta bentuk lainnya yang dapat dimiliki maupun tidak dapat dimiliki) dan saham. Selain itu, dalam penetapan remunerasi, terdapat perbedaan besaran remunerasi yang diterima Dewan Komisaris dan Direksi. Perbedaan besaran remunerasi yang bersifat variabel tersebut disesuaikan dengan kinerja dan tingkat tugas dan tanggung jawab Dewan Komisaris dan Direksi.

Rincian informasi mengenai remunerasi Dewan Komisaris dan Direksi Bank diungkapkan sebagai berikut.

Jenis Remunerasi Type of Remuneration	Dewan Komisaris Board of Commissioners		Direksi Board of Directors	
	Orang People	Jumlah Total (Rp)	Orang People	Jumlah Total (Rp)
Remunerasi Bersifat Tetap (Gaji dan THR) Fixed Remuneration (Salary and THR Allowance)	3	2,409,749,022	5	12,792,853,723
Remunerasi Bersifat Variabel (Bonus) Variable Remuneration (Bonus)	3	-	5	-
<b>Total</b>	<b>Total</b>	<b>2,409,749,022</b>		<b>12,792,853,723</b>

Commissioners and Board of Directors as the MRT will be affected. In addition, determination of variable remuneration for the Board of Commissioners and Board of Directors is also adjusted with the Board of Commissioners and Board of Directors' individual and collegial performance. By considering the assessment result on the Board of Commissioners and Board of Directors' performance, the Nomination and Remuneration Committee will give an input/recommendation to the Board of Commissioners related to the proper remuneration amount to be received. Such recommendation will thereafter be proposed by the Board of Commissioners to the GMS to determine the remuneration for the Board of Commissioners and Board of Directors.

## Remuneration Structure and Amount for the Board of Commissioners and Board of Directors

Board of Commissioners and Board of Directors' remuneration components consist of:

1. Fixed remuneration that includes:
  - a. Honorarium;
  - b. Benefits in accordance with the Bank's regulation, such as health insurance, official vehicle, BPJS Employment, and religious holiday allowance (THR); and
2. Variable remuneration that includes bonuses/gratification and shares.

Remuneration for the Board of Commissioners and Board of Directors may be provided in the form of cash or non-cash, i.e. in the form of natura facilities (house and official vehicle, and other forms that may or may not be owned) and shares. In addition, in determining the remuneration, there is difference between amount to be received by the Board of Commissioners and amount to be received by the Board of Directors. Difference in variable remuneration amount is adjusted according to the performance and level of duties and responsibilities between Board of Commissioners and Board of Directors.

Detailed information on remuneration for Board of Commissioners and Board of Directors of the Bank is disclosed below.

### Remunerasi Dewan Komisaris dan Direksi berdasarkan Bentuk

Remuneration for Board of Commissioners and Board of Directors based on its Form

Bentuk Remunerasi Form of Remuneration	Dewan Komisaris Board of Commissioners		Direksi Board of Directors	
	Orang People	Jumlah Total (Rp)	Orang People	Jumlah Total (Rp)
Remunerasi dalam Bentuk Tunai Remuneration in the form of Cash	3	2,409,749,022	5	12,792,853,723
Remunerasi dalam Bentuk Natura Remuneration in the form of Natura	2	-	5	-
Remunerasi dalam Bentuk Saham Remuneration in the form of Shares	-	-	-	-
<b>Total</b>		<b>2,409,749,022</b>		<b>12,792,853,723</b>

### Kelompok Remunerasi Dewan Komisaris dan Direksi

Remuneration Group of Board of Commissioners and Board of Directors

Jumlah Remunerasi dalam Setahun Total Remuneration in a Year	Jumlah Dewan Komisaris Total Board of Commissioners (Orang / People)	Jumlah Direksi Total Board of Directors (Orang / People)
Di atas Rp2 miliar Above Rp2 billion	-	3
Di atas Rp1 miliar - Rp2 miliar Above Rp1 billion - Rp2 billion	1	2
Di atas Rp500 juta - Rp1 miliar Above Rp500 million - Rp1 billion	2	-
Di bawah Rp500 juta Below Rp500 million	-	-

### Remunerasi yang Ditangguhkan atau Ditarik Kembali

Pada tahun 2021, tidak terdapat remunerasi Dewan Komisaris dan Direksi yang ditangguhkan atau ditarik kembali.

### Suspended or Clawback Remuneration

In 2021, there was no suspended or clawback remuneration of the Board of Commissioners and Board of Directors.

### Pengungkapan Bonus Kinerja, Bonus Non-Kinerja, dan Opsi Saham

Pemberian bonus kinerja, bonus non-kinerja, dan opsi saham oleh Bank Victoria kepada Dewan Komisaris dan Direksi diungkapkan sebagai berikut.

### Disclosure of Performance Bonus, Non-Performance Bonus, and Stock Option

Provision of performance bonus, non-performance bonus, stock option by Bank Victoria to the Board of Commissioners and the Board of Directors is as disclosed below.

Jabatan Position	Jumlah Total (Orang / People)	Bonus Kinerja Performance Bonus (Rp)	Bonus Non-kinerja Non-Performance Bonus (Rp)	Opsi Saham Stock Option (Lembar Saham / Shares)
Dewan Komisaris Board of Commissioners	3	-	-	-
Direksi Board of Directors	5	-	-	-

## Rasio Gaji Tertinggi dan Terendah

Bank Victoria senantiasa memperhatikan kesesuaian rasio gaji Dewan Komisaris, Direksi, dan seluruh karyawan Bank dengan mempertimbangkan tingkat tugas dan tanggung jawab yang diemban. Informasi terkait rasio gaji Bank Victoria selama tahun 2021 diungkapkan sebagai berikut.

Uraian	Rasio Ratio	Description
Gaji Tertinggi dan Terendah Dewan Komisaris	1:0.5	Board of Commissioners' Highest and Lowest Salary
Gaji Tertinggi dan Terendah Direksi	1:2	Board of Directors' Highest and Lowest Salary
Gaji Tertinggi dan Terendah Karyawan	1:20	Employees' Highest and Lowest Salary

## Ratio of Highest and Lowest Salary

Bank Victoria consistently pays attention to the conformity of salary ratio between the Board of Commissioners, Board of Directors, and all of the Bank's employees by considering the level of duties and responsibilities assumed. Information on Bank Victoria's salary ratio throughout 2021 is as disclosed below.

## Informasi Lain terkait Tata Kelola Remunerasi

Pada tahun 2021, tidak terdapat perselisihan internal di Bank Victoria yang berkaitan dengan intervensi pemilik, perselisihan internal atau permasalahan yang timbul sebagai dampak kebijakan remunerasi pada Bank.

## Other Information related to Remuneration Governance

In 2021, there wasn't any internal conflict in Bank Victoria related to owner intervention, internal conflict, nor was there any problem arising as an impact of remuneration policy in the Bank.

## Komite di Bawah Dewan Komisaris Board of Commissioners' Subordinate Committees

Dewan Komisaris membentuk Komite di Bawah Dewan Komisaris untuk memenuhi pelaksanaan tugas dan tanggung jawab Dewan Komisaris yang disesuaikan dengan tingkat kebutuhan Dewan Komisaris dan kompleksitas usaha Bank. Komite di Bawah Dewan Komisaris tersebut terdiri dari Komite Pemantau Risiko, Komite Nominasi dan Remunerasi, serta Komite Audit.

The Board of Commissioners established Subordinate Committees to fulfill the implementation of the Board of Commissioners' duties and responsibilities, which are adjusted according to the Board of Commissioners' requirement level and the Bank's business complexity. Board of Commissioners' Subordinate Committees comprises Risk Monitoring Committee, Nomination and Remuneration Committee and Audit Committee.

### Komite Pemantau Risiko

Komite Pemantau Risiko merupakan komite yang dibentuk oleh Dewan Komisaris dalam rangka mendukung efektivitas pelaksanaan tugas dan tanggung jawab yang berhubungan dengan pengawasan manajemen risiko, terbangunnya budaya manajemen risiko, dan teridentifikasinya risiko-risiko signifikan yang memerlukan perhatian Dewan Komisaris.

### Risk Monitoring Committee

The Risk Monitoring Committee is a committee established by the Board of Commissioners for the purpose of supporting the effective execution of duties and responsibilities related to risk management supervision, formation of risk management culture, and identification of significant risks requiring the Board of Commissioners' attention.

## Dasar Pembentukan Komite Pemantau Risiko

Pembentukan Komite Pemantau Risiko Bank berdasarkan peraturan berikut.

1. Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penerapan Tata Kelola bagi Bank Umum;
2. Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penilaian Kesehatan Bank Umum;
3. Peraturan Otoritas Jasa Keuangan No. 4/POJK.03/2016 tanggal 26 Januari 2016 tentang Penilaian Kesehatan Bank Umum;
4. Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 tanggal 7 Desember 2016 tentang Tata Kelola bagi Bank Umum;
5. Peraturan Otoritas Jasa Keuangan No. 8/POJK.04/2015 tanggal 25 Juni 2015 tentang Situs Web Emiten atau Perusahaan Publik;
6. Undang-Undang No. 6 tahun 2009 tanggal 13 Januari 2009 tentang Penerapan Peraturan Pemerintah Pengganti Undang-Undang No. 2 tahun 2008 tentang Perubahan Kedua atas Undang-Undang No. 23 tahun 1999 tentang Bank Indonesia; dan
7. Undang-Undang No. 40 tahun 2007 tanggal 16 Agustus 2007 tentang Perseroan Terbatas.

## Pedoman Komite Pemantau Risiko

Pelaksanaan tugas dan tanggung jawab Komite Pemantau Risiko mengacu pada Pedoman Kerja Komite Pemantau Risiko yang telah dimutakhirkan melalui Keputusan Dewan Komisaris No. 001/SK-KOM/09/20 tanggal 9 September 2020 tentang Piagam dan Pedoman Kerja Komite Pemantau Risiko PT Bank Victoria International Tbk.

## Tugas dan Tanggung Jawab Komite Pemantau Risiko

Berikut uraian tugas dan tanggung jawab Komite Pemantau Risiko Bank Victoria beserta realisasinya.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Melakukan pengkajian ulang dan memberikan rekomendasi atas efektivitas pelaksanaan manajemen risiko Bank melalui pertemuan secara berkala maupun cara lainnya untuk membahas progres dari tahapan-tahapan tugas dan tanggung jawab yang dilakukan oleh Satuan Kerja Manajemen Risiko.</p> <p>Review and provide recommendations on the effectiveness of the Bank's risk management implementation through regular meetings or other methods to discuss the progress of duties and responsibilities carried out by the Risk Management Work Unit.</p>	<p>Menelaah dan memberikan rekomendasi pada beberapa parameter risiko internal dan kualitas penerapan manajemen risiko bank seperti profil risiko secara individu dan <i>risk-based bank rating</i> (RBBR).</p> <p>Reviewed and provided recommendations on several internal risks parameters and the Bank's risk management implementation quality, such as individual risk profile and and risk-based bank rating (RBBR).</p>
<p>Melakukan pengawasan atas kegiatan Satuan Kerja Manajemen Risiko dalam memantau pelaksanaan mitigasi risiko oleh Unit-Unit Kerja terkait.</p> <p>Oversee activities of the Risk Management Work Unit in monitoring the implementation of risk mitigation by related Work Units.</p>	<p>Mengawasi kegiatan Divisi <i>Risk Management /Integrated</i>, antara lain:</p> <ol style="list-style-type: none"> <li>1. Pelaporan Profil Risiko secara Individu; dan</li> <li>2. <i>Risk based bank rating</i> (RBBR).</li> </ol> <p>Monitored the Risk Management/Integrated Division's activities, among others:</p> <ol style="list-style-type: none"> <li>1. Risk Profile Individual Reporting; and</li> <li>2. Risk-based bank rating (RBBR).</li> </ol>

## Basis of Establishment of the Risk Monitoring Committee

The basis of establishment of the Bank's Risk Monitoring Committee are as follows.

1. Financial Services Authority Circular No. 13/SEOJK.03/2017 dated 17 March 2017 on Implementation of Governance for Commercial Banks;
2. Financial Services Authority Circular No. 14/SEOJK.03/2017 dated 17 March 2017 on Assessment of Soundness Level of Commercial Banks;
3. Financial Services Authority Regulation No. 4/POJK.03/2016 dated 26 January 2016 on Assessment of Soundness Level of Commercial Banks;
4. Financial Services Authority Regulation No. 55/POJK.03/2016 dated 7 December 2016 on Implementation of Governance for Commercial Banks;
5. Financial Services Authority Regulation No. 8/POJK.04/2015 dated 25 June 2015 on Website of Issuers or Public Companies;
6. Law No. 6 of 2009 dated 13 January 2009 on Implementation of Government Regulation in Lieu of Law No. 2 of 2008 on the Second Amendment to Law No. 23 of 1999 on Bank Indonesia; and
7. Law No. 40 of 2007 dated 16 August 2007 on Limited Liability Companies.

## Risk Monitoring Committee Charter

The implementation of Risk Monitoring Committee's duties and responsibilities refers to Risk Monitoring Committee Charter which was updated under Board of Commissioners' Decision Letter No. 001/SK-KOM/09/20 dated 9 September 2020 on the Charter and Work Guidelines of the Risk Monitoring Committee of PT Bank Victoria International Tbk.

## Duties and Responsibilities of the Risk Monitoring Committee

Duties and responsibilities of Bank Victoria's Risk Monitoring Committee and the realization are explained below.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Melakukan pengawasan atas pelaksanaan rekomendasi Komite oleh Satuan Kerja Manajemen Risiko.</p> <p>Oversee the implementation of the Committee's recommendations by the Risk Management Work Unit.</p>	<p>Melaksanakan pengawasan rekomendasi, seperti:</p> <ol style="list-style-type: none"> <li>1. Penjelasan pada <i>inherent</i> maupun Komite Pemantau Risiko agar sejalan dengan fluktuasi yang terjadi pada nilai profil risiko masing-masing;</li> <li>2. Perubahan <i>risk appetite</i> agar dipastikan dan dianalisa bahwa perubahan tersebut tidak membawa dampak risiko bagi Bank; dan</li> <li>3. Permasalahan ketergantungan terhadap satu <i>programmer information teknologi (key man exposure)</i> diharuskan ada tindak lanjut sebagai solusi dari pihak manajemen.</li> </ol> <p>Performed monitoring on the recommendations, such as:</p> <ol style="list-style-type: none"> <li>1. Explanation on inherent to Risk Monitoring Committee to be aligned with the fluctuation exist in each risk profile value;</li> <li>2. Changes on risk appetite must be ensured and analyzed that those changes will not bring adverse impact to the Bank; and</li> <li>3. Issue regarding dependency on one information technology programmer (key man exposure) must be followed-up as a solution from the management.</li> </ol>
<p>Melakukan analisis dan evaluasi atas usulan Rencana Kegiatan dan Anggaran Bank serta pengkajian ulang tahunan atas rencana jangka panjang Bank yang diajukan oleh Direksi, termasuk usulan setoran modal dan rencana investasi di Entitas Anak Bank.</p> <p>Perform analysis and evaluation of Bank Activity and Budget Plan proposal, as well as annual review of the Bank's Long-Term Plan submitted by the Board of Directors, including proposed paid-in capital and investment plans in the Bank's Subsidiaries.</p>	<p>Melakukan analisis dan evaluasi rencana kegiatan dan Anggaran Bank, serta pengkajian ulang tahunan atas rencana jangka panjang Bank.</p> <p>Perfomed analysis and evaluation on the Bank's Activity and Budget Plan, and conducted annual review on the Bank's long-term plan.</p>
<p>Melakukan penelaahan atas informasi risiko dan manajemen risiko Bank dalam laporan-laporan yang akan dipublikasikan, melalui proses:</p> <ol style="list-style-type: none"> <li>1. Diskusi bersama dengan manajemen;</li> <li>2. Pengkajian ulang atas <i>draft</i> dari laporan yang akan dipublikasikan;</li> <li>3. Melakukan pembahasan atas risiko-risiko penting pada unit-unit di lingkungan Bank, sesuai kebutuhan, termasuk risiko pada perjanjian dengan pihak ketiga yang dalam lingkup kewenangan pengawasan Dewan Komisaris; serta</li> <li>4. Melakukan <i>self evaluation</i> dan <i>self improvement</i> terhadap efektivitas pelaksanaan tugas komite dan memutakhirkan secara periodik Piagam dan Pedoman Kerja Komite Pemantau Risiko (<i>Risk Monitoring Committee Charter</i>).</li> </ol> <p>Review the Bank's risk information and Bank risk management in reports to be published, through the following processes:</p> <ol style="list-style-type: none"> <li>1. Discussions with management;</li> <li>2. Review draft of report to be published;</li> <li>3. Discuss important risks in units within the Bank's circle, as required, including risks on agreements with third parties, within the scope of the Board of Commissioners' supervisory capacity; and</li> <li>4. Perform self evaluation and self improvement on the effectiveness of its duties, and periodically update the Risk Monitoring Committee's Charter.</li> </ol>	<p>Menelaah dan memberikan rekomendasi atas profil risiko posisi Desember 2021, <i>strategi action plan</i> dan target <i>date</i> rencana kerja 2021, <i>risk-based bank rating</i> (RBBR), kualitas kredit dan konsentrasi kredit, rasio AYDA, dan <i>risk registered</i>.</p> <p>Reviewed and provided recommendations on risk profile for December 2021 position, strategic action plans, and target date of 2020 work plan, Risk Based Bank Rating (RBBR), credit quality, and credit concentration, foreclosed assets (AYDA) ratio, and risk registered.</p>

## Komposisi Komite Pemantau Risiko

Komite Pemantau Risiko terdiri dari 1 (satu) orang Komisaris Independen sebagai ketua dan 2 (dua) orang pihak independen. Masing-masing anggota Komite Pemantau Risiko diangkat dan diberhentikan oleh Dewan Komisaris melalui mekanisme rapat.

Untuk anggota Komite Pemantau Risiko yang merangkap sebagai anggota Dewan Komisaris, masa jabatannya sama dengan masa kerja penunjukan sebagai anggota Dewan Komisaris yang ditentukan oleh RUPS. Untuk Komite Pemantau Risiko yang bukan merupakan anggota Dewan Komisaris, masa jabatannya tidak lebih lama dari masa jabatan Dewan Komisaris dengan tidak mengurangi hak Dewan Komisaris untuk memberhentikan.

Adapun syarat menjadi anggota Komite Pemantau Risiko adalah memiliki integritas, akhlak, dan moral yang baik, memiliki pemahaman yang relevan dan signifikan dengan bisnis Bank,

## Composition of the Risk Monitoring Committee

Risk Monitoring Committee comprises 1 (one) Independent Commissioner as the chairperson and 2 (two) independent parties. Each member of Risk Monitoring Committee is appointed and dismissed by the Board of Commissioners through a meeting mechanism.

Members of the Risk Monitoring Committee who hold concurrent position as members of the Board of Commissioners will have the same term of office as the term of office of their appointment as members of the Board of Commissioners as determined by the GMS. For members of Risk Monitoring Committee who are not members of the Board of Commissioners, their term of office will not be longer than the Board of Commissioners' term of office, without prejudice to the Board of Commissioners' right to dismiss them.

Requirements to be a member of the Risk Monitoring Committee are having good integrity, ethics, and morals, possessing relevant and significant comprehension on the Bank's



serta salah satu anggota komite memiliki keahlian di bidang keuangan dan perbankan pada umumnya dan memiliki pemahaman yang mendalam tentang aspek manajemen risiko.

**Periode 13 September 2019-8 April 2021**

Susunan keanggotaan Komite Pemantau Risiko periode 13 September 2019-8 April 2021 yang ditetapkan melalui Surat Keputusan Direksi No. 005/SK-DIR/09/19 tanggal 13 September 2019 diungkapkan sebagai berikut.

business, and one of the members has an expertise in financial and banking sector in general, and possesses an in-depth comprehension regarding risk management aspect.

**Period of 13 September 2019-8 April 2021**

Composition of Risk Monitoring Committee for the period of 13 September 2019-8 April 2021 which was stipulated under Board of Directors' Decision Letter No. 005/SK-DIR/09/19 dated 13 September 2019 is as disclosed below.

<b>Nama Name</b>	<b>Posisi di Komite Position in the Committee</b>	<b>Jabatan di Bank Position at the Bank</b>	<b>Keahlian Expertise</b>
Zaenal Abidin, PhD	Ketua Komite Pemantau Risiko Chairperson of the Risk Monitoring Committee	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	Perbankan, Manajemen Risiko, dan GCG Banking, Risk Management, and GCG
Oliver Simorangkir	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	Komisaris Utama President Commissioner	Perbankan dan Audit Banking and Audit
Retno Dwijanti Widaningsih	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	Pihak Independen Independent Party	Perbankan dan Audit Banking and Audit
Yozef Abdulrachman	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	Pihak Independen Independent Party	Manajemen Risiko dan Perbankan Risk Management and Banking

**Periode 8 April 2021-26 Oktober 2021**

Susunan keanggotaan Komite Pemantau Risiko periode 8 April 2021-26 Oktober 2021 yang ditetapkan melalui Surat Keputusan Direksi No. 003/SK-DIR/04/21 tanggal 8 April 2021 diungkapkan sebagai berikut.

**Period of 8 April 2021-26 October 2021**

Composition of Risk Monitoring Committee for the period of 8 April 2021-26 October 2021, which was stipulated under Board of Directors' Decision Letter No. 003/SK-DIR/04/21 dated 8 April 2021 is as disclosed below.

<b>Nama Name</b>	<b>Posisi di Komite Position in the Committee</b>	<b>Jabatan di Bank Position at the Bank</b>	<b>Keahlian Expertise</b>
Zaenal Abidin, PhD	Ketua Komite Pemantau Risiko Chairperson of the Risk Monitoring Committee	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	Perbankan, Manajemen Risiko, dan GCG Banking, Risk Management, and GCG
Oliver Simorangkir	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	Komisaris Utama President Commissioner	Perbankan dan Audit Banking and Audit
Ignace Widiatmoko	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	Pihak Independen Independent Party	Perbankan Audit Audit Banking
Yozef Abdulrachman	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	Pihak Independen Independent Party	Manajemen Risiko dan Perbankan Risk Management and Banking

**Periode 26 Oktober 2021-Sekarang**

Susunan keanggotaan Komite Pemantau Risiko periode 26 Oktober 2021-sekarang yang ditetapkan melalui Surat Keputusan Direksi No. 006/SK-DIR/10/21 tanggal 26 Oktober 2021 diungkapkan sebagai berikut.

**Period of 26 October 2021-Now**

The structure and composition of Risk Monitoring Committee for the period of 26 October 2021-now,, as determined by the Board of Directors' Decision Letter No. 006/SK-DIR/10/21 dated 26 October 2021, are disclosed as follows.

<b>Nama Name</b>	<b>Posisi di Komite Position in the Committee</b>	<b>Jabatan di Bank Position at the Bank</b>	<b>Keahlian Expertise</b>
Zaenal Abidin, PhD	Ketua Komite Pemantau Risiko Chairperson of the Risk Monitoring Committee	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	Perbankan, Manajemen Risiko, dan GCG Banking, Risk Management, and GCG



<b>Nama Name</b>	<b>Posisi di Komite Position in the Committee</b>	<b>Jabatan di Bank Position at the Bank</b>	<b>Keahlian Expertise</b>
Oliver Simorangkir	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	Komisaris Utama President Commissioner	Perbankan dan Audit Banking and Audit
Medi Sejati	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	Pihak Independen Independent Party	Perbankan dan Audit Banking and Audit
Yozef Abdulrachman	Anggota Komite Pemantau Risiko Member of the Risk Monitoring Committee	Pihak Independen Independent Party	Manajemen Risiko dan Perbankan Risk Management and Banking

### Independensi Komite Pemantau Risiko

Seluruh anggota Komite Pemantau Risiko telah memenuhi semua kriteria independensi dan mampu untuk menjalankan tugasnya secara independen, serta menjunjung tinggi kepentingan Bank. Adapun aspek independensi Komite Pemantau Risiko dijelaskan sebagai berikut.

### Independency of the Risk Monitoring Committee

All members of the Risk Monitoring Committee have met all independency criteria and are capable of performing their duties independently, and uphold the Bank's interest. The independency aspects of the Risk Monitoring Committee are as explained hereinbelow.

<b>Aspek Independensi Independency Aspect</b>	<b>Zaenal Abidin, PhD</b>	<b>Oliver Simorangkir</b>	<b>Medi Sejati*</b>	<b>Ignace Widiatmoko**</b>	<b>Retno Dwijanti Widaningsih***</b>	<b>Yozef Abdulrachman</b>
Tidak memiliki hubungan keuangan dengan Dewan Komisaris, Direksi, serta Pemegang Saham Utama dan Pengendali. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders.	✓	✓	✓	✓	✓	✓
Tidak memiliki hubungan kepemilikan saham di Bank, baik secara langsung maupun tidak langsung. Does not have share ownership relationship in the Bank, either directly or indirectly.	✓	✓	✓	✓	✓	✓
Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, maupun perusahaan afiliasi. Does not have management relationship in the Bank, Subsidiary, and affiliated company.	✓	✓	✓	✓	✓	✓
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, Pemegang Saham Utama dan Pengendali, dan/atau sesama anggota Komite Pemantau Risiko. Does not have family relationship with the Board of Commissioners, Board of Directors, Main and Controlling Shareholders, and/or among members of Risk Monitoring Committee.	✓	✓	✓	✓	✓	✓
Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah. Does not hold position as administrator of political party, state, and government.	✓	✓	✓	✓	✓	✓

\* Menjabat sejak 26 Oktober 2021.

\*\* Menjabat sejak 8 April 2021 sampai 26 Oktober 2021.

\*\*\* Menjabat sampai 8 April 2021.

\* Holding the position since 26 October 2021.

\*\* Holding the position from 8 April 2021 to 26 October 2021.

\*\*\* Holding the position until 8 April 2021.

## Rapat Komite Pemantau Risiko Kebijakan Rapat Komite Pemantau Risiko

Komite Pemantau Risiko melaksanakan rapat sesuai keperluan Bank, sekurang-kurangnya setiap 4 (empat) kali dalam setahun. Rapat Komite Pemantau Risiko hanya dapat dilaksanakan jika dihadiri oleh paling kurang 51,00% dari jumlah anggota termasuk seorang Komisaris Independen dan pihak independen.

Komite Pemantau Risiko dapat mengundang Satuan Kerja Manajemen Risiko dan/atau Direktur yang membawahi Manajemen Risiko Bank serta dapat mengundang siapapun yang diperlukan sebagai narasumber bahasan seperti Pejabat Eksekutif Bank, SKAI, auditor eksternal ataupun penasihat eksternal.

## Frekuensi dan Kehadiran Rapat Komite Pemantau Risiko

Pada tahun 2021, frekuensi dan kehadiran Rapat Komite Pemantau Risiko diuraikan sebagai berikut.

Tanggal Date	Agenda	Zaenal Abidin, PhD	Oliver Simorangkir	Medi Sejati*	Ignace Widiatmoko**	Retno Dwijanti Widaningsih***	Yozef Abdurachman
21 April 2021	Laporan Profil Risiko Triwulan I dan Laporan Kepatuhan. Risk Profile Report Quarter I and Compliance Report.	✓	✓	-	✓	-	✓
23 Juni 2021 23 June 2021	Laporan Profil Risiko Triwulan II dan Laporan Kepatuhan. Risk Profile Report Quarter II and Compliance Report.	✓	✓	-	✓	-	✓
18 Oktober 2021 18 October 2021	Laporan Profil Risiko Triwulan III dan Laporan Kepatuhan. Risk Profile Report Quarter III and Compliance Report.	✓	✓	-	✓	-	✓
10 Desember 2021 10 December 2021	Laporan Profil Risiko Triwulan IV dan Laporan Kepatuhan. Risk Profile Report Quarter IV and Compliance Report.	✓	✓	✓	-	-	✓
<b>Total Kehadiran dalam Rapat</b> Total Meeting Attendance		<b>4</b>	<b>4</b>	<b>1</b>	<b>3</b>	<b>0</b>	<b>4</b>
<b>Total Rapat</b> Total Meetings		<b>4</b>	<b>4</b>	<b>1</b>	<b>3</b>	<b>0</b>	<b>4</b>
<b>Tingkat Kehadiran (%)</b> Attendance Rate (%)		<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>0.00</b>	<b>100.00</b>
<b>Rata-rata Kehadiran (%)</b> Average Attendance (%)		<b>100.00</b>					

\* Menjabat sejak 26 Oktober 2021.

\*\* Menjabat sejak 8 April 2021 sampai 26 Oktober 2021.

\*\*\* Menjabat sampai 8 April 2021.

\* In position since 26 October 2021.

\*\* In position from 8 April 2021 to 26 October 2021.

\*\*\* In position until 8 April 2021.

## Laporan Singkat Pelaksanaan Kegiatan Komite Pemantau Risiko Tahun 2021

Pada tahun 2021, Komite Pemantau Risiko telah melakukan aktivitas peninjauan dan penelaahan profil risiko melalui diskusi dan rapat bersama Unit Kerja yang terkait sebagai berikut.

1. Laporan Tahunan Komite Pemantau Risiko di tahun 2020;
2. Penelaahan Laporan Profil Risiko Triwulan IV 2020;
3. Penelaahan Laporan Kepatuhan Triwulan IV 2020;
4. Penyusunan *risk register* dan pelaporan profil risiko;

## Risk Monitoring Committee Meeting Risk Monitoring Committee's Meeting Policy

The Risk Monitoring Committee holds meetings according to the Bank's requirement, at least 4 (four) times in a year. The Risk Monitoring Committee meetings can only be held if attended by at least 51.00% of the total members including an Independent Commissioner and independent party.

The Risk Monitoring Committee may invite Risk Management Work Unit and/or Director in charge of the Bank's Risk Management and may invite any one needed as a referral in the discussion, such as the Bank's Executive Officer, Internal Audit Work Unit, external auditor or external advisor.

## Risk Monitoring Committee's Meeting Frequency and Attendance

The Risk Monitoring Committee's meeting frequency and attendance in 2021 are as presented below.

## Brief Report on Risk Monitoring Committee's Activities In 2021

During 2021, the Risk Monitoring Committee reviewed and assessed risk profiles through discussions and joint meeting with relevant Units, as listed below.

1. Annual Report of the Risk Monitoring Committee in 2020;
2. Review of Risk Profile Report Quarter IV 2020;
3. Review of Compliance Report Quarter IV 2020;
4. Preparation of risk registers and risk profile reporting;

5. Penelaahan Laporan Profil Risiko Triwulan II dan Laporan Kepatuhan Triwulan II Tahun 2021;
6. Penelaahan Laporan Kepatuhan Semester I 2021 Bank;
7. Arahan Laporan Profil Risiko Triwulan II dan Laporan Kepatuhan Triwulan II Tahun 2021;
8. Tinjau ulang atas kajian kepemilikan saham Bank; dan
9. Rencana kerja Komite Pemantau Risiko tahun 2022.

## Komite Nominasi dan Remunerasi

Komite Nominasi dan Remunerasi merupakan komite yang dibentuk oleh dan bertanggung jawab kepada Dewan Komisaris dalam membantu melaksanakan fungsi dan tugas Dewan Komisaris terkait nominasi dan Remunerasi terhadap anggota Dewan Komisaris dan anggota Direksi.

### Dasar Pembentukan Komite Nominasi dan Remunerasi

Komite Nominasi dan Remunerasi dibentuk berdasarkan peraturan berikut.

1. Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penerapan Tata Kelola bagi Bank Umum;
2. Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penilaian Kesehatan Bank Umum;
3. Peraturan Otoritas Jasa Keuangan No. 4/POJK.03/2016 tanggal 26 Januari 2016 tentang Penilaian Kesehatan Bank Umum;
4. Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 tanggal 7 Desember 2016 tentang Tata Kelola bagi Bank Umum;
5. Peraturan Otoritas Jasa Keuangan No. 8/POJK.04/2015 tanggal 25 Juni 2015 tentang Situs Web Emiten atau Perusahaan Publik;
6. Undang-Undang No. 21 tahun 2011 tanggal 22 November 2011 tentang Otoritas Jasa Keuangan;
7. Undang-Undang No. 6 tahun 2009 tanggal 13 Januari 2009 tentang Penerapan Peraturan Pemerintah Pengganti Undang-Undang No. 2 tahun 2008 tentang Perubahan Kedua atas Undang-Undang No. 23 tahun 1999 tentang Bank Indonesia menjadi Undang-Undang; dan
8. Undang-Undang No. 40 tahun 2007 tanggal 16 Agustus 2007 tentang Perseroan Terbatas.

### Pedoman Komite Nominasi dan Remunerasi

Dalam melaksanakan tugas dan tanggung jawabnya, Komite Nominasi dan Remunerasi telah dilengkapi dengan Pedoman Komite Nominasi dan Remunerasi yang telah disahkan berdasarkan Keputusan Dewan Komisaris No. 003/SK-KOM/09/18 tanggal 20 September 2018 tentang Pedoman Komite Nominasi dan Remunerasi PT Bank Victoria International Tbk.

## Nomination and Remuneration Committee

Nomination and Remuneration Committee is one of the committees formed by and responsible to the Board of Commissioners in assisting the implementation of functions and duties of the Board of Commissioners related to the Nomination and Remuneration of members of the Board of Commissioners and Board of Directors.

### Establishment of the Nomination and Remuneration Committee

Establishment of the Nomination and Remuneration Committee is based on the following regulations.

1. Financial Services Authority Circular No. 13/SEOJK.03/2017 dated 17 March 2017, on Implementation of Governance for Commercial Banks;
2. Financial Services Authority Circular No. 14/SEOJK.03/2017 dated 17 March 2017 on Assessment of Soundness Level of Commercial Banks;
3. Financial Services Authority Regulation No. 4/POJK.03/2016 dated 26 January 2016 on Sound Level Assessment Soundness Level of Commercial Banks;
4. Financial Services Authority Regulation No. 55/POJK.03/2016 dated 7 December 2016, on Governance for Commercial Banks;
5. Financial Services Authority Regulation No. 8/POJK.04/2015 dated 25 June 2015 on Website of Issuers or Public Companies;
6. Law No. 21 of 2011 dated 22 November 2011 on Financial Services Authority;
7. Law No. 6 of 2009 dated 13 January 2009 on the Implementation of Government Regulation in Lieu of Law No. 2 of 2008 on the Second Amendment to Law No. 23 of 1999 on Bank Indonesia; and
8. Law No. 40 of 2007 dated 16 August 2007 on Limited Liability Company.

### Nomination and Remuneration Committee Charter

In performing its duties and responsibilities, the Nomination and Remuneration Committee is equipped with the Nomination and Remuneration Committee Guidelines which was ratified based on the Board of Commissioners' Decision Letter No. 003/SK-KOM/09/18 dated 20 September 2018 on Guidelines of Nomination and Remuneration Committee of PT Bank Victoria International Tbk.

## Tugas dan Tanggung Jawab Komite Nominasi dan Remunerasi

Berikut tugas dan tanggung jawab Komite Nominasi dan Remunerasi Bank beserta realisasinya selama tahun 2021.

## Duties and Responsibilities of the Nomination and Remuneration Committee

The following are duties and responsibilities of the Bank's Nomination and Remuneration Committee, including the realization throughout 2021.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p><b>Terkait Kebijakan Nominasi:</b> Related to Nomination Policy:</p> <p>Menyusun dan memberikan rekomendasi mengenai sistem serta prosedur pemilihan dan/atau penggantian anggota Dewan Komisaris dan Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS.</p> <p>To prepare and provide recommendation on system and procedure of selection and/or replacement of members of Board of Commissioners and Board of Directors to the Board of Commissioners to be proposed to the GMS.</p> <p>Memberikan rekomendasi mengenai calon anggota Dewan Komisaris dan/atau Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS.</p> <p>To provide a recommendation about the candidates for the Board of Commissioners and/or the Board of Directors to the Board of Commissioners to be proposed to the GMS.</p>	<p>Pada tahun 2021, tidak ada pemilihan maupun penggantian Dewan Komisaris maupun Direksi, sehingga tidak terdapat rapat yang membahas hal tersebut.</p> <p>In 2021, there was no selection or replacement of members of the Board of Commissioners and Board of Directors, and thus, no meeting was held to discuss such issue.</p> <p>Pada tahun 2021, tidak ada pemilihan maupun penggantian Dewan Komisaris maupun Direksi, sehingga tidak ada pengusulan calon Dewan Komisaris dan Direksi.</p> <p>In 2021, there was no selection or replacement of members of Board of Commissioners or Board of Directors, and thus, there was no proposal for members of the Board of Commissioners and Board of Directors.</p>
<p><b>Terkait Kebijakan Remunerasi:</b> Related to Remuneration Policy:</p> <p>Menyusun dan mengevaluasi remunerasi kepada anggota Dewan Komisaris, Direksi, dan Pejabat Eksekutif sampai dengan 1 (satu) tingkat di bawah Direksi.</p> <p>To prepare and evaluate the remuneration for members of the Board of Commissioners, Board of Directors, and Executive Officers up to 1 (one) level below the Board of Directors.</p> <p>Memberikan rekomendasi kepada Dewan Komisaris mengenai:</p> <ol style="list-style-type: none"> <li>1. Kebijakan remunerasi bagi Dewan Komisaris dan Direksi untuk disampaikan kepada RUPS; dan</li> <li>2. Kebijakan remunerasi bagi Pejabat Eksekutif sampai dengan 1 (satu) tingkat di bawah Direksi untuk disampaikan kepada Direksi.</li> </ol> <p>To give recommendations to the Board of Commissioners on:</p> <ol style="list-style-type: none"> <li>1. The remuneration policy for the Board of Commissioners and Board of Directors to be proposed to the GMS; and</li> <li>2. The remuneration policy for the Executive Officers up to 1 (one) level below the Board of Directors to be delivered to the Board of Directors.</li> </ol>	<p>Tidak terdapat perubahan remunerasi di tahun 2021, sehingga tidak terdapat rapat yang membahas hal tersebut. Adapun remunerasi Dewan Komisaris pada tahun 2021 sebesar Rp2.409.749.022,- dan Direksi sebesar Rp12.792.853.723,-.</p> <p>The was no change in remuneration in 2021, and therefore, no meeting was held to discuss this issue. Remuneration for the Board of Commissioners in 2021 was Rp2,409,749,022 and for the Board of Directors was Rp12,792,853,723.</p> <p>Tidak terdapat perubahan remunerasi di tahun 2021, sehingga tidak terdapat rapat yang membahas hal tersebut.</p> <p>The was no change in remuneration in 2021, and therefore, no meeting was held to discuss such issue.</p>
<p>Dalam melaksanakan tugas dan tanggung jawab terkait dengan kebijakan remunerasi wajib memperhatikan:</p> <ol style="list-style-type: none"> <li>1. Kinerja keuangan dan pemenuhan cadangan sebagaimana diatur dalam peraturan perundang-undangan yang berlaku;</li> <li>2. Prestasi kerja individu;</li> <li>3. Kewajaran dengan <i>peer group</i>; serta</li> <li>4. Pertimbangan sasaran dan strategi jangka panjang Bank.</li> </ol> <p>In performing duties and responsibilities related to the remuneration policy, the Bank must consider:</p> <ol style="list-style-type: none"> <li>1. Financial performance and fulfillment of the reserve as stipulated in the applicable laws and regulations;</li> <li>2. Individual work achievement;</li> <li>3. Fairness with peer group; and</li> <li>4. Consideration on the Bank's long-term goals and strategies.</li> </ol>	<p>Menyusun remunerasi berdasarkan kinerja keuangan Bank, prestasi kerja individu, kewajaran dengan <i>peer group</i>, serta pertimbangan sasaran dan strategi jangka panjang Bank.</p> <p>Prepared remuneration based on the Bank's financial performance, individual work achievement, fairness with peer froup, and consideration on Bank's long-term goals and strategies.</p>
<p><b>Terkait Tugas Lainnya:</b> Related to Other Duties:</p> <p>Membantu Dewan Komisaris untuk memberikan rekomendasi tentang jumlah anggota Dewan Komisaris dan Direksi.</p> <p>To assist the Board of Commissioners in giving the recommendations about the number of members of the Board of Commissioners and the Board of Directors.</p>	<p>Memberikan rekomendasi jumlah anggota Dewan Komisaris dan Direksi pada rapat 22 Desember 2021.</p> <p>Provided recommendations on remuneration policy to the Board of Commissioners in a meeting held on 22 December 2021.</p>

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Membantu Direksi dalam melakukan pengkajian ulang terhadap sistem <i>Human Capital Management</i> dan kebijakan pengembangan sumber daya manusia mulai dari rekrutmen, asesmen, peningkatan kompetensi, evaluasi, promosi, demosi, terminasi, suksesi, seleksi, dan lain-lain.</p> <p>To assist the Board of Directors in re-assessing the Human Capital Management system and human capital development policy starting from the recruitment, assessment, competency development, evaluation, promotion, demotion, termination, succession, selection, and others.</p>	<p>Membantu Direksi mengkaji ulang sistem <i>Human Capital Management</i> dan kebijakan pengembangan sumber daya manusia.</p> <p>Assisted the Board of Directors in re-assessing Human Capital Management system and human capital development policy.</p>

## Komposisi Komite Nominasi dan Remunerasi

Komite Nominasi dan Remunerasi diangkat dan diberhentikan melalui Surat Keputusan Direksi berdasarkan hasil rapat Dewan Komisaris. Anggota Komite Nominasi dan Remunerasi minimal terdiri dari seorang Komisaris Independen sebagai ketua Komite, seorang Komisaris, dan seorang Pejabat eksekutif yang membawahi Divisi *Human Capital Management*. Para anggota Komite Nominasi dan Remunerasi secara bersama-sama memiliki keseimbangan antara keahlian dan pengalaman dengan latar belakang pemahaman yang luas mengenai bisnis umum dan perbankan secara khusus.

### Periode 26 Juli 2018-Sekarang

Keanggotaan Komite Nominasi dan Remunerasi periode 26 Juli 2018-sekarang yang diangkat berdasarkan Keputusan Direksi No. 007/SK-DIR/07/18 tanggal 26 Juli 2018 sebagai berikut.

## Composition of the Nomination and Remuneration Committee

Nomination and Remuneration Committee is appointed and dismissed by the Board of Directors' Decision Letter based upon Board of Commissioners' meeting outcome. Members of Nomination and Remuneration Committee must at least comprise one Independent Commissioner as the chairperson of the Committee, 1 (one) Commissioner, and 1 (one) Executive Officer in charge of the Human Capital Management Division. Members of the Nomination and Remuneration Committee must all have balanced expertise and experiences with in-depth comprehension regarding business in general and banking sector in particular.

### Period of 26 July 2018-Now

Members of Nomination and Remuneration Committee for the period of 26 July 2018-now were appointed based on the Board of Directors' Decision Letter No. 007/SK-DIR/07/18 dated 26 July 2018 as follows.

Nama Name	Posisi di Komite Position in the Committee	Jabatan di Bank Position at the Bank	Keahlian Expertise
Gunawan Tenggarahardja	Ketua Komite Nominasi dan Remunerasi Chairperson of the Nomination and Remuneration Committee	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	Perbankan Banking
Oliver Simorangkir	Anggota Komite Nominasi dan Remunerasi Member of the Nomination and Remuneration Committee	Komisaris Utama President Commissioner	Bisnis Business
Syahda Candra	Anggota Komite Nominasi dan Remunerasi Member of the Nomination and Remuneration Committee	Kepala Divisi <i>Human Capital Management &amp; General Affair</i> Head of Human Capital Management & General Affair Division	Human Capital

## Independensi Komite Nominasi dan Remunerasi

Seluruh anggota Komite Nominasi dan Remunerasi telah memenuhi semua kriteria independensi dan mampu untuk menjalankan tugasnya secara independen, menjunjung tinggi kepentingan Bank dan tidak dapat dipengaruhi oleh pihak manapun. Berikut informasi pemenuhan aspek independensi anggota Komite Nominasi dan Remunerasi.

## Independency of the Nomination and Remuneration Committee

The entire members of the Nomination and Remuneration Committee have satisfied all independency criteria, are capable of performing their duties independently, uphold the Bank's interest, and cannot be influenced by any party whomsoever. The following is information regarding the fulfillment of the independency aspects of the Nomination and Remuneration Committee members.

Aspek Independensi Independency Aspect	Gunawan Tenggarahardja	Oliver Simorangkir	Syahda Candra
Tidak memiliki hubungan keuangan dengan Dewan Komisaris, Direksi, serta Pemegang Saham Utama dan Pengendali. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders.	✓	✓	✓
Tidak memiliki hubungan kepemilikan saham di Bank, baik secara langsung maupun tidak langsung. Does not have share ownership relationship in the Bank, either directly or indirectly.	✓	✓	✓
Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, maupun perusahaan afiliasi. Does not have management relationship in the Bank, Subsidiary, and affiliated company.	✓	✓	✓
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, Pemegang Saham Utama dan Pengendali, dan/atau sesama anggota Komite Nominasi dan Remunerasi. Does not have family relationship with the Board of Commissioners, Board of Directors, Main and Controlling Shareholders, and/or among members of Nomination and Remuneration Committee.	✓	✓	✓
Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah. Does not hold position as administrator of political party, state, and government.	✓	✓	✓

### Kebijakan Rapat Komite Nominasi dan Remunerasi

Berdasarkan Pedoman Komite Nominasi dan Remunerasi, rapat Komite Nominasi dan Remunerasi diselenggarakan minimal 4 (empat) kali dalam 1 (satu) tahun. Rapat Komite Nominasi dan Remunerasi serta keputusan yang diambil dianggap sah apabila dihadiri minimal 51,00% dari jumlah anggota termasuk seorang Komisaris Independen dan Pejabat Eksekutif.

### Frekuensi dan Kehadiran Rapat Komite Nominasi dan Remunerasi

Pada tahun 2021, informasi frekuensi dan kehadiran rapat Komite Nominasi dan Remunerasi diuraikan sebagai berikut.

### Nomination and Remuneration Committee's Meeting Policy

Based on Nomination and Remuneration Committee Charter, the Nomination and Remuneration Committee must hold at least 4 (four) meetings in 1 (one) year. Nomination and Remuneration Committee's meetings including decisions made will be deemed valid if attended by a minimum of 51.00% of the entire members including one Independent Commissioner and Executive Officer.

### Nomination and Remuneration Committee's Meeting Frequency and Attendance

Information regarding Nomination and Remuneration Committee's meeting frequency and attendance in 2021 is as listed below.

Tanggal Date	Agenda	Gunawan Tenggarahardja	Oliver Simorangkir	Syahda Candra
8 Januari 2021 8 January 2021	Struktur organisasi Bank. Bank's Organizational Structure.	✓	✓	✓
6 April 2021	Penggantian anggota Komite Audit dan anggota Komite Pemantau Risiko. Replacement of members of Audit Committee and members of the Risk Monitoring Committee.	✓	✓	✓
8 Oktober 2021 8 October 2021	Penggantian anggota Komite Audit dan anggota Komite Pemantau Risiko. Replacement of members of Audit Committee and members of Risk Monitoring Committee.	✓	✓	✓
29 Oktober 2021 29 October 2021	Penerimaan <i>SEVP of Operations &amp; International Banking</i> . Recruitment of <i>SEVP of Operations &amp; International Banking</i> .	✓	✓	✓
10 November 2021	Penerimaan <i>Advisor of Finance, Accounting &amp; Strategic Performance Management</i> . Recruitment of <i>Advisor of Finance, Accounting &amp; strategic Performance Management</i> .	✓	✓	✓
22 Desember 2021 22 December 2021	Evaluasi komposisi Direksi dan Pejabat Eksekutif. Evaluation of the composition of Board of Directors and Executive Officers.	✓	✓	✓



Tanggal Date	Agenda	Gunawan Tenggarahardja	Oliver Simorangkir	Syahda Candra
<b>Total Kehadiran dalam Rapat</b> Total Meeting Attendance		<b>6</b>	<b>6</b>	<b>6</b>
<b>Total Rapat</b> Total Meetings		<b>6</b>	<b>6</b>	<b>6</b>
<b>Tingkat Kehadiran (%)</b> Attendance Rate (%)		<b>100.00</b>	<b>100.00</b>	<b>100.00</b>
<b>Rata-rata Kehadiran (%)</b> Attendance Average (%)			<b>100.00</b>	

### Laporan Singkat Pelaksanaan Kegiatan Komite Nominasi dan Remunerasi Tahun 2021

Pada tahun 2021, Komite Nominasi dan Remunerasi telah melakukan penelaahan dan peninjauan, baik melalui analisa laporan maupun melalui rapat yang hasilnya disampaikan kepada Dewan Komisaris, antara lain:

1. Pengkinian struktur organisasi;
2. Penggantian anggota Komite Audit dan Komite Pemantau Risiko;
3. Penerimaan *SEVP of Operations & International Banking*;
4. Penerimaan *Advisor of Finance, Accounting & Strategic Performance Management*; dan
5. Evaluasi komposisi Direksi dan Pejabat Eksekutif.

## Komite Audit

Komite Audit merupakan organ pendukung Dewan Komisaris yang berperan dalam melakukan audit internal. Komite Audit bekerja secara kolektif dan memiliki wewenang untuk melakukan koordinasi dengan tim audit internal Bank, atas izin Dewan Komisaris.

### Dasar Pembentukan Komite Audit

Pembentukan Komite Audit Bank mengacu pada peraturan berikut.

1. Surat Edaran Otoritas Jasa Keuangan No. 36/SEOJK.03/2017 tanggal 11 Juli 2017 tentang Tata Cara Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan;
2. Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tanggal 17 Maret 2017 tentang Penerapan Tata Kelola bagi Bank Umum;
3. Peraturan Otoritas Jasa Keuangan No. 13/POJK.03/2017 tanggal 27 Maret 2017 tentang Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan;
4. Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 tanggal 7 Desember 2016 tentang Penerapan Tata Kelola bagi Bank Umum;

### Brief Report of Nomination and Remuneration Committee's Activities In 2021

In 2021, the Nomination and Remuneration Committee conducted review and study, both through analysis of reports and through meetings, the results of which are submitted to the Board of Commissioners, among others:

1. Updating the organizational structure;
2. Replacing members of Audit Committee and Risk Monitoring Committee;
3. Recruiting SEVP of Operations & International Banking;
4. Recruiting Advisors of Finance, Accounting & Strategic Performance Management; and
5. Evaluating the composition of the Board of Directors and Executive Officers.

## Audit Committee

Audit Committee is Board of Commissioners' supporting organ having the role to perform internal audit. Audit Committee works collectively and holds the authority to coordinate with the Bank's internal audit team, upon permit granted by the Board of Commissioners.

### Basis of Audit Committee Establishment

The establishment of the Bank's Audit Committee refers to the following regulations.

1. Financial Services Authority Circular No. 36/SEOJK.03/2017 dated 11 July 2017 on Procedures for Using Services of Public Accountant and Public Accounting Firm in the Activities of Financial Services;
2. Financial Services Authority Circular No. 13/ SEOJK.03/2017 dated 17 March 2017 on Implementation of Governance for Commercial Banks;
3. Financial Services Authority Regulation No. 13/POJK.03/2017 dated 27 March 2017 on the Use of Public Accountant Services and Public Accounting Firm in Financial Services Activities;
4. Financial Services Authority Regulation No. 55/POJK.03/2016 dated 7 December 2016 on Implementation of Governance for Commercial Banks;



5. Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 tanggal 23 Desember 2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit; serta
6. Peraturan Otoritas Jasa Keuangan No. 33/POJK.04/2014 tanggal 8 Desember 2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik.

### Pedoman Komite Audit

Dalam melaksanakan tugas dan tanggung jawabnya Komite Audit berpedoman pada Piagam dan Pedoman Kerja Komite Audit. Piagam dan Pedoman tersebut disusun sesuai peraturan dan perundang-undangan yang berlaku, serta telah dimutakhirkan melalui Keputusan Dewan Komisaris No. 002/SK-KOM/09/20 tanggal 25 September 2020 tentang Piagam dan Pedoman Kerja Komite Audit PT Bank Victoria International Tbk.

### Tugas dan Tanggung Jawab Komite Audit

Berikut tugas dan tanggung jawab Komite Audit beserta realisasinya.

5. Financial Services Authority Regulation No. 55/POJK.04/2015 dated 23 December 2015 on Establishment and Guideline for Work Implementation of Audit Committee; and
6. Financial Services Authority Regulation No. 33/POJK.04/2014 dated 8 December 2014 on Board of Directors and Board of Commissioners of Issuers or Public Companies.

### Audit Committee Charter

In carrying out its duties and responsibilities, the Audit Committee refers to Audit Committee Charter and Work Guidelines. Such Charter and Guidelines were made in accordance with the applicable laws and regulations, and was ratified under the Board of Commissioners' Decision Letter No. 002/SK-KOM/09/20 dated 25 September 2020 on the Charter and Work Guidelines of Audit Committee of PT Bank Victoria International Tbk.

### Duties and Responsibilities of the Audit Committee

Duties and responsibilities of the Audit Committee including the realization are as follows.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Penelaahan dan klarifikasi atas informasi keuangan. Review and clarify the financial information.</p>	<p>Melaksanakan penelaahan dan peninjauan, baik melalui laporan maupun melalui rapat yang hasilnya disampaikan kepada Dewan Komisaris, seperti:</p> <ol style="list-style-type: none"> <li>1. Penelaahan Laporan Keuangan serta pengendalian internal posisi Desember 2020;</li> <li>2. Penelaahan tren pertumbuhan kinerja usaha periode Maret 2021 dan Pencapaian Rencana Bisnis Bank triwulan I 2021;</li> <li>3. Penelaahan tren pertumbuhan kinerja usaha periode Juni 2021 dan pencapaian Rencana Bisnis Bank triwulan II 2021;</li> <li>4. Penelaahan tren pertumbuhan kinerja usaha periode September 2021 dan pencapaian Rencana Bisnis Bank triwulan III 2021.</li> </ol> <p>Reviewing and studying, through reports and meetings whose results were submitted to the Board of Commissioners, such as:</p> <ol style="list-style-type: none"> <li>1. Review of Financial Statements and internal control for December 2020 position;</li> <li>2. Review of business performance growth trend for March 2021 period and Bank Business Plan achievement quarter I 2021;</li> <li>3. Review of business performance growth trend for June 2021 period and Bank Business Plan achievement quarter II 2021;</li> <li>4. Review of business performance growth trend for September 2021 period and Bank Business Plan achievement quarter III 2021;</li> </ol>
<p>Seleksi, penunjukan, dan pengawasan pekerjaan auditor independen. Select, appoint, and monitor the work of the independent auditor.</p>	<p>Menunjuk Kantor Akuntan Publik Purwanto, Sungkoro &amp; Surja sebagai auditor independen. Appointing Public Accounting Firm Purwanto, Sungkoro &amp; Surja as the independent auditor.</p>
<p>Evaluasi efektivitas pelaksanaan pekerjaan auditor independen. Evaluating the effectiveness of implementation of independent auditor function.</p>	<p>Mengevaluasi efektivitas pekerjaan auditor independen dan menyampaikan hasil evaluasinya kepada Dewan Komisaris. Evaluating the effectiveness of independent auditor work and submitting the evaluation results to the Board of Commissioners.</p>
<p>Evaluasi efektivitas pelaksanaan fungsi audit internal. Evaluate the effectiveness of implementation of internal audit function.</p>	<p>Melakukan penelaahan dan klarifikasi atas evaluasi efektivitas pelaksanaan fungsi audit internal. Reviewing and clarifying the evaluation of effectiveness of internal audit function implementation.</p>
<p>Efektivitas pengendalian internal. Effectiveness of internal control.</p>	<p>Memberikan rekomendasi untuk meningkatkan aktivitas pengendalian internal di masing-masing Unit Kerja, seperti Divisi di kantor pusat, kantor cabang/cabang pembantu/kantor kas. Providing recommendations for increasing internal control activities in each work unit, such as Divisions at head office, branch offices/sub-branch offices/cash offices.</p>
<p>Kepatuhan terhadap peraturan perundang-undangan. Compliance with laws and regulations.</p>	<p>Memastikan kepatuhan Bank terhadap peraturan perundang-undangan. Ensuring the Bank's compliance with laws and regulations.</p>

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
Manajemen risiko. Risk management.	Meningkatkan implementasi sistem manajemen risiko dilakukan melalui peningkatan fungsi identifikasi, pengukuran, pemantauan, dan pengendalian risiko Bank guna mencegah atau meminimalkan kerugian yang timbul dari kegiatan Bank ataupun mencegah hal-hal yang dapat mengganggu kelangsungan Bank.  Improving risk management system by improving the identification, measurement, monitoring, and control functions of the Bank's risks in order to prevent or minimize losses arising from the Bank's activities or to prevent matters that may disrupt the Bank's continuity.
Penilaian sendiri pelaksanaan tugas Komite Audit. Self-assessment of the implementation of Audit Committee's duties.	Mengawasi hal-hal yang terkait dengan informasi keuangan, sistem pengendalian internal, serta efektivitas pemeriksaan oleh auditor internal dan eksternal. Pada tahun 2021, Dewan Komisaris menilai kinerja Komite Audit telah efektif dan sesuai dengan Piagam Komite Audit.  Supervising matters related to financial information, internal control system, and auditing effectiveness performed by internal and external auditors. In 2021, the Board of Commissioners considers that the Audit Committee's performance was already effective and in accordance with the Audit Committee Charter.

### Komposisi Komite Audit

Komite Audit terdiri dari 1 (satu) orang Komisaris Independen sebagai Ketua dan 2 (dua) orang pihak independen dengan kompetensi dan kualifikasi di bidang keuangan, hukum, dan perbankan. Masing-masing anggota Komite Audit diangkat dan diberhentikan melalui Surat Keputusan Direksi berdasarkan hasil rapat Dewan Komisaris setelah mendapat rekomendasi dari Komite Nominasi dan Remunerasi.

Untuk anggota Komite Audit yang merangkap sebagai anggota Dewan Komisaris, masa jabatannya sama dengan masa kerja penunjukan sebagai anggota Dewan Komisaris yang ditentukan oleh RUPS. Sedangkan untuk Komite Audit yang bukan merupakan anggota Dewan Komisaris, masa jabatannya tidak lebih lama dari masa jabatan Dewan Komisaris dengan tidak mengurangi hak Dewan Komisaris untuk memberhentikan.

Adapun syarat menjadi anggota Komite Audit adalah memiliki integritas, akhlak, dan moral yang baik, serta harus memiliki pemahaman yang relevan dan signifikan dengan bisnis Bank.

#### Periode 13 September 2019-8 April 2021

Berdasarkan Keputusan Direksi No. 006/SK-DIR/09/19 tanggal 13 September 2019, struktur dan keanggotaan Komite Audit periode 13 September 2019-8 April 2021 diuraikan sebagai berikut.

### Audit Committee Composition

The Audit Committee consists of 1 (one) Independent Commissioner as Chairman and 2 (two) independent parties with competencies and qualifications in finance, legal, and banking. Each member of the Audit Committee is appointed and dismissed under a Board of Directors' Decision Letter based on the results of the Board of Commissioners' meeting after receiving recommendation from the Nomination and Remuneration Committee.

Audit Committee members who also serve as Board of Commissioners' members have the same term as the appointment term as a member of the Board of Commissioners determined by the GMS. As for the Audit Committee members who are not members of the Board of Commissioners, the term of office is not longer than the term of office of the Board of Commissioners without prejudice to the Board of Commissioners' right to dismiss.

The requirements to become a member of the Audit Committee are having good integrity, character, and morals, and must have relevant and significant understanding of the Bank's business.

#### Period of 13 September 2019-8 April 2021

Based on the Board of Directors' Decision Letter No. 006/SK-DIR/09/19 dated 13 September 2019, the structure of Audit Committee members for the period of 13 September 2019-8 April 2021 is as described below.

Nama Name	Posisi di Komite Position in the Committee	Jabatan di Bank Position at the Bank	Keahlian Expertise
Gunawan Tenggarahardja	Ketua Komite Audit Chairman of Audit Committee	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	Perbankan Banking
Retno Dwijanti Widaningsih	Anggota Komite Audit Member of Audit Committee	Pihak Independen Independent Party	Perbankan dan Audit Banking and Audit
Yozef Abdulrachman	Anggota Komite Audit Member of Audit Committee	Pihak Independen Independent Party	Manajemen Risiko dan Perbankan Risk Management and Banking

**Periode 8 April 2021-26 Oktober 2021**

Berdasarkan Keputusan Direksi No. 004/SK-DIR/04/21 tanggal 8 April 2021, struktur dan keanggotaan Komite Audit diuraikan sebagai berikut.

**Period of 8 April 2021-26 October 2021**

Based on the Board of Directors' Decision Letter No. 004/SK-DIR/04/21 dated 8 April 2021, the structure of Audit Committee members is as described below.

<b>Nama Name</b>	<b>Posisi di Komite Position in the Committee</b>	<b>Jabatan di Bank Position at the Bank</b>	<b>Keahlian Expertise</b>
Gunawan Tenggarahardja	Ketua Komite Audit Chairman of Audit Committee	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	Perbankan Banking
Ignace Widiatmoko	Anggota Komite Audit Member of Audit Committee	Pihak Independen Independent Party	Perbankan dan Audit Banking and Audit
Yozef Abdulrachman	Anggota Komite Audit Member of Audit Committee	Pihak Independen Independent Party	Manajemen Risiko dan Perbankan Risk Management and Banking

**Periode 26 Oktober 2021-Sekarang**

Berdasarkan Keputusan Direksi No. 007/SK-DIR/10/21 tanggal 26 Oktober 2021, struktur dan keanggotaan Komite Audit diuraikan sebagai berikut.

**Period of 26 October 2021-Now**

Based on Board of Directors' Decision Letter No. 007/SK-DIR/10/21 dated 26 October 2021, the Audit Committee's structure and composition is as follows.

<b>Nama Name</b>	<b>Posisi di Komite Position in the Committee</b>	<b>Jabatan di Bank Position at the Bank</b>	<b>Keahlian Expertise</b>
Gunawan Tenggarahardja	Ketua Komite Audit Chairman of Audit Committee	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	Perbankan Banking
Medi Sejati	Anggota Komite Audit Member of Audit Committee	Pihak Independen Independent Party	Perbankan dan Audit Banking and Audit
Yozef Abdulrachman	Anggota Komite Audit Member of Audit Committee	Pihak Independen Independent Party	Manajemen Risiko dan Perbankan Risk Management and Banking

**Independensi Komite Audit**

Seluruh anggota Komite Audit telah memenuhi semua kriteria independensi dan mampu untuk menjalankan tugasnya secara independen, menjunjung tinggi kepentingan Bank, dan tidak dapat dipengaruhi oleh pihak manapun. Hal ini dapat dilihat dari aspek independensi yang telah dipenuhi oleh seluruh anggota Komite Audit, yang diuraikan sebagai berikut.

**Independency of the Audit Committee**

The entire members of the Audit Committee have satisfied all independency criteria and are capable of performing their duties independently, and uphold the Bank's interest and cannot be influenced by any party whomsoever. This can be seen in the independency aspects fulfilled by the entire Audit Committee members as described below.

<b>Aspek Independensi Independency Aspect</b>	<b>Gunawan Tenggarahardja</b>	<b>Medi Sejati*</b>	<b>Ignace Widiatmoko**</b>	<b>Retno Dwijanti Widaningsih***</b>	<b>Yozef Abdulrachman</b>
Tidak memiliki hubungan keuangan dengan Dewan Komisaris, Direksi, serta Pemegang Saham Utama dan Pengendali. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders.	✓	✓	✓	✓	✓
Tidak memiliki hubungan kepemilikan saham di Bank, baik secara langsung maupun tidak langsung. Does not have share ownership relationship in the Bank, either directly or indirectly.	✓	✓	✓	✓	✓

Aspek Independensi Independency Aspect	Gunawan Tenggarahardja	Medi Sejati*	Ignace Widiatmoko**	Retno Dwijanti Widaningsih***	Yozef Abdulrachman
Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, maupun perusahaan afiliasi. Does not have management relationship in the Bank, Subsidiary, and affiliated company.	✓	✓	✓	✓	✓
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, Pemegang Saham Utama dan Pengendali, dan/atau sesama anggota Komite Audit. Does not have family relationship with the Board of Commissioners, Board of Directors, Main and Controlling Shareholders, and/or among members of Audit Committee.	✓	✓	✓	✓	✓
Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah. Does not hold position as administrator of political party, state, and government.	✓	✓	✓	✓	✓

\* Menjabat sejak 26 Oktober 2021.

\*\* Menjabat sejak 8 April 2021 sampai 26 Oktober 2021.

\*\*\* Menjabat sampai 8 April 2021.

\* Holding the position since 26 October 2021.

\*\* Holding the position from 8 April 2021 to 26 October 2021.

\*\*\* Holding the position until 8 April 2021.

### Evaluasi dan Rekomendasi Komite Audit dalam Penunjukan Kantor Akuntan Publik

Terkait dengan pelaksanaan pemberian jasa audit atas informasi keuangan historis tahunan Bank tahun 2020 oleh Kantor Akuntan Publik Tanudiredja, Wibisana dan Rekan, maka Komite Audit telah melaksanakan evaluasi terhadap pemberian jasa tersebut dengan kesimpulan sebagai berikut.

#### 1. Kesesuaian Pelaksanaan Audit dengan Standar Akuntansi yang Berlaku

Ruang lingkup pekerjaan adalah melakukan audit posisi keuangan (neraca), tahun buku yang berakhir pada 31 Desember 2020, laporan laba rugi komprehensif, laporan perubahan ekuitas, dan laporan arus kas sesuai dengan standar akuntansi keuangan yang berlaku di Indonesia.

Hasil evaluasi menunjukkan pekerjaan audit telah dilaksanakan berdasarkan *standard auditing* versi Institut Akuntan Publik Indonesia, sehingga secara etika auditor dalam menjalankan proses auditnya mematuhi standar pelaksanaan audit, dan dalam memperoleh keyakinan disertai bukti-bukti yang memadai sehingga bebas dari salah saji secara material.

Auditor juga telah mempertimbangkan risiko salah saji, baik yang disebabkan oleh kesalahan ataupun kecurangan dengan memperhatikan proses pengendalian internal yang diterapkan oleh manajemen Bank dan konfirmasi yang secara intens dilakukan setiap terdapat temuan, yang didiskusikan dengan melibatkan anggota Komite Audit. Hal ini memberikan gambaran bahwa transparansi dan proses audit yang dilakukan telah berjalan sesuai harapan Dewan Komisaris.

### Audit Committee's Evaluation and Recommendation in Appointing Public Accounting Firm

Related to the implementation of audit services on the Bank's annual historical financial information of 2020 by Public Accounting Firm Tanudiredja, Wibisana & Partner, the Audit Committee conducted an evaluation of the provision of services with the following conclusion.

#### 1. Conformity of Audit with the Applicable Accounting Standards

The work scope is to perform auditing on financial position (balance sheet), for the fiscal year ended 31 December 2020, comprehensive statements of profit or loss, statements of changes in equity, and statements of cash flows according to the financial accounting standards applicable in Indonesia.

The evaluation results show that the audit work has been carried out based on the auditing standards of the Indonesian Institute of Certified Public Accountants, and therefore, ethically in carrying out the audit process, the auditor has complied with the standard of audit implementation, and in obtaining assurance, it is completed with sufficient evidence so that it is free of material misstatement.

The auditor has also considered the risk of misstatement, whether caused by error or fraud, by paying attention to the internal control process applied by the Bank's management and by intense confirmation of any findings, which are discussed by involving members of Audit Committee. This provides an illustration that the transparency and audit process carried out are as expected by the Board of Commissioners.

2. Kecukupan Waktu Pekerjaan Lapangan

Pekerjaan yang dimulai sejak surat penugasan pekerjaan, yang ditandatangani oleh Direksi pada tanggal 7 Oktober 2020 dapat diselesaikan sampai dengan penyerahan laporan pada minggu ke 4 (empat) bulan April 2020 adalah waktu yang cukup memadai dan sesuai dengan skala, area usaha, serta kompleksitas bisnis Bank. Dengan demikian, memberikan cukup waktu bagi Bank untuk memperhitungkan kewajiban perpajakan dan laporan lain yang diperlukan.

3. Pengkajian Cakupan Jasa yang Diberikan dan Kecukupan Uji Petik

a. Cakupan jasa audit

Auditor melakukan evaluasi terhadap pengendalian internal Bank sebagai dasar melakukan *general audit*. Hasil evaluasi secara umum baik, merekomendasi perbaikan dalam peningkatan pengendalian internal yang harus diperbaiki Bank.

1) Laporan Keuangan Konsolidasi 31 Desember 2020

- Mengaudit Laporan Keuangan Konsolidasian Bank per 31 Desember 2020, laporan laba rugi, laporan perubahan ekuitas, dan laporan arus kas untuk tahun yang berakhir pada tanggal tersebut;
- Melakukan tinjauan ulang pelaksanaan pengendalian internal Bank;
- Melakukan tinjauan ulang penggolongan kualitas aset produktif dan perhitungan penyisihan penghapusan aset produktif (PPAP), serta kecukupan cadangan atas *loan impairment* dengan melakukan kajian ulang perhitungan secara individual dan kolektif dan juga perhitungan *loss given default* (LGD);
- Melakukan kajian investasi pada surat-surat berharga, serta perlakuan akuntansi dan pencatatan klasifikasi maupun valuasinya;
- Melakukan tinjauan ulang kewajaran transaksi dengan pihak-pihak berelasi dan transaksi penyediaan dana kepada pihak terkait;
- Melakukan kajian pengakuan pendapatan, termasuk melakukan *test* dan *proof sheet* atas perhitungan besaran *effective interest rate* (EIR) dan lain-lain;
- Melakukan pemeriksaan batas maksimum pemberian kredit (BMPK);
- Melakukan kajian agunan yang diambil alih (AYDA), termasuk evaluasi *action plan* penyelesaiannya dan perhitungan kecukupan pencadangan berdasarkan asumsi 1,5 tahun terjual;
- Melakukan kajian dana pihak ketiga, dengan melakukan verifikasi buku besar di neraca dan biaya bunga serta melakukan konfirmasi;

2. Adequacy of Field Work Time

The work started on the date of the assignment letter signed by the Board of Directors on 7 October 2020 and completed on the submission of the report on the 4th (fourth) week of April 2020, and therefore, the time given was adequate and appropriate with the Bank's business scale, business area, and complexity. Thus, providing sufficient time for the Bank to calculate tax obligations and other required reports.

3. Review of Coverage of Services Provided and Adequacy of Sampling Test

a. Scope of audit services

Auditor evaluates the Bank's internal control as a basis to perform general audit. Evaluation result is generally good, recommending improvement on the internal control to be achieved by the Bank.

1) Consolidated Financial Statements 31 December 2020

- Auditing the Bank's Consolidated Financial Statements as of 31 December 2020, statements of profit or loss, statements of changes in equity, and statements of cash flows for the year ended on such date;
- Reviewing the implementation of Bank's internal control;
- Reviewing the categorization of earning assets quality and calculation of allowance for earning assets losses (PPAP), and adequate reserves on loan impairment, by performing the calculation review individually and collectively and also the calculation of loss given default (LGD);
- Conducting review of investment in marketable securities, including the accounting treatment, recording of classification, and valuation;
- Reviewing the fairness of transaction with related parties and fund provision transactions to related parties;
- Reviewing revenue recognition, including to conduct test and proof on sheet regarding the calculation on effective interest rate (EIR), etc.;
- Monitoring the audit of legal lending limit (LLL);
- Reviewing the foreclosed assets, including evaluation of action plan and the settlement and calculation of adequacy of reserves based on the assumption that they will be sold in 1.5 years;
- Reviewing third-party deposits by verifying the ledger in the balance sheet and interest expenses and making confirmation;

- Mengkaji ulang perhitungan aset tertimbang menurut risiko (ATMR) dan perhitungan kewajiban penyediaan modal minimum (KPMM) Bank;
  - Melakukan pemeriksaan transaksi spot dan derivatif;
  - Mengkaji ulang perhitungan Posisi Devisa Neto (PDN);
  - Melakukan pemeriksaan dan rekonsiliasi jurnal manual, buku besar dan penyesuaian yang dilakukan, mengingat masih adanya jurnal manual yang berpotensi terjadinya penyimpangan/kecurangan;
  - Melakukan kajian keandalan sistem informasi pelaporan Bank;
  - Melakukan kajian atas Entitas Anak, Bank Victoria Syariah, terutama hal yang signifikan, seperti kecukupan cadangan pembiayaan dan amortisasi *fee* dan biaya transaksi.
- 2) Kecukupan Pencadangan (CKPN)  
Kecukupan Pencadangan (CKPN) untuk Kredit, AYDA, dan Surat Berharga telah memadai.
- 3) Investasi dalam saham PT Bima Multi Finance  
Nilai buku investasi dalam saham PT Bima Multi Finance telah sesuai dengan evaluasi yang dilakukan oleh Kantor Jasa Penilai Publik independen.
- b. Kecukupan Uji Petik  
Dalam uji petik yang dilakukan oleh auditor, nilai sampel pemeriksaan kredit sebesar Rp10.527.361 miliar atau sebesar 77,00% dibandingkan dengan total portofolio kredit, sehingga hal ini telah memenuhi ketentuan minimal sebesar 70,00% dan telah mencakup 44 nasabah terbesar. Sedangkan, berdasarkan jumlah sampel yang diperiksa sebanyak 129 *account*.
- Selain itu, pada *account* restrukturisasi, Auditor melakukan pemeriksaan terhadap 46 *account* sebesar Rp2.415.457 miliar yang termasuk dalam *account* di atas.
4. Rekomendasi perbaikan yang diberikan oleh Akuntan Publik dan/atau Kantor Akuntan Publik  
Berdasarkan hasil audit, maka direkomendasikan perbaikan pengendalian internal serta koreksi posisi keuangan untuk menyesuaikan dengan kebijakan akuntansi yang berlaku, sebagaimana yang wajib dilaporkan oleh Akuntan Publik kepada Otoritas Jasa Keuangan.
- Secara umum rekomendasi perbaikan yang diperlukan dalam peningkatan pengendalian internal antara lain:
- a. Pada bidang perkreditan yang perlu disempurnakan dengan menekankan fungsi pengawasan atasan langsung, pelaksanaan dan pelaporan *call visit* dan dokumentasi *call report*, *maintaining* data agunan
- Reviewing the risk weighted assets (RWA) calculation and Capital Adequacy Ration (CAR) calculation of the Bank;
  - Performing check on spot and derivative transactions;
  - Reviewing the calculation of Net Open Position (PDN);
  - Conducting the audit and reconciliation of manual journals, ledgers, and adjustments made, since there are manual journals that have the potential for irregularities/fraud;
  - Reviewing the reliability of the Bank's reporting information system;
  - Conducting review of Subsidiary, Bank Victoria Syariah, particularly on significant matters, such as the adequacy of financing reserves, fee amortization, and transaction charges.
- 2) Allowance for Impairment Losses (CKPN)  
Allowance for Impairment Losses (CKPN) for Credit, Foreclosed Assets, and Marketable Securities is already adequate.
- 3) Investments in shares of PT Bima Multi Finance  
The book value of investment in shares of PT Bima Multi Finance is already in accordance with the evaluation conducted by the independent Public Appraisal Service Office.
- b. Adequacy of Sampling Test  
In the sampling test conducted by the auditor, the sampling value for loan audit was at Rp10,527,361 billion or 77.00% compared to the total loan portfolio, and therefore, this has fulfilled the minimum provision of 70.00% and has covered 44 top customers. Whereas, based on the number of samplings, there were a total of 129 accounts for sampling.
- Furthermore, on restructuring accounts, the Auditor audited 46 accounts at the amount of Rp2,415,457 billion, which included in the above-mentioned accounts.
4. Recommendations for improvement submitted by the Public Accountant and/or Public Accounting Firm  
Based on the audit results, internal control improvement and financial position correction are recommended to be adjusted to the applicable accounting policies, as required to be reported by the Public Accountant to the Financial Services Authority.
- In general, the recommendations for improving internal control include:
- a. In the loan sector, matters need to be improved are emphasizing direct superior monitoring, implementing and reporting call visit and documenting call visit, maintaining collateral data in a nominative list and



dalam daftar *nominative* dan sistem *corebanking* (*Alphabits*); ketentuan penggunaan 3 (tiga) pilar; *monitoring* dokumen kredit; proses restrukturisasi kredit; analisa dan perhitungan cadangan kerugian nilai kredit – kolektif. Temuan ini konsisten dengan hasil temuan audit tahun sebelumnya; dan

- b. Dalam hal Teknologi Informasi (TI) yang perlu mendapat perhatian dari Manajemen adalah pengkinian *rate* di sistem yang harus sesuai dengan Surat Edaran/Surat Keputusan Direksi yang berlaku dan perbaikan sistem PSAK 71.

Terkait dengan penggunaan jasa kantor akuntan publik dan akuntan publik yang mengaudit informasi keuangan historis tahunan Bank posisi tahun 2021, Komite Audit telah merekomendasikan penggunaan jasa Kantor Akuntan Publik Purwanto, Sungkoro & Surja dengan pertimbangan sebagai berikut.

1. Independensi Kantor Akuntan Publik, Akuntan Publik dan Tim Audit

Sebagaimana standar independensi kantor akuntan publik yang terafiliasi pada Kantor Akuntan Publik Purwanto, Sungkoro & Surja, dikenal adanya Kode Etik dan benturan kepentingan, sehingga secara profesional pengaturan internal dari kantor akuntan publik telah menyatakan bahwa tidak ada hubungan istimewa antara pihak pemeriksa dengan terperiksa, yang dapat mempengaruhi independensinya.

Demikian pula dari penelusuran Komite Audit, tidak ditemukan hubungan antara pengurus Bank, pejabat eksekutif Bank dan pihak lain yang berkepentingan yang dapat mempengaruhi independensi dan pendapat akhir dari hasil pemeriksaan, sehingga independensi ini dapat diyakini.

2. Ruang Lingkup Audit

- a. Uji petik dokumen yang diperiksa, minimal 70,00% dari nilai nominal setiap jenis aset keuangan dan mencakup minimal 25 debitur terbesar atau berdasarkan hasil komunikasi antara Otoritas Jasa Keuangan sektor Perbankan dengan Akuntan Publik;
- b. Penggolongan kualitas aset produktif dan perhitungan Penyisihan Penilaian Kualitas Aset (PPKA) sebagaimana diatur dalam ketentuan peraturan perundang-undangan yang berlaku;
- c. Melakukan penilaian terhadap AYDA, proses dan nilai wajarnya, termasuk kecukupan pencadangan kerugiannya;
- d. Penilaian terhadap rupa-rupa aset;
- e. Kewajaran transaksi dengan pihak-pihak berelasi maupun transaksi yang dilakukan dengan perlakuan khusus;
- f. Jumlah dan kualitas penyediaan dana kepada pihak terkait;
- g. Investasi sementara dalam hal penyelesaian kredit bermasalah PT Bima Multi Finance;

core banking system (*Alphabits*); provisions to use 3 (three) pillars; monitoring loan documents, loan restructuring process, analysis and calculation of allowance for impairment losses for collective credit. These findings are consistent with previous year's audit findings; and

- b. In terms of Information Technology (IT), matters requiring Management's attention are updating rate in the system that must be in accordance with the applicable Board of Directors' Circular/ Decision Letter and improvement of PSAK 71 system.

In relation to the use the services of a public accounting firm and public accountant that will audit the Bank's annual historical financial information of 2021, the Audit Committee has recommended using Public Accounting Firm Purwanto, Sungkoro & Surja under the following considerations.

1. Independence of Public Accounting Firm, Public Accountant, and Audit Team

The independence standards of public accounting firm affiliated with Public Accounting Firm Purwanto, Sungkoro & Surja recognize Code of Ethics and conflict of interest, and therefore, professionally the internal arrangement of the public accounting firm states that there is no special relationship between the auditor and the auditee that may affect its independence.

Similarly, the tracing conducted by the Audit Committee did not find any relationship between the Bank's management, the Bank's executive officers, and any other parties concerned that may affect the independence and final opinion on the audit results, and thus, the independence is assured.

2. Audit Scope

- a. The document sampling test covers of at least 70.00% of the nominal value of each type of financial assets and includes at least the 25 biggest debtors or based on the results of communication between the Financial Services Authority in the Banking sector and the Public Accountant;
- b. Classification of earning assets quality and calculation of Allowance for Asset Quality Assessment (PPAP) as regulated in the provisions of the applicable laws and regulations;
- c. Assessment of Foreclosed Asset, the process and fair value, including the adequacy of allowance for its losses;
- d. Assessment of different forms of assets;
- e. Fairness of transactions with related parties or transactions made with special treatment;
- f. Amount and quality of provision of funds to related parties;
- g. Temporary investment in the settlement of non-performing loans of PT Bima Multi Finance;



- h. Rincian pelanggaran Batas Maksimum Pemberian Kredit (BMPK) sebagaimana diatur dalam ketentuan perundang-undangan yang berlaku;
- i. Rincian pelampauan BMPK sebagaimana diatur dalam ketentuan perundang-undangan yang berlaku;
- j. Perhitungan ATMR sebagaimana diatur dalam peraturan perundang-undangan yang berlaku;
- k. Perhitungan KPMM sebagaimana diatur dalam peraturan perundang-undangan yang berlaku;
- l. Transaksi spot dan transaksi derivatif;
- m. Rasio PDN sebagaimana diatur dalam peraturan perundang-undangan yang berlaku;
- n. Keandalan sistem informasi pelaporan Bank;
- o. *High level review* pajak;
- p. Perhitungan aktuaria;
- q. Hal-hal lain yang ditentukan berdasarkan hasil komunikasi Otoritas Jasa Keuangan dengan kantor akuntan publik sebagaimana dimaksud dalam Pasal 19 Peraturan Otoritas Jasa Keuangan tentang Akuntan Publik dan Kantor Akuntan Publik; serta
- r. Hal-hal lain yang diatur dalam standar akuntansi keuangan dan peraturan terkait akuntansi yang diterbitkan oleh Otoritas Jasa Keuangan.
- h. Details of Legal Lending Limit (LLL) excess as stipulated in the applicable laws and regulations;
- i. Details of LLL excess as stipulated in the applicable laws and regulations;
- j. RWA calculation as stipulated in the applicable laws and regulations;
- k. CAR calculation as stipulated in applicable laws and regulations;
- l. Spot and derivative transactions;
- m. PDN ratio as stipulated in applicable laws and regulations;
- n. Reliability of Bank reporting information system;
- o. High level tax review;
- p. Actuarial calculation;
- q. Other matters determined based on the communication results between the Financial Services Authority and the public accounting firm as referred to in Article 19 of the Financial Services Authority Regulation on Public Accountant and Public Accounting Firm; and
- r. Other matters stipulated in the financial accounting standards and accounting-related regulations issued by the Financial Services Authority.
3. Imbalan Jasa Audit  
Kenaikan besaran *fee* telah memperhitungkan kenaikan inflasi, meskipun ruang lingkup pekerjaan relatif tetap, agar Bank memperhitungkan dengan kewajaran dan ruang lingkup pekerjaan.
3. Audit Services Fee  
The increase in fee amount has considered the increase in inflation although the work scope is relatively fixed. The Bank calculates by fairness and work scope.
4. Keahlian dan Pengalaman Kantor Akuntan Publik, Akuntan Publik, dan Tim Audit  
Berdasarkan data dari otoritas, Kantor Akuntan Publik Purwantono, Sungkoro & Surja yang merupakan kantor akuntan publik yang tergolong *the big four*, sehingga kualitas, kompetensi dan integritas dapat diyakini cukup baik. Dari hal ini diharapkan jasa yang diberikan dapat memberikan nilai tambah bagi integritas informasi keuangan Bank sesuai prinsip akuntansi keuangan yang berlaku.
4. Expertise and Experience of Public Accounting Firm, Public Accountant, and Audit Team  
Based on data from the authorities, Public Accounting Firm Purwantono, Sungkoro & Surja is a public accounting firm within the big four, and therefore, its quality, competence, and integrity can be deemed as sufficiently good. Thus, it is expected that the services provided can give added value for the integrity of the Bank's financial information in accordance with the applicable financial accounting principles.
5. Metodologi, Teknik, dan Sarana Audit yang Digunakan
- a. Melakukan pemeriksaan dan rekonsiliasi jurnal manual, buku besar dan penyesuaian yang dilakukan, mengingat masih terdapat jurnal manual yang berpotensi terjadi kesalahan/penyimpangan/kecurangan;
- b. Mengkaji ulang pengakuan pendapatan, termasuk melakukan *test* dan *proofing* atas perhitungan besaran EIR dan lainnya;
- c. Mengkaji ulang kecukupan cadangan atas *loan impairment*, dengan melakukan tinjauan perhitungan secara individual dan kolektif serta penghitungan LGD;
5. Methodology, Technique, and Facilities of Audit Used
- a. Conducting audit and reconciliation of manual journals, ledgers, and adjustments made, since there are manual journals that may have the potential for errors/irregularities/fraud;
- b. Reviewing revenue recognition, including conducting test and proofing on the calculation of EIR and others;
- c. Reviewing the adequacy of allowances for loan impairment, by reviewing the calculations individually and collectively as well as LGD calculation;

- d. Mengkaji ulang pengelolaan aset produktif sebagaimana ketentuan dan aturan yang berlaku, termasuk penggolongan kualitas pencadangannya;
  - e. Mengkaji ulang dana pihak ketiga dengan melakukan verifikasi buku besar di neraca dan biaya bunga serta melakukan konfirmasi;
  - f. Mengkaji ulang AYDA, termasuk evaluasi *action plan* penyelesaiannya dan perhitungan kecukupan pencadangan berdasarkan estimasi periode hingga dijual;
  - g. Mengkaji ulang investasi pada surat-surat berharga, serta perlakuan akuntansi dan pencatatan klasifikasi maupun valuasinya;
  - h. Mengkaji ulang perhitungan ATMR dan Kewajiban Penyediaan Modal Minimum (KPMM) sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan mengenai Kewajiban Penyediaan Modal Minimum Bank Umum; serta
  - i. Melakukan kajian atas Entitas Anak, Bank Syariah, terutama hal yang signifikan, seperti kecukupan cadangan pembiayaan dan amortisasi fee dan biaya transaksi.
6. Manfaat *Fresh Eyes Perspectives* yang Akan Diperoleh Melalui Penggantian Kantor Akuntan Publik, Akuntan Publik dan Tim Audit
- Adanya potensi risiko atas penggunaan jasa audit oleh kantor akuntan publik yang sama secara berturut-turut untuk kurun waktu yang cukup panjang, dimitigasi dengan penggantian penanggung jawab pada tahun 2020 sedangkan untuk tahun buku 2021, diharapkan tetap akan dapat diperoleh hasil yang lebih baik dan objektif, mengingat bahwa kualitas Kantor Akuntan Publik Purwantono, Sungkoro & Surja telah dikenal dengan baik. Namun demikian, Komite akan tetap melakukan pemantauan secara terus menerus agar potensi risiko atas ketidakpekaan dapat dideteksi lebih dini.
- d. Reviewing the management of earning assets in accordance with the applicable provisions and regulations, including classification of the allowance quality;
  - e. Reviewing third-party deposits by verifying the ledgers in the balance sheet and interest expenses and making confirmation;
  - f. Reviewing Foreclosed Assets, including evaluation of the action plan and its settlement and calculation of adequacy of allowances based on estimation of the period until such is sold;
  - g. Reviewing investment in marketable securities, the accounting treatment, the classification recording, and the investment valuation;
  - h. Reviewing RWA calculation and Capital Adequacy Ratio (CAR) as stipulated in the Financial Services Authority Regulation on Capital Adequacy Ratio for Commercial Banks; and
  - i. Reviewing Subsidiary, Bank Victoria Syariah, particularly on significant matters, such as the adequacy of financing reserves, fee amortization, and transaction charges.
6. Benefit of Fresh Eyes Perspectives that will be Obtained Through Replacement of Public Accounting Firm, Public Accountant, and Audit Team
- The potential risk of using audit services provided by the same public accounting firm consecutively for a considerable long period of time is mitigated by replacing the person in charge of the audit in 2020, which therefore, in 2021 the results are expected to be better and objective, considering that the quality of Public Accounting Firm Purwantono, Sungkoro & Surja is well-known. Nonetheless, the Committee will still conduct the monitoring continuously so that the potential risk of insensitivity can be detected earlier.

## Rapat Komite Audit

### Kebijakan Rapat Komite Audit

Berdasarkan Piagam dan Pedoman Kerja Komite Audit, Komite Audit mengadakan rapat sesuai keperluan Bank, minimal setiap 3 (tiga) bulan sekali, yang dipimpin langsung oleh Ketua Komite Audit. Rapat Komite Audit dapat mengundang Divisi SKAI/*Integrated & Anti Fraud* dan/atau Direktur yang membawahi Divisi SKAI/*Integrated & Anti Fraud*, Pejabat Eksekutif Bank, kantor akuntan publik sebagai auditor eksternal Bank, ataupun penasehat ahli dari eksternal jika diperlukan.

## Audit Committee Meeting

### Audit Committee's Meeting Policy

Based on Audit Committee Charter and Work Guidelines, the Audit Committee holds meetings according to the Bank's requirement, minimum of 3 (three) times a month, chaired directly by the Chairperson of the Audit Committee. The Audit Committee meeting may invite Internal Audit Work Unit/*Integrated & Anti Fraud* Division and/or the Director supervising the Internal Audit Work Unit/*Integrated & Anti Fraud* Division, the Bank's Executive Officer, public accounting firm as the Bank's external auditor, or external expert advisor if necessary.

## Frekuensi dan Kehadiran Rapat Komite Audit

Pada tahun 2021, frekuensi dan kehadiran rapat Komite Audit diungkapkan sebagai berikut.

## Audit Committee's Meeting Frequency and Attendance

Audit Committee's meeting frequency and attendance in 2021 is as disclosed below.

Tanggal Date	Agenda	Gunawan Tenggarahardja	Medi Sejati*	Ignace Widiatmoko**	Retno Dwijanti Widaningih***	Yozef Abdulrachman
21 April 2021	Rencana kerja Komite Audit dan realisasi triwulan I 2021. Audit Committee's work plan and the realization in Quarter I 2021.	✓	-	✓	-	✓
27 April 2021	Hasil Audit Bank Victoria tahun buku 2020. Bank Victoria's Audit Results for 2020 fiscal year.	✓	-	✓	-	✓
20 Agustus 2021 20 August 2021	<i>Kick off Meeting</i> dengan kantor akuntan publik untuk audit umum tahun buku 2021. Kick off Meeting with public accounting firm for general audit of the 2021 fiscal year.	✓	-	✓	-	✓
18 Oktober 2021 18 October 2021	Rencana kerja dan realisasi audit – SKAI/ <i>Integrated &amp; Anti Fraud</i> triwulan III 2021. Audit work plan and the realization – SKAI/ <i>Integrated &amp; Anti-Fraud</i> Quarter III 2021.	✓	-	✓	-	✓
10 Desember 2021 10 December 2021	Rencana kerja Komite Audit tahun 2022 dan realisasi audit – SKAI/ <i>Integrated &amp; Anti Fraud</i> triwulan IV 2021. Audit Committee's 2022 work plan and the realization of audit – SKAI/ <i>Integrated &amp; Anti-Fraud</i> Quarter IV 2021.	✓	✓	-	-	✓
<b>Total Kehadiran dalam Rapat</b> Total Meeting Attendance		<b>5</b>	<b>1</b>	<b>4</b>	<b>0</b>	<b>5</b>
<b>Total Rapat</b> Total Meetings		<b>5</b>	<b>1</b>	<b>4</b>	<b>0</b>	<b>5</b>
<b>Tingkat Kehadiran (%)</b> Attendance Rate (%)		<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>0.00</b>	<b>100.00</b>
<b>Rata-rata Kehadiran (%)</b> Attendance Average (%)		<b>100.00</b>				

\* Menjabat sejak 26 Oktober 2021.

\*\* Menjabat sejak 8 April 2021 sampai 26 Oktober 2021.

\*\*\* Menjabat sampai 8 April 2021.

\* In position since 26 October 2021.

\*\* In position from 8 April 2021 to 26 October 2021.

\*\*\* In position until 8 April 2021.

## Laporan Singkat Pelaksanaan Kegiatan Komite Audit Tahun 2021

Pada tahun 2021, Komite Audit telah melakukan penelaahan dan peninjauan, baik melalui analisa laporan maupun melalui rapat yang hasilnya disampaikan kepada Dewan Komisaris, antara lain:

1. Rencana kerja Komite Audit dan realisasi triwulan I 2021;
2. Hasil audit Bank Victoria tahun buku 2020;
3. *Kick off meeting* dengan Kantor Akuntan Publik Purwantono, Sungkoro & Surja untuk audit umum tahun buku 2021;
4. Rencana kerja dan realisasi Audit – SKAI/*Integrated & Anti Fraud* triwulan III 2021; dan
5. Rencana kerja Komite Audit tahun 2022 dan realisasi audit – SKAI/*Integrated & Anti Fraud* triwulan IV 2021.

## Brief Report on Audit Committee's Activities In 2021

In 2021, the Audit Committee conducted assessment and review, either through report analysis or through meetings, of which the results were submitted to the Board of Commissioners, among others:

1. Audit Committee's work plan and the realization in the 1st quarter of 2021;
2. Bank Victoria's audit result for 2020 fiscal year;
3. Kick off meeting with Public Accounting Firm Purwantono, Sungkoro & Surja for general audit of the 2021 fiscal year;
4. Audit work plan and the realization - SKAI/*Integrated & Anti Fraud* for the 3rd quarter of 2021; and
5. Audit Committee's work plan in 2022 and the realization - SKAI/*Integrated & Anti Fraud* for the 4th quarter of 2021.

## Organ Pendukung Dewan Komisaris Board of Commissioners Supporting Organ

Dalam menjalankan tugasnya, Dewan Komisaris juga dibantu oleh organ yang berada di bawah Dewan Komisaris, yaitu Sekretaris Dewan Komisaris.

### Sekretaris Dewan Komisaris

Sekretaris Dewan Komisaris adalah organ Dewan Komisaris yang bertugas untuk mengoordinasikan kegiatan identifikasi, perencanaan, dan pelaksanaan strategi pengelolaan kegiatan kesekretariatan dan protokoler Dewan Komisaris demi terciptanya fungsi Kesekretariatan Dewan Komisaris yang efektif dan efisien. Dalam pelaksanaan tugasnya, Sekretaris Dewan Komisaris bertanggung jawab langsung kepada Dewan Komisaris.

### Tugas dan Tanggung Jawab Sekretaris Dewan Komisaris

Tugas dan tanggung jawab Sekretaris Dewan Komisaris beserta realisasinya sebagai berikut.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Membantu Dewan Komisaris dalam menjaga agar pelaksanaan BOC Charter secara teknis dapat dilakukan dengan tertib.</p> <p>To help the Board of Commissioners in maintaining the implementation of BOC Charter technically, so that it can be conducted in an orderly manner.</p>	<p>Menjaga pelaksanaan BOD Charter berjalan dengan tertib.</p> <p>Sustained an orderly implementation of BoD Charter.</p>
<p>Mengatur terselenggaranya rapat Dewan Komisaris.</p> <p>To manage the implementation of Board of Commissioners' meetings.</p>	<p>Mengoordinasikan kegiatan rapat internal Dewan Komisaris, rapat Dewan Komisaris dengan Direksi, serta rapat Komite-Komite Dewan Komisaris.</p> <p>Coordinated Board of Commissioners' internal meetings, joint meetings with the Board of Directors, and meetings of Committees of the Board of Commissioners.</p>
<p>Menyiapkan risalah rapat untuk disahkan dalam rapat berikutnya.</p> <p>To prepare minutes of meeting to be validated in the next meeting.</p>	<p>Menyiapkan risalah rapat selama penyelenggaraan rapat Dewan Komisaris pada tahun 2021.</p> <p>Prepared minutes of meetings during Board of Commissioners' meeting throughout 2021</p>
<p>Menyiapkan laporan tentang pelaksanaan keputusan rapat guna dikaji dalam rapat berikutnya.</p> <p>To prepare report on the implementation of meeting decisions in order to be reviewed in the next meeting.</p>	<p>Menyiapkan laporan pelaksanaan putusan rapat yang diadakan selama tahun 2021.</p> <p>Prepared meeting resolutions report for all meetings held throughout 2021.</p>
<p>Menjaga kerahasiaan seluruh dokumen yang menurut sifatnya harus dirahasiakan.</p> <p>To maintain the confidentiality of all confidential documents.</p>	<p>Memastikan terjaganya kerahasiaan seluruh dokumen yang menurut sifatnya harus dirahasiakan.</p> <p>Ensured the confidentiality of all documents of which by their nature must be kept confidential.</p>

In carrying out its duties, the Board of Commissioners is also supported by organs under its supervision, namely Board of Commissioners' Secretary.

### Secretary of the Board of Commissioners

Secretary of the Board of Commissioners is a Board of Commissioners' organ having the duties of coordinating identification activities, planning activities, and implementing the strategy of secretariat management activities and the Board of Commissioners' protocol activities for the establishment of effective and efficient Board of Commissioners' secretariat function. In implementing the duties, the Secretary of the Board of Commissioners answers directly to the Board of Commissioners.

### Duties and Responsibilities of Board of Commissioners' Secretary

Duties and responsibilities of the Board of Commissioners' Secretary including the realization are as described below.

## Komite di Bawah Direksi

### Board of Directors' Subordinate Committees

Dalam menjalankan tugasnya, Direksi dibantu oleh Komite-Komite yang berada di bawah Direksi yang bertugas untuk memberikan saran dan rekomendasi yang berhubungan dengan kebijakan-kebijakan dan arahan-arahan Direksi.

In performing its duties, the Board of Directors is assisted by subordinate committees having the duties to provide suggestions and recommendations related to the Board of Directors' policies and directions.

### Komite Manajemen Risiko

Komite Manajemen Risiko adalah komite eksekutif di bawah Direksi yang di antaranya berperan untuk memastikan bahwa penerapan manajemen risiko telah memadai, sesuai skala dan kompleksitas usaha Bank.

### Risk Management Committee

The Risk Management Committee is an executive committee under the Board of Directors whose role is to ensure that the implementation of risk management is adequate, according to the scale and complexity of the Bank's business.

#### Pedoman Komite Manajemen Risiko

Dalam menjalankan tugas dan tanggung jawabnya, Komite Manajemen Risiko mengacu pada Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tanggal 22 Maret 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016 tanggal 1 September 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum.

#### Risk Management Committee Charter

In performing its duties and responsibilities, the Risk Management Committee refers to the Financial Services Authority Regulation No. 18/POJK.03/2016 dated 22 March 2016 on Risk Management Implementation for Commercial Banks, and Financial Services Authority Circular No. 34/SEOJK.03/2016 dated 1 September 2016 on Risk Management Implementation for Commercial Banks.

#### Wewenang dan Tanggung Jawab Komite Manajemen Risiko

Wewenang dan tanggung jawab Komite Manajemen Risiko yaitu melakukan evaluasi dan memberikan rekomendasi kepada Direktur Utama terkait manajemen risiko dengan sepengetahuan Komisaris yang paling sedikit meliputi:

#### Authority and Responsibilities of Risk Management Committee

The Risk Management Committee's authority and responsibilities are to perform evaluation and give recommendations to the Board of Directors related to the risk management under the acknowledgement of the Commissioner which at least include:

Wewenang dan Tanggung Jawab Authority and Responsibilities	Realisasi 2021 2021 Realization
<p>Penyusunan kebijakan, strategi, dan pedoman penerapan manajemen risiko. Preparation of policies, strategies, and guidelines for risk management implementation.</p>	<p>Menyusun kebijakan manajemen risiko serta perubahannya yang dilakukan minimal 1 (satu) kali dalam 1 (satu) tahun termasuk strategi manajemen risiko, tingkat risiko yang diambil dan toleransi risiko, kerangka manajemen risiko serta rencana kontinjensi untuk mengantisipasi terjadinya kondisi tidak normal, seperti mengkinikan kebijakan manajemen risiko yang disesuaikan dengan stratejik Bank, yang tercermin dalam pengkinian profil risiko Bank.</p> <p>Preparing risk management policies and their amendments, which is performed as least once a year, including the risk management strategies, risk appetite and risk tolerance, risk management framework, and contingency plans to anticipate the occurrence of abnormal conditions, such as updating risk management policies adjusted to the Bank's strategies, as reflected in the updates of the Bank's risk profile.</p>

Wewenang dan Tanggung Jawab Authority and Responsibilities	Realisasi 2021 2021 Realization
<p>Penyempurnaan proses manajemen risiko secara berkala maupun bersifat insidental sebagai akibat dari suatu perubahan kondisi eksternal dan internal Bank yang memengaruhi kecukupan permodalan, profil risiko Bank, dan ketidakefektifan penerapan manajemen risiko berdasarkan hasil evaluasi.</p> <p>Improvement of the risk management process either periodically or incidentally as a result of a change of the Bank's external and internal condition that affects the Bank's capital adequacy, risk profile, and noneffectiveness of risk management implementation based on evaluation result.</p>	<p>Memperbarui dan menyempurnakan proses manajemen risiko secara berkala maupun bersifat insidental, seperti:</p> <ol style="list-style-type: none"> <li>1. Evaluasi parameter risiko inheren dan kualitas penerapan manajemen risiko Bank sesuai dengan kompleksitas dan karakteristik Bank secara berkala;</li> <li>2. Penilaian sendiri kecukupan modal sesuai dengan profil risiko Bank (ICAAP); serta</li> <li>3. <i>Stress test</i> secara periodik melalui skenario spesifik dan pasar untuk mengantisipasi, serta secara proaktif mengelola potensi terjadinya risiko.</li> </ol> <p>Updating and refining the risk management process, periodically or incidentally, such as:</p> <ol style="list-style-type: none"> <li>1. Evaluation of inherent risk parameter and the Bank's risk management implementation quality in line with the Bank's complexity and characteristics periodically;</li> <li>2. Self-assessment of capital adequacy according to the Bank's risk profile (ICAAP); and</li> <li>3. Periodic stress test through specific scenario and market to anticipate and proactively manage potential risks.</li> </ol>
<p>Penetapan hal-hal terkait dengan keputusan bisnis yang menyimpang dari prosedur normal.</p> <p>Determination of matters related to business decisions that deviate from normal procedures.</p>	<p>Menetapkan hal-hal terkait dengan keputusan bisnis yang menyimpang dari prosedur normal, seperti:</p> <ol style="list-style-type: none"> <li>1. Pelampauan ekspansi usaha yang signifikan dibandingkan dengan Rencana Bisnis Bank yang telah ditetapkan sebelumnya; serta</li> <li>2. Pengambilan posisi/eksposur risiko yang melampaui limit yang telah ditetapkan.</li> </ol> <p>Determining matters related to business decisions that deviate from normal procedures, such as:</p> <ol style="list-style-type: none"> <li>1. Business expansion that significantly exceeds the pre-determined one in the Bank's Business Plan; and</li> <li>2. Taking a risk position/exposure that exceeds the predetermined limit.</li> </ol>

### Tugas dan Tanggung Jawab Komite Manajemen Risiko

Tugas dan tanggung jawab Komite Manajemen Risiko berdasarkan Surat Keputusan Direksi No. 017/SK-DIR/02/20 diuraikan sebagai berikut.

1. Melakukan pengembangan atas penerapan budaya risiko untuk setiap jenjang organisasi;
2. Mengevaluasi dan menyesuaikan Kebijakan dan Pedoman Umum Penerapan Manajemen Risiko dengan kebijakan otoritas yang disesuaikan dengan ukuran dan kompleksitas usaha Bank serta risiko yang melekat pada Bank;
3. Mengevaluasi arah, strategi, dan program manajemen risiko;
4. Mengevaluasi penerapan manajemen risiko, yang meliputi:
  - a. Pemantauan terhadap implementasi Kebijakan dan Pedoman Umum Penerapan Manajemen Risiko;
  - b. Pemantauan posisi risiko secara keseluruhan (*composite*), per jenis risiko, dan per jenis aktivitas fungsional Bank dan *stress testing* guna mengetahui dampak dari implementasi kebijakan dan strategi manajemen risiko;
  - c. Pengkajian secara berkala terhadap proses manajemen risiko;
  - d. Pengkajian terhadap usulan aktivitas/produk baru dan penerbitan produk dan/atau pelaksanaan aktivitas tertentu, termasuk mengevaluasi sistem dan prosedur yang digunakan serta dampaknya terhadap eksposur risiko Bank secara keseluruhan; dan

### Duties and Responsibilities of the Risk Management Committee

Duties and responsibilities of the Risk Management Committee based on the Board of Directors' Decision Letter No. 017/SK-DIR/02/20 is described as follows.

1. Developing the implementation of risk culture for each organizational level;
2. Evaluating and adjusting the Risk Management Policy and General Guidelines to regulatory policies, which are adjusted to the Bank's business size and complexity and the risks inherent in the Bank;
3. Evaluating risk management direction, strategy, and program;
4. Evaluating the risk management implementation, which includes:
  - a. Monitoring the implementation of Policies and General Guidelines of Risk Management Implementation;
  - b. Monitoring the risk position in overall (*composite*), per type of risks, and per type of functional activity of the Bank and stress testing in order to know the impact of the implementation of risk management policies and strategies;
  - c. Conducting periodic review on risk management process;
  - d. Monitoring of review of proposed new activities/products and issuance of products and/or implementation of certain activities, including evaluating the system and procedure used, and the impact on the Bank's risk exposure in overall; and



- e. Pengungkapan manajemen risiko paling sedikit mencakup kinerja manajemen risiko dan arah kebijakan manajemen risiko.

- e. Risk Management disclosure of at least the risk management performance and policy direction.

### Keanggotaan Komite Manajemen Risiko

Susunan keanggotaan Komite Manajemen Risiko Bank berdasarkan Surat Keputusan Direksi No. 014/SK-DIR/10/17 diuraikan sebagai berikut.

Susunan Composition	Diisi oleh Held by
Ketua (Anggota Tetap) Chairperson (Permanent Member)	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management
Anggota Tetap Permanent Member	<ol style="list-style-type: none"> <li>Direksi</li> <li>Associate Directors</li> <li>Kepala Divisi <i>Risk Management/Integrated</i> (Secretary)</li> <li>Kepala Divisi SKAI/<i>Integrated &amp; Anti Fraud</i> <ol style="list-style-type: none"> <li>Board of Directors</li> <li>Associate Directors</li> <li>Head of Risk Management/<i>Integrated Division</i> (Secretary)</li> <li>Head of SKAI/<i>Integrated &amp; Anti Fraud Division</i></li> </ol> </li> </ol>
Anggota Tidak Tetap Non-Permanent Members	Kepala Divisi di luar Anggota Tetap dan Kepala Unit Division Heads who are Non-Permanent Members and Head of Unit

### Rapat Komite Manajemen Risiko

Komite Manajemen Risiko menyelenggarakan rapat sesuai kebutuhan dan/atau minimal 3 (tiga) bulan sekali dalam 1 (satu) tahun. Rapat Komite Manajemen Risiko dinyatakan kuorum apabila dihadiri oleh minimal 51,00% dari anggota tetap.

Adapun agenda rapat atau yang dibahas di antaranya sebagai berikut.

- Tindak lanjut saran pendapat Manajemen;
- Trends risk* dan pemantauan limit kredit berdasarkan sektor ekonomi;
- Risk register*;
- Value at risk*;
- Peer group*;
- Stress test*;
- Profil risiko;
- Risk Based Bank Rating* (RBBR); dan
- Pendapat dan saran anggota Komite.

### Risk Management Committee's Meeting

The Risk Management Committee holds meetings as necessary and/or holds a minimum of 3 (three) meetings in 1 (one) year. The Risk Management Committee's meeting is declared as quorum if attended by a minimum of 51.00% of the permanent members.

The agenda for meeting or discussion is as follows.

- Follow-up on Management's opinion and suggestions;
- Trends of risk and monitoring of credit limits by economic sector;
- Risk register;
- Value at risk;
- Peer group;
- Stress test;
- Risk profile;
- Risk Based Bank Rating (RBBR); and
- Opinions and suggestions of Committee members.

### Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan merupakan komite eksekutif yang bertanggung jawab untuk memastikan penerapan manajemen risiko telah memadai dan sesuai dengan karakteristik serta kompleksitas usaha Grup Keuangan Victoria.

### Integrated Risk Management Committee in the Financial Group

Integrated Risk Management Committee in the Financial Group is an executive committee responsible for ensuring adequate risk management implementation that is in accordance with Victoria Financial Group's characteristics and business complexity.



### Pedoman Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Pelaksanaan tugas dan tanggung jawab Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan mengacu pada Peraturan Otoritas Jasa Keuangan No. 17/POJK.03/2014 tanggal 18 November 2014 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan, Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2014 tanggal 18 November 2014 tentang Penerapan Tata Kelola Terintegrasi bagi Konglomerasi Keuangan, Peraturan Otoritas Jasa Keuangan No. 45/POJK.03/2020 tanggal 14 Oktober 2020 tentang Konglomerasi Keuangan, dan Surat Otoritas Jasa Keuangan No. S-66/PB.33/2021 tanggal 23 Juni 2021 hal Perubahan Status Konglomerasi Keuangan Grup Victoria menjadi Grup Keuangan Victoria, dimana Bank ditunjuk sebagai Entitas Koordinator.

### Tugas dan Tanggung Jawab Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Tugas dan tanggung jawab Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan berdasarkan Surat Keputusan Direksi No. 002/SK-DIR/08/21 yang diuraikan sebagai berikut.

1. Mengembangkan penerapan budaya risiko secara terintegrasi sebagai bagian dari penerapan manajemen risiko terintegrasi Grup Keuangan Victoria;
2. Melaksanakan kebijakan manajemen risiko secara terintegrasi dalam Grup Keuangan Victoria yang telah ditetapkan;
3. Memberikan rekomendasi serta perbaikan atau penyempurnaan dalam hal penyusunan kebijakan manajemen risiko secara terintegrasi dalam Grup Keuangan Victoria;
4. Mengarahkan, menyetujui, memantau, mengevaluasi, dan menyesuaikan kebijakan dan/atau pedoman umum penerapan manajemen risiko terintegrasi dalam Grup Keuangan Victoria sesuai dengan ukuran dan kompleksitas usaha anggota Grup Keuangan Victoria; dan
5. Mengevaluasi arah, strategi, dan program manajemen risiko terintegrasi dalam Grup Keuangan Victoria.

### Struktur dan Keanggotaan Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Susunan keanggotaan Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria berdasarkan Surat Keputusan Direksi No. 001/SK-DIR/08/21 tanggal 20 Agustus 2021. Informasi terkait komposisi Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan diungkapkan pada tabel berikut.

Susunan Composition	Diisi oleh Held by
Ketua (Anggota) Chairperson (Member)	Direktur Kepatuhan dan Manajemen Risiko Entitas Koordinator Director of Compliance and Risk Management of Coordinator Entity
Sekretaris (Anggota) Secretary (Member)	Kepala Divisi <i>Risk Management/Integrated</i> Entitas Koordinator Head of Risk Management/Integrated Division of Coordinator Entity
Anggota Member	<ol style="list-style-type: none"> <li>1. Bank Victoria Syariah                             <ol style="list-style-type: none"> <li>a. Direktur yang membawahi fungsi manajemen risiko</li> <li>b. Unit Manajemen Risiko</li> </ol> </li> <li>2. Victoria Sekuritas Indonesia                             <ol style="list-style-type: none"> <li>a. Direktur yang membawahi fungsi manajemen risiko</li> <li>b. Unit Manajemen Risiko</li> </ol> </li> </ol>

### Guidelines of Integrated Risk Management Committee in the Financial Group

Implementation of duties and responsibilities of the Integrated Risk Management Committee in the Financial Group refers to Financial Services Authority Regulation No. 17/POJK.03/2014 dated 18 November 2014 on the Implementation of Integrated Risk Management for Financial Conglomeration, Financial Services Authority Regulation No. 18/POJK.03/2014 dated 18 November 2014 on Implementation of Integrated Governance for Financial Conglomeration, Financial Services Authority Regulation No. 45/POJK.03/2020 dated 14 October 2020 on Financial Conglomeration, and Financial Services Authority Circular No. S-66/PB.33/2021 dated 23 June 2021 on Changes in Status of Victoria Group Financial Conglomeration to Victoria Financial Group, in which the Bank is appointed as the Coordinating Entity.

### Duties and Responsibilities of the Integrated Risk Management Committee in the Financial Group

Duties and responsibilities of the Integrated Risk Management Committee in the Financial Group based on the Board of Directors' Decision Letter No. 002/SK-DIR/08/21 are described as follows.

1. Developing risk culture in an integrated manner as part of integrated risk management implementation in Victoria Financial Group;
2. Implementing risk management policies in an integrated manner within the established Victoria Financial Group;
3. Providing recommendations for improvements or refinements in formulating integrated risk management policies within Victoria Financial Group;
4. Directing, approving, monitoring, evaluating, and adjusting the policies and/or general guidelines on integrated risk management implementation in Victoria Financial Group in accordance with the business size and complexity of Victoria Financial Group members; and
5. Evaluating the directions, strategies, and integrated risk management program of Victoria Financial Group.

### Structure and Composition of the Integrated Risk Management Committee in the Financial Group

The composition of Integrated Risk Management Committee in the Financial Group is based on the Board of Directors' Decision Letter No. 001/SK-DIR/08/21 dated 20 August 2021. Information on the composition of the Integrated Risk Management Committee in the Financial Group is disclosed in the following table.

Susunan Composition	Diisi oleh Held by
	<ul style="list-style-type: none"> <li>3. Victoria Insurance               <ul style="list-style-type: none"> <li>a. Direktur yang membawahi fungsi manajemen risiko</li> <li>b. Pejabat Eksekutif yang memimpin Satuan Kerja Manajemen Risiko</li> </ul> </li> <li>4. Victoria Manajemen Investasi               <ul style="list-style-type: none"> <li>a. Direktur yang membawahi fungsi manajemen risiko</li> <li>b. Unit Manajemen Risiko</li> </ul> </li> <li>5. Victoria Alife Indonesia               <ul style="list-style-type: none"> <li>a. Direktur yang membawahi fungsi manajemen risiko</li> <li>b. Pejabat Eksekutif yang memimpin Satuan Kerja Manajemen Risiko</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>1. Bank Victoria Syariah               <ul style="list-style-type: none"> <li>a. Director in charge of risk management function</li> <li>b. Risk Management Unit</li> </ul> </li> <li>2. Victoria Sekuritas Indonesia               <ul style="list-style-type: none"> <li>a. Director in charge of risk management function</li> <li>b. Risk Management Unit</li> </ul> </li> <li>3. Victoria Insurance               <ul style="list-style-type: none"> <li>a. Director in charge of risk management function</li> <li>b. Executive Officer in charge of Risk Management Work Unit</li> </ul> </li> <li>4. Victoria Manajemen Investasi               <ul style="list-style-type: none"> <li>a. Director in charge of risk management function</li> <li>b. Risk Management Unit</li> </ul> </li> <li>5. Victoria Alife Indonesia               <ul style="list-style-type: none"> <li>a. Director in charge of risk management function</li> <li>b. Executive Officer in charge of Risk Management Work Unit</li> </ul> </li> </ul>

### Rapat Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Rapat Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria diselenggarakan secara berkala sekurang-kurangnya 1 (satu) kali setiap semester dalam setahun maupun insidental. Rapat Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan dinyatakan kuorum apabila dihadiri minimal 51,00% dari anggota tetap.

Adapun agenda rapat atau yang dibahas di antaranya sebagai berikut.

1. Bagan struktur Grup Keuangan Victoria yang mencakup nama entitas Lembaga Jasa Keuangan (LJK), jenis LJK, dan persentase kepemilikan;
2. Data keuangan baik itu secara individu, konsolidasi, maupun data keuangan Grup Keuangan Victoria; dan
3. Transaksi intragrup yang terdiri dari transaksi keuangan, transaksi non-keuangan, dan juga mitigasi risiko transaksi intragrup.

### Assets and Liability Committee

*Assets and Liabilities Committee* (ALCO) merupakan Komite yang dibentuk untuk membantu Direksi dalam menetapkan strategi terhadap pengendalian risiko likuiditas dan rentabilitas serta pengambilan keputusan manajemen dalam rangka pengelolaan aset dan liabilitas.

#### Pedoman ALCO

Dalam menjalankan tugas dan tanggung jawabnya, ALCO mengacu pada Surat Keputusan Direksi No. 004/SK-DIR/09/16 tanggal 5 September 2016 tentang Pedoman dan Tata Tertib Kerja *Assets and Liabilities Committee* (ALCO) PT Bank Victoria International Tbk.

### Financial Group Risk Management Committee Meeting

Meeting of the Integrated Risk Management Committee in the Financial Group is held regularly at least once every semester in a year or incidentally. The meeting of the Integrated Risk Management Committee in the Financial Group is declared a quorum if attended by at least 51.00% of the permanent members.

The agenda for meeting or discussion is as follows.

1. Victoria Financial Group structure chart which includes the name of Financial Services Institution (LJK) entity, type of LJK, and percentage of ownership;
2. Financial data whether individually, consolidated, or financial data of Victoria Financial Group; and
3. Intragroup transactions consisting of financial transactions, non-financial transactions, and risk mitigation of intragroup transactions.

### Assets and Liability Committee

*Assets and Liabilities Committee* (ALCO) is a Committee formed to assist the Board of Directors in determining strategies on liquidity and profitability risk control and the management's decision making for the purpose of managing assets and liabilities.

#### ALCO Charter

In performing its duties and responsibilities, ALCO refers to the Board of Directors' Decision Letter No. 004/SK-DIR/09/16 dated 5 September 2016 on the Guidelines and Code of Conduct of *Assets and Liabilities Committee* (ALCO) of PT Bank Victoria International Tbk.

## Tugas dan Tanggung Jawab ALCO

Berikut tugas dan tanggung jawab ALCO beserta realisasinya di tahun 2021.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
Memantau dan memperhatikan struktur neraca dan memaksimalkan profitabilitas. Monitoring and overseeing the balance sheet structure and maximizing profitability.	Menganalisis kinerja keuangan yang mencakup perbandingan antara kinerja keuangan bulan yang bersangkutan dengan bulan sebelumnya. Analyzing the financial performance that includes the comparison between the financial performance of the relevant month with the previous month.
Merencanakan, menetapkan, dan mengendalikan sumber dan penggunaan dana Bank. Planning, establishing, and controlling the source and use of Bank funds.	Menjaga pertumbuhan <i>assets and liabilities</i> sesuai dengan Rencana Bisnis Bank. Maintaining the growth of assets and liabilities in accordance with the Bank's Business Plan.
Menetapkan tingkat suku bunga kredit maupun pendanaan. Establishing interest rates on credit and funding.	Mengevaluasi tingkat suku bunga Bank. Evaluating the Bank's interest rates.
Melakukan evaluasi anggaran dan realisasi Laporan Keuangan Bank dengan memperhatikan indikator-indikator/risiko Bank. Evaluating the budget and realization of the Bank's financial statements with due regard to the Bank's indicators/risks.	Mengawasi risiko-risiko likuiditas dan struktur neraca Bank. Supervising the Bank's liquidity risks and balance sheet structure.
Merumuskan, menetapkan dan mengevaluasi kebijakan, strategi, dan sasaran dalam bidang-bidang ALMA, yaitu: 1. Manajemen Strategi; 2. Manajemen Likuiditas; 3. Manajemen <i>Gap</i> ; serta 4. Manajemen Investasi dan Pendapatan ( <i>Pricing</i> ). Formulating, establishing, and evaluating policies, strategies, and objectives in the areas of ALMA, which are: 1. Strategic Management; 2. Liquidity Management; 3. Gap Management; and 4. Investment and Pricing Management.	1. Melakukan evaluasi terhadap <i>maturity gap</i> ; 2. Meningkatkan <i>fee-based income</i> melalui diversifikasi produk/aktivitas baru; 3. Menjaga tingkat profitabilitas bank pada tingkat yang sehat; serta 4. Mengelola tingkat likuiditas Bank dalam rangka menjaga tingkat likuiditas yang sehat dan sesuai ketentuan Bank Indonesia. 1. Evaluating the maturity gap; 2. Increasing fee-based income through diversification of new products/activities; 3. Maintaining the Bank's profitability level at a sound level; and 4. Managing the Bank's liquidity level in order to maintain sound liquidity level and in accordance with Bank Indonesia regulation.
Memantau dan memperhatikan perkembangan kondisi ekonomi mikro maupun makro, seperti inflasi, nilai tukar, dan perkembangan suku bunga yang dapat memengaruhi kinerja Bank. Monitoring and observing the development of micro and macroeconomic conditions, such as inflation, exchange rates, and interest rate development that may affect the Bank's performance.	Mengevaluasi perkembangan dan prospek indikator-indikator ekonomi dan menganalisis dampaknya terhadap posisi simpanan, kredit, dan profitabilitas Bank. Evaluating the progress and prospects of economic indicators and analyzing their impact on the Bank's deposit, credit, and profitability positions.

## Struktur dan Keanggotaan ALCO

Kedudukan ALCO dalam struktur organisasi berada di bawah Direksi dengan Ketua Komite diangkat dan diberhentikan oleh Direksi. Berdasarkan Surat Keputusan Direksi No. 009/SK-DIR/03/2019 tentang Susunan Keanggotaan *Assets and Liabilities Committee* (ALCO) PT Bank Victoria International Tbk, komposisi keanggotaan ALCO, yaitu:

Susunan Composition	Diisi oleh Held by
Ketua Chairperson	Direktur Utama President Director
Sekretaris Secretary	Kepala Divisi <i>Treasury</i> Head of Treasury Division
Anggota Tetap Permanent Member	1. Seluruh Direksi 2. Seluruh SEVP 3. Seluruh Kepala Divisi pada Direktorat Bisnis 4. Kepala Divisi <i>Risk Management/Integrated</i> 5. Kepala Divisi <i>Finance and Accounting</i>

## Duties and Responsibilities of ALCO

The following are ALCO's duties and responsibilities including the realization in 2021.

## Composition and Membership of ALCO

ALCO's position in the organization structure is under the Board of Directors, and the Chairperson of the Committee is appointed and dismissed by the Board of Directors. Based on Board of Directors' Decision Letter No. 009/SK-DIR/03/2019 on the Composition of *Assets and Liabilities Committee* (ALCO) of PT Bank Victoria International Tbk, the composition of ALCO Committee is as follows:

Susunan Composition	Diisi oleh Held by
	1. All Members of Board of Directors 2. All SEVP 3. All Division Head in the Business Directorate 4. Head of Risk Management/Integrated Division 5. Head of Finance and Accounting Division
Anggota Tidak Tetap Non-Permanent Members	Divisi atau Unit Kerja Lain dan Seluruh Kepala Area Other Divisions or Work Units and All Area Heads

## Rapat ALCO

Rapat ALCO dilaksanakan minimal 1 (satu) kali dalam 1 (satu) bulan atau sewaktu-waktu sesuai dengan kebutuhan. Selama tahun 2021, ALCO telah melaksanakan tugasnya melalui rapat yang dilaksanakan sebanyak 12 (dua belas) kali dengan rata-rata tingkat kehadiran 90,00%. Adapun agenda pembahasan rapat ALCO diuraikan sebagai berikut.

## ALCO Meeting

ALCO meeting is held once every month or held at any time according to requirement. Throughout 2021, ALCO carried out its duties through meetings held 12 (twelve) with attendance average rate of 90.00%. ALCO meeting agendas are as shown below.

Tanggal Rapat	Agenda	Meeting Date
14 Januari 2021	1. Tindak lanjut keputusan ALCO bulan sebelumnya	14 January 2021
16 Februari 2021	2. Ekonomi moneter	16 February 2021
17 Maret 2021	3. Ekonomi makro	17 March 2021
13 April 2021	4. Portofolio surat berharga dan aktivitas treasuri	13 April 2021
18 Mei 2021	5. Manajemen risiko pasar dan likuiditas	18 May 2021
22 Juni 2021	6. Kinerja Bank Victoria	22 June 2021
15 Juli 2021	7. Dana pihak ketiga	15 July 2021
12 Agustus 2021	8. Kredit	12 August 2021
14 September 2021	9. Keputusan ALCO	14 September 2021
27 Oktober 2021	1. Follow-up on ALCO's previous meeting's decisions	27 October 2021
19 November 2021	2. Monetary economics	19 November 2021
14 Desember 2021	3. Macro economics	14 December 2021
	4. Portfolio of securities and treasury activities	
	5. Management of market and liquidity risks	
	6. Performance of Bank Victoria	
	7. Third-party deposits	
	8. Loans	
	9. ALCO's decisions	

## Komite Kredit

Komite Kredit merupakan komite yang dibentuk dalam rangka menunjang proses pemberian kredit dan memutuskan jumlah *Credit Exposure* Bank dalam bentuk aktiva produktif sesuai dengan jumlah atau limit tertentu yang telah ditetapkan.

## Credit Committee

Credit Committee is a committee formed for the purpose of supporting credit provision process and to decide the Bank's *Credit Exposure* amount in the form of earning assets in accordance with a specified amount or limit.

## Pedoman Komite Kredit

Dalam menjalankan tugas dan tanggung jawabnya, Komite Kredit mengacu pada Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2017 tentang Kewajiban Penyusunan dan Pelaksanaan Kebijakan Perkreditan atau Pembiayaan Bank bagi Bank Umum, Surat Keputusan Dewan Komisaris No. 001/SK-KOM/02/20 tanggal 27 Februari 2020 tentang Prosedur Persetujuan dan Wewenang Komite Kredit Pusat PT Bank Victoria International Tbk, serta peraturan terkait lainnya.

## Tugas dan Tanggung Jawab Komite Kredit

Komite Kredit memiliki tugas dan tanggung jawab untuk memberikan persetujuan/penolakan terhadap usulan fasilitas penyediaan dana dari masing-masing divisi/unit pengusul.

## Struktur dan Keanggotaan Komite Kredit

Kedudukan Komite Kredit dalam struktur organisasi berada di bawah Direksi dengan ketua komite diangkat dan diberhentikan oleh Direksi. Informasi terkait komposisi anggota Komite Kredit diungkapkan sebagai berikut.

Susunan Composition	Diisi oleh Held by
Ketua (Anggota) Chairperson (Member)	Direktur Utama President Director
Anggota Members	<ol style="list-style-type: none"> <li>1. Wakil Direktur Utama</li> <li>2. Direktur Bisnis</li> <li>3. Direktur Keuangan</li> <li>4. Kepala Divisi <i>Credit Risk Review</i></li> </ol>
SEVP atau <i>Division Head</i> pengusul yang mengelola jenis fasilitas penyediaan dana yang diproses, sebagai anggota dan sebagai sumber informasi  SEVP or <i>Division Head</i> of the proposer who manages the type of fund provision facility being processed, as a member and as a source of information	<ol style="list-style-type: none"> <li>1. Vice President Director</li> <li>2. Director of Business</li> <li>3. Director of Finance</li> <li>4. Head of <i>Credit Risk Review Division</i></li> </ol>
	<ol style="list-style-type: none"> <li>1. SEVP of <i>Corporate &amp; Commercial Banking</i></li> <li>2. Kepala Divisi <i>SME Banking</i></li> <li>3. Kepala Divisi <i>Multifinance &amp; Consumer Banking</i></li> <li>4. Kepala Divisi <i>International Banking</i></li> <li>5. Kepala Divisi <i>Special Asset Management</i></li> </ol>

Direktur Kepatuhan dan Manajemen Risiko wajib hadir dalam setiap pertemuan Komite Kredit terkait dengan diperlukannya Opini Kepatuhan. Dalam hal Direktur Kepatuhan dan Manajemen Risiko berhalangan hadir, maka dapat diwakilkan kepada *Division Head of Compliance*.

## Rapat Komite Kredit

Komite Kredit melaksanakan rapat dalam bentuk rapat internal ataupun rapat sirkuler untuk memutuskan usulan kredit. Keputusan anggota Komite Kredit harus kuorum dan bulat/*unanimous*. Jika terjadi perbedaan keputusan antar anggota Komite Kredit pemutus, maka kredit dianggap tidak disetujui.

## Credit Committee Charter

In performing its duties and responsibilities, the Credit Committee refers to the Financial Services Authority Regulation No. 42/POJK.03/2017 on the Obligation to Prepare and Implement Policy of Bank Credit or Financing for Commercial Bank, Board of Commissioners' Decision Letter No. 001/SK-KOM/02/20 dated 27 February 2020 on Procedure for Approval and Authority of Central Credit Committee of PT Bank Victoria International Tbk, and other relevant regulations.

## Duties and Responsibilities of the Credit Committee

Credit Committee holds the duties and responsibilities in approving/rejecting proposed funding facilities from each proposing division/unit.

## Structure and Composition of the Credit Committee

The Credit Committee's position in the organizational structure is under the Board of Directors and the chairperson of the committee is appointed and dismissed by the Board of Directors. Information regarding the Credit Committee's composition is as disclosed below.

Director of Compliance and Risk Management must attend each of Credit Committee meeting related to the Compliance Opinion requirement. In the event that the Director of Compliance and Risk management cannot attend the meeting, then it can be represented by the Head of Compliance Division.

## Credit Committee Meeting

Credit Committee may hold internal meeting or circular meeting to decide any credit proposal. Decision made by the Credit Committee member must be quorum and unanimous. In the event of any dispute between the members of the deciding Credit Committee, then the credit will be deemed unapproved.

Pada tahun 2021, Komite Kredit telah melaksanakan tugasnya melalui rapat yang dilaksanakan sebanyak 100 kali dengan rata-rata tingkat kehadiran 99,00%. Adapun agenda pembahasan rapat Komite Kredit di dalam rapat membahas terkait pengajuan debitur.

In 2021, the Credit Committee performed its duties through the meetings held for 100 times with an average attendance rate of 99.00%. The agenda for discussion in Credit Committee meetings relates to debtor's proposal.

Tanggal Rapat Meeting Date	Agenda	Tanggal Rapat Meeting Date	Agenda
6 Januari 2021 6 January 2021	Pembahasan pengajuan debitur sejumlah 5. Discussion of 5 debtor's proposals.	30 Juni 2021 30 June 2021	Pembahasan pengajuan debitur sejumlah 7. Discussion of 7 debtor's proposals.
8 Januari 2021 8 January 2021	Pembahasan pengajuan debitur sejumlah 3. Discussion of 3 debtor's proposals.	2 Juli 2021 2 July 2021	Pembahasan pengajuan debitur sejumlah 10. Discussion of 10 debtor's proposals.
13 Januari 2021 13 January 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.	7 Juli 2021 7 July 2021	Pembahasan pengajuan debitur sejumlah 5. Discussion of 5 debtor's proposals.
15 Januari 2021 15 January 2021	Pembahasan pengajuan debitur sejumlah 10. Discussion of 10 debtor's proposals.	8 Juli 2021 8 July 2021	Pembahasan pengajuan debitur sejumlah 10. Discussion of 10 debtor's proposals.
20 Januari 2021 20 January 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.	14 Juli 2021 14 July 2021	Pembahasan pengajuan debitur sejumlah 10. Discussion of 10 debtor's proposals.
22 Januari 2021 22 January 2021	Pembahasan pengajuan debitur sejumlah 5. Discussion of 5 debtor's proposals.	16 Juli 2021 16 July 2021	Pembahasan pengajuan debitur sejumlah 9. Discussion of 9 debtor's proposals.
27 Januari 2021 27 January 2021	Pembahasan pengajuan debitur sejumlah 14. Discussion of 14 debtor's proposals.	21 Juli 2021 21 July 2021	Pembahasan pengajuan debitur sejumlah 11. Discussion of 11 debtor's proposals.
29 Januari 2021 29 January 2021	Pembahasan pengajuan debitur sejumlah 9. Discussion of 9 debtor's proposals.	23 Juli 2021 23 July 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.
3 Februari 2021 3 February 2021	Pembahasan pengajuan debitur sejumlah 14. Discussion of 14 debtor's proposals.	28 Juli 2021 28 July 2021	Pembahasan pengajuan debitur sejumlah 4. Discussion of 4 debtor's proposals.
5 Februari 2021 5 February 2021	Pembahasan pengajuan debitur sejumlah 7. Discussion of 7 debtor's proposals.	30 Juli 2021 30 July 2021	Pembahasan pengajuan debitur sejumlah 4. Discussion of 4 debtor's proposals.
10 Februari 2021 10 February 2021	Pembahasan pengajuan debitur sejumlah 15. Discussion of 15 debtor's proposals.	4 Agustus 2021 4 August 2021	Pembahasan pengajuan debitur sejumlah 13. Discussion of 13 debtor's proposals.
17 Februari 2021 17 February 2021	Pembahasan pengajuan debitur sejumlah 19. Discussion of 19 debtor's proposals.	6 Agustus 2021 6 August 2021	Pembahasan pengajuan debitur sejumlah 10. Discussion of 10 debtor's proposals.
19 Februari 2021 19 February 2021	Pembahasan pengajuan debitur sejumlah 10. Discussion of 10 debtor's proposals.	10 Agustus 2021 10 August 2021	Pembahasan pengajuan debitur sejumlah 5. Discussion of 5 debtor's proposals.
24 Februari 2021 24 February 2021	Pembahasan pengajuan debitur sejumlah 14. Discussion of 14 debtor's proposals.	13 Agustus 2021 13 August 2021	Pembahasan pengajuan debitur sejumlah 10. Discussion of 10 debtor's proposals.
26 Februari 2021 26 February 2021	Pembahasan pengajuan debitur sejumlah 11. Discussion of 11 debtor's proposals.	18 Agustus 2021 18 August 2021	Pembahasan pengajuan debitur sejumlah 5. Discussion of 5 debtor's proposals.
3 Maret 2021 3 March 2021	Pembahasan pengajuan debitur sejumlah 11. Discussion of 11 debtor's proposals.	20 Agustus 2021 20 August 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.
5 Maret 2021 5 March 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.	25 Agustus 2021 25 August 2021	Pembahasan pengajuan debitur sejumlah 12. Discussion of 12 debtor's proposals.
10 Maret 2021 10 March 2021	Pembahasan pengajuan debitur sejumlah 12. Discussion of 12 debtor's proposals.	27 Agustus 2021 27 August 2021	Pembahasan pengajuan debitur sejumlah 13. Discussion of 13 debtor's proposals.
12 Maret 2021 12 March 2021	Pembahasan pengajuan debitur sejumlah 7. Discussion of 7 debtor's proposals.	1 September 2021	Pembahasan pengajuan debitur sejumlah 9. Discussion of 9 debtor's proposals.
17 Maret 2021 17 March 2021	Pembahasan pengajuan debitur sejumlah 9. Discussion of 9 debtor's proposals.	3 September 2021	Pembahasan pengajuan debitur sejumlah 10. Discussion of 10 debtor's proposals.
19 Maret 2021 19 March 2021	Pembahasan pengajuan debitur sejumlah 12. Discussion of 15 debtor's proposals.	8 September 2021	Pembahasan pengajuan debitur sejumlah 9. Discussion of 9 debtor's proposals.
24 Maret 2021 24 March 2021	Pembahasan pengajuan debitur sejumlah 11. Discussion of 11 debtor's proposals.	10 September 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.
25 Maret 2021 25 March 2021	Pembahasan pengajuan debitur sejumlah 2. Discussion of 2 debtor's proposals.	15 September 2021	Pembahasan pengajuan debitur sejumlah 12. Discussion of 12 debtor's proposals.
26 Maret 2021 26 March 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 18 debtor's proposals.	17 September 2021	Pembahasan pengajuan debitur sejumlah 9. Discussion of 9 debtor's proposals.
31 Maret 2021 31 March 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.	22 September 2021	Pembahasan pengajuan debitur sejumlah 7. Discussion of 7 debtor's proposals.
6 April 2021	Pembahasan pengajuan debitur sejumlah 1. Discussion of 1 debtor's proposals.	24 September 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.



Tanggal Rapat Meeting Date	Agenda	Tanggal Rapat Meeting Date	Agenda
7 April 2021	Pembahasan pengajuan debitur sejumlah 13. Discussion of 13 debtor's proposals.	29 September 2021	Pembahasan pengajuan debitur sejumlah 10. Discussion of 10 debtor's proposals.
9 April 2021	Pembahasan pengajuan debitur sejumlah 10. Discussion of 10 debtor's proposals.	7 Oktober 2021 7 October 2021	Pembahasan pengajuan debitur sejumlah 13. Discussion of 13 debtor's proposals.
14 April 2021	Pembahasan pengajuan debitur sejumlah 15. Discussion of 15 debtor's proposals.	8 Oktober 2021 8 October 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 16 debtor's proposals.
16 April 2021	Pembahasan pengajuan debitur sejumlah 10. Discussion of 10 debtor's proposals.	13 Oktober 2021 13 October 2021	Pembahasan pengajuan debitur sejumlah 9. Discussion of 9 debtor's proposals.
20 April 2021	Pembahasan pengajuan debitur sejumlah 3. Discussion of 3 debtor's proposals.	15 Oktober 2021 15 October 2021	Pembahasan pengajuan debitur sejumlah 3. Discussion of 3 debtor's proposals.
21 April 2021	Pembahasan pengajuan debitur sejumlah 10. Discussion of 10 debtor's proposals.	21 Oktober 2021 21 October 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.
23 April 2021	Pembahasan pengajuan debitur sejumlah 12. Discussion of 12 debtor's proposals.	22 Oktober 2021 22 October 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.
28 April 2021	Pembahasan pengajuan debitur sejumlah 5. Discussion of 5 debtor's proposals.	27 Oktober 2021 27 October 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.
30 April 2021	Pembahasan pengajuan debitur sejumlah 11. Discussion of 11 debtor's proposals.	29 Oktober 2021 29 October 2021	Pembahasan pengajuan debitur sejumlah 5. Discussion of 5 debtor's proposals.
5 Mei 2021 5 May 2021	Pembahasan pengajuan debitur sejumlah 12. Discussion of 12 debtor's proposals.	3 November 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.
7 Mei 2021 7 May 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.	5 November 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.
11 Mei 2021 11 May 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.	10 November 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 5 debtor's proposals.
19 Mei 2021 19 May 2021	Pembahasan pengajuan debitur sejumlah 11. Discussion of 11 debtor's proposals.	12 November 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.
21 Mei 2021 21 May 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.	17 November 2021	Pembahasan pengajuan debitur sejumlah 13. Discussion of 13 debtor's proposals.
25 Mei 2021 25 May 2021	Pembahasan pengajuan debitur sejumlah 7. Discussion of 7 debtor's proposals.	19 November 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.
28 Mei 2021 28 May 2021	Pembahasan pengajuan debitur sejumlah 4. Discussion of 4 debtor's proposals.	24 November 2021	Pembahasan pengajuan debitur sejumlah 7. Discussion of 7 debtor's proposals.
2 Juni 2021 2 June 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.	29 November 2021	Pembahasan pengajuan debitur sejumlah 3. Discussion of 3 debtor's proposals.
4 Juni 2021 4 June 2021	Pembahasan pengajuan debitur sejumlah 4. Discussion of 4 debtor's proposals.	1 Desember 2021 1 December 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.
9 Juni 2021 9 June 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.	3 Desember 2021 3 December 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.
11 Juni 2021 11 June 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.	8 Desember 2021 8 December 2021	Pembahasan pengajuan debitur sejumlah 11. Discussion of 11 debtor's proposals.
16 Juni 2021 16 June 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.	10 Desember 2021 10 December 2021	Pembahasan pengajuan debitur sejumlah 3. Discussion of 3 debtor's proposals.
18 Juni 2021 18 June 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.	15 Desember 2021 15 December 2021	Pembahasan pengajuan debitur sejumlah 6. Discussion of 6 debtor's proposals.
23 Juni 2021 23 June 2021	Pembahasan pengajuan debitur sejumlah 5. Discussion of 5 debtor's proposals.	17 Desember 2021 17 December 2021	Pembahasan pengajuan debitur sejumlah 4. Discussion of 4 debtor's proposals.
25 Juni 2021 25 June 2021	Pembahasan pengajuan debitur sejumlah 5. Discussion of 5 debtor's proposals.	22 Desember 2021 22 December 2021	Pembahasan pengajuan debitur sejumlah 8. Discussion of 8 debtor's proposals.

## Komite Kebijakan Perkreditan

Komite Kebijakan Perkreditan merupakan Komite yang dibentuk untuk membantu Direksi dalam merumuskan kebijakan, mengawasi pelaksanaan kebijakan, memantau perkembangan dan kondisi portofolio perkreditan, serta memberikan saran-saran langkah perbaikan.

## Credit Policy Committee

Credit Policy Committee is a Committee formed to assist the Board of Directors in formulating policy, monitoring policy implementation, monitoring the development and condition of the credit portfolio, and providing suggestions for improvement.



## Pedoman Kebijakan Perkreditan

Dalam menjalankan tugas dan tanggung jawabnya, Komite Kebijakan Perkreditan berpedoman pada Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2017 tentang Kewajiban Penyusunan dan Pelaksanaan Kebijakan Perkreditan atau Pembiayaan Bank bagi Bank Umum.

## Tugas dan Tanggung Jawab Komite Kebijakan Perkreditan

Tugas dan tanggung jawab Komite Kebijakan Perkreditan beserta realisasinya di tahun 2021 diungkapkan sebagai berikut.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Memberikan masukan kepada Direksi dalam rangka penyusunan kebijakan perkreditan Bank, terutama yang berkaitan dengan perumusan prinsip kehati-hatian dalam perkreditan Bank.</p> <p>To provide input to the Board of Directors in the framework of the Bank's credit policy making, especially with regard to formulation of prudential principles in the Bank's credit.</p>	<p>Memberikan masukan kepada Direksi untuk merumuskan kebijakan, mengawasi pelaksanaan kebijakan, memantau perkembangan dan kondisi portofolio perkreditan, serta memberikan saran-saran langkah perbaikan.</p> <p>Providing input to the Board of Directors in formulating policies, monitoring policy implementation, monitoring the development and condition of the loan portfolio, and providing suggestions for improvement.</p>
<p>Mengawasi agar kebijakan perkreditan Bank dapat diterapkan dan dilaksanakan secara konsekuen dan konsisten, serta merumuskan pemecahan apabila terdapat hambatan/kendala dalam penerapan kebijakan perkreditan Bank.</p> <p>To supervise so that the Bank's credit policy can be implemented and executed consistently with consequence, and to formulate solutions if there are obstacles/hindrances in implementing the Bank's credit policy.</p>	<p>Menentukan standar format <i>trade checking</i> untuk <i>supplier</i> dan <i>customer</i>.</p> <p>Determining standards for trade checking format for suppliers and customers.</p>
<p>Melakukan kajian terhadap kebijakan perkreditan Bank dan memberikan saran kepada Direksi apabila diperlukan perubahan kebijakan perkreditan Bank.</p> <p>To review the Bank's credit policies and advise the Board of Directors if changes to the Bank's credit policy are necessary.</p>	<p>Melakukan evaluasi dan pemutakhiran kebijakan kredit, termasuk perubahan proses kredit.</p> <p>Evaluating and updating loan policies, including changes to the loan process.</p>
<p>Memantau dan mengevaluasi:</p> <ol style="list-style-type: none"> <li>1. Perkembangan dan kualitas portofolio perkreditan secara keseluruhan;</li> <li>2. Kebenaran pelaksanaan kewenangan memutus kredit;</li> <li>3. Kebenaran proses pemberian kredit, perkembangan dan kualitas yang diberikan kepada pihak yang terkait dengan Bank dan debitur-debitur besar;</li> <li>4. Kebenaran pelaksanaan ketentuan batas maksimum pemberian kredit;</li> <li>5. Ketaatan terhadap ketentuan perundang-undangan dan peraturan lainnya dalam pelaksanaan pemberian kredit;</li> <li>6. Penyelesaian kredit bermasalah sesuai dengan yang diterapkan dalam kebijakan perkreditan Bank; dan</li> <li>7. Upaya Bank dalam memenuhi kecukupan jumlah penyisihan penghapusan kredit.</li> </ol> <p>To monitor and evaluate:</p> <ol style="list-style-type: none"> <li>1. The development and quality of the credit portfolio in overall;</li> <li>2. The truth in implementing authority to make decision on credit;</li> <li>3. The truth of the credit distribution process, the progress and quality given to parties related to the Bank and major debtors;</li> <li>4. The truth of the implementation of the provisions on the maximum credit limit;</li> <li>5. Adherence to the provisions of legislation and other regulations in the implementation of credit provision;</li> <li>6. The settlement of non-performing loans in accordance with those applied in the Bank's credit policy; and</li> <li>7. The Bank's efforts to meet the adequacy of the allowance for credit writeoff.</li> </ol>	<p>Memantau dan mengevaluasi pemberian kredit Bank selama tahun 2021.</p> <p>Monitoring and evaluating the Bank's lending throughout 2021.</p>

## Struktur dan Keanggotaan Komite Kebijakan Perkreditan

Kedudukan Komite Kebijakan Perkreditan dalam struktur organisasi berada di bawah Direksi dengan Ketua Komite diangkat dan diberhentikan oleh Direksi. Komposisi anggota Komite Kebijakan Perkreditan terdiri dari:

## Credit Policy Committee Charter

In performing its duties and responsibilities, the Credit Policy Committee refers to Financial Services Authority Regulation No. 42/POJK.03/2017 on the Obligation to Prepare and Implement Policy of Bank Credit or Financing for Commercial Banks.

## Duties and Responsibilities of Credit Policy Committee

Duties and responsibilities of the Credit Policy Committee and the realization are as follows.

## Structure and Membership of the Credit Policy Committee

Position of the Credit Policy Committee in the organizational structure is under the Board of Directors and the Chairperson of Committee is appointed and dismissed by the Board of Directors. Composition of the Credit Policy Committee's consists of:

Susunan Composition	Diisi oleh Held by
Ketua Chairperson	Direktur Utama President Director
Wakil Ketua merangkap Anggota Vice Chairperson concurrently as Member	Direktur Bisnis Director of Business
Sekretaris merangkap Anggota Secretary concurrently as Member	Kepala Divisi dan Wakil Kepala Divisi <i>Credit Analyst</i> Head and Vice Head of Credit Analyst Division
Anggota Member	<ol style="list-style-type: none"> <li>1. Wakil Direktur Utama</li> <li>2. Direktur Keuangan</li> <li>3. Direktur Kepatuhan dan Manajemen Risiko</li> <li>4. SEVP of Corporate &amp; Commercial Banking</li> <li>5. Kepala Unit <i>Multifinance and Consumer Banking</i></li> <li>6. Kepala Unit <i>Business Support</i></li> <li>7. Kepala Unit <i>Corporate Lending</i></li> <li>8. Kepala Divisi <i>International Lending</i></li> <li>9. Kepala Divisi <i>Loan Administration</i></li> <li>10. Kepala Divisi dan/atau Wakil Kepala Divisi <i>Corporate Legal</i></li> <li>11. Kepala Divisi <i>Risk Management/Integrated</i></li> <li>12. Kepala Divisi <i>Compliance/Integrated, AML &amp; System Procedure</i></li> <li>13. Kepala Divisi <i>SKAI/Integrated &amp; Anti Fraud</i></li> </ol> <ol style="list-style-type: none"> <li>1. Deputy President Director</li> <li>2. Director of Finance</li> <li>3. Director of Compliance and Risk Management</li> <li>4. SEVP of Corporate &amp; Commercial Banking</li> <li>5. Head of Multifinance and Consumer Banking Unit</li> <li>6. Head of Business Support Unit</li> <li>7. Head of Corporate Lending Unit</li> <li>8. Head of International Lending Division</li> <li>9. Head of Loan Administration Division</li> <li>10. Head and/or Vice Head of Corporate Legal Division</li> <li>11. Head of Risk Management/Integrated Division</li> <li>12. Head of Compliance/Integrated, AML &amp; System Procedure Division</li> <li>13. Head of SKAI/Integrated &amp; Anti Fraud Division</li> </ol>

### Rapat Komite Kebijakan Perkreditan

Pada tahun 2021, Komite Kebijakan Perkreditan tidak melakukan rapat internal. Namun demikian, Komite Kebijakan Perkreditan melakukan rapat bersama *Credit Monitoring Grup* (CMG) yang dilaksanakan sebanyak 12 kali dengan rata-rata tingkat kehadiran 100,00%. Adapun agenda pembahasan rapat Kebijakan dan Batas Maksimum Pemberian Kredit (BMPK) dan *Early Warning Monitoring* (EWM).

### Credit Policy Committee Meeting

In 2021, the Credit Policy Committee did not hold internal meetings. However, the Credit Policy Committee held meetings with the Credit Monitoring Group (CMG) which were held for 12 times with an average attendance rate of 100.00%. The agenda for discussing the Policy and Legal Lending Limit (LLL) and *Early Warning Monitoring* (EWM) in the meetings is as follows.

Tanggal Rapat	Agenda	Meeting Date
29 Januari 2021	Pembahasan Batas Maksimum Pemberian Kredit (BMPK) dan <i>Early Warning Monitoring</i> (EWM). Discussing Legal Lending Limit (LLL) and <i>Early Warning Monitoring</i> (EWM).	29 January 2021
25 Februari 2021		25 February 2021
30 Maret 2021		30 March 2021
29 April 2021		29 April 2021
28 Mei 2021		28 May 2021
30 Juni 2021		30 June 2021
29 Juli 2021		29 July 2021
31 Agustus 2021		31 August 2021
30 September 2021		30 September 2021
28 Oktober 2021		28 October 2021
25 November 2021		25 November 2021
24 Desember 2021		24 December 2021

## Komite Teknologi Informasi

Komite Teknologi Informasi merupakan komite yang berfungsi untuk menyusun rencana strategis teknologi informasi yang searah dengan rencana strategis kegiatan usaha Bank, serta merumuskan kebijakan dan prosedur teknologi informasi yang utama seperti kebijakan pengamanan teknologi informasi dan manajemen risiko terkait penggunaan teknologi informasi di Bank.

### Pedoman Komite Teknologi Informasi

Dalam menjalankan tugas dan tanggung jawabnya, Komite Teknologi Informasi berpedoman pada Peraturan Otoritas Jasa Keuangan No. 38/POJK.03/2016 dan Surat Edaran Otoritas Jasa Keuangan No. 21/SEOJK.03/2017 tentang Penerapan Manajemen Risiko dalam Penggunaan Teknologi Informasi oleh Bank Umum.

### Tugas dan Tanggung Jawab Komite Teknologi Informasi

Tugas dan tanggung Jawab Komite Teknologi Informasi beserta realisasinya dijelaskan sebagai berikut.

## Information Technology Committee

Information Technology Committee is a committee holding the function to prepare information technology strategic plan aligned with the strategic plan of the Bank's business plan, to formulate the main information technology policy and procedure such as information technology security policy and risk management related to the use of information technology in the Bank.

### Information Technology Committee Charter

In performing its duties and responsibilities, Information Technology Committee refers to the Financial Services Authority Regulation No. 38/POJK.03/2016 and Financial Services Authority Circular No. 21/SEOJK.03/2017 on Implementation of Risk Management in the Use of Information Technology for Commercial Banks.

### Duties and Responsibilities of Information Technology Committee

Duties and responsibilities of the Information Technology Committee and the realization are described hereinbelow.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Membuat rencana strategis teknologi informasi (<i>information technology strategic plan</i>) yang sesuai dengan rencana strategis kegiatan usaha Bank.</p> <p>Prepare information technology strategic plan in line with the strategic plan of the Bank's business activities.</p>	<p>Membuat rencana strategis yang telah diuraikan pada bab Aspek Pendukung Bisnis dalam Laporan Tahunan ini.</p> <p>Preparing strategic plans outlined in the chapter of Aspect of Business Support in this Annual Report.</p>
<p>Merumuskan kebijakan prosedur teknologi informasi sesuai dengan Peraturan Otoritas Jasa Keuangan No. 38/POJK.03/2016 tanggal 7 Desember 2016 tentang Penerapan Manajemen Risiko dalam Penggunaan Teknologi Informasi oleh Bank Umum.</p> <p>Formulate information technology procedure policy in accordance with Financial Services Authority Regulation No. 38/POJK.03/2016 dated 7 December 2016 on Implementation of Risk Management in the Use of Information Technology for Commercial Bank.</p>	<p>Merumuskan dan memiliki kebijakan, standar, dan prosedur penggunaan teknologi informasi yang meliputi aspek:</p> <ol style="list-style-type: none"> <li>1. Manajemen;</li> <li>2. Pengembangan dan pengadaan;</li> <li>3. Operasional teknologi informasi;</li> <li>4. Jaringan komunikasi;</li> <li>5. Pengamanan informasi;</li> <li>6. Rencana pemulihan bencana;</li> <li>7. Layanan perbankan elektronik;</li> <li>8. Penggunaan pihak penyedia jasa teknologi informasi; dan</li> <li>9. Penyediaan jasa teknologi informasi oleh Bank.</li> </ol> <p>Formulating and having policies, standards, and procedures for using information technology which include aspects of:</p> <ol style="list-style-type: none"> <li>1. Management;</li> <li>2. Development and procurement;</li> <li>3. Operation of information technology;</li> <li>4. Communication network;</li> <li>5. Information safeguard;</li> <li>6. Disaster recovery plan;</li> <li>7. Electronic banking services;</li> <li>8. The use of information technology services provider; and</li> <li>9. The provision of information technology services by the Bank.</li> </ol>
<p>Melakukan pemantauan kesesuaian proyek-proyek teknologi informasi yang disetujui dengan rencana strategis teknologi informasi.</p> <p>Monitor the conformity of information technology projects, which are approved with the information technology strategic plan.</p>	<p>Membuat <i>roadmap</i> pengembangan teknologi informasi yang disesuaikan dengan rencana jangka menengah dan jangka panjang yang tercantum dalam Rencana Bisnis Bank.</p> <p>Preparing information technology development roadmap that is tailored to the medium- and long-term plans stated in the Bank's business plan.</p>
<p>Melakukan pemantauan kesesuaian proyek-proyek teknologi informasi dengan rencana proyek (<i>project charter</i>) yang disepakati dalam <i>Service Level Agreement</i> (SLA).</p> <p>Monitor the conformity of the information technology projects with the project charter agreed in the Service Level Agreement (SLA).</p>	<p>Memantau kesesuaian proyek-proyek teknologi informasi dengan rencana proyek (<i>project charter</i>) yang disepakati dalam <i>Service Level Agreement</i> (SLA).</p> <p>Monitoring the conformity of information technology projects with the project charter agreed in the Service Level Agreement (SLA).</p>

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Melakukan pemantauan kesesuaian teknologi informasi dengan kebutuhan sistem informasi manajemen yang mendukung pengelolaan kegiatan usaha Bank.</p> <p>Monitor the conformity of information technology to the needs of management information system that supports the management of the Bank's business activities.</p>	<p>Memantau kesesuaian teknologi informasi dengan kebutuhan sistem informasi manajemen yang mendukung pengelolaan kegiatan usaha Bank.</p> <p>Examining the conformity of information technology with the needs of management information system that supports the management of the Bank's business activities.</p>
<p>Melakukan evaluasi terhadap efektivitas langkah-langkah manajemen risiko dalam teknologi informasi.</p> <p>Evaluate the effectiveness of risk management measures in information technology.</p>	<p>Mengevaluasi efektivitas langkah-langkah manajemen risiko dalam teknologi informasi dengan:</p> <ol style="list-style-type: none"> <li>1. Pengawasan aktif Dewan Komisaris dan Direksi;</li> <li>2. Kecukupan kebijakan, standar, dan prosedur penggunaan teknologi informasi;</li> <li>3. Kecukupan proses identifikasi, pengukuran, pemantauan dan pengendalian risiko penggunaan teknologi informasi; serta</li> <li>4. Sistem pengendalian internal atas penggunaan teknologi informasi.</li> </ol> <p>Evaluating the effectiveness of risk management measures in information technology by:</p> <ol style="list-style-type: none"> <li>1. Active Monitoring of Board of Commissioners and Board of Directors;</li> <li>2. Adequacy of policies, standards, and procedures of use of information technology;</li> <li>3. Adequacy of process of risk identification, measurement, monitoring, and management of the use of information technology; and</li> <li>4. Internal control system for the use of information technology.</li> </ol>
<p>Melakukan pemantauan atas kinerja teknologi informasi dan upaya peningkatannya.</p> <p>Monitor the performance of information technology and its improvement efforts.</p>	<p>Melakukan pemantauan atas kinerja teknologi informasi untuk mendukung <i>customer experience</i> dalam meningkatkan layanan nasabah dan mendekatkan Bank kepada nasabah.</p> <p>Monitoring information technology performance to support customer experience in improving customer services and bringing the Bank closer to the customers.</p>
<p>Melakukan penyelesaian berbagai masalah terkait teknologi informasi yang tidak dapat diselesaikan oleh satuan kerja pengguna dan satuan kerja penyelenggara.</p> <p>Settle various problems related to information technology that cannot be settled by a user work unit and an organizing work unit.</p>	<p>Tidak terdapat masalah terkait TI yang signifikan di tahun 2021.</p> <p>There was no significant IT related issue in 2021.</p>
<p>Melakukan evaluasi kecukupan dan lokasi sumber daya yang dimiliki Bank.</p> <p>Evaluate the adequacy and location of resources owned by the Bank.</p>	<p>Mengevaluasi kecukupan dan lokasi sumber daya yang dimiliki Bank.</p> <p>Evaluating the adequacy and location of the Bank's resources.</p>

### Struktur dan Keanggotaan Komite Teknologi Informasi

Kedudukan Komite Teknologi Informasi dalam struktur organisasi berada di bawah Direksi dengan ketua komite diangkat dan diberhentikan oleh Direksi. Informasi terkait susunan komposisi Komite Teknologi Informasi diuraikan pada tabel berikut.

### Structure and Membership of the Information Technology Committee

Information Technology Committee's position in the organizational structure is under the Board of Directors and the chairperson of the committee is appointed and dismissed by the Board of Directors. Information related to the composition of the Information Technology Committee is described hereinbelow.

Susunan Composition	Diisi oleh Held by
Ketua Chair	Direktur Utama President Director
Wakil Ketua Deputy Chair	Wakil Direktur Utama Deputy President Director
Koordinator Coordinator	SEVP Change Management Office
Sekretaris Secretary	Kepala Divisi <i>Information Technology</i> Head of Information Technology Division
Anggota Tetap Permanent Members	<ol style="list-style-type: none"> <li>1. Direktur Kepatuhan dan Manajemen Risiko</li> <li>2. Direktur Bisnis</li> <li>3. Direktur Keuangan</li> <li>4. SEVP <i>Finance, Accounting &amp; Strategic Performance Management</i></li> <li>5. SEVP of <i>Corporate &amp; Commercial Banking</i></li> <li>6. Kepala Divisi <i>Operations &amp; Internal Control</i></li> </ol>

Susunan Composition	Diisi oleh Held by
	7. Kepala Divisi <i>Finance &amp; Accounting</i> 8. Kepala Divisi <i>Branch Banking Network &amp; Performance</i> 9. Kepala Unit <i>Liabilities &amp; Wealth Product</i>  1. Director of Compliance and Risk Management 2. Director of Business 3. Director of Finance 4. SEVP Finance, Accounting & Strategic Performance Management 5. SEVP of Corporate & Commercial Banking 6. Head of Operations & Internal Control Division 7. Head of Finance & Accounting Division 8. Head of Branch Banking Network & Performance Division 9. Head of Liabilities & Wealth Product Unit
Anggota Tidak Tetap Non-Permanent Members	1. Kepala Divisi <i>Risk Management/Integrated</i> 2. Kepala Divisi <i>Loan &amp; Trade Operations</i> 3. Kepala Divisi <i>Human Capital Management &amp; General Affair</i> 4. Kepala Unit <i>Marketing Communication</i>  1. Head of Risk Management/Integrated Division 2. Head of Loan & Trade Operations Division 3. Head of Human Capital Management & General Affair Division 4. Head of Marketing Communication Unit

### Rapat Komite Teknologi Informasi

Komite Teknologi Informasi minimal menyelenggarakan rapat sebanyak 1 (satu) kali dalam 6 (enam) bulan atau sewaktu-waktu sesuai dengan kebutuhan. Pada tahun 2021, Komite Teknologi Informasi telah melaksanakan tugasnya melalui rapat yang dilaksanakan sebanyak 2 (dua) kali dengan rata-rata tingkat kehadiran 95,00%. Adapun agenda rapat Komite Teknologi Informasi diuraikan sebagai berikut.

### Information Technology Committee Meeting

The Information Technology Committee conducts meeting once every 6 (six) months or at any time according to requirement. In 2021, the Information Technology Committee performed its duties through the meetings held for 2 (two) times with an average attendance rate of 95.00%. The meeting agenda of Information Technology Committee is described as follows.

Tanggal Rapat	Agenda	Meeting Date
26 Februari 2021	Pembahasan pengadaan aplikasi <i>Wealth Management</i> , pengadaan <i>revamp internet banking/mobile banking</i> , pengadaan aplikasi <i>e.Document</i> .  Discussion on procurement of <i>Wealth Management</i> application, procurement of <i>internet banking/mobile banking revamp</i> , procurement of <i>e.Document</i> application.	26 February 2021
13 Oktober 2021	Pembahasan <i>e-Money Bank Mandiri</i> , hibah server kepada Dinas Kependudukan dan Pencatatan Sipil, <i>new proxy</i> pengganti <i>blue coat</i> , situs web <i>application firewall</i> untuk situs web dan <i>revamp internet banking/mobile banking</i> , <i>infra security internet banking/mobile banking</i> , <i>collocation link DC-DRC internet banking/mobile banking</i> , <i>CR Antasena</i> .  Discussion on <i>Bank Mandiri e-Money</i> , server grants to the Department of Population and Civil Registration, new proxies to replace <i>blue coat</i> , website <i>application firewall</i> for websites and <i>internet banking/mobile banking revamps</i> , <i>internet banking/mobile banking infra security</i> , <i>DC-DRC collocation link</i> of <i>internet banking/mobile banking</i> , <i>CR Antasena</i> .	13 October 2021

### Komite Pemantau dan Pelaksanaan GCG

Komite Pemantau dan Pelaksanaan GCG merupakan komite yang dibentuk untuk membantu Direksi dalam memberikan arahan kebijakan yang berkaitan dengan pelaksanaan GCG di Bank.

### GCG Implementation and Monitoring Committee

The GCG Implementation and Monitoring Committee is a committee assisting the Board of Directors in providing policy directions related to the Bank's GCG implementation.

## Pedoman Komite Pemantau dan Pelaksanaan GCG

Dalam melaksanakan tugas dan tanggung jawabnya, Komite Pemantau dan Pelaksanaan GCG mengacu pada Peraturan Otoritas Jasa Keuangan Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 dan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum, Surat Keputusan Direksi No. 008/SK-DIR/11/21 tanggal 12 November 2021 tentang Komite Pemantau dan Pelaksanaan *Good Corporate Governance* (GCG).

## Tugas dan Tanggung Jawab Komite Pemantau dan Pelaksanaan GCG

Tugas dan tanggung jawab Komite Pemantau dan Pelaksanaan GCG dijelaskan sebagai berikut.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Memantau dan menganalisis setiap kebijakan terbaru maupun praktik terbaik terkait penerapan GCG.</p> <p>Monitoring and analyzing any current policy and best practices related to GCG implementation.</p>	<p>Memantau dan menganalisis kebijakan terbaru, yaitu:</p> <ol style="list-style-type: none"> <li>1. Peraturan Bank Indonesia:               <ol style="list-style-type: none"> <li>a. No. 21/1/PBI/2021 tentang Jumlah dan Nilai Nominal Uang Rupiah yang Dimusnahkan Tahun 2020;</li> <li>b. No. 23/2/PBI/2021 tentang Perubahan Ketiga atas Peraturan Bank Indonesia No. 20/8/PBI/2018 tentang Rasio <i>Loan to Value</i> untuk Kredit Properti, Rasio <i>Financing to Value</i> untuk Pembiayaan Properti, dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor;</li> <li>c. No. 23/3/PBI/2021 tentang Perubahan Ketiga atas Peraturan Bank Indonesia No. 20/10/PBI/2018 tentang Transaksi <i>Domestic Non-Deliverable Forward</i>;</li> <li>d. No. 23/5/PBI/2021 tentang Perubahan Keempat atas Peraturan Bank Indonesia No. 15/17/PBI/2013 tentang Transaksi SWAP Lindung Nilai kepada Bank Indonesia;</li> <li>e. No. 23/5/PBI/2021 tentang Sistem <i>Monitoring</i> Transaksi Valuta Asing terhadap Rupiah;</li> <li>f. No. 23/6/PBI/2021 tentang Penyedia Jasa Sistem Pembayaran;</li> <li>g. No. 23/7/PBI/2021 tentang Penyelenggara Infrastruktur Sistem Pembayaran;</li> <li>h. No. 23/8/PBI/2021 tentang Perubahan Kedua atas Peraturan Bank Indonesia No. 21/9/PBI/2019 tentang Laporan Bank Umum Terintegrasi;</li> <li>i. No. 23/9/PBI/2021 tentang Perubahan atas Peraturan Bank Indonesia No. 22/12/PBI/2020 tentang Penyelesaian Transaksi Bilateral Menggunakan Mata Uang Lokal melalui Bank;</li> <li>j. No. 23/10/PBI/2021 tentang Pasar Uang;</li> <li>k. No. 23/11/PBI/2021 tentang Standar Nasional Sistem Pembayaran;</li> <li>l. No. 23/12/PBI/2021 tentang Perubahan Ketiga dan Penarikan Uang Rupiah Khusus Tahun Emisi 1970 sampai dengan Tahun Emisi 1990 dari Peredaran;</li> <li>m. No. 23/13/PBI/2021 tentang Rasio Pembiayaan Inklusif Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah;</li> <li>n. No. 23/14/PBI/2021 tentang Perubahan Kelima atas Peraturan Bank Indonesia No. 17/18/PBI/2015 tentang Penyelenggaraan Transaksi, Penatausahaan Surat Berharga, dan Setelmen Dana Seketika;</li> <li>o. No. 23/15/PBI/2021 tentang Layanan Kebanksentralan;</li> <li>p. No. 23/16/PBI/2021 tentang Perubahan Ketiga atas Peraturan Bank Indonesia No. 20/3/PBI/2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah;</li> <li>q. No. 23/17/PBI/2021 tentang Perubahan Ketiga atas Peraturan Bank Indonesia No. 20/4/PBI/2018 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah;</li> <li>r. No. 23/18/PBI/2021 tentang Pengendalian Moneter.</li> </ol> </li> </ol>

## GCG Implementation and Monitoring Committee Charter

In implementing its duties and responsibilities, the GCG Implementation and Monitoring Committee refers to the Financial Services Authority Regulation No. 55/POJK.03/2016 and Financial Services Authority Circular No. 13/SEOJK.03/2017 on Governance Implementation for Commercial Bank, Board of Directors' Decision Letter No. 008/SK-DIR/11/21 dated 12 November 2021 on Good Corporate Governance (GCG) Monitoring and Implementation Committee.

## Duties and Responsibilities of GCG Implementation and Monitoring Committee

The duties and responsibilities of GCG Implementation and Monitoring Committee are as follows.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	<ol style="list-style-type: none"> <li>2. Peraturan Otoritas Jasa Keuangan: <ol style="list-style-type: none"> <li>a. No. 12/POJK.03/2021 tentang Bank Umum;</li> <li>b. No. 13/POJK.03/2021 tentang Penyelenggaraan Produk Bank Umum;</li> <li>c. No. 14/POJK.03/2021 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan No. 34/POJK.03/2018 tentang Penilaian Kembali bagi Pihak Utama Lembaga Jasa Keuangan;</li> <li>d. No. 17/POJK.03/2021 tentang Perubahan Kedua atas Peraturan Otoritas Jasa Keuangan tentang Stimulus Perekonomian Nasional sebagai Kebijakan <i>Countercyclical</i> Dampak Penyebaran Corona Virus <i>Disease</i> 2019.</li> </ol> </li> <li>3. Surat Edaran Otoritas Jasa Keuangan: <ol style="list-style-type: none"> <li>a. No. 03/SEOJK.03/2021 tentang Pelaporan dan Permintaan Informasi Debitur melalui Sistem Layanan Informasi Keuangan;</li> <li>b. No. 12/SEOJK.03/2021 tentang Rencana Bisnis Bank Umum;</li> <li>c. No. 24/SEOJK.03/2021 tentang Perhitungan Aset Tertimbang menurut Risiko Untuk Risiko Kredit dengan Menggunakan Pendekatan Standar bagi Bank Umum;</li> <li>d. No. 32/SEOJK.03/2021 tentang Perubahan atas Surat Edaran Otoritas Jasa Keuangan No. 9/SEOJK.03/2019 tentang Penilaian Kembali bagi Pihak Utama Bank;</li> <li>e. No. 34/SEOJK.03/2021 tentang Buku Panduan Akuntansi Perbankan bagi Bank Umum Konvensional.</li> </ol> </li> <li>4. Peraturan Anggota Dewan Gubernur: <ol style="list-style-type: none"> <li>a. No. 23/1/PADG/2021 tentang Pelaksanaan Lelang Berharga Negara di Pasar Perdana;</li> <li>b. No. 23/2/PADG/2021 tentang Perubahan atas Peraturan Anggota Dewan Gubernur No. 21/26/PADG/2019 tentang Devisa Hasil Ekspor dan Devisa Pembayaran Impor;</li> <li>c. No. 23/3/PADG/2021 tentang Peraturan Anggota Dewan Gubernur No. 23/3/PADG/2021 tentang Perubahan atas Peraturan Anggota Dewan Gubernur No. 22/3/PADG/2020 tentang Pelaksanaan Standardisasi Kompetensi di Bidang Sistem Pembayaran dan Pengelolaan Uang Rupiah;</li> <li>d. No. 23/4/PADG/2021 tentang Peraturan Anggota Dewan Gubernur No. 23/4/PADG/2021 tentang Perubahan atas Peraturan Anggota Dewan Gubernur No. 20/18/PADG/2018 tentang Transaksi Swap Lindung Nilai kepada Bank Indonesia;</li> <li>e. No. 23/5/PADG/2021 tentang Peraturan Anggota Dewan Gubernur No. 23/5/PADG/2021 tentang Perubahan atas Peraturan Anggota Dewan Gubernur No. 21/23/PADG/2019 tentang Laporan Bank Umum Terintegrasi;</li> <li>f. No. 23/6/PADG/2021 tentang Perubahan Kedua atas Peraturan Anggota Dewan Gubernur No. 21/25/PADG/2019 tentang Rasio <i>Loan to Value</i> untuk Kredit Properti, Rasio <i>Financing to Value</i> untuk Pembiayaan Properti, dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor (PADG Perubahan Kedua LTV/FTV dan Uang Muka);</li> <li>g. No. 23/7/PADG/2021 tentang Peraturan Anggota Dewan Gubernur No. 23/7/PADG/2021 tentang Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 21/22/PADG/2019 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah;</li> <li>h. No. 23/8/PADG/2021 tentang Peraturan Anggota Dewan Gubernur No. 23/7/PADG/2021 tentang Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 21/18/PADG/2019 tentang Implementasi Standar Nasional <i>Quick Response Code</i> untuk Pembayaran;</li> <li>i. No. 23/12/PADG/2021 tentang Penyelesaian Transaksi Bilateral antara Indonesia dan Malaysia Menggunakan Rupiah dan Ringgit melalui Bank;</li> <li>j. No. 23/13/PADG/2021 tentang Perubahan Kedua Atas Peraturan Anggota Dewan Gubernur No.21/23/PADG/2019 tentang Laporan Bank Umum Terintegrasi;</li> <li>k. No. 23/14/PADG/2021 tentang Perubahan atas Peraturan Anggota Dewan Gubernur No. 22/20/PADG/2020 tentang Penyelesaian Transaksi Bilateral antara Indonesia dan Jepang Menggunakan Rupiah dan Yen melalui Bank;</li> <li>l. No. 23/15/PADG/2021 tentang Implementasi Standar Nasional <i>Open Application Programming Interface</i> Pembayaran;</li> <li>m. No. 23/16/PADG/2021 tentang Penyelesaian Transaksi Bilateral antara Indonesia dan Tiongkok Menggunakan Rupiah dan Yuan melalui Bank;</li> <li>n. No. 23/17/PADG/2021 tentang Tata Cara Pelaksanaan Perlindungan Konsumen Bank Indonesia;</li> </ol> </li> </ol>



Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	<p>o. No. 23/18/PADG/2021 tentang Peraturan Pelaksanaan Layanan Kebanksentralan;</p> <p>p. No. 23/19/PADG/2021 tentang Penyelenggaraan Aplikasi Layanan Bank Indonesia;</p> <p>q. No. 23/20/PADG/2021 tentang Layanan <i>Sub-Registry</i> Bank Indonesia;</p> <p>r. No. 23/21/PADG/2021 tentang Transaksi <i>Letter of Credit</i> di Bank Indonesia;</p> <p>s. No. 23/22/PADG/2021 tentang Rekening Giro di Bank Indonesia;</p> <p>t. No. 23/23/PADG/2021 tentang Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 20/4/PADG/2018 tentang Penyelenggaraan Penatausahaan Surat Berharga melalui Bank Indonesia-<i>Scriptless Securities Settlement System</i>;</p> <p>u. No. 23/24/PADG/2021 tentang Kepesertaan dalam Penyelenggaraan Transfer Dana, Kliring Berjadwal, Transaksi, Penatausahaan Surat Berharga, dan Setelmen Dana Seketika;</p> <p>v. No. 23/25/PADG/2021 tentang Peraturan Anggota Dewan Gubernur No. 23/25/PADG/2021 tentang Penyelenggaraan Bank Indonesia-<i>Fast payment</i>;</p> <p>w. No. 23/26/PADG/2021 tentang Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 21/25/PADG/2019 tentang Rasio <i>Loan to Value</i> untuk Kredit Properti, Rasio <i>Financing to Value</i> untuk Pembiayaan Properti, dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor (PADG Perubahan Ketiga LTV/FTV dan Uang Muka);</p> <p>x. No. 23/27/PADG/2021 tentang Perubahan Ketujuh atas Peraturan Anggota Dewan Gubernur No. 20/10/PADG/2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing Bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah;</p> <p>y. No. 23/23/PADG/2021 tentang Perubahan atas Peraturan Anggota Dewan Gubernur No. 21/4/PADG/2019 tentang Pelaporan Kegiatan Lalu Lintas Devisa Berupa Utang Luar Negeri dan Transaksi Partisipasi Risiko.</p> <p>Monitoring and analyzing new policies, which are:</p> <p>1. Bank Indonesia Regulations:</p> <p>a. No. 21/1/PBI/2021 on Amount and Nominal Value of Rupiah Currency Destroyed in 2020;</p> <p>b. No. 23/2/PBI/2021 on Third Amendment to Bank Indonesia Regulation No. 20/8/PBI/2018 on Loan to Value Ratio for Property Credit, Financing to Value Ratio for Property Financing, and Down Payment for Motor Vehicles Credit or Financing;</p> <p>c. No. 23/3/PBI/2021 on Third Amendment to Bank Indonesia Regulation No. 20/10/PBI/2018 on Domestic Non-Deliverable Forward Transactions;</p> <p>d. No. 23/5/PBI/2021 on Fourth Amendment to Bank Indonesia Regulation No. 15/17/PBI/2013 on SWAP Hedging Transactions to Bank Indonesia;</p> <p>e. No. 23/5/PBI/2021 on Monitoring System for Foreign Exchange Transactions against Rupiah;</p> <p>f. No. 23/6/PBI/2021 on Payment System Service Provider;</p> <p>g. No. 23/7/PBI/2021 on Payment System Infrastructure Administrator;</p> <p>h. No. 23/8/PBI/2021 on Second Amendment to Bank Indonesia Regulation No. 21/9/PBI/2019 on Integrated Commercial Bank Report;</p> <p>i. No. 23/9/PBI/2021 on Amendment to Bank Indonesia Regulation No. 22/12/PBI/2020 on Settlement of Bilateral Transactions Using Local Currency through Banks;</p> <p>j. No. 23/10/PBI/2021 on Money Market;</p> <p>k. No. 23/11/PBI/2021 on Payment System National Standard;</p> <p>l. No. 23/12/PBI/2021 on Revocation and Withdrawal of Special Rupiah Money Issued from 1970 to 1990 from Circulation;</p> <p>m. No. 23/13/PBI/2021 on Macroprudential Inclusive Financing Ratio for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units;</p> <p>n. No. 23/14/PBI/2021 on Fifth Amendment to Bank Indonesia Regulation No. 17/18/PBI/2015 on Administering Transactions, Administration of Securities, and Instant Fund Settlement;</p> <p>o. No. 23/15/PBI/2021 on Central Banking Services;</p> <p>p. No. 23/16/PBI/2021 on Third Amendment to Bank Indonesia Regulation No. 20/3/PBI/2018 on Minimum Statutory Reserves in Rupiah and Foreign Currency for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units;</p> <p>q. No. 23/17/PBI/2021 on Third Amendment to Bank Indonesia Regulation No. 20/4/PBI/2018 on Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units.</p> <p>r. No. 23/18/PBI/2021 on Monetary Control.</p>

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	<p>2. Financial Services Authority Regulations:</p> <ul style="list-style-type: none"> <li>a. No. 12/POJK.03/2021 on Commercial Banks;</li> <li>b. No. 13/POJK.03/2021 on Administration of Commercial Bank Products;</li> <li>c. No. 14/POJK.03/2021 on Amendment to Financial Services Authority Regulation No. 34/POJK.03/2018 on Reassessment for Main Party of Financial Services Institutions;</li> <li>d. No. 17/POJK.03/2021 on the Second Amendment to Financial Services Authority Regulation on National Economic Stimulus as a Countercyclical Policy for the Impact of the Corona Virus 2019 Disease Spread.</li> </ul> <p>3. Financial Services Authority Circulars</p> <ul style="list-style-type: none"> <li>a. No. 03/SEOJK.03/2021 on Reporting and Requesting Debtor Information through Financial Information Service System;</li> <li>b. No. 12/SEOJK.03/2021 on Commercial Bank's Business Plans;</li> <li>c. No. 24/SEOJK.03/2021 on Calculation of Risk Weighted Assets for Credit Risk by using Standardized Approach for Commercial Banks;</li> <li>d. No. 32/SEOJK.03/2021 on Amendment to Financial Services Authority Circular No. 9/SEOJK.03/2019 on Reassessment for Bank's Main Party;</li> <li>e. No. 34/SEOJK.03/2021 on Banking Accounting Manual for Conventional Commercial Banks.</li> </ul> <p>4. Regulations of Members of Board of Governors:</p> <ul style="list-style-type: none"> <li>a. No. 23/1/PADG/2021 on Implementation of State Valuable Auctions in the Primary Market;</li> <li>b. No. 23/2/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 21/26/PADG/2019 on Foreign Exchange from Export Results and Foreign Exchange from Import Payments;</li> <li>c. No. 23/3/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 23/3/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 22/3/PADG/2020 on Standardization of Competencies in the Field of Payment System and Rupiah Money Management;</li> <li>d. No. 23/4/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 23/4/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 20/18/PADG/2018 on Swap Hedging Transactions to Bank Indonesia;</li> <li>e. No. 23/5/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 23/5/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 21/23/PADG/2019 on Integrated Commercial Bank Report;</li> <li>f. No. 23/6/PADG/2021 on the Second Amendment to Regulation of Members of Board of Governors No. 21/25/PADG/2019 on Loan to Value Ratio for Property Credit, Financing to Value Ratio for Property Financing, and Down Payment for Motor Vehicles Credit or Financing (Second Amendment to PADG LTV/FTV and Down Payment);</li> <li>g. No. 23/7/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 23/7/PADG/2021 on Third Amendment to Regulation of Members of Board of Governors No. 21/22/PADG/2019 on Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units;</li> <li>h. No. 23/8/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 23/7/PADG/2021 on Third Amendment to Regulation of Members of Board of Governors No. 21/18/PADG/2019 on Implementation of National Standard of Quick Response Code for Payment;</li> <li>i. No. 23/12/PADG/2021 on Settlement of Bilateral Transactions between Indonesia and Malaysia Using Rupiah and Ringgit through Banks;</li> <li>j. No. 23/13/PADG/2021 on the Second Amendment to the Regulation of Members of Board of Governors No. 21/23/PADG/2019 on Integrated Commercial Bank Reports;</li> <li>k. No. 23/14/PADG/2021 on Amendment to the Regulation of Members of Board of Governors No. 22/20/PADG/2020 on Settlement of Bilateral Transactions between Indonesia and Japan Using Rupiah and Yen through Banks;</li> <li>l. No. 23/15/PADG/2021 on the Implementation of National Standard of Open Application Programming Interface for Payment;</li> <li>m. No. 23/16/PADG/2021 on Settlement of Bilateral Transactions between Indonesia and China Using Rupiah and Yuan through Banks;</li> <li>n. No. 23/17/PADG/2021 on Procedures for Implementation of Bank Indonesia Consumer Protection;</li> <li>o. No. 23/18/PADG/2021 on Implementing Regulations of Central Banking Services;</li> </ul>

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	<p>p. No. 23/19/PADG/2021 on Implementation of Bank Indonesia Service Applications;</p> <p>q. No. 23/20/PADG/2021 on Sub-Registry Services of Bank Indonesia;</p> <p>r. No. 23/21/PADG/2021 on Letter of Credit Transactions at Bank Indonesia;</p> <p>s. No. 23/22/PADG/2021 on Current Accounts in Bank Indonesia;</p> <p>t. No. 23/23/PADG/2021 on Third Amendment to Regulation of Members of Board of Governors No. 20/4/PADG/2018 on Administration of Securities through Bank Indonesia, Scrippless Securities Settlement System;</p> <p>u. No. 23/24/PADG/2021 on Participation in Organizing Fund Transfers, Scheduled Clearing, Transactions, Securities Administration, and Instant Fund Settlement;</p> <p>v. No. 23/25/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 23/25/PADG/2021 on Implementation of Bank Indonesia-Fast Payment;</p> <p>w. No. 23/26/PADG/2021 on Third Amendment to Regulation of Members of Board of Governors No. 21/25/PADG/2019 on Loan to Value Ratio for Property Credit, Financing to Value Ratio for Property Financing, and Down Payment for Motor Vehicles Credit or Financing (Third Amendment to PADG LTV/FTV and Down Payment);</p> <p>x. No. 23/27/PADG/2021 on the Seventh Amendment to Regulation of Members of Board of Governors No. 20/10/PADG/2018 on Minimum Statutory Reserves in Rupiah and Foreign Exchange for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units;</p> <p>y. No. 23/23/PADG/2021 on Amendment to Regulation of Members of Board of Governors No. 21/4/PADG/2019 on Reporting of Foreign Exchange Activities in the Form of Foreign Debt and Risk Participation Transactions.</p>
<p>Melakukan pemutakhiran kebijakan internal (<i>existing</i>) terhadap setiap perubahan kebijakan GCG, sehingga kebijakan yang digunakan sesuai dengan kebijakan terbaru dan sesuai praktik terbaik.</p>	<p>Melakukan pemutakhiran kebijakan internal, yaitu:</p>
<p>Updating the existing internal policies against any GCG policy changes, so that the policies used are in accordance with the latest policies and best practices.</p>	<p>1. Kajian Kebijakan dan Prosedur:</p>
	<p>a. No. 001/SK-DIR/01/21 tentang Pedoman Kode Etik Perilaku Karyawan;</p> <p>b. No. 004/SK-DIR/01/21 tentang Penilaian Profil Risiko;</p> <p>c. No. 010/SK-DIR/01/21 tentang Kebijakan Bea Materai;</p> <p>d. No. 004/SK-DIR/02/21 tentang Standar Operasional Prosedur Transaksi Valas <i>Remittance</i>;</p> <p>e. No. 005/SK-DIR/02/21 tentang <i>Standard Operating Procedures and Policies</i> Penanganan Kredit Bermasalah;</p> <p>f. No. 005/SK-DIR/03/21 tentang Kebijakan Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme;</p> <p>g. No. 006/SK-DIR/03/21 tentang Standar Operasional Prosedur Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme;</p> <p>h. No. 010/SK-DIR/03/21 tentang <i>Standard Operating Procedures and Policies Consumer Banking</i>;</p> <p>i. No. 011/SK-DIR/03/21 tentang <i>Standard Operating Procedures and Policies</i> Penanganan Kredit Bermasalah;</p> <p>j. No. 012/SK-DIR/03/21 tentang <i>Standard Operating Procedures and Policies Multifinance</i>;</p> <p>k. No. 013/SK-DIR/03/21 tentang <i>Standard Operating Procedures and Policies</i> Segmentasi Kredit;</p> <p>l. No. 014/SK-DIR/03/21 tentang Kebijakan Transparansi dan Publikasi Laporan Bank (Permodalan);</p> <p>m. No. 015/SK-DIR/03/21 tentang Kebijakan Laporan Publikasi Eksposur Risiko;</p> <p>n. No. 019/SK-DIR/03/21 tentang Kebijakan Penerapan Tata Kelola dan Pelaporan dalam Pemberian Remunerisasi;</p> <p>o. No. 010/SK-DIR/04/21 tentang Kebijakan <i>Assets and Liability Management (ALMA)</i>;</p> <p>p. No. 028/SK-DIR/04/21 tentang Kebijakan Perlindungan Konsumen Bank Indonesia;</p> <p>q. No. 029/SK-DIR/04/21 tentang Pedoman Aktivitas Fungsional Operasional di Risiko Operasional (<i>Risk Register</i>);</p> <p>r. No. 004/SK-DIR/05/21 tentang Kebijakan <i>Liquidity Contingency Plan (LCP)</i>;</p> <p>s. No. 006/SK-DIR/05/21 tentang Standar Operasional Prosedur Rencana Bisnis Bank (RBB) (<i>Back Date</i>);</p> <p>t. No. 002/SK-DIR/06/21 tentang Kebijakan <i>Cancel, Delete</i>, dan Sanksi bagi <i>Dealer Treasury</i>;</p> <p>u. No. 001/SK-DIR/07/21 tentang Kebijakan Agen Penjual Efek Reksa Dana (APERD);</p> <p>v. No. 002/SK-DIR/07/21 tentang Standar Operasional Prosedur Agen Penjual Efek Reksa Dana (APERD);</p> <p>w. No. 003/SK-DIR/07/21 tentang Standar Operasional Prosedur Penilaian Agunan (<i>Appraisal</i>);</p>

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	<p>x. No. 002/SK-DIR/08/21 tentang Kebijakan dan Tata Tertib Kerja Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria;</p> <p>y. No. 003/SK-DIR/08/21 tentang Kebijakan dan Pedoman Umum Manajemen Risiko Grup Keuangan Victoria;</p> <p>z. No. 001/SK-DIR/10/21 tentang Kebijakan <i>Liquidity Contingency Plan</i> (LCP);</p> <p>aa. No. 002/SK-DIR/10/21 tentang Standar Operasional Prosedur Penilaian Profil Risiko;</p> <p>ab. No. 004/SK-DIR/10/21 tentang Standar Operasional Prosedur Perkreditan <i>Multifinance</i>;</p> <p>ac. No. 008/SK-DIR/10/21 tentang <i>Standard Operating Procedures and Policies</i> Penanganan Kredit Bermasalah;</p> <p>ad. No. 010/SK-DIR/10/21 tentang Kebijakan <i>Wealth Management</i> (Reksa Dana);</p> <p>ae. No. 011/SK-DIR/10/21 tentang Standar Operasional Prosedur <i>Wealth Management</i> (Reksa Dana);</p> <p>af. No. 012/SK-DIR/10/21 tentang Kebijakan Agen Penjual Efek Reksa Dana (APERD) dan Wakil Agen Penjual Efek Reksa Dana (WAPERD);</p> <p>ag. No. 013/SK-DIR/10/21 tentang Standar Operasional Prosedur Agen Penjual Efek Reksa Dana (APERD) dan Wakil Agen Penjual Efek Reksa Dana (WAPERD);</p> <p>ah. No. 001/SK-DIR/11/21 tentang <i>Standard Operating Procedures and Policies</i> Kredit Jaminan Tunai (<i>Back-to-Back</i> 100%);</p> <p>ai. No. 002/SK-DIR/11/21 tentang <i>Standard Operating Procedures and Policies Corporate, Commercial, dan Small Medium Enterprise</i>;</p> <p>aj. No. 003/SK-DIR/11/21 tentang Standar Operasional Prosedur Penilaian Agunan (<i>Appraisal</i>);</p> <p>ak. No. 004/SK-DIR/11/21 tentang <i>Standard Operating Procedures and Policies</i> Skim Pembiayaan <i>Small Medium Enterprise</i> dengan <i>Fintech</i>;</p> <p>al. No. 005/SK-DIR/11/21 tentang Kebijakan Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme;</p> <p>am.No. 006/SK-DIR/11/21 tentang Standar Operasional Prosedur Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme;</p> <p>an. No. 007/SK-DIR/11/21 tentang Pedoman Perkiraan Pembukuan <i>Chart of Account</i> (COA);</p> <p>ao. No. 009/SK-DIR/11/21 tentang Standar Operasional Prosedur Tata Kelola Pembukuan dan Pemantauan Persediaan <i>Voucher</i> atau Barang Hadiah Lainnya;</p> <p>ap. No. 010/SK-DIR/11/21 tentang Kebijakan Bank Persepsi;</p> <p>aq. No. 011/SK-DIR/11/21 tentang Standar Operasional Prosedur Bank Persepsi;</p> <p>ar. No. 012/SK-DIR/11/21 tentang Kebijakan Rekening Tabungan;</p> <p>as. No. 013/SK-DIR/11/21 tentang Standar Operasional Prosedur Rekening Tabungan;</p> <p>at. No. 014/SK-DIR/11/21 tentang Kebijakan Rekening Tabungan V-Bisnis;</p> <p>au. No. 015/SK-DIR/11/21 tentang Standar Operasional Prosedur Rekening Tabungan V-Bisnis;</p> <p>av. No. 016/SK-DIR/11/21 tentang Kebijakan Rekening Tabungan V-Jun;</p> <p>aw.No. 017/SK-DIR/11/21 tentang Standar Operasional Prosedur Rekening Tabungan V-Jun;</p> <p>ax. No. 018/SK-DIR/11/21 tentang Kebijakan <i>Liquidity Contingency Plan</i> (LCP);</p> <p>ay. No. 020/SK-DIR/11/21 tentang Kebijakan Rekening TabunganKu;</p> <p>az. No. 021/SK-DIR/11/21 tentang Standar Operasional Prosedur Rekening TabunganKu;</p> <p>ba. No. 022/SK-DIR/11/21 tentang Standar Operasional Prosedur Laporan <i>Branch Performance</i>;</p> <p>bb. No. 026/SK-DIR/11/21 tentang Kebijakan Pengamanan Jaringan Komunikasi;</p> <p>bc. No. 028/SK-DIR/11/21 tentang Kebijakan Pengelolaan Hubungan dengan Pihak Penyedia Jasa;</p> <p>bd. No. 029/SK-DIR/11/21 tentang Kebijakan CKPN sesuai PSAK 71;</p> <p>be. No. 030/SK-DIR/11/21 tentang Kebijakan Sewa sesuai PSAK 73;</p> <p>bf. No. 003/SK-DIR/12/21 tentang Kebijakan dan Prosedur Kustodian;</p> <p>bg. No. 004/SK-DIR/12/21 tentang Kebijakan Rekening Tagihan, Uang Muka, dan Rekening <i>Sundries</i>;</p> <p>bh. No. 009/SK-DIR/12/21 tentang Standar Operasional Prosedur Penilaian Profil Risiko;</p> <p>bi. No. 010/SK-DIR/12/21 tentang Kebijakan dan Prosedur Penanganan Penggunaan <i>Power User</i>;</p> <p>bj. No. 011/SK-DIR/12/21 tentang Standar Operasional Prosedur Tingkat Kesehatan Bank;</p> <p>bk. No. 012/SK-DIR/12/21 tentang Standar Operasional Prosedur BCM.</p>

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	<p>2. Kajian Produk:</p> <ul style="list-style-type: none"> <li>a. No. 001/COMP-CMO/05/2021 tentang <i>Electronic Document (E-Doc)</i>;</li> <li>b. No. 002/COMP-PD/05/2021 tentang Pengembangan/<i>Revamp Internet dan Mobile Banking</i>;</li> <li>c. No. 01/COMP-LWP/BCR/06/2021 tentang Perjanjian Kerja Sama <i>Bancassurance Allianz Wealthlink Preferred Life</i> antara PT Bank Victoria International Tbk dengan PT Allianz Life Indonesia;</li> <li>d. No. 02/COMP-LWP/BCR/06/2021 tentang Perjanjian Kerja Sama <i>Bancassurance Allianz Assetlink Maxima</i> antara PT Bank Victoria International Tbk dengan PT Allianz Life Indonesia;</li> <li>e. No. 03/COMP-LWP/BCR/06/2021 tentang Perjanjian Kerja Sama <i>Bancassurance Allianz Life Secure PASTI</i> antara PT Bank Victoria International Tbk dengan PT Allianz Life Indonesia;</li> <li>f. No. 04/COMP-LWP/BCR/06/2021 tentang Kerja Sama Pemasaran Reksadana Proteksi 6 antara PT Bank Victoria International Tbk dengan PT Setiabudi Investment Management;</li> <li>g. No. 05/COMP-LWP/BCR/06/2021 tentang Perjanjian Kerja Sama Reksadana antara PT Bank Victoria dengan PT Trimegah;</li> <li>h. No. 01/COMP-PD/07/2021 tentang Pengembangan Layanan Aktivitas atau Produk Baru "<i>Quick Response Indonesian Standard (QRIS)</i>";</li> <li>i. No. 02/COMP-PD/07/2021 tentang Kerja Sama Aktivitas Baru dengan Victoria Manajemen Investasi untuk Lancar Merkurius;</li> <li>j. No. 01/COMP-LWP/RD/08/2021 tentang Kajian Kerja Sama Reksadana Produk "<i>Batavia Dana Obligasi Ultima</i>" antara PT Bank Victoria International Tbk dengan PT Batavia Prosperindo Aset Manajemen (BPAM);</li> <li>k. No. 02/COMP-LWP/RD/08/2021 tentang Kajian Kerja Sama Reksadana Produk "<i>Batavia Dana Saham</i>" antara PT Bank Victoria International Tbk dengan PT Batavia Prosperindo Aset Manajemen (BPAM);</li> <li>l. No. 03/COMP-LWP/RD/08/2021 tentang Kajian Kerja Sama <i>Bancassurance</i> Produk "<i>Batavia Dana Saham Optimal</i>" antara PT Bank Victoria International Tbk dengan PT Batavia Prosperindo Aset Manajemen (BPAM);</li> <li>m. No. 04/COMP-LWP/RD/08/2021 tentang Kajian Kerja Sama Reksadana Produk "<i>Batavia USD Balanced Asia</i>" antara PT Bank Victoria International Tbk dengan PT Batavia Prosperindo Aset Manajemen (BPAM);</li> <li>n. No. 05/COMP-LWP/RD/08/2021 tentang Kajian Kerja Sama Reksadana Produk "<i>Batavia Global ESG Sharia Equity USD</i>" antara PT Bank Victoria International Tbk dengan PT Batavia Prosperindo Aset Manajemen (BPAM);</li> <li>o. No. 06/COMP-ECDB/RD/08/2021 tentang Kajian Aktivitas Pengembangan <i>Onboarding</i>;</li> <li>p. No. 01/COMP-ECDB/RD/10/2021 tentang Kajian pengembangan Layanan Aktivitas atau Produk Baru "<i>Fitur Tarik Tunai tanpa Kartu (Cardless Withdrawal)</i>".</li> </ul> <p>Updating internal policies as follows;</p> <p>1. Review of Policies and Procedures:</p> <ul style="list-style-type: none"> <li>a. No. 001/SK-DIR/01/21 on Employee's Code of Conduct;</li> <li>b. No. 004/SK-DIR/01/21 on Risk Profile Assessment;</li> <li>c. No. 010/SK-DIR/01/21 on Stamp Duty Policy;</li> <li>d. No. 004/SK-DIR/02/21 on Standard Operating Procedures of Remittance of Foreign Exchange Transactions;</li> <li>e. No. 005/SK-DIR/02/21 on Standard Operating Procedures and Policies for Handling Non-Performing Loans;</li> <li>f. No. 005/SK-DIR/03/21 on Policy of Anti-Money Laundering and Counter-Terrorism Financing;</li> <li>g. No. 006/SK-DIR/03/21 on Standard Operating Procedures for Anti Money Laundering and Counter-Terrorism Financing;</li> <li>h. No. 010/SK-DIR/03/21 on Standard Operating Procedures and Policies for Consumer Banking;</li> <li>i. No. 011/SK-DIR/03/21 on Standard Operating Procedures and Policies for Handling Non-Performing Loans;</li> <li>j. No. 012/SK-DIR/03/21 on Standard Operating Procedures and Policies for Multifinance;</li> <li>k. No. 013/SK-DIR/03/21 on Standard Operating Procedures and Policies for Loan Segmentation;</li> <li>l. No. 014/SK-DIR/03/21 on Policy of Transparency and Publication of Bank Reports (Capital);</li> <li>m. No. 015/SK-DIR/03/21 on Risk Exposure Publication Report Policy;</li> <li>n. No. 019/SK-DIR/03/21 on Policy of Implementation of Governance and Reporting in Providing Remuneration;</li> </ul>

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	<ul style="list-style-type: none"> <li>o. No. 010/SK-DIR/04/21 on Assets and Liability Management (ALMA) Policy;</li> <li>p. No. 028/SK-DIR/04/21 on Consumer Protection Policy of Bank Indonesia;</li> <li>q. No. 029/SK-DIR/04/21 on Guidelines for Operational Functional Activities in Operational Risk (Risk Register);</li> <li>r. No. 004/SK-DIR/05/21 on Liquidity Contingency Plan (LCP) Policy;</li> <li>s. No. 006/SK-DIR/05/21 on Standard Operating Procedures for Bank Business Plan (RBB) (Back Date);</li> <li>t. No. 002/SK-DIR/06/21 on Cancellation, Delete, and Sanctions Policy for Treasury Dealer;</li> <li>u. No. 001/SK-DIR/07/21 on Mutual Funds Selling Agent (APERD) Policy;</li> <li>v. No. 002/SK-DIR/07/21 on Standard Operating Procedures for Mutual Fund Selling Agent (APERD);</li> <li>w. No. 003/SK-DIR/07/21 on Standard Operating Procedures for Appraisal;</li> <li>x. No. 002/SK-DIR/08/21 on Policies and Procedures of the Integrated Risk Management Committee in Financial Group;</li> <li>y. No. 003/SK-DIR/08/21 on Risk Management Policies and General Guidelines of Victoria Financial Group;</li> <li>z. No. 001/SK-DIR/10/21 on Liquidity Contingency Plan (LCP) Policy;</li> <li>aa. No. 002/SK-DIR/10/21 on Standard Operating Procedures for Risk Profile Assessment;</li> <li>ab. No. 004/SK-DIR/10/21 on Standard Operating Procedures for Multifinance Loans;</li> <li>ac. No. 008/SK-DIR/10/21 on Standard Operating Procedures and Policies for Handling Non-Performing Loans;</li> <li>ad. No. 010/SK-DIR/10/21 on Wealth Management (Mutual Funds) Policy;</li> <li>ae. No. 011/SK-DIR/10/21 on Standard Operating Procedures for Wealth Management (Mutual Funds);</li> <li>af. No. 012/SK-DIR/10/21 on Policies of Mutual Funds Selling Agent (APERD) and Mutual Funds Selling Agent Representative (WAPERD);</li> <li>ag. No. 013/SK-DIR/10/21 on Standard Operating Procedures for Mutual Fund Selling Agent (APERD) and Mutual Fund Selling Agent Representative (WAPERD);</li> <li>ah. No. 001/SK-DIR/11/21 on Standard Operating Procedures and Policies for Cash Guarantee Credit (Back-to-Back 100%);</li> <li>ai. No. 002/SK-DIR/11/21 on Standard Operating Procedures and Policies for Corporate, Commercial, and Small Medium Enterprises;</li> <li>aj. No. 003/SK-DIR/11/21 on Standard Operating Procedures for Appraisal;</li> <li>ak. No. 004/SK-DIR/11/21 on Standard Operating Procedures and Policies for Financing Scheme for Small Medium Enterprises with Fintech;</li> <li>al. No. 005/SK-DIR/11/21 on Policy of Anti-Money Laundering and Counter-Terrorism Financing;</li> <li>am. No. 006/SK-DIR/11/21 on Standard Operating Procedures for Anti Money Laundering and Counter-Terrorism Financing;</li> <li>an. No. 007/SK-DIR/11/21 on Guidelines for Estimating Chart of Accounts (COA);</li> <li>ao. No. 009/SK-DIR/11/21 on Standard Operating Procedures for Bookkeeping and Monitoring Inventory of Vouchers or Other Gift Items;</li> <li>ap. No. 010/SK-DIR/11/21 on Perception Bank Policies;</li> <li>aq. No. 011/SK-DIR/11/21 on Standard Operating Procedures for Perception Bank;</li> <li>ar. No. 012/SK-DIR/11/21 on Savings Account Policies;</li> <li>as. No. 013/SK-DIR/11/21 on Standard Operating Procedures for Savings Account;</li> <li>at. No. 014/SK-DIR/11/21 on V-Bisnis Savings Account Policies;</li> <li>au. No. 015/SK-DIR/11/21 on Standard Operating Procedures for V-Bisnis Savings Account;</li> <li>av. No. 016/SK-DIR/11/21 on V-Jun Savings Account Policies;</li> <li>aw. No. 017/SK-DIR/11/21 on Standard Operating Procedures for V-Jun Savings Account;</li> <li>ax. No. 018/SK-DIR/11/21 on Liquidity Contingency Plan (LCP) Policy;</li> <li>ay. No. 020/SK-DIR/11/21 on TabunganKu Account Policies;</li> <li>az. No. 021/SK-DIR/11/21 on Standard Operating Procedures for TabunganKu Account;</li> <li>ba. No. 022/SK-DIR/11/21 on Standard Operating Procedures for Branch Performance Report;</li> <li>bb. No. 026/SK-DIR/11/21 on Communication Network Security Policies;</li> <li>bc. No. 028/SK-DIR/11/21 on Policy for Management of Relationships with Service Providers;</li> </ul>



Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	<p>bd. No. 029/SK-DIR/11/21 on Allowance for Impairment Losses (CKPN) Policies According to PSAK 71;</p> <p>be. No. 030/SK-DIR/11/21 on Lease Policies According to PSAK 73;</p> <p>bf. No. 003/SK-DIR/12/21 on Custodian Policies and Procedures;</p> <p>bg. No. 004/SK-DIR/12/21 on Billing, Advance, and Sundries Account Policies;</p> <p>bh. No. 009/SK-DIR/12/21 on Standard Operating Procedures for Risk Profile Assessment;</p> <p>bi. No. 010/SK-DIR/12/21 on Policies and Procedures for Handling the Use of Power Users;</p> <p>bj. No. 011/SK-DIR/12/21 on Standard Operating Procedures for Bank Soundness Level;</p> <p>bk. No. 012/SK-DIR/12/21 on Standard Operating Procedures for Business Continuity Management (BCM);</p> <p>2. Product Review:</p> <p>a. No. 001/COMP-CMO/05/2021 on Electronic Document (E-Doc);</p> <p>b. No. 002/COMP-PD/05/2021 on Internet and Mobile Banking Development/Revamp;</p> <p>c. No. 01/COMP-LWP/BCR/06/2021 on Cooperation Agreement of Bancassurance Allianz Wealthlink Preferred Life between PT Bank Victoria International Tbk and PT Allianz Life Indonesia;</p> <p>d. No. 02/COMP-LWP/BCR/06/2021 on Cooperation Agreement of Bancassurance Allianz Assetlink Maxima between PT Bank Victoria International Tbk and PT Allianz Life Indonesia;</p> <p>e. No. 03/COMP-LWP/BCR/06/2021 on Cooperation Agreement of Bancassurance Allianz Life Secure PASTI between PT Bank Victoria International Tbk and PT Allianz Life Indonesia;</p> <p>f. No. 04/COMP-LWP/BCR/06/2021 on Marketing Cooperation of Proteksi 6 Mutual Funds between PT Bank Victoria International Tbk and PT Setiabudi Investment Management;</p> <p>g. No. 05/COMP-LWP/BCR/06/2021 on Cooperation Agreement of Mutual Funds between PT Bank Victoria and PT Trimegah;</p> <p>h. No. 01/COMP-PD/07/2021 on Development of New Activity Services or Products "Quick Response Indonesian Standard (QRIS)";</p> <p>i. No. 02/COMP-PD/07/2021 on Cooperation of New Activity with Victoria Investment Management for Lancar Merkurius;</p> <p>j. No. 01/COMP-LWP/RD/08/2021 on Review of Mutual Funds Cooperation for "Batavia Dana Obligasi Ultima" between PT Bank Victoria International Tbk and PT Batavia Prosperindo Aset Manajemen (BPAM);</p> <p>k. No. 02/COMP-LWP/RD/08/2021 on Review of Mutual Funds Cooperation for "Batavia Dana Saham" between PT Bank Victoria International Tbk and PT Batavia Prosperindo Aset Manajemen (BPAM);</p> <p>l. No. 03/COMP-LWP/RD/08/2021 on Review of Bancassurance Cooperation for "Batavia Dana Saham Optimal" between PT Bank Victoria International Tbk and PT Batavia Prosperindo Aset Manajemen (BPAM);</p> <p>m. No. 04/COMP-LWP/RD/08/2021 on Review of Mutual Funds Cooperation for "Batavia USD Balanced Asia" between PT Bank Victoria International Tbk and PT Batavia Prosperindo Aset Manajemen (BPAM);</p> <p>n. No. 05/COMP-LWP/RD/08/2021 on Review of Mutual Funds Cooperation for "Batavia Global ESG Sharia Equity USD" between PT Bank Victoria International Tbk and PT Batavia Prosperindo Aset Manajemen (BPAM);</p> <p>o. No. 06/COMP-ECDB/RD/08/2021 on Review of Onboarding Development Activities;</p> <p>p. No. 01/COMP-ECDB/RD/10/2021 on Review of New Activities or Product Services Development of "Cardless Withdrawal Feature".</p>
<p>Memantau secara berkala terhadap rencana dan realisasi/pencapaian bisnis Bank melalui rapat-rapat Komite.</p>	<p>Memantau rencana dan realisasi/pencapaian bisnis Bank melalui rapat-rapat Komite secara berkala.</p>
<p>Monitoring periodically on the Bank's plans and business realizations/achievements through Committee meetings.</p>	<p>Monitoring the Bank's business plans and realizations/achievements through periodic committee meetings.</p>
<p>Memantau <i>action plan</i> dan pelaksanaannya melalui rapat-rapat Komite.</p>	<p>Memantau pelaksanaan GCG secara rutin dan menyampaikannya dalam rapat Komite Pemantau dan Pelaksanaan GCG. Komite Pemantau dan Pelaksanaan GCG juga melaksanakan rapat sebanyak 4 (empat) kali selama tahun 2021 dan hasil rapat didokumentasikan dengan baik.</p>
<p>Monitoring the action plan and its implementation through Committee meetings.</p>	<p>Monitoring GCG implementation on a regular basis and presenting it in the GCG Implementation and Monitoring Committee meeting. The GCG Implementation and Monitoring Committee held 4 (four) meetings in 2021 and the meeting results were well documented.</p>



Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Menentukan aspek dan PIC/petugas dalam penyusunan GCG sesuai dengan bidang yang tercermin dari aspek-aspek GCG.</p> <p>Determining aspects and person in charge/PIC in drafting GCG in accordance with the areas reflected in GCG aspects.</p>	<p>Menetapkan aspek-aspek dan PIC/petugas dalam penyusunan GCG.</p> <p>Determined aspects and PIC/officer in preparing GCG.</p>
<p>Mengkoordinir pembuatan laporan pelaksanaan GCG yang dilengkapi dan didukung dengan <i>underlying</i>-nya.</p> <p>Coordinating the preparation of GCG implementation reports supplemented and supported by its underlying matters.</p>	<p>Menyampaikan kepada Bank Indonesia/Otoritas Jasa Keuangan atas progres tindak lanjut sampai dengan status "closed" atau "done".</p> <p>Submitting the follow-up progress to Bank Indonesia/Financial Services Authority until the status is "closed" or "done".</p>
<p>Memantau pelaporan pelaksanaan GCG Bank dan melakukan penilaian sendiri sesuai ketentuan berlaku.</p> <p>Monitoring the reporting of the Bank's GCG implementation and conducting self assessment in accordance with the prevailing provisions.</p>	<p>Melaksanakan penilaian sendiri berada pada kategori "Baik".</p> <p>Conducting self-assessment and is in "Good" category.</p>
<p>Memantau proses penyampaian dan pendokumentasian pelaporan kepada pihak-pihak yang disebutkan dalam ketentuan, di antaranya:</p> <ol style="list-style-type: none"> <li>1. Pemegang Saham;</li> <li>2. Bank Indonesia;</li> <li>3. Yayasan Lembaga Konsumen Indonesia (YLKI);</li> <li>4. Lembaga Pemeringkat di Indonesia;</li> <li>5. Asosiasi-asosiasi Bank di Indonesia;</li> <li>6. Lembaga Pengembangan Perbankan Indonesia (LPPI);</li> <li>7. 2 (dua) lembaga penelitian di bidang ekonomi dan keuangan; serta</li> <li>8. 2 (dua) majalah ekonomi dan keuangan.</li> </ol> <p>Monitoring the process of submission and documentation of reporting to the parties mentioned in the provisions, including:</p> <ol style="list-style-type: none"> <li>1. Shareholders;</li> <li>2. Bank Indonesia;</li> <li>3. Foundation of Indonesian Consumers Organization (YLKI);</li> <li>4. Indonesian Rating Agency;</li> <li>5. Indonesian Banking Associations;</li> <li>6. LPPI (Indonesian Banking Development Institute);</li> <li>7. 2 (two) research institutes in economics and financial sector; and</li> <li>8. 2 (two) economic and financial magazines.</li> </ol>	<p>Melakukan rekapitulasi komitmen Bank terhadap Bank Indonesia atau Otoritas Jasa Keuangan, termasuk temuan pemeriksaan serta mengomunikasikan komitmen tersebut secara berkesinambungan.</p> <p>Recapitulating the Bank's commitment to Bank Indonesia or Financial Services Authority, including audit findings and continuously communicating such commitment.</p>

### Struktur dan Keanggotaan Komite Pemantau dan Pelaksanaan GCG

Kedudukan Komite Pemantau dan Pelaksanaan GCG dalam struktur organisasi berada di bawah Direksi dengan Ketua Komite diangkat dan diberhentikan oleh Direksi. Informasi terkait susunan keanggotaan Komite Pemantau dan Pelaksanaan GCG Bank Victoria diungkapkan sebagai berikut.

### Structure and Membership of GCG Implementation and Monitoring Committee

GCG Implementation and Monitoring Committee's position in the organizational structure is under the Board of Directors and the Chairperson of the Committee is appointed and dismissed by the Board of Directors. Information related to the composition of Bank Victoria's GCG Implementation and Monitoring Committee is described hereinbelow.

Susunan Composition	Diisi oleh Held by
<p>Ketua Chairperson</p>	<p>Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management</p>
<p>Sekretaris Secretary</p>	<p>Kepala Divisi Compliance/Integrated, AML &amp; System Procedure Head of Compliance/Integrated, AML &amp; System Procedure Division</p>
<p>Anggota Tetap Permanent Members</p>	<ol style="list-style-type: none"> <li>1. Direksi</li> <li>2. Senior Executive Vice President (SEVP)</li> <li>3. Kepala Divisi SKAI/Integrated &amp; Anti Fraud</li> <li>4. Kepala Divisi Risk Management/Integrated</li> <li>5. Seluruh Kepala Divisi</li> </ol> <ol style="list-style-type: none"> <li>1. Board of Directors</li> <li>2. Senior Executive Vice President (SEVP)</li> <li>3. Head of SKAI/Integrated &amp; Anti Fraud Division</li> <li>4. Head of Risk Management/Integrated Division</li> <li>5. All Division Heads</li> </ol>

## Rapat Komite Pemantau dan Pelaksanaan GCG

Komite Pemantau dan Pelaksanaan GCG menyelenggarakan rapat secara berkala (bulanan) atau sewaktu-waktu sesuai dengan kebutuhan. Pada tahun 2021, Komite Pemantau dan Pelaksanaan GCG telah melaksanakan tugasnya melalui rapat yang dilaksanakan sebanyak 4 (empat) kali dengan rata-rata tingkat kehadiran 98,00%. Adapun agenda pembahasan rapat Komite Pemantau dan Pelaksanaan GCG dijelaskan sebagai berikut.

## GCG Implementation and Monitoring Committee Meeting

The GCG Implementation and Monitoring Committee conducts meeting on a regular basis (monthly) or at any time necessary. In 2021, the GCG Implementation and Monitoring Committee performed its duties through the meetings held for 4 (four) times with an average attendance rate of 98.00%. The agenda for discussion of GCG Implementation and Monitoring Committee meeting is explained as follows.

Tanggal Rapat	Agenda	Meeting Date
26 Januari 2021	<ol style="list-style-type: none"> <li>1. Temuan Otoritas Jasa Keuangan tahun 2020 kantor cabang yang telah selesai;</li> <li>2. Temuan Otoritas Jasa Keuangan tahun 2020 kantor pusat yang masih belum selesai;</li> <li>3. Pokok-pokok temuan Otoritas Jasa Keuangan tahun 2020;</li> <li>4. Progres <i>alert system terkait monitoring</i> kewajiban pelaporan Bank;</li> <li>5. Progres <i>system GoAML</i>;</li> <li>6. Denda; dan</li> <li>7. <i>Fraud</i>.</li> </ol> <ol style="list-style-type: none"> <li>1. Financial Services Authority's 2020 findings in the branch offices which were resolved;</li> <li>2. Financial Services Authority's 2020 findings in the head office which were not yet resolved;</li> <li>3. Financial Services Authority's principal findings in 2020;</li> <li>4. Progress of alert system related to the monitoring of the Bank's reporting obligation;</li> <li>5. GoAML system progress;</li> <li>6. Penalty; and</li> <li>7. Fraud</li> </ol>	26 January 2021
20 April 2021	<ol style="list-style-type: none"> <li>1. Temuan Otoritas Jasa Keuangan tahun 2020 kantor cabang yang telah selesai;</li> <li>2. Temuan Otoritas Jasa Keuangan tahun 2020 kantor pusat yang masih belum selesai;</li> <li>3. Pokok-pokok temuan Otoritas Jasa Keuangan tahun 2020;</li> <li>4. Progres <i>alert system terkait monitoring</i> kewajiban pelaporan Bank;</li> <li>5. Denda; dan</li> <li>6. <i>Fraud</i>.</li> </ol>	20 April 2021
21 Juli 2021	<ol style="list-style-type: none"> <li>1. Temuan Otoritas Jasa Keuangan tahun 2020 kantor cabang yang telah selesai;</li> <li>2. Temuan Otoritas Jasa Keuangan tahun 2020 kantor pusat yang masih belum selesai;</li> <li>3. Pokok-pokok temuan Otoritas Jasa Keuangan tahun 2020;</li> <li>4. Progres <i>alert system terkait monitoring</i> kewajiban pelaporan Bank;</li> <li>5. Denda; dan</li> <li>6. <i>Fraud</i>.</li> </ol> <ol style="list-style-type: none"> <li>1. Findings of Financial Services Authority in 2020 of branch offices that have been settled;</li> <li>2. Findings of Financial Services Authority in 2020 of head office that have not been settled;</li> <li>3. Main findings of Financial Services Authority in 2020;</li> <li>4. Progress of alert system related to monitoring of the Bank's reporting obligations;</li> <li>5. Fines; and</li> <li>6. Fraud.</li> </ol>	21 July 2021
19 Oktober 2021	<ol style="list-style-type: none"> <li>1. Hasil temuan Otoritas Jasa Keuangan per 31 Januari 2021 Cabang Senayan yang telah selesai;</li> <li>2. Hasil temuan Otoritas Jasa Keuangan per 31 Januari 2021 Cabang Fatmawati yang telah selesai;</li> <li>3. Temuan cabang yang ditindaklanjuti oleh kantor pusat yang belum selesai;</li> <li>4. Temuan Otoritas Jasa Keuangan tahun 2020 yang masih belum selesai;</li> <li>5. Temuan Otoritas Jasa Keuangan tahun 2021 yang sedang berjalan ada beberapa kebijakan yang harus dimutakhirkan atau dibuat;</li> <li>6. Pokok-pokok temuan Otoritas Jasa Keuangan per 31 Januari 2021;</li> <li>7. Batas Maksimum Pemberian Kredit (BMPK);</li> <li>8. <i>Monitoring</i> sistem kewajiban pelaporan Bank;</li> <li>9. Denda; dan</li> <li>10. <i>Fraud</i>.</li> </ol> <ol style="list-style-type: none"> <li>1. Findings of Financial Services Authority per 31 January 2021 of Senayan branch office that have been settled;</li> <li>2. Findings of Financial Services Authority per 31 January 2021 of Fatmawati branch office that have been settled;</li> <li>3. Findings of branch offices that are followed up by the head office but have not been settled;</li> <li>4. Findings of Financial Services Authority in 2020 that have not been settled;</li> <li>5. Findings of Financial Services Authority in 2021 that are ongoing of which several policies must be updated or made;</li> <li>6. Main findings of Financial Services Authority per 31 January 2021;</li> <li>7. Legal Lending Limit;</li> <li>8. Monitoring the Bank's reporting obligation system;</li> <li>9. Fines; and</li> <li>10. Fraud.</li> </ol>	19 October 2021

## Komite Personalia

Komite Personalia merupakan Komite yang berfungsi untuk membantu Direksi dalam merumuskan kebijakan, mengawasi pelaksanaan kebijakan, memantau perkembangan dan kondisi ketenagakerjaan, serta memberikan saran-saran dan langkah perbaikan yang sesuai dengan peraturan ketenagakerjaan di perbankan dan Undang-Undang Ketenagakerjaan yang berlaku di Indonesia.

### Pedoman Komite Personalia

Dalam menjalankan tugas dan tanggung jawabnya, Komite Personalia mengacu pada Undang-Undang No. 13 Tahun 2003 tentang Ketenagakerjaan, serta peraturan turunannya.

### Tugas dan Tanggung Jawab Komite Personalia

Tugas dan tanggung jawab Komite Personalia beserta realisasinya pada tahun 2021 diuraikan sebagai berikut.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
Memberikan masukan kepada Direksi dalam merumuskan kebijakan ketenagakerjaan. Providing inputs to Board of Directors in formulating employment policies.	Memberikan masukan terkait kebijakan ketenagakerjaan yang tercantum dalam pedoman Kebijakan dan Prosedur <i>Human Capital Management</i> yang telah disahkan serta dimutakhirkan berdasarkan Surat Keputusan Direksi No. 014/SK-DIR/07/19 tanggal 30 Juli 2019. Providing input on labor policies listed in the guidelines for Human Capital Management Policies and Procedures, which have been validated and updated based on Board of Directors' Decision Letter No. 014/SK-DIR/07/19 dated 30 July 2019.
Mengawasi kebijakan yang berhubungan dengan karyawan agar dilaksanakan secara konsekuen dan konsisten. Overseeing employee-related policies to be consistently and consequently implemented.	Mengawasi kebijakan terkait karyawan, seperti mengelola, memonitor, dan melaksanakan: perencanaan, pengelolaan dan administrasi bidang rekrutmen, pendidikan dan pengembangan, administrasi gaji, kesejahteraan HC, serta pengadministrasian data HC. Monitored policies related to employees, such as managing, monitoring, and implementing: planning, managing, and administering the process of recruitment, education and development, salary administration, HC welfare, and administration of HC data.
Melakukan kajian terhadap kebijakan ketenagakerjaan Bank dan memberikan saran kepada Direksi apabila diperlukan perubahan kebijakan ketenagakerjaan Bank. Reviewing Bank's manpower policies and advising the Board of Directors if changes to the Bank's manpower policy are necessary.	Melaksanakan rapat untuk mengkaji kebijakan ketenagakerjaan Bank. Holding meeting to assess the Bank's employment policy.
Memantau dan mengevaluasi efektivitas setiap karyawan. Monitoring and evaluating the effectiveness of each employee.	Melaksanakan evaluasi secara berkala sesuai dengan <i>Key Performance Indicator (KPI)</i> yang disepakati. Conducted periodic evaluations according to the agreed Key Performance Indicator (KPI).
Memberikan masukan dan solusi untuk hambatan dan masalah yang terjadi terkait dengan ketenagakerjaan Bank. Providing inputs and solutions for the obstacles and problems that occur related to the Bank's employment.	Memberikan masukan dan solusi apabila terdapat masalah terkait dengan ketenagakerjaan Bank. Provided input and solutions in the event that there were problems related to Bank employment.

### Struktur dan Keanggotaan Komite Personalia

Kedudukan Komite Personalia dalam struktur organisasi berada di bawah Direksi dengan Ketua Komite diangkat dan diberhentikan oleh Direksi. Saat ini, Komite Personalia diangkat berdasarkan Surat Keputusan Direktur No. 008/SK-DIR/03/19 tanggal 27 Maret 2019. Adapun keanggotaan Komite Personalia Bank untuk periode 2021 diungkapkan sebagai berikut.

## Personnel Committee

The Personnel Committee is a Committee having the function to assist the Board of Directors in formulating policies, overseeing policy implementation, monitoring employment progress and conditions, and advising suggestions and remedial measures in line with the labor regulations in banking and applicable Manpower Laws in Indonesia.

### Personnel Committee Charter

In performing its duties and responsibilities, the HR Committee refers to Law No. 13 of 2003 on Manpower, and its derivative regulations.

### Duties and Responsibilities of the Personnel Committee

Below are the duties and responsibilities of Personnel Committee as well as the realization in 2021.

### Structure and Composition of the Personnel Committee

Personnel Committee's position in the organizational structure is under the Board of Directors and the Chairperson of the Committee is appointed and dismissed by the Board of Directors. The current Personnel Committee was appointed based on Board of Directors' Decision Letter No. 008/SK-DIR/03/19 dated 27 March 2019. Composition of the Bank's HR Committee for 2021 period is as follows.

Susunan Composition	Diisi oleh Held by
Ketua Chairperson	Direktur Utama President Director
Anggota Member	<ol style="list-style-type: none"> <li>1. Wakil Presiden Direktur Utama</li> <li>2. Direktur Kepatuhan dan Manajemen Risiko</li> <li>3. Direktur Bisnis</li> <li>4. Kepala Divisi <i>Human Capital Management &amp; General Affair</i></li> </ol> <ol style="list-style-type: none"> <li>1. Deputy President Director</li> <li>2. Director of Compliance and Risk Management</li> <li>3. Director of Business</li> <li>4. Head of Human Capital Management &amp; General Affairs Division</li> </ol>

### Rapat Komite Personalialia

Komite Personalialia mengadakan rapat sekurang-kurangnya 3 (tiga) kali dalam 1 (satu) tahun. Pada tahun 2021, Komite Personalialia telah melaksanakan tugasnya melalui rapat yang dilaksanakan sebanyak 4 (empat) kali dengan rata-rata tingkat kehadiran 100,00%. Adapun agenda pembahasan rapat Komite Personalialia diuraikan pada tabel berikut.

### Personnel Committe Meeting

Personnel Committee holds at least 3 (three) meetings in 1 (one) year. In 2021, the Personnel Committee performed its duties through the meetings held for 4 (four) times with an average attendance rate of 100.00%. The agenda for discussion of Personnel Committee meeting is described in the following table.

Tanggal Rapat	Agenda	Meeting Date
31 Maret 2021	<ol style="list-style-type: none"> <li>1. Penggantian Kepala <i>Commercial Banking Center</i>; dan</li> <li>2. Penyesuaian <i>Branch Manager</i> Kantor Cabang Pembantu Mas.</li> </ol> <ol style="list-style-type: none"> <li>1. Replacement of Head of Commercial Banking Center; and</li> <li>2. Refreshment of Branch Manager of Cempaka Mas Sub-branch Office.</li> </ol>	31 March 2021
8 November 2021	<ol style="list-style-type: none"> <li>1. Pengunduran diri <i>SEVP Finance, Accounting &amp; Strategic Performance Management</i> dan memutuskan penggantinya;</li> <li>2. Usulan penambahan penasihat di bidang akuntansi; dan</li> <li>3. Berakhirnya masa percobaan <i>Branch Manager</i> Kantor Cabang Utama Semarang.</li> </ol> <ol style="list-style-type: none"> <li>1. Resignation of <i>SEVP Finance, Accounting &amp; Strategic Performance Management</i> and decide on the successor;</li> <li>2. Suggestions for additional advisors in accounting field; and</li> <li>3. The end of probation period for Branch Manager of Semarang Main Branch Office.</li> </ol>	8 November 2021
14 Desember 2021	<ol style="list-style-type: none"> <li>1. Pengadaan program <i>Human Resource Information System (HRIS)</i>;</li> <li>2. Pelaksanaan sertifikasi sistem manajemen anti penyuapan ISO 37001:2016;</li> <li>3. Pengadaan kelengkapan sarana <i>training</i> (2 (dua) laptop Asus); dan</li> </ol> <ol style="list-style-type: none"> <li>1. Procurement of Human Resource Information System (HRIS) program;</li> <li>2. Implementation of ISO 37001:2016 anti-bribery management system certification; dan</li> <li>3. Procurement of complete training facilities (2(two) Asus laptops).</li> </ol>	14 December 2021
21 Desember 2021	<ol style="list-style-type: none"> <li>1. <i>Eksternal fraud</i> di Cabang Bali pada 10 Desember 2021;</li> <li>2. Karyawan yang memasuki usia pensiun tahun 2022; dan</li> <li>3. Perekrutan <i>Chief Marketing Officer Vice Division Head</i>.</li> </ol> <ol style="list-style-type: none"> <li>1. External fraud at Bali Branch Office on 10 December 2021;</li> <li>2. Employees entering retirement age in 2022; and</li> <li>3. Recruitment of Chief Marketing Officer Vice Division Head.</li> </ol>	21 December 2021

### Komite Pengadaan

Komite Pengadaan merupakan Komite yang berfungsi membantu Direksi dalam memberikan masukan untuk hal-hal yang penting dan relevan dalam perumusan Kebijakan Pengadaan Barang dan Jasa, serta memberikan persetujuan untuk setiap pengadaan barang dan jasa.

### Pedoman Komite Pengadaan

Dalam menjalankan tugas dan tanggung jawabnya, Komite Pengadaan berpedoman pada Surat Keputusan Direksi No. 016/SK-DIR/02/20 tanggal 27 Februari 2020 tentang Komite Pengadaan PT Bank Victoria International Tbk.

### Procurement Committee

The Procurement Committee is a Committee that assists the Board of Directors in providing inputs for important and relevant matters in the formulation of Policies of Procurement of Goods and Services, as well as to provide approval for every procurement of goods and services.

### Procurement Committee Charter

In carrying out its duties and responsibilities, the Procurement Committee refers to the Board of Directors' Decision Letter No. 016/SK-DIR/02/20 dated 27 February 2020 on Procurement Committee of PT Bank Victoria international Tbk.

## Tugas dan Tanggung Jawab Komite Pengadaan

Tugas dan tanggung jawab Komite Pengadaan beserta realisasinya di tahun 2021 dijelaskan pada tabel berikut.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
Meminta informasi untuk hal-hal yang diperlukan terkait pengadaan barang dan jasa dari berbagai pihak, baik internal maupun eksternal. Asking for information on necessary matters related to the procurement of goods and services from various parties, both internal and external.	Meminta informasi kepada divisi/cabang/vendor atas rencana pengadaan barang dan jasa. Requested information from division/branch/vendor for the procurement plan for goods and services.
Memberikan persetujuan terhadap pengajuan pengadaan barang dan jasa. Providing approval on the procurement of goods and services.	Melaksanakan kegiatan pengadaan barang dan jasa sebanyak 11 (sebelas) kegiatan dengan realisasi biaya sebesar Rp34.716.752.160,-. Carried out 11 (eleven) goods and services procurement activities with an actual cost of Rp34,716,752,160.
Mengajukan persetujuan kepada Dewan Komisaris terhadap pengadaan barang/dan jasa dengan nilai/harga minimum sesuai yang diatur pada Anggaran Dasar Bank. Applying for approval to the Board of Commissioners on procurement of goods and services with minimum value/price as regulated in the Company's Articles of Association.	Di tahun 2021, tidak terdapat pengadaan barang dan jasa dengan nilai/harga minimum sesuai yang diatur pada Anggaran Dasar. In 2021, there were no procurement of goods and services with minimum value/price regulated in the Articles of Association.
Memberikan masukan kepada Direksi terkait hal-hal penting dan relevan dalam perumusan kebijakan pengadaan barang dan jasa sehingga proses pengadaan barang dan jasa dilakukan secara transparan, objektif, efektif, dan efisien. Providing inputs to the Board of Directors regarding important and relevant matters in the formulation of procurement policies of goods and services so that the procurement process of goods and services is done in a transparent, objective, effective, and efficient manner.	Memberikan masukan kepada Direksi terkait hal-hal penting dan relevan dalam perumusan kebijakan pengadaan barang dan jasa, sehingga proses pengadaan barang dan jasa dilakukan secara transparan, objektif, efektif, dan efisien. Provided inputs to the Board of Directors related to important and relevant matters in terms of formulating policies for procurement of goods and services, so that the process of procurement of goods and services was conducted transparently, objectively, effectively, and efficiently.

## Struktur dan Keanggotaan Komite Pengadaan

Kedudukan Komite Pengadaan dalam struktur organisasi berada di bawah Direksi. Susunan komposisi Komite Pengadaan diungkapkan sebagai berikut.

Susunan Composition	Diisi oleh Held by
Ketua Chairperson	Wakil Direktur Utama Deputy President Director
Anggota Member	1. Direktur Utama 2. Direktur 3. Senior EVP (Executive Vice President)  1. President Director 2. Director 3. Senior EVP (Executive Vice President)

## Duties and Responsibilities of the Procurement Committee

Duties and responsibilities of the Procurement Committee including the realization in 2021 are as listed in table below.

## Structure and Composition of the Procurement Committee

Procurement Committee's position in the organizational structure is under the Board of Directors. Composition of the Procurement Committee is as disclosed below.

## Rapat Komite Pengadaan

Komite Pengadaan minimal menyelenggarakan rapat sebanyak 1 (satu) kali dalam 2 (dua) bulan. Pada tahun 2021, Komite Pengadaan telah melaksanakan tugasnya melalui rapat yang dilaksanakan sebanyak 11 (sebelas) kali. Adapun agenda pembahasan rapat Komite Pengadaan diuraikan sebagai berikut.

## Procurement Committee Meeting

Procurement Committee holds meeting once every 2 (two) months. In 2021, the Procurement Committee performed their duties through 11 (eleven) meetings held. Agenda for the meeting discussions held by the Procurement Committee are as disclosed below.

Tanggal Rapat	Agenda	Meeting Date
27 Januari 2021	Perpanjangan sewa ruang kantor dan neon sign Kantor Cabang Pembantu Wisma Slipi. Lease extension of office Space and neon sign for Wisma Slipi Sub-branch Office.	27 January 2021
26 Februari 2021	1. Aplikasi <i>wealth management</i> ; 2. <i>Revamp mobile banking/internet banking</i> ; dan 3. Aplikasi <i>e-Document</i> .  1. Wealth management application; 2. Mobile banking/internet banking revamp; and 3. e-Document application.	26 February 2021

Tanggal Rapat	Agenda	Meeting Date
11 Mei 2021	<ol style="list-style-type: none"> <li>1. <i>Mobile monitoring application</i>;</li> <li>2. Aplikasi Rekening Dana Nasabah (RDN);</li> <li>3. <i>Webiste Leads – Victory</i>; dan</li> <li>4. <i>Penetration testing revamp internet Banking and mobile banking</i>.</li> </ol> <ol style="list-style-type: none"> <li>1. Mobile monitoring application;</li> <li>2. Customer Fund Account Application (RDN);</li> <li>3. Website Leads - Victory; and</li> <li>4. Penetration testing for internet Banking and mobile banking revamp.</li> </ol>	11 May 2021
19 Mei 2021	<p>Perpanjangan sewa Kantor Cabang Pembantu Cikini. Lease extension of office space for Cikini Sub-branch Office.</p>	19 May 2021
13 Juli 2021	<ol style="list-style-type: none"> <li>1. Perpanjangan sewa Kantor Cabang Solo;</li> <li>2. <i>Server simplivity</i>;</li> <li>3. Aplikasi e-KYC;</li> <li>4. <i>Video banking</i>;</li> <li>5. <i>Middleware</i>; dan</li> <li>6. <i>Hard token internet banking bisnis</i>.</li> </ol> <ol style="list-style-type: none"> <li>1. Lease extension for Solo Branch Office;</li> <li>2. Simplivity server;</li> <li>3. e-KYC application;</li> <li>4. Banking video;</li> <li>5. Middleware; and</li> <li>6. Hard token of internet banking business.</li> </ol>	13 July 2021
28 Juli 2021	<p>Pengadaan mobil operasional Direksi. Procurement of Board of Directors' operational vehicles.</p>	28 July 2021
3 September 2021	<ol style="list-style-type: none"> <li>1. Kartu ATM; dan</li> <li>2. <i>Renewal maintenance &amp; license 2 unit HSM pay 9000 – platinum support</i>.</li> </ol> <ol style="list-style-type: none"> <li>1. ATM card; and</li> <li>2. Renewal for maintenance &amp; license of 2 units HSM pay 9000 - platinum support</li> </ol>	3 September 2021
20 September 2021	<p>Kalender meja tahun 2022. 2022 Desk Calendars.</p>	20 September 2021
13 Oktober 2021	<ol style="list-style-type: none"> <li>1. Perpanjangan sewa kantor di gedung Bank Panin Senayan;</li> <li>2. <i>e-Money Bank Mandiri</i>;</li> <li>3. Hibah server kepada Direktorat Jenderal Kependudukan dan Pencatatan Sipil;</li> <li>4. <i>New proxy pengganti blue coat</i>;</li> <li>5. <i>Webiste Application Firewall (WAF)</i> untuk situs web dan <i>revamp internet Banking and mobile banking</i>;</li> <li>6. <i>Infra security internet Banking and mobile banking</i>;</li> <li>7. <i>Collocation link DC-DRC internet Banking and mobile banking</i>;</li> <li>8. CR antasena; dan</li> <li>9. <i>Renewal maintenance EDC</i>.</li> </ol> <ol style="list-style-type: none"> <li>1. Lease extension for office in Bank Panin Senayan building;</li> <li>2. Bank Mandiri's e-Monay;</li> <li>3. Server grant to the Directorate General of Population and Civil Registry;</li> <li>4. New Proxy, replacement of blue coat;</li> <li>5. Website Application Firewall (WAF) for web site and internet Banking and mobil banking revamp;</li> <li>6. Infra security of internet Banking and mobile banking;</li> <li>7. Collocation link DC-DRC internet Banking and mobile banking;</li> <li>8. CR antasena; and</li> <li>9. Maintenance renewal for EDC.</li> </ol>	13 October 2021
9 Desember 2021	<ol style="list-style-type: none"> <li>1. Perpanjangan sewa kantor cabang pembantu Indocement;</li> <li>2. <i>Renewal lisence and support splunk enterprise</i>; dan</li> <li>3. <i>Pentest bankwide infrastructure and digital banking tahun 2021</i>.</li> </ol> <ol style="list-style-type: none"> <li>1. Lease extension for sub-branch office in Indocement;</li> <li>2. Renewal of lLicense and support splunk enterprise; and</li> <li>3. Pentest bankwide infrastructure and digital banking for 2021.</li> </ol>	9 December 2021
21 Desember 2021	<p>Laporan Tahunan dan Laporan Keberlanjutan tahun 2021. 2021 Annual Report and Sustainability Report.</p>	21 December 2021

## Komite Produk

Komite Produk merupakan Komite yang bertugas membantu Direksi dalam memberikan arahan kebijakan yang berkaitan dengan pengelolaan produk *liabilities* dan *wealth management* yang akan dan/atau telah diterbitkan agar produk tersebut mampu bersaing dengan bank lain dan menghasilkan

## Product Committee

The Product Committee is a Committee that assists the Board of Directors in providing policy-related directives in connection with the management of liabilities and wealth management products that will and/or have been launched so that such products can compete with those of other banks and



keuntungan bagi Bank. Komite produk wajib memperhatikan kepentingan nasabah dan Bank, sekaligus menerapkan prinsip-prinsip kehati-hatian dan manajemen risiko dalam menjalankan tugasnya tersebut.

### Pedoman Komite Produk

Dalam menjalankan tugas dan tanggung jawabnya, Komite Produk mengacu pada Surat Keputusan Direksi No. 003/SK-DIR/10/2017 tanggal 9 Oktober 2017 tentang *Product Committee* PT Bank Victoria International Tbk.

### Tugas dan Tanggung Jawab Komite Produk

Tugas dan tanggung jawab Komite Produk beserta realisasinya di tahun 2021 dijelaskan sebagai berikut.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Memberikan masukan, pertimbangan, dan rekomendasi atas pengelolaan produk <i>asset and liabilities</i> kepada Direksi mulai dari rencana penerbitan, pengembangan dan/atau modifikasi produk, sampai dengan melakukan analisis/kajian terhadap <i>existing product</i>.</p> <p>Providing inputs, considerations, and recommendations on the management of <i>asset and liabilities</i> products to the Board of Directors starting from the plan of launching, developing, and/or modifying the products, to analyzing/reviewing the existing products.</p>	<p>Memberikan masukan, pertimbangan, dan rekomendasi atas pengelolaan produk <i>asset and liabilities</i> kepada Direksi mulai dari rencana penerbitan, pengembangan dan/atau modifikasi produk, sampai dengan melakukan analisis/kajian terhadap <i>existing product</i>.</p> <p>Provided input, consideration, and recommendation on the management of <i>asset and liabilities</i> products to the Board of Directors starting from the plan of launching, developing, and/or modifying the products, to analyzing/reviewing the existing product.</p>
<p>Mengawasi kebijakan produk agar dapat diterapkan dan dilaksanakan secara konsekuen, konsisten, dan bertanggung jawab, serta mencari solusi apabila terjadi hambatan atau kendala dalam penerapannya.</p> <p>Monitoring the product policy to be implemented and conducted consistently, consequently, and responsibly, and seeking solutions if there are any obstacles or constraints in its application.</p>	<p>Mengawasi kebijakan produk agar dapat diterapkan dan dilaksanakan secara konsekuen, konsisten, dan bertanggung jawab, serta mencari solusi apabila terjadi hambatan atau kendala dalam penerapannya.</p> <p>Monitored the product policy to be implemented and conducted consequently, consistently, and responsibly, and searched for solutions in the event that there are any obstacles or constraints in its application.</p>
<p>Memantau dan mengevaluasi risiko potensial yang akan terjadi terhadap:</p> <ol style="list-style-type: none"> <li>1. Perkembangan penjualan produk dan portofolio produk;</li> <li>2. Poin-poin pengawasan Kebijakan Produk;</li> <li>3. Strategi Kebijakan Produk; dan</li> <li>4. Portofolio produk untuk kemudian dipergunakan sebagai masukan dan saran kepada Direksi untuk menentukan langkah-langkah perbaikan yang diperlukan.</li> </ol> <p>Monitoring and evaluating potential risks that will occur to:</p> <ol style="list-style-type: none"> <li>1. The development of product sales and portfolio;</li> <li>2. Monitoring points of Product Policy;</li> <li>3. Product Policy Strategies; and</li> <li>4. Product portfolio is then used as input and advice to the Board of Directors to determine the necessary improvements.</li> </ol>	<p>Memantau dan mengevaluasi kinerja produk Bank, diantaranya:</p> <ol style="list-style-type: none"> <li>1. <i>Current account</i>;</li> <li>2. <i>Saving account</i>;</li> <li>3. <i>Time deposit</i>;</li> <li>4. <i>Bancassurance</i>;</li> <li>5. <i>Reksa dana</i>;</li> <li>6. Produk investasi pasar modal (Obligasi Ritel Indonesia (ORI), <i>Savings Bond Ritel</i> (SBR), dan lain-lain);</li> <li>7. <i>Internet banking</i> dan <i>mobile banking</i>, serta</li> <li>8. Pengembangan aplikasi penunjang.</li> </ol> <p>Monitoring and evaluating the Bank's product performance, among others:</p> <ol style="list-style-type: none"> <li>1. Current account;</li> <li>2. Saving account;</li> <li>3. Time deposit;</li> <li>4. Bancassurance;</li> <li>5. Mutual funds;</li> <li>6. Capital market investment products (Indonesian Retail Bonds (ORI), Retail Savings Bonds (SBR), and others);</li> <li>7. Internet banking and mobile banking, and</li> <li>8. Development of supporting application.</li> </ol>
<p>Tugas dan tanggung jawab Komite tidak termasuk hal-hal yang berkaitan dengan pengembangan program dan promosi produk.</p> <p>Duties and responsibilities of the Committee do not include matters related program development and product promotion.</p>	<p>Menjalankan tugas dan tanggung jawab sesuai kebijakan Bank.</p> <p>Carried out duties and responsibilities according to the Bank's policies.</p>

### Struktur dan Keanggotaan Komite Produk

Kedudukan Komite Produk dalam struktur organisasi berada di bawah Direksi dengan Ketua Komite diangkat dan diberhentikan oleh Direksi. Struktur dan keanggotaan Komite Produk diungkapkan sebagai berikut.

generate profits for the Bank. In performing these duties, the Committee must take into account the interests of the Bank and its customers and must apply prudential principles and risk management.

### Product Committee Charter

The Product Committee performs its duties and responsibilities based on the Board of Directors' Decision Letter No. 003/SKDIR/10/2017 dated 9 October 2017 on Product Committee of PT Bank Victoria International Tbk.

### Duties and Responsibilities of Product Committee

Duties and responsibilities of Product Committee and the realization in 2021 are as follows.

### Structure and Membership of the Product Committee

Product Committee's position in the organizational structure is under the Board of Directors and the Chairperson of Committee is appointed and dismissed by the Board of Directors. Product Committee's structure and composition is as disclosed below.



Susunan Composition	Diisi oleh Held by
Ketua <i>Steering Committee</i> Head of Steering Committee	Direktur Utama President Director
Anggota <i>Steering Committee</i> Members of Steering Committee	1. Wakil Direktur Utama 2. Direktur Bisnis 3. Direktur Kepatuhan dan Manajemen Risiko 1. Deputy President Director 2. Director of Business 3. Director of Compliance and Risk Management
Ketua <i>Product Committee</i> Head of Product Committee	SEVP of Customer Relationship Management
Sekretaris Secretary	Liabilities and Wealth Product Unit Head
Anggota Member	1. SEVP of Change Management Office 2. Information Technology Division Head 3. Operations Division Head 4. Compliance/Integrated, AML & System Procedure Division Head 5. Finance & Accounting Division Head 6. Change Management Office Division Head 7. Performance, Liabilities & Wealth Product Division Head 8. Branch Support & Development Unit Head 9. Marketing Communication Unit Head 10. E-Channel and Digital Transformation Unit Head 11. Business, Process, Policy, & Culture Transformation Unit Head

### Rapat Komite Produk

Komite Produk mengadakan rapat secara berkala atau sewaktu-waktu apabila diperlukan (*insidental*). Pada tahun 2021, Komite Produk telah melaksanakan tugasnya melalui rapat yang dilaksanakan sebanyak 1 (satu) kali dengan rata-rata tingkat kehadiran 100,00%. Adapun agenda pembahasan rapat Komite Produk diuraikan sebagai berikut.

### Product Committee Meeting

The Product Committee conducts meetings on a regular basis or at any time as necessary (*incidental*). In 2021, the Product Committee performed its duties through the meetings held for 1 (one) time with an average attendance rate of 100.00%. The agenda for discussion of Product Committee meeting is described as follows.

Tanggal Rapat	Agenda	Meeting Agenda
23 November 2021	<ol style="list-style-type: none"> <li>Pengaktifan kembali penjualan baru <i>Generali</i> (VIP Pro dan VIP Pro Invest);</li> <li><i>Update</i> proyek Aplikasi Reksadana WMS;</li> <li>Pengembangan Aplikasi Bank Persepsi;</li> <li>Pengembangan Aplikasi SBN Ritel;</li> <li>Pengembangan transaksi reksa dana melalui <i>internet banking</i> dan <i>mobile banking</i>;</li> <li>Penambahan kerja sama produk reksa dana dengan manajer investasi;</li> <li>Persetujuan Otoritas Jasa Keuangan untuk <i>bancassurance</i> kerja sama Bank Victoria;</li> <li>Informasi rasio CASA DEPO dana pihak ketiga per Januari, September, dan Oktober 2021;</li> <li>Informasi jenis-jenis <i>current account savings account</i> dan jumlah nasabah serta <i>outstanding</i> nominal;</li> <li>Informasi <i>rate</i> tabungan <i>maxima</i> per 1 Oktober 2021 serta posisi jumlah nasabah dan <i>outstanding maxima</i> per Januari-Oktober 2021; dan</li> <li>Informasi penjualan <i>wealth</i> dari awal Januari-Oktober 2021 yang didapat dari ORI019, SBR010, ORI020.</li> </ol>	23 November 2021

## Komite Investasi

Komite Investasi merupakan Komite di bawah Direksi yang berperan dalam memberikan arahan kebijakan yang berkaitan dengan investasi.

### Pedoman Komite Investasi

Dalam menjalankan tugas dan tanggung jawabnya, Komite Investasi mengacu pada Surat Keputusan Direksi No. 002/SK-DIR/06/17 tanggal 6 Juni 2017 tentang *Investment Committee* PT Bank Victoria International Tbk, dan Surat Edaran Direksi No. 008/SE-DIR/11/19 tentang Kepemilikan Berharga Komersial (SBK).

### Tugas dan Tanggung Jawab Komite Investasi

Tugas dan tanggung jawab Komite Investasi beserta realisasinya di tahun 2021 dijelaskan sebagai berikut.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<b>Memutuskan rencana investasi Divisi Treasury dalam mencapai optimalisasi imbal hasil pengelolaan portofolio treasury, khususnya mengenai:</b> Deciding on the investment plan of the Treasury Division in achieving optimum return on treasury portfolio management, particularly on:	
Kebijakan dan keputusan investasi Divisi Treasury. Investment policies and decisions of the Treasury Division.	Mengevaluasi kebijakan investasi dan pengelolaan portofolio. Evaluating investment policy and portfolio management.
Strategi pengelolaan portofolio treasury. Strategy of treasury portfolio management.	Mengevaluasi dan menetapkan komposisi keanggotaan Komite Investasi. Evaluating and determining the composition of the Investment Committee.

### Struktur dan Keanggotaan Komite Investasi

Kedudukan Komite Investasi dalam struktur organisasi berada di bawah Direksi, begitu juga pengangkatan dan pemberhentian Ketua Komite Investasi dilakukan oleh Direksi. Adapun keanggotaan Komite Investasi diungkapkan sebagai berikut.

Susunan Composition	Diisi oleh Held by
Ketua Chairperson	Wakil Direktur Utama Deputy President Director
Sekretaris Secretary	Kepala Divisi <i>International Banking</i> Head of International Banking Division
Anggota Member	<ol style="list-style-type: none"> <li>1. Komisaris Utama</li> <li>2. Direktur Utama</li> <li>3. Direktur Kepatuhan dan Manajemen Risiko</li> <li>4. Kepala Divisi <i>Credit Risk Review</i></li> <li>5. Kepala Divisi <i>Treasury</i></li> </ol> <ol style="list-style-type: none"> <li>1. President Commissioner</li> <li>2. President Director</li> <li>3. Director of Compliance and Risk Management</li> <li>4. Head of Credit Risk Review Division</li> <li>5. Head of Treasury Division</li> </ol>

### Rapat Komite Investasi

Sepanjang tahun 2021, Komite Investasi tidak mengadakan rapat, sehingga tidak terdapat informasi mengenai total rapat, rata-rata kehadiran rapat dan agenda rapat.

## Investment Committee

The Investment Committee is a committee under the Board of Directors with a role to provide policy direction related to investment.

### Investment Committee Charter

The Investment Committee performs its duties and responsibilities based on Board of Directors' Decision Letter No. 002/SK-DIR/06/2017 dated 6 June 2017 on Investment Committee of PT Bank Victoria International Tbk, and Board of Directors' Circular No. 008/SE-DIR/11/19 on Ownership of Commercial Securities (SBK).

### Duties and Responsibilities of the Investment Committee

Duties and responsibilities of Investment Committee including the realization in 2021 are as described below.

### Structure and Membership of the Investment Committee

The Investment Committee's position in the organizational structure is under the Board of Directors, and therefore, the Chairman of Investment Committee is appointed and dismissed by the Board of Directors. Investment Committee's structure is as disclosed below.

### Investment Committee Meeting

Throughout 2021, the Investment Committee did not hold any meeting, and therefore, there is no information on total meetings, average meeting attendance, and meeting agenda.

## Organ Pendukung Direksi Board of Directors' Supporting Organ

Dalam menjalankan tugasnya, Direksi dibantu oleh unit-unit yang berada di bawah Direksi. Unit-unit tersebut dibentuk berdasarkan kebutuhan bisnis serta peraturan perundang-undangan yang berlaku.

### Corporate Secretary

*Corporate Secretary* merupakan organ Direksi yang memiliki peranan penting dalam memastikan kelancaran komunikasi yang baik antara Bank dengan para pemangku kepentingan serta memastikan terselenggaranya penyampaian informasi secara tepat waktu dan akurat kepada seluruh pemangku kepentingan. Setiap informasi yang disampaikan oleh *Corporate Secretary* kepada masyarakat merupakan informasi resmi dari Bank sebagai emiten atau perusahaan publik.

#### Pedoman *Corporate Secretary*

Dasar pembentukan dan pedoman *Corporate Secretary* dalam melaksanakan tugasnya mengacu pada peraturan utama berikut.

1. Peraturan Otoritas Jasa Keuangan No. 35/POJK.04/2015 tentang Sekretaris Perusahaan Emiten atau Perusahaan Publik;
2. Kebijakan dan Prosedur *Corporate Affair* berdasarkan Surat Keputusan Direksi No. 021/SK-DIR/07/14 tanggal 21 Juli 2014 yang telah terbaru menjadi Standar Operasional Prosedur *Corporate Secretary* Surat Keputusan Direksi No. 003/SK-DIR/12/17 tanggal 13 Desember 2017; dan
3. Standar Operasional Prosedur Rapat Umum Pemegang Saham berdasarkan Surat Keputusan Direksi No. 004/SKDIR/04/17 tanggal 21 April 2017.

#### Tugas dan Tanggung Jawab *Corporate Secretary*

Tugas dan tanggung jawab *Corporate Secretary* diuraikan sebagai berikut.

In carrying out its duties, the Board of Directors is assisted by subordinating units. Those units are formed according to the requirement of business and prevailing laws and regulations.

### Corporate Secretary

Corporate Secretary is Board of Directors' organ having the role to ensure smooth and good communication between the Bank and its stakeholders and to ensure the establishment of timely and accurate information to all stakeholders. Each information published by the Corporate Secretary to the community constitute an official information from the Bank as an issuer or a public company.

#### Corporate Secretary Charter

The basis for the Corporate Secretary charter and establishment in performing its duties refers to the following main regulations.

1. Financial Services Authority Regulation No. 35/POJK.04/2015 on Corporate Secretary of Issuers or Public Companies;
2. Corporate Affair Policy and Procedure based on the Board of Directors' Decision Letter No. 021/SK-DIR/07/14 dated 21 July 2014 which was updated as Standard Operating Procedure of Corporate Secretary based on Board of Directors' Decision Letter No. 003/SK-DIR/12/17 dated 13 December 2017; and
3. Standard Operating Procedure of General Meeting of Shareholders in accordance with the Board of Directors' Decision Letter No. 004/SK-DIR/04/17 dated 21 April 2017.

#### Duties and Responsibilities of the Corporate Secretary

Duties and responsibilities of the Corporate Secretary are as described below.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
Mengikuti perkembangan pasar modal, khususnya peraturan-peraturan yang berlaku di bidang pasar modal. To follow the capital market development, especially regulations applicable in capital market sector.	Mengikuti perkembangan pasar modal, khususnya peraturan-peraturan yang berlaku di bidang pasar modal. Followed the capital market development, especially regulations applicable in capital market sector.
Memberikan pelayanan kepada masyarakat atas setiap Informasi yang dibutuhkan pemodal berkaitan dengan kondisi Bank. To provide services to the public for any information required by the investors in relation to the Bank's condition.	Membuat dan menyampaikan laporan, meliputi: 1. Laporan Internal a. Bulanan, berupa Memo Internal Perubahan Kepemilikan Saham; b. Tahunan, berupa Laporan Tahunan Divisi <i>Corporate Secretary</i> .

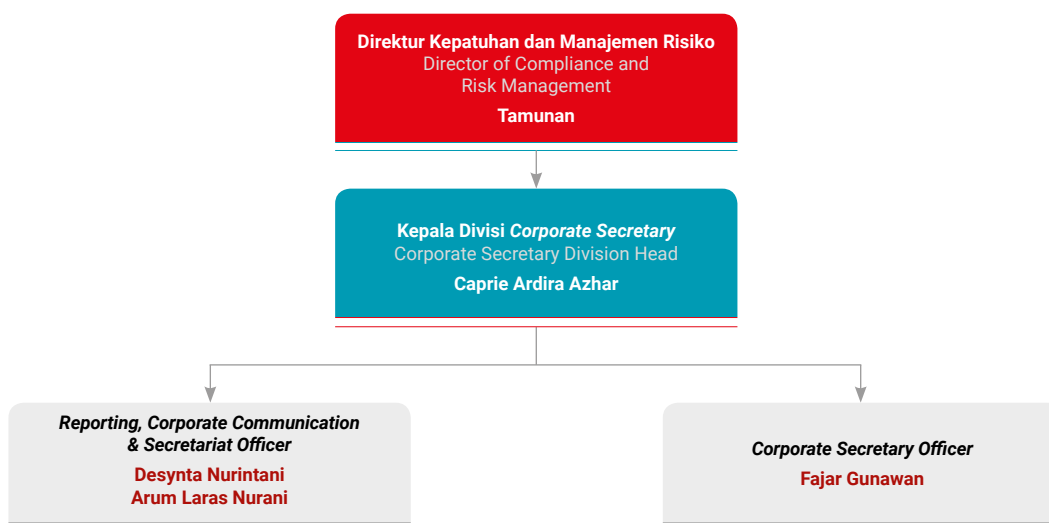
Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	<p>2. Laporan Eksternal</p> <ol style="list-style-type: none"> <li>Laporan Registrasi Pemegang Saham sebanyak 12 kali ke situs web Bursa Efek Indonesia;</li> <li>Laporan Keterbukaan Informasi pada situs web Bursa Efek Indonesia sebanyak 21 kali;</li> <li>Laporan Keuangan Tahunan kepada Departemen Perindustrian dan Perdagangan;</li> <li>Laporan Transaksi Afiliasi sebanyak 9 (sembilan) kali;</li> <li>Mengadakan RUPS Tahunan pada 25 Juni 2021 dan paparan publik pada 10 September 2021; serta</li> <li>Laporan hasil RUPS sebanyak 2 (dua) kali.</li> </ol> <p>Prepared and submitted reports, which include:</p> <ol style="list-style-type: none"> <li>Internal Report <ol style="list-style-type: none"> <li>Monthly, in the form of Internal Memo of Changes of Share Ownership;</li> <li>Annually, in the form of Annual Report of Corporate Secretary Division.</li> </ol> </li> <li>External Reports <ol style="list-style-type: none"> <li>Shareholder Registration Report for 12 times to Indonesia Stock Exchange website;</li> <li>Information Disclosure Report on Indonesia Stock Exchange website for 21 times;</li> <li>Annual Financial Statements to the Ministry of Industry and Trade;</li> <li>Affiliated Transactions Report for 9 (nine) times;</li> <li>Convening Annual GMS on 25 June 2021 and Public Expose on 10 September 2021; and</li> <li>Report of GMS result for 2 (two) times.</li> </ol> </li> </ol>
<p>Memberikan masukan kepada Direksi Bank untuk mematuhi ketentuan Undang-Undang No. 8 Tahun 1995 tentang Pasar Modal dan peraturan pelaksanaannya.</p> <p>To provide input to the Bank's Board of Directors to comply with the provisions of Law No. 8 of 1995 on Capital Market and its implementing regulations.</p>	<p>Memberikan masukan kepada Direksi melalui rapat yang diselenggarakan, yaitu:</p> <ol style="list-style-type: none"> <li>Rapat Direksi sebanyak 51 kali; serta</li> <li>Rapat Gabungan Dewan Komisaris dan Direksi sebanyak 12 kali.</li> </ol> <p>Provided input to the Board of Directors through the following meetings:</p> <ol style="list-style-type: none"> <li>Board of Directors' Meetings for 51 times; and</li> <li>Joint Meetings of Board of Commissioners and Board of Directors for 12 times.</li> </ol>
<p>Sebagai penghubung atau <i>contact person</i> antara Bank dengan Otoritas Jasa Keuangan serta masyarakat.</p> <p>To be the liaison or contact person between the Bank and Financial Services Authority and public.</p>	<p>Membuat dan menyampaikan surat-surat eksternal.</p> <p>Prepared and delivered external letters.</p>

### Struktur Corporate Secretary

Kedudukan *Corporate Secretary* berada langsung di bawah Direktur Kepatuhan dan Manajemen Risiko sehingga setiap bentuk pelaksanaan tugasnya dipertanggungjawabkan secara langsung kepada Direktur Kepatuhan dan Manajemen Risiko. Struktur *Corporate Secretary* Bank Victoria sebagai berikut.

### Structure of the Corporate Secretary

Corporate Secretary works under direct supervision of Director of Compliance and Risk Management, therefore, every implementation of its duties are to be reported directly to Director of Compliance and Risk Management. The structure of Bank Victoria's Corporate Secretary is as shown below.



### Satuan Kerja Audit Internal/*Integrated & Anti Fraud*

Satuan Kerja Audit Internal (SKAI)/*Integrated & Anti Fraud* adalah organ di bawah Direksi yang memiliki peran dalam melaksanakan kegiatan *assurance* dan *consulting* secara independen dan objektif yang dirancang untuk memberikan nilai tambah dan meningkatkan kualitas operasional Bank. SKAI/*Integrated & Anti Fraud* juga berperan dalam membantu Bank mencapai tujuannya melalui suatu pendekatan yang sistematis dan teratur untuk mengevaluasi dan meningkatkan efektivitas pengelolaan risiko dan pengendalian internal dalam proses *governance*.

### Pedoman SKAI/*Integrated & Anti Fraud*

Dalam melaksanakan tugas dan tanggung jawabnya, SKAI/*Integrated & Anti Fraud* mengacu pada beberapa pedoman yang senantiasa dikaji ulang dan dimutakhirkan sesuai kondisi dan perkembangan organisasi, serta sesuai perubahan peraturan perundang-undangan yang berlaku. Pedoman SKAI/*Integrated & Anti Fraud* Bank diuraikan sebagai berikut.

### Internal Audit Work Unit/*Integrated & Anti Fraud*

Internal Audit Work Unit (SKAI)/*Integrated & Anti-Fraud* is an organ under the Board of Directors whose role is to carry out *assurance* and *consulting* activities independently and objectively, and which are designed to provide added value and to improve the Bank's operations quality. SKAI/*Integrated & Anti Fraud* is also intended to help the Bank achieve its objectives through a systematic and regular approach to evaluate and improve the effectiveness of risk management and internal control in the governance process.

### SKAI/*Integrated & Anti Fraud* Charter

In performing its duties and responsibilities, the SKAI/*Integrated & Anti Fraud* refers to several documents that are consistently re-assessed and updated according to the organization's condition and development, and in accordance with amendments to the prevailing laws and regulations. The Bank's SKAI /*Integrated & Anti Fraud* Charter is as described below.

Pedoman SKAI/ <i>Integrated &amp; Anti Fraud</i> SKAI/ <i>Integrated &amp; Anti Fraud</i> Charter	Uraian Description
Piagam Audit Internal Internal Audit Charter	<p>SKAI/<i>Integrated &amp; Anti Fraud</i> memiliki Piagam Audit Internal sebagai pedoman utama pelaksanaan fungsinya. Piagam tersebut telah dimutakhirkan dan disahkan melalui Surat Keputusan Direksi No. 007/SK-DIR/05/19 tanggal 24 Mei 2019 tentang Piagam Audit Internal (<i>Internal Audit Charter</i>). Piagam Audit Internal berperan dalam penguatan peran dan tanggung jawab serta dasar keberadaan dan pelaksanaan tugas-tugas pengawasan bagi SKAI/<i>Integrated &amp; Anti Fraud</i>.</p> <p>SKAI/<i>Integrated &amp; Anti Fraud</i> has an Internal Audit Charter as the main guideline for the implementation of its functions. The Charter has been updated and established by the Board of Directors' Decision Letter No. 007/SK-DIR/05/19 dated 24 May 2019 on Internal Audit Charter. The Internal Audit Charter plays a role in strengthening the roles and responsibilities and serves as a basis for the existence and implementation of monitoring tasks for the SKAI/<i>Integrated &amp; Anti Fraud</i>.</p>
Sistem Prosedur dan Teknik Pemeriksaan Internal Systems Procedures, and Techniques of Internal Audit	<p>Sistem Prosedur dan Teknik Pemeriksaan Internal merupakan pedoman kerja teknis SKAI/<i>Integrated &amp; Anti Fraud</i>. Pedoman tersebut telah dimutakhirkan berdasarkan Surat Keputusan Direksi No. 007/SK-DIR/12/17 tanggal 21 Desember 2017 tentang Sistem Prosedur dan Teknik Pemeriksaan Internal.</p> <p>The Systems, Procedures, and Techniques of Internal Audit is the technical work guideline for the SKAI/<i>Integrated &amp; Anti Fraud</i>. The guidelines are updated based on the Board of Directors' Decision Letter No. 007/SK-DIR/12/17 dated 21 December 2017 on System, Procedure, and Technique of Internal Audit.</p>
Kebijakan SKAI/ <i>Integrated</i> SKAI/ <i>Integrated</i> Policy	<p>Dalam rangka implementasi SKAI/<i>Integrated</i> sebagaimana diamanatkan pada Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2014 tanggal 18 November 2014 dan Surat Edaran Otoritas Jasa Keuangan No. 15/SEOJK.03/2015 tanggal 25 Mei 2015 tentang Penerapan Tata Kelola Terintegrasi Bagi Konglomerasi Keuangan, maka Bank telah memiliki Kebijakan Satuan Kerja Audit Internal Terintegrasi yang tertuang pada Surat Keputusan Direksi No. 004/SK-DIR/11/15 tanggal 16 November 2015 dan telah dimutakhirkan berdasarkan Surat Keputusan Direksi No. 013/SK-DIR/03/18 tanggal 28 Maret 2018 tentang Kebijakan Satuan Kerja Audit Internal Terintegrasi (SKAI Terintegrasi) Grup Victoria.</p> <p>For the purpose of the implementation of SKAI/<i>Integrated</i> as mandated in the Financial Services Authority Regulation No. 18/POJK.03/2014 dated 18 November 2014 and Circular No. 15/SEOJK.03/2015 dated 25 May 2015 on the Implementation of Integrated Governance for Financial Conglomeration, the Bank already has a Policy on Integrated Internal Audit Work Unit as set out in the Board of Directors' Decision Letter No. 004/SK-DIR/11/15 dated 16 November 2015 and has been updated by the Board of Directors' Decision Letter No. 013/SK-DIR/03/18 dated 28 March 2018 on the Policy of Integrated Internal Audit Work Unit (Integrated SKAI) of Victoria Group.</p>

<b>Pedoman SKAI/Integrated &amp; Anti Fraud SKAI/Integrated &amp; Anti Fraud Charter</b>	<b>Uraian Description</b>
Standar Operasional Prosedur <i>Anti Fraud</i> Standard Operating Procedure for Anti Fraud	<p>Terkait pelaksanaan fungsi peningkatan terhadap efektivitas pengendalian internal dalam meminimalkan risiko <i>fraud</i>, SKAI/Integrated &amp; Anti Fraud telah memiliki Kebijakan dan Standar Operasional Prosedur Penerapan <i>Anti Fraud</i> dan Penerapan <i>Whistleblowing System</i> yang telah dimutakhirkan melalui Surat Keputusan Direksi No. 002/SK-DIR/08/20 tanggal 7 Agustus 2020 tentang Kebijakan dan Standar Operasional Prosedur Penerapan Strategi <i>Anti Fraud</i> PT Bank Victoria International Tbk.</p> <p>Related to the implementation of improvement function of the effectiveness of internal control to minimize fraud risk, the SKAI/Integrated &amp; Anti Fraud already has Policy and Standard Operating Procedure for Anti-Fraud Implementation and Whistleblowing Implementation, which has been updated by the Board of Directors' Decision Letter No. 002/SK-DIR/08/20 dated 7 August 2020 on Policy and Standard Operating Procedure for Anti Fraud Strategy Implementation of PT Bank Victoria International Tbk.</p>

### Tugas dan Tanggung Jawab SKAI/Integrated & Anti Fraud

Tugas dan tanggung jawab SKAI/Integrated & Anti Fraud meliputi:

1. Membantu tugas Direktur Utama dan Dewan Komisaris dalam melakukan pengawasan dengan cara menjabarkan secara operasional baik perencanaan, pelaksanaan maupun pemantauan hasil audit;
2. Menyusun dan melaksanakan perencanaan audit tahunan, antara lain analisis dan penilaian di bidang keuangan, akuntansi, operasional, perkreditan, dan kegiatan lain;
3. Mengidentifikasi segala kemungkinan untuk memperbaiki dan meningkatkan efisiensi penggunaan sumber daya dan dana;
4. Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkatan manajemen;
5. Memantau, menganalisis dan melaporkan pelaksanaan tindak lanjut perbaikan yang telah disarankan;
6. Memberikan penilaian tingkat keyakinan kualitas pelaksanaan tugas atas proses manajemen risiko, sistem pengendalian internal dan tata kelola usaha telah dilaksanakan secara cukup dan efektif di seluruh Unit Kerja Bank Victoria;
7. Membuat laporan hasil audit dan menyampaikan laporan tersebut kepada Direktur Utama dan Dewan Komisaris;
8. Bekerja sama dengan Komite Audit dalam melakukan pengawasan dan memonitor pelaksanaan tindak lanjut perbaikan atas temuan SKAI;
9. Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkatan manajemen; dan
10. Melaksanakan fungsi Audit Internal Terintegrasi dalam rangka konglomerasi keuangan Grup Victoria.

### Struktur Organisasi SKAI/Integrated & Anti Fraud

Struktur Organisasi SKAI/Integrated & Anti Fraud Bank Victoria berdasarkan Keputusan Direksi No. 003/SK-DIR/11/19 tanggal 6 November 2019 tentang Struktur Organisasi PT Bank Victoria International Tbk, yang diuraikan sebagai berikut.

### Duties and Responsibilities of the SKAI/Integrated & Anti Fraud

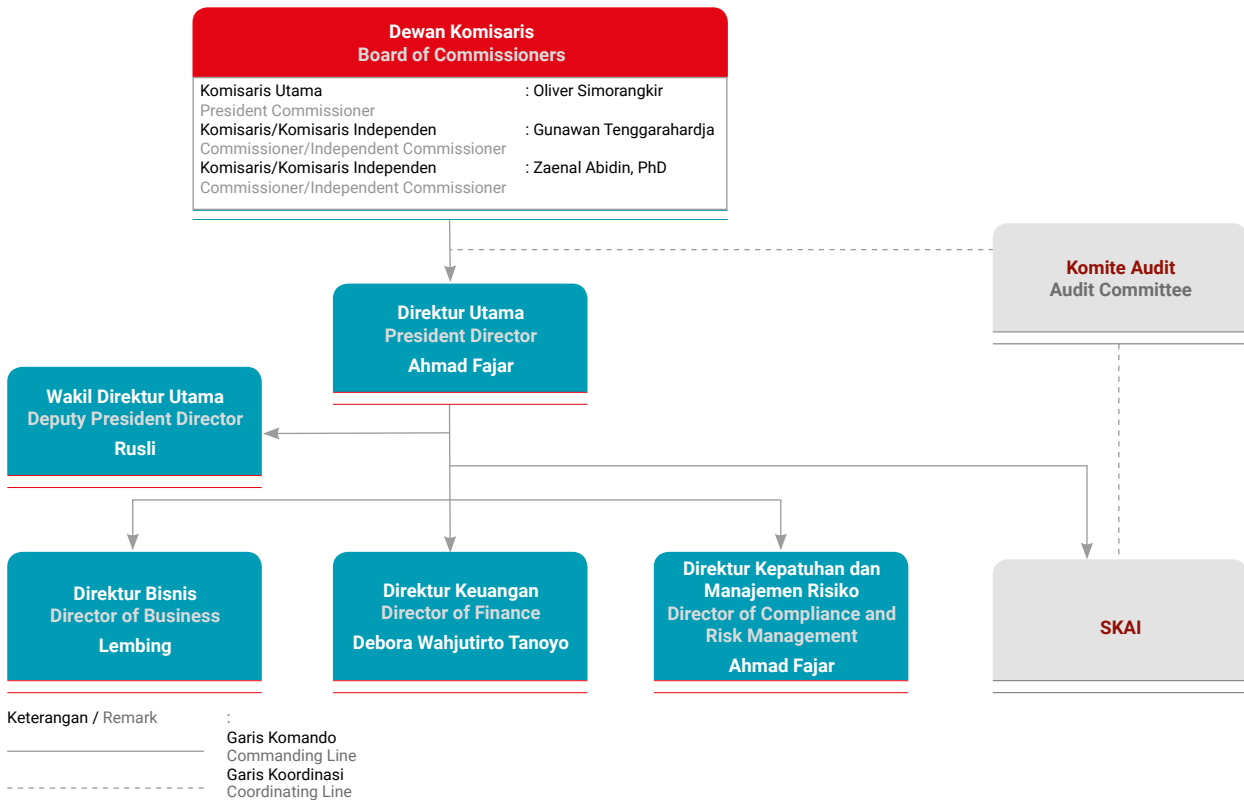
Duties and responsibilities of the SKAI /Integrated & Anti Fraud includes:

1. Assisting the President Director and Board of Commissioners in monitoring by detailing the operations of planning, implementation, or monitoring of the audit result;
2. Preparing and conducting the annual audit planning, among others, the analysis and assessment in the fields of finance, accounting, operations, credit, and other activities;
3. Identifying all possibilities to improve and enhance the efficient use of resources and funds;
4. Providing advice for improvement and objective information on activities audited at all management levels;
5. Monitoring, analyzing, and reporting the follow-up actions of the suggested corrective actions;
6. Assessing the confidence level of quality of duty implementation of the risk management process, internal control system, and business governance that has been implemented sufficiently and effectively in all Work Units of Bank Victoria;
7. Preparing the audit result report and submitting the report to the President Director and the Board of Commissioners;
8. Cooperating with the Audit Committee in supervising and monitoring the implementation of follow-up for improvements to SKAI findings;
9. Providing recommendations for improvement and objective information on activities audited at all management levels; and
10. Performing the functions of Integrated Internal Audit in the framework of Victoria Group's financial conglomeration.

### SKAI/Integrated & Anti Fraud Organizational Structure

SKAI/Integrated & Anti-Fraud Organizational Structure of Bank Victoria is based on the Board of Directors' Decision Letter No. 003/SK-DIR/11/19 dated 6 November 2019 on the Organizational Structure of PT Bank Victoria International Tbk, which is described as follows.





1. Kepala SKAI bertanggung Jawab secara langsung kepada Direktur Utama dan secara fungsional kepada Dewan Komisaris melalui Komite Audit. Hal ini untuk mendukung independensi dan menjamin kelancaran tugas dan tanggung jawab Audit Internal dalam menjalankan tugasnya;
2. SKAI harus mendapat dukungan dari manajemen dan Dewan Komisaris agar auditor dapat memperoleh kerja sama sepenuhnya dari *auditee* dalam melaksanakan pekerjaannya tanpa hambatan;
3. Kepala SKAI diangkat dan diberhentikan oleh Direktur Utama setelah mendapat persetujuan dari Dewan Komisaris dengan mempertimbangkan rekomendasi Komite Audit;
4. Komunikasi SKAI dengan Komite Audit adalah dalam bentuk koordinasi dalam hal terkait dengan pengembangan fungsi dan kinerja SKAI; serta
5. SKAI menyampaikan laporan kepada Direktur Utama dan Dewan Komisaris. Laporan yang disampaikan kepada Direktur Utama salinannya agar disampaikan kepada Dewan Komisaris melalui Komite Audit dan Direktur Kepatuhan serta Manajemen Risiko.

1. The Head of Internal Audit Work Unit (SKAI) is responsible directly to the President Director and functionally to the Board of Commissioners through the Audit Committee. This is to support the independency and to ensure that the duties and responsibilities of Internal Audit are conducted smoothly;
2. SKAI must have support from the management and Board of Commissioners so that the auditors can obtain full cooperation from the auditee in performing their work without obstacles;
3. The Head of SKAI is appointed and dismissed by the President Director after obtaining approval from the Board of Commissioners by considering recommendations from the Audit Committee;
4. SKAI communicates with Audit Committee in the form of coordination in matters related to developing SKAI functions and performance; and
5. SKAI submits reports to the President Director and Board of Commissioners. Reports submitted to the President Director must be copied to the Board of Commissioners through the Audit Committee and Director of Compliance and Risk Management.

### Kedudukan SKAI/Integrated & Anti Fraud

Kedudukan SKAI/*Integrated & Anti Fraud* berada langsung di bawah Direktur Utama. SKAI/*Integrated & Anti Fraud* bertindak independen dan bertanggung jawab secara langsung kepada Direktur Utama. Divisi ini memiliki jalur komunikasi langsung dengan Komite Audit dan Dewan Komisaris serta memiliki akses yang tidak terbatas terhadap seluruh aktivitas di Bank dan merupakan mitra manajemen dalam mewujudkan implementasi GCG.

### SKAI/Integrated & Anti Fraud Position

SKAI/*Integrated & Anti Fraud*'s answers directly to the President Director. SKAI/*Integrated & Anti Fraud* acts independently and is directly responsible to the President Director. This division has a direct communication channel with the Audit Committee and the Board of Commissioners, and has unlimited access to all activities in the Bank and is the management's partner in manifesting GCG implementation.



### Pihak yang Mengangkat dan Memberhentikan Kepala SKAI/Integrated & Anti Fraud

Kepala SKAI/Integrated & Anti Fraud diangkat dan diberhentikan oleh Direktur Utama atas persetujuan Dewan Komisaris. Pengangkatan dan pemberhentian tersebut dilaporkan kepada regulator.

### Komposisi SKAI/Integrated & Anti Fraud

Pada tahun 2021, jumlah personel SKAI/Integrated & Anti Fraud sebanyak 7 (tujuh) orang serta seluruhnya memiliki latar belakang pendidikan dan kompetensi yang memadai dalam menjalankan tugas sebagai auditor.

### Sertifikasi Profesi SKAI/Integrated & Anti Fraud

Sertifikasi profesi menjadi salah satu faktor penting dalam meningkatkan keahlian SKAI/Integrated & Anti Fraud serta menjadi parameter yang menjadi tolak ukur kemampuan dan keahlian SKAI/Integrated & Anti Fraud. Berikut sertifikasi profesi yang telah diperoleh personel SKAI/Integrated & Anti Fraud Bank.

Nama Name	Jabatan Position	Sertifikasi Certifications	Masa Berlaku Validity Period	Penyelenggara Organizer
Djoko Soendjojo	Kepala Divisi Head of Division	Level Auditor Auditor Level	29 Juni 2023 29 June 2023	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Ferry A	Kepala Unit Head of Unit	Level Auditor Auditor Level	24 Agustus 2023 24 August 2023	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Joel Krissata	Senior Officer	Level Auditor Auditor Level	24 November 2022	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Fadillah Syarif	Senior Officer	Level Auditor Auditor Level	7 November 2024	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Rifqi Dhia Ramadhan	Junior Officer	Level Auditor Auditor Level	27 November 2025	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Marni Marsirah	Junior Officer	Level Auditor Auditor Level	27 April 2023	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Jantamen Simanjuntak	Junior Officer	Belum Mengikuti Sertifikasi Has Not Obtained Certification Yet	N/A	N/A

### Kode Etik SKAI/Integrated & Anti Fraud

Kode Etik yang harus dipatuhi oleh semua anggota SKAI/Integrated & Anti Fraud Bank Victoria terdiri dari 4 (empat) prinsip yaitu:

### Party Appointing and Dismissing the Head of SKAI/Integrated & Anti Fraud

The SKAI/Integrated & Anti Fraud is appointed and dismissed by the President Director with approval from the Board of Commissioners. The appointment and dismissal are reported to the regulator.

### SKAI/Integrated & Anti Fraud Composition

In 2021, the number of SKAI/Integrated & Anti Fraud personnel was 7 (seven) people and all of them have adequate educational backgrounds and competencies in carrying out their duties as auditors.

### Professional Certification of SKAI/Integrated & Anti Fraud

Professional certification is one of the most important factors in enhancing SKAI/Integrated & Anti Fraud's expertise and is the parameter that becomes the benchmark for SKAI/Integrated & Anti Fraud competency and expertise. The following are professional certification obtained by the Bank's SKAI/Integrated & Anti Fraud personnel.

### Code of Ethics of SKAI/Integrated & Anti Fraud

Code of Ethics to be complied with by all members of Bank Victoria's SKAI/Integrated & Anti Fraud comprises 4 (four) principles, among others:

Prinsip Kode Etik Principles of Code of Ethics	Uraian Description
Prinsip Integritas Principle of Integrity	<ul style="list-style-type: none"> <li>• Dapat diandalkan, tegas, jujur, dan terpercaya;</li> <li>• Menjaga kerahasiaan informasi yang diperoleh dalam pelaksanaan tugas;</li> <li>• Menghindari benturan kepentingan; dan</li> <li>• Mengimplementasikan Kode Etik Audit Internal.</li> <li>• Reliable, firm, honest, and trustworthy;</li> <li>• Keep confidential information obtained in the implementation of duties;</li> <li>• Avoiding conflict of interest; and</li> <li>• Implementing Internal Audit's Code of Ethics.</li> </ul>

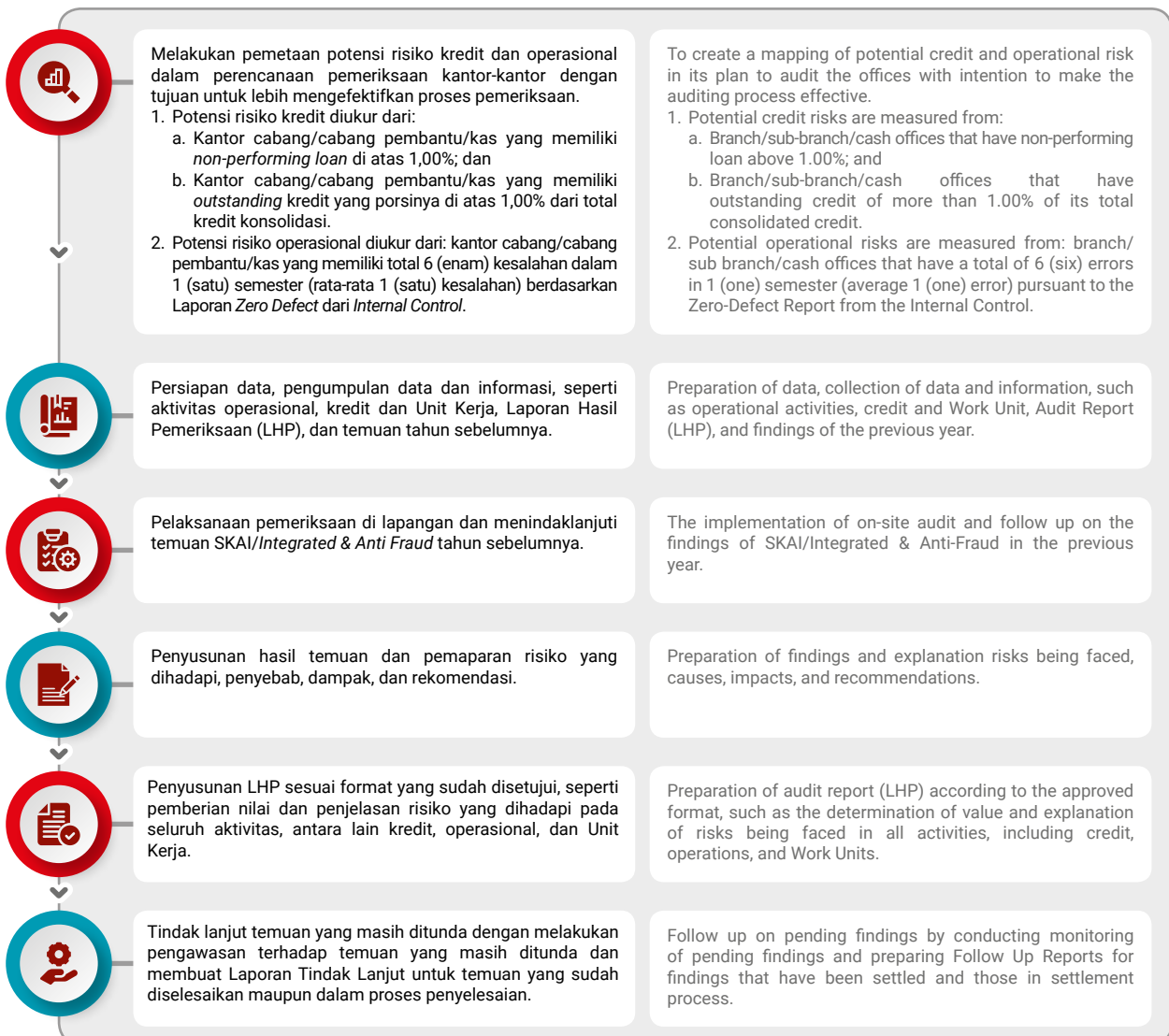
Prinsip Kode Etik Principles of Code of Ethics	Uraian Description
Prinsip Objektif Principle of Objective	Mempertakkan perilaku objektif dalam mengumpulkan, mengevaluasi, dan mengkomunikasikan informasi tentang aktivitas/kegiatan yang sedang diaudit. Dalam memberikan pendapat profesionalnya, Auditor Internal membuat penilaian secara independen dan tidak terpengaruh oleh kepentingan sendiri atau pendapat orang lain dalam memberikan pendapat profesionalnya. To practice objective behavior in collecting, evaluating and communicating information regarding activities being audited. In providing its professional opinion, Internal Auditor conducts assessment independently and must not be affected by its own interest or others' opinion.
Prinsip Rahasia Principle of Confidentiality	Menghargai nilai dari informasi yang diterima dan kepemilikan informasi serta tidak membocorkan informasi yang diperoleh tanpa mendapat kuasa kecuali demi hukum atau profesi. Appreciate the value of information received and ownership of information and does not disclose the information obtained without any authorization with exception to law or professional requirements.
Prinsip Kompetensi Principle of Competency	Menggunakan keterampilan, pengetahuan, keahlian, dan pengalaman yang dimiliki dalam melaksanakan audit serta meningkatkan secara berkesinambungan. To use skills, knowledge, expertise, and experiences owned in performing audit and to continuously enhance them.

### Metode Audit

Metode audit yang diterapkan Bank Victoria merupakan metode audit yang berbasis risiko (*risk based internal audit/ RBIA*) yang dijelaskan sebagai berikut.

### Audit Method

Audit method implemented by Bank Victoria is risk based internal audit (RBIA) as explained below.



### Rencana Kerja SKAI/Integrated & Anti Fraud

Pada tahun 2021, SKAI/Integrated & Anti Fraud telah menyusun Rencana Kerja Audit dan telah dilaporkan kepada Otoritas Jasa Keuangan dengan Surat No. 034/DIR-EKS/01/21 tentang Rencana Kerja Satuan Kerja Audit Intern (SKAI)/Integrated & Anti Fraud Tahun 2021 PT Bank Victoria International Tbk dengan sasaran yang akan dicapai oleh SKAI/Integrated & Anti Fraud pada tahun 2021, yaitu:

1. Melakukan pengujian dan evaluasi atas proses pengendalian Intern Bank secara independen dan objektif;
2. Menghasilkan Laporan Pemeriksaan yang mampu mendorong peningkatan kinerja yang sesuai dengan prinsip kehati-hatian;
3. Melakukan fungsi konsultatif terhadap aspek pengendalian Intern Bank dengan senantiasa menjunjung tinggi etika profesi; dan
4. Meningkatkan kompetensi dengan memberikan pelatihan-pelatihan sesuai kebutuhan.

Sedangkan, aktivitas utamanya sebagai berikut.

1. Pengembangan:
  - a. Untuk mendukung terlaksananya proses pemeriksaan yang berkualitas dan mempunyai nilai tambah bagi Pemegang Saham, maka sejalan dengan praktik terbaik yang berlaku umum, pada tahun 2021 SKAI akan melanjutkan program *risk-based audit* dengan beberapa kegiatan utama sebagai berikut.
    - 1) SDM SKAI
      - Secara berkelanjutan meningkatkan kompetensi staf SKAI (sertifikasi, *training*/pelatihan internal dan eksternal).
      - Mengimplementasikan praktik-praktik yang berorientasi pada *performance management*.
    - 2) Proses
      - Penyempurnaan proses pelaksanaan audit.
      - Pelaksanaan audit dengan fokus pada risiko yang signifikan.
    - 3) Sistem
      - Secara konsisten mengimplementasikan dan menyempurnakan metodologi Internal Audit (*rating system* dan *offsite audit*) dan sosialisasi metodologi Internal Audit tersebut.
    - 4) Infrastruktur
      - Menciptakan suasana kerja yang kondusif dan *learning environment* yang tinggi.
      - Pemenuhan fasilitas kerja yang memadai.
    - 5) Teknologi
      - Melakukan proses audit (*audit management system*) dengan bantuan teknologi.
      - Memanfaatkan komputerisasi dalam meningkatkan kualitas dan produktivitas pelaksanaan audit.

### SKAI/Integrated & Anti Fraud Work Program

In 2021, SKAI/Integrated & Anti-Fraud prepared an Audit Work Plan and was reported to the Financial Services Authority under Letter No. 034/DIR-EKS/01/21 on Work Plan of Internal Audit Work Unit (SKAI)/Integrated & Anti-Fraud of 2021 of PT Bank Victoria International Tbk with targets to be achieved by SKAI/Integrated & Anti-Fraud in 2021, which are:

1. Testing and evaluating the Bank's internal control process independently and objectively;
2. Generating an Audit Report that is able to encourage performance improvement in accordance with the principle of prudence;
3. Performing consultative function on aspects of internal control of the Bank by always upholding professional ethics; and
4. Improving competence by providing trainings as needed.

Meanwhile, the main activities are as follows.

1. Development:
  - a. Supporting the implementation of a quality audit process that has added value for Shareholders, in line with the generally accepted best practices. In 2021, SKAI will continue the risk-based audit program with the following main activities.
    - 1) SKAI's HR
      - Continually improving the competence of SKAI staffs (certification, internal and external trainings).
      - Implementing performance management-oriented practices.
    - 2) Process
      - Improving the audit process.
      - Conducting audits with focus on significant risks.
    - 3) System
      - Consistently implementing and refining the Internal Audit methodology (rating system and offsite audit), and disseminating such Internal Audit methodology.
    - 4) Infrastructure
      - Creating a conducive work atmosphere and a high learning environment.
      - Fulfilling adequate work facilities.
    - 5) Technology
      - Conducting audit process (audit management system) with the help of technology.
      - Utilizing computerization in improving audit quality and productivity.

b. Mengembangkan Pelaksanaan SKAI Terintegrasi  
Bank telah membuat dan menerbitkan Kebijakan SKAI Terintegrasi sebagai pedoman dalam pelaksanaannya, serta standar *template* sebagai basis *monitoring* dan pelaporan pelaksanaan hasil audit seluruh LJK. Implementasi hal tersebut akan terus dipantau, serta disesuaikan dengan kebutuhan, sehingga diharapkan dapat memberikan kontribusi yang positif terhadap pengelolaan Tata Kelola Terintegrasi.

c. *Anti Fraud*

Untuk lebih meningkatkan *awareness* karyawan terhadap *fraud*, maka akan dilakukan *improvement* peran dan fungsi *Anti Fraud* dengan melakukan pelatihan dan sosialisasi secara berkala.

2. Pemeriksaan:

Kegiatan pemeriksaan berbasis risiko (*risk based internal audit*) tahun 2021 dilakukan dengan memperhatikan hal-hal sebagai berikut.

a. Pemilihan Unit Kerja organisasi/aktivitas yang diperiksa dengan kriteria:

1) Untuk Unit Kerja Kantor Pusat akan dilakukan terhadap unit kerja yang berdampak signifikan terhadap keuangan/bisnis Bank serta yang memiliki risiko tinggi.

2) Untuk unit bisnis/kantor cabang dilakukan berdasarkan evaluasi:

a) Faktor yang Bersifat Umum (*General Factor*)

- *Size of transaction*;
- *Rapidity of growth*;
- *Change in key person*;
- Rentang waktu pemeriksaan internal audit sebelumnya;
- Hasil audit peringkat sebelumnya;
- Kejadian *fraud*;
- Hasil temuan Unit *Internal Control* (*zero defect* dan *TBO*); serta
- *Service quality* dan *service excellent*.

b) *Off-Site Assessment*

- Rencana kerja (*operating plan, implementation, and target/realization*);
- Organisasi dan SDM (pendidikan dan pelatihan);
- Hasil evaluasi atas aktivitas unit/cabang (*account maintenance, cash management, accounting proses and reporting*);
- Konsentrasi Kredit, *NPL Ratio, Non-Current*; dan
- *TBO* Dokumen.

b. Developing the Implementation of Integrated SKAI  
The Bank has made and issued an Integrated SKAI Policy as a guideline in its implementation, as well as a standard template as a basis for monitoring and reporting the audit results of the entire LJK. Implementation of such matter will continue to be monitored and adjusted to the needs, and expected to make a positive contribution to the management of Integrated Governance.

c. *Anti Fraud*

To further increase employee awareness of fraud, an *Anti Fraud* role and function will be improved by conducting regular training and dissemination.

2. Audit:

Risk based internal audit activities in 2021 will be carried out by considering the following matters.

a. The criteria to select which organizational Work Units/ activities to be audited:

1) For Head Office Work Units, the audit will be conducted for work units that have significant impact on the Bank's financial/business and those with high risks.

2) For business units/branch offices, the audit will be based on the following evaluations:

a) General Factors

- *Size of transaction*;
- *Rapidity of growth*;
- *Change in key person*;
- The time span of the previous internal audit;
- Rating of the previous audit results;
- Fraud events;
- Findings from internal control unit (*zero defect* and *TBO*); and
- *Service quality* and *service excellence*.

b) *Off-Site Assessment*

- Work plan (*operating plan, implementation, target/realization*);
- Organization and HR (education and training);
- Evaluation results of unit/branch's activities (*account maintenance, cash management, accounting process, and reporting*);
- Credit Concentration, *NPL Ratio, Non-Current*; and
- *TBO* Document.

b. Lingkup Pemeriksaan Tahun 2021

Setelah menetapkan parameter pemilihan unit organisasi/aktivitas sebagaimana disebut di atas, maka lingkup pemeriksaan tahun 2021 adalah:

- 1) Pemeriksaan kantor cabang, cabang pembantu, dan kas  
Melakukan pemeriksaan terhadap 52 kantor dari 52 cabang atau 100%.
- 2) Pemeriksaan Operasional Unit Kerja Kantor Pusat  
Melakukan pemeriksaan aktivitas operasional terhadap 12 objek pemeriksaan di Unit Kerja/Divisi.
- 3) Pemeriksaan LHPK dan KPDHN  
Penilaian aspek risiko dengan fokus pada risiko kepatuhan untuk pemeriksaan terhadap BIRTGS, BI-SSSS, BI-ETP (*Electronic Trading Platform*), SKN-BI, dan DHN-BI.
- 4) Pemeriksaan Khusus  
Melakukan pemeriksaan khusus terhadap temuan-temuan Otoritas Jasa Keuangan/Bank Indonesia dan temuan Akuntan Publik. Selain itu, dilakukan pemeriksaan khusus yang terkait dengan *case* atau *fraud* yang terjadi di Bank.

b. Audit Scopes in 2021

After establishing the parameters to select which organizational units/activities as mentioned above, the 2021 audit scopes are:

- 1) Audit of branch offices, sub-branch offices, and cash offices  
Examining 52 offices from 52 Branch Offices or 100%.
- 2) Audit of Operational Work Unit of Head Office  
  
Auditing the operational activities on 12 audit objects in the Work Unit/Division.
- 3) Audit of LHPK and KPDHN  
Assessing the risk aspects with a focus on compliance risks for audit of BI-RTGS, BI-SSSS, BIETP (*Electronic Trading Platform*), SKN-BI, and DHNBI.
- 4) Special Audit  
Conducting special audit on the findings of the Financial Services Authority/Bank Indonesia and the findings of the Public Accountant. In addition, special audit related to cases or fraud that occur at the Bank.

### Pelaksanaan Rencana Kerja SKAI/Integrated & Anti Fraud

Pada tahun 2021, realisasi rencana kerja audit yang telah dilaporkan kepada Manajemen sebagai berikut.

1. Surat No. 040/DIR-EKS/07/21 tanggal 19 Juli 2021 tentang Laporan Pokok-Pokok Hasil Audit Intern Semester I Tahun 2021 PT Bank Victoria International Tbk; dan
2. Surat No. 047/DIR-EKS/01/22 tanggal 24 Januari 2022 tentang Laporan Pokok-Pokok Hasil Audit Intern Semester II Tahun 2021 PT Bank Victoria International Tbk.

### Implementation of SKAI/Integrated & Anti Fraud Work Plan

In 2021, the realization of audit work plan that had been reported to Management is as follows.

1. Letter No. 040/DIR-EKS/07/21 dated 19 July 2021 regarding Report on Internal Audit Main Results for Semester I 2021 of PT Bank Victoria International Tbk; and
2. Letter No. 047/DIR-EKS/01/22 dated 24 January 2022 regarding Report on Internal Audit Main Results for Semester II 2021 of PT Bank Victoria International Tbk.

### Temuan dan Tindak Lanjut Hasil Audit

Pada tahun 2021, hasil audit telah menghasilkan sejumlah temuan yang telah dilaporkan kepada Dewan Komisaris dan Direksi. Temuan tersebut telah menghasilkan sejumlah rekomendasi yang perlu ditindaklanjuti oleh *auditee*. Selanjutnya, rekomendasi yang telah ditindaklanjuti dengan tuntas, akan diinformasikan kepada *auditee* dan Direksi, sedangkan rekomendasi yang belum selesai ditindaklanjuti dan masih berstatus *pending item*, akan dipantau penyelesaiannya oleh SKAI/Integrated & Anti Fraud. Temuan dan tindak lanjut audit di tahun 2021 sebagai berikut.

1. Pada semester I 2021, jumlah temuan sebanyak 187 temuan. 170 temuan atau 90,91% telah ditindaklanjuti dan sebanyak 17 temuan atau 9,09% masih dalam proses perbaikan dan telah diselesaikan pada triwulan III 2021; dan
2. Pada semester II 2021, jumlah temuan sebanyak 351 temuan. 312 temuan atau 88,89% telah ditindaklanjuti dan sebanyak 39 temuan atau 11,11% masih dalam proses perbaikan.

### Findings and Follow-Up on Audit Results

The audit carried out in 2021 resulted in a number of findings reported to the Board of Commissioners and Board of Directors. The findings resulted in a number of recommendations that need to be followed-up by the auditee. Completed recommendations will be informed to the auditee and Board of Directors, while uncompleted recommendations will remain in pending item status, and the completion will be monitored by SKAI/Integrated & Anti Fraud. Below are the findings and follow up in 2021.

1. In semester I 2021, the number of findings was 187 findings. 170 findings or 90.91% were followed up and 17 findings or 9.09% were still on improvement process and were settled in Quarter III 2021; and
2. In semester II 2021, the number of findings was 351 findings. 312 findings or 88.89% were followed up and 39 findings or 11.11% were still on improvement process.

## Akuntan Publik Public Accountant

Berdasarkan Peraturan Peraturan Otoritas Jasa Keuangan No. 32/POJK.03/2016 tentang perubahan atas No. 6/POJK.03/2015 tentang Transparansi dan Publikasi Laporan Bank, audit atas Laporan Keuangan Bank telah dilakukan oleh akuntan publik yang independen, kompeten, profesional dan objektif sesuai dengan Standar Profesional Akuntan Publik, serta perjanjian kerja dan ruang lingkup audit yang telah ditetapkan. Sementara itu, penunjukan kantor akuntan publik dan akuntan publik Bank dilakukan sesuai ketentuan Anggaran Dasar dan Peraturan Otoritas Jasa Keuangan No. 13/POJK.03/2017 tentang Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan, serta peraturan turunannya.

### Mekanisme dan Dasar Pertimbangan Penunjukan Akuntan Publik

Kantor akuntan publik dan akuntan publik ditunjuk melalui RUPS dengan mempertimbangkan usulan Dewan Komisaris berdasarkan rekomendasi Komite Audit. Dalam menyusun rekomendasi, Komite Audit mempertimbangkan:

1. Independensi kantor akuntan publik, akuntan publik, dan orang dalam kantor akuntan publik;
2. Ruang lingkup audit;
3. Imbalan jasa audit;
4. Keahlian dan pengalaman kantor akuntan publik, akuntan publik dan tim audit;
5. Metodologi, teknik, dan sarana audit yang digunakan;
6. Manfaat *fresh eyes perspectives* yang akan diperoleh melalui penggantian kantor akuntan publik, akuntan publik, dan tim audit;
7. Potensi risiko atas penggunaan jasa audit oleh kantor akuntan publik yang sama secara berturut-turut untuk kurun waktu yang cukup panjang; dan/atau
8. Hasil evaluasi terhadap pelaksanaan pemberian jasa audit atas informasi keuangan historis tahunan oleh kantor akuntan publik dan akuntan publik pada periode sebelumnya.

Hasil pertimbangan Komite Audit tersebut disampaikan kepada Dewan Komisaris dan Otoritas Jasa Keuangan melalui Surat Memo Komite Audit No. 024/KA/7/2021 tentang Rekomendasi Komite Audit dalam Penunjukan Akuntan Publik dan/atau Kantor Akuntan Publik untuk Melakukan Pekerjaan Asurans Laporan Keuangan PT Bank Victoria International Tbk Tahun Buku 2021 dan Memo Dewan Komisaris No. 003/KOM-DIR/7/2021 tentang Penunjukan Kantor Akuntan

Based on Financial Services Authority Regulation No. 32/POJK.03/2016 on Amendment to Regulation No. 06/POJK.03/2015 on Transparency and Publication of Bank Reports, audit on the Bank's Financial Statements is conducted by an independent, competent, professional, and objective public accountant in accordance with Public Accountant Professional Standards, as well as work agreement and audit scope agreed. Furthermore, public accounting firm and public accountant are appointed in accordance with the provisions of Articles of Association and Financial Services Authority Regulation No. 13/POJK.03/2017 on the Use of Services of Public Accountant and Public Accounting Firm in Financial Services Activities and its derivative regulations.

### Mechanism and Basis of Consideration to Appoint Public Accountant

Public accounting firm and public accountant are appointed by the GMS with due observance of the Board of Commissioners' suggestions based on recommendations from the Audit Committee. In preparing the recommendations, the Audit Committee considers the following matters:

1. Independence of public accounting firm, public accountant, and persons in the public accounting firm;
2. Audit scope;
3. Audit services fee;
4. Expertise and experience of public accounting firm, public accountant, and the audit team;
5. Methodology, technique, and facilities of audit used;
6. Benefit of fresh eyes perspectives that will be obtained through replacement of public accounting firm, public accountant, and the audit team;
7. Potential risks of using audit services from the same public accounting firm consecutively for a considerable period of time; and/or
8. Evaluation results on the implementation of audit services for annual historical financial information by public accounting firm and public accountant in the previous period.

Audit Committee's consideration results were submitted to the Board of Commissioners and Financial Services Authority through Audit Committee's Memo No. 024/KA/7/2021 on Audit Committee's Recommendation on the Appointment of Public Accountant and/or Public Accounting Firm to Perform Assurance Work on the Financial Statements of PT Bank Victoria International Tbk for the 2021 Fiscal Year and Board of Commissioners' Memo No. 003/KOM-DIR/7/2021 on Appointment of Public Accounting



Publik (KAP) dan/atau Akuntan Publik (AP), untuk Jasa Asurans atas Laporan Keuangan PT Bank Victoria International Tbk Tahun Buku 31 Desember 2021.

Firm (KAP) and/or Public Accountant (AP) for Assurance Work on the Financial Statements of PT Bank Victoria International Tbk for the Fiscal Year ended 31 December 2021.

## Informasi Jasa Assurance dan/atau Non assurance yang Diberikan Akuntan Publik atau Kantor Akuntan Publik dan/atau Afiliasi atau Jaringan

## Information on Assurance and/or Non-Assurance Services Provided by Public Accountant or Public Accounting Firm and/or its Affiliates or Network

### Periode Audit dan Nilai Imbal Jasa Akuntan

Akuntan publik dan kantor akuntan publik yang memberikan jasa audit keuangan dan nilai imbalan jasa (honorarium) pelaksanaan audit yang diuraikan sebagai berikut.

### Auditing Period and Accountant Service Honorarium

Public Accountant and Public Accounting firm providing financial audit service and their honorarium for the audit performed are as follows.

Uraian Description	Tahun Buku Fiscal Year				
	2021	2020	2019	2018	2017
Kantor Akuntan Publik Public Accounting Firm	<b>Purwanto, Sungkoro &amp; Surja (member of Ernst &amp; Young)</b>	Tanudiredja, Wibisana, Rintis dan Rekan ( <i>member of Pricewaterhouse Cooper</i> ) Tanudiredja, Wibisana, Rintis and Partners ( <i>member of Pricewaterhouse Cooper</i> )			
Akuntan Publik Public Accountant	<b>Yovita</b>	Jimmy Pangestu, SE	Jimmy Pangestu, SE	M Jusuf Wibisana, MEc, CPA	M Jusuf Wibisana, MEc, CPA
Nomor Izin Akuntan Publik Public Accountant License Number	<b>AP. 0242</b>	AP. 1124	AP. 1124	AP. 0222	AP. 0222
Masa Kontrak Contract Period	Januari-Desember January-December				
Biaya (Rp) Fee (Rp)	<b>1,550,000,000</b>	1,700,000,000	1,500,000,000	1,760,000,000	1,500,000,000

## Jasa Non-Audit yang Diberikan Akuntan Publik

Pada tahun 2021, Bank tidak menerima jasa lainnya dari kantor akuntan publik dan akuntan publik. Dengan demikian, tidak terdapat biaya yang dikeluarkan untuk jasa non-audit.

## Non-Auditing Services Provided by Public Accountant

In 2021, the Bank did not receive any other services from public accounting firm and public accountant. As such, there was no disbursement for non-audit expense.

## Koordinasi Akuntan Publik dengan Auditor Internal dan Komite Audit

Akuntan publik melakukan komunikasi secara intensif dengan auditor internal dan Komite Audit dalam menjalankan tugasnya. Komite Audit juga dapat memberikan saran, rekomendasi, dan pendapat yang bersifat independen terkait permasalahan yang dihadapi jika terjadi perbedaan pendapat antara akuntan publik dengan auditor internal.

## Coordination between Public Accountant and Internal Auditor and Audit Committee

Public Accountant communicates intensively with the internal auditor and the Audit Committee in carrying out its duties. The Audit Committee can also provide independent suggestions, recommendations, and opinion related to any issues in case of any dissenting opinion between the Public Accountant and the Internal Auditor.



## Sistem Pengendalian Internal Internal Control System

Sistem pengendalian internal merupakan mekanisme proses pengawasan yang ditetapkan oleh manajemen Bank secara berkesinambungan yang kualitas pelaksanaannya dipengaruhi oleh manajemen dan karyawan di setiap jenjang organisasi. Bank merancang sistem pengendalian internal untuk dapat memberikan keyakinan yang memadai serta menjaga dan mengamankan harta kekayaan Bank, menjamin tersedianya laporan yang akurat, meningkatkan kepatuhan terhadap ketentuan yang berlaku, mengurangi dampak kerugian keuangan, penyimpangan termasuk kecurangan (*fraud*) dan pelanggaran aspek kehati-hatian, serta meningkatkan efektivitas organisasi dan meningkatkan efisiensi biaya.

Internal Control System is a mechanism of control process established by the management of the Bank in a sustainable manner, of which the implementation is influenced by the management and employees in each level of organization. The Bank designed an internal control system in order to give adequate assurance and to maintain and secure assets, to guarantee the availability of accurate reports, to improve compliance to the prevailing regulations, to reduce financial adverse impact, deviation, including fraud and violation to the prudence aspects, and to enhance organizational effectiveness and to improve cost efficiency.

### Ruang Lingkup Pengendalian Internal

Implementasi sistem pengendalian internal di Bank mengacu pada Surat Edaran Otoritas Jasa Keuangan No. 35/SEOJK.03/2017 tentang Pedoman Standar Sistem Pengendalian Internal bagi Bank Umum. Berdasarkan peraturan tersebut, implementasi pengendalian internal yang handal dan efektif di Bank menjadi tanggung jawab semua pihak yang terlibat dalam organisasi Bank, meliputi:

1. Direksi  
Bertanggung jawab dalam menciptakan dan memelihara pengendalian internal yang efektif, serta memastikan bahwa sistem tersebut berjalan secara aman dan andal sesuai dengan tujuan pengendalian internal yang telah ditetapkan oleh Bank. Terkait hal ini, secara khusus, Direktur Kepatuhan dan Manajemen Risiko berperan aktif dalam mencegah adanya penyimpangan yang dilakukan oleh manajemen dalam menetapkan kebijakan berkaitan dengan prinsip kehati-hatian.
2. Dewan Komisaris  
Bertanggung jawab dalam melakukan pengawasan terhadap pelaksanaan pengendalian internal secara umum, termasuk kebijakan Direksi yang menetapkan pengendalian internal tersebut.
3. SKAI/*Integrated & Anti Fraud*  
Bertanggung jawab dalam mengevaluasi dan berperan aktif dalam meningkatkan efektivitas pengendalian internal secara berkesinambungan, berkaitan dengan pelaksanaan operasional Bank yang berpotensi menimbulkan kerugian dalam pencapaian sasaran yang telah ditetapkan oleh manajemen. Terkait hal ini, Bank senantiasa memastikan agar jalur pelaporan telah memadai dan auditor internal telah memiliki keahlian, khususnya terkait praktik dan penerapan penilaian risiko.

### Internal Control Scope

Implementation of internal control system at the Bank refers to Financial Services Authority Circular No. 35/SEOJK.03/2017 on Guidelines for Standards of Internal Control System for Commercial Banks. In accordance with the regulation, the implementation of reliable and effective internal control in the Bank is the responsibility of all parties involved in the Bank's organization as follows.

1. Board of Directors  
In charge of creating and maintaining effective internal control, and ensuring that the system runs safely and reliably in accordance with the internal control objectives specified by the Bank. In this regard, in particular, the Director of Compliance and Risk Management plays an active role in preventing any irregularities committed by the management in establishing prudential policies.
2. Board of Commissioners  
In charge of supervising the implementation of internal control in general, including the Board of Directors' policies in establishing such internal control.
3. SKAI/*Integrated & Anti Fraud*  
In charge of evaluating and taking an active role in improving the effectiveness of internal control on an ongoing basis, in relation to the implementation of the Bank's operations that may potentially incur losses in achieving the targets specified by the management. In this regard, the Bank consistently ensures that the reporting channels are adequate and that internal auditors have the expertise, particularly regarding the practice and application of risk assessments.

4. **Pejabat Eksekutif dan Karyawan**  
Bertanggung jawab dalam memahami dan melaksanakan pengendalian internal yang telah ditetapkan oleh manajemen Bank. Melalui pengendalian internal yang efektif, tanggung jawab Pejabat Eksekutif dan karyawan Bank akan meningkat, mendorong budaya risiko (*risk culture*) yang memadai, serta mempercepat proses identifikasi terhadap praktik perbankan yang tidak sehat dan terhadap organisasi melalui sistem deteksi dini yang efisien.
5. **Pihak Eksternal**  
Antara lain meliputi Otoritas Jasa Keuangan, auditor eksternal, dan nasabah Bank yang berkepentingan terhadap terlaksananya pengendalian internal yang andal dan efektif.

Secara khusus, Dewan Komisaris dan Direksi berperan dalam menjaga komitmen, perilaku, kepedulian, serta langkah yang tepat dalam mengimplementasikan pengendalian internal dalam seluruh kegiatan operasional Bank. Oleh karena itu, Dewan Komisaris dan Direksi telah menetapkan unsur-unsur lingkungan pengendalian yang meliputi:

1. Struktur organisasi yang memadai;
2. Gaya kepemimpinan dan filosofi manajemen Bank;
3. Integritas dan nilai-nilai etika, serta kompetensi seluruh karyawan;
4. Kebijakan dan prosedur *human capital* Bank;
5. Atensi dan arahan manajemen Bank dan Komite lainnya, seperti Komite Pemantau Risiko; serta
6. Faktor-faktor eksternal yang memengaruhi operasional Bank dan penerapan manajemen risiko.

Dalam menetapkan unsur-unsur lingkungan pengendalian dan mengimplementasikan pengendalian internal yang efektif, Bank mempertimbangkan beberapa faktor, antara lain:

1. Total aset;
2. Jenis produk dan aktivitas yang ditawarkan, termasuk produk dan aktivitas baru;
3. Kompleksitas operasional, termasuk jaringan kantor;
4. Profil risiko dari setiap kegiatan usaha;
5. Metode yang digunakan untuk pengolahan data dan teknologi informasi, serta metodologi yang diterapkan untuk pengukuran, pemantauan, dan pembatasan (limit) risiko; serta
6. Ketentuan dan peraturan perundang-undangan.

## Kesesuaian Pengendalian Internal dengan Kerangka COSO

Bank menerapkan pengendalian internal yang sesuai dengan *Internal Control Integrated Framework* yang dikembangkan oleh *The Committee of Sponsoring Organization of the Treadway Commission* (COSO) di tahun 2013. Kesesuaian pengendalian internal Bank Victoria dengan kerangka pengendalian internal menurut COSO khususnya terkait aspek utama berikut.

4. **Executive Officers and Employees**  
In charge of understanding and implementing the internal control established by the Bank's management. Through effective internal control, the responsibilities of the Executive Officers and Bank employees will improve and promote an adequate risk culture, as well as accelerate the process of identifying unhealthy banking practices and organization through an efficient early-detection system.

5. **External Parties**  
Among others include the Financial Services Authority, external auditors, and Bank's customers who have an interest in the implementation of reliable and effective internal controls.

In particular, the Board of Commissioners and Board of Directors are in charge of maintaining appropriate commitments, behaviors, concerns, and steps in implementing internal controls in the Bank's operational activities. Thus, the Board of Commissioners and Board of Directors have established elements of controlled environment which include:

1. Sufficient organizational structure;
2. Bank's leadership style and management philosophy;
3. Integrity and ethical values, as well as the competence of all employees;
4. Bank's human capital policies and procedures;
5. Attention and direction of the Bank's management and other Committees, such as Risk Monitoring Committee; and
6. External factors affecting the Bank's operations and the risk management implementation.

In determining the elements of the controlled environment and implementing effective internal controls, the Bank considers several factors, including:

1. Total assets;
2. The types of products and activities offered, including new products and activities;
3. Operational complexity, including office network;
4. Risk profile of each business activity;
5. Methods used for data and information technology processing, as well as methodology applied for risk measurement, monitoring, and limit; and
6. Provisions and laws and regulations.

## Conformity of Internal Control with COSO Framework

The Bank established internal control according to the Internal Control Integrated Framework developed by The Committee of Sponsoring Organizations of the Treadway Commission (COSO) in 2013. The conformity of Bank Victoria's internal control with COSO's internal control framework is particularly related to the following key aspects.

### Tujuan Pengendalian Internal The Purpose of Internal Control

<b>Tujuan Operasional</b> Berkaitan dengan peningkatan efektivitas efisiensi operasi terhadap penggunaan aset dan sumber daya lainnya dalam rangka melindungi Bank dari risiko kerugian.	<b>Operational Purpose</b> Related to improvement of operational effectiveness and efficiencies on the use of assets and other resources in order to protect the Bank from the risk of loss.
<b>Tujuan Pelaporan</b> Berkaitan dengan kepentingan pelaporan keuangan yang memenuhi kriteria andal, tepat waktu, transparan dan persyaratan lain yang ditetapkan oleh regulator maupun Bank.	<b>Reporting Purpose</b> Related to the interest of financial reporting that satisfies the criteria of reliable, timely, transparent, and other requirements stipulated by the regulators and the Bank.
<b>Tujuan Kepatuhan</b> Berkaitan dengan kepatuhan Bank terhadap hukum dan peraturan perundang-undangan yang berlaku.	<b>Compliance Purpose</b> Related to the Bank's compliance with the applicable laws and regulations.

### Unsur-Unsur Pengendalian Internal Internal Control Elements

<b>Lingkungan Pengendalian</b> Cerminan dari keseluruhan komitmen, perilaku, kepedulian, serta langkah-langkah Dewan Komisaris dan Direksi Bank dalam melaksanakan kegiatan pengendalian operasional Bank.	<b>The Controlled Environment</b> A reflection of the Bank's overall commitment, behavior, concern, and steps of the Bank's Board of Commissioners and Board of Directors in implementing the Bank's operational control activities.
<b>Penilaian Risiko</b> Serangkaian tindakan yang dilaksanakan oleh Direksi dalam rangka identifikasi, analisis dan menilai risiko yang dihadapi Bank dalam rangka pencapaian target yang ditetapkan.	<b>Risk Assessment</b> A series of actions performed by the Board of Directors to identify, analyze, and assess the risks faced by the Bank in achieving the targets specified.
<b>Kegiatan Pengendalian</b> Penetapan kebijakan, prosedur dan praktik pengendalian, serta proses verifikasi lebih dini untuk memastikan bahwa kebijakan dan prosedur tersebut secara konsisten dipatuhi, serta merupakan kegiatan yang tidak terpisahkan dari setiap fungsi atau kegiatan Bank sehari-hari.	<b>Controlled Activities</b> Establishment of policies, procedures, and control practices, and early verification process to ensure that such policies and procedures are consistently adhered to and constitute as an inseparable part from the Bank's daily functions or activities.
<b>Ketersediaan Informasi Internal dan Saluran Komunikasi</b> Ketersediaan informasi internal dan saluran komunikasi yang efektif yang diperlukan dalam pengambilan keputusan yang tepat dan dapat dipertanggungjawabkan, serta agar seluruh pejabat dan karyawan Bank sepenuhnya memahami dan mematuhi kebijakan dan prosedur yang berlaku dalam melaksanakan tugas dan tanggung jawabnya.	<b>Availability of Internal Information and Effective Communication Channels</b> Availability of internal information and effective communication channel is required for appropriate and accountable decision making, and to ensure that the Bank's officers and employees fully understand and comply with the applicable policies and procedures in carrying out their duties and responsibilities.
<b>Kegiatan Pemantauan</b> Proses penilaian/evaluasi atas aktivitas pemantauan efektivitas rancangan dan operasi struktur pengendalian internal dan kinerja manajemen dengan memastikan bahwa pelaksanaannya telah diperbaiki sesuai dengan keadaannya.	<b>Monitoring Activity</b> A process of assessment/evaluation of the monitoring activities of the effectiveness of the design and operation of internal control structure and management performance by ensuring that its implementation has been improved according to its condition.

## Komponen Pengendalian Internal

Komponen pengendalian internal Bank terdiri dari 5 (lima) yang saling berkaitan dengan uraian sebagai berikut.

1. **Pengawasan oleh Manajemen dan Budaya Pengendalian**  
 Dewan Komisaris dan Direksi Bank meyakini bahwa penerapan tata kelola perusahaan secara baik dan benar akan berpengaruh terhadap pencapaian kinerja yang baik dan peningkatan nilai perusahaan. Hal tersebut di antaranya diterapkan melalui pelaksanaan tanggung jawab oleh Dewan Komisaris dan Direksi dalam pengendalian internal yang diuraikan sebagai berikut.
  - a. Dewan Komisaris bertanggung jawab untuk:
    - 1) Mengesahkan dan mengkaji ulang secara berkala terhadap kebijakan dan strategi usaha Bank secara keseluruhan;
    - 2) Memahami risiko utama yang dihadapi Bank, menetapkan tingkat toleransi risiko, dan memastikan bahwa Direksi telah melakukan langkah-langkah yang diperlukan untuk mengidentifikasi, mengukur, memantau, dan mengendalikan risiko tersebut;

## Internal Control Components

The Bank's internal control consists of 5 (five) interrelated components as described below.

1. **Control by the Management and Control Culture**  
 The Board of Commissioners and Board of Directors believe that good performance and corporate value improvement will have influence on the achievement of good performance and enhancement of the Company's value. This is implemented, among others, through the responsibilities of the Board of Commissioners and Board of Directors in internal controls as described below.
  - a. The Board of Commissioners is responsible for:
    - 1) Vaidating and reviewing regularly the Bank's overall business policies and strategies;
    - 2) Understanding the main risks faced by the Bank, establishing the level of risk tolerance, and ensuring that the Board of Directors has taken the necessary steps to identify, measure, monitor, and control those risks;

- 3) Mengesahkan struktur organisasi; dan
  - 4) Memastikan bahwa Direksi telah memantau efektivitas pelaksanaan SPI.
- b. Direksi bertanggung jawab untuk:
- 1) Melaksanakan kebijakan dan strategi yang telah disetujui oleh Dewan Komisaris;
  - 2) Mengembangkan prosedur untuk mengidentifikasi, mengukur, memantau, dan mengendalikan risiko yang dihadapi Bank;
  - 3) Memelihara suatu struktur organisasi yang mencerminkan kewenangan, tanggung jawab, dan hubungan pelaporan yang jelas;
  - 4) Memastikan bahwa pendelegasian wewenang berjalan secara efektif yang didukung oleh penerapan akuntabilitas yang konsisten;
  - 5) Menetapkan kebijakan, strategi, dan prosedur pengendalian internal; serta
  - 6) Memantau kecukupan dan efektivitas dari SPI.

Dewan Komisaris dan Direksi dalam melaksanakan tanggung jawab tersebut mengemban tanggung jawab untuk meningkatkan etika kerja dan integritas yang tinggi dalam menciptakan budaya organisasi yang menekankan kepada seluruh karyawan mengenai pentingnya pengendalian internal yang berlaku di Bank. Hal ini antara lain dilakukan melalui penerapan:

- a. Dewan Komisaris dan Direksi sebagai panutan seluruh karyawan, memiliki komitmen pribadi yang tinggi terhadap pengembangan Bank yang sehat;
- b. Dewan Komisaris dan Direksi mengelola *Human Capital*, termasuk dalam proses penempatan karyawan yang sesuai dengan keterampilan, pengetahuan, dan perilaku; dan
- c. Dewan Komisaris dan Direksi meningkatkan kesadaran bagi seluruh karyawan Bank mengenai pentingnya efektivitas pelaksanaan tugas serta tanggung jawab masing-masing, dan selanjutnya karyawan mengomunikasikan kepada pihak manajemen yang terkait mengenai setiap permasalahan yang terjadi dalam kegiatan operasional Bank.

Seluruh kebijakan, standar, dan prosedur operasional didokumentasikan secara tertulis dan tersedia bagi setiap karyawan yang terkait guna mendukung efisiensi penerapan budaya pengendalian. Bank juga mengelola dan menghindari kebijakan dan praktik yang dapat mengakibatkan dorongan atau menciptakan peluang untuk melakukan penyimpangan atau pelanggaran dalam rangka memperkuat nilai-nilai etika.

## 2. Identifikasi dan Penilaian Risiko

Guna mengidentifikasi, menganalisis, dan menilai risiko yang dihadapi Bank dalam mencapai target yang ditetapkan, Direksi melakukan penilaian risiko. Dalam hal ini, Bank Victoria melakukan pemantauan secara kontinue dengan

- 3) Approving the organizational structure; and
  - 4) Ensuring that the Board of Directors has monitored the effectiveness of SPI implementation.
- b. The Board of Directors is responsible for:
- 1) Implementing policies and strategies approved by the Board of Commissioners;
  - 2) Developing procedures for identifying, measuring, monitoring, and controlling risks faced by the Bank;
  - 3) Maintaining an organizational structure that reflects clear authority, responsibility, and reporting relationships;
  - 4) Ensuring that authority delegation runs effectively and is supported by the consistent accountability implementation;
  - 5) Establishing policies, strategies, and internal control procedures; and
  - 6) Monitoring the adequacy and effectiveness of SPI.

In carrying out these responsibilities, the Board of Commissioners and Board of Directors assume the responsibility for improving work ethics and high integrity in creating an organizational culture that emphasizes all employees the importance of internal control applicable at the Bank. This is done, among others, through the implementation of:

- a. The Board of Commissioners and Board of Directors as role models to all employees have high personal commitment to the development of a sound Bank;
- b. The Board of Commissioners and Board of Directors manage human capital, including the process of employee placement in accordance with their skills, knowledge, and behavior; and
- c. The Board of Commissioners and Board of Directors raise awareness for all of the Bank's employees on the importance of effectiveness of their respective duties and responsibilities, and the employees communicate to the relevant management regarding every problem occurring in the Bank's operational activities.

All of the operational policies, standards, and procedures are documented in writing and are available for each related employees in order to support the efficient implementation of the control culture. The Bank also manages and avoids any policy and practice that may encourage or create opportunities of deviation or violation in order to strengthen ethical value.

## 2. Risk Identification and Assessment

In order to identify, analyze, and assess risks the Bank will face in achieving the established targets, the Board of Directors conducts risk assessment. In relation to this, Bank Victoria conducts continuous monitoring by identifying

mengidentifikasi semua jenis risiko yang dihadapi oleh Bank, baik risiko individual maupun secara keseluruhan, serta menetapkan limit dan teknik pengendalian risiko tersebut dengan dibantu oleh auditor internal sehingga cakupan audit dapat dilakukan lebih luas. Apabila terdapat risiko yang belum dikendalikan, Bank akan mengkaji ulang pengendalian internal secara tepat.

Adapun risiko yang dapat timbul atau berubah sesuai dengan kondisi Bank, antara lain terkait:

- a. Perubahan kegiatan operasional Bank;
- b. Perubahan susunan personalia;
- c. Perubahan sistem informasi;
- d. Pertumbuhan yang cepat pada kegiatan usaha tertentu;
- e. Perkembangan teknologi;
- f. Pengembangan jasa, produk, atau aktivitas baru;
- g. Terjadinya penggabungan usaha, peleburan usaha, pengambilalihan, dan restrukturisasi Bank;
- h. Perubahan dalam sistem akuntansi;
- i. Ekspansi usaha;
- j. Perubahan hukum dan peraturan; serta
- k. Perubahan perilaku dan ekspektasi nasabah.

### 3. Kegiatan Pengendalian Internal dan Pemisahan Fungsi

Kegiatan pengendalian internal yang melibatkan seluruh pihak internal akan berjalan efektif apabila direncanakan dan dilakukan pemantauan dalam penerapannya. Kegiatan pengendalian ini meliputi kebijakan, prosedur, dan praktik yang memberikan keyakinan kepada pejabat dan karyawan Bank bahwa arahan Dewan Komisaris dan Direksi Bank telah dilaksanakan secara efektif. Kegiatan tersebut telah diterapkan oleh Bank Victoria pada semua tingkatan fungsional sesuai dengan struktur organisasi Bank dan dijelaskan sebagai berikut.

#### a. Kaji Ulang Manajemen

Kegiatan pengendalian internal melalui Direksi, selaku *top level management*, dilakukan dengan mengadakan rapat secara berkala bersama Dewan Komisaris dan SKAI/*Integrated & Anti Fraud*. Rapat tersebut di antaranya membahas mengenai Laporan Hasil Pemeriksaan Audit yang dilakukan oleh auditor internal sehingga memungkinkan bagi Direksi untuk melakukan kaji ulang atas hasil pemeriksaan audit rutin maupun khusus.

#### b. Kaji Ulang Kinerja Operasional

Sebagai bentuk kaji ulang atas kinerja operasional Bank, maka SKAI/*Integrated & Anti Fraud* secara rutin mengadakan pertemuan/rapat dengan Komite-Komite di bawah Direksi, seperti ALCO, Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan, serta Komite Pemantau dan Pelaksanaan GCG, guna memastikan pengendalian internal telah berjalan pada level operasional Bank.

all types of risks faced by the Bank, both individual and aggregate risks, and establishing such risk limit and control technique assisted by the internal auditor for wider audit coverage. In the event of any risk that has not been controlled, the Bank will re-assess the internal control appropriately.

The risks that may arise or change in accordance with the conditions of the Bank, among others:

- a. Change of the Bank's operations;
- b. Change of personnel structure;
- c. Change of information system;
- d. Rapid growth in certain business activities;
- e. Technological development;
- f. Development of new services, products, or activities;
- g. Business merger, consolidation, acquisition, and restructuring of the Bank;
- h. Change in the accounting system;
- i. Business expansion;
- j. Amendment to laws and regulations; and
- k. Change in customer's behavior and expectation.

### 3. Activities of Internal Control and Separation of Functions

Internal control activities involving all internal parties will be effective if the implementation is planned and monitored. These control activities include policies, procedures, and practices that provide assurance to the Bank's officials and employees that direction from the Bank's Board of Commissioners and Board of Directors has been effectively implemented. These activities have been implemented by Bank Victoria at all functional levels in accordance with the Bank's organizational structure and described as follows.

#### a. Management Review

Internal control activities through the Board of Directors, as top-level management, are conducted by regular meeting with the Board of Commissioners and SKAI/*Integrated & Anti Fraud*. Such meetings include discussing the Audit Result Report conducted by the internal auditor to enable the Board of Directors to conduct a review of the results of routine and special audit checks.

#### b. Operational Performance Review

As a review of the Bank's operational performance, the SKAI/*Integrated & Anti-Fraud* regularly conducts meetings with the Committees under the Board of Directors, such as ALCO, Integrated Risk Management Committee in the Financial Group Committee, and GCG Implementation and Monitoring Committee, to ensure that internal control has been running at the Bank's operational level.



- c. **Pengendalian Sistem Informasi**  
Bank menerapkan pengendalian internal atas sistem informasi dan teknologi dengan melaksanakan verifikasi terhadap akurasi dan kelengkapan dari transaksi, serta melaksanakan prosedur otorisasi sesuai dengan ketentuan internal Bank. Hal tersebut dilakukan melalui kegiatan audit rutin pada Divisi *Information Technology* serta Divisi *Business Analytic and MIS*.
- d. **Pengendalian Aset Fisik**  
Pengendalian atas aset fisik dilaksanakan untuk menjamin terselenggaranya pengamanan fisik terhadap aset yang dimiliki oleh Bank. Terkait hal ini, Bank secara periodik mengadakan audit tahunan kepada Divisi *Human Capital Management & General Affair*.
- e. **Dokumentasi**  
Dokumentasi atas kegiatan pengendalian internal dilakukan melalui formalisasi dan pendokumentasian seluruh kebijakan, prosedur, sistem dan standar akuntansi, serta proses audit dengan memadai. Beberapa bentuk dokumentasi tersebut di antaranya penerbitan Surat Keputusan Direksi No. 003/SK-DIR/12/17 tanggal 13 Desember 2017 tentang SOP *Corporate Secretary*, serta Surat Edaran Direksi No. 004/SE-DIR/03/17 tanggal 21 Maret 2017 tentang Sistem *File Kredit*. Bank Victoria juga melakukan pembaruan secara berkala terhadap kebijakan maupun SOP yang berlaku saat ini, sehingga dapat mengakomodir dan menggambarkan kebutuhan Bank secara aktual. Pembaharuan terkait kebijakan maupun SOP selalu diinformasikan kepada pejabat dan seluruh karyawan Bank.
- c. **Information System Control**  
The Bank implements internal control over information and technology system by verifying transaction accuracy and completeness, and performing the authorization procedures in accordance with the Bank's internal regulations. This is done through routine audit activities in Information Technology Division as well as Business Analytic and MIS Division.
- d. **Control of Physical Assets**  
Physical asset control is performed to ensure physical security of the Bank's assets. In this regard, the Bank periodically conducts annual audit to Human Capital Management & General Affair Division.
- e. **Documentation**  
Documentation for internal control activities was conducted through formalizing and documenting all policies, procedures, systems, and accounting standards, as well as audit process adequately. Some of such document types are among others issuance of the Board of Directors' Decision Letter No. 003/SK-DIR/12/17 dated 13 December 2017 on Corporate Secretary's SOP, and Board of Directors' Circular No. 004/SE-DIR/03/17 dated 21 March 2017 on Credit Filing System. Bank Victoria also periodically renews its existing policies and SOP, in order to accommodate and to reflect the Bank's actual requirements. The renewal related to policies and all SOP is consistently informed to all of the Bank's officers and employees.

Dalam melaksanakan kegiatan pengendalian internal, Bank Victoria menerapkan prinsip pemisahan fungsi yang diharapkan dapat mencapai sistem pengendalian internal yang efektif, serta bertujuan agar setiap orang dalam jabatannya tidak memiliki peluang untuk melakukan kesalahan atau penyimpangan dalam pelaksanaan tugas di setiap level organisasi. Penerapan pemisahan fungsi tersebut salah satunya terwujud dalam Surat Keputusan Direksi No. 007/SK-DIR/01/18 tanggal 11 Januari 2018 tentang Pendelegasian Wewenang Biaya Unit Kerja *General Affairs*.

In implementing the internal control activities, Bank Victoria applies the principle of separation of functions that is expected to achieve an effective internal control system, and aims to make everyone in their respective position to not have the opportunity to make mistakes or deviations in executing their duties at every organizational level. Implementation of function separation is among others manifested in the Board of Directors' Decision Letter No. 007/SK-DIR/01/18 dated 11 January 2018 on Authorization Delegation of the General Affairs Work Unit's Cost

#### 4. Sistem Akuntansi, Informasi, dan Komunikasi

Sistem akuntansi, informasi, dan komunikasi yang optimal dilakukan agar Bank dapat mengidentifikasi masalah yang mungkin timbul, serta sebagai sarana tukar menukar informasi dalam melaksanakan tugas sesuai dengan tanggung jawab masing-masing. Sistem akuntansi Bank terdiri dari metode dan catatan dalam rangka mengidentifikasi, mengelompokkan, menganalisis, mengklasifikasi, mencatat/membukukan, dan melaporkan

#### 4. Accounting, Information, and Communication Systems

An optimal accounting, information, and communication system is established to enable the Bank to identify problems that may arise, as well as a means of exchanging information in carrying out its tasks according to its respective responsibilities. The Bank's accounting system consists of methods and records to identify, classify, analyze, classify, record, and report transactions with the Bank, in accordance with the applicable accounting

transaksi yang terjadi pada Bank, sesuai dengan standar akuntansi yang berlaku di Indonesia. Sistem informasi Bank dikelola secara tepat dan dimutakhirkan secara berkala agar dapat menghasilkan laporan yang akurat dan tepat waktu mengenai kegiatan usaha, kondisi keuangan, penerapan manajemen risiko, dan pemenuhan ketentuan yang mendukung pelaksanaan tugas Dewan Komisaris dan Direksi Bank. Pengelolaan sistem informasi termasuk pada pengorganisasian rencana pemulihan darurat (*contingency recovery plan*) dan sistem rekam cadang (*back up*) untuk mencegah kegagalan usaha yang berisiko tinggi. Sedangkan, sistem komunikasi dikelola agar mampu memberikan informasi secara tepat waktu kepada seluruh pihak, baik internal maupun eksternal, seperti Otoritas Jasa Keuangan, auditor eksternal, Pemegang Saham, dan nasabah Bank.

**5. Kegiatan Pemantauan dan Tindakan Koreksi Penyimpangan**

Pengendalian internal yang efektif memerlukan tindakan pemantauan dan koreksi penyimpangan terhadap efektivitas seluruh pelaksanaan pengendalian internal. Terkait hal ini, Bank melakukan pemantauan terhadap risiko utama yang diprioritaskan, termasuk evaluasi secara berkala, baik oleh masing-masing Unit Kerja Operasional sebagai *risk taking unit* maupun oleh SKAI/*Integrated & Anti Fraud*. Dalam upaya memantau dan melakukan tindakan koreksi penyimpangan, auditor internal telah melakukan kegiatan pemeriksaan operasional dan keuangan di kantor-kantor Bank, meliputi perkreditan, dana pihak ketiga (DPK), penerapan APU dan PPT, penerapan *know your customer* (KYC), *teller* dan uang tunai, *security*, *service excellence*, Laporan Keuangan, gedung dan inventaris, serta lain-lain. Terhadap setiap kelemahan dalam pengendalian internal, baik yang diidentifikasi oleh *risk taking unit*, auditor internal, ataupun pihak lainnya, akan segera dilaporkan kepada pejabat dan/atau Direksi yang berwenang untuk diperhatikan dan dilakukan tindakan koreksi.

**Evaluasi Efektivitas Sistem Pengendalian Internal 2021**

Melalui SKAI/*Integrated & Anti Fraud*, Bank senantiasa melakukan evaluasi efektivitas sistem pengendalian internal. Hasil evaluasi dikomunikasikan dengan Direksi dan dilaporkan kepada Dewan Komisaris melalui Komite Audit agar diperoleh usulan perbaikan guna mencapai peningkatan yang berkelanjutan dari proses lini bisnis yang ada.

Guna meningkatkan efektivitas sistem pengendalian internal, di tahun 2021, Bank telah melaksanakan langkah-langkah tindak lanjut atas laporan yang diterima terkait dengan kecukupan pengendalian internal untuk memitigasi risiko. Bank telah mematuhi kebijakan internal dan peraturan eksternal, serta mengidentifikasi risiko yang ada untuk dikelola secara tepat waktu dan proaktif.

standards in Indonesia. The Bank's information system is properly managed and updated periodically in order to produce accurate and timely reports on business activities, financial conditions, risk management implementation, and compliance with the provisions that support the implementation of the Bank's Board of Commissioners and Board of Directors duties. The management of information system includes organizing contingency recovery plans and back up systems to prevent high risk business failures. Whereas, the communication system is managed to provide timely information to all parties, both internal and external, such as the Financial Services Authority, external auditors, Shareholders, and Bank's customers.

**5. Monitoring Activities and Corrective Actions**

Effective internal control requires monitoring and corrective actions against the effectiveness of all internal control implementation. In this regard, the Bank monitors primary risks, including periodic evaluations, by either Operating Unit as risk taking unit or by Internal Audit/*Integrated & Anti Fraud*. To monitor and conduct corrective actions, the internal auditor has conducted operational and financial auditing activities in the Bank's offices, including credit, third party funds (DPK), APU and PPT implementation, know your customer (KYC) implementation, teller and cash, security, service excellence, Financial Statements, building and inventory, and others. Any weaknesses in internal control, whether identified by risk taking units, internal auditors, or other parties, must be immediately reported to the authorized officers and/or Directors for their observation and corrective actions.

**Evaluation on the Effectiveness of Internal Control System in 2021**

Through SKAI/*Integrated & Anti Fraud*, the Bank consistently evaluates the effectiveness of internal control system. The evaluation result is thereafter communicated to the Board of Directors and reported to the Board of Commissioners through Audit Committee in order to obtain corrective recommendations in order to achieve sustainable improvement from the process of existing business line.

In order to enhance the effectiveness of internal control system, in 2021, the Bank took follow-up measures on report received related to the adequacy of internal control of risk mitigating. The Bank has complied with internal policies and external regulations, and identified existing risks to be managed in a timely and proactive manner.



Dewan Komisaris dan Direksi Bank Victoria melakukan tinjauan ulang atas sistem pengendalian internal perusahaan secara berkelanjutan dan konsisten. Di tahun 2021, Dewan Komisaris dan Direksi menilai bahwa sistem pengendalian internal yang dimiliki telah mencukupi untuk menunjang keberlanjutan Bank Victoria.

Bank Victoria's Board of Commissioners and Board of Directors review the Company's internal control system continuously and consistently. In 2021, the Board of Commissioners and Board of Directors considered that the internal control system was adequate to support Bank Victoria's sustainability.

## Fungsi Kepatuhan Compliance Function

Kompleksitas kegiatan usaha Bank semakin meningkat sehingga eksposur risiko yang dihadapi Bank juga semakin besar. Berdasarkan hal tersebut, Bank memitigasi risiko-risiko yang timbul dengan melaksanakan dan meningkatkan peran dan fungsi kepatuhan sesuai dengan Peraturan Otoritas Jasa Keuangan No. 46/POJK.03/2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum.

The complexity of the Bank's business activities continues to grow. As such, the Bank's risk exposure is also increasingly higher. Based on that, the Bank mitigates the risks by implementing and improving the compliance role and function in accordance with Financial Services Authority Regulation No. 46/POJK.03/2017 on Implementation of Compliance Function of Commercial Banks.

### Penanggung Jawab Fungsi Kepatuhan

Bank secara khusus telah memiliki Direktur Kepatuhan dan Manajemen Risiko serta Divisi *Compliance/Integrated, AML & System Procedure* yang berfokus dan bertanggung jawab pada pelaksanaan fungsi kepatuhan di Bank. Pelaksanaan fungsi kepatuhan juga secara aktif diawasi oleh Dewan Komisaris. Berikut tugas dan tanggung jawab masing-masing pihak tersebut.

#### 1. Dewan Komisaris

- a. Mengevaluasi pelaksanaan fungsi kepatuhan Bank paling sedikit 2 (dua) kali dalam setahun; dan
- b. Berdasarkan hasil evaluasi pelaksanaan fungsi kepatuhan, Dewan Komisaris menyampaikan saran-saran dalam rangka peningkatan kualitas pelaksanaan fungsi kepatuhan kepada Direktur Utama dengan tembusan kepada Direktur Kepatuhan dan Manajemen Risiko.

#### 2. Direktur Kepatuhan dan Manajemen Risiko

- a. Merumuskan strategi guna mendorong terciptanya budaya kepatuhan Bank;
- b. Mengusulkan kebijakan kepatuhan atau prinsip-prinsip kepatuhan yang akan ditetapkan oleh Direksi;
- c. Menetapkan sistem dan prosedur kepatuhan yang digunakan untuk menyusun ketentuan dan pedoman internal Bank;
- d. Memastikan bahwa seluruh kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan, termasuk prinsip syariah bagi Entitas Anak, yakni Bank Victoria Syariah;

### Person in Charge of the Compliance Function

The Bank specifically hired a Director of Compliance and Risk Management and Compliance/Integrated, AML & System Procedure Division that focus on and are in charge of the implementation of the Bank's compliance function. The implementation of compliance function is also under active supervision of the Board of Commissioners. Duties and responsibilities of each party are described as follows.

#### 1. Board of Commissioners

- a. Evaluating the implementation of the Bank's compliance function at least 2 (two) times a year; and
- b. Based on the evaluation results of implementation of compliance function, the Board of Commissioners provides suggestions to improve the quality of compliance function to the President Director with a copy to the Director of Compliance and Risk Management.

#### 2. Director of Compliance and Risk Management

- a. Formulating strategies to encourage the creation of the Bank's compliance culture;
- b. Proposing compliance policies or compliance principles to be specified by the Board of Directors;
- c. Establishing compliance systems and procedures to develop the Bank's internal provisions and guidelines;
- d. Ensuring that all policies, provisions, systems, and procedures and business activities conducted by the Bank are in accordance with the provisions of the Financial Services Authority and the laws and regulations, including the sharia principles for the Subsidiary, which is Bank Victoria Syariah;

- e. Meminimalkan risiko kepatuhan Bank;
- f. Melakukan tindakan pencegahan agar kebijakan dan/atau keputusan yang diambil Direksi Bank tidak menyimpang dari ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan; serta
- g. Melakukan tugas lain yang terkait dengan fungsi kepatuhan.

Terkait dengan pelaksanaan tata kelola terintegrasi, maka Direktur Kepatuhan dan Manajemen Risiko yang telah ditunjuk sebagai Direktur *in Charge* dapat merumuskan langkah-langkah strategis dalam mendukung dan meningkatkan efektivitas penerapan fungsi kepatuhan, penerapan manajemen risiko, serta penerapan tata kelola terintegrasi pada konglomerasi keuangan Grup Victoria. Pelaporan pelaksanaan tugas dan tanggung jawab dari fungsi kepatuhan kepada regulator dilakukan oleh Direktur Kepatuhan dan Manajemen Risiko dengan tembusan kepada Dewan Komisaris paling kurang secara triwulan.

### 3. Divisi *Compliance/Integrated, AML & System Procedure*

- a. Membuat langkah untuk mendukung terciptanya budaya kepatuhan pada seluruh kegiatan usaha Bank pada setiap jenjang organisasi;
- b. Melakukan identifikasi, pengukuran, pemantauan, dan pengendalian terhadap risiko kepatuhan dengan mengacu pada ketentuan Otoritas Jasa Keuangan;
- c. Menilai dan mengevaluasi efektivitas, kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan peraturan perundang-undangan;
- d. Melakukan kaji ulang dan/atau merekomendasikan untuk mengkinikan dan menyempurnakan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan, termasuk prinsip syariah bagi Entitas Anak, yakni Bank Victoria Syariah;
- e. Melakukan upaya untuk memastikan bahwa kebijakan, ketentuan, sistem dan prosedur, serta kegiatan usaha Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan; serta
- f. Melakukan tugas lain yang terkait dengan fungsi kepatuhan.

Terkait dengan pelaksanaan tata kelola terintegrasi pada konglomerasi keuangan Grup Victoria, maka Divisi *Compliance/Integrated, AML & System Procedure* memiliki tugas dan tanggung jawab meliputi:

- a. Menetapkan langkah-langkah dalam rangka mendukung terciptanya budaya kepatuhan pada konglomerasi keuangan;

- e. Minimizing the Bank's compliance risk;
- f. Taking precautions so that the policies and/or decisions taken by the Bank's Board of Directors do not deviate from the provisions of the Financial Services Authority and the provisions of laws and regulations; and
- g. Performing other tasks associated with the compliance function.

Related to the implementation of integrated governance, the Director of Compliance and Risk Management who was appointed as the Director in Charge can formulate strategic steps to support and improve the effectiveness of compliance function implementation, risk management implementation, and the integrated governance implementation to Victoria Group Financial Conglomeration. Reporting of the implementation of duties and responsibilities of the compliance function to the regulator is conducted by the Director of Compliance and Risk Management with copies to the Board of Commissioners at least quarterly.

### 3. *Compliance/Integrated, AML & System Procedure* Division

- a. Preparing steps in order to support the creation of a compliance culture on all of the Bank's business activities at every organizational level;
- b. Identifying, measuring, monitoring, and controlling the compliance risks by referring to the provisions of the Financial Services Authority;
- c. Assessing and evaluating the effectiveness, adequacy, and conformity of the Bank's policies, regulations, systems, and procedures against the provisions of laws and regulations;
- d. Reviewing and/or recommending updates and refinements of policies, provisions, systems, and procedures owned by the Bank to be in accordance with the provisions of the Financial Services Authority and provisions of laws and regulations, including sharia principles for the Subsidiary, which is Bank Victoria Syariah;
- e. Taking measures to ensure that the policies, regulations, systems, and procedures, as well as the Bank's business activities to be in accordance with the provisions of the Financial Services Authority and provisions of laws and regulations; and
- f. Performing other tasks associated with the compliance function.

Related to the implementation of integrated governance in Victoria Group Financial Conglomeration, the *Compliance/Integrated, AML & System Procedure* Divisions have duties and responsibilities including:

- a. Specifying the measures to support the establishment of compliance culture in the financial conglomeration;

- b. Mendistribusikan dan mengomunikasikan setiap kebijakan terbaru terintegrasi dari Bank Indonesia dan Otoritas Jasa Keuangan, maupun kebijakan eksternal lainnya;
- c. Mengomunikasikan dan mengoordinasikan penyampaian data/informasi kepada pihak berwenang atau regulator; dan
- d. Mengomunikasikan dan mengoordinasikan proses pembuatan laporan kepada pihak berwenang atau regulator.

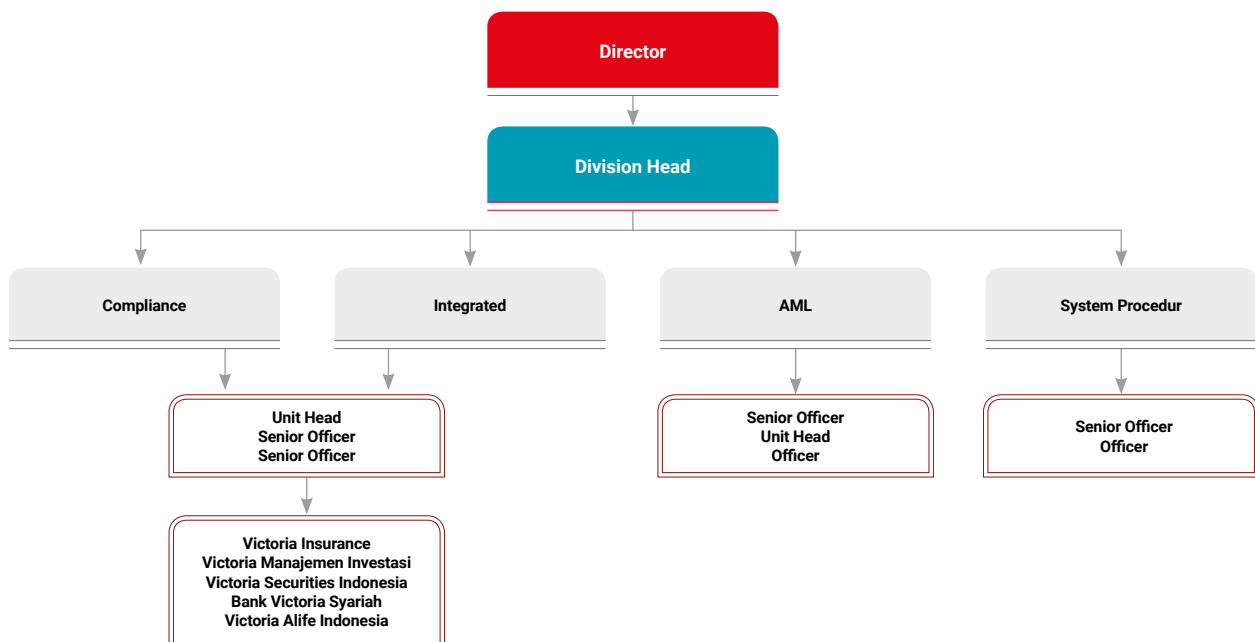
Divisi *Compliance/Integrated, AML & System Procedure* melaporkan seluruh aktivitasnya dalam melaksanakan tugas dan tanggung jawabnya langsung kepada Direktur Kepatuhan dan Manajemen Risiko, baik secara individu maupun secara terintegrasi.

- b. Distributing and communicating any integrated new policies from Bank Indonesia and Financial Services Authority, as well as other external policies;
- c. Communicating and coordinating the delivery of data/information to the authorities or regulators; and
- d. Communicating and coordinating the process of reporting to the authorities or regulators.

The Compliance, AML/Integrated & System Procedure Division reports all of its activities in performing its duties and responsibilities directly the Director of Compliance and Risk Management, both individually and in an integrated manner.

## Struktur Organisasi Fungsi Kepatuhan

## Organization Structure of the Compliance Function



## Tugas dan Tanggung Jawab Fungsi Kepatuhan

Bank secara khusus telah memiliki Direktur Kepatuhan dan Manajemen Risiko serta Divisi *Compliance/Integrated, AML & System Procedure* yang berfokus dan bertanggung jawab pada pelaksanaan fungsi kepatuhan di Bank. Pelaksanaan fungsi kepatuhan juga mendapatkan pengawasan aktif dari Dewan Komisaris. Berikut tugas dan tanggung jawab masing-masing pihak tersebut dalam menjalankan fungsi kepatuhan.

## Duties and Responsibilities of the Compliance Function

The Bank specifically hired a Director of Compliance and Risk Management as well as Compliance, AML/Integrated & System Procedure Division that focus on and are in charge of the implementation of the Bank's compliance function. The implementation of compliance function is also under active supervision of the Board of Commissioners. Duties and responsibilities of each party are described hereinbelow.

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p><b>Dewan Komisaris:</b> Board of Commissioners:</p> <p>Mengevaluasi pelaksanaan fungsi kepatuhan Bank paling sedikit 2 (dua) kali dalam setahun. Evaluate the implementation of the Bank's compliance function at least 2 (twice) a year.</p> <p>Berdasarkan hasil evaluasi pelaksanaan fungsi kepatuhan, Dewan Komisaris menyampaikan saran-saran dalam rangka peningkatan kualitas pelaksanaan fungsi kepatuhan kepada Direktur Utama dengan tembusan kepada Direktur Kepatuhan dan Manajemen Risiko. Based on evaluation results of the implementation of compliance function, the Board of Commissioners provides suggestions to improve the quality of compliance function to the President Director with a copy to the Director of Compliance and Risk Management.</p>	<p>1. Laporan Pelaksanaan Fungsi Kepatuhan Semester I 2021 telah disampaikan kepada Otoritas Jasa Keuangan melalui Surat Direksi No. 060/DIR-EKS/07/21 tanggal 28 Juli 2021; dan 2. Laporan Pelaksanaan Fungsi Kepatuhan Semester II 2021 telah disampaikan kepada Otoritas Jasa Keuangan melalui Surat Direksi No. 054/DIR-EKS/01/22 tanggal 26 Januari 2022.</p> <p>1. The Implementation Report of Compliance Function for Semester I 2021 was submitted to the Financial Services Authority through Board of Directors' Letter No. 060/DIR-EKS/07/21 dated 28 July 2021; and 2. The Implementation Report of Compliance Function for Semester II 2021 was submitted to the Financial Services Authority through the Board of Directors' Letter No. 054/DIR-EKS/01/22 dated 26 January 2022.</p> <p>Dewan Komisaris melakukan evaluasi dan menyampaikan saran berdasarkan Laporan Semester Kepatuhan. The Board of Commissioners evaluated and gave recommendations based on Compliance Semester Report.</p>
<p><b>Direktur Kepatuhan dan Manajemen Risiko:</b> Director of Compliance and Risk Management:</p> <p>Merumuskan strategi guna mendorong terciptanya budaya kepatuhan Bank. Formulating strategies to encourage the growth of the Bank's compliance culture.</p>	<p>Dalam rangka mewujudkan budaya kepatuhan, baik terhadap kebijakan maupun pelaksanaannya, telah dilakukan langkah-langkah yang meliputi:</p> <ol style="list-style-type: none"> <li>1. Memantau secara rutin dan berkesinambungan terhadap kebijakan baru yang telah dikeluarkan oleh Bank Indonesia dan Otoritas Jasa Keuangan serta instansi lainnya;</li> <li>2. Mendistribusikan setiap kebijakan baru dari Bank Indonesia dan Otoritas Jasa Keuangan maupun kebijakan eksternal lainnya;</li> <li>3. Mendaftarkan kebijakan baru ke situs web intranet Bank, yang dapat diakses oleh seluruh karyawan, sehingga karyawan memiliki <i>awareness</i> untuk mematuhi peraturan-peraturan tersebut;</li> <li>4. Membuat <i>resume</i> atau kajian terhadap kebijakan baru, yang selanjutnya disampaikan kepada seluruh Unit Kerja dan manajemen;</li> <li>5. Melakukan <i>sharing</i> informasi dan <i>knowledge</i> pada rapat bulanan yang dihadiri oleh Direksi, Kepala Divisi, dan kantor cabang;</li> <li>6. Melakukan pemantauan terhadap kewajiban pelaporan Bank, untuk memastikan bahwa laporan telah disampaikan tepat pada waktunya;</li> <li>7. Melakukan pemantauan terhadap Penerapan Program APU &amp; PPT, khususnya terkait dengan:             <ol style="list-style-type: none"> <li>a. Pelaporan <i>Suspicious Transaction Report</i> (STR);</li> <li>b. Pelaporan <i>Cash Transaction Report</i> (CTR) kepada PPAK dan lainnya;</li> <li>c. Pelatihan dan sumber daya manusia;</li> <li>d. Pelaksanaan <i>Assessment &amp; Focus Group Discussion</i> (FGD);</li> <li>e. Respon atas surat kepada regulator/instansi lainnya;</li> <li>f. Respon koresponden APU &amp; PPT Bank lain;</li> <li>g. Pemantauan penerapan APU PPT di Kantor Cabang;</li> <li>h. Pemantuan peserta <i>E-Learning</i> APU &amp; PPT;</li> </ol> </li> <li>8. Melakukan kajian terhadap setiap kebijakan dan prosedur internal yang akan dikeluarkan oleh Divisi; dan</li> <li>9. Untuk efektivitas penerapannya telah dibuat <i>e-mail</i> "Compliance_aml", sebagai media komunikasi dalam rangka meningkatkan hubungan antara Divisi Kepatuhan dengan Divisi lainnya di Kantor Pusat serta Kantor Cabang, baik terkait dengan kebijakan dan prosedur maupun penerapannya.</li> </ol> <p>To manifest the compliance culture, both in relation to the policy and its implementation, the following measures have been taken:</p> <ol style="list-style-type: none"> <li>1. Monitoring regularly and continuously all new policies issued by Bank Indonesia and Financial Services Authority, as well as other institutions;</li> <li>2. Circulating every new policy from Bank Indonesia and Financial Services Authority as well as other external policies;</li> <li>3. Registering the new policies to the Bank's intranet website accessible by all employees, so that employees will have awareness to comply with such regulations;</li> <li>4. Creating resume or review of new policies and thereafter submitting to all Work Units and the Management;</li> <li>5. Sharing information and knowledge during monthly meetings attended by the Board of Directors, Division Heads, and Branch Offices;</li> <li>6. Monitoring the Bank's reporting obligation to ensure that reports are submitted in a timely manner;</li> </ol>

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	<p>7. Monitoring the implementation of AML-CTF program, in particular with relation to:</p> <ol style="list-style-type: none"> <li>Suspicious Transaction Reporting (STR);</li> <li>Cash Transaction Reporting to PPATK and others;</li> <li>Training and human resources;</li> <li>Implementing Assessment &amp; Focus Group Discussions (FGD);</li> <li>Responding to letters from other regulators/agencies;</li> <li>Responding to AML &amp; CFT correspondences with other banks;</li> <li>Monitoring AML-CFT implementation in Branch Offices;</li> <li>Monitoring the participants of AML-CFT E-Learning</li> </ol> <p>8. Reviewing any internal policies and procedures to be issued by the Division; and</p> <p>9. For effective implementation, "compliance _aml" email has been created as a communication channel in order to improve the relationship between the Compliance Division with other Divisions at the Head Office and Branch Offices, both related to the policies and procedures and their application.</p>
<p>Mengusulkan kebijakan kepatuhan atau prinsip-prinsip kepatuhan yang akan ditetapkan oleh Direksi.</p> <p>Proposing compliance policies or compliance principles to be stipulated by the Board of Directors.</p>	<p>Direktur Kepatuhan dan Manajemen Risiko telah menyetujui Kebijakan Kepatuhan sesuai Surat Keputusan Direksi No. 007/SK-DIR/11/2019 tanggal 25 November 2019 tentang Kebijakan Kepatuhan.</p> <p>The Director of Compliance and Risk Management approved the Compliance Policy according to the Board of Directors' Decision Letter No. 007/SK-DIR/11/2019 dated 25 November 2019 on Compliance Policy.</p>
<p>Menetapkan sistem dan prosedur kepatuhan yang digunakan untuk menyusun ketentuan dan pedoman internal Bank.</p> <p>Establishing compliance systems and procedures to develop the Bank's internal regulations and guidelines.</p>	<p>Direktur Kepatuhan dan Manajemen Risiko telah menyusun pedoman Divisi <i>Compliance/Integrated, AML &amp; System Procedure</i>.</p> <p>The Director of Compliance and Risk Management compiled guidelines for the Compliance/Integrated, AML &amp; System Procedure Division.</p>
<p>Memastikan bahwa seluruh kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan, termasuk prinsip syariah bagi Entitas Anak, yakni Bank Victoria Syariah.</p> <p>Ensuring that all policies, provisions, systems, and procedures and business activities conducted by the Bank have been in accordance with the provisions of the Financial Services Authority and the laws and regulations, including sharia principles for the Subsidiary, which is Bank Victoria Syariah.</p>	<p>Direktur Kepatuhan dan Manajemen Risiko telah memastikan seluruh kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank sesuai dengan peraturan yang berlaku.</p> <p>The Director of Compliance and Risk Management ensured that all policies, provisions, systems, and procedures, as well as all business activities carried out by the Bank are in-line with the applicable regulations.</p>
<p>Meminimalkan risiko kepatuhan Bank.</p> <p>Minimizing the Bank's compliance risk.</p>	<p>Meminimalkan risiko kepatuhan Bank dengan melakukan evaluasi secara berkala pada saat rapat.</p> <p>Minimizing the Bank's compliance risks through evaluation performed periodically during meetings.</p>
<p>Melakukan tindakan pencegahan agar kebijakan dan/atau keputusan yang diambil Direksi Bank tidak menyimpang dari ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan.</p> <p>Taking precautions so that the policies and/or decisions taken by the Board of Directors do not deviate from the provisions of the Financial Services Authority and the provisions of laws and regulations.</p>	<p>Direktur Kepatuhan dan Manajemen Risiko telah melakukan pencegahan terhadap kebijakan dan/atau keputusan yang diambil Direksi Bank agar tidak menyimpang dari ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan melalui kajian dan arahan pada saat rapat.</p> <p>The Director of Compliance and Risk Management prevented policies and/or decisions that the Board of Directors of the Bank would like to implement in order not to deviate from the Financial Services Authority's regulations and prevailing laws and regulations through reviews and directions made during meetings.</p>
<p>Melakukan tugas lain yang terkait dengan fungsi kepatuhan.</p> <p>Performing other tasks associated with the compliance function.</p>	<p>Direktur Kepatuhan dan Manajemen Risiko telah melakukan tugas lainnya.</p> <p>Director of Compliance and Risk Management has performed other duties.</p>
<p>Merumuskan langkah-langkah strategis dalam mendukung dan meningkatkan efektivitas penerapan fungsi kepatuhan, penerapan manajemen risiko, serta penerapan tata kelola terintegrasi pada konglomerasi keuangan Grup Victoria.</p> <p>To formulate strategic measures in supporting and enhancing the effectiveness of compliance function application, risk management application, and integrated governance application in Victoria Group financial conglomeration.</p>	<p>Direktur Kepatuhan dan Manajemen Risiko telah merumuskan langkah-langkah strategis dalam mendukung dan meningkatkan efektivitas penerapan fungsi kepatuhan, penerapan manajemen risiko, serta penerapan tata kelola terintegrasi pada konglomerasi keuangan Grup Victoria.</p> <p>The Director of Compliance and Risk Management formulated strategic measures in supporting and enhancing the effectiveness of compliance function implementation, risk management implementation, and integrated governance implementation in Victoria Group's financial conglomeration.</p>

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p><b>Divisi Compliance/Integrated, AML &amp; System Procedure:</b> Compliance/Integrated, AML &amp; System Procedure Division:</p>	
<p>Membuat langkah untuk mendukung terciptanya budaya kepatuhan pada seluruh kegiatan usaha Bank pada setiap jenjang organisasi. Preparing steps in order to support the creation of a compliance culture on all of the Bank's business activities at every organizational level.</p>	<p>Mendaftarkan kebijakan baru ke situs web intranet Bank, yang dapat diakses oleh seluruh karyawan, sehingga karyawan memiliki kepedulian untuk mematuhi peraturan-peraturan tersebut. Registered new policies to the Bank's intranet website, accessible by all employees, in order for the employees to be aware and comply with the regulations.</p>
<p>Melakukan identifikasi, pengukuran, pemantauan, dan pengendalian terhadap risiko kepatuhan dengan mengacu pada ketentuan Otoritas Jasa Keuangan. Identifying, measuring, monitoring, and controlling the compliance risks by referring to the provisions of the Financial Services Authority.</p>	<p>Melakukan pengembangan materi <i>training</i> kepatuhan untuk meningkatkan kualitas karyawan Bank, meningkatkan budaya kepatuhan, serta memitigasi risiko kepatuhan. Developed compliance training materials to improve the quality of the Bank's employees, to improve the compliance culture, and to mitigate compliance risks.</p>
<p>Menilai dan mengevaluasi efektivitas, kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan peraturan perundang-undangan. Assessing and evaluating the effectiveness, adequacy, and conformity of the Bank's policies, regulations, systems, and procedures against the provisions of laws and regulations.</p>	<p>1. Mendistribusikan setiap kebijakan baru dari Bank Indonesia dan Otoritas Jasa Keuangan maupun kebijakan eksternal lainnya; 2. Membuat ringkasan atas peraturan baru dari Bank Indonesia dan Otoritas Jasa Keuangan agar lebih mudah dipahami oleh seluruh unit terkait; dan 3. Melakukan <i>Focus Grup Discussion</i> (FGD) atas peraturan regulator yang dirasa perlu. 1. Circulated new policies from Bank Indonesia and the Financial Services Authority and other external policies; 2. Prepared a summary of new regulations from Bank Indonesia and Financial Services Authority to facilitate easy comprehension for all relevant units. 3. Held Focus Group Discussion (FGD) on regulations from the regulators if deemed necessary.</p>
<p>Melakukan kaji ulang dan/atau merekomendasikan untuk memperbaiki dan menyempurnakan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan, termasuk prinsip syariah bagi Entitas Anak, yakni Bank Victoria Syariah. Reviewing and/or recommending updates and refinements of policies, provisions, systems, and procedures owned by the Bank to be in accordance with the provisions of the Financial Services Authority and provisions of laws and regulations, including sharia principles for the Subsidiary, which is Bank Victoria Syariah.</p>	<p>1. Memantau secara rutin dan berkesinambungan terhadap kebijakan baru yang telah dikeluarkan oleh Bank Indonesia atau Otoritas Jasa Keuangan, serta instansi lainnya; dan 2. Unit Kerja Sistem dan Prosedur bersama Unit Kerja terkait memperbaiki kebijakan dan SOP sesuai kebutuhan. 1. Regularly and continuously monitored all new policies issued by Bank Indonesia or Financial Services Authority and other institutions; and 2. The System and Procedure Work Unit together with related work units updated policies and SOP as needed.</p>
<p>Melakukan upaya untuk memastikan bahwa kebijakan, ketentuan, sistem dan prosedur, serta kegiatan usaha Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan. Taking measures to ensure that the policies, regulations, systems, and procedures, as well as the Bank's business activities are in accordance with the provisions of the Financial Services Authority and provisions of laws and regulations.</p>	<p>Melakukan kajian ulang terhadap kebijakan/aktivitas produk baru agar sesuai dengan peraturan yang berlaku dan selalu menyesuaikan dengan kebijakan terkini. Reviewed new product policies/activities in order to comply with the prevailing regulations and consistently adjusted them to the most updated policies.</p>
<p>Melakukan tugas lain yang terkait dengan fungsi kepatuhan. Performing other tasks associated with the compliance function.</p>	<p>Divisi <i>Compliance/Integrated, AML &amp; System Procedure</i> melakukan tugas lain, di antaranya: 1. Melakukan kajian atau meninjau kredit dan <i>treasury</i> terhadap <i>plafond</i> tertentu; 2. Mengawasi BMPK pihak terkait; dan 3. Mengawasi tindak lanjut temuan Otoritas Jasa Keuangan. <i>Compliance/Integrated, AML &amp; System Procedure</i> Division performed other duties, among others: 1. Assessed and reviewed credit and treasury for certain credit ceiling; 2. Monitored LLL of related parties; and 3. Monitored follow-up on Financial Services Authority findings.</p>
<p>Menetapkan langkah-langkah dalam rangka mendukung terciptanya budaya kepatuhan pada konglomerasi keuangan. Specifying the measures to support the creation of compliance culture within the financial conglomeration.</p>	<p>Membuat dan menyampaikan Laporan Terintegrasi sesuai ketentuan berlaku dan tepat waktu, yaitu Laporan Tahunan Tata Kelola Terintegrasi 2020 telah disampaikan kepada Otoritas Jasa Keuangan melalui Surat Direksi No.074/DIR-EKS/05/21 tanggal 27 Mei 2021. Preparing and submitting an Integrated Report in accordance with the applicable regulations and in a timely manner, which was the 2020 Integrated Governance Annual Report and was submitted to the Financial Services Authority through the Board of Directors' Letter No. No.074/DIR-EKS/05/21 dated 27 May 2021.</p>



Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Mendistribusikan dan mengomunikasikan setiap kebijakan terbaru terintegrasi dari Bank Indonesia dan Otoritas Jasa Keuangan, maupun kebijakan eksternal lainnya.</p> <p>Distributing and communicating the latest integrated policies of Bank Indonesia and the Financial Services Authority, as well as other external policies.</p>	<p>Mendistribusikan dan mengomunikasikan setiap kebijakan terbaru melalui:</p> <ol style="list-style-type: none"> <li>1. Rapat;</li> <li>2. <i>E-mail</i>; dan</li> <li>3. FGD (jika diperlukan).</li> </ol> <p>Circulated and communicated every new policy through:</p> <ol style="list-style-type: none"> <li>1. Meetings;</li> <li>2. E-mails; and</li> <li>3. FGD (if necessary).</li> </ol>
<p>Mengomunikasikan dan mengoordinasi penyampaian data/informasi kepada pihak berwenang atau regulator.</p> <p>Communicating and coordinating the delivery of data/information to the authorities or regulators.</p>	<p>Melaporkan kepada Bank Indonesia atau Otoritas Jasa Keuangan ataupun pihak lainnya terkait data/informasi Bank sesuai kebijakan dan perundang-undangan yang berlaku.</p> <p>Reported to Bank Indonesia of Financial Services Authority or other parties related to the Bank's data/information in accordance with the prevailing laws and regulations.</p>
<p>Mengomunikasikan dan mengoordinasikan pembuatan laporan kepada pihak berwenang atau regulator.</p> <p>Communicating and coordinating the process of reporting to the authorities or regulators.</p>	<p>Melakukan pemantauan atas tindak lanjut hasil pemeriksaan Otoritas Jasa Keuangan serta melaporkannya secara periodik atas progres dan penyelesaian yang telah dilakukan.</p> <p>Monitored the follow-up on Financial Services Authority audit result and periodically reported the progress and the settlement.</p>

## Program Kerja Fungsi Kepatuhan

Pada tahun 2021, Divisi *Compliance/Integrated, AML & System Procedure* telah menyusun program kerja fungsi kepatuhan dan telah disampaikan kepada Direktur Kepatuhan dan Manajemen Risiko. Program kerja yang disusun tersebut untuk mencapai tujuan sebagai berikut.

1. Terwujudnya pelaksanaan budaya kepatuhan pada semua tingkatan organisasi dan kegiatan usaha Bank;
2. Pengelolaan risiko kepatuhan yang dihadapi oleh Bank;
3. Terlaksananya kebijakan, ketentuan, sistem, prosedur, serta kegiatan usaha yang dilakukan oleh Bank sesuai dengan ketentuan Bank Indonesia dan/atau Otoritas Jasa Keuangan serta peraturan perundang-undangan yang berlaku; serta
4. Terwujudnya kepatuhan Bank terhadap komitmen yang dibuat oleh Bank kepada Bank Indonesia dan/atau Otoritas Jasa Keuangan, serta pengawas lain yang berwenang.

## Work Program of the Compliance Function

In 2021, the Compliance/Integrated, AML & System Procedure Division prepared compliance function work program and submitted to the Director of Compliance and Risk Management. The Work program was prepared in order to achieve the following goals.

1. Achieving the implementation of compliance culture at all organizational levels and business activities in the Bank;
2. Managing the compliance risk faced by the bank;
3. Ensuring that the policies, regulations, systems, and procedures, as well as business activities carried out by the Bank are in accordance with Bank Indonesia and/or Financial Services Authority's provisions and complies with the prevailing laws and regulations; and
4. Ensuring the Bank's compliance with the commitment made by the Bank to Bank Indonesia and/or Financial Services Authority, and other authoritative supervisory bodies.

## Pengadaan Barang dan Jasa Procurement of Goods and Services

Seiring dengan perkembangan usaha Bank, diperlukan sarana dan prasarana penunjang usaha yang memadai sehingga Bank dapat dengan leluasa menjalankan seluruh kegiatan operasionalnya. Selain itu, agar Bank dapat lebih fokus dalam menjalankan fungsi dan kegiatan usahanya, Bank dapat mengalihdayakan sebagian pelaksanaan pekerjaan penunjang kegiatan usaha kepada pihak lain yang merupakan perusahaan penyedia jasa.

In line with the Bank's business development, it is necessary to provide adequate supporting facilities and infrastructures so that the Bank can freely carry out its operational activities. Furthermore, the Bank will have a better focus in performing its business function and activities, the Bank is able to outsource part of its supporting business activities work implementation to other parties who are in the business of providing such



Terkait hal tersebut, Bank melaksanakan pengadaan barang dan jasa dengan menerapkan prinsip kehati-hatian dan kepatuhan terhadap peraturan dan perundang-undangan yang berlaku.

### Prinsip Dasar Pengadaan Barang dan Jasa

Dalam melaksanakan pengadaan barang dan jasa di lingkungan Bank Victoria, Divisi *Human Capital Management and General Affair* berpedoman pada Surat Keputusan Direksi No. 024/SKDIR/04/13 tentang Kebijakan dan Prosedur *General Affair* PT Bank Victoria International Tbk. Kebijakan tersebut mengatur beberapa prinsip dasar yang harus dipenuhi dalam kegiatan pengadaan barang dan jasa, yaitu:

1. Melakukan proses verifikasi kebutuhan dan jika benar harus dilakukan, maka akan diproses oleh Divisi *Human Capital Management and General Affair*;
2. Setiap *user* yang mengajukan rencana pengadaan, harus berusaha mencari penawaran terbaik; serta
3. Beberapa pengadaan barang dan/atau jasa diteliti berdasarkan sisi teknis, bukan berdasarkan harga.

### Etika Pengadaan Barang dan Jasa

Penetapan etika dalam aktivitas pengadaan barang dan/atau jasa di lingkungan Bank Victoria mengacu pada Surat Keputusan Direksi No. 001/SK-DIR/01/21 tanggal 11 Januari 2021 tentang Pedoman Kode Etik Perilaku Karyawan PT Bank Victoria International Tbk. Pedoman tersebut telah mengatur mengenai hubungan karyawan dengan rekanan atau calon rekanan bahwa kegiatan pengadaan barang dan/atau jasa haruslah memenuhi beberapa poin, yaitu:

service. In relation to that, the Bank carries out procurement of goods and services by applying the principle of prudence and in compliance with prevailing laws and regulations.

### Basic Principles of Procurement of Goods and Services

Human Capital Management and General Affairs Division refers to the Board of Directors' Decision Letter No. 024/SKDIR/04/13 on General Affairs Policies and Procedures of PT Bank Victoria International Tbk. The policy regulates some mandatory basic principles in procuring goods and services, which are:

1. Conducting verification process of needs and if absolutely necessary, it will be processed by the Human Capital Management and General Affairs Division.
2. Any user submitting procurement plan must try to find the best offer; and
3. Some procurements of goods and/or services are examined based on its technical side, not by price.

### Ethics of Procurement of Goods and Services

The establishment of ethics in activities related to procurement of goods and/or services within Bank Victoria refers to the Board of Directors' Decision Letter No. 001/SK-DIR/01/21 dated 11 January 2021 on Employee's Code of Conduct of PT Bank Victoria International Tbk. The conduct regulates employee's relationship with partner or prospective partner that the procurement of goods and/or services must meet several points such as:

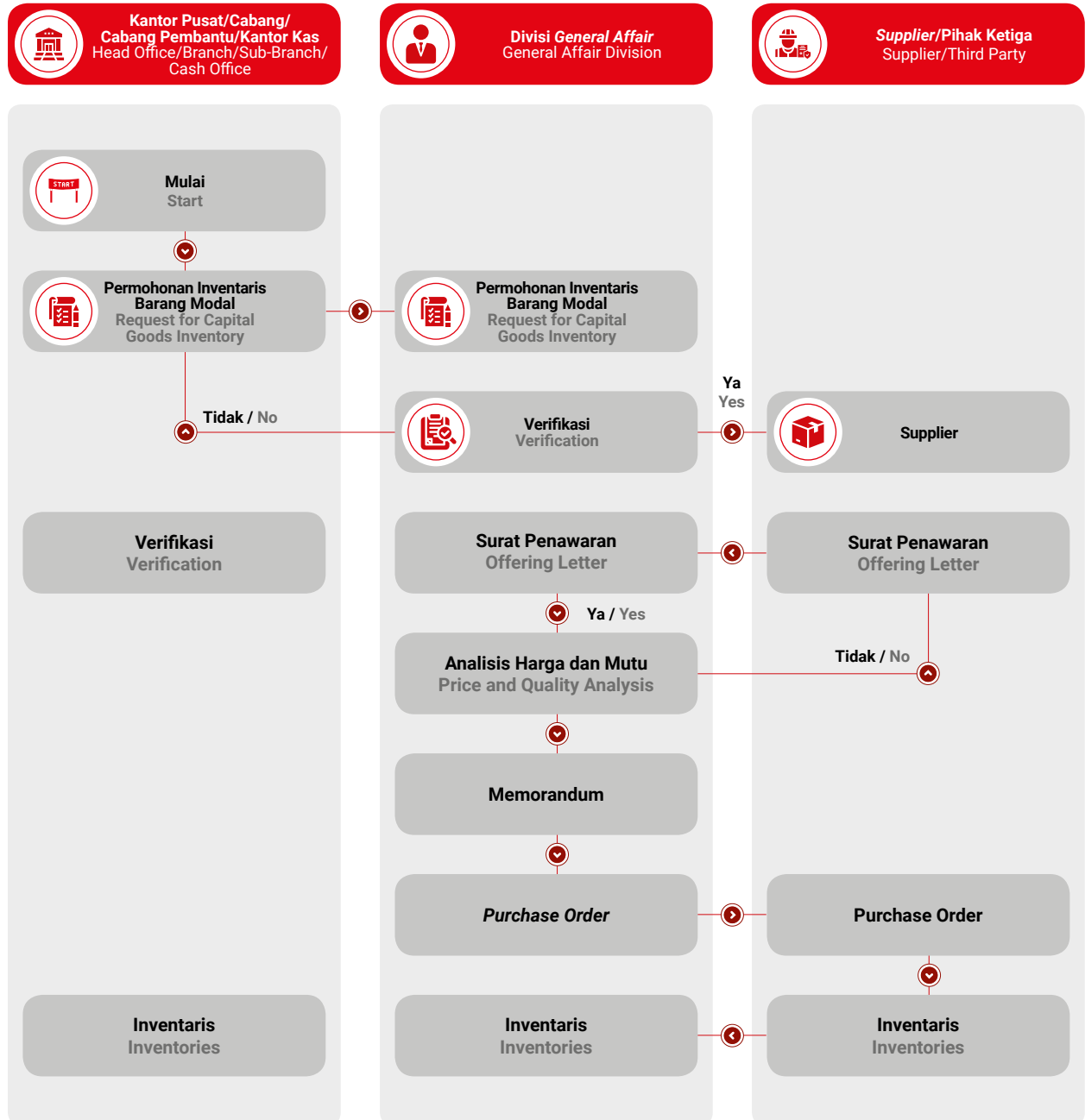


## Prosedur Pengadaan Barang dan Jasa

## Procedures of Procurement of Goods and Services

Berikut alur prosedur pengadaan barang dan/atau jasa yang berlaku di Bank Victoria.

The following are the procedures of procurement of goods and/or services applicable at Bank Victoria.



## Proses, Wewenang, dan Tanggung Jawab Pengadaan Barang dan Jasa

## Process, Authority, and Responsibility of Procurement of Goods and Services



### Pengadaan Barang dan Jasa Tahun 2021

Pada tahun 2021, realisasi biaya pengadaan barang dan jasa Bank sebesar Rp34.716.752.160,- dengan kegiatan pengadaan barang dan jasa sebanyak 11 (sebelas) kegiatan.

### Procurement of Goods and Services in 2021

In 2021, the realization of the Bank's cost of procurement of goods and services reached Rp34,716,752,160, with total of 11 (eleven) procurements of goods and services.

## Permasalahan Hukum Legal Cases

Pada tahun 2021, Bank dan Entitas Anak menghadapi permasalahan hukum yang terdiri dari kasus perdata dan pidana. Dalam kasus perdata Bank sebagai Penggugat/Tergugat/turut Tergugat dan dalam kasus pidana Bank sebagai saksi. Permasalahan hukum yang dihadapi Bank, Entitas Anak, Dewan Komisaris Bank dan Entitas Anak, serta Direksi Bank dan Entitas Anak ditunjukkan sebagai berikut.

In 2021, the Bank and Subsidiary faced legal cases consisting of civil and criminal cases. In civil case, the Bank was a Plaintiff/Defendant/Co-defendant, and in criminal cases, the Bank was a witness. The following is the description on legal issues encountered by the Bank, Subsidiary, Board of Commissioners of the Bank and Subsidiary, and Board of Directors of the Bank and Subsidiary.

Permasalahan Hukum Legal Cases	2021			2020		
	Perdata Civil	Pidana Criminal	Hubungan Industrial Industrial Relations	Perdata Civil	Pidana Criminal	Hubungan Industrial Industrial Relations
<b>Bank Victoria</b>	<b>14</b>	<b>-</b>	<b>1</b>	<b>9</b>	<b>1</b>	<b>-</b>
Telah Selesai (Mempunyai Kekuatan Hukum yang Tetap) Settled (Final and Binding)	4	-	1	6	-	-
Dalam Proses Penyelesaian In Settlement Process	10	-	-	3	1	-
Dewan Komisaris dan Direksi Bank Victoria Board of Commissioners and Board of Directors of Bank Victoria	-	-	-	-	-	-
<b>Telah Selesai (Mempunyai Kekuatan Hukum yang Tetap) Settled (Final and Binding)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Dalam Proses Penyelesaian In Settlement Process	-	-	-	-	-	-
<b>Bank Victoria Syariah</b>	<b>3</b>	<b>2</b>	<b>-</b>	<b>5</b>	<b>-</b>	<b>-</b>
Telah Selesai (Mempunyai Kekuatan Hukum yang Tetap) Settled (Final and Binding)	-	-	-	1	-	-
Dalam Proses Penyelesaian In Settlement Process	3	2	-	4	-	-
<b>Dewan Komisaris dan Direksi Bank Victoria Syariah Board of Commissioners and Board of Directors of Bank Victoria Syariah</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Telah Selesai (Mempunyai Kekuatan Hukum yang Tetap) Settled (Final and Binding)	-	-	-	-	-	-
Dalam Proses Penyelesaian In Settlement Process	-	-	-	-	-	-
<b>Total</b>	<b>17</b>	<b>2</b>	<b>1</b>	<b>14</b>	<b>-</b>	<b>-</b>

## Perkara Penting yang Dihadapi Bank Victoria Tahun 2021

## Cases Faced by Bank Victoria on 2021

### Perkara / Case 2317/Pdt.G/2019/PA.JS

Para Pihak Parties	Penggugat Plaintiff : Galina Hardyanti Tergugat Defendant : 1. Irfan Chandra 2. Gema Argita Turut tergugat Co-Defendant : 1. Kharisma Muhammad 2. Ampuh Risbati 3. Audry Faradisha 4. PT Pundi-Pundi Lumbang Pertiwi 5. PT Bank Victoria International Tbk 6. PT Swadharma Nusantara Pembiayaan
Pokok Perkara Case Profile	Sengketa waris Almarhum Bambang Heryanto (debitur). Inheritance dispute of the late Bambang Heryanto (debtor).
Nilai Nominal Nominal Value	Rp18,848,927,767.90
Status Penyelesaian Perkara Case Settlement Status	Putusan Pertama berkekuatan hukum tetap. Mengabulkan gugatan Penggugat sebagian. The First Ruling has permanent legal force. Accepted the Plaintiff's claim partially.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Tidak ada. None.
Sanksi Administrasi Administrative Sanctions	Tidak ada. None.

### Perkara / Case 407/Pdt.G/2021/PN.Jkt.Pst

Para Pihak Parties	Penggugat Plaintiff : Tjen Tat Tjong Tergugat Defendant : 1. PT Bank Victoria International Tbk 2. PT Duta Balai Lelang 3. Kantor Wilayah Direktorat Jenderal Kekayaan Negara DKI Jakarta Cq. KPKNL Jakarta III Regional Office of the Directorate General of State Assets of DKI Jakarta Cq. KPKNL Jakarta III Turut tergugat Co-Defendant : Tjung Fie Tjoen (Tjoeng)
Pokok Perkara Case Profile	Perbuatan melawan hukum. Tort.
Nilai Nominal Nominal Value	Rp495,000,000
Status Penyelesaian Perkara Case Settlement Status	Putusan berkekuatan hukum tetap. Menolak tuntutan provisi Penggugat untuk seluruhnya. The Ruling has permanent legal force. Reject the Plaintiff's provisional claim in its entirety.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Tidak ada. None.
Sanksi Administrasi Administrative Sanctions	Tidak ada. None.

### Perkara / Case 645/Pdt.G/2021/PN.Jkt.Pst

Para Pihak Parties	Penggugat Plaintiff : 1. Edric Novidiyanto 2. Fenny Tergugat Defendant : PT Bank Victoria International Tbk Turut tergugat Co-Defendant : 1. Tim Kurator PT Danau Wisata Indah (dalam pailit) 2. Notaris/Pejabat Pembuat Akta Tanah Budiman Cornelius Santiago Hutapea 3. Notaris/Pejabat Pembuat Akta Tanah Suwarni Sukiman 4. PT Bank Victoria International Tbk, Kantor Kas Grand Boutique 1. Curator Team of PT Danau Wisata Indah (in bankruptcy) 2. Notary/Land Deed Official Budiman Cornelius Santiago Hutapea 3. Notary/Land Deed Official Suwarni Sukiman 4. PT Bank Victoria International Tbk, Grand Boutique Cash Office
Pokok Perkara Case Profile	Perbuatan melawan hukum. Tort.
Nilai Nominal Nominal Value	1. Penggugat 1 : Rp223.352.214,83,- 2. Penggugat 2 : Rp160.804.773,52,- 1. Plaintiff 1 : Rp223,352,214.83 2. Plaintiff 2 : Rp160,804,773.52

Status Penyelesaian Perkara Case Settlement Status	Dalam proses di Pengadilan Negeri. On trial process at the District Court.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.

**Perkara / Case****44K/TUN/2021 jo. 195/B/2020/PT.TUN.JKT jo. 1/G/2020/PTUN.SRG**

Para Pihak Parties	Penggugat Plaintiff Tergugat Defendant	: PT Froggy Edutography (pemohon kasasi / cassation petitioner) : 1. Kepala Kantor Pelayanan Kekayaan Negara dan Lelang Tangerang II Head of State Assets and Auction Service Office of Tangerang II 2. PT Surya Sentra Gemilang Sentosa 3. PT Bank Victoria International Tbk
Pokok Perkara Case Profile	Gugatan atas risalah lelang jaminan penggugat yang dikeluarkan oleh Kepala Kantor Pelayanan Kekayaan Negara dan Lelang Tangerang II Lawsuit over the minutes of auction of the plaintiff's guarantee issued by the Head of State Assets and Auction Service Office of Tangerang II	
Nilai Nominal Nominal Value	Rp51.451.000.000,- (harga lelang yang dibeli PT Surya Sentra Gemilang Sentosa). Rp51,451,000,000 (auction price purchased by PT Surya Sentra Gemilang Sentosa).	
Status Penyelesaian Perkara Case Settlement Status	Putusan kasasi berkekuatan hukum tetap. Menolak permohonan Kasasi. Cassation ruling has permanent legal force. Reject the Cassation application.	
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Tidak ada. None.	
Sanksi Administrasi Administrative Sanctions	Tidak ada. None.	

**Perkara / Case****332/PDT/2021/PT.DKI jo. 548/Pdt.G/2019/PN.Jkt.Pst**

Para Pihak Parties	Penggugat Plaintiff Tergugat Defendant	: PT Bank Victoria International Tbk : 1. PT Lintas Cipta Development (pemohon banding) 2. Richie Wirjan (pemohon banding) 1. PT Lintas Cipta Development (appellant) 2. Richie Wirjan (appellant)
Pokok Perkara Case Profile	Wanprestasi. Default.	
Nilai Nominal Nominal Value	Pokok Denda Principal Fines	: Rp4.440.213.003,04,- (tanggung renteng) : Rp357.219.514,38,- (tanggung renteng) : Rp4,440,213,003.04 (jointly and severally) : Rp357,219,514.38 (jointly and severally)
Status Penyelesaian Perkara Case Settlement Status	Dalam proses di Pengadilan Tinggi. On trial process at the Appellate Court.	
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.	
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.	

**Perkara / Case****153/Pdt.G/2020/PN.Jkt.Sel**

Para Pihak Parties	Penggugat Plaintiff Tergugat Defendant Turut tergugat Co-Defendant	: 1. Goey Swan King 2. Emmanuel Johannes Ismail Chamdani 3. Joseph Stepanus Irawan Chamdani 4. Edward Ismawan Chamdani 5. Noline Indrajani 6. Emilia Maria Chamdani 7. Michael Ivan Chamdani : 1. PT Papan Utama Indonesia 2. PT Bank Victoria International Tbk : 1. Notaris/Pejabat Pembuat Akta Tanah Merry Susanti Siaril 2. Pejabat Pembuat Akta Tanah Vivi Novita Ranadireksa 3. Kepala Kantor Pertanahan Kota Administrasi Jakarta Selatan 4. Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia Cq. Direktorat Jenderal Administrasi Hukum Umum 1. Notary/Land Deed Official Merry Susanti Siaril 2. Land Deed Official Vivi Novita Ranadireksa 3. Head of Land Office of South Jakarta Administrative City 4. Ministry of Law and Human Rights of the Republic of Indonesia Cq. Directorate General of General Legal Administration
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Pokok Perkara Case Profile	Perbuatan melawan hukum. Tort.
Nilai Nominal Nominal Value	Rp34.725.810.000,- (ditanggung tergugat 1). Rp34,725,810,000 (borne by defendant 1).
Status Penyelesaian Perkara Case Settlement Status	Putusan pertama berkekuatan hukum tetap. Gugatan tidak dapat diterima. The First Ruling has permanent legal force. Lawsuit was not accepted.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Tidak ada. None.
Sanksi Administrasi Administrative Sanctions	Tidak ada. None.

**Perkara / Case  
220/Pdt.G/2020/PN.Jkt.Sel**

Para Pihak Parties	Penggugat : PT Sari Semesta Utama Plaintiff Tergugat : PT Bank Victoria International Tbk Defendant Turut tergugat : 1. Kantor Pelayanan Kekayaan Negara dan Lelang Tangerang II Co-Defendant 2. Kantor Pelayanan Kekayaan Negara dan Lelang Bandar Lampung 3. Badan Pertanahan Nasional Tangerang Selatan 4. Badan Pertanahan Nasional Bandar Lampung 1. State Assets and Auction Service Office of Tangerang II 2. State Assets and Auction Service Office of Bandar Lampung 3. South Tangerang National Land Agency 4. Bandar Lampung National Land Agency
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Pokok Perkara Case Profile	Perbuatan melawan hukum. Tort.
Nilai Nominal Nominal Value	Utang debitur / Debtors Payable: 1. DL : Rp28,000,000,000 2. Pinjaman rekening koran : Rp5,000,000,000 Overdraft loans 3. KI : Rp5,636,788,209 4. KI : Rp4,626,506,024
Status Penyelesaian Perkara Case Settlement Status	Putusan pertama berkekuatan hukum tetap. Gugatan tidak dapat diterima. The First Ruling has permanent legal force. Lawsuit was not accepted.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Tidak ada. None.
Sanksi Administrasi Administrative Sanctions	Tidak ada. None.

**Perkara / Case  
207/Pdt.G/2020/PN.Jkt.Pst**

Para Pihak Parties	Penggugat : Hadiyanto Plaintiff Tergugat : 1. PT Bank Victoria International Tbk Defendant 2. Kantor Pelayanan Kekayaan Negara dan Lelang Jakarta III State Assets and Auction Service Office of Jakarta III
Pokok Perkara Case Profile	Perbuatan melawan hukum. Tort.
Nilai Nominal Nominal Value	Pokok : Rp17,000,000,000,- Principal Biaya perkara : Rp200,000,000,- Court fee
Status Penyelesaian Perkara Case Settlement Status	Putusan pertama berkekuatan hukum tetap. Gugatan tidak dapat diterima. The First Ruling has permanent legal force. Lawsuit was not accepted.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Tidak ada. None.
Sanksi Administrasi Administrative Sanctions	Tidak ada. None.



**Perkara / Case**  
**512/Pdt.G/2020/PN.Jkt.Pst**

Para Pihak Parties	Penggugat Plaintiff	: 1. Yayasan Pendidikan Kader Keuangan dan Perbankan Bandung Bandung Finance and Banking Cadre Education Foundation 2. Rinalwan Buchari 3. Riska Nurasiyah
	Tergugat Defendant	: PT Bank Victoria International Tbk
	Turut Tergugat Co-Defendant	: 1. Notaris/Pejabat Pembuat Akta Tanah Daniel Parganda Marpaung 2. Kantor Agraria dan Pertanahan Kota Bandung 3. Kantor Agraria dan Pertanahan Kabupaten Bogor 1. Notary/Land Deed Official Daniel Parganda Marpaung 2. Bandung City Agrarian and Land Office 3. Bogor Regency Agrarian and Land Office
Pokok Perkara Case Profile	Perbuatan melawan hukum. Tort.	
Nilai Nominal Nominal Value	Utang Payable	: Rp9.936.441.070,61,- (per 19 Januari 2021). : Rp9,936,441,070.61 (per 19 January 2021).
Status Penyelesaian Perkara Case Settlement Status	Putusan pertama berkekuatan hukum tetap. Gugatan para penggugat gugur. The First Ruling has permanent legal force. The plaintiffs' lawsuit was dismissed.	
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Tidak ada. None.	
Sanksi Administrasi Administrative Sanctions	Tidak ada. None.	

**Perkara / Case**  
**948/Pdt.G/2021/PN.Jkt.Sel**

Para Pihak Parties	Penggugat Plaintiff	: 1. PT Virgo Sari 2. Dewi Eka Arini
	Tergugat Defendant	: 1. PT Bank Victoria International Tbk 2. Anis Adwani 3. Pemerintah Republik Indonesia Cq. Kementerian Keuangan Republik Indonesia Cq. Kantor Pelayanan Kekayaan Negara dan Lelang Bogor The Government of the Republic of Indonesia Cq. Ministry of Finance of the Republic of Indonesia Cq. State Assets and Auction Service Office of Bogor 4. Notaris/Pejabat Pembuat Akta Tanah Suwarni Sukiman Notary/Land Deed Official Suwarni Sukiman 5. Pemerintah Republik Indonesia Cq. Kementerian Agraria dan Tata Ruang/Badan Pertanahan Nasional Republik Indonesia Cq. Kantor Badan Pertanahan Nasional Kabupaten Bogor The Government of the Republic of Indonesia Cq. Ministry of Agrarian and Spatial Planning/National Land Agency of the Republic of Indonesia Cq. Bogor Regency National Land Agency Office 6. Fildzah
Pokok Perkara Case Profile	Perbuatan melawan hukum. Tort.	
Nilai Nominal Nominal Value	Rp5,000,000,000	
Status Penyelesaian Perkara Case Settlement Status	Dalam proses di Pengadilan Negeri. On trial process at the District Court.	
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.	
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.	

**Perkara / Case**  
**1060/Pdt.G/2021/PN.Tng**

Para Pihak Parties	Penggugat Plaintiff	: Agen Saputera
	Tergugat Defendant	: PT Bank Victoria International Tbk
	Turut Tergugat Co-Defendant	: 1. Badan Pertanahan Nasional Cq. Kantor Wilayah Badan Pertanahan Nasional Banten Cq. Kantor Pertanahan Kabupaten Tangerang 2. Kementerian Keuangan Republik Indonesia Cq. Direktur Jenderal Kekayaan Negara Banten Cq. Kantor Pelayanan Kekayaan Negara dan Lelang Tangerang II 1. National Land Agency Cq. Banten National Land Agency Regional Office Cq. Tangerang Regency Land Office 2. Ministry of Finance of the Republic of Indonesia Cq. Director General of Banten State Assets Cq. State Assets and Auction Service Office of Tangerang II

Pokok Perkara Case Profile	Perbuatan melawan hukum. Tort.
Nilai Nominal Nominal Value	Rp2,000,000,000
Status Penyelesaian Perkara Case Settlement Status	Dalam proses di Pengadilan Negeri. On trial process at the District Court.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.

**Perkara / Case  
604/Pdt.G/2021/PN.Jkt.Sel**

Para Pihak Parties	Penggugat Plaintiff : PT Iswara Dewata Tergugat Defendant : PT Bank Victoria International Tbk
Pokok Perkara Case Profile	Wanprestasi. Default.
Nilai Nominal Nominal Value	Rp219,483,844,757 (USD11,600,000)
Status Penyelesaian Perkara Case Settlement Status	Dalam proses di Pengadilan Negeri. On trial process at the District Court.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.

**Perkara / Case  
659/Pdt.G/2021/PN.Jkt.Pst**

Para Pihak Parties	Penggugat Plaintiff : 1. Agus Gondokusumo Limantoro 2. Agus Suroto 3. Agustiwan Soedibyo 4. Arvina Syawir 5. Carolina Lilyany Djomi 6. Christopher Fernand Budiarto 7. David Sari Tua Hasibuan 8. Donny Santoso 9. Syamsurizal 10. Elsa Andriana Mulyono 11. Erni Susanto 12. Eryna Wati Suteja 13. Gunarto 14. Gunawan 15. Harry Setiawan Ambarita 16. Hendry Widjaja 17. Hengky Halim 18. Heriyanti 19. Hertine 20. Siti Khodijah 21. Joseph Mangoloi Sinaga 22. Kerry Sumbadji 23. Liani Chandra 24. Lilyana 25. Lim Veronica Istika Halim 26. Linda Hati  Tergugat Defendant : 1. PT Asuransi Jiwasraya 2. PT Bank Rakyat Indonesia Tbk 3. PT Bank Tabungan Negara Tbk 4. PT Standard Chartered Bank Indonesia 5. PT Bank Victoria International Tbk 6. PT Bank KEB Hana Indonesia 7. PT Bank DBS Indonesia 8. Presiden Republik Indonesia Cq. Kementerian Badan Usaha Milik Negara Republik Indonesia President of the Republic of Indonesia Cq. Ministry of State-Owned Enterprises of the Republic of Indonesia 9. Presiden Republik Indonesia Cq. Kementerian Keuangan Republik Indonesia President of the Republic of Indonesia Cq. Ministry of Finance of the Republic of Indonesia 10. PT Bahana Pembinaan Usaha Indonesia 11. PT Asuransi Jiwa IFG 27. Lindawati Soetopo 28. Lisa Indriani 29. Marwin Candra Gunawan 30. Michael 31. Mona Rijan 32. Muhammad Riefky Putra Agusti 33. Nani Oktaviani Mutiara 34. Ratnawati Soewito 35. Parulian Sirait 36. Ronald Dalimartin 37. Ruth Theresia 38. Santoso 39. Sri Rejeki Siana 40. Sudimin 41. Susana Melly Ong 42. Theresia Linda Hanjayalo 43. Tomy Yoesman 44. Uswatun Khasana 45. V Yulivia Sannyta 46. Wahyuningsih 47. Widjiningsih 48. Wira Satria Hertanto 49. Wiwik Esti Komandari 50. Wiyana Alamanda 51. David Andreas Kostaman 52. Santoso Chandra
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Pokok Perkara Case Profile	Wanprestasi. Default.
Nilai Nominal Nominal Value	Rp50.685.200.000,- (tanggung renteng para tergugat). Rp50,685,200,000 (jointly and severally of the defendants).
Status Penyelesaian Perkara Case Settlement Status	Dalam proses di Pengadilan Negeri. On trial process at the District Court.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.

**Perkara / Case**  
**32/Pdt.Sus-GLL/2021/PN.Niaga.Jkt.Pst**

Para Pihak Parties	Penggugat : 1. Adji Waseso Hamid Plaintiff : 2. Luche Waseso Hamid Tergugat : Tim Kurator Shierly (dalam pailit) Defendant : Curator Team of Shierly (in bankruptcy) Turut Tergugat : 1. Trah Nugrahyang Co-Defendant : 2. Notaris Nawang Andi Kusuma 3. Notaris/Pejabat Pembuat Akta Tanah Etty Purwaningsih 4. Notaris/Pejabat Pembuat Akta Tanah Hartanti Kuntoro 5. PT Bank Victoria International Tbk 6. Kantor Pertanahan Kota Administrasi Jakarta Selatan 1. Trah Nugrahyang 2. Notary Nawang Andi Kusuma 3. Notary/Land Deed Official Etty Purwaningsih 4. Notary/Land Deed Official Hartanti Kuntoro 5. PT Bank Victoria International Tbk 6. Land Office of South Jakarta Administrative City
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Pokok Perkara Case Profile	Perbuatan melawan hukum. Tort.
Nilai Nominal Nominal Value	Rp9,612,000,000
Status Penyelesaian Perkara Case Settlement Status	Dalam proses di Pengadilan Negeri. On trial process at the District Court.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.

**Perkara / Case**  
**381/Pdt.G/2021/PN.Jkt.Utr**

Para Pihak Parties	Penggugat : PT Bank Victoria International Tbk Plaintiff Tergugat : 1. Trisna Aju Sjamsuri Defendant : 2. Ari Susanti 3. Lenny Murlin
Pokok Perkara Case Profile	Perbuatan melawan hukum. Tort.
Nilai Nominal Nominal Value	Rp8,424,757,517.28
Status Penyelesaian Perkara Case Settlement Status	Dalam proses di Pengadilan Negeri. On trial process at the District Court.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.

## Perkara Penting yang Dihadapi Entitas Anak Tahun 2021

## Cases Faced by Subsidiary Throughout on 2021

### Perkara / Case 675/Pdt.G/2016/PN.Jkt.Sel

Para Pihak Parties	Penggugat Plaintiff : Perintis Gunawan Tergugat Defendant : Agus Adriansyah Turut Tergugat Co-Defendant : 1. PT Bank Victoria Syariah 2. Badan Pertanahan Nasional Kabupaten Karawang Karawang Regency National Land Agency Office
Pokok Perkara Case Profile	Wanprestasi. Default.
Nilai Nominal Nominal Value	Rp100,000,000
Status Penyelesaian Perkara Case Settlement Status	Dalam proses banding di Pengadilan Tinggi. On the process of appeal at the Appellate Court.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.

### Perkara / Case 37/Pdt.G/2021/PN.Jkt.Sel

Para Pihak Parties	Penggugat Plaintiff : Afief Ubaidillah Tergugat Defendant : 1. Soleh Fatoni 2. Tengku Sandra Fauziah, SH, MKn 3. Hasti Sriwahyuni Turut Tergugat Co-Defendant : PT Bank Victoria Syariah
Pokok Perkara Case Profile	Perbuatan melawan hukum. Tort.
Nilai Nominal Nominal Value	Rp100,000,000
Status Penyelesaian Perkara Case Settlement Status	Dalam proses di Pengadilan Negeri. On trial process at the District Court.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.

### Perkara / Case No. Laporan Polisi LP/1920/K/XI/2015/PMJ/Restro Jaksel tanggal 12 November 2015 Police Report No. LP/1920/K/XI/2015/PMJ/Restro Jaksel dated 12 November 2015

Para Pihak Parties	Pelapor Reporting Party : PT Dunia Milik Bersama Terlapor Reported Party : PT Bank Victoria Syariah
Pokok Perkara Case Profile	Laporan polisi mengenai pemalsuan akta. Police report regarding deed forgery.
Nilai Nominal Nominal Value	Tidak ada. None.
Status Penyelesaian Perkara Case Settlement Status	Proses penyidikan di Kepolisian Resor Jakarta Selatan. Investigation process at South Jakarta Resort Police.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Risiko hukum dan risiko reputasi. Legal risk and reputation risk.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.

<b>Perkara / Case</b>	
<b>No. Laporan Polisi LP/4745/IX/2018/PMJ/Dit.Reskrimum tanggal 7 September 2018</b>	
<b>Police Report No. LP/4745/IX/2018/PMJ/Dit.Reskrimum dated 7 September 2018</b>	
Para Pihak Parties	Pelapor : PT Panah Jaya Steel Reporting Party Terlapor : PT Bank Victoria Syariah Reported Party
Pokok Perkara Case Profile	Laporan polisi mengenai pemalsuan akta. Police report regarding deed forgery.
Nilai Nominal Nominal Value	Tidak ada. None.
Status Penyelesaian Perkara Case Settlement Status	Proses penyelidikan di Kepolisian Resor Jakarta Utara. Investigation process at North Jakarta Resort Police.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Risiko hukum dan risiko reputasi. Legal risk and reputation risk.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.

<b>Perkara / Case</b>	
<b>No. 73/Pailit/2012/PN.Niaga.Jkt.Pst tanggal 21 Maret 2013</b>	
<b>No. 73/Pailit/2012/PN.Niaga.Jkt.Pst dated 21 March 2013</b>	
Para Pihak Parties	Pemohon Pailit : Loddy Suradinata Bankruptcy Petitioner Termohon Pailit I : PT Raka Media Swatama Bankruptcy Defendant I Termohon Pailit II : Yana Surya, SE (selaku pemilik jaminan nasabah PT Yoga Mandiri Utama) Bankruptcy Yana Surya, SE (as the owner of customer guarantee of PT Yoga Mandiri Utama) Petitioner II
Pokok Perkara Case Profile	Kepailitan. Bankruptcy.
Nilai Nominal Nominal Value	Tidak ada. None.
Status Penyelesaian Perkara Case Settlement Status	Penjualan aset boedel pailit bersamaan dengan Tim Kurator. The sale of bankruptcy assets in coordination with the Receiver.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Risiko hukum dan risiko reputasi. Legal risks and reputation risks.
Sanksi Administrasi Administrative Sanctions	Tidak ada. None.

## Perkara Penting yang Dihadapi Dewan Komisaris dan Direksi Tahun 2021

Tidak terdapat perkara penting yang dihadapi oleh Dewan Komisaris dan Direksi Bank Victoria dan Dewan Komisaris dan Direksi Entitas Anak sepanjang tahun 2021. Oleh karena itu, tidak terdapat informasi yang dapat disampaikan mengenai:

1. Para pihak;
2. Nilai nominal;
3. Status penyelesaian perkara;
4. Risiko yang dihadapi Bank;
5. Pengaruh terhadap Bank; dan
6. Sanksi administrasi.

## Cases Faced by the Board of Commissioners and Board of Directors on 2021

There were no significant cases faced by the Board of Commissioners and Board of Directors of Bank Victoria and the Board of Commissioners and Board of Directors of Subsidiary throughout 2021. Therefore, there is no information that can be submitted on:

1. Parties;
2. Nominal value;
3. Case settlement status;
4. Risks faced by the Bank;
5. Impact on the Bank; and
6. Administrative sanction.

## Sanksi Administrasi Administrative Sanctions

Pada tahun 2021, Bank Victoria, Dewan Komisaris, dan Direksi Bank tidak mendapat sanksi administratif dan sanksi finansial dari pihak otoritas terkait.

In 2021, Bank Victoria, the Board of Commissioners and the Board of Directors of the Bank were not subjected to administrative sanctions and financial sanctions from the relevant authorities.

## Program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme Anti Money Laundering and Counter-Terrorism Financing Program

Penyedia jasa keuangan, khususnya perbankan sangat rentan terhadap kemungkinan digunakannya lembaga tersebut sebagai media pencucian uang dan pendanaan terorisme. Selain itu, dengan semakin kompleksnya produk dan layanan jasa keuangan, termasuk pemasaran (*multi channel marketing*), serta penggunaan teknologi informasi yang semakin maju pada industri jasa keuangan, maka kemungkinan terjadinya risiko tersebut juga semakin meningkat.

Financial services providers, banks in particular, are extremely vulnerable to the possibility of being used as a money laundering media and terrorism financing. Furthermore, with the growing complexity of the financial products and financial services, including multi channel marketing, as well as the use of advanced information technology in financial services industry, the possibility of such risk will also increase.

Untuk mencegah hal itu terjadi, Bank menerapkan Undang-Undang Republik Indonesia No. 8 Tahun 2010 tentang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang, serta Peraturan Otoritas Jasa Keuangan No. 12/POJK.01/2017 tentang Penerapan Program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme di Sektor Jasa Keuangan. Berdasarkan peraturan tersebut, Bank menerapkan Program Anti Pencucian Uang (APU) dan Pencegahan Pendanaan Terorisme (PPT).

In order to prevent such issue, the Bank implements Law of the Republic of Indonesia No. 8 of 2010 on Prevention and Eradication of the Criminal Action of Money Laundering, and Financial Services Authority Regulation No. 23/POJK.01/2019 on Amendment to Financial Services Authority Regulation No. 12/POJK.01/2017 on Implementation of Anti Money Laundering and Counter-Terrorism Financing Program in Financial Services Sector. Based on these regulations, the Bank implements Anti Money Laundering (AML) and Counter-Terrorism Financing (CTF) Program.

Dalam rangka peningkatan kualitas penerapan program APU dan PPT agar dapat berjalan dengan efektif, Bank melakukan beberapa hal berikut.

1. Kebijakan dan prosedur, di antaranya meliputi:
  - a. Identifikasi dan verifikasi calon nasabah (termasuk *beneficial owner*);
  - b. *Customer due diligence* (CDD) atau penerapan prinsip-prinsip *know your customer* (KYC) dan *enhance due diligence* (EDD);
  - c. Penerapan *risk-based approach* (RBA);
  - d. Area berisiko tinggi dan *politically exposed person* (PEP);
  - e. Pelaksanaan CDD/KYC oleh pihak ketiga;
  - f. Pemantauan dan pelaporan;
  - g. Prosedur transfer dana;

In order to enhance the quality of AML and CTF programs so that they can run effectively, the Bank carries out the following actions.

1. Policies and Procedure, which include:
  - a. Identification and verification of potential customers (including *beneficial owner*);
  - b. *Customer due diligence* (CDD) or application of *know your customer* (KYC) and *enhance due diligence* (EDD) principles;
  - c. Application of *risk-based approach* (RBA);
  - d. High risk areas and *politically exposed person* (PEP);
  - e. Implementation of CDD/KYC by third parties;
  - f. Monitoring and reporting;
  - g. Fund transfer procedures;

- h. Sistem informasi manajemen;
- i. *Human Capital* dan pelatihan; serta
- j. Pengendalian Internal.

## 2. Pengawasan Manajemen

Direksi Bank bertanggung jawab untuk memastikan bahwa penerapan Prinsip APU dan PPT berjalan secara efektif dengan cara:

- a. Memastikan bahwa Bank telah mempunyai kebijakan dan prosedur penerapan program APU/PPT;
- b. Merekomendasikan kebijakan dan prosedur tentang program APU dan PPT kepada Dewan Komisaris;
- c. Memastikan bahwa pelaksanaan program APU dan PPT telah sesuai dengan kebijakan yang berlaku;
- d. Membentuk Unit Kerja khusus yang melaksanakan program APU-PPT dan/atau menunjuk Pejabat yang bertanggungjawab terhadap Program APU-PPT di Kantor Pusat;
- e. Memantau kepatuhan satuan kerja dalam menerapkan program APU-PPT;
- f. Memastikan kantor cabang wajib memiliki Unit Kerja khusus dan memiliki karyawan yang menjalankan fungsi Unit Kerja khusus atau pejabat yang mengawasi penerapan program APU-PPT;
- g. Memastikan kebijakan dan prosedur tentang program APU dan PPT telah sejalan dengan perubahan dan pengembangan produk, jasa, dan teknologi informasi perbankan serta sesuai dengan perkembangan modus pencucian uang atau pendanaan terorisme; dan
- h. Memastikan secara berkala bahwa seluruh karyawan, khususnya karyawan dari Unit Kerja terkait dan karyawan baru, telah berpartisipasi mengikuti program pelatihan mengenai APU dan PPT.

Dewan Komisaris bertanggung jawab:

- a. Menyetujui kebijakan tentang program APU dan PPT; serta
- b. Mengawasi pelaksanaan tugas dan tanggung jawab Direksi dalam melaksanakan program APU dan PPT.

## 3. Sumber Daya Manusia

Untuk menghasilkan sumber daya manusia yang mempunyai pengetahuan yang memadai dalam menjalankan tugas-tugasnya, Bank berkewajiban menyediakan program pelatihan bagi seluruh karyawan, khususnya terkait APU dan PPT. Terkait hal ini, Bank melaksanakan pelatihan dengan cakupan materi antara lain:

- a. Penerapan peraturan perundang-undangan yang terkait dengan program APU dan PPT;
- b. Tipologi pencucian uang dan pendanaan terorisme; serta
- c. Kebijakan dan prosedur internal penerapan program APU dan PPT, serta peran dan tanggung jawab karyawan dalam memberantas pencucian uang dan pendanaan terorisme.

- h. Management information system;
- i. Human capital and training; and
- j. Internal control.

## 2. Management Control

The Bank's Board of Directors is responsible for ensuring that the implementation of AML-CTF Principles works effectively by:

- a. Ensuring that the Bank has policies and procedures of AML-CTF programs;
- b. Recommending AML-CTF policies and procedure to the Board of Commissioners;
- c. Ensuring that the implementation of AML-CTF program is in accordance with the stipulated prevailing policies;
- d. Establishing a special Task Force to work on AML-CTF programs and/or appointing Officer in charge of AML-CTF programs at the Head Office;
- e. Monitoring the compliance of work units in implementing AML-CTF programs;
- f. Ensuring that branch offices must have a special Work Unit and have employees running the special Work Unit function or officers monitoring the implementation of AML-CTF programs;
- g. Ensuring that written policies and procedures related to AML-CTF are in-line with the changes and development of the Bank's products, services, and technology, and the development of mode of operation of money laundering or terrorism financing; and
- h. Ensuring that all employees, particularly those from the related Work Units, as well as new employees, participate in trainings related to AML-CTF programs periodically.

The Board of Commissioners is responsible for:

- a. Approving policies on AML-CTF programs; and
- b. Monitoring the implementation of Board of Directors' duties and responsibilities in implementing AML-CTF programs.

## 3. Human Resource

In order to produce human capital with adequate knowledge in carrying out their duties, the Bank must provide training programs for all of its employees, especially related to AML and CTF. With relation to that, trainings are held among others with the following materials:

- a. Implementation of laws and regulations related to AML-CTF programs;
- b. Typology of money laundering and terrorism financing; and
- c. Internal policies and procedures for the implementation of AML-CTF programs, as well as employees' roles and responsibilities in combating money laundering and terrorism financing.



#### 4. Audit dan Kepatuhan

Guna menguji efektivitas pelaksanaan program APU-PPT serta pelaksanaannya telah sesuai dengan ketentuan yang berlaku, maka diperlukan pemantauan oleh pihak independen secara berkala oleh auditor internal dan eksternal.

Di sepanjang tahun 2021, tidak ditemukan indikasi terjadinya tindak pidana pencucian uang dan pendanaan terorisme di Bank Victoria.

#### 4. Audit and Compliance

In order to test the effective execution of AML-CTF and to ensure that the implementation is in line with the prevailing laws, periodical monitoring by an independent party such as internal auditor and external auditor is needed.

Throughout 2021, there was no indication of money laundering and terrorism financing criminal act occurring at Bank Victoria.

## Pemberian Dana Kegiatan Politik Provision of Funds for Political Activities

Pada tahun 2021, Bank Victoria tidak terlibat di dalam kegiatan politik, serta tidak memberikan dana untuk kepentingan politik.

In 2021, Bank Victoria was not involved in political activities, nor did it provide funds for political purposes.

## Kode Etik Code of Conduct

Bank senantiasa menjunjung tinggi integritas dan berkomitmen untuk menerapkan standar yang tinggi tentang Kode Etik yang dapat menggambarkan praktik-praktik bisnis yang sehat serta penerapan prinsip GCG. Untuk mendukung hal tersebut, maka dalam pelaksanaannya, Bank memiliki dan menerapkan pedoman standar mengenai tata cara perilaku, yaitu Pedoman Kode Etik Karyawan yang mengatur standar, perilaku bisnis, serta tingkah laku pribadi yang etis bagi seluruh karyawan dan pemangku kepentingan dalam berperilaku di lingkungan kerja.

The Bank constantly upholds its integrity and is fully committed to applying a high standard on Code of Conduct that reflects sound business practices and the implementation of GCG principles. In order to support this, in the execution, the Bank possesses and implements standard guideline, which is the Employee's Code of Conduct, that regulates behavior, business conduct, and personal conduct to all of the employees and relevant stakeholders in their work environment.

### Pokok Isi Kode Etik

Direksi melalui Surat Keputusan Direksi No. 001/SK-DIR/01/21 tanggal 11 Januari 2021 tentang Pedoman Kode Etik Karyawan PT Bank Victoria International Tbk, menetapkan pokok-pokok Kode Etik sebagai berikut.

### Principles of Code of Conduct

The Board of Directors under Board of Directors' Decision Letter No. 001/SK-DIR/01/21 dated 11 January 2021 on Employee's Code of Conduct of PT Bank Victoria International Tbk stipulates the principles of the Code of Conduct as follows.

### Standar Etika Bisnis Standard Business Ethics



Etika Bank dengan karyawan  
Bank's Ethics with employees



Etika Bank dengan nasabah  
Bank's Ethics with customers



Etika Bank dengan penyedia barang dan jasa  
(evaluasi yang objektif dalam pengadaan perlengkapan dan peralatan Bank)  
Bank's Ethics with provider of goods and services  
(objective evaluation in the procurement of the Bank's equipment and tools)



Etika Bank dengan pesaing  
Bank's Ethics with competitors



Etika Bank dengan pemerintah  
Bank's Ethics with the government



Etika Bank dengan masyarakat  
Bank's Ethics with the communities



Etika Bank dengan media massa  
Bank's Ethics with mass media



Etika Bank dengan organisasi profesi  
Bank's Ethics with professional organizations

### Standar Perilaku Karyawan Standard Code of Conduct



Tuntunan perilaku karyawan  
Employee behavior guidelines



Penanganan benturan kepentingan  
Management of conflict of interest



Pedoman pemberian dan penerimaan hadiah dan donasi  
Guidelines for giving and receiving gifts and donations



Pedoman kepatuhan terhadap peraturan  
Regulatory compliance guidelines



Pedoman menjaga kerahasiaan data dan informasi perusahaan  
Guidelines for maintaining confidentiality of company data and information



Pedoman aktivitas politik  
Political activity guidelines



Pedoman pelaporan atas pelanggaran dan perlindungan pelapor  
Guidelines for reporting violations and protection of whistleblower

## Komitmen Kepatuhan terhadap Kode Etik

Bank Victoria senantiasa berkomitmen untuk mematuhi Kode Etik sebagai standar etika tertinggi selain peraturan perundang-undangan yang berlaku dalam menjalankan setiap kegiatan bisnis maupun operasional. Seluruh insan Bank, mulai dari Dewan Komisaris, Direksi, Pejabat Eksekutif, sampai dengan karyawan diwajibkan untuk mematuhi Kode

## Commitment to Complying with Code of Conduct

In carrying out business activities and operations, Bank Victoria is constantly committed to complying with the Code of Conduct as the highest ethical standards in addition to the applicable laws and regulations. All Bank personnel, starting from the Board of Commissioners, Board of Directors, Executive Officials, to employees are required to adhere to the Code of Conduct and

Etik dan menandatangani Surat Pernyataan yang dimuat pada halaman akhir Kode Etik untuk meningkatkan dan memperkuat penerapan Kode Etik dan reputasi Bank.

sign a Statement Letter contained in the final page of the Code of Conduct to improve and strengthen the implementation of Code of Conduct and the Bank' reputation.

**SURAT PERNYATAAN  
STATEMENT LETTER**

Saya yang bertanda tangan di bawah ini, dengan ini menyatakan sudah membaca, mempelajari, dan mengerti Kode Etik Perilaku Karyawan PT Bank Victoria International Tbk dan berjanji untuk mentaati dan melaksanakannya dengan sebaik-baiknya.

I, the undersigned, hereby declare that I have read, learned, and understood the Employee's Code of Conduct of PT Bank Victoria International Tbk and promise to adhere to and implement it to the best measure possible.

Saya bersedia dikenakan sanksi sesuai dengan aturan yang berlaku di PT Bank Victoria International Tbk, bila ternyata dikemudian hari saya melakukan pelanggaran atas Kode Etik Perilaku Karyawan PT Bank Victoria International Tbk.

I am willing to be sanctioned according to the regulations applicable at PT Bank Victoria International Tbk, if in the future I have apparently violated the Employee's Code of Conduct of PT Bank Victoria International Tbk.

.....2021  
Yang Membuat Pernyataan / Person Making Statement,

(.....)  
Jabatan / Position:  
Bagian / Department:

**Penyebarluasan dan Sosialisasi Kode Etik**

Upaya penyebarluasan dan sosialisasi Kode Etik yang dilakukan Bank sebagai berikut.

1. Kode Etik diungkapkan dan/atau disebarkan kepada seluruh karyawan melalui media internal Bank yang dapat diakses dan dibuka setiap saat oleh semua karyawan;
2. Bank menyampaikan etika bisnis secara berkala melalui media memo dan/atau surat dari Direksi ataupun Divisi yang bertanggung jawab dalam mengelola etika bisnis untuk dapat dilaksanakan secara tertib;
3. Mengungkapkan dan menyampaikan Kode Etik melalui pembagian buku saku yang wajib dipelajari dan dilaksanakan oleh setiap karyawan Bank; dan
4. Bank senantiasa mengingatkan penerapan Kode Etik kepada seluruh karyawan melalui berbagai pelatihan, pelaksanaan induksi untuk para karyawan baru, serta melalui forum-forum pelatihan yang melibatkan pihak eksternal.

**Circulation and Dissemination of Code of Conduct**

The efforts carried out by the Bank to circulate and disseminate Code of Conduct are as follows:

1. Code of Conduct is disclosed and/or distributed to all employees through the Bank's internal media accessible by all employees and available at any time;
2. The Bank periodically disseminates the business ethics through memos and/or letters from the Board of Directors or Divisions responsible for managing business ethics for proper implementation.
3. The Code of Conduct is disclosed and distributed through the distribution of pocket book that must be studied and carried out by every Bank employee; and
4. The Bank constantly reminds all its employees on the implementation of Code of Conduct through various training programs, induction training programs for new employees, and through training forums involving external parties.

**Upaya Penerapan dan Penegakan Kode Etik**

**Penerapan dan Penegakan secara Organisasi**

1. Dewan Komisaris dibantu oleh Komite Nominasi dan Remunerasi bertanggung jawab atas dipatuhinya Kode Etik di lingkungan Bank;
2. Direksi dibantu oleh Divisi *Human Capital Management* bertanggung jawab atas penerapan Kode Etik di lingkungan Bank;

**Efforts to Implement and Enforce Code of Conduct**

**Implementation and Enforcement of Code of Conduct**

1. The Board of Commissioners, supported by the Nomination and Remuneration Committee, is responsible for the compliance of the Code of Conduct within the Bank;
2. The Board of Directors, assisted by the Human Capital Management Division, is responsible for the implementation of Code of Conduct within the Bank;

3. Kepala Divisi, Manajer, dan setingkat Manajer bertanggung jawab atas penerapan Kode Etik di lingkungan Divisi/Unit Kerja masing-masing;
  4. Direksi menunjuk Kepala Divisi *Human Capital Management* beserta jajarannya yang bertanggung jawab untuk melaporkan pelanggaran terhadap pelaksanaan Kode Etik; dan
  5. Setiap karyawan wajib membaca Kode Etik melalui intranet dan menandatangani formulir pernyataan bahwa yang bersangkutan telah membaca, memahami, dan setuju untuk mematuhi Kode Etik yang didokumentasikan oleh Divisi *Human Capital Management*.
3. The Head of Division, Manager, and managerial levels are responsible for the implementation of Code of Conduct in their respective Division/Unit;
  4. The Board of Directors appoints Head of Human Capital Management Division including its personnel to be the whistleblower in any violation against the Code of Conduct; and
  5. It is mandatory for each and every employee to read the Code of Conduct through intranet and sign the statement letter to declare that the respectiver person has read, understood, and agreed to comply with the Code of Conduct, which thereafter documented by the Human Capital Division.

### Penegakan Pedoman Kode Etik

1. Setiap karyawan Bank harus melaporkan setiap fakta penyimpangan Pedoman Kode Etik Perilaku Karyawan kepada Divisi *Human Capital Management* dan identitas pelapor akan dilindungi;
2. Divisi *Human Capital Management* menindaklanjuti setiap laporan dan menyampaikan hasil kajiannya kepada Direksi dan/atau Dewan Komisaris sesuai dengan lingkup tanggung jawabnya. Penanganan tindakan penyimpangan terhadap Pedoman Kode Etik Perilaku Karyawan dilakukan melalui penyelidikan yang mendalam dan didasari fakta-fakta yang dapat dipertanggungjawabkan;
3. Direksi dan Dewan Komisaris memutuskan tindakan pembinaan, sanksi disiplin dan/atau tindakan perbaikan serta pencegahan yang harus dilaksanakan oleh atasan langsung di lingkungan masing-masing;
4. Pemberian sanksi bagi pelaku penyimpangan Pedoman Kode Etik Perilaku Karyawan; dan
5. Bank memiliki pertimbangan dan hak apabila karyawan melanggar Kode Etik/Peraturan Perusahaan/sistem prosedur dengan memberikan langsung surat peringatan ketiga kepada karyawan yang dinilai melakukan penyimpangan berat tanpa perlu surat peringatan pertama dan surat peringatan kedua.

### Bentuk Pelanggaran dan Jenis Sanksi

Bank Victoria memberlakukan pemberian sanksi bagi mereka yang melakukan penyimpangan Kode Etik dengan pertimbangan-pertimbangan berikut.

1. Dilihat dari akibat perbuatan yang dilakukan; serta
2. Dilihat dari derajat kesengajaan dan motif tindakan.

Sementara itu, bentuk sanksi atas penyimpangan tersebut antara lain teguran lisan, surat peringatan pertama, kedua, sampai dengan ketiga, tidak memperoleh bonus umum tahunan dan atau bonus prestasi, tidak memperoleh kenaikan gaji dan/atau kenaikan pangkat untuk periode waktu tertentu, *skorsing* (dirumahkan sementara), demosi (penurunan pangkat atau posisi), pemutusan hubungan kerja (PHK).

### Enforcement of Code of Conduct

1. Each of the Bank's employee must report each fact of violation against Employee's Code of Conduct to the Human Capital Management Division and the identity of the whistleblower will be protected.
2. Human Capital Management Division will follow up each report to and submit the assessment result to the Board of Directors and/or Board of Commissioners according to the scope of responsibility. Such violation against Employee's Code of Conduct will be handled by in-depth investigation based on accountable facts.
3. The Board of Directors and Board of Commissioners will make a decision on a directional action, disciplinary sanction and/or correctional action and to come up with prevention to be implemented by the direct supervisor in the respective scope;
4. The imposition of sanction for the party violating the Employee's Code of Conduct; and
5. The Bank maintains its discretion and right, in the event an employee violates the Code of Conduct/ Company Regulations/ Procedures, by directly giving third warning letter to the relevant employee who is deemed of conducting serious violation without first giving first and second warning letter.


### Forms and Types of Sanction

Bank Victoria imposes sanction to those who vialote the Code of Conduct under the following considerations.

1. In consideration of the impact of the action; and
2. In consideration of the degree of intention and motives of the action.

Meanwhile, the forms of sanctions for such irregularities include verbal warning, first, second, and third warning letters, not receiving annual general bonus and/or achievement bonus, not getting salary increment and/or promotion for a certain period, suspension (temporary), demotion (demotion of rank or position), and termination of employment (PHK).

### Bentuk Pelanggaran Forms Violation



### Jenis Sanksi Types of Sanction

- Ringan / Minor**
  - Kejadian pertama, minimal teguran lisan dan maksimal surat peringatan pertama.
  - Kejadian kedua, minimal surat peringatan maksimal surat peringatan ketiga.
  - Kejadian ketiga dan seterusnya minimal surat peringatan kedua dan maksimal pengunduran diri.
  - First incident, verbal reprimand at minimum, and first warning letter at maximum.
  - Second incident, second warning letter at minimum, third warning letter at maximum.
  - Third incident and so on, second warning letter at minimum and resignation at maximum.
- Sedang / Moderate**
  - Kejadian pertama minimal surat peringatan pertama dan maksimal surat peringatan kedua.
  - Kejadian kedua, minimal surat peringatan kedua dan maksimal pengunduran diri.
  - First incident, first warning letter at minimum and second warning letter at maximum.
  - Second incident, second warning letter at minimum and resignation at maximum.
- Berat / Severe**
  - Kejadian pertama, minimal tidak diberikan kenaikan gaji dan maksimal pengunduran diri.
  - First incident, no salary increments at minimum and resignation at maximum.

## Laporan Penyimpangan Internal Tahun 2021

Bank senantiasa memberikan sanksi bagi pelaku pelanggaran Kode Etik. Pemberian sanksi bagi karyawan yang melanggar Kode Etik dilakukan sesuai dengan aturan kepegawaian yang berlaku. Sedangkan, pemberian sanksi bagi Dewan Komisaris dan Direksi yang melanggar Kode Etik dilakukan sesuai dengan ketentuan pada Anggaran Dasar Bank dan keputusan RUPS. Pada tahun 2021, informasi pelanggaran Kode Etik diuraikan sebagai berikut.

## Internal Deviation Report in 2021

Bank Victoria has consistently imposed strict sanctions against the violation of Code of Conduct. Violations committed by employees will be sanctioned according to the applicable employment regulations. Whereas, sanctions against the Board of Commissioners and Board of Directors will be according to the provisions of the Bank's Articles of Association and the GMS resolutions. Information on Code of Conduct violations occurred during the year 2021 is as follows.

Bentuk Pelanggaran Forms Violation	Surat Peringatan Warning Letter		Surat Teguran Reprimand Letter	
	2021	2020	2021	2020
Ringan Minor	17	19	32	82
Sedang Moderate	4	5	-	-
Berat Severe	-	6	-	-
<b>Total</b>	<b>21</b>	<b>30</b>	<b>32</b>	<b>82</b>

### Trend Kualitas Penerapan Kode Etik

Kualitas penerapan Kode Etik di Bank Victoria telah berjalan cukup baik. Karyawan Bank Victoria telah mematuhi seluruh peraturan yang tercantum dalam Kode Etik.

### Trend on Quality of Code of Conduct Implementation

The quality of Code of Conduct implementation at Bank Victoria has been running quite well. Bank Victoria's employees have complied with all regulations set out in the Code of Conduct.

## Kebijakan Anti Korupsi

### Anti Corruption Policy

Pelaksanaan kebijakan anti korupsi pada Bank dilakukan melalui kegiatan-kegiatan sebagai berikut.

1. Pencegahan Benturan Kepentingan  
Guna menghindari benturan kepentingan dalam melaksanakan segala aktivitas yang terkait dengan Bank, seluruh karyawan Bank berpedoman pada Kode Etik Perilaku Karyawan.
2. Pemberian dan Penerimaan Hadiah atau Donasi  
Kebijakan Bank terkait pemberian dan penerimaan hadiah atau donasi, sebagai berikut.
  - a. Dilarang meminta atau memberi isyarat yang mengesankan suatu permintaan berupa uang, barang, tip, komisi, atau surat apapun kepada nasabah atau calon nasabah;
  - b. Dilarang menerima pemberian dari nasabah atau calon nasabah baik berupa uang, barang, tip, komisi, atau sesuatu apapun yang dapat menyebabkan utang budi karyawan kepada nasabah, sehingga dapat mempengaruhi karyawan dalam mengambil keputusan objektif bila terjadi masalah antara Bank dengan nasabah;
  - c. Karyawan dilarang menggunakan fasilitas atau jasa yang ditawarkan oleh nasabah atau calon nasabah karena hubungan baik yang telah dibina, untuk kepentingan pribadi atau keluarga yang dapat menimbulkan benturan kepentingan pada tugas karyawan; dan
  - d. Karyawan dilarang menerima penjamuan (hiburan) yang berlebihan dari pihak nasabah. Demikian pula karyawan dilarang mengadakan penjamuan berlebihan yang dapat menimbulkan citra negatif di masyarakat terhadap nama baik Bank dan nama baik karyawan yang bersangkutan.

### Sosialisasi Kebijakan Anti Korupsi

Bank Victoria melakukan sosialisasi terkait kebijakan anti korupsi yang dimuat dalam Kode Etik dengan cara disebarakan kepada seluruh karyawan Bank melalui media internal sehingga dapat diakses dengan mudah setiap saat oleh semua karyawan Bank.

Bank Victoria applies anti-corruption policy in the Bank through the following activities.

1. Prevention of Conflict of Interest  
To avoid conflicts of interest in carrying out all activities related to the Bank, all employees must refer to the Employee's Code of Conduct.
2. Giving and Receiving Gifts or Donations  
The Bank's policies with regards to giving and receiving gifts or donations are as follows:
  - a. It is prohibited to ask or give an impression of requesting for money, goods, tips, commissions, or any letter to a customer or prospective customer;
  - b. It is prohibited to receive gifts from customers or prospective customers in the form of money, goods, tips, commissions, or anything that can cause employees' debt of deeds to customers, that may influence the employees in making objective decisions in the event of a problem between the Bank and the customer;
  - c. It is prohibited to use facilities or services offered by customers or prospective customers due to the good relationships that have been fostered, for personal or family interests that can cause conflicts of interest in the employees' duties; and
  - d. It is prohibited to accept excessive entertainment from the customer. Likewise, employees are not permitted to hold excessive entertainment that can create a negative image in the community on the Bank's reputation and the employee's reputation.

### Dissemination of Anti Corruption Policy

Bank Victoria conducts dissemination related to anti-corruption policy as set out in the Code of Conduct and distributed to all of the Bank's employees through internal media which can be conveniently accessed by all of the Bank's employees at anytime.

## Pengendalian Gratifikasi Gratification Control

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Dalam mengendalikan gratifikasi di Bank Victoria, prinsip-prinsip GCG serta nilai-nilai dari Kode Etik Bank senantiasa dijunjung tinggi. Terkait hal ini, Dewan Komisaris, Direksi, Pejabat Eksekutif, Pimpinan Kantor, seluruh karyawan Bank, serta anggota keluarganya tidak diperbolehkan menerima pemberian dalam bentuk apapun, baik secara langsung maupun tidak langsung dari nasabah, sebagaimana telah diatur dalam Kode Etik Bank Victoria.

### Pengelolaan Pengendalian Gratifikasi

Pengelolaan pengendalian gratifikasi Bank Victoria dilakukan melalui penerapan kewajiban pelaporan gratifikasi/parcel dalam bentuk apapun. Apabila Dewan Komisaris, Direksi, Pejabat Eksekutif, Pimpinan Kantor, karyawan Bank Victoria, serta anggota keluarganya mendapatkan gratifikasi/parcel dalam bentuk apapun, maka pihak tersebut wajib mengisi formulir penerimaan gratifikasi/parcel dan diserahkan kepada Divisi SKAI/*Integrated & Anti Fraud* untuk ditindaklanjuti.

### Sosialisasi Kebijakan Pengendalian Gratifikasi

Bank Victoria melakukan sosialisasi terkait kebijakan gratifikasi yang dimuat dalam Kode Etik dengan cara disebarluaskan kepada seluruh karyawan Bank melalui media internal sehingga dapat diakses dengan mudah setiap saat oleh semua karyawan Bank.

### Laporan Gratifikasi Tahun 2021

Selama tahun 2021, tidak terdapat laporan gratifikasi yang mengandung *fraud* yang disampaikan kepada SKAI/*Integrated & Anti Fraud*.

## Sistem Pelaporan Pelanggaran Whistleblowing System

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Bank berkomitmen untuk menjalankan prinsip GCG dalam operasional Bank guna mendukung keberlanjutan bisnis (*business sustainability*) sesuai dengan Visi dan Misi Bank yang telah ditetapkan. Oleh karena itu, Bank membentuk sistem pelaporan pelanggaran (*whistleblowing system/WBS*) sebagai

In order to control gratification in Bank Victoria, GCG principles and Bank's Code of Conduct value must consistently be upheld. With regards to this, the Board of Commissioners, Board of Directors, Executive Officials, Office Heads, and all employees of the Bank, including their family members are not allowed to receive any gratification in any form whatsoever, either directly or indirectly from the customers, as regulated in Bank Victoria's Code of Conduct.

### Management of Gratification Control

Management of gratification control in Bank Victoria is implemented through the obligation to report gratification/parcel in any form whatsoever. If the Board of Commissioners, Board of Directors, Executive Officials, Office Heads, and all employees of Bank Victoria including all of their family members receive any gratification/parcel in any form whatsoever, such party is obliged to complete gratification/parcel form and submit the form to the SKAI/*Integrated & Anti Fraud* Division for follow up.

### Dissemination of Gratification Control Policy

Bank Victoria conducts dissemination regarding gratification policy which is set out in the Code of Conduct by distributing it to all of the Bank's employees in an internal media so it can be conveniently accessed by all of the Bank's employees.

### Gratification Report in 2021

Throughout 2021, there were no gratification reports containing fraud submitted to SKAI/*Integrated & Anti-Fraud*.

The Bank is committed to implementing GCG principles in its operations in order to support business sustainability according to the Bank's established Vision and Mission. As such, the Bank established a Whistleblowing System (WBS) as a communication channel to facilitate whistleblower in reporting



saluran komunikasi yang memfasilitasi *whistleblower*/pelapor untuk melaporkan perilaku yang melanggar hukum dan/atau perbuatan tidak etis yang dilakukan oleh insan Bank.

any behavior that violates the laws and/or any unethical actions committed by the Bank's personnel.

## Kebijakan Sistem Pelaporan Pelanggaran

Kebijakan WBS Bank dituangkan dalam Surat Keputusan Direksi No. 002/SK-DIR/08/20 tentang Kebijakan dan Standar Operasional Prosedur Penerapan Strategi Anti Fraud PT Bank Victoria International Tbk. Kebijakan WBS tersebut mengacu pada peraturan perundang-undangan yang telah dikeluarkan oleh regulator, di antaranya:

## Whistleblowing System Policy

The Bank's WBS policy is stated in the Board of Directors' Decision Letter No. 002/SK-DIR/08/20 on Policies and Standard Operating Procedures for the Implementation of Anti-Fraud Strategy of PT Bank Victoria International Tbk. Such WBS policy refers to the laws and regulations issued by the regulators, among others:

### Undang-Undang Laws

1. Undang-Undang No. 10 Tahun 1998 tentang Perbankan;
  2. Undang-Undang No. 8 Tahun 1995 tentang Pasar Modal;
  3. Undang-Undang No. 13 Tahun 2003 tentang Ketenagakerjaan;
  4. Undang-Undang No. 13 Tahun 2006 tentang Perlindungan Saksi dan Korban;
  5. Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas; serta
  6. Undang-Undang No. 8 Tahun 2010 tentang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang.
1. Law No. 10 of 1998 on Banking;
  2. Law No. 8 of 1995 on Capital Market;
  3. Law No. 13 of 2003 on Manpower;
  4. Law No. 13 of 2006 on Protection of Witness and Victim;
  5. Law No. 40 of 2007 on Limited Liability Company; and
  6. Law No. 8 of 2010 on the Prevention and Eradication of the Criminal Act of Money Laundering.

### Peraturan Pemerintah Government Regulations

1. Peraturan Pemerintah No. 45 Tahun 1995 tentang Penyelenggaraan Kegiatan di Bidang Pasar Modal; serta
  2. Peraturan Pemerintah No. 57 Tahun 2003 tentang Tata Cara Perlindungan Khusus bagi Pelapor dan Saksi Tindak Pidana Pencucian Uang.
1. Government Regulation No. 45 of 1995 on Implementation of Activities in Capital Market Sector; and
  2. Government Regulation No. 57 of 2003 on Procedures of Special Protection for Whistleblower and Witness of the Criminal Act of Money Laundering.

### Peraturan Kapolri Head of Police Regulations

Peraturan Kapolri No. 17 Tahun 2005 tentang Tata Cara Perlindungan Khusus bagi Pelapor dan Saksi Tindak Pidana Pencucian Uang.

Head of Police Regulation No. 17 of 2005 on Procedures of Special Protection for Whistleblower and Witness of the Criminal Act of Money Laundering.

### Peraturan Otoritas Jasa Keuangan Financial Services Authority Regulations

1. Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 tentang Penerapan Tata Kelola bagi Bank Umum;
  2. Peraturan Otoritas Jasa Keuangan No. 12/POJK.01/2017 tentang Penerapan Program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme di Sektor Jasa Keuangan; serta
  3. Peraturan Otoritas Jasa Keuangan No. 39/POJK.03/2019 tentang Penerapan Strategi *Anti Fraud* bagi Bank Umum.
1. Financial Services Authority Regulation No. 55/POJK.03/2016 on Implementation of Good Corporate Governance for Commercial Bank;
  2. Financial Services Authority Regulation No. 12/POJK.01/2017 on the Implementation of Anti-Money Laundering and Counter-Terrorism Financing Program in Financial Services Sector; and
  3. Financial Services Authority Regulation No. 39/POJK.03/2019 on Implementation of Anti-Fraud Strategy for Commercial Banks.

### Surat Edaran Otoritas Jasa Keuangan Financial Services Authority Circulars

Surat Edaran Bank Indonesia No. 13/28/DPNP tanggal 9 Desember 2011 tentang Penerapan Strategi *Anti fraud* bagi Bank Umum.

Bank Indonesia Circular No. 13/28/DPNP dated 9 December 2011 on the Implementation of Anti-fraud Strategy for Commercial Bank.

Kebijakan WBS Bank mengatur struktur pengelolaan WBS, mekanisme kerja, mulai dari pelaporan pelanggaran, landasan hukum perlindungan pelapor, perlindungan yang diberikan, serta *monitoring* dan *review*. Kebijakan WBS juga mengatur kewajiban Tim Pengelola WBS untuk:

1. Melaksanakan program promosi dan sosialisasi secara ekstensif dan intensif supaya pelaksanaan prosedur WBS dapat dipahami dengan benar;
2. Menyelenggarakan tata laksana organisasi sedemikian rupa sehingga laporan pelanggaran yang disampaikan dapat ditangani dengan baik serta terdokumentasi dengan baik, namun kerahasiaan pelapor juga tetap terjaga;
3. Melakukan laporan setiap semester kepada Direksi tentang pelaksanaan program WBS terkait laporan dugaan pelanggaran, meliputi sekurang-kurangnya:
  - a. Apakah prosedur WBS dapat diterapkan dengan baik dan mendapatkan sambutan yang positif dari karyawan ataupun para pemangku kepentingan lainnya?
  - b. Apakah prosedur WBS cukup efektif dalam melakukan deteksi dini dan pencegahan penyimpangan ataupun pelanggaran?
  - c. Apakah terdapat suatu pola pelanggaran tertentu yang sering berulang? Apakah kira-kira penyebabnya?
  - d. Saran perbaikan untuk meningkatkan efektivitas penerapan WBS dalam mencapai sasaran penciptaan iklim kerja yang terbuka, tulus, dan bertanggung jawab.

## Sosialisasi Kebijakan Sistem Pelaporan Pelanggaran

Untuk meningkatkan pemahaman mengenai WBS, Bank melakukan sosialisasi kebijakan WBS kepada kalangan internal dan eksternal Bank. Di kalangan internal, sosialisasi kebijakan WBS dilakukan oleh Tim Pengelola WBS kepada seluruh karyawan melalui forum pelatihan, serta melalui *e-mail* yang setiap bulan dikirimkan kepada seluruh karyawan. Sedangkan, sosialisasi kebijakan WBS dilakukan melalui situs web Bank dan berbagai media, seperti buletin internal, poster, sosialisasi etika, maupun presentasi langsung kepada pihak terkait.

## Jenis Pelanggaran yang Dapat Dilaporkan

Beberapa jenis pelanggaran dan penyimpangan yang dapat dilaporkan berdasarkan kebijakan WBS Bank, namun tidak terbatas pada:

1. Seluruh tindakan melanggar hukum pidana (misalnya: pencurian, penipuan, penggunaan narkoba, dan lain sebagainya);
2. Penyalahgunaan wewenang dalam melayani nasabah, debitur, vendor atau pemasok lainnya (misalnya: penundaan pembayaran tidak beralasan, pemerasan, dan lain sebagainya);

The Bank's WBS policy governs the WBS management structure, work mechanisms, starting from violation reporting, legal basis of whistleblower protection, protection provided, and monitoring and review. The WBS policy also regulates the obligations of WBS managing team to:

1. Carry out an extensive and intensive promotion and dissemination program so that the implementation of WBS procedures can be understood correctly;
2. Conduct organizational governance in such a way that the violation report submitted can be handled properly and well documented, but the confidentiality of the reporter is also guaranteed;
3. Conduct a semester report to the Board of Directors on the implementation of WBS program on allegedly infringement reports, which include at least:
  - a. Is the WBS procedure properly implemented and gained positive response from employees or other stakeholders?
  - b. Is the WBS procedure effective enough in early detection and prevention of irregularities or offenses?
  - c. Is there any particular pattern of repeated violations? What are the causes?
  - d. Suggestions for improvement to increase the effectiveness of WBS implementation in achieving the objectives of creating an open, sincere, and responsible work climate.

## Dissemination of Whistleblowing System Policy

In order to improve comprehension related to WBS, the Bank conducts dissemination regarding WBS policy in the Bank's internal and external circle. In the internal circle, the dissemination of WBS policy is conducted by the WBS Management Team to all employees through training programs, and through emails which are sent monthly to all employees, while dissemination of WBS policy is also conducted through the Bank's website and various media such as internal bulletin, poster, dissemination of ethics, and direct presentations to the related parties.

## Types of Violation that Can Be Reported

Several violations and deviations that can be reported based on the Bank's WBS policy are including but not limited to:

1. All actions that violate criminal law (e.g. theft, fraud, drug use, etc.);
2. Misuse of authority in serving the customers, debtors, vendors, or other suppliers (e.g. unwarranted payment delays, extortion, etc.);

3. Pelanggaran peraturan perbankan yang diatur dalam Undang-undang tentang Perbankan (misalnya: tidak melaksanakan prinsip kehati-hatian, membuka rahasia nasabah kepada yang tidak berhak, melakukan pencatatan yang tidak benar, meminta uang atas jasa pelayanan perbankan yang dilakukan);
  4. Pelanggaran peraturan perpajakan atau aturan pelaporan keuangan perusahaan yang tidak sesuai dengan PSA;
  5. Perbuatan yang dapat merugikan Bank, baik finansial maupun non-finansial, termasuk menciderai citra Bank;
  6. Pelanggaran aturan internal (SOP) yang dapat menciderai integritas pelaporan perusahaan, baik di bidang keuangan ataupun bidang lainnya; dan
  7. Perbuatan yang membahayakan keselamatan dan kesehatan kerja.
3. Violation of banking regulations stipulated in Banking Law (for example: not practicing prudent principles, disclosing customers' confidential information to unauthorized parties, making incorrect records, asking for money for the banking services performed);
  4. Violations of tax regulations or corporate financial reporting regulations that are not in accordance with PSAK;
  5. Acts that may harm the Bank, both financially and non-financially, including harm the Bank's image;
  6. Violations of internal rules (SOP) that may jeopardize the integrity of the corporate reporting, whether in finance or other fields; and
  7. Acts that endanger occupational safety and health.

## Media dan Pihak yang Mengelola Pelanggaran

Bank Victoria menerapkan media pelaporan pelanggaran yang terdiri dari beberapa cara berikut.

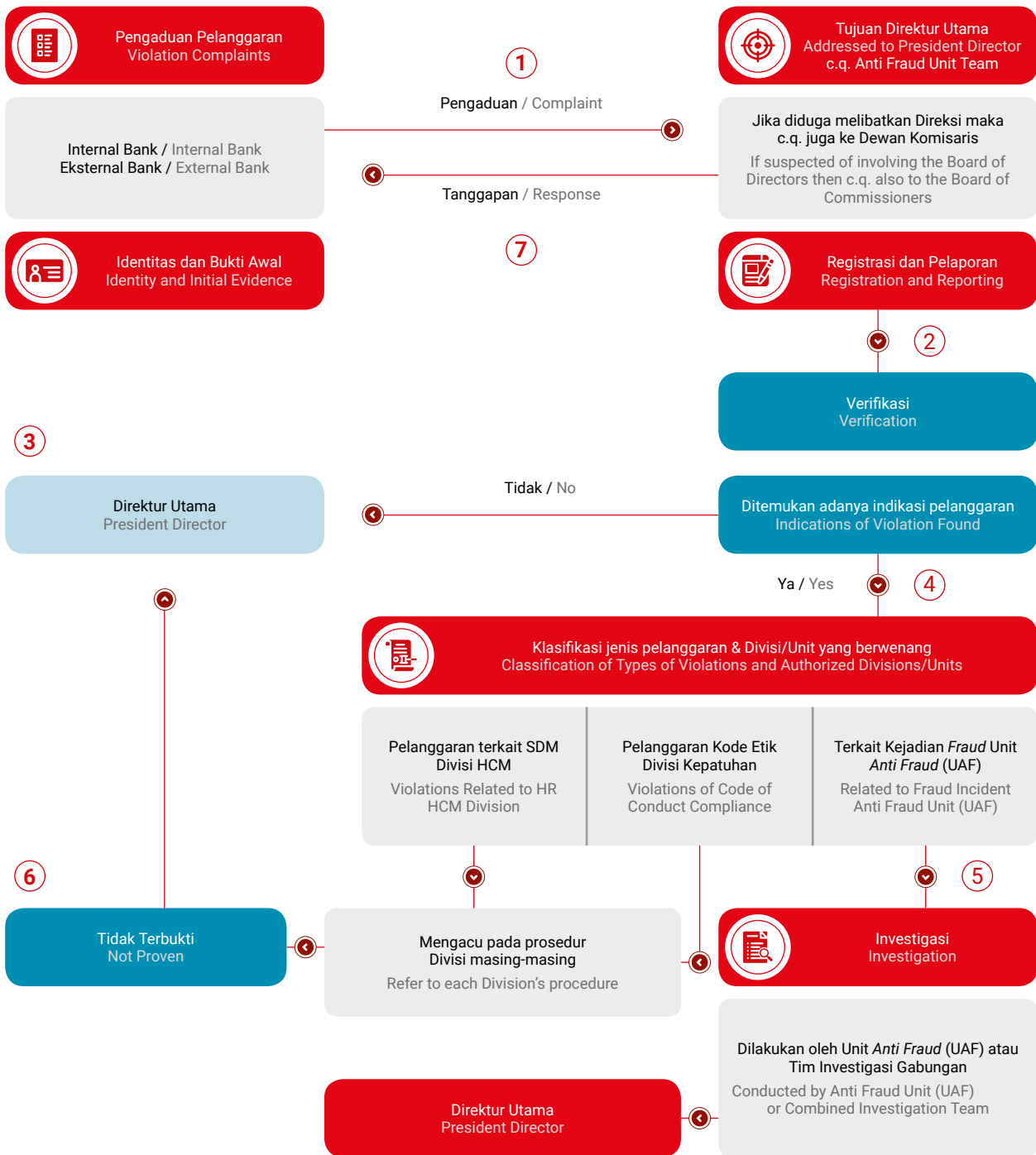
## Media and Parties Managing Violations

Bank Victoria applies whistleblowing media which comprises several methods.

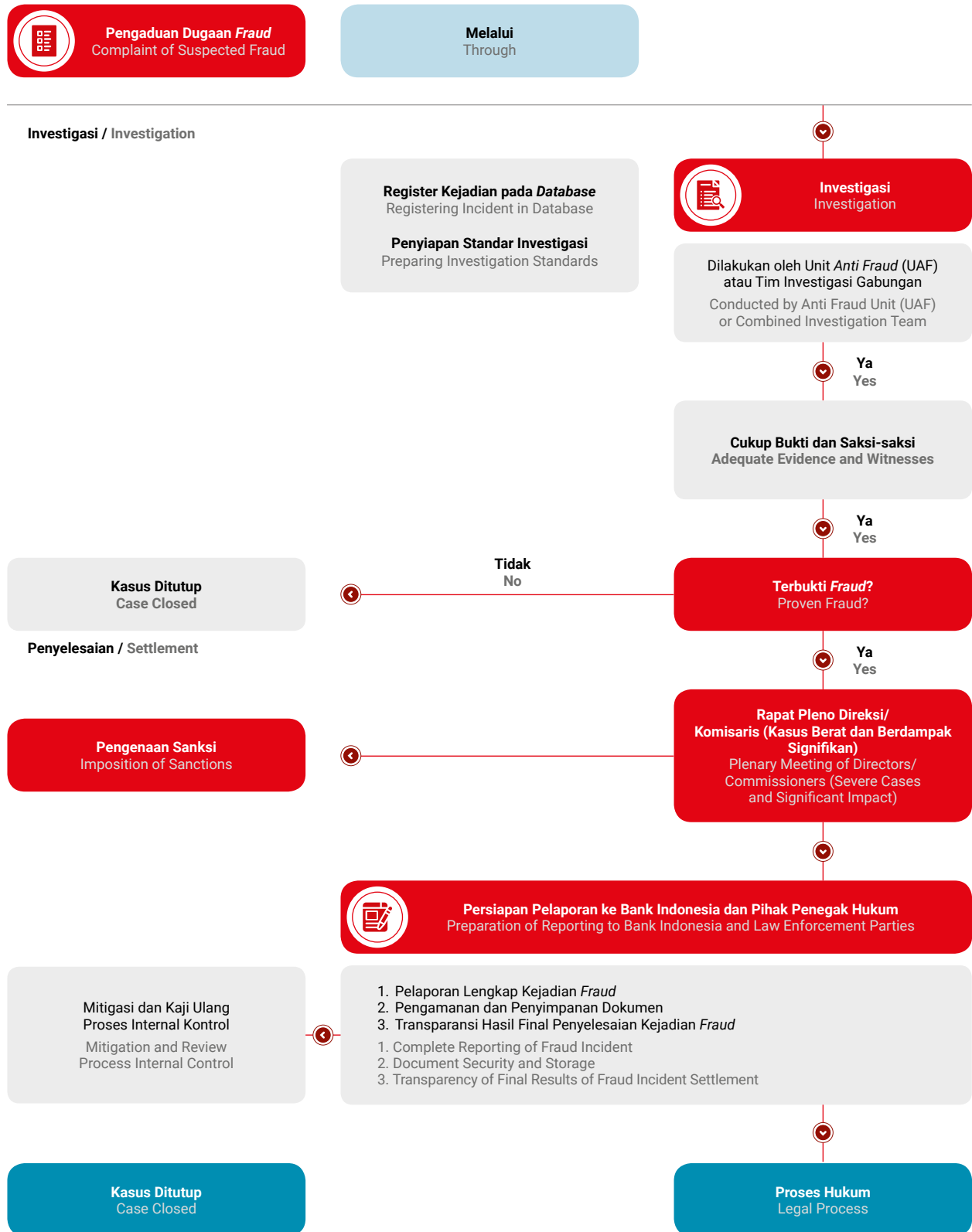
Pelaku Pelanggaran Violator	Media dan Pengelola Pelanggaran Media and Violation Handler
Karyawan Bank Bank Employees	<p>Penyampaian pengaduan pelanggaran ditujukan kepada Tim <i>Anti Fraud</i>. Laporan pelanggaran dapat dilakukan secara lisan, melalui surat, <i>e-mail</i>, atau sms kepada Tim <i>Anti Fraud</i> pada alamat:</p> <p>a. Surat : Kepada Direktur Utama dan ditembuskan kepada Unit <i>Anti Fraud</i> di Graha BIP Lt. 10, Jl. Gatot Subroto Kav.23, RT002RW002, Kel. Karet Semanggi, Kec. Setiabudi, Jakarta Selatan, 12930.</p> <p>b. <i>E-mail</i> : <a href="mailto:unitantifraud@victoriabank.co.id">unitantifraud@victoriabank.co.id</a></p> <p>c. SMS/<i>Handphone</i> : 08118707649.</p> <p>Whistleblowing report is addressed to the Anti-Fraud Team. Whistleblowing reporting can be done verbally, by mail, email, or SMS to Anti-Fraud Team at the address:</p> <p>a. Letter : To the President Director with a copy to the Anti-Fraud Unit at Graha BIP Lt. 10, Jl. Gatot Subroto Kav. 23, RT 002 RW 002, Kel. Karet Semanggi, Kec. Setiabudi, Jakarta Selatan, 12930.</p> <p>b. Email : <a href="mailto:unitantifraud@victoriabank.co.id">unitantifraud@victoriabank.co.id</a></p> <p>c. SMS/Mobile phone : 08118707649.</p>
Anggota Dewan Komisaris atau keluarganya Members of the Board of Commissioners or their families	<p>Penyampaian pengaduan pelanggaran ditujukan kepada Dewan Komisaris dengan alamat <i>e-mail</i> <a href="mailto:unitantifraudkomisaris@victoriabank.co.id">unitantifraudkomisaris@victoriabank.co.id</a>.</p> <p>Whistleblowing report is addressed to the Board of Commissioners at the email address of <a href="mailto:unitantifraudkomisaris@victoriabank.co.id">unitantifraudkomisaris@victoriabank.co.id</a>.</p>
Anggota Direksi atau keluarganya Members of the Board of Directors or their families	<p>Penyampaian pengaduan pelanggaran ditujukan kepada Direktur Utama dengan alamat <i>e-mail</i> <a href="mailto:unitantifrauddireksi@victoriabank.co.id">unitantifrauddireksi@victoriabank.co.id</a>.</p> <p>Whistleblowing report is addressed to the President Director at the email address of <a href="mailto:unitantifrauddireksi@victoriabank.co.id">unitantifrauddireksi@victoriabank.co.id</a>.</p>
Anggota Tim <i>Anti Fraud</i> Members of Anti-Fraud Team	<p>Penyampaian pengaduan pelanggaran ditujukan langsung kepada Direktur Utama.</p> <p>Whistleblowing report is addressed directly to the President Director.</p>

## Mekanisme Pengelolaan Pelaporan Pelanggaran

## Mechanism of Whistleblowing Management



**Skema Penyelesaian Fraud**  
**Fraud Settlement Scheme**



## Perlindungan bagi Pelapor

Untuk memudahkan Tim *Anti Fraud* dalam menindaklanjuti dan mendapatkan klarifikasi terkait pelaporan pelanggaran yang terjadi, Manajemen Bank Victoria sangat menyarankan agar identitas pelapor dicantumkan. Hal tersebut dilakukan guna memudahkan kelancaran investigasi. Meskipun demikian, kerahasiaan identitas pelapor akan tetap dijaga oleh Tim *Anti Fraud* serta dijamin oleh Dewan Komisaris dan Direksi. Adapun informasi minimum pelapor meliputi alamat surat atau *e-mail* atau nomor telepon atau nomor telepon genggam.

Tim *Anti Fraud* melaksanakan jaminan perlindungan terhadap pelapor sesuai dengan mekanisme yang berlaku dengan bentuk jaminan perlindungan yang diberikan Bank kepada pihak pelapor sebagai berikut.

1. Penyediaan saluran komunikasi pelaporan (lisan, telepon, *e-mail*) yang bersifat rahasia dan dapat dipilih dengan bebas oleh pelapor ataupun penyediaan *Ombudsman* yang independen dan rahasia. Melalui saluran komunikasi ini, pelapor akan mendapatkan informasi tindak lanjut atas penanganan laporan dugaan pelanggaran yang disampaikan.
2. Jaminan atas kerahasiaan identitas pelapor, terkecuali bila terdapat tuntutan hukum yang mengharuskan identitas pelapor dibuka di hadapan hakim.
3. Apabila pelapor merasa terancam setelah melaporkan adanya tindakan pelanggaran, maka dalam hal ini, Bank berkewajiban untuk melakukan perlindungan yang meliputi:
  - a. Perlindungan fisik, baik terhadap dirinya sendiri maupun keluarganya;
  - b. Perlindungan terhadap harta benda miliknya dan milik keluarganya atas teror ataupun pembalasan yang harus dialaminya;
  - c. Perlindungan administratif yang berupa penundaan kenaikan pangkat, pemecatan, pengucilan di tempat kerja, mutasi yang tidak layak, termasuk kepastian kerja dan lainnya; serta
  - d. Perlindungan hukum dalam proses litigasi di Pengadilan Negeri, termasuk biayanya, dan bila perlu termasuk perlindungan melalui Lembaga Perlindungan Saksi dan Korban (LPSK).

## Penanganan Pengaduan

Setiap laporan pengaduan yang masuk akan diterima dan ditampung untuk dilakukan penyaringan terhadap laporan pengaduan tersebut. Penerima laporan akan menindaklanjuti laporan apabila telah diyakini keakuratannya serta akan diabaikan dan disisihkan sebagai laporan yang tidak perlu ditindaklanjuti jika laporan tidak diyakini keakuratannya. Bank tidak akan memberikan sanksi kepada pelapor apabila laporannya tidak terbukti setelah melalui penyelidikan yang dilakukan oleh Tim *Anti Fraud*.

## Protection for Whistleblower

In order to facilitate the Anti-Fraud Team in following up and obtaining clarification regarding the violation, Bank Victoria's management strongly recommends that whistleblower includes his/her identity in the report. This is intended for the smooth investigation of the report. Nevertheless, the whistleblower's identity will remain confidential by the Anti Fraud Team, which is guaranteed by the Board of Commissioners and Board of Directors. Information regarding the whistleblower must at least contain email address or phone number or mobile phone number.

The Anti Fraud Team implements protection for the whistleblower according to the applicable mechanism in the form of protection guarantee by the Bank to the whistleblower among others:

1. The availability of reporting communication channel (verbal, telephone, e-mail), which is confidential and can be freely chosen by the whistleblower or the provision of independent and confidential Ombudsman. Through these communication channels, the whistleblower will obtain information on the follow-up actions taken on the alleged violation report submitted.
2. Guarantee for the anonymity of the Whistleblower, unless required by law proceeding that the identity of the whistleblower must be disclosed before a judge.
3. If the whistleblower feels threatened after reporting a violation, then in this case the Bank is obligated to protect the whistleblower which includes:
  - a. Physical protection, both for the whistleblower and for the family members;
  - b. Protection for the whistleblower's properties and family members' properties against terror or any retaliation the whistleblower is dealing with;
  - c. Administrative protection in the form of suspension of promotion, termination, expulsion at work, unreasonable transfer, including work assurance etc.; and
  - d. Legal protection in the litigation process in the District Court, including the fee and if necessary, including protection through Witness and Victim Protection Agency (LPSK).

## Complaint Handling

Any incoming complaint will be accepted and accommodated to be screened. The complaint will be followed-up if deemed accurate and will be ignored and set aside as a report that does need to be followed-up if deemed inaccurate. The Bank will not impose any sanction to whistleblower of a report that is not proven after an investigation is carried out by the Anti Fraud Team.

Tim *Anti Fraud* juga akan tetap menerima laporan anonim. Namun hal tersebut tidak disarankan karena akan mempersulit komunikasi dengan pelapor dalam tindak lanjut dugaan pelanggaran tersebut. Laporan anonim yang diterima akan diseleksi dan ditindaklanjuti berdasarkan pertimbangan:

1. Tingkat potensi risiko dugaan pelanggaran yang dilaporkan;
2. Kredibilitas dan integritas dari substansi laporan dugaan pelanggaran; serta
3. Kemungkinan untuk memperoleh klarifikasi atau melaksanakan tindak lanjut dari terjadinya dugaan pelanggaran dari sumber-sumber lain.

## Laporan Pelanggaran Tahun 2021

Pada tahun 2021, Bank Victoria tidak menerima laporan pelanggaran yang masuk melalui Tim *Anti Fraud*. Laporan pelanggaran yang diterima Tim *Anti Fraud* dalam 2 (dua) tahun terakhir sebagai berikut.

Internal Fraud	Total Pelanggaran yang Dilakukan oleh Total Violations Conducted by						Total	
	Dewan Komisaris dan Direksi Board of Commissioners and Board of Directors		Karyawan Tetap Permanent Employees		Karyawan Tidak Tetap dan Tenaga Kerja Alih Daya Non-Permanent Employees and Outsourced Employees			
	2021	2020	2021	2020	2021	2020	2021	2020
Total Fraud	-	-	-	7	-	1	-	8
Telah Diselesaikan Settled	-	-	-	7	-	1	-	8
Surat Peringatan Warning Letter	-	-	-	5	-	-	-	5
Skors Suspension	-	-	-	-	-	-	-	-
Pemutusan Hubungan Kerja Termination of Employment	-	-	-	2	-	1	-	3
Dalam Penyelesaian Internal Bank Under the Bank's Internal Settlement	-	-	-	-	-	-	-	-
Belum Diupayakan Penyelesaiannya Settlement has not been Sought	-	-	-	-	-	-	-	-
Telah Ditindaklanjuti melalui Proses Hukum Has been Followed-up through Legal Process	-	-	-	2	-	-	-	2

## Sanksi dan Tindak Lanjut atas Pengaduan Tahun 2021

Pada tahun 2021, tidak terdapat pelanggaran yang diterima oleh Dewan Komisaris dan Direksi, karyawan tetap, serta karyawan tidak tetap dan tenaga kerja alih daya, sehingga tidak terdapat sanksi bagi pihak/pelaku yang terbukti melakukan pelanggaran.

The Anti Fraud Team also receives anonymous report. However, this is not recommended as it would complicate the communication with the whistleblower in following up the alleged violation. Anonymous report received will be selected and acted upon based on the following considerations:

1. The potential risk level of reported alleged violations;
2. The credibility and integrity of the substance of the allegedly infringing report; and
3. Possibility to clarify or follow-up of the alleged whistleblowing from other sources.

## Whistleblowing Report in 2021

In 2021, Bank Victoria did not receive any whistleblowing reports submitted to the Anti Fraud Team. Whistleblowing reports received by the Anti Fraud Team in the last 2 (two) years are as follows.

## Sanctions and Follow-Up on Complaints in 2021

In 2021, there were no whistleblowing received by the Board of Commissioners and Board of Directors, permanent employees, as well as non-permanent employees and outsourced workers, and therefore, there were no sanctions for parties/actors proven to have committed violations.



## Akses Informasi dan Data Perusahaan Access to Company's Information and Data

Bank telah menggunakan beragam perangkat dalam upaya memberikan informasi yang transparan kepada publik dan pemangku kepentingan berkaitan dengan perkembangan dan pelaksanaan pengelolaan usaha Bank serta untuk menjalankan program komunikasi pemasaran. Bank juga menyediakan akses informasi bagi Pemegang Saham dan pemangku kepentingan untuk mendapatkan informasi lebih lanjut mengenai Bank melalui:

The Bank uses various devices in its efforts to provide transparent information to the public and stakeholders, with relation to the development and implementation of the Bank's business management and in carrying out marketing communication program. The Bank also provides information access for Shareholders and stakeholders to obtain further information regarding the Bank through:

**CAPRIE ARDIRA AZHAR**  
Corporate Secretary



**Gedung Graha BIP Lt. 10**  
Graha BIP Building 10<sup>th</sup> Floor  
Jl. Gatot Subroto Kav. 23  
Jakarta Selatan, 12930



(021) 522 8888



(021) 522 8777



corsec@victoriabank.co.id



www.victoriabank.co.id

### Situs Web

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 8/POJK.04/2015 tentang Situs Web Emiten atau Perusahaan Publik, maka Bank Victoria telah melengkapi situs web perusahaan dengan beberapa informasi penting (dalam Bahasa Indonesia dan Bahasa Inggris), seperti informasi mengenai Pemegang Saham, struktur grup Bank, analisis kinerja keuangan, laporan keuangan 5 (lima) tahun terakhir, Laporan Tahunan, profil Dewan Komisaris dan Direksi, penerapan tata kelola, serta informasi lainnya yang dianggap perlu dipublikasikan, khususnya untuk kepentingan pemangku kepentingan. Situs web Bank juga menyediakan saluran informasi terkait Bank Victoria, meliputi:

### Website

Based on Financial Services Authority Regulation No. 8/POJK.04/2015 on Website of Issuers and Public Companies, Bank Victoria has completed the Company's website with important information (in Indonesian and English), such as information regarding Shareholders, Bank Group's Structure, financial performance analysis, financial statements for the last 5 (five) years, Annual Report, profile of the Board of Commissioners and Board of Directors, corporate governance implementation, and any other information deemed necessary to be published, particularly for the interest of stakeholders. The Bank's website also provides information channel related to Bank Victoria which includes:



1500977



costumercare@victoriabank.co.id

### Media sosial / Social Media



@BankVictoriaID



Bank Victoria



@bankvictoria

## Media Elektronik

Bank menggunakan media elektronik seperti situs dan *e-mail* ([corsec@victoriabank.co.id](mailto:corsec@victoriabank.co.id)) untuk menyampaikan informasi yang relevan, termasuk Laporan Tahunan. Pemangku kepentingan dapat mengirimkan pesan melalui *e-mail* dengan mendaftarkan identitas serta alamat *e-mailnya* pada *mailing list* melalui situs Bank ([www.victoria.co.id](http://www.victoria.co.id)) jika ingin mendapatkan informasi Bank secara berkala.

## Siaran Pers

Salah satu bentuk penyebarluasan informasi Bank kepada publik yaitu dengan melakukan siaran pers. Siaran pers yang telah dilakukan bertujuan untuk menggambarkan kegiatan atau peristiwa yang terjadi. Selama tahun 2021, siaran pers yang telah dilakukan Bank, antara lain:

Tanggal Date	Siaran Pers Press Release
5 Februari 2021 5 February 2021	Indonesia GCG Award
25 Maret 2021 25 March 2021	15 Years Appreciation Customer Loyalty Award 2021
9 April 2021	Innovation Business Award 2021
9 April 2021	Indonesia Enterprises Risk Management
7 Mei 2021 7 May 2021	CSR Bank Victoria Santunan Ramadhan 1442 H Bank Victoria's CSR for 1442 H Ramadhan Fund Assistance
11 Juni 2021 11 June 2021	Corporate Secretary and Corporate Communication Award
5 Oktober 2021 5 October 2021	HUT Bank Victoria yang ke-27 Tahun Bank Victoria's 27th Anniversary
6 Oktober 2021 6 October 2021	CEO Message
29 Oktober 2021 29 October 2021	CSR Pendidikan Bank Victoria 2 Sekolah Bank Victoria's CSR for Education for 2 Schools
19 November 2021	Indonesia Finance Award IV 2021
6 Desember 2021 6 December 2021	Jam Layanan Operasional Kantor Cabang Bank Victoria Bank Victoria's Branch Offices Operational Service Hours
23 Desember 2021 23 December 2021	The Best Indonesia Leade II 2021
23 Desember 2021 23 December 2021	Jadwal Operasional Terbatas Bank Victoria Natal 2021 dan Tahun Baru 2022 Bank Victoria's Limited Operational Schedule for 2021 Christmas and 2022 New Year

## Buletin

Guna mempermudah penyampaian informasi kepada para pemangku kepentingan, Bank mengeluarkan media berupa buletin yang dikenal dengan nama *Victoria News*. Berikut informasi yang telah disampaikan *Victoria News* selama tahun 2021.

Edisi Edition	Konten Buletin Content of the Bulletin
Deposito <i>Online Via Mobile Banking</i> / Online Deposit Via Mobile Banking	Maret 2021 March 2021
Direksi dan Dewan Komisaris & SEVP 2021 Board of Directors and Board of Commissioners & SEVP 2021	

## Electronic Media

The Bank uses electronic media such as website and email ([corsec@victoriabank.co.id](mailto:corsec@victoriabank.co.id)) to deliver relevant information, including Annual Reports. Stakeholders can send messages via email by registering their identity and email address on the mailing list via the Bank's website ([www.victoria.co.id](http://www.victoria.co.id)) if they would like to regularly receive the information regarding the Bank.

## Press Release

One of the forms in disseminating information regarding the Bank to the public is through press release. Press release is intended to illustrate activities or events. Throughout 2021, the Bank issued the following press release:

## Bulletin

To facilitate easy access to information for stakeholders, Bank Victoria has issued an information delivery media in the form of a bulletin known as *Victoria News*. In 2021, *Victoria News* provided the following information.

Edisi Edition	Konten Buletin Content of the Bulletin
<i>Interview Majalah Pajak / Tax Magazine Interview</i>	
<i>Public Expose Bank Victoria 2021 / Public Expose of Bank Victoria 2021</i>	
Lomba Foto & <i>Caption</i> HUT Bank Victoria Ke-27 / Bank Victoria's 27 <sup>th</sup> Anniversary Photo & <i>Caption</i> Contest	November 2021
CSR Bank Victoria - Sekolah Dasar Dewi Sartika dan Sekolah Dasar Laksa Bhakti / Bank Victoria CSR - Dewi Sartika Elementary School and Laksa Bhakti Elementary School	

## Transparansi Laporan Keuangan dan Non-Keuangan

Bank Victoria senantiasa mempraktikkan prinsip transparansi dalam menyampaikan laporan yang telah dibuat. Beberapa laporan tersebut terkait dengan Laporan Keuangan, laporan kinerja Bank, laporan atas hasil RUPS, dan laporan lain-lain yang disampaikan kepada regulator. Berikut laporan yang telah disampaikan oleh Bank Victoria sepanjang tahun 2021.

## Transparency of Financial Statements and Non-Financial Statements

The Bank always applies the principle of transparency in delivering reports. These reports are the financial statements, the Bank's performance reports, reports on the GMS resolutions, and other reports submitted to the regulators. In 2021, Bank Victoria submitted the following reports.

Uraian Description	Tanggal Pelaporan Reporting Date
<b>Laporan Registrasi Pemegang Saham</b> Shareholders Register Report	
001/CORSEC-EKS/01/21	5 Januari 2021 5 January 2021
001/CORSEC-EKS/02/21	8 Februari 2021 8 February 2021
001/CORSEC-INT/03/21	8 Maret 2021 8 March 2021
001/CORSEC-EKS/04/21	7 April 2021
002/CORSEC-EKS/05/21	7 Mei 2021 7 May 2021
001/CORSEC-EKS/06/21	8 Juni 2021 8 June 2021
001/CORSEC-EKS/07/21	5 Juli 2021 5 July 2021
001/CORSEC-EKS/08/21	5 Agustus 2021 5 August 2021
001/CORSEC-EKS/09/21	6 September 2021
002/CORSEC-EKS/10/21	6 Oktober 2021 6 October 2021
002/CORSEC-EKS/11/21	5 November 2021
001/CORSEC-EKS/12/21	3 Desember 2021 3 December 2021
<b>Laporan Pihak Terkait</b> Reports of Related Parties	
002/DIR-EKS/07/21	5 Juli 2021 5 July 2021
<b>Laporan Transaksi Afiliasi</b> Reports of Affiliated Parties	
004/DIR-EKS/01/21	7 Januari 2021 7 January 2021
011/DIR-EKS/02/21	2 Februari 2021 2 February 2021
044/DIR-EKS/02/21	17 Februari 2021 17 February 2021

Uraian Description	Tanggal Pelaporan Reporting Date
004/DIR-EKS/03/21	1 Maret 2021 1 March 2021
010/DIR-EKS/06/21	7 Juni 2021 7 June 2021
001/DIR-EKS/09/21	1 September 2021
002/DIR-EKS/09/21	1 Desember 2021 1 December 2021
001/DIR-EKS/12/21	1 Desember 2021 1 December 2021
096/DIR-EKS/12/21	16 Desember 2021 16 December 2021

## Implementasi Tata Kelola Perusahaan Terbuka Implementation of Corporate Governance of Public Company

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 21/POJK.04/2015 tentang Penerapan Pedoman Tata Kelola Perusahaan Terbuka dan Surat Edaran Otoritas Jasa Keuangan No. 32/SEOJK.04/2015 tentang Pedoman Tata Kelola Perusahaan Terbuka, Bank menerapkan 5 (lima) aspek, 8 (delapan) prinsip, serta 25 rekomendasi yang disampaikan oleh Otoritas Jasa Keuangan. Adapun uraian penerapannya dijelaskan sebagai berikut.

Based on Financial Services Regulation No. 21/POJK.04/2015 on Implementation of Integrated Governance for Public Companies and Financial Services Authority Circular No. 32/SEOJK.04/2015 on Guidelines of Governance for Public Companies, the Bank implements 5 (five) aspects and 8 (eight) principles, including 25 recommendations as issued by the Financial Services Authority. The following are explanations regarding the implementation.

### Aspek 1: Hubungan Perusahaan Terbuka dengan Pemegang Saham dalam Menjamin Hak-Hak Pemegang Saham Aspect 1: Relationship between the Public Company and Shareholders in Guaranteeing the Shareholders' Rights

#### Prinsip / Principle 1: Meningkatkan Nilai Penyelenggaraan RUPS. Increasing the Value of Convening General Meeting of Shareholders (GMS).

<b>Rekomendasi 1</b> Recommendation 1	<b>Perusahaan terbuka memiliki cara atau prosedur teknis pengumpulan suara (<i>voting</i>) baik secara terbuka maupun tertutup yang mengedepankan independensi, dan kepentingan Pemegang Saham.</b> Public Company has technical voting methods or procedures, either open or close, prioritizing independence, and interest of Shareholders.
Uraian Rekomendasi Description Recommendation	<ul style="list-style-type: none"> <li>• Setiap saham dengan hak suara yang dikeluarkan mempunyai 1 (satu) hak suara (<i>one share one vote</i>). Pemegang Saham dapat menggunakan hak suaranya pada saat pengambilan keputusan, terutama dalam pengambilan keputusan dengan cara <i>voting</i>. Namun demikian, mekanisme pengambilan keputusan dengan cara <i>voting</i>, baik secara terbuka maupun tertutup belum diatur secara rinci.</li> <li>• Perusahaan terbuka direkomendasikan mempunyai prosedur pengambilan suara dalam pengambilan keputusan atas suatu mata acara RUPS. Adapun prosedur <i>voting</i> tersebut harus menjaga independensi ataupun kebebasan Pemegang Saham. Sebagai contoh, dalam <i>voting</i> secara terbuka dilakukan dengan cara mengangkat tangan sesuai dengan instruksi pilihan yang ditawarkan oleh pimpinan RUPS. Sedangkan, dalam <i>voting</i> secara tertutup dilakukan pada keputusan yang membutuhkan kerahasiaan ataupun atas permintaan Pemegang Saham, dengan cara menggunakan kartu suara ataupun dengan penggunaan <i>electronic voting</i>.</li> <li>• Every issued share with voting rights has 1 (one) vote (one share one vote). Shareholders can use their votes during decision making, especially in decision making by voting. However, decision making mechanism by voting, either open or close, has not been regulated in details.</li> <li>• Public companies are recommended to have procedure of voting in decision making of one GMS agenda. The voting procedure must maintain the independence or freedom of the Shareholders. As an example, in open voting, it is done by raising hands following the instruction of selection offered by GMS Chair. Whereas in closed voting, it is done for decision that needs confidentiality or upon request by the Shareholders by using voting card or electronic voting.</li> </ul>
Status dan Realisasi Status and Realization	<p><b>Terpenuhi</b> Tata cara mengenai pengambilan suara telah diatur di dalam Anggaran Dasar Bank Pasal 14 tentang Keputusan, Kuorum, Kehadiran, Keputusan dalam RUPS dan Risalah RUPS. Dalam pelaksanaan setiap RUPS, mekanisme pengambilan suara merupakan bagian dari tata tertib rapat yang diinformasikan kepada para pemegang saham melalui pengumuman di situs web Bank dan dibacakan awal rapat.</p> <p><b>Complied</b> Procedure regarding voting is regulated in the Bank's Articles of Association Article 14 on Resolution, Quorum, Attendance, GMS Resolution and GMS Minutes. In each GMS implementation, the voting mechanism is part of the meeting procedure which will be informed to the shareholders in an announcement on the Bank's website and will be read out at the beginning of the meeting.</p>

<b>Rekomendasi 2</b> Recommendation 2	<b>Seluruh anggota Direksi dan anggota Dewan Komisaris Perusahaan Terbuka hadir dalam RUPS Tahunan.</b> All members of Board of Directors and members of Board of Commissioners of Public Company attend the Annual GMS.
Uraian Rekomendasi Description Recommendation	Kehadiran seluruh anggota Direksi dan anggota Dewan Komisaris perusahaan terbuka bertujuan agar setiap anggota Direksi dan anggota Dewan Komisaris dapat memperhatikan, menjelaskan dan menjawab secara langsung permasalahan yang terjadi atau pertanyaan yang diajukan oleh Pemegang Saham terkait mata acara dalam RUPS.  Attendance of all members of Board of Directors and members of Board of Commissioners of public company is intended so that each member of Directors and member of Board of Commissioners can notice, explain, and answer directly on every problem occurred or questioned asked by the Shareholders in regard of the items in GMS agenda.
Status dan Realisasi Status and Realization	<b>Penjelasan</b> Salah satu anggota Dewan Komisaris tidak dapat hadir pada penyelenggaraan RUPS Tahun Buku 2020 yang diselenggarakan pada 25 Juni 2021 karena sakit. Meskipun demikian, pelaksanaan fungsi Dewan Komisaris yang tidak hadir telah terwakilkan oleh Dewan Komisaris yang hadir. Sementara itu, seluruh anggota Dewan Komisaris dan Direksi hadir dalam RUPS Luar Biasa yang diselenggarakan pada 30 November 2021.  <b>Explanation</b> One of the Board of Commissioners' members was unable to attend the 2020 Fiscal Year GMS held on 25 June 2021 due to illness. Nevertheless, his function was represented by the Board of Commissioners' members who were present. Meanwhile, all members of the Board of Commissioners and Board of Directors attended the Extraordinary GMS held on 30 November 2021.
<b>Rekomendasi 3</b> Recommendation 3	<b>Ringkasan risalah RUPS tersedia dalam situs web Perusahaan Terbuka paling sedikit selama 1 (satu) tahun.</b> Summary of GMS Minutes is available on the Company's website for at least 1 (one) year.
Uraian Rekomendasi Description Recommendation	Perusahaan terbuka wajib membuat ringkasan risalah RUPS dalam Bahasa Indonesia dan bahasa asing (minimal dalam Bahasa Inggris), serta diumumkan 2 (dua) hari kerja setelah RUPS diselenggarakan kepada masyarakat, yang salah satunya melalui situs web perusahaan terbuka. Ketersediaan ringkasan risalah RUPS pada situs web perusahaan terbuka memberikan kesempatan bagi Pemegang Saham yang tidak hadir untuk mendapatkan informasi penting dalam penyelenggaraan RUPS secara mudah dan cepat. Oleh karena itu, ketentuan tentang jangka waktu minimal ketersediaan ringkasan risalah RUPS di situs web dimaksudkan untuk menyediakan kecukupan waktu bagi Pemegang Saham untuk memperoleh informasi tersebut.  Public Company must make a summary of the GMS minutes in Indonesian and foreign language (at least in English) and announce it in 2 (two) business days after the GMS is convened to public, in which one way is through the Company's website. The availability of summary of the GMS minutes on the public company's website gives opportunity to Shareholders who cannot attend to obtain important information in the GMS easily and fast. Therefore, provision on the minimum time period of availability of the summary of the GMS minutes on the website is intended to give adequate time for Shareholders to obtain the information.
Status dan Realisasi Status and Realization	<b>Terpenuhi</b> Pada 29 Juni 2021 situs web KSEI, situs web Bursa Efek Indonesia, dan situs web Bank telah memuat ringkasan risalah RUPS.  <b>Complied</b> On 29 June 2021, KSEI's website, Indonesia Stock Exchange's website, and the Bank's website published a summary of the GMS minutes.

**Prinsip / Principle 2:**

**Meningkatkan Kualitas Komunikasi Perusahaan Terbuka dengan Pemegang Saham atau Investor.**

**Increasing the Communication Quality of the Public Company and Shareholders or Investors.**

<b>Rekomendasi 4</b> Recommendation 4	<b>Perusahaan terbuka memiliki suatu kebijakan komunikasi dengan Pemegang Saham atau Investor.</b> Public company has communication policy with the Shareholders or Investors.
Uraian Rekomendasi Description Recommendation	<ul style="list-style-type: none"> <li>• Adanya komunikasi antara perusahaan terbuka dengan Pemegang Saham atau investor dimaksudkan agar para Pemegang Saham atau investor mendapatkan pemahaman lebih jelas atas informasi yang telah dipublikasikan kepada masyarakat, seperti laporan berkala, keterbukaan informasi, kondisi atau prospek bisnis dan kinerja, serta pelaksanaan tata kelola perusahaan terbuka. Di samping itu, Pemegang Saham atau investor juga dapat menyampaikan masukan dan opini kepada manajemen perusahaan terbuka.</li> <li>• Kebijakan komunikasi dengan para Pemegang Saham atau investor menunjukkan komitmen perusahaan terbuka dalam melaksanakan komunikasi dengan para Pemegang Saham atau investor. Dalam kebijakan tersebut mencakup strategi, program, dan waktu pelaksanaan komunikasi, serta panduan yang mendukung Pemegang Saham atau investor untuk berpartisipasi dalam komunikasi tersebut.</li> <li>• The communication between public company and Shareholders or investors is intended to enable the Shareholders or investors to gain clearer understanding of publicly available information, such as periodic reports, information disclosure, business or performance conditions and prospects, and the implementation of corporate governance. In addition, Shareholders or investors may also submit feedback and opinions to public company's management.</li> <li>• Communication policy with the Shareholders or investors indicates the commitment of public company in communicating with the Shareholders or investors. Such policies include strategies, programs, and timelines of communication, as well as guidelines that support the Shareholders or investors to participate in such communication.</li> </ul>

<b>Status dan Realisasi</b> Status and Realization	<b>Terpenuhi</b> Bank telah memiliki kebijakan mengenai komunikasi dengan Pemegang Saham atau investor yang diatur dalam Anggaran Dasar Bank terkait RUPS. Berdasarkan kebijakan tersebut, Sekretaris Perusahaan Bank mengungkapkan informasi-informasi yang relevan kepada Pemegang Saham dan menyediakan sarana komunikasi bagi Pemegang Saham untuk mengetahui secara langsung informasi tentang Bank. <b>Complied</b> The Bank already has a policy regarding communication with Shareholders or investors as regulated under the Bank's Articles of Association related to the GMS. Based on such policy, the Bank's Corporate Secretary discloses relevant information to the Shareholders and facilitates communication channel to the Shareholders in obtaining direct information regarding the Bank.
<b>Rekomendasi 5</b> Recommendation 5	<b>Perusahaan terbuka mengungkapkan kebijakan komunikasi perusahaan dengan Pemegang Saham atau investor dalam situs web.</b> <b>Public company discloses the communication policy of the company with Shareholders or investors on the website.</b>
<b>Uraian Rekomendasi</b> Description Recommendation	Pengungkapan kebijakan komunikasi merupakan bentuk transparansi atas komitmen perusahaan terbuka dalam memberikan kesetaraan kepada semua Pemegang Saham atau investor atas pelaksanaan komunikasi. Pengungkapan informasi tersebut juga bertujuan untuk meningkatkan partisipasi dan peran Pemegang Saham atau investor dalam pelaksanaan program komunikasi perusahaan terbuka. The disclosure of communication policy is a form of transparency of public company's commitment in giving equality to all Shareholders or investors for the implementation of communication. The disclosure of such information also aims to increase the participation and role of Shareholders or investors in the implementation of public company's communication program.
<b>Status dan Realisasi</b> Status and Realization	<b>Terpenuhi</b> Bank telah memiliki kebijakan komunikasi dalam rangka transparansi dan memberikan kesetaraan informasi kepada Pemegang Saham atau Investor yang dapat diakses pada situs resmi Bank <a href="http://www.victoriabank.co.id">www.victoriabank.co.id</a> bagian Hubungan Investor. <b>Complied</b> The Bank already has a policy regarding communication in order to be transparent and to provide information equality to Shareholders or Investors which can be accessed on the Bank's official website at <a href="http://www.victoriabank.co.id">www.victoriabank.co.id</a> in the Investor Relation section.

## Aspek 2: Fungsi dan Peran Dewan Komisaris

### Aspect 2: Functions and Roles of the Board of Commissioners

#### Prinsip / Principle 3:

#### Memperkuat Keanggotaan dan Komposisi Dewan Komisaris. Strengthening Membership and Composition of the Board of Commissioners.

<b>Rekomendasi 6</b> Recommendation 6	<b>Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi perusahaan terbuka.</b> <b>The determination of number of Board of Commissioners considers the condition of the public company.</b>
<b>Uraian Rekomendasi</b> Description Recommendation	Jumlah anggota Dewan Komisaris dapat memengaruhi efektivitas pelaksanaan tugas dari Dewan Komisaris. Penentuan jumlah anggota Dewan Komisaris perusahaan terbuka wajib mengacu kepada ketentuan peraturan perundang-undangan yang berlaku, yang paling kurang terdiri dari 2 (dua) orang berdasarkan ketentuan Peraturan Otoritas Jasa Keuangan tentang Dewan Komisaris dan Direksi Emiten atau Perusahaan Publik. Selain itu, perlu juga mempertimbangkan kondisi perusahaan terbuka, antara lain yang meliputi karakteristik, kapasitas, dan ukuran, serta pencapaian tujuan dan pemenuhan kebutuhan bisnis yang berbeda di antara perusahaan terbuka. Namun demikian, jumlah anggota Dewan Komisaris yang terlalu besar berpotensi mengganggu efektivitas pelaksanaan fungsi Dewan Komisaris. The number of Board of Commissioners' members may affect the effectiveness of Board of Commissioners' duty implementation. The determination of number of Board of Commissioners' members of a public company must refer to the provisions of applicable laws and regulations, which is at least 2 (two) members based on the provisions of Financial Services Authority Regulations on Board of Commissioners and Board of Directors of Issuers or Public Companies. Furthermore, it is also necessary to consider the conditions of public company including, among others, the characteristics, capacities, and measures, and the achievement of objectives and the fulfillment of different business needs among the public companies. However, large number of Board of Commissioners' members will potentially disrupt the effectiveness of implementation of Board of Commissioners' functions.
<b>Status dan Realisasi</b> Status and Realization	<b>Terpenuhi</b> Berdasarkan Anggaran Dasar Bank, <i>Board of Commissioners Charter (BOC Charter)</i> yang telah disahkan melalui Surat Keputusan Dewan Komisaris No. 001/SK-KOM/01/20 tanggal 10 Januari 2020, dan Peraturan Otoritas Jasa Keuangan tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik, Dewan Komisaris Bank beranggotakan 3 (tiga) orang dan 2 (dua) orang di antaranya merupakan Komisaris Independen. Jumlah tersebut dianggap telah sesuai dengan kompleksitas usaha Bank saat ini. <b>Complied</b> Based on the Bank's Articles of Association, the Board of Commissioners Charter (BOC Charter), which was approved under the Board of Commissioners' Decision Letter No. 001/SK-KOM/01/20 dated 10 January 2020, and the Financial Services Authority Regulation on Board of Directors and Board of Commissioners of Issuers or Public Companies, the Bank's Board of Commissioners consists of 3 (three) members and 2 (two) of them are Independent Commissioners. This number is considered to be fit to the Bank's current business complexity.

<b>Rekomendasi 7</b> Recommendation 7	<b>Penentuan komposisi anggota Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.</b> The determination of composition of the Board of Commissioners considers the range of expertise, knowledge, and experience required.
Uraian Rekomendasi Description Recommendation	Komposisi Dewan Komisaris merupakan kombinasi karakteristik, baik dari segi organ Dewan Komisaris maupun anggota Dewan Komisaris secara individu, sesuai dengan kebutuhan perusahaan terbuka. Karakteristik tersebut dapat tercermin dalam penentuan keahlian, pengetahuan, dan pengalaman yang dibutuhkan dalam pelaksanaan tugas pengawasan dan pemberian nasihat oleh Dewan Komisaris perusahaan terbuka. Komposisi yang telah memperhatikan kebutuhan perusahaan terbuka merupakan suatu hal yang positif, khususnya terkait pengambilan keputusan dalam rangka pelaksanaan fungsi pengawasan yang dilakukan dengan mempertimbangkan berbagai aspek yang lebih luas. The Board of Commissioners' composition is a combination of characteristics, either as organ of the Board of Commissioners or as a member of the Board of Commissioners individually, according to the public company's needs. These characteristics are reflected in the determination of expertise, knowledge, and experience required in implementing supervisory and advisory duties by the Board of Commissioners of a public company. A composition that pays attention to the public company needs is a positive matter, particularly related to the decision making in regard of implementing supervisory function that is conducted by considering various wider aspects.
Status dan Realisasi Status and Realization	<b>Terpenuhi</b> Komposisi anggota Dewan Komisaris telah memperhatikan keberagaman keahlian, pengetahuan dan pengalaman yang dibutuhkan oleh Bank. <b>Complied</b> The composition of members of Board of Commissioners was duly determined with due observance of diversity of expertise, knowledge, and experience required by the Bank.

**Prinsip / Principle 4:**

**Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris.**  
 Increasing the Quality of Implementation of Duties and Responsibilities of the Board of Commissioners.

<b>Rekomendasi 8</b> Recommendation 8	<b>Dewan Komisaris memiliki kebijakan penilaian sendiri untuk menilai kinerja Dewan Komisaris.</b> The Board of Commissioners has self assessment policy to assess the performance of the Board of Commissioners.
Uraian Rekomendasi Description Recommendation	<ul style="list-style-type: none"> <li>• Kebijakan penilaian sendiri Dewan Komisaris merupakan suatu pedoman yang digunakan sebagai bentuk akuntabilitas atas penilaian kinerja Dewan Komisaris secara kolegal. Penilaian sendiri dilakukan oleh masing-masing anggota untuk menilai pelaksanaan kinerja Dewan Komisaris secara kolegal, dan bukan menilai kinerja individual masing-masing anggota Dewan Komisaris. Dengan adanya penilaian sendiri ini diharapkan masing-masing anggota Dewan Komisaris dapat berkontribusi untuk memperbaiki kinerja Dewan Komisaris secara berkesinambungan.</li> <li>• Kebijakan tersebut dapat mencakup kegiatan penilaian yang dilakukan beserta maksud dan tujuan, waktu pelaksanaan yang secara berkala, dan tolok ukur atau kriteria penilaian yang digunakan sesuai dengan rekomendasi yang diberikan oleh fungsi nominasi dan remunerasi perusahaan terbuka, di mana adanya fungsi tersebut telah diwajibkan dalam Peraturan Otoritas Jasa Keuangan tentang Komite Nominasi dan Remunerasi Emiten atau Perusahaan Publik.</li> <li>• The Board of Commissioners' self-assessment policy is a guideline used as a form of accountability for the performance of the Board of Commissioners in a collegial manner. Self assessment is conducted by each member to assess the performance of the Board of Commissioners in a collegial manner, rather than assessing the individual performance of each member of the Board of Commissioners. With this self assessment, it is expected that each member of the Board of Commissioners can contribute to improve the performance of the Board of Commissioners on an ongoing basis.</li> <li>• The policy may include the assessment activities undertaken along with their purposes and objectives, time of execution that is periodical, and benchmarks or assessment criteria used in accordance with the recommendations given by the nomination and remuneration function of public company, in which the functions are required in the Financial Services Authority Regulation on the Nomination and Remuneration Committee of Issuers or Public Companies.</li> </ul>
Status dan Realisasi Status and Realization	<b>Terpenuhi</b> Kebijakan terkait penilaian sendiri Dewan Komisaris telah ditetapkan dalam BOC <i>Charter</i> terkait Evaluasi Kinerja Dewan Komisaris. <b>Complied</b> The policy related to Board of Commissioners' self-assessment is duly set out in the BOC Charter with relation to the Board of Commissioners' Performance Evaluation.
<b>Rekomendasi 9</b> Recommendation 9	<b>Kebijakan penilaian sendiri untuk menilai kinerja Dewan Komisaris, diungkapkan melalui Laporan Tahunan perusahaan terbuka.</b> Self assessment policy to assess the performance of the Board of Commissioners is disclosed through the public company Annual Report.
Uraian Rekomendasi Description Recommendation	Pengungkapan kebijakan penilaian sendiri atas kinerja Dewan Komisaris dilakukan tidak hanya untuk memenuhi aspek transparansi sebagai bentuk pertanggungjawaban atas pelaksanaan tugasnya, namun juga untuk memberikan keyakinan, khususnya kepada para Pemegang Saham atau investor atas upaya-upaya yang perlu dilakukan dalam meningkatkan kinerja Dewan Komisaris. Dengan adanya pengungkapan tersebut, Pemegang Saham atau investor mengetahui mekanisme <i>check and balance</i> terhadap kinerja Dewan Komisaris. The disclosure of self assessment policy on the performance of the Board of Commissioners is conducted not only to fulfill the transparency aspect as a form of responsibility for the performance of its duties, but also to provide confidence, especially to the Shareholders or investors on the efforts that need to be made to improve the performance of the Board of Commissioners. With such disclosure, the Shareholders or investors know the mechanism of check and balance on the performance of the Board of Commissioners.



<p>Status dan Realisasi Status and Realization</p>	<p><b>Terpenuhi</b> Laporan Tahunan Bank tahun 2021 telah memuat pelaksanaan penilaian sendiri Dewan Komisaris. Penilaian sendiri tersebut dilaksanakan secara konsisten setiap tahun berdasarkan BOC <i>Charter</i>.</p> <p><b>Complied</b> The Bank's 2021 Annual Report has contained the implementation of the Board of Commissioners' self-assessment. The self-assessment is consistently performed annually based on BOC Charter.</p>
<p>Rekomendasi 10 Recommendation 10</p>	<p><b>Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan.</b></p> <p>The Board of Commissioners has policies related to resignation of members of Board of Commissioners if involved in financial crime.</p>
<p>Uraian Rekomendasi Description Recommendation</p>	<ul style="list-style-type: none"> <li>• Kebijakan pengunduran diri anggota Dewan Komisaris yang terlibat dalam kejahatan keuangan merupakan kebijakan yang dapat meningkatkan kepercayaan para pemangku kepentingan terhadap perusahaan terbuka sehingga integritas perusahaan akan tetap terjaga. Kebijakan ini diperlukan untuk membantu kelancaran proses hukum dan agar proses hukum tersebut tidak mengganggu jalannya kegiatan usaha. Selain itu, dari sisi moralitas, kebijakan ini membangun budaya beretika di lingkungan perusahaan terbuka. Kebijakan tersebut dapat tercakup dalam pedoman ataupun kode etik yang berlaku bagi Dewan Komisaris.</li> <li>• Selanjutnya, yang dimaksud dengan terlibat dalam kejahatan keuangan merupakan adanya status terpidana terhadap anggota Dewan Komisaris dari pihak yang berwenang. Kejahatan keuangan dimaksud seperti manipulasi dan berbagai bentuk penggelapan dalam kegiatan jasa keuangan serta tindakan pidana pencucian uang sebagaimana dimaksud dalam Undang-Undang No. 8 Tahun 2010 tentang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang.</li> <li>• The resignation policy of the members of the Board of Commissioners involved in financial crime is a policy that can improve stakeholders' trust on public companies to maintain corporate integrity. This policy is required to assist in smooth legal process and to ensure that the legal process does not interfere with the business activities. In addition, in terms of morality, this policy establishes an ethical culture in public company environment. Such policies may be covered by guidelines or code of conduct applicable to the Board of Commissioners.</li> <li>• Furthermore, what is meant by engaging in financial crime is the status of the convicted against the member of the Board of Commissioners from the authorized party. The financial crimes in question include manipulation and various forms of embezzlement in financial services' activities and the money laundering as referred to in Law No. 8 of 2010 on the Prevention and Eradication of the Criminal Act of Money Laundering.</li> </ul>
<p>Status dan Realisasi Status and Realization</p>	<p><b>Terpenuhi</b> Dewan Komisaris Bank Victoria telah memiliki kebijakan terkait pengunduran diri apabila terlibat dalam kejahatan keuangan sebagaimana ditetapkan dalam BOC <i>Charter</i> terkait Keanggotaan Dewan Komisaris.</p> <p><b>Complied</b> Bank Victoria's Board of Commissioners already has a policy in place related to resignation in the event of being involved in a financial crime as set out in the BOC Charter related to the Board of Commissioners Membership.</p>
<p>Rekomendasi 11 Recommendation 11</p>	<p><b>Dewan Komisaris atau Komite yang menjalankan fungsi nominasi dan remunerasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi.</b></p> <p>The Board of Commissioners or Committees performing the nomination and remuneration functions prepare a succession policy to nominate members of Board of Directors.</p>
<p>Uraian Rekomendasi Description Recommendation</p>	<p>Berdasarkan ketentuan Peraturan Otoritas Jasa Keuangan tentang Komite Nominasi dan Remunerasi Emiten atau Perusahaan Publik, Komite yang menjalankan fungsi nominasi mempunyai tugas untuk menyusun kebijakan dan kriteria yang dibutuhkan dalam proses nominasi calon anggota Direksi. Salah satu kebijakan yang dapat mendukung proses nominasi sebagaimana dimaksud adalah kebijakan suksesi anggota Direksi. Kebijakan mengenai suksesi bertujuan untuk menjaga kesinambungan proses regenerasi atau kaderisasi kepemimpinan di perusahaan dalam rangka mempertahankan keberlanjutan bisnis dan tujuan jangka panjang perusahaan.</p> <p>Under the provisions of the Financial Services Authority Regulations on Nomination and Remuneration Committee of Issuers or Public Companies, the Committee in charge of nomination function has the duty to formulate policies and criteria required in the nomination process of candidates for the Board of Directors. One of the policies that can support the nomination process as referred to is the succession policy of Board of Directors' members. The succession policy is aimed to maintain the continuity of regeneration process or leadership cadre in the company in order to maintain the Company's business sustainability and long-term goals.</p>
<p>Status dan Realisasi Status and Realization</p>	<p><b>Terpenuhi</b> Komite Nominasi dan Remunerasi Bank telah mempunyai kebijakan suksesi dalam proses Nominasi anggota Direksi yang tertuang dalam Kebijakan Sistem Nominasi dan Remunerasi berdasarkan Surat Keputusan Dewan Komisaris No. 003/SK-KOM/09/18 tanggal 20 September 2018.</p> <p><b>Complied</b> The Bank's Nomination and Remuneration Committee already has a succession policy in the Nomination process for Board of Directors' members as stated in the Nomination and Remuneration System Policy based on the Board of Commissioners' Decision Letter No. 003/SK-KOM/09/18 dated 20 September 2018.</p>

**Aspek 3: Fungsi dan Peran Direksi**

**Aspect 3: Functions and Roles of the Board of Directors**

**Prinsip / Principle 5:**

**Memperkuat Keanggotaan dan Komposisi Direksi.**

**Strengthening Membership and Composition of the Board of Directors.**

<p><b>Rekomendasi 12</b> Recommendation 12</p>	<p><b>Penentuan jumlah anggota Direksi mempertimbangkan kondisi perusahaan terbuka serta efektivitas dalam pengambilan keputusan.</b> The determination of number of Board of Directors' members considers the Public Company's condition and the effectiveness of decision making.</p>
<p>Uraian Rekomendasi Description Recommendation</p>	<p>Sebagai organ perusahaan yang berwenang dalam pengurusan perusahaan, penentuan jumlah Direksi sangat memengaruhi jalannya kinerja perusahaan terbuka. Dengan demikian, penentuan jumlah anggota Direksi harus dilakukan melalui pertimbangan yang matang dan wajib mengacu pada ketentuan peraturan perundang-undangan yang berlaku, dimana berdasarkan Peraturan Otoritas Jasa Keuangan tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik paling sedikit terdiri dari 2 (dua) orang. Di samping itu, dalam penentuan jumlah Direksi harus berdasarkan pada kebutuhan untuk mencapai maksud dan tujuan perusahaan terbuka dan disesuaikan dengan kondisi perusahaan terbuka, meliputi karakteristik, kapasitas dan ukuran perusahaan terbuka serta bagaimana tercapainya efektivitas pengambilan keputusan Direksi.</p> <p>As the organ of the company authorized in company's management, the determination of number of Board of Directors' members greatly affects the performance of public company. Thus, the determination of number of Board of Directors' members must be made through careful consideration and must be subject to the provisions of applicable laws and regulations, which according to the Financial Services Authority Regulations on Board of Directors and Board of Commissioners of Issuers or Public Companies, must be composed of at least 2 (two) members. In addition, the determination of number of Board of Directors's members shall be based on the need to achieve the public company's goals and objectives and adjusted to the public company's condition, including the characteristics, capacity, and size of the public company and how the Board of Directors make effective decision making.</p>
<p>Status dan Realisasi Status and Realization</p>	<p><b>Terpenuhi</b> Berdasarkan Anggaran Dasar Bank, <i>Board of Directors Charter (BOD Charter)</i> yang telah disahkan melalui Surat Keputusan Direksi No. 002/SK-DIR/05/19 tanggal 2 Mei 2019, dan Peraturan Otoritas Jasa Keuangan tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik, Direksi Bank beranggotakan 5 (lima) orang. Jumlah tersebut dianggap telah sesuai dengan kompleksitas usaha Bank saat ini.</p> <p><b>Complied</b> Based on the Bank's Articles of Association, the Board of Directors Charter (BOD Charter), which was approved under the Board of Directors' Decision Letter No. 002/SK-DIR/05/19 dated 2 May 2019, and Financial Services Authority Regulation on Board of Directors and Board of Commissioners of Issuers or Public Companies, the Bank's Board of Directors consists of 5 (five) members. This number is considered to be fit to the Bank's current business complexity.</p>
<p><b>Rekomendasi 13</b> Recommendation 13</p>	<p><b>Penentuan komposisi anggota Direksi memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.</b> The determination of Board of Directors' composition considers range of expertise, knowledge, and experience required.</p>
<p>Uraian Rekomendasi Description Recommendation</p>	<p>Seperti halnya Dewan Komisaris, keberagaman komposisi anggota Direksi merupakan kombinasi karakteristik yang diinginkan, baik dari segi organ Direksi maupun anggota Direksi secara individu, sesuai dengan kebutuhan perusahaan terbuka. Kombinasi tersebut ditentukan dengan cara memperhatikan keahlian, pengetahuan dan pengalaman yang sesuai pada pembagian tugas dan fungsi jabatan Direksi dalam mencapai tujuan perusahaan terbuka. Dengan demikian, pertimbangan kombinasi karakteristik dimaksud akan berdampak dalam ketepatan proses pencalonan dan penunjukan individual anggota Direksi ataupun Direksi secara kolegal.</p> <p>Similar to the Board of Commissioners, the diversity of Board of Directors' composition is a combination of characteristics required, either Board of Directors as an organ or as a member of Board of Directors individually, according to the public company's needs. Such combination is determined by considering the expertise, knowledge, and experience in accordance with the division of duties and functions of Board of Directors in achieving the public company's objectives. Therefore, the consideration of such characteristics' combination will have an impact in the accuracy of nomination process and individual or collegial appointment of Board of Directors' members.</p>
<p>Status dan Realisasi Status and Realization</p>	<p><b>Terpenuhi</b> Komposisi anggota Direksi telah memperhatikan keberagaman keahlian, pengetahuan dan pengalaman yang dibutuhkan oleh Bank.</p> <p><b>Complied</b> Composition of members of Board of Directors was duly determined with due observance of the diversity of expertise, knowledge and experience required by the Bank.</p>

<b>Rekomendasi 14</b> Recommendation 14	<b>Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi.</b>
Uraian Rekomendasi Description Recommendation	<p><b>Members of the Board of Directors in charge of accounting or finance have expertise and/or knowledge in accounting.</b></p> <ul style="list-style-type: none"> <li>Laporan Keuangan merupakan laporan pertanggungjawaban manajemen atas pengelolaan sumber daya yang dimiliki oleh perusahaan terbuka, yang wajib disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan yang berlaku umum di Indonesia dan juga Peraturan Otoritas Jasa Keuangan terkait, antara lain peraturan perundang-undangan di sektor pasar modal yang mengatur mengenai penyajian dan pengungkapan Laporan Keuangan perusahaan terbuka. Berdasarkan peraturan perundang-undangan di sektor pasar modal yang mengatur mengenai tanggung jawab Direksi atas Laporan Keuangan, Direksi secara tanggung renteng bertanggung jawab atas Laporan Keuangan, yang ditandatangani Direktur Utama dan anggota Direksi yang membawahi bidang akuntansi atau keuangan.</li> <li>Pengungkapan dan penyusunan informasi keuangan yang disajikan dalam laporan keuangan akan sangat tergantung pada keahlian, dan/atau pengetahuan Direksi, khususnya anggota Direksi yang membawahi bidang akuntansi atau keuangan. Adanya kualifikasi keahlian dan/atau pengetahuan di bidang akuntansi yang setidaknya dimiliki anggota Direksi dimaksud dapat memberikan keyakinan atas penyusunan Laporan Keuangan, sehingga Laporan Keuangan tersebut dapat diandalkan oleh para pemangku kepentingan sebagai dasar pengambilan keputusan ekonomi terkait perusahaan terbuka yang dimaksud. Keahlian dan/atau pengetahuan tersebut dapat dibuktikan dengan latar belakang pendidikan, sertifikasi pelatihan dan/atau pengalaman kerja terkait.</li> <li>Financial Statements are the managements accountability reports on the management of resources owned by a public company, which must be prepared and presented in accordance with the generally accepted Financial Accounting Standards in Indonesia and the related Financial Services Authority Regulations, such as the laws and regulations in capital market sector governing the presentation and disclosure of Financial Statements of public company. Under the laws and regulations in capital market sector governing the Board of Directors' accountability in the Financial Statements, the Board of Directors is jointly and severally liable for the Financial Statements, which are signed by the President Director and member of Board of Directors in charge of accounting or finance sectors.</li> <li>The disclosure and preparation of financial information presented in the financial statements will largely depend on the Board of Directors' expertise and/or knowledge, especially the members of Board of Directors who are in charge of accounting or finance sectors. The qualification of expertise and/or knowledge in accounting sector, which shall at least be possessed by the Board of Directors' said members, can provide confidence in the preparation of Financial Statements, so that the Financial Statements can be relied upon by the stakeholders as the basis of economic decision making related to the said public company. Such expertise and/or knowledge may be proven by educational background, training certification, and/or related work experience.</li> </ul>
Status dan Realisasi Status and Realization	<p><b>Terpenuhi</b> Anggota Direksi yang membawahi bidang akuntansi atau keuangan, yaitu Debora Wahjutirto Tanoyo telah memiliki keahlian dan/atau pengetahuan di bidang akuntansi.</p> <p><b>Complied</b> Member of the Board of Directors in charge of accounting and finance, Ms. Debora Wahjutirto Tanoyo, possesses the appropriate expertise and/or knowledge in the accounting field.</p>

**Prinsip 6 / Principle :**  
**Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Direksi.**  
**Increasing the Quality of Implementation of Duties and Responsibilities of the Directors.**

<b>Rekomendasi 15</b> Recommendation 15	<b>Direksi mempunyai kebijakan penilaian sendiri untuk menilai kinerja Direksi.</b>
Uraian Rekomendasi Description Recommendation	<p><b>The Directors have self assessment policy to assess the Directors' performance.</b></p> <ul style="list-style-type: none"> <li>Seperti halnya pada Dewan Komisaris, kebijakan penilaian sendiri Direksi merupakan suatu pedoman yang digunakan sebagai bentuk akuntabilitas atas penilaian kinerja Direksi secara kolegal. Penilaian sendiri dilakukan oleh masing-masing anggota Direksi untuk menilai pelaksanaan kinerja Direksi secara kolegal, dan bukan menilai kinerja individual masing-masing anggota Direksi. Dengan adanya penilaian sendiri ini diharapkan masing-masing anggota Direksi dapat berkontribusi untuk memperbaiki kinerja Direksi secara berkesinambungan.</li> <li>Dalam kebijakan tersebut dapat mencakup kegiatan penilaian yang dilakukan beserta maksud dan tujuan, waktu pelaksanaan yang dilakukan secara berkala, dan tolok ukur atau kriteria penilaian digunakan sesuai dengan rekomendasi yang diberikan oleh fungsi nominasi dan remunerasi perusahaan terbuka, di mana pembentukan fungsi tersebut telah diwajibkan dalam Peraturan Otoritas Jasa Keuangan tentang Komite Nominasi dan Remunerasi Emiten atau Perusahaan Publik.</li> <li>Similar to the Board of Commissioners, the Directors' self-assessment policy is a guideline used as a form of accountability for Directors' performance collectively. Self assessment is performed by each member of the Directors to assess the Directors' performance collectively rather than assessing the individual performance of each member of the Directors. This self assessment is expected to improve the performance of the Directors on an ongoing basis.</li> <li>Such policy may include the assessment activities taken along with their purposes and objectives, periodically execution time, and benchmarks or assessment criteria used in accordance with the recommendations given by the nomination and remuneration function of the public company, in which the formation of such functions is required in the FSA Regulation on the Nomination and Remuneration Committee of Issuers or Public Companies.</li> </ul>
Status dan Realisasi Status and Realization	<p><b>Terpenuhi</b> Direksi Bank Victoria telah memiliki kebijakan terkait penilaian sendiri sebagaimana ditetapkan dalam BOD Charter terkait Evaluasi Kinerja Direksi.</p> <p><b>Complied</b> Bank Victoria's Board of Directors already has a policy regarding self-assessment as set out in the BOD Charter regarding Board of Directors' Performance Evaluation.</p>

<p><b>Rekomendasi 16</b> Recommendation 16</p>	<p><b>Kebijakan penilaian sendiri untuk menilai kinerja Direksi diungkapkan melalui Laporan Tahunan perusahaan terbuka.</b> Self assessment policy to assess the Board of Directors' performance is disclosed in the public company's Annual Report.</p>
<p>Uraian Rekomendasi Description Recommendation</p>	<p>Pengungkapan kebijakan penilaian sendiri atas kinerja Direksi dilakukan tidak hanya untuk memenuhi aspek transparansi sebagai bentuk pertanggungjawaban atas pelaksanaan tugasnya, namun juga untuk memberikan informasi penting atas upaya-upaya perbaikan dalam pengelolaan perusahaan terbuka. Informasi tersebut sangat bermanfaat untuk memberikan keyakinan kepada Pemegang Saham atau investor bahwa terdapat kepastian bahwa pengelolaan perusahaan terus dilakukan ke arah yang lebih baik. Dengan adanya pengungkapan tersebut, Pemegang Saham atau investor mengetahui mekanisme <i>check and balance</i> terhadap kinerja Direksi.</p> <p>The disclosure of the self assessment policy on Directors' performance is conducted not only to meet the transparency aspect as a form of accountability for the performance of their duties, but also to provide important information on the improvement of public company's management. Such information is very useful to give confidence to the Shareholders or investors that there company's management continues in better direction. With such disclosure, the Shareholders or investors may know the check and balance mechanism on the Directors' performance.</p>
<p>Status dan Realisasi Status and Realization</p>	<p><b>Terpenuhi</b> Berdasarkan BOD <i>Charter</i>, Direksi melaksanakan penilaian sendiri secara konsisten setiap tahun. Uraian terkait pelaksanaan penilaian sendiri Direksi telah disampaikan dalam Laporan Tahunan ini.</p> <p><b>Complied</b> Based on BOD Charter, the Board of Directors performs self-assessment consistently and annually. The explanation regarding the implementation of the Board of Directors' self-assessment is duly disclosed in this Annual Report.</p>
<p><b>Rekomendasi 17</b> Recommendation 17</p>	<p><b>Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan.</b> The Board of Directors has policies related to resignation of members of Board of Directors if involved in financial crime.</p>
<p>Uraian Rekomendasi Description Recommendation</p>	<ul style="list-style-type: none"> <li>• Kebijakan pengunduran diri anggota Direksi yang terlibat dalam kejahatan keuangan merupakan kebijakan yang dapat meningkatkan kepercayaan para pemangku kepentingan terhadap perusahaan terbuka, sehingga integritas perusahaan akan tetap terjaga. Kebijakan ini diperlukan untuk membantu kelancaran proses hukum dan agar tidak mengganggu jalannya kegiatan usaha. Dari sisi moralitas, kebijakan ini akan membangun budaya beretika di lingkungan perusahaan terbuka. Kebijakan tersebut dapat tercakup dalam pedoman ataupun kode etik yang berlaku bagi Direksi.</li> <li>• Selanjutnya, yang dimaksud dengan terlibat dalam kejahatan keuangan merupakan adanya status terpidana terhadap anggota Direksi dari pihak yang berwenang. Kejahatan keuangan dimaksud seperti manipulasi dan berbagai bentuk penggelapan dalam kegiatan jasa keuangan serta tindakan pidana pencucian uang sebagaimana dimaksud dalam Undang-Undang No. 8 Tahun 2010 tentang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang.</li> <li>• The resignation policy for Board of Directors' members involved in financial crime is a policy that may increase stakeholders' trust in public companies, and thus, maintain company's integrity. This policy is required to assist in smooth legal process and to ensure that the legal process does not interfere with the business activities. In terms of morality, this policy will build an ethical culture within the public company. Such policy may be covered in the guidelines or code of conduct applicable to the Board of Directors.</li> <li>• Furthermore, involved in financial crime constitutes the convicted status of the Board of Directors' member given by a competent authority. Such financial crimes include manipulation and various forms of embezzlement in financial services' activities and money laundering as referred to in Law No. 8 of 2010 on the Prevention and Eradication of the Criminal Act of Money Laundering.</li> </ul>
<p>Status dan Realisasi Status and Realization</p>	<p><b>Terpenuhi</b> Direksi Bank Victoria telah memiliki kebijakan terkait pengunduran diri apabila terlibat dalam kejahatan keuangan sebagaimana ditetapkan dalam BOD <i>Charter</i>.</p> <p><b>Complied</b> Bank Victoria's Board of Directors already has a policy for resignation in the event of being involved in financial crime as set out in the BOD Charter.</p>

**Aspek 4: Partisipasi Pemangku Kepentingan**  
**Aspect 4: Participation of Stakeholders**

**Prinsip / Principle 7:**

**Meningkatkan Aspek Tata Kelola Perusahaan melalui Partisipasi Pemangku Kepentingan.**  
**Increasing the Corporate Governance Aspect through Stakeholders Participation.**

<b>Rekomendasi 18</b> Recommendation 18	<b>Perusahaan terbuka memiliki kebijakan untuk mencegah terjadinya insider trading.</b> The Public Company has a policy to prevent the occurrence of insider trading.
Uraian Rekomendasi Description Recommendation	<p>Seseorang yang mempunyai informasi orang dalam dilarang melakukan suatu transaksi efek dengan menggunakan informasi orang dalam sebagaimana dimaksud dalam Undang-Undang mengenai Pasar Modal. Perusahaan terbuka dapat meminimalisir terjadinya <i>insider trading</i> tersebut melalui kebijakan pencegahan, misalnya dengan memisahkan secara tegas data dan/atau informasi yang bersifat rahasia dengan yang bersifat publik, serta membagi tugas dan tanggung jawab atas pengelolaan informasi di maksud secara proporsional dan efisien.</p> <p>A person having inside information is prohibited from engaging in a securities transaction by using the inside information as referred to in the Capital Market Law. Public company can minimize this insider trading through prevention policies, for example by strictly separating the confidential data and/or information from public ones, and dividing the duties and responsibilities for the management of such information in a proportionate and efficient manner.</p>
Status dan Realisasi Status and Realization	<p><b>Terpenuhi</b> Kebijakan untuk mencegah terjadinya <i>insider trading</i> telah diatur dalam <i>Code of Conduct</i> yang telah disahkan melalui Surat Keputusan Direksi No. 001/SK-DIR/01/21 tanggal 11 Januari 2021.</p> <p><b>Complied</b> Policy to prevent insider trading is stipulated in the Code of Conduct, which was validated under the Board of Directors' Decision Letter No. 001/SK-DIR/01/21 dated 11 January 2021.</p>
<b>Rekomendasi 19</b> Recommendation 19	<b>Perusahaan terbuka memiliki kebijakan anti korupsi dan anti fraud.</b> Public Company has anti-corruption and anti-fraud policies.
Uraian Rekomendasi Description Recommendation	<p>Kebijakan antikorupsi bermanfaat untuk memastikan agar kegiatan usaha perusahaan terbuka dilakukan secara legal, <i>prudent</i>, dan sesuai dengan prinsip-prinsip tata kelola yang baik. Kebijakan tersebut dapat merupakan bagian dalam Kode Etik, ataupun dalam bentuk tersendiri. Kebijakan tersebut antara lain dapat meliputi program dan prosedur yang dilakukan dalam mengatasi praktik korupsi, balas jasa (<i>kickbacks</i>), <i>fraud</i>, suap dan/atau gratifikasi dalam perusahaan terbuka. Lingkup dari kebijakan tersebut harus menggambarkan pencegahan perusahaan terbuka terhadap segala praktik korupsi, baik memberi atau menerima dari pihak lain.</p> <p>Anti-corruption policy is useful for ensuring that public company's business activities are conducted legally, prudently, and in accordance with the principles of good governance. This policy may be part of the Code of Conduct, or on a separate form. This policy may include programs and procedures taken in handling corrupt practices, kickbacks, fraud, bribery, and/or gratification in public company. The scope of policy must illustrate the prevention of public company against all corrupt practices, either giving to or receiving from other parties.</p>
Status dan Realisasi Status and Realization	<p><b>Terpenuhi</b> <i>Code of Conduct</i> Bank Victoria telah memuat kebijakan tentang anti korupsi dan anti <i>fraud</i>.</p> <p><b>Complied</b> Bank Victoria's Code of Conduct has contained policy regarding anti corruption and anti fraud.</p>
<b>Rekomendasi 20</b> Recommendation 20	<b>Perusahaan terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor.</b> Public company has a policy on selection and improvement of supplier or vendor capabilities.
Uraian Rekomendasi Description Recommendation	<ul style="list-style-type: none"> <li>• Kebijakan tentang seleksi pemasok atau vendor bermanfaat untuk memastikan agar perusahaan terbuka memperoleh barang atau jasa yang diperlukan dengan harga yang kompetitif dan kualitas yang baik. Sedangkan, kebijakan peningkatan kemampuan pemasok atau vendor bermanfaat untuk memastikan bahwa rantai pasokan (<i>supply chain</i>) berjalan dengan efisien dan efektif. Kemampuan pemasok atau vendor dalam memasok/memenuhi barang atau jasa yang dibutuhkan perusahaan akan memengaruhi kualitas hasil perusahaan.</li> <li>• Pelaksanaan kebijakan-kebijakan tersebut dapat menjamin kontinuitas pasokan, baik dari segi kuantitas maupun kualitas yang dibutuhkan perusahaan terbuka. Cakupan kebijakan ini meliputi kriteria dalam pemilihan pemasok atau vendor, mekanisme pengadaan yang transparan, upaya peningkatan kemampuan pemasok atau vendor, dan pemenuhan hak-hak yang berkaitan dengan pemasok atau vendor.</li> <li>• Policies on supplier or vendor selection are useful for ensuring that public companies obtain the goods or services needed at competitive prices and of good quality. Whereas, the policies on increasing suppliers' or vendors' capability are useful for ensuring that the supply chain runs efficiently and effectively. The capability of suppliers or vendors to supply/fulfill the goods or services needed by the company will affect the quality of the company's results.</li> <li>• The implementation of these policies can ensure supply continuity, in terms of both quantity and quality required by a public company. The policy scope includes criteria for selecting suppliers or vendors, transparent procurement mechanisms, efforts to increase capabilities of suppliers or vendors, and fulfillment of rights related to suppliers or vendors.</li> </ul>
Status dan Realisasi Status and Realization	<p><b>Terpenuhi</b> Kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor Bank diatur dalam Surat Keputusan Direksi No. 024/SK-DIR/04/13 tentang Kebijakan dan Prosedur <i>General Affair</i> PT Bank Victoria International Tbk yang telah diubah dengan Surat Keputusan Direktur No. 143/SK-DIR/06/14 tanggal 24 Juni 2014 tentang Penambahan dan Perubahan Kebijakan dan Prosedur <i>General Affairs</i> (GA).</p> <p><b>Complied</b> Policy on selection and improvement of capabilities of the Bank's suppliers or vendors is stipulated under the Board of Directors' Decision Letter No. 024/SK-DIR/04/13 on Policies and Procedures of General Affair of PT Bank Victoria International Tbk, which was amended under the Board of Directors' Decision Letter No. 143/SK-DIR/06/14 dated 24 June 2014 on Additions and Changes to General Affairs (GA) Policies and Procedures.</p>

<p><b>Rekomendasi 21</b> Recommendation 21</p>	<p><b>Perusahaan terbuka memiliki kebijakan tentang pemenuhan hak-hak kreditor.</b> Public company has a policy on the fulfillment of creditors' rights.</p>
<p>Uraian Rekomendasi Description Recommendation</p>	<p>Kebijakan tentang pemenuhan hak-hak kreditor digunakan sebagai pedoman dalam melakukan pinjaman kepada kreditor. Tujuan dari kebijakan di maksud adalah untuk menjaga terpenuhinya hak-hak dan menjaga kepercayaan kreditor terhadap perusahaan terbuka. Dalam kebijakan tersebut mencakup pertimbangan dalam melakukan perjanjian, serta tindak lanjut dalam pemenuhan kewajiban perusahaan terbuka kepada kreditor.</p> <p>Policies on fulfillment of creditor rights are used as a guideline to provide lending to creditors. The purpose of the policy is to maintain the fulfillment of rights and maintain the creditor trust in the public company. The policy includes consideration in entering agreements, as well as follow-ups in fulfilling the public company's obligations to creditors.</p>
<p>Status dan Realisasi Status and Realization</p>	<p><b>Terpenuhi</b> Code of Conduct Bank Victoria telah memuat kebijakan tentang pemenuhan hak-hak kreditor.</p> <p><b>Complied</b> Bank Victoria's Code of Conduct has contained policy regarding fulfillment of creditor's rights.</p>
<p><b>Rekomendasi 22</b> Recommendation 22</p>	<p><b>Perusahaan terbuka memiliki kebijakan sistem whistleblowing.</b> Public Company has policy of whistleblowing system.</p>
<p>Uraian Rekomendasi Description Recommendation</p>	<p>Kebijakan sistem <i>whistleblowing</i> yang telah disusun dengan baik akan memberikan kepastian perlindungan kepada saksi atau pelapor atas suatu indikasi pelanggaran yang dilakukan karyawan atau manajemen perusahaan terbuka. Penerapan kebijakan sistem tersebut akan berdampak pada pembentukan budaya tata kelola perusahaan yang baik. Kebijakan sistem <i>whistleblowing</i> mencakup, antara lain jenis pelanggaran yang dapat dilaporkan melalui sistem <i>whistleblowing</i>, cara pengaduan, perlindungan dan jaminan kerahasiaan pelapor, penanganan pengaduan, pihak yang mengelola aduan, dan hasil penanganan dan tindak lanjut pengaduan.</p> <p>A well-structured whistleblowing system policy will provide assurance of protection to the witnesses or reporters for an indication of breach by an employee or public company's management. The implementation of such system policy will impact the establishment of good corporate governance culture. The whistleblowing system policy includes among others types of violations that can be reported through whistleblowing system, methods to file a complaint, safeguards and confidentiality of the complainant, complaint handling, party managing complaints, and the results of the handling and complaints follow-up.</p>
<p>Status dan Realisasi Status and Realization</p>	<p><b>Terpenuhi</b> Kebijakan dan Standar Operasional Prosedur Penerapan <i>Anti Fraud</i> serta Penerapan <i>Whistleblowing System</i> Bank telah dimutakhirkan melalui Surat Keputusan Direksi No. 002/SK-DIR/08/20 tanggal 7 Agustus 2020 tentang Kebijakan dan Standar Operasional Prosedur Penerapan Strategi <i>Anti Fraud</i> PT Bank Victoria International Tbk.</p> <p><b>Complied</b> Policies and Standard Operating Procedures for Implementation of Anti-Fraud and Whistleblowing System, which was updated under the Board of Directors' Decision Letter No. 002/SK-DIR/08/20 dated 7 August 2020 on Policies and Standard Operating Procedures for the Implementation of Anti-Fraud Strategy of PT Bank Victoria International Tbk.</p>
<p><b>Rekomendasi 23</b> Recommendation 23</p>	<p><b>Perusahaan terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan.</b> The public company has a policy of long-term incentive for Board of Directors and employees.</p>
<p>Uraian Rekomendasi Description Recommendation</p>	<ul style="list-style-type: none"> <li>• Insentif jangka panjang merupakan insentif yang menjadi dasar atas pencapaian kinerja jangka panjang. Rencana insentif jangka panjang mempunyai dasar pemikiran bahwa kinerja jangka panjang perusahaan tercermin oleh pertumbuhan nilai dari saham atau target-target jangka panjang perusahaan lainnya. Insentif jangka panjang bermanfaat dalam rangka menjaga loyalitas dan memberikan motivasi kepada Direksi dan karyawan untuk meningkatkan kinerja atau produktivitas yang akan berdampak pada peningkatan kinerja perusahaan dalam jangka panjang.</li> <li>• Adanya suatu kebijakan insentif jangka panjang merupakan komitmen nyata perusahaan terbuka untuk mendorong pelaksanaan pemberian insentif jangka panjang kepada Direksi dan karyawan dengan syarat, prosedur dan bentuk yang disesuaikan dengan tujuan jangka panjang perusahaan terbuka. Kebijakan dimaksud dapat mencakup, antara lain: maksud dan tujuan pemberian insentif jangka panjang, syarat dan prosedur dalam pemberian insentif, serta kondisi dan risiko yang harus diperhatikan oleh perusahaan terbuka dalam pemberian insentif. Kebijakan tersebut juga dapat tercakup dalam kebijakan remunerasi perusahaan terbuka yang ada.</li> <li>• Long-term incentives are incentives that become the basis for achieving long-term performance. Long-term incentive plans have the premise that the Company's long-term performance is reflected by the growth in stock value or other long-term targets of the Company. Long-term incentives are useful in order to maintain loyalty and provide motivation to the Board of Directors and employees to improve performance or productivity, which will have an impact on increasing Company performance in the long term.</li> <li>• Having a long-term incentive policy is a real commitment of a public company to encouraging provision of long-term incentives to the Board of Directors and employees with terms, procedures, and forms that are adapted to the long-term objectives of the public company. Such policy may include, among others: the purpose and objectives of providing long-term incentives, terms and procedures in providing incentives, as well as conditions and risks that must be considered by public companies in providing incentives. The policy may also be included in the existing public company remuneration policy.</li> </ul>
<p>Status dan Realisasi Status and Realization</p>	<p><b>Terpenuhi</b> Bank melaksanakan kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan Berdasarkan Surat Keputusan Direksi No. 014/SK-DIR/07/19 tanggal 30 Juli 2019 tentang Kebijakan dan Prosedur <i>Human Capital Management</i>, yang dimuat dan dilaporkan dalam catatan atas Laporan Keuangan terkait Liabilitas Imbalan Kerja yang dilampirkan dalam Laporan Tahunan ini.</p> <p><b>Complied</b> The Bank implements the policy of provision of long-term incentives to the Board of Directors and employees based on Board of Directors' Decision Letter No. 014/SK-DIR/07/19 dated 30 July 2019 on Policies and Procedures of Human Capital Management, which is set out and reported in the notes of Financial Statements related to Employees Benefit Obligation as enclosed to this Annual Report.</p>



**Aspek 5: Keterbukaan Informasi**  
Aspect 5: Disclosure of Information

**Prinsip / Principle 8:**  
**Meningkatkan Pelaksanaan Keterbukaan Informasi.**  
Increasing Implementation of Information Disclosure.

<p><b>Rekomendasi 24</b> Recommendation 24</p>	<p><b>Perusahaan terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs web sebagai media keterbukaan informasi.</b> The public company utilizes the use of information technology more broadly, in addition to the website, as a media of information disclosure.</p>
<p>Uraian Rekomendasi Description Recommendation</p>	<p>Penggunaan teknologi informasi dapat bermanfaat sebagai media keterbukaan informasi. Adapun keterbukaan informasi yang dilakukan tidak hanya keterbukaan informasi yang telah diatur dalam peraturan perundang-undangan, namun juga informasi lain terkait perusahaan terbuka yang dirasakan bermanfaat untuk diketahui Pemegang Saham atau investor. Dengan pemanfaatan teknologi informasi secara lebih luas, selain situs web, diharapkan perusahaan dapat meningkatkan efektivitas penyebaran informasi perusahaan. Meskipun demikian, pemanfaatan teknologi informasi yang dilakukan tetap memperhatikan manfaat dan biaya perusahaan.</p> <p>The use of information technology can be useful as a medium of information disclosure. The information disclosure is not only for information regulated in laws and regulations, but also for other information related to the public company deemed useful for the Shareholder or investors to know. By using information technology widely, in addition to the website, it is expected that the company can improve the effectiveness in disseminating company's information. Nevertheless, the use of information technology still pays attention to the company's benefits and costs.</p>
<p>Status dan Realisasi Status and Realization</p>	<p><b>Terpenuhi</b> Bank berupaya memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs web dan media internal sebagai media keterbukaan informasi seperti instagram, youtube, dan facebook.</p> <p><b>Complied</b> The Bank sought to use information technology extensively aside from the website and internal media as information transparency media, such as instagram, youtube, and facebook.</p>
<p><b>Rekomendasi 25</b> Recommendation 25</p>	<p><b>Laporan Tahunan perusahaan terbuka mengungkapkan pemilik manfaat akhir dalam kepemilikan saham perusahaan terbuka paling sedikit 5,00%, selain pengungkapan pemilik manfaat akhir dalam kepemilikan saham perusahaan terbuka melalui Pemegang Saham Utama dan Pengendali.</b> The public company's Annual Report discloses the ultimate beneficial owner of the public company's share ownership of at least 5.00%, in addition to the disclosure of the ultimate beneficial owner in the share ownership of public company through Main and Controlling Shareholders.</p>
<p>Uraian Rekomendasi Description Recommendation</p>	<p>Peraturan perundang-undangan di sektor pasar modal yang mengatur mengenai penyampaian laporan tahunan perusahaan terbuka telah mengatur kewajiban pengungkapan informasi mengenai Pemegang Saham yang memiliki 5,00% atau lebih saham perusahaan terbuka, serta kewajiban pengungkapan informasi mengenai Pemegang Saham Utama dan Pengendali perusahaan terbuka, baik langsung maupun tidak langsung, sampai dengan pemilik manfaat terakhir dalam kepemilikan saham tersebut. Pedoman tata kelola ini, merekomendasikan untuk mengungkapkan pemilik manfaat akhir atas kepemilikan saham perusahaan terbuka paling sedikit 5,00%, selain mengungkapkan pemilik manfaat akhir dari kepemilikan saham oleh Pemegang Saham Utama dan Pengendali.</p> <p>The laws and regulations in capital market sector governing the submission of company's annual report has specified the disclosure obligation of Shareholders having 5.00% of shares or more of public company, as well as the obligation to disclose information about the major shareholders and controllers of public company, whether directly or indirectly, to the last beneficial owner in the ownership of such shares. In the governance guidelines it is recommended to disclose the ultimate beneficial owner of the public company's share ownership of at least 5.00%, in addition to the disclosure of the ultimate beneficial owner of the share ownership by Main and Controlling Shareholders.</p>
<p>Status dan Realisasi Status and Realization</p>	<p><b>Terpenuhi</b> Bank telah mengungkapkan informasi mengenai kepemilikan saham Bank paling sedikit 5,00% serta Pemegang Saham Utama dan Pengendali pada Perusahaan di dalam Laporan Tahunan ini.</p> <p><b>Complied</b> The Bank has disclosed information regarding the Bank's shareholding which is at least 5.00% and the Main and Controlling Shareholders of the Company in this Annual Report.</p>



## Rencana Strategis Bank Bank's Strategic Plans

Dalam melakukan penetapan strategi, Bank Victoria selalu berpedoman pada rencana bisnis bank yang telah disusun. Dalam proses penyusunannya Rencana Bisnis Bank 2022-2024, Bank berpedoman pada Peraturan Otoritas Jasa Keuangan No. 05/POJK.03/2016 tentang Rencana Bisnis Bank, dengan memperhatikan faktor eksternal dan internal yang dapat mempengaruhi kelangsungan usaha Bank, prinsip kehati-hatian, penerapan manajemen risiko, dan asas perbankan yang sehat.

Pada tahun 2022, Rencana Bisnis Bank mengambil tema "*Innovation and Governance for Higher Level Convenience Banking*".

Pendekatan budaya tema tersebut dapat disampaikan sebagai berikut.

1. Inovasi produk dan layanan melalui pendekatan digital dengan proses yang lebih cepat guna memberikan kenyamanan, keamanan nasabah dan/atau calon nasabah. Di sisi lain, Bank dapat meningkatkan fungsi pengawasan dan upaya mitigasi risiko yang melekat pada layanan dan produk yang dipasarkan serta dapat meningkatkan *financial value Bank*.
2. Inovasi produk dan layanan yang diperkenalkan senantiasa memperhatikan prinsip-prinsip GCG dan manajemen risiko yang dapat memberikan nilai bagi pemangku kepentingan.

### Langkah-Langkah Strategis yang akan Ditempuh Bank

Atas arah kebijakan Bank di atas, maka Bank Victoria masih akan tetap fokus kepada langkah-langkah strategis sampai dengan 5 (lima) tahun kedepan yang mencakup 5 (lima) aspek besar sebagai berikut.

1. Mengembangkan produk dan layanan digital sebagai inovasi terkini serta mengoptimalkan peranan kantor pusat dan cabang dalam mendorong pertumbuhan bisnis yang pesat dan pengembangan *retail banking*.
2. Memperkuat *brand image* Bank Victoria serta aktif dalam pengembangan produk, jasa layanan, dan strategi pemasaran.
3. Menerapkan organisasi yang efektif, meningkatkan kapasitas penggunaan informasi dan teknologi digital untuk mendukung peningkatan produktivitas.
4. Meningkatkan operasional Bank yang efektif dan efisien serta tata kelola terjaga pada aspek operasional, perkreditan, serta kapasitas dari sistem TI dan infrastruktur.
5. Memperkuat penerapan dan pengelolaan kepatuhan, manajemen risiko, dan pengendalian internal di seluruh aspek operasional dan bisnis Bank.

Uraian lebih rinci terkait Rencana Bisnis Bank tahun 2022-2024 dapat dilihat pada Bab Analisis dan Pembahasan Manajemen dalam Laporan Tahunan ini.

In the process of preparing the Bank's Business Plan 2022-2024, the Bank refers to the Financial Services Authority Regulation No. 05/POJK.03/2016 on the Bank's Business Plan, by considering external and internal factors that may affect the Bank's business continuity, the principle of prudence, risk management implementation, and sound banking principles.

In 2022, the Bank's Business Plan takes the theme "*Innovation and Governance for Higher Level Convenience Banking*".

The cultural approach to the theme can be conveyed as follows.

1. Product and service innovation through a digital approach with a faster process to provide convenience, security for customers and/or potential customers. On the other hand, the Bank can improve its supervisory function and mitigate the risks inherent in the services and products marketed and can increase the Bank's financial value.
2. Product and service innovation introduced always pays attention to the GCG principles and risk management that can provide value to stakeholders.

### Strategic Measures to be Adopted by the Bank

Based on the above policy directions, Bank Victoria will still focus on strategic measures for the next 5 (five) years which will cover 5 (five) main aspects as follows.

1. Developing digital products and services as the latest innovations and optimizing the role of the head office and branch offices in encouraging rapid business growth and retail banking development.
2. Strengthening Bank Victoria's brand image and being active in product development, services, and marketing strategies.
3. Implementing effective organization, increasing the capacity to use information and digital technology to support increased productivity.
4. Improving effective and efficient Bank operations and maintaining good governance in aspects of operations, loan, and the capacity of IT system and infrastructure.
5. Strengthening implementation and management of compliance, risk management, and internal control in all of the Bank's operational aspects and business.

A detailed explanation regarding Bank Business Plan for 2022-2024 can be found in the Management Discussion and Analysis chapter in this Annual Report.

## Pembelian Kembali Saham dan/atau Obligasi Shares and/or Bonds Buy Back

Selama tahun 2021, Bank tidak melakukan pembelian kembali saham atau obligasi subordinasi.

Throughout 2021, the Bank did not buy back any shares or subordinated bonds.

## Penyediaan Dana kepada Pihak Terkait dan/atau Penyediaan Dana Besar Provision of Funds to Related Parties and/or Provision of Large Exposure

Bank menerapkan prinsip kehati-hatian dalam melakukan penyediaan dana kepada pihak terkait dan kepada debitur dalam jumlah besar. Prinsip kehati-hatian tersebut dilakukan dengan:

1. Meninjau ulang mekanisme pelaksanaan dilakukan sesuai dengan kebijakan internal;
2. Memenuhi ketentuan Bank Indonesia mengenai aspek Batas Maksimum Pemberian Kredit (BMPK); dan
3. Diputuskan Dewan Komisaris secara independen.

Pada tahun 2021, penyediaan dana kepada pihak terkait dan dana besar di Bank Victoria diungkapkan sebagai berikut.

The Bank implements the principle of prudence in providing fund to related party and to debtors with large exposure. The principle of prudence is applied by:

1. Reviewing the implementation mechanisms according to internal policies;
2. Complying to Bank Indonesia regulations on Legal Lending Limit (LLL) aspect; and
3. Decided by the Board of Commissioners independently.

In 2021, the provision of fund to related party and large exposure in Bank Victoria is as listed below.

Penyediaan Dana Provision of Fund	Debitur Debtor	Total (Juta Rupiah / Million Rupiah)
<b>Individu</b> Individual	<b>1,176</b>	<b>17,914,266</b>
Kepada Pihak Terkait To Related Parties	33	220,542
Kepada Pihak Tidak Terkait To Non-Related Parties	1,143	17,693,724
<b>Kelompok</b> Group	<b>57</b>	<b>6,855,580</b>
<b>Total</b>	<b>1,233</b>	<b>24,769,846</b>

## Transparansi Kondisi Keuangan dan Non-Keuangan Lainnya

### Transparency of Other Financial and Non-Financial Conditions

Bank Victoria telah memenuhi kewajiban transparansi dan publikasi kondisi keuangan dan non-keuangan sesuai ketentuan yang berlaku melalui penyampaian dan publikasi informasi di situs web Bank.

The Bank has fulfilled its obligation related to transparency and publication of the financial and non-financial condition according to the prevailing laws and through submission and publication of information on the Bank's website.

## Pernyataan dan Praktik Bad Corporate Governance

### Statement and Practices of Bad Corporate Governance

Bank Victoria menyatakan bahwa Bank dalam menjalankan kegiatan usaha telah menerapkan prinsip-prinsip GCG dan tidak melakukan praktik-praktik *Bad Corporate Governance* seperti yang ditunjukkan pada tabel berikut.

Bank Victoria declares that in carrying out business activities the Bank has implemented GCG principles and does not carry out Bad Corporate Governance practices as reflected in the below table.

Uraian Description	Praktik Practice
Adanya laporan sebagai Bank yang mencemari lingkungan. There is a report that the Bank pollutes the environment.	Nihil None
Perkara penting yang sedang dihadapi oleh Bank, anggota Direksi dan/atau anggota Dewan Komisaris yang sedang menjabat tidak diungkapkan dalam Laporan Tahunan. Significant cases currently faced by the Bank, members of Board of Directors, and/or members of Board of Commissioners are not disclosed in the Annual Report.	Nihil None
Ketidakpatuhan dalam pemenuhan kewajiban perpajakan. Non-compliance in fulfilling tax obligations.	Nihil None
Ketidaksesuaian penyajian Laporan Tahunan dan Laporan Keuangan dengan peraturan yang berlaku dan Standar Akuntansi Keuangan. Inconsistency of presentation of Annual Report and Financial Statements with the the applicable regulations and Financial Accounting Standards (SAK).	Nihil None
Kasus terkait buruh dan karyawan. Cases related to workers and employees.	Nihil None
Tidak terdapat pengungkapan segmen operasi. There were no disclosures on operational segment.	Nihil None
Terdapat ketidaksesuaian antara Laporan Tahunan <i>hardcopy</i> dengan Laporan Tahunan <i>softcopy</i> . Inconsistence between hard copy of Annual Report and soft copy of the Annual Report.	Nihil None





# Tanggung Jawab Sosial dan Lingkungan Perusahaan

Corporate Social and Environmental Responsibility



**Tanggung Jawab terkait Hak Asasi Manusia**  
Responsibilities related to Human Rights



**Tanggung Jawab terkait Operasi yang Adil**  
Responsibilities related to Fair Operation



**Tanggung Jawab terkait Lingkungan Hidup**  
Responsibilities related to the Environment



**Tata Kelola Organisasi**  
Organizational Governance



**Tanggung Jawab terkait Ketenagakerjaan, Kesehatan dan Keselamatan Kerja**  
Responsibilities related to Employment, Occupational Health and Safety



**Tanggung Jawab terkait Pengembangan Sosial dan Kemasyarakatan**  
Responsibilities related to Social and Community Development



**Tanggung Jawab terkait Nasabah**  
Responsibilities related to Customers





## Dasar Implementasi TJSL The Basis of CSER Implementation



Bagi Bank Victoria, tanggung jawab sosial dan lingkungan perusahaan (TJSL) merupakan komitmen Bank dalam mengembangkan ekonomi dan pembangunan yang berkelanjutan dengan senantiasa memperhatikan tanggung jawab dan keseimbangan aspek ekonomi, sosial, dan lingkungan. Bank Victoria sepenuhnya sadar bahwa keberhasilan dalam menjalankan kegiatan perbankan tidak hanya ditentukan oleh kinerja manajemen dan operasional yang baik, melainkan juga karena didukung oleh komunitas yang berada di lingkungannya. Komitmen tersebut sebagai wujud nyata Bank Victoria menjalankan prinsip *Good Corporate Citizen* yang mematuhi dan menjalankan peraturan perundang-undangan yang berlaku, di antaranya:

1. Undang-Undang No. 8 Tahun 1999 tentang Perlindungan Konsumen;
2. Undang-Undang No. 11 Tahun 2020 tentang Cipta Kerja;
3. Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas;
4. Peraturan Otoritas Jasa Keuangan No. 1/POJK.07/2013 tentang Perlindungan Konsumen Sektor Jasa Keuangan; serta
5. Peraturan Otoritas Jasa Keuangan No. 51/POJK.03/2017 tentang Implementasi Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik.

To Bank Victoria, Corporate Social and Environmental Responsibility (CSER) is the Bank's commitment in developing economy and sustainable development by consistently taking into account the responsibility and balance in economic, social and environment aspects. Bank Victoria fully understands that the success in running our banking activities does not solely dependent upon management performance and proper operation, but it also depends on the surrounding community's supports. Such commitment is the concrete manifestation of Bank Victoria's efforts in implementing Good Corporate Citizen principle that complies with and abides by the prevailing laws and regulations, among others:

1. Law No. 8 of 1999 on Consumer Protection;
2. Law No. 11 of 2020 on Job Creation;
3. Law No. 40 of 2007 on Limited Liability Company;
4. Financial Services Authority Regulation No. 1/POJK.07/2013 on Consumer Protection for Financial Services Sector; and
5. Financial Services Authority Regulation No. 51/POJK.03/2017 on Implementation of Sustainable Finances for Financial Services Institutions, Issuers, and Public Companies.



## Kebijakan TJSL CSER Policies

Kebijakan TJSL di Bank Victoria meliputi:

1. Bertanggung jawab terhadap dampak dari utusan dan kegiatan perusahaan pada masyarakat dan lingkungan melalui perilaku transparansi dan etis;
2. Berkontribusi terhadap pembangunan berkelanjutan, termasuk kesehatan dan kesejahteraan masyarakat;
3. Menghargai dan mempertimbangkan harapan pemangku kepentingan;
4. Patuh terhadap hukum yang berlaku dan konsisten dalam pemenuhan norma perilaku internasional; serta
5. Mendorong perilaku bertanggung jawab pada seluruh bagian organisasi.

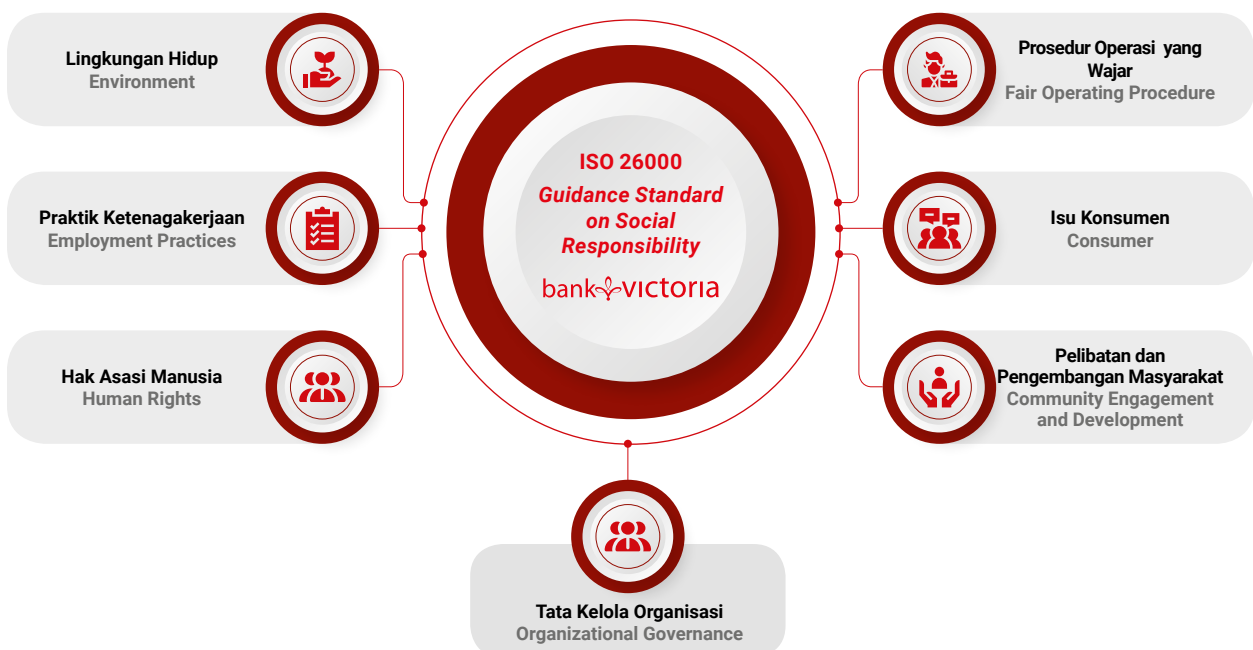
CSER Policies in Bank Victoria include:

1. Being accountable for the impact resulting from corporate decisions and activities on the community and environment through transparent and ethical conducts;
2. Contributing to sustainable development, including to community health and welfare;
3. Respecting and considering stakeholders' expectations;
4. Complying with the applicable laws and being consistent in adhering to international norms of behavior; and
5. Encouraging responsible behavior in all parts of the organization.

## Pendekatan Holistik Terintegrasi dalam Pelaksanaan TJSL Integrated Holistic Approach in CSER Implementation

Pelaksanaan program TJSL di Bank dilakukan dengan mengedepankan prinsip moral dan etis serta berpedoman pada ISO 26000 tentang *Guidance Standard on Social Responsibility*. Hal ini ditujukan untuk menjadikan program TJSL yang dilaksanakan Bank dapat terarah, tepat sasaran, dan memberikan manfaat untuk seluruh pemangku kepentingan.

The implementation of CSER at the Bank is carried out by prioritizing moral and ethical principle by referring to ISO 26000 on *Guidance Standard on Social Responsibility*. This is intended to so that the CSER program carried out by the Bank is more focused, right-on target, and beneficial for all stakeholders.



## Voluntary vs Mandatory dalam TJSL Voluntary vs Mandatory in CSER

Pelaksanaan TJSL Bank Victoria terutama mengacu kepada undang-undang dan regulasi yang telah ditetapkan bagi kegiatan usaha perbankan. Selain itu, Bank merancang lingkup CSR yang sesuai dengan strategi bisnis Bank serta kebutuhan pemangku kepentingan. Berikut program CSR Bank yang merupakan kewajiban (*mandatory*) beserta dasar regulasinya.

The implementation of Bank Victoria's CSER mainly refers to the laws and regulations established for banking activities. In addition, the Bank plans CSR scope according to the Bank's business strategies and stakeholders' requirements. The following are the Bank's mandatory CSR programs including the regulations as the basis.

Kegiatan Activities	Dasar Regulasi Basis of Regulations
Ketenagakerjaan Employment	Undang-Undang No. 11 Tahun 2020 tentang Cipta Kerja. Law No. 11 of 2020 on Job Creation.
Perlindungan Konsumen Consumer Protection	<ul style="list-style-type: none"> <li>Undang-Undang Republik Indonesia No. 8 Tahun 1999 tanggal 20 April 1999 tentang Perlindungan Konsumen.</li> <li>Peraturan Otoritas Jasa Keuangan No. 1/POJK.07/2013 tanggal 26 Juli Tahun 2013 tentang Perlindungan Konsumen Sektor Jasa Keuangan.</li> <li>Law of the Republic of Indonesia No. 8 of 1999 dated 20 April 1999 on Consumer Protection.</li> <li>Financial Services Authority Regulation No. 1/POJK.07/2013 dated 26 July 2013 on Consumer Protection of Financial Services Institution.</li> </ul>
Literasi dan Inklusi Keuangan Financial Literacy and Inclusion	Peraturan Otoritas Jasa Keuangan No. 76/POJK.07/2016 tentang Peningkatan Literasi dan Inklusi Keuangan di Sektor Jasa Keuangan bagi Konsumen dan/atau Masyarakat. Financial Services Authority Regulation No. 76/POJK.07/2016 on Improving Financial Literacy and Inclusion in the Financial Services Sector for Consumers and/or Communities.

Sedangkan lingkup inisiatif yang melebihi kewajiban (*mandatory*), yaitu Bank turut mendukung dan berpartisipasi dalam mencapai SDGs, baik secara langsung maupun tidak langsung melalui pelaksanaan aktivitas dan program-program CSR Bank.

Meanwhile, with regards to the initiative scopes which exceed the mandatory requirement, the Bank supports and participates in achieving Sustainable Development Goals, either directly or indirectly, through the execution of Bank's CSR activities and programs.

## Biaya TJSL CSER Budget

Bank Victoria mengalokasikan anggaran kegiatan TJSL setiap tahunnya. Anggaran tersebut sepenuhnya berasal dari pendanaan internal. Pada tahun 2021, anggaran dan realisasi dana CSR Bank ditunjukkan sebagai berikut.

Bank Victoria allocates budget for CSER activities annually. The budget is fully supported by internal funding. Budget and realization of the Bank's CSR funds in 2021 are shown below.

Kegiatan Activities	Anggaran Budget (Rp)	Realisasi Realization (Rp)
Bidang Tanggung Jawab Ketenagakerjaan, Kesehatan dan Keselamatan Kerja (K3) Employment, Occupational Health and Safety (OHS) Responsibility Sector	533,020,507	533,020,507

Kegiatan Activities	Anggaran Budget (Rp)	Realisasi Realization (Rp)
Bidang Pengembangan Sosial dan Kemasyarakatan Social and Community Development Sector	70,667,737	70,667,737
Bidang Pengembangan Sarana Pendidikan Educational Facilities Development Sector	39,789,600	39,789,600
<b>Total</b>	<b>643,477,844</b>	<b>643,477,844</b>

## Tanggung Jawab terkait Hak Asasi Manusia Responsibility related to Human Rights

### Komitmen dan Kebijakan terkait HAM

Bank berkomitmen penuh terhadap penegakan Hak Asasi Manusia (HAM). Bank juga berkomitmen untuk patuh pada peraturan perundang-undangan, terutama yang berkaitan dengan HAM. Bank memiliki kebijakan untuk memberikan memberikan kondisi yang aman dan nyaman serta penerapan prinsip-prinsip HAM bagi para pemangku kepentingan. Kebijakan tersebut antara lain diatur dalam Peraturan Perusahaan, Kode Etik, serta *Standard Operation Procedure* (SOP) yang mengacu pada peraturan perundang-undangan yang berlaku. Sebagai pelaksanaan uji tuntas, Bank melakukan telaah secara berkala terhadap regulasi yang berkaitan dengan HAM.

### Perumusan dan Pengelolaan HAM

Sebagai perusahaan yang bergerak di industri perbankan, aktivitas Bank Victoria tidak memiliki isu-isu HAM yang signifikan yang secara langsung berkaitan dengan aktivitas Bank. Meskipun demikian, berdasarkan hasil uji tuntas yang dilakukan Bank, terdapat isu-isu HAM yang relevan dengan aktivitas Bank. Berdasarkan hasil pemetaan tersebut, isu-isu HAM yang relevan dengan Bank adalah pada bidang ketenagakerjaan dan pelayanan nasabah, termasuk kerahasiaan data nasabah. Isu-isu HAM yang ada di Bank serta risiko dan rencana mitigasinya sebagai berikut.

### Commitments and Policies related to Human Rights

The Bank is committed to upholding Human Rights. The Bank is also committed to complying with the laws and regulations, especially related to the Human Rights. The Bank has a policy in place, to provide safe and comfortable condition, and to implement Human Rights principles to all stakeholders. These policies among others are regulated under Company Regulations, Code of Conduct, and Standard Operating Procedures (SOP), which refer to the prevailing laws and regulations. As the implementation of due diligence, the Bank conducts periodic reviews of regulations related to Human Rights.

### Formulation and Management of Human Rights

As a company in banking sector, Bank Victoria's activities do not have any significant Human Rights issues which are directly related to the Bank's activities. Nevertheless, based on due diligence carried out by the Bank, there are Human Rights issues relevant to the Bank's activities. Based on such mapping results, Human Rights issues relevant to the Bank are in the employment and customer services sector, including confidentiality of customer's data. Human Rights issues at the Bank including all risks and the mitigating plans are as follows.

Isu Terkait Relevant Issues	Risiko yang Timbul Risks Incurred	Rencana Mitigasi Mitigation Plan
<p>Hak karyawan:</p> <ul style="list-style-type: none"> <li>Waktu kerja;</li> <li>Hak cuti;</li> <li>Hak menjalankan ibadah;</li> <li>Cuti melahirkan; dan</li> <li>Izin laktasi.</li> </ul> <p>Employee's rights;</p> <ul style="list-style-type: none"> <li>Business hours;</li> <li>Leave rights;</li> <li>The right to practice worship;</li> <li>Maternity Leave; and</li> <li>Lactating permit.</li> </ul>	<ul style="list-style-type: none"> <li>Terganggunya hubungan kerja lingkungan kerja yang harmonis; serta dan</li> <li>Berkurangnya produktivitas karyawan.</li> <li>Disruption of work relationships harmonious work environment; and</li> <li>Reduced employee productivity.</li> </ul>	<p>Penyusunan Peraturan Perusahaan, Kode Etik, dan <i>Standard Operation Procedures</i> (SOP) dengan memperhatikan aspek HAM.</p> <p>Developing Company Regulations, Code of Conduct, and Standard Operating Procedures (SOP) by considering Human Rights aspect.</p>
<p>Hak nasabah:</p> <ul style="list-style-type: none"> <li>Call center dan situs web; serta</li> <li>Whistleblowing system.</li> </ul> <p>Customers' rights:</p> <ul style="list-style-type: none"> <li>Call center and website; and</li> <li>Whistleblowing system.</li> </ul>	<ul style="list-style-type: none"> <li>Keamanan data nasabah; dan</li> <li>Diskriminasi nasabah.</li> <li>Customer data safety; and</li> <li>Discrimination of customers.</li> </ul>	<ul style="list-style-type: none"> <li>Transparansi informasi produk dan pelayanan; serta</li> <li>Penyusunan SOP pelayanan terhadap nasabah dengan memperhatikan aspek HAM.</li> <li>Transparency of product and services information; and</li> <li>Preparing SOP for customer services with due regard to human rights aspects.</li> </ul>

## Dampak Pengelolaan HAM

Dengan penerapan HAM dalam kegiatan usaha, Bank dapat meningkatkan kemitraan dan kebersamaan dengan asas kekeluargaan yang membangkitkan jiwa persatuan bagi semua karyawan untuk bersinergi menyumbangkan pikiran dan tenaga secara optimal ke arah pencapaian tujuan Bank dalam suasana kerja yang harmonis. Dengan demikian, terwujud produktivitas kerja dalam lingkungan kerja yang aman dan sehat, kedisiplinan, sikap dan etos kerja yang menjamin kesejahteraan, kesehatan dan keselamatan kerja karyawan.

## Impact of Human Rights Management

By implementing Human Rights in the business activities, the Bank is able to enhance partnership and solidarity based on kinship principle, which encourages the unity spirit for all employees to collectively and optimally contribute their thoughts and efforts to achieve the Bank's goals in a harmonious work environment. As such, it is possible to achieve work productivity in a safe and healthy work environment, discipline, work behavior and ethics that guarantees employee's welfare, occupational health and safety.

## Tanggung Jawab terkait Operasi yang Adil Responsibility related to Fair Operations

### Komitmen dan Kebijakan terkait Operasi yang Adil

Dalam mewujudkan pelaksanaan kegiatan perbankan yang adil, Bank mengacu pada ISO 26000 serta menjalankan berbagai kebijakan internal yang bertujuan untuk memastikan terealisasinya operasi yang adil, seperti kebijakan anti korupsi, kebijakan persaingan operasi yang adil, kebijakan menghargai hak kekayaan intelektual, dan kebijakan terkait lobi, kontribusi politik, dan keterlibatan politik. Komitmen dan kebijakan Bank dalam pelaksanaan CSR terkait dengan operasional Bank yang adil tertuang dalam berbagai rumusan kebijakan. Praktik operasi yang adil menyangkut perilaku etis dalam hubungan Bank dengan perusahaan lain, termasuk juga hubungan dengan lembaga pemerintah, serta mitra bisnis Bank.

### Commitments and Policies related to Fair Operations

In manifesting the implementation of fair banking activities, the Bank refers to ISO 26000 and applies various internal policies intended to ensure the realization of fair operations, such as anti-corruption policy, fair competition policy, policy related to respecting intellectual property rights, and policy related to lobbying, political contributions, and political involvement. The Bank's commitments and policies in implementing CSR related to the Bank's fair operations are set out in various policy formulation. The practice of fair operations is related to ethical behavior regarding Bank's relationship with other companies, including relationship with government institutions and the Bank's business partner.

## Perumusan dan Pengelolaan Operasi yang Adil

Bank melakukan pendekatan dan diskusi hasil uji tuntas dan telaah terhadap peraturan-peraturan terkait CSR operasi yang adil untuk mengenali dan merumuskan program CSR serta pemangku kepentingan yang penting terkait operasi yang adil. Pendekatan tersebut dilakukan untuk memastikan bahwa setiap keputusan dapat diimplementasikan dengan baik dan mampu memberikan dampak positif pada proses rantai nilai yang adil. Berikut rumusan CSR terkait operasi yang adil serta mitigasi risiko yang dilakukan Bank

## Formulation and Management of Fair Operations

The Bank takes an approach and discusses the due diligence results and reviews regulations related to fair CSR operations in order to identify and formulates the CSR programs and important stakeholders related to fair operations. This approach is taken to ensure that every decision can be implemented properly and will have positive impact on fair value chain process. The formulation of CSR related to fair operations and risk mitigations carried out by the Bank are as follows.

Isu Terkait Related Issues	Risiko yang Timbul Risk Incurred	Rencana Mitigasi Mitigation Plan
Tindakan korupsi yang dilakukan oleh karyawan di berbagai level organisasi. Acts of corruption committed by employees at various organizational levels.	Terjadinya pelanggaran hukum. Incurring violation of law.	Pelaksanaan kebijakan anti korupsi. Implementing anti-corruption policy.
Imbalan yang diterima karyawan di berbagai level organisasi dari pihak lain sehubungan dengan aktivitas operasional Bank. Benefits received by employees at various organizational levels from other parties in respect with the Bank's operational activities.	Adanya potensi gratifikasi dan <i>fraud</i> . Incurring potential gratification and fraud.	Pelaksanaan kebijakan gratifikasi. Implementing Company Regulations and Code of Conduct.
Keterlibatan karyawan dalam aktivitas politik dan secara terang-terangan menggunakan simbol atau atribut salah satu partai politik. Employee's involvement in political activities and openly uses symbols or attributes of any political party.	Terganggunya lingkungan kerja yang kondusif dan harmonis. Disruption of conducive and harmonious work environment.	Pelaksanaan Peraturan Perusahaan dan Kode Etik. Implementing Company Regulations and Code of Conduct.
Persaingan usaha dengan sesama pelaku usaha di bidang perbankan. Business competition with other entities in the banking sector.	Terjadinya pelanggaran hukum dan/atau benturan kepentingan. Incurring violation of law and/or potential conflict of interest.	Pelaksanaan kebijakan persaingan usaha yang adil dan Kode Etik. Implementing fair business competition policy and Code of Conduct.
Pelanggaran Hak Kekayaan Intelektual (HAKI). Violation of Intellectual Property Rights (IPR).	Terjadinya pelanggaran hukum. Incurring violation of law.	Pendaftaran HAKI dan/atau penggunaan HAKI sesuai peraturan yang berlaku. Registration of IP Rights (IPR) and/or using IPR in accordance with the applicable regulations.

## Dampak Pengelolaan Praktik Operasi yang Adil

Pelaksanaan CSR terhadap praktik operasi yang adil telah terlaksana secara kondusif sesuai dengan tugas dan tanggung jawab masing-masing karyawan. Tidak terdapat pengaduan dari karyawan, nasabah, maupun masyarakat terkait praktik ketidakadilan yang berdampak material. Bank Victoria telah patuh pada hukum dan regulasi yang berlaku dan tidak ada sanksi maupun pengaduan dari nasabah terkait data yang hilang atau penyalahgunaan data nasabah. Selain itu, berkat pelaksanaan praktik operasi yang adil, Bank Victoria dapat menjaga reputasi yang baik di tengah-tengah masyarakat.

## Impact of Fair Operation Practices

Implementation of CSR in fair operation practices was completed conducive according to each employee's duties and responsibilities. There were no complaints from employees, customers, or society related to unfair practices causing material adverse impact. Bank Victoria has complied with the prevailing laws and regulations and no sanction was imposed and no complaint received from customers related to missing data or customer's data misuse. In addition, the implementation of fair operation practices has enabled Bank Victoria to maintain good reputation amid the society.

# Tanggung Jawab terkait Lingkungan Hidup

## Responsibility related to Environment

### Komitmen dan Kebijakan terkait Lingkungan Hidup

Dalam rangka mengimplementasikan keuangan berkelanjutan, Bank berkomitmen untuk terus berupaya menekan dampak negatif dari operasional Bank terhadap lingkungan. Kebijakan Bank terkait pengelolaan dan perlindungan lingkungan hidup diwujudkan dalam bentuk himbauan, maklumat, dan peraturan Bank dalam rangka meminimalisir dampak operasional Bank terhadap lingkungan hidup.

Terkait dengan produk/jasa keuangan, Perseroan telah memiliki proses pemberian kredit korporasi dan komersial yang mengharuskan debitur untuk memiliki izin analisis mengenai dampak lingkungan hidup (AMDAL) atau Upaya Pengelolaan Lingkungan dan Upaya Pemantauan Lingkungan. Bank mengatur persyaratan khusus bagi *developer* pengolah lahan pembangunan perumahan dan kawasan pemukiman dengan luas 25 hektare atau lebih wajib memiliki analisis mengenai dampak lingkungan hidup (AMDAL). Upaya ini dilakukan sebagai wujud respon Bank Victoria terhadap ekspektasi bahwa Bank diharapkan membantu memperbaiki kualitas lingkungan hidup melalui pembiayaan kepada para debitur.

### Perumusan dan Pengelolaan Lingkungan Hidup

Pendekatan untuk mengenali dan merumuskan program CSR serta pemangku kepentingan yang penting terkait CSR terhadap lingkungan hidup dilakukan melalui diskusi hasil uji tuntas dan penelaahan terhadap peraturan-peraturan terkait lingkungan hidup. Berikut rumusan dan rencana mitigasi risiko Bank terkait lingkungan hidup.

### Commitments and Policies related to the Environment

In order to implement sustainable finance, the Bank is committed to consistently suppressing negative impact from the Bank's operations on the environment. The Bank's policies related to environmental management and protection are manifested in the form of appeals, information, and Bank regulations in order to minimize the Bank's operational impact on the environment.

With relation to financial products/services, the Company already has a process in place to provide corporate and commercial loans which requires the debtor to possess Environmental Impact Analysis (EIA) or Environmental Management Efforts and Environmental Monitoring Efforts. The Bank stipulates special requirements that developers who cultivate land for housing development and residential areas with an area of 25 hectares or more are required to have environmental impact analysis (AMDAL). The efforts are made as a manifestation of Bank Victoria's response towards the expectation that the Bank is required to assist in improving environmental quality through provision of loans to the debtors.

### Formulation and Management of Environment

The approach to identify and formulate CSR programs and important stakeholders related to CSR towards environment is carried out through discussion on due diligence results and review on environmental-related regulations. The following are the formulation and plans for the Bank's risk mitigation related to the environment.

Isu Terkait Related Issues	Risiko yang Timbul Risks Incurred	Rencana Mitigasi Mitigation Plan
Penyaluran kredit yang ramah lingkungan. Environmentally friendly credit distribution.	Pemberian pembiayaan untuk usaha ataupun kegiatan yang pada akhirnya menimbulkan atau mengakibatkan pencemaran atau kerusakan lingkungan hidup. Provision of financing to business or activities which at the end may cause environmental pollution or damage.	Melakukan seleksi dalam memberikan pembiayaan agar pembiayaan yang diberikan dapat berperan serta dalam pengelolaan lingkungan hidup. Applying selection in loan provision so that the loan provided can contribute towards environmental management.
Penggunaan energi dan sumber daya. Use of energy and resources.	Penggunaan energi dan sumber daya yang tidak bijak serta peningkatan biaya operasional. Reckless use of energy and resources and increased operational cost.	Penggunaan energi listrik dan air sesuai kebutuhan. Using electricity and water as necessary.
Kelestarian lingkungan hidup sekitar wilayah operasional. Environmental preservation within the operational areas.	Aktivitas usaha Bank terganggu baik secara langsung maupun tidak langsung. The Bank's business activities are directly or indirectly disrupted.	Turut serta dalam kegiatan kepedulian lingkungan. Participating in all environmental care activities.

## Dampak Pengelolaan Lingkungan Hidup

Kegiatan CSR terkait lingkungan hidup yang dilaksanakan Bank berdampak positif terhadap lingkungan serta mengurangi dampak negatif terhadap lingkungan dari kegiatan usaha Bank, di antaranya melalui capaian efisiensi penggunaan energi, air, dan kertas dibandingkan tahun sebelumnya.

## Impact of Environmental Management

CSR activities related to environment carried out by the Bank have brought positive impact on the environment and reduced negative impact on the environment from the Bank's business activities, among others, through the achievement of efficient use of energy, water, and paper compared to that of previous year.

## Tanggung Jawab terkait Ketenagakerjaan, Kesehatan dan Keselamatan Kerja Responsibility related to Employment, and Occupational Health and Safety

### Komitmen dan Kebijakan terkait Ketenagakerjaan dan K3

Bank memberikan perhatian dan komitmen yang tinggi terhadap karyawan, baik terkait kenyamanan bekerja, keselamatan dan kesehatan kerja (K3), pengembangan talenta, maupun tingkat kesejahteraan. Komitmen tersebut diwujudkan dengan pengelolaan karyawan yang mengacu pada peraturan perundang-undangan yang berlaku, terutama Undang-Undang No. 11 Tahun 2020 tentang Cipta Kerja dan peraturan turunannya. Bank juga telah memiliki Surat Keputusan Direksi No. 014/SK-DIR/07/19 tanggal 30 Juli 2019 tentang Standar Operasional Prosedur *Human Capital Management*.

### Commitments and Policies related to Employment and OHS

The Bank pays high attention and is highly committed to the employees, either related to work comfort, occupational health and safety (OHS), talent development, or welfare level. The commitment is manifested in the employee management that refers to the prevailing laws and regulations, particularly Law No. 11 of 2020 on Job Creation and the derivative regulations. The Bank also has the Board of Directors' Decision Letter No. 014/SK-DIR/07/19 dated 30 July 2019 on Standard Operating Procedures for Human Capital Management.

### Perumusan dan Pengelolaan Ketenagakerjaan dan K3

Rencana Bank dalam mengimplementasikan kegiatan CSR yang terkait dengan ketenagakerjaan dan K3 merupakan hasil uji tuntas yang dilakukan Bank sebagaimana ditunjukkan berikut.

### Formulation and Management of Employment and OHS

The Bank's plans in implementing CSR activities related to employment and OHS are results of due diligence carried out by the Bank as reflected below.



Isu Terkait Related Issues	Risiko yang Timbul Risk incurred	Rencana Mitigasi Mitigation Plan
<p>Ketenagakerjaan:</p> <ul style="list-style-type: none"> <li>• Perlakuan yang setara;</li> <li>• Remunerasi dan kesejahteraan; serta</li> <li>• Pengembangan kompetensi dan karier.</li> </ul> <p>Employment:</p> <ul style="list-style-type: none"> <li>• Equal treatment;</li> <li>• Remuneration and welfare; and</li> <li>• Competency and career development.</li> </ul> <p>Kesehatan dan keselamatan kerja:</p> <ul style="list-style-type: none"> <li>• Ketersediaan sarana dan prasarana keselamatan kerja; serta</li> <li>• Ketersediaan fasilitas dan tunjangan kesehatan.</li> </ul> <p>Occupational health and safety:</p> <ul style="list-style-type: none"> <li>• Availability of occupational safety facilities and infrastructure; and</li> <li>• Availability of health facilities and allowances.</li> </ul>	<ul style="list-style-type: none"> <li>• Peningkatan perputaran karyawan;</li> <li>• Penurunan jumlah karyawan yang handal;</li> <li>• Penurunan produktivitas kerja;</li> <li>• Lingkungan kerja yang tidak kondusif dan tidak aman; serta</li> <li>• Penurunan reputasi Bank.</li> <li>• Increase in employee turnover;</li> <li>• Decrease in number of competent employees;</li> <li>• Declined work productivity;</li> <li>• Non-conducive and unsafe work environment; and</li> <li>• Declined Bank reputation.</li> </ul>	<ul style="list-style-type: none"> <li>• Penerapan kesetaraan dan keadilan dalam kesempatan kerja, pengembangan kompetensi, dan pengembangan karier; serta</li> <li>• Pemberian remunerasi yang layak.</li> <li>• Implementing fairness and equality in job opportunities, competence development, and career development; and</li> <li>• Providing appropriate remuneration.</li> <li>• Pengecekan sarana dan prasarana kerja secara berkala; serta</li> <li>• Pemberian tunjangan kesehatan dan keselamatan kerja.</li> <li>• Periodically reviewing work facilities and infrastructure; and</li> <li>• Providing occupational health and safety allowances.</li> </ul>

### Dampak Pengelolaan Ketenagakerjaan dan K3

Pengelolaan ketenagakerjaan yang baik menjaga tingkat perputaran karyawan di Bank relatif stabil sehingga produktivitas karyawan dan kinerja perusahaan dapat terjaga. Selain itu, tingkat kecelakaan kerja juga dapat ditekan, bahkan tidak menimbulkan kecelakaan kerja yang bersifat fatal.

### Impact of Employment and OHS Management

Proper employment management helps to keep employee's turnover in the Bank stable, and maintain employees productivity and Company's performance. In addition, occupational accident rates can also be minimized, even to the extent that there is no fatal occupational accident.

## Tanggung Jawab terkait Pengembangan Sosial dan Masyarakat Responsibility related to Social and Community Development

### Komitmen dan Kebijakan terkait Pengembangan Sosial dan Masyarakat

Bank memiliki komitmen untuk berperan aktif dalam pembangunan ekonomi berkelanjutan guna meningkatkan kualitas kehidupan yang bermanfaat, baik bagi Bank sendiri, komunitas setempat maupun masyarakat pada umumnya. Komitmen tersebut diwujudkan melalui kebijakan mengenai kegiatan CSR aspek pengembangan sosial dan masyarakat yang disesuaikan dengan Surat Keputusan Direksi No. 027/SK-DIR/04/21 tanggal 29 April 2021 tentang *Corporate Social Responsibility* (CSR).

### Commitments and Policies related to Social and Community Development

The Bank is committed to actively participating in sustainable economic development in order to improve beneficial life quality for the Bank itself, for the local communities, and the public in general. Such commitment is manifested through policies regarding CSR activities on social and community development aspect, which are adjusted to the Board of Directors' Decision Letter No. 027/SK-DIR/04/21 dated 29 April 2021 on Corporate Social Responsibility (CSR).

Pada tahun 2021, pelaksanaan CSR terkait pengembangan sosial dan masyarakat dibuat lebih terarah dengan program-program jangka menengah dan jangka panjang yang telah ditetapkan dan dianggarkan dalam Rencana Bisnis Bank. Hal

In 2021, CSR implementation related to social and community development was arranged to focus more on medium-term and long-term programs that have been defined and budgeted in the Bank's Business Plan. This is intended so

ini bertujuan agar pengembangan sosial dan masyarakat secara berkelanjutan dapat benar-benar mendukung peningkatan kesejahteraan sosial dan ekonomi masyarakat.

## Perumusan dan Pengelolaan Pengembangan Sosial dan Masyarakat

Berdasarkan hasil uji tuntas, rumusan Bank terhadap beberapa aspek yang terkait dengan pengembangan sosial dan masyarakat serta penetapan rencana mitigasi risiko yang ditimbulkan melalui kebijakan dan/atau rencana terkait sebagai berikut.

Isu Terkait Related Issues	Risiko yang Timbul Risk Incurred	Rencana Mitigasi Mitigation Plan
Penggunaan tenaga kerja lokal. Use of local workforce.	Terbatasnya penyerapan tenaga kerja nasional. Limited number of national workforces absorption.	Merekrut tenaga kerja domestik dan lokal (sesuai wilayah operasional). Recruiting domestic and local workers (based on operational area).
Literasi dan inklusi keuangan. Financial literacy and inclusion.	Terbatasnya pengetahuan masyarakat terkait lembaga jasa keuangan dan manfaat yang diberikan. Lack of public knowledge on financial service institutions and their advantages.	Melaksanakan program literasi dan inklusi keuangan secara berkala dan terencana. Conducting periodic and planned financial literacy and inclusion programs.
Ketersediaan infrastruktur dan fasilitas umum. Availability of public infrastructures and facilities.	Rendahnya kesejahteraan sosial masyarakat. Low social community welfare.	Aktif berpartisipasi dalam kegiatan masyarakat. Participating actively in community activities.
Bantuan sosial. Social aid.		

that the sustainable social and community development can truly support the improvement of the community's social and economic welfare.

## Formulation and Management of Social and Community Development

Based on the due diligence results, the Bank's formulation on several aspects related to social and community development and the determination of mitigation plan for the risks incurred through related policies and/or plans are as shown below.

## Dampak Pengelolaan Pengembangan Sosial dan Masyarakat

Program pengembangan sosial dan masyarakat memberikan manfaat bagi Bank selaku pelaksana dan masyarakat selaku penerima program. Manfaat bagi Bank meliputi:

1. Memperoleh kepercayaan masyarakat;
2. Mendapatkan perspektif positif dari masyarakat;
3. Memperoleh reputasi yang baik dari masyarakat; serta
4. Mempererat hubungan dengan masyarakat dan pemangku kepentingan lainnya.

Sedangkan, manfaat bagi masyarakat meliputi:

1. Meningkatkan taraf hidup dan kesejahteraan para penerima manfaat;
2. Bagi penerima beasiswa, program beasiswa dapat memberikan kesempatan lebih luas bagi mereka untuk meningkatkan pendidikan dan prestasi untuk mencapai masa depan yang lebih baik;
3. Memiliki pengetahuan tentang pengelolaan keuangan serta layanan dan produk perbankan; serta
4. Mendapatkan fasilitas umum yang terjamin pemeliharaannya.

## Impacts of Social and Community Development Management

Social and community development programs bring benefits to the Bank as the implementer and to the community as the program recipient. Benefits for the Bank among others are:

1. Gaining the community's trust;
2. Gaining positive perspective from the community;
3. Gaining good reputation from the community; and
4. Strengthening the relationship between the community and other stakeholders.

Meanwhile, benefits for the community among others are:

1. Improving the living standards and welfare for the beneficiaries;
2. For scholarship recipients, the scholarship programs can give them a wider opportunity to enhance their education and achievement, so that they can have a better future;
3. Gaining knowledge regarding financial management and banking services and products; and
4. Gaining public facilities with guaranteed maintenance.

# Tanggung Jawab terkait Nasabah

## Responsibility related to Customers

### Komitmen dan Kebijakan terkait Nasabah

Bank Victoria berkomitmen untuk memberikan pelayanan terbaik kepada setiap nasabah yang direalisasikan dengan memberikan perlindungan simpanan dan kerahasiaan data nasabah serta kesempurnaan layanan dan kepuasan nasabah. Adapun kebijakan terkait tanggung jawab terhadap nasabah yang dijalankan Bank mengacu kepada Surat Keputusan Direksi No. 041/SK-DIR/07/14 tentang Kebijakan dan Prosedur Kualitas Pelayanan Nasabah (*Customer Experience*). Kebijakan tersebut berisi panduan Standar Pelayanan Nasabah, Evaluasi Penilaian Pelaksanaan Standar Pelayanan Nasabah, serta sistem *Reward and Punishment*.

### Commitments and Policies related to Customers

Bank Victoria is committed to providing the best services to each customer as manifested in providing savings protection, customers data confidentiality, and perfect services for customers satisfaction. Policies related to responsibility for customers as implemented by the Bank that refers to Board of Directors' Decision Letter No. 041/SK-DIR/07/14 on Policies and Procedures for Customer Service Quality (*Customer Experience*). This Policies contain guidelines for Customer Services Standards, Evaluation of Customer Services Standards Assessment, and Reward and Punishment System.

### Perumusan dan Pengelolaan Nasabah

Berdasarkan hasil uji tuntas, rumusan beberapa aspek yang terkait dengan nasabah pada aktivitas operasional yang dijalankan serta rencana mitigasi risiko yang dilakukan Bank sebagai berikut.

### Formulation and Management of Customers

Based on the due diligence, below is the formulation of several aspects related to customers in operational activities as well as the risk mitigation plans implemented by the Bank.

Isu Terkait Related Issues	Risiko yang Timbul Risk Incurred	Rencana Mitigasi Mitigation Plan
Produk dan layanan. Products and services.	<ul style="list-style-type: none"> <li>• Menurunnya jumlah nasabah;</li> <li>• Menghilangnya dana simpanan nasabah;</li> <li>• Bocornya informasi pribadi nasabah;</li> <li>• Menurunnya kepuasan dan kepercayaan nasabah; serta</li> <li>• Terhambatnya pertumbuhan usaha Bank.</li> </ul> <ul style="list-style-type: none"> <li>• Decreased number of customers;</li> <li>• Loss of customers' savings funds;</li> <li>• Customers' personal information leakage;</li> <li>• Decreased customer's satisfaction and trust; and</li> <li>• Stagnant business growth of the Bank.</li> </ul>	Membuat dan mengembangkan produk dan layanan yang kompetitif. Creating and developing competitive products and services.
Keamanan simpanan nasabah. Customer deposits safety.		<ul style="list-style-type: none"> <li>• Meningkatkan kualitas dan kapasitas sistem teknologi perbankan; dan</li> <li>• Turut serta dalam Lembaga Penjamin Simpanan.</li> <li>• Improving the quality and capacity of banking technology system; and</li> <li>• Participating in the Deposit Insurance Agency.</li> </ul>
Keamanan data nasabah. Security of customer data.		Meningkatkan kualitas dan kapasitas sistem teknologi informasi perbankan. Improving quality and capacity of banking information technology system.
Kepuasan nasabah. Customer satisfaction.		Memastikan terpenuhinya <i>service level agreement</i> (SLA) yang ditetapkan. Ensuring fulfillment of service level agreement (SLA).

## Dampak Pengelolaan Nasabah

Pada tahun 2021, pelaksanaan kegiatan CSR terkait nasabah telah memberikan rasa nyaman dan keamanan bertransaksi bagi nasabah sehingga berdampak pada pertumbuhan jumlah nasabah Bank dari tahun ke tahun serta meningkatnya kepercayaan nasabah.

## Impact of Customer Management

In 2021, the implementation of CSR activities related to customers brought comfort and security for the customers in making transactions that helps to increase the number of Bank's customers every year and helps to boost customers' trust.

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**Uraian lengkap mengenai pelaksanaan tanggung jawab sosial dan lingkungan yang dilakukan Bank Victoria disajikan pada Laporan Keberlanjutan yang disusun secara terpisah dari Laporan Tahunan ini.**

**Complete description regarding implementation of social and environmental responsibility carried out by Bank Victoria is presented in the Sustainability Report, prepared separately from this Annual Report.**

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# Struktur Permodalan dan Manajemen Risiko

## Risk Capital Structure and Risk Management Practices









## Pengungkapan Permodalan

Bank senantiasa melakukan pengelolaan dan menjaga soliditas struktur permodalan. Hal ini untuk mewujudkan stabilitas sistem keuangan yang tumbuh secara organik dan seimbang dengan didukung oleh kinerja keuangan Bank yang sehat.

## Kebijakan Manajemen Permodalan

Kebijakan pengelolaan permodalan disusun dengan memperhatikan potensi bisnis dan tetap menerapkan prinsip kehati-hatian serta mengacu kepada Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tanggal 2 Februari 2016 dan No. 34/POJK.03/2016 tanggal 26 September 2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum.

Penetapan strategi dan kebijakan pengelolaan permodalan Bank Victoria merupakan bagian dari Rencana Bisnis Bank yang didiskusikan secara berkala bersama Direksi dan disetujui oleh Dewan Komisaris.

## Disclosure of Capital

The Bank always manages and maintains solid capital structure. This is to realize a financial system stability that grows in an organic and balanced manner, supported by sound financial performance of the Bank.

## Capital Management Policy

Capital management policies are formulated by paying attention to the business potential, continuously applying prudential principles, referring to the Financial Services Authority Regulation No. 11/POJK.03/2016 dated 2 February 2016 and No. 34/POJK.03/2016 dated 26 September 2016 on Capital Adequacy Ratio for Commercial Banks.

Establishment of strategies and policies of Bank Victoria's capital management is part of the Bank's Business Plan that is regularly discussed with the Board of Directors and approved by the Board of Commissioners.



## Struktur Permodalan

Berdasarkan Peraturan Otoritas Jasa Keuangan, struktur modal Bank Victoria terdiri dari:

1. Modal inti (*tier 1*), yang meliputi:
  - a. Modal inti utama (*common equity tier 1*);
  - b. Modal inti tambahan (*additional tier 1*); dan
2. Modal pelengkap (*tier 2*).

Total modal Bank pada Desember 2021 sebesar Rp2,91 triliun, yang didominasi oleh modal inti utama Bank sebesar Rp2,08 triliun. Apabila dibandingkan dengan total modal pada Desember 2020 yang sebesar Rp2,86 triliun, maka terjadi peningkatan sebesar Rp44,12 miliar atau 1,54%. Peningkatan tersebut terjadi pada komponen modal inti dengan peningkatan sebesar Rp158,85 miliar terutama pada instrumen modal inti utama untuk modal disetor dan dampak dari pencapaian laba selama tahun 2021. Di sisi lain, komponen modal pelengkap (*tier 2*) pada tahun 2021 mengalami penurunan sebesar Rp114,73 miliar atau 12,16% menjadi sebesar Rp828,72 miliar jika dibandingkan dengan tahun sebelumnya.

Secara konsolidasi, Bank Victoria dan Entitas Anak memiliki total modal sebesar Rp3,17 triliun atau meningkat sebesar 1,85% dari tahun 2020 sebesar Rp3,12 triliun. Peningkatan tersebut terjadi pada komponen modal inti sebesar Rp169,64 miliar terutama pada instrumen modal inti utama untuk modal disetor dan dampak dari pencapaian laba selama tahun 2021. Di sisi lain, komponen modal pelengkap (*tier 2*) pada tahun 2021 mengalami penurunan sebesar Rp112,11 miliar atau 11,82% menjadi sebesar Rp836,09 miliar jika dibandingkan dengan tahun sebelumnya.

Dengan struktur permodalan tersebut, rasio KPMM pada Desember 2021 secara individual menjadi sebesar 17,49% dibandingkan tahun sebelumnya sebesar 16,68%. Sementara itu, secara konsolidasi rasio KPMM pada Desember 2021 menjadi 17,79% dibandingkan Desember 2020 sebesar 16,71%.

## Kecukupan Permodalan

Permodalan Bank Victoria telah mengacu kepada regulasi Bank Indonesia dan Otoritas Jasa Keuangan (Basel II dan Basel III), yaitu:

1. **Pilar 1 (*Minimum Capital Requirements*)**  
Berdasarkan ketentuan regulasi, secara umum, metode yang digunakan untuk menilai kecukupan dan kebutuhan modal untuk risiko kredit, risiko pasar, dan risiko operasional.
2. **Pilar 2 (*Supervisory Review Process*)**  
Bank Victoria telah menerapkan *Internal Capital Adequacy Assessment Process* (ICAAP), yaitu proses untuk menetapkan kecukupan modal yang sesuai dengan profil risiko Bank, dan menetapkan strategi untuk memelihara tingkat permodalan.
3. **Pilar 3 (*Market Discipline*)**  
Bank Victoria menerapkan disiplin pasar melalui transparansi dan pengungkapan atas informasi keuangan Bank.

## Capital Structure

Based on Financial Services Authority, Bank Victoria's capital structure consists of:

1. Tier 1, which includes:
  - a. Common equity tier 1;
  - b. Additional tier 1; and
2. Tier 2.

The Bank's total capital in December 2021 was Rp2.91 trillion, which was dominated by the Bank's common equity tier 1 of Rp2.08 trillion. When compared to the total capital in December 2020 which was Rp2.86 trillion, there was an increase of Rp44.12 billion or 1.54%. The increase occurred in the core capital component of Rp158.85 billion, especially in the common equity tier 1 instrument for paid-up capital and the impact of achieving profits throughout 2021. On the other hand, the supplementary capital component (*tier 2*) in 2021 decreased by Rp114.73 billion or 12.16% to Rp828.72 billion compared to that of previous year.

On a consolidated basis, Bank Victoria and its Subsidiary have a total capital of Rp3.17 trillion, an increase of 1.85% from that of 2020 of Rp3.12 trillion. This increase occurred in the core capital component of Rp169.64 billion, especially in the common equity tier 1 capital instrument for paid-up capital and the impact of achieving profits throughout 2021. On the other hand, supplementary capital component (*tier 2*) in 2021 decreased by Rp112.11 billion or 11.82% to Rp836.09 billion compared to that of previous year.

With such capital structure, the individual CAR in December 2021 was 17.49% compared to that of previous year of 16.68%. Whereas, on a consolidated basis, the CAR ratio in December 2021 was 17.79% compared to in December 2020 of 16.71%.

## Capital Adequacy

Bank Victoria's capital refers to regulations of Bank Indonesia and Financial Services Authority (Basel II and Basel III), which are:

1. **Pillar 1 (*Minimum Capital Requirements*)**  
Based on the regulatory provisions, in general the method used for assessing capital adequacy and requirements for credit risk, market risk, and operational risk.
2. **Pillar 2 (*Supervisory Review Process*)**  
Bank Victoria has implemented the *Internal Capital Adequacy Assessment Process* (ICAAP), which is a process to determine the capital adequacy according to the Bank's risk profile and to determine a strategy to maintain capital rating.
3. **Pillar 3 (*Market Discipline*)**  
Bank Victoria applies market discipline through transparency and disclosure of the Bank's financial information.

Berkaitan dengan implementasi Basel III, regulator telah mengeluarkan ketentuan mengenai kewajiban penyediaan modal minimum bank umum, dimana Bank wajib membentuk tambahan modal sebagai penyangga (*buffer*) yang merupakan implementasi dari Basel III. Tambahan modal tersebut berupa:

- a. *Capital conservation buffer*, merupakan penyangga untuk mengantisipasi terjadinya kerugian pada periode krisis.
- b. *Countercyclical buffer*, merupakan penyangga untuk mengantisipasi terjadinya kerugian apabila pertumbuhan kredit perbankan berlebihan yang berpotensi mengganggu stabilitas sistem keuangan.
- c. *Capital surcharge* untuk *domestic systemically important bank* (D-SIB), merupakan penyangga untuk mengurangi dampak negatif terhadap stabilitas sistem keuangan dan perekonomian apabila terjadi kegagalan Bank yang berdampak sistemik, melalui peningkatan kemampuan Bank dalam menyerap kerugian.

Bank Victoria telah menerapkan perhitungan kewajiban membentuk tambahan modal sebagai penyangga (*buffer*) dalam Kewajiban Penyediaan Modal Minimum (KPMM) sesuai dengan ketentuan regulator. Sebagai bank BUKU II, Bank Victoria tidak diwajibkan untuk menyediakan *capital conservation buffer* karena ketentuan penyediaan modal tersebut berlaku untuk bank BUKU III dan BUKU IV.

In relation to the implementation of Basel III, the regulator has issued a provision on Minimum Capital Adequacy Ratio for Commercial Bank, in which the Bank is required to establish additional capital as a buffer which is an implementation of Basel III. The additional capital can be in the form of:

- a. Capital Conservation buffer, which serves as a buffer to anticipate a loss in crisis period.
- b. Countercyclical buffer, which serves as a buffer to anticipate losses in the event of excessive banking credit growth that potentially interferes with the financial system stability.
- c. Capital Surcharge for domestic systemically important banks (D-SIB), which serves as a buffer to reduce negative impacts on the financial system stability and economy in the event of Bank failure that has systemic impact, through the improvement of the Bank's ability to absorb losses.

Bank Victoria has applied the calculation of the requirement to form additional capital as a buffer in the Minimum Capital Adequacy Ratio (CAR) in accordance with the regulatory provisions. As a bank of BUKU II, Bank Victoria is not required to provide Capital Conservation Buffer because the capital requirement applies to banks of BUKU III and BUKU IV.

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## Manajemen Risiko

### Risk Management

Kedisiplinan penerapan manajemen risiko dapat meningkatkan ketahanan Bank dalam menghadapi tekanan dan perubahan lingkungan yang terjadi. Oleh karena itu, Bank perlu meningkatkan penerapan manajemen risiko yang baik dan memastikan seluruh risiko yang dihadapi dapat diidentifikasi, diukur, dipantau, dan dikendalikan secara tepat terhadap faktor-faktor risiko yang dapat mempengaruhi kinerja keuangan Bank guna mencegah atau meminimalkan kerugian yang timbul dari kegiatan Bank ataupun mencegah hal-hal yang dapat mengganggu kelangsungan usaha Bank.

Discipline in risk management implementation can increase the Bank's resilience in dealing with pressures and occurring environmental changes. Therefore, the Bank needs to improve the risk management implementation properly and ensure that all risks faced can be identified, measured, monitored, and properly controlled against risk factors that may affect the Bank's financial performance in order to prevent or minimize losses arising from the Bank's activities or to prevent matters that can interfere with the Bank's business continuity.

### Dasar Penerapan Manajemen Risiko

Dalam penerapan manajemen risiko, Bank Victoria senantiasa patuh dan taat terhadap regulasi dan perundang-undangan yang berlaku, antara lain mengacu pada:

### Basis of Risk Management Implementation

In risk management implementation, Bank Victoria always complies with and adheres to the laws and regulations applicable in Indonesia with reference to:

#### Dasar Penerapan Manajemen Risiko Individu dan Konsolidasi Basis of Risk Management Implementation, Individual and Consolidation

Peraturan Otoritas Jasa Keuangan No. 4/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum.	Financial Services Authority Regulation No. 4/POJK.03/2016 on Sound Level Assessment for Commercial Banks.
Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum.	Financial Services Authority Regulation No. 18/POJK.03/2016 on Implementation of Risk Management for Commercial Banks.
Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 tentang Penerapan Tata Kelola bagi Bank Umum.	Financial Services Authority Regulation No. 55/POJK.03/2016 on Implementation of Governance for Commercial Banks.
Peraturan Otoritas Jasa Keuangan No. 38/POJK.03/2017 tentang Penerapan Manajemen Risiko secara Konsolidasi bagi Bank yang Melakukan Pengendalian terhadap Perusahaan Anak.	Financial Services Authority Regulation No. 38/POJK.03/2017 on the Implementation of Consolidated Risk Management for Banks Exercising Control over Subsidiary Companies.
Peraturan Otoritas Jasa Keuangan No. 37/POJK.03/2019 tentang Transparansi dan Publikasi Laporan Bank.	Financial Services Authority Regulation No. 37/POJK.03/2019 on Transparency and Publication of Bank Reports.
Surat Edaran Otoritas Jasa Keuangan No. 34 /SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum.	Financial Services Authority Circular No. 34/SEOJK.03/2016 on Risk Management Implementation for Commercial Banks.
Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum.	Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks.
Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2017 tentang Penilaian Tingkat Kesehatan Bank Umum.	Financial Services Authority Circular No. 14/SEOJK.03/2017 on Sound Level Assessment for Commercial Banks.
Surat Edaran Otoritas Jasa Keuangan No. 9/SEOJK.03/2020 tentang Transparansi dan Publikasi Bank Umum Konvensional.	Financial Services Authority Circular No. 9/SEOJK.03/2020 on Transparency and Publication of Conventional Commercial Banks.

### Penerapan Manajemen Risiko Bank

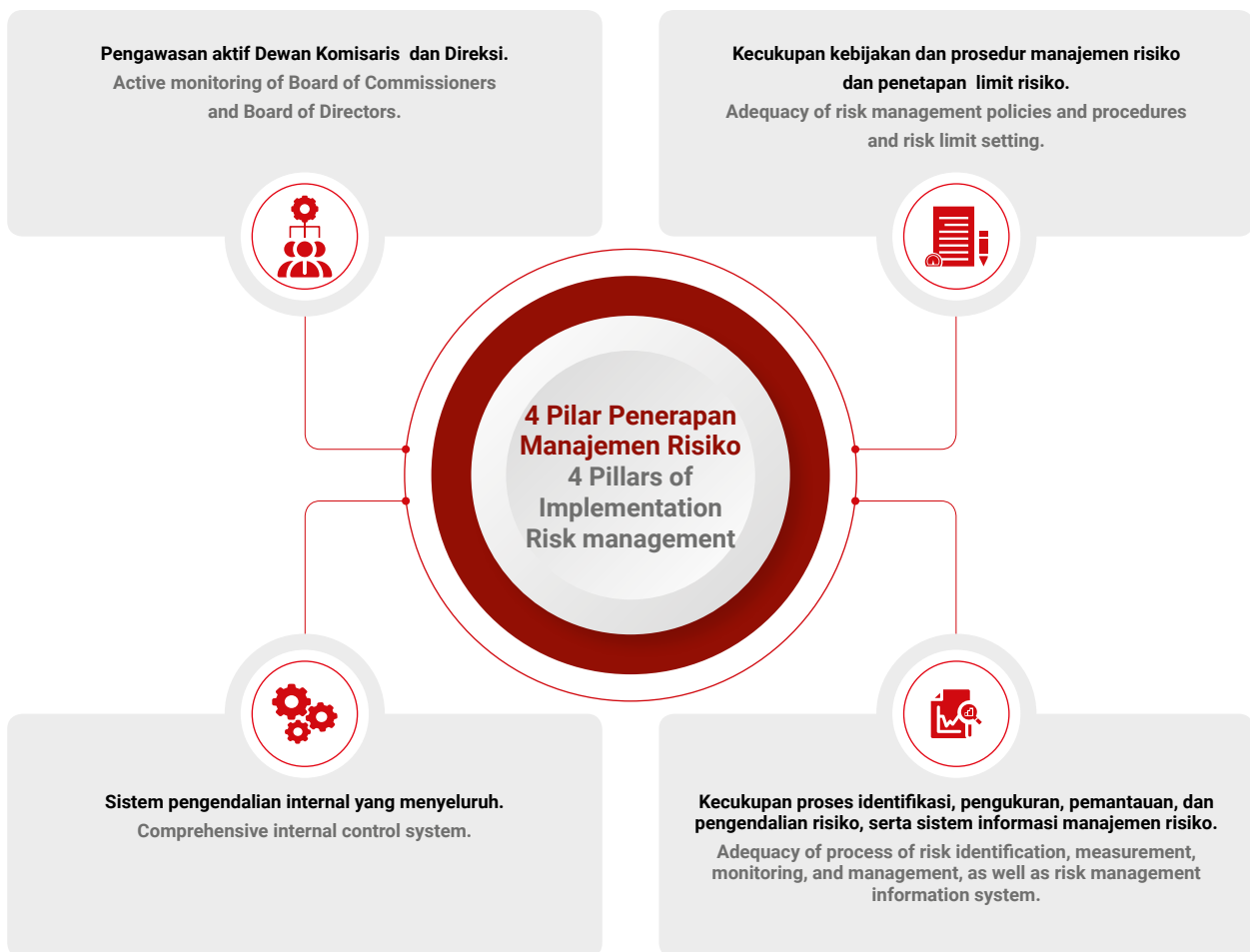
Bank secara berkesinambungan melakukan penerapan manajemen risiko pada setiap aktivitas fungsional operasional Bank untuk mencapai pertumbuhan bisnis maupun aktivitas operasional yang sehat dan berkelanjutan. Dalam menjalankan kegiatan usaha, Bank mengedepankan prinsip-prinsip penerapan manajemen risiko dan ketentuan yang berlaku.

### Implementation of Bank Risk Management

Bank continuously implements risk management in every operational functional activity of the Bank to achieve sound and sustainable business growth and operational activities. In carrying out its business activities, the Bank prioritizes the principles of risk management implementation and applicable regulations.

Adapun penerapan manajemen risiko Bank Victoria secara efektif dilakukan melalui 4 (empat) pilar, yaitu:

Risk management at Bank Victoria is implemented effectively through 4 (four) pillars, which are:



### Pengawasan Aktif Dewan Komisaris dan Direksi

Penerapan manajemen risiko dilakukan berdasarkan wewenang dan tanggung jawab yang jelas pada masing-masing pihak sesuai jenjang jabatan untuk mendukung penerapan manajemen risiko secara efektif. Oleh karena itu, peran aktif Direksi dan Dewan Komisaris bertanggung jawab atas efektivitas penerapan manajemen risiko sesuai dengan karakteristik, kompleksitas, dan profil risiko Bank, dan memahami dengan baik risiko yang melekat pada kegiatan bisnis yang dijalankan serta memberikan arahan yang jelas, melakukan pengawasan dan mitigasi secara aktif, dan mengembangkan budaya manajemen risiko di Bank.

### Active Monitoring of Board of Commissioners and Board of Directors

Risk management is implemented based on clear authority and responsibility for each party according to the level of position to support effective risk management. Therefore, active roles of the Board of Directors and Board of Commissioners are to be responsible for the effectiveness of risk management implementation, according to the characteristics, complexity, and risk profile of the Bank, to properly understand the risks inherent in the business activities, to provide clear directions, to conduct active monitoring and mitigation, and to develop risk management culture at the Bank.

### Kecukupan Kebijakan, Prosedur, dan Penetapan Limit Manajemen Risiko

Aktivitas operasional Bank telah didukung dengan kerangka manajemen risiko yang mencakup kebijakan dan prosedur penerapan manajemen risiko sejalan dengan visi, misi, strategi bisnis Bank, tingkat risiko yang diambil dan toleransi risiko, serta limit tanpa mengabaikan kemampuan modal Bank untuk dapat menyerap eksposur risiko.

### Adequacy of Policies, Procedures, and Limit Establishment of Risk Management

The Bank's operational activities are supported by risk management framework that includes policies and procedures for implementing risk management in line with the Bank's vision, mission, business strategy, risk appetite, and risk tolerance, as well as limits without compromising the Bank's capital ability to absorb risk exposure.

Kebijakan dan prosedur penerapan manajemen risiko merupakan arahan tertulis pada aktivitas fungsional Bank yang dalam penyusunannya juga telah memperhatikan kompleksitas kegiatan usaha, profil risiko, dan keterkaitan antar risiko, serta peraturan yang ditetapkan otoritas dan/atau praktik perbankan yang sehat.

Perihal penetapan limit didasarkan atas limit secara keseluruhan, limit per jenis risiko, dan limit per aktivitas fungsional tertentu yang memiliki eksposur risiko disesuaikan dengan kompleksitas dan usaha Bank serta kepatuhan terhadap ketentuan yang berlaku. Sedangkan, dalam penyusunan dan pengajuan limit diusulkan oleh unit kerja (*Risk Taking Unit*) dan disampaikan kepada Divisi *Risk Management/Integrated* untuk dievaluasi dan diajukan kepada Komite Manajemen Risiko. Selanjutnya, toleransi dan limit risiko direkomendasikan kepada Direktur Utama untuk mendapatkan persetujuan dengan sepengetahuan Dewan Komisaris.

### Cekupan Proses Identifikasi, Pengukuran, Pemantauan, Pengendalian, dan Sistem Informasi Manajemen Risiko

Bank menjalankan proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko didukung oleh sistem informasi manajemen dan laporan yang informatif mengenai kondisi keuangan, kinerja aktivitas fungsional, dan eksposur risiko Bank.

Proses manajemen risiko Bank meliputi:

<p><b>Identifikasi</b></p> <p>Dalam rangka melaksanakan proses identifikasi risiko, Bank telah melakukan analisis terhadap seluruh jenis risiko, terutama karakteristik risiko yang melekat yang berpotensi merugikan Bank. Identifikasi risiko bersifat proaktif. Identifikasi risiko dilakukan sesuai dengan karakteristik dan kompleksitas kegiatan usaha Bank.</p>	<p><b>Identification</b></p> <p>In order to process risk identification, the Bank has analyzed all types of risks, particularly the characteristics of inherent risks that may potentially harm the Bank. Proactive risk identification Risk identification is performed according to the characteristic and complexity of the Bank's business activities.</p>
<p><b>Pengukuran</b></p> <p>Mengevaluasi secara berkala dan disesuaikan dengan aturan yang berlaku dan prosedur yang digunakan untuk mengukur risiko serta menyempurnakan sistem pengukuran risiko dalam hal terdapat perubahan kegiatan usaha Bank, produk, transaksi, dan faktor risiko yang bersifat material, sehingga dapat diambil tindakan mitigasi risiko.</p>	<p><b>Measurement</b></p> <p>Periodic evaluations adjusted to the applicable regulations and procedures used to measure risk and improvement of risk measurement system in the event that there are changes in the Bank's business activities, products, transactions, and material risk factors, so that risk mitigation actions can be taken.</p>
<p><b>Pemantauan</b></p> <p>Sistem pemantauan risiko antara lain mencakup konsistensi pelaksanaan dengan kebijakan dan prosedur yang ditetapkan dan peraturan terkait eksternal lainnya. Pemantauan didukung oleh sistem informasi manajemen risiko dan disesuaikan dengan kebutuhan dalam rangka penerapan manajemen risiko yang efektif.</p>	<p><b>Monitoring</b></p> <p>The risk monitoring system includes consistency of implementation with the established policies and procedures and other related external regulations. Monitoring is supported by the risk management information system, which is tailored to needs in order to implement effective risk management.</p>
<p><b>Pengendalian</b></p> <p>Proses pengendalian risiko yang diterapkan Bank disesuaikan dengan eksposur risiko maupun tingkat risiko yang akan diambil dan toleransi risiko. Hal ini dilakukan dengan memberikan tindak lanjut atas risiko yang bersifat material dan signifikan, pengawasan melekat, dan pelaksanaan audit internal secara berkala.</p>	<p><b>Control</b></p> <p>The risk control process that is applied by the Bank is adjusted to the risk exposure, risk appetite, and risk tolerance. This is done, among others, by following up on material and significant risks, attached monitoring, and conducting internal audits periodically.</p>

Penerapan proses manajemen risiko didukung oleh sistem informasi manajemen risiko dalam pelaksanaan identifikasi, pengukuran, pemantauan, dan pengendalian risiko serta pelaporan yang disampaikan kepada pihak manajemen sebagai salah satu langkah strategis dalam pengambilan keputusan.

The policies and procedures for implementing risk management are written directions for the Bank's functional activities, which in their preparation have also considered the complexity of business activities, risk profile, interrelationship between risks, and regulations set by the authorities, and/or sound banking practices.

Limits are determined based on overall limits, limits per type of risk, and limits per certain functional activities that have risk exposure adjusted to the Bank's complexity and business as well as compliance with applicable regulations. Whereas, limits are prepared and proposed by Risk Taking Unit and submitted to the Risk Management/Integrated Division to be evaluated and proposed to the Risk Management Committee. Furthermore, risk tolerance and risk limits are recommended to the President Director for approval under acknowledgment of the Board of Commissioners.

### Adequacy of Identification, Measurement, Monitoring, and Control Processes, as well as Risk Management Information System

The Bank carries out the process of identifying, measuring, monitoring, and controlling risk supported by management information system and informative reports regarding the Bank's financial condition, functional activity performance, and risk exposure.

The Bank's risk management process includes:

The risk management process is supported by a risk management information system in implementing the process of identifying, measuring, monitoring, and controlling risks, and reporting to the Management as one strategic step in decision making.



Menyadari bahwa pengelolaan risiko menjadi tanggung jawab seluruh *Risk Taking Unit*, maka keberhasilan pengelolaan risiko ditentukan oleh adanya *risk awareness* di seluruh *Risk Taking Unit* yang dibekali dengan kompetensi yang memadai.

Sistem informasi manajemen risiko dikembangkan sesuai dengan kebutuhan Bank dalam rangka penerapan manajemen risiko yang efektif. Sistem informasi manajemen risiko dan informasi yang dihasilkan disesuaikan dengan karakteristik dan kompleksitas kegiatan usaha Bank, serta adaptif terhadap perubahan.

### Sistem Pengendalian Internal terhadap Penerapan Manajemen Risiko

Sistem pengendalian internal merupakan mekanisme proses pengawasan Bank untuk:

1. Mengelola dan mengendalikan risiko yang melekat pada kegiatan usaha Bank;
2. Menjamin tersedianya laporan yang akurat;
3. Meningkatkan kepatuhan terhadap ketentuan yang berlaku;
4. Mengurangi dampak kerugian keuangan, penyimpangan termasuk kecurangan (*fraud*) dan pelanggaran;
5. Meningkatkan efektivitas organisasi dan meningkatkan efisiensi biaya;
6. Mengelola risiko agar tetap dalam batas toleransi (*risk tolerance*) dan *risk appetite* sesuai ukuran dan kompleksitas usaha;
7. Melakukan pengujian dan mengkaji ulang terhadap sistem informasi manajemen risiko;
8. Memverifikasi dan mengkaji ulang secara berkala dan berkesinambungan terhadap permasalahan yang bersifat material dan tindakan untuk memperbaiki permasalahan yang terjadi; dan
9. Memberikan keyakinan yang memadai dalam rangka pencapaian tujuan Bank.

Evaluasi terhadap efektivitas penerapan sistem pengendalian internal dilakukan secara terus menerus dan berkesinambungan agar Bank dapat memantau dan memitigasi risiko-risiko yang dihadapi secara efektif. Hasil evaluasi tersebut dijadikan dasar untuk perbaikan dan penyempurnaan sistem ataupun kebijakan pengendalian internal.

Seluruh manajemen dan karyawan Bank Victoria memiliki peran dan tanggung jawab untuk menerapkan, mematuhi, serta meningkatkan sistem pengendalian internal di Bank Victoria. Hal ini tercermin dari konsep *three lines of defenses* dalam pengelolaan risiko yang telah diimplementasikan, di mana pengelolaan risiko dilakukan oleh seluruh lini organisasi.

## Strategi Penerapan Manajemen Risiko

Sejalan dengan Visi dan Misi, Bank merumuskan strategi manajemen risiko dengan mengembangkan transformasi digital dan tetap menjaga kinerja usaha bank yang secara

Realizing that risk management is the responsibility of all Risk-Taking Units, the success of such is determined by the risk awareness of all Risk-Taking Units equipped with adequate competencies.

The risk management information system is developed in accordance with the Bank's needs in order to implement effective risk management. The risk management information system and the information generated are adapted to the characteristics and complexity of the Bank's business activities, as well as adaptive to changes.

### Internal Control System on Risk Management Implementation

The internal control system is a the Bank's monitoring process mechanism to:

1. Managing and controlling the risks inherent in the Bank's business activities;
2. Ensure the availability of accurate reports;
3. Improve compliance with the applicable regulations;
4. Reduce the impact of financial loss, irregularities including fraud and violation;
5. Improve organization effectiveness and improve cost efficiency;
6. Manage risk in order to remain within the limits of risk tolerance and risk appetite according to the business size and complexity;
7. Conducting testing and reviewing the risk management information system;
8. Verifying and reviewing regularly and continuously on material problems and taking actions to correct problems that occur; and
9. Providing adequate confidence for the purpose of achieving the Bank's objectives.

Evaluation of the effectiveness of internal control system is performed continuously and ongoing so that the Bank can monitor and mitigate the risks effectively. Such evaluation result is used as a basis for improving and refining the system and internal control policy.

All management and employees of Bank Victoria have the role and responsibility to implement, comply with, and improve the internal control system at Bank Victoria. This is reflected in the concept of three lines of defenses in risk management that has been implemented, where risk management is carried out by all lines of the organization.

## Risk Management Implementation Strategy

In line with the Vision and Mission, the Bank formulates a risk management strategy by developing digital transformation and maintaining the Bank's business performance, which

umum tertuang dalam Rencana Bisnis Bank dan telah disetujui oleh Manajemen Bank dengan memperhatikan *risk appetite* dan *risk tolerance*. Strategi manajemen risiko disusun untuk memastikan bahwa eksposur risiko Bank berada pada atau di bawah tingkat eksposur risiko yang ditetapkan sesuai dengan kebijakan, prosedur internal Bank, serta peraturan perundang-undangan dan ketentuan lain yang berlaku.

Penerapan strategi manajemen risiko dilakukan untuk mendukung pencapaian Rencana Bisnis Bank, di antaranya melalui:

1. Peningkatan pengelolaan risiko Bank yang berkualitas;
2. Penyempurnaan kebijakan atas penerapan manajemen risiko Bank; dan
3. Proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko di setiap jenjang organisasi.

Strategi pengelolaan risiko senantiasa dilakukan Bank, baik dari segi struktur organisasi dan sumber daya manusia, kebijakan dan prosedur, maupun sistem pendukung agar sesuai dengan perkembangan aktivitas perbankan yang semakin beragam dan kompleks. Usaha tersebut dilakukan Bank agar dapat mengelola risiko yang dihadapi, melakukan upaya pencegahan atau mitigasi, serta mencadangkan modal sehingga membantu Bank dalam merencanakan arah pertumbuhan bisnis di masa depan. Perbaikan dan peningkatan pengelolaan dilakukan melalui:

1. Menjaga eksposur risiko secara keseluruhan (*aggregate*) maupun per jenis risiko dengan mempertimbangkan keterkaitan antar risiko;
2. Evaluasi dan penyempurnaan pengukuran risiko secara berkala atau sewaktu-waktu apabila diperlukan untuk memastikan kesesuaian akurasi, kewajaran, serta prosedur yang digunakan untuk mengukur risiko; dan
3. Analisa dan evaluasi kecenderungan terhadap perubahan faktor-faktor yang mempengaruhi kinerja Bank, baik faktor internal maupun eksternal.

Pada prinsipnya, pengelolaan risiko dilakukan secara proaktif guna mencapai pertumbuhan kinerja keuangan maupun kelangsungan bisnis Bank yang sehat dan berkelanjutan serta memelihara tingkat *risk adjusted return* secara optimal sesuai dengan *risk appetite* yang ditetapkan.

## Struktur Tata Kelola Risiko

Penerapan manajemen risiko bermanfaat untuk melakukan analisis terhadap risiko atau kemungkinan adanya risiko yang akan dihadapi saat ini maupun yang akan datang. Dalam praktiknya, Bank secara berkala melakukan kaji ulang melalui evaluasi kepada unit kerja. Evaluasi dilakukan dengan tujuan agar Bank mampu mengidentifikasi setiap risiko yang berpotensi muncul dan berdampak signifikan. Proses evaluasi pelaksanaan manajemen risiko menggunakan pendekatan berbasis risiko dan dilakukan oleh Divisi *Risk Management/Integrated*, bekerja sama dengan seluruh unit kerja.

is generally stated in the Bank's Business Plan and has been approved by the Bank Management by considering the risk appetite and risk tolerance. The risk management strategy is established to ensure that the Bank's risk exposure is at or below the level of risk exposure established in accordance with the Bank's internal policies and procedures, as well as other applicable laws and regulations.

Implementation of risk management strategy is conducted to support the achievement of the Bank's Business Plan, among others through:

1. Improving the Bank's risk management quality;
2. Improvement of Bank risk management implementation policies; and
3. The process of identifying, measuring, monitoring, and controlling risks at every level of the organization.

The Bank constantly performs risk management strategy, either on the organizational structure and human resources, policy and procedure, or on the supporting system to be in line with the development of banking's activities that are more various and complex. The effort is made by the Bank in order to manage the risks, to prevent and mitigate, and to reserve capital to assist the Bank in planning the future direction of the business growth. Improvement and refinement of risk management are conducted as follows:

1. Maintaining an aggregate risk exposure or per type of risk by considering the interrelationships among the risks;
2. Evaluating and refining the risk measurement on a regular basis or at any time as necessary to ensure conformity of accuracy, reasonableness, and procedures used to measure risks; and
3. Analyzing and evaluating trends towards changes in factors affecting the Bank's performance, both internal and external factors.

In principle, risk management is carried out proactively in order to achieve sound and sustainable growth in financial performance and business continuity of the Bank and to maintain an optimal level of risk adjusted return in accordance with the established risk appetite.

## Risk Governance Structure

Risk management is useful to analyze the risks or possible risks that may be faced in the present or future. In practice, the Bank periodically reviews by evaluating the work units. The evaluation is conducted with the aim of enabling the Bank to identify any potential risks that may arise and have a significant impact. Risk management evaluation process uses risk-based approach and is performed by Risk Management/Integrated Division, in coordination with all the work units.



Secara internal, efektivitas penerapan manajemen risiko juga didukung oleh unit independen lainnya seperti *Compliance/Integrated, AML, & System Procedure Division, SKAI/Integrated & Anti Fraud Division* dan Komite Pendukung. Dalam hal ini, *Compliance/Integrated, AML, & System Procedure Division* melakukan fungsinya untuk memastikan kebijakan dan penerapan manajemen risiko telah sesuai ketentuan yang berlaku.

Sementara itu, Divisi *SKAI/Integrated & Anti Fraud* secara rutin melakukan peninjauan ulang dan audit terhadap penerapan manajemen risiko Bank berdasarkan *risk-based* audit dengan tujuan sebagai pengendalian internal serta perbaikan penerapan manajemen risiko secara terus menerus. Adapun evaluasi efektivitas sistem manajemen risiko secara eksternal dilakukan oleh auditor eksternal maupun regulator.

Komite-Komite Pendukung atau Komite yang membantu Dewan Komisaris seperti di antaranya Komite Pemantau Risiko melakukan evaluasi terhadap kebijakan dan pengawasan, memberi masukan dan rekomendasi kepada Dewan Komisaris dalam rangka fungsi pengawasan, serta melakukan perbaikan atau penyempurnaan pelaksanaan manajemen risiko berdasarkan hasil evaluasi pelaksanaan manajemen risiko.

Evaluasi penerapan manajemen risiko ditinjau dan dikomunikasikan melalui rapat-rapat secara berkala seperti melalui rapat Komite Manajemen Risiko.

## Stress Test

Bank secara berkala melakukan *stress test* guna mengetahui dampak dari implementasi kebijakan dan strategi manajemen risiko terhadap kinerja atau aktivitas fungsional Bank, dengan skenario spesifik dan/atau skenario pasar maupun secara skenario gabungan antara skenario spesifik dan skenario pasar. *Stress testing* dapat dilakukan lebih sering jika bank menganggap kondisi krisis yang terjadi bank dapat terekspos risiko.

*Stress test* secara spesifik menggunakan asumsi dari internal Bank, seperti penarikan dana besar-besaran atau penurunan kualitas kredit. Sedangkan, skenario pada pasar menggunakan asumsi perubahan kondisi ekonomi mikro maupun makro. *Stress testing* dilakukan dengan skenario yang bersifat historis dan/atau hipotesis dengan mempertimbangkan aktivitas bisnis dan kerentanan Bank. *Stress test* dilakukan untuk melihat dampak kinerja usaha dan kecukupan modal bank.

## Struktur Organisasi Manajemen Risiko

Bank Victoria memiliki struktur organisasi manajemen risiko yang memadai untuk mendukung penerapan manajemen risiko. Struktur organisasi manajemen risiko Bank dijelaskan sebagai berikut.

1. Komite Pemantau Risiko sebagai organ yang membantu Dewan Komisaris, seperti dalam rangka mengevaluasi pelaksanaan kebijakan manajemen risiko di tingkat eksekutif;

Internally, the effectiveness of risk management implementation is also supported by other independent units such as the *Compliance/Integrated, AML, & System Procedure Division, SKAI/Integrated & Anti Fraud Division*, and the Supporting Committee. In this matter, the *Compliance/Integrated, AML, & System Procedure Division* performs its function to ensure that risk management policies and implementation are in accordance with the applicable regulations.

Whereas, the *SKAI/Integrated & Anti Fraud Division* regularly reviews and audits the Bank's risk management implementation on a *risk-based* audit principle with the objective as internal control and continuous improvement of risk management implementation. The external evaluation of risk management system effectiveness is carried out by external auditor or by the regulator.

The Supporting Committees or Committees assisting the Board of Commissioners, such as the Risk Monitoring Committee, evaluate the policies and supervision, provide input and recommendations to the Board of Commissioners in the framework of supervisory function, as well as improving and refining the risk management implementation based on its evaluation results.

Evaluation of risk management implementation is reviewed and communicated through regular meetings such as through the Risk Management Committee's meetings.

## Stress Test

The Bank periodically conducts stress tests to determine the impact of the implementation of risk management policies and strategies on the Bank's performance or functional activities, with specific scenarios and/or market scenarios as well as in a combined scenario between specific scenarios and market scenarios. Stress testing can be performed more frequently if the bank considers to be exposed to risks due to a crisis condition that occurs.

Stress test specifically uses assumptions from the Bank's internal, such as large-scale withdrawals or a decline in loan quality. Whereas, the market scenario uses the assumption of changes in micro and macro economic conditions. Stress testing is performed by the Bank with scenarios that are historical and/or hypothetical by considering the Bank's business activities and vulnerability. Stress test is conducted to see the impact on the Bank's business performance and capital adequacy.

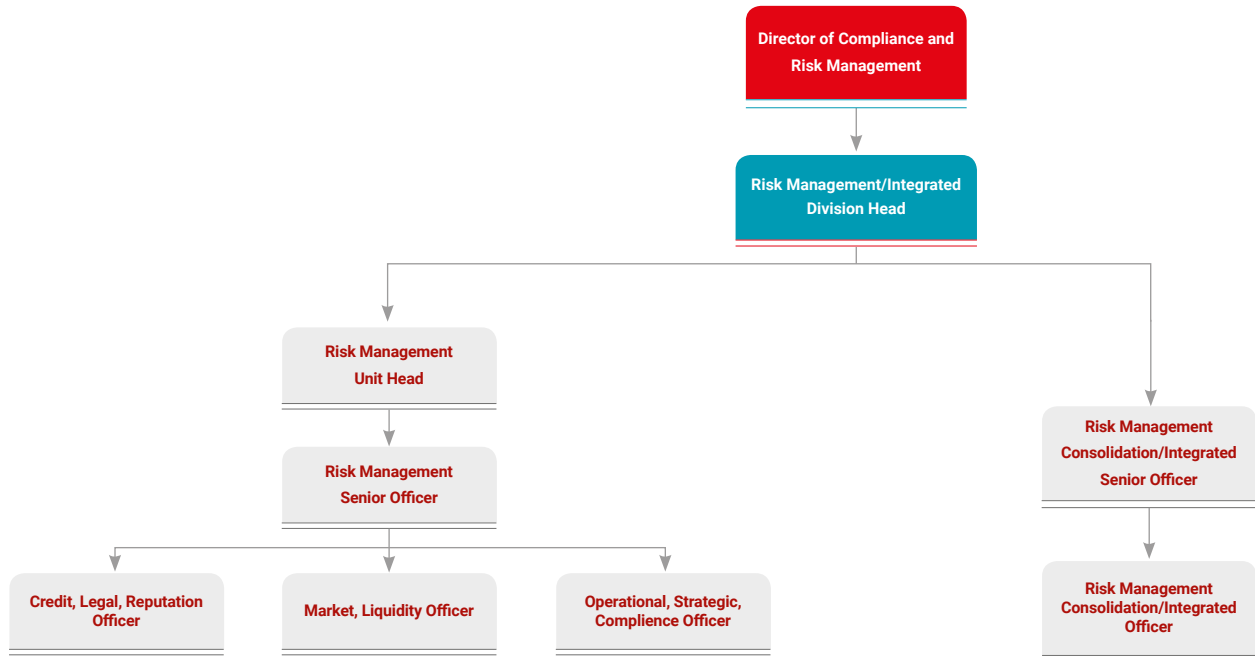
## Risk Management Organization Structure

Bank Victoria has an adequate risk management organizational structure to support the implementation of risk management. The Bank's risk management organizational structure is as follows.

1. The Risk Monitoring Committee is an organ that assists the Board of Commissioners, for the purpose of evaluating the implementation of risk management policies at executive level;

2. Komite Manajemen Risiko merupakan komite eksekutif di bawah Direksi; dan
3. Divisi *Risk Management/Integrated* merupakan satuan kerja independen terhadap satuan kerja operasional (*Risk Taking Unit*) dan satuan kerja yang melaksanakan fungsi pengendalian internal yang bertanggung jawab kepada Direktur yang membawahi manajemen risiko.

2. The Risk Management Committee, which is an executive committee under the Board of Directors; and
3. The Risk Management/Integrated Division is an independent work unit against the operational work unit (*Risk Taking Unit*) and a work unit that performs internal control function responsible to the Director in charge of risk management.



Keterangan / Remarks :

— : Garis Komando / Commanding Line

### Komite Pemantau Risiko

Uraian terkait Komite Pemantau Risiko dapat dilihat pada bab Tata Kelola Perusahaan dalam Laporan Tahunan ini.

### Komite Manajemen Risiko

Uraian terkait Komite Manajemen Risiko dapat dilihat pada bab Tata Kelola Perusahaan dalam Laporan Tahunan ini.

### Divisi *Risk Management/Integrated*

Divisi *Risk Management/Integrated* merupakan satuan kerja independen terhadap satuan kerja bisnis/operasional dan satuan kerja yang melaksanakan fungsi pengendalian internal. Divisi *Risk Management/Integrated* dipimpin oleh seorang Kepala Divisi dan bertanggung jawab langsung kepada Direktur Kepatuhan dan Manajemen Risiko.

Divisi *Risk Management/Integrated* bekerja sama dengan seluruh unit bisnis dan unit pendukung untuk membangun proses secara komprehensif dalam identifikasi, pengukuran, pemantauan, pengendalian risiko dan sistem informasi, serta sistem pengendalian internal yang menyeluruh. Dengan kebijakan manajemen risiko yang berjalan efektif, Divisi *Risk Management/Integrated* menjadi mitra strategis dari unit-unit bisnis guna mengoptimalkan pendapatan dan meminimalisir

### Risk Monitoring Committee

Description of the Risk Monitoring Committee can be seen in the Corporate Governance chapter of this Annual Report.

### Risk Management Committee

Description of the Risk Management Committee can be seen in the Corporate Governance chapter of this Annual Report.

### Risk Management/Integrated Division

The Risk Management/Integrated Division is an independent work unit against business/operational work units and a work unit performing internal control functions. The Risk Management/Integrated Division is led by a Division Head who is directly responsible to the Director of Compliance and Risk Management.

The Risk Management/Integrated Division partners with all business units and supporting units to build a comprehensive process of identification, measurement, monitoring, control of risk and information systems, as well as a comprehensive internal control system. With an effective risk management policy, the Risk Management/Integrated Division becomes a strategic partner of the business units to optimize revenue and minimize potential losses from the Bank's operational

potensi kerugian dari aktivitas fungsional operasional Bank. Untuk memastikan efektivitas dan kecukupan sistem manajemen risiko Bank, Divisi *Risk Management/Integrated* secara berkesinambungan terus melakukan pengelolaan risiko Bank dan melakukan tinjauan ulang secara berkala.

**Tugas dan Tanggung Jawab Divisi *Risk Management/Integrated***

Tugas dan tanggung jawab Divisi *Risk Management/Integrated* meliputi:

functional activities. To ensure the effectiveness and adequacy of the Bank’s risk management system, the Risk Management/Integrated Division continuously manages the Bank’s risk by conducting periodic reassessment.

**Duties and Responsibilities of the Risk Management/Integrated Division**

Duties and responsibilities of the Risk Management/Integrated Division include:

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
<p>Pemantauan pelaksanaan strategi manajemen risiko yang telah disetujui oleh Direksi. Monitoring the implementation of risk management strategy that has been approved by the Board of Directors.</p>	<p>Memantau kebijakan dan strategi manajemen risiko yang telah disetujui Direksi, di antaranya eksposur risiko secara keseluruhan (<i>composite</i>), per jenis risiko, maupun per aktivitas fungsional dan kepatuhan terhadap toleransi risiko dan limit yang ditetapkan, seperti tercermin dari Laporan Profil Risiko dan dampak Covid-19 terhadap operasional Bank. Monitoring risk management policy and strategy that have been approved by the Board of Directors, among others the overall risk exposure (<i>composite</i>), per type of risk, per functional activity, and their compliance with the established risk tolerance and limit, as reflected in the Risk Profile Report, as well as the impact of Covid-19 on the Bank’s operations.</p>
<p>Kaji ulang secara berkala terhadap proses manajemen risiko. Periodically reviewing the risk management process.</p>	<p>Kaji ulang dilakukan paling sedikit 1 (satu) kali dalam 1 (satu) tahun atau frekuensi yang lebih tinggi dalam hal terdapat perubahan faktor-faktor yang mempengaruhi kegiatan usaha Bank secara signifikan. Divisi <i>Risk Management/Integrated</i> telah melakukan kaji ulang seperti di antaranya: 1. Profil risiko, faktor rentabilitas, dan faktor permodalan; serta 2. Eksposur risiko yang melekat pada Satuan Kerja Operasional. Untuk memastikan: 1. Kecukupan kerangka manajemen risiko; 2. Keakuratan metodologi penilaian risiko; dan 3. Kecukupan sistem informasi manajemen risiko. Review is carried out at least 1 (one) time in 1 (one) year or at a higher frequency in the event of significant changes in factors affecting the Bank’s business activities. The Risk Management/Integrated Division has conducted reviews such as: 1. Risk profile, profitability factor, and capital factor; and 2. Risk exposure inherent in the Operational Work Unit. Ensuring: 1. Adequacy of risk management framework; 2. Accuracy of risk assessment methodology; and 3. Adequacy of risk management information system.</p>
<p>Pemantauan posisi risiko secara keseluruhan (<i>composite</i>), per jenis risiko, dan per jenis aktivitas fungsional serta melakukan <i>stress testing</i>. Monitoring the overall risk position (<i>composite</i>), per type of risks, and per type of functional activity, as well as performing stress testing.</p>	<p>Divisi <i>Risk Management/Integrated</i> telah memantau eksposur risiko dan kepatuhan terhadap toleransi risiko dan limit yang ditetapkan, di antaranya melalui laporan maupun Komite Manajemen Risiko, serta melakukan <i>stress testing</i> baik dengan skenario spesifik maupun skenario pasar, di antaranya risiko kredit, risiko pasar, dan risiko likuiditas untuk mengetahui dampaknya terhadap strategi manajemen dan kecukupan modal. The Risk Management/Integrated Division has monitored risk exposure and compliance with the established risk tolerance and limit, among others through reports and the Risk Management Committee, and conducting stress testing using specific scenario and market scenario, among others credit risk, market risk, and liquidity risk to determine their impact on the management strategy and capital adequacy.</p>
<p>Pengkajian usulan aktivitas dan/atau produk baru. Reviewing proposals of new activity and/or product.</p>	<p>Divisi <i>Risk Management/Integrated</i> mengkaji usulan terkait aktivitas dan/atau produk baru yang dikembangkan oleh <i>Risk Taking Unit</i>, di antaranya: 1. Kajian Rencana Aktivitas Pemasaran Reksa Dana – Lancar Victoria Merkurius; 2. Kajian <i>Bancassurance</i> PT Allianz Life Indonesia; 3. Kajian Rencana Produk/Aktivitas Layanan Baru <i>Digital Onboarding</i>; dan 4. Kajian Pengembangan <i>Internet Banking</i> dan <i>Mobile Banking</i> (IBMB). Pengkajian difokuskan terutama pada aspek kemampuan untuk mengelola aktivitas dan/atau produk baru, termasuk kelengkapan sistem dan prosedur yang digunakan, serta dampaknya terhadap eksposur risiko secara keseluruhan.</p>

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	<p>The Risk Management/Integrated Division reviews proposals related to new activities and/or products developed by the Risk-Taking Unit, among others:</p> <ol style="list-style-type: none"> <li>1. Review of Mutual Fund Marketing Activity Plan – Lancar Victoria Merkurius;</li> <li>2. Review of Bancassurance of PT Allianz Life Indonesia;</li> <li>3. Review of Product/Activity Plan for Varu Digital Onboarding Services; and</li> <li>4. Review of Internet Banking and Mobile Banking (IBMB) Development.</li> </ol> <p>The review focuses mainly on aspect of ability to manage new activity and/or product, including the completeness of system and procedure used, as well as the impact on the overall risk exposure.</p>
<p>Memberikan rekomendasi kepada Satuan Kerja Operasional (<i>Risk Taking Unit</i>) dan/atau kepada Komite Manajemen Risiko sesuai kewenangan yang dimiliki, antara lain memuat rekomendasi yang terkait dengan besaran atau maksimum eksposur risiko yang wajib dipelihara oleh Bank.</p> <p>Providing recommendation to the Operational Work Unit (<i>Risk-Taking Unit</i>) and/or to the Risk Management Committee, in accordance with the authority, among others include recommendations related to the amount or maximum risk exposure that must be maintained by the Bank.</p>	<p>Sepanjang tahun 2021, Divisi <i>Risk Management/Integrated</i> telah memberikan rekomendasi, di antaranya:</p> <ol style="list-style-type: none"> <li>1. Hasil evaluasi profil risiko individual/konsolidasi dan kerangka manajemen risiko;</li> <li>2. Kajian kredit dan limit kredit;</li> <li>3. <i>Limit Earning at Risk</i> (EaR); dan</li> <li>4. <i>Peer group Bank</i>.</li> </ol> <p>In 2021, the Risk Management/Integrated Division provided recommendations, among others:</p> <ol style="list-style-type: none"> <li>1. The evaluation results of individual/consolidated risk profile and risk management framework;</li> <li>2. Review of credit and credit limits;</li> <li>3. Limit of Earning at Risk (EaR); and</li> <li>4. The Bank's peer group.</li> </ol>
<p>Menyusun dan menyampaikan laporan profil risiko kepada Direktur Utama atau Direktur yang ditugaskan secara khusus, juga kepada Komite Manajemen Risiko secara berkala.</p> <p>Preparing and delivering the Risk Profile Report to the President Director or Director specifically in charge of, and also the Risk Management Committee periodically.</p>	<p>Divisi <i>Risk Management/Integrated</i> telah menyusun dan menyampaikan Laporan Profil Risiko sesuai peraturan yang berlaku, baik kepada pihak eksternal maupun internal, yaitu kepada Direktur Utama, Direktur Manajemen Risiko dan Kepatuhan, Komite Manajemen Risiko, serta Otoritas Pengawas Bank secara berkala.</p> <p>The Risk Management/Integrated Division has prepared and submitted the Risk Profile Report in accordance with the applicable regulations, to external and internal parties, which are the President Director, Director of Risk Management and Compliance, Risk Management Committee, and the Bank's Supervisory Authority on a regular basis.</p>
<p>Evaluasi terhadap akurasi validitas data yang digunakan dalam mengukur risiko untuk keperluan intern.</p> <p>Evaluation of the data validity accuracy used in measuring risk for internal purposes.</p>	<p>Divisi <i>Risk Management/Integrated</i> telah melakukan evaluasi terhadap data yang disampaikan <i>Risk Taking Unit</i> untuk memastikan akurasi dan/atau validasi data yang digunakan untuk mengukur eksposur risiko, di antaranya:</p> <ol style="list-style-type: none"> <li>1. Kinerja keuangan;</li> <li>2. Evaluasi metodologi dan kecukupan <i>expected credit loss</i> Bank; dan</li> <li>3. Laporan-laporan aktivitas fungsional pada 8 (delapan) risiko Bank.</li> </ol> <p>The Risk Management/Integrated Division has evaluated the data submitted by the Risk-Taking Unit to ensure the accuracy and/or validation of the data used to measure risk exposures, among others:</p> <ol style="list-style-type: none"> <li>1. Financial performance;</li> <li>2. Evaluation of the methodology and adequacy of the Bank's expected credit loss; and</li> <li>3. Functional activity reports on 8 (eight) Bank risks.</li> </ol>

### Sertifikasi Manajemen Risiko

Pada tahun 2021, Bank telah mengikutsertakan Dewan Komisaris, Direksi, Pejabat Eksekutif, dan karyawan dalam program sertifikasi manajemen risiko. Selain itu, Bank juga memberikan pelatihan penyegaran (*refreshment training*) terhadap pihak yang telah lulus program sertifikasi manajemen risiko. Berikut informasi terkait sertifikasi manajemen risiko.

### Risk Management Certification

In 2021, the Bank registered the Board of Commissioners, Board of Directors, Executive Officers, and employees in a risk management certification program. Furthermore, the Bank also conducted refreshment training for all parties who have passed the risk management certification program. Below the information related to the risk management certification.

Level	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	Pejabat Eksekutif Executive Officers	Lain-Lain Others	Total
I	-	-	1	139	140
II	1	-	3	70	74
III	-	-	12	25	37
IV	-	-	12	2	14
V	2	5	1	-	8
Total	3	5	29	236	273

## Pengungkapan Eksposur Risiko

Bank menyadari bahwa risiko akan berdampak pada kegiatan operasional dan usaha Bank, serta bagi para pemangku kepentingan. Bank telah mengimplementasikan sistem manajemen risiko yang komprehensif dalam menjalankan kegiatan operasional dan usahanya. Komponen penting dalam proses manajemen risiko ini adalah identifikasi, pengukuran, pemantauan, pengendalian, dan sistem informasi manajemen risiko. Proses manajemen risiko tersebut dilakukan dan disesuaikan dengan kompleksitas dan usaha Bank. Dalam pengimplementasian proses manajemen risiko tersebut, Bank fokus pada kualitas penerapan manajemen risiko yang merupakan bagian dari sistem pengendalian risiko yang terdiri dari tata kelola risiko, kerangka manajemen risiko, proses manajemen risiko, sumber daya manusia, sistem informasi manajemen risiko, dan pengendalian risiko.

### Risiko Kredit

Risiko kredit adalah risiko yang terjadi akibat kegagalan debitur dan/atau pihak lawan (*counterparty*) dalam memenuhi kewajibannya.

Tujuan dari manajemen risiko kredit adalah untuk memastikan aktivitas penyediaan dana Bank tidak terekspos pada risiko kredit yang dapat menimbulkan kerugian pada Bank.

#### Penerapan Manajemen Risiko Kredit

##### 1. Organisasi Manajemen Risiko Kredit

Bank Victoria mengembangkan proses manajemen risiko kredit yang terstruktur guna mendukung prinsip perkreditan yang baik dengan pengendalian internal yang kuat, sebagai berikut.

- a. Dewan Komisaris, menyetujui rencana kredit tahunan Bank dan mengawasi pelaksanaannya, menyetujui Kebijakan Perkreditan Bank, meminta penjelasan dan tanggung jawab kepada Direksi jika dalam pelaksanaan pemberian kredit terdapat penyimpangan dari kebijakan yang telah ditetapkan;
- b. Direksi, bertanggung jawab atas penyusunan rencana dan kebijakan perkreditan, memastikan kepatuhan Bank terhadap ketentuan perundang-undangan dan peraturan yang berlaku di bidang perkreditan dan kebijakan perkreditan, serta melaporkan kepada Dewan Komisaris mengenai hal-hal seperti pelaksanaan rencana perkreditan, penyimpangan dalam pelaksanaan pemberian kredit, perkembangan kualitas portofolio kredit dan kredit dalam pengawasan khusus atau bermasalah;
- c. Divisi Bisnis adalah unit bisnis yang memberikan usulan dan menjalankan aktivitas pemberian kredit atau penyediaan dana dan melaksanakan pengawasan debitur dalam perhatian khusus;
- d. Divisi *Credit Risk Review* adalah unit yang melakukan analisa dan evaluasi terhadap memorandum analisa kredit dan membuat rekomendasi terhadap proposal yang diusulkan oleh Divisi Bisnis;

## Disclosure of Risk Exposure

The Bank recognizes that risks will affect the Bank's operational and business activities, as well as its stakeholders. The Bank has implemented a comprehensive risk management system in carrying out its operational and business activities. The important components of this risk management process are the risk identification, measurement, monitoring, control, and the risk management information system. This risk management process is carried out and adapted to the Bank's complexity and business. In implementing the risk management process, the Bank focuses on the quality of risk management implementation which is part of the risk control system consisting of risk governance, risk management framework, risk management process, human resources, risk management information system, and risk control.

### Credit Risk

Credit risk is the risk occurred due to the failure of debtors and/or counterparties in meeting their obligations.

The purpose of credit risk management is to ensure that the activity of providing Bank funds is not exposed to credit risk that can cause losses to the Bank.

#### Credit Risk Management Implementation

##### 1. Credit Risk Management Organization

Bank Victoria develops a structured credit risk management process in order to support strong credit principles with strong internal control as follows.

- a. The Board of Commissioners approves the Bank's annual credit plan and supervises its implementation, approves the Bank's Credit Policy, asks for explanation and accountability from the Board of Directors if there is a deviation from the stipulated policy in the provision of credit;
- b. The Board of Directors is responsible for preparing credit plans and policies, ensuring the Bank's compliance with the laws and regulations applicable in credit sector and credit policies, and reporting to the Board of Commissioners on matters such as credit plan implementation, irregularities in the implementation of credit extension, development of credit and credit portfolio quality under special mention or non-performing;
- c. Business Division is a business unit proposing and implementing loan distribution activity or provision of funds and supervising debtors under special mention;
- d. Credit Risk Review Division is a unit that performs analysis and evaluation of credit analysis memorandum and makes recommendations to proposals proposed by the Business Division;

- e. Divisi *Loan & Trade Operations* yang bertanggung jawab atas operasional perkreditan;
- f. *Credit Legal Unit* yang bertanggung jawab atas keabsahan dokumen dan legalitas agunan;
- g. Divisi *Corporate Legal* sebagai pemberi opini dan *me-review* standar baku perjanjian kredit;
- h. Divisi *Special Asset Management* berfungsi untuk melakukan penanganan debitur bermasalah dan penyelesaian aset bermasalah, serta restrukturisasi kredit bermasalah;
- i. Divisi *Compliance, Anti-Money Laundering (AML)/Integrated and System Procedure* berfungsi untuk menjaga kepatuhan Bank dalam penyediaan dana; dan
- j. Divisi *Risk Management/Integrated* melakukan pemantauan terhadap risiko yang melekat pada manajemen risiko kredit dan *stress test* untuk melihat dampak aktivitas perkreditan terhadap kecukupan modal bank.

Selain itu, Bank juga memiliki komite-komite untuk membantu Direksi dalam proses perkreditan, yaitu:

- a. Komite Kredit, suatu Komite pemegang kewenangan kredit/pemegang kewenangan untuk melakukan keputusan kredit termasuk restrukturisasi kredit; dan
- b. Komite Kebijakan Perkreditan memiliki fungsi pokok untuk memberikan masukan atas kebijakan perkreditan, mengawasi penerapan atas kebijakan agar berjalan konsisten dan menetapkan hal-hal yang terkait dengan keputusan bisnis yang bersifat *irregularities*.

## 2. Strategi Manajemen Risiko untuk Aktivitas yang Memiliki Eksposur Risiko Kredit yang Signifikan

Bank merumuskan strategi manajemen risiko disesuaikan strategi bisnis secara keseluruhan dengan memperhatikan *risk appetite* dan *risk tolerance*. Strategi manajemen risiko disusun untuk memastikan bahwa eksposur risiko dikelola secara terkendali sesuai dengan kebijakan kredit, prosedur internal, peraturan dan perundang-undangan, serta ketentuan lain yang berlaku.

Strategi manajemen risiko untuk aktivitas yang memiliki eksposur risiko kredit telah disusun dan ditetapkan oleh Bank dengan mempertimbangkan:

- a. Ketentuan regulator dan Rencana Bisnis Bank;
- b. Pertumbuhan ekonomi disesuaikan dengan perkiraan pertumbuhan ekonomi makro;
- c. Proyeksi pertumbuhan kredit industri perbankan; dan
- d. Prinsip kehati-hatian serta prinsip perbankan yang sehat dalam penyaluran kredit.

## 3. Kebijakan Pengelolaan Risiko Konsentrasi Kredit

Bank mengelola risiko konsentrasi kredit dan/atau dengan melakukan diversifikasi portofolio kredit dan penyebaran risiko yang timbul dari berbagai sektor industri atau sektor

- e. *Loan & Trade Operations Division* is a unit responsible for credit operations;
- f. *Credit Legal Unit* responsible for document validity and collateral legality;
- g. *Corporate Legal Division* is a unit that provides opinions and reviews loan agreement standards;
- h. *Special Asset Management Division* serves to handle nonperforming debtors and settlement of nonperforming assets, and restructuring of nonperforming loans;
- i. *Compliance, Anti-Money Laundering (AML)/Integrated and System Procedure Division* serves to maintain the Bank's compliance on the provision of funds; and
- j. The *Risk Management/Integrated Division* monitors the risks inherent in credit risk management and stress tests to see the impact of credit activities on the Bank's capital adequacy.

In addition, the Bank also has Committees to assist the Board of Directors in the credit process, which are:

- a. *Credit Committee*, a Committee holding credit authority/authority holder to make credit decision, including credit restructuring; and
- b. *Credit Policy Committee*, a Committee whose main function is to provide input on credit policies, supervise the implementation of policies so that they run consistently and determine matters related to business decisions that are irregular.

## 2. Risk Management Strategy for Activities with Significant Credit Risk Exposure

The Bank formulates a risk management strategy according to the overall business strategy with respect to the risk appetite and risk tolerance. The risk management strategy is prepared to ensure that the risk exposure is managed in control according to the credit policies, internal procedures, the prevailing laws and regulations, and other applicable provisions.

The risk management strategy for activities with credit risk exposure has been prepared and stipulated by the Bank under the following considerations:

- a. Regulatory provisions and the Bank's Business Plan;
- b. Economic growth which is adjusted to macroeconomic growth estimates;
- c. Projected loan growth of banking industry; and
- d. Prudential principles and sound banking principles in lending.

## 3. Credit Concentration Risk Management Policy

The Bank manages the credit concentration risk by diversifying its credit portfolio and spreading the risks arising from various industrial sectors or economic



ekonomi. Terkait hal ini, Bank melakukan:

- a. Penetapan limit berdasarkan sektor ekonomi atas analisa makro ekonomi dan karakteristik Bank yang dituangkan dalam Rencana Bisnis Bank;
- b. Analisa risiko konsentrasi kredit dilakukan sesuai portofolio yang dikelola Bank dengan mempertimbangkan berbagai dampak perubahan dari indikator ekonomi yang dapat mempengaruhi pemberian kredit pada sektor ekonomi tertentu; dan
- c. Analisa pergerakan *non-performing loan* (NPL) pada tiap sektor bisnis dan industri.

#### 4. Pengukuran dan Pengendalian Risiko Kredit

Pengukuran dan pengendalian risiko kredit seperti:

- a. Pengelolaan risiko kredit yang dilakukan oleh Bank secara terus-menerus dan berkesinambungan melalui pengkinian kebijakan, sistem, dan prosedur mengenai penyediaan dana secara berkala, limit kredit per sektor, kualitas kredit secara keseluruhan maupun per sektor, dan penyelamatan/penyelesaian kredit bagi debitur yang bermasalah;
- b. Pemisahan wewenang dan tanggung jawab dalam rangka pengendalian risiko kredit; dan
- c. *Stress testing* risiko kredit untuk menilai ketahanan modal Bank dalam menghadapi penurunan kualitas kredit debitur.

#### 5. Tagihan yang Jatuh Tempo dan Tagihan yang Mengalami Penurunan Nilai/*Impairment*

Bank menerapkan kebijakan tentang tagihan yang jatuh tempo dan tagihan yang mengalami penurunan nilai atau *impairment*, yang meliputi:

- a. Tagihan yang telah jatuh tempo, merupakan tagihan yang telah jatuh tempo lebih dari 90 hari, baik atas pembayaran pokok dan/atau pembayaran bunga; dan
- b. Tagihan yang mengalami penurunan nilai, yaitu suatu kondisi dimana terdapat bukti objektif terjadinya peristiwa yang merugikan sebagai akibat dari satu atau lebih peristiwa yang terjadi setelah pengakuan awal kredit tersebut, dan peristiwa yang merugikan tersebut berdampak pada estimasi arus kas masa datang atas aset keuangan atau kelompok aset keuangan yang dapat diestimasi secara handal.

#### 6. Pendekatan yang Digunakan dalam Pembentukan CKPN

Dalam mengestimasi cadangan kerugian penurunan nilai atas aset keuangan, Bank telah menerapkan PSAK 71 sejak 1 Januari 2020. Dalam PSAK 71 ini memperkenalkan metode kerugian kredit ekspektasian dalam mengukur kerugian instrumen keuangan akibat penurunan nilai instrumen keuangan yang merupakan konvergensi IFRS 9 – *Financial Instrument* di Indonesia, dimana dalam PSAK 71 menggunakan prinsip *Forward-Looking Expected Credit Loss* (ECL).

sectors. Regarding this matter, the Bank conducts:

- a. Determination of limit based on the economic sector of the macroeconomic analysis and the Bank's characteristics set forth in the Bank's Business Plan;
- b. The credit concentration risk analysis is conducted according to the portfolio managed by the Bank by considering the various impacts of changes of economic indicators that may affect lending on certain economic sectors; and
- c. Analysis of the movement of non-performing loans (NPL) in each business and industry sector.

#### 4. Credit Risk Measurement and Control

Credit risk measurement and control is such as:

- a. Continuous and sustainable management of credit risk by the Bank through regularly updating the policies, systems, and procedures on the provision of funds, credit limit per sector, credit quality as a whole and per sector, and credit rescue/settlement for non-performing debtors;
- b. Separating the authority and responsibility for credit risk control; and
- c. Stress testing of credit risk to assess the Bank's capital resilience in handling decreasing quality of debtors' credit.

#### 5. Matured Receivable and Impaired Receivable

The Bank implements policies on matured receivables and impaired receivables, which include:

- a. Matured receivable is a bill that has been overdue more than 90 days, either on the principal payment and/or interest payment; and
- b. Impaired receivable is a condition in which there is an objective evidence of an adverse event occurring as a result of one or more events occurring after the initial recognition of such credit, and such adverse event has an impact on the estimated future cash flow of a financial asset or group of financial assets that can be estimated reliably.

#### 6. Approach Used in the Formation of CKPN (Allowance for Impairment Losses)

In estimating allowance for impairment losses on financial assets, the Bank has implemented PSAK 71 since 1 January 2020. PSAK 71 introduces a method for the expected credit losses in measuring financial instrument losses due to impairment of financial instruments, which is the convergence of IFRS 9 - Financial Instruments in Indonesia, and in PSAK 71, the principle of Forward-Looking Expected Credit Loss (ECL) is used.



Permodelan parameter yang digunakan Bank seperti *Probability of Default* (PD), *Loss Given Default* (LGD), dan *Exposure at Default* (EAD) komponen perhitungan kerugian kredit ekspektasian.

Dalam menghitung kerugian kredit ekspektasian, Bank memperhitungkan pengaruh dari beberapa *macroeconomic forecast* di antaranya melalui perhitungan analisa statistik *moving average* dan *deseasonalised centered moving average* dalam permodelan *impairment* di PSAK 71.

CKPN dalam PSAK 71 memiliki 3 (tiga) *stages* berdasarkan tingkat risiko dari rendah hingga tinggi yang diklasifikasi sebagai berikut:

- a. *Stage 1 (performing)*. Tidak ada peningkatan risiko kredit dan aset keuangan. Contohnya, pinjaman yang tidak pernah terlambat dalam pembayaran. *Expected Credit Loss* (ECL) diperkirakan dalam waktu 12 bulan;
- b. *Stage 2 (under-performing)*. Risiko kredit dan aset keuangan meningkat signifikan. Contohnya, pinjaman yang telah terlambat dalam pembayaran lebih dari 30 hari, tapi belum masuk dalam kriteria *Stage 3*. *Expected Credit Loss* (ECL) diperkirakan hingga waktu jatuh tempo akhir (*lifetime*); dan
- c. *Stage 3 (non-performing)*. Kredit dan aset keuangan yang mengalami penurunan nilai dengan tajam disertai riwayat keterlambatan pembayaran. *Expected Credit Loss* (ECL) diakui hingga waktu jatuh tempo akhir (*lifetime*).

Terkait pengungkapan, Bank senantiasa menerapkan kebijakan dan mengedepankan prinsip kehati-hatian dalam mitigasi risiko kredit.

Dalam hal ini, Bank telah memuat informasi berikut dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko.

1. Tabel Pengungkapan Tagihan Bersih berdasarkan Wilayah Bank secara Individual dan secara Konsolidasi dengan Entitas Anak.
2. Tabel Pengungkapan Tagihan Bersih berdasarkan Sisa Jangka Waktu Kontrak Bank secara Individual dan secara Konsolidasi dengan Entitas Anak.
3. Tabel Pengungkapan Tagihan Bersih berdasarkan Sektor Ekonomi Bank secara Individual dan secara Konsolidasi dengan Entitas Anak.
4. Tabel Pengungkapan Tagihan dan Pencadangan berdasarkan Wilayah Bank secara Individual dan secara Konsolidasi dengan Entitas Anak.
5. Tabel Pengungkapan Tagihan dan Pencadangan berdasarkan Sektor Ekonomi Bank secara Individual dan secara Konsolidasi dengan Entitas Anak.
6. Tabel Pengungkapan Rincian Mutasi Cadangan Kerugian Penurunan Nilai Bank secara Individual dan secara Konsolidasi dengan Entitas Anak.

The modeling parameters used by the Bank include *Probability of Default* (PD), *Loss Given Default* (LGD), and *Exposure at Default* (EAD), components for calculating expected credit losses.

In calculating the expected credit losses, the Bank calculates the effects of several *macroeconomic forecasts*, among others, through the calculation of statistical analysis of *moving averages* and *deseasonalized centered moving averages* in the *impairment modeling* in PSAK 71.

CKPN in PSAK 71 has 3 (three) *stages* based on the level of risk from low to high which are classified as follows.

- a. *Stage 1 (performing)*. There is no increase in credit risk and financial assets. For example, a loan that is never late in payment. *Expected Credit Loss* (ECL) is estimated within 12 months;
- b. *Stage 2 (under-performing)*. Credit risk and financial assets have increased significantly. For example, a loan that is overdue by more than 30 days, but has not met the *Stage 3* criteria. *Expected Credit Loss* (ECL) is estimated up to the final maturity time (*lifetime*); and
- c. *Stage 3 (non-performing)*. Loans and financial assets that have experienced a sharp impairment accompanied by a history of late payments. *Expected Credit Loss* (ECL) is recognized up to the final maturity time (*lifetime*).

Regarding disclosure, the Bank continues to implement policies and prioritizes the principle of prudence in mitigating credit risk.

Regarding this matter, the Bank has included the following information in the Appendix on Quantitative Disclosure of Risk Exposure.

1. Table of Disclosure of Net Receivables by Area of the Bank, Individually and Consolidated with Subsidiaries.
2. Table of Disclosure of Net Receivables by Remaining Contract Period of the Bank, Individually and Consolidated with Subsidiaries.
3. Table of Disclosure of Net Receivables by Economic Sector of the Bank, Individually and Consolidated with Subsidiaries.
4. Table of Disclosure of Receivables and Allowances by Area of the Bank, Individually and Consolidated with Subsidiaries.
5. Table of Disclosure of Receivables and Allowances by Economic Sector of the Bank, Individually and Consolidated with Subsidiaries.
6. Table of Disclosure of Detailed Changes in Allowances for Impairment Losses of the Bank, Individually and Consolidated with Subsidiaries.

### Pengungkapan Eksposur Risiko Kredit

Pengungkapan risiko kredit dengan pendekatan standar (*standardized approach*) risiko kredit berpedoman pada Peraturan Otoritas Jasa Keuangan No. 34/POJK.03/2016 tentang Perubahan Atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 48/SEOJK.03/2017 tentang Pedoman Perhitungan Tagihan Bersih Transaksi Derivatif dalam Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar, dan Surat Edaran Otoritas Jasa Keuangan No. 11/SEOJK.03/2018 tentang Perubahan Atas Surat Edaran Otoritas Jasa Keuangan No. 42/SEOJK.03/2016 tentang Pedoman Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar.

#### 1. Kategori Portofolio yang Menggunakan Peringkat

Pengungkapan tagihan bersih berdasarkan kategori portofolio berdasarkan bobot risiko setelah memperhitungkan dampak mitigasi risiko kredit dan skala peringkat.

#### 2. Lembaga Pemeringkat yang Digunakan

Bank menggunakan peringkat yang diterbitkan oleh lembaga pemeringkat yang diakui sesuai dengan peraturan Otoritas Jasa Keuangan seperti diatur dalam Surat Edaran Otoritas Jasa Keuangan No. 37/SEOJK.03/2016 tentang Lembaga Pemeringkat dan Peringkat yang diakui Otoritas Jasa Keuangan, antara lain: Moody's, Standard & Poor's, Fitch, Pefindo, Moody's Indonesia, dan Fitch Indonesia.

Bank Victoria memuat dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko sebagai berikut.

Tabel Pengungkapan Tagihan Bersih berdasarkan Kategori Portofolio dan Skala Peringkat Bank secara Individual dan secara Konsolidasi dengan Entitas Anak.

### Pengungkapan Eksposur Risiko Kredit dan Mitigasi Risiko

Dalam pengungkapan, Bank Victoria telah memuat informasi berikut dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko.

1. Tabel Pengungkapan Tagihan Bersih Berdasarkan Bobot Risiko setelah Memperhitungkan Dampak Mitigasi Risiko Kredit Bank secara Individual dan secara Konsolidasi dengan Entitas Anak.
2. Tabel Pengungkapan Tagihan Bersih dan Teknik Mitigasi Risiko Kredit Bank secara Individual dan secara Konsolidasi dengan Entitas Anak.

### Pengungkapan Perhitungan ATMR Risiko Kredit dengan Pendekatan Standar

Dalam pengungkapan, Bank Victoria telah memuat informasi dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko sebagai berikut.

Tabel Pengungkapan Perhitungan ATMR untuk Risiko Kredit dengan Menggunakan Pendekatan Standar Bank secara Individual dan secara Konsolidasi dengan Entitas Anak.

### Disclosure of Credit Risk Exposure

Disclosure of Credit Risk with a standardized approach of credit risk refers to the Financial Services Authority Regulation No. 34/POJK.03/2016 on Amendment to Financial Services Authority Regulation No. 11/POJK.03/2016 on Capital Adequacy Ratio for Commercial Banks and Financial Services Authority Circular No. 48/SEOJK.03/2017 on Guidelines for Calculating Net Receivables for Derivative Transactions in Calculating Risk-Weighted Assets for Credit Risk by Using a Standardized Approach, and Financial Services Authority Circular No. 11/SEOJK.03/2018 on Amendment to Financial Services Authority Circular No. 42/SEOJK.03/2016 on Guidelines for Calculating Risk-Weighted Assets for Credit Risk by using Standardized Approach.

#### 1. Portfolio Category that Uses Rating

Disclosure of net receivables by portfolio category based on risk weighting after calculating the credit risk mitigation impacts and rating scale.

#### 2. Rating Agency Used

The Bank uses ratings issued by rating agencies that are recognized in accordance with Financial Services Authority regulations as stipulated in the Financial Services Authority Circular No. 37/SEOJK.03/2016 on Rating Agencies and Ratings recognized by the Financial Services Authority, among others: Moody's, Standard & Poor's, Fitch, Pefindo, Moody's Indonesia, and Fitch Indonesia.

Bank Victoria has included the following information in Appendix on Quantitative Disclosure of Risk Exposure.

Table of Disclosure of Net Receivables by Portfolio Category and Rating Scale of the Bank, Individually and Consolidated with Subsidiaries.

### Disclosure of Credit Risk Exposure and Risk Mitigation

Related to the disclosure, Bank Victoria has included the following information in Appendix on Quantitative Disclosure of Risk Exposure.

1. Table of Disclosure of Net Receivables By Risk Weight After Calculating Credit Risk Mitigation Impact of the Bank, Individually and Consolidated with Subsidiaries.
2. Table of Disclosure of Net Receivables and Credit Risk Mitigation Technique of the Bank, Individually and Consolidated with Subsidiaries.

### Disclosure of Credit Risk RWA Calculation by Standardized Approach

Related to the disclosure, Bank Victoria has included the following information in Appendix on Quantitative Disclosure of Risk Exposure.

Table of Disclosure of Credit Risk RWA Calculation by Using Standardized Approach, Bank, Individually and Consolidated with Subsidiaries.

### Mitigasi Risiko Kredit dengan Menggunakan Pendekatan Standar

1. Kebijakan Bank untuk jenis agunan  
Bank didukung oleh analisa kelayakan debitur dalam pemberian fasilitas kredit. Hal tersebut bertujuan untuk menilai kemampuan debitur dalam mengembalikan seluruh kewajibannya. Sebagai jaminan kredit, Bank menerima agunan yang memenuhi kriteria, seperti mempunyai nilai ekonomis, *marketable*, *transferable*, serta mempunyai nilai yuridis. Dalam praktiknya, diperlukan agunan sebagai *second way out*, dalam hal debitur tidak mampu mengembalikan kewajibannya.
2. Kebijakan, prosedur, serta proses untuk penilaian dan pengelolaan agunan  
Bank berpegang teguh pada peraturan otoritas yang berlaku dan telah dituangkan ke dalam kebijakan dan prosedur penilaian (*appraisal*) dan pengelolaan internal Bank. Pengelolaan agunan merupakan perangkat pengendalian risiko yang diterapkan oleh Bank guna melakukan mitigasi risiko kredit untuk meminimalisir dampak dari risiko yang terjadi.
3. Pihak-pihak utama pemberi jaminan/garansi dan kelayakan kredit (*credit worthiness*) merupakan kemampuan perusahaan untuk memenuhi kewajibannya terhadap Bank. Fokus utamanya terletak pada risiko, meliputi analisis likuiditas maupun solvabilitas. Alat analisis kredit dan kriterianya untuk penilaian seperti di antaranya jenis kredit dan tujuan kontrak utangnya.
4. Tingkat konsentrasi yang ditimbulkan dari penggunaan teknik mitigasi risiko kredit  
Konsentrasi pada sektor atau portofolio kredit Bank dilakukan dengan pengelolaan risiko konsentrasi kredit melalui penentuan limit untuk sektor industri atau portofolio kredit pada suatu tingkat risiko/*risk appetite* dan *risk tolerance* yang bisa diterima. Hal tersebut bertujuan untuk mendukung pertumbuhan kredit yang sehat dengan mengedepankan pada prinsip-prinsip kehati-hatian.

### Pengungkapan Counterparty Credit Risk (CCRA)

Bank menerapkan risiko kredit pihak lawan (*Counterparty Credit Risk*). *Counterparty Credit Risk* dapat ditimbulkan dari jenis transaksi derivatif *over the counter* (OTC) dan *repo/reverse repo*, baik pada posisi *banking book* maupun *trading book*. Dalam hal memitigasi *repo/reverse repo* dilakukan dengan penetapan limit *counterparty*, apabila terdapat pelampauan limit, maka perlu mendapatkan persetujuan Direksi melalui Divisi *International Banking*.

Pada posisi 31 Desember 2021, Bank tidak memiliki eksposur transaksi derivatif *Counterparty Credit Risk* (CCR1), *Capital Charge* untuk *Credit Valuation Adjustment* (CCR2), dan tagihan bersih derivatif kredit (CCR6). Namun terkait pengungkapan, Bank Victoria memiliki eksposur risiko transaksi *reverse repo* yang diungkapkan pada tabel pengungkapan eksposur CCR berdasarkan Kategori Portofolio dan Bobot Risiko (CCR3).

### Credit Risk Mitigation by Using Standardized Approach

1. The Bank's policy for types of collateral  
In granting credit facilities, the Bank is supported by debtor's feasibility analysis. This matter is aimed at assessing the debtor's ability in returning all of its obligations. As a credit collateral, the Bank accepts collateral that meets the criteria, such as having economic value, marketable, transferable, and having juridical value. In practice, collateral is required as a second way out, in the event that the debtor is unable to meet its obligations.
2. Policies, procedures, and processes for appraising and managing collateral  
The Bank adheres to the applicable regulatory authority that has been incorporated into the Bank's internal appraisal policies, procedures, and management. Collateral management is a risk control tool implemented by the Bank to mitigate credit risk in order to minimize the impact of the arising risks.
3. The main parties are the provider of collateral/guarantee and credit worthiness, which is the ability of the Company to fulfill its credit obligations. The main focus lies in risk, including liquidity and solvency analysis. The credit analysis tool and its criteria for assessment of among others type and purpose of the debt contract.
4. The concentration level arising from the use of credit risk mitigation techniques  
Concentration on sector or loan portfolio of the Bank is carried out by managing credit concentration risk through setting limit for industrial sector or loan portfolio of an acceptable level of risk/*risk appetite* and *risk tolerance*. This matter aims to support sound credit growth by prioritizing prudential principles.

### Disclosure of Counterparty Credit Risk (CCRA)

The Bank implements Counterparty Credit Risk. Counterparty Credit Risk is a risk arising from over the counter (OTC) derivative transaction and *repo/reverse repo* transactions, both in the banking book and trading book positions. In terms of *repo/reverse repo* mitigation with limit establishment for counterparty, approval from the Board of Directors through International Banking Division is required in the event that there is limit exceedance.

At 31 December 2021 position, the Bank has no exposure to Counterparty Credit Risk (CCR1) derivative transactions, Capital Charge for Credit Valuation Adjustments (CCR2), and net receivables of credit derivative (CCR6). However, regarding disclosure, Bank Victoria has a reverse repo transaction risk exposure which is disclosed in the CCR exposure disclosure table based on Portfolio Category and Risk Weight (CCR3).

### Pengungkapan Eksposur Sekuritisasi (SECA)

Sebagai upaya diversifikasi risiko dan memaksimalkan hasil, Bank Victoria menempatkan sejumlah portofolio dalam bentuk sekuritisasi atau Kontrak Investasi Kolektif Efek Beragun Aset (KIK EBA). Bank Victoria bertindak sebagai investor dan melakukan investasi pada EBA karena sekuritisasi ini mempunyai likuiditas baik.

Terkait pengungkapan, Bank Victoria memuat informasi Eksposur Sekuritisasi (SECA) pada *Banking Book* (SEC1) dan terkait Persyaratan Modalnya – Bank yang Bertindak sebagai Investor (SEC4), dan tidak memiliki eksposur pada *Trading Book* (SEC2), dan terkait Persyaratan Modalnya – Bank yang Bertindak sebagai Originator atau Sponsor (SEC3).

### Risiko Pasar

Risiko pasar adalah risiko pada posisi neraca dan rekening administratif, termasuk transaksi derivatif, akibat perubahan secara keseluruhan dari kondisi pasar, termasuk risiko perubahan harga *option*.

Manajemen risiko pasar tidak hanya terbatas pada pengelolaan risiko, namun juga pengawasan atas seluruh risiko yang dihadapi Bank akibat dari pergerakan faktor pasar (di antaranya suku bunga dan nilai tukar) yang dapat berasal dari *banking book* maupun *trading book*. Tujuan utama manajemen risiko untuk risiko pasar adalah untuk meminimalkan kemungkinan dampak negatif akibat perubahan kondisi pasar terhadap aset dan permodalan Bank.

Struktur organisasi manajemen risiko pasar sebagai berikut.

1. Dewan Komisaris dan Direksi bertanggung jawab untuk memastikan bahwa penerapan manajemen risiko pasar sesuai dengan tujuan strategis, skala, karakteristik bisnis, dan profil risiko pasar yang dapat berdampak pada kecukupan modal Bank.
2. Membentuk *Assets and Liabilities Committee* (ALCO) dan Komite Investasi yang secara berkala membahas hal-hal terkait pengelolaan risiko pasar, baik pada posisi *trading book* maupun *banking book* agar Bank dapat melakukan pemantauan terhadap risiko ini secara rutin dan/atau berkala.
3. Menerapkan prinsip *segregation of duties*, yaitu pemisahan fungsi dan tanggung jawab secara independen atas transaksi yang terjadi dari *risk taker* di unit *front office* (Divisi *Treasury*), *middle office* (Divisi *Risk Management/Integrated*), dan *back office* (Divisi *International Banking*).

Manajemen risiko pasar tidak hanya terbatas pada pengelolaan risiko, namun juga pengawasan atas seluruh risiko yang di hadapi Bank akibat pergerakan faktor pasar (di antaranya suku bunga dan nilai tukar), serta dapat berasal dari *trading book* dan *banking book*.

### Disclosure of Securitization Exposure (SECA)

In an effort to diversify risks and maximize returns, Bank Victoria places a number of portfolios in the form of securitization or Collective Investment Contract of Asset-Backed Securities (KIK EBA). Bank Victoria acts as an investor and invests in EBA due its good liquidity.

Regarding disclosure, Bank Victoria contains information on Securitization Exposure (SECA) in the Banking Book (SEC1) and related to its Capital Requirements – Bank Acting as Investor (SEC4), and has no exposure in the Trading Book (SEC2), and related to its Capital Requirements – Bank Acting as Originator or Sponsor (SEC3).

### Market Risk

Market Risk is a risk in balance sheet and administrative account positions including derivative transactions, due to overall changes in market conditions, including the risk of changes in option prices.

Market risk management is not only limited to risk management, but also supervision of all risks faced by the Bank as a result of movements in market factors (among others, interest rates and exchange rates) that may come from the banking book or trading book. The main objective of risk management for market risk is to minimize the possibility of negative impacts due to changes in market conditions on the Bank's assets and capital.

The market risk management organizational structure is as follows.

1. The Board of Commissioners and Board of Directors are responsible for ensuring that the market risk management implementation is in accordance with the strategic objectives, scale, business characteristics, and market risk profile that can affect the Bank's capital adequacy.
2. Establishing Assets and Liabilities Committee (ALCO) and the Investment Committee that regularly discuss matters related to market risk management, both in trading book and banking book positions, so that the Bank can monitor these risks regularly and/or periodically.
3. Applying the principle of segregation of duties, which is to separate functions and responsibilities independently over the occurring transactions from risk taker in front office unit (Treasury Division), middle office (Risk Management/Integrated Division), and back office (International Banking Division).

Market risk management is not only limited to risk management, but also supervision of all risks faced by the Bank as a result of movements in market factors (among others interest rates and exchange rates), and may come from the trading book and banking book.

Penerapan manajemen risiko pasar di antaranya dilakukan melalui langkah berikut.

1. Pengelolaan risiko suku bunga dan nilai tukar terhadap instrumen keuangan dalam *trading book* dan *banking book*;
2. Menerapkan beberapa metode untuk memitigasi kerugian yang dapat timbul dari risiko pasar, di antaranya melalui penetapan limit berdasarkan jenjang organisasi dan kebijakan mengenai limit *cut loss* sehingga lebih efektif dalam memonitor risiko pasar yang dihadapi Bank;
3. Melakukan *early warning* dengan mengukur sensitivitas pendapatan bunga bersih atas pergerakan suku bunga. Bank akan terus mengembangkan dan mengkaji ulang limit-limit risiko pasar seiring dengan berkembangnya produk-produk serta aktivitas fungsional Bank yang berpotensi menimbulkan risiko pasar; dan
4. Melakukan *stress testing* guna menilai ketahanan Bank dalam menghadapi perubahan suku bunga dan harga pasar.

#### **Pengelolaan Portofolio Trading Book dan Banking Book, serta Metodologi Valuasi yang Digunakan**

*Trading book* adalah pengelolaan portofolio seluruh posisi instrumen keuangan dalam neraca dan rekening *administrative*, termasuk transaksi derivatif yang dimiliki untuk:

1. Tujuan diperdagangkan, dipindahtangankan dengan bebas, atau dilindungi nilai secara keseluruhan, baik dari transaksi untuk kepentingan sendiri (*proprietary positions*) atas permintaan nasabah maupun untuk kegiatan perantara (*brokering*) dan dalam rangka pembentukan pasar (*market making*) yang meliputi:
    - a. Posisi yang dimiliki untuk dijual kembali dalam jangka pendek;
    - b. Posisi yang dimiliki untuk tujuan memperoleh keuntungan jangka pendek secara aktual dan/atau potensial dari pergerakan harga;
    - c. Posisi yang dimiliki untuk tujuan mempertahankan keuntungan arbitrase (*locking in arbitrage profits*). Terkait hal tersebut, Bank melakukan pengelolaan portofolio *trading book* dengan memantau limit-limit yang telah ditetapkan; dan
  2. Tujuan lindung nilai atas posisi lainnya dalam *trading book*.
- Banking book* adalah semua posisi yang tidak termasuk dalam *trading book*.

Bank melakukan pengelolaan portofolio *trading book* dan *banking book* berdasarkan pemenuhan/pengelolaan dari risiko likuiditas dan optimalisasi *idle fund*.

#### **Metodologi Valuasi/Mark-to-Market**

Seluruh *outstanding* portofolio yang dimiliki oleh Bank harus diukur nilai pasarnya (*mark-to-market*) sesuai dengan harga (*price*) yang berlaku dan dibandingkan dengan *current market price*.

#### **Pengukuran Risiko Pasar pada Trading Book maupun Banking Book**

Bank menerapkan beberapa metode dalam mitigasi kerugian yang mungkin timbul dari risiko pasar. Metode tersebut di antaranya:

Implementation of market risk management is done, among others, through the following steps.

1. Management of interest rate risk and exchange rate on financial instruments in trading book and banking book;
2. Applying several methods to mitigate losses that may arise from market risk, such as through the establishment of limits based on organizational level and policy on limit for cut loss so that it is more effective in monitoring market risk faced by the Bank;
3. Conducting an early warning by measuring the sensitivity of net interest income on interest rate movements. The Bank will continue to develop and review market risk limits in line with the development of the Bank's products and functional activities that may potentially cause market risk; and
4. Conducting stress testing to assess the Bank's resilience in facing changes in interest rates and market prices.

#### **Portfolio Management of Trading Book and Banking Book, and Valuation Methodology Used**

*Trading book* is the portfolio management of all positions of financial instruments in the balance sheet and administrative accounts, including derivative transactions held for:

1. The purpose of trade, freely transferable, or hedged as a whole, either from proprietary positions transactions at the request of the customer or for brokering activities and in order to conduct market making which include:
    - a. Positions held for resale in the short term;
    - b. Positions held for the purpose of obtaining short-term profits in actual and/or potential from price movements;
    - c. Positions held for the purpose of locking in arbitrage profits. Regarding such matter, the Bank manages trading book portfolio by monitoring the established limits; and
  2. The purpose of hedging on other positions in the trading book.
- Banking book* refers to all positions that are not included in the trading book.

The Bank manages the portfolio of trading book and banking book based on the fulfillment/management of liquidity risk and idle fund optimization.

#### **Valuation Methodology/Mark-to-Market**

All outstanding portfolios held by the Bank shall be measured of its market value (*mark-to-market*) according to the prevailing price and compared to the current market price.

#### **Market Risk Measurement in Trading Book and Banking Book**

The Bank applies several methods in mitigating loss that may incur from market risk. Such method among others:





Menetapkan limit-limit kegiatan unit bisnis untuk menjaga tingkat eksposur agar tetap sesuai dengan *risk appetite* Bank dan *stress test* ketahanan modal terhadap pergerakan faktor pasar yang sangat signifikan.

Establishing limits in business unit's activities to maintain exposure level so that it will stay in-line with the Bank's risk appetite and stress testing on capital resilience against highly significant market factor movement.

#### Portofolio (*Trading dan Banking Book*) yang Diperhitungkan dalam KPMM

Dalam perhitungan ATMR untuk risiko pasar, Bank mengacu kepada Peraturan Otoritas Jasa Keuangan No. 34/POJK.03/2016 tentang Perubahan Atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum, serta Surat Edaran Otoritas Jasa Keuangan No. 38/SEOJK.03/2016 tentang Pedoman Penggunaan Metode Standar dalam Perhitungan Kewajiban Penyediaan Modal Minimum Bank Umum dengan Memperhitungkan Risiko Pasar.

#### Langkah Antisipasi terhadap Risiko Pasar atas Transaksi Mata Uang Asing

Dalam mengantisipasi risiko pasar atas transaksi yang terkait dengan risiko nilai tukar dan suku bunga, Bank menetapkan dan melakukan pemantauan atas limit risiko pasar, seperti *limit cut loss* serta *stress test*.

Dalam pengungkapan, Bank Victoria telah memuat informasi dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko sebagai berikut.

Tabel Pengungkapan Kuantitatif Eksposur Risiko Pasar dengan Menggunakan Metode Standar secara Individual dan secara Konsolidasi dengan Entitas Anak.

#### Pengungkapan Mengenai *Interest Rate Risk in Banking Book* (IRRBB)

Bank berada dalam kelompok BUKU II (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak memenuhi kriteria untuk mengungkapkan laporan perhitungan *Interest Rate Risk in Banking Book* (IRBB) sesuai Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018 tanggal 21 Agustus 2018 tentang Penerapan Manajemen Risiko dan Pengukuran Risiko Pendekatan Standar Untuk Risiko Suku Bunga dalam *Banking Book* (IRRBB) Bagi Bank Umum. Dalam hal mengendalikan risiko suku bunga pada *banking book*, Bank menggunakan analisa sensitivitas berdasarkan *maturity gap* yang disusun dalam rangka pemenuhan ketentuan mengenai penilaian tingkat kesehatan Bank Umum dan penerapan manajemen risiko bagi Bank Umum. Parameter tersebut dapat memberikan indikasi atas risiko terhadap perspektif nilai ekonomis dan perspektif pendapatan Bank yang timbul dari pergerakan skenario suku



Mempersiapkan strategi yang diperlukan jika kondisi krisis tersebut terjadi.

Preparing necessary strategies in case of critical condition.

#### The Portfolio (*Trading and Banking Book*) Calculated in CAR

In calculating RWA for market risk, the Bank refers to Financial Services Authority Regulation No. 34/POJK.03/2016 on Amendment to Financial Services Authority Regulation No. 11/POJK.03/2016 on Minimum Capital Adequacy Ratio for Commercial Bank, and Financial Services Authority Circular No. 38/SEOJK.03/2016 on Guidelines on the Use of Standardized Method in Calculating the Minimum Capital Adequacy Ratio for Commercial Bank by Calculating Market Risk.

#### Anticipation Steps Against Market Risk on Foreign Currency Transactions

In anticipating market risks on transactions related to exchange rate and interest rate risks, the Bank determines and monitors market risk limits, such as cut loss limits and stress tests.

Related to the disclosure, Bank Victoria has included the following information in Appendix on Quantitative Disclosure of Risk Exposure.

Table of Quantitative Disclosure of Market Risk Exposure by Using Standardized Method Individually and in Consolidation with Subsidiaries.

#### Disclosure of Information on the *Interest Rate Risk in Banking Book* (IRRBB)

The Bank is within BUKU II group (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not meet the criteria to disclose calculation report of *Interest Rate Risk in Banking Book* (IRRBB) in accordance with Financial Services Authority Circular No. 12/SEOJK.03/2018 dated 21 August 2018 on the Implementation of Risk Management and Risk Measurement Using Standardized Approach for *Interest Rate Risk in the Banking Book* (IRRBB) for Commercial Banks. In terms of controlling the interest rate risk in the banking book, the Bank uses sensitivity analysis based on the maturity gap prepared in order to fulfill the provisions on the sound rating of Commercial Banks and the implementation of risk management at Commercial Banks. This parameter may provide an indication of the risks to the perspective of economic value and the Bank's revenue perspective arising from interest rate scenario

bunga dalam kondisi *shock* yang mempengaruhi posisi *banking book* pada Bank.

### Risiko Likuiditas

Risiko likuiditas adalah risiko akibat ketidakmampuan Bank untuk memenuhi kewajiban yang jatuh tempo dari sumber pendanaan arus kas dan/atau dari aset likuiditas berkualitas tinggi yang dapat diagunkan tanpa mengganggu aktivitas keuangan Bank. Risiko likuiditas dikategorikan menjadi:

1. Risiko likuiditas pasar, yaitu risiko yang timbul karena Bank tidak mampu melakukan *off setting* posisi tertentu dengan harga pasar; dan
2. Risiko likuiditas pendanaan, yaitu risiko yang timbul karena Bank tidak mampu mencairkan asetnya atau memperoleh pendanaan dari sumber dana lainnya.

Ketidakmampuan memperoleh sumber pendanaan arus kas dapat menimbulkan risiko likuiditas yang disebabkan oleh:

1. Ketidakmampuan menghasilkan arus kas yang berasal dari aset produktif maupun yang berasal dari penjualan aset termasuk aset likuid; dan
2. Ketidakmampuan menghasilkan arus kas yang berasal dari penghimpunan dana, transaksi antar Bank, dan pinjaman yang diterima.

Tujuan utama manajemen risiko untuk risiko likuiditas adalah untuk meminimalkan kemungkinan ketidakmampuan Bank dalam memperoleh sumber pendanaan arus kas.

### Organisasi Manajemen Risiko Likuiditas

1. Dewan Komisaris dan Direksi bertanggung jawab untuk memastikan bahwa penerapan manajemen risiko likuiditas sesuai dengan tujuan strategis skala usaha dan karakteristik Bank.
2. Membentuk *Assets and Liabilities Commite* (ALCO) dan Komite Investasi yang secara berkala membahas hal-hal terkait pengelolaan risiko likuiditas.
3. Dalam pelaksanaannya, manajemen risiko likuiditas dilakukan oleh Divisi *Treasury*. Divisi *Treasury* mengelola likuiditas dan melihat peluang yang dapat menghasilkan pendapatan bagi Bank, serta menjaga alat likuid dan sumber pendanaan arus kas. Sedangkan, fungsi dari Divisi *Risk Management/Integrated* adalah melakukan pemantauan terhadap pelaksanaan manajemen likuiditas yang diterapkan, di antaranya melalui pemantauan dan pengukuran yang digunakan oleh Bank dalam mengelola risiko likuiditas. Di samping itu, Divisi *Risk Management/Integrated* secara berkala melakukan *stress testing* terhadap kondisi likuiditas.

### Strategi Pendanaan

Strategi pendanaan di antaranya mencakup strategi diversifikasi sumber dan jangka waktu pendanaan yang dikaitkan dengan karakteristik dan rencana bisnis Bank. Dalam hal ini Bank mengidentifikasi dan memantau faktor utama yang mempengaruhi kemampuan Bank untuk memperoleh dana, termasuk mengidentifikasi dan memantau alternatif pendanaan yang dapat memperkuat kapasitasnya untuk bertahan pada kondisi krisis.

movements in a shock condition which affected the banking book position at the Bank.

### Liquidity Risk

Liquidity risk is a risk due to the Bank's inability to meet its due liabilities from the funding cash flows and/or from high quality liquid assets that can be pledged, without disrupting the Bank's financial activity. The liquidity risk is categorized into:

1. Market liquidity risk, which is risk arising due to the Bank is unable to offset certain positions at market prices; and
2. Funding liquidity risk is the risk arising due to the Bank is unable to withdraw the assets or obtain funding from other sources of funds.

Inability to acquire cash flows of source of fund can cause liquidity risk resulting from:

1. Inability to generate cash flows from earning assets or from the sale of assets including liquid assets; and
2. Inability to generate cash flows from fund raising, interbank transactions, and loans.

The main objective of risk management for liquidity risk is to minimize the possibility of the Bank's inability to obtain source of fund for cash flow.

### Liquidity Risk Management Organization

1. The Board of Commissioners and Board of Directors are responsible for ensuring that the liquidity risk management implementation is in line with the Bank's business scale and characteristics.
2. Establishing an Assets and Liabilities Committee (ALCO) and an Investment Committee that regularly discuss matters related to liquidity risk management.
3. In its implementation, liquidity risk management is carried out by Treasury Division. The Treasury Division manages liquidity, sees opportunities that can generate income for the Bank, and maintaining liquid assets and sources of cash flow funding. Whereas, the function of Risk Management/Integrated Division is to monitor the implementation of liquidity management, among others through the monitoring and measurement used by the Bank in managing liquidity risk. In addition, the Risk Management/Integrated Division regularly performs stress testing on liquidity conditions.

### Funding Strategy

The funding strategy includes a diversification strategy of funding sources and time period that link to the Bank's characteristics and business plans. In this matter, the Bank identifies and monitors the main factors affecting the Bank's ability to obtain funds, including identifying and monitoring alternative funding that can strengthen its capacity to withstand crisis conditions.



### Mitigasi Risiko Likuiditas

Dalam memitigasi risiko likuiditas, Bank menetapkan indikator peringatan dini (*early warning indicators*) di antaranya dengan menentukan *risk appetite* dan *risk tolerance/limit* melalui beberapa indikator keuangan seperti rasio alat likuid terhadap dana pihak ketiga dan rasio alat likuid terhadap *non-core deposit* yang adaptif terhadap perubahan.

### Stress Testing Risiko Likuiditas

*Stress testing* risiko likuiditas digunakan untuk mengukur kemampuan Bank memenuhi kebutuhan likuiditas pada kondisi krisis dengan menggunakan skenario *stress* secara spesifik Bank (*Bank Specific stress scenario*) dan skenario *stress* pada pasar (*general market stress scenario*).

Hasil *stress test* risiko likuiditas dapat menjadi masukan dalam melakukan kaji ulang terhadap kebijakan dan strategi manajemen risiko likuiditas, komposisi aset, kewajiban dan/atau rekening administratif, rencana pendanaan darurat (*contingency funding plan*) dan penetapan limit.

### Pengelolaan Risiko Likuiditas pada Saat Krisis

Dalam menghadapi krisis likuiditas, Bank telah memiliki *contingency funding plan* (CFP) yang secara formal menetapkan strategi untuk menghadapi krisis likuiditas dan prosedur untuk menutup defisit arus kas dalam situasi darurat. CFP mencakup kebijakan, strategi, prosedur dan rencana tindak (*action plan*) untuk memastikan kemampuan Bank memperoleh sumber pendanaan yang diperlukan secara tepat waktu dan dengan biaya yang wajar. Dokumen tersebut disosialisasikan kepada unit-unit terkait agar dapat memahami tugas dan tanggung jawabnya masing-masing.

### Pengungkapan Risiko Likuiditas

- 1. Pengungkapan Mengenai *Liquidity Coverage Ratio* (LCR)**  
Bank kelompok BUKU II (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak memenuhi kriteria untuk mengungkapkan laporan *Liquidity Covered Ratio* (LCR) sesuai Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 tentang Kewajiban Pemenuhan Rasio Kecukupan Likuiditas bagi Bank Umum.
- 2. Pengungkapan *Nett Stable Funding Ratio* (NSFR)**  
Bank kelompok BUKU II (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak memenuhi kriteria untuk mengungkapkan laporan *Nett Stable Funding Ratio* (NSFR) sesuai Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 tentang Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih bagi Bank Umum.
- 3. Pengungkapan Aset Terikat (*Encumbrance*) (ENC)**  
Bank kelompok BUKU II (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak memenuhi kriteria untuk mengungkapkan Laporan Aset Terikat (*Encumbrance*) sesuai Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 tentang Kewajiban Pemenuhan Rasio Kecukupan Likuiditas bagi Bank Umum.

### Mitigation of Liquidity Risk

In mitigating liquidity risk, the Bank establishes early warning indicators, among others by determining risk appetite and risk tolerance/limit through several financial indicators such as the ratio of liquid assets to third party deposits and the ratio of liquid assets to non-core deposits that are adaptive to change.

### Stress Testing of Liquidity Risk

Stress testing of liquidity risk is used to measure the Bank's ability to meet liquidity needs in crisis conditions by using Bank-specific stress scenarios and general market stress scenarios.

The results of the liquidity risk stress test can be used as input for reviewing liquidity risk management policies and strategies, composition of assets, liabilities, and/or administrative accounts, contingency funding plan, and limit setting.

### Liquidity Risk Management in Times of Crisis

To deal with liquidity crisis, the Bank already has a contingency funding plan (CFP) that formally sets out strategies to deal with liquidity crisis and procedures to cover cash flow deficits in emergency situations. CFP includes policies, strategies, procedures, and action plans to ensure the Bank's ability to obtain the necessary source of fund in a timely manner and at a reasonable cost. The document is disseminated to the relevant units so that such units can understand their respective duties and responsibilities.

### Disclosure of Liquidity Risk

- 1. Disclosure of *Liquidity Coverage Ratio* (LCR) Value**  
BUKU II group bank (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not meet the criteria to disclose *Liquidity Coverage Ratio* (LCR) report, in accordance with Financial Services Authority Regulation No. 42/POJK.03/2015 on the Obligation of Fulfillment of *Liquidity Coverage Ratio* (LCR) for Commercial Banks.
- 2. Disclosure of *Net Stable Funding Ratio* (NSFR)**  
BUKU II group bank (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not meet the criteria to disclose *Net Stable Funding Ratio* (NSFR) report, in accordance with Financial Services Authority Regulation No. 50/POJK.03/2017 on the Obligation of Fulfillment of *Net Stable Funding Ratio* (NSFR) for Commercial Banks.
- 3. Disclosure of *Encumbrance* (ENC)**  
BUKU II group bank (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not meet the criteria to disclose *Encumbrance* (ENC) report, in accordance with Financial Services Authority Regulation No. 42/POJK.03/2015 on the Obligation of Fulfillment of *Liquidity Adequacy Ratio* (LCR) for Commercial Banks.

## Risiko Operasional

Risiko operasional adalah risiko akibat ketidakcukupan dan/atau tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, dan/atau adanya kejadian-kejadian eksternal yang mempengaruhi operasional Bank.

Tujuan utama manajemen risiko untuk risiko operasional adalah untuk meminimalkan kemungkinan dampak negatif dari tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, dan/atau kejadian-kejadian eksternal.

Manajemen risiko operasional dilakukan secara konsisten terhadap kerangka kerja serta dengan menentukan strategi dan mitigasi guna memperoleh keseimbangan yang optimal antara paparan risiko operasional, efektivitas mekanisme kontrol, dan pembuatan *risk appetite*.

Adapun gangguan bisnis dari faktor eksternal dampak dari pandemi Covid-19 telah dimitigasi dengan baik, seperti *split operation*, melaksanakan sistem *Work from Home* (WFH) dan *Work from Office* (WFO), serta penyesuaian sistem kerja sesuai dengan ketentuan yang berlaku. Program vaksinasi Bank telah berjalan sesuai dengan perencanaan pemerintah.

### Struktur Organisasi Manajemen Risiko Operasional

Penerapan manajemen risiko operasional banyak melibatkan berbagai pihak dalam Bank melalui penerapan pertahanan berlapis (*three lines of defense*) yang berfungsi sebagai berikut.

1. *First line of defense* merupakan unit bisnis dan unit pendukung berperan sebagai *risk taker*. Unit kerja terdepan ini merupakan unit kerja yang melaksanakan pengelolaan risiko operasional secara harian pada masing-masing unit kerja. Pengelolannya dilaksanakan dalam rangka meningkatkan kesadaran pada masing-masing unit kerja tentang peran penting pengelolaan risiko operasional pada saat menjalankan aktivitas operasional Bank.
2. *Second line of defense* yang dijalankan oleh Divisi *Risk Management/Integrated* sebagai unit kerja yang melakukan fungsi pengawasan atas risiko operasional melalui pemantauan indikator risiko operasional, memberikan masukan kepada unit *first line of defense* dalam pengelolaan risiko yang mereka lakukan, memantau dan menyampaikan masalah risiko operasional kepada Komite Manajemen Risiko, serta memastikan pengelolaan risiko telah sesuai penerapan manajemen risiko operasional.
3. Divisi *SKAI/Integrated & Anti Fraud* sebagai *third line of defense* yang akan mengevaluasi kecukupan dan efektivitas penerapan manajemen risiko dan pengendalian internal serta meyakinkan risiko operasional telah dikelola dengan baik.

Dalam pengelolaan risiko operasional, Bank di antaranya membentuk Komite Teknologi Informasi, Komite Pengadaan, Komite Produk, dan Komite Personalia untuk menunjang operasional Bank yang secara efektif dapat menekan kerugian akibat risiko operasional.

## Operational Risk

Operational Risk is risk due to inadequacy and/or malfunction of internal process, human error, system failure, and/or external incidents affecting the Bank's operations.

The main objective of risk management for operational risk is to minimize the possible negative impacts of non-functioning internal processes, human errors, system failures, and/or external events.

Operational risk management is carried out consistently on framework and by determining strategies and mitigation in order to obtain maximum balance between operational risk exposure, effectiveness of control mechanism, and risk appetite establishment.

Business disruptions from external factors, the impact of the Covid-19 pandemic, have been well mitigated, such as split operations, implementing Work from Home (WFH) and Work from Office (WFO) systems, and adjusting the work system in accordance with applicable regulations. The Bank's vaccination program has been running according to the government's plan.

### Operational Risk Management Organizational Structure

The operational risk management implementation highly involves many parties in the Bank through the implementation of three lines of defense which function as follows.

1. First line of defense is a business unit and supporting unit that functions as risk taker. This frontline work unit is a unit that operates daily operational risk management in each work unit. Such management is implemented in order to raise awareness of each work unit on the important role of operational risk management when conducting the Bank's operational activities.
2. Second line of defense is performed by the Risk Management/Integrated Division as a work unit that performs operational risk control function through monitoring operational risk indicators, providing input to the first line of defense units in their risk management, monitoring and submitting operational risk issues to the Risk Management Committee, and ensuring that risk management is already in line with the implementation of operational risk management.
3. SKAI/Integrated & Anti Fraud Division as the third line of defense that will evaluate the adequacy and effectiveness of risk management and internal control implementation and assure that the operational risk has been well managed.

In managing operational risk, the Bank also established Information Technology Committee, Procurement Committee, Product Committee, and Personnel Committee to support the Bank's operations which can effectively reduce losses due to operational risk.

### Mekanisme yang Digunakan Bank untuk Mengidentifikasi dan Mengukur Risiko Operasional

Proses identifikasi dan pengukuran risiko dilakukan melalui penerapan perangkat manajemen risiko operasional, yakni *risk register* dengan tujuan untuk mengidentifikasi risiko-risiko pada aktivitas fungsional risiko operasional, sehingga kerugian maksimum yang mungkin timbul di masa mendatang dapat diminimalisir. *Risk Register* yang dipergunakan untuk pelaksanaan manajemen risiko operasional sebagai berikut.

#### 1. Risk and Control Self Assessment (RCSA)

RCSA merupakan alat untuk mengidentifikasi dan mengukur risiko operasional yang bersifat kualitatif dan prediktif dengan menggunakan dimensi dampak dan kemungkinan kejadian. RCSA umumnya difokuskan pada risiko-risiko yang memiliki dampak terhadap kemampuan Bank dalam menjaga kelangsungan bisnis dan operasional. Proses penilaian risiko dilakukan dengan melakukan *self assessment* tentang evaluasi tingkat risiko, yang mencakup kemungkinan kejadian, besarnya dampak, dan tingkat efektivitas kontrol. Selanjutnya, RCSA mendeteksi kecukupan internal kontrol Bank untuk mencegah penyimpangan/kegagalan yang terjadi, serta menerapkan pengendalian risiko operasional yang tepat untuk mengelola risiko operasional agar tetap berada dalam tingkatan toleransi risiko operasional.

#### 2. Key Risk Indicator (KRI)

KRI adalah perangkat yang lazim digunakan untuk mengidentifikasi dan menganalisis risiko sejak dini (*early warning*) atas naik-turunnya indikator-indikator tingkat risiko operasional yang melekat pada setiap aktivitas bisnis dan operasional Bank. Manfaat KRI antara lain dapat memantau dan memprediksi eksposur risiko operasional, serta mengidentifikasi perubahan profil risiko operasional. Indikator risiko utama memberikan informasi tentang risiko potensial kerugian di masa depan. Ambang batas (pemicu) dapat didefinisikan untuk KRI dan dapat berfungsi sebagai indikator dalam sistem peringatan dini.

#### 3. Loss Event Database (LED)

LED merupakan alat/perangkat manajemen risiko operasional yang digunakan untuk mencatat/mengelola data kejadian yang telah terjadi dalam operasional Bank. *Database* kerugian, baik yang bersifat potensial maupun aktual merupakan prasyarat penting dalam proses penyusunan model pengukuran kerugian risiko operasional dan sebagai alat untuk melakukan validasi setiap proses penilaian risiko atau prediksi risiko.

### Mekanisme untuk Memitigasi Risiko Operasional

Guna memitigasi risiko operasional, Bank telah melakukan peningkatan sumber daya manusia melalui pendidikan dan pelatihan secara berkelanjutan. Hal tersebut bertujuan agar kemampuan karyawan dalam melaksanakan tugas dapat berjalan dengan lebih baik. Selain itu, Bank telah melakukan evaluasi dan revisi atas kebijakan dan sistem prosedur yang sudah ada, memeriksa akses level, dan limit-limit transaksi sesuai dengan tugas dan tanggung jawab masing-masing karyawan, mengembangkan teknologi informasi serta menerapkan sistem pengendalian internal.

### Mechanism Used by the Bank to Identify and Measure Operational Risk

Risk identification and measurement process is performed by applying operational risk management tools, namely risk register aimed to identify risks in operational risk functional activities so that maximum losses that may arise in the future can be minimized. The Risk Registers used for the implementation of operational risk management are as follows.

#### 1. Risk and Control Self Assessment (RCSA)

RCSA is a tool for identifying and measuring operational risks that are qualitative and predictive using the dimensions of impact and possible events. RCSA is generally focused on risks that have an impact on the Bank's ability to maintain its business and operational sustainability. The risk assessment process is carried out by conducting self-assessment of risk level evaluation, including possible events, magnitude of impacts, and control effectiveness level. Furthermore, RCSA detects the adequacy of the Bank's internal control to prevent any deviations/failures, and to apply appropriate operational risk controls to manage operational risk in order to stay within the operational risk tolerance level.

#### 2. Key Risk Indicator (KRI)

KRI is a common tool used to identify and analyze early warning on the upward and downward movement of indicators of operational risk level that is inherent in every business activity and operation of the Bank. KRI benefits include monitoring and predicting operational risk exposures and identifying changes of operational risk profile. The main risk indicators provide information on the risk of potential losses in the future. Thresholds (triggers) can be defined for KRI and can serve as indicators in an early warning system.

#### 3. Loss Event Database (LED)

LED is an operational risk management tool/instrument used to record/manage incident data occurred during the Bank's operations. The database of losses, both potential and actual, is an important pre-requisite in the process of formulating measurement model of operational risk loss and as a tool for validating every risk assessment or risk prediction process.

### Operational Risk Mitigation Mechanism

In order to mitigate operational risk, the Bank has increased its human resources by carrying out continuous education and training. This is intended for enhancing employees' ability so that they can perform their duties properly. Furthermore, the Bank has also evaluated and revised the existing policies and system procedures, examined access level and transaction limits according to each employee's duties and responsibilities, developed information technology and applied internal control system.

Untuk menjaga kelangsungan bisnis terhadap peristiwa yang tidak diinginkan, Bank mempunyai *business continuity management* (BCM) dan juga telah memiliki lokasi *off site back up* yang digunakan pada saat pengujian BCM. Dalam penanggulangan bencana, Bank memiliki pusat data (*data center*) dan pusat penanggulangan bencana (*disaster recovery center*) yang terdapat di 2 (dua) lokasi berbeda di dalam negeri. Hal ini akan memungkinkan sistem-sistem penting, termasuk sistem inti, serta sistem pembayaran dan sistem pelaporan regulator yang tetap berjalan jika terjadi bencana.

#### **Pengungkapan Risiko Operasional**

Dalam perhitungan ATMR untuk risiko operasional, Bank mengacu kepada Peraturan Otoritas Jasa Keuangan No. 34/POJK.03/2016 tentang Perubahan Atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 24/SEOJK.03/2016 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Operasional dengan Menggunakan Pendekatan Indikator Dasar.

Bank Victoria memuat informasi dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko sebagai berikut.

Tabel Pengungkapan Kuantitatif Risiko Operasional Bank secara Individual dan secara Konsolidasi dengan Entitas Anak.

#### **Risiko Hukum**

Risiko hukum merupakan risiko akibat tuntutan hukum dan/atau kelemahan aspek yuridis. Risiko hukum dapat bersumber antara lain dari kelemahan aspek yuridis yang disebabkan oleh lemahnya perikatan yang dilakukan oleh Bank, ketiadaan dan/atau perubahan peraturan perundang-undangan yang menyebabkan suatu transaksi yang telah dilakukan Bank menjadi tidak sesuai dengan ketentuan, dan proses litigasi baik yang timbul dari gugatan pihak ketiga terhadap Bank maupun Bank terhadap pihak ketiga.

Tujuan utama manajemen risiko untuk risiko hukum adalah untuk memastikan bahwa proses manajemen risiko dapat meminimalkan kemungkinan dampak negatif dari kelemahan aspek yuridis, ketiadaan dan/atau perubahan peraturan perundang-undangan, dan proses litigasi.

#### **Organisasi Manajemen Risiko Hukum**

Dalam rangka mengendalikan risiko hukum yang mungkin terjadi, Bank memiliki satuan kerja hukum, yaitu Divisi *Corporate Legal* dan *Credit Legal* sebagai unit yang mendukung dan memastikan penerapan manajemen risiko hukum secara efektif. Divisi *Corporate Legal* berperan sebagai *Legal Advisor* dan memberikan opini terkait aktivitas dan/atau produk baru yang akan ditawarkan Bank. Sedangkan, *Credit Legal* membantu unit bisnis dan memverifikasi dokumen-dokumen yang berkaitan dengan perjanjian antara Bank dan nasabahnya dan memastikan dokumen-dokumen tersebut telah sesuai peraturan yang berlaku.

In order to maintain its business continuity against undesired events, the Bank has business continuity management (BCM) and also already has an offsite back up location used during the BCM testing. In disaster management, the Bank has data center and disaster recovery center located in 2 (two) different locations within the country. This will enable the critical systems, including core systems, as well as payment systems and regulatory reporting systems, to keep operating at times of disaster.

#### **Disclosure of Operational Risk**

In calculating RWA for operational risk, the Bank refers to Financial Services Authority Regulation No. 34/POJK.03/2016 on Amendment to Financial Services Authority Regulation No. 11/POJK.03/2016 on Minimum Capital Adequacy Ratio for Commercial Bank, and Financial Services Authority Circular No. 24/SEOJK.03/2016 on Calculation of Risk Weighted Assets (RWA) for Operational Risk by using Basic Indicator Approach.

Bank Victoria has included the following information in Appendix on Quantitative Disclosure of Risk Exposure.

Table of Quantitative Disclosure of Operational Risk Bank Individually and Consolidated with Subsidiaries.

#### **Legal Risk**

Legal risk is a risk as a result of lawsuits and/or weakness of juridical aspect. Legal risk can be sourced from, among others, weaknesses in the juridical aspects caused by weak commitments made by the Bank, absence and/or changes in laws and regulations that cause a transaction made by the Bank becomes not in accordance with the provisions, and litigation processes either arising from third party claims against the Bank or the Bank against third parties.

The main objective of risk management for legal risk is to ensure that the risk management process minimizes the possibility of negative impact from weakness of juridical aspects, the absence of and/or amendment to laws and regulations and litigation process.

#### **Legal Risk Management Organization**

In order to control legal risk that may happen, the Bank has a legal work unit, namely the Corporate Legal and Credit Legal Division as a unit that supports and ensures effective implementation of legal risk management. The Corporate Legal Division acts as a legal advisor and provides opinions regarding new activity and/or product to be offered by the Bank. Meanwhile, Credit Legal helps business unit and verifies documents related to agreements between the Bank and its customers and ensures that the documents are in accordance with the applicable regulations.

### Mekanisme Pengendalian Risiko Hukum

Langkah yang dilakukan dalam upaya mitigasi risiko hukum meliputi:

1. Standarisasi dokumen hukum terkait produk atau fasilitas perbankan yang ditawarkan oleh Bank kepada masyarakat. Dokumen tersebut dibuat dengan mengacu kepada ketentuan peraturan perundangan yang berlaku, serta memperhatikan kepentingan aspek yuridis dari Bank;
2. Memberikan opini hukum atas aktivitas dan/atau produk baru sebelum diperkenalkan atau dipasarkan ke masyarakat;
3. Memantau perkembangan kasus-kasus hukum yang terjadi dan memberikan perhatian khusus atas kasus hukum yang berpotensi menimbulkan kerugian;
4. Memberikan informasi dan pengetahuan hukum kepada unit-unit terkait;
5. Melakukan evaluasi atas dokumen-dokumen atau perjanjian-perjanjian guna mengamankan kepentingan hukum Bank; dan
6. Meningkatkan kemampuan dan pengetahuan sumber daya manusia, serta pengkajian atas perkara litigasi yang telah terjadi.

### Risiko Reputasi

Risiko reputasi adalah risiko yang terkait atas persepsi negatif terhadap Bank yang dapat bersumber dari berbagai kejadian yang tidak diinginkan, antara lain publikasi negatif atas operasional Bank, pelanggaran etika bisnis, keluhan nasabah, kelemahan tata kelola dan kejadian-kejadian lainnya yang dapat mengakibatkan penurunan citra Bank.

Tujuan utama manajemen risiko untuk risiko reputasi adalah untuk mengantisipasi dan meminimalkan dampak kerugian dari risiko reputasi Bank.

### Organisasi Manajemen Risiko Reputasi

Pengelolaan risiko reputasi dilakukan oleh Divisi *Corporate Secretary* bekerja sama dengan Divisi *Marketing Communication* sebagai unit yang mendukung pengelolaan risiko reputasi dan Divisi *Operational* dalam menangani keluhan nasabah antara lain dilakukan melalui:

1. Pemantauan terhadap publikasi negatif atau keluhan nasabah yang beredar di media, monitoring atas keluhan nasabah yang disampaikan langsung ke Bank dan tindak lanjutnya; serta
2. Dalam hal terdapat pemberitaan negatif yang berpotensi menimbulkan risiko reputasi, Bank akan secara proaktif mencari informasi serta melakukan langkah yang diperlukan untuk memperoleh solusi terbaik.

### Kebijakan dan Mekanisme dalam Rangka Meningkatkan Kualitas Pelayanan kepada Nasabah dan Pemangku Kepentingan Lainnya untuk Mengendalikan Risiko Reputasi

Bank telah membentuk layanan *contact center* yang secara khusus menangani keluhan nasabah melalui layanan telepon 24 jam dan melakukan *monitoring* atas keluhan nasabah serta tindak lanjutnya.

### Legal Risk Control Mechanism

Measures taken in the effort to mitigate legal risk includes:

1. Standardizing the legal documents related to banking products or facilities offered by the Bank to the public which will be made in accordance with the prevailing laws and regulations and taking into account the Bank's juridical aspect;
2. The Bank has a business continuity plan to minimize the Bank's business disruption and accelerate crisis recovery process of reputation risk.
3. Monitoring the progress of legal cases and paying special attention to legal cases having the potential to cause loss;
4. Providing legal information and knowledge to relevant units;
5. Evaluating documents or agreements to safeguard the Bank's legal interests; and
6. Improve the capabilities and knowledge of human resources, as well as assessment of the litigation cases occurred.

### Reputation Risk

Reputation risk is a risk associated with negative perceptions on the Bank that can be sourced from various undesirable events, such as: negative publicity of the Bank's operations, violations of business ethics, customer complaints, governance weaknesses, and other incidents that can result in a decrease image of the Bank.

The main objective of risk management for reputation risk is to anticipate and minimize the impact of losses from the Bank's reputation risk.

### Reputation Risk Management Organization

Reputation risk is managed by the Corporate Secretary Division in cooperation with the Marketing Communication Division as a unit that supports reputation risk management and Operations Division in handling customer complaints by conducting among others:

1. Monitoring the negative publicity or customer complaints circulating in the media, monitoring customer complaints that are submitted directly to the Bank and their followups; and
2. In the event that there is negative reporting that may potentially rise reputation risk, the Bank will proactively seek information and take the necessary steps to obtain the best solution.

### Policy and Mechanism in the Framework of Increasing Services Quality to Customers and Other Stakeholders to Control Reputation Risk

The Bank has established a contact center service that specifically handles customer complaints through 24-hour telephone service and monitors customer complaints and their follow-up.



Dalam rangka pengendalian risiko reputasi, Bank melakukan beberapa hal di antaranya:

1. Tersedianya ketentuan penanganan pengaduan nasabah yang secara jelas mengatur kebijakan, prosedur, unit kerja yang melakukan pemantauan dan pelaporan seputar penanganan pengaduan nasabah; serta
2. Pemantauan terhadap jumlah dan penyelesaian pengaduan nasabah serta pemberitaan negatif tentang Bank Victoria.

#### **Pengelolaan Risiko Reputasi pada Saat Krisis**

1. Pengelolaan krisis komunikasi akan dikoordinasikan oleh pihak internal dan eksternal Bank termasuk media massa dengan alur protokol komunikasi dan penanggung jawab komunikasi; serta
2. Bank memiliki *business continuity plan* untuk meminimalisasi gangguan usaha Bank dan mempercepat proses pemulihan krisis pada risiko reputasi.

### **Risiko Strategik**

Risiko strategik adalah risiko akibat ketidaktepatan dalam pengambilan dan/atau pelaksanaan suatu keputusan strategis, serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Ketidakmampuan Bank dalam melakukan penyusunan strategi yang tepat dapat menimbulkan kegagalan bisnis Bank di masa yang akan datang. Risiko ini juga mencakup kemampuan Bank dalam mengembangkan daya saing dan menciptakan keunggulan kompetitif Bank di tengah kompetisi perbankan yang semakin ketat.

Tujuan utama manajemen risiko untuk risiko strategik adalah memastikan bahwa proses manajemen risiko dapat meminimalkan kemungkinan dampak negatif dari ketidaktepatan pengambilan keputusan strategik dan kegagalan dalam mengantisipasi perubahan lingkungan bisnis.

Bank selalu mengevaluasi kinerja bisnis dari waktu ke waktu yang disesuaikan dengan perubahan internal maupun eksternal Bank guna memperkecil risiko strategik Bank.

#### **Struktur Organisasi Manajemen Risiko Strategik**

Pelaksanaan manajemen risiko strategik dilakukan oleh Divisi *Finance and Accounting* yang berada di bawah pengawasan aktif Manajemen Bank, yaitu Direksi. Direksi memberikan arahan rencana strategis dan mengomunikasikan Rencana Bisnis Bank kepada Pemegang Saham dan seluruh jenjang organisasi. Sementara itu, Dewan Komisaris melakukan pengawasan, meninjau, serta menyetujui Rencana Bisnis Bank.

Bank memiliki sistem pengendalian internal untuk manajemen risiko strategik, mencakup pengawasan secara berkala atas kinerja Bank yang berdampak pada pendapatan usaha dan budaya pengendalian risiko strategik yang melibatkan seluruh lini bisnis Bank.

**Kebijakan Bank dalam Mengidentifikasi dan Merespon Perubahan Lingkungan Bisnis, Baik Eksternal maupun Internal**  
Penyusunan strategi Bank dituangkan dalam rencana bisnis Bank melalui serangkaian diskusi yang melibatkan jajaran manajemen. Kebijakan umum atau arahan strategis yang

In order to control reputation risk, the Bank, among others, conducts the following matters:

1. The availability of provisions for handling customer complaints that clearly regulate policies, procedures, work units that monitor and report on the handling of customer complaints; and
2. Monitoring the number and settlement of customer complaints as well as negative news about Bank Victoria.

#### **Reputation Risk Management in Times of Crisis**

1. The management of communication crisis will be coordinated by the Bank's internal and external parties, including mass media under the flow of communication protocol and the person in charge of communication; and
2. The Bank has a business continuity plan to minimize the Bank's business disruption and accelerate crisis recovery process of reputation risk.

### **Strategic Risk**

Strategic Risk is a risk as a result of incorrectness in making and/or implementing a strategic decision, as well as failure in anticipating changes in the business environment. The Bank's inability to formulate appropriate strategies may result in the failure of the Bank's business in the future. This risk also includes the Bank's ability to develop competitiveness and create a competitive advantage in the midst of the increasingly tight banking competition.

The main objective of risk management for strategic risk is to ensure that the risk management process can minimize the potential negative impact of inaccuracy of strategic decision making and failure in anticipating changes in the business environment.

The Bank always evaluates the business performance from time to time in accordance with the Bank's internal and external changes to minimize the Bank's strategic risks.

#### **Strategic Risk Management Organizational Structure**

Strategic risk management is performed by the Finance and Accounting Division, which is under active supervision of the Bank's Management, namely the Board of Directors. The Board of Directors provides strategic planning directions and communicates the Bank Business Plan to Shareholders and all levels of the organization. Whereas, the Board of Commissioners supervises, reviews, and approves the Bank Business Plan.

The Bank has an internal control system for the strategic risk management that covers the regular monitoring of the Bank's performance that impacts on business income and a strategic risk control culture involving all of the Bank's business lines.

#### **Bank Policies to Identify and Respond to Changes in Business Environment, External and Internal**

The formulation of the Bank's strategy set forth in the Bank's business plan through a series of discussions involving management ranks. The general policies or strategic directions

dirumuskan Bank adaptif terhadap perubahan lingkungan, baik internal maupun eksternal dan dilakukan dalam perspektif jangka pendek maupun jangka menengah, yang dikaji ulang secara berkala minimal setahun sekali.

Bank Victoria telah melakukan langkah strategis di tengah ketidakpastian ekonomi dengan mempertimbangkan dan menyesuaikan beberapa aktivitas yang dilakukan secara manual atau konvensional ke dalam proses digitalisasi, melakukan pemantauan risiko yang bersifat holistik dari risiko kredit dampak penyebaran Covid-19, dan upaya peningkatan efisiensi biaya.

#### **Mekanisme untuk Mengukur Kemajuan yang Dicapai dari Rencana Bisnis yang Ditetapkan**

Pemantauan dan evaluasi atas pencapaian kinerja keuangan Bank terhadap target yang telah disusun mendapatkan perhatian penuh dari manajemen Bank, yang secara khusus menjadi pembahasan dalam rapat Direksi secara rutin setiap bulan atau antara Dewan Komisaris dengan Direksi.

#### **Risiko Kepatuhan**

Risiko kepatuhan adalah risiko akibat Bank tidak mematuhi dan/atau tidak melaksanakan peraturan perundang-undangan dan ketentuan yang berlaku. Kegagalan dalam mengelola risiko kepatuhan tersebut dapat menyebabkan Bank terkena sanksi dan denda dari regulator serta berdampak terhadap kelangsungan usaha Bank, sehingga dapat mempengaruhi tata kelola Bank.

Risiko kepatuhan dapat bersumber dari perilaku hukum, yaitu perilaku atau aktivitas Bank yang menyimpang atau melanggar dari ketentuan dan/atau peraturan perundang-undangan. Sedangkan perilaku organisasi, yaitu perilaku atau aktivitas Bank yang menyimpang atau bertentangan dari standar yang berlaku secara umum.

Tujuan utama manajemen risiko untuk risiko kepatuhan adalah untuk memastikan bahwa proses manajemen risiko dapat meminimalkan kemungkinan dampak negatif yang menyimpang atau melanggar standar dan/atau peraturan dan perundang-undangan yang berlaku.

#### **Organisasi Manajemen Risiko Kepatuhan**

Organisasi manajemen risiko kepatuhan melibatkan pengawasan aktif Dewan Komisaris dan Direksi terhadap risiko kepatuhan. Untuk mendukung fungsi pengawasan tersebut, Bank Victoria membentuk komite-komite yang diperlukan, antara lain Komite Tata Kelola Terintegrasi pada tingkat Dewan Komisaris dan Komite Implementasi dan *Monitoring* GCG pada tingkat Direksi.

Dewan Komisaris melalui Komite Tata Kelola Terintegrasi melakukan pengawasan terhadap kebijakan dan pelaksanaan fungsi kepatuhan dalam pengelolaan risiko kepatuhan. Direksi berperan aktif dalam menumbuhkan dan mewujudkan terlaksananya budaya kepatuhan pada semua tingkatan organisasi dan kegiatan usaha Bank.

formulated by the Bank are made adaptive to internal and external environment changes and carried out in a short-term and medium-term perspective, reviewed periodically at least once a year.

Bank Victoria has taken strategic steps in the midst of economic uncertainty by considering and adjusting several activities carried out manually or conventionally to the digitalization process, conducting holistic risk monitoring of credit risk due to the Covid-19 spread, and making efforts to increase cost efficiency.

#### **Mechanism to Measure Progress Achieved from the Defined Business Plan**

Monitoring and evaluation of the Bank's financial performance achievement against the targets set have received the Bank's management full attention, which is specifically discussed in the Board of Directors' meetings regularly on a monthly basis or between the Board of Commissioners and the Board of Directors.

#### **Compliance Risk**

Compliance risk is a risk due to the Bank's failure to comply with and/or enforce the applicable laws and regulations. Failure to manage compliance risk may cause the Bank to be subject to sanctions and penalties from the regulator, and therefore, affecting the Bank's business continuity and governance.

Compliance risk may arise from legal behavior, which is the Bank's behavior or activity that deviates from or violates the provisions and/or laws and regulations. Whereas organizational behavior, which is the Bank's behavior or activity that deviates from or in contrary to the generally accepted standards.

The main objective of risk management for compliance risk is to ensure that the risk management process can minimize the possibility of negative impacts that deviates or violates the generally accepted standards and/or laws and regulations.

#### **Compliance Risk Management Organization**

Compliance risk management organization involves active supervision of the Board of Commissioners and Board of Directors on compliance risk. To support this supervisory function, Bank Victoria established the necessary committees, including the Integrated Governance Committee at Board of Commissioners level and the GCG Implementation and Monitoring Committee at Board of Directors level.

The Board of Commissioners, through the Integrated Governance Committee, oversees the policies and implementation of compliance function in managing compliance risk. The Board of Directors plays an active role in fostering and realizing the implementation of compliance culture at all levels of organization and business activities of the Bank.



Bank memiliki Direktur yang membawahi fungsi kepatuhan (Direktur Kepatuhan dan Manajemen Risiko) yang bertanggung jawab atas pelaksanaan fungsi kepatuhan dan berperan penting dalam manajemen risiko kepatuhan. Pelaksanaan tugas dan tanggung jawab Direktur Kepatuhan dan Manajemen Risiko didukung oleh Satuan Kerja Kepatuhan (Divisi *Compliance/Integrated, AML & System Procedure*).

Selain itu, Divisi *Compliance/Integrated, AML & System Procedure* bertanggung jawab terhadap penerapan Program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme (APU dan PPT) di Bank dan sistem prosedur.

#### **Strategi Manajemen Risiko dan Efektivitas Penerapan Manajemen Risiko Kepatuhan**

Penerapan manajemen risiko kepatuhan disesuaikan dengan ukuran dan kompleksitas usaha Bank tidak terlepas dari pengawasan aktif Dewan Komisaris dan Direksi dalam merumuskan strategi dengan memperhatikan tingkat risiko yang akan diambil dan risiko toleransi guna mendorong terciptanya budaya kepatuhan, menetapkan sistem dan prosedur yang akan digunakan untuk penyusunan ketentuan dan pedoman internal Bank, serta melakukan tindakan pencegahan agar kebijakan dan/atau keputusan tidak menyimpang dari ketentuan dan perundang-undangan yang berlaku.

#### **Pemantauan dan Pengendalian Risiko Kepatuhan**

Wujud penerapan manajemen risiko kepatuhan antara lain dengan:

1. Mewujudkan terlaksananya budaya kepatuhan pada seluruh kegiatan usaha Bank di setiap jenjang organisasi, antara lain melalui pelaksanaan sosialisasi dan pelatihan atas ketentuan dan aturan yang berlaku, serta memberikan masukan dan saran kepada unit-unit lain untuk memastikan kepatuhan Bank;
2. Menilai dan mengevaluasi kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan dan peraturan yang berlaku;
3. Memantau atas pelaksanaan prinsip kehati-hatian Bank;
4. Mengelola risiko kepatuhan, selain dilakukan melalui uji kepatuhan, juga dilakukan melalui pemantauan terhadap pemenuhan komitmen Bank kepada regulator, baik berdasarkan hasil pemeriksaan regulator maupun melalui korespondensi antara Bank dengan regulator; dan
5. Penerapan APU & PPT di perbankan yang terdiri dari 5 (lima) prinsip utama, yaitu:
  - a. Pengawasan aktif Dewan Komisaris dan Direksi;
  - b. Kebijakan dan prosedur;
  - c. Pengendalian internal;
  - d. Sistem informasi manajemen; dan
  - e. Sumber daya manusia dan pelatihan.

The Bank has a Director in charge of compliance function (Director of Compliance and Risk Management) who is responsible for implementing compliance function and plays an important role in compliance risk management. The implementation of duties and responsibilities of the Director of Compliance and Risk Management is supported by the Compliance Work Unit (Compliance/Integrated, AML, & System Procedure Division).

In addition, the Compliance/Integrated, AML, & System Procedure Division is responsible for implementing the Anti Money Laundering and Counter-Terrorism Funding (AML and CTF) in the Bank and the procedure system.

#### **Risk Management Strategy and Effectiveness of Compliance Risk Management Implementation**

The implementation of compliance risk management is adjusted to the Bank's business size and complexity, which is inseparable from the active supervision of the Board of Commissioners and Board of Directors in formulating strategies by considering the risk appetite and risk tolerance in order to promote the creation of a compliance culture, to establish system and procedure that will be used for the preparation of the Bank's internal provisions and guidelines, and to take preventive actions so that the policies and/or decisions do not deviate from the applicable provisions, laws and regulations.

#### **Monitoring and Controlling Compliance Risk**

The implementation of compliance risk management, among others, is by:

1. Achieving the implementation of compliance culture at all of the Bank's business activities at every organizational level, through dissemination and training on the prevailing rules and regulations, and providing input and advice to other units to ensure the Bank's compliance;
2. Assessing and evaluating the adequacy and conformity of the Bank's policies, regulations, systems, and procedures against the applicable provisions and regulations;
3. Monitoring the implementation of the Bank's prudential principles;
4. Managing compliance risk, in addition to conducting compliance tests, is also conducted through monitoring on the Bank's commitment to the regulator, either based on regulatory examination results or through correspondence between the Bank and the regulator; and
5. Implementing AML & CTF in banking consisting of 5 (five) main principles, which are:
  - a. Active monitoring of the Board of Commissioners and Board of Directors;
  - b. Policies and procedures;
  - c. Internal control;
  - d. Management information system; and
  - e. Human resources and Training.

## Manajemen Risiko Grup Keuangan Victoria

Industri Lembaga Jasa Keuangan (LJK) memiliki sistem keuangan yang sangat kompleks, dinamis, dan saling terkait antar masing-masing sektor jasa keuangan yang menyebabkan meningkatnya eksposur risiko. Menghadapi kondisi tersebut, penerapan manajemen risiko dilakukan secara komprehensif dan terintegrasi, baik yang berasal dari Entitas Anak maupun dari perusahaan berelasi (*sister company*) yang tergabung dalam suatu Grup Keuangan Victoria.

### Dasar Penerapan Manajemen Risiko pada Grup Keuangan Victoria

Berdasarkan Surat Otoritas Jasa Keuangan (OJK) No. S-66/PB.33/2021 tanggal 23 Juni 2021 perihal Perubahan Status Konglomerasi Keuangan Grup Victoria menjadi Grup Keuangan Victoria beserta lampirannya, dan tidak bertentangan dengan ketentuan Peraturan Otoritas Jasa Keuangan (POJK) terkait Konglomerasi Keuangan dan Kewajiban Penyediaan Modal Minimum Terintegrasi Bagi Konglomerasi Keuangan (KPMMT) sepanjang dinyatakan tetap berlaku, di antaranya:

1. Peraturan Otoritas Jasa Keuangan No. 17/POJK.03/2014 tanggal 18 November 2014 tentang Penerapan Manajemen Risiko Terintegrasi Bagi Konglomerasi Keuangan;
2. Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2014 tanggal 18 November 2014 tentang Penerapan Tata Kelola Terintegrasi Bagi Konglomerasi Keuangan; dan
3. Peraturan Otoritas Jasa Keuangan No. 26/POJK.03/2015 tanggal 11 Desember 2015 tentang Kewajiban Penyediaan Modal Minimum Terintegrasi Bagi Konglomerasi Keuangan.

### Anggota Grup Keuangan Victoria

Berdasarkan Surat Keputusan Direksi No. 001/SK-DIR/08/21 tanggal 20 Agustus 2021, Lembaga Jasa Keuangan yang tercakup dalam Grup Keuangan Victoria pada tahun 2021 terdiri dari:

## Victoria Financial Group Risk Management

Financial Services Institution (LJK) industry has complex and dynamic financial system and interrelated among each financial service leading to the increase in risk exposure. To deal with such condition, the risk management is implemented comprehensively and in an integrated manner, whether coming from its Subsidiary or related companies (*sister company*), which are incorporated into the Victoria Financial Group.

### Basis of Risk Management Implementation in Victoria Financial Group

Based on the Financial Services Authority (FSA) Letter No. S-66/PB.33/2021 dated 23 June 2021 on Changes in Status of Victoria Group Financial Conglomeration to Victoria Financial Group and its attachments, this does not conflict with the provisions of Financial Services Authority Regulations (FSAR) regarding Financial Conglomeration and Integrated Minimum Capital Adequacy Requirement for Financial Conglomeration (KPMMT), as long as it remains valid, among others:

1. Financial Services Authority Regulation No. 17/POJK.03/2014 dated 18 November 2014, on Implementation of Integrated Risk Management for Financial Conglomeration;
2. Financial Services Authority Regulation No. 18/POJK.03/2014 dated 18 November 2014 on Implementation of Integrated Governance for Financial Conglomeration; and
3. Financial Services Authority Regulation No. 26/POJK.03/2015 dated 11 December 2015 on Integrated Minimum Capital Adequacy Requirement for Financial Conglomeration.

### Members of Victoria Financial Group

Based on Board of Directors' Decision Letter No. 001/SK-DIR/08/21 dated 20 August 2021, Financial Services Institutions included in Victoria Financial Group in 2021 consisted of:



Bank Victoria telah ditunjuk sebagai Entitas Koordinator dalam Grup Keuangan Victoria berdasarkan Surat Otoritas Jasa Keuangan (OJK) No. S-66/PB.33/2021 tanggal 23 Juni 2021 perihal Perubahan Status Konglomerasi Keuangan Grup Victoria menjadi Grup Keuangan Victoria.

Melalui pengelolaan risiko yang lebih baik, sesuai dengan kompleksitas dan karakteristik usaha pada grup keuangan, pada akhirnya dapat menghasilkan sinergi serta meningkatkan kapasitas bisnis dan permodalan. Dalam rangka penerapan manajemen risiko yang komprehensif dan efektif, Entitas Koordinator perlu membentuk organisasi manajemen risiko secara terintegrasi dalam Grup Keuangan Victoria, antara lain Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria dan Satuan Kerja Manajemen Risiko Terintegrasi (SKMRT).

Satuan Kerja Manajemen Risiko Terintegrasi (SKMRT) melakukan pemantauan eksposur risiko pada anggota Grup Keuangan Victoria serta memberikan informasi kepada Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria akan hal-hal yang perlu ditindaklanjuti terkait hasil evaluasi dari pemantauan terhadap penerapan manajemen risiko secara terintegrasi, dengan rincian sebagai berikut.

1. Bagan struktur Grup Keuangan Victoria;
2. Data keuangan, antara lain:
  - a. Data keuangan secara individu;
  - b. Data keuangan secara konsolidasi; dan
  - c. Data keuangan Grup Keuangan Victoria;
 

Dimana untuk informasi data keuangan tersebut harus memuat:

    - i. Total aset;
    - ii. Total modal berdasarkan modal aktual sesuai perhitungan Kewajiban Penyediaan Modal Minimum Terintegrasi (KPMMT). Perhitungan Rasio KPMMT adalah perbandingan antara total modal aktual Grup Keuangan Victoria (*aggregate net equity*) dengan total modal minimum Grup Keuangan Victoria (*aggregate regulatory capital requirement*); dan
    - iii. Laba bersih;
3. Transaksi intragrup, antara lain:
  - a. Transaksi keuangan;
  - b. Transaksi non-keuangan; dan
  - c. Mitigasi risiko transaksi intragrup.

Penerapan manajemen risiko pada Grup Keuangan Victoria secara terintegrasi dilakukan melalui pendekatan berdasarkan risiko dengan prinsip-prinsip:

1. Agregasi risiko, yaitu penilaian risiko didasarkan pada risiko yang terdapat dalam konglomerasi keuangan Grup Victoria secara menyeluruh dengan memperhatikan dampak yang ditimbulkan terhadap kondisi Grup Keuangan Victoria;
2. Holistik, yaitu penilaian risiko dilakukan dengan melihat keterkaitan antara satu faktor dengan faktor lainnya, sehingga diperoleh kesimpulan yang memberikan gambaran mengenai risiko Grup Keuangan Victoria secara keseluruhan;

Bank Victoria has been appointed as the Coordinator Entity within Victoria Financial Group based on the Financial Services Authority (FSA) Letter No. S-66/PB.33/2021 dated 23 June 2021 on Changes in Status of Victoria Group Financial Conglomeration to Victoria Financial Group.

Through better risk management, in accordance with the business complexity and characteristics of the financial group, it can eventually generate synergies and increase business capacity and capital. In order to implement comprehensive and effective risk management, the Coordinating Entity needs to establish an integrated risk management organization within the Victoria Financial Group, among others the Integrated Risk Management Committee in Victoria Financial Group and Integrated Risk Management Unit (SKMRT).

The Integrated Risk Management Unit (SKMRT) is tasked with monitoring risk exposure of Victoria Financial Group members and providing information to the Integrated Risk Management Committee within Victoria Financial Group on matters requiring follow up on the evaluation results from monitoring integrated risk management implementation, with the details as follows.

1. Victoria Financial Group structure chart;
2. Financial data, among others:
  - a. Individual financial data;
  - b. Consolidated financial data; and
  - c. Victoria Financial Group financial data;
 

The financial data information must contain:

    - i. Total assets;
    - ii. Total capital based on actual capital according to the calculation of Integrated Minimum Capital Adequacy Ratio (KPMMT). KPMMT Ratio calculation is a comparison between Victoria Financial Group's total actual capital (*aggregate net equity*) and Victoria Financial Group's total minimum capital (*aggregate regulatory capital requirement*); and
    - iii. Net income;
3. Intragroup transactions, among others:
  - a. Financial transactions;
  - b. Non-financial transactions; and
  - c. Mitigation of intragroup transaction risk.

The integrated risk management in Victoria Financial Group is implemented through a risk-based approach with the following principles:

1. Risk aggregation, which means comprehensive risk assessment based on risks found in Victoria Group financial conglomeration by considering the arising impact on Victoria Financial Group's condition;
2. Holistic, which means risk assessment performed by looking at the link between one factor and another in order to reach a conclusion that gives an overall picture of risks in Victoria Financial Group;

3. Signifikansi/materialitas dan proporsionalitas, yaitu penilaian risiko dilakukan dengan memperhatikan signifikansi/materialitas risiko secara proporsional pada Grup Keuangan Victoria secara keseluruhan dengan memperhatikan struktur, karakteristik, dan kompleksitas dari Grup Keuangan Victoria; dan
4. Komprehensif dan terstruktur, yaitu penilaian risiko dilakukan dengan analisis mendalam dengan memperhatikan faktor-faktor penilaian secara luas, lengkap, dan utuh.

**Pilar Penerapan Manajemen Risiko Grup Keuangan Victoria Secara Terintegrasi**

**1. Pengawasan Dewan Komisaris dan Direksi Entitas Koordinator**

Dewan Komisaris dan Direksi Entitas Koordinator memastikan atas efektivitas penerapan Manajemen Risiko dalam Grup Keuangan Victoria.

Selain melaksanakan wewenang dan tanggung jawab dalam rangka penerapan manajemen risiko Grup Keuangan Victoria, Dewan Komisaris dan Direksi Entitas Koordinator juga tetap melaksanakan wewenang dan tanggung jawabnya dalam rangka penerapan manajemen risiko pada Entitas Koordinator, sesuai dengan ketentuan yang berlaku bagi Entitas Koordinator.

**2. Kecukupan Kebijakan, Prosedur, dan Penetapan Limit**

Kebijakan manajemen risiko Grup Keuangan Victoria merupakan arahan tertulis dalam menerapkan manajemen risiko sesuai dengan karakteristik dan kompleksitas kegiatan dan praktik usaha yang sehat. Dalam mendukung efektivitas penerapan manajemen risiko Grup Keuangan Victoria secara terintegrasi, dimana dalam pelaksanaannya telah dilengkapi dengan Kebijakan Manajemen Risiko Grup Keuangan Victoria yang disesuaikan dengan strategi manajemen risiko dengan memperhatikan tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) atau limit sesuai karakteristik dan kompleksitas usaha Grup Keuangan Victoria.

**3. Kecukupan Proses Identifikasi, Pengukuran, Pemantauan dan Pengendalian serta Sistem Informasi Manajemen Risiko**

Secara berkesinambungan, Grup Victoria dalam konglomerasi keuangan terus menyempurnakan proses manajemen risiko secara komprehensif. Hal tersebut bertujuan agar informasi yang berpotensi merugikan secara terintegrasi dalam Grup Keuangan Victoria dapat diketahui sedini mungkin, sehingga dapat mengambil tindakan yang memadai untuk memitigasi dampak risiko seminimal mungkin.

Proses identifikasi risiko dilakukan secara proaktif, termasuk dampak yang ditimbulkan. Selanjutnya, dilakukan pengukuran, pemantauan, dan pengendalian terhadap seluruh aktivitas usaha masing-masing Grup Keuangan Victoria yang didukung oleh sistem informasi manajemen risiko secara memadai.

Pada proses manajemen risiko Grup Keuangan Victoria secara terintegrasi, seluruh LJK di dalam Grup Keuangan Victoria saling bersinergi dalam melaksanakan aktivitas bisnis/transaksi dengan tetap mengacu kepada prinsip *arm length* dan pengelolaan yang berbasis risiko.

3. Significance/Materiality and Proportionality, means risk assessment carried out with due regard to the risk significance/materiality in a proportional manner in Victoria Financial Group as a whole, by considering the structure, characteristics, and complexity of Victoria Financial Group; and
4. Comprehensive and Structured, means risk assessment carried out in an in-depth analysis by considering comprehensive, complete, and intact assessment factors.

**Pillars of Integrated Risk Management Implementation of Victoria Financial Group**

**1. Supervision of the Board of Commissioners and Board of Directors of the Coordinating Entity**

The Board of Commissioners and Board of Directors of the Coordinating Entity ensure the effectiveness of Risk Management implementation in Victoria Financial Group.

Apart from exercising authority and responsibilities in order to implement risk management in Victoria Financial Group, the Board of Commissioners and Board of Directors of the Coordinating Entity also exercise their authority and responsibilities in order to implement risk management in the Coordinating Entity, in accordance with the provisions applicable to the Coordinating Entity.

**2. Adequacy of Policies, Procedures, and Limit Establishment**

**The risk management policies of Victoria Financial Group** are written direction in implementing risk management in accordance with the characteristics and complexity of activities and sound business practices. In supporting the effectiveness of integrated risk management implementation in Victoria Financial Group, its implementation has been equipped with Victoria Financial Group Risk Management Policies that are adjusted to the risk management strategies by considering the risk appetite and risk tolerance or limits. according to Victoria Financial Group's business characteristics and complexity.

**3. Adequacy of Process of Risk Identification, Measurement, Monitoring, and Control, as well as Risk Management Information System**

On an ongoing basis, Victoria Group in the financial conglomeration keeps improving its risk management process comprehensively. This is intended so that information on potential harm in an integrated manner within Victoria Financial Group can be detected as early as possible, so that sufficient actions can be taken to mitigate the risk impact to be as minimum as possible.

Risk identification process is performed pro-actively, including all impacts that may be incurred. Thereafter, all business activities of each Victoria Financial Group are measured, monitored, and controlled, with adequate support of risk management information system.

In the integrated risk management process of Victoria Financial Group, all LJKs within Victoria Financial Group are in synergy in carrying out business activities/transactions by still referring to the principle of *arm length* and risk-based management.

#### 4. Sistem Pengendalian Internal terhadap Penerapan Manajemen Risiko Terintegrasi

Melalui fungsi pengendalian internal, Grup Keuangan Victoria senantiasa melakukan upaya-upaya untuk mengelola dan mengendalikan risiko. Dalam rangka melaksanakan pengendalian risiko, Entitas Koordinator memastikan grup keuangan memiliki metode *risk base approach* untuk mengendalikan risiko atas risiko yang dapat membahayakan kelangsungan usaha grup keuangan.

Secara umum, pengendalian internal terdiri dari serangkaian prosedur atau proses yang memastikan organisasi tetap pada jalurnya untuk mencapai tujuan yang ditetapkan. Adapun proses pengendalian aktivitas operasional masing-masing Grup Keuangan Victoria dilakukan melalui tindakan-tindakan pengendalian pada setiap tindakan dalam struktur organisasi. Hal tersebut bertujuan untuk memastikan:

- a. Kepatuhan terhadap kebijakan atau ketentuan internal serta peraturan perundang-undangan yang berlaku;
- b. Tersedianya informasi keuangan dan manajemen yang lengkap, akurat, tepat guna, dan tepat waktu; serta
- c. Efektivitas budaya risiko (*risk culture*) pada organisasi grup keuangan secara menyeluruh.

Penjelasan di atas tertuang dalam Surat Keputusan Direksi No. 003/SK-DIR/08/21 tanggal 20 Agustus 2021 tentang Kebijakan dan Pedoman Umum Manajemen Risiko Grup Keuangan Victoria.

#### Struktur Organisasi dan Keanggotaan Manajemen Risiko Grup Keuangan Victoria

Terkait dengan penerapan manajemen risiko terintegrasi dalam Grup Keuangan Victoria, maka Entitas Koordinator telah membentuk:

1. Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria; dan
2. Satuan Kerja Manajemen Risiko Terintegrasi.

#### Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria

Uraian terkait Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria dapat dilihat pada bab Tata Kelola Perusahaan pada Laporan Tahunan ini.

#### Satuan Kerja Manajemen Risiko Terintegrasi

Satuan Kerja Manajemen Risiko Terintegrasi merupakan pejabat eksekutif yang berada satu tingkat di bawah Direksi yang memimpin satuan kerja operasional dan/atau fungsi/satuan kerja manajemen risiko. Pada Entitas Koordinator, *Risk Management/Integrated Division* dipimpin oleh seorang Kepala Divisi yang bertanggung jawab langsung kepada Direktur Kepatuhan dan Manajemen Risiko.

Satuan Kerja Manajemen Risiko Terintegrasi merupakan satuan kerja independen yang terpisah dengan satuan kerja yang melaksanakan fungsi pengendalian internal dan Satuan Kerja Operasional (*Risk Taking Unit*) pada setiap anggota Grup Keuangan Victoria. Selain itu, dalam penerapan manajemen risiko secara terintegrasi dalam Grup Keuangan Victoria harus bebas dari benturan kepentingan antara anggota Grup Keuangan Victoria dengan Entitas Koordinator.

#### 4. Internal Control System on Integrated Risk Management Implementation

Through internal control function, Victoria Financial Group always makes efforts to manage and control the risks. In order to implement risk control, the Coordinating Entity ensures that the financial group has a risk-based approach method to control risks for risks that may endanger the financial group's business continuity.

In general, internal control consists of a set of procedures or processes that ensure the organization stays on track to achieve its stated objectives. The operational activity control process of each member of Victoria Financial Group is carried out through control activities in every action within the organization structure. This is carried out with intention to ensure:

- a. Compliance with internal policies and provisions, and the applicable laws and regulations;
- b. The availability of financial and management information that is complete, accurate, appropriate, and timely; and
- c. The effectiveness of risk culture in the financial group organization in overall.

The aforementioned explanation is contained in the Board of Directors' Decision Letter No. 003/SK-DIR/08/21 dated 20 August 2021 on Risk Management Policies and General Guidelines of Victoria Financial Group.

#### Organizational Structure and Composition of Victoria Financial Group Risk Management

In relation to the integrated risk management implementation within Victoria Financial Group, the Coordinating Entity has established:

1. Integrated Risk Management Committee within Victoria Financial Group; and
2. Integrated Risk Management Work Unit.

#### Integrated Risk Management Committee in Victoria Financial Group

Description of the Financial Group Risk Management Committee can be found in the Corporate Governance chapter of this Annual Report.

#### Integrated Risk Management Work Unit

The Integrated Risk Management Work Unit is the executive officer of one level below the Board of Director, who is in charge of an operational work unit and/or risk management function/work unit. In the Coordinator Entity, the Risk Management/Integrated Division is led by a Division Head who is directly responsible to the Director of Compliance and Risk Management.

The Integrated Risk Management Work Unit is an independent work unit separated from the work unit performing the internal control function and operational work unit (risk taking unit) in each member of Victoria Group financial conglomeration. Furthermore, implementation of integrated risk management shall be free from conflict of interest among members of Victoria Group financial conglomeration and the Main Entity.



**Tabel Utama (Key Metrics) - Bank secara Konsolidasi dengan Entitas Anak**  
Main Table (Key Metrics) - Bank, Consolidated with Subsidiaries

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	Periode Period				Description	
		31 Desember 2021 31 December 2021	30 September 2021 30 September 2021	30 Juni 2021 30 June 2021	31 Maret 2021 31 March 2021		31 Desember 2020 31 December 2020
<b>Modal yang Tersedia (Nilai)</b>							
1	Modal Inti Utama (CET1)	2,339,061	2,008,322	2,061,859	1,960,341	2,195,351	Available Capital Common Equity Tier 1 (CET1)
2	Modal Inti (Tier 1)	2,339,061	2,008,322	2,061,859	1,960,341	2,195,351	Tier 1 Capital
3	Total Modal	3,175,147	2,881,367	2,961,502	2,876,989	3,117,611	Total Capital
<b>Aset Tertimbang Menurut Risiko (ATMR) (Nilai)</b>							
4	Total Aset Tertimbang Menurut Risiko (ATMR)	17,848,543	17,648,938	17,964,792	17,627,389	18,661,505	Risk Weighted Assets (Value) Total Risk Weighted Assets (RWA)
<b>Rasio Modal Berbasis Risiko dalam Bentuk Persentase dari ATMR</b>							
5	Rasio CET1 (%)	13.11	11.38	11.48	11.12	11.63	Risk Based Capital Ratio as Percentage of RWA CET 1 Ratio (%)
6	Rasio Tier 1 (%)	13.11	11.38	11.48	11.12	11.63	Tier 1 Ratio (%)
7	Rasio Total Modal (%)	17.79	16.33	16.49	16.32	16.71	Total Capital Ratio (%)
<b>Tambahan CET1 yang Berfungsi sebagai Buffer dalam Bentuk Persentase dari ATMR*</b>							
8	Capital Conservation Buffer (2.5% dari ATMR) (%)						Additional CET 1 Functions as Buffer in the Form of Percentage of RWA*
9	Countercyclical Buffer (0 - 2.5% dari ATMR) (%)						Capital Conservation Buffer (2.5% from RWA) (%) Countercyclical Buffer (0-2.5% from RWA) (%)
10	Capital Surcharge untuk Bank Sistemik (1% - 2.5%) (%)						Capital Surcharge for Systemic Bank (1%-2.5%) (%)
11	Total CET1 sebagai Buffer						Total CET 1 as Buffer
12	Komponen CET1 untuk Buffer						CET 1 Components for Buffer
<b>Rasio Pengungkit Sesuai Basel 3*</b>							
13	Total Eksposur	25,355,175	24,828,282	24,984,882	24,593,849	26,467,471	Leverage Ratio according to Basel 3* Total Exposures
14	a. Nilai Rasio Pengungkit, Termasuk Dampak dari Penyesuaian terhadap Pengeluaran Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan GWM (Jika Ada) (%)	9.70	8.32	8.44	8.16	8.62	a. Leverage Ratio, Including the Impact of Adjustments to the Temporary Exemption on Current Account Placements with Bank Indonesia in Order to Comply with the Statutory Reserve Requirement (if Any) (%)
14	b. Nilai Rasio Pengungkit, Tidak Termasuk Dampak dari Penyesuaian terhadap Pengeluaran Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan GWM (Jika Ada) (%)	9.48	8.13	8.25	7.97	8.44	b. Leverage Ratio, Excluding the Impact of Adjustments to the Temporary Exemption on Current Account Placements with Bank Indonesia in Order to Comply with the Statutory Reserve Requirement (if Any) (%)



No.	Deskripsi	Periode Period				Description	
		31 Desember 2021 31 December 2021	30 September 2021 30 September 2021	30 Juni 2021 30 June 2021	31 Maret 2021 31 March 2021		31 Desember 2020 31 December 2020
14	c. Nilai Rasio Pengungkit, Termasuk Dampak dari Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan GWM (jika ada), yang telah Memasukkan Nilai Rata-Rata dari Nilai Tercatat Aset <i>Securities Financing Transaction</i> (SFT) secara <i>Gross</i> (%)	9.43	8.27	8.44	8.16	8.47	c. Leverage Ratio, Including the Impact of Adjustments to the Temporary Exemption on Current Account Placements with Bank Indonesia in Order to Comply with the Statutory Reserve Requirement (if Any), which Includes the Average Carrying Value of Securities Financing Transactions (SFT) on a Gross (%)
14	d. Nilai Rasio Pengungkit, Tidak Termasuk Dampak dari Penyesuaian Terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan GWM (jika ada), yang telah Memasukkan Nilai Rata-Rata dari Nilai Tercatat Aset secara <i>Gross</i> (%)	9.22	8.09	8.25	7.97	8.29	d. Leverage Ratio, Excluding the Impact of Adjustments to the Temporary Exemption on Current Account Placements with Bank Indonesia in Order to Comply with the Statutory Reserve Requirement (if Any), which Includes the Average Carrying Value of Securities Financing Transactions (SFT) on a Gross (%)
	Rasio Kecukupan Likuiditas (LCR)**						Liquidity Adequacy Ratio (LCR)**
15	Total Aset Likuid Berkualitas Tinggi (HQLA)						Total High Quality Liquid Assets (HQLA)
16	Total Arus Kas Keluar Bersih (Net Cash Outflow)						Total Net Cash Outflow
17	LCR (%)						LCR (%)
	Rasio Pendanaan Stabil Bersih (NSFR)***						Net Stable Funding Ratio (NSFR)***
18	Total Pendanaan Stabil yang Tersedia (ASF)						Total Available Stable Funding (ASF)
19	Total Pendanaan Stabil yang Diperlukan (RSF)						Total Required Stable Funding (RSF)
20	NSFR (%)						NSFR (%)

#### Analisis Kualitatif / Qualitative Analysis

Secara konsolidasi, total modal per posisi 31 Desember 2021 sebesar Rp3,17 triliun dengan rasio total modal sebesar 17,79%. Total modal mengalami sedikit peningkatan dibandingkan dengan periode sebelumnya dibulan yang sama. Peningkatan tersebut terjadi pada komponen modal Inti Utama (Tier-1) yang diantaranya pada Agio, Laba tahun berjalan dan Dana Setoran Modal.

Rasio Pengungkit PT Bank Victoria International Tbk secara konsolidasi dengan Entitas Anak per posisi 31 Desember 2021 sebesar 9,22% atau berada diatas minimum 3% sebagaimana yang diwajibkan di Peraturan Otoritas Jasa Keuangan No. 31/POJK.03/2019.

On a consolidated basis, the total capital at 31 December 2021 position was Rp3.17 trillion with a total capital ratio of 17.79%. Total capital increased slightly compared to that of previous period in the same month. The increase occurred in the common equity tier 1 capital, among others, Agio, Income for the Year, and Paid-up Capital Funds.

The Leverage Ratio of PT Bank Victoria International Tbk on a consolidated basis with its Subsidiary as of 31 December 2021 position was 9.22% or above the minimum of 3% as required by the Financial Services Authority Regulation No. 31/POJK.03/2019.

\* Pengungkapan kuantitatif sesuai Peraturan Otoritas Jasa Keuangan No. 31/POJK.03/2019 / Quantitative disclosure according to Financial Services Authority Regulation No. 31/POJK.03/2019

\*\* Pengungkapan kuantitatif sesuai Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 / Quantitative disclosure according to Financial Services Authority Regulation No. 42/POJK.03/2015

\*\*\* Pengungkapan kuantitatif sesuai Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 / Quantitative disclosure according to Financial Services Authority Regulation No. 50/POJK.03/2017

Tabel Perbedaan antara Cakupan Konsolidasi dan Mapping pada Laporan Keuangan sesuai Standar Akuntansi Keuangan dengan Kategori Risiko sesuai dengan Ketentuan Otoritas Jasa Keuangan Kategori Risiko (LI1)

Table of Difference between Consolidated and Mapping Coverage on the Financial Statements in Accordance with the Financial Accounting Standards with Risk Categories in Accordance with the Financial Services Authority Provisions for Risk Category (LI1)

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	Nilai Tercatat sebagaimana Tertantum dalam Publikasi Laporan Keuangan Carrying Values as Stated in the Financial Statements Publication	Nilai Tercatat berdasarkan Prinsip Kehati-hatian Carrying Values based on Prudential Principles	Nilai Tercatat Masing-Masing Risiko Carrying Value of Each Risk				Description
				Sesuai Kerangka Risiko Kredit According to Credit Risk Framework	Sesuai Kerangka Counterparty Credit Risk According to Counterparty Credit Risk Framework	Sesuai Kerangka Sekuritisasi According to Securitization Framework	Sesuai Kerangka Risiko Pasar According to Market Risk Framework	
<b>ASET</b>								
1	Kas	53,929	53,929	-	-	-	-	Cash
2	Penempatan pada Bank Indonesia	828,089	828,089	-	-	-	-	Placements with Bank Indonesia
3	Penempatan pada Bank Lain	1,004,544	1,004,544	-	-	-	-	Placements with Other Banks
4	Tagihan Spot dan Derivatif/Forward	1,732	1,732	-	-	-	1,732	Spot and Derivative/Forward Receivables
5	Surat Berharga yang Dimiliki	5,186,596	4,108,325	-	42,419	-	1,035,852	Marketable Securities Owned
6	Surat Berharga yang Dijual dengan Janji Dibeli Kembali (Repo)	-	-	-	-	-	-	Marketable Securities Sold Under Repurchase Agreements (Repo)
7	Tagihan atas Surat Berharga yang Dibeli dengan Janji Dijual Kembali (Reverse Repo)	690,715	-	690,715	-	-	-	Receivables from Marketable Securities Purchased Under Resale Agreements (Reverse Repo)
8	Tagihan Akseptasi	-	-	-	-	-	-	Acceptance Receivables
9	Kredit yang Diberikan	14,683,105	14,683,105	-	-	-	-	Loans and Financing
10	Pembiayaan Syariah	805,969	805,969	-	-	-	-	Sharia Financing
11	Penyertaan Modal	34,887	34,858	-	-	-	29	Capital Investment
12	Aset Keuangan Lainnya	364,694	364,694	-	-	-	-	Other Financial Assets

No.	Deskripsi	Nilai Tercatat sebagaimana Tercantum dalam Publikasi Laporan Keuangan Carrying Values as Stated in the Financial Statements Publication	Nilai Tercatat berdasarkan Prinsip Kehati-hatian Carrying Values based on Prudential Principles	Nilai Tercatat Masing-Masing Risiko Carrying Value of Each Risk				Description
				Sesuai Kerangka Risiko Kredit According to Credit Risk Framework	Sesuai Kerangka Counterparty Credit Risk According to Counterparty Credit Risk Framework	Sesuai Kerangka Sekuritisasi According to Securitization Framework	Sesuai Kerangka Risiko Pasar According to Market Risk Framework	
13	Cadangan Kerugian Penurunan Nilai Aset Keuangan -/-							Allowance for Impairment Losses on Financial Assets
	a. Surat Berharga yang Dimiliki		(11,109)	-	-	-	-	a. Marketable Securities Owned
	b. Kredit yang Diberikan dan Pembiayaan Syariah	(702,274)	(702,274)	-	-	-	-	b. Loans and Sharia Financing
	c. Lainnya	(1,486)	(1,486)	-	-	-	-	c. Others
14	Aset Tidak Berwujud	22,680	22,680	-	-	-	22,680	Intangible Assets
	Akumulasi Amortisasi Aset Tidak Berwujud -/-	(19,486)	(19,486)	-	-	-	(19,486)	Accumulation of Intangible Assets Amortization
15	Aset Tetap dan Inventaris	599,482	599,482	599,482	-	-	-	Fixed Asset and Inventory
	Akumulasi Penyusutan Aktiva Tetap dan Inventaris -/-	(91,362)	(91,362)	(91,362)	-	-	-	Accumulation of Fixed Asset and Inventory Depreciation
16	Aset Non-Produktif							Non-Earning Assets
	a. Properti Terbengkalai	2,990	2,990	2,990	-	-	-	a. Abandoned Property
	b. A gunan yang Diambil Alih	1,154,057	1,154,057	1,154,057	-	-	-	b. Foreclosed Assets
	c. Rekening Tunda	5,797	5,797	5,797	-	-	-	c. Account on Hold
	d. Aset Antarkantor	-	-	-	-	-	-	d. Inter-office Assets
17	Aset Lainnya	333,594	333,594	31,205	-	-	302,389	Other Assets
	<b>Total Aset</b>	<b>24,947,143</b>	<b>22,870,813</b>	<b>690,715</b>	<b>42,419</b>	<b>1,035,852</b>	<b>307,344</b>	<b>Total Assets</b>

No.	Deskripsi	Nilai Tercatat sebagaimana Tercantum dalam Publikasi Laporan Keuangan Carrying Values as Stated in the Financial Statements Publication	Nilai Tercatat berdasarkan Prinsip Kehati-hatian Carrying Values based on Prudential Principles	Nilai Tercatat Masing-Masing Risiko Carrying Value of Each Risk				Description
				Sesuai Kerangka Risiko Kredit According to Credit Risk Framework	Sesuai Kerangka Counterparty Credit Risk According to Counterparty Credit Risk Framework	Sesuai Kerangka Sekuritisasi According to Securitization Framework	Sesuai Kerangka Risiko Pasar According to Market Risk Framework	
<b>LIABILITAS DAN EKUITAS</b>								
<b>Liabilitas</b>								
18	Giro	1,327,022	-	-	-	-	1,327,022	Current Accounts
19	Tabungan	3,158,543	-	-	-	-	3,158,543	Savings
20	Deposito	14,821,300	-	-	-	-	14,821,300	Time Deposits
21	Uang Elektronik	-	-	-	-	-	-	Electronic Money
22	Liabilitas kepada Bank Indonesia	-	-	-	-	-	-	Liabilities to Bank Indonesia
23	Liabilitas kepada Bank Lain	1,045,673	-	-	-	-	1,045,673	Liabilities to Other Banks
24	Liabilitas Spot dan Derivatif/ Forward	21	-	-	-	-	21	Liabilities of Spot and Derivative/ Forward
25	Liabilitas atas Surat Berharga yang Dijual dengan Janji Dibeli Kembali (Repo)	-	-	-	-	-	-	Liabilities of Marketable Securities Sold Under Repurchase Agreements (Repo)
26	Liabilitas Akseptasi	-	-	-	-	-	-	Acceptance Payables
27	Surat Berharga yang Diterbitkan	498,308	-	-	-	-	498,308	Securities Issued
28	Pinjaman/Pembiayaan yang Diterima	900,212	-	-	-	-	900,212	Borrowings/Financing Received
29	Setoran Jaminan	-	-	-	-	-	-	Security Deposits
30	Liabilitas Antarkantor	-	-	-	-	-	-	Inter Office Liabilities
31	Liabilitas Lainnya	181,640	-	-	-	-	181,640	Other Liabilities
32	Keperlingan Minoritas (Minority Interest)	17	-	-	-	-	17	Minority Interest
<b>Total Liabilitas</b>		<b>21,932,736</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>21,932,736</b>	<b>Total Liabilities</b>

No.	Deskripsi	Nilai Tercatat sebagaimana Tercantum dalam Publikasi Laporan Keuangan Carrying Values as Stated in the Financial Statements Publication	Nilai Tercatat berdasarkan Prinsip Kehati-hatian Carrying Values based on Prudential Principles	Nilai Tercatat Masing-Masing Risiko Carrying Value of Each Risk				Description
				Sesuai Kerangka Risiko Kredit According to Credit Risk Framework	Sesuai Kerangka Counterparty Credit Risk According to Counterparty Credit Risk Framework	Sesuai Kerangka Sekuritisasi According to Securitization Framework	Sesuai Kerangka Risiko Pasar According to Market Risk Framework	
<b>Ekuitas</b>								
33	Modal Disetor							Equity
	a. Modal Dasar		1,400,000	-	-	-	-	Paid-In Capital
	b. Modal yang Belum Disetor -/		(351,287)	-	-	-	1,400,000	a. Authorized Capital
	c. Saham yang Dibeli Kembali (Treasury Stock) -/		-	-	-	-	(351,287)	b. Unpaid-in Capital -/
34	Tambahan Modal Disetor							c. Shares Repurchased (Treasury Stock)
	a. Agio		407,786	-	-	-	-	Additional Paid-in Capital
	b. Disagio -/		-	-	-	-	407,786	a. Agio
	c. Dana Setoran Modal		278,000	-	-	-	-	b. Disagio -/
	d. Lainnya		-	-	-	-	278,000	c. Paid-up Capital Funds
35	Penghasilan Komprehensif Lain							d. Others
	a. Keuntungan		421,712	-	-	-	-	Other Comprehensive Income
	b. Kerugian -/		-	-	-	-	421,712	a. Gain
36	Cadangan							b. Loss -/
	a. Cadangan Umum		186,356	-	-	-	-	Allowance
	b. Cadangan Tujuan		-	-	-	-	186,356	a. General Reserves
								b. Specific Reserves

No.	Deskripsi	Nilai Tercatat sebagaimana Tercantum dalam Publikasi Laporan Keuangan Carrying Values as Stated in the Financial Statements Publication	Nilai Tercatat berdasarkan Prinsip Kehati-hatian Carrying Values based on Prudential Principles	Nilai Tercatat Masing-Masing Risiko Carrying Value of Each Risk				Description
				Sesuai Kerangka Risiko Kredit According to Credit Risk Framework	Sesuai Kerangka Counterparty Credit Risk According to Counterparty Credit Risk Framework	Sesuai Kerangka Sekuritisasi According to Securitization Framework	Sesuai Kerangka Risiko Pasar According to Market Risk Framework	
37	Laba/Rugi						Profit/Loss	
	a. Tahun-Tahun Lalu		790,903	-	-	-	a. Past Years Losses	790,903
	b. Tahun Berjalan		(119,063)	-	-	-	b. Current Year	(119,063)
	c. Dividen yang Dibayarkan Total Ekuitas yang dapat Diatribusikan kepada Pemilik		-	-	-	-	c. Dividend Paid Attributable to Owners	-
	<b>Total Ekuitas</b>		<b>3,014,407</b>	-	-	-	<b>Total Equity</b>	<b>3,014,407</b>
	<b>TOTAL LIABILITAS DAN EKUITAS</b>		<b>24,947,143</b>	-	-	-	<b>TOTAL LIABILITIES AND EQUITY</b>	<b>24,947,143</b>

**Analisis Kualitatif / Qualitative Analysis**

Pada jenis aset keuangan, pemberian kredit dan pembiayaan syariah merupakan aset dengan eksposur terbesar yang memiliki risiko kredit dan risiko pasar. Terkait dengan risiko kredit, atas eksposur tersebut telah diperhitungkan pencadangan sebagaimana ketentuan yang berlaku.

In the type of financial assets, the provision of loans and Islamic financing is the asset with the largest exposure that has credit risk and market risk. In relation to credit risk, the allowance for these exposures has been calculated in accordance with the applicable regulations.



**Tabel Perbedaan Utama antara Nilai Tercatat sesuai Standar Akuntansi Keuangan dengan Nilai Eksposur sesuai dengan Ketentuan Otoritas Jasa Keuangan (LI2)**  
 Table of Key Differences between Carrying Value in Accordance with the Financial Accounting Standards and Exposure Value in Accordance with the Financial Services Authority Regulations (LI2)

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	Total	Kerangka Risiko Kredit Credit Risk Framework	Kerangka Sekuritisasi Securitization Framework	Kerangka Counterparty Credit Risk Framework	Kerangka Risiko Pasar Market Risk Framework	Description
1	Nilai Tercatat Aset sesuai dengan Cakupan Konsolidasi Ketentuan Kehati-hatian (Sebagaimana Dilaporkan pada Tabel LI1)	24,947,143	22,870,813	42,419	690,715	1,035,852	Asset Carrying Value According to the Scope of Consolidated Prudential Provisions (as Reported in Template LI1)
2	Nilai Tercatat Liabilitas sesuai Lingkup sesuai dengan Cakupan Konsolidasi Ketentuan Kehati-hatian (Sebagaimana Dilaporkan pada Tabel LI1)	21,932,736	-	-	-	-	Liability Carrying Value According to the Scope of Consolidated Prudential Provisions (as Reported in Template LI1)
3	Total Nilai Bersih sesuai dengan Cakupan Konsolidasi Ketentuan Kehati-hatian	3,014,407	22,870,813	42,419	690,715	1,035,852	The Total Net Value According to the Scope of Consolidated Prudential Provisions
4	Nilai Rekening Administratif	3,659,152	3,659,152	-	-	-	Administrative Account Value
5	Perbedaan Valuasi	-	-	-	-	-	Difference in Valuation
6	Perbedaan antara Netting Rules, Selain dari yang Termasuk pada Baris 2	-	-	-	-	-	Difference Between Netting Rules, Apart from those Included in Line 2
7	Perbedaan Provisi	-	-	-	-	-	Difference in Provision
8	Perbedaan Prudential Filters	-	-	-	-	-	Difference in Prudential Filters
9	Nilai Eksposur yang Dipertimbangkan, sesuai dengan Cakupan Konsolidasi Ketentuan Kehati-hatian	-	-	-	-	-	The Exposure Value Considered is in Accordance with the Scope of Consolidated Prudential Provisions

**Tabel Penjelasan Mengenai Perbedaan antara Nilai Eksposur sesuai Standar Akuntansi Keuangan dengan Ketentuan Otoritas Jasa Keuangan (LIA)**  
 Table of Explanation on the Differences Between the Exposure Values in accordance with the Financial Accounting Standards and Financial Services Authority Provisions (LIA)

Tidak terdapat perbedaan antara nilai tercatat sesuai standar akuntansi keuangan, sebagaimana dilaporkan pada Laporan Keuangan dan nilai eksposur sesuai ketentuan kehati-hatian.

There is no difference between the carrying value in accordance with financial accounting standards, as reported in the Financial Statements, and the exposure value in accordance with the prudential provisions.

**Tabel Komposisi Permodalan (CC1)**  
Table of Capital Composition (CC1)

(dalam juta Rupiah / in million Rupiah)

No.	Komponen	Individual Individually	Konsolidasian Consolidated	Components
	<b>Modal Inti Utama (Common Equity Tier I)/(CET1: Instrumen dan Tambahan Modal Disetor)</b>			<b>Common Equity Tier I (CET I) Capital Instrument and Additional Paid-in Capital</b>
1	Saham Biasa (Termasuk Stock Surplus)	1,734,499	1,734,499	Common Stock (Including Stock Surplus)
2	Laba Ditahan	681,011	671,840	Retained Earnings
3	Akumulasi Penghasilan Komprehensif Lain (dan Cadangan Lain)	577,648	587,095	Accumulation of Other Comprehensive Income (and Other Reserves)
4	Modal yang Termasuk Phase Out dari CET1	N/A	N/A	Issued Capital Including Phase Out from CET 1
5	Kepentingan Non-Pengendali yang dapat Diperhitungkan		17	Non-controlling Interests that Can Be Calculated
6	CET1 Sebelum Regulatory Adjustment	2,078,799	2,339,061	CET 1 Before Regulatory Adjustment
	<b>CET1: Faktor Pengurang (Regulatory Adjustment)</b>			<b>CET 1 : Deduction Factors (Regulatory Adjustment)</b>
7	Selisih Kurang Jumlah Penyesuaian Nilai Wajar dari Instrumen Keuangan dalam Trading Book	-	-	Deficit in the Amount of Adjustments to the Fair Value of Financial Instruments in the Trading Book
8	Goodwill	-	-	Goodwill
9	Aset Tidak Berwujud Lainnya (Selain Mortgage-Servicing Rights)	(2,190)	(3,194)	Other Intangible Assets (Aside from Mortgage - Servicing Rights)
10	Aset Pajak Tanggungan yang Berasal dari Future Profitability	N/A	N/A	Deferred Tax Assets that Come From Future Profitability
11	Cash-Flow Hedge Reserve	N/A	N/A	Cash-Flow Hedge Reserve
12	Shortfall on Provisions to Expected Losses	N/A	N/A	Shortfall on Provisions to Expected Losses
13	Keuntungan Penjualan Aset dalam Transaksi Sekuritisasi	-	-	Gain on Sale of Asset in Securitization Transactions
14	Peningkatan/Penurunan Nilai Wajar atas Kewajiban Keuangan (DVA)	-	-	Increase/Decrease in Fair Value of Financial Liabilities (DVA)
15	Aset Pensiun Manfaat Pasti	N/A	N/A	Defined Benefit Pension Plan
16	Investasi pada Saham Sendiri (Jika Belum di Net dalam Modal di Laporan Posisi Keuangan)	N/A	N/A	Investment in Own Shares (Before Net in Equity in the Financial Position Report)
17	Kepemilikan Silang pada Instrumen CET1 pada Entitas Lain	-	-	Cross Ownership of CET 1 Instruments in Other Entities
18	Investasi pada Modal Bank, Entitas Keuangan dan Asuransi di Luar Cakupan Konsolidasi Secara Ketentuan, Net Posisi Short yang Diperkenankan, dimana Bank Tidak Memiliki Lebih dari 10% Modal Saham yang Diterbitkan (Jumlah di atas Batasan 10%)	N/A	N/A	Investment in Bank Capital, Financial and Insurance Entities Outside the Scope of Consolidation by Provisions, Net Short Position Allowed, where the Bank Does Not Have More than 10% Issued Share Capital (Amount Above the 10% Limit)
19	Investasi Signifikan pada Saham Biasa Bank, Entitas Keuangan dan Asuransi di Luar Cakupan Konsolidasi secara Ketentuan, Net Posisi Short yang Diperkenankan (Jumlah di atas Batasan 10%)			Significant Investment in Bank's Common Stock, Financial and Insurance Entities Outside the Scope of Consolidation by Provisions, Net Short Position Allowed (Amount Above the 10% Limit)
20	Mortgage Servicing Rights			Mortgage Servicing Rights
21	Aset Pajak Tanggungan yang Berasal dari Perbedaan Temporer (Jumlah di atas Batasan 10%, Net dari Kewajiban Pajak)			Deferred Tax Assets Arising From Temporary Difference (Amount Above the 10% Limit, Net of Tax Obligation)

No.	Komponen	Individual Individually	Konsolidasian Consolidated	Components
22	Jumlah Melebihi Batasan 15%	N/A	N/A	Amount Exceeding the 15% Limit
23	Investasi Signifikan pada Saham Biasa Financials	N/A	N/A	Significant Investment on Common Stock Financials
24	Mortgage Servicing Rights	N/A	N/A	Mortgage Servicing Rights
25	Pajak Tanggahan dari Perbedaan Temporer	N/A	N/A	Deferred Tax from Temporary Difference
26	Penyesuaian berdasarkan Ketentuan Spesifik Nasional			Adjustments based on National Specific Provisions
	a. Selisih PPKA dan CKPN	-	-	a. Difference in PPKA and CKPN
	b. PPKA Non-Produktif	(259,651)	(348,779)	b. Non-Earning PPA
	c. Aset Pajak Tanggahan	(294,914)	(302,389)	c. Deferred Tax Assets
	d. Penyertaan	(357,604)	(29)	d. Investments
	e. Kekurangan Modal pada Perusahaan Anak Asuransi	N/A	N/A	e. Lack of Capital in Insurance Subsidiary
	f. Eksposur Sekuritisasi	-	-	f. Securitization Exposures
	g. Lainnya	-	-	g. Others
27	Penyesuaian pada CET1 Akibat AT1 dan Tier 2 Lebih Kecil daripada Faktor Pengurangannya	-	-	Adjustments to CET 1 Due to Additional Tier (AT) and Tier 2 are Lower than the Deduction Factors
28	Jumlah Pengurang (Regulatory Adjustment) terhadap CET1	(914,359)	(654,391)	Total Deduction (Regulatory Adjustments) to CET 1
29	Jumlah CET1 Setelah Faktor Pengurang	1,164,440	1,684,670	Total CET 1 After Deduction Factors
	<b>Modal Inti Tambahan (AT1): Instrumen</b>			<b>Additional Tier 1 (AT 1): Instrument</b>
30	Instrumen AT 1 yang Diterbitkan oleh Bank (Termasuk Stock Surplus)	-	-	AT 1 Instruments Issued by Banks (Including Stock Surplus)
31	Yang diklasifikasikan sebagai Ekuitas berdasarkan Standar Akuntansi	-	-	Classified as Equity Based on Accounting Standards
32	Yang diklasifikasikan sebagai Liabilitas berdasarkan Standar Akuntansi	-	-	Classified as Liability Based on Accounting Standards
33	Modal yang Termasuk Phase Out dari AT1	N/A	N/A	Capital Included in Phase Out from AT 1
34	Instrumen AT1 yang Diterbitkan oleh Entitas Anak yang Diakui dalam Perhitungan KPMM secara Konsolidasi	-	-	AT 1 Instrument Issued by Subsidiaries Recognized in the Calculation of CAR on a Consolidated Basis
35	Instrumen yang Diterbitkan Entitas Anak yang Termasuk Phase Out	N/A	N/A	Instruments Issued by Subsidiaries Included in Phase Out
36	<b>Jumlah AT1 Sebelum Regulatory Adjustment</b>	-	-	<b>Total AT 1 Before Regulatory Adjustment</b>

No.	Komponen	Individual Individually	Konsolidasian Consolidated	Components
<b>Modal Inti Tambahan: Faktor Pengurang (Regulatory Adjustment)</b>				
37	Investasi pada Instrumen AT1 Sendiri	N/A	N/A	Additional Tier 1: Deduction Factors (Regulatory Adjustment) Invest in Own AT 1 Instrument
38	Kepemilikan Silang pada Instrumen AT1 pada Entitas Lain	-	-	Cross Ownership of Instrument AT 1 in Other Entities
39	Investasi pada Modal Bank, Entitas Keuangan dan Asuransi di Luar Cakupan Konsolidasi secara Ketentuan, Net Posisi Short yang Diperkenankan, dimana Bank Tidak Memiliki Lebih Dari 10% Modal Saham yang Diterbitkan (Jumlah di atas Batasan 10%)	N/A	N/A	Investments in Bank Capital, Financial and Insurance Entities Outside the Scope of Consolidated by Provisions, Net Short Position Allowed, where the Bank does not have more than 10% of the Issued Share Capital (Amount above the 10% Limit)
40	Investasi Signifikan pada Modal Bank, Entitas Keuangan dan Asuransi di Luar Cakupan Konsolidasi secara Ketentuan (Net Posisi Short yang Diperkenankan)	N/A	N/A	Significant Investment in Bank Capital, Financial and Insurance Entities Outside the Scope of Consolidation by Provisions (Net Short Position Allowed)
41	Penyesuaian Berdasarkan Ketentuan Spesifik Nasional			Adjustments Based on National Specific Provisions
	a. Penempatan Dana pada Instrumen AT1 pada Bank Lain	-	-	a. Placement of Funds in AT1 Instruments in Other Banks
42	Penyesuaian pada AT1 akibat Tier 2 Lebih Kecil Daripada Faktor Pengurangnya	-	-	Adjustment to AT 1 due to Tier 2 is Lower than the Deduction Factors
<b>43</b>	<b>Jumlah Faktor Pengurang (Regulatory Adjustment) terhadap AT1</b>	-	-	<b>Total Deduction Factors (Regulatory Adjustments) to AT 1</b>
44	Jumlah AT1 Setelah Faktor Pengurang	-	-	Total AT 1 After Deduction Factors
45	<b>Jumlah Modal Inti (Tier 1) (CET1 + AT1)</b>	1,164,440	1,684,670	<b>Total Core Capital (Tier 1) (CET 1 + AT 1)</b>
<b>Modal Pelengkap (Tier 2): Instrumen dan Cadangan</b>				
46	Instrumen Tier 2 yang Diterbitkan oleh Bank (Termasuk Stock Surplus)	677,500	677,500	Tier 2 Instruments Issued by Banks (Including Stock Surplus)
47	Modal yang Termasuk Phase Out dari Tier 2	N/A	N/A	Capital Included in Phase Out from Tier 2
48	Instrumen Tier 2 yang Diterbitkan oleh Entitas Anak yang Diakui dalam Perhitungan KPMM secara Konsolidasi	-	-	Tier 2 Instrument Issued by Subsidiaries Recognized in the Calculation of CAR on a Consolidated Basis
49	Modal yang diterbitkan Entitas Anak yang Termasuk Phase Out	N/A	N/A	Capital Issued by Subsidiaries Included in Phase Out
50	Cadangan Umum PPKA atas Aset Produktif yang Wajib Dihitung dengan Jumlah Paling Tinggi Sebesar 1,25% dari ATMR untuk Risiko Kredit	151,219	158,586	General Reserves of PPKA on Earning Assets that must be Calculated at the Highest Amount of 1.25% from RWA for Credit Risk
<b>51</b>	<b>Jumlah Modal Pelengkap (Tier 2) Sebelum Faktor Pengurang</b>	<b>828,719</b>	<b>836,086</b>	<b>Total Supplementary Capital (Tier 2) Before Deduction Factors</b>
<b>Modal Pelengkap (Tier 2): Faktor Pengurang (Regulatory Adjustment)</b>				
52	Investasi pada Instrumen Tier 2 Sendiri	N/A	N/A	Invest in Own Tier 2 Instrument
53	Kepemilikan Silang pada Instrumen Tier 2 pada Entitas Lain	N/A	N/A	Cross Ownership in Tier 2 Instruments in Other Entities
54	Investasi pada Kewajiban TLAC Modal Bank, Entitas Keuangan dan Asuransi di Luar Cakupan Konsolidasi Secara Ketentuan, Net Posisi Short yang Diperkenankan, dimana Bank Tidak Memiliki Lebih Dari 10% Modal Saham yang Diterbitkan; Nilai Sebelumnya Ditetapkan dengan Threshold 5% Namun Tidak Lagi Memenuhi Kriteria (untuk Bank Sistemik)	N/A	N/A	Investments in TLAC Liabilities of Bank Capital, Financial and Insurance Entities Outside the Scope of Consolidation by Provisions, Net Short Position Allowed, where the Bank does not have more than 10% of the Issued Share Capital; Value Previously Set with a Threshold Of 5% but no Longer Meets the Criteria (for GSIB Banks)
55	Investasi Signifikan pada Modal atau Instrumen TLAC Bank, Entitas Keuangan dan Asuransi di Luar Cakupan Konsolidasi Secara Ketentuan (Net Posisi Short yang Diperkenankan)	N/A	N/A	Significant Investment in Capital or TLAC Instruments of Bank, Financial and Insurance Entities Outside the Scope of Consolidation by Provisions (Net Short Position Allowed)

No.	Komponen	Individual Individually	Konsolidasian Consolidated	Components
56	Penyesuaian berdasarkan Ketentuan Spesifik Nasional			Adjustments based on National Specific Provisions
	a. <i>Sinking Fund</i>	-	-	a. <i>Sinking Fund</i>
	b. Penempatan Dana pada Instrumen Tier 2 pada Bank Lain	-	-	b. Placement of Funds in Tier 2 Instruments At Other Banks
57	Jumlah Faktor Pengurang (Regulatory Adjustment) Modal Pelengkap	-	-	Total Deduction Factors (Regulatory Adjustments) Supplementary Capital
58	Jumlah Modal Pelengkap (Tier 2) setelah Regulatory Adjustment	828,719	836,086	Total Supplementary Capital (Tier 2) after Regulatory Adjustment
59	Total Modal (Modal Inti + Modal Pelengkap)	1,993,159	2,520,756	Total Capital (Core Capital + Supplementary Capital)
60	Total Aset Tertimbang Menurut Risiko (ATMR)	16,626,765	17,848,543	Total Risk Weighted Assets (RWA)
	<b>Rasio Kecukupan Pemenuhan Modal Minimum (KPMIM) dan Tambahan Modal (Capital Buffer)</b>			<b>Capital Adequacy Ratio (CAR) and Additional Capital (Capital Buffer)</b>
61	Rasio CET1 (Persentase terhadap ATMR) (%)	12.50	13.11	Common Equity Tier (CET1) Ratio - Percentage to RWA (%)
62	Rasio Modal Inti Tier 1 (Persentase terhadap ATMR) (%)	12.50	13.11	Common Equity Tier (Tier 1) Ratio - Percentage to RWA (%)
63	Rasio Total Modal (Persentase terhadap ATMR) (%)	17.49	17.79	Total Capital Ratio - Percentage to RWA (%)
64	Buffer (Persentase terhadap ATMR)	N/A	N/A	Buffer (Percentage to RWA)
65	Capital Conservation Buffer	N/A	N/A	Capital Conservation Buffer
66	Countercyclical Buffer	N/A	N/A	Countercyclical Buffer
67	Higher Loss Absorbency Requirement	N/A	N/A	Higher Loss Absorbency Requirement
68	Untuk Bank Umum Konvensional: CET1 yang Tersedia untuk Memenuhi Buffer (Persentase terhadap ATMR) Untuk Kantor Cabang dari Bank yang Berkedudukan di Luar Negeri: Bagian Dana Usaha yang Ditempatkan dalam CEIMA (Diungkapkan sebagai Persentase dari ATMR) yang Tersedia untuk Memenuhi Buffer	-	-	For Conventional Commercial Banks: CET1 Available to Meet the Buffer (Percentage against RWA) for Branch Offices of Banks Domiciled Overseas: Share of Business Funds Placed in CEIMA (Expressed as a Percentage of RWA) that is Available to Meet Buffers
	<b>National Minimal (Jika Berbeda dari Basel 3)</b>			<b>National Minimal (if Different from Basel 3)</b>
69	Rasio Terendah CET1 Nasional (Jika Berbeda dengan Basel 3)	N/A	N/A	National CET1 Lowest Ratio (if Different from Basel 3)
70	Rasio Terendah Tier 1 Nasional (Jika Berbeda dengan Basel 3)	N/A	N/A	National Tier 1 Lowest Ratio (if Different from Basel 3)
71	Rasio Terendah Total Modal Nasional (Jika Berbeda dengan Basel 3)	N/A	N/A	Total National Capital Lowest Ratio (if Different from Basel 3)

No.	Komponen	Individual Individually	Konsolidasian Consolidated	Components
<b>Jumlah di Bawah Batasan Pengurangan (Sebelum Pembobotan Risiko)</b>				
72	Investasi Non-Signifikan pada Modal atau Kewajiban TLAC Lainnya pada Entitas Keuangan Lain	N/A	N/A	Total Below the Deduction Limit (Before Risk Weighting) Non-Significant Investment in Capital or Other Tlac Liabilities of Other Financial Entities
73	Investasi Signifikan pada Saham Biasa Entitas Keuangan	N/A	N/A	Significant Investments in Common Stock Financials
74	Mortgage Servicing Rights (Net dari Kewajiban Pajak)	N/A	N/A	Mortgage Servicing Rights (Net of Tax Obligation)
75	Aset Pajak Tanggungan yang Berasal dari Perbedaan Temporer (Net dari Kewajiban Pajak)	N/A	N/A	Deferred Tax Assets Arising from Temporary Difference (Net of Tax Obligation)
<b>Cap yang Dikenakan untuk Provisi pada Tier 2</b>				
76	Provisi yang Dapat Diakui sebagai Tier 2 Sesuai dengan Eksposur Berdasarkan Pendekatan Standar (Sebelum Dikenakan Cap)	N/A	N/A	Cap Imposed for Tier 2 Provision Provisions that can be Recognized as Tier 2 are in Accordance with the Exposure based on the Standardized Approach (Before Cap)
77	Cap atas Provisi yang Diakui sebagai Tier 2 Berdasarkan Pendekatan Standar	N/A	N/A	Cap on Provisions Recognized as Tier 2 based on the Standardized Approach
78	Provisi yang dapat Diakui sebagai Tier 2 sesuai dengan Eksposur berdasarkan Pendekatan IRB (Sebelum Dikenakan Cap)	N/A	N/A	Provisions that can be Recognized as Tier 2 are in Accordance with the Exposure based on the IRB Approach (Before Cap)
79	Cap atas Provisi yang Diakui sebagai Tier 2 berdasarkan Pendekatan IRB	N/A	N/A	Cap on Provisions Recognized as Tier 2 based on the IRB Approach
<b>Instrumen Modal yang Termasuk Phase Out (Hanya Berlaku Antara 1 Januari 2018 s.d. 1 Januari 2022)</b>				
80	Cap pada CET1 yang termasuk Phase Out	N/A	N/A	Capital Instrument Included in Phase Out (Only Valid from 1 January 2018 to 1 January 2022) Cap on CET 1 Included in Phase Out
81	Jumlah yang Dikecualikan dari CET1 karena Adanya Cap (Kelebihan di Atas Cap Setelah Redemptions dan Maturities)	N/A	N/A	Total Excluded from CET 1 due to Cap (Excess Over Cap After Redemptions and Maturities)
82	Cap pada AT1 yang Termasuk Phase Out	N/A	N/A	Cap on at 1 Included in Phase Out
83	Jumlah yang Dikecualikan dari AT1 karena Adanya Cap (Kelebihan di Atas Cap Setelah Redemptions dan Maturities)	N/A	N/A	Total Excluded from at 1 due to Cap (Excess Over Cap After Redemptions and Maturities)
84	Cap pada Tier 2 yang termasuk Phase Out	N/A	N/A	Cap on Tier 2 Included in Phase Out
85	Jumlah yang Dikecualikan dari Tier 2 karena Adanya Cap (Kelebihan di Atas Cap Setelah Redemptions dan Maturities)	N/A	N/A	Total Excluded from Tier 2 due to Cap (Excess Over Cap After Redemptions and Maturities)

**Analisis Kualitatif / Qualitative Analysis**

Pada jenis aset keuangan, pemberian kredit dan pembiayaan syariah merupakan aset dengan eksposur terbesar yang memiliki risiko kredit dan risiko pasar. Terkait dengan risiko kredit, atas eksposur tersebut telah dihitung pencadangan sebagai ketentuan yang berlaku.

On the type of financial assets, the provision of loans and sharia financing is the asset with the largest exposure that has credit risk and market risk. Related to credit risk, reserve for such exposure has been calculated according to the applicable regulations.



**Tabel Rekonsiliasi Permodalan (CC2)**  
Table of Capital Reconciliation (CC2)

(dalam juta Rupiah / in million Rupiah)

No.	Pos-Pos	31 Desember 2021 / 31 December 2021		Posts
		Individual Individually	Konsolidasian Consolidated	
<b>ASET</b>				
1	Kas	52,685	53,929	Cash
2	Penempatan pada Bank Indonesia	780,689	828,089	Placements with Bank Indonesia
3	Penempatan Pada Bank Lain	827,749	1,004,544	Placement with Other Banks
4	Tagihan Spot dan Derivatif/Forward	1,732	1,732	Spot and Derivative/Forward Receivables
5	Surat Berharga yang Dimiliki	4,648,564	5,186,596	Marketable Securities Owned
6	Surat Berharga yang Dijual dengan Janji Dibeli Kembali (Repo)	-	-	Marketable Securities Sold Under Repurchase Agreements (Repo)
7	Tagihan atas Surat Berharga yang Dibeli dengan Janji Dijual Kembali (Reverse Repo)	690,715	690,715	Receivables from Marketable Securities Purchased Under Resale Agreements (Reverse Repo)
8	Tagihan Akseptasi	-	-	Acceptance Receivables
9	Kredit yang Diberikan	14,683,105	14,683,105	Loans and Financing
10	Pembiayaan Syariah	-	805,969	Sharia Financing
11	Penyertaan Modal	392,462	34,887	Capital Investment
12	Aset Keuangan Lainnya	351,021	364,694	Other Financial Assets
13	Cadangan Kerugian Penurunan Nilai Aset Keuangan -/-			Allowance for Impairment Losses on Financial Assets -/-
	a. Surat Berharga yang Dimiliki	(11,109)	(11,109)	a. Marketable Securities Owned
	b. Kredit yang Diberikan dan Pembiayaan Syariah	(651,503)	(702,274)	b. Loans and Sharia Financing
	c. Lainnya	(1,486)	(1,486)	s. Others
14	Aset Tidak Berwujud	14,650	22,680	Intangible Assets
	Akumulasi Amortisasi Aset Tidak Berwujud -/-	(12,460)	(19,486)	Accumulation of Intangible Assets Amortization -/-
15	Aset Tetap dan Inventaris	581,539	599,482	Fixed Asset and Inventory
	Akumulasi Penyusutan Aktiva Tetap dan Inventaris -/-	(77,950)	(91,362)	Accumulation of Fixed Asset and Inventory Depreciation -/-
16	Aset Non-Produktif			Non-Earning Assets
	a. Properti Terbengkalai	2,862	2,990	a. Abandoned Property
	b. Agunan yang Diambil Alih	1,064,929	1,154,057	b. Foreclosed Assets
	c. Rekening Tunda	5,797	5,797	c. Account on Hold
	d. Aset Antarkantor	-	-	d. Inter-office Assets
17	Aset Lainnya	315,950	333,594	Other Assets
<b>Total Aset</b>		<b>23,659,941</b>	<b>24,947,143</b>	<b>Total Assets</b>



No.	Pos-Pos	31 Desember 2021 / 31 December 2021		Posts
		Individual Individually	Konsolidasian Consolidated	
35	Penghasilan Komprehensif Lain			Other Comprehensive Income
	a. Keuntungan	418,356	421,712	a. Gain
	b. Kerugian -/-	-	-	b. Loss -/-
36	Cadangan			Allowance
	a. Cadangan Umum	177,200	186,356	a. General Reserves
	b. Cadangan Tujuan	-	-	b. Specific Reserves
37	Laba/Rugi			Profit/Loss
	a. Tahun-Tahun Lalu	800,075	790,903	a. Past Years Losses
	b. Tahun Berjalan	(119,063)	(119,063)	b. Current Year
	c. Dividen yang Dibayarkan -/- Total Ekuitas yang dapat Diatribusikan kepada Pemilik	-	-	c. Dividend Paid -/- Total Equity Attributable to Owners
	<b>Total Ekuitas</b>	<b>3,011,067</b>	<b>3,014,407</b>	<b>Total Equity</b>
	<b>Total Liabilitas dan Ekuitas</b>	<b>23,659,941</b>	<b>24,947,143</b>	<b>Total Liabilities and Equity</b>

**Tabel Fitur Utama Instrumen Permodalan dan Instrumen TLAC - Eligible (CCA)**  
**Table of Key Features of Capital Instrument and TLAC Instrument - Eligible (CCA)**

(dalam juta Rupiah / in million Rupiah)

No.	Pertanyaan Questions	Informasi Kuantitatif/Kualitatif Quantitative/Qualitative Information			
		PT Bank Victoria International Tbk	PT Bank Victoria International Tbk	PT Bank Victoria International Tbk	PT Bank Victoria International Tbk
1	Penerbit Issuer	PT Bank Victoria International Tbk	PT Bank Victoria International Tbk	PT Bank Victoria International Tbk	PT Bank Victoria International Tbk
2	Nomor Identifikasi Identification Number	BVIC	BVIC01SBCN1	BVIC02SBCN1	BVIC02SBCN3
3	Hukum yang Digunakan Laws Applied	Hukum Indonesia Indonesian Laws	Hukum Indonesia Indonesian Laws	Hukum Indonesia Indonesian Laws	Hukum Indonesia Indonesian Laws
4	Pada Saat Masa Transisi During Transition Period	N/A	N/A	N/A	N/A
5	Setelah Masa Transisi After Transition Period	CET 1	Tier 2	Tier 2	Tier 2
6	Apakah Instrumen Eligible untuk Individu/ Konsolidasi atau Konsolidasi dan Individu Is the Instrument Eligible for Solo/Group or Group and Solo	Individu Individual	Individu Individual	Individu Individual	Individu Individual
7	Jenis Instrumen Type of Instrument	Saham Biasa Common Stock	Obligasi Subordinasi Subordinated Bonds	Obligasi Subordinasi Subordinated Bonds	Obligasi Subordinasi Subordinated Bonds
8	Jumlah yang Diakui dalam Perhitungan KPMM Total Recognized in CAR Calculation	1,048,713	303,333	250,000	60,000
9	Nilai Par dari Instrumen Par Value of the Instrument	114	303,333	250,000	60,000
10	Klasifikasi Sesuai Standar Akuntansi Keuangan Accounting Classification	Ekuitas Equity	Liabilitas - Biaya Perolehan Amortisasi Liabilities - Amortization of Acquisition Cost	Liabilitas - Biaya Perolehan Amortisasi Liabilities - Amortization of Acquisition Cost	Liabilitas - Biaya Perolehan Amortisasi Liabilities - Amortization of Acquisition Cost
11	Tanggal Penerbitan Issuance Date	4 Juni 1999 4 June 1999	5 Juni 2018 5 June 2018	28 Juni 2019 28 June 2019	1 April 2020
12	Tidak Ada Jatuh Tempo (Perpetua) Atau dengan Jatuh Tempo No Maturity (Perpetual) or with Maturity	Perpetual Perpetual	Dengan Jatuh Tempo With Maturity	Dengan Jatuh Tempo With Maturity	Dengan Jatuh Tempo With Maturity
13	Tanggal Jatuh Tempo Maturity Date	N/A	5 Juni 2025 5 June 2025	28 Juni 2026 28 June 2026	1 April 2027
14	Esekusi Call Option atas Persetujuan Otoritas Jasa Keuangan Execution of Call Option under Approval of Bank Supervisor	Tidak No	Tidak No	Tidak No	Tidak No

No.	Pertanyaan Questions	Informasi Kuantitatif/Kualitatif Quantitative/Qualitative Information									
15	Tanggal Call Option, Jumlah Penarikan dan Persyaratan Call Option Lainnya (Bila Ada) Call Option Date, Withdrawal Amount, and Other Call Option Requirements (If Any)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
16	Subsequent Call Option	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
17	Kupon/Dividen Coupons/Dividends	Kupon Coupon	Kupon Coupon	Kupon Coupon	Kupon Coupon	Kupon Coupon	Kupon Coupon	Kupon Coupon	Kupon Coupon	Kupon Coupon	Kupon Coupon
18	Dividen/Kupon dengan Bunga Tetap atau Floating Dividends/Coupons with Fixed or Floating Interest	Dividen Dividen	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed
19	Tingkat dari Coupon Rate atau Index Lain yang Menjadi Acuan Rating of Coupon Rate or Other Referral Index	Floating	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed
20	Ada atau Tidaknya Dividend Stopper Any Dividend Stopper or Not	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No
21	Apakah Terdapat Fitur Step Up atau Insentif Lain Are There Any Step Up Feature or Other Incentives	Fully discretionary	Partial Discretionary	Partial Discretionary	Partial Discretionary	Partial Discretionary	Partial Discretionary	Partial Discretionary	Partial Discretionary	Partial Discretionary	Partial Discretionary
22	Non-Kumulatif atau Kumulatif Non-Cumulative or Cumulative	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No
23	Dapat Dikonversi atau Tidak dapat Dikonversi Convertible or Non-Convertible	Non-Kumulatif Non-Cumulative	Kumulatif Cumulative	Kumulatif Cumulative	Kumulatif Cumulative	Kumulatif Cumulative	Kumulatif Cumulative	Kumulatif Cumulative	Kumulatif Cumulative	Kumulatif Cumulative	Kumulatif Cumulative
24	Jika dapat Dikonversi, Sebutkan Trigger Point-nya If Convertible, State the Trigger Point	Tidak dapat Dikonversi Non-Convertible	Tidak dapat Dikonversi Non-Convertible	Tidak dapat Dikonversi Non-Convertible	Tidak dapat Dikonversi Non-Convertible	Tidak dapat Dikonversi Non-Convertible	Tidak dapat Dikonversi Non-Convertible	Tidak dapat Dikonversi Non-Convertible	Tidak dapat Dikonversi Non-Convertible	Tidak dapat Dikonversi Non-Convertible	Tidak dapat Dikonversi Non-Convertible
25	Jika dapat Dikonversi, Sebutkan Trigger Point-nya If Convertible, State the Trigger Point	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	Jika dapat Dikonversi, Sebutkan Trigger Point-nya If Converted, How is the Conversion Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
27	Jika dapat Dikonversi, Sebutkan Trigger Point-nya If Converted, is it Mandatory or Optional	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
28	Jika dapat Dikonversi, Sebutkan Trigger Point-nya If Converted, State the Type of Conversion Instrument	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
29	Jika dapat Dikonversi, Sebutkan Trigger Point-nya If Converted, State the Issuer of Instrument it Converts into	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
30	Fitur Write-Down Write-Down Feature	Tidak No	Ya Yes	Ya Yes	Ya Yes	Ya Yes	Ya Yes	Ya Yes	Ya Yes	Ya Yes	Ya Yes

No.	Pertanyaan Questions	Informasi Kuantitatif/Kualitatif Quantitative/Qualitative Information					
		N/A	**	Bisa Penuh atau Sebagian Can be Full or Partial	**	Bisa Penuh atau Sebagian Can be Full or Partial	**
31	Jika Terjadi Write-Down, Sebutkan Trigger-nya If Write-Down, State the Trigger	N/A	**	Bisa Penuh atau Sebagian Can be Full or Partial	**	Bisa Penuh atau Sebagian Can be Full or Partial	**
32	Jika Terjadi Write-Down, Apakah Penuh atau Sebagian If Write-Down, Full or Partial	N/A	**	Bisa Penuh atau Sebagian Can be Full or Partial	**	Bisa Penuh atau Sebagian Can be Full or Partial	**
33	Jika Terjadi Write Down; Permanen atau Temporer If Write-Down, Permanent or Temporary	N/A	N/A	N/A	N/A	N/A	N/A
34	Jika Terjadi Write Down Temporer, Jelaskan Mekanisme Write-Up If Write-Down is Temporary, Explain the Write Up Mechanism	N/A	N/A	N/A	N/A	N/A	N/A
35	Hierarki Instrumen pada saat Likuidasi Instrument Hierarchy during Liquidation	*)	***	Tidak No	***	Tidak No	***
36	Apakah Terdapat Fitur yang Non-Compliant Is the Transition for Non-Compliant Feature	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No
37	Jika Ya, Jelaskan Fitur yang Non-Compliant If Yes, Explain the Non-Compliant Feature	N/A	N/A	N/A	N/A	N/A	N/A

**Analisis Kualitatif/ Qualitative Analysis**

- \*) Pada saat likuidasi Pemegang Saham hanya akan memperoleh pengembalian investasinya jika seluruh kreditur Bank telah memperoleh pembayaran dan masih terdapat sisa harta Bank.
- \*\*\*) Dalam hal Perseroan berpotensi terganggu usaha (*point of non-viability*), Perseroan akan menerapkan mekanisme *write down* sesuai dengan Pasal 19 Peraturan Otoritas Jasa Keuangan No. 11/2016 tanpa memerlukan persetujuan dari Pemegang Obligasi Subordinasi atau tanpa memerlukan keputusan RUPOS.
- \*\*\*) Dalam hal terjadi penutupan usaha atau disolusi atau likuidasi Perseroan karena alasan lain apapun, pembagian harta kekayaan Emiten hasil Likuidasi untuk pembayaran jumlah terhutang oleh Perseroan kepada Pemegang Obligasi Subordinasi dilakukan sesuai urutan sebagaimana tersebut dalam perjanjian perwaliamatan, dan hanya akan dibayarkan setelah dipenuhinya seluruh kewajiban pembayaran Perseroan kepada para kreditur preferen, nasabah penyimpan, dan para kreditur hutang senior, sesuai dengan peraturan perundang-undangan yang berlaku di Negara Republik Indonesia.
- \*) At the time of liquidation, Shareholders will only receive a return on their investment if all of the Bank's creditors have received payment and there are still remaining assets of the Bank.
- \*\*\*) In the event that the Company has the potential of business disruption (*point of non-viability*), the Company will apply a write down mechanism in accordance with Article 19 of Financial Services Authority Regulation No. 11/2016 without requiring approval from Subordinated Bondholders or without requiring a RUPOS decision.
- \*\*\*) In the event of a business closure or dissolution or liquidation of the Company for any other reason, the distribution of the Issuer's assets resulting from the liquidation for payment of the amount owed by the Company to the Subordinated Bondholders shall be carried out in the order as stated in the trustee agreement, and will only be paid after all payment obligations of the Company are fulfilled to preferred creditors, depositors, and senior debt creditors, in accordance with the prevailing laws and regulations in the Republic of Indonesia.



**Tabel Laporan Kewajiban Pemenuhan Rasio Pengungkit**  
Table of Mandatory Fulfillment of Leverage Ratio Report

(dalam juta Rupiah / in million Rupiah)

No	Keterangan	Jumlah Total		Description
		Bank	Konsolidasi Consolidated	
1	Total Aset di Neraca pada Laporan Keuangan Publikasi (Nilai Gross Sebelum Dikurangi CKPN)	24,324,039	25,662,140	Total Assets in the Statement of Financial Position in Publication of Financial Statements (Gross Value Before Less CKPN)
2	Penyesuaian untuk Nilai Penyertaan pada Bank, Lembaga Keuangan, Perusahaan Asuransi, dan/atau Entitas Lain yang Berdasarkan Standar Akuntansi Keuangan harus Dikonsolidasikan Namun Di Luar Cakupan Konsolidasi Berdasarkan Ketentuan Otoritas Jasa Keuangan	-	-	Adjustments for Participation Value in Banks, Financial Institutions, Insurance Companies, and/or Other Entities Based on Financial Accounting Standards must be Consolidated but Outside the Scope of Consolidation based on the Provisions of the Financial Services Authority
3	Penyesuaian untuk Nilai Kumpulan Aset Keuangan atau Aset Syariah yang Mendasari (Underlying) yang Telah Dialihkan dalam Sekuritisasi Aset yang Memenuhi Persyaratan Jual Putus Sebagaimana Diatur dalam Peraturan Perundang-Undangan Otoritas Jasa Keuangan Mengenal Prinsip Kehati-Hatian dalam Aktivitas Sekuritisasi Aset bagi Bank Umum	-	-	Adjustments for the Value of Underlying Pool of Financial Assets that have been Transferred in Asset Securitization that Meet the Sellout Requirements as Stipulated in the Financial Services Authority Regulation on the Prudential Principle in Asset Securitization Activities for Commercial Banks
4	Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi ketentuan Giro Wajib Minimum (Jika Ada)	N/A	N/A	Adjustments to the Temporary Exemption from Placement of Current Accounts with Bank Indonesia in order to Comply with the Minimum Statutory Reserve Requirement (If Any)
5	Penyesuaian untuk Aset Fidusia yang Diakui sebagai Komponen Neraca Berdasarkan Standar Akuntansi Keuangan Namun Dikeluarkan dari Perhitungan Total Eksposur dalam Rasio Leverage	N/A	N/A	Adjustments for Fiduciary Assets that are Recognized as a Component of the Statement of Financial Position Based on Financial Accounting Standards but are Excluded from the Calculation of Total Exposure in the Leverage Ratio
6	Penyesuaian untuk Nilai Pembelian atau Penjualan Aset Keuangan secara Regular dengan Menggunakan Metode Akuntansi Tanggal Perdagangan	-	-	Adjustments for the Value of Regular Purchase or Sale of Financial Assets by Using the Trade Date Accounting Method
7	Penyesuaian untuk Nilai Transaksi dalam Fasilitas Cash Pooling yang Memenuhi Persyaratan Sebagaimana Diatur dalam Peraturan Otoritas Jasa Keuangan Ini	-	-	Adjustments for Cash Pooling Transaction Value that Meet the Requirements Stipulated in this Financial Services Authority Regulations
8	Penyesuaian untuk Nilai Eksposur Transaksi Derivatif	92,238	92,238	Adjustments for Derivative Transaction Exposure Values
9	Penyesuaian untuk Nilai Eksposur Securities Financing Transaction (SFT) Sebagai Contoh Transaksi Reverse Repo	-	-	Adjustments for SFT Exposure Values, for Example Reverse Repo Transactions
10	Penyesuaian untuk Nilai Eksposur Transaksi Rekening Administratif (TRA) yang telah Dikalikan dengan Faktor Konversi Kredit (FKK)	1,213,831	621,377	Adjustments for TRA Exposure Value that has been Multiplied by FKK
11	Prudent Valuation Adjustments Berupa Faktor Pengurang Modal dan Cadangan Kerugian Penurunan Nilai (CKPN)	(1,353,664)	(1,020,560)	Adjustment of Prudential Assessment in the form of Capital Deduction Factors and CKPN
12	Penyesuaian Lainnya (Jika Ada)	-	-	Other Adjustments (If Any)
13	<b>Total Eksposur dalam Perhitungan Rasio Leverage</b>	<b>24,276,444</b>	<b>25,355,175</b>	<b>Total Exposures in Calculating the Leverage Ratio</b>

**Tabel Laporan Perhitungan Rasio Pengungkit**  
Table of Leverage Ratio Calculation Report

(dalam juta Rupiah / in million Rupiah)

No	Keterangan	Individu Individually		Konsolidasi Consolidated		Description
		31 Desember 2021 31 December 2021	30 September 2021 30 September 2021	31 Desember 2021 31 December 2021	30 September 2021 30 September 2021	
<b>Eksposur Aset dalam Laporan Posisi Keuangan (Neraca)</b>						
1	Eksposur Aset dalam Laporan Posisi Keuangan (Neraca) termasuk Aset Jaminan yang Tercatat dalam Neraca, Namun Tidak Termasuk Eksposur Transaksi Derivatif dan Eksposur SFT (Nilai Gross Sebelum Dikurangi CKPN)	23,631,592	23,423,432	24,969,565	24,993,418	Asset Exposure in the Statement of Financial Position Includes Guarantee Assets, but does not Include Derivative Transaction Exposure and SFT Exposure (Gross Value Before Less CKPN)
2	Nilai Penambahan Kembali untuk Agunan Derivatif yang Diserahkan kepada Pihak Lawan dan Penyediaan Agunan tersebut Mengakibatkan Penurunan Total Eksposur Aset dalam Neraca karena Adanya Penerapan Standar Akuntansi	-	-	-	-	The Added Back Value for Derivative Collateral Handed Over to a Counterparty which Results in a Decrease in the Total Exposure of Assets in the Balance Sheet due to the Implementation of Financial Accounting Standards
3	(Pengurangan atas Piutang terkait Cash Variation Margin yang Diberikan dalam Transaksi Derivatif)	-	-	-	-	(Deductions for CVM-Related Receivables Given in Derivative Transactions)
4	(Penyesuaian untuk Surat Berharga yang Diterima dalam Eksposur SFT yang Telah Dicatat sebagai Aset dalam Neraca Bank)	-	-	-	-	(Adjustments for the Carrying Value of Securities Received in SFT Exposure that is Recognized as Asset)
5	(Cadangan Kerugian Penurunan Nilai (CKPN) atas Aset sesuai Standar Akuntansi yang Berlaku)	(664,098)	(651,547)	(714,869)	(698,524)	(CKPN on These Assets is in accordance with the Financial Accounting Standards)
6	(Aset yang Telah Diperhitungkan Sebagai Faktor Pengurang Modal Inti (Tier 1) sebagaimana dimaksud dalam Peraturan Otoritas Jasa Keuangan yang Mengatur Mengenai Kewajiban Penyediaan Modal Minimum Bank Umum)	(689,566)	(672,911)	(305,584)	(270,788)	(Assets that have been Calculated as Deduction Factors for Core Capital as referred to in the Financial Services Authority Regulation on the Capital Adequacy Ratio for Commercial Banks)
7	<b>Total Eksposur Aset dalam Laporan Posisi Keuangan (Neraca)</b> (Penjumlahan dari Baris 1 sampai dengan Baris 6)	<b>22,277,928</b>	<b>22,098,974</b>	<b>23,949,112</b>	<b>24,024,106</b>	<b>Total Asset Exposures in the Statement of Financial Position</b> (Sum of Line 1 to line 6)

No	Keterangan	Individu Individually		Konsolidasi Consolidated		Description
		31 Desember 2021 31 December 2021	30 September 2021 30 September 2021	31 Desember 2021 31 December 2021	30 September 2021 30 September 2021	
<b>Exposure of Derivative Transactions</b>						
8	Nilai Replacement Cost (RC) untuk Seluruh Transaksi Derivatif Baik dalam Hal Terdapat Variation Margin yang Memenuhi Syarat ataupun Terdapat Perjanjian Saling Hapus yang Memenuhi Persyaratan Tertentu	728	7	728	18	RC Value for All Derivative Transactions, whether There is a Variation Margin That Meets the Requirements or there is an Offsetting Agreement that Meets Certain Requirements
9	Nilai Penambahan yang Merupakan Potential Futures Exposures (PFE) untuk Seluruh Transaksi Derivatif	93,242		93,242	215	Added Value which is the PFE for all Derivative Transactions
10	(Pengecualian atas Eksposur Transaksi Derivatif yang Diselesaikan melalui Central Clearing Counterparty (CCP))	N/A	N/A	N/A	N/A	(Exceptions of Derivative Transaction Exposure Settled through Central Counterparty (CCP))
11	Penyesuaian untuk Nilai Nominasi Efektif dari Derivatif Kredit					Adjustments for Effective Notional Value of Credit Derivatives
12	(Penyesuaian untuk Nilai Nominasi Efektif yang Dilakukan Saling Hapus dan Pengurangan Add-On untuk Transaksi Penjualan Kredit Derivatif)	-	-	-	-	(Adjustments for Effective Notional Value made for Offsetting and Add-on Deductions for Credit Derivative Sales Transactions)
13	<b>Total Eksposur Transaksi Derivatif (Penjumlahan Baris 8 sampai dengan Baris 12)</b>	<b>93,970</b>	<b>7</b>	<b>93,970</b>	<b>233</b>	<b>Total Exposures of Derivative Transaction (Sum of Line 8 to Line 12)</b>
<b>Eksposur Securities Financing Transaction (SFT)</b>						
14	Nilai Gross SFT	690,715	136,889	690,715	136,889	Carrying Value of SFT Assets in Gross
15	(Nilai Bersih antara Liabilitas Kas dan Tagihan Kas)					(Net Value between Cash Liabilities and Cash Receivables)
16	Risiko Kredit akibat Kegagalan Pihak Lawan terkait Aset SFT yang Mengacu Perhitungan Current Exposure sebagaimana diatur dalam Lampiran I Peraturan Otoritas Jasa Keuangan	-	-	-	-	Credit Risk due to Counterparty Failure Related to SFT Assets which refers to the Calculation of Current Exposure as Stipulated in the Attachment to this Financial Services Authority Regulation
17	Eksposur sebagai Agen SFT					Exposure as an SFT Agent
18	<b>Total Eksposur SFT (Penjumlahan Baris 14 sampai dengan Baris 17)</b>	<b>690,715</b>	<b>136,889</b>	<b>690,715</b>	<b>136,889</b>	<b>Total SFT Exposures (Sum of Line 14 to Line 17)</b>

No	Keterangan	Individu Individually		Konsolidasi Consolidated		Description
		31 Desember 2021 31 December 2021	30 September 2021 30 September 2021	31 Desember 2021 31 December 2021	30 September 2021 30 September 2021	
<b>Eksposur Transaksi Rekening Administratif (TRA)</b>						
19	Nilai Seluruh Kewajiban Komitmen atau Kewajiban Kontijensi *Nilai Gross Sebelum Dikurangi CKPN	3,503,343	2,698,688	2,392,314	2,503,917	Exposure of Administrative Account Transaction (TRA) Value of All Commitments Liabilities or Contingent Liabilities *(Gross Value Before Less CKPN)
20	(Penyesuaian Terhadap Hasil Perkalian antara Nilai Kewajiban Komitmen atau Kewajiban Kontijensi dan Faktor Konversi Kredit (FKK))	(2,289,511)	(1,748,508)	(1,770,936)	(1,836,721)	(Adjustment to the Multiplication Result of Commitment Liabilities or Contingent Liabilities Value and FKK, then Deducted by CKPN)
21	(Cadangan Kerugian Penurunan Nilai (CKPN) atas TRA tersebut Sesuai Standar Akuntansi yang Berlaku)	-	-	-	-	(CKPN on TRA is According to the Financial Accounting Standards)
22	<b>Total Eksposur Transaksi Rekening Administratif (TRA) (Penjumlahan dari Baris 19 sampai dengan Baris 21)</b>	<b>1,213,832</b>	<b>950,180</b>	<b>621,378</b>	<b>667,196</b>	<b>Total Administrative Account Transactions Exposures (Sum of line 19 to line 21)</b>
<b>Modal dan Total Eksposur</b>						
23	Modal Inti (Tier 1)	2,078,799	1,777,595	2,339,107	2,008,322	Capital and Total Exposures Core Capital (Tier 1)
24	<b>Total Eksposur (Penjumlahan Baris 7, 13, 18, dan 22)</b>	<b>24,276,445</b>	<b>23,186,050</b>	<b>25,355,175</b>	<b>24,828,424</b>	<b>Total Exposures (Sum of Line 7, 13, 18, and 22)</b>
<b>Rasio Leverage</b>						
25	Nilai Rasio Leverage (Kolom 23 ÷ Kolom 24)	8.56%	7.67%	9.23%	8.09%	Leverage Ratio Value (Column 23 ÷ Column 24)
26	<b>Nilai Minimum Rasio Leverage</b>	<b>3%</b>	<b>3%</b>	<b>3%</b>	<b>3%</b>	<b>Minimum Value of Leverage Ratio</b>
27	<b>Buffer terhadap Nilai Rasio Leverage</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>Buffer for Leverage Ratio Value</b>
<b>Pengungkapan Nilai Rata-Rata</b>						
28	Nilai Rata-Rata dari Nilai Tercatat Aset SFT Secara Gross, Setelah Penyesuaian untuk Transaksi Akuntansi Penjualan (Sale Accounting Transaction) yang Dihitung secara Bersih (Nett) dengan Liabilitas Kas dalam SFT dan Tagihan Kas dalam SFT	690,715	136,889	690,715	136,889	Disclosure of Average Value The Average Carrying Value of SFT Assets on a Gross Basis, After Adjustments for Sale Accounting Transactions which are Calculated on a Net Basis with Cash Liabilities in SFT and Cash Receivables in SFT
29	Nilai Akhir Triwulan Laporan dari Nilai Tercatat Aset SFT Secara Gross, Setelah Penyesuaian untuk Transaksi Akuntansi Penjualan (Sale Accounting Transaction) yang Dihitung Secara Bersih (Nett) dengan Liabilitas Kas dalam SFT dan Tagihan Kas dalam SFT	690,715	136,889	690,715	136,889	The End Value of the Quarterly Report on the Carrying Value of SFT Assets on a Gross Basis, After Adjustments for Sale Accounting Transactions which are Calculated on a Net Basis with Cash Liabilities in SFT and Cash Receivables in SFT

No	Keterangan	Individu Individually		Konsolidasi Consolidated		Description
		31 Desember 2021 31 December 2021	30 September 2021 30 September 2021	31 Desember 2021 31 December 2021	30 September 2021 30 September 2021	
30	Total Eksposur, Termasuk Dampak dari Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam rangka Memenuhi Ketentuan Giro Wajib Minimum (Jika Ada), yang telah Memasukkan Nilai Rata-Rata dari Nilai Tercatat Aset SFT secara Gross Sebagaimana Dimaksud dalam Baris 28	24,276,444	22,781,391	24,813,627	24,286,735	Total Exposure, Including the Impact of Adjustments to the Temporary Exemption on Current Account Placements with Bank Indonesia in order to Comply with the Statutory Reserve Requirement (If Any), which Includes the Average Carrying Value of SFT Assets in Gross as Referred to in Line 28
	a. Total Eksposur, Tidak Termasuk Dampak dari Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro Pada Bank Indonesia Dalam Rangka Memenuhi Ketentuan Giro Wajib Minimum (Jika Ada), yang telah Memasukkan Nilai Rata-Rata dari Nilai Tercatat Aset SFT secara Gross Sebagaimana Dimaksud dalam Baris 28	24,351,445	23,186,050	25,355,175	24,828,282	a. Total Exposure, Excluding the Impact of Adjustments to the Temporary Exemption on Current Account Placements with Bank Indonesia in Order to Comply with the Statutory Reserve Requirement (If Any), which Includes the Average Carrying Value of SFT Assets in Gross as Referred to in Line 28
31	Nilai Rasio Pengungkit, Termasuk Dampak dari Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan Giro Wajib Minimum (Jika Ada), yang telah Memasukkan Nilai Rata-Rata dari Nilai Tercatat Aset SFT secara Gross Sebagaimana Dimaksud dalam Baris 28	8.56%	7.80%	9.43%	8.27%	Total Exposure, Including the Impact of Adjustments to the Temporary Exemption on Current Account Placements with Bank Indonesia in order to Comply with the Statutory Reserve Requirement (If Any), which Includes the Average Carrying Value of SFT Assets in Gross as referred to in Line 28
	a. Nilai Rasio Pengungkit, Tidak Termasuk Dampak dari Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan Giro Wajib Minimum (Jika Ada), yang telah Memasukkan Nilai Rata-Rata dari Nilai Tercatat Aset SFT secara Gross Sebagaimana Dimaksud dalam Baris 28	8.54%	7.67%	9.23%	8.09%	a. Leverage Ratio, Excluding the Impact of Adjustments to the Temporary Exemption on Current Account Placements with Bank Indonesia in Order to Comply with the Statutory Reserve Requirement (If Any), which includes the Average Carrying Value of SFT Assets in Gross as referred to in Line 28

#### Analisis Kualitatif / Qualitative Analysis

Secara individu dan konsolidasi, Rasio Pengungkit PT. Bank Victoria International Tbk beserta Entitas Anak pada periode Desember 2021 memiliki rasio sebesar 8,54% dan 9,23% Individually and on a consolidated basis, the leverage ratio of PT Bank Victoria International Tbk and its Subsidiary in the period of December 2021 had a ratio of 8.54% and 9.23%, respectively.

**Tabel Pengungkapan Tagihan Bersih berdasarkan Wilayah – Bank secara Individual**  
**Table of Disclosure of Net Receivables by Area – Bank Individually**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021							31 Desember 2020 / 31 December 2020				Portfolio Category
		Tagihan Bersih berdasarkan Wilayah Net Receivables by Region							Tagihan Bersih berdasarkan Wilayah Net Receivables by Region				
		Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Di Luar Indonesia (Wilayah 4) Indonesia Outside (Zone 4)	Total	Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Di Luar Indonesia (Wilayah 4) Indonesia Outside (Zone 4)	Total		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(2)	
1	Tagihan kepada Pemerintah	4,130,048	-	-	-	4,130,048	4,287,133	-	-	-	4,287,133	Receivables from Government	
2	Tagihan kepada Entitas Sektor Publik	1,288,477	-	-	-	1,288,477	881,734	-	-	-	881,734	Receivables from Public Sector Entities	
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	2,523	-	-	-	2,523	1,761	-	-	-	1,761	Receivables from Multilateral Development Banks and International Institutions	
4	Tagihan kepada Bank	1,307,313	1,760	-	211,690	1,520,763	1,137,429	451,428	-	110,161	1,699,018	Receivables from Banks	
5	Kredit Beragunan Rumah Tinggal	95,711	-	-	-	95,711	72,087	-	-	-	72,087	Residential Property Collateralized Loans	
6	Kredit Beragunan Properti Komersial	1,184,821	32,633	-	-	1,217,454	1,244,029	41,057	-	-	1,285,086	Commercial Property Collateralized Loans	
7	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans	
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portfolio Ritel	75,555	1,941	-	890	78,387	60,075	317	-	914	61,306	Receivables from Microbusiness, Small Business, and Retail Portfolio	
9	Tagihan kepada Korporasi	11,072,205	999,470	-	-	12,071,674	10,716,592	797,731	-	-	11,514,324	Receivables from Corporations	
10	Tagihan yang Telah Jatuh Tempo	467,182	131,859	-	-	599,040	569,525	101,502	-	-	671,027	Due Receivables	
11	Aset Lainnya	1,707,745	-	-	-	1,707,745	2,005,099	-	-	-	2,005,099	Other Assets	
	<b>Total</b>	<b>21,331,579</b>	<b>1,167,663</b>	<b>-</b>	<b>212,581</b>	<b>22,711,823</b>	<b>20,975,464</b>	<b>1,392,036</b>	<b>-</b>	<b>111,075</b>	<b>22,478,575</b>	<b>Total</b>	

## Tabel Pengungkapan Tagihan Bersih berdasarkan Wilayah – Bank secara Konsolidasi dengan Entitas Anak

Table of Disclosure of Net Receivables by Area - Bank Consolidated with Subsidiaries

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021							31 Desember 2020 / 31 December 2020					Portfolio Category
		Tagihan Bersih berdasarkan Wilayah Net Receivables by Region							Tagihan Bersih berdasarkan Wilayah Net Receivables by Region					
		Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Di Luar Indonesia (Wilayah 4) Indonesia Outside (Zone 4)	Total	Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Di Luar Indonesia (Wilayah 4) Indonesia Outside (Zone 4)	Total			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(2)		
1	Tagihan kepada Pemerintah	4,676,135	-	-	-	4,676,135	4,999,392	-	-	-	4,999,392	Receivables from Government		
2	Tagihan kepada Entitas Sektor Publik	1,288,477	-	-	-	1,288,477	881,734	-	-	-	881,734	Receivables from Public Sector Entities		
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	2,523	-	-	-	2,523	1,761	-	-	-	1,761	Receivables from Multilateral Development Banks and International Institutions		
4	Tagihan kepada Bank	1,484,108	1,760	-	211,690	1,697,558	1,410,438	451,428	-	110,161	1,972,027	Receivables from Banks		
5	Kredit Beragunan Rumah Tinggal	236,317	-	-	-	236,317	247,912	-	-	-	247,912	Residential Property Collateralized Loans		
6	Kredit Beragunan Properti Komersial	1,185,321	32,633	-	-	1,217,954	1,244,865	41,057	-	-	1,285,922	Commercial Property Collateralized Loans		
7	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans		
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portfolio Ritel	76,327	1,941	-	890	79,159	61,828	317	-	914	63,059	Receivables from Microbusiness, Small Business, and Retail Portfolio		
9	Tagihan kepada Korporasi	11,570,826	999,470	-	-	12,570,296	11,616,026	797,731	-	-	12,413,758	Receivables from Corporations		
10	Tagihan yang Telah Jatuh Tempo	623,347	131,859	-	-	755,205	688,735	101,502	-	-	790,237	Due Receivables		
11	Aset Lainnya	1,848,154	-	-	-	1,848,154	2,126,602	-	-	-	2,126,602	Other Assets		
	<b>Total</b>	<b>22,991,535</b>	<b>1,167,663</b>	<b>-</b>	<b>212,581</b>	<b>24,371,779</b>	<b>23,279,294</b>	<b>1,392,036</b>	<b>-</b>	<b>111,075</b>	<b>24,782,404</b>	<b>Total</b>		



(dalam juta Rupiah / in million Rupiah)

**Tabel Pengungkapan Tagihan Bersih berdasarkan Sisa Jangka Waktu Kontrak - Bank secara Individual**  
**Table of Disclosure of Net Receivables by Remaining Contract Period – Bank Individually**

No.	Kategori Portofolio	31 Desember 2021 / 31 December 2021						31 Desember 2020 / 31 December 2020						Portfolio Category
		Tagihan Bersih berdasarkan Sisa Jangka Waktu Kontrak Net Receivables by Remaining Contract Period						Tagihan Bersih berdasarkan Sisa Jangka Waktu Kontrak Net Receivables by Remaining Contract Period						
		<1 tahun <1 year	>1 tahun s.d. 3 tahun >1 to 3 years	>3 tahun s.d. 5 tahun >3 to 5 years	>5 tahun >5 years	Non- Kontraktual Non- Contractual	Total	<1 tahun <1 year	>1 tahun s.d. 3 tahun >1 to 3 years	>3 tahun s.d. 5 tahun >3 to 5 years	>5 tahun >5 years	Non- Kontraktual Non- Contractual	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(2)
1	Tagihan kepada Pemerintah	1,471,404	143,775	369,221	2,145,648	-	4,130,048	1,431,323	82,125	771,948	2,001,737	-	4,287,133	Receivables from Government
2	Tagihan kepada Entitas Sektor Publik	992,698	32,600	27,768	235,411	-	1,288,477	844,955	36,779	-	-	-	881,734	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	2,523	-	-	-	2,523	-	1,761	-	-	-	1,761	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	1,500,972	19,792	-	-	-	1,520,763	1,375,308	323,710	-	-	-	1,699,018	Receivables from Banks
5	Kredit Beragunan Rumah Tinggal	9,208	14,464	18,889	53,150	-	95,711	1,087	12,400	14,368	44,231	-	72,087	Residential Property Collateralized Loans
6	Kredit Beragunan Properti Komersial	314,486	55,583	149,177	698,208	-	1,217,454	265,912	106,181	132,988	780,006	-	1,285,086	Commercial Property Collateralized Loans
7	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	63,208	8,082	5,562	1,536	-	78,387	50,632	7,210	2,057	1,407	-	61,306	Receivables from Microbusiness, Small Business, and Retail Portfolio
9	Tagihan kepada Korporasi	6,912,394	1,316,429	2,303,298	1,535,953	3,601	12,071,674	6,223,181	1,396,034	1,892,934	2,002,175	-	11,514,324	Receivables from Corporations
10	Tagihan yang Telah Jatuh Tempo	227,993	74,468	224,098	72,482	-	599,040	296,480	40,277	52,982	281,289	-	671,027	Due Receivables
11	Aset Lainnya	-	-	-	-	1,707,745	1,707,745	-	-	-	-	2,005,099	2,005,099	Other Assets
	<b>Total</b>	<b>11,492,362</b>	<b>1,667,714</b>	<b>3,098,013</b>	<b>4,742,387</b>	<b>1,711,347</b>	<b>22,711,823</b>	<b>10,488,879</b>	<b>2,006,477</b>	<b>2,867,276</b>	<b>5,110,844</b>	<b>2,005,099</b>	<b>22,478,575</b>	<b>Total</b>

## Tabel Pengungkapan Tagihan Bersih berdasarkan Sisa Jangka Waktu Kontrak - Bank secara Konsolidasi dengan Entitas Anak

Table of Disclosure of Net Receivables by Remaining Contract Period – Bank Consolidated with Subsidiaries

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2021 / 31 December 2021							31 Desember 2020 / 31 December 2020							Portfolio Category
		Tagihan Bersih berdasarkan Sisa Jangka Waktu Kontrak Net Receivables by Remaining Contract Period							Tagihan Bersih berdasarkan Sisa Jangka Waktu Kontrak Net Receivables by Remaining Contract Period							
		<1 tahun <1 year	>1 tahun s.d. 3 tahun >1 to 3 years	>3 tahun s.d. 5 tahun >3 to 5 years	>5 tahun >5 years	Non- Kontraktual Non- Contractual	Total	<1 tahun <1 year	>1 tahun s.d. 3 tahun >1 to 3 years	>3 tahun s.d. 5 tahun >3 to 5 years	>5 tahun >5 years	Non- Kontraktual Non- Contractual	Total			
(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(2)				
1	Tagihan kepada Pemerintah	1,494,395	228,414	468,972	2,484,354	-	4,676,135	1,526,515	92,332	771,948	2,608,597	-	4,999,392	Receivables from Government		
2	Tagihan kepada Entitas Sektor Publik	992,698	32,600	27,768	235,411	-	1,288,477	844,955	36,779	-	-	-	881,734	Receivables from Public Sector Entities		
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	2,523	-	-	-	2,523	-	1,761	-	-	-	1,761	Receivables from Multilateral Development Banks and International Institutions		
4	Tagihan kepada Bank	1,677,767	19,792	-	-	-	1,697,558	1,648,317	323,710	-	-	-	1,972,027	Receivables from Banks		
5	Kredit Beragunan Rumah Tinggal	20,041	66,703	51,307	98,266	-	236,317	73,311	36,231	41,999	96,371	-	247,912	Residential Property Collateralized Loans		
6	Kredit Beragunan Properti Komersial	314,986	55,583	149,177	698,208	-	1,217,954	266,747	106,181	132,988	780,006	-	1,285,922	Commercial Property Collateralized Loans		
7	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans		
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	63,542	8,381	5,700	1,536	-	79,159	51,188	7,918	2,546	1,407	-	63,059	Receivables from Microbusiness, Small Business, and Retail Portfolio		
9	Tagihan kepada Korporasi	7,201,152	1,421,862	2,375,146	1,568,535	3,601	12,570,296	6,784,265	1,518,396	2,053,026	2,039,989	18,081	12,413,758	Receivables from Corporations		
10	Tagihan yang Telah Jatuh Tempo	379,699	78,926	224,098	72,482	-	755,205	412,841	43,126	52,982	281,289	-	790,237	Due Receivables		
11	Aset Lainnya	-	-	-	-	1,848,154	1,848,154	121,503	-	-	-	2,005,099	2,126,602	Other Assets		
	<b>Total</b>	<b>12,144,280</b>	<b>1,914,783</b>	<b>3,302,169</b>	<b>5,158,792</b>	<b>1,851,755</b>	<b>24,371,779</b>	<b>11,729,643</b>	<b>2,166,434</b>	<b>3,055,489</b>	<b>5,807,658</b>	<b>2,023,180</b>	<b>24,782,404</b>	<b>Total</b>		

Tabel Pengungkapan Tagihan Bersih berdasarkan Sektor Ekonomi – Bank secara Individual  
Table of Disclosure of Net Receivables by Economic Sector – Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	31 Desember 2021 / 31 December 2021											(2)
		(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	
		Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Kredit Beragun Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragun Properti Komersial Commercial Property Collateralized Loans	Kredit Pegawai/Pensiun Employee/Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets	Economic Sector
1	Pertanian, Kehutanan, dan Perikanan	-	235,411	-	-	-	-	-	220	260,194	-	-	Agriculture, Forestry, and Fisheries
2	Pertambangan dan Penggalian	-	-	-	-	-	-	-	276	45,428	5	-	Mining and Extractive Industries
3	Industri Pengolahan	-	-	-	-	-	-	-	8,922	1,608,271	35,930	-	Processing Industry
4	Pengadaan Listrik, Gas, Uap/Air Panas, dan Udara Dingin	-	-	-	-	-	-	-	-	228,117	-	-	Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air
5	Pengelolaan Air, Pengelolaan Limbah, Pengelolaan dan Daur Ulang Sampah	-	-	-	-	-	-	-	-	24,840	-	-	Water Management, Waste Water Management, Waste Management and Recycle
6	Konstruksi	-	-	-	-	-	226,279	-	3,900	771,940	76,935	-	Construction
7	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor	-	-	-	-	-	-	-	34,556	1,918,652	40,525	-	Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance
8	Pengangkutan dan Perhubungan	-	-	-	-	-	-	-	161	356,283	4,444	-	Transportation and Warehousing
9	Penyediaan Akomodasi dan Penyediaan Makanan Minum	-	-	-	-	-	-	-	5,711	1,299,557	155,845	-	Provision of Accommodation And Foods & Beverages
10	Informasi dan Komunikasi	-	-	-	-	-	-	-	1,621	173,613	-	-	Information and Communication
11	Aktivitas Keuangan dan Asuransi	1,471,404	1,025,298	2,523	1,520,763	-	-	-	858	2,587,834	-	-	Financial and Insurance Activities
12	Real Estate	-	27,768	-	-	-	980,132	-	4,800	1,267,768	202,838	-	Real Estate
13	Aktivitas Profesi, Ilmiah, dan Teknis	-	-	-	-	-	11,042	-	9,308	648,353	5,614	-	Professional, Scientific, and Technical Activities
14	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya	-	-	-	-	-	-	-	1,960	307,178	32,155	-	Leasing and Leasing Activities without Option Rights; Employment, Travel Agencies, and Other Business Supports
15	Administrasi Pemerintahan, Perumahan, dan Jaminan Sosial Wajib	2,658,644	-	-	-	-	-	-	-	-	-	-	Government administration, land business and mandatory social service
16	Pendidikan	-	-	-	-	-	-	-	1,856	168,781	4,692	-	Education
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	-	-	-	-	-	-	-	992	6,412	-	-	Human Health Activities and Social Activities

31 Desember 2021 / 31 December 2021													
No.	Sektor Ekonomi	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	Ekonomi Sector
		Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Kredit Beragun Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragun Properti Komersial Commercial Property Collateralized Loans	Kredit Pegawai/Pensiun Employee/Retirement Loans	Tagihan kepada Usaha Mikro, Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(2)
18	Kesenian, Hiburan, dan Rekreasi	-	-	-	-	-	-	-	-	148,113	-	-	Arts, Entertainment, and Recreation
19	Aktivitas Jasa Lainnya	-	-	-	-	-	-	-	3,246	173,974	16,865	-	Other Services Activities
20	Aktivitas Rumah Tangga sebagai Pemberi Kerja	-	-	-	-	-	-	-	-	-	-	-	Household Activities as Employer
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	-	-	-	-	-	-	-	-	-	-	-	International Organizations and Other Extra International Organizations Activities
22	Bukan Lapangan Usaha	-	-	-	-	95,711	-	-	-	76,366	23,193	-	Non-Business
23	Lainnya	-	-	-	-	-	-	-	-	-	-	-	Others
	<b>Total</b>	4,130,048	1,288,477	2,523	1,520,763	95,711	1,217,454	-	78,387	12,071,674	599,040	1,707,745	<b>Total</b>

(dalam juta Rupiah / in million Rupiah)

31 Desember 2020 / 31 December 2020													
No.	Sektor Ekonomi	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	Ekonomi Sector
		Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Kredit Beragun Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragun Properti Komersial Commercial Property Collateralized Loans	Kredit Pegawai/Pensiun Employee/Retirement Loans	Tagihan kepada Usaha Mikro, Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(2)
1	Pertanian, Kehutanan, dan Perikanan	-	251,508	-	-	-	-	-	129	97,405	2,070	-	Agriculture, Forestry, and Fisheries
2	Pertambangan dan Pengalihan	-	46,969	-	-	-	-	-	1,000	54,679	37,394	-	Mining and Extractive Industries
3	Industri Pengolahan	-	-	-	-	-	-	-	7,323	1,480,114	40,633	-	Processing Industry
4	Pengadaan Listrik, Gas, Uap/Air Panas, dan Udara Dingin	-	-	-	-	-	-	-	-	246,934	-	-	Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air

		31 Desember 2020 / 31 December 2020														
No.	Sektor Ekonomi	Economic Sector										Total				
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)		(11)	(12)	(13)	(2)
		Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Kredit Beragun Rumah Tinggal Property Collateralized Loans	Kredit Beragun Properti Komersial Commercial Property Collateralized Loans	Kredit Pegawai/Perisn Employees/Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets				
5	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah	-	-	-	-	-	-	-	-	-	-	-	28,222	-	-	Water Management, Waste Management, Waste Management and Recycle
6	Konstruksi	-	-	-	-	-	251,179	-	4,625	370,445	70,073	-	-	-	-	Construction
7	Perdagangan Besar dan Eceran; Reparsi dan Perawatan Mobil dan Sepeda Motor	-	-	-	-	-	-	-	26,422	1,448,306	46,587	-	-	-	-	Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance
8	Pengangkutan dan Pergudangan	-	-	-	-	-	-	-	2,137	374,869	4,752	-	-	-	-	Transportation and Warehousing
9	Penyediaan Akomodasi dan Penyediaan Makanan Minum	-	-	-	-	-	-	-	4,289	1,492,661	74,163	-	-	-	-	Provision of Accommodation And Foods & Beverages
10	Informasi dan Komunikasi	-	-	-	-	-	-	-	1,668	1,498	-	-	-	-	-	Information and Communication
11	Aktivitas Keuangan dan Asuransi	1,740,109	583,258	1,761	1,699,018	-	-	-	551	2,337,243	-	-	-	-	-	Financial and Insurance Activities
12	Real Estate	-	-	-	-	-	1,024,097	-	1,025	1,845,024	343,251	-	-	-	-	Real Estate
13	Aktivitas Profesi, Ilmiah, dan Teknis	-	-	-	-	-	9,811	-	3,811	821,164	13,559	-	-	-	-	Professional, Scientific, and Technical Activities
14	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Kerenagakejaan, Agen Perjalanan, dan Penunjang Usaha Lainnya	-	-	-	-	-	-	-	2,895	123,425	3,437	-	-	-	-	Leasing and Leasing Activities without Option Rights; Employment, Travel Agencies, and Other Business Supports
15	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib	2,547,024	-	-	-	-	-	-	-	-	-	-	-	-	-	Government administration, land business and mandatory social service
16	Pendidikan	-	-	-	-	-	-	-	204	166,969	4,478	-	-	-	-	Education
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	-	-	-	-	-	-	-	2,400	181,165	1,340	-	-	-	-	Human Health Activities and Social Activities
18	Kesenian, Hiburan, dan Rekreasi	-	-	-	-	-	-	-	166	122,812	-	-	-	-	-	Arts, Entertainment, and Recreation
19	Aktivitas Jasa Lainnya	-	-	-	-	-	-	-	2,661	193,554	946	-	-	-	-	Other Services Activities
20	Aktivitas Rumah Tangga sebagai Pemberi Kerja	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Household Activities as Employer
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	-	-	-	-	-	-	-	-	-	-	-	-	-	-	International Organizations and Other Extra International Organizations Activities
22	Bukan Lapangan Usaha	-	-	-	-	72,087	-	-	-	123,834	28,344	-	-	-	-	Non-Business
23	Lainnya	-	-	-	-	-	-	-	-	-	-	-	-	-	2,005,099	Others
	<b>Total</b>	<b>4,287,133</b>	<b>881,734</b>	<b>1,761</b>	<b>1,699,018</b>	<b>72,087</b>	<b>1,285,086</b>	<b>-</b>	<b>61,306</b>	<b>11,514,324</b>	<b>671,027</b>	<b>-</b>	<b>2,005,099</b>	<b>2,005,099</b>	<b>2,005,099</b>	<b>Total</b>

**Tabel Pengungkapan Tagihan Bersih berdasarkan Sektor Ekonomi – Bank secara Konsolidasi dengan Entitas Anak**  
**Table of Disclosure of Net Receivables by Economic Sector – Bank Consolidated with Subsidiaries**

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	31 Desember 2021 / 31 December 2021										(2)	
		(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)		(13)
		Tagihan kepada Pemerintah	Tagihan kepada Entitas Sektor Publik	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	Tagihan kepada Bank	Kredit Beragun Rumah Tinggal	Kredit Beragun Properti Komersial	Kredit Pegawai/ Pensiun	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	Tagihan kepada Korporasi	Tagihan yang Telah Jatuh Tempo	Aset Lainnya	Ekonomi Sector
		Receivables from Government	Receivables from Public Sector Entities	Receivables from Multilateral Banks and International Institutions	Receivables from Banks	Residential Property Collateralized Loans	Commercial Property Collateralized Loans	Employee/ Retirement Loans	Receivables from Microbusiness, Small Business, and Retail Portfolio	Receivables from Corporations	Due Receivables	Other Assets	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(2)
1	Peranian, Kehutanan, dan Perikanan	-	235,411	-	-	-	-	-	220	260,194	-	-	Agriculture, Forestry, and Fisheries
2	Pertambangan dan Pengalangan	-	-	-	-	-	-	-	276	81,420	5	-	Mining and Extractive Industries
3	Industri Pengolahan	-	-	-	-	9,637	-	-	8,922	1,687,572	36,344	-	Processing industry
4	Pengadaan Listrik, Gas, Uap/ Air Panas, dan Udara Dingin	-	-	-	-	-	-	-	-	228,117	-	-	Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air
5	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah	-	-	-	-	-	-	-	-	44,535	-	-	Water Management, Waste Management and Recycle
6	Konstruksi	-	-	-	-	20,420	226,279	-	3,900	771,940	77,548	-	Construction
7	Perdagangan Besar dan Eceran, Perawatan dan Perawatan Mobil dan Sepeda Motor	-	-	-	-	15,570	-	-	34,661	1,919,374	87,409	-	Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance
8	Pengangkutan dan Perhubungan	-	-	-	-	-	-	-	161	364,649	8,444	-	Transportation and Warehousing
9	Penyediaan Akomodasi dan Penyediaan Makanan Minum	-	-	-	-	29,056	-	-	5,711	1,314,806	158,534	-	Provision of Accommodation and Foods & Beverages
10	Informasi dan Komunikasi	-	-	-	-	-	-	-	1,621	173,613	-	-	Information and Communication
11	Aktivitas Keuangan dan Asuransi	1,484,107	1,025,298	2,523	1,697,558	-	-	-	858	2,615,579	-	-	Financial and Insurance Activities
12	Real Estate	-	27,768	-	-	30,382	980,132	-	4,800	1,366,694	202,838	-	Real Estate
13	Aktivitas Profesi, Ilmiah, dan Teknis	-	-	-	-	2,675	11,542	-	9,462	806,253	105,614	-	Professional, Scientific, and Technical Activities
14	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Kelembagaan, Agen Perjalanan, dan Penunjang Usaha Lainnya	-	-	-	-	5,000	-	-	1,960	345,356	32,613	-	Leasing and Leasing Activities without Option Rights, Employment, Travel Agencies, and Other Business Supports
15	Administrasi Pemerintahan, Perumahan, dan Jaminan Sosial Wajib	3,192,028	-	-	-	-	-	-	-	-	-	-	Government Administration, Land Business and Mandatory Social Service
16	Pendidikan	-	-	-	-	-	-	-	1,856	168,781	4,692	-	Education
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	-	-	-	-	-	-	-	992	6,412	-	-	Human Health Activities and Social Activities

31 Desember 2021 / 31 December 2021													
No.	Sektor Ekonomi	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Kredit Beruang Rumah Tinggal Residential Property Collateralized Loans	Kredit Beruang Properti Komersial Commercial Property Collateralized Loans	Kredit Pegawai/Pensiun Employee/Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets	Ekonomi Sector
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(2)
18	Kesenian, Hiburan, dan Rekreasi	-	-	-	-	-	-	-	-	159,143	-	-	Arts, Entertainment, and Recreation
19	Aktivitas Jasa Lainnya	-	-	-	-	1,007	-	-	3,246	173,974	16,865	-	Other Services Activities
20	Aktivitas Rumah Tangga sebagai Pemberi Kerja	-	-	-	-	-	-	-	-	-	-	-	Household Activities as Employer
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	-	-	-	-	-	-	-	-	-	-	-	International Organizations and Other Extra International Organizations Activities
22	Bukan Lapangan Usaha	-	-	-	-	122,571	-	-	513	81,884	24,300	-	Non-Business
23	Lainnya	4,676,135	1,288,477	2,523	1,697,558	236,317	1,217,954	-	79,159	12,570,296	755,205	1,848,154	Others
	<b>Total</b>												<b>Total</b>

(dalam juta Rupiah / in million Rupiah)

31 Desember 2020 / 31 December 2020													
No.	Sektor Ekonomi	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Kredit Beruang Rumah Tinggal Residential Property Collateralized Loans	Kredit Beruang Properti Komersial Commercial Property Collateralized Loans	Kredit Pegawai/Pensiun Employee/Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets	Ekonomi Sector
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(2)
1	Pertanian, Kehutanan, dan Perikanan	-	-	-	-	-	-	-	275	360,570	7,148	-	Agriculture, Forestry, and Fisheries
2	Pertambangan dan Penggalian	552,714	43,645	-	-	-	-	-	1,004	119,872	51,699	-	Mining and Extractive Industries
3	Industri Pengolahan	-	-	-	-	10,096	-	-	12,760	1,985,798	59,394	-	Processing industry
4	Pengadaan Listrik, Gas, Uap/ Air Panas, dan Udara Dingin	-	-	-	-	-	-	-	-	265,051	-	-	Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air



31 Desember 2020 / 31 December 2020													
No.	Sektor Ekonomi	(1) Tagihan kepada Pemerintah Receivables from Government	(2) Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	(3) Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	(4) Tagihan kepada Bank Receivables from Banks	(5) Kredit Beruang Rumah Tinggal Residential Property Collateralized Loans	(6) Kredit Beruang Properti Komersial Commercial Property Collateralized Loans	(7) Kredit Pegawai/Pensiun Employee/Retirement Loans	(8) Tagihan kepada Usaha Mikro, Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	(9) Tagihan kepada Korporasi Receivables from Corporations	(10) Tagihan yang telah Jatuh Tempo Due Receivables	(11) Ases Lainnya Other Assets	(12) Economic Sector
5	Pengelolaan Air, Pengelolaan Daur Ulang Sampah	-	-	-	-	24,820	251,577	-	3,583	731,905	77,711	-	Water Management, Waste Management and Recycle
6	Konstruksi	-	-	-	-	46,071	-	-	26,216	1,707,787	158,487	-	Construction
7	Perdagangan Besar dan Eceran, Reparasi dan Perawatan Mobil dan Sepeda Motor	-	-	-	-	-	-	-	-	-	-	-	Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance
8	Pengangkutan dan Pergudangan	-	-	-	-	-	-	-	2,137	404,424	4,752	-	Transportation and Warehousing
9	Penyediaan Akomodasi dan Penyediaan Makan Minum	-	-	-	-	33,721	-	-	2,834	1,945,623	73,312	-	Provision of Accommodation and Foods & Beverages
10	Informasi dan Komunikasi	-	-	-	-	-	-	-	1,668	1,498	-	-	Information and Communication
11	Aktivitas Keuangan dan Asuransi	3,628,984	71,777	-	2,073,863	-	-	-	751	4,625,277	6,657	-	Financial and Insurance Activities
12	Real Estate	2,023,070	-	-	1,247	39,557	1,269,379	-	10,242	3,502,262	223,860	-	Real Estate
13	Aktivitas Profesi, Ilmiah, dan Teknis	-	-	-	-	-	-	-	-	-	-	-	Professional, Scientific, and Technical Activities
14	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketengakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya	-	-	-	-	-	-	-	416	140,148	5,324	-	Leasing and Leasing Activities without Option Rights, Employment, Travel Agencies, and Other Business Supports
15	Administrasi Pemerintahan, Perumahan, dan Jaminan Sosial Wajib	-	-	-	-	-	-	-	-	-	-	-	Government Administration, Land Business and Mandatory Social Service
16	Pendidikan	-	-	-	-	-	-	-	1,579	7,243	1,528	-	Education
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	-	-	-	-	-	-	-	4,994	452,953	-	-	Human Health Activities and Social Activities
18	Kesenian, Hiburan, dan Rekreasi	-	-	-	-	1,055	-	-	-	-	-	-	Arts, Entertainment, and Recreation
19	Aktivitas Jasa Lainnya	-	-	-	-	-	-	-	-	-	-	-	Other Services Activities
20	Aktivitas Rumah Tangga sebagai Pemberi Kerja	-	-	-	-	-	-	-	-	-	-	-	Household Activities as Employer
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	-	-	-	-	-	-	-	-	-	-	-	International Organizations and Other Extra International Organizations Activities
22	Bukan Lapangan Usaha	-	-	-	-	47,358	-	142	6,918	167,906	42,283	-	Non-Business
23	Lainnya	-	-	-	-	24,207	-	-	-	64,008	4,577	1,922,113	Others
	<b>Total</b>	<b>6,204,769</b>	<b>115,422</b>	<b>-</b>	<b>2,075,110</b>	<b>226,586</b>	<b>1,520,956</b>	<b>142</b>	<b>77,949</b>	<b>16,486,324</b>	<b>722,363</b>	<b>1,922,113</b>	<b>Total</b>

**Tabel Pengungkapan Tagihan dan Pencadangan berdasarkan Wilayah – Bank secara Individual**  
**Table of Disclosure of Receivables and Allowances by Area – Bank Individually**

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2021 / 31 December 2021				Total	Description
		Zona Indonesia Barat (Wilayah 1) (Zone 1)	Zona Indonesia Tengah (Wilayah 2) (Zone 2)	Zona Indonesia Timur (Wilayah 3) (Zone 3)	Diluar Indonesia (Wilayah 4) Indonesia Outside (Zone 4)		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(2)
1	Tagihan	20,455,203	1,282,111	-	212,577	21,949,890	Receivables
2	Tagihan yang Mengalami Peningkatan dan Pemburukan Risiko Kredit (Stage 2 dan Stage 3)						Claims with Increased and Worsening Credit Risk (Stage 2 and Stage 3)
	a. Belum Jatuh Tempo	1,056,684	494,531	-	-	1,551,215	a. Not Due
	b. Telah Jatuh Tempo	835,923	231,220	-	-	1,067,144	b. Due
3	CKPN - Stage 1	100,006	5,075	-	3	105,085	CKPN - Stage 1
4	CKPN - Stage 2	56,648	23,152	-	-	79,800	CKPN - Stage 2
5	CKPN - Stage 3	378,405	99,362	-	-	477,767	CKPN - Stage 3
6	Tagihan yang Dihapus Buku	(419,271)	(6,492)	-	-	(425,763)	Receivables Written Off

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2020 / 31 December 2020				Total	Description
		Zona Indonesia Barat (Wilayah 1) (Zone 1)	Zona Indonesia Tengah (Wilayah 2) (Zone 2)	Zona Indonesia Timur (Wilayah 3) (Zone 3)	Diluar Indonesia (Wilayah 4) Indonesia Outside (Zone 4)		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(2)
1	Tagihan	20,380,247	1,527,803	-	111,074	22,019,124	Receivables
2	Tagihan yang Mengalami Peningkatan dan Pemburukan Risiko Kredit (Stage 2 dan Stage 3)						Claims with Increased and Worsening Credit Risk (Stage 2 and Stage 3)
	a. Belum Jatuh Tempo	2,206,894	301,657	-	-	2,508,551	a. Not Due
	b. Telah Jatuh Tempo	794,318	242,117	-	-	1,036,435	b. Due
3	CKPN - Stage 1	62,181	3,541	-	8	65,730	CKPN - Stage 1
4	CKPN - Stage 2	123,497	16,345	-	-	139,842	CKPN - Stage 2
5	CKPN - Stage 3	234,456	140,615	-	-	375,071	CKPN - Stage 3
6	Tagihan yang Dihapus Buku	(373,558)	(26,500)	-	-	(400,058)	Receivables Written Off

**Tabel Pengungkapan Tagihan dan Pencadangan berdasarkan Wilayah – Bank secara Konsolidasi dengan Entitas Anak**  
**Table of Disclosure of Receivables and Allowances by Area - Bank Consolidated with Subsidiaries**

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2021 / 31 December 2021				Total	Description
		Tagihan Bersih Berdasarkan Wilayah Net Receivables by Region					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	Tagihan	22,092,884	1,282,111	-	212,577	23,587,572	Receivables
2	Tagihan yang Mengalami Peningkatan dan Pemburukan Risiko Kredit (Stage 2 dan Stage 3)						Claims with Increased and Worsening Credit Risk (Stage 2 and Stage 3)
	a. Belum Jatuh Tempo	1,100,274	494,531	-	-	1,594,805	a. Not Due
	b. Telah Jatuh Tempo	912,835	231,220	-	-	1,144,055	b. Due
3	Entitas Induk						Parent Entity
	CKPN - Stage 1	100,006	5,075	-	3	105,085	CKPN - Stage 1
	CKPN - Stage 2	56,648	23,152	-	-	79,800	CKPN - Stage 2
	CKPN - Stage 3	378,405	99,362	-	-	477,767	CKPN - Stage 3
4	Entitas Anak						Subsidiaries
	CKPN Individu	46,516	-	-	-	46,516	Individual CKPN
	CKPN Kolektif	4,255	-	-	-	4,255	Collective CKPN
5	Tagihan yang Dihapus Buku	(419,271)	(6,492)	-	-	(425,763)	Receivables Written Off
(dalam juta Rupiah / in million Rupiah)							
No.	Keterangan	31 Desember 2020 / 31 December 2020				Total	Description
		Tagihan Bersih Berdasarkan Wilayah Net Receivables by Region					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	Tagihan	22,673,815	1,527,803	-	111,074	24,312,692	Receivables
2	Tagihan yang Mengalami Peningkatan dan Pemburukan Risiko Kredit (Stage 2 dan Stage 3)						Claims with Increased and Worsening Credit Risk (Stage 2 and Stage 3)
	a. Belum Jatuh Tempo	2,233,794	301,657	-	-	2,535,451	a. Not Due
	b. Telah Jatuh Tempo	918,528	242,117	-	-	1,160,645	b. Due
3	Entitas Induk						Parent Entity
	CKPN - Stage 1	62,181	3,541	-	8	65,730	CKPN - Stage 1
	CKPN - Stage 2	123,497	16,345	-	-	139,842	CKPN - Stage 2
	CKPN - Stage 3	234,456	140,615	-	-	375,071	CKPN - Stage 3
4	Entitas Anak						Subsidiaries
	CKPN Individu	19,647	-	-	-	(19,647)	Individual CKPN
	CKPN Kolektif	6,751	-	-	-	(6,751)	Collective CKPN
5	Tagihan yang Dihapus Buku	(433,322)	(26,500)	-	-	(459,822)	Receivables Written Off

**Tabel Pengungkapan Tagihan dan Pencadangan berdasarkan Sektor Ekonomi – Bank secara Individual**  
**Table of Disclosure of Receivables and Allowances by Economic Sector – Bank, Individually**

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	31 Desember 2021 / 31 December 2021										Economic Sector
		Tagihan Receivables		Tagihan yang Mengalami Penurunan Nilai		Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 1 Losses Allowance (ILA) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 2 Losses Allowance (ILA) - Stage 2	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 3 Losses Allowance (ILA) - Stage 3	Tagihan yang Dihapus Buku Receivables Written Off			
		Belum Jatuh Tempo Not Due	Jatuh Tempo Due	Belum Jatuh Tempo	Telah Jatuh Tempo							
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)			
1	Pertanian, Kehutanan, dan Perikanan	493,816	-	-	6,418	-	-	(330)	Agriculture, Forestry, and Fisheries			
2	Pertambangan dan Penggalian	43,345	2,842	6	146	13	2	(43,263)	Mining and Extractive Industries			
3	Industri Pengolahan	1,637,808	179,741	63,006	5,822	3,790	36,739	(224,484)	Processing Industry			
4	Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin	227,443	-	-	1,380	-	-	-	Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air			
5	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah	23,985	-	-	20	-	-	-	Water Management, Waste Water Management, Waste Management and Recycle			
6	Konstruksi	1,139,078	-	160,817	12,700	-	83,881	-	Construction			
7	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor	1,947,172	112,972	55,875	9,566	4,687	15,350	(4,409)	Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance			
8	Pengangkutan dan Pergudangan	315,692	-	5,613	3,726	-	1,169	-	Transportation and Warehousing			
9	Penyediaan Akomodasi dan Penyediaan Makanan Minum	1,595,796	572,895	269,238	8,410	27,106	113,393	(2,996)	Provision of Accommodation and Foods & Beverages			
10	Informasi dan Komunikasi	173,175	-	-	467	-	-	(11)	Information and Communication			
11	Aktivitas Keuangan dan Asuransi	5,571,468	9,046	-	7,272	142	-	(50,661)	Financial and Insurance Activities			
12	Real Estate	2,664,572	613,844	391,149	38,442	41,560	188,312	(84,555)	Real Estate			
13	Aktivitas Profesi, Ilmiah, dan Teknis	662,603	-	7,689	4,434	-	2,074	-	Professional, Scientific, and Technical Activities			
14	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya	360,107	9,798	53,089	1,502	25	20,935	-	Leasing and Leasing Activities without Option Rights, Employment, Travel Agencies, and Other Business Supports			
15	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib	2,658,644	-	-	-	-	-	-	Government Administration, Land Business, and Mandatory Social Service			
16	Pendidikan	176,938	42,423	6,797	1,613	2,262	2,105	-	Education			
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	5,956	-	-	32	-	-	(1,700)	Human Health Activities and Social Activities			
18	Kesenian, Hiburan, dan Rekreasi	148,046	971	-	886	16	-	-	Arts, Entertainment, and Recreation			
19	Aktivitas Jasa Lainnya	190,781	2,847	20,802	1,162	34	3,937	-	Other Services Activities			
20	Aktivitas Rumah Tangga sebagai Pemberi Kerja	-	-	-	-	-	-	(13,354)	Household Activities as Employer			
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	-	-	-	-	-	-	-	International Organizations and Other Extra International Organizations Activities			
22	Bukan Lapangan Usaha	205,720	3,836	33,063	1,087	165	9,871	-	Non-Business			
23	Lainnya	1,707,745	-	-	-	-	-	-	Others			
	<b>Total</b>	<b>21,949,890</b>	<b>1,551,215</b>	<b>1,067,144</b>	<b>105,085</b>	<b>79,800</b>	<b>477,767</b>	<b>(425,763)</b>	<b>Total</b>			

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	31 Desember 2020 / 31 December 2020										Economic Sector	
		Tagihan Receivables		Tagihan yang Mengalami Penurunan Nilai		Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 1		Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 2		Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 3			Tagihan yang Dihapus Buku Receivables Written Off
		(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)				
				Belum Jatuh Tempo	Telaah Jatuh Tempo	Due							
				Not Due									
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)				
1	Pertanian, Kehutanan, dan Perikanan	352,499	-	2,634	2,938	-	563	-	-	-	-	-	Agriculture, Forestry, and Fisheries
2	Pertambangan dan Penggalian	141,240	4,201	43,264	251	42	5,870	(26,500)	-	-	-	(26,500)	Mining and Extractive Industries
3	Industri Pengolahan	1,540,129	360,654	67,468	7,275	17,434	36,498	(99,025)	-	-	-	(99,025)	Processing Industry
4	Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin	247,784	-	-	1,263	-	-	-	-	-	-	-	Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air
5	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah	26,165	-	-	121	-	-	-	-	-	-	-	Water Management, Waste Water Management, Waste Management and Recycle
6	Konstruksi	739,039	187,543	134,759	2,376	10,331	64,686	(14,890)	-	-	-	(14,890)	Construction
7	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor	1,469,369	223,733	59,253	8,581	8,764	12,667	(25,073)	-	-	-	(25,073)	Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance
8	Pengangkutan dan Pergudangan	363,144	2,546	6,089	1,912	220	1,336	(16,758)	-	-	-	(16,758)	Transportation and Warehousing
9	Penyediaan Akomodasi dan Penyediaan Mekan Minum	1,720,568	516,324	193,139	11,979	32,530	118,976	-	-	-	-	-	Provision of Accommodation and Foods & Beverages
10	Informasi dan Komunikasi	3,096	131	-	29	9	-	-	-	-	-	-	Information and Communication
11	Aktivitas Keuangan dan Asuransi	5,664,475	9,496	-	8,443	683	-	(175,893)	-	-	-	(175,893)	Financial and Insurance Activities
12	Real Estate	3,286,080	440,476	436,098	14,265	21,948	92,847	(101,788)	-	-	-	(101,788)	Real Estate
13	Aktivitas Profesi, Ilmiah, dan Teknis	841,614	354,361	17,458	2,861	14,149	3,899	-	-	-	-	-	Professional, Scientific, and Technical Activities
14	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi; Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya	139,786	60,759	4,384	464	12,702	947	-	-	-	-	-	Leasing and Leasing Activities without Option Rights, Employment, Travel Agencies, and Other Business Supports
15	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib	2,547,024	-	-	-	-	-	-	-	-	-	-	Government Administration, Land Business, and Mandatory Social Service
16	Pendidikan	174,188	100,251	6,786	382	6,539	2,309	-	-	-	-	-	Education
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	184,518	172,890	1,700	101	6,848	360	-	-	-	-	-	Human Health Activities and Social Activities
18	Kesenian, Hiburan, dan Rekreasi	120,686	-	-	804	-	-	-	-	-	-	-	Arts, Entertainment, and Recreation
19	Aktivitas Jasa Lainnya	193,195	66,560	1,220	775	6,599	274	-	-	-	-	-	Other Services Activities
20	Aktivitas Rumah Tangga sebagai Pemberi Kerja	-	-	-	-	-	-	-	-	-	-	-	Household Activities as Employer
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	-	-	-	-	-	-	-	-	-	-	-	International Organizations and Other Extra International Organizations Activities
22	Bukan Lapangan Usaha	259,426	8,627	62,183	909	1,043	33,839	(132)	-	-	-	(132)	Non-Business
23	Lainnya	2,005,099	-	-	-	-	-	-	-	-	-	-	Others
	<b>Total</b>	<b>22,019,124</b>	<b>2,508,551</b>	<b>1,036,435</b>	<b>65,730</b>	<b>139,842</b>	<b>375,071</b>	<b>(400,058)</b>	<b>(400,058)</b>	<b>(400,058)</b>	<b>(400,058)</b>	<b>(400,058)</b>	<b>Total</b>

**Tabel Pengungkapan Tagihan dan Pencadangan berdasarkan Sektor Ekonomi – Bank secara Konsolidasi dengan Entitas Anak**  
**Table of Disclosure of Receivables and Allowances by Economic Sector - Bank Consolidated with Subsidiaries**

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	31 Desember 2021 / 31 December 2021										Economic Sector							
		Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Entitas Induk Parent Entity			Entitas Anak Subsidiaries		Tagihan yang Dihapus Buku Receivables Written Off	(11)	(10)		(9)	(8)	(7)	(6)	(5)	(4)	(3)
		Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 2	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 3	Cadangan Kerugian Penurunan Nilai - Individual Impairment Losses Allowance (ILA)	Cadangan Kerugian Penurunan Nilai Kolektif Collective Impairment Losses Allowance (ILA)											
(1)																			(2)
1	Pertanian, Kehutanan, dan Perikanan	493,816	-	-	6,418	-	-	-	-	-	-	-	-	-	-	-	-	-	(330)
2	Pertambangan dan Penggalian	79,337	2,842	6	146	13	13	2	-	-	11	-	-	-	-	-	-	-	(43,263)
3	Industri Pengolahan	1,742,886	207,252	79,147	5,822	3,790	3,790	36,739	15,728	15,728	611	-	-	-	-	-	-	-	(224,484)
4	Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin	227,443	-	-	1,380	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah	43,680	-	-	20	-	-	-	-	-	6	-	-	-	-	-	-	-	-
6	Konstruksi	1,160,110	-	166,322	12,700	-	-	83,881	-	-	71	-	-	-	-	-	-	-	-
7	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor	2,013,288	112,972	70,744	9,566	4,687	4,687	15,350	5,835	5,835	444	-	-	-	-	-	-	-	(4,409)
8	Pengangkutan dan Pergudangan	328,058	-	5,613	3,726	-	-	1,169	-	-	50	-	-	-	-	-	-	-	-
9	Penyediaan Akomodasi dan Penyediaan Makanan Minum	1,644,236	588,279	278,180	8,410	27,106	113,393	1,445	1,445	8	8	-	-	-	-	-	-	-	(2,996)
10	Informasi dan Komunikasi	173,175	-	-	467	-	-	-	-	-	-	-	-	-	-	-	-	-	(11)
11	Aktivitas Keuangan dan Asuransi	5,804,940	9,046	20,422	7,272	142	142	-	20,343	20,343	632	-	-	-	-	-	-	-	(50,661)
12	Real Estate	2,789,261	613,844	391,149	38,442	41,560	188,312	2,074	-	-	985	-	-	-	-	-	-	-	(84,555)
13	Aktivitas Profesi, Ilmiah, dan Teknis	901,631	-	7,689	4,434	-	-	2,074	-	-	6	-	-	-	-	-	-	-	-
14	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penujangan Usaha Lainnya	406,891	10,256	61,978	1,502	25	20,935	3,148	3,148	469	-	-	-	-	-	-	-	-	-
15	Pertahanan, dan Jaminan Sosial Wajib	3,192,028	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Pendidikan	176,938	42,423	6,797	1,613	2,262	2,105	-	-	-	-	-	-	-	-	-	-	-	-
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	5,956	-	-	32	-	-	-	-	-	-	-	-	-	-	-	-	-	(1,700)
18	Kesenian, Hiburan, dan Rekreasi	159,076	971	-	886	16	-	-	-	-	569	-	-	-	-	-	-	-	-

31 Desember 2021 / 31 December 2021											
No.	Sektor Ekonomi	Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Entitas Induk Parent Entity			Entitas Anak Subsidiaries		Tagihan yang Dihapus Buku Receivables Written Off	Economic Sector	
		Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 2	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 3	Cadangan Kerugian Penurunan Nilai (CKPN) - Individual Impairment Losses Allowance (ILA)	Cadangan Kerugian Penurunan Nilai (CKPN) - Kolektif Collective Impairment Losses Allowance (ILA)			
(1)	(2)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(2)	
19	Aktivitas Jasa Lainnya	191,788	21,331	1,162	34	3,937	-	57	-	Other Services Activities	
20	Aktivitas Rumah Tangga sebagai Pemberi Kerja	-	-	-	-	-	-	-	(13,354)	Household Activities as Employer	
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	-	-	-	-	-	-	-	-	International Organizations and Other Extra International Organizations Activities	
22	Bukan Lapangan Usaha	239,738	34,677	1,087	165	9,871	18	338	-	Non-Business	
23	Lainnya	1,813,296	-	-	-	-	-	-	-	Others	
<b>Total</b>		<b>23,587,571</b>	<b>1,144,055</b>	<b>105,085</b>	<b>79,800</b>	<b>477,767</b>	<b>46,516</b>	<b>4,255</b>	<b>(425,763)</b>	<b>Total</b>	

(dalam juta Rupiah / in million Rupiah)

31 Desember 2020 / 31 December 2020											
No.	Sektor Ekonomi	Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Entitas Induk Parent Entity			Entitas Anak Subsidiaries		Tagihan yang Dihapus Buku Receivables Written Off	Economic Sector	
		Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 2	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 3	Cadangan Kerugian Penurunan Nilai (CKPN) - Individual Impairment Losses Allowance (ILA)	Cadangan Kerugian Penurunan Nilai (CKPN) - Kolektif Collective Impairment Losses Allowance (ILA)			
(1)	(2)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(2)	
1	Pertanian, Kehutanan, dan Perikanan	-	2,634	2,938	-	563	-	-	-	Agriculture, Forestry, and Fisheries	
2	Pertambangan dan Penggalian	4,201	43,264	251	42	5,870	-	223	26,500	Mining and Extractive Industries	
3	Industri Pengolahan	360,654	68,136	7,275	17,434	36,498	11,696	1,119	39,025	Processing Industry	



No.	Sektor Ekonomi	31 Desember 2020 / 31 December 2020											Economic Sector	
		Tagihan yang Mengalami Penurunan Nilai Impaired Receivables			Entitas Induk Parent Entity			Entitas Anak Subsidiaries		Tagihan yang Dihapus Buku Receivables Written Off				
		Tagihan Receivables	Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 2	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 3	Cadangan Kerugian Penurunan Nilai (CKPN) - Individual Impairment Losses Allowance (ILA) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - Individual Impairment Losses Allowance (ILA) - Stage 2		Cadangan Kerugian Penurunan Nilai (CKPN) - Collective Impairment Losses Allowance (ILA)			
(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(2)					
4	Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin	247,784	-	-	1,263	-	-	-	-	-	-	-	-	Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air
5	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah	26,165	-	-	121	-	-	-	-	-	-	-	-	Water Management, Waste Water Management, Waste Management and Recycle
6	Konstruksi	790,186	187,543	140,371	2,376	10,331	64,686	5,000	129	14,890	-	-	-	Construction
7	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor	1,549,699	227,557	70,400	8,581	8,764	12,667	647	788	25,073	-	-	-	Wholesale and Retail Trade, Car and Motorcycle Repair and Maintenance
8	Pengangkutan dan Per gudangan	367,104	2,546	6,089	1,912	220	1,336	-	40	16,758	-	-	-	Transportation and Warehousing
9	Penyediaan Akomodasi dan Penyediaan Makan Minum	1,769,427	516,977	197,139	11,979	32,530	118,976	1,726	189	-	-	-	-	Provision of Accommodation and Foods & Beverages
10	Informasi dan Komunikasi	3,096	131	-	29	9	-	-	-	-	-	-	-	Information and Communication
11	Aktivitas Keuangan dan Asuransi	5,855,716	30,824	-	8,443	683	-	577	695	175,893	-	-	-	Financial and Insurance Activities
12	Real Estate	3,854,960	440,476	438,118	14,265	21,948	92,847	-	3,234	101,788	-	-	-	Real Estate
13	Aktivitas Profesi, Ilmiah, dan Teknis	841,614	354,361	117,458	2,861	14,149	3,899	-	-	-	-	-	-	Professional, Scientific, and Technical Activities
14	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya	139,786	60,759	4,880	464	12,702	947	-	-	-	-	-	-	Leasing and Leasing Activities without Option Rights, Employment, Travel Agencies, and Other Business Supports
15	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib	2,547,024	-	-	-	-	-	-	-	-	-	-	-	Government Administration, Land Business, and Mandatory Social Service
16	Pendidikan	174,188	100,251	6,786	382	6,539	2,309	-	-	-	-	-	-	Education
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	184,518	172,890	1,700	101	6,848	360	-	-	-	-	-	-	Human Health Activities and Social Activities
18	Kesenian, Hiburan, dan Rekreasi	138,369	-	-	804	-	-	-	230	-	-	-	-	Arts, Entertainment, and Recreation
19	Aktivitas Jasa Lainnya	193,195	67,047	1,220	775	6,599	274	-	-	-	-	-	-	Other Services Activities

No.	Sektor Ekonomi	31 Desember 2020 / 31 December 2020										Economic Sector		
		Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Entitas Induk Parent Entity			Entitas Anak Subsidiaries		Tagihan yang Dihapus Buku Receivables Written Off					
		Tagihan Receivables	Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 1 Losses Allowance (ILA) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 2 Losses Allowance (ILA) - Stage 2	Cadangan Kerugian Penurunan Nilai (CKPN) - Stage 3 Losses Allowance (ILA) - Stage 3	Cadangan Kerugian Penurunan Nilai (CKPN) - Individual Impairment Losses Allowance (ILA)	Cadangan Kerugian Penurunan Nilai Kolektif (CKPN) - Collective Impairment Losses Allowance (ILA)					
(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(2)					
20	Aktivitas Rumah Tangga sebagai Pemberi Kerja	-	-	-	-	-	-	-	-	-	-	-	-	Household Activities as Employer
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	-	-	-	-	-	-	-	-	-	-	-	-	International Organizations and Other Extra International Organizations Activities
22	Bukan Lapangan Usaha	259,540	9,235	62,450	909	1,043	33,839	-	-	-	132	-	-	Non-Business
23	Lainnya	3,206,068	-	-	-	-	-	-	-	-	104	59,764	-	Others
	<b>Total</b>	<b>24,312,691</b>	<b>2,535,451</b>	<b>1,160,645</b>	<b>65,730</b>	<b>139,842</b>	<b>375,071</b>	<b>19,647</b>	<b>6,751</b>	<b>459,822</b>				Total

**Tabel Pengungkapan Rincian Mutasi Cadangan Kerugian Penurunan Nilai – Bank secara Individual**  
**Table of Disclosure of Detailed Changes in Allowances for Impairment Losses – Bank Individually**

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2021 31 December 2021			31 Desember 2020 31 December 2020			Description
		Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1	Saldo Awal CKPN	65,730	139,842	375,071	17,922	52,198	302,491	ILA - Starting Balance
2	Pembentukan (Pemulihan) CKPN pada Periode Berjalan (Net)	20,070	(60,042)	954,222	(16,165)	(44,530)	(57,226)	Establishment (Recovery) of ILA in Current Period (Net)
	2.a. Pembentukan CKPN pada Periode Berjalan	7,635	(8,885)	79,363	(7,859)	41,285	111,123	2.a. Establishment of ILA in Current Period
	2.b. Pemulihan CKPN pada Periode Berjalan	12,435	(51,157)	874,860	(8,306)	(85,815)	(168,349)	2.b. Recovery of ILA in Current Period
3	CKPN yang Digunakan untuk Melakukan Hapus Buku atas Tagihan pada Periode Berjalan	-	-	(851,526)	-	-	(400,058)	ILA Used for Writing Off Receivables in Current Period
4	Pembentukan (Pemulihan) Lainnya pada Periode Berjalan	19,285	-	-	63,974	132,174	529,864	Other Establishment (Recovery) in Current Period
	<b>Saldo Akhir CKPN</b>	<b>105,085</b>	<b>79,800</b>	<b>477,767</b>	<b>65,730</b>	<b>139,842</b>	<b>375,071</b>	<b>ILA - Ending Balance</b>

**Tabel Pengungkapan Rincian Mutasi Cadangan Kerugian Penurunan Nilai – Bank secara Konsolidasi dengan Entitas Anak**  
 Table of Disclosure of Detailed Changes in Allowances for Impairment Losses – Bank Consolidated with Subsidiaries

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2021 31 December 2021			31 Desember 2020 31 December 2020			Description				
		Entitas Induk Parent Entity		Entitas Anak Subsidiaries	Entitas Induk Parent Entity		Entitas Anak Subsidiaries					
		Stage 1	Stage 2		Stage 3	Stage 1			Stage 2	Stage 3		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(2)
1	Saldo Awal CKPN	65,730	139,842	375,071	19,647	6,751	17,922	52,198	302,491	17,784	6,227	ILA - Starting Balance
2	Pembentukan (Pemulihan) CKPN pada Periode Berjalan (Net)	20,070	(60,042)	954,222	35,434	8,277	(16,165)	(44,530)	(57,226)			Establishment (Recovery) of ILA in Current Period (Net)
	2.a. Pembentukan CKPN pada Periode Berjalan	7,635	(8,885)	79,363	31,152	2,890	(7,859)	41,285	111,123	4,114	34	2.a. Establishment of ILA in Current Period
	2.b. Pemulihan CKPN pada Periode Berjalan	12,435	(51,157)	874,860	4,282	5,387	(8,306)	(85,815)	(168,349)	(5,890)	(558)	2.b. Recovery of ILA in Current Period
3	CKPN yang Digunakan untuk Melakukan Hapus Buku atas Tagihan pada Periode Berjalan	-	-	(851,526)	-	-	-	-	(400,058)	(1,483)	-	ILA Used for Writing Off Receivables in Current Period
4	Pembentukan (Pemulihan) Lainnya pada Periode Berjalan	19,285	-	-	-	-	63,974	132,174	529,864	5,122	-	Other Establishment (Recovery) in Current Period
	<b>Saldo Akhir CKPN</b>	<b>105,085</b>	<b>79,800</b>	<b>477,767</b>	<b>46,516</b>	<b>4,255</b>	<b>65,730</b>	<b>139,842</b>	<b>375,071</b>	<b>19,647</b>	<b>6,751</b>	<b>ILA - Ending Balance</b>

**Tabel Pengungkapan Tagihan Bersih berdasarkan Kategori Portofolio dan Skala Peringkat – Bank secara Individual**  
**Table of Disclosure of Net Receivables by Portfolio Category and Rating Scale – Bank Individually**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2021/ 31 December 2021														Portfolio Category				
		Lembaga Peringkat Rating Agency	Peringkat Jangka Panjang Long Term Rating							Peringkat Jangka Pendek Short Term Rating										
			AAA AAA	AA+ s.d AA- AA+ to AA-	A+ s.d A- A+ to A-	BBB+ s.d BBB- BBB+ to BBB-	BB+ s.d BB- BB+ to BB-	B+ s.d B- B+ to B-	Kurang dari B- Lower than B-	A-1 A-1	A-2 A-2	A-3 A-3	Kurang dari A-3 Lower than A-3	F1+ s.d F1 F1+ s.d F1	F2 F2		F3 F3	Kurang dari F3 Lower than F3	P-1 P-1	P-2 P-2
Standard and Poor's	Fitch Rating	Moody's	PT Fitch Ratings Indonesia	PT Peringkat Efek Indonesia	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(2)		
1	Tagihan kepada Pemerintah	96,260	250,349	395,351	235,411	-	-	-	-	-	-	-	-	-	-	-	4,130,048	4,130,048	Receivables from Government	
2	Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	311,106	1,288,477	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,523	2,523	Receivables from Multilateral Development Banks and International Institutions	
4	Tagihan kepada Bank	51,677	59,344	-	-	-	-	-	80,829	-	-	-	1,035	-	-	-	1,327,879	1,520,763	Receivables from Banks	
5	Kredit Beragunan Rumah Tinggal	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	95,711	95,711	Residential Property Collateralized Loans	
6	Kredit Beragun Properti Komersial	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,217,454	1,217,454	Commercial Property Collateralized Loans	
7	Kredit Pegawai/Pensiun	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans	
8	Tagihan kepada Usaha Mikro Usaha Kecil dan Portofolio Ritel	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	78,387	78,387	Receivables from Microbusiness, Small Business, and Retail Portfolio	
9	Tagihan kepada Korporasi	74,984	535,703	349,881	461,427	-	-	-	-	-	-	-	-	-	-	-	10,649,680	12,071,674	Receivables from Corporations	
10	Tagihan yang Telah Jatuh Tempo	-	-	-	13,288	-	-	-	-	-	-	-	-	-	-	-	585,752	599,040	Due Receivables	
11	Aset Lainnya	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,707,745	1,707,745	Other Assets	
	<b>TOTAL</b>	222,921	845,396	745,232	710,126	-	-	-	80,829	-	-	-	1,035	-	-	-	20,106,284	22,711,823	<b>TOTAL</b>	

(dalam juta Rupiah / in million Rupiah)

		31 Desember 2020 / 31 December 2020															
No.	Kategori Portofolio	Lembaga Pemeringkat Rating Agency	Tagihan Bersih Net Receivables													Total	Portfolio Category
			Peringkat Jangka Panjang Long Term Rating						Peringkat Jangka Pendek Short Term Rating						Tanpa Peringkat Not Rated		
			AAA AAA	AA+ s.d AA- AA+ to AA-	A+ s.d A- A+ to A-	BBB+ s.d BBB-	BB+ s.d BB-	BB s.d BB-	B+ s.d B- B+ to B-	B s.d B- B to B-	Kurang dari B- Lower than B-	A-1 A-1	A-2 A-2	A-3 A-3			
AAA AAA	AA+ s.d AA- AA+ to AA-	A+ s.d A- A+ to A-	BBB+ s.d BBB-	BB+ s.d BB-	BB s.d BB-	B+ s.d B- B+ to B-	B s.d B- B to B-	Kurang dari B- Lower than B-	F1 + s.d F1 F1 + s.d F1	F2 F2	F3 F3	Kurang dari F3 Lower than F3	P-1 P-1	P-2 P-2	P-3 P-3	Kurang dari P-3 Lower than P-3	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(2)	
1	Tagihan kepada Pemerintah		-	-	-	-	-	-	-	-	-	-	-	-	4,287,133	4,287,133	Receivables from Government
2	Tagihan kepada Entitas Sektor Publik		36,779	251,508	46,969	-	-	-	-	-	-	-	-	-	546,479	881,734	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional		-	-	-	-	-	-	-	-	-	-	-	-	1,761	1,761	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank		264,480	59,230	-	-	-	19,191	-	925	-	-	-	-	1,355,192	1,699,018	Receivables from Banks
5	Kredit Beragunan Rumah Tinggal		-	-	-	-	-	-	-	-	-	-	-	-	72,087	72,087	Residential Property Collateralized Loans
6	Kredit Beragun Properti Komersial		-	-	-	-	-	-	-	-	-	-	-	-	1,285,086	1,285,086	Commercial Property Collateralized Loans
7	Kredit Pegawai/Pensiun		-	-	-	-	-	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans
8	Tagihan kepada Usaha Mikro Usaha Kecil dan Portofolio Ritel		-	-	-	-	-	-	-	-	-	-	-	-	61,306	61,306	Receivables from Microbusiness, Small Business, and Retail Portfolio
9	Tagihan kepada Korporasi		40,651	267,663	497,721	102,780	-	-	5,470	-	-	-	-	-	10,600,040	11,514,324	Receivables from Corporations
10	Tagihan yang Telah Jatuh Tempo		-	-	-	20,965	-	-	-	-	-	-	-	-	650,062	671,027	Due Receivables
11	Aset Lainnya		-	-	-	-	-	-	-	-	-	-	-	-	2,005,099	2,005,099	Other Assets
	<b>TOTAL</b>		<b>341,910</b>	<b>578,400</b>	<b>544,689</b>	<b>123,745</b>	<b>-</b>	<b>19,191</b>	<b>5,470</b>	<b>925</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>20,864,243</b>	<b>22,476,575</b>	<b>TOTAL</b>







**Tabel Pengungkapan Tagihan Bersih berdasarkan Bobot Risiko Setelah Memperhitungkan Dampak Mitigasi Risiko Kredit – Bank secara Individual**  
**Table of Disclosure of Net Receivables by Risk Weight After Calculating Credit Risk Mitigation Impact – Bank, Individually**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	31 Desember 2021 / 31 December 2021										31 Desember 2020 / 31 December 2020										Beban Modal Capital Expenses							
		Tagihan Bersih Setelah Memperhitungkan Dampak Mitigasi Risiko Kredit Net Receivables Accounting Credit Risk Mitigation Impact										Tagihan Bersih Setelah Memperhitungkan Dampak Mitigasi Risiko Kredit Net Receivables Accounting Credit Risk Mitigation Impact											ATMR RWA						
		0%	20%	25%	35%	40%	45%	50%	75%	100%	150%	Lainnya Other	0%	20%	25%	35%	40%	45%	50%	75%	100%			150%	Lainnya Other				
(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)				
<b>A Eksposur Laporan Posisi Keuangan</b>																													
<b>Balance Sheet Exposure</b>																													
1	Tagihan kepada Pemerintah Receivables from Government	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
2	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	57,322	-	-	-	-	435,934	-	-	-	-	493,256	54,209	-	7,356	-	-	-	-	422,478	-	-	-	-	-	-	-	-	429,833
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
4	Tagihan kepada Bank Receivables from Banks	287,370	-	-	-	-	41,588	-	-	-	-	328,959	36,153	-	326,048	-	-	-	-	31,252	-	-	-	-	-	-	-	357,300	
5	Kredit Beragun Rumah Tinggal Residential Property Collateralized Loans	4,602	10,235	11,116	-	-	-	-	-	-	-	25,953	2,852	-	2,840	4,625	13,785	-	-	-	-	-	-	-	-	-	-	21,250	
6	Kredit Beragun Properti Komersial Commercial Property Collateralized Loans	-	-	-	-	-	-	-	-	1,195,886	-	1,195,886	131,428	-	-	-	-	-	-	-	-	-	1,261,486	-	-	-	-	1,261,486	
7	Kredit Pegawai/Pensiunan Employee/Retirement Loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	-	-	-	-	-	-	49,630	-	-	-	49,630	5,454	-	-	-	-	-	-	-	-	40,893	-	-	-	-	-	40,893	
9	Tagihan kepada Korporasi Receivables from Corporations	122,137	-	-	-	-	169,940	-	9,318,535	-	-	9,610,613	1,056,206	-	61,663	-	-	-	248,860	-	-	8,772,777	8,204	-	-	-	-	9,091,504	
10	Tagihan yang Telah Jatuh Tempo Due Receivables	-	-	-	-	-	-	-	129,762	703,918	-	833,679	91,621	-	-	-	-	-	-	-	-	121,779	823,872	-	-	-	-	945,651	
11	Aset Lainnya Other Assets	-	-	-	-	-	-	-	-	-	2,204,953	242,324	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,608,251	
<b>Total Eksposur Laporan Posisi Keuangan</b> <b>Total Balance Sheet Exposure</b>		<b>471,432</b>	<b>10,235</b>	<b>11,116</b>	<b>-</b>	<b>-</b>	<b>647,463</b>	<b>49,630</b>	<b>10,644,184</b>	<b>703,918</b>	<b>2,204,953</b>	<b>14,742,930</b>	<b>1,620,248</b>	<b>-</b>	<b>397,906</b>	<b>4,625</b>	<b>13,785</b>	<b>-</b>	<b>702,590</b>	<b>40,893</b>	<b>-</b>	<b>10,156,042</b>	<b>832,076</b>	<b>2,608,251</b>	<b>14,756,168</b>	<b>1,621,703</b>	<b>-</b>	<b>14,756,168</b>	



(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	31 Desember 2021 / 31 December 2021										31 Desember 2020 / 31 December 2020						Beban Modal Capital Expenses	ATMR RWA	Beban Modal Capital Expenses								
		Tagihan Bersih Setelah Memperhitungkan Dampak Mitigasi Risiko Kredit Net Receivables Accounting Credit Risk Mitigation Impact										Tagihan Bersih Setelah Memperhitungkan Dampak Mitigasi Risiko Kredit Net Receivables Accounting Credit Risk Mitigation Impact																
		0%	20%	25%	35%	40%	45%	50%	75%	100%	150%	Lainnya Other	0%	20%	25%	35%	40%				45%	50%	75%	100%	150%	Lainnya Other		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	
<b>C</b> Eksposur akibat Kegagalan Pihak Lawan (Counterparty Credit Risk)																												
1	Tagihan kepada Pemerintah Receivables from Government	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Tagihan kepada Bank Receivables from Banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Tagihan kepada Korporasi Receivables from Corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Total Eksposur Counterparty Credit Risk</b> Total Counterparty Credit Risk Exposure		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	31 Desember 2021 / 31 December 2021															31 Desember 2020 / 31 December 2020											
		Tagihan Bersih Setelah Memperhitungkan Dampak Mitigasi Risiko Kredit Net Receivables Accounting Credit Risk Mitigation Impact															Tagihan Bersih Setelah Memperhitungkan Dampak Mitigasi Risiko Kredit Net Receivables Accounting Credit Risk Mitigation Impact											
		0%	20%	25%	35%	40%	45%	50%	75%	100%	150%	Lainnya Other	ATMR RWA	Beban Modal Capital Expenses	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	
(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)			
<b>B Eksposur Kewajiban Komitmen/Kontinjensi pada Transaksi Rekening Administratif</b> Commitment Liability Exposure/Contingencies on Administrative Account Transactions																												
1	Tagihan kepada Pemerintah Receivables from Government	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	-	-	-	-	-	65,000	-	-	-	-	65,000	7,144	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	-	-	-	-	-	1,262	-	-	-	-	1,262	139	-	-	-	-	-	-	880	-	-	-	-	-	880	97	-
4	Tagihan kepada Bank Receivables from Banks	-	-	-	-	-	367	-	-	-	-	367	40	-	-	-	-	-	-	634	-	-	-	-	-	634	70	-
5	Kredit Beragun Rumah Tinggal Residential Property Collateralized Loans	-	-	1,155	-	-	-	-	-	-	-	1,155	127	-	-	-	-	-	-	-	-	-	-	-	-	565	62	-
6	Kredit Beragun Properti Komersial Commercial Property Collateralized Loans	-	-	-	-	-	-	-	-	-	-	21,568	2,370	-	-	-	-	-	-	-	-	23,600	-	-	-	23,600	2,594	-
7	Kredit Pegawai/Pensiunan Employee/Retirement Loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	-	-	-	-	-	-	-	2,837	-	-	2,837	312	-	-	-	-	-	-	-	3,194	-	-	-	-	3,194	351	-
9	Tagihan kepada Korporasi Receivables from Corporations	-	-	-	-	-	-	-	-	-	-	480,404	52,796	-	-	-	-	-	-	-	-	491,735	-	-	-	491,735	54,042	-
10	Tagihan yang Telah Jatuh Tempo Due Receivables	-	-	-	-	-	-	-	-	-	-	4,500	495	-	-	-	-	-	-	-	-	-	1	-	-	1	0	-
<b>Total Eksposur Transaksi Rekening Administratif</b> Total TRA Exposure		-	-	1,155	-	-	-	66,629	2,837	501,972	4,500	577,092	63,422	-	-	565	-	-	1,514	3,194	515,335	-	-	-	520,609	57,215	-	

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	31 Desember 2021 / 31 December 2021										Beban Modal Capital Expenses	ATMR RWA	31 Desember 2020 / 31 December 2020					Beban Modal Capital Expenses									
		Tagihan Bersih Setelah Memperhitungkan Dampak Mitigasi Risiko Kredit Net Receivables Accounting Credit Risk Mitigation Impact												Tagihan Bersih Setelah Memperhitungkan Dampak Mitigasi Risiko Kredit Net Receivables Accounting Credit Risk Mitigation Impact														
		0%	20%	25%	35%	40%	45%	50%	75%	100%	150%			Lainnya Other	0%	20%	25%	35%		40%	45%	50%	75%	100%	150%	Lainnya Other		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	
<b>C</b> <b>Eksposur akibat Kegiatan Pihak Lawan (Counterparty Credit Risk)</b>																												
<b>Counterparty Credit Risk Exposure</b>																												
1	Tagihan kepada Pemerintah Receivables From Government	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
2	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
4	Tagihan kepada Bank Receivables from Banks	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
5	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
6	Tagihan kepada Korporasi Receivables from Corporations	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
<b>Total Eksposur Counterparty Credit Risk</b>		.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.
Total Counterparty Credit Risk Exposure		.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.



**Tabel Pengungkapan Tagihan Bersih dan Teknik Mitigasi Risiko Kredit - Bank secara Individual**  
**Table of Disclosure of Net Receivables and Credit Risk Mitigation Technique - Bank Individually**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2021 / 31 December 2021				31 Desember 2020 / 31 December 2020				Bagian yang Tidak Dijamin Part Not Guaranteed	Portfolio Category				
		Tagihan Bersih Net Receivables		Bagian yang Dijamin dengan Part Guaranteed by		Tagihan Bersih Net Receivables		Bagian yang Dijamin dengan Part Guaranteed by							
		(3)	(4)	(5)	(6)	(7)	(8) = (3) - [(4)+(5)+(6)+(7)]	(9)	(10)			(11)	(12)	(13)	(14)=(9)- [(10)+(11)+(12)+(13)]
<b>A Eksposur Laporan Posisi Keuangan</b>															
1	Tagihan kepada Pemerintah	3,439,333	-	-	-	-	-	-	-	3,839,328	-	-	-	3,839,328	Receivables from Government
2	Tagihan kepada Entitas Sektor Publik	1,158,477	-	-	-	-	-	-	-	881,734	-	-	-	881,734	Receivables from Public Sector Entities
3	Tagihan kepada Bank, Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	1,520,029	-	-	-	-	-	-	-	1,697,750	5,006	-	-	1,692,744	Receivables from Banks
5	Kredit Beragun Rumah Tinggal	95,711	-	-	-	-	-	-	-	72,087	-	-	-	72,087	Residential Property Collateralized Loans
6	Kredit Beragun Properti Komersial	1,195,886	-	-	-	-	-	-	-	1,261,486	-	-	-	1,261,486	Commercial Property Collateralized Loans
7	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	74,604	8,430	-	-	-	-	-	-	57,047	2,524	-	-	54,523	Receivables from Microbusiness, Small Business, and Retail Portfolio
9	Tagihan kepada Korporasi	11,612,746	1,343,643	-	-	-	-	-	-	11,044,014	1,459,734	-	-	9,584,280	Receivables from Corporations
10	Tagihan yang Telah Jatuh Tempo	599,040	-	-	-	-	-	-	-	671,027	-	-	-	671,027	Due Receivables
11	Aset Lainnya	1,707,745	-	-	-	-	-	-	-	2,005,099	-	-	-	2,005,099	Other Assets
<b>Total Eksposur Laporan Posisi Keuangan</b>		<b>21,403,572</b>	<b>1,352,073</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>21,529,573</b>	<b>1,467,264</b>	<b>-</b>	<b>-</b>	<b>20,062,309</b>	<b>Total Balance Sheet Exposure</b>

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021							31 Desember 2020 / 31 December 2020				Bagian yang Tidak Dijamin Part Not Guaranteed	Portfolio Category	
		Bagian yang Dijamin dengan Part Guaranteed by			Bagian yang Tidak Dijamin Part Not Guaranteed				Bagian yang Dijamin dengan Part Guaranteed by			Bagian yang Tidak Dijamin Part Not Guaranteed			
		Tagihan Bersih Net Receivables	Agunan Collateral	Garansi Guarantee	Asuransi Kredit Loan Insurance	Lainnya Other	Tagihan Bersih Net Receivables	Agunan Collateral	Garansi Guarantee	Asuransi Kredit Loan Insurance	Lainnya Other				
(3)	(4)	(5)	(6)	(7)	(8) = (3) - [(4)+(5)+(6)+(7)]	(9)	(10)	(11)	(12)	(13)	(14) = (9) - [(10)+(11)+(12)+(13)]	(2)			
<b>B Eksposur Transaksi Rekening Administratif</b>															
1	Tagihan kepada Pemerintah	-	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Government
2	Tagihan kepada Entitas Sektor Publik	130,000	-	-	-	-	130,000	-	-	-	-	-	-	-	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	2,523	-	-	-	-	2,523	-	-	-	-	-	1,761	1,761	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	735	-	-	-	-	735	-	-	-	-	-	1,268	1,268	Receivables from Banks
5	Kredit Beragun Rumah Tinggal	-	-	-	-	-	-	-	-	-	-	-	-	-	Residential Property Collateralized Loans
6	Kredit Beragun Properti Komersial	21,568	-	-	-	-	21,568	-	-	-	-	-	23,600	23,600	Commercial Property Collateralized Loans
7	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	3,783	-	-	-	-	3,783	-	-	-	-	-	4,258	4,258	Receivables from Microbusiness, Small Business, and Retail Portfolio
9	Tagihan kepada Korporasi	458,928	4,839	-	-	-	454,089	6,223	-	-	-	-	470,310	464,086	Receivables from Corporations
10	Tagihan yang Telah Jatuh Tempo	-	-	-	-	-	-	-	-	-	-	-	-	-	Due Receivables
<b>Total Eksposur Transaksi Rekening Administratif</b>		<b>617,537</b>	<b>4,839</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>612,698</b>	<b>6,223</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>501,197</b>	<b>494,974</b>	<b>Total TRA Exposure</b>

(dalam juta Rupiah / In million Rupiah)

No.	Kategori Portofolio	31 Desember 2021 / 31 December 2021				31 Desember 2020 / 31 December 2020				Bagian yang Tidak Dijamin Part Not Guaranteed	Portfolio Category			
		Tagihan Bersih Net Receivables		Bagian yang Dijamin dengan Part Guaranteed by		Tagihan Bersih Net Receivables		Bagian yang Dijamin dengan Part Guaranteed by						
		(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)			(11)	(12)	(13)
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(2)
<b>Eksposur Risiko Kredit Akibat Kegagalan Pihak Lawan (Counterparty Credit Risk)</b>														
1	Tagihan kepada Pemerintah	690,715	-	-	-	-	690,715	447,805	-	-	-	-	447,805	Receivables from Government
2	Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Banks
5	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Microbusiness, Small Business, and Retail Portfolio
6	Tagihan kepada Korporasi	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Corporations
<b>Total Eksposur Risiko Kredit Akibat Kegagalan Pihak Lawan (Counterparty Credit Risk)</b>		<b>690,715</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>690,715</b>	<b>447,805</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>447,805</b>	<b>Total Counterparty Credit Risk Exposure</b>
<b>Total (A+B+C)</b>		<b>22,711,823</b>	<b>1,356,912</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>21,354,911</b>	<b>22,478,575</b>	<b>1,473,487</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>20,557,283</b>	<b>Total (A+B+C)</b>

**Tabel Pengungkapan Tagihan Bersih dan Teknik Mitigasi Risiko Kredit - Bank secara Konsolidasi dengan Entitas Anak**  
**Table of Disclosure of Net Receivables and Credit Risk Mitigation Technique – Bank, Consolidated with Subsidiaries**

(dalam juta Rupiah / In million Rupiah)

No.	Kategori Portofolio	31 Desember 2021 / 31 December 2021					31 Desember 2020 / 31 December 2020					Bagian yang Tidak Dijamin Part Not Guaranteed	Portfolio Category	
		Tagihan Bersih Net Receivables	Bagian yang Dijamin dengan Part Guaranteed by			Bagian yang Tidak Dijamin Part Not Guaranteed	Tagihan Bersih Net Receivables	Bagian yang Dijamin dengan Part Guaranteed by			Bagian yang Tidak Dijamin Part Not Guaranteed			
			Agunan Collateral	Garansi Guarantee	Asuransi Kredit Loan Insurance			Agunan Collateral	Garansi Guarantee	Asuransi Kredit Loan Insurance				Lainnya Other
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8) = (3) - [(4)+(5)+(6)+(7)]	(9)	(10)	(11)	(12)	(13)	(14) = (9) - [(10)+(11)+(12)+(13)]	(2)
<b>A Eksposur Laporan Posisi Keuangan</b>														
1	Tagihan kepada Pemerintah	3,985,420	-	-	-	-	3,985,420,34	4,551,584	-	-	-	-	4,551,584	Receivables from Government
2	Tagihan kepada Entitas Sektor Publik	1,158,477	-	-	-	-	1,158,477,45	881,734	-	-	-	-	881,734	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	1,696,824	6,006	-	-	-	1,690,817,52	1,970,760	5,006	-	-	-	1,965,754	Receivables from Banks
5	Kredit Beragun Rumah Tinggal	231,699	-	-	-	-	231,698,78	245,652	-	-	-	-	245,652	Residential Property Collateralized Loans
6	Kredit Beragun Properti Komersial	1,196,386	-	-	-	-	1,196,386,26	1,262,322	-	-	-	-	1,262,322	Commercial Property Collateralized Loans
7	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	75,376	8,430	-	-	-	66,945,69	58,801	2,524	-	-	-	56,277	Receivables from Microbusiness, Small Business, and Retail Portfolio
9	Tagihan kepada Korporasi	12,085,053	1,343,643	-	-	-	10,741,410,17	11,915,800	1,459,734	-	-	-	10,456,066	Receivables from Corporations
10	Tagihan yang Telah Jatuh Tempo	752,205	-	-	-	-	752,205,21	790,237	-	-	-	-	790,237	Due Receivables
11	Aset Lainnya	1,848,154	-	-	-	-	1,848,153,51	2,126,602	-	-	-	-	2,126,602	Other Assets
<b>Total Eksposur Laporan Posisi Keuangan</b>		<b>23,029,594</b>	<b>1,358,080</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>21,671,515</b>	<b>23,803,491</b>	<b>1,467,264</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>22,336,227</b>	<b>Total Balance Sheet Exposure</b>

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2021 / 31 December 2021				Bagian yang Tidak Dijamin Part Not Guaranteed	31 Desember 2020 / 31 December 2020				Bagian yang Tidak Dijamin Part Not Guaranteed	Portfolio Category		
		Tagihan Bersih Net Receivables	Agunan Collateral	Garansi Guarantee	Asuransi Kredit Loan Insurance		Lainnya Other	Tagihan Bersih Net Receivables	Agunan Collateral	Garansi Guarantee			Asuransi Kredit Loan Insurance	Lainnya Other
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8) = (3) - [(4)+(5)+(6)+(7)]	(9)	(10)	(11)	(12)	(13)	(14) = (9) - [(10)+(11)+(12)+(13)]	(2)
<b>Eksposur Transaksi Rekening Administratif</b>														
1	Tagihan kepada Pemerintah	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Government
2	Tagihan kepada Entitas Sektor Publik	130,000	-	-	-	-	130,000	-	-	-	-	-	-	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	2,523	-	-	-	-	2,523	-	-	-	-	-	1,761	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	735	-	-	-	-	735	-	-	-	-	-	1,268	Receivables from Banks
5	Kredit Beragun Rumah Tinggal	4,619	-	-	-	-	4,619	-	-	-	-	-	2,261	Residential Property Collateralized Loans
6	Kredit Beragun Properti Komersial	21,568	-	-	-	-	21,568	-	-	-	-	-	23,600	Commercial Property Collateralized Loans
7	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans
8	Tagihan kepada Usaha Mikro, Kecil dan Portofolio Ritel	3,783	-	-	-	-	3,783	4,258	-	-	-	-	4,258	Receivables from Microbusiness, Small Business, and Retail Portfolio
9	Tagihan kepada Korporasi	485,242	4,839	-	-	-	480,404	497,958	6,223	-	-	-	491,735	Receivables from Corporations
10	Tagihan yang Telah Jatuh Tempo	3,000	-	-	-	-	3,000	1	-	-	-	-	1	Due Receivables
<b>Total Eksposur Transaksi Rekening Administratif</b>		<b>651,469</b>	<b>4,839</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>646,631</b>	<b>531,107</b>	<b>6,223</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>524,883</b>	<b>Total TRA Exposure</b>

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2021 / 31 December 2021							31 Desember 2020 / 31 December 2020				Bagian yang Tidak Dijamin Part Not Guaranteed	Portfolio Category
		Bagian yang Dijamin dengan Part Guaranteed by			Tagihan Bersih Net Receivables	Bagian yang Dijamin dengan Part Guaranteed by			Tagihan Bersih Net Receivables	Bagian yang Dijamin dengan Part Guaranteed by				
		Agunan Collateral	Garansi Guarantee	Asuransi Kredit Loan Insurance		Agunan Collateral	Garansi Guarantee	Asuransi Kredit Loan Insurance		Agunan Collateral	Garansi Guarantee	Lainnya Other		
(3)	(4)	(5)	(6)	(7)	(8) = (3) - [(4)+(5)+(6)+(7)]	(9)	(10)	(11)	(12)	(13)	(14)=(9) - [(10)+(11)+(12)+(13)]			
<b>Eksposur Risiko Kredit Akibat Kegagalan Pihak Lawan (Counterparty Credit Risk)</b>														
1	Tagihan kepada Pemerintah	690,715	-	-	-	-	690,714,57	447,805	-	-	-	-	447,805	Receivables from Government
2	Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Banks
5	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Microbusiness, Small Business, and Retail Portfolio
6	Tagihan kepada Korporasi	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Corporations
<b>Total Eksposur Risiko Kredit Akibat Kegagalan Pihak Lawan (Counterparty Credit Risk)</b>		<b>690,715</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>690,715</b>	<b>447,805</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>447,805</b>	<b>Total Counterparty Credit Risk Exposure</b>
<b>Total (A+B+C)</b>		<b>24,371,779</b>	<b>1,362,918</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>23,008,860</b>	<b>24,782,404</b>	<b>1,473,487</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>23,308,915</b>	<b>Total (A+B+C)</b>

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
**Table of Calculation of RWA of Credit Risks by Standardized Approach**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1	Tagihan kepada Pemerintah	3,439,333	-	-	3,839,328	-	-	Receivables from Government
	a. Tagihan kepada Pemerintah Indonesia	3,439,333	-	-	3,839,328	-	-	a. Claims on the Government of Indonesia
	b. Tagihan kepada Pemerintah Negara Lain	-	-	-	-	-	-	b. Claims on Other Country Governments
2	Tagihan kepada Entitas Sektor Publik	1,158,477	493,256	493,256	881,734	429,833	429,833	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	1,520,029	328,959	328,959	1,697,750	359,803	357,300	Receivables from Banks
	a. Tagihan Jangka Pendek	1,427,401	309,729	309,729	1,446,576	295,073	295,073	a. Short Term Claims
	b. Tagihan Jangka Panjang	92,628	19,230	19,230	251,174	64,731	62,228	b. Long Term Claims
5	Kredit Beragun Rumah Tinggal	95,711	25,953	25,953	72,087	21,250	21,250	Residential Property Collateralized Loans
6	Kredit Beragun Properti Komersial	1,195,886	1,195,886	1,195,886	1,261,486	1,261,486	1,261,486	Commercial Property Collateralized Loans
7	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	Employee/Retirement Loans
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portfolio Ritel	74,604	55,953	49,630	57,047	42,785	40,893	Receivables from Microbusiness, Small Business, and Retail Portfolio
9	Tagihan kepada Korporasi	11,612,746	10,954,256	9,610,613	11,044,014	10,551,238	9,091,504	Receivables from Corporations
10	Tagihan yang Telah Jatuh Tempo	599,040	833,679	833,679	671,027	945,651	945,651	Due Receivables
	a. Kredit Beragun Rumah Tinggal	129,762	129,762	129,762	121,779	121,779	121,779	a. Residential Mortgage Backed Loans
	b. Selain Kredit Beragun Rumah Tinggal	469,278	703,918	703,918	549,248	823,872	823,872	b. Apart from Credit Backed Residential Homes



No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
11	Aset Lainnya	1,707,745	-	2,204,953	2,005,099	-	2,608,251	Other assets
	a. Uang Tunai, Emas, dan Commemorative Coin	52,685	-	-	59,906	-	-	a. Cash, Gold, and Commemorative Coins
	b. Penyertaan (Selain yang Menjadi Faktor Pengurang Modal)	34,858	52,287	52,287	57,339	86,008	86,008	b. Investments (Other Than Those That are Deducting Capital)
	1) Penyertaan Modal Sementara dalam Rangka Restrukturisasi Kredit	34,858	52,287	52,287	57,339	-	86,008	1) Temporary Equity Participation in the Framework of Credit Restructuring
	2) Penyertaan kepada Perusahaan Keuangan yang Tidak Terdaftar di Bursa	-	-	-	-	-	-	2) Participation in Financial Companies That are Not Listed on the Stock Exchange
	3) Penyertaan kepada Perusahaan Keuangan yang Terdaftar di Bursa	-	-	-	-	-	-	3) Participation in Financial Companies Listed on the Stock Exchange
	c. Aset Tetap dan Inventaris Neto	503,589	503,589	503,589	551,368	-	551,368	c. Fixed Assets and Net Inventory
	d. Agunan yang Diambil Alih (AYDA)	1,064,929	1,597,393	1,597,393	1,268,777	-	1,903,166	d. Foreclosed Collateral (AYDA)
	e. Antar Kantor Neto	-	-	-	-	-	-	e. Inter Office Net
	f. Lainnya	51,684	51,684	51,684	67,709	-	67,709	f. Others
	<b>Total</b>	<b>21,403,572</b>	<b>13,887,943</b>	<b>14,742,930</b>	<b>21,529,573</b>	<b>13,612,047</b>	<b>14,756,168</b>	<b>Total</b>

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
**Table of Calculation of RWA of Credit Risks by Standardized Approach**

**Eksposur Aset di laporan posisi keuangan, kecuali Eksposur Sekuritisasi - Bank secara Konsolidasi dengan Entitas Anak**  
**Disclosure of Asset Exposure in the Balance Sheet, except Securitization Exposures - Bank, Consolidated with Subsidiaries**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1	Tagihan kepada Pemerintah	3,985,420	-	-	4,551,587	-	-	Receivables from Government
	a. Tagihan kepada Pemerintah Indonesia	3,985,420	-	-	4,551,587	-	-	a. Claims on the Government of Indonesia
	b. Tagihan kepada Pemerintah Negara Lain	-	-	-	-	-	-	b. Claims on Other Country Governments
2	Tagihan kepada Entitas Sektor Publik	1,158,477	568,361	568,361	881,734	429,833	429,833	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	1,696,824	421,442	418,439	1,970,760	468,786	466,283	Receivables from Banks
	a. Tagihan Jangka Pendek	1,413,783	307,005	307,005	1,445,739	294,905	294,905	a. Short Term Claims
	b. Tagihan Jangka Panjang	283,041	114,437	111,433	525,021	173,881	171,378	b. Long Term Claims
5	Kredit Beragun Rumah Tinggal	231,699	57,195	57,195	245,652	61,368	61,368	Residential Property Collateralized Loans
6	Kredit Beragun Properti Komersial	1,196,386	1,196,386	1,196,386	1,262,322	1,262,322	1,262,322	Commercial Property Collateralized Loans
7	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	Employee/Retirement Loans
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portfolio Ritel	75,376	56,532	50,209	58,801	44,101	42,208	Receivables from Microbusiness, Small Business, and Retail Portfolio
9	Tagihan kepada Korporasi	12,085,053	11,426,563	10,082,920	11,915,800	11,408,710	9,948,976	Receivables from Corporations
10	Tagihan yang Telah Jatuh Tempo	752,205	1,056,827	1,056,827	790,237	1,116,409	1,116,409	Due Receivables
	a. Kredit Beragun Rumah Tinggal	142,962	142,962	142,962	137,893	137,893	137,893	a. Residential Mortgage Backed Loans
	b. Selain Kredit Beragun Rumah Tinggal	609,244	913,865	913,865	652,344	978,516	978,516	b. Apart from Credit Backed Residential Homes

No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
11	Aset Lainnya	1,848,154	-	2,353,823	2,126,602	-	2,777,404	Other assets
	a. Uang Tunai, Emas, dan Commemorative Coin	53,929	-	-	61,723	-	-	a. Cash, Gold, and Commemorative Coins
	b. Penyertaan (Selain yang Menjadi Faktor Pengurang Modal)	34,858	52,287	52,287	57,339	86,008	86,008	b. Investments (Other Than Those That are Deducting Capital)
	1) Penyertaan Modal Sementara dalam Rangka Restrukturisasi Kredit	34,858	52,287	52,287	57,339	-	86,008	1) Temporary Equity Participation in the Framework of Credit Restructuring
	2) Penyertaan kepada Perusahaan Keuangan yang Tidak Terdaftar di Bursa	-	-	-	-	-	-	2) Participation in Financial Companies That are Not Listed on the Stock Exchange
	3) Penyertaan kepada Perusahaan Keuangan yang Terdaftar di Bursa	-	-	-	-	-	-	3) Participation in Financial Companies Listed on the Stock Exchange
	c. Aset Tetap dan Inventaris Neto	508,119	508,119	508,119	559,673	559,673	559,673	c. Fixed Assets and Net Inventory
	d. Agunan yang Diambil Alih (AYDA)	1,154,057	1,731,085	1,731,085	1,367,712	2,051,568	2,051,568	d. Foreclosed Collateral (AYDA)
	e. Antar Kantor Neto	-	-	-	-	-	-	e. Inter Office Net
	f. Lainnya	62,333	62,333	62,333	80,155	80,155	80,155	f. Others
	<b>Total</b>	<b>23,029,594</b>	<b>14,783,306</b>	<b>15,784,160</b>	<b>23,803,494</b>	<b>14,791,529</b>	<b>16,104,803</b>	<b>Total</b>

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
**Table of Calculation of RWA of Credit Risks by Standardized Approach**

**Tabel Pengungkapan Eksposur Kewajiban/Kontinjensi pada Transaksi Rekening Administratif - kecuali Eksposur Sekuritisasi - Bank secara Individual**  
**Table of Disclosures of Contingencies/Commitment Liability Exposures on Administrative Account Transactions, except Securitization Exposures - Bank, Individually**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1	Tagihan kepada Pemerintah	-	-	-	-	-	-	Receivables from Government
	a. Tagihan kepada Pemerintah Indonesia	-	-	-	-	-	-	A. Claims on the Government of Indonesia
	b. Tagihan kepada Pemerintah Negara Lain	-	-	-	-	-	-	B. Claims on Other Countries
2	Tagihan kepada Entitas Sektor Publik	130,000	65,000	65,000	-	-	-	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	2,523	1,262	1,262	1,761	880	880	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	735	367	367	1,268	634	634	Receivables from Banks
	a. Tagihan Jangka Pendek	-	-	-	-	-	-	A. Short Term Claims
	b. Tagihan Jangka Panjang	735	367	367	1,268	634	634	B. Long Term Claims
5	Kredit Beragun Rumah Tinggal	-	-	-	-	-	-	Residential Property Collateralized Loans
6	Kredit Beragun Properti Komersial	21,568	21,568	21,568	23,600	23,600	23,600	Commercial Property Collateralized Loans
7	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	Employee/Retirement Loans
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portfolio Ritel	3,783	2,837	2,837	4,258	3,194	3,194	Receivables from Microbusiness, Small Business, and Retail Portfolio
9	Tagihan kepada Korporasi	458,928	458,928	454,089	470,310	470,310	464,086	Receivables from Corporations
10	Tagihan yang Telah Jatuh Tempo	-	-	-	-	-	-	Due Receivables
	a. Kredit Beragun Rumah Tinggal	-	-	-	-	-	-	A. Residential Mortgage Backed Loans
	b. Selain Kredit Beragun Rumah Tinggal	-	-	-	-	-	-	B. Apart from Credit Backed by Residential Homes
	<b>Total</b>	<b>617,537</b>	<b>549,962</b>	<b>545,123</b>	<b>501,197</b>	<b>498,618</b>	<b>492,395</b>	<b>Total</b>

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
**Table of Calculation of RWA of Credit Risks by Standardized Approach**

**Tabel Pengungkapan Eksposur Kewajiban Komitmen/Kontinjensi pada Transaksi Rekening Administratif, kecuali Eksposur Sekuritisasi – Bank secara Konsolidasi dengan Entitas Anak**  
**Table of Disclosures of Contingencies/Commitment Liability Exposures on Administrative Account Transactions, except Securitization Exposures – Bank, Consolidated with Subsidiaries**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1	Tagihan kepada Pemerintah	-	-	-	-	-	-	Receivables from Government
	a. Tagihan kepada Pemerintah Indonesia	-	-	-	-	-	-	A. Claims on the Government of Indonesia
	b. Tagihan kepada Pemerintah Negara Lain	-	-	-	-	-	-	B. Claims on Other Country Governments
2	Tagihan kepada Entitas Sektor Publik	130,000	65,000	65,000	-	-	-	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	2,523	1,262	1,262	1,761	880	880	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	735	367	367	1,268	634	634	Receivables from Banks
	a. Tagihan Jangka Pendek	-	-	-	-	-	-	A. Short Term Claims
	b. Tagihan Jangka Panjang	735	367	367	1,268	634	634	B. Long Term Claims
5	Kredit Beragun Rumah Tinggal	4,619	1,155	1,155	2,261	565	565	Residential Property Collateralized Loans
6	Kredit Beragun Properti Komersial	21,568	21,568	21,568	23,600	23,600	23,600	Commercial Property Collateralized Loans
7	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	Employee/Retirement Loans
8	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	3,783	2,837	2,837	4,258	3,194	3,194	Receivables from Microbusiness, Small Business, and Retail Portfolio
9	Tagihan kepada Korporasi	485,242	485,242	480,404	497,958	497,958	491,735	Receivables from Corporations
10	Tagihan yang Telah Jatuh Tempo	3,000	4,500	4,500	1	1	1	Due Receivables
	a. Kredit Beragun Rumah Tinggal	-	-	-	1	1	1	A. Residential Mortgage Backed Loans
	b. Selain Kredit Beragun Rumah Tinggal	3,000	4,500	4,500	-	-	-	B. Apart from Credit Backed by Residential Homes
	<b>Total</b>	<b>651,469</b>	<b>581,931</b>	<b>577,092</b>	<b>531,107</b>	<b>526,832</b>	<b>520,609</b>	<b>Total</b>

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
**Table of Calculation of RWA of Credit Risks by Standardized Approach**

**Tabel Pengungkapan Eksposur yang Menimbulkan Risiko Kredit akibat Kegagalan Pihak Lawan (Counterparty Credit Risk) – Bank secara Individual**  
**Table of Disclosure of Exposure Rising Credit Risk Due to Counterparty Credit Risk – Bank, Individually**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1	Tagihan kepada Pemerintah	690,715	-	-	447,805	-	-	Receivables from Government
	a. Tagihan kepada Pemerintah Indonesia	690,715	-	-	447,805	-	-	a. Claims on the Government of Indonesia
	b. Tagihan kepada Pemerintah Negara Lain	-	-	-	-	-	-	b. Claims on Other Country Governments
2	Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	-	-	-	-	-	-	Receivables from Banks
	a. Tagihan Jangka Pendek	-	-	-	-	-	-	a. Short Term Claims
	b. Tagihan Jangka Panjang	-	-	-	-	-	-	b. Long Term Claims
5	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portfolio Ritel	-	-	-	-	-	-	Receivables from Microbusiness, Small Business, and Retail Portfolio
6	Tagihan kepada Korporasi	-	-	-	-	-	-	Receivables from Corporations
	<b>Total</b>	<b>690,715</b>	<b>-</b>	<b>-</b>	<b>447,805</b>	<b>-</b>	<b>-</b>	<b>Total</b>

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
Table of Calculation of RWA of Credit Risks by Standardized Approach

**Tabel Pengungkapan Eksposeur yang Menimbulkan Risiko Kredit akibat Kegagalan Pihak Lawan (Counterparty Credit Risk) – Bank secara Konsolidasi dengan Entitas Anak**  
Table of Disclosure of Exposure Rising Credit Risk Due to Counterparty Credit Risk – Bank, Consolidated with Subsidiaries

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1	Tagihan kepada Pemerintah	690,715	-	-	447,805	-	-	Receivables from Government
	a. Tagihan kepada Pemerintah Indonesia	690,715	-	-	447,805	-	-	a. Claims on the Government of Indonesia
	b. Tagihan kepada Pemerintah Negara Lain	-	-	-	-	-	-	b. Claims on Other Country Governments
2	Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	Receivables from Public Sector Entities
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	Receivables from Multilateral Development Banks and International Institutions
4	Tagihan kepada Bank	-	-	-	-	-	-	Receivables from Banks
	a. Tagihan Jangka Pendek	-	-	-	-	-	-	a. Short Term Claims
	b. Tagihan Jangka Panjang	-	-	-	-	-	-	b. Long Term Claims
5	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	-	-	-	-	-	-	Receivables from Microbusiness, Small Business, and Retail Portfolio
6	Tagihan kepada Korporasi	-	-	-	-	-	-	Receivables from Corporations
	<b>Total</b>	<b>690,715</b>	<b>-</b>	<b>-</b>	<b>447,805</b>	<b>-</b>	<b>-</b>	<b>Total</b>



**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
Table of Calculation of RWA of Credit Risks by Standardized Approach

**Pengungkapan Eksposur yang Menimbulkan Risiko Kredit akibat Kegagalan Setelmen (Settlement Risk) - Bank secara Individual**  
Disclosure of Exposure Causing Credit Risk Due to Settlement Risk - Bank, Individually

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Nilai Eksposur Exposure Value	Faktor Pengurang Modal Impairment Factor	ATMR RWA	Nilai Eksposur Exposure Value	Faktor Pengurang Modal Impairment Factor	ATMR RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1.	Delivery Versus Payment	-	-	-	-	-	-	Delivery Versus Payment
	a. Beban Modal 8% (5-15 Hari)	-	-	-	-	-	-	a. Capital Charge 8% (5-15 Days)
	b. Beban Modal 50% (16-30 Hari)	-	-	-	-	-	-	b. Capital Charge 50% (16-30 Days)
	c. Beban Modal 75% (31-45 Hari)	-	-	-	-	-	-	c. Capital Charge 75% (31-45 Days)
	d. Beban Modal 100% (Lebih dari 45 Hari)	-	-	-	-	-	-	d. Capital Charge 100% (More than 45 Days)
2.	Non-Delivery Versus Payment	-	-	-	-	-	-	Non-Delivery Versus Payment
	<b>Total</b>	-	-	-	-	-	-	<b>Total</b>

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
Table of Calculation of RWA of Credit Risks by Standardized Approach

**Tabel Pengungkapan Eksposur Sekuritisasi - Bank secara Individual**  
Table of Disclosure of Securitization Exposure - Bank, Individually

(dalam juta Rupiah / in million Rupiah)

No.	Jenis Transaksi	31 Desember 2021 / 31 December 2021		Transaction Category
		Faktor Pengurang Modal Impairment Factor	ATMR RWA	
(1)	(2)	(3)	(4)	(2)
1.	ATMR atas Eksposur Sekuritisasi yang Dihitung dengan Metode External Rating Base Approach (ERBA)	-	-	RWA for Securitization Exposures calculated by the External Rating Base Approach (ERBA) Method
2.	ATMR atas Eksposur Sekuritisasi yang Dihitung dengan Metode Standardized Approach (SA)	-	8,484	RWA for Securitization Exposures Calculated Using the Standardized Approach (SA) Method
3.	Eksposur Sekuritisasi yang Merupakan Faktor Pengurang Modal Inti Utama	-	-	Securitization Exposure, which is a Deduction Factor for Main Core Capital
	<b>Total</b>	-	8,484	<b>Total</b>

No.	Jenis Transaksi	31 Desember 2020 / 31 December 2020		Transaction Category
		Faktor Pengurang Modal Impairment Factor	ATMR RWA	
(1)	(2)	(3)	(4)	(2)
1.	ATMR atas Eksposur Sekuritisasi yang Dihitung dengan Metode <i>External Rating Base Approach</i> (ERBA)	-	-	RWA for Securitization Exposures calculated by the External Rating Base Approach (ERBA) Method
2.	ATMR atas Eksposur Sekuritisasi yang Dihitung dengan Metode <i>Standardized Approach</i> (SA)	-	12,199	RWA for Securitization Exposures Calculated Using the Standardized Approach (SA) Method
3.	Eksposur Sekuritisasi yang Merupakan Faktor Pengurang Modal Inti Utama	-	-	Securitization Exposure, which is a Deduction Factor for Main Core Capital
<b>Total</b>		-	<b>12,199</b>	<b>Total</b>

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
Table of Calculation of RWA of Credit Risks by Standardized Approach

**Tabel Pengungkapan Eksposur Derivatif - Bank secara Individual**  
Table of Disclosure of Derivative Exposure - Bank, Individually

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1.	Tagihan kepada Pemerintah	-	-	-	-	-	-	Receivables from Government
	a. Tagihan kepada Pemerintah Indonesia	-	-	-	-	-	-	a. Claims on the Government of Indonesia
	b. Tagihan kepada Pemerintah Negara Lain	-	-	-	-	-	-	b. Claims on Other Country Governments
2.	Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	-	-	-	-	-	-	Receivables from Banks
	a. Tagihan Jangka Pendek	-	-	-	-	-	-	a. Short Term Claims
	b. Tagihan Jangka Panjang	-	-	-	-	-	-	b. Long Term Claims

No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
5.	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portfolio Ritel	-	-	-	-	-	-	Receivables from Microbusiness, Small Business, and Retail Portfolio
6.	Tagihan kepada Korporasi	-	-	-	-	-	-	Receivables from Corporations
7.	Eksposur Tertimbang dari Credit Valuation Adjustment (CVA Risk Weighted Assets)	-	-	-	-	-	-	Weighted Exposure from Credit Valuation Adjustments (CVA Risk Weighted Assets)
	<b>Total</b>	-	-	-	-	-	-	<b>Total</b>

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
Table of Calculation of RWA of Credit Risks by Standardized Approach

**Pengungkapan Eksposur yang Menimbulkan Risiko Kredit akibat Kegagalan Setelmen (Settlement Risk) - Bank secara Konsolidasi dengan Entitas Anak**  
Disclosure of Exposure Causing Credit Risk Due to Settlement Risk - Bank, Consolidated with Subsidiaries

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Nilai Eksposur Exposure value	Faktor Pengurang Modal Impairment Factor	ATMR RWA	Nilai Eksposur Exposure value	Faktor Pengurang Modal Impairment Factor	ATMR RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1.	Delivery Versus Paymet	-	-	-	-	-	-	Delivery Versus Paymet
	a. Beban Modal 8% (5-15 Hari)	-	-	-	-	-	-	a. Capital Charge 8% (5-15 Days)
	b. Beban Modal 50% (16-30 Hari)	-	-	-	-	-	-	b. Capital Charge 50% (16-30 Days)
	c. Beban Modal 75% (31-45 Hari)	-	-	-	-	-	-	c. Capital Charge 75% (31-45 Days)
	d. Beban Modal 100% (Lebih dari 45 Hari)	-	-	-	-	-	-	d. Capital Charge 100% (More than 45 Days)
2.	Non-Delivery Versus Payment	-	-	-	-	-	-	Non-Delivery Versus Payment
	<b>Total</b>	-	-	-	-	-	-	<b>Total</b>

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
**Table of Calculation of RWA of Credit Risks by Standardized Approach**

**Tabel Pengungkapan Eksposur Sekuritisasi - Bank secara Konsolidasi dengan Entitas Anak**  
**Table of Disclosure of Securitization Exposure - Bank, Consolidated with Subsidiaries**

(dalam juta Rupiah / in million Rupiah)

No.	Jenis Transaksi	31 Desember 2021 / 31 December 2021		Transaction Category
		Faktor Pengurang Modal Impairment Factor	ATMR RWA	
(1)	(2)	(3)	(4)	(2)
1.	ATMR atas Eksposur Sekuritisasi yang Dihitung dengan Metode <i>External Rating Base Approach</i> (ERBA)	-	-	RWA for Securitization Exposures calculated by the External Rating Base Approach (ERBA) Method
2.	ATMR atas Eksposur Sekuritisasi yang Dihitung dengan Metode <i>Standardized Approach</i> (SA)	-	8,484	RWA for Securitization Exposures Calculated Using the Standardized Approach (SA) Method
3.	Eksposur Sekuritisasi yang Merupakan Faktor Pengurang Modal Inti Utama	-	-	Securitization Exposure, which is a Deduction Factor for Main Core Capital
	<b>Total</b>	-	<b>8,484</b>	<b>Total</b>
31 Desember 2020 / 31 December 2020				
No.	Jenis Transaksi	Faktor Pengurang Modal Impairment Factor	ATMR RWA	Transaction Category
(1)	(2)	(3)	(4)	(2)
1.	ATMR atas Eksposur Sekuritisasi yang Dihitung dengan Metode <i>External Rating Base Approach</i> (ERBA)	-	-	RWA for Securitization Exposures calculated by the External Rating Base Approach (ERBA) Method
2.	ATMR atas Eksposur Sekuritisasi yang Dihitung dengan Metode <i>Standardized Approach</i> (SA)	-	12,199	RWA for Securitization Exposures Calculated Using the Standardized Approach (SA) Method
3.	Eksposur Sekuritisasi yang Merupakan Faktor Pengurang Modal Inti Utama	-	-	Securitization Exposure, which is a Deduction Factor for Main Core Capital
	<b>Total</b>	-	<b>12,199</b>	<b>Total</b>

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
**Table of Calculation of RWA of Credit Risks by Standardized Approach**

**Tabel Pengungkapan Eksposur Derivatif - Bank secara Konsolidasi dengan Entitas Anak**  
**Table of Disclosure of Derivative Exposure – Bank, Consolidated with Subsidiaries**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portfolio	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Portfolio Category
		Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	Tagihan Bersih Net Receivables	ATMR Sebelum MRK Pre-MRK RWA	ATMR Setelah MRK Past-MRK RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1.	Tagihan kepada Pemerintah	-	-	-	-	-	-	Receivables from Government
	a. Tagihan kepada Pemerintah Indonesia	-	-	-	-	-	-	a. Claims on the Government of Indonesia
	b. Tagihan kepada Pemerintah Negara Lain	-	-	-	-	-	-	b. Claims on Other Country Governments
2.	Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	-	-	-	-	-	-	Receivables from Banks
	a. Tagihan Jangka Pendek	-	-	-	-	-	-	a. Short Term Claims
	b. Tagihan Jangka Panjang	-	-	-	-	-	-	b. Long Term Claims
5.	Tagihan kepada Usaha Mikro, Usaha Kecil dan Portfolio Ritel	-	-	-	-	-	-	Receivables from Microbusiness, Small Business, and Retail Portfolio
6.	Tagihan kepada Korporasi	-	-	-	-	-	-	Receivables from Corporations
7.	Eksposur Tertimbang dari Credit Valuation Adjustment (CVA Risk Weighted Assets)	-	-	-	-	-	-	Weighted Exposure from Credit Valuation Adjustments (CVA Risk Weighted Assets)
	<b>Total</b>	-	-	-	-	-	-	<b>Total</b>

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
Table of Calculation of RWA of Credit Risks by Standardized Approach

**Tabel Pengungkapan Total Pengukuran Risiko Kredit - Bank secara Individual**  
Table of Disclosure of Total Credit Risk Measurement - Bank, Individually

(dalam juta Rupiah / in million Rupiah)

	Kategori Portofolio		Portfolio Category
	31 Desember 2021 / 31 December 2021	31 Desember 2020 / 31 December 2020	
(A) TOTAL ATMR RISIKO KREDIT	15,296,537	15,260,762	TOTAL RWA FOR CREDIT RISK
(B) FAKTOR PENGURANG ATMR RISIKO KREDIT: Selisih Lebih Antara Cadangan Umum PPKA Atas Aset Produktif yang Wajib Dihitung dan 1,25% ATMR untuk Risiko Kredit			CREDIT RISK RWA REDUCING FACTORS: The Excess Difference between PPKA's General Reserve for Earning Assets That Must be Calculated and 1.25% RWA for Credit Risk
(C) TOTAL ATMR RISIKO KREDIT (A) - (B)	15,296,537	15,260,762	TOTAL RWA CREDIT RISK (A) - (B)
(D) TOTAL FAKTOR PENGURANG MODAL	-	-	TOTAL IMPAIRMENT FACTOR

**Tabel Perhitungan ATMR Risiko Kredit dengan Menggunakan Pendekatan Standar**  
Table of Calculation of RWA of Credit Risks by Standardized Approach

**Tabel Pengungkapan Total Pengukuran Risiko Kredit - Bank secara Konsolidasi dengan Entitas Anak**  
Table of Disclosure of Total Credit Risk Measurement - Bank, Consolidated with Subsidiaries

(dalam juta Rupiah / in million Rupiah)

	Kategori Portofolio		Portfolio Category
	31 Desember 2021 / 31 December 2021	31 Desember 2020 / 31 December 2020	
(A) TOTAL ATMR RISIKO KREDIT	16,254,890	15,260,762	TOTAL RWA FOR CREDIT RISK
(B) FAKTOR PENGURANG ATMR RISIKO KREDIT: Selisih Lebih Antara Cadangan Umum PPKA Atas Aset Produktif yang Wajib Dihitung dan 1,25% ATMR untuk Risiko Kredit	-	-	CREDIT RISK RWA REDUCING FACTORS: The Excess Difference between PPKA's General Reserve for Earning Assets That Must be Calculated and 1.25% RWA for Credit Risk
(C) TOTAL ATMR RISIKO KREDIT (A) - (B)	16,254,890	15,260,762	TOTAL RWA CREDIT RISK (A) - (B)
(D) TOTAL FAKTOR PENGURANG MODAL	-	-	TOTAL IMPAIRMENT FACTOR

Tabel Pengungkapan Eksposur CCR berdasarkan Kategori Portfolio dan Bobot Risiko (CCR3)  
Table CCR Exposure by Portfolio Category and Risk Weight (CCR3)

(dalam juta Rupiah / in million Rupiah)

No.	Bobot Risiko	31 Desember 2021 / 31 December 2021										Risk Weight
		a	b	c	d	e	f	g	h	i	Portfolio Category	
	Kategori Portfolio	0%	10%	20%	50%	75%	100%	150%	Lainnya Other	Total Tagihan Bersih Total Net Receivables	(2)	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(2)	
1	Indonesia	-	-	-	-	-	-	-	-	-	Indonesia	
2	Tagihan kepada Pemerintah dan Bank Sentral	690,715	-	-	-	-	-	-	-	690,715	Claims against Government and Central Bank	
3	Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	-	-	-	Claims against Public Sector Entities	
4	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	Claims against Multilateral Development Banks and International Institutions	
5	Tagihan kepada Bank Lain	-	-	-	-	-	-	-	-	-	Receivables from Other Banks	
6	Tagihan kepada Perusahaan Sekuritas	-	-	-	-	-	-	-	-	-	Claims on Securities Companies	
7	Tagihan kepada Korporasi	-	-	-	-	-	-	-	-	-	Claims Against Corporations	
8	Tagihan Kepada Usaha Mikro, Usaha Kecil, dan Portfolio Ritel	-	-	-	-	-	-	-	-	-	Claims against MSMEs and Retail Portfolio	
9	Aset Lainnya	-	-	-	-	-	-	-	-	-	Other Assets	
	<b>Total</b>	<b>690,715</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>690,715</b>	<b>Total</b>	



(dalam juta Rupiah / in million Rupiah)

No.	Bobot Risiko	31 Desember 2020 / 31 December 2020										Risk Weight			
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)		(11)	(12)	
	Kategori Portfolio														Portfolio Category
		a	b	c	d	e	f	g	h	i	Total Tagihan Bersih Total Net Receivables				
1	Indonesia	-	-	-	-	-	-	-	-	-	-	-	-	-	Indonesia
2	Tagihan kepada Pemerintah dan Bank Sentral	447,805	-	-	-	-	-	-	-	-	447,805	-	-	-	Claims against Government and Central Bank
3	Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	-	-	-	-	-	-	-	Claims against Public Sector Entities
4	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	-	-	-	-	Claims against Multilateral Development Banks and International Institutions
5	Tagihan kepada Bank Lain	-	-	-	-	-	-	-	-	-	-	-	-	-	Receivables from Other Banks
6	Tagihan kepada Perusahaan Sekuritas	-	-	-	-	-	-	-	-	-	-	-	-	-	Claims on Securities Companies
7	Tagihan kepada Korporasi	-	-	-	-	-	-	-	-	-	-	-	-	-	Claims Against Corporations
8	Tagihan Kepada Usaha Mikro, Usaha Kecil, dan Portfolio Ritel	-	-	-	-	-	-	-	-	-	-	-	-	-	Claims against MSMEs and Retail Portfolio
9	Aset Lainnya	-	-	-	-	-	-	-	-	-	-	-	-	-	Other Assets
	<b>Total</b>	<b>447,805</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>447,805</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>Total</b>

**Tabel Eksposeur Sekuritisasi pada Banking Book (Tabel SEC1)**  
Disclosure of Security Exposures in the Banking Book (Tabel SEC1)

(dalam juta Rupiah / in million Rupiah)

No.	31 Desember 2021 / 31 December 2021											
	Bank sebagai Originator Bank as Originator			Bank sebagai Sponsor Bank as Sponsor			Bank sebagai Investor Bank as Investor			Sub-Total	Sub-Total	
	a	b	c	d	e	f	g	h	i			
(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)				
1	Retail (Total) –Antara Lain Retail (Total) - Among Others	-	-	-	-	-	37,007	-	-	37,007	-	-
	a. Kredit Perumahan Housing Loans	-	-	-	-	-	37,007	-	-	37,007	-	-
	b. Kartu Kredit Credit Cards	-	-	-	-	-	-	-	-	-	-	-
	c. Eksposeur Ritel Lainnya Other Retail Exposures	-	-	-	-	-	-	-	-	-	-	-
	d. Re-Sekuritisasi Re-Securitization	-	-	-	-	-	-	-	-	-	-	-
2	Non-Retail (Total) – Antara Lain Non-Retail (Total) - Among Others	-	-	-	-	-	-	-	-	5,412	-	5,412
	a. Kredit Korporasi Corporate Loans	-	-	-	-	-	-	-	-	5,412	-	5,412
	b. Kredit Komersil Commercial Credit	-	-	-	-	-	-	-	-	-	-	-
	c. Sewa dan Piutang Rent and Accounts Receivable	-	-	-	-	-	-	-	-	-	-	-
	d. Non-Retail Lainnya Other Non-Retail	-	-	-	-	-	-	-	-	-	-	-
	e. Re-Sekuritisasi Re-Securitization	-	-	-	-	-	-	-	-	-	-	-

**Analisis Kualitatif / Qualitative Analysis**

**Dalam upaya mendiversifikasi risiko likuiditas (Liquidity Facility) dan return, Bank Victoria melakukan investasi pada pihak ketiga (produk EBA) yang mempunyai peringkat investasi grade AAA s.d AA-.**  
In an effort to diversify liquidity risk (Liquidity Facility) and return, Bank Victoria invests in third parties (ABS products) with investment grade ratings of AAA to AA-.

(dalam juta Rupiah / in million Rupiah)

No.	31 Desember 2020 / 31 December 2020										
	Bank sebagai Originator Bank as Originator			Bank sebagai Sponsor Bank as Sponsor			Bank sebagai Investor Bank as Investor				
	a	b	c	d	e	f	g	h	i		
	Traditional	Sintetis Synthetic	Sub-Total	Traditional	Sintetis Synthetic	Sub-Total	Traditional	Sintetis Synthetic	Sub-Total		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	
1	Retail (Total) –Antara Lain Retail (Total) - Among Others	-	-	-	-	-	-	48,855	-	48,855	
	a. Kredit Perumahan Housing Loans	-	-	-	-	-	-	48,855	-	48,855	
	b. Kartu Kredit Credit Cards	-	-	-	-	-	-	-	-	-	
	c. Eksposur Ritel Lainnya Other Retail Exposures	-	-	-	-	-	-	-	-	-	
	d. Re-Sekuritisasi Re-Securitization	-	-	-	-	-	-	-	-	-	
2	Non-Retail (Total) – Antara Lain Non-Retail (Total) - Among Others	-	-	-	-	-	-	12,139	-	12,139	
	a. Kredit Korporasi Corporate Loans	-	-	-	-	-	-	12,139	-	12,139	
	b. Kredit Komersil Commercial Credit	-	-	-	-	-	-	-	-	-	
	c. Sewa dan Piutang Rent and Accounts Receivable	-	-	-	-	-	-	-	-	-	
	d. Non-Retail Lainnya Other Non-Retail	-	-	-	-	-	-	-	-	-	
	e. Re-Sekuritisasi Re-Securitization	-	-	-	-	-	-	-	-	-	

**Tabel Eksposur Sekuritisasi pada Banking Book dan Persyaratan Modalnya – Bank yang Bertindak sebagai Investor (SEC4)**  
**Table of Securitization Exposure in Banking Book and related to its Capital Requirements – Bank Acting as Investor (SEC4)**

(dalam juta Rupiah / in million Rupiah)

		31 Desember 2021 / 31 December 2021																
No.		Nilai Eksposur (berdasarkan Bobot Risiko) Exposure Value (based on Risk Weight)					Nilai Eksposur (berdasarkan Regulatory Approach) Exposure Value (based on Regulatory Approach)					ATMR (berdasarkan Regulatory Approach) ATMR (based on Regulatory Approach)					Bank sebagai Investor Bank as Investor	
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
		≤20% Bobot Risiko Weighted	>20% s.d. 50% Bobot Risiko Weighted	>50% s.d. 100% Bobot Risiko Weighted	>100% s.d. <1.250% Bobot Risiko Weighted	1,250% Bobot Risiko Weighted	IRB RBA	IRB SFA	SA/SSFA	1,250%	IRB RBA	IRB SFA	SA/SSFA	1,250%	IRB RBA	IRB SFA	SA/SSFA	1,250%
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
1	Total Eksposur Total Exposure	42,419	-	-	-	-	-	-	42,419	-	-	-	8,484	-	-	-	8,484	-
2	Sekuritisasi Tradisional Traditional Securitization	42,419	-	-	-	-	-	-	42,419	-	-	-	8,484	-	-	-	8,484	-
3	Dimana Underlying Sekuritisasi In Which the Underlying Securitization	42,419	-	-	-	-	-	-	42,419	-	-	-	8,484	-	-	-	8,484	-
4	Ritel Retail	37,007	-	-	-	-	-	-	37,007	-	-	-	7,401	-	-	-	7,401	-
5	Non-Ritel Non-Retail	5,412	-	-	-	-	-	-	5,412	-	-	-	1,082	-	-	-	1,082	-
6	Dimana Re-Sekuritisasi In Which Re-Securitization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Senior Senior	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Non-Senior Non-Senior	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



(dalam juta Rupiah / in million Rupiah)

		31 Desember 2020 / 31 December 2020																			
No.	(1)	(2)	Nilai Eksposur (berdasarkan Bobot Risiko) Exposure Value (based on Risk Weight)					Nilai Eksposur (berdasarkan Regulatory Approach) Exposure Value (based on Regulatory Approach)					ATMR (berdasarkan Regulatory Approach) ATMR (based on Regulatory Approach)					Bank sebagai Investor Bank as Investor			
			a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q		
			≤20% Bobot Risiko	>20% s.d. 50% Bobot Risiko	>50% s.d. 100% Bobot Risiko	>100% s.d. <1.250% Bobot Risiko	1.250% Bobot Risiko	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB SFA	
	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)				
1	Total Eksposur Total Exposure	60,994	-	-	-	-	60,994	-	60,994	-	-	12,199	-	-	-	12,199	-				
2	Sekuritisasi Tradisional Traditional Securitization	60,994	-	-	-	-	60,994	-	60,994	-	-	12,199	-	-	-	12,199	-				
3	Dimana Underlying Sekuritisasi In Which the Underlying Securitization	60,994	-	-	-	-	60,994	-	60,994	-	-	12,199	-	-	-	12,199	-				
4	Ritel Retail	48,855	-	-	-	-	48,855	-	48,855	-	-	9,771	-	-	-	9,771	-				
5	Non-Ritel Non-Retail	12,139	-	-	-	-	12,139	-	12,139	-	-	2,428	-	-	-	2,428	-				
6	Dimana Re-Sekuritisasi In Which Re- Securitization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
7	Senior Senior	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
8	Non-Senior Non-Senior	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
9	Sekuritisasi Sintetis Synthetic Securitization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				

		31 Desember 2020 / 31 December 2020																
(1)	(2)	Nilai Eksposur (berdasarkan Bobot Risiko) Exposure Value (based on Risk Weight)					Nilai Eksposur (berdasarkan Regulatory Approach) Exposure Value (based on Regulatory Approach)					ATMR (berdasarkan Regulatory Approach) ATMR (based on Regulatory Approach)					Bank sebagai Investor Bank as Investor	
		(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
		≤20% Bobot Risiko	>20% s.d. 50% Bobot Risiko	>50% s.d. 100% Bobot Risiko	>100% s.d. <1.250% Bobot Risiko	1,250% Bobot Risiko	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%
10	Dimana Underlying Sekuritisasi In Which the Underlying Securitization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Ritel Ritel	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Non-Ritel Non-Ritel	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Dimana Re-Sekuritisasi In Which Re- Securitization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Senior Senior	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Non-Senior Non-Senior	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

No.



**Tabel Pengungkapan Risiko Pasar**  
Table of Disclosure of Market Risk

**Tabel Pengungkapan Risiko Pasar dengan Menggunakan Metode Standar**  
Table of Disclosure of Market Risk Using Standardized Method

(dalam juta Rupiah / in million Rupiah)

No.	Jenis Risiko	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Type of Risk		
		Individual Individually	Konsolidasi Consolidate		Individual Individually	Konsolidasi Consolidate				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(2)
		Beban Modal Capital Expenses	ATMR RWA	Beban Modal Capital Expenses	ATMR RWA	Beban Modal Capital Expenses	ATMR RWA	Beban Modal Capital Expenses	ATMR RWA	
1	Risiko Suku Bunga									Interest Rate Risk
	a. Risiko Spesifik	26,919	336,483	28,722	359,019	51,841	648,014	53,643	670,543	a. Specific Risk
	b. Risiko Umum	2,745	34,306	4,325	54,058	3,622	45,270	3,622	45,270	b. General Risk
2	Risiko Nilai Tukar	2,087	26,093	2,087	26,093	356	4,452	356	4,452	Exchange Rate Risk
3	Risiko Ekuitas									Equity Risk
4	Risiko Komoditas									Commodity Risk
5	Risiko Option	-	-	-	-	-	-	-	-	Option Risk
	<b>Total</b>	<b>31,751</b>	<b>396,882</b>	<b>35,134</b>	<b>439,170</b>	<b>55,819</b>	<b>697,735</b>	<b>57,621</b>	<b>720,264</b>	<b>Total</b>

**Tabel Pengungkapan Risiko Operasional**  
Table of Disclosure of Operational Risk

**Tabel Pengungkapan Kuantitatif Risiko Operasional – Bank secara Individual**  
Table of Disclosure of Operational Risk Quantitative - Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Pendekatan yang Digunakan	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Approach Used
		Pendapatan Bruto (Rata-Rata 3 Tahun Terakhir) Gross Revenue (Last 3 Years' Average)	Beban Modal Capital Expenses	ATMR RWA	Pendapatan Bruto (Rata-Rata 3 Tahun Terakhir) Gross Revenue (Last 3 Years' Average)	Beban Modal Capital Expenses	ATMR RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1	Pendekatan Indikator Dasar	497,293	74,594	932,424	642,436	96,365	1,204,567	Basic Indicator Approach
	<b>Total</b>	<b>497,293</b>	<b>74,594</b>	<b>932,424</b>	<b>642,436</b>	<b>96,365</b>	<b>1,204,567</b>	<b>Total</b>

**Tabel Pengungkapan Risiko Operasional**  
Table of Disclosure of Operational Risk

**Tabel Pengungkapan Kuantitatif Risiko Operasional – Bank secara Konsolidasi dengan Entitas Anak**  
Table of Disclosure of Operational Risk Quantitative - Bank, Consolidated with Subsidiaries

(dalam juta Rupiah / in million Rupiah)

No.	Pendekatan yang Digunakan	31 Desember 2021 / 31 December 2021			31 Desember 2020 / 31 December 2020			Approach Used
		Pendapatan Bruto (Rata-Rata 3 Tahun Terakhir) Gross Revenue (Last 3 Years' Average)	Beban Modal Capital Expenses	ATMR RWA	Pendapatan Bruto (Rata-Rata 3 Tahun Terakhir) Gross Revenue (Last 3 Years' Average)	Beban Modal Capital Expenses	ATMR RWA	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1	Pendekatan Indikator Dasar	554,473	83,171	1,039,637	695,270	104,290	1,303,631	Basic Indicator Approach
	<b>Total</b>	<b>554,473</b>	<b>83,171</b>	<b>1,039,637</b>	<b>695,270</b>	<b>104,290</b>	<b>1,303,631</b>	<b>Total</b>

## Referensi POJK dan Kriteria ARA

### POJK References and ARA Criteria

Kriteria Criteria	Penjelasan Explanation	Halaman Page
<b>UMUM / GENERAL</b>		
Laporan tahunan disajikan dalam Bahasa Indonesia yang baik dan benar dan dianjurkan menyajikan juga dalam Bahasa Inggris.  The annual report should be presented in good and correct Indonesian, and it was recommended to present it also in English.		√
Laporan tahunan dicetak dengan kualitas yang baik dan menggunakan jenis dan ukuran huruf yang mudah dibaca.  The annual report should be printed in good quality and uses an easy-to-read type and size.		√
Laporan tahunan mencantumkan identitas perusahaan dengan jelas.  The annual report clearly stated the company's identity.	Nama perusahaan dan tahun <i>annual report</i> ditampilkan di: / The company name and year of the annual report should be displayed on:	√
	1. Sampul muka; / Face cover;	√
	2. Samping; / Side;	√
	3. Sampul belakang; dan / Back cover; and	√
	4. Setiap halaman. / Every page.	√
Laporan tahunan ditampilkan di <i>website</i> perusahaan.  The annual report should be available on the company website.		√
<b>KILAS KINERJA / PERFORMANCE HIGHLIGHTS</b>		
Ikhtisar data keuangan penting memuat informasi keuangan yang disajikan dalam bentuk perbandingan selama 3 (tiga) tahun buku atau sejak memulai usahanya jika Emiten atau Perusahaan Publik tersebut menjalankan kegiatan usahanya kurang dari 3 (tiga) tahun.  The summary of important financial data contained financial information presented in the form of a comparison for 3 (three) financial years or since starting its business if the Issuer or Public Company had been running its business activities for less than 3 (three) years.	Informasi memuat antara lain: Information in the annual reports includes the following:	12
	1. Pendapatan/penjualan; / Revenue/sales;	
	2. Laba bruto; / Gross profit;	
	3. Laba (rugi); / Profit (loss);	
	4. Jumlah laba (rugi) yang dapat diatribusikan kepada pemilik entitas induk dan kepentingan non pengendali; / Total profit (loss) attributable to owners of the parent entity and non-controlling interests;	
	5. Total laba (rugi) komprehensif; / Total comprehensive profit (loss);	
	6. Jumlah laba (rugi) komprehensif yang dapat diatribusikan kepada pemilik entitas induk dan kepentingan non Pengendali; / Total comprehensive profit (loss) attributable to owners of the parent entity and non-controlling interests;	
	7. Laba (rugi) per saham; / Earnings (loss) per share;	
	8. Jumlah aset; / Total assets;	
	9. Jumlah liabilitas; / Total liabilities;	
	10. Jumlah ekuitas; / Total equity;	
	11. Rasio laba (rugi) terhadap jumlah aset; / Ratio of profit (loss) to total assets;	
	12. Rasio laba (rugi) terhadap ekuitas; / Ratio of profit (loss) to equity;	
	13. Rasio laba (rugi) terhadap pendapatan/penjualan; / Ratio of profit (loss) to income/sales;	

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	14. Rasio lancar; / Current ratio; 15. Rasio liabilitas terhadap ekuitas; / Ratio of liabilities to equity; 16. Rasio liabilitas terhadap jumlah aset; / Ratio of liabilities to total assets; 17. Rasio KPMM; / CAR ratio; 18. Rasio <i>Return on Asset</i> (ROA); / Ratio of Return on Assets (ROA); 19. Rasio <i>Return on Equity</i> (ROE); / Ratio of Return on Equity (ROE); 20. Aset produktif / Productive Assets; 21. Rasio <i>Non-performing Loans</i> (NPL); / Ratio of Non-performing Loans (NPL); 22. Rasio Beban Operasional terhadap Pendapatan Operasional (BOPO); / Ratio of Operating Expenses to Operating Income (BOPO); 23. <i>Cost to Income Ratio</i> (CIR); / Cost to Income Ratio (CIR); 24. Rasio <i>Net Interest Margin</i> (NIM); / Net Interest Margin Ratio (NIM); 25. Persentase pelanggaran dan pelampauan Batas Maksimum Pemberian Kredit (BMPK); / Percentage of violations and exceeding the Maximum Lending Limit (BMPK); 26. Rasio Giro Wajib Minimum (GWM); / Statutory Reserves Ratio (GWM); 27. Rasio Posisi Devisa Neto (PDN); dan / Ratio of Net Open Position (GDP); and 28. Informasi dan rasio keuangan lainnya yang relevan dengan emiten atau perusahaan publik dan jenis industrinya. / Information and other financial ratios relevant to the issuer or public company and the type of industry.	
Informasi Saham Stock Price Information	Informasi saham bagi Perusahaan Terbuka paling sedikit memuat: / Share information for a Public Company should at least contain:  1. Saham yang telah diterbitkan untuk setiap masa triwulan yang disajikan dalam bentuk perbandingan selama 2 (dua) tahun buku terakhir, paling sedikit memuat: / Shares issued for each quarterly period were presented in the form of a comparison for the last 2 (two) financial years, at least containing: a. Jumlah saham yang beredar; / Number of outstanding shares; b. Kapitalisasi pasar berdasarkan harga pada bursa efek tempat saham dicatatkan; / Market capitalization based on the price on the stock exchange where the shares were listed; c. Harga saham tertinggi, terendah, dan penutupan berdasarkan harga pada bursa efek tempat saham dicatatkan; dan / The highest, lowest and closing share prices were based on prices on the stock exchange where the shares are listed; and d. <i>Volume</i> perdagangan pada bursa efek tempat saham dicatatkan. / Trading volume on the stock exchange where the shares are listed.  Informasi dalam huruf b), huruf c) dan huruf d) hanya diungkapkan jika sahamnya tercatat di bursa efek; / Information in letter b), letter c) and letter d) is only disclosed if the shares are listed on the stock exchange;	18

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	<p>2. Dalam hal terjadi aksi korporasi yang menyebabkan terjadinya perubahan pada saham, seperti pemecahan saham (<i>stock split</i>), penggabungan saham (<i>reverse stock</i>), dividen saham, saham bonus, perubahan nilai nominal saham, penerbitan efek konversi, serta penambahan dan pengurangan modal, informasi saham sebagaimana dimaksud pada angka 1) ditambahkan penjelasan paling sedikit mengenai: / In the event of a corporate action causing changes in shares, such as stock splits, reverse stock, stock dividends, bonus shares, changes in the nominal value of shares, issuance of conversion securities, as well as capital additions and deductions, stock information as referred to in number 1) should be added with at least an explanation regarding:</p> <p>a. Tanggal pelaksanaan aksi korporasi; / The date of implementation of the corporate action;</p> <p>b. Rasio pemecahan saham (<i>stock split</i>), penggabungan saham (<i>reverse stock</i>), dividen saham, saham bonus, jumlah efek konversi yang diterbitkan, dan perubahan nilai nominal saham; / The ratio of stock splits, reverse stock, stock dividends, bonus shares, the number of convertible securities issued, and changes in the nominal value of shares;</p> <p>c. Jumlah saham beredar sebelum dan sesudah aksi korporasi; / Number of outstanding shares before and after the corporate action;</p> <p>d. Jumlah efek konversi yang dilaksanakan (jika ada); dan / Number of conversion effects executed (if any); and</p> <p>e. Harga saham sebelum dan sesudah aksi korporasi; / Share prices before and after corporate actions;</p> <p>3. Dalam hal terjadi penghentian sementara perdagangan saham (<i>suspension</i>) dan/ atau pembatalan pencatatan saham (<i>delisting</i>) dalam tahun buku, dijelaskan alasan penghentian sementara perdagangan saham (<i>suspension</i>) dan/ atau pembatalan pencatatan saham (<i>delisting</i>) tersebut; dan / In the event of a temporary suspension of share trading (<i>suspension</i>) and/or delisting of shares in the financial year, the should be explained; and</p> <p>4. Dalam hal penghentian sementara perdagangan saham (<i>suspension</i>) sebagaimana dimaksud pada angka 3) dan/ atau proses pembatalan pencatatan saham (<i>delisting</i>) masih berlangsung hingga akhir periode Laporan Tahunan, dijelaskan tindakan yang dilakukan untuk menyelesaikan penghentian sementara perdagangan saham (<i>suspension</i>) dan/ atau pembatalan pencatatan saham (<i>delisting</i>) tersebut. / In the event that the temporary suspension of share trading as referred to in number 3) and/or the delisting process was still ongoing until the end of the Annual Report period, it explained the actions taken to resolve the temporary suspension of share trading and/ or cancellation of the share listing (<i>delisting</i>).</p>	
<p>Informasi mengenai obligasi, sukuk atau obligasi konversi yang masih beredar dalam 2 (dua) tahun buku terakhir. Information on bonds, sukuk or convertible bonds that were still outstanding in the last 2 (two) financial years. Reports of the Directors and the Board of Commissioners</p>	<p>Informasi memuat: / Information contained:</p> <p>1. Jumlah obligasi/sukuk/obligasi konversi yang beredar (<i>outstanding</i>); / Number of outstanding bonds/sukuk/convertible bonds;</p> <p>2. Tingkat bunga/imbalance; / Interest rate/yield;</p> <p>3. Tanggal jatuh tempo; dan / Due date; and</p> <p>4. Peringkat obligasi/sukuk tahun 2020 dan 2021. / Bond/sukuk ratings for 2020 and 2021.</p> <p><b>Catatan:</b> apabila perusahaan tidak memiliki obligasi/sukuk/ obligasi konversi, agar diungkapkan. <b>Note:</b> if the company did not have bonds/sukuk/convertible bonds, it had to be disclosed.</p>	<p>21</p>

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<b>LAPORAN DIREKSI DAN DEWAN KOMISARIS / REPORTS OF THE DIRECTORS AND THE BOARD OF COMMISSIONERS</b>		
Laporan Direksi Directors' Report	<p>Laporan Direksi paling sedikit memuat uraian singkat mengenai: / The Directors' report should at least contain a brief description of:</p> <ol style="list-style-type: none"> <li>1. Kinerja Emiten atau Perusahaan Publik, paling sedikit memuat: / Performance of Issuers or Public Companies, at least containing: <ol style="list-style-type: none"> <li>a. Strategi dan kebijakan strategis Emiten atau Perusahaan Publik; / Issuer's or Public Company's strategy and strategic policies;</li> <li>b. Peranan Direksi dalam perumusan strategi dan kebijakan strategis Emiten atau Perusahaan Publik; The role of the Directors in formulating strategies and strategic policies of Issuers or Public Companies;</li> <li>c. Proses yang dilakukan Direksi untuk memastikan implementasi strategi Emiten atau Perusahaan Publik; / The process carried out by the Directors to ensure the implementation of the Issuer's or Public Company's strategy;</li> <li>d. Perbandingan antara hasil yang dicapai dengan yang ditargetkan Emiten atau Perusahaan Publik; dan Comparison between the results achieved with those targeted by the Issuer or Public Company; and</li> <li>e. Kendala yang dihadapi Emiten atau Perusahaan Publik; / Constraints faced by Issuers or Public Companies;</li> <li>f. Struktur organisasi; / Organizational structure;</li> <li>g. Aktivitas utama; / Main activity;</li> <li>h. Teknologi informasi; / Information Technology;</li> <li>i. Jenis produk dan jasa yang ditawarkan, termasuk penyaluran kredit kepada debitur usaha mikro, kecil, dan menengah; / Types of products and services offered, including lending to micro, small and medium business debtors;</li> <li>j. Tingkat suku bunga penghimpunan dan penyediaan dana; / Interest rates for raising and providing funds;</li> <li>k. Perkembangan perekonomian dan target pasar; Economic development and target market;</li> <li>l. Jaringan kerja dan mitra usaha di dalam dan/atau di luar negeri; / Network and business partners at home and/or abroad;</li> <li>m. Jumlah, jenis, dan lokasi kantor; Number, type and location of offices;</li> <li>n. Kepemilikan Direksi, Dewan Komisaris, dan pemegang saham dalam kelompok usaha Bank; Ownership of the Directors, Board of Commissioners and shareholders in the Bank's business group;</li> <li>o. Perubahan-perubahan penting yang terjadi pada Bank dan kelompok usaha Bank dalam tahun yang bersangkutan; Important changes that occurred in the Bank and the Bank's business group in the relevant year;</li> <li>p. Hal-hal penting yang diperkirakan terjadi pada masa mendatang; dan / Important things that are expected to happen in the future; and</li> <li>q. Sumber daya manusia meliputi jumlah, tingkat pendidikan, pelatihan, dan pengembangan sumber daya manusia. / Human resources include the number, level of education, training, and human resource development.</li> </ol> </li> </ol>	42

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	<p>2. Gambaran tentang prospek usaha Emiten atau Perusahaan Publik; dan / Description of the business prospects of the Issuer or Public Company; and</p> <p>3. Penerapan tata kelola Emiten atau Perusahaan Publik. Implementation of the governance of Issuers or Public Companies.</p> <p>4. Perubahan komposisi anggota Direksi (jika ada) dan alasan perubahannya. / Changes in the composition of the members of the Directors (if any) and the reasons for the changes.</p>	
Laporan Dewan Komisaris Board of Commissioners Report	<p>Laporan Dewan Komisaris paling sedikit memuat uraian singkat mengenai: / The report of the Board of Commissioners should at least contain a brief description about:</p> <p>1. Penilaian terhadap kinerja Direksi mengenai pengelolaan Emiten atau Perusahaan Publik, termasuk pengawasan Dewan Komisaris dalam perumusan dan implementasi strategi Emiten atau Perusahaan Publik yang dilakukan oleh Direksi; / Assessment of the performance of the Directors regarding the management of Issuers or Public Companies, including the supervision of the Board of Commissioners in the formulation and implementation of strategies for Issuers or Public Companies carried out by the Directors;</p> <p>2. Pandangan atas prospek usaha Emiten atau Perusahaan Publik yang disusun oleh Direksi; dan / Views on the business prospects of the Issuer or Public Company prepared by the Directors; and</p> <p>3. Pandangan atas penerapan tata kelola Emiten atau Perusahaan Publik. / Views on the implementation of the governance of the Issuer or Public Company.</p> <p>4. Perubahan komposisi Dewan Komisaris (jika ada) dan alasan perubahannya. / Changes in the composition of the Board of Commissioners (if any) and the reasons for the changes.</p>	36
Tanda tangan anggota Direksi dan Dewan Komisaris Signatures of members of the Directors and Board of Commissioners	<p>Memuat hal-hal sebagai berikut: / Contains the following:</p> <p>1. Tanda tangan dituangkan pada lembaran tersendiri; The signature was written on a separate sheet;</p> <p>2. Pernyataan bahwa Dewan Komisaris dan Direksi bertanggung jawab penuh atas kebenaran isi laporan tahunan; / A statement that the Board of Commissioners and the Directors were fully responsible for the correctness of the contents of the annual report;</p> <p>3. Ditandatangani seluruh anggota Dewan Komisaris dan anggota Direksi dengan menyebutkan nama dan jabatannya; dan / Signed by all members of the Board of Commissioners and members of the Directors stating their names and positions; and</p> <p>4. Penjelasan tertulis dalam surat tersendiri dari yang bersangkutan dalam hal terdapat anggota Dewan Komisaris atau anggota Direksi yang tidak menandatangani laporan tahunan, atau penjelasan tertulis dalam surat tersendiri dari anggota yang lain dalam hal tidak terdapat penjelasan tertulis dari yang bersangkutan. / A written explanation in a separate letter from the person concerned in the event that a member of the Board of Commissioners or a member of the Directors did not sign the annual report, or a written explanation in a separate letter from another member in the event that there was no written explanation from the person concerned.</p>	50
<b>PROFIL PERUSAHAAN / COMPANY PROFILE</b>		
Nama dan alamat lengkap perusahaan Company name and full address	<p>Akses terhadap Emiten atau Perusahaan Publik termasuk kantor cabang atau kantor perwakilan yang memungkinkan masyarakat dapat memperoleh informasi mengenai Emiten atau Perusahaan Publik, meliputi: / Access to Issuers or Public Companies including branch offices or representative offices that allowed the public to obtain information about Issuers or Public Companies, including:</p> <p>1. Alamat; / Address;</p> <p>2. Nomor telepon; / Telephone number;</p> <p>3. Alamat surat elektronik; dan / Electronic mail address; and</p> <p>4. Alamat situs web; / Website address;</p>	54



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Nama dan alamat entitas anak dan/atau kantor cabang atau kantor perwakilan (jika ada) Name and address of the subsidiary and/or branch office or representative office (if any)	Memuat informasi antara lain: It contained information including: 1. Nama dan alamat entitas anak; dan Name and address of the subsidiary; and 2. Nama dan alamat kantor cabang/perwakilan. Name and address of branch/representative office. <b>Catatan:</b> apabila perusahaan tidak memiliki entitas anak, kantor cabang, dan kantor perwakilan, agar diungkapkan. <b>Note:</b> if the company did not have a subsidiary, branch office, and representative office, it should be disclosed.	120
Riwayat singkat Emiten atau Perusahaan Publik; Brief history of the Issuer or Public Company;	Mencakup antara lain: tanggal/ tahun pendirian, nama, perubahan nama perusahaan (jika ada), dan tanggal efektif perubahan nama perusahaan. / It included: date/year of establishment, name, change of company name (if any), and effective date of change of company name. <b>Catatan:</b> apabila perusahaan tidak pernah melakukan perubahan nama, agar diungkapkan. <b>Note:</b> if the company had never changed its name, it should be disclosed.	56
Bidang usaha Business fields	Uraian mengenai antara lain: / It described: 1. Kegiatan usaha perusahaan menurut anggaran dasar terakhir; / The company's business activities according to the latest articles of association; 2. Kegiatan usaha yang dijalankan; dan / Business activities carried out; and 3. Produk dan/atau jasa yang dihasilkan. Products and/or services produced.	66
Visi, Misi, dan Budaya Perusahaan Vision, Mission and Corporate Culture	Mencakup: / It included: 1. Visi perusahaan; / Company vision; 2. Misi perusahaan; / Company mission; 3. Keterangan bahwa visi dan misi tersebut telah direviu dan disetujui oleh Direksi/ Dewan Komisaris pada tahun buku; dan / Information that the vision and mission had been reviewed and approved by the Directors/Board of Commissioners for the financial year; and 4. Pernyataan mengenai budaya perusahaan ( <i>corporate culture</i> ) yang dimiliki Perusahaan. / A statement regarding the corporate culture of the Company.	60
Wilayah Operasional Operational Area	Wilayah operasional Emiten atau Perusahaan Publik; wilayah operasional merupakan wilayah atau daerah pelaksanaan kegiatan operasional atau jangkauan dari kegiatan operasional perusahaan. Operational area of Issuer or Public Company; operational area was the area or area for the implementation of operational activities or the range of the company's operational activities.	76
Struktur Organisasi Organizational structure	Struktur organisasi Emiten atau Perusahaan Publik dalam bentuk bagan, paling sedikit sampai dengan struktur 1 (satu) tingkat di bawah Direksi termasuk komite di bawah Direksi (jika ada) dan komite di bawah Dewan Komisaris, disertai dengan nama dan jabatan. / The organizational structure of the Issuer or Public Company in the form of a chart, at least up to the structure of 1 (one) level below the Directors including committees under the Directors (if any) and committees under the Board of Commissioners, accompanied by names and positions.	78
Keanggotaan Asosiasi Association Member	Daftar keanggotaan asosiasi industri baik dalam skala nasional maupun internasional yang berkaitan dengan penerapan keuangan berkelanjutan. / List of industry association memberships both on a national and international scale related to the implementation of sustainable finance.	105

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<p>Profil Direksi Directors Profile</p>	<p>Profil Direksi, paling sedikit memuat: Profile of the Directors, at least contained:</p> <ol style="list-style-type: none"> <li>1. Nama dan jabatan yang sesuai dengan tugas dan tanggung jawab; / Name and position in accordance with the duties and responsibilities;</li> <li>2. Foto terbaru; / Recent photos;</li> <li>3. Usia; / Age;</li> <li>4. Kewarganegaraan; , Citizenship;</li> <li>5. Riwayat pendidikan dan/atau sertifikasi; Educational history and/or certification;</li> <li>6. Riwayat jabatan, meliputi informasi: Position history, including information on:               <ol style="list-style-type: none"> <li>a. Dasar hukum pengangkatan sebagai anggota Direksi pada Emiten atau Perusahaan Publik yang bersangkutan; / The legal basis for appointment as a member of the Directors of the Issuer or Public Company concerned;</li> <li>b. Rangkap jabatan, baik sebagai anggota Direksi, anggota Dewan Komisaris, dan/atau anggota komite serta jabatan lainnya baik di dalam maupun di luar Emiten atau Perusahaan Publik. Dalam hal anggota Direksi tidak memiliki rangkap jabatan, maka diungkapkan mengenai hal tersebut; dan / Concurrent positions, either as a member of the Directors, member of the Board of Commissioners, and/or committee member as well as other positions both inside and outside the Issuer or Public Company. In the event that a member of the Directors does not have concurrent positions, then this was disclosed; and</li> <li>c. Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; / Work experience and period of time both inside and outside the Issuer or Public Company;</li> </ol> </li> <li>7. Hubungan afiliasi dengan anggota Direksi lainnya, anggota Dewan Komisaris, pemegang saham utama, dan pengendali baik langsung maupun tidak langsung sampai kepada pemilik individu, meliputi nama pihak yang terafiliasi. Dalam hal anggota Direksi tidak memiliki hubungan afiliasi, maka Emiten atau Perusahaan Publik mengungkapkan hal tersebut; dan / Affiliation with other members of the Directors, members of the Board of Commissioners, major shareholders, and controllers either directly or indirectly to individual owners, including names of affiliated parties. In the event that a member of the Directors had no affiliation, the Issuer or Public Company should disclose this matter; and</li> <li>8. Perubahan komposisi anggota Direksi dan alasan perubahannya. Dalam hal tidak terdapat perubahan komposisi anggota Direksi, maka diungkapkan mengenai hal tersebut; / Changes in the composition of the members of the Directors and the reasons for the changes. In the event that there was no change in the composition of the members of the Directors, this matter should be disclosed;</li> </ol>	<p>83</p>

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<p>Profil Dewan Komisaris Board of Commissioners Profile</p>	<p>Profil Dewan Komisaris, paling sedikit memuat: Profile of the Board of Commissioners, at least contained:</p> <ol style="list-style-type: none"> <li>1. Nama dan jabatan; / Name and position;</li> <li>2. Foto terbaru; / Recent photos;</li> <li>3. Usia; / Age;</li> <li>4. Kewarganegaraan; / Citizenship;</li> <li>5. Riwayat pendidikan dan/atau sertifikasi; Educational history and/or certification;</li> <li>6. Riwayat jabatan, meliputi informasi: Position history, including information on: <ol style="list-style-type: none"> <li>a. Dasar hukum pengangkatan sebagai anggota Dewan Komisaris; / Legal basis for appointment as member of the Board of Commissioners;</li> <li>b. Dasar hukum pengangkatan pertama kali sebagai anggota Dewan Komisaris yang merupakan komisaris independen pada Emiten atau Perusahaan Publik yang bersangkutan; / The legal basis for the first appointment as a member of the Board of Commissioners who was an independent commissioner of the Issuer or Public Company concerned;</li> <li>c. Rangkap jabatan, baik sebagai anggota Dewan Komisaris, anggota Direksi, dan/atau anggota komite serta jabatan lainnya baik di dalam maupun di luar Emiten atau Perusahaan Publik. Dalam hal anggota Dewan Komisaris tidak memiliki rangkap jabatan, maka diungkapkan mengenai hal tersebut; Concurrent positions, either as a member of the Board of Commissioners, member of the Directors, and/or committee member as well as other positions both inside and outside the Issuer or Public Company. In the event that a member of the Board of Commissioners did not have concurrent positions, then this should be disclosed;</li> <li>d. Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; / Work experience and period of time both inside and outside the Issuer or Public Company;</li> </ol> </li> <li>7. Hubungan afiliasi dengan anggota Dewan Komisaris lainnya, pemegang saham utama, dan pengendali baik langsung maupun tidak langsung sampai kepada pemilik individu, meliputi nama pihak yang terafiliasi; Dalam hal anggota Dewan Komisaris tidak memiliki hubungan afiliasi, maka Emiten atau Perusahaan Publik mengungkapkan hal tersebut; / Affiliation with other members of the Board of Commissioners, major shareholders, and controllers, either directly or indirectly, to individual owners, including names of affiliated parties; In the event that a member of the Board of Commissioners had no affiliation, the Issuer or Public Company should disclose this matter;</li> <li>8. Pernyataan independensi komisaris independen dalam hal komisaris independen telah menjabat lebih dari 2 (dua) periode; dan / Statement of independence of the independent commissioner in the event that the independent commissioner had served more than 2 (two) terms; and</li> <li>9. Perubahan komposisi anggota Dewan Komisaris dan alasan perubahannya. Dalam hal tidak terdapat perubahan komposisi anggota Dewan Komisaris, maka diungkapkan mengenai hal tersebut; / Changes in the composition of the members of the Board of Commissioners and the reasons for the changes. In the event that there was no change in the composition of the members of the Board of Commissioners, this matter should be disclosed;</li> </ol>	80
<p>Jumlah karyawan dan data pengembangan kompetensi karyawan. Number of employees and data on employee competency development.</p>	<p>Jumlah karyawan menurut jenis kelamin, jabatan, usia, tingkat pendidikan, dan status ketenagakerjaan (tetap/kontrak) dalam tahun buku; / Number of employees by gender, position, age, education level, and employment status (permanent/contracted) in the financial year;</p> <p>Pengungkapan informasi dapat disajikan dalam bentuk tabel. Disclosure of information could be presented in tabular form.</p>	268; 291

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<p>Komposisi pemegang saham Composition of shareholders</p>	<p>Nama pemegang saham dan persentase kepemilikan pada awal dan akhir tahun buku, yang terdiri dari informasi mengenai: / Name of shareholders and percentage of ownership at the beginning and end of the financial year consisted of information regarding:</p> <ol style="list-style-type: none"> <li>1. Pemegang saham yang memiliki 5% (lima persen) atau lebih saham Emiten atau Perusahaan Publik; Shareholders owning 5% (five percent) or more shares of the Issuer or Public Company;</li> <li>2. Anggota Direksi dan anggota Dewan Komisaris yang memiliki saham Emiten atau Perusahaan Publik. Dalam hal seluruh anggota Direksi dan/atau seluruh anggota Dewan Komisaris tidak memiliki saham, maka diungkapkan mengenai hal tersebut; / Members of the Directors and members of the Board of Commissioners owning shares of Issuers or Public Companies. In the event that all members of the Directors and/or all members of the Board of Commissioners did not own shares, then this matter should be disclosed;</li> <li>3. Persentase kepemilikan tidak langsung atas saham Emiten atau Perusahaan Publik oleh anggota Direksi dan anggota Dewan Komisaris pada awal dan akhir tahun buku, termasuk informasi mengenai pemegang saham yang terdaftar dalam daftar pemegang saham untuk kepentingan kepemilikan tidak langsung anggota Direksi dan anggota Dewan Komisaris; / Percentage of indirect ownership of shares of Issuers or Public Companies by members of the Directors and members of the Board of Commissioners at the beginning and end of the financial year, including information on shareholders registered in the shareholder register for the benefit of indirect ownership of members of the Directors and members of the Board of Commissioners;</li> </ol> <p>Dalam hal seluruh anggota Direksi dan/atau seluruh anggota Dewan Komisaris tidak memiliki kepemilikan tidak langsung atas saham Emiten atau Perusahaan Publik, maka diungkapkan mengenai hal tersebut. / In the event that all members of the Directors and/or all members of the Board of Commissioners did not have indirect ownership of the shares of the Issuer or Public Company, this matter should be disclosed.</p> <p>Kelompok pemegang saham masyarakat, yaitu kelompok pemegang saham yang masing-masing memiliki kurang dari 5% (lima persen) saham Emiten atau Perusahaan Publik; Community shareholder group, namely the group of shareholders who each owned less than 5% (five percent) of the shares of the Issuer or Public Company;</p> <ol style="list-style-type: none"> <li>4. Jumlah pemegang saham dan persentase kepemilikan per akhir tahun buku berdasarkan klasifikasi: / Number of shareholders and percentage of ownership at the end of the financial year based on classification: <ol style="list-style-type: none"> <li>a. Kepemilikan institusi lokal; / Ownership of local institutions;</li> <li>b. Kepemilikan institusi asing; / Ownership of foreign institutions;</li> <li>c. Kepemilikan individu lokal; dan / Local individual ownership; and</li> <li>d. Kepemilikan individu asing; / Foreign individual ownership;</li> </ol> </li> </ol> <p>Informasi di atas dapat disajikan dalam bentuk tabel. The above information could be presented in tabular form.</p>	<p>108</p>
<p>Pemegang saham utama dan pengendali Major and controlling shareholders</p>	<p>Informasi mengenai pemegang saham utama dan pengendali Emiten atau Perusahaan Publik, baik langsung maupun tidak langsung, sampai kepada pemilik individu, yang disajikan dalam bentuk skema atau bagan; / Information regarding the main and controlling shareholders of the Issuer or Public Company, either directly or indirectly, to the individual owners presented in the form of a scheme or chart;</p>	<p>107</p>
<p>Daftar entitas anak dan/atau entitas asosiasi List of subsidiaries and/or associated entities</p>	<p>Nama entitas anak, perusahaan asosiasi, perusahaan ventura bersama dimana Emiten atau Perusahaan Publik memiliki pengendalian bersama entitas (jika ada), beserta persentase kepemilikan saham, bidang usaha, total aset, dan status operasi entitas anak, perusahaan asosiasi, perusahaan ventura bersama. The name of the subsidiary, associated company, joint venture company where the Issuer or Public Company had joint control of the entity (if any), along with the percentage of share ownership, line of business, total assets, and operating status of the subsidiary, associated company, joint venture company.</p> <p>Untuk entitas anak, ditambahkan informasi mengenai alamat entitas anak tersebut. / For a subsidiary, information about the address of the subsidiary was added.</p>	<p>120</p>

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Informasi terkait dengan Kelompok Usaha Bank Information related to the Bank Business Group		120
Struktur grup perusahaan Company group structure	Struktur grup perusahaan dalam bentuk bagan yang menggambarkan entitas induk, entitas anak, entitas asosiasi, <i>joint venture</i> , dan <i>special purpose vehicle</i> (SPV). / Company group structure in the form of a chart depicting parent entities, subsidiaries, associates, joint ventures, and special purpose vehicles (SPV).	119
Kronologi pencatatan saham Share listing chronology	Kronologis pencatatan saham, jumlah saham, nilai nominal, dan harga penawaran dari awal pencatatan hingga akhir tahun buku serta nama bursa efek dimana saham Emiten atau Perusahaan Publik dicatatkan, termasuk pemecahan saham ( <i>stock split</i> ), penggabungan saham ( <i>reverse stock</i> ), dividen saham, saham bonus, dan perubahan nilai nominal saham, pelaksanaan efek konversi, pelaksanaan penambahan dan pengurangan modal (jika ada); Chronology of share listing, number of shares, nominal value, and offering price from the beginning of listing to the end of the financial year as well as the name of the stock exchange where the shares of the Issuer or Public Company were listed, including stock splits, reverse stock, stock dividends, bonus shares, and changes in the nominal value of shares, implementation of conversion effects, implementation of capital additions and subtractions (if any);	114
Kronologis penerbitan efek (termasuk <i>private placement</i> ) dan/atau pencatatan saham dari awal penerbitan sampai dengan akhir tahun buku. Chronology of securities issuance (including private placement) and/or share listing from the initial issuance to the end of the financial year.	Informasi pencatatan efek lainnya yang belum jatuh tempo pada tahun buku paling sedikit memuat nama efek, tahun penerbitan, tingkat suku bunga/imbalance hasil, tanggal jatuh tempo, nilai penawaran, dan peringkat efek (jika ada); Other securities listing information that had not matured in the financial year at least included the name of the securities, year of issue, interest rate/yield, maturity date, offering value, and rating of securities (if any);	116
Informasi penggunaan jasa akuntan publik (AP) dan kantor akuntan publik (KAP) Information on the use of public accountants (AP) and public accounting firms (KAP)	Informasi penggunaan jasa akuntan publik (AP) dan kantor akuntan publik (KAP) beserta jaringan/asosiasi/aliansinya meliputi: Information on the use of public accounting services (AP) and public accounting firms (KAP) and their networks/associations/allies included: 1. Nama dan alamat; / Name and address; 2. Periode penugasan; / Assignment period; 3. Informasi jasa audit dan/atau non audit yang diberikan; Information on audit and/or non-audit services provided; 4. Biaya jasa ( <i>fee</i> ) audit dan/atau non audit untuk masing-masing penugasan yang diberikan selama tahun buku; dan / Audit and/or non-audit fees for each assignment given during the financial year; and	126; 471
	5. Dalam hal AP dan KAP beserta jaringan/asosiasi/aliansinya, yang ditunjuk tidak memberikan jasa non audit, maka diungkapkan mengenai informasi tersebut. / In the event that AP and KAP and their networks/associations/allies, which are appointed do not provide non-audit services, then the information is disclosed. Pengungkapan informasi penggunaan jasa AP dan KAP beserta jaringan/asosiasi/aliansinya dapat disajikan dalam bentuk tabel. Disclosure of information on the use of AP and KAP services and their networks/associations/allies could be presented in tabular form.	471
Nama dan alamat lembaga dan/atau profesi penunjang Name and address of supporting institutions and/or professions	Nama dan alamat lembaga dan/atau profesi penunjang pasar modal selain AP dan KAP. / Name and address of capital market supporting institutions and/or professions other than AP and KAP.	124
Penghargaan yang diterima dalam tahun buku terakhir dan/atau sertifikasi yang masih berlaku dalam tahun buku terakhir baik yang berskala nasional maupun internasional Awards received in the last financial year and/or certifications that are still valid in the last financial year both on a national and international scale	Informasi memuat antara lain: It contained information in the following: 1. Nama penghargaan dan/atau sertifikasi; Name of award and/or certification; 2. Tahun perolehan penghargaan dan/atau sertifikasi; Year of award and/or certification; 3. Badan pemberi penghargaan dan/atau sertifikasi; dan The awarding and/or certification body; and 4. Masa berlaku (untuk sertifikasi). / Validity period (for certification).	27

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Informasi pada Website Perusahaan Information on Company Website	Meliputi paling kurang: / It included at least: <ol style="list-style-type: none"> <li>Informasi pemegang saham sampai dengan pemilik akhir individu; Shareholder information up to the individual ultimate owner;</li> <li>Isi Kode Etik; / Fill in the Code of Ethics;</li> <li>Informasi Rapat Umum Pemegang Saham (RUPS) paling kurang meliputi bahan mata acara yang dibahas dalam RUPS, ringkasan risalah RUPS, dan informasi tanggal penting yaitu tanggal pengumuman RUPS, tanggal pemanggilan RUPS, tanggal RUPS, tanggal ringkasan risalah RUPS diumumkan; / Information on the General Meeting of Shareholders (GMS) at least includes material on the agenda discussed in the GMS, a summary of the minutes of the GMS, and information on important dates, namely the date of the announcement of the GMS, the date of the invitation to the GMS, the date of the GMS, the date of the summary of the minutes of the GMS being announced;</li> <li>Laporan keuangan tahunan terpisah (5 tahun terakhir); Separate annual financial statements (last 5 years);</li> <li>Profil Dewan Komisaris dan Direksi; dan / Profile of the Board of Commissioners and Directors; and</li> <li>Piagam/Charter Dewan Komisaris, Direksi, Komite Komite, dan Unit Audit Internal. / Charter of the Board of Commissioners, Directors, Committees, and Internal Audit Unit.</li> </ol>	129
<b>ANALISA DAN PEMBAHASAN MANAJEMEN ATAS KINERJA PERUSAHAAN</b> <b>MANAGEMENT DISCUSSION AND ANALYSIS ON COMPANY PERFORMANCE</b>		
Tinjauan operasi per segmen usaha Operational review by business segment	Tinjauan operasi per segmen usaha sesuai dengan jenis industri Emiten atau Perusahaan Publik, paling sedikit mengenai: Operational review per business segment according to the type of industry of the Issuer or Public Company, at least regarding: <ol style="list-style-type: none"> <li>Penjelasan masing-masing segmen usaha. Explanation of each business segment.</li> <li>Kinerja per segmen usaha, antara lain: Performance per business segment, including: <ol style="list-style-type: none"> <li>Produksi, yang meliputi proses, kapasitas, dan perkembangannya; / Production, which includes the process, capacity, and development;</li> <li>Peningkatan/penurunan kapasitas produksi; Increase/decrease in production capacity;</li> <li>Penjualan/pendapatan usaha; dan Sales/operating income; and</li> <li>Profitabilitas / Profitability</li> </ol> </li> </ol>	183
Uraian atas kinerja keuangan perusahaan Description of the company's financial performance	Analisis kinerja keuangan yang mencakup perbandingan antara kinerja keuangan tahun yang bersangkutan dengan tahun sebelumnya dan penyebab kenaikan/penurunan suatu akun (dalam bentuk narasi dan tabel), antara lain mengenai: Financial performance analysis which included a comparison between the financial performance of the year concerned with the previous year and the causes of an increase/decrease in an account (in the form of narratives and tables), including regarding: <ol style="list-style-type: none"> <li>Aset lancar, aset tidak lancar, dan total aset; Current assets, non-current assets, and total assets;</li> <li>Liabilitas jangka pendek, liabilitas jangka panjang dan total liabilitas; / Short-term liabilities, long-term liabilities and total liabilities;</li> <li>Ekuitas; / Equity;</li> <li>Penjualan/pendapatan usaha, beban, laba (rugi), penghasilan komprehensif lain, dan penghasilan komprehensif periode berjalan; / Sales/operating income, expenses, profit (loss), other comprehensive income, and comprehensive income for the current period;</li> <li>Arus kas; / Cash flow;</li> <li>Suku bunga dasar kredit; / Basic loan interest rate;</li> <li>Analisis kualitas aset produktif dan rasio keuangan yang relevan. / Analysis of the quality of earning assets and relevant financial ratios.</li> </ol>	205

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<p>Bahasan dan analisis tentang kemampuan membayar utang dan tingkat kolektibilitas piutang perusahaan, dengan menyajikan perhitungan rasio yang relevan sesuai dengan jenis industri perusahaan</p> <p>Discussion and analysis of abilities to pay debts and the collectibility level of the company's receivables, by presenting the relevant ratio calculations according to the type of company industry</p>	<p>Penjelasan tentang: / Explanation of:</p> <ol style="list-style-type: none"> <li>1. Kemampuan membayar hutang, baik jangka pendek maupun jangka panjang dan / Ability to pay debts, both short term and long term and</li> <li>2. Tingkat kolektibilitas piutang. The level of collectibility of receivables.</li> </ol>	219
<p>Bahasan tentang struktur modal (capital structure) dan kebijakan manajemen atas struktur modal (capital structure policy)</p> <p>Discussion on capital structure and management of capital structure policy</p>	<p>Penjelasan atas: / The explanation consisted of:</p> <ol style="list-style-type: none"> <li>1. Rincian struktur modal (<i>capital structure</i>) yang terdiri dari utang berbasis bunga/ sukuk dan ekuitas; dan / Details of the capital structure consisting of interest-based debt/sukuk and equity; and</li> <li>2. Kebijakan manajemen atas struktur modal (<i>capital structure policies</i>); dan / Management policies on capital structure (<i>capital structure policies</i>); and</li> <li>3. Dasar pemilihan kebijakan manajemen Basis for selecting management policy</li> </ol>	222
<p>Bahasan mengenai ikatan yang material untuk investasi barang modal (bukan ikatan pendanaan) pada tahun buku terakhir</p> <p>Discussion on material commitments for capital goods investment (not funding commitments) in the last financial year</p>	<p>Penjelasan tentang: / It explained:</p> <ol style="list-style-type: none"> <li>1. Nama pihak yang melakukan ikatan; The name of the party making the bond;</li> <li>2. Tujuan dari ikatan tersebut; / The purpose of the bond;</li> <li>3. Sumber dana yang diharapkan untuk memenuhi ikatan-ikatan tersebut; / The expected source of funds to fulfill these commitments;</li> <li>4. Mata uang yang menjadi denominasi; dan Currency to be denominated; and</li> <li>5. Langkah-langkah yang direncanakan perusahaan untuk melindungi risiko dari posisi mata uang asing yang terkait. Measures planned by the company to protect the risk from the related foreign currency position.</li> </ol> <p><b>Catatan:</b> apabila perusahaan tidak mempunyai ikatan terkait investasi barang modal pada tahun buku terakhir agar diungkapkan. <b>Note:</b> if the company did not have a commitment related to investment in capital goods in the last financial year, it should be disclosed.</p>	224
<p>Bahasan mengenai investasi barang modal yang direalisasikan pada tahun buku terakhir</p> <p>Discussion on investment in capital goods realized in the last financial year</p>	<p>Penjelasan tentang: / It explained:</p> <ol style="list-style-type: none"> <li>1. Jenis investasi barang modal; Types of investment in capital goods;</li> <li>2. Tujuan investasi barang modal; dan The purpose of investment in capital goods; and</li> <li>3. Nilai investasi barang modal yang dikeluarkan pada tahun buku terakhir. / The investment value of capital goods issued in the last financial year.</li> </ol> <p><b>Catatan:</b> apabila tidak terdapat realisasi investasi barang modal, agar diungkapkan. <b>Note:</b> if there was no realization of capital goods investment, it should be disclosed.</p>	224



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<p>Informasi perbandingan antara target pada awal tahun buku dengan hasil yang dicapai (realisasi), dan target atau proyeksi yang ingin dicapai untuk satu tahun mendatang. Comparison information between the target at the beginning of the financial year with the results achieved (realization), and the targets or projections to be achieved for the coming year.</p>	<p>Perbandingan antara target/proyeksi pada awal tahun buku dengan hasil yang dicapai (realisasi), mengenai: / Comparison between targets/projections at the beginning of the year book with the results achieved (realization), regarding:</p> <ol style="list-style-type: none"> <li>1. Pendapatan/penjualan; / Revenue/sales;</li> <li>2. Laba (rugi); / Profit (loss);</li> <li>3. Struktur modal (<i>capital structure</i>); / Capital structure;</li> <li>4. Pemasaran; / Marketing;</li> <li>5. Pengembangan SDM; / HR Development;</li> <li>6. Hal lainnya yang dianggap penting bagi Emiten atau Perusahaan Publik. / Other matters deemed important to the Issuer or Public Company.</li> </ol>	225
	<p>Target/proyeksi yang ingin dicapai Emiten atau Perusahaan Publik untuk 1 (satu) tahun mendatang, / Targets/projections to be achieved by the Issuer or Public Company for the next 1 (one) year, mengenai: / about:</p> <ol style="list-style-type: none"> <li>1. Pendapatan/penjualan; / Revenue/sales;</li> <li>2. Laba (rugi); / Profit (loss);</li> <li>3. Struktur modal (<i>capital structure</i>); Capital structure (capital structure);</li> <li>4. Kebijakan dividen; / Dividend Policy;</li> <li>5. Pemasaran; / Marketing;</li> <li>6. Pengembangan SDM; / HR Development;</li> <li>7. Hal lainnya yang dianggap penting bagi Emiten atau Perusahaan Publik. / Other matters deemed important to the Issuer or Public Company.</li> </ol>	226
<p>Informasi dan fakta material yang terjadi setelah tanggal laporan akuntan Material information and facts occurring after the date of the accountant's report</p>	<p>Uraian kejadian penting setelah tanggal laporan akuntan termasuk dampaknya terhadap kinerja dan risiko usaha di masa mendatang. Description of significant events after the date of the accountant's report including their impact on future business performance and risks.</p> <p><b>Catatan:</b> apabila tidak ada kejadian penting setelah tanggal laporan akuntan agar diungkapkan. Note: if there was no significant event after the date of the accountant's report, it should be disclosed.</p>	229
<p>Uraian tentang prospek usaha perusahaan Description of the company's business prospects</p>	<p>Prospek usaha dari Emiten atau Perusahaan Publik dikaitkan dengan kondisi industri, ekonomi secara umum dan pasar internasional disertai data pendukung kuantitatif dari sumber data yang layak dipercaya. The business prospects of the Issuer or Public Company are related to industrial conditions, the general economy and the international market accompanied by quantitative supporting data from reliable data sources.</p>	203
<p>Uraian tentang aspek pemasaran Description of the marketing aspect</p>	<p>Aspek pemasaran atas barang dan/atau jasa Emiten atau Perusahaan Publik, paling sedikit mengenai strategi pemasaran dan pangsa pasar. / The marketing aspect of the goods and/or services of the Issuer or Public Company, at least regarding the marketing strategy and market share.</p>	185
<p>Uraian mengenai dividen selama 2 (dua) tahun buku terakhir. Description of dividends for the last 2 (two) financial years.</p>	<p>Uraian mengenai dividen selama 2 (dua) tahun buku terakhir, paling sedikit: / Description of dividends for 2 (two) financial years last, at least:</p> <ol style="list-style-type: none"> <li>1. Kebijakan dividen, antara lain memuat informasi persentase jumlah dividen yang dibagikan terhadap laba bersih; Dividend policy contained information of the percentage of total dividends distributed to net income;</li> <li>2. Tanggal pembayaran dividen kas dan/atau tanggal distribusi dividen non kas; / Date of payment of cash dividends and/or date of distribution of non-cash dividends;</li> <li>3. Jumlah dividen per saham (kas dan/atau non kas); Total dividends per share (cash and/or non-cash);</li> <li>4. Jumlah dividen per tahun yang dibayar. The amount of dividends per year paid.</li> </ol> <p><b>Catatan:</b> apabila tidak ada pembagian dividen, agar diungkapkan alasannya. <b>Note:</b> if there was no dividend distribution, the reasons should be disclosed.</p>	230

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<p>Realisasi penggunaan dana hasil penawaran umum (dalam hal perusahaan masih diwajibkan menyampaikan laporan realisasi penggunaan dana)</p> <p>Realization of the use of proceeds from the public offering (in the event that the company was still required to submit a report on the realization of the use of funds)</p>	<p>Memuat uraian mengenai: / It contained a description of:</p> <ol style="list-style-type: none"> <li>1. Total perolehan dana; / Total proceeds;</li> <li>2. Rencana penggunaan dana; / Plan for the use of funds;</li> <li>3. Rincian penggunaan dana; / Details of the use of funds;</li> <li>4. Saldo dana; dan / Fund balance; and</li> <li>5. Tanggal persetujuan RUPS/RUPO atas perubahan penggunaan dana (jika ada). / The date of approval of the GMS/RUPO for changes in the use of funds (if any).</li> </ol> <p><b>Catatan:</b> apabila tidak memiliki informasi realisasi penggunaan dana hasil penawaran umum, agar diungkapkan. <b>Note:</b> if the company did not have information on the realization of the use of proceeds from the public offering, it should be disclosed.</p>	230
<p>Informasi transaksi material yang mengandung benturan kepentingan dan/ atau transaksi dengan pihak afiliasi</p> <p>Information on material transactions containing conflicts of interest and/or transactions with affiliated parties</p>	<p>Memuat uraian mengenai: / It contained a description of:</p> <ol style="list-style-type: none"> <li>1. Tanggal, nilai, dan objek transaksi; Transaction date, value, and object;</li> <li>2. Nama pihak yang melakukan transaksi; Name of the party conducting the transaction;</li> <li>3. Sifat hubungan afiliasi (jika ada); The nature of the affiliation relationship (if any);</li> <li>4. Penjelasan mengenai kewajaran transaksi; Explanation of the fairness of the transaction;</li> <li>5. Pemenuhan ketentuan terkait; Fulfillment of related provisions;</li> <li>6. Dalam hal terdapat hubungan afiliasi, selain mengungkapkan informasi sebagaimana dimaksud dalam angka 1) sampai dengan angka 5), Emiten atau Perusahaan Publik juga mengungkapkan informasi: / In the event that there was an affiliation relationship, in addition to disclosing the information as referred to in number 1) to number 5), the Issuer or Public Company also disclosed information: <ol style="list-style-type: none"> <li>a. Pernyataan Direksi bahwa transaksi afiliasi telah melalui prosedur yang memadai untuk memastikan bahwa transaksi afiliasi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum antara lain dilakukan dengan memenuhi prinsip transaksi yang wajar (<i>armslength principle</i>); dan / Statement of the Directors that affiliated transactions had gone through adequate procedures to ensure that affiliated transactions were carried out in accordance with generally accepted business practices, among others, by complying with the arms-length principle; and</li> <li>b. Peran Dewan Komisaris dan komite audit dalam melakukan prosedur yang memadai untuk memastikan bahwa transaksi afiliasi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum antara lain dilakukan dengan memenuhi prinsip transaksi yang wajar (<i>armslength principle</i>); / The role of the Board of Commissioners and the audit committee in carrying out adequate procedures to ensure that affiliated transactions were carried out in accordance with generally accepted business practices, among others, is carried out by complying with the arms-length principle;</li> </ol> </li> <li>7. Untuk transaksi afiliasi atau transaksi material yang merupakan kegiatan usaha yang dijalankan dalam rangka menghasilkan pendapatan usaha dan dijalankan secara rutin, berulang, dan/atau berkelanjutan, ditambahkan penjelasan bahwa transaksi afiliasi atau transaksi material tersebut merupakan kegiatan usaha yang dijalankan dalam rangka menghasilkan pendapatan usaha dan dijalankan secara rutin, berulang, dan/atau berkelanjutan; Dalam hal transaksi afiliasi atau transaksi material dimaksud telah diungkapkan dalam laporan keuangan tahunan, ditambahkan informasi mengenai rujukan pengungkapan dalam laporan keuangan tahunan tersebut. / For affiliated transactions or material transactions which became business activities carried out in order to generate business income and are carried out regularly, repeatedly, and/or continuously, an explanation was added that the affiliated transactions or material transactions were business activities carried out in order to generate operating income and run regularly, repeatedly, and/or continuously; In the event that the affiliated transactions or material transactions referred to have been disclosed in the annual financial statements, additional information regarding the disclosure reference in the annual financial statements was added.</li> </ol>	232

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	<p>8. Untuk pengungkapan transaksi afiliasi dan/atau transaksi benturan kepentingan yang merupakan hasil pelaksanaan transaksi afiliasi dan/atau transaksi benturan kepentingan yang telah disetujui pemegang saham independen, ditambahkan informasi mengenai tanggal pelaksanaan RUPS yang menyetujui transaksi afiliasi dan/atau transaksi benturan kepentingan tersebut; / For disclosure of affiliated transactions and/or conflict of interest transactions resulting from the implementation of affiliated transactions and/or conflict of interest transactions that have been approved by independent shareholders, additional information regarding the date of the GMS which approved the affiliated transactions and/or conflict of interest transactions is added;</p> <p>9. Dalam hal tidak terdapat transaksi afiliasi dan/atau transaksi benturan kepentingan, maka diungkapkan mengenai hal tersebut. / In the event that there was no affiliated transaction and/or conflict of interest transaction, this matter should be disclosed.</p>	
<p>Uraian mengenai perubahan peraturan perundang-undangan terhadap perusahaan pada tahun buku terakhir A description of changes in the laws and regulations of the company in the last financial year</p>	<p>Uraian memuat antara lain: / The description included:</p> <ol style="list-style-type: none"> <li>1. Nama peraturan perundang-undangan yang mengalami perubahan; dan / The name of the legislation undergoing changes; and</li> <li>2. Dampaknya (kuantitatif dan/atau kualitatif) terhadap perusahaan (jika signifikan) atau pernyataan bahwa dampaknya tidak signifikan. / The impact (quantitative and/or qualitative) on the company (if significant) or a statement that the impact is not significant.</li> </ol> <p><b>Catatan:</b> apabila tidak terdapat perubahan peraturan perundang-undangan pada tahun buku terakhir, agar diungkapkan. <b>Note:</b> if there were no changes to the laws and regulations in the last financial year, the matters should be disclosed.</p>	240
<p>Uraian mengenai perubahan kebijakan akuntansi yang diterapkan perusahaan pada tahun buku terakhir A description of the changes in accounting policies adopted by the company in the last financial year</p>	<p>Uraian memuat antara lain: / The description included:</p> <ol style="list-style-type: none"> <li>1. Perubahan kebijakan akuntansi; Changes in accounting policies;</li> <li>2. Alasan perubahan kebijakan akuntansi; dan Reasons for changes in accounting policies; and</li> <li>3. Dampaknya secara kuantitatif terhadap laporan keuangan. Quantitative impact on financial statements.</li> </ol> <p><b>Catatan:</b> Apabila tidak terdapat perubahan kebijakan akuntansi pada tahun buku terakhir, agar diungkapkan. <b>Note:</b> If there was no change in accounting policy in the last financial year, it should be disclosed.</p>	256
<p>Informasi kelangsungan usaha Business continuity information</p>	<p>Pengungkapan informasi mengenai: / Disclosure of information regarding:</p> <ol style="list-style-type: none"> <li>1. Hal-hal yang berpotensi berpengaruh signifikan terhadap kelangsungan usaha perusahaan pada tahun buku terakhir; Potential Matters having a significant effect on the company's business continuity in the last financial year;</li> <li>2. <i>Assessment</i> manajemen atas hal-hal pada angka 1; dan Management's assessment of the items in number 1; and</li> <li>3. Asumsi yang digunakan manajemen dalam melakukan <i>assessment</i>. / Assumptions used by management in conducting the assessment.</li> </ol> <p><b>Catatan:</b> apabila tidak terdapat hal-hal yang berpotensi berpengaruh signifikan terhadap kelangsungan usaha perusahaan pada tahun buku terakhir, agar diungkapkan asumsi yang mendasari manajemen dalam meyakini bahwa tidak terdapat hal-hal yang berpotensi berpengaruh signifikan terhadap kelangsungan usaha perusahaan pada tahun buku terakhir. / <b>Note:</b> if there were no matters that had the potential to significantly affect the continuity of the company's business in the last financial year, the company should disclose the assumptions that underlied management believe that there are no matters that had the potential to significantly affect the company's business continuity in the last financial year.</p>	257

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<b>TATA KELOLA PERUSAHAAN / GOOD CORPORATE GOVERNANCE</b>		
RUPS GMS	<p>Informasi mengenai keputusan RUPS pada tahun buku dan 1 (satu) tahun sebelum tahun buku meliputi: / Information regarding the resolutions of the GMS in the financial year and 1 (one) year before the financial year included:</p> <p>a. Keputusan RUPS pada tahun buku dan 1 (satu) tahun sebelum tahun buku yang direalisasikan pada tahun buku; dan resolutions of the GMS in the financial year and 1 (one) year before the financial year are realized in the financial year; and</p> <p>b. Keputusan RUPS pada tahun buku dan 1 (satu) tahun sebelum tahun buku yang belum direalisasikan beserta alasan belum direalisasikan; / resolutions of the GMS for the financial year and 1 (one) year before the financial year that have not been realized and the reasons for not realizing them;</p> <p>Dalam hal Emiten atau Perusahaan Publik menggunakan pihak independen dalam pelaksanaan RUPS untuk melakukan perhitungan suara, maka diungkapkan mengenai hal tersebut. / In the event that the Issuer or Public Company uses an independent party in the conduct of the GMS to calculate the votes, then this matter shall be disclosed.</p>	329
Direksi Directors	<p>1. Tugas dan tanggung jawab masing-masing anggota Direksi; Duties and responsibilities of each member of the Directors;</p> <p>Informasi mengenai tugas dan tanggung jawab masing-masing anggota Direksi diuraikan dan dapat disajikan dalam bentuk tabel. / Information regarding the duties and responsibilities of each member of the Directors is described and can be presented in tabular form.</p> <p>2. Pernyataan bahwa Direksi memiliki pedoman atau piagam (charter) Direksi; / A statement that the Directors had guidelines or charter for the Directors;</p> <p>3. Kebijakan dan pelaksanaan frekuensi rapat Direksi, rapat Direksi bersama Dewan Komisaris, dan tingkat kehadiran anggota Direksi dalam rapat tersebut termasuk kehadiran dalam RUPS; Policy and implementation of the frequency of meetings of the Directors, meetings of the Directors with the Board of Commissioners, and the level of attendance of members of the Directors in the meeting including attendance at the GMS;</p> <p>Informasi tingkat kehadiran anggota Direksi dalam rapat Direksi, rapat Direksi bersama Dewan Komisaris, atau RUPS dapat disajikan dalam bentuk tabel. / Information on the level of attendance of members of the Directors at the meeting of the Directors, the meeting of the Directors with the Board of Commissioners, or the GMS can be presented in tabular form.</p> <p>4. Pelatihan dan/atau peningkatan kompetensi anggota Direksi; Training and/or competency improvement of members of the Directors:</p> <p>a. Kebijakan pelatihan dan/atau peningkatan kompetensi anggota Direksi, termasuk program orientasi bagi anggota Direksi yang baru diangkat (jika ada); dan / Policy on training and/or improving the competence of members of the Directors, including an orientation program for newly appointed members of the Directors (if any); and</p> <p>b. Pelatihan dan/atau peningkatan kompetensi yang diikuti anggota Direksi dalam tahun buku (jika ada); / Training and/or competency improvement attended by members of the Directors in the financial year (if any);</p> <p>5. Penilaian Direksi terhadap kinerja komite yang mendukung pelaksanaan tugas Direksi pada tahun buku paling sedikit memuat: / The Directors' assessment of the performance of the committees supporting the implementation of the Directors' duties for the financial year shall at least contain:</p> <p>a. prosedur penilaian kinerja; dan performance appraisal procedures; and</p> <p>b. kriteria yang digunakan seperti capaian kinerja selama tahun buku, kompetensi dan kehadiran dalam rapat; dan the criteria used were performance achievements during the financial year, competence and attendance at meetings; and</p> <p>Dalam hal Emiten atau Perusahaan Publik tidak memiliki komite yang mendukung pelaksanaan tugas Direksi, maka diungkapkan mengenai hal tersebut. / In the event that the Issuer or Public Company did not have a committee that supports the implementation of the duties of the Directors, then this should be disclosed.</p>	369

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<p>Dewan Komisaris Board of Commissioners</p>	<ol style="list-style-type: none"> <li>1. Tugas dan tanggung jawab Dewan Komisaris; Duties and responsibilities of the Board of Commissioners;</li> <li>2. Pernyataan bahwa Dewan Komisaris memiliki pedoman atau piagam (charter) Dewan Komisaris; / A statement that the Board of Commissioners had guidelines or charter for the Board of Commissioners;</li> <li>3. Kebijakan dan pelaksanaan frekuensi rapat Dewan Komisaris, rapat Dewan Komisaris bersama Direksi dan tingkat kehadiran anggota Dewan Komisaris dalam rapat tersebut termasuk kehadiran dalam RUPS. / Policy and implementation of the frequency of meetings of the Board of Commissioners, meetings of the Board of Commissioners with the Directors and the level of attendance of members of the Board of Commissioners in these meetings, including attendance at the GMS.</li> </ol> <p>Informasi tingkat kehadiran anggota Dewan Komisaris dalam rapat Dewan Komisaris, rapat Dewan Komisaris bersama Direksi, atau RUPS dapat disajikan dalam bentuk tabel. / Information on the level of attendance of members of the Board of Commissioners at the meeting of the Board of Commissioners, the meeting of the Board of Commissioners with the Directors, or the GMS can be presented in tabular form.</p> <ol style="list-style-type: none"> <li>4. Pelatihan dan/atau peningkatan kompetensi anggota Dewan Komisaris: / training and/or competency improvement of members of the Board of Commissioners: <ol style="list-style-type: none"> <li>a. kebijakan pelatihan dan/atau peningkatan kompetensi anggota Dewan Komisaris, termasuk program orientasi bagi anggota Dewan Komisaris yang baru diangkat (jika ada); dan / policies on training and/or improving the competence of members of the Board of Commissioners, including orientation programs for newly appointed members of the Board of Commissioners (if any); and</li> <li>b. pelatihan dan/atau peningkatan kompetensi yang diikuti anggota Dewan Komisaris dalam tahun buku (jika ada); training and/or competency improvement attended by members of the Board of Commissioners in the financial year (if any);</li> </ol> </li> <li>5. Penilaian kinerja Direksi dan Dewan Komisaris serta masing-masing anggota Direksi dan anggota Dewan Komisaris, paling sedikit memuat: / Performance appraisal of the Directors and the Board of Commissioners as well as each member of the Directors and the Board of Commissioners, at least containing: <ol style="list-style-type: none"> <li>a. prosedur pelaksanaan penilaian kinerja; performance appraisal implementation procedures;</li> <li>b. kriteria yang digunakan seperti capaian kinerja selama tahun buku, kompetensi dan kehadiran dalam rapat; dan the criteria used were performance achievements during the financial year, competence and attendance at meetings; and</li> <li>c. pihak yang melakukan penilaian; dan the party conducting the assessment; and</li> </ol> </li> <li>6. Penilaian Dewan Komisaris terhadap kinerja Komite yang mendukung pelaksanaan tugas Dewan Komisaris pada tahun buku meliputi: / The assessment of the Board of Commissioners on the performance of the Committees that support the implementation of the duties of the Board of Commissioners in the financial year includes: <ol style="list-style-type: none"> <li>a. prosedur penilaian kinerja; dan performance appraisal procedures; and</li> <li>b. kriteria yang digunakan seperti capaian kinerja selama tahun buku, kompetensi dan kehadiran dalam rapat; the criteria used are performance achievements during the financial year, competence and attendance at meetings;</li> </ol> </li> </ol>	<p>341</p>
<p>Komisaris Independen (jumlahnya minimal 30% dari total Dewan Komisaris) Independent Commissioner (minimum 30% of the total Board of Commissioners)</p>	<p>Meliputi antara lain: / It included:</p> <ol style="list-style-type: none"> <li>1. Kriteria penentuan Komisaris Independen; dan Criteria for determining the Independent Commissioner; and</li> <li>2. Pernyataan tentang independensi masing-masing Komisaris Independen. / Statement on the independence of each Independent Commissioner.</li> </ol>	<p>347</p>

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<p>Nominasi dan remunerasi Direksi dan Dewan Komisaris Nomination and remuneration of the Directors and the Board of Commissioners</p>	<p>Paling sedikit memuat: / At least it contained:</p> <ol style="list-style-type: none"> <li>1. Prosedur nominasi, meliputi uraian singkat mengenai kebijakan dan proses nominasi anggota Direksi dan/atau anggota Dewan Komisaris; dan / The nomination procedure, including a brief description of the nomination policies and processes for members of the Directors and/or members of the Board of Commissioners; and</li> <li>2. Prosedur dan pelaksanaan remunerasi Direksi dan Dewan Komisaris, antara lain: / Procedures and implementation of remuneration for the Directors and the Board of Commissioners, including: <ol style="list-style-type: none"> <li>a. prosedur penetapan remunerasi Direksi dan Dewan Komisaris; / procedures for determining remuneration for the Directors and the Board of Commissioners;</li> <li>b. struktur remunerasi Direksi dan Dewan Komisaris seperti, gaji, tunjangan, tantiem/bonus dan lainnya; dan the remuneration structure of the Directors and the Board of Commissioners such as salary, allowances, tantiem/bonus and others; and</li> <li>c. besarnya remunerasi masing-masing anggota Direksi dan anggota Dewan Komisaris; / the amount of remuneration for each member of the Directors and member of the Board of Commissioners;</li> </ol> </li> </ol> <p>Pengungkapan informasi dapat disajikan dalam bentuk tabel. Disclosure of information can be presented in tabular form.</p>	399
<p>Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum Implementation of Good Corporate Governance in Providing Remuneration for Commercial Banks</p>		399
<p>Komite Audit Audit committee</p>	<ol style="list-style-type: none"> <li>1. Nama dan jabatannya dalam keanggotaan komite; Name and position in committee membership;</li> <li>2. Usia; / Age;</li> <li>3. Kewarganegaraan; / Nationality;</li> <li>4. Riwayat pendidikan; / Educational history;</li> <li>5. Riwayat jabatan, meliputi informasi: Position history, including information on: <ol style="list-style-type: none"> <li>a. Dasar hukum penunjukan sebagai anggota komite; Legal basis for appointment as committee member;</li> <li>b. Rangkap jabatan, baik sebagai anggota dewan komisaris, anggota direksi, dan/atau anggota komite serta jabatan lainnya (jika ada); dan / Concurrent positions, either as a member of the board of commissioners, member of the Directors, and/or committee member and other positions (if any); and</li> <li>c. Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; Work experience and period of time both inside and outside the issuer or public company;</li> </ol> </li> <li>6. Periode dan masa jabatan anggota komite audit; Period and term of office of audit committee members;</li> <li>7. Pernyataan independensi komite audit; Statement of independence of the audit committee;</li> <li>8. Pelatihan dan/atau peningkatan kompetensi yang telah diikuti dalam tahun buku (jika ada); / Training and/or competency improvement that have been followed in the financial year (if any);</li> <li>9. Kebijakan dan pelaksanaan frekuensi rapat komite audit dan tingkat kehadiran anggota komite audit dalam rapat tersebut; dan Policy and implementation of the frequency of audit committee meetings and the level of attendance of audit committee members at the meeting; and</li> <li>10. Pelaksanaan kegiatan komite audit pada tahun buku sesuai dengan yang dicantumkan dalam pedoman atau piagam (charter) komite audit; / Implementation of the audit committee's activities for the financial year in accordance with the guidelines or charter of the audit committee;</li> </ol>	415

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<p>Komite atau fungsi nominasi dan remunerasi Emiten atau Perusahaan Publik Committee or function of nomination and remuneration Issuers or Public Companies</p>	<p>Paling sedikit memuat: / At least it contained:</p> <ol style="list-style-type: none"> <li>1. Nama dan jabatannya dalam keanggotaan komite; Name and position in committee membership;</li> <li>2. Usia; / Age;</li> <li>3. Kewarganegaraan; / Nationality;</li> <li>4. Riwayat pendidikan; / Educational history;</li> <li>5. Riwayat jabatan, meliputi informasi: Position history, including information on:               <ol style="list-style-type: none"> <li>a. Dasar hukum penunjukan sebagai anggota komite; Legal basis for appointment as committee member;</li> <li>b. Rangkap jabatan, baik sebagai anggota Dewan Komisaris, anggota Direksi, dan/atau anggota komite serta jabatan lainnya (jika ada); dan / Concurrent positions, either as a member of the Board of Commissioners, member of the Directors, and/or committee member and other positions (if any); and</li> <li>c. Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; Work experience and period of time both inside and outside the Issuer or Public Company;</li> </ol> </li> <li>6. Periode dan masa jabatan anggota komite; The period and term of office of the committee members;</li> <li>7. Pernyataan independensi komite; Committee independence statement;</li> <li>8. Pelatihan dan/atau peningkatan kompetensi yang telah diikuti dalam tahun buku (jika ada); / Training and/or competency improvement that have been followed in the financial year (if any);</li> <li>9. Uraian tugas dan tanggung jawab; Description of duties and responsibilities;</li> <li>10. Pernyataan bahwa telah memiliki pedoman atau piagam (<i>charter</i>); A statement of having a guideline or charter (<i>charter</i>);</li> <li>11. Kebijakan dan pelaksanaan frekuensi rapat dan tingkat kehadiran anggota dalam rapat tersebut; / Policy and implementation of the frequency of meetings and the level of attendance of members at the meeting;</li> <li>12. Uraian singkat pelaksanaan kegiatan pada tahun buku; dan Brief description of the implementation of activities in the financial year; and</li> </ol> <p>Dalam hal tidak dibentuk komite nominasi dan remunerasi, Emiten atau Perusahaan Publik cukup mengungkapkan informasi sebagaimana dimaksud dalam huruf i) sampai dengan huruf l) dan mengungkapkan: / In the event that no nomination and remuneration committee is formed, the Issuer or Public Company is sufficient to disclose the information as referred to in letter i) to letter l) and disclose:</p> <ol style="list-style-type: none"> <li>1. Alasan tidak dibentuknya komite; dan Reasons for not forming the committee; and</li> <li>2. Pihak yang melaksanakan fungsi nominasi dan remunerasi; The party carrying out the nomination and remuneration function;</li> </ol>	<p>411</p>



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<p>Komite lain yang dimiliki Emiten atau Perusahaan Publik dalam rangka mendukung fungsi dan tugas Direksi (jika ada) dan/atau komite yang mendukung fungsi dan tugas Dewan Komisaris</p> <p>Other committees owned by the Issuer or Public Company in order to support the functions and duties of the Directors (if any) and/or committees that supported the functions and duties of the Board of Commissioners</p>	<p>Paling sedikit memuat: / At least it contained:</p> <ol style="list-style-type: none"> <li>1. Nama dan jabatannya dalam keanggotaan komite; Name and position in committee membership;</li> <li>2. Usia; / Age;</li> <li>3. Kewarganegaraan; / Nationality;</li> <li>4. Riwayat pendidikan; / Educational history;</li> <li>5. Riwayat jabatan, meliputi informasi: Position history, including information on: <ol style="list-style-type: none"> <li>a. Dasar hukum penunjukan sebagai anggota komite; Legal basis for appointment as committee member;</li> <li>b. Rangkap jabatan, baik sebagai anggota dewan komisaris, anggota direksi, dan/atau anggota komite serta jabatan lainnya (jika ada); dan / Concurrent positions, either as a member of the board of commissioners, member of the Directors, and/or committee member and other positions (if any); and</li> <li>c. Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; Work experience and period of time both inside and outside the issuer or public company;</li> </ol> </li> <li>6. Periode dan masa jabatan anggota komite; The period and term of office of the committee members;</li> <li>7. Pernyataan independensi komite; Committee independence statement;</li> <li>8. Pelatihan dan/atau peningkatan kompetensi yang telah diikuti dalam tahun buku (jika ada); dan / Training and/or competency improvement followed in the financial year (if any); and</li> <li>9. Uraian tugas dan tanggung jawab; Description of duties and responsibilities;</li> <li>10. Pernyataan bahwa telah memiliki pedoman atau piagam (charter) komite; / A statement that the committee has had guidelines or charters;</li> <li>11. Kebijakan dan pelaksanaan frekuensi rapat komite dan tingkat kehadiran anggota komite dalam rapat tersebut; dan Policy and implementation of the frequency of committee meetings and the level of attendance of committee members at the meeting; and</li> <li>12. Uraian singkat pelaksanaan kegiatan komite pada tahun buku; Brief description of the committee's activities for the financial year;</li> </ol>	405; 427
<p>Sekretaris perusahaan Company secretary</p>	<ol style="list-style-type: none"> <li>1. Nama; / Name;</li> <li>2. Domisili; / Domicile;</li> <li>3. Riwayat jabatan, meliputi: / Position history, including: <ol style="list-style-type: none"> <li>a. Dasar hukum penunjukan sebagai sekretaris perusahaan; dan Legal basis for appointment as company secretary; and</li> <li>b. Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; Work experience and period of time both inside and outside the issuer or public company;</li> <li>c. Riwayat pendidikan; / Educational history;</li> <li>d. Pelatihan dan/atau peningkatan kompetensi yang diikuti dalam tahun buku; dan / Training and/or competency improvement that was followed in the financial year; and</li> <li>e. Uraian singkat pelaksanaan tugas sekretaris perusahaan pada tahun buku; / A brief description of the implementation of the duties of the corporate secretary for the financial year;</li> </ol> </li> </ol>	460

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Unit Audit Internal Internal Audit Unit	<ol style="list-style-type: none"> <li>1. Nama kepala unit audit internal; Name of the head of the internal audit unit;</li> <li>2. Riwayat jabatan, meliputi: / Position history, including: <ol style="list-style-type: none"> <li>a. Dasar hukum penunjukan sebagai kepala unit audit internal; dan / Legal basis for appointment as head of internal audit unit; and</li> <li>b. Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; Work experience and period of time both inside and outside the issuer or public company;</li> </ol> </li> <li>3. Kualifikasi atau sertifikasi sebagai profesi audit internal (jika ada); / Qualification or certification as an internal audit profession (if any);</li> <li>4. Pelatihan dan/atau peningkatan kompetensi yang diikuti dalam tahun buku; / Training and/or competency improvement that was followed in the financial year;</li> <li>5. Struktur dan kedudukan unit audit internal; The structure and position of the internal audit unit;</li> <li>6. Uraian tugas dan tanggung jawab; Description of duties and responsibilities;</li> <li>7. Pernyataan bahwa telah memiliki pedoman atau piagam (charter) unit audit internal; dan / A statement that the internal audit unit had a guideline or charter; and</li> <li>8. Uraian singkat pelaksanaan tugas unit audit internal pada tahun buku termasuk kebijakan dan pelaksanaan frekuensi rapat dengan direksi, dewan komisaris, dan/atau komite audit; A brief description of the implementation of the internal audit unit's duties for the financial year including the policy and implementation of the frequency of meetings with the Directors, board of commissioners, and/or audit committee;</li> </ol>	462
Akuntan Publik Public Accountant	<ol style="list-style-type: none"> <li>1. Nama dan tahun akuntan publik yang melakukan audit laporan keuangan tahunan selama 5 tahun terakhir; Name and year of the public accountant who audited the annual financial statements for the last 5 years;</li> <li>2. Nama dan tahun Kantor Akuntan Publik yang melakukan audit laporan keuangan tahunan selama 5 tahun terakhir; Name and year of the Public Accounting Firm that audited the annual financial statements for the last 5 years;</li> <li>3. Besarnya fee untuk masing-masing jenis jasa yang diberikan oleh Kantor Akuntan Publik pada tahun buku terakhir; dan The amount of the fee for each type of service provided by the Public Accounting Firm in the last financial year; and</li> <li>4. Jasa lain yang diberikan Kantor Akuntan Publik dan akuntan publik selain jasa audit laporan keuangan tahunan pada tahun buku terakhir. / Other services provided by Public Accounting Firms and public accountants other than auditing services for annual financial statements in the last financial year.</li> </ol> <p><b>Catatan:</b> apabila tidak ada jasa lain dimaksud, agar diungkapkan. <b>Note:</b> if there was no other service, it should be disclosed.</p>	470
Uraian mengenai sistem pengendalian internal (internal Control) yang diterapkan oleh emiten atau perusahaan Publik, A description of the internal control system implemented by the issuer or public company,	<ol style="list-style-type: none"> <li>1. Pengendalian keuangan dan operasional, serta kepatuhan terhadap peraturan perundang-undangan lainnya; Financial and operational control, as well as compliance with other laws and regulations;</li> <li>2. Tinjauan atas efektivitas sistem pengendalian internal; dan Review of the effectiveness of the internal control system; and</li> <li>3. Pernyataan Direksi dan/atau Dewan Komisaris atas kecukupan sistem pengendalian internal; Statement of the Directors and/or Board of Commissioners on the adequacy of the internal control system;</li> </ol>	472

Kriteria Criteria	Penjelasan Explanation	Halaman Page
<p>Sistem manajemen risiko yang diterapkan oleh Emiten Atau Perusahaan Publik</p> <p>The risk management system implemented by the Issuer or Public Company</p>	<ol style="list-style-type: none"> <li>Gambaran umum mengenai sistem manajemen risiko Emiten atau Perusahaan Publik; / General description of the risk management system of the Issuer or Public Company;</li> <li>Jenis risiko dan cara pengelolaannya; / Types of risks and how to manage them;</li> <li>Tinjauan atas efektivitas sistem manajemen risiko Emiten atau Perusahaan Publik; dan / Overview of the effectiveness of the risk management system or Public Company; and</li> <li>Pernyataan Direksi dan/atau Dewan Komisaris atau komite audit atas kecukupan sistem manajemen risiko; / Statement of the Directors and/or the Board of Commissioners or the audit committee on the adequacy of the risk management system;</li> </ol>	551
<p>Perkara hukum yang berdampak material yang dihadapi Oleh emiten atau perusahaan publik, entitas anak, Anggota direksi dan anggota dewan komisaris (jika ada),</p> <p>Legal cases that have a material impact faced by the issuer or public company, subsidiaries, members of the Directors and members of the board of commissioners (if any),</p>	<ol style="list-style-type: none"> <li>Pokok perkara/gugatan; / Principal case/lawsuit;</li> <li>Status penyelesaian perkara/gugatan; dan / Status of settlement of cases/claims; and</li> <li>Pengaruhnya terhadap kondisi emiten atau perusahaan publik; / The effect on the condition of the issuer or public company;</li> </ol>	489
<p>Informasi tentang sanksi administratif/ sanksi yang Dikenakan kepada emiten atau perusahaan publik, Anggota dewan komisaris dan anggota direksi, oleh Otoritas jasa keuangan dan otoritas lainnya pada tahun Buku (jika ada)</p> <p>Information on administrative sanctions/ sanctions imposed on issuers or public companies, members of the board of commissioners and members of the Directors, by the financial services authority and other authorities in the financial year (if any)</p>		498
<p>Akses informasi dan data perusahaan: Uraian mengenai tersedianya akses informasi dan data perusahaan kepada publik, misalnya melalui website (dalam bahasa Indonesia dan bahasa Inggris), media massa, mailing list, buletin, pertemuan dengan analis, dan sebagainya.</p> <p>Access to company information and data: A description of the availability of access to company information and data to the public, for example through the website (in Indonesian and English), mass media, mailing lists, bulletins, meetings with analysts, and so on.</p>		514
<p>Informasi mengenai kode etik Emiten atau Perusahaan Publik</p> <p>Information regarding the code of conduct of the Issuer or Public Company</p>	<ol style="list-style-type: none"> <li>Pokok-pokok kode etik; / The points of the code of ethics;</li> <li>Pengungkapan bahwa kode etik berlaku bagi seluruh level organisasi; / Disclosure that the code of ethics applied to all levels of the organization;</li> <li>Penyebarluasan kode etik; / Dissemination of the code of ethics;</li> <li>Sanksi untuk masing-masing jenis pelanggaran yang diatur dalam kode etik (normatif); dan / Sanctions for each type of violation stipulated in the code of ethics (normative); and</li> <li>Jumlah pelanggaran kode etik beserta sanksi yang diberikan pada tahun buku terakhir. / The number of violations of the code of ethics along with the sanctions given in the last financial year.</li> </ol> <p><b>Catatan:</b> apabila tidak terdapat pelanggaran kode etik pada tahun buku terakhir, agar diungkapkan. <b>Note:</b> if there is no violation of the code of ethics in the last financial year, it must be disclosed.</p>	500

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<p>Uraian singkat mengenai kebijakan pemberian Kompensasi jangka panjang berbasis kinerja kepada manajemen dan/atau karyawan yang dimiliki oleh emiten Atau perusahaan publik (jika ada), antara lain berupa Program kepemilikan saham oleh manajemen (management stock ownership program/ msop) dan/atau Program kepemilikan saham oleh karyawan (employee Stock ownership program/esop); Dalam hal pemberian kompensasi berupa program Kepemilikan saham oleh manajemen (<i>management stock Ownership program/MSOP</i>) dan/atau program Kepemilikan saham oleh karyawan (<i>employee stock Ownership program/ESOP</i>),</p> <p>A brief description of the policy of providing long-term performance-based compensation to management and/ or employees owned by the issuer or public company (if any), including the management stock ownership program (MSOP) and/ or stock ownership program by employees (employee Stock ownership program/ESOP); In the case of providing compensation in the form of a management stock ownership program (MSOP) and/ or an employee stock ownership program (ESOP),</p>	<p>Informasi yang diungkapkan Paling sedikit memuat: Information disclosed should at least contain:</p> <ol style="list-style-type: none"> <li>1. Jumlah saham dan/atau opsi; Number of shares and/or options;</li> <li>2. Jangka waktu pelaksanaan; Implementation period;</li> <li>3. Persyaratan karyawan dan/atau manajemen yang berhak; dan Requirements for eligible employees and/or management; and</li> <li>4. Harga pelaksanaan atau penentuan harga pelaksanaan. Execution price or determination of exercise price.</li> </ol>	230
<p>Uraian singkat mengenai kebijakan pengungkapan Informasi Brief description of Information disclosure policy</p>	<ol style="list-style-type: none"> <li>1. Kepemilikan saham anggota direksi dan anggota Dewan komisaris paling lambat 3 (tiga) hari kerja Setelah terjadinya kepemilikan atau setiap Perubahan kepemilikan atas saham perusahaan Terbuka; dan / Share ownership of members of the Directors and members of the board of commissioners no later than 3 (three) working days after the occurrence of ownership or any change in ownership of shares of a public company; and</li> <li>2. Pelaksanaan atas kebijakan dimaksud; Implementation of the policy;</li> </ol>	112
<p>Uraian mengenai sistem pelaporan pelanggaran (<i>whistleblowing system</i>) di Emiten atau Perusahaan Publik Description of the whistleblowing system at the Issuer or Public Company</p>	<ol style="list-style-type: none"> <li>1. Cara penyampaian laporan pelanggaran; How to submit a violation report;</li> <li>2. Perlindungan bagi pelapor; / Protection for whistleblowers;</li> <li>3. Penanganan pengaduan; / Handling of complaints;</li> <li>4. Pihak yang mengelola pengaduan; dan The party managing the complaint; and</li> <li>5. Hasil dari penanganan pengaduan, paling sedikit: The results of the handling of complaints, at least: <ol style="list-style-type: none"> <li>a. Jumlah pengaduan yang masuk dan diproses Dalam tahun buku; dan / Number of complaints received and processed in the financial year; and</li> <li>b. Tindak lanjut pengaduan; / Follow-up on complaints;</li> </ol> </li> </ol> <p>Dalam hal emiten atau perusahaan publik tidak memiliki Sistem pelaporan pelanggaran (<i>whistleblowing system</i>), Maka diungkapkan mengenai hal tersebut. / In the event that the issuer or public company did not have a whistleblowing system, then this should be disclosed.</p>	506

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<p>Uraian mengenai kebijakan anti korupsi Emiten atau Perusahaan Publik Description of the Issuer's or Public Company's anti-corruption policy</p>	<ol style="list-style-type: none"> <li>1. Program dan prosedur yang dilakukan dalam Mengatasi praktik korupsi, balas jasa (<i>kickbacks</i>), <i>Fraud</i>, suap dan/atau gratifikasi dalam Emiten atau Perusahaan Publik; dan Programs and procedures implemented in overcoming the practice of corruption, kickbacks, fraud, bribery and/or gratuities in Issuers or Public Companies; and</li> <li>2. Pelatihan/sosialisasi anti korupsi kepada karyawan Emiten atau Perusahaan Publik; / Anti-corruption training/socialization for employees of Issuers or Public Companies;</li> </ol> <p>Dalam hal Emiten atau Perusahaan Publik tidak memiliki Kebijakan anti korupsi, maka dijelaskan alasan tidak Dimilikinya kebijakan dimaksud. / In the event that the Issuer or Public Company did not have an anti-corruption policy, the reasons for not having the said policy should be explained.</p>	505
<p>Kebijakan mengenai keberagaman komposisi Dewan Komisaris dan Direksi. Uraian kebijakan tertulis Perusahaan mengenai keberagaman komposisi Dewan Komisaris dan Direksi dalam pendidikan (bidang studi), pengalaman kerja, usia, dan jenis kelamin. Catatan: apabila tidak ada kebijakan dimaksud, agar diungkapkan alasan dan pertimbangannya. Policy regarding the diversity of the composition of the Board of Commissioners and the Directors. Description of the Company's written policies regarding the diversity of the composition of the Board of Commissioners and Directors in education (field of study), work experience, age, and gender. Note: if there was no such policy, the reasons and considerations should be disclosed.</p>		394
<p>Penerapan atas pedoman tata kelola Perusahaan Terbuka bagi Emiten yang menerbitkan efek bersifat ekuitas atau Perusahaan Publik Implementation of Public Company governance guidelines for Issuers issuing equity securities or Public Companies</p>	<ol style="list-style-type: none"> <li>1. Pernyataan mengenai rekomendasi yang telah dilaksanakan; dan/atau / Statement of recommendations that had been implemented; and/or</li> <li>2. Penjelasan atas rekomendasi yang belum dilaksanakan, disertai alasan dan alternative pelaksanaannya (jika ada). / Explanation of recommendations that had not been implemented, along with reasons and alternative implementations (if any).</li> </ol> <p>Pengungkapan informasi dapat disajikan dalam bentuk tabel. Disclosure of information can be presented in tabular form.</p>	517
<p>Penilaian Penerapan GCG untuk tahun buku 2020 yang meliputi paling kurang aspek Dewan Komisaris dan Direksi GCG Implementation Assessment for the financial year 2020 which included at least aspects of the Board of Commissioners and the Directors</p>	<p>Memuat uraian mengenai: / It contained a description of:</p> <ol style="list-style-type: none"> <li>1. Kriteria yang digunakan dalam penilaian Criteria used in the assessment</li> <li>2. Pihak yang melakukan penilaian The party conducting the assessment</li> <li>3. Skor penilaian masing-masing kriteria The assessment score of each criterion</li> <li>4. Rekomendasi hasil penilaian Recommended assessment results</li> <li>5. Alasan belum/tidak diterapkannya rekomendasi. Reasons for not yet/not implemented recommendations.</li> </ol>	319

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<b>TANGGUNG JAWAB SOSIAL DAN LINGKUNGAN EMITEN ATAU PERUSAHAAN PUBLIK</b> <b>SOCIAL AND ENVIRONMENTAL RESPONSIBILITY OF ISSUERS OR PUBLIC COMPANIES</b>		
Tanggung Jawab Sosial Perusahaan <i>Corporate Social Responsibility</i>	<ol style="list-style-type: none"> <li>1. Informasi yang diungkapkan dalam bagian tanggung jawab sosial dan lingkungan merupakan Laporan Keberlanjutan (<i>Sustainability Report</i>) sebagaimana dimaksud dalam Peraturan Otoritas Jasa Keuangan Nomor 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik, paling sedikit memuat: / The information disclosed in the social and environmental responsibility section is a Sustainability Report as referred to in the Financial Services Authority Regulation Number 51/POJK.03/2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies, at most slightly load:               <ol style="list-style-type: none"> <li>a) Penjelasan strategi keberlanjutan; Explanation of the sustainability strategy;</li> <li>b) Ikhtisar aspek keberlanjutan (ekonomi, sosial, dan lingkungan hidup); / Summary of sustainability aspects (economic, social, and environmental);</li> <li>c) Profil singkat Emiten atau Perusahaan Publik; Brief profile of the Issuer or Public Company;</li> <li>d) Penjelasan Direksi; / Explanation of the Directors;</li> <li>e) Tata kelola keberlanjutan; / Sustainability governance;</li> <li>f) Kinerja keberlanjutan; / Sustainability performance;</li> <li>g) Verifikasi tertulis dari pihak independen, jika ada; Written verification from an independent party, if any;</li> <li>h) Lembar umpan balik (<i>feedback</i>) untuk pembaca, jika ada; dan / Feedback sheet for readers, if any; and</li> <li>i) Tanggapan Emiten atau Perusahaan Publik terhadap umpan balik laporan tahun sebelumnya./ Issuer's or Public Company's response to the previous year's report feedback.</li> </ol> </li> <li>2. Laporan Keberlanjutan sebagaimana dimaksud pada angka 1), harus disusun sesuai Pedoman Teknis Penyusunan Laporan Keberlanjutan (<i>Sustainability Report</i>) Bagi Emiten dan Perusahaan Publik sebagaimana tercantum dalam Lampiran II yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini; / The Sustainability Report as referred to in number 1) must be prepared in accordance with the Technical Guidelines for the Preparation of a Sustainability Report for Issuers and Public Companies as contained in Appendix II which is an integral part of this Financial Services Authority Circular Letter;</li> <li>3. Informasi Laporan Keberlanjutan (<i>Sustainability Report</i>) pada angka 1) dapat: / Information on the Sustainability Report in point 1) can:               <ol style="list-style-type: none"> <li>a) Diungkapkan pada bagian lain yang relevan di luar bagian tanggung jawab sosial dan lingkungan, seperti penjelasan Direksi terkait Laporan Keberlanjutan diungkapkan dalam bagian terkait Laporan Direksi; dan/atau Disclosed in other relevant sections outside of the social and environmental responsibility section, such as the Directors' explanation regarding the Sustainability Report disclosed in the section related to the Directors' Report; and/or</li> <li>b) Merujuk pada bagian lain di luar bagian tanggung jawab sosial dan lingkungan dengan tetap mengacu pada Pedoman Teknis Penyusunan Laporan Keberlanjutan (<i>Sustainability Report</i>) Bagi Emiten dan Perusahaan Publik sebagaimana tercantum dalam Lampiran II yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini, seperti profil Emiten atau Perusahaan Publik; / Referring to other sections outside the social and environmental responsibility section while still referring to the Technical Guidelines for the Preparation of Sustainability Reports for Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular Letter, such as the profile of the Issuer or Public Company;</li> </ol> </li> <li>4. Laporan Keberlanjutan (<i>Sustainability Report</i>) sebagaimana dimaksud pada angka 1) merupakan bagian yang tidak terpisahkan dari Laporan Tahunan namun dapat disajikan secara terpisah dengan Laporan Tahunan; / The Sustainability Report as referred to in number 1) is an inseparable part of the Annual Report but can be presented separately from the Annual Report;</li> </ol>	534-545

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	<p>5. Dalam hal Laporan Keberlanjutan disajikan secara terpisah dengan Laporan Tahunan, informasi yang diungkapkan dalam Laporan Keberlanjutan dimaksud harus: / In the event that the Sustainability Report is presented separately from the Annual Report, the information disclosed in the said Sustainability Report must:</p> <p>a) Memuat seluruh informasi sebagaimana dimaksud pada angka 1); dan / Contains all the information as referred to in number 1); and</p> <p>b) Disusun sesuai Pedoman Teknis Penyusunan Laporan Keberlanjutan (Sustainability Report) Bagi Emiten dan Perusahaan Publik sebagaimana tercantum dalam Lampiran II yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini; / Compiled according to the Technical Guidelines for the Preparation of Sustainability Reports for Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular Letter;</p> <p>6. Dalam hal Laporan Keberlanjutan disajikan secara terpisah dengan Laporan Tahunan, maka dalam bagian tanggung jawab sosial dan lingkungan memuat informasi bahwa informasi mengenai tanggung jawab sosial dan lingkungan telah diungkapkan dalam Laporan Keberlanjutan yang disajikan secara terpisah dari Laporan Tahunan; dan / In the event that the Sustainability Report is presented separately from the Annual Report, then the social and environmental responsibility section contains information that information regarding social and environmental responsibility has been disclosed in the Sustainability Report which is presented separately from the Annual Report; and</p> <p>7. Penyampaian Laporan Keberlanjutan (Sustainability Report) yang disajikan secara terpisah dengan Laporan Tahunan harus disampaikan bersamaan dengan penyampaian Laporan Tahunan. / Submission of the Sustainability Report which is presented separately from the Annual Report must be submitted together with the submission of the Annual Report.</p>	
<b>INFORMASI KEUANGAN / FINANCIAL INFORMATION</b>		
Surat Pernyataan Direksi dan/ atau Dewan Komisaris tentang Tanggung Jawab atas Laporan Keuangan Statement Letter of the Directors and/ or Board of Commissioners regarding Responsibility for Financial Statements	Kesesuaian dengan peraturan terkait tentang Tanggung Jawab atas Laporan Keuangan. Compliance with related regulations regarding Responsibility for Financial Statements.	√
Opini auditor independen atas laporan keuangan Independent auditor's opinion on financial statements		√
Deskripsi Auditor Independen di Opini Description of Independent Auditor in Opinion	<p>Deskripsi memuat tentang: / The description contained about:</p> <ol style="list-style-type: none"> <li>1. Nama dan tanda tangan; / Name and signature;</li> <li>2. Tanggal Laporan Audit; dan / Date of the Audit Report; and</li> <li>3. Nomor ijin KAP dan nomor ijin Akuntan Publik. KAP license number and Public Accountant license number.</li> </ol>	√
Laporan keuangan yang lengkap Complete financial reports	<p>Memuat secara lengkap unsur-unsur laporan keuangan: It completely contained the elements of the financial statements:</p> <ol style="list-style-type: none"> <li>1. Laporan posisi keuangan; / Statement of financial position;</li> <li>2. Laporan laba rugi dan penghasilan komprehensif lain; Statement of profit or loss and other comprehensive income;</li> <li>3. Laporan perubahan ekuitas; / Statement of changes in equity;</li> <li>4. Laporan arus kas; / Cash flow statement;</li> <li>5. Catatan atas laporan keuangan; / Notes to financial statements;</li> <li>6. Informasi komparatif mengenai periode sebelumnya; dan Comparative information about the previous period; and</li> <li>7. Laporan posisi keuangan pada awal periode sebelumnya ketika entitas menerapkan suatu kebijakan akuntansi secara retrospektif atau membunyah kembali pos-pos laporan keuangan, atau ketika entitas mereklasifikasi pos-pos dalam laporan keuangannya (jika relevan). / Statement of financial position at the beginning of the previous period when the entity applies an accounting policy retrospectively or restates financial statement items, or when the entity reclassifies items in its financial statements (if relevant).</li> </ol>	√



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Perbandingan tingkat profitabilitas Profitability level comparison	Perbandingan kinerja/laba (rugi) tahun berjalan dengan tahun sebelumnya / Comparison of performance/profit (loss) for the current year with the previous year	√
Laporan Arus Kas Cash flow statement	Memenuhi ketentuan sebagai berikut: It should meet the following conditions: <ol style="list-style-type: none"> <li>1. Pengelompokan dalam tiga kategori aktivitas: operasi, investasi, dan pendanaan; / Grouping into three categories of activities: operating, investing, and financing;</li> <li>2. Penggunaan metode langsung (<i>direct method</i>) untuk melaporkan arus kas dari aktivitas operasi; / Using the direct method to report cash flows from operating activities;</li> <li>3. Pemisahan penyajian antara penerimaan kas dan atau pengeluaran kas selama tahun berjalan pada aktivitas operasi, investasi dan pendanaan; dan / Separation of presentation between cash receipts and or cash disbursements during the year in operating, investing and financing activities; and</li> <li>4. Pengungkapan transaksi non kas harus dicantumkan dalam catatan atas laporan keuangan. / Disclosure of non-cash transactions must be included in the notes to the financial statements.</li> </ol>	√
Ikhtisar Kebijakan Akuntansi Accounting Policy Overview	Meliputi sekurang-kurangnya: / It included at least: <ol style="list-style-type: none"> <li>1. Pernyataan kepatuhan terhadap SAK; / Statement of compliance with SAK;</li> <li>2. Dasar pengukuran dan penyusunan laporan keuangan; / Basis of measurement and preparation of financial statements;</li> <li>3. Pajak penghasilan; / Income tax;</li> <li>4. Imbalan kerja; dan / Work benefits; and</li> <li>5. Instrumen Keuangan. / Financial Instruments.</li> </ol>	√
Pengungkapan transaksi pihak berelasi Disclosure of related party transactions	Hal-hal yang diungkapkan antara lain: The things that were disclosed included: <ol style="list-style-type: none"> <li>1. Nama pihak berelasi, serta sifat dan hubungan dengan pihak berelasi; / Name of the related party, as well as the nature and relationship with the related party;</li> <li>2. Nilai transaksi beserta persentasenya terhadap total pendapatan dan beban terkait; dan / Transaction value and its percentage to the total related revenues and expenses; and</li> <li>3. Jumlah saldo beserta persentasenya terhadap total aset atau liabilitas terkait. / Total balance and its percentage to the total related assets or liabilities.</li> </ol>	√
Pengungkapan yang berhubungan dengan perpajakan Disclosures related to taxation	Hal-hal yang harus diungkapkan: The things that were disclosed included: <ol style="list-style-type: none"> <li>1. Rekonsiliasi fiskal dan perhitungan beban pajak kini; / Fiscal reconciliation and calculation of current tax burden;</li> <li>2. Penjelasan hubungan antara beban (penghasilan) pajak dan laba akuntansi; / Explanation of the relationship between tax expense (income) and accounting profit;</li> <li>3. Pernyataan bahwa Laba Kena Pajak (LKP) hasil rekonsiliasi dijadikan dasar dalam pengisian SPT Tahunan PPh Badan; / A statement that the reconciled Taxable Profit (LKP) was used as the basis for filling out the Annual Corporate Income Tax Return;</li> <li>4. Rincian aset dan liabilitas pajak tangguhan yang diakui pada laporan posisi keuangan untuk setiap periode penyajian, dan jumlah beban (penghasilan) pajak tangguhan yang diakui pada laporan laba rugi apabila jumlah tersebut tidak terlihat dari jumlah aset atau liabilitas pajak tangguhan yang diakui pada laporan posisi keuangan; dan / Details of deferred tax assets and liabilities recognized in the statement of financial position for each presentation period, and the amount of deferred tax expense (income) recognized in profit or loss if the amount was not reflected in the amount of deferred tax assets or liabilities recognized in the statement of position. finance; and</li> <li>5. Pengungkapan ada atau tidak ada sengketa pajak. / Disclosure of whether or not there is a tax dispute.</li> </ol>	√

Kriteria Criteria	Penjelasan Explanation	Halaman Page
Pengungkapan yang berhubungan dengan aset tetap Disclosures relating to fixed assets	Hal-hal yang harus diungkapkan: The things that were disclosed included: <ol style="list-style-type: none"> <li>1. Metode penyusutan yang digunakan; The depreciation method used;</li> <li>2. Uraian mengenai kebijakan akuntansi yang dipilih antara model revaluasi an model biaya; / A description of the accounting policy chosen between the revaluation model and the cost model;</li> <li>3. Metode dan asumsi signifikan yang digunakan dalam mengestimasi nilai wajar aset tetap (untuk model revaluasi) atau pengungkapan nilai wajar aset tetap (untuk model biaya); dan The significant methods and assumptions used in estimating the fair value of property, plant and equipment (for the revaluation model) or the disclosure of the fair value of property, plant and equipment (for the cost model); and</li> <li>4. Rekonsiliasi jumlah tercatat bruto dan akumulasi penyusutan aset tetap pada awal dan akhir periode dengan menunjukkan: penambahan, pengurangan reklasifikasi. / Reconciliation of gross carrying amount and accumulated depreciation of property, plant and equipment at the beginning and end of the period by showing: addition, subtraction and reclassification.</li> </ol>	√
Pengungkapan yang berhubungan dengan segmen operasi Disclosures relating to operating segments	Hal-hal yang harus diungkapkan: The things that were disclosed included: <ol style="list-style-type: none"> <li>1. Informasi umum yang meliputi faktor-faktor yang digunakan untuk mengidentifikasi segmen yang dilaporkan; General information covering the factors used to identify the reported segments;</li> <li>2. Informasi tentang laba rugi, aset, dan liabilitas segmen yang dilaporkan; / Information on the reported segment's profit or loss, assets and liabilities;</li> <li>3. Rekonsiliasi dari total pendapatan segmen, laba rugi segmen yang dilaporkan, aset segmen, liabilitas segmen, dan unsur material segmen lainnya terhadap jumlah terkait dalam entitas; dan / Reconciliation of total segment revenue, reported segment profit or loss, segment assets, segment liabilities, and other material segment elements to the related amounts within the entity; and</li> <li>4. Pengungkapan pada level entitas, yang meliputi informasi tentang produk dan/ atau jasa, wilayah geografis dan pelanggan utama. / Disclosure at the entity level, which included information about products and/or services, geographic areas and key customers.</li> </ol>	√
Pengungkapan yang berhubungan dengan Instrumen Keuangan Disclosures relating to Financial Instruments	Hal-hal yang harus diungkapkan: The things that were disclosed included: <ol style="list-style-type: none"> <li>1. Rincian instrumen keuangan yang dimiliki berdasarkan klasifikasinya; / Details of financial instruments owned based on their classification;</li> <li>2. Nilai wajar dan hirarkinya untuk setiap kelompok instrumen keuangan; / Fair values and their hierarchy for each group of financial instruments;</li> <li>3. Penjelasan risiko yang terkait dengan instrumen keuangan: risiko pasar, risiko kredit dan risiko likuiditas; / Explanation of risks associated with financial instruments: market risk, credit risk and liquidity risk;</li> <li>4. Kebijakan manajemen risiko; dan Risk management policy; and</li> <li>5. Analisis risiko yang terkait dengan instrumen keuangan secara kuantitatif. / Analysis of the risks associated with financial instruments quantitatively.</li> </ol>	√
Penerbitan laporan keuangan Issuance of financial statements	Hal-hal yang diungkapkan antara lain: The things that were disclosed included: <ol style="list-style-type: none"> <li>1. Tanggal laporan keuangan diotorisasi untuk terbit; dan The date on which the financial statements were authorized for issue; and</li> <li>2. Pihak yang bertanggung jawab mengotorisasi laporan keuangan. / The party responsible for authorizing the financial statements.</li> </ol>	√



# Laporan Keuangan Konsolidasian

Consolidated Financial Statements



PT Bank Victoria International Tbk  
dan entitas anaknya/*and its subsidiaries*

Laporan keuangan konsolidasian  
tanggal 31 Desember 2021  
dan untuk tahun yang berakhir pada tanggal tersebut  
beserta laporan auditor independen/  
*Consolidated financial statements  
as of December 31, 2021 and for the year then ended  
with independent auditors' report*



**SURAT PERNYATAAN DEWAN DIREKSI  
TENTANG TANGGUNG JAWAB ATAS  
LAPORAN KEUANGAN  
TANGGAL 31 DESEMBER 2021  
DAN UNTUK TAHUN YANG BERAKHIR PADA  
TANGGAL TERSEBUT  
PT BANK VICTORIA INTERNATIONAL TBK  
DAN ENTITAS ANAK**

**BOARD OF DIRECTORS' STATEMENT  
REGARDING  
THE RESPONSIBILITY FOR  
THE FINANCIAL STATEMENTS  
AS OF DECEMBER 31, 2021 AND  
FOR THE YEAR THEN ENDED  
PT BANK VICTORIA INTERNATIONAL TBK  
AND ITS SUBSIDIARIES**

Kami, yang bertanda tangan di bawah ini :

*We, the undersigned below:*

1. Nama	Ahmad Fajar	Name
Alamat kantor	Graha BIP Lantai 10, Jalan Gatot Subroto Kav. 23, Jakarta Selatan 12930	Office address
Alamat domisili atau sesuai KTP	Emerald View Blok A-09 Parigi, Pondok Aren, Kota Tangerang Selatan	Domicile address or address according to ID
Nomor telepon	021-522 8888	Telephone number
Jabatan	Direktur Utama	Title
2. Nama	Rusli	Name
Alamat kantor	Graha BIP Lantai 10, Jalan Gatot Subroto Kav. 23, Jakarta Selatan 12930	Office address
Alamat domisili atau sesuai KTP	Muara Karang Blok E.1 S No. 88, Pluit, Penjaringan, Kota Jakarta Utara	Domicile address or address according to ID
Nomor telepon	021-522-8888	Telephone number
Jabatan	Wakil Direktur Utama	Title

menyatakan bahwa:


*declare that:*

- |   |   |
|---|---|
| 1. Kami bertanggung jawab atas penyusunan dan penyajian laporan keuangan PT Bank Victoria International Tbk dan entitas anak;   | 1. <i>We are responsible for the preparation and presentation of the financial statements of PT Bank Victoria International Tbk and its subsidiaries;</i>   |
| 2. Laporan keuangan PT Bank Victoria International Tbk dan entitas anak telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia;                                      | 2. <i>The financial statements of PT Bank Victoria International Tbk and its subsidiaries have been prepared and presented in accordance with Indonesian Financial Accounting Standards;</i>                |
| 3. a. Semua informasi dalam laporan keuangan PT Bank Victoria International Tbk dan entitas anak telah dimuat secara lengkap dan benar; dan   | 3. a. <i>All information in the financial statements of PT Bank Victoria International Tbk and its subsidiaries have been fully disclosed in a complete and truthful manner; and</i>                        |
| b. Laporan keuangan PT Bank Victoria International Tbk dan entitas anak tidak mengandung informasi atau fakta material yang tidak benar, dan tidak menghilangkan informasi atau fakta material; | b. <i>The financial statements of PT Bank Victoria International Tbk and its subsidiaries do not contain any incorrect information or material fact, nor do they omit any information or material fact;</i> |
| 4. Kami bertanggung jawab atas sistem pengendalian internal dalam PT Bank Victoria International Tbk dan entitas anak.  | 4. <i>We are responsible for the internal control system of PT Bank Victoria International Tbk and its subsidiaries.</i>  |

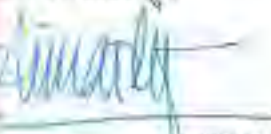
Demikian pernyataan ini dibuat dengan sebenarnya

*This statement is made truthfully*

Jakarta, 31 Maret 2022/Jakarta, March 31, 2022

  
**AHMAD FAJAR**  
Direktur Utama/President Director



  
**RUSLI**  
Wakil Direktur Utama/Vice President Director

The original consolidated financial statements included herein are in Indonesian language.

**PT BANK VICTORIA INTERNATIONAL Tbk  
DAN ENTITAS ANAKNYA  
LAPORAN KEUANGAN KONSOLIDASIAN  
TANGGAL 31 DESEMBER 2021  
DAN UNTUK TAHUN YANG BERAKHIR PADA  
TANGGAL TERSEBUT  
BESERTA LAPORAN AUDITOR INDEPENDEN**

**PT BANK VICTORIA INTERNATIONAL Tbk  
AND ITS SUBSIDIARIES  
CONSOLIDATED FINANCIAL STATEMENTS  
AS OF DECEMBER 31, 2021  
AND FOR THE YEAR THEN ENDED  
WITH INDEPENDENT AUDITORS' REPORT**

**Daftar Isi**

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#### Laporan Auditor Independen (lanjutan)

Laporan No. 00575/2.1032/AU.1/07/0242-  
1/1/III/2022 (lanjutan)

#### Tanggung jawab auditor (lanjutan)

Suatu audit melibatkan pelaksanaan prosedur untuk memperoleh bukti audit tentang angka-angka dan pengungkapan dalam laporan keuangan. Prosedur yang dipilih bergantung pada pertimbangan auditor, termasuk penilaian atas risiko kesalahan penyajian material dalam laporan keuangan, baik yang disebabkan oleh kecurangan maupun kesalahan. Dalam melakukan penilaian risiko tersebut, auditor mempertimbangkan pengendalian internal yang relevan dengan penyusunan dan penyajian wajar laporan keuangan entitas untuk merancang prosedur audit yang tepat sesuai dengan kondisinya, tetapi bukan untuk tujuan menyatakan opini atas keefektifan pengendalian internal entitas. Suatu audit juga mencakup pengevaluasian atas keefektifan kebijakan akuntansi yang digunakan dan kewajaran estimasi akuntansi yang dibuat oleh manajemen, serta pengevaluasian atas penyajian laporan keuangan secara keseluruhan.

Kami yakin bahwa bukti audit yang telah kami peroleh adalah cukup dan tepat untuk menyediakan suatu basis bagi opini audit kami.

#### Opini

Menurut opini kami, laporan keuangan konsolidasian terlampir menyajikan secara wajar, dalam semua hal yang material, posisi keuangan konsolidasian PT Bank Victoria International Tbk dan entitas anaknya tanggal 31 Desember 2021 serta kinerja keuangan dan arus kas konsolidasiannya untuk tahun yang berakhir pada tanggal tersebut, sesuai dengan Standar Akuntansi Keuangan di Indonesia.

#### Independent Auditors' Report (continued)

Report No. 00575/2.1032/AU.1/07/0242-  
1/1/III/2022 (continued)

#### Auditors' responsibility (continued)

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditors' judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditors consider internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

#### Opinion

In our opinion, the accompanying consolidated financial statements present fairly, in all material respects, the consolidated financial position of PT Bank Victoria International Tbk and its subsidiaries as of December 31, 2021 and its consolidated financial performance and cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.



Building a better  
working world

The original report included herein is in the Indonesian  
language.

#### Laporan Auditor Independen (lanjutan)

Laporan No. 00575/2.1032/AU.1/07/0242-  
1/1/III/2022 (lanjutan)

#### Hal-hal lain

Audit kami atas laporan konsolidasian PT Bank Victoria International Tbk dan entitas anaknya tanggal 31 Desember 2021 dan untuk tahun yang berakhir pada tanggal tersebut terlampir, dilaksanakan dengan tujuan untuk merumuskan suatu opini atas laporan keuangan konsolidasian secara keseluruhan. Informasi keuangan PT Bank Victoria International Tbk (entitas induk) terlampir, yang terdiri dari laporan posisi keuangan tanggal 31 Desember 2021, serta laporan laba rugi dan penghasilan komprehensif lain, laporan perubahan ekuitas, dan laporan arus kas untuk tahun yang berakhir pada tanggal tersebut (secara kolektif disebut sebagai "Informasi Keuangan Entitas Induk"), yang disajikan sebagai informasi tambahan terhadap laporan keuangan konsolidasian terlampir, disajikan untuk tujuan analisis tambahan dan bukan merupakan bagian dari laporan keuangan konsolidasian terlampir yang diharuskan menurut Standar Akuntansi Keuangan di Indonesia. Informasi Keuangan Entitas Induk merupakan tanggung jawab manajemen serta dihasilkan dari dan berkaitan secara langsung dengan catatan akuntansi dan catatan lainnya yang mendasarinya yang digunakan untuk menyusun laporan keuangan konsolidasian terlampir. Informasi Keuangan Entitas Induk telah menjadi objek prosedur audit yang diterapkan dalam audit atas laporan keuangan konsolidasian terlampir berdasarkan Standar Audit yang ditetapkan oleh Institut Akuntan Publik Indonesia. Menurut opini kami, Informasi Keuangan Entitas Induk disajikan secara wajar, dalam semua hal yang material, berkaitan dengan laporan keuangan konsolidasian terlampir secara keseluruhan.

#### Independent Auditors' Report (continued)

Report No. 00575/2.1032/AU.1/07/0242-  
1/1/III/2022 (continued)

#### Other matters

Our audit of the accompanying consolidated financial statements of PT Bank Victoria International Tbk and its subsidiaries as of December 31, 2021 and for the year then ended, was performed for the purpose of forming an opinion on such consolidated financial statements taken as a whole. The accompanying financial information of PT Bank Victoria International Tbk (parent entity), which comprises the statement of financial position as of December 31, 2021, and the statements of profit and loss and other comprehensive income, changes in equity, and cash flows for the year then ended (collectively referred to as the "Parent Entity Financial Information"), which is presented as a supplementary information to the accompanying consolidated financial statements, is presented for the purpose of additional analysis and is not a required part of the accompanying consolidated financial statements under Indonesian Financial Accounting Standards. The Parent Entity Financial Information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the accompanying consolidated financial statements. The Parent Entity Financial Information has been subjected to the auditing procedures applied in the audit of the accompanying consolidated financial statements in accordance with Standards on Auditing established by the Indonesian Institute of Certified Public Accountants. In our opinion, the Parent Entity Financial Information is fairly stated, in all material respects, in relation to the accompanying consolidated financial statements taken as a whole.

**Laporan Auditor Independen (lanjutan)**

Laporan No. 00575/2.1032/AU.1/07/0242-1/1/III/2022 (lanjutan)

**Hal-hal lain (lanjutan)**

Laporan keuangan konsolidasian PT Bank Victoria International Tbk dan entitas anaknya tanggal 31 Desember 2020 dan untuk tahun yang berakhir pada tanggal tersebut telah diaudit oleh auditor independen lain dengan laporan No. 00844/2.1025/AU.1/07/1124-2/1/IV/2021 tanggal 30 April 2021 yang menyatakan opini tanpa modifikasi atas laporan keuangan konsolidasian tersebut.

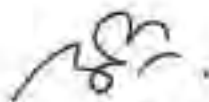
**Independent Auditors' Report (continued)**

Report No. 00575/2.1032/AU.1/07/0242-1/1/III/2022 (continued)

**Other matters (continued)**

The consolidated financial statements of PT Bank Victoria International Tbk and its subsidiaries as of December 31, 2020 and for the year then ended, were audited by other independent auditors whose report No. 00844/2.1025/AU.1/07/1124-2/1/IV/2021 dated April 30, 2021 expressed an unmodified opinion on such consolidated financial statements.

**Purwantono, Sungkoro & Surja**



Yovita

Registrasi Akuntan Publik No. AP.0242/Public Accountant Registration No. AP.0242

31 March 2022/ March 31, 2022





The original consolidated financial statements included herein are in Indonesian language.

**PT BANK VICTORIA INTERNATIONAL Tbk  
DAN ENTITAS ANAKNYA  
LAPORAN POSISI KEUANGAN  
KONSOLIDASIAN  
TANGGAL 31 DESEMBER 2021  
(Dinyatakan dalam ribuan Rupiah,  
kecuali dinyatakan lain)**

**PT BANK VICTORIA INTERNATIONAL Tbk  
AND ITS SUBSIDIARIES  
CONSOLIDATED STATEMENT OF  
FINANCIAL POSITION  
AS OF DECEMBER 31, 2021  
(Expressed in thousands of Rupiah,  
unless otherwise stated)**

	31 Desember 2021/ December 31, 2021	Catatan/ Notes	31 Desember 2020/ December 31, 2020	
<b>ASET</b>				<b>ASSETS</b>
Kas	53.929.444	2d,2i,4	61.723.223	Cash
Giro pada Bank Indonesia	663.113.716	2d,2j,5	612.623.334	Current accounts with Bank Indonesia
Giro pada bank lain	405.666.998	2d,2j,6	184.920.912	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank lain	763.852.298	2d,2g,2k,7	1.692.224.733	Placements with Bank Indonesia and other banks
Dikurangi: Cadangan kerugian penurunan nilai	(1.485.966)		-	Less: Allowance for impairment losses
	<u>762.366.332</u>		<u>1.692.224.733</u>	
Efek-efek	5.186.595.495	2d,2g,2l,8	6.416.334.165	Marketable securities
Dikurangi: Cadangan kerugian penurunan nilai	(11.108.843)		(9.663.323)	Less: Allowance for impairment losses
	<u>5.175.486.652</u>		<u>6.406.670.842</u>	
Efek-efek yang dibeli dengan janji dijual kembali	690.714.570	2d,2n,9	447.804.800	Securities purchased under resale agreement
Pendapatan bunga dan syariah yang masih akan diterima	364.693.547	2d,10	248.240.453	Interest and sharia income receivables
Biaya dibayar dimuka	14.454.526	2t,13	20.999.858	Prepaid expenses
Pinjaman yang diberikan, pembiayaan dan piutang syariah		2d,2g		Loans, sharia financing and receivables
- Pihak berelasi	219.052.277	2m,11	237.416.496	Related parties -
- Pihak ketiga	<u>15.270.022.134</u>		<u>14.605.937.802</u>	Third parties -
	<u>15.489.074.411</u>		<u>14.843.354.298</u>	
Dikurangi: Cadangan kerugian penurunan nilai	(702.273.753)		(597.378.266)	Less: Allowance for impairment losses
	<u>14.786.800.658</u>		<u>14.245.976.032</u>	
Penyertaan saham	34.887.238	2p,12	57.368.030	Investments in shares
Dikurangi: Cadangan kerugian penurunan nilai	(295)		(295)	Less: Allowance for impairment losses
	<u>34.886.943</u>		<u>57.367.735</u>	
Agunan yang diambil alih	1.436.697.691	2g,2s,15	1.645.774.259	Foreclosed assets
Dikurangi: Cadangan kerugian penurunan nilai	(282.641.086)		(278.062.370)	Less: Allowance for impairment losses
	<u>1.154.056.605</u>		<u>1.367.711.889</u>	
Aset pajak tangguhan - bersih	302.388.602	2ad,22c	250.488.701	Deferred tax assets - net
Aset tetap dan aset hak guna	599.481.845	2q,14	624.163.351	Fixed assets and right-of-use assets
Dikurangi: Akumulasi penyusutan	(91.362.497)		(64.489.997)	Less: Accumulated depreciation
	<u>508.119.348</u>		<u>559.673.354</u>	
Aset tak berwujud - bersih	3.194.176	2r,16	5.071.236	Intangible assets - net
Aset lain-lain	62.118.526	2t,17	70.683.254	Other assets
Dikurangi: Cadangan kerugian Penurunan nilai	(34.847.598)		(10.772.884)	Less: Allowance for impairment losses
	<u>27.270.928</u>		<u>59.910.370</u>	
<b>JUMLAH ASET</b>	<u><b>24.947.143.045</b></u>		<u><b>26.221.407.472</b></u>	<b>TOTAL ASSETS</b>

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to the consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

The original consolidated financial statements included herein are in Indonesian language.

**PT BANK VICTORIA INTERNATIONAL Tbk  
DAN ENTITAS ANAKNYA  
LAPORAN POSISI KEUANGAN  
KONSOLIDASIAN (lanjutan)  
TANGGAL 31 DESEMBER 2021  
(Dinyatakan dalam ribuan Rupiah,  
kecuali dinyatakan lain)**

**PT BANK VICTORIA INTERNATIONAL Tbk  
AND ITS SUBSIDIARIES  
CONSOLIDATED STATEMENT OF  
FINANCIAL POSITION (continued)  
AS OF DECEMBER 31, 2021  
(Expressed in thousands of Rupiah,  
unless otherwise stated)**

	31 Desember 2021/ December 31, 2021	Catatan/ Notes	31 Desember 2020/ December 31, 2020	
<b>LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS</b>				<b>LIABILITIES, TEMPORARY SYIRKAH FUND AND EQUITY</b>
<b>LIABILITAS</b>				<b>LIABILITIES</b>
Liabilitas segera	335.926	2u,18	2.086.598	<i>Obligations due immediately</i>
Simpanan nasabah		2v,19		<i>Deposit from customers</i>
- Pihak berelasi	712.301.379		273.574.500	<i>Related parties -</i>
- Pihak ketiga	<u>17.372.570.604</u>		<u>18.057.854.619</u>	<i>Third parties -</i>
	18.084.871.983		18.331.429.119	
Simpanan dari bank lain		2v,20		<i>Deposits from other banks</i>
- Pihak ketiga	1.037.173.068		2.060.970.040	<i>Third parties -</i>
Efek-efek yang diterbitkan	1.348.520.029	2x,21	1.544.029.002	<i>Securities issued</i>
Pinjaman dari bank lain	50.000.000	2y	-	<i>Borrowings</i>
Utang pajak		2ad,22a		<i>Taxes payable</i>
- Pajak penghasilan badan	-		-	<i>Corporate income tax -</i>
- Pajak lainnya	<u>12.584.904</u>		<u>21.618.668</u>	<i>Other taxes -</i>
	12.584.904		21.618.668	
Liabilitas imbalan kerja karyawan	43.884.161	2ae,24	58.499.231	<i>Employee benefits obligation</i>
Akrual dan liabilitas lain-lain	<u>124.855.488</u>	2d,23	<u>179.217.199</u>	<i>Accruals and other liabilities</i>
<b>JUMLAH LIABILITAS</b>	<b><u>20.702.225.559</u></b>		<b><u>22.197.849.857</u></b>	<b>TOTAL LIABILITIES</b>
<b>DANA SYIRKAH TEMPORER</b>				<b>TEMPORARY SYIRKAH FUND</b>
Simpanan nasabah		2w,25a		<i>Deposits from customers</i>
- Pihak berelasi	3.292.909		2.931.894	<i>Related parties -</i>
- Pihak ketiga	<u>1.218.699.403</u>		<u>1.321.750.467</u>	<i>Third parties -</i>
	1.221.992.312		1.324.682.361	
Simpanan dari bank lain		2w,25b		<i>Deposits from other banks</i>
- Pihak ketiga	<u>8.500.000</u>		<u>54.500.000</u>	<i>Third parties -</i>
<b>JUMLAH DANA SYIRKAH TEMPORER</b>	<b><u>1.230.492.312</u></b>		<b><u>1.379.182.361</u></b>	<b>TOTAL TEMPORARY SYIRKAH FUND</b>

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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**PT BANK VICTORIA INTERNATIONAL Tbk  
DAN ENTITAS ANAKNYA  
LAPORAN POSISI KEUANGAN  
KONSOLIDASIAN (lanjutan)  
TANGGAL 31 DESEMBER 2021  
(Dinyatakan dalam ribuan Rupiah,  
kecuali dinyatakan lain)**

**PT BANK VICTORIA INTERNATIONAL Tbk  
AND ITS SUBSIDIARIES  
CONSOLIDATED STATEMENT OF  
FINANCIAL POSITION (continued)  
AS OF DECEMBER 31, 2021  
(Expressed in thousands of Rupiah,  
unless otherwise stated)**

	31 Desember 2021/ December 31, 2021	Catatan/ Notes	31 Desember 2020/ December 31, 2020	
<b>LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS (lanjutan)</b>				<b>LIABILITIES, TEMPORARY SYIRKAH FUND AND EQUITY (continued)</b>
<b>EKUITAS</b>				<b>EQUITY</b>
<b>Ekuitas yang dapat diatribusikan kepada pemilik entitas induk</b>				<b>Equity attributable to equity holders of the parent entity</b>
Modal saham - nilai nominal				Share capital - par value
Rp100 (dalam Rupiah penuh) per saham				Rp100 (full amount) per share
Modal dasar - 14.000.000.000 saham pada				Authorised capital - 14,000,000,000 shares as of
31 Desember 2021 dan 2020				December 31, 2021 and 2020
Modal ditempatkan dan disetor penuh – 10.487.132.568 dan 8.951.947.039 saham pada tanggal				Issued and fully paid capital –
31 Desember 2021 dan 2020	1.048.713.257	26	895.194.704	10,487,132,568 and 8,951,947,039 shares as of December 31, 2021 and 2020
Tambahan modal disetor	407.785.927	27	282.775.419	Additional paid-in capital
Setoran modal diterima dimuka	278.000.000	27	-	Capital received in advance
Keuntungan yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	18.283.309	2d,2l	94.219.186	Unrealised gain on changes in fair value of marketable securities measured at fair value through other comprehensive income, net of tax
Surplus revaluasi aset tetap, setelah pajak	382.456.152	14	375.372.275	Gain on revaluation of fixed assets, net of tax
Pengukuran kembali atas liabilitas imbangan kerja, setelah pajak	20.973.059		19.535.593	Remeasurements on employee benefit liabilities, net of tax
Saldo laba:				Retained earnings:
- Telah ditentukan penggunaannya	186.356.165	29	186.356.165	Appropriated -
- Belum ditentukan penggunaannya	671.839.978		790.903.693	Unappropriated -
	858.196.143		977.259.858	
Kepentingan nonpengendali	17.327	2c,43	18.219	Non-controlling interest
<b>JUMLAH EKUITAS</b>	<b>3.014.425.174</b>		<b>2.644.375.254</b>	<b>TOTAL EQUITY</b>
<b>JUMLAH LIABILITAS, DANA SYIRKAH TEMPORER DAN EKUITAS</b>	<b>24.947.143.045</b>		<b>26.221.407.472</b>	<b>TOTAL LIABILITIES, TEMPORARY SYIRKAH FUND AND EQUITY</b>

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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**PT BANK VICTORIA INTERNATIONAL Tbk  
DAN ENTITAS ANAKNYA  
LAPORAN LABA RUGI DAN  
PENGHASILAN KOMPREHENSIF LAIN  
KONSOLIDASIAN  
Untuk Tahun Yang Berakhir Pada  
31 DESEMBER 2021  
(Dinyatakan dalam ribuan Rupiah,  
kecuali dinyatakan lain)**

**PT BANK VICTORIA INTERNATIONAL Tbk  
AND ITS SUBSIDIARIES  
CONSOLIDATED STATEMENT  
OF PROFIT OR LOSS AND  
OTHER COMPREHENSIVE INCOME  
For The Year Ended  
DECEMBER 31, 2021  
(Expressed in thousands of Rupiah,  
unless otherwise stated)**

Tahun yang Berakhir pada Tanggal 31 Desember/  
Year Ended December 31,

	2021	Catatan/ Notes	2020	
<b>PENDAPATAN DAN BEBAN OPERASIONAL</b>				<b>OPERATING INCOME AND EXPENSES</b>
Pendapatan bunga dan syariah	1.612.210.001	2aa,30	1.790.640.395	<i>Interest and sharia income</i>
Beban bunga dan syariah	<u>(1.148.555.785)</u>	2aa,31	<u>(1.600.981.946)</u>	<i>Interest and sharia expenses</i>
Pendapatan bunga dan syariah - bersih	<u>463.654.216</u>		<u>189.658.449</u>	<i>Interest and sharia income - net</i>
<b>PENDAPATAN DAN BEBAN OPERASIONAL LAINNYA</b>				<b>OTHER OPERATING INCOME AND EXPENSES</b>
Pendapatan operasional lainnya				<i>Other operating income</i>
Pendapatan dari investasi reksadana	21.743.876		83.949.209	<i>Income from investment in mutual funds</i>
Keuntungan atas penjualan efek-efek yang diukur pada nilai wajar melalui laba rugi dan penghasilan komprehensif lain - bersih	163.555.055	2d	274.360.713	<i>Gains on sale of securities measured at fair value through profit or loss and other comprehensive income - net</i>
Provisi dan komisi selain dari pinjaman	4.484.169	2ab	7.332.364	<i>Fees and commissions from transactions other than loans</i>
Kerugian yang belum terealisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui laba rugi - bersih	(304.026)	2d	(1.662.564)	<i>Unrealised loss on changes in fair value of securities measured at fair value through profit or loss - net</i>
Lain-lain	<u>264.450.269</u>	32	<u>127.025.565</u>	<i>Others</i>
Jumlah pendapatan operasional lainnya	<u>453.929.343</u>		<u>491.005.287</u>	<i>Total other operating income</i>
Beban operasional lainnya				<i>Other operating expenses</i>
Beban penyisihan kerugian penurunan nilai aset keuangan	(567.641.302)	2g,33	(358.961.727)	<i>Provision for impairment losses on financial assets</i>
Beban penyisihan kerugian penurunan nilai aset non-keuangan	(4.578.717)	2g,33	(109.717.512)	<i>Provision for impairment losses on non-financial assets</i>
Kerugian atas perubahan nilai wajar penyertaan saham yang diukur pada nilai wajar melalui laba rugi	(22.480.825)	2d	(28.826.492)	<i>Loss on changes in fair value of investment in shares measured at fair value through profit or loss</i>
Beban umum dan administrasi	(155.745.943)	2ac,34	(165.280.941)	<i>General and administrative expenses</i>
Beban tenaga kerja	(144.993.753)	2ac,35	(175.277.490)	<i>Personnel expenses</i>
Lain-lain	<u>(109.128.028)</u>	36	<u>(90.288.890)</u>	<i>Others</i>
Jumlah beban operasional lainnya	<u>(1.004.568.568)</u>		<u>(928.353.052)</u>	<i>Total other operating expenses</i>
<b>RUGI OPERASIONAL</b>	(86.985.009)		(247.689.316)	<b>LOSS FROM OPERATIONS</b>
<b>BEBAN NON OPERASIONAL - BERSIH</b>	<u>(63.883.139)</u>	37	<u>(50.543.184)</u>	<b>NON-OPERATING EXPENSE - NET</b>
<b>RUGI SEBELUM BEBAN PAJAK PENGHASILAN</b>	<b>(150.868.148)</b>		<b>(298.232.500)</b>	<b>LOSS BEFORE INCOME TAX EXPENSE</b>
MANFAAT PAJAK PENGHASILAN - BERSIH	<u>31.804.651</u>	2ad,22b	<u>46.038.810</u>	<b>INCOME TAX BENEFIT - NET</b>
<b>RUGI BERSIH TAHUN BERJALAN</b>	<b><u>(119.063.497)</u></b>		<b><u>(252.193.690)</u></b>	<b>NET LOSS FOR THE YEAR</b>

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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**PT BANK VICTORIA INTERNATIONAL Tbk  
DAN ENTITAS ANAKNYA  
LAPORAN LABA RUGI DAN  
PENGHASILAN KOMPREHENSIF LAIN  
KONSOLIDASIAN (Lanjutan)  
Untuk Tahun Yang Berakhir Pada  
31 Desember 2021  
(Dinyatakan dalam ribuan Rupiah,  
kecuali dinyatakan lain)**

**PT BANK VICTORIA INTERNATIONAL Tbk  
AND ITS SUBSIDIARIES  
CONSOLIDATED STATEMENT  
OF PROFIT OR LOSS AND  
OTHER COMPREHENSIVE INCOME (continued)  
For The Year Ended  
December 31, 2021  
(Expressed in thousands of Rupiah,  
unless otherwise stated)**

Tahun yang Berakhir pada Tanggal 31 Desember/  
Year Ended December 31,

	2021	Catatan/ Notes	2020	
<b>PENGHASILAN KOMPREHENSIF LAIN</b>				<b>OTHER COMPREHENSIVE INCOME</b>
<b>Pos-pos yang akan direklasifikasi ke laba rugi</b>				<b>Items that would be reclassified to profit or loss</b>
Perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	(90.857.607)	2d,2l	78.466.575	<i>Changes in fair value of marketable securities measured at fair value through other comprehensive income</i>
Pajak tangguhan terkait	14.920.624	22c	(14.746.328)	<i>Related deferred income tax</i>
	<u>(75.936.983)</u>		<u>63.720.247</u>	
<b>Pos yang tidak akan direklasifikasi ke laba rugi</b>				<b>Items that would never be reclassified to profit or loss</b>
Surplus revaluasi aset tetap	7.083.877	14	43.120.370	<i>Gain on revaluation of fixed assets</i>
Pajak penghasilan	-		(7.083.877)	<i>Income tax</i>
	<u>7.083.877</u>		<u>36.036.493</u>	
Pengukuran kembali atas liabilitas imbalan kerja	1.864.856	24	211.604	<i>Remeasurements on employee benefit liabilities</i>
Pajak tangguhan terkait	(427.394)	22c	216.783	<i>Related deferred income tax</i>
	<u>1.437.462</u>		<u>428.387</u>	
<b>(RUGI) PENGHASILAN KOMPREHENSIF LAIN, SETELAH PAJAK PENGHASILAN</b>	<u><b>(67.415.644)</b></u>		<u><b>100.185.127</b></u>	<b>OTHER COMPREHENSIVE (LOSS) INCOME, NET OF INCOME TAX</b>
<b>JUMLAH RUGI KOMPREHENSIF</b>	<u><b>(186.479.141)</b></u>		<u><b>(152.008.563)</b></u>	<b>TOTAL COMPREHENSIVE LOSS</b>
<b>Rugi bersih yang dapat diatribusikan kepada:</b>				<b>Net loss attributable to:</b>
Pemilik entitas induk	(119.063.715)		(252.193.680)	<i>Equity holders of the parent entity</i>
Kepentingan nonpengendali	218	2c,43	(10)	<i>Non-controlling interest</i>
	<u>(119.063.497)</u>		<u>(252.193.690)</u>	
<b>Rugi komprehensif yang dapat diatribusikan kepada:</b>				<b>Comprehensive loss attributable to:</b>
Pemilik entitas induk	(186.478.031)		(152.009.788)	<i>Equity holders of the parent entity</i>
Kepentingan nonpengendali	(1.110)	2c,43	1.225	<i>Non-controlling interest</i>
	<u><b>(186.479.141)</b></u>		<u><b>(152.008.563)</b></u>	
<b>RUGI BERSIH PER SAHAM YANG DAPAT DIATRIBUSIKAN KEPADA PEMILIK ENTITAS INDUK</b>				<b>LOSS PER SHARE ATTRIBUTABLE TO ENTITY HOLDERS OF THE PARENT ENTITY</b>
Dasar (Rupiah penuh)	(12,90)	2af,38	(28,17)	<i>Basic (full Rupiah)</i>
Dilusi (Rupiah penuh)	(12,90)	2af,38	(28,17)	<i>Diluted (full Rupiah)</i>

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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**PT BANK VICTORIA INTERNATIONAL Tbk  
DAN ENTITAS ANAKNYA  
LAPORAN PERUBAHAN EKUITAS  
KONSOLIDASIAN  
Untuk Tahun Yang Berakhir Pada  
31 Desember 2021  
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)**

**PT BANK VICTORIA INTERNATIONAL Tbk  
AND ITS SUBSIDIARIES  
CONSOLIDATED STATEMENT  
OF CHANGES IN EQUITY  
For The Year Ended  
December 31, 2021  
(Expressed in thousands of Rupiah, unless otherwise stated)**

Catatan/ Notes	Modal ditempatkan dan disetor penuh/ Issued and fully paid capital	Tambahannya modal disetor/ Additional paid-in capital	Setoran modal diterima dimuka/Capital received in advance	Keuntungan yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak tangguhan/ Unrealised gains on changes in fair value of marketable securities measured at fair value through other comprehensive income - net of tax	Surplus revaluasi aset tetap - setelah pajak/ Gain on revaluation of fixed assets - net of tax	Pengukuran kembali atas liabilitas imbalan kerja - setelah pajak/ Remeasurements on employee benefit liabilities - net of tax	Saldo laba/ Retained earnings		Kepentingan non pengendali/ Non- controlling interest	Jumlah ekuitas/ Total equity		
							Telah ditentukan penggunaannya/ Appropriated	Belum ditentukan penggunaannya/ Unappropriated				Jumlah/ Total
Saldo per 1 Januari 2021	895.194.704	282.775.419	-	94.219.186	375.372.275	19.535.593	186.356.165	790.903.693	2.644.357.035	18.219	2.644.375.254	Balance as of January 1, 2021
Dana setoran modal	26,27	153.518.553	126.274.397	278.000.000	-	-	-	-	557.792.950	-	557.792.950	Capital deposit fund Appropriation for general reserve
Biaya emisi efek	-	(1.263.889)	-	-	-	-	-	-	(1.263.889)	-	(1.263.889)	Other comprehensive income: Financial assets measured at fair value through other comprehensive income, net of tax
Penghasilan komprehensif lain: Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	-	-	-	(75.935.877)	-	-	-	-	(75.935.877)	(1.106)	(75.936.983)	Gain on revaluation of fixed asset net of tax
Surplus atas revaluasi aset tetap, setelah pajak	2q,14	-	-	-	7.083.877	-	-	-	7.083.877	-	7.083.877	Remeasurements on employee benefit liabilities, net of tax
Pengukuran kembali atas liabilitas imbalan kerja, setelah pajak	24	-	-	-	-	1.437.466	-	-	1.437.466	(4)	1.437.462	Net loss for the year
Rugi bersih tahun berjalan	-	-	-	-	-	-	-	(119.063.715)	(119.063.715)	218	(119.063.497)	
Saldo per 31 Desember 2021	1.048.713.257	407.785.927	278.000.000	18.283.309	382.456.152	20.973.059	186.356.165	671.839.978	3.014.407.847	17.327	3.014.425.174	Balance as of December 31, 2021

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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DAN ENTITAS ANAKNYA  
LAPORAN PERUBAHAN EKUITAS  
KONSOLIDASIAN (Lanjutan)  
Untuk Tahun Yang Berakhir Pada  
31 Desember 2021  
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)**

**PT BANK VICTORIA INTERNATIONAL Tbk  
AND ITS SUBSIDIARIES  
CONSOLIDATED STATEMENT  
OF CHANGES IN EQUITY (continued)  
For The Year Ended  
December 31, 2021  
(Expressed in thousands of Rupiah, unless otherwise stated)**

Catatan/ Notes	Modal ditempatkan dan disetor penuh/ Issued and fully paid capital	Tambahannya modal disetor/ Additional paid-in capital	Keuntungan yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak tanggungan/ Unrealised gains on changes in fair value of marketable securities measured at fair value through other comprehensive income - net of tax	Surplus revaluasi aset tetap - setelah pajak/ Gain on revaluation of fixed assets - net of tax	Pengukuran kembali atas liabilitas imbalan kerja - setelah pajak/ Remeasurements on employee benefit liabilities - net of tax	Saldo laba/ Retained earnings		Kepentingan non pengendali/ Non- controlling interest	Jumlah Total	Jumlah ekuitas/ Total equity	
						Telah ditentukan penggunaannya/ Appropriated	Belum ditentukan penggunaannya/ Unappropriated				
<b>Saldo per 1 Januari 2020</b>	895.194.704	282.775.419	30.500.208	339.335.782	19.107.162	186.356.165	1.233.168.159	2.986.437.599	17.004	2.986.454.603	<b>Balance as of January 1, 2020</b>
Dampak penerapan PSAK 71 dan 73 - bersih	-	-	-	-	-	-	(203.079.367)	(203.079.367)	-	(203.079.367)	Impact on implementation of SFAS 71 and 73 - net
Saldo per 1 Januari 2020 setelah dampak penerapan PSAK 71 dan 73	895.194.704	282.775.419	30.500.208	339.335.782	19.107.162	186.356.165	1.030.088.792	2.783.358.232	17.004	2.783.375.236	Balance as of 31 January 1, 2020 after impact on SFAS 71 and 73
Penghasilan komprehensif lain:											Other comprehensive income:
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	-	-	63.718.978	-	-	-	-	63.718.978	1.269	63.720.247	Financial assets measured at fair value through other comprehensive income, net of tax
Surplus atas revaluasi aset tetap, setelah pajak	2q,14	-	-	36.036.493	-	-	13.008.581	49.045.074	-	49.045.074	Gain on revaluation of fixed assets, net of tax
Pengukuran kembali atas liabilitas imbalan kerja, setelah pajak	24	-	-	-	428.431	-	-	428.431	(44)	428.387	Remeasurements on employee benefit liabilities, net of tax
Rugi bersih tahun berjalan	-	-	-	-	-	-	(252.193.680)	(252.193.680)	(10)	(252.193.690)	Net loss for the year
<b>Saldo per 31 Desember 2020</b>	<b>895.194.704</b>	<b>282.775.419</b>	<b>94.219.186</b>	<b>375.372.275</b>	<b>19.535.593</b>	<b>186.356.165</b>	<b>790.903.693</b>	<b>2.644.357.035</b>	<b>18.219</b>	<b>2.644.375.254</b>	<b>Balance as of December 31, 2020</b>

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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**PT BANK VICTORIA INTERNATIONAL Tbk  
DAN ENTITAS ANAKNYA  
LAPORAN ARUS KAS KONSOLIDASIAN  
Untuk Tahun Yang Berakhir  
31 Desember 2021  
(Dinyatakan dalam ribuan Rupiah,  
kecuali dinyatakan lain)**

**PT BANK VICTORIA INTERNATIONAL Tbk  
AND ITS SUBSIDIARIES  
CONSOLIDATED STATEMENT OF CASH FLOWS  
For The Year Ended  
December 31, 2021  
(Expressed in thousands of Rupiah,  
unless otherwise stated)**

	31 Desember 2021/ December 31, 2021	Catatan/ Notes	31 Desember 2020/ December 31, 2020	
<b>ARUS KAS DARI AKTIVITAS OPERASI</b>				<b>CASH FLOWS FROM OPERATING ACTIVITIES</b>
Penerimaan dari pendapatan bunga dan syariah dan komisi	1.402.170.315		1.673.182.422	Receipt from interest and sharia income and commissions
Pembayaran bunga dan syariah	(1.186.761.308)		(1.598.151.109)	Payment of interest and sharia expense
Penerimaan dari pendapatan operasional lainnya	487.522.798		530.881.460	Receipt from other operating income
Penerimaan dari penjualan agunan yang diambil alih	182.230.821		122.826.836	Receipt from sale of foreclosed assets
Pembayaran beban umum dan administrasi	(110.607.120)		(111.231.886)	Payment of general and administrative expenses
Pembayaran beban tenaga kerja	(158.001.914)		(184.009.617)	Payment of personnel expenses
Pembayaran beban operasional lainnya	(141.685.483)		(111.760.799)	Payments of other operating expenses
Pembayaran pendapatan non-operasional lainnya	8.725.791		3.750.837	Payment of other non-operating income
Pembayaran pajak penghasilan	-		(206.555)	Payment of income tax
Pembayaran pajak final atas revaluasi aset tetap	-		(376.412)	Payment of final tax on fix asset's revaluation
	483.593.900		324.905.177	
(Kenaikan)/penurunan dalam aset operasi:				(Increase)/decrease in operating assets:
Penempatan pada Bank Indonesia			20.000.000	Placements with Bank Indonesia
Pinjaman yang diberikan	(1.023.457.268)		2.201.160.624	Loans
Efek-efek yang dijual dengan janji dibeli kembali	-		1.114.234.518	Securities sales under repurchase agreements
Efek-efek yang dibeli dengan janji dijual kembali	(242.909.770)		552.201.091	Securities purchased under resale agreements
Beban dibayar dimuka	4.629.306		4.275.157	Prepaid expenses
Agunan yang diambil alih	(43.016.855)		(547.540.402)	Foreclosed assets
Penyertaan saham	(4.520.082)		214.606	Investments in shares
Aset hak guna	(2.502.853)		(36.758.774)	Right-of-use assets
Aset lain-lain	10.417.339		12.338.544	Other assets
Kenaikan/(penurunan) dalam kewajiban operasi:				Increase/(decrease) on operating liabilities:
Liabilitas segera	60.367		1.134.570	Obligations due immediately
Simpanan nasabah	(246.557.136)		(3.461.045.008)	Deposits from customers
Simpanan dari bank lain	(1.023.796.972)		1.151.996.088	Deposits from other banks
Pinjaman yang diterima	-		-	Loans from other bank
Utang pajak lainnya	(9.033.764)		(8.115.125)	Other tax payables
Efek-efek yang dijual dengan janji dibeli kembali	-		(1.000.000.721)	Securities sold under repurchase agreements
Liabilitas lain-lain	(1.074.242)		1.591.491	Other liabilities
Dana syirkah temporer	(148.690.049)		(308.507.985)	Temporary syirkah funds
<b>Arus kas bersih (digunakan untuk) diperoleh dari aktivitas operasi</b>	<b>(2.246.858.079)</b>		<b>22.083.851</b>	<b>Cash flow provided from/(used in) operating activities</b>
<b>ARUS KAS DARI AKTIVITAS INVESTASI</b>				<b>NET CASH FLOWS FROM INVESTING ACTIVITIES</b>
Hasil penjualan aset tetap	22.013.374	14	26.956.623	Proceeds from sale of fixed assets
Pembelian aset tetap	(1.118.686)	14	(2.686.526)	Purchase of fixed assets
Pembelian aset tak berwujud	(983.918)	16	(753.254)	Purchase of intangible assets
Surplus revaluasi aset tetap			(6.707.464)	Revaluation surplus of fixed assets
Penjualan/(pembelian) efek-efek	1.213.485.266		571.043.347	Sale/(purchase) of marketable securities
<b>Arus kas bersih diperoleh dari aktivitas investasi</b>	<b>1.233.396.036</b>		<b>587.852.726</b>	<b>Net cash flow provided from investing activities</b>

Catatan atas laporan keuangan konsolidasian merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to the consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

The original consolidated financial statements included herein are in Indonesian language.

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Untuk Tahun Yang Berakhir (lanjutan)  
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December 31, 2021  
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	31 Desember 2021/ December 31, 2021	Catatan/ Notes	31 Desember 2020/ December 31, 2020	
<b>ARUS KAS DARI AKTIVITAS PENDANAAN</b>				<b>CASH FLOWS FROM FINANCING ACTIVITIES</b>
Penambahan modal disetor	556.529.061		-	<i>Additional paid-in capital</i>
Penerbitan obligasi	-	21	60.000.000	<i>Bonds issuance</i>
Pinjaman yang diterima	50.000.000		-	<i>Loans received</i>
Pelunasan jatuh tempo obligasi	(200.000.000)	21	(300.000.000)	<i>Bonds repayment</i>
Pembayaran sewa	<u>(10.942.846)</u>		<u>(11.236.978)</u>	<i>Payment for lease</i>
<b>Arus kas bersih diperoleh dari (digunakan untuk) aktivitas pendanaan</b>	<b><u>395.586.215</u></b>		<b><u>(251.236.978)</u></b>	<b>Net cash flow provided from (used in) financing activities</b>
<b>KENAIKAN/(PENURUNAN) BERSIH KAS DAN SETARA KAS</b>	<b>(617.875.828)</b>		<b>358.699.599</b>	<b>NET INCREASE/(DECREASE) OF CASH AND CASH EQUIVALENT</b>
<b>KAS DAN SETARA KAS PADA AWAL TAHUN</b>	<b><u>2.504.438.284</u></b>		<b><u>2.145.738.685</u></b>	<b>CASH AND CASH EQUIVALENTS AT BEGINNING OF YEAR</b>
<b>KAS DAN SETARA KAS PADA AKHIR TAHUN</b>	<b><u><u>1.886.562.456</u></u></b>		<b><u><u>2.504.438.284</u></u></b>	<b>CASH AND CASH EQUIVALENTS AT END OF YEAR</b>
<b>Kas dan setara kas terdiri dari:</b>				<b>Cash and cash equivalent consist of:</b>
Kas	53.929.444	4	61.723.223	<i>Cash</i>
Giro pada Bank Indonesia	663.113.716	5	612.623.334	<i>Current accounts with Bank Indonesia</i>
Giro pada bank lain	405.666.998	6	184.920.912	<i>Current accounts with other banks</i>
Penempatan pada Bank Indonesia dan Bank lain dibawah 3 bulan	<u>763.852.298</u>	7b	<u>1.645.170.815</u>	<i>Placements with Bank Indonesia and other Banks less than 3 months</i>
<b>Jumlah kas dan setara kas</b>	<b><u><u>1.886.562.456</u></u></b>		<b><u><u>2.504.438.284</u></u></b>	<b>Total cash and cash equivalents</b>

Catatan atas laporan keuangan konsolidasian merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to the consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

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**1. INFORMASI UMUM**

**a. Pendirian dan informasi umum**

PT Bank Victoria International Tbk ("Bank") didirikan pada tanggal 28 Oktober 1992 berdasarkan Akta Notaris A. Partomuan Pohan, S.H., LL.M. No. 71 yang selanjutnya diadakan pembetulan dengan Akta No. 30 tanggal 8 September 1993 dari Notaris yang sama. Akta pendirian tersebut disahkan oleh Menteri Kehakiman Republik Indonesia melalui Surat Keputusan No. C2-4903.HT.01.01.TH 93 tanggal 19 September 1993 dan telah didaftarkan pada Kepaniteraan Pengadilan Negeri Jakarta Utara No.342/Leg/1993 tanggal 29 September 1993 serta telah diumumkan dalam Berita Negara Republik Indonesia No. 39, Tambahan No. 2602 tanggal 15 Mei 1998. Anggaran Dasar Bank telah beberapa kali mengalami perubahan, perubahan terakhir Anggaran Dasar dengan Akta No. 45 tanggal 26 Oktober 2018 yang dibuat dihadapan Fathiah Helmi, S.H., Notaris di Jakarta yang telah mendapat persetujuan dari Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-024249.AH.01.02. TH 2018 dan telah diterima dan dicatat dalam database Sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-AH.01.03-0260632 tanggal 5 November 2018.

Sesuai dengan pasal 3 anggaran dasar Bank, ruang lingkup kegiatan Bank adalah menjalankan usaha sebagai bank umum sesuai dengan ketentuan dan perundang-undangan yang berlaku. Bank mulai beroperasi secara komersial pada tanggal 5 Oktober 1994 sesuai dengan izin usaha yang diberikan oleh Menteri Keuangan Republik Indonesia dalam Surat Keputusan No. 402/KMK.017/1994 tanggal 10 Agustus 1994.

Bank telah mendapatkan izin menjadi bank devisa pada tanggal 13 Desember 2016 sesuai dengan Surat Kepala Departemen Perizinan dan Informasi Perbankan - Otoritas Jasa Keuangan No. S-423/PB.12/2016 dan efektif beroperasi menjadi bank devisa pada tanggal 20 Februari 2017. Bank memperoleh izin usaha sebagai pedagang valuta asing dari Bank Indonesia berdasarkan Surat No. 029/126/UOPM tanggal 25 Maret 1997.

**1. GENERAL INFORMATION**

**a. Establishment and general information**

*PT Bank Victoria International Tbk ("the Bank") was established on October 28, 1992 based on Notarial Deed No. 71 of A. Partomuan Pohan, S.H., LL.M., subsequently amended by Deed No. 30 dated September 8, 1993 from the same notary. The deed of establishment was approved by the Ministry of Justice of the Republic of Indonesia in its Decision Letter No. C2-4903.HT.01.01.TH 93 dated September 19, 1993 and was registered at the State Court Secretary in North Jakarta No. 342/Leg/1993 dated September 29, 1993 also was published in Supplement No. 2602 to the State Gazette of the Republic of Indonesia No. 39 dated May 15, 1998. The Bank's articles of association has been amended several times, and the latest was based on Notarial Deed No. 45 dated October 26, 2018 of Fathiah Helmi, S.H., a notary in Jakarta which has been approved by Ministry of Law and Human Rights of the Republic of Indonesia No. AHU-024249.AH.01.02.TH 2018 and has been accepted and recorded in database of Legal Entities Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia in its Letter No. AHU-AH.01.03-0260632 dated November 5, 2018.*

*According to article 3 of the Bank's articles of association, the scope of Bank's activities is to engage in commercial banking activities in accordance with the existing regulations. The Bank commenced its commercial operations on October 5, 1994 based on the operating license from the Ministry of Finance of the Republic of Indonesia in its Decision Letter No.402/KMK.017/1994 dated August 10, 1994.*

*Bank was approved as a foreign exchange bank on December 13, 2016 in accordance with Head of Licensing and Banking Information Department Letter - Financial Services Authority ("OJK") and effectively commenced as a foreign exchange bank on February 20, 2017. The Bank obtained a license as money changer from Bank Indonesia based on Letter No. 029/126/UOPM dated March 25, 1997.*

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**1. INFORMASI UMUM (lanjutan)**

**a. Pendirian dan informasi umum (lanjutan)**

Kantor Pusat Bank berlokasi di Graha BIP Lantai 10, Jalan Gatot Subroto Kav. 23 Jakarta. Bank memiliki kantor pusat, dengan kantor cabang utama, kantor cabang pembantu dan kantor kas sebagai berikut (tidak diaudit):

	31 Desember/ December 31,		
	2021	2020	
Kantor Pusat	1	1	Head Office
Kantor Cabang	14	14	Branches
Kantor Cabang Pembantu	25	38	Sub-Branches

**b. Penawaran umum saham dan penerbitan obligasi Bank**

**Penawaran umum saham**

Pada tanggal 4 September 1999, Bank memperoleh pernyataan efektif dari Ketua Badan Pengawas Pasar Modal (Bapepam) melalui Surat No. S-835/PM/1999 untuk melakukan penawaran umum perdana kepada masyarakat sejumlah 250.000.000 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (dalam Rupiah penuh) per saham dan sejumlah 80.000.000 Waran Seri I. Pada tanggal 30 September 1999, saham tersebut telah dicatatkan pada Bursa Efek Jakarta.

Pada tanggal 14 Agustus 2000, Bank memperoleh pernyataan efektif dari Ketua Bapepam melalui Surat No.S-2044/PM/2000 untuk melakukan Penawaran Umum Terbatas (PUT) I kepada para pemegang saham dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu sejumlah 614.000.000 saham dengan nilai nominal sebesar Rp100 (dalam Rupiah penuh) dan harga penawaran sebesar Rp115 (dalam Rupiah penuh) per saham dan sejumlah 85.960.000 Waran Seri II. Pada tanggal 28 September 2000, saham tersebut telah dicatatkan pada Bursa Efek Jakarta. Dari PUT I ini, jumlah yang diambil oleh pemegang saham yang berhak sejumlah 100.000.000 saham.

**1. GENERAL INFORMATION (continued)**

**a. Establishment and general information (continued)**

The Bank's Head Office is located at Graha BIP 10<sup>th</sup> Floor, Jalan Gatot Subroto Kav. 23 Jakarta. The Bank has operational head office and a number of branches, sub-branches and cash offices as follows (unaudited):

**b. Public offering of the Bank's shares and issuance of bonds**

**Public offering of shares**

On September 4, 1999, the Bank obtained an effective notification from the Chairman of the Capital Market Supervisory Agency (Bapepam) through Letter No. S-835/PM/1999 to conduct an initial public offering of 250,000,000 shares with a par value and an offering price of Rp100 (full amount) per share and 80,000,000 Series I Warrants. On September 30, 1999, the Bank's shares have been listed in Jakarta Stock Exchange.

On August 14, 2000, the Bank obtained an effective notification from the Chairman of Bapepam through Letter No. S-2044/PM/2000 to conduct Limited Public Offering (LPO) I to issue Preemptive Rights of 614,000,000 shares with a par value of Rp100 (full amount) and an offering price of Rp115 (full amount) per share and 85,960,000 Series II Warrants. On September 28, 2000, these shares had been listed in Jakarta Stock Exchange. From LPO I, the shares that were undertaken by the entitled shareholders was 100,000,000 shares.



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**1. INFORMASI UMUM (lanjutan)**

**b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)**

**Penawaran umum saham (lanjutan)**

Pada tanggal 21 Februari 2003, Bank memperoleh pernyataan efektif dari Ketua Bapepam melalui Surat No. S-36/PM/2003 untuk melakukan PUT II dengan Hak Memesan Efek Terlebih Dahulu sejumlah 705.243.360 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (dalam Rupiah penuh) per saham dan sejumlah 423.146.016 Waran Seri III.

Pada tanggal 20 Maret 2003, saham tersebut telah dicatatkan pada Bursa Efek Jakarta. Dari PUT II ini, jumlah yang diambil oleh pemegang saham yang berhak sejumlah 400.000.000 saham.

Pada tanggal 12 September 2006, Bank memperoleh pernyataan efektif dari Ketua Badan Pengawas Pasar Modal dan Lembaga Keuangan (Bapepam dan LK) melalui Surat No. S-452/BL/2006 untuk melakukan PUT III sejumlah 670.363.760 saham dengan nilai nominal sebesar Rp100 (dalam Rupiah penuh) dan harga penawaran sebesar Rp115 (dalam Rupiah penuh) per saham dan sebanyak-banyaknya 469.277.676 Waran Seri IV. Pada tanggal 13 Juli 2006, saham tersebut telah dicatatkan pada Bursa Efek Jakarta. Dari PUT III ini, jumlah yang diambil oleh pemegang saham yang berhak sejumlah 670.363.760 saham.

Pada tanggal 26 Juni 2008, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No.S-4114/BL/2008 untuk melakukan PUT IV sejumlah 1.167.498.560 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (dalam Rupiah penuh) per saham dan sejumlah 630.449.220 Waran Seri V.

Pada tanggal 17 September 2011, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-6737/BL/2011 untuk melakukan PUT V sejumlah 1.954.919.259 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (dalam Rupiah penuh) per saham dan sejumlah 1.448.939.990 Waran Seri VI.

**1. GENERAL INFORMATION (continued)**

**b. Public offering of the Bank's shares and issuance of bonds (continued)**

**Public offering of shares (continued)**

*On February 21, 2003, the Bank obtained an effective notification from the Chairman of Bapepam through Letter No. S-36/PM/2003 to conduct LPO II to issue Pre-emptive Rights of 705,243,360 shares with a par value and an offering price of Rp100 (full amount) per share and 423,146,016 Series III Warrants.*

*On March 20, 2003, these shares had been listed in Jakarta Stock Exchange. From LPO II, the shares that were undertaken by the entitled shareholders was 400,000,000 shares.*

*On September 12, 2006, the Bank obtained an effective notification from the Chairman of Capital Market and Financial Institutions Supervisory Agency (Bapepam and LK) through Letter No. S-452/BL/2006 to conduct LPO III of 670,363,760 shares with a par value of Rp100 (full amount) and an offering price of Rp115 (full amount) per share and 469,277,676 Series IV Warrants. On July 13, 2006, these shares had been listed in Jakarta Stock Exchange. From LPO III, the shares that were undertaken by the entitled shareholders was 670,363,760 shares.*

*On June 26, 2008, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-4114/BL/2008 to conduct LPO IV of 1,167,498,560 shares with a par value and an offering price of Rp100 (full amount) per share and 630,449,220 Series V Warrants.*

*On September 17, 2011, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-6737/BL/2011 to conduct LPO V of 1,954,919,259 shares with a par value and an offering price of Rp100 (full amount) per share and 1,448,939,990 Series VI Warrants.*

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**1. INFORMASI UMUM (lanjutan)**

**b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)**

**Penawaran umum saham (lanjutan)**

Berikut adalah kronologis jumlah modal saham yang ditempatkan dan disetor penuh serta saham yang dicatatkan pada bursa efek di Indonesia sejak Penawaran Umum Perdana sampai dengan tanggal 31 Desember 2021:

**1. GENERAL INFORMATION (continued)**

**b. Public offering of the Bank's shares and issuance of bonds (continued)**

**Public offering of shares (continued)**

The chronological overview of total issued and fully paid capital and shares listed at stock exchange in Indonesia from Initial Public Offering up to December 31, 2021 is as follows:

	<b>Jumlah saham/ Number of shares</b>	
Saham yang berasal dari Penawaran Umum Perdana pada tahun 1999	250.000.000	Shares from Initial Public Offering in 1999
Saham yang berasal dari pendiri	250.000.000	Founders' shares
Saham yang berasal dari kapitalisasi saldo laba	34.000.000	Shares from capitalisation of retained earnings
Saham yang berasal dari Penawaran Umum Terbatas I dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2000	100.000.000	Shares from Limited Public Offering with Preemptive Rights (Rights Issue) I in 2000
Saham yang berasal dari Pelaksanaan Waran Seri I dan II pada tahun 2002	66.793.400	Shares from Exercise of Series I and II Warrants in 2002
Saham yang berasal dari Penawaran Umum Terbatas II dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2003	400.000.000	Shares from Limited Public Offering with Preemptive Rights (Rights Issue) II in 2003
Saham yang berasal dari Pelaksanaan Waran Seri III pada tahun 2004	193.799.960	Shares from Exercise of Series III Warrants in 2004
Saham yang berasal dari Pelaksanaan Waran Seri III pada tahun 2006	46.200.000	Shares from Exercise of Series III Warrants in 2006
Saham yang berasal dari Penawaran Umum Terbatas III dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2006	670.363.760	Shares from Limited Public Offering with Preemptive Rights (Rights Issue) III in 2006
Saham yang berasal dari Pelaksanaan Waran Seri IV pada tahun 2007	323.840.000	Shares from Exercise of Series IV Warrants in 2007
Saham yang berasal dari Penawaran Umum Terbatas IV dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2008	1.167.498.560	Shares from Limited Public Offering with Preemptive Rights (Rights Issue) IV in 2008
Saham yang berasal dari Pelaksanaan Waran Seri IV dan V pada tahun 2009	344.244.500	Shares from Exercise of Series IV and V Warrants in 2009

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**1. INFORMASI UMUM (lanjutan)**

**b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)**

**Penawaran umum saham (lanjutan)**

Berikut adalah kronologis jumlah modal saham yang ditempatkan dan disetor penuh serta saham yang dicatatkan pada bursa efek di Indonesia sejak Penawaran Umum Perdana sampai dengan tanggal 31 Desember 2021: (lanjutan)

	<b>Jumlah saham/ Number of shares</b>	
Saham yang berasal dari Pelaksanaan Waran Seri IV dan V pada tahun 2010	249.707.135	Shares from Exercise of Series IV and V Warrants in 2010
Saham yang berasal dari Penawaran Umum Terbatas V dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2011	1.954.919.259	Shares from Limited Public Offering with Preemptive Rights (Rights Issue) V in 2011
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2011	414.580.000	Shares from Issuance of Shares without Preemptive Rights in 2011
Saham yang berasal dari Pelaksanaan Waran Seri IV dan V pada tahun 2011	81.724.314	Shares from Exercise of Series IV and V Warrants in 2011
Saham yang berasal dari Pelaksanaan Waran Seri V dan VI pada tahun 2012	56.673.554	Shares from Exercise of Series V and VI Warrants in 2012
Saham yang berasal dari Pelaksanaan Waran Seri V dan VI pada tahun 2013	25.923.831	Shares from Exercise of Series V and VI Warrants in 2013
Saham yang berasal dari Pelaksanaan Waran Seri VI pada tahun 2014	508.898.707	Shares from Exercise of Series VI Warrants in 2014
Saham yang berasal dari Pelaksanaan Waran Seri VI pada tahun 2015	300	Shares from Exercise of Series VI Warrants in 2015
Saham yang berasal dari Pelaksanaan Waran Seri VI pada tahun 2016	751.486.547	Shares from Exercise of Series VI Warrants in 2016
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada Tahun 2016	780.394.335	Shares from Exercise of Additional Shares Without Preemptive Rights in 2016
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada Tahun 2019	280.898.877	Shares from Exercise of Additional Shares Without Preemptive Rights in 2019
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada Tahun 2021	<u>1.535.185.529</u>	Shares from Exercise of Additional Shares Without Preemptive Rights in 2021
Jumlah modal saham yang ditempatkan dan disetor penuh	<u>10.487.132.568<sup>*)</sup></u>	Total issued and fully paid capital

<sup>\*)</sup> Jumlah modal saham yang ditempatkan dan disetor penuh termasuk 1% saham yang tidak diperdagangkan pada PT Bursa Efek Indonesia (*delisted*) sesuai ketentuan Peraturan Pemerintah RI No. 29 tahun 1999.

<sup>\*)</sup> Number of shares issued and fully paid includes 1% of delisted shares in the stock exchange in accordance with Government Regulation No. 29 Year 1999.

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**1. INFORMASI UMUM (lanjutan)**

**b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)**

**Penawaran umum obligasi**

Pada tanggal 28 Desember 1999, Bank memperoleh pernyataan efektif dari Ketua Bapepam melalui Surat No. S-2683/PM/1999 untuk melakukan penawaran umum Obligasi Bank Victoria I Tahun 2000 sejumlah Rp100.000.000. Pada tanggal 14 Maret 2000, Obligasi tersebut telah dicatatkan pada Bursa Efek Surabaya.

Pada tanggal 9 Maret 2007, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-1080/BL/2007 untuk melakukan penawaran umum Obligasi Bank Victoria II Tahun 2007 dan Obligasi Subordinasi Bank Victoria I Tahun 2007 masing-masing sejumlah Rp200.000.000. Pada tanggal 22 Maret 2007, Obligasi-obligasi tersebut telah dicatatkan pada Bursa Efek Indonesia.

Pada tanggal 19 September 2012, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-7574/BL/2012 untuk melakukan penawaran umum Obligasi Bank Victoria III Tahun 2012 dan Obligasi Subordinasi Bank Victoria II Tahun 2012 masing-masing sejumlah Rp200.000.000 dan Rp300.000.000. Pada tanggal 28 September 2012, Obligasi-obligasi tersebut telah dicatatkan pada Bursa Efek Indonesia.

Pada tanggal 21 September 2017, Bank memperoleh pernyataan efektif dari Dewan Komisiner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-340/D.04/2017 untuk melakukan penawaran umum Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 masing-masing sejumlah Rp300.000.000 dan Rp50.000.000. Pada tanggal 12 Juli 2017, Obligasi-obligasi tersebut telah dicatatkan pada Bursa Efek Indonesia.

**1. GENERAL INFORMATION (continued)**

**b. Public offering of the Bank's shares and issuance of bonds (continued)**

**Public offering of bonds**

*On December 28, 1999, the Bank obtained an effective notification from the Chairman of Bapepam through Letter No. S-2683/PM/1999 for the public offering of Bank Victoria Bonds I Year 2000 amounting to Rp100,000,000. On March 14, 2000, the Bonds had been listed in Surabaya Stock Exchange.*

*On March 9, 2007, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-1080/BL/2007 for the public offering of Bank Victoria Bonds II Year 2007 and Bank Victoria Subordinated Bonds I Year 2007, each amounting to Rp200,000,000. On March 22, 2007, the Bonds had been listed in Indonesian Stock Exchange.*

*On September 19, 2012, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-7574/BL/2012 for the public offering of Bank Victoria Bonds III Year 2012 and Bank Victoria Subordinated Bonds II Year 2012, amounting to Rp200,000,000 and Rp300,000,000, respectively. On September 28, 2012, the Bonds had been listed in Indonesian Stock Exchange.*

*On September 21, 2017, the Bank obtained the notice of effectivity from Financial Services Authority Board of Commissioner through Letter No. S-340/D.04/2017 for the public offering of Self Registration Bonds I Bank Victoria Phase I year 2017 and Subordinated Bonds I Bank Victoria Phase I Year 2017 in amount of Rp300,000,000 and Rp50,000,000, respectively. On July 12, 2017, these bonds were listed on the Indonesia Stock Exchange.*

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**1. INFORMASI UMUM (lanjutan)**

**b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)**

**Penawaran umum obligasi (lanjutan)**

Pada tanggal 5 September 2018 Bank melakukan Penawaran Umum Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018. Obligasi Berkelanjutan yang ditawarkan terdiri dari 2 (dua) seri Obligasi, yaitu Seri A sejumlah Rp100.000.000.000 dan Seri B sejumlah Rp200.000.000, sedangkan Obligasi Subordinasi sebesar Rp350.000.000 (lihat Catatan 22).

Pada tanggal 24 September 2019, Bank memperoleh pernyataan efektif dari Dewan Komisiner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-85/D.04/2019 untuk melakukan Penawaran Umum Berkelanjutan Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 serta telah dicatatkan pada Bursa Efek Indonesia 1 Juli 2019 masing-masing sejumlah Rp100.000.000 dan Rp250.000.000.

Pada tanggal 8 November 2019, Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 sebesar Rp150.000.000.

Pada tanggal 1 April 2020, Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 sebesar Rp60.000.000.

**c. Entitas Anak**

Bank merupakan pemegang saham pengendali dan memiliki pengaruh signifikan atas Entitas Anak sebagai berikut:

**1. GENERAL INFORMATION (continued)**

**b. Public offering of the Bank's shares and issuance of bonds (continued)**

**Public offering of bonds (continued)**

On September 5, 2018, Bank continues the Public Offering of Self Registration Bonds I Bank Victoria Phase II Year 2018 and Subordinated Bonds I Bank Victoria Phase II Year 2018. The Self Registration Bonds offered comprise of 2 (two) series, Series A amounted to Rp100,000,000 and Series B amounted to Rp200,000,000, while the Subordinated Bonds offered amounted to Rp350,000,000 (refer to Note 22).

On September 24, 2019, Bank obtained an effective notification from the Chairman of FSA through Letter No. S-85/D.04/2019 for continuous offering of Self Registration Bonds II Phase I Year 2019 and Bank Victoria Subordinated Bonds II Phase I Year 2019, which has been listed on the Indonesia Stock Exchange on July 1, 2019 amounting to Rp100,000,000 and Rp250,000,000, respectively.

On November 8, 2019, the Bank issued Bank Victoria Phase II Year II 2019 Continues Subordinated Bonds amounting to Rp150,000,000.

On April 1, 2020 the Bank issued Bank Victoria Phase III Year II 2020 Continues Subordinated Bonds amounting to Rp60,000,000.

**c. Subsidiaries**

The Bank is the controlling stockholder and has a significant control over the Subsidiaries as follows:

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**1. INFORMASI UMUM (lanjutan)**

**1. GENERAL INFORMATION (continued)**

**c. Entitas Anak (lanjutan)**

**c. Subsidiaries (continued)**

Entitas Anak/ <i>Subsidiary</i>	Jenis usaha/ <i>Nature of business</i>	Persentase kepemilikan/ <i>Percentage of ownership</i>	Tahun operasi komersial/ <i>Start of commercial operations</i>	Jumlah aset 31 Desember/ <i>Total assets December 31</i>	
				2021	2020
PT Bank Victoria Syariah	Sharia banking	99,99%	1966	1.658.424.256	2.296.026.685
<b>Reksadana / Mutual Funds:</b>					
Batavia Proteksi Andalan 7	Reksadana Terproteksi	100%	-	154.874.863	-
BNI AM Proteksi XL VIII	Reksadana Terproteksi	100%	-	103.825.989	-
Maybank Dana terproteksi 1	Reksadana Terproteksi	100%	-	44.196.171	-
Mega Dana terproteksi VIII	Reksadana Terproteksi	100%	-	42.719.039	-
Reksadana terproteksi Sucorinvest Proteksi 8	Reksadana Terproteksi	100%	-	101.028.049	-
Reksadana Terproteksi Mandiri 175	Reksadana Terproteksi	100%	-	103.168.694	-

Berdasarkan Akta Notaris Veronika Lily Dharma, S.H. No. 15 tanggal 7 September 2007, Notaris di Jakarta, Bank mengakuisisi 99,80% saham PT Bank Swaguna ("Entitas Anak"). Pada tanggal 13 Desember 2007, Bank melakukan penambahan modal di Entitas Anak sehingga kepemilikan Bank menjadi 99,98% sesuai dengan Akta Notaris Veronika Lily Dharma, S.H. No. 26 tanggal 13 Desember 2007.

*Based on Notarial Deed No. 15 dated September 7, 2007 of Veronika Lily Dharma, S.H., a Notary in Jakarta, the Bank acquired 99.80% shareholding of PT Bank Swaguna ("Subsidiary"). On December 13, 2007, the Bank had an additional capital in the Subsidiary which increased the Bank's ownership to 99.98% based on Notarial Deed No. 26 of Veronika Lily Dharma, S.H. dated December 13, 2007.*

Pada tanggal 30 September 2016, Bank melakukan penambahan modal pada Entitas Anak sebesar Rp50.000.000.000 (dalam Rupiah penuh) sehingga kepemilikan Bank menjadi 99,99% dan telah mendapatkan persetujuan OJK berdasarkan Surat No. S-151/PB.33/2016 tanggal 15 Agustus 2016.

*On September 30, 2016, the Bank put additional capital of Rp50,000,000,000 (full amount) into Subsidiary, which increase the Bank's ownership to 99.99% and obtained the approval from OJK based on Letter No. S-151/PB.33/2016 dated August 15, 2016.*

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**1. INFORMASI UMUM (lanjutan)**

**c. Entitas Anak (lanjutan)**

Pada tanggal 30 Maret 2017 dan 18 Desember 2017, setelah mendapatkan persetujuan OJK berdasarkan Surat No. S-33/PB.33/2017 tanggal 30 Maret 2017 dan No. S-170/PB.33/2017 tanggal 18 Desember 2017, Bank melakukan penambahan modal pada Entitas Anak sebesar Rp60.000.000.000 dan Rp40.000.000.000 (dalam Rupiah penuh) sehingga kepemilikan Bank menjadi 99,99%.

Pada tanggal 24 Oktober 2019, Bank melakukan penambahan modal pada Entitas Anak sebesar Rp50.000.000.000 (dalam Rupiah penuh) sehingga kepemilikan Bank menjadi 99,99% dan telah mendapatkan persetujuan OJK berdasarkan Surat No. S-53/PB.33/2019 tanggal 22 Oktober 2019.

Entitas Anak telah mengalami perubahan nama menjadi PT Bank Victoria Syariah sesuai dengan Akta No. 5 tanggal 6 Agustus 2009 dan Akta No. 24 tanggal 27 November 2009 dari Notaris Erni Rohaini, S.H., M.B.A., Notaris di Jakarta. Akta tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-02731.AH.01.02. Tahun 2010 tanggal 19 Januari 2010. Perubahan kegiatan usaha bank umum konvensional menjadi bank umum syariah telah mendapatkan izin dari Bank Indonesia berdasarkan Keputusan Gubernur Bank Indonesia No. 12/8/KEP.GBI/DPG/2010 tertanggal 10 Februari 2010. Selanjutnya, Entitas Anak beroperasi dengan prinsip Syariah mulai tanggal 1 April 2010.

**d. Dewan Komisaris dan Direksi, Komite dan Karyawan**

Susunan Dewan Komisaris dan Direksi Bank pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

**1. GENERAL INFORMATION (continued)**

**c. Subsidiaries (continued)**

On March 30, 2017 and December 18, 2017, after obtaining approval from OJK based on Letter No. S-33/PB.33/2017 dated March 30, 2017 and No. S-170/PB.33/2017 dated December 18, 2017, the Bank put additional capital of Rp60,000,000,000 and Rp40,000,000,000 (full amount) into Subsidiary, which increase the Bank's ownership to 99.99%.

On October 24, 2019, the Bank put additional capital of Rp50,000,000,000 (full amount) into Subsidiary, which increase the Bank's ownership to 99.99% and obtained the approval from OJK based on Letter No. S-53/PB.33/2019 dated October 22, 2019.

The Subsidiary changed its name to PT Bank Victoria Syariah based on Deed No. 5 dated August 6, 2009 and No. 24 dated November 27, 2009 of Erni Rohaini, S.H., M.B.A., a Notary in Jakarta. The notarial deed was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in its Decision Letter No. AHU-02731.AH.01.02 Year 2010 dated January 19, 2010. The changes of subsidiary's business from conventional banking to sharia banking was approved by Bank Indonesia based on the Decision of the Governor of Bank Indonesia No. 12/8/KEP.GBI/DPG/2010 dated February 10, 2010. The Subsidiary started its operations as a Sharia Bank on April 1, 2010.

**d. Boards of Commissioners and Directors, Committee and Employees**

The composition of the Bank's Boards of Commissioners and Directors as of December 31, 2021 and 2020 are as follows:



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**1. INFORMASI UMUM (lanjutan)**

**d. Dewan Komisaris dan Direksi, Komite dan Karyawan (lanjutan)**

	31 Desember/December 31,		
	2021	2020	
<b>Dewan Komisaris</b>			<b>Board of Commissioners</b>
Komisaris Utama Independen	Oliver Simorangkir	Oliver Simorangkir	President Commissioner
Komisaris/Komisaris Independen	Gunawan Tenggarahardja	Gunawan Tenggarahardja	Commissioner/Independent Commissioner
Komisaris/Komisaris Independen	Zaenal Abidin	Zaenal Abidin	Commissioner/Independent Commissioner
<b>Direksi</b>			<b>Board of Directors</b>
Direktur Utama	Ahmad Fajar	Ahmad Fajar	President Director
Wakil Direktur Utama	Rusli	Rusli	Vice President Director
Direktur	Debora Wahjutirto Tanoyo	Debora Wahjutirto Tanoyo	Director
Direktur Direktur Kepatuhan dan Manajemen Risiko	Lembing Tamunan	Lembing Tamunan	Director Risk Management and Compliance Director

Susunan Dewan Komisaris dan Direksi pada tanggal 31 Desember 2021 dan 2020 tersebut di atas telah diterima dan dicatat di dalam database Sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan Surat No. AHU-AH.01.03-0259894 tanggal 17 Mei 2019.

The composition of the Boards of Commissioners and Directors as of December 31, 2021 and 2020 had been accepted and recorded in the database of Legal Entities Administration System of the Ministry of Laws and Human Rights of the Republic of Indonesia in its Letter No. AHU-AH.01.03-0259894 dated May 17, 2019.

Susunan Komite Audit pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

The composition of the Audit Committee as of December 31, 2021 and 2020 are as follows:

	31 Desember/December 31,		
	2021	2020	
Ketua	Gunawan Tenggarahardja	Gunawan Tenggarahardja	Chairman
Anggota Anggota	Yozef Abdulrachman Medi Sejati	Yozef Abdulrachman Retno Dwijanti Widaningsih*)	Member Member

Pembentukan Komite Audit Bank telah sesuai dengan Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 tanggal 23 Desember 2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit dan Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 tanggal 7 Desember 2016 tentang Penerapan Tata Kelola Bagi Bank Umum.

Establishment of the Bank's Audit Committee is in compliance with Financial Service Authority regulation No. 55/POJK.04/2015 dated December 23, 2015 regarding Establishment and Guideline for Implementation Duty of Audit Committee and Financial Service Authority regulation No. 55/POJK.03/2016 dated December 7, 2016 regarding Governance Implementation in Commercial Bank.

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**1. INFORMASI UMUM (lanjutan)**

**d. Dewan Komisaris dan Direksi, Komite dan Karyawan (lanjutan)**

Susunan Komite Pemantau Risiko pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

	31 Desember/December 31,		
	2021	2020	
Ketua	Zaenal Abidin	Zaenal Abidin	Chairman
Anggota	Oliver Simorangkir	Oliver Simorangkir	Member
Anggota	Yozef Abdulrachman	Yozef Abdulrachman	Member
Anggota	Medi Sejati	Retno Dwijanti Widaningsih*)	Member

\*) Retno Dwijanti Widaningsih telah mengajukan pengunduran diri dan telah efektif berhenti sejak tanggal 9 April 2021 sesuai dengan Surat Keputusan Komisaris No. 001/SK-KOM/04/21.

The composition of the Risk Monitoring Committee as of December 31, 2021 and 2020 are as follows:

\*) Retno Dwijanti Widaningsih has submitted her resignation and has been effective since April 9, 2021 based on Commissioner Decree Letter No. 001/SK-KOM/04/21.

Susunan Komite Nominasi dan Remunerasi pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

	31 Desember/December 31,		
	2021	2020	
Ketua	Gunawan	Gunawan	Chairman
Anggota	Tenggarahardja	Tenggarahardja	Member
Anggota	Oliver Simorangkir	Oliver Simorangkir	Member
Anggota	Syahda Chandra	Syahda Chandra	Member

The composition of the Nomination and Remuneration Committee as of December 31, 2021 and 2020 are as follows:

Sekretaris Perusahaan dan Kepala Internal Audit pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

	31 Desember/December 31,		
	2021	2020	
Sekretaris Perusahaan	Caprie Ardira Azhar	Lidwina Dian Pratiwi	Corporate Secretary
Kepala Internal Audit	Djoko Soenjojo	Djoko Soenjojo	Internal Audit Head

The Corporate Secretary and Internal Audit Head as of December 31, 2021 and 2020 are as follows:

Pada tanggal 31 Desember 2021 dan 2020, Bank memiliki karyawan masing-masing sejumlah 694 dan 799 karyawan (tidak diaudit).

As of December 31, 2021 and 2020, the Bank had 694 and 799 employees, respectively (unaudited).

**e. Pemegang saham akhir**

Pemegang saham akhir Bank pada tanggal 31 Desember 2021 dan 2020 adalah Suzanna Tanojo.

**e. Ultimate shareholders**

The ultimate shareholder of the Bank as of December 31, 2021 and 2020 is Suzanna Tanojo.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN**

Laporan keuangan konsolidasian PT Bank Victoria International Tbk dan Entitas Anak ("Grup") telah diotorisasi oleh Direksi pada tanggal 31 Maret 2022.

Kebijakan akuntansi utama yang diterapkan dalam penyusunan laporan keuangan konsolidasian adalah seperti dijabarkan di bawah ini:

**a. Dasar penyusunan laporan keuangan konsolidasian**

Laporan keuangan konsolidasian disusun sesuai dengan Standar Akuntansi Keuangan di Indonesia yang dikeluarkan oleh Ikatan Akuntan Indonesia. Laporan keuangan konsolidasian juga disusun sesuai dengan Keputusan Ketua Bapepam-LK (sekarang Otoritas Jasa Keuangan atau OJK) No. KEP-347/BL/2012 tanggal 25 September 2012 yang merupakan perubahan terakhir atas Keputusan Ketua Bapepam-LK No. KEP 554/BL/2010 tanggal 30 Desember 2010 dan Keputusan Ketua Bapepam-LK No. KEP-06/PM/2000 tanggal 13 Maret 2000 yaitu Peraturan No. VIII.G.7 tentang "Pedoman Penyajian Laporan Keuangan" serta Surat Edaran Ketua Bapepam-LK No. SE-02/BL/2008 tentang "Pedoman Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik Industri Pertambangan Umum, Minyak dan Gas Bumi, dan Perbankan" tanggal 31 Januari 2008.

Laporan keuangan konsolidasian disusun berdasarkan harga perolehan kecuali untuk aset keuangan yang diukur pada nilai wajar melalui pendapatan komprehensif lain ("FVOCI") dan aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi ("FVTPL"). Laporan keuangan konsolidasian disusun berdasarkan akuntansi berbasis akrual, kecuali untuk laporan arus kas konsolidasian.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

The consolidated financial statements of PT Bank Victoria International Tbk and its Subsidiaries ("the Group") were authorised by the Board of Directors on March 31, 2022.

The principal accounting policies adopted in preparing the consolidated financial statements are set out below:

**a. Basis of preparation of the consolidated financial statements**

The consolidated financial statements were prepared in accordance with Indonesian Financial Accounting Standards issued by the Indonesian Institute of Accountants. The consolidated financial statements have also been prepared in accordance with the Decree of Bapepam-LK (now Financial Services Authority or OJK) No. KEP-347/BL/2012 dated September 25, 2012 which is the latest change of the Decree of the Bapepam-LK No. KEP 554/BL/2010 dated December 30, 2010 and the Decree of the Bapepam-LK No. KEP-06/PM/2000 dated March 13, 2000 on Regulation No. VIII.G.7 regarding "Financial Statements Presentation Guidelines" and Circular Letter of Chairman of the Bapepam-LK No. SE-02/BL/2008 regarding "Guidelines for Financial Statements Preparation and Presentation of Public Company in General Mining, Oil and Gas Industry and Banking Industry" dated January 31, 2008.

The consolidated financial statements have been prepared under the historical cost convention, except for financial assets measure as fair value through other comprehensive income ("FVOCI") and financial assets held at fair value through profit or loss ("FVTPL"). The consolidated financial statements are prepared under the accrual basis of accounting, except for the consolidated statement of cash flows.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**a. Dasar penyusunan laporan keuangan konsolidasian (lanjutan)**

Laporan keuangan untuk Entitas Anak yang bergerak di bidang Syariah, disusun berdasarkan Pernyataan Standar Akuntansi Keuangan (PSAK) 101 (Revisi 2016) "Penyajian Laporan Keuangan Syariah", PSAK 102 (Revisi 2019) "Akuntansi Murabahah", PSAK 104 (Revisi 2016), "Akuntansi Istishna", PSAK 105, "Akuntansi Mudharabah", PSAK 106, "Akuntansi Musyarakah", PSAK 107 (Revisi 2016), "Akuntansi Ijarah", PSAK 110 (Revisi 2015) "Akuntansi Sukuk", PSAK 111, "Akuntansi Wa'd", Pedoman Akuntansi Perbankan Syariah Indonesia ("PAPSI"), dan Standar Akuntansi Keuangan di Indonesia, termasuk pedoman akuntansi dan pelaporan yang ditetapkan oleh Otoritas Jasa Keuangan ("OJK").

Seluruh angka dalam laporan keuangan konsolidasian ini, kecuali dinyatakan secara khusus, dibulatkan menjadi dan disajikan dalam ribuan Rupiah yang terdekat.

Laporan arus kas konsolidasian disusun dengan menggunakan metode langsung dengan mengelompokkan arus kas dalam aktivitas operasi, investasi dan pendanaan. Untuk tujuan laporan arus kas konsolidasian, kas dan setara kas mencakup kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, dan Sertifikat Bank Indonesia yang jatuh tempo dalam 3 (tiga) bulan atau kurang sejak tanggal perolehan yang tidak dijaminkan atau dibatasi penggunaannya.

Penyusunan laporan keuangan konsolidasian sesuai dengan Standar Akuntansi Keuangan di Indonesia mengharuskan penggunaan estimasi dan asumsi. Hal tersebut juga mengharuskan manajemen untuk membuat pertimbangan dalam proses penerapan kebijakan akuntansi Grup. Area yang kompleks atau memerlukan tingkat pertimbangan yang lebih tinggi atau area di mana asumsi dan estimasi dapat berdampak signifikan terhadap laporan keuangan konsolidasian diungkapkan di Catatan 3.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**a. Basis of preparation of the consolidated financial statements (continued)**

The financial statements of a Subsidiary company engaged in sharia banking are prepared under the Statement of Financial Accounting Standard (SFAS) 101 (Revised 2016) "Presentation of Sharia Financial Statement", SFAS 102 (Revised 2019), "Murabahah Accounting", SFAS 104 (Revised 2016), "Istishna Accounting", SFAS 105, "Mudharabah Accounting", SFAS 106, "Musyarakah Accounting", SFAS 107 (Revised 2016), "Ijarah Accounting", SFAS 110 (Revised 2015) "Sukuk Accounting", SFAS 111, "Wa'd Accounting", Accounting Guidelines for Indonesian Sharia Banking ("PAPSI"), and Indonesian Financial Accounting Standards, including accounting and reporting guidance issued by Financial Service Authority ("OJK").

All figures in the consolidated financial statements are rounded to and stated in thousands of Rupiah, unless otherwise stated.

The consolidated statement of cash flows were prepared based on the direct method with cash flows classified into cash flows from operating, investing and financing activities. For the purpose of the consolidated statement of cash flows, cash and cash equivalents include cash, current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks, and Certificates of Bank Indonesia maturing within 3 (three) months or less from the date of acquisition and are not pledged or restricted.

The preparation of consolidated financial statements in accordance with Indonesian Financial Accounting Standards requires the use of estimates and assumptions. It also requires management to make judgements in the process of implementing the Group's accounting policies. The area that is complex or requires a higher level of consideration or areas where assumptions and estimates could have a significant impact on the consolidated financial statements are disclosed in Note 3.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**b. Perubahan kebijakan akuntansi yang signifikan**

Pada tanggal 1 Januari 2021, terdapat standar baru dan penyesuaian atau amendemen terhadap beberapa standar yang masih berlaku dan berlaku efektif sejak tanggal tersebut yaitu sebagai berikut:

- Amendemen PSAK 71 "Instrumen Keuangan: tentang Fitur Percepatan Pelunasan dengan Kompensasi Negatif";
- Amendemen PSAK 73 "Sewa" tentang konsesi sewa terkait COVID-19;
- Amendemen PSAK 102 "Akuntansi Murabahah";
- Penyesuaian tahunan 2019 terhadap PSAK 1 "Penyajian Laporan Keuangan";
- ISAK 35 "Penyajian Laporan Keuangan Entitas Berorientasi Nirlaba";
- ISAK 101 "Pengakuan Pendapatan Murabahah Tanggung Tanpa Risiko Signifikan Terkait Kepemilikan Persediaan";
- ISAK 102 "Penurunan Nilai Piutang Murabahah";
- PPSAK 13 Pencabutan PSAK 45 Laporan Keuangan Entitas Nirlaba; dan
- Amendemen Kerangka Konseptual Pelaporan Keuangan.

Implementasi dari standar-standar tersebut tidak menghasilkan perubahan substansial terhadap kebijakan akuntansi Grup dan tidak memiliki dampak yang material terhadap laporan keuangan konsolidasian di tahun berjalan atau tahun sebelumnya.

**c. Prinsip konsolidasi**

Laporan keuangan konsolidasian meliputi laporan keuangan Bank beserta seluruh Entitas Anak yang berada di bawah pengendalian Bank. Entitas Anak adalah entitas (termasuk entitas terstruktur) dimana Bank memiliki pengendalian. Bank mengendalikan entitas lain ketika Bank terekspos atas, atau memiliki hak atas imbal hasil variabel dari keterlibatannya dengan Entitas Anak dan memiliki kemampuan untuk mempengaruhi imbal hasil tersebut melalui kekuasaannya atas Entitas Anak.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**b. Change in significant accounting policies**

On January 1, 2021 there were new standards and adjustments or amendments for several prevailing standards and effective since that date, as follows:

- Amendment to SFAS 71 "Financial Instruments: Prepayment Features with Negative Compensation";
- Amendment to SFAS 73 "Leases" related to COVID-19 rent concessions;
- Amendment SFAS 102 "Accounting for Murabahah";
- Annual improvements 2019 to SFAS 1 "Presentation of Financial Statements";
- IFAS 35 "Presentation of Non-Profit Oriented Entities Financial Statements";
- IFAS 101 "Recognition of Deferred Murabahah Income without Significant Inventory Ownership Risks";
- IFAS 102 "Impairment of Murabahah Receivables";
- PPSAK 13 Revocation of SFAS 45 Financial Reporting for Non-profit Organisations; and
- Amendment to Conceptual Framework for Financial Reporting.

The implementation of the above standards did not result in substantial changes to the Group's accounting policies and had no material impact to the consolidated financial statements for current year or prior financial years.

**c. Basis of consolidation**

The consolidated financial statements include the financial statements of the Bank and its Subsidiaries that are controlled by the Bank. Subsidiaries are all entities (including structured entities) over which the Bank has control. The Bank controls an entity when the Bank is exposed to, or has rights to, variable returns from its involvement with the Subsidiary and has the ability to affect those returns through its power over the Subsidiary.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**c. Prinsip konsolidasi (lanjutan)**

Laporan keuangan dari Entitas Anak dimasukkan ke dalam laporan keuangan konsolidasian sejak tanggal pengendalian dimulai sampai dengan tanggal pengendalian berakhir.

Dampak signifikan dari seluruh transaksi dan saldo antara perusahaan-perusahaan yang dikonsolidasikan telah dieliminasi dalam penyajian laporan keuangan konsolidasian, sehingga laporan keuangan konsolidasian hanya mencakup transaksi dan saldo dengan pihak lain.

Kebijakan akuntansi penting yang dipakai dalam penyajian laporan keuangan konsolidasian telah diterapkan secara konsisten oleh Grup, kecuali dinyatakan secara khusus.

Kepentingan nonpengendali disajikan di ekuitas dalam laporan posisi keuangan konsolidasian dan dinyatakan sebesar proporsi pemegang saham nonpengendali atas laba tahun berjalan dan ekuitas Entitas Anak tersebut berdasarkan persentase kepemilikan pemegang saham nonpengendali pada Entitas Anak tersebut.

Dalam hal pengendalian terhadap Entitas Anak dimulai atau diakhiri dalam suatu tahun berjalan, maka hasil usaha Entitas Anak yang diperhitungkan ke dalam laporan keuangan konsolidasian hanya sebatas hasil pada saat pengendalian tersebut mulai diperoleh atau hingga saat pengendalian itu berakhir.

**d. Aset dan liabilitas keuangan**

**(i) Aset keuangan**

Sesuai dengan PSAK 71, terdapat tiga klasifikasi pengukuran aset keuangan:

- (A) Biaya perolehan diamortisasi;
- (B) Diukur pada nilai wajar melalui laba rugi ("FVTPL"); dan
- (C) Diukur pada nilai wajar melalui penghasilan komprehensif lain ("FVOCI").

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**c. Basis of consolidation (continued)**

The financial statements of Subsidiary are included in the consolidated financial statements from the date on which control commences until the date when control ceases.

The significant effects of all transactions and balances between the consolidated companies have been eliminated in preparing the consolidated financial statements, accordingly, the consolidated financial statements include only transactions and balances with other parties.

The significant accounting policies adopted in preparing the consolidated financial statements have been consistently applied by Group, unless otherwise stated.

Non-controlling interest is presented as part of equity in the consolidated statements of financial position and represents the non-controlling shareholders' proportionate share in the net income for the year and equity of the Subsidiary based on the percentage of ownership of the non-controlling shareholders in the Subsidiary.

Where Subsidiary either began or ceased to be controlled during the year, the results of operations of those Subsidiaries are included in the consolidated financial statements only from the date that the control has commenced or up to the date that the control has ceased.

**d. Financial assets and liabilities**

**(i) Financial assets**

In accordance with SFAS 71, there are three measurement classifications for financial assets:

- (A) Amortised cost;
- (B) Fair value through profit or loss ("FVTPL"); and
- (C) Fair value through other comprehensive income ("FVOCI").

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG  
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**d. Aset dan liabilitas keuangan (lanjutan)**

**(i) Aset keuangan (lanjutan)**

Aset keuangan diklasifikasikan menjadi kategori tersebut di atas berdasarkan model bisnis dimana aset keuangan tersebut dimiliki dan karakteristik arus kas kontraktualnya. Model bisnis merefleksikan bagaimana kelompok aset keuangan dikelola untuk mencapai tujuan bisnis tertentu.

Aset keuangan dapat diukur dengan biaya perolehan diamortisasi hanya jika memenuhi kedua kondisi berikut dan tidak ditetapkan sebagai FVTPL:

- Aset keuangan dikelola dalam model bisnis yang bertujuan untuk memiliki aset keuangan untuk tujuan mendapatkan arus kas kontraktual (*held to collect*); dan
- Kriteria kontraktual dari aset keuangan yang pada tanggal tertentu menghasilkan arus kas yang merupakan pembayaran pokok dan bunga semata ("SPPI") dari jumlah pokok terutang.

Suatu aset keuangan diukur pada FVOCI, hanya jika memenuhi kedua kondisi berikut dan tidak ditetapkan sebagai FVTPL:

- Aset keuangan dikelola dalam model bisnis yang tujuan tercapai dengan mendapatkan arus kas kontraktual dan menjual aset keuangan (*held to collect and sell*); dan
- Kriteria kontraktual dari aset keuangan yang pada tanggal tertentu menghasilkan arus kas yang merupakan pembayaran pokok dan bunga semata dari jumlah pokok terutang.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**d. Financial assets and liabilities (continued)**

**(i) Financial assets (continued)**

Financial assets are classified into these categories based on the business model within which they are held and their contractual cash flow characteristics. The business model reflects how groups of financial assets are managed to achieve a particular business objective.

A financial asset is measured at amortised cost only if it meets both of the following conditions and it is not designated as at FVTPL:

- The financial assets is held within a business model whose objective is to hold the asset to collect contractual cash flows (*held to collect*); and
- Its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest ("SPPI") on the principal amount outstanding.

A financial asset measured at FVOCI only if it meets both of the following conditions and is not designated as at FVTPL:

- The financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling the financial asset (*held to collect and sell*); and
- Its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.



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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG  
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**d. Aset dan liabilitas keuangan (lanjutan)**

**(i) Aset keuangan (lanjutan)**

Seluruh aset keuangan yang tidak diklasifikasikan sebagai diukur dengan biaya perolehan diamortisasi atau FVOCI sebagaimana ketentuan di atas diukur dengan FVTPL.

Aset dapat dijual dari portofolio *held to collect* ketika terdapat peningkatan risiko kredit. Penghentian untuk alasan lain diperbolehkan namun jumlah penjualan tersebut harus tidak signifikan jumlahnya atau tidak sering.

Laba rugi yang belum direalisasi atas aset keuangan yang diklasifikasikan sebagai FVOCI ditangguhkan di pendapatan komprehensif lain sampai aset tersebut dihentikan.

Aset keuangan dapat ditetapkan sebagai FVTPL hanya jika ini dapat mengeliminasi atau mengurangi *accounting mismatch*.

**Penilaian apakah arus kas kontraktual hanya merupakan pembayaran pokok dan bunga semata**

Untuk tujuan penilaian ini, 'pokok' didefinisikan sebagai nilai wajar dari aset keuangan pada pengakuan awal. 'Bunga' didefinisikan sebagai imbalan untuk nilai waktu atas uang dan untuk risiko kredit yang terkait dengan jumlah pokok yang terutang selama periode waktu tertentu dan untuk risiko dan biaya pinjaman dasar lainnya (misalnya risiko likuiditas dan biaya administrasi), serta margin keuntungan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**d. Financial assets and liabilities (continued)**

**(i) Financial assets (continued)**

All financial assets not classified as measured at amortised cost or FVOCI as described above are measured at FVTPL.

Assets may be sold out of held to collect portfolios where there is an increase in credit risk. Disposals for other reasons are permitted but such sales should be insignificant in value or infrequent in nature.

Unrealised gains or losses of financial assets held at FVOCI deferred in other comprehensive income until the asset is derecognised.

Financial assets may be designated at FVTPL only if doing so eliminates or reduces accounting mismatch.

**Assessment of whether contractual cash flows are solely payments of principal and interest**

For the purposes of this assessment, 'principal' is defined as the fair value of the financial asset on initial recognition. 'Interest' is defined as consideration for the time value of money and for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs (e.g. liquidity risk and administrative costs), as well as profit margin.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG  
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**d. Aset dan liabilitas keuangan (lanjutan)**

**(i) Aset keuangan (lanjutan)**

Dalam menilai apakah arus kas kontraktual adalah SPPI, Bank mempertimbangkan ketentuan kontraktual instrumen tersebut. Hal ini termasuk menilai apakah aset keuangan mengandung ketentuan kontraktual yang dapat mengubah waktu atau jumlah arus kas kontraktual sehingga tidak memenuhi kondisi ini. Dalam melakukan penilaian, Bank mempertimbangkan:

- Kejadian kontinjensi yang akan mengubah jumlah dan waktu arus kas;
- Fitur *leverage*;
- Persyaratan pelunasan dipercepat dan perpanjangan fasilitas;
- Ketentuan yang membatasi klaim Bank atas arus kas dari aset tertentu (seperti pinjaman *non-recourse*); dan
- Fitur yang memodifikasi imbalan dari nilai waktu atas uang (seperti penetapan ulang suku bunga berkala).

**Penilaian model bisnis**

Model bisnis mengacu pada bagaimana aset keuangan dikelola bersama untuk menghasilkan arus kas untuk Bank. Arus kas mungkin dihasilkan dengan menerima arus kas kontraktual, menjual aset keuangan atau keduanya. Model bisnis ditentukan pada tingkat agregasi di mana kelompok aset dikelola bersama untuk mencapai tujuan tertentu dan tidak bergantung pada niat manajemen pada instrumen individual.

Grup menilai model bisnis pada aset keuangan setidaknya pada tingkat lini bisnis atau pada di mana terdapat variasi mandat/tujuan dalam lini bisnis, pada lini bisnis produk atau pada tingkat desk yang lebih granular (misalnya sub-portofolio atau sub-lini bisnis).

Penentuan model bisnis dilakukan dengan mempertimbangkan semua bukti relevan yang tersedia pada tanggal penilaian. Ini termasuk, tetapi tidak terbatas pada:

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**d. Financial assets and liabilities (continued)**

**(i) Financial assets (continued)**

*In assessing whether the contractual cash flows are SPPI, the Bank considers the contractual terms of the instrument. This includes assessing whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition. In making the assessment, the Bank considers:*

- *Contingent events that would change the amount and timing of cash flows;*
- *Leverage features;*
- *Prepayment and extension terms;*
- *Terms that limit the Bank's claim to cash flows from specified assets (e.g. non-recourse loans); and*
- *Features that modify consideration of the time value of money (e.g. periodical reset of interest rates).*

**Business model assessment**

*Business model refers to how financial assets are managed together to generate cash flows for the Bank. This may be collecting contractual cash flows, selling financial assets or both. Business models are determined at a level of aggregation where groups of assets are managed together to achieve a particular objective and do not depend on management's intentions for individual instruments.*

*The Group assesses the business model of financial assets at least at business line level or where there are varying mandates or objectives within a business line, at a more granular product business line or desk level (i.e. sub-portfolios or sub-business lines).*

*Business model determinations are made considering all relevant evidence that is available at the date of the assessment. This includes, but is not limited to:*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**d. Aset dan liabilitas keuangan (lanjutan)**

**d. Financial assets and liabilities (continued)**

**(i) Aset keuangan (lanjutan)**

**(i) Financial assets (continued)**

**Penilaian model bisnis (lanjutan)**

**Business model assessment (continued)**

- bagaimana kinerja bisnis dan aset keuangan yang ada di dalam unit bisnis itu dievaluasi dan dilaporkan kepada manajemen. Tingkat pemisahan yang diidentifikasi untuk klasifikasi PSAK 71 harus konsisten dengan bagaimana portofolio aset dipisahkan dan dilaporkan kepada manajemen;
- risiko yang mempengaruhi kinerja unit bisnis dan aset keuangan yang dimiliki dalam unit bisnis itu dan khususnya bagaimana risiko itu dikelola; dan
- bagaimana manajer unit bisnis dikompensasi (misalnya, apakah kompensasi didasarkan pada nilai wajar dari aset yang dikelola atau pada arus kas kontraktual yang dikumpulkan).

- how the performance of the business and the financial assets held within that business unit are evaluated and reported to management. The level of segregation identified for SFAS 71 classification should be consistent with how asset portfolios are segregated and reported to senior management;
- the risks that affect the performance of the business unit and the financial assets held within that business unit and in particular the way those risks are managed; and
- how managers of the business unit are compensated (for example, whether the compensation is based on the fair value of the assets managed or on the contractual cash flows collected).

Penentuan model bisnis dilakukan berdasarkan skenario yang diperkirakan akan terjadi oleh Grup dan tidak dalam kondisi sangat tertekan atau 'kondisi terburuk'. Jika aset dijual dalam kondisi yang tidak diharapkan oleh Grup untuk berlaku ketika aset diakui, klasifikasi aset keuangan yang ada dalam portofolio tidak disajikan secara tidak akurat, tetapi kondisi tersebut harus dipertimbangkan untuk aset yang diperoleh di masa mendatang.

Business model determinations are made on the basis of scenarios that the Group reasonably expects to occur and not under highly stressed or 'worst case' conditions. Where assets are disposed of under conditions that the Group did not reasonably expect to prevail when the assets were recognised, the classification of existing financial assets in the portfolio are not rendered inaccurate but the conditions in question should be considered for any assets acquired going forward.

Pemilihan model operasi dalam PSAK 71 dirancang sedemikian rupa sehingga akuntansi untuk instrumen di FVTPL adalah pilihan yang tepat/*conscious*.

The targeting operating model for SFAS 71 is designed such that accounting for instruments at FVTPL is a conscious choice.

Perubahan pada model bisnis atau pengenalan model bisnis baru ditentukan melalui proses persetujuan unit bisnis baru.

Changes to business models or the introduction of new business models are determined through the new business unit approval process.

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**d. Aset dan liabilitas keuangan (lanjutan)**

**(i) Aset keuangan (lanjutan)**

**Penilaian model bisnis (lanjutan)**

Grup dapat mereklasifikasi seluruh aset keuangan yang terpengaruh jika dan hanya jika, model bisnis untuk pengelolaan aset keuangan berubah.

**Pengakuan**

Pembelian dan penjualan aset keuangan yang lazim (reguler) diakui pada tanggal perdagangan dimana Grup memiliki komitmen untuk membeli atau menjual aset tersebut.

Pada saat pengakuan awal, aset keuangan diukur pada nilai wajar ditambah/dikurangi (untuk *item* yang tidak diukur pada nilai wajar melalui laba rugi setelah pengakuan awal) biaya transaksi yang dapat diatribusikan secara langsung atas perolehan aset keuangan. Pengukuran aset keuangan setelah pengakuan awal tergantung pada klasifikasi aset keuangan tersebut.

Biaya transaksi hanya meliputi biaya-biaya yang dapat diatribusikan secara langsung untuk perolehan suatu aset keuangan dan merupakan biaya tambahan yang tidak akan terjadi apabila instrumen keuangan tersebut tidak diperoleh.

Aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi pada awalnya dicatat sebesar nilai wajar dan biaya transaksinya dibebankan pada laporan laba rugi.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**d. Financial assets and liabilities (continued)**

**(i) Financial assets (continued)**

**Business model assessment (continued)**

The Group can reclassified all of its financial assets when and only, its business model for managing those financial assets changes.

**Recognition**

Regular way purchases and sales of financial assets are recognised on the trade date at which the Group commits to purchase or sell those assets.

A financial asset is initially measured at fair value plus/less (for an item not subsequently measured at fair value through profit or loss) transaction costs that are directly attributable to the acquisition of a financial asset. The subsequent measurement of financial assets depends on their classification.

Transaction costs include only those costs that are directly attributable to the acquisition of a financial asset are incremental costs that would not have been incurred if the instrument had not been acquired.

Financial assets carried at fair value through profit or loss are initially recognised at fair value and transaction costs are expensed in the profit or loss.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**d. Aset dan liabilitas keuangan (lanjutan)**

**d. Financial assets and liabilities (continued)**

**(ii) Liabilitas keuangan**

**(ii) Financial liabilities**

Penilaian apakah suatu aset keuangan telah dimodifikasi baik secara substansial maupun tidak substansial dilakukan oleh unit bisnis yang berwenang melakukan modifikasi atau restrukturisasi aset keuangan pada saat unit bisnis tersebut melakukan tindakan modifikasi atau restrukturisasi atas suatu aset keuangan.

An assessment of whether a financial asset has been modified substantially or not substantially is carried out by a business unit whose authorized to modify or restructure financial assets, when the business unit performs modification or restructure of a financial asset.

Modifikasi aset keuangan dianggap substansial dan Grup akan berhenti mengakui aset keuangan awal ketika:

Modifications to financial assets are considered substantial and the Group will cease to recognize the original financial assets when:

- (a) aset keuangan (atau bagiannya) berakhir, yaitu jika debitur secara hukum dibebaskan dari tanggung jawab utama atas aset tersebut (atau bagiannya), baik melalui proses hukum maupun oleh kreditor pembuatan kontrak kredit baru (sebagai contoh, opsi *equity conversion*); atau
- (b) terdapat konversi mata uang.

- (a) the financial asset (or portion thereof) expires, that is, if the debtor is legally released from primary responsibility for the asset (or any portion thereof), either by legal process or by the creditor entering into a new credit contract (for example, the equity conversion option); or
- (b) there is a currency conversion.

Grup kemudian akan mengukur aset keuangan yang telah dimodifikasi baik secara substansial maupun tidak substansial dengan cara berikut:

The Group will measure the substantially and not substantially modified financial assets as follows:

- (a) Modifikasi Aset Keuangan yang Substansial
  - 1) Saat arus kas kontraktual atas aset keuangan direnegosiasi atau dimodifikasi (antara lain ketika kredit direstrukturisasi) dimana renegosiasi atau modifikasi tersebut menghasilkan penghentian pengakuan aset keuangan, Grup akan mencatat aset keuangan tersebut sebagai aset keuangan baru/ modifikasian pada tanggal modifikasi/ negosiasi.
  - 2) Selisih jumlah tercatat bruto aset keuangan awal dengan nilai wajar aset modifikasian diakui di laba rugi.
  - 3) Pendapatan atau biaya transaksi yang terjadi sehubungan dengan kejadian modifikasi diakui sebagai bagian dari keuntungan atau kerugian atas modifikasi tersebut.
  - 4) Selanjutnya, Grup melakukan penilaian apakah aset keuangan baru/modifikasian merupakan aset yang berasal dari aset keuangan memburuk.

- (a) Substantial Modification of Financial Assets
  - 1) When the contractual cashflow on a financial asset is renegotiated or modified (including when a credit is restructured) and the renegotiation or modification results in derecognition of the financial asset, therefore the Group will record the financial asset as a new / modified financial asset on the modification / negotiation date.
  - 2) The difference between the gross amount of the initial financial assets and the fair value of the modified assets recorded as profit or loss.
  - 3) Transaction income or costs incurred in connection with a modification event recognized as part of gain or loss on the modification.
  - 4) Next, Group assess whether new/modified financial assets are assets originating from impaired financial assets.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG  
SIGNIFIKAN (lanjutan)**

**d. Aset dan liabilitas keuangan (lanjutan)**

**(ii) Liabilitas keuangan**

**(a) Modifikasi Aset Keuangan yang  
Substansial (lanjutan)**

- 5) Pengakuan pendapatan bunga atas aset yang berasal dari aset keuangan memburuk ditentukan berdasarkan suku bunga efektif yang telah disesuaikan dengan risiko kredit (*risk-adjusted effective interest rate*) untuk mendiskontokan arus kas aset keuangan yang telah dimodifikasi.

**(b) Modifikasi Aset Keuangan yang Tidak  
Substantial**

1. Saat Grup melakukan renegotiasi atau modifikasi arus kas kontraktual atas aset keuangan (antara lain ketika kredit direstrukturisasi) yang tidak memenuhi kriteria modifikasi aset keuangan yang substansial di atas, maka renegotiasi atau modifikasi tersebut tidak menghasilkan penghentian pengakuan aset keuangan.
2. Jumlah tercatat bruto aset keuangan dihitung sebesar nilai kini (*net present value*) dari arus kas kontraktual yang telah dimodifikasi atau direnegosiasi yang didiskontokan menggunakan suku bunga efektif awal.
3. Grup kemudian mengakui keuntungan atau kerugian dari modifikasi (yaitu sebesar perubahan jumlah tercatat bruto aset keuangan) dalam laporan laba rugi.
4. Pendapatan atau biaya transaksi yang terjadi sehubungan dengan kejadian modifikasi diakui sebagai penyesuaian terhadap jumlah tercatat aset keuangan yang telah dimodifikasi dan diamortisasi selama sisa jangka waktu aset keuangan modifikasian tersebut.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**d. Financial assets and liabilities (continued)**

**(ii) Financial liabilities**

**(a) Substantial Modification of Financial  
Assets (continued)**

- 5) *Recognition of interest income on assets originating from financial assets is calculated based on an effective interest rate adjusted for credit risk (risk-adjusted effective interest rate) to discount the cash flows of modified financial assets.*

**(b) Non-Substantial Modification of  
Financial Assets**

1. *When the Group renegotiates or modifies contractual cash flows of financial assets (including when loans are restructured) that do not meet the criteria for substantial modification of financial assets above, the renegotiation or modification does not result in derecognition of the financial assets.*
2. *The gross carrying amount of financial assets is computed at the net present value of modified or renegotiated contractual cash flows, discounted at the original effective interest rate.*
3. *The Group then recognizes the gain or loss from the modification (i.e the change in the gross carrying amount of the financial asset) in the profit or loss.*
4. *Transaction income or costs incurred in connection with a modification event are recognized as an adjustment to the carrying amount of the modified financial asset and amortised over the remaining term of the modified financial asset.*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**d. Aset dan liabilitas keuangan (lanjutan)**

**(iii) Penentuan nilai wajar**

Nilai wajar adalah harga yang akan diterima untuk menjual suatu aset atau harga yang akan dibayar untuk mengalihkan suatu liabilitas dalam transaksi teratur (*orderly transaction*) antara pelaku pasar (*market participants*) pada tanggal pengukuran di pasar utama atau, jika tidak terdapat pasar utama, di pasar yang paling menguntungkan dimana Grup memiliki akses pada tanggal tersebut. Nilai wajar liabilitas mencerminkan risiko wanprestasinya.

Jika tersedia, Grup mengukur nilai wajar instrumen keuangan dengan menggunakan harga kuotasi di pasar aktif untuk instrumen tersebut.

Instrumen keuangan dianggap memiliki kuotasi di pasar aktif jika harga kuotasi tersedia sewaktu-waktu dan dapat diperoleh secara rutin dari bursa, pedagang efek (*dealer*), perantara efek (*broker*), kelompok industri, badan pengawas (*pricing service* atau *regulatory agency*), dan harga tersebut mencerminkan transaksi pasar yang aktual dan rutin dalam suatu transaksi yang wajar. Jika kriteria di atas tidak terpenuhi, maka pasar aktif dinyatakan tidak tersedia. Indikasi-indikasi dari pasar tidak aktif adalah terdapat selisih yang besar antara harga penawaran dan permintaan atau kenaikan signifikan dalam selisih harga penawaran dan permintaan dan hanya terdapat beberapa transaksi terkini.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**d. Financial assets and liabilities (continued)**

**(iii) Determination of fair value**

*Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal market or, in its absence, the most advantageous market to which the Group has access at that date. The fair value of a liability reflects its non-performance risk.*

*When available, the Group measures the fair value of a financial instrument using the quoted price in an active market for that instrument.*

*A financial instrument is regarded as quoted in an active market if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. If the above criteria are not met, the market is regarded as being inactive. Indications that a market is inactive are when there is a wide bid-offer spread or significant increase in the bid-offer spread or there are few recent transactions.*



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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**d. Aset dan liabilitas keuangan (lanjutan)**

**(iii) Penentuan nilai wajar (lanjutan)**

Bukti terbaik atas nilai wajar instrumen keuangan pada saat pengakuan awal adalah harga transaksi, yaitu nilai wajar dari pembayaran yang diberikan atau diterima. Jika Grup menetapkan bahwa nilai wajar pada pengakuan awal berbeda dengan harga transaksi dan nilai wajar tidak dapat dibuktikan dengan harga kuotasi di pasar aktif untuk aset atau liabilitas yang sejenis atau berdasarkan teknik penilaian yang hanya menggunakan data dari pasar yang dapat diobservasi, maka nilai wajar instrumen keuangan pada saat pengakuan awal disesuaikan untuk menanggulangi perbedaan antara nilai wajar pada saat pengakuan awal dan harga transaksi. Setelah pengakuan awal, perbedaan tersebut diamortisasi dan diakui dalam laba rugi sepanjang umur dari instrumen tersebut.

Untuk instrumen keuangan yang tidak mempunyai harga pasar, estimasi atas nilai wajar ditetapkan dengan mengacu pada nilai wajar instrumen lain yang substansinya sama atau dihitung berdasarkan arus kas yang diharapkan terhadap aset bersih efek-efek tersebut. Untuk penyertaan saham yang nilai wajarnya tidak tersedia, estimasi atas nilai wajar dinyatakan sebesar biaya perolehan.

Nilai wajar untuk semua instrumen keuangan lainnya ditentukan dengan menggunakan teknik penilaian. Dengan teknik ini, nilai wajar merupakan suatu estimasi yang dihasilkan dari data yang dapat diobservasi dari instrumen keuangan yang sama, menggunakan model-model untuk mendapatkan estimasi nilai kini dari arus kas masa depan yang diharapkan atau teknik penilaian lainnya menggunakan input (sebagai contoh LIBOR *yield curve*, nilai tukar mata uang asing, volatilitas, dan *counterparty spreads*) yang tersedia pada tanggal laporan posisi keuangan konsolidasian.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**d. Financial assets and liabilities (continued)**

**(iii) Determination of fair value (continued)**

*The best evidence of the fair value of a financial instrument at initial recognition is normally the transaction price, i.e., the fair value of the consideration given or received. If the Group determines that the fair value at initial recognition differs from the transaction price and the fair value is evidenced neither by a quoted price in an active market for an identical asset or liability nor based on a valuation technique that uses only data from observable markets, then the financial instrument is initially measured at fair value, adjusted to defer the difference between the fair value at initial recognition and the transaction price. Subsequently, that difference is amortised and recognised in profit or loss on over the life of the instrument.*

*For financial instruments with no quoted market price, a reasonable estimate of the fair value is determined by reference to the current market value of another instrument which substantially have the same characteristic or calculated based on the expected cash flows of the underlying net asset base of the marketable securities. For the investment in shares do not have readily determinable fair values, the estimated fair value recognised as at acquisition cost.*

*For all other financial instruments, fair value is determined using valuation techniques. In these techniques, fair values are estimated from observable data in respect of similar financial instruments, using models to estimate the present value of expected future cash flows or other valuation techniques, using inputs (for example, LIBOR *yield curve*, foreign exchange rates, volatilities and *counterparty spreads*) existing at the dates of the consolidated statement of financial position.*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**d. Aset dan liabilitas keuangan (lanjutan)**

**(iv) Penentuan biaya perolehan diamortisasi**

Biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan adalah jumlah aset atau liabilitas keuangan yang diukur pada saat pengakuan awal, dikurangi pembayaran pokok, ditambah atau dikurangi dengan amortisasi kumulatif dengan menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai awal dan nilai jatuh temponya dan dikurangi cadangan kerugian penurunan nilai.

Kerugian penurunan nilai dilaporkan sebagai pengurang dari nilai tercatat dari aset keuangan dalam kelompok biaya perolehan diamortisasi, dan diakui di dalam laporan laba rugi konsolidasian sebagai "Kerugian penurunan nilai aset keuangan".

Tingkat suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi arus kas di masa datang selama perkiraan umur dari aset keuangan atau liabilitas keuangan (atau jika lebih tepat, digunakan periode yang lebih singkat) untuk memperoleh nilai tercatat bersih pada saat pengakuan awal. Pada saat menghitung tingkat suku bunga efektif, Grup mengestimasi arus kas di masa datang dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, namun tidak mempertimbangkan kerugian kredit di masa mendatang.

Perhitungan suku bunga efektif mencakup biaya transaksi dan seluruh imbalan/provisi dan bentuk lain yang dibayarkan atau diterima yang merupakan bagian tak terpisahkan dari suku bunga efektif.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**d. Financial assets and liabilities (continued)**

**(iv) Determination of amortised cost**

*The amortised cost of a financial asset or financial liability is the amount at which the financial asset or liability is measured at initial recognition, less principal repayments, plus or less the cumulative amortisation using the effective interest method of any difference between the initial amount recognised and the maturity amount and minus any allowance for impairment losses.*

*The impairment loss is reported as a deduction from the carrying value of the financial assets classified as amortised cost and recognised in the consolidated statement of profit or loss as "Impairment losses on financial assets".*

*The effective interest rate is the rate that exactly discounts the estimated future cash flows through the expected life of the financial asset or financial liability (or, where appropriate, a shorter period) to the net carrying amount at initial recognition. When calculating the effective interest rate, the Group estimates future cash flows considering all contractual terms of the financial instrument, but does not consider any future credit losses.*

*The calculation of the effective interest rate includes transaction costs and all fees and provisions paid or received that are an integral part of the effective interest rate.*

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**d. Aset dan liabilitas keuangan (lanjutan)**

**(v) Penghentian pengakuan**

Penghentian pengakuan aset keuangan dilakukan ketika hak kontraktual atas arus kas yang berasal dari aset keuangan tersebut berakhir, atau ketika aset keuangan tersebut telah ditransfer dan secara substansial seluruh risiko dan manfaat atas kepemilikan aset tersebut telah ditransfer (jika, secara substansial seluruh risiko dan manfaat tidak ditransfer, maka Grup melakukan evaluasi untuk memastikan keterlibatan berkelanjutan atas kendali yang masih dimiliki tidak mencegah penghentian pengakuan). Liabilitas keuangan dihentikan pengakuannya ketika liabilitas telah dilepaskan atau dibatalkan atau kadaluwarsa.

Dalam transaksi dimana Grup secara substansial tidak memiliki atau tidak mentransfer seluruh risiko dan manfaat atas kepemilikan aset keuangan, Grup menghentikan pengakuan aset tersebut jika Grup tidak lagi memiliki pengendalian atas aset tersebut. Hak dan kewajiban yang masih dimiliki dalam transfer tersebut diakui secara terpisah sebagai aset atau liabilitas. Dalam transfer dimana pengendalian atas aset masih dimiliki, Grup tetap mengakui aset yang ditransfer tersebut sebesar keterlibatan berkelanjutan, dimana tingkat keberlanjutan Grup dalam aset yang ditransfer adalah sebesar perubahan nilai aset yang ditransfer.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**d. Financial assets and liabilities (continued)**

**(v) Derecognition**

*Financial assets are derecognised when the contractual rights to receive the cash flows from these financial assets have ceased to exist, or the financial assets have been transferred and substantially all the risks and rewards of ownership of the assets are also transferred (that is, if substantially all the risks and rewards have not been transferred, then Group tests control to ensure that continuing involvement on the basis of any retained powers of control does not prevent derecognition). Financial liabilities are derecognised when they have been redeemed, or cancelled, or otherwise extinguished.*

*In transactions in which the Group neither retains nor transfers substantially all the risks and rewards of ownership of a financial asset, the Group derecognises the asset if it does not retain control over the asset. The rights and obligations retained in the transfer are recognised separately as assets and liabilities as appropriate. In transfers in which control over the asset is retained, the Group continues to recognise the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset.*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**d. Aset dan liabilitas keuangan (lanjutan)**

**(v) Penghentian pengakuan (lanjutan)**

Grup menghapusbukkan aset keuangan dan cadangan kerugian penurunan nilai terkait, pada saat Grup menentukan bahwa aset keuangan tersebut tidak dapat ditagih seluruhnya. Keputusan ini diambil setelah mempertimbangkan informasi seperti telah terjadinya perubahan signifikan pada posisi keuangan debitur/penerbit aset keuangan sehingga debitur/penerbit aset keuangan tidak lagi dapat melunasi kewajibannya, atau hasil penjualan agunan tidak akan cukup untuk melunasi seluruh eksposur pinjaman yang diberikan.

**e. Saling hapus**

Aset keuangan dan liabilitas keuangan disalinghapuskan dan nilai bersihnya dilaporkan pada laporan posisi keuangan konsolidasian jika, dan hanya jika Grup memiliki hak yang berkekuatan hukum untuk melakukan saling hapus atas jumlah yang telah diakui tersebut dan adanya maksud untuk menyelesaikan liabilitas secara bersamaan.

Hak saling hapus tidak kontingen atas peristiwa di masa depan dan dapat dipaksakan secara hukum di dalam situasi bisnis yang normal, dan dalam peristiwa gagal bayar atau kebangkrutan dari Grup atau pihak lawan.

Pendapatan dan beban disajikan dalam jumlah bersih hanya jika diperkenankan oleh standar akuntansi.

**f. Klasifikasi dan reklasifikasi instrumen keuangan**

**Klasifikasi aset dan liabilitas keuangan**

Grup mengklasifikasikan instrumen keuangan ke dalam klasifikasi tertentu yang mencerminkan sifat dari informasi dan mempertimbangkan karakteristik dari instrumen keuangan tersebut. Klasifikasi ini dapat dilihat pada tabel berikut:

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**d. Financial assets and liabilities (continued)**

**(v) Derecognition (continued)**

The Group write off a financial asset and any related allowance for impairment losses, when the Group determines that the financial asset is completely uncollectible. This determination is reached after considering information such as the occurrence of significant changes in the financial position of debtor/financial asset's issuer such that the debtor/financial asset's issuer can no longer pay the obligation, or that proceeds from collateral will not be sufficient to pay back the entire exposure.

**e. Offsetting**

Financial assets and liabilities are offset and the net amount is reported in the consolidated statements of financial position if only the Group has a legal right to offset the recognised amounts and there is an intention to settle on net basis, or realise the asset and settle the liability simultaneously.

The legally enforceable right must not be contingent on future events and must be enforceable in the normal course of business and in the event of default, insolvency or bankruptcy of the Group or the counterparty.

Income and expenses are presented on a net basis only when permitted by the accounting standards.

**f. Classification and reclassification of financial instruments**

**Classification of financial assets and liabilities**

The Group classifies the financial instruments into classes that reflects the nature of information and take into account the characteristic of those financial instruments. The classification can be seen in the table below:

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**f. Klasifikasi dan reklasifikasi instrumen keuangan (lanjutan)**

**f. Classification and reclassification of financial instruments (continued)**

Kategori yang didefinisikan oleh PSAK 71/ Category as defined by SFAS 71		Golongan (ditentukan oleh Grup)/ Classes (as determined by the Group)
Aset keuangan/ Financial assets	Biaya perolehan diamortisasi/ <i>Amortised cost</i>	Kas/ <i>Cash</i>
		Giro pada Bank Indonesia/ <i>Current accounts with Bank Indonesia</i>
		Giro pada bank lain/ <i>Current accounts with other banks</i>
		Penempatan pada Bank Indonesia dan bank lain/ <i>Placements with Bank Indonesia and other banks</i>
		Efek-efek/ <i>Marketable securities</i>
		Tagihan akseptasi/ <i>Acceptance receivables</i>
		Pinjaman yang diberikan/ <i>Loans</i>
		Efek-efek yang dibeli dengan janji dijual Kembali/ <i>Securities purchased under resale agreements</i>
		Pendapatan bunga dan syariah yang masih akan diterima/ <i>Interest and sharia income receivables</i>
		Aset lain-lain/ <i>Other assets</i>
Aset keuangan yang diukur pada nilai wajar melalui laba rugi/ <i>Financial assets measured at fair value through profit or loss</i>	Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain/ <i>Financial assets measured at fair value through other comprehensive income</i>	Efek-efek/ <i>Marketable securities</i>
		Penyertaan saham/ <i>Investments in shares</i>
Liabilitas keuangan/ Financial liabilities	Liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi/ <i>Financial liabilities at amortised cost</i>	Liabilitas segera/ <i>Obligations due immediately</i>
		Simpanan nasabah/ <i>Deposits from customers</i>
		Simpanan dari bank lain/ <i>Deposits from other banks</i>
		Efek-efek yang dijual dengan janji dibeli kembali/ <i>Securities sold under repurchase agreement</i>
		Efek-efek yang diterbitkan/ <i>Securities issued</i>
		Utang akseptasi/ <i>Acceptance payables</i>
Komitmen dan kontinjensi/ Commitment and contingency	Fasilitas pinjaman yang diberikan yang belum digunakan/ <i>Unused loan facilities granted</i>	Akrual dan liabilitas lain-lain/ <i>Accruals and other liabilities</i>
		Garansi yang diberikan/ <i>Guarantees issued</i>

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**f. Klasifikasi dan reklasifikasi instrumen keuangan (lanjutan)**

**Reklasifikasi aset keuangan**

Grup diperkenankan untuk melakukan reklasifikasi atas aset keuangan yang dimiliki jika Grup mengubah model bisnis untuk pengelolaan aset keuangan.

Perubahan model bisnis sifatnya harus berdampak secara signifikan terhadap kegiatan operasional Grup seperti memperoleh, melepaskan, atau mengakhiri suatu lini bisnis. Selain itu, Grup perlu membuktikan adanya perubahan tersebut kepada pihak eksternal.

Grup akan mereklasifikasi seluruh aset keuangan yang terkena dampak dari perubahan model bisnis. Perubahan tujuan model bisnis Grup harus berdampak sebelum tanggal reklasifikasi.

Yang bukan merupakan perubahan model bisnis adalah:

- a. perubahan intensi berkaitan dengan aset keuangan tertentu (bahkan dalam situasi perubahan signifikan dalam kondisi pasar);
- b. hilangnya sementara pasar tertentu untuk aset keuangan; dan
- c. pengalihan aset keuangan antara bagian dari Grup dengan model bisnis berbeda.

**Dampak Reklasifikasi Aset Keuangan**

Dampak reklasifikasi aset keuangan pada laba rugi atau ekuitas dan pengukuran awalnya adalah sebagai berikut:

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**f. Classification and reclassification of financial instruments (continued)**

**Reclassification of financial assets**

The Group can reclassify its all of its financial assets when and only, its business model for managing those financial assets changes.

The characteristic of business model changes must significantly impact to the Group operational activities such as collecting, disposing or terminating a business line. In addition, the Group has to prove the changes to external parties.

The Group will reclassify all financial assets impacted by business model changes. Changes of the objective of the Group's business model must be impacted before reclassification date.

The following lists are not changes in business model:

- a. changes in intention in relation with certain financial asset (even in situations of significant changes in market conditions);
- b. temporary loss of certain markets for financial assets; and
- c. transfer of financial asset between Group with different business model.

**Impact of Reclassification of Financial Assets**

The impact of reclassification of financial asset on profit or loss or equity and its initial measurement is as follows:

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**f. Klasifikasi dan Reklasifikasi Instrumen keuangan (lanjutan)**

**f. Classification and Reclassification of Financial Instruments (continued)**

Reklasifikasi/ Reclassification		Dampak Terhadap Laba Rugi/ Impact on profit or loss	Dampak Terhadap Ekuitas/ Impact on equity	Nilai Tercatat Awal Setelah Reklasifikasi/ Initial Carrying Value After Reclassification
Dari/ From	Ke/ To			
FVPL	Amortised Cost	-	-	1. Nilai wajar pada tanggal reklasifikasi menjadi jumlah tercatat bruto yang baru/ <i>Fair value at the reclassification date becomes its new gross carrying amount.</i> 2. Suku bunga efektif ditentukan pada dasar nilai wajar aset pada tanggal reklasifikasi/ <i>Effective interest rate is determined at the fair value of the asset at reclassification date.</i>
	FVOCI	-	-	1. Aset keuangan tetap diukur pada nilai wajarnya/ <i>Financial assets is measured at fair value.</i> 2. Suku bunga efektif ditentukan pada dasar nilai wajar aset pada tanggal reklasifikasi/ <i>Effective interest rate is determined at the fair value of the asset at reclassification date.</i>
Amortised Cost	FVPL	Selisih antara nilai tercatat sebelum reklasifikasi dan nilai wajar setelah reklasifikasi/ <i>Difference in carrying amount before reclassification and fair value after reclassification</i>	-	Nilai wajarnya diukur pada tanggal reklasifikasi/ <i>Fair value is measured at reclassification date.</i>
	FVOCI	-	Selisih antara nilai tercatat sebelum reklasifikasi dan nilai wajar setelah reklasifikasi/ <i>Difference in carrying amount before reclassification and fair value after reclassification</i>	1. Nilai wajarnya diukur pada tanggal reklasifikasi/ <i>Fair value is measured at reclassification date.</i> 2. Suku bunga efektif dan pengukuran kerugian kredit ekspektasian tidak perlu disesuaikan/ <i>Effective interest rate and expected credit loss is not adjusted.</i>



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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**f. Klasifikasi dan Reklasifikasi Instrumen keuangan (lanjutan)**

**f. Classification and Reclassification of Financial Instruments (continued)**

Reklasifikasi/ Reclassification		Dampak Terhadap Laba Rugi/ Impact on profit or loss	Dampak Terhadap Ekuitas/ Impact on equity	Nilai Tercatat Awal Setelah Reklasifikasi/ Initial Carrying Value After Reclassification
Dari/ From	Ke/ To			
FVOCI	Amortised Cost	-	Keuntungan atau kerugian kumulatif dihapus dari ekuitas dan disesuaikan terhadap nilai wajar/ Cumulative gain or loss on OCI is adjusted against the fair value of the financial asset	1. Nilai wajar pada tanggal reklasifikasi menjadi jumlah tercatat bruto yang baru ditambah atau dikurangi keuntungan atau kerugian kumulatif sebelumnya/ Fair value at the reclassification date becomes its new gross carrying amount by added or deducted the previous cumulative gain or loss. 2. Suku bunga efektif dan pengukuran kerugian kredit ekspektasian tidak perlu disesuaikan/ Effective interest rate and expected credit loss is not adjusted.
	FVOCI	Keuntungan atau kerugian kumulatif direklasifikasi dari ekuitas menjadi laba rugi/ Cumulative gain or loss on OCI is reclassified to profit or loss		Aset keuangan tetap diukur pada nilai wajarnya/ Financial assets is measured at fair value

Sebelum 1 Januari 2020

Before January 1, 2020

Grup tidak diperkenankan untuk mereklasifikasi instrumen keuangan dari atau ke kategori instrumen keuangan yang diukur pada nilai wajar melalui laba rugi selama instrumen keuangan tersebut dimiliki atau diterbitkan.

The Group shall not reclassify any financial instruments out of or into the fair value through profit or loss category while it is held or issued.

Grup tidak boleh mengklasifikasikan aset keuangan sebagai aset keuangan dimiliki hingga jatuh tempo, jika dalam tahun berjalan atau dalam kurun waktu dua tahun sebelumnya, telah menjual atau mereklasifikasi aset keuangan dimiliki hingga jatuh tempo dalam jumlah yang lebih dari jumlah yang tidak signifikan sebelum jatuh tempo (lebih dari jumlah yang tidak signifikan dibandingkan dengan jumlah nilai investasi dimiliki hingga jatuh tempo), kecuali penjualan atau reklasifikasi tersebut:

The Group shall not classify any financial assets as held-to-maturity if the Group has, during the current financial year or during the two preceding financial years, sold or reclassified more than an insignificant amount of held-to-maturity financial assets before maturity (more than insignificant in relation to the total amount of held-to-maturity financial assets), other than sales or reclassifications that:

- a. dilakukan ketika aset keuangan sudah mendekati jatuh tempo atau tanggal pembelian kembali di mana perubahan suku bunga pasar tidak akan berpengaruh secara signifikan terhadap nilai wajar aset keuangan tersebut;

- a. are so close to maturity or the financial asset's call date that changes in the market rate of interest would not have a significant effect on the financial asset's fair value;

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG  
SIGNIFIKAN (lanjutan)**

**f. Klasifikasi dan Reklasifikasi Instrumen  
keuangan (lanjutan)**

Sebelum 1 Januari 2020 (lanjutan)

- b. terjadi setelah Grup telah memperoleh secara substansial seluruh jumlah pokok aset keuangan tersebut sesuai jadwal pembayaran atau Grup telah memperoleh pelunasan dipercepat; atau
- c. terkait dengan kejadian tertentu yang berada di luar kendali Grup, tidak berulang dan tidak dapat diantisipasi secara wajar oleh Grup.
- d. Reklasifikasi aset keuangan dari kelompok dimiliki hingga jatuh tempo ke kelompok tersedia untuk dijual dicatat sebesar nilai wajarnya. Keuntungan atau kerugian yang belum direalisasi tetap dilaporkan dalam komponen penghasilan komprehensif lain sampai aset keuangan tersebut dihentikan pengakuannya dan pada saat itu, keuntungan atau kerugian kumulatif yang sebelumnya diakui dalam penghasilan komprehensif lain harus diakui pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian sebagai komponen keuntungan/kerugian dari penjualan aset keuangan.
- e. Reklasifikasi aset keuangan dari kelompok tersedia untuk dijual ke kelompok dimiliki hingga jatuh tempo dicatat pada nilai tercatat. Keuntungan atau kerugian yang belum direalisasi harus diamortisasi menggunakan suku bunga efektif sampai dengan tanggal jatuh tempo instrumen tersebut.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**f. Classification and Reclassification of  
Financial Instruments (continued)**

Before January 1, 2020 (continued)

- b. occur after the Group has collected substantially all of the financial asset's original principal through scheduled payments or prepayments; or
- c. are attributable to an isolated event that is beyond the Group's control, is non-recurring and could not have been reasonably by the Group.
- d. Reclassification of financial assets from held to maturity classification to available for sale are recorded at fair value. Unrealised gains or losses are recorded in other comprehensive income component until the financial assets is derecognised, at which time the cumulative gain or loss previously recognised in other comprehensive income shall be recognised in consolidated statement of profit or loss and other comprehensive income under gain/loss from sale of financial assets.
- e. Reclassification of financial assets available for sale to held to maturity recorded at book value. Unrealised gains or losses must be amortised using the effective interest rate until the maturity date of the instrument.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**g. Penurunan nilai dari aset keuangan**

Grup menilai dengan dasar perkiraan masa yang akan datang kerugian kredit ekspektasian (*Expected Credit Loss*/"ECL") terkait dengan instrumen aset keuangan yang dicatat pada biaya perolehan diamortisasi dan nilai wajar melalui penghasilan komprehensif lain. Metodologi penurunan nilai yang ditampilkan tergantung kepada apakah tidak terjadi peningkatan risiko kredit yang signifikan untuk aset keuangan yang diukur pada biaya perolehan diamortisasi dan diukur pada nilai wajar melalui penghasilan komprehensif lain (FVOCI). Jika pada tanggal pelaporan, risiko kredit atas aset keuangan tidak meningkat secara signifikan sejak pengakuan awal, maka Grup akan mengukur penyisihan kerugian untuk aset keuangan tersebut sejumlah ECL 12 bulan. Jika risiko kredit atas aset keuangan telah meningkat secara signifikan dari pengakuan awal, maka Grup akan menyajikan penyisihan kerugian sejumlah ECL *lifetime*.

ECL 12 bulan dan ECL *lifetime*

ECL 12 bulan adalah bagian dari kerugian kredit ekspektasian sepanjang umurnya yang merepresentasikan ECL yang timbul dari peristiwa gagal bayar aset keuangan yang mungkin terjadi dalam 12 bulan setelah tanggal pelaporan (atau periode yang lebih pendek jika umur aset keuangan yang diharapkan kurang dari 12 bulan). ECL 12 bulan dibobot oleh probabilitas terjadinya *default* dimaksud.

ECL *lifetime* adalah kerugian yang diakibatkan dari semua kejadian default yang mungkin terjadi selama perkiraan waktu umur hidup aset keuangan.

Staging Criteria

Aset keuangan harus dialokasikan ke salah satu dari tiga tahap penurunan nilai (*stage 1, stage 2, stage 3*) dengan menentukan apakah terjadi peningkatan risiko kredit yang signifikan atas aset keuangan sejak pengakuan awal atau apakah fasilitas tersebut gagal bayar pada setiap tanggal pelaporan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**g. Impairment of financial assets**

The group assesses on a forward-looking basis the expected credit loss associated with its financial assets instruments carried at amortised cost and fair value at other comprehensive income. The impairment methodology applied depends on whether there has been a significant increase in credit risk to financial asset measured at amortised cost and at fair value through other comprehensive income (FVOCI). If at the reporting date, credit risk on financial asset has not increased significantly since initial recognition, the Group shall measure the allowance for losses for that financial asset at the amount of 12 (twelve) months expected losses. If the credit risk on that financial asset has increased significantly since initial recognition, the Group shall measure the allowance for losses at the amount of expected credit losses over its lifetime.

12-month ECL and Lifetime ECL

12-month ECL is the portion of ECL that result from default events that are possible within the 12 months after reporting date (or the shorter period if expected life of financial asset is less than 12 months). 12-month ECL is weighted by probability of default.

Lifetime ECL is the ECL that result from all possible default events over the expected life of financial asset.

Staging Criteria

Financial asset must be allocated to one of three stages of impairment (*stage 1, stage 2, stage 3*) by determining whether there is a significant increase in credit risk on the financial asset since initial recognition or whether the facility has defaulted on each reporting date.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**g. Penurunan nilai dari aset keuangan (lanjutan)**

*Stage 1:* ECL diakui pada saat pengakuan awal instrumen keuangan dan merepresentasikan kekurangan kas sepanjang umur aset yang timbul dari kemungkinan gagal bayar di masa yang akan datang dalam kurun waktu dua belas bulan sejak tanggal pelaporan. ECL terus ditentukan oleh dasar ini sampai timbul peningkatan risiko kredit yang signifikan pada instrumen tersebut atau instrumen tersebut telah mengalami penurunan nilai kredit. Jika suatu instrumen tidak lagi dianggap menunjukkan peningkatan risiko kredit yang signifikan, maka ECL dihitung kembali berdasarkan basis dua belas bulan.

*Stage 2:* mencakup aset keuangan yang mengalami peningkatan signifikan atas risiko kredit ("SICR") sejak pengakuan awal (kecuali jika memiliki risiko kredit rendah pada tanggal pelaporan), namun tidak memiliki bukti penurunan nilai yang obyektif. Untuk aset ini, ECL *lifetime* dihitung. ECL *lifetime* adalah kerugian pinjaman yang diharapkan yang dihasilkan dari semua kejadian *default* yang mungkin terjadi selama perkiraan umur dari aset keuangan.

Bank menggunakan berbagai pengukuran kualitatif dan kuantitatif dalam menilai SICR seperti berikut:

Pinjaman yang diberikan

- a. Kriteria kuantitatif  
Akun-akun dengan 30 hari tunggakan ("DPD") dianggap telah mengalami peningkatan risiko kredit yang signifikan.
- b. Kriteria kualitatif  
Debitur dengan DPD kurang dari 30 hari yang telah direstrukturisasi (kecuali debitur restrukturisasi akibat dampak pandemi COVID-19) dianggap memiliki kenaikan signifikan atas risiko kredit.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**g. Impairment of financial assets (continued)**

*Stage 1:* ECL are recognised at the time of initial recognition of a financial instrument and represent the lifetime cash shortfalls arising from possible default events up to twelve months into the future from the reporting date. ECL continue to be determined on this basis until there is either a significant increase in the credit risk of an instrument or the instrument becomes credit-impaired. If an instrument is no longer considered to exhibit a significant increase in credit risk, ECL will revert to being determined on a 12-month basis.

*Stage 2:* includes financial assets that experience a significant increase in credit risk ("SICR") since initial recognition (unless having low credit risk at the reporting date), but do not have objective evidence of impairment. For these assets, Lifetime ECL will be calculated. Lifetime ECL are the ECL that results from all possible default events over the expected life of financial asset.

The Bank uses a number of qualitative and quantitative measures in assessing SICR as follows:

Loans

- a. Quantitative criteria  
Accounts that are 30 days past due ("DPD") are considered to have experienced a significant increase in credit risk.
- b. Qualitative criteria  
Debtors with DPD less than 30 days which have been restructured (except for restructured debtors as a result of the COVID-19 pandemic) which is considered to have a significant increase in credit risk.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG  
SIGNIFIKAN (lanjutan)**

**g. Penurunan nilai dari aset keuangan  
(lanjutan)**

*Stage 3:* Aset hanya akan dianggap mengalami penurunan nilai dan kerugian kredit ekspektasian sepanjang umurnya diakui, jika terdapat bukti objektif penurunan nilai yang dapat diobservasi. Faktor-faktor yang diobservasi ini serupa dengan indikator bukti objektif penurunan nilai pada PSAK 55, termasuk antara lain aset gagal bayar atau mengalami kesulitan keuangan yang signifikan atau mengalami *forbearance* atas kredit yang mengalami penurunan nilai (disebut sebagai 'aset *Stage 3*'). Pengukuran kerugian kredit ekspektasian di seluruh tahapan aset diperlukan untuk mencerminkan jumlah yang tidak bias dan rata-rata probabilitas tertimbang yang ditentukan dengan mengevaluasi serangkaian kemungkinan yang dapat terjadi menggunakan informasi yang wajar dan dapat didukung dengan peristiwa di masa lampau, kondisi saat ini dan proyeksi terkait dengan kondisi ekonomis di masa depan.

Aset keuangan yang mengalami penurunan nilai (atau gagal bayar) merupakan aset yang setidaknya telah memiliki tunggakan lebih dari 90 hari atas pokok dan/atau bunga atau memiliki peringkat kredit tertentu (*default*). Aset keuangan juga dianggap mengalami penurunan nilai kredit dimana debitur kemungkinan besar tidak akan membayar dengan terjadinya satu atau lebih kejadian yang teramati yang memiliki dampak menurunkan jumlah estimasi arus kas masa depan dari aset keuangan tersebut. Cadangan kerugian penurunan nilai terhadap aset keuangan yang mengalami penurunan nilai ditentukan berdasarkan penilaian terhadap arus kas yang dapat dipulihkan berdasarkan sejumlah skenario, termasuk realisasi jaminan yang dimiliki jika memungkinkan. ECL akan mencerminkan rata-rata tertimbang dari skenario berdasarkan probabilitas dari skenario yang relevan untuk terjadi. Cadangan kerugian penurunan nilai merupakan selisih antara nilai sekarang dari arus kas yang diperkirakan akan dipulihkan, didiskontokan pada suku bunga efektif awal, dan nilai tercatat bruto instrumen sebelum penurunan nilai kredit.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**g. Impairment of financial assets (continued)**

*Stage 3:* An asset is only considered credit impaired and lifetime expected credit losses recognised, if there is observed objective evidence of impairment. These factors are similar to the indicators of objective evidence of impairment under SFAS 55, this includes, amongst other factors, assets in default or experiencing significant financial difficulty, or experiencing forbearance on impaired credit (mentioned as 'Stage 3 asset'). The measurement of expected credit losses across all stages is required to reflect an unbiased and probability weighted amount that is determined by evaluating a range of reasonably possible outcomes using reasonable and supportable information about past events, current conditions and forecasts of future economic conditions.

Financial assets that are credit impaired (or in default) represent those that are at least 90 days past due in respect of principal and/or interest or has certain credit grades (default). Financial assets are also considered to be credit impaired where the debtors are unlikely to pay on the occurrence of one or more observable events that have a detrimental impact on the estimated future cash flows of the financial asset. Loss provisions against credit impaired financial assets are determined based on an assessment of the recoverable cash flows under a range of scenarios, including the realisation of any collateral held where appropriate. The ECL will reflect weighted average of the scenarios based on the probability of the relevant scenario to occur. The loss provisions held represent the difference between the present value of the cash flows expected to be recovered, discounted at the instrument's original effective interest rate, and the gross carrying value of the instrument prior to any credit impairment

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**g. Penurunan nilai dari aset keuangan (lanjutan)**

Periode yang diperhitungkan ketika mengukur kerugian kredit ekspektasian adalah periode kontrak aset keuangan. Umur ekspektasian dapat dipengaruhi oleh pembayaran dimuka dan periode kontrak maksimum melalui opsi perpanjangan kontrak. Untuk portofolio revolving tertentu, umur ekspektasian dinilai sepanjang periode dimana Bank terekspos dengan risiko kredit (berdasarkan durasi waktu yang dibutuhkan untuk fasilitas kredit ditarik).

Untuk aset yang diukur pada biaya perolehan diamortisasi, saldo di neraca mencerminkan aset bruto dikurangi kerugian kredit ekspektasian. Untuk instrumen utang dalam kategori FVOCI, saldo di neraca mencerminkan nilai wajar dari instrumen dikurangi dengan cadangan kerugian kredit ekspektasian.

Untuk menentukan kerugian kredit ekspektasian komponen-komponen ini akan diperhitungkan secara bersama-sama dan didiskontokan ke tanggal laporan keuangan menggunakan diskonto berdasarkan suku bunga efektif.

PSAK 71 mensyaratkan penyertaan informasi tentang kejadian masa lalu, kondisi saat ini dan perkiraan kondisi ekonomi masa depan. Perkiraan perubahan dalam kerugian pinjaman yang diharapkan harus mencerminkan, dan secara langsung konsisten dengan, perubahan dalam data terkait yang diobservasi dari periode ke periode. Perhitungan ECL ini membutuhkan estimasi *forward-looking* dari *Probability of Default* (PD), *Loss Given Default* (LGD) dan *Exposure At Default* (EAD).

Untuk komitmen pinjaman dan kontrak jaminan keuangan, tanggal pada saat Grup menjadi pihak dalam suatu komitmen yang tidak dapat dibatalkan merupakan tanggal pengakuan awal untuk keperluan penerapan persyaratan penurunan nilai.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**g. Impairment of financial assets (continued)**

The period considered when measuring expected credit loss is the contractual term of the financial asset. The expected life may be impacted by prepayments and the maximum contractual term by extension options. For certain revolving portfolios, the expected life is assessed over the period that the Bank is exposed to credit risk (which is based on the length of time it takes for credit facilities to be withdrawn).

For assets measured at amortised cost, the balance sheet amount reflects the gross asset less the expected credit losses. For debt instruments held at FVOCI, the balance sheet amount reflects the instrument's fair value less the expected credit losses.

To determine the expected credit loss, these components are multiplied together and discounted to the balance sheet date using the effective interest rate as the discount rate.

SFAS 71 requires supportable information about past events, current condition and forecasts of future economic conditions. Estimated movement on expected credit losses have to be reflected and directly consistent with changes in observed related data over the period. This ECL calculation needs forward-looking estimation from *Probability of Default* (PD), *Loss Given Default* (LGD) and *Exposure At Default* (EAD).

For loan commitments and financial guarantee contracts, the date when the Group become a party in a irrevocable commitment is the date of initial recognition for implementation of impairment purposes.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG  
SIGNIFIKAN (lanjutan)**

**g. Penurunan nilai dari aset keuangan  
(lanjutan)**

**a. *Probability of Default* ("PD")**

Probabilitas yang timbul di suatu waktu dimana debitur mengalami gagal bayar, dikalibrasikan sampai dengan periode 12 bulan dari tanggal laporan (*Stage 1*) atau sepanjang umur (*Stage 2* dan *3*) dan digabungkan pada dampak asumsi ekonomi masa depan yang memiliki risiko kredit. PD diestimasi pada *point in time* dimana hal ini berfluktuasi sejalan dengan siklus ekonomi.

**b. *Loss Given Default* ("LGD")**

Kerugian yang diperkirakan akan timbul dari debitur yang mengalami gagal bayar dengan menggabungkan dampak dari asumsi ekonomi masa depan yang relevan (jika ada) dimana hal ini mewakili perbedaan antara arus kas kontraktual yang akan jatuh tempo dengan arus kas yang diharapkan untuk diterima. Grup mengestimasi LGD berdasarkan data historis dari tingkat pemulihan dan memperhitungkan pemulihan yang berasal dari jaminan terhadap aset keuangan dengan mempertimbangkan asumsi ekonomi di masa depan jika relevan.

**c. *Exposure at Default* ("EAD")**

Perkiraan nilai eksposur neraca pada saat gagal bayar dengan mempertimbangkan bahwa perubahan ekspektasi yang diharapkan selama masa eksposur. Hal ini menggabungkan dampak penarikan fasilitas yang committed pembayaran pokok dan bunga, amortisasi dan pembayaran dipercepat, bersama dengan dampak asumsi ekonomi masa depan jika relevan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**g. *Impairment of financial assets* (continued)**

**a. *Probability of Default* ("PD")**

The probability at a point in time that a counterparty will default, calibrated over up to 12 months from the reporting date (*Stage 1*) or over the lifetime of the product (*Stage 2* and *3*) and incorporating the impact of forward-looking economic assumptions that have an effect on credit risk. PD is estimated at a point in time that means it will fluctuate in line with the economic cycle.

**b. *Loss Given Default* ("LGD")**

The loss that is expected to arise on default, incorporating the impact of relevant forward looking economic assumptions (if any), which represents the difference between the contractual cash flows due and those that the Group expects to receive. The Group estimates LGD based on the historical recovery rates and considers the recovery of any collateral that is integral to the financial assets, taking into account forward looking economic assumptions if relevant.

**c. *Exposure at Default* ("EAD")**

The expected balance sheet exposure at the time of default, taking into account that expected change in exposure over the lifetime of the exposure. This incorporates the impact of drawdowns of committed facilities, repayments of principal and interest, amortisation and prepayments, together with the impact of forward looking economic assumptions where relevant.



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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**h. Penurunan nilai dari aset non-keuangan**

Nilai tercatat aset non-keuangan Grup, selain aset pajak tangguhan, dikaji pada setiap tanggal pelaporan untuk menentukan ada tidaknya indikasi penurunan nilai. Untuk tujuan pengujian penurunan nilai, aset yang tidak dapat diuji secara individual dapat digabungkan ke dalam kelompok aset terkecil yang menghasilkan arus kas masuk dari penggunaan berkelanjutan yang sebagian besar independen dari arus kas masuk dari aset lainnya (Unit Penghasil Kas atau "CGU"). Jika terdapat indikasi adanya penurunan nilai tersebut, maka nilai terpulihkan aset diestimasi.

Kerugian penurunan nilai diakui jika nilai tercatat suatu aset atau CGU melebihi estimasi nilai terpulihkannya. Nilai terpulihkan suatu aset adalah nilai yang terbesar antara nilai pakai aset atau CGU dan nilai wajar dikurangi biaya penjualan. Dalam penentuan nilai pakai aset, estimasi arus kas masa depan didiskontokan menggunakan tingkat diskonto sebelum pajak yang menggambarkan penilaian pasar kini atas nilai waktu dari uang dan risiko yang terkait dengan aset yang bersangkutan.

Kerugian penurunan nilai atas aset non-keuangan yang diakui pada tahun sebelumnya dikaji pada setiap tanggal pelaporan keuangan untuk menilai apakah terdapat indikasi bahwa rugi penurunan nilai yang telah diakui sebelumnya telah menurun atau tidak ada lagi. Kerugian penurunan nilai, kecuali untuk *goodwill*, dipulihkan jika terdapat perubahan estimasi yang digunakan untuk menentukan nilai terpulihkan. Jumlah kerugian penurunan nilai yang dibalik tidak boleh menyebabkan nilai aset melebihi nilai tercatat neto setelah penyusutan atau amortisasi, seandainya tidak ada kerugian penurunan nilai yang diakui.

**i. Kas dan setara kas**

Kas meliputi kas dan kas dalam *ksanah*. Untuk tujuan laporan arus kas konsolidasian, kas dan setara kas mencakup kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, dan Sertifikat Bank Indonesia yang jatuh tempo dalam 3 (tiga) bulan atau kurang sejak tanggal perolehan yang tidak dijaminkan atau dibatasi penggunaannya.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**h. Impairment of non-financial assets**

The carrying amount of the Group's non-financial assets, other than deferred tax assets, are reviewed at each reporting date to determine whether there is any indication of impairment. For the purpose of impairment testing, assets that cannot be tested individually are grouped together into the smallest group of assets that generates cash inflows from continuing use that are largely independent of the cash inflows of other assets (Cash Generating Units or "CGU"). If any such indication exists, then the asset's recoverable amount is estimated.

An impairment loss is recognised if the carrying amount of an asset or CGU exceeds its estimated recoverable amount. The recoverable amount of an asset or CGU is the greater of its value in use and its fair value less cost to sell. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

Impairment losses in respect of non-financial assets recognised in prior year are assessed at each reporting date for any indications that the loss has decreased or no longer exists. An impairment loss, except for goodwill, is reversed if there has been a change in the estimates used to determine the recoverable amount. An impairment loss is reversed only to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortisation, if no impairment loss had been recognised.

**i. Cash and cash equivalents**

Cash includes cash on hand and cash in vault. For the purpose of the consolidated statement of cash flows, cash and cash equivalents include cash, current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks, and Certificates of Bank Indonesia maturing within 3 (three) months or less from the date of acquisition and are not pledged or restricted

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**j. Giro pada Bank Indonesia dan bank lain**

Giro pada Bank Indonesia dan bank lain diklasifikasikan sebagai aset keuangan yang diukur pada biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas aset keuangan.

Giro pada Bank Indonesia dan bank lain dinyatakan sebesar saldo giro dikurangi dengan cadangan kerugian penurunan nilai.

**k. Penempatan pada Bank Indonesia dan bank lain**

Penempatan pada Bank Indonesia dan bank lain merupakan penanaman dana dalam bentuk *interbank call money*, Deposito berjangka, Sertifikat deposito, Sertifikat Investasi Mudharabah Antarbank ("SIMA") dan Fasilitas Simpanan Bank Indonesia ("FASBI").

**l. Efek-efek**

Efek-efek yang dimiliki terdiri dari Sertifikat Bank Indonesia ("SBI"), Surat Utang Negara, Surat Berharga Syariah Negara, obligasi korporasi, wesel jangka menengah, unit penyertaan reksadana, dan efek-efek pasar uang dan pasar modal lainnya.

Setelah pengakuan awal, efek-efek diukur sesuai dengan klasifikasinya masing-masing, sebagai diukur pada biaya perolehan diamortisasi atau diukur pada nilai wajar melalui pendapatan komprehensif lain ("FVOCI") atau diukur pada nilai wajar melalui laporan laba rugi ("FVTPL").

**1. Diukur pada biaya perolehan diamortisasi**

Setelah pengakuan awal, investasi diukur pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**j. Current accounts with Bank Indonesia and other banks**

*Current accounts with Bank Indonesia and other banks are classified as financial assets measured at amortised cost. Refer to Note 2d for the accounting policy of financial assets.*

*Current accounts with Bank Indonesia and other banks are stated at the outstanding balance less allowance for impairment losses.*

**k. Placements with Bank Indonesia and other banks**

*Placements with Bank Indonesia and other banks consist of interbank call money, Time deposit, Certificate of deposits, Certificates of Interbanks Mudharabah Investment ("SIMA") and Bank Indonesia Deposit Facility ("FASBI").*

**l. Marketable securities**

*Marketable securities consist of Certificates of Bank Indonesia ("SBI"), Government Promissory Notes, Government Sharia Bonds, corporate bonds, medium term notes, mutual fund investment units and other money market and capital market securities.*

*Subsequently accounted for, marketable securities depending on their respective classifications, as either measured at amortised cost or measured at fair value through other comprehensive income ("FVOCI") or measured at fair value through profit or loss ("FVTPL").*

**1. Measured at amortised cost**

*Subsequently, investment measured at amortised cost using effective interest rate method.*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**I. Efek-efek (lanjutan)**

**2. Diukur pada FVOCI**

Setelah pengakuan awal, diukur pada nilai wajar dimana keuntungan dan kerugian yang belum direalisasi atas perubahan nilai wajar akan diakui sebagai penghasilan komprehensif lain. Perubahan pada kerugian kredit ekspektasian diakui laba rugi dan diakumulasi pada ekuitas. Pada saat penghentian pengakuan, akumulasi keuntungan atau kerugian nilai wajar bersih, setelah akumulasi cadangan kerugian penurunan nilai, ditransfer ke laba rugi.

**3. Diukur pada FVTPL**

Seluruh aset keuangan yang tidak diklasifikasikan sebagai diukur dengan biaya perolehan diamortisasi atau FVOCI sebagaimana ketentuan di atas diukur dengan FVTPL. Instrumen keuangan yang dikelompokkan ke dalam kategori ini diakui pada nilai wajarnya pada saat pengakuan awal; biaya transaksi diakui secara langsung ke dalam laporan laba rugi konsolidasian. Keuntungan dan kerugian yang timbul dari perubahan nilai wajar dan penjualan instrumen keuangan diakui di dalam laporan laba rugi konsolidasian.

Grup menilai dengan dasar perkiraan masa yang akan datang kerugian kredit ekspektasian (*Expected Credit Loss*/"ECL") terkait dengan instrumen aset keuangan yang dicatat pada biaya perolehan diamortisasi dan nilai wajar melalui penghasilan komprehensif lain. Metodologi penurunan nilai yang ditampilkan tergantung kepada apakah tidak terjadi peningkatan risiko kredit yang signifikan untuk aset keuangan yang diukur pada biaya perolehan diamortisasi dan diukur pada nilai wajar melalui penghasilan komprehensif lain (FVOCI). Jika pada tanggal pelaporan, risiko kredit atas aset keuangan tidak meningkat secara signifikan sejak pengakuan awal, maka Grup akan mengukur penyisihan kerugian untuk aset keuangan tersebut sejumlah ECL 12 bulan. Jika risiko kredit atas aset keuangan telah meningkat secara signifikan dari pengakuan awal, maka Grup akan menyajikan penyisihan kerugian sejumlah ECL *lifetime*.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**I. Marketable securities (continued)**

**2. Measured at FVOCI**

*Subsequently, investment carried at fair value with all unrealised gains and losses arising from changes in fair value recognised in other comprehensive income. Changing in expected credit losses recognised in the profit or loss and are accumulated in equity. On derecognition, the cumulative fair value gains or losses, net of cumulative allowance for impairment losses, are transferred to the profit or loss.*

**3. Measured at FVTPL**

*All financial assets not classified as measured at amortised cost or FVOCI as described above are measured at FVTPL. Financial instruments grouped into this category are recognised at their fair value at initial recognition; transaction costs are recognised directly in the consolidated statements of profit or loss. Gains and losses arising from changes in fair value and sale of financial instruments are recognised in the consolidated statements of profit or loss.*

*The group assesses on a forward-looking basis the expected credit loss associated with its financial assets instruments carried at amortised cost and fair value at other comprehensive income. The impairment methodology applied depends on whether there has been a significant increase in credit risk to financial asset measured at amortised cost and at fair value through other comprehensive income (FVOCI). If at the reporting date, credit risk on financial asset has not increased significantly since initial recognition, the Group shall measure the allowance for losses for that financial asset at the amount of 12 (twelve) months expected losses. If the credit risk on that financial asset has increased significantly since initial recognition, the Group shall measure the allowance for losses at the amount of expected credit losses over its lifetime.*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**I. Efek-efek (lanjutan)**

ECL 12 bulan dan ECL lifetime

ECL 12 bulan adalah bagian dari kerugian kredit ekspektasian sepanjang umurnya yang merepresentasikan ECL yang timbul dari peristiwa gagal bayar aset keuangan yang mungkin terjadi dalam 12 bulan setelah tanggal pelaporan (atau periode yang lebih pendek jika umur aset keuangan yang diharapkan kurang dari 12 bulan). ECL 12 bulan dibobot oleh probabilitas terjadinya *default* dimaksud.

ECL *lifetime* adalah kerugian yang diakibatkan dari semua kejadian default yang mungkin terjadi selama perkiraan waktu umur hidup aset keuangan.

Staging Criteria

Aset keuangan harus dialokasikan ke salah satu dari tiga tahap penurunan nilai (*stage 1*, *stage 2*, *stage 3*) dengan menentukan apakah terjadi peningkatan risiko kredit yang signifikan atas aset keuangan sejak pengakuan awal atau apakah fasilitas tersebut gagal bayar pada setiap tanggal pelaporan.

*Stage 1*: ECL diakui pada saat pengakuan awal instrumen keuangan dan merepresentasikan kekurangan kas sepanjang umur aset yang timbul dari kemungkinan gagal bayar di masa yang akan datang dalam kurun waktu dua belas bulan sejak tanggal pelaporan. ECL terus ditentukan oleh dasar ini sampai timbul peningkatan risiko kredit yang signifikan pada instrumen tersebut atau instrumen tersebut telah mengalami penurunan nilai kredit. Jika suatu instrumen tidak lagi dianggap menunjukkan peningkatan risiko kredit yang signifikan, maka ECL dihitung kembali berdasarkan basis dua belas bulan.

*Stage 2*: mencakup aset keuangan yang mengalami peningkatan signifikan atas risiko kredit ("SICR") sejak pengakuan awal (kecuali jika memiliki risiko kredit rendah pada tanggal pelaporan), namun tidak memiliki bukti penurunan nilai yang obyektif. Untuk aset ini, ECL *lifetime* dihitung. ECL *lifetime* adalah kerugian pinjaman yang diharapkan yang dihasilkan dari semua kejadian *default* yang mungkin terjadi selama perkiraan umur dari aset keuangan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**I. Marketable securities (continued)**

12-month ECL and Lifetime ECL

12-month ECL is the portion of ECL that result from default events that are possible within the 12 months after reporting date (or the shorter period if expected life of financial asset is less than 12 months). 12-month ECL is weighted by probability of default.

Lifetime ECL is the ECL that result from all possible default events over the expected life of financial asset.

Staging Criteria

Financial asset must be allocated to one of three stages of impairment (*stage 1*, *stage 2*, *stage 3*) by determining whether there is a significant increase in credit risk on the financial asset since initial recognition or whether the facility has defaulted on each reporting date.

*Stage 1*: ECL are recognised at the time of initial recognition of a financial instrument and represent the lifetime cash shortfalls arising from possible default events up to twelve months into the future from the reporting date. ECL continue to be determined on this basis until there is either a significant increase in the credit risk of an instrument or the instrument becomes credit-impaired. If an instrument is no longer considered to exhibit a significant increase in credit risk, ECL will revert to being determined on a 12-month basis.

*Stage 2*: includes financial assets that experience a significant increase in credit risk ("SICR") since initial recognition (unless having low credit risk at the reporting date), but do not have objective evidence of impairment. For these assets, Lifetime ECL will be calculated. Lifetime ECL are the ECL that results from all possible default events over the expected life of financial asset.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG  
SIGNIFIKAN (lanjutan)**

**I. Efek-efek (lanjutan)**

Bank menggunakan berbagai pengukuran kualitatif dan kuantitatif dalam menilai SICR seperti berikut:

Pinjaman yang diberikan

- a. Kriteria kuantitatif  
Akun-akun dengan 30 hari tunggakan ("DPD") dianggap telah mengalami peningkatan risiko kredit yang signifikan.
- b. Kriteria kualitatif  
Debitur dengan DPD kurang dari 30 hari yang telah direstrukturisasi (kecuali debitur restrukturisasi akibat dampak pandemi COVID-19) dianggap memiliki kenaikan signifikan atas risiko kredit.

*Stage 3:* Aset hanya akan dianggap mengalami penurunan nilai dan kerugian kredit ekspektasian sepanjang umurnya diakui, jika terdapat bukti objektif penurunan nilai yang dapat diobservasi. Faktor-faktor yang diobservasi ini serupa dengan indikator bukti objektif penurunan nilai pada PSAK 55, termasuk antara lain aset gagal bayar atau mengalami kesulitan keuangan yang signifikan atau mengalami *forbearance* atas kredit yang mengalami penurunan nilai (disebut sebagai 'aset Stage 3'). Pengukuran kerugian kredit ekspektasian di seluruh tahapan aset diperlukan untuk mencerminkan jumlah yang tidak bias dan rata-rata probabilitas tertimbang yang ditentukan dengan mengevaluasi serangkaian kemungkinan yang dapat terjadi menggunakan informasi yang wajar dan dapat didukung dengan peristiwa di masa lampau, kondisi saat ini dan proyeksi terkait dengan kondisi ekonomis di masa depan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**I. Marketable securities (continued)**

The Bank uses a number of qualitative and quantitative measures in assessing SICR as follows:

Loans

- a. Quantitative criteria  
Accounts that are 30 days past due ("DPD") are considered to have experienced a significant increase in credit risk.
- b. Qualitative criteria  
Debtors with DPD less than 30 days which have been restructured (except for restructured debtors as a result of the COVID-19 pandemic) which is considered to have a significant increase in credit risk.

*Stage 3:* An asset is only considered credit impaired and lifetime expected credit losses recognised, if there is observed objective evidence of impairment. These factors are similar to the indicators of objective evidence of impairment under SFAS 55, this includes, amongst other factors, assets in default or experiencing significant financial difficulty, or experiencing forbearance on impaired credit (mentioned as 'Stage 3 asset'). The measurement of expected credit losses across all stages is required to reflect an unbiased and probability weighted amount that is determined by evaluating a range of reasonably possible outcomes using reasonable and supportable information about past events, current conditions and forecasts of future economic conditions.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**I. Efek-efek (lanjutan)**

Aset keuangan yang mengalami penurunan nilai (atau gagal bayar) merupakan aset yang setidaknya telah memiliki tunggakan lebih dari 90 hari atas pokok dan/atau bunga atau memiliki peringkat kredit tertentu (*default*). Aset keuangan juga dianggap mengalami penurunan nilai kredit dimana debitur kemungkinan besar tidak akan membayar dengan terjadinya satu atau lebih kejadian yang teramati yang memiliki dampak menurunkan jumlah estimasi arus kas masa depan dari aset keuangan tersebut. Cadangan kerugian penurunan nilai terhadap aset keuangan yang mengalami penurunan nilai ditentukan berdasarkan penilaian terhadap arus kas yang dapat dipulihkan berdasarkan sejumlah skenario, termasuk realisasi jaminan yang dimiliki jika memungkinkan. ECL akan mencerminkan rata-rata tertimbang dari skenario berdasarkan probabilitas dari skenario yang relevan untuk terjadi. Cadangan kerugian penurunan nilai merupakan selisih antara nilai sekarang dari arus kas yang diperkirakan akan dipulihkan, didiskontokan pada suku bunga efektif awal, dan nilai tercatat bruto instrumen sebelum penurunan nilai kredit.

Periode yang diperhitungkan ketika mengukur kerugian kredit ekspektasian adalah periode kontrak aset keuangan. Umur ekspektasian dapat dipengaruhi oleh pembayaran dimuka dan periode kontrak maksimum melalui opsi perpanjangan kontrak. Untuk portofolio revolving tertentu, umur ekspektasian dinilai sepanjang periode dimana Bank terekspos dengan risiko kredit (berdasarkan durasi waktu yang dibutuhkan untuk fasilitas kredit ditarik).

Untuk aset yang diukur pada biaya perolehan diamortisasi, saldo di neraca mencerminkan aset bruto dikurangi kerugian kredit ekspektasian. Untuk instrumen utang dalam kategori FVOCI, saldo di neraca mencerminkan nilai wajar dari instrumen dikurangi dengan cadangan kerugian kredit ekspektasian.

Untuk menentukan kerugian kredit ekspektasian komponen-komponen ini akan diperhitungkan secara bersama-sama dan didiskontokan ke tanggal laporan keuangan menggunakan diskonto berdasarkan suku bunga efektif.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**I. Marketable securities (continued)**

*Financial assets that are credit impaired (or in default) represent those that are at least 90 days past due in respect of principal and/or interest or has certain credit grades (default). Financial assets are also considered to be credit impaired where the debtors are unlikely to pay on the occurrence of one or more observable events that have a detrimental impact on the estimated future cash flows of the financial asset. Loss provisions against credit impaired financial assets are determined based on an assessment of the recoverable cash flows under a range of scenarios, including the realisation of any collateral held where appropriate. The ECL will reflect weighted average of the scenarios based on the probability of the relevant scenario to occur. The loss provisions held represent the difference between the present value of the cash flows expected to be recovered, discounted at the instrument's original effective interest rate, and the gross carrying value of the instrument prior to any credit impairment*

*The period considered when measuring expected credit loss is the contractual term of the financial asset. The expected life may be impacted by prepayments and the maximum contractual term by extension options. For certain revolving portfolios, the expected life is assessed over the period that the Bank is exposed to credit risk (which is based on the length of time it takes for credit facilities to be withdrawn).*

*For assets measured at amortised cost, the balance sheet amount reflects the gross asset less the expected credit losses. For debt instruments held at FVOCI, the balance sheet amount reflects the instrument's fair value less the expected credit losses.*

*To determine the expected credit loss, these components are multiplied together and discounted to the balance sheet date using the effective interest rate as the discount rate.*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**I. Efek-efek (lanjutan)**

PSAK 71 mensyaratkan penyertaan informasi tentang kejadian masa lalu, kondisi saat ini dan perkiraan kondisi ekonomi masa depan. Perkiraan perubahan dalam kerugian pinjaman yang diharapkan harus mencerminkan, dan secara langsung konsisten dengan, perubahan dalam data terkait yang diobservasi dari periode ke periode. Perhitungan ECL ini membutuhkan estimasi forward-looking dari *Probability of Default* (PD), *Loss Given Default* (LGD) dan *Exposure At Default* (EAD).

Untuk komitmen pinjaman dan kontrak jaminan keuangan, tanggal pada saat Grup menjadi pihak dalam suatu komitmen yang tidak dapat dibatalkan merupakan tanggal pengakuan awal untuk keperluan penerapan persyaratan penurunan nilai.

**d. *Probability of Default* ("PD")**

Probabilitas yang timbul di suatu waktu dimana debitur mengalami gagal bayar, dikalibrasikan sampai dengan periode 12 bulan dari tanggal laporan (*Stage 1*) atau sepanjang umur (*Stage 2* dan *3*) dan digabungkan pada dampak asumsi ekonomi masa depan yang memiliki risiko kredit. PD diestimasi pada *point in time* dimana hal ini berfluktuasi sejalan dengan siklus ekonomi.

**e. *Loss Given Default* ("LGD")**

Kerugian yang diperkirakan akan timbul dari debitur yang mengalami gagal bayar dengan menggabungkan dampak dari asumsi ekonomi masa depan yang relevan (jika ada) dimana hal ini mewakili perbedaan antara arus kas kontraktual yang akan jatuh tempo dengan arus kas yang diharapkan untuk diterima. Grup mengestimasi LGD berdasarkan data historis dari tingkat pemulihan dan memperhitungkan pemulihan yang berasal dari jaminan terhadap aset keuangan dengan mempertimbangkan asumsi ekonomi di masa depan jika relevan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**I. *Marketable securities* (continued)**

SFAS 71 requires supportable information about past events, current condition and forecasts of future economic conditions. Estimated movement on expected credit losses have to be reflected and directly consistent with changes in observed related data over the period. This ECL calculation needs forward-looking estimation from *Probability of Default* (PD), *Loss Given Default* (LGD) and *Exposure At Default* (EAD).

For loan commitments and financial guarantee contracts, the date when the Group become a party in a irrevocable commitment is the date of initial recognition for implementation of impairment purposes.

**d. *Probability of Default* ("PD")**

The probability at a point in time that a counterparty will default, calibrated over up to 12 months from the reporting date (*Stage 1*) or over the lifetime of the product (*Stage 2* and *3*) and incorporating the impact of forward-looking economic assumptions that have an effect on credit risk. PD is estimated at a point in time that means it will fluctuate in line with the economic cycle.

**e. *Loss Given Default* ("LGD")**

The loss that is expected to arise on default, incorporating the impact of relevant forward looking economic assumptions (if any), which represents the difference between the contractual cash flows due and those that the Group expects to receive. The Group estimates LGD based on the historical recovery rates and considers the recovery of any collateral that is integral to the financial assets, taking into account forward looking economic assumptions if relevant.



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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG  
SIGNIFIKAN (lanjutan)**

**I. Efek-efek (lanjutan)**

*f. Exposure at Default ("EAD")*

Perkiraan nilai eksposur neraca pada saat gagal bayar dengan mempertimbangkan bahwa perubahan ekspektasi yang diharapkan selama masa eksposur. Hal ini menggabungkan dampak penarikan fasilitas yang committed pembayaran pokok dan bunga, amortisasi dan pembayaran dipercepat, bersama dengan dampak asumsi ekonomi masa depan jika relevan.

**m. Pinjaman yang diberikan, pembiayaan dan piutang syariah**

Restrukturisasi pinjaman bisa meliputi modifikasi persyaratan pinjaman, konversi pinjaman menjadi saham atau instrumen keuangan lainnya dan/atau kombinasi dari keduanya.

Pinjaman yang direstrukturisasi dan tidak dihentikan pengakuannya disajikan sebesar nilai yang lebih rendah antara nilai tercatat pinjaman pada tanggal restrukturisasi atau proyeksi nilai kini dari penerimaan kas masa depan setelah restrukturisasi. Kerugian akibat selisih antara nilai tercatat pinjaman pada tanggal restrukturisasi dengan nilai tunai penerimaan kas masa depan setelah restrukturisasi diakui sebagai laba/rugi. Setelah restrukturisasi, semua penerimaan kas masa depan yang ditetapkan dalam persyaratan baru dicatat sebagai pengembalian pokok pinjaman yang diberikan dan pendapatan bunga sesuai dengan syarat-syarat restrukturisasi.

Termasuk di dalam pinjaman yang adalah termasuk pembiayaan oleh PT Bank Victoria Syariah, Entitas Anak, berupa pembiayaan dan piutang syariah.

Penjelasan secara ringkas dari masing-masing jenis pembiayaan dan piutang tersebut adalah sebagai berikut:

Pembiayaan *mudharabah* adalah penanaman dana dari pemilik dana (*shahibul maal*) kepada pengelola dana (*mudharib*) untuk melakukan kegiatan usaha tertentu, dengan menggunakan bagi hasil (*profit sharing*) atau metode bagi hasil usaha (*gross profit margin*) antara kedua belah pihak berdasarkan *nisbah* yang telah disepakati sebelumnya. Entitas Anak mengenakan bagi hasil berdasarkan metode margin laba kotor.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**I. Marketable securities (continued)**

*f. Exposure at Default ("EAD")*

The expected balance sheet exposure at the time of default, taking into account that expected change in exposure over the lifetime of the exposure. This incorporates the impact of drawdowns of committed facilities, repayments of principal and interest, amortisation and prepayments, together with the impact of forward looking economic assumptions where relevant.

**m. Loans, sharia financing and receivables**

Loan restructuring may involve a modification of the terms of the loans, conversion of loans into equity or other financial instruments and/or a combination of both.

Restructured loans which are not derecognised, are stated at the lower of carrying value of the loan at the time of restructuring or net present value of the estimate of total future cash receipts after restructuring. Losses arising from any excess of the carrying value of the loan at the time of restructuring over the net present value of the total future cash receipts after restructuring are recognised as profit/loss. Thereafter, all cash receipts under the new terms shall be accounted for as the recovery of principal and interest revenue, in accordance with the restructuring scheme.

Included in loans are financing by PT Bank Victoria Syariah, a Subsidiary, in the form of sharia financing and receivables.

Brief explanation for each type of sharia financing and receivables are as follows:

*Mudharabah* financing is investment of funds from the owner of funds (*shahibul maal*) to the fund manager (*mudharib*) to conduct certain business activity, with profit sharing or gross profit margin method between the two parties based on a mutually agreed predetermined ratio. The Subsidiary uses profit sharing scheme based on gross profit margin method.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**m. Pinjaman yang diberikan, pembiayaan dan piutang syariah (lanjutan)**

Pembiayaan *mudharabah* dinyatakan sebesar saldo pembiayaan dikurangi dengan cadangan kerugian penurunan nilai. Entitas Anak menetapkan cadangan kerugian penurunan nilai sesuai dengan kualitas pembiayaan berdasarkan penelaahan atas masing-masing saldo pembiayaan. Apabila sebagian pembiayaan *mudharabah* hilang sebelum dimulainya usaha karena adanya kerusakan atau sebab lainnya tanpa adanya kelalaian atau kesalahan pihak pengelola dana, maka rugi tersebut mengurangi saldo pembiayaan *mudharabah* dan diakui sebagai kerugian Entitas Anak. Apabila sebagian pembiayaan *mudharabah* hilang setelah dimulainya usaha tanpa adanya kelalaian atau kesalahan pengelola dana, maka rugi tersebut diperhitungkan pada saat bagi hasil. Kerugian pembiayaan *mudharabah* akibat kelalaian atau kesalahan pengelola dana dibebankan pada pengelola dana dan tidak mengurangi saldo pembiayaan *mudharabah*.

Pembiayaan *musyarakah* adalah akad kerjasama antara dua pihak atau lebih untuk suatu usaha tertentu, dimana masing-masing pihak memberikan kontribusi dana dengan ketentuan bahwa keuntungan dibagi berdasarkan kesepakatan, sedangkan kerugian berdasarkan porsi kontribusi dana. Dana tersebut meliputi kas atau aset non-kas yang diperkenankan oleh syariah. Pembiayaan *musyarakah* dinyatakan sebesar saldo pembiayaan dikurangi dengan cadangan kerugian penurunan nilai. Entitas Anak menetapkan cadangan kerugian penurunan nilai sesuai dengan kualitas pembiayaan berdasarkan penelaahan atas masing-masing saldo pembiayaan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**m. Loans, sharia financing and receivables (continued)**

*Mudharabah financing is stated at the outstanding balance, net of allowance for possible losses. The Subsidiary provides allowance for impairment losses based on the financing quality as determined by a review of each account. In the event that a portion of the mudharabah financing is lost prior to the start of operations due to damage or any other reasons without negligence or error by the fund manager, the loss shall be deducted from mudharabah financing balance and shall be recognised as a loss by the Subsidiary. If part of mudharabah financing is lost after the commencement of business without negligence or fault of the fund manager, such loss is calculated during profit sharing. Loss on mudharabah financing due to negligence or error by the fund manager is charged to the fund manager and not deducted from the balance of mudharabah financing.*

*Musyarakah financing is an agreement between two or more parties for a particular business, in which each party contributes funds provided that the profits are divided according to the agreement, while losses are based on the portion of fund contributions. The fund consists of cash or non-cash assets allowed by sharia. Musyarakah financing is stated at outstanding balance, net of allowance for impairment losses. The Subsidiary provides allowance for impairment losses based on the financing quality as determined by a review of each account.*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG  
SIGNIFIKAN (lanjutan)**

**m. Pinjaman yang diberikan, pembiayaan dan  
piutang syariah (lanjutan)**

Piutang *Ijarah* adalah penyediaan dana dalam rangka memindahkan hak guna atau manfaat dari suatu barang atau jasa berdasarkan transaksi sewa, tanpa diikuti dengan pemindahan kepemilikan barang itu sendiri kepada penyewa. *Ijarah muntahiyah bittamlik* adalah penyediaan dana dalam rangka memindahkan hak guna atau manfaat dari suatu barang atau jasa berdasarkan transaksi sewa dengan opsi pemindahan kepemilikan barang kepada penyewa. Piutang pendapatan *ijarah* diakui pada saat jatuh tempo sebesar sewa yang belum diterima dan disajikan sebesar nilai bersih yang dapat direalisasikan, yakni sebesar saldo piutang.

*Murabahah* adalah akad jual beli barang dengan harga jual sebesar beban perolehan ditambah keuntungan yang disepakati dan penjual harus mengungkapkan beban perolehan barang tersebut kepada pembeli.

Piutang *murabahah* diklasifikasikan sebagai aset keuangan dalam kategori pinjaman yang diberikan dan piutang sesuai PSAK No. 55.

**n. Efek-efek yang dibeli dengan janji dijual  
kembali dan efek-efek yang dijual dengan  
janji dibeli kembali**

Efek-efek yang dibeli dengan janji dijual kembali merupakan transaksi dimana Grup membeli aset keuangan dan secara simultan masuk ke dalam perjanjian untuk menjual kembali aset (atau aset yang serupa secara substansial) dengan harga tetap di masa depan. Aset yang mendasari tidak diakui dalam laporan keuangan konsolidasian. Setelah pengakuan awal, efek-efek yang dibeli dengan janji dijual kembali diukur pada biaya perolehan diamortisasi. Selisih antara harga beli dan harga jual kembali diakui sebagai pendapatan bunga dengan menggunakan metode suku bunga efektif.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**m. Loans, sharia financing and receivables  
(continued)**

*Ijarah receivables* are the financing on the availability of fund in relation to transferring the right to use and benefit of a goods and service based on rental transaction which was not followed by transfer of the goods ownership to the lessee. *Ijarah muntahiyah bittamlik* is an agreement on the availability of fund in relation to transferring the use right and benefit of a goods or service based on rental transaction with an option to transfer the ownership title of goods to the lessee. *Ijarah receivables* are recognised at due date at the amount of its lease income not yet received and presented at its net realisable value, which is the outstanding balance of the receivables.

*Murabahah* is an agreement of sales transaction for goods in which the selling price is determined based on acquisition cost added with mutually agreed margin and the seller shall disclose the acquisition cost to buyer.

*Murabahah receivables* are classified as financial assets under category loan and receivables in accordance with SFAS No. 55.

**n. Securities purchased under resale  
agreements and securities sold under  
repurchase agreements**

*Securities purchased under resale agreements* are transactions in which the Group purchases a financial asset and simultaneously enters into an agreement to resell the asset (or substantially similar asset) at a fixed price on a future date. The underlying asset is not recognised in the consolidated financial statements. Subsequent to initial recognition, securities purchased under resale agreements are measured at amortised cost. The difference between purchase and resale price is recognised as interest income using the effective interest method.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**n. Efek-efek yang dibeli dengan janji dijual kembali dan efek-efek yang dijual dengan janji dibeli Kembali (lanjutan)**

Efek-efek yang dijual dengan janji dibeli kembali merupakan transaksi dimana Grup menjual aset keuangan dan secara simultan masuk ke dalam perjanjian untuk membeli kembali aset (atau aset yang serupa secara substansial) dengan harga tetap di masa depan.

Efek-efek yang dijual dengan janji untuk dibeli kembali disajikan sebagai liabilitas dalam laporan posisi keuangan konsolidasian sebesar harga beli kembali yang disepakati dikurangi selisih antara harga jual dan harga beli kembali yang disepakati. Selisih antara harga jual dan harga beli kembali yang disepakati tersebut diamortisasi sebagai beban bunga selama jangka waktu sejak efek-efek dijual hingga dibeli kembali.

**o. Tagihan dan utang akseptasi**

Setelah pengakuan awal, tagihan dan utang akseptasi diukur pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif.

**p. Penyertaan saham**

**(A) Penyertaan saham**

Penyertaan saham merupakan investasi jangka panjang pada perusahaan non-publik.

Penyertaan dalam bentuk saham dengan kepemilikan kurang dari 20% yang nilai wajarnya tidak tersedia dan dimaksudkan untuk penyertaan jangka panjang dinyatakan sebesar estimasi terbaik atas nilai wajarnya. Bila terjadi penurunan nilai yang bersifat permanen, nilai tercatatnya dikurangi untuk mengakui penurunan tersebut yang ditentukan untuk setiap investasi secara individu dan kerugiannya dibebankan pada laporan laba rugi konsolidasian tahun berjalan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**n. Securities purchased under resale agreements and securities sold under repurchase agreements (continued)**

*Securities sold under repurchase agreements are transactions in which the Group sold a financial asset and simultaneously enters into an agreement to repurchase the asset (or substantially similar asset) at a fixed price on a future date.*

*Securities sold under repurchase agreements are presented as liabilities in the consolidated statement of financial position at the agreed repurchase price less the difference between the selling price and agreed repurchase price. The difference between the selling price and agreed repurchase price is amortised as interest expense over the period commencing from the selling date to the repurchase date.*

**o. Acceptance receivables and payables**

*Subsequent to initial recognition, acceptance receivables and payables are measured at amortised cost using the effective interest method.*

**p. Investment in shares**

**(A) Investment in shares**

*Investment in shares of stock are long-term investments in non-public companies.*

*Investments in shares of stock where the ownership interest of less than 20% that do not have readily determinable fair values and are intended for long-term investments are stated at their best estimate of fair value. The carrying amount of the investments is written-down to recognise a permanent decline in the value of the individual investments. Any such write-down is charged directly to current year consolidated statement of profit or loss.*

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SIGNIFIKAN (lanjutan)**

**p. Penyertaan saham (lanjutan)**

**(B) Penyertaan saham sementara**

Penyertaan saham sementara merupakan penyertaan modal oleh Grup, dalam bentuk saham pada perusahaan debitur untuk mengatasi akibat kegagalan kredit, sebagaimana dimaksud dalam ketentuan peraturan perundang-undangan yang berlaku.

Grup wajib melakukan divestasi penyertaan saham sementara apabila penyertaan saham sementara telah melebihi jangka waktu paling lama 5 (lima) tahun atau perusahaan tersebut telah memperoleh saldo laba positif pada ekuitasnya.

Penyertaan dalam bentuk saham dengan kepemilikan lebih dari 20%, tanpa ada pengaruh signifikan diklasifikasikan sebagai aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi. Lihat Catatan 2d untuk kebijakan akuntansi atas aset keuangan dalam kelompok yang diukur pada nilai wajar melalui laporan laba rugi.

**q. Aset tetap dan penyusutan**

Pada tanggal 30 November 2015, Bank melakukan perubahan kebijakan akuntansi atas aset tetap dari model biaya menjadi model revaluasi.

Aset tetap Grup disajikan sebesar nilai wajar, dikurangi akumulasi penyusutan dan cadangan kerugian penurunan nilai untuk aset tetap (jika ada). Penilaian terhadap aset tetap dilakukan oleh penilai independen eksternal yang telah memiliki sertifikasi. Penilaian atas aset tersebut dilakukan secara berkala untuk memastikan bahwa nilai wajar aset yang direvaluasi tidak berbeda secara material dengan nilai tercatatnya. Berdasarkan kebijakan internal Grup, penilaian terhadap aset tetap yang dilakukan oleh penilai independen eksternal dilakukan 5 tahun sekali. Akumulasi penyusutan pada tanggal revaluasi dieliminasi terhadap nilai tercatat bruto aset, dan nilai bersihnya disajikan kembali sebesar nilai revaluasian aset tetap.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**p. Investment in shares (continued)**

**(B) Temporary investment in shares**

Temporary investment in shares is investment in shares by Group to debtor's company to overcome the credit defaults, in accordance with the prevailing laws.

Group is obliged to divest temporary investment in shares if the temporary investment in shares have exceeded if maximum period of 5 (five) years or the company have obtained positive retained earnings in equity.

Investments in shares where the ownership above 20%, without any significant influence is classified as financial assets at fair value through profit or loss. Refer to Note 2d for the accounting policy of financial assets at fair value through profit or loss.

**q. Fixed assets and depreciation**

On November 30, 2015, the Bank changed their accounting policies of fixed assets from cost model to revaluation model.

The Group's fixed assets are shown at fair value, less subsequent depreciation for fixed assets less accumulated impairment losses (if any). Valuation of fixed assets are performed by external independent valuers with certain qualification. Valuations are performed with sufficient regularity to ensure that the fair value of a revalued asset does not differ materially from its carrying amount. Based on Group's internal policy, valuation of fixed assets performed by external independent valuers for every 5 years. Any accumulated depreciation at the date of revaluation is eliminated against the gross carrying amount of the asset, and the net amount is restated to the revalued amount of the asset.

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**q. Aset tetap dan penyusutan (lanjutan)**

Kenaikan nilai tercatat yang timbul dari revaluasi aset tetap dicatat sebagai "Surplus revaluasi aset" dan disajikan sebagai "Penghasilan Komprehensif Lain". Penurunan yang menghapus nilai kenaikan yang sebelumnya atas aset yang sama dibebankan terhadap "Surplus revaluasi aset" sebagai bagian dari laba komprehensif; penurunan lainnya dibebankan pada laporan laba rugi konsolidasian.

Surplus revaluasi aset tetap dialihkan langsung ke saldo laba ketika aset tersebut dihentikan pengakuannya.

Tanah tidak disusutkan.

Penyusutan aset tetap selain tanah dihitung dengan menggunakan metode garis lurus untuk mengalokasikan nilai setelah revaluasi terhadap nilai sisa sepanjang estimasi masa manfaatnya sebagai berikut:

	<b>Masa manfaat/ Useful life Tahun/Years</b>	<b>Penyusutan (persentase) Depreciation (percentage)</b>	
Gedung kantor	20	5%	Office buildings
Kendaraan bermotor	4	25%	Vehicles
Mesin dan peralatan	4	25%	Machinery and equipment
Perlengkapan dan perabotan kantor	4	25%	Office furniture and equipment

Nilai sisa aset, masa manfaat, dan metode penyusutan akan ditinjau dan jika perlu disesuaikan pada setiap akhir periode pelaporan.

Pada tanggal 31 Desember 2021 dan 2020, tidak terdapat penyesuaian atas masa manfaat dan metode penyusutan.

Apabila nilai tercatat aset lebih besar dari nilai yang dapat diperoleh kembali, nilai tercatat aset diturunkan menjadi sebesar nilai yang dapat diperoleh kembali, dengan menggunakan nilai tertinggi antara harga jual neto dan nilai pakai.

Apabila aset tetap tidak digunakan lagi atau dijual, maka nilai wajar dan akumulasi penyusutannya dihapuskan dari laporan keuangan konsolidasian. Keuntungan atau kerugian yang terjadi, diakui sebagai laba/rugi periode terjadinya.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**q. Fixed assets and depreciation (continued)**

Increases in the carrying amount arising on revaluation of fixed assets recorded in "Assets revaluation reserve" and presented as "Other Comprehensive Income". Decreases that offset previous increases of the same asset are debited against "Asset revaluation reserve" as part of other comprehensive income; all other decreases are charged to the consolidated statement of profit or loss.

Gain on revaluation of fixed assets are transferred to retained earnings when fixed assets are derecognised.

Land is not depreciated.

Depreciation of fixed assets other than land are calculated based on the straight-line method to allocate their revalued amount to their residual values over their estimated useful lives as follows:

The assets residual values, useful lives, and depreciation method are reviewed and adjusted if appropriate at the end of each reporting period.

As of December 31, 2021 and 2020, there is no adjustment on useful life and depreciation method.

When the carrying amount of an asset is greater than its estimated recoverable amount, it is written down immediately to its recoverable amount, which is determined as the higher of net selling price or value in use.

When assets are retired or disposed, their fair value and the related accumulated depreciation are eliminated from the consolidated financial statements. The resulting gains or losses are recognised as related period's profit/loss.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG  
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**q. Aset tetap dan penyusutan (lanjutan)**

Biaya pemeliharaan dan perbaikan dicatat sebagai beban pada saat terjadinya. Pengeluaran yang memperpanjang masa manfaat aset dikapitalisasi dan disusutkan.

Aset tetap dalam proses pembangunan merupakan aset yang masih dalam proses renovasi atau pemasangan dan belum siap digunakan, serta dimaksudkan untuk dipergunakan dalam kegiatan usaha. Aset ini dicatat sebesar biaya yang telah dikeluarkan.

**r. Aset tak berwujud**

Aset tak berwujud yang dimiliki oleh Grup berupa perangkat lunak.

Perangkat lunak, yang bukan merupakan bagian integral dari perangkat keras yang terkait, dicatat sebagai aset tak berwujud dan dinyatakan sebesar nilai tercatat, yaitu sebesar harga perolehan dikurangi dengan akumulasi amortisasi.

Biaya perolehan perangkat lunak terdiri dari seluruh pengeluaran yang dapat dikaitkan langsung dalam persiapan perangkat lunak tersebut sehingga siap digunakan sesuai dengan maksud manajemen.

Pengeluaran setelah perolehan perangkat lunak dapat ditambahkan pada biaya perolehan perangkat lunak atau dikapitalisasi sebagai perangkat lunak hanya jika pengeluaran tersebut menambah manfaat ekonomis masa depan dari perangkat lunak yang bersangkutan sehingga menjadi lebih besar dari standar kinerja yang diperkirakan semula. Pengeluaran yang tidak menambah manfaat ekonomis masa depan dari perangkat lunak diakui sebagai beban pada saat terjadinya.

Perangkat lunak dengan umur manfaat terbatas, diamortisasi dengan menggunakan metode garis lurus selama estimasi masa manfaat ekonomis aset yaitu 4 (empat) tahun.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**q. Fixed assets and depreciation (continued)**

*Maintenance and repair cost are charged as an expense when incurred. Expenditure that extends the useful life of assets is capitalised and depreciated.*

*Assets under construction consist of assets that are still in progress of renovation or installments and not yet ready for use and intended to be used in business activity. This accounts recorded based on amounts paid.*

**r. Intangible assets**

*Intangible assets held by the Group is software.*

*The software, that is not an integral part of the related hardware, is recorded as an intangible asset and is stated at carrying value, which is at cost less accumulated amortisation.*

*Software acquisition costs consist of all expenditures attributed directly in the preparation of the software so ready to use in accordance with the intent of management.*

*Expenditures after acquisition software can be added to the cost of software or capitalised as software only if the expenses add future economic benefits of the software so as to be larger than originally expected performance standards. Expenditure that does not add to future economic benefits of the software are recognised as an expense when incurred.*

*Software with certain useful life, are amortised using straight-line method over the estimated useful life of the assets, which is 4 (four) years.*



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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**s. Agunan yang diambil alih**

Agunan yang diambil alih (AYDA) adalah aset yang diperoleh Grup, baik melalui pelelangan maupun diluar pelelangan berdasarkan penyerahan secara sukarela oleh pemilik agunan atau berdasarkan kuasa untuk menjual diluar lelang dari pemilik agunan dalam hal debitur tidak memenuhi kewajibannya kepada Grup. AYDA merupakan jaminan yang diambil alih sebagai bagian dari penyelesaian pinjaman yang diberikan, piutang dan pembiayaan syariah. Grup memiliki kebijakan untuk selalu berusaha menjual AYDA untuk menyelesaikan sisa kewajiban debitur.

AYDA diakui sebesar jumlah yang lebih rendah antara nilai tercatat dengan nilai bersih yang dapat direalisasi (*net realisable value*), yaitu nilai wajar agunan setelah dikurangi estimasi biaya pelepasan. Bila terjadi penurunan nilai yang bersifat permanen, maka nilai tercatatnya dikurangi untuk mengakui penurunan tersebut dan kerugiannya dibebankan dalam laporan laba rugi konsolidasian.

Biaya pemeliharaan atas AYDA yang terjadi setelah pengambilalihan atau akuisisi aset dibebankan sebagai laba/rugi pada saat terjadinya. Keuntungan atau kerugian dari penjualan agunan yang diambil alih diakui sebagai laba/rugi konsolidasian tahun berjalan.

**t. Biaya dibayar dimuka dan aset lain-lain**

Biaya dibayar dimuka merupakan pembayaran kepada pihak lain yang telah dilakukan namun belum merupakan beban pada saat pembayaran dilakukan. Biaya dibayar dimuka akan digunakan untuk aktivitas Grup di masa mendatang. Biaya dibayar dimuka akan diakui sebagai beban pada saat diamortisasi sesuai dengan masa manfaatnya.

Termasuk dalam biaya dibayar dimuka adalah pembiayaan, pengembangan teknologi, promosi dan beban renovasi gedung.

Termasuk di dalam aset lain-lain antara lain adalah uang muka jaminan, uang muka pembelian aset, dan uang muka pengembangan teknologi.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**s. Foreclosed assets**

*Foreclosed assets represent assets acquired by Group, both from auction and non-auction based on voluntary transfer by the debtors or based on debtors' approval to sell the collateral where the debtors could not fulfill their obligations to Group. Foreclosed assets represent collateral acquired in settlement of loans, sharia financing and receivables. The Group has policy to sell foreclosed assets to settle debtors' liabilities.*

*Foreclosed assets are recognised at lower amount between carrying value and their net realisable value, which is the fair value of the foreclosed assets less estimated cost of liquidating the foreclosed assets. If there is a permanent decline in value, the carrying amount of foreclosed collaterals in written down to recognise such permanent decline in value. Any such write-down is recognised consolidated statement of profit or loss.*

*Holding costs of foreclosed assets subsequent to the foreclosure or acquisition of the assets are charged as current year profit/loss as incurred. Gains or losses from sale of foreclosed assets are charged as current year consolidated profit/loss as incurred.*

**t. Prepaid expenses and other assets**

*Prepaid expenses are payments made to other parties but have not been recognised as expense at the time of payment. Prepaid expenses will be used for Group's activities in the future. Prepaid expenses are recognised as expenses during the amortisation in accordance with the expected period of benefit.*

*Included in prepaid expenses are financing, technology development, promotion and office building renovation expense.*

*Included in other assets are amongst others membership deposits, advance for fixed assets purchase, advance for technology development.*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**u. Liabilitas segera**

Liabilitas segera adalah liabilitas Grup kepada pihak lain yang sifatnya wajib segera dibayarkan sesuai perjanjian yang ditetapkan sebelumnya.

Liabilitas segera disajikan sebesar biaya perolehan yang diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

**v. Simpanan nasabah dan simpanan dari bank lain**

Simpanan nasabah adalah dana yang dipercayakan oleh masyarakat (selain bank) kepada Grup berdasarkan perjanjian penyimpanan dana. Termasuk dalam pos ini adalah giro, tabungan, deposito berjangka, sertifikat deposito dan bentuk lain yang dapat dipersamakan dengan itu.

Simpanan dari bank lain terdiri dari liabilitas terhadap bank lain dalam bentuk giro, *interbank call money*, deposito berjangka, tabungan, SIMA dan *deposito on call*.

Simpanan dari nasabah dan dari bank lain diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

**w. Dana syirkah temporer**

Dana *syirkah* temporer merupakan investasi dari pihak lain dengan akad *mudharabah mutlaqah*, dimana pemilik dana (*shahibul maal*) memberikan kebebasan kepada pengelola dana (*mudharib/Grup*) dalam pengelolaan investasinya dengan keuntungan dibagikan sesuai kesepakatan. Dana *syirkah* temporer terdiri dari tabungan *mudharabah*, deposito *mudharabah*, dan giro *mudharabah*.

Tabungan *mudharabah* dan giro *mudharabah* merupakan investasi yang bisa ditarik kapan saja (*on call*) atau sesuai dengan persyaratan tertentu yang disepakati. Tabungan *mudharabah* dinyatakan sebesar saldo tabungan nasabah di Grup.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**u. Obligations due immediately**

*Obligations due immediately represent Group's liabilities to other parties that are immediately paid in accordance with terms of the relevant agreements.*

*Obligations due immediately are presented at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities measured at amortised cost.*

**v. Deposits from customers and deposits from other banks**

*Deposits from customers are the funds placed by customers (excluding banks) with Group based on fund deposit agreements. Included in this account are demand deposits, saving deposits, time deposits, certificates of deposits, and other forms which are similar.*

*Deposits from other banks represent liabilities to banks in the form of demand deposits, interbank call money, time deposits, saving accounts, SIMA and deposits on call.*

*Deposits from customers and other banks are classified as financial liabilities measured at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities measured at amortised cost.*

**w. Temporary syirkah funds**

*Temporary syirkah funds represent investments from other parties conducted on the basis mudharabah mutlaqah contract in which the owners of the funds (shahibul maal) grant freedom to the fund manager (mudharib/Group) in the management of their investments with profit distributed based on the contract. Temporary syirkah funds consist of mudharabah saving deposits, mudharabah time deposits, and mudharabah demand deposits.*

*Mudharabah savings deposits and mudharabah demand deposits represent investment which could be withdrawn anytime (on call) or can be withdrawn based on certain agreed terms. Mudharabah savings deposits are stated based on the customer's savings deposit balance in the Group.*

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**w. Dana *syirkah* temporer (lanjutan)**

Deposito *mudharabah* merupakan investasi yang hanya bisa ditarik pada waktu tertentu sesuai dengan perjanjian antara pemegang deposito *mudharabah* dengan Entitas Anak. Deposito *mudharabah* dinyatakan sebesar nilai nominal sesuai dengan perjanjian antara pemegang deposito dengan Entitas Anak.

Dana *syirkah* temporer tidak dapat digolongkan sebagai liabilitas. Hal ini karena Entitas Anak tidak berkewajiban untuk mengembalikan jumlah dana awal dari pemilik dana, kecuali akibat kelalaian atau wanprestasi Entitas Anak, atau ketika mengalami kerugian. Di sisi lain, dana *syirkah* temporer tidak dapat digolongkan sebagai ekuitas karena mempunyai waktu jatuh tempo dan pemilik dana tidak mempunyai hak kepemilikan yang sama dengan pemegang saham seperti hak *voting* dan hak atas realisasi keuntungan yang berasal dari aset lancar dan aset non-investasi.

Pemilik dana *syirkah* temporer mendapatkan imbalan bagi hasil sesuai dengan *nisbah* yang ditetapkan.

**x. Efek-efek yang diterbitkan**

Efek-efek yang diterbitkan adalah obligasi yang diterbitkan dan diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atau liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

Biaya transaksi yang timbul sehubungan dengan penerbitan efek-efek dikurangkan dari hasil penerbitan efek-efek bersangkutan. Selisih antara hasil emisi bersih dengan nilai nominal obligasi diakui sebagai diskonto yang diamortisasi menggunakan metode suku bunga efektif selama umur obligasi.

**y. Pinjaman yang diterima**

Pada pengukuran awal pinjaman diterima dan pinjaman subordinasi disajikan sebesar nilai wajar dikurangi dengan biaya transaksi yang dapat diatribusikan langsung dengan perolehan/penerbitan pinjaman dan obligasi subordinasi.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**w. Temporary *syirkah* funds (continued)**

*Mudharabah* time deposits represent investment that can only be withdrawn at a certain time based on the agreement between the customer and the Subsidiary. *Mudharabah* time deposits are stated at nominal amount as agreed between the deposit holder and the Subsidiary.

Temporary *syirkah* fund cannot be classified as liability. This was due to the Subsidiary does not have any liability to return the initial fund to the owners, except for losses due to the Subsidiary's management negligence or default of loss is incurred. On the other hand, temporary *syirkah* fund cannot be classified as shareholders' equity, because of the maturity period and the depositors do not have the same rights as the shareholders' such as voting rights and the rights of realised gain from current assets and other non-investment accounts.

The owner of temporary *syirkah* funds receives a return from the profit sharing based on a predetermined ratio (*nisbah*).

**x. Marketable securities issued**

Marketable securities issued is the issuance of bond which is classified as financial liabilities measured at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities at amortised cost.

Transaction cost in relation with the marketable securities issued is deducted from the related marketable securities issued. Any difference between net proceed of bond issuance and nominal of bond is recognised as discount and will be amortised using effective interest rate during bond's period.

**y. Borrowings**

Borrowings and subordinated loans are initially presented at fair value less directly attributable transaction costs.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**y. Pinjaman yang diterima (lanjutan)**

Pinjaman yang diterima dan pinjaman subordinasi diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

**z. Transaksi Sewa**

Pada tanggal permulaan kontrak, Grup menilai apakah kontrak merupakan atau mengandung sewa. Suatu kontrak merupakan atau mengandung sewa jika kontrak tersebut memberikan hak untuk mengendalikan penggunaan aset identifikasian selama suatu jangka waktu untuk dipertukarkan dengan imbalan. Grup dapat memilih untuk tidak mengakui aset hak-guna dan liabilitas sewa untuk:

- Sewa jangka-pendek; dan
- Sewa yang aset dasarnya bernilai-rendah

Untuk menilai apakah kontrak memberikan hak untuk mengendalikan penggunaan aset identifikasian, Grup harus menilai apakah:

- Grup memiliki hak untuk mendapatkan secara substansial seluruh manfaat ekonomi dari penggunaan aset identifikasian; dan
- Grup memiliki hak untuk mengarahkan penggunaan aset identifikasian. Grup memiliki hak ini ketika Grup memiliki hak untuk pengambilan keputusan yang relevan tentang bagaimana dan untuk tujuan apa aset digunakan telah ditentukan sebelumnya:
  1. Grup memiliki hak untuk mengoperasikan aset;
  2. Grup telah mendesain aset dengan cara menetapkan sebelumnya bagaimana dan untuk tujuan apa aset akan digunakan selama periode penggunaan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**y. Borrowings (continued)**

*Borrowings and subordinated loans are classified as financial liabilities measured at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities measured at amortised cost.*

**z. Leases Transaction**

*At the inception of a contract, the Group assesses whether the contract is or contains a leases. A contract is or contains a leases if the contract conveys the right to control the use of an identified assets for a period of time in exchange for consideration. The Group can choose not to recognise the right-of-use asset and lease liabilities for:*

- *Short term lease; and*
- *Low value asset*

*To assess whether a contract conveys the right to control the use of an identified asset, the Group shall assess whether:*

- *The Group has the right to obtain substantially all the economic benefit from use of the asset throughout the period of use; and*
- *The Group has the right to direct the use of the asset. The Group has described when it has a decision-making rights that are the most relevant to changing how and for what purpose the asset is used are predetermined:*
  1. *The Group has the right to operate the asset;*
  2. *The Group has designed the asset in a way that predetermine how and for what purpose it will be used.*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**z. Transaksi Sewa (lanjutan)**

Pada tanggal permulaan sewa, Grup mengakui aset hak-guna dan liabilitas sewa. Aset hak-guna diukur pada biaya perolehan, dimana meliputi jumlah pengukuran awal liabilitas sewa yang disesuaikan dengan pembayaran sewa yang dilakukan pada atau sebelum tanggal permulaan, ditambah dengan biaya langsung awal yang dikeluarkan. Aset hak-guna diamortisasi dengan menggunakan metode garis lurus sepanjang jangka waktu sewa.

Liabilitas sewa diukur pada nilai kini pembayaran sewa yang belum dibayar pada tanggal permulaan, didiskontokan dengan menggunakan suku bunga implisit dalam sewa atau jika suku bunga tersebut tidak dapat ditentukan, maka menggunakan suku bunga pinjaman inkremental. Pada umumnya, Grup menggunakan suku bunga pinjaman inkremental sebagai tingkat bunga diskonto.

Pembayaran sewa dialokasikan menjadi bagian pokok dan biaya keuangan. Biaya keuangan dibebankan pada laba rugi selama periode sewa sehingga menghasilkan tingkat suku bunga periodik yang konstan atas saldo liabilitas untuk setiap periode.

Grup menyajikan aset hak-guna sebagai bagian dari "Aset tetap" dan liabilitas sewa sebagai bagian dari "Liabilitas lain-lain" di dalam laporan posisi keuangan konsolidasian.

Jika sewa mengalihkan kepemilikan aset pendasar kepada Grup pada akhir masa sewa atau jika biaya perolehan aset hak-guna merefleksikan Grup akan mengeksekusi opsi beli, maka Grup menyusutkan aset hak-guna dari tanggal permulaan hingga akhir umur manfaat aset pendasar. Jika tidak, maka Grup menyusutkan aset hak-guna dari tanggal permulaan hingga tanggal yang lebih awal antara akhir umur manfaat aset hak-guna atau akhir masa sewa.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**z. Leases Transaction (continued)**

*The Group recognises a right-of-use asset and a leases liability at the leases commencement date. The right-of-use asset is initially measured at cost, which comprises the initial amount of the leases liability adjusted for any leases payment made at or before the commencement date, plus any initial direct cost incurred. The right-of-use asset is amortised over the straight-line method throughout the lease term.*

*The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease or, if that right cannot be readily determined, using incremental borrowing rate. Generally, the Group uses its incremental borrowing rate as a discount rate.*

*Each leases payment is allocated between the liability and finance cost. The finance cost is charged to profit or loss over the leases period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period.*

*The Group presents right-of-use assets as part of "Fixed assets" and leases liabilities as part of "Other liabilities" in the consolidated statement of financial position.*

*If the leases transfers ownership of the underlying asset to the Group by the end of the leases term or if the cost of the right-of-use asset reflects that the Group will exercise a purchase option, the Group depreciates the right-of-use asset from the commencement date to the end of the useful life of the underlying asset. Otherwise, the Group depreciates the right-of-use asset from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the leases term.*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**z. Transaksi Sewa (lanjutan)**

Grup menganalisa fakta dan keadaan untuk masing-masing jenis hak atas tanah dalam menentukan akuntansi untuk masing-masing hak atas tanah tersebut sehingga dapat merepresentasikan dengan tepat suatu kejadian atau transaksi ekonomik yang mendasarinya. Jika hak atas tanah tersebut tidak mengalihkan pengendalian atas aset pendasar kepada Grup, melainkan mengalihkan hak untuk menggunakan aset pendasar, Grup menerapkan perlakuan akuntansi atas transaksi tersebut sebagai sewa berdasarkan PSAK 73, "Sewa", kecuali jika hak atas tanah secara substansi menyerupai pembelian tanah, maka Grup menerapkan PSAK 16, "Aset tetap".

**Modifikasi sewa**

Grup mencatat modifikasi sewa sebagai sewa terpisah jika:

- modifikasi meningkatkan ruang lingkup sewa dengan menambahkan hak untuk menggunakan satu aset pendasar atau lebih;
- imbalan sewa meningkat sebesar jumlah yang setara dengan harga tersendiri untuk peningkatan dalam ruang lingkup dan penyesuaian yang tepat pada harga tersendiri tersebut untuk merefleksikan kondisi kontrak tertentu.

**aa. Pendapatan dan beban bunga dan syariah**

**Konvensional**

Pendapatan dan beban bunga untuk semua instrumen keuangan dengan *interest bearing* dicatat dalam pendapatan bunga dan beban bunga menggunakan metode suku bunga efektif.

Metode suku bunga efektif adalah metode yang digunakan untuk menghitung biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan dan metode untuk mengalokasikan pendapatan bunga atau beban bunga selama periode yang relevan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**z. Leases Transaction (continued)**

The Group analyses the facts and circumstances for each type of landrights in determining the accounting for each of these land rights so that it can accurately represent an underlying economic event or transaction. If the landrights do not transfer control of the underlying assets to the Group, but gives the rights to use the underlying assets, the Group applies the accounting treatment of these transactions as leases under SFAS 73, "Lease", except if landrights substantially similar to land purchases, the Group applies PSAK 16, "Property, plant and equipment".

**Leases modification**

The Group account for a leases modification as a separate leases if both:

- the modification increases the scope of the leases by adding the right to use one or more underlying assets;
- the consideration for the leases increases by an amount commensurate with the stand-alone price for the increase in scope and any appropriate adjustments to that stand-alone price to reflect the circumstances of the particular contract.

**aa. Interest income and expense and sharia**

**Conventional**

Interest income and expense for all interest bearing financial instruments are recorded within interest income and interest expense using the effective interest rate method.

The effective interest rate method is a method of calculating the amortised cost of a financial asset or a financial liability and method of allocating the interest income or interest expense over the relevant period.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**aa. Pendapatan dan beban bunga dan syariah (lanjutan)**

**Konvensional (lanjutan)**

Suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi pembayaran atau penerimaan kas di masa datang selama perkiraan umur dari instrumen keuangan, atau bilamana tepat, digunakan periode yang lebih singkat untuk memperoleh nilai tercatat bersih dari aset keuangan atau liabilitas keuangan. Pada saat menghitung suku bunga efektif, Grup mengestimasi arus kas dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, namun tidak mempertimbangkan kerugian kredit di masa datang. Perhitungan ini mencakup seluruh komisi, provisi, dan bentuk lain yang dibayarkan atau diterima oleh para pihak dalam kontrak yang merupakan bagian tak terpisahkan dari suku bunga efektif, biaya transaksi, dan seluruh premi atau diskon lainnya.

Jika aset keuangan atau kelompok aset keuangan serupa telah diturunkan nilainya sebagai akibat kerugian penurunan nilai, maka pendapatan bunga yang diperoleh setelahnya diakui atas bagian aset keuangan yang tidak mengalami penurunan nilai, berdasarkan suku bunga yang digunakan untuk mendiskonto arus kas masa datang dalam menghitung kerugian penurunan nilai.

Pendapatan bunga atas pinjaman yang diberikan atau aset produktif lainnya yang diklasifikasikan sebagai bermasalah diakui pada saat pendapatan tersebut diterima. Pada saat aset keuangan diklasifikasikan sebagai bermasalah, bunga yang telah diakui tetapi belum ditagih akan dibatalkan pengakuannya. Selanjutnya bunga yang dibatalkan tersebut diakui sebagai tagihan kontinjensi.

**Pendapatan dan beban syariah**

Pendapatan pengelolaan dana oleh Entitas Anak sebagai *mudharib* terdiri atas pendapatan dari jual dan beli transaksi *murabahah*, pendapatan bagi hasil dari *mudharabah* dan *musyarakah*, pendapatan dari sewa (*ijarah*) dan pendapatan usaha utama lainnya.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**aa. Interest income and expense and sharia (continued)**

**Conventional (continued)**

The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or, when appropriate, a shorter period to the net carrying amount of the financial asset or financial liability. When calculating the effective interest rate, Group estimates cash flows considering all contractual terms of the financial instrument, but does not consider future credit losses. The calculation includes all fees, commissions, and other fees paid or received between parties to the contract that are an integral part of the effective interest rate, transaction costs, and all other premiums or discounts.

Once a financial asset or a bank of similar financial assets has been written down as a result of an impairment loss, interest income is recognised on the unimpaired portion using the rate of interest used to discount the future cash flows for the purpose of measuring the impairment loss.

Interest income on loans or other earning assets classified as non-performing is recognised at the time the interest is received. When a financial asset is classified as non-performing, any interest income previously recognised but not yet collected is reversed against interest income. The reversed interest income is recognised as a contingent receivable.

**Sharia income and expense**

Revenue from fund management by Subsidiary as *mudharib* consists of income from sales and purchases of *murabahah* transactions, profit sharing from *mudharabah* and *musyarakah* financing, income from lease (*ijarah*) and other main operating income.



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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**aa. Pendapatan dan beban bunga dan syariah (lanjutan)**

**Pendapatan dan beban syariah (lanjutan)**

Entitas Anak menetapkan kebijakan tingkat risiko berdasarkan ketentuan internal. Entitas Anak melakukan penghentian amortisasi pendapatan ditangguhkan pada saat pembiayaan diklasifikasikan sebagai *non-performing*. Pendapatan Entitas Anak dari transaksi usaha yang diklasifikasikan sebagai *non-performing* dicatat sebagai pendapatan yang akan diterima pada laporan komitmen dan kontinjensi.

Pendapatan *ijarah* diakui selama masa akad menggunakan metode *flat* (proporsional).

Pendapatan bagi hasil *musyarakah* yang menjadi hak mitra pasif diakui dalam periode terjadinya hak bagi hasil sesuai *nisbah* yang disepakati.

Pendapatan bagi hasil *mudharabah* diakui dalam periode terjadinya hak bagi hasil sesuai *nisbah* yang disepakati dan tidak diperkenankan mengakui pendapatan dari proyeksi hasil usaha.

Pengakuan pendapatan atas piutang *murabahah* diakui pada laba rugi dengan menggunakan metode tingkat imbal hasil efektif.

Tingkat imbal hasil efektif merupakan metode alokasi pengakuan pendapatan dan merupakan tingkat imbal hasil yang secara tepat mendiskontokan estimasi penerimaan kas di masa depan selama perkiraan umur dari piutang *murabahah* untuk memperoleh biaya perolehan diamortisasi dari piutang *murabahah*. Pada saat menghitung tingkat imbal hasil efektif, Entitas Anak mengestimasi arus kas di masa datang dengan mempertimbangkan seluruh persyaratan kontraktual dalam piutang *murabahah* tersebut, tetapi tidak mempertimbangkan kerugian piutang di masa mendatang. Perhitungan ini mencakup seluruh komisi, provisi, dan bentuk lain yang diterima oleh para pihak dalam akad yang merupakan bagian tidak terpisahkan dari tingkat imbal hasil efektif, biaya transaksi, dan seluruh premi atau diskon lainnya.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**aa. Interest income and expense and sharia (continued)**

**Sharia income and expense (continued)**

The Subsidiary prescribes the risk rate policies based on the internal regulation. The Subsidiary leases the amortisation of deferred income at the time its financing is classified as *non-performing*. The Subsidiary's income from business transactions that are classified as *non-performing* is recorded as revenue to be received in the statement of commitments and contingencies.

Income from *ijarah* is recognised over the period of the contract with *flat* (proportional) method.

Profit sharing income for passive partner in *musyarakah* is recognised in the period when the right arises in accordance with *nisbah* (the agreed sharing ratio).

Profit sharing income from *mudharabah* is recognised in the period when the right arises in accordance with the agreed sharing ratio and the recognition based on projection of income is not allowed.

The revenue recognition of *murabahah* receivables are recognised in profit or loss using the effective rate of return method.

Effective rate of return is an allocation method of revenue recognition and the rate that exactly discounts the estimated future cash receipts through the expected life of the *murabahah* receivable to obtain the carrying amount of a *murabahah* receivable. When calculating the effective rate of return, the Subsidiary estimates future cash flows by considering all contractual terms of the *murabahah* receivable, but does not consider the loss of receivables in the future. This calculation includes all commissions, fees, and other forms received by the parties in a contract that are an integral part of the effective rate of return, transaction costs, and all other premiums or discounts.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**aa. Pendapatan dan beban bunga dan syariah (lanjutan)**

**Pendapatan dan beban syariah (lanjutan)**

Hak nasabah atas bagi hasil dana *syirkah* temporer merupakan bagian bagi hasil milik nasabah yang didasarkan pada prinsip *mudharabah* atas hasil pengelolaan dana mereka oleh Entitas Anak. Pendapatan yang dibagikan adalah kas yang telah diterima (*cash basis*) dari bagi hasil.

Pembagian hasil usaha dilakukan berdasarkan prinsip bagi hasil usaha yaitu dari laba kotor Entitas Anak (*gross profit margin*).

Pendapatan margin dan bagi hasil atas pembiayaan yang diberikan dan atas aset produktif lainnya akan dibagikan kepada nasabah penyimpan dana dan Entitas Anak sesuai dengan proporsi dana yang dipakai dalam pembiayaan yang diberikan dan aset produktif lainnya. Pendapatan margin dan bagi hasil yang tersedia untuk nasabah tersebut kemudian dibagikan ke nasabah penabung dan deposan sebagai *shahibul maal* dan Entitas Anak sebagai *mudharib* sesuai porsi *nisbah* bagi hasil yang telah disepakati bersama sebelumnya. Pendapatan margin dan bagi hasil dari pembiayaan dan aset produktif lainnya yang memakai dana Entitas Anak, seluruhnya menjadi milik Entitas Anak, termasuk pendapatan dari investasi bank berbasis imbalan.

**ab. Pendapatan provisi dan komisi**

Provisi dan komisi yang berkaitan langsung dengan kegiatan pemberian pinjaman diakui sebagai bagian/(pengurang) dari biaya perolehan pinjaman dan akan diakui sebagai pendapatan bunga dengan cara diamortisasi berdasarkan metode suku bunga efektif.

Pendapatan provisi dan komisi yang tidak berkaitan dengan kegiatan pemberian pinjaman atas suatu jangka waktu diakui sebagai pendapatan pada saat terjadinya transaksi sebagai pendapatan operasional lainnya.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**aa. Interest income and expense and sharia (continued)**

**Sharia income and expense (continued)**

*Third parties' share on returns of temporary syirkah funds represents customer's share on the Subsidiary's income derived from the management of their funds by the Subsidiary under mudharabah principles. Income that will be distributed is the cash received (cash basis) from the share.*

*The distribution of revenue is based on profit sharing scheme on the Subsidiary's gross profit margin.*

*Margin income and profit sharing on financing facilities and other earning assets are distributed to fund owners and the Subsidiary based on proportion of fund used in the financing and other earning assets. Margin income and profit sharing income allocated to the fund owners are then distributed to fund owners as shahibul maal and the Subsidiary as mudharib based on a predetermined ratio (nisbah). Margin income and profit sharing from financing facilities and other earning assets using the Subsidiary's funds, are entirely shared for the Subsidiary, including income from the Subsidiary's fee-based transactions.*

**ab. Fees and commissions income**

*Fees and commissions income directly related to lending activities, are recognised as a part/(deduction) of lending cost and will be recognised as interest income by amortising the carrying value of loan with effective interest rate method.*

*Fees and commissions income which are not related to lending activities on a specific period are recognised as income incurred at the transaction date as other operating income.*

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**ac. Pendapatan dan beban operasional lainnya**

**Beban tenaga kerja**

Beban tenaga kerja meliputi beban berupa gaji karyawan, bonus, lembur dan tunjangan.

**Beban umum dan administrasi**

Beban umum dan administrasi merupakan beban yang timbul sehubungan dengan aktivitas kantor dan operasional Grup.

Seluruh pendapatan dan beban yang terjadi dibebankan sebagai laba/rugi pada saat terjadinya.

**ad. Perpajakan**

Beban pajak terdiri dari pajak kini dan pajak tangguhan. Pajak diakui dalam laporan laba rugi konsolidasian, kecuali jika pajak tersebut terkait dengan transaksi atau kejadian yang langsung diakui di pendapatan komprehensif lain atau langsung diakui ke ekuitas. Dalam hal ini, pajak tersebut masing-masing diakui dalam pendapatan komprehensif lain atau ekuitas.

Manajemen secara periodik mengevaluasi posisi yang dilaporkan di Surat Pemberitahuan Tahunan ("SPT") sehubungan dengan situasi dimana aturan pajak yang berbeda membutuhkan interpretasi. Jika perlu, manajemen menentukan provisi berdasarkan jumlah yang diharapkan akan dibayar kepada otoritas pajak.

Pajak penghasilan tangguhan disajikan dengan menggunakan metode liabilitas. Pajak penghasilan tangguhan timbul akibat perbedaan temporer antara aset dan liabilitas menurut ketentuan-ketentuan pajak dengan nilai tercatat aset dan liabilitas dalam laporan keuangan konsolidasian. Tarif pajak yang berlaku atau yang secara substansial telah berlaku digunakan dalam menentukan besarnya jumlah pajak penghasilan tangguhan.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**ac. Other operating income and expenses**

**Personnel expenses**

Personnel expenses include expenses related with salaries for employees, bonuses, overtime and allowances.

**General and administrative expenses**

General and administrative expenses represent expenses related to office activities and Group operational activities.

All of these income and expenses are recorded as profit/loss when incurred.

**ad. Taxation**

The tax expense comprises of current and deferred tax. Tax is recognised in the consolidated profit or loss, except to the extent that it relates to items recognised directly in other comprehensive income or in equity. In this case, the tax is also recognised in other comprehensive income or in equity, respectively.

Management periodically evaluates positions taken in tax return with respect to situations in which applicable tax regulation is subject to interpretation. It establishes provision where appropriate, on the basis of amounts expected to be paid to the tax authorities.

Deferred income tax is provided using the liability method. Deferred income tax on temporary differences arising between the tax base of assets and liabilities and their carrying amounts in the consolidated financial statements. Currently enacted or substantially enacted tax rates are used in the determination of deferred income tax.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**ad. Perpajakan (lanjutan)**

Aset pajak tangguhan diakui apabila terdapat kemungkinan besar bahwa jumlah laba fiskal di masa mendatang akan memadai untuk mengkompensasi perbedaan temporer yang menimbulkan aset pajak tangguhan tersebut. Aset dan liabilitas pajak penghasilan tangguhan dapat saling hapus apabila terdapat hak yang berkekuatan hukum untuk melakukan saling hapus antara aset pajak kini dengan liabilitas pajak kini dan apabila aset dan pajak penghasilan tangguhan dikenakan oleh otoritas perpajakan yang sama dan adanya niat untuk melakukan penyelesaian saldo secara neto.

Taksiran pajak penghasilan Grup dihitung untuk masing-masing perusahaan sebagai badan hukum terpisah. Aset pajak kini dan liabilitas pajak kini untuk badan hukum yang berbeda tidak disalinghapuskan dalam laporan keuangan konsolidasian.

**ae. Imbalan kerja**

**Imbalan kerja jangka pendek**

Imbalan kerja jangka pendek diakui pada saat terutang kepada karyawan.

**Liabilitas imbalan kerja karyawan**

Grup memiliki program pensiun sesuai dengan peraturan dan perundang-undangan yang berhubungan dengan ketenagakerjaan atau kebijakan yang ditetapkan oleh Grup. Program ini pada umumnya didanai melalui pembayaran kepada pengelola dana pensiun yang besarnya ditentukan dalam perhitungan aktuarial yang dilakukan secara berkala.

Grup harus menyediakan program pensiun dengan jumlah minimal tertentu sesuai dengan UU Cipta Kerja No. 11/2020 (2020: Undang-Undang (UU) Ketenagakerjaan No. 13/2003). Karena UU Ketenagakerjaan menentukan rumus tertentu untuk menghitung jumlah minimal imbalan pensiun, maka pada dasarnya program pensiun berdasarkan UU Ketenagakerjaan adalah program manfaat pasti. Program pensiun manfaat pasti adalah program pensiun yang menentukan jumlah imbalan pensiun yang akan diberikan, biasanya didasarkan pada satu faktor atau lebih seperti usia, masa kerja atau jumlah kompensasi.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**ad. Taxation (continued)**

*Deferred tax assets are recognised to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilised. Deferred Income tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets against current tax liabilities and when deferred income taxes assets and liabilities relate to income taxes levied by the same taxation authority where tax is an intention to settle the balance on a net basis.*

*The estimated corporate income tax of Group is calculated for each company as a separate legal entity. Current tax assets and current tax liabilities for different legal entities can not be net-off in the consolidated financial statements.*

**ae. Employee benefits**

**Short term employee benefits**

*Short term employee benefits are recognised when they are accrued to the employees.*

**Employee benefits obligation**

*The Group have pension scheme in accordance with prevailing labor-related laws and regulations of Group's policies. The scheme is generally funded through payments to trustee-administered funds as determined by periodic actuarial calculations.*

*The Group are required to provide a minimum amount of pension benefits in accordance with Job Creation Law Art No.11/2020 (2020: Labor Law No. 13/2003). Since the Labor Law sets the formula for determining the minimum amount of benefits, in substance pension plans under the Labor Law represent defined benefit plans. A defined benefit plan is a pension plan that defines an amount of pension benefit to be provided, usually as a function of one or more factors such as age, years of service or total compensation.*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**ae. Imbalan kerja (lanjutan)**

**Liabilitas imbalan kerja karyawan (lanjutan)**

Liabilitas diakui pada laporan posisi keuangan sebesar nilai kini kewajiban imbalan pasti pada akhir periode pelaporan dikurangi nilai wajar aset program. Kewajiban imbalan pasti dihitung setiap tahun oleh aktuaris yang independen dengan menggunakan metode *projected unit credit*. Nilai kini kewajiban imbalan pasti ditentukan dengan mendiskontokan arus kas keluar yang diestimasi dengan menggunakan tingkat bunga Obligasi Pemerintah (dikarenakan saat ini tidak ada pasar aktif untuk obligasi perusahaan yang berkualitas tinggi) yang didenominasikan dalam Rupiah dimana imbalan akan dibayarkan dan memiliki jangka waktu jatuh tempo mendekati jangka waktu kewajiban pensiun.

Keuntungan dan kerugian aktuarial yang timbul dari penyesuaian dan perubahan dalam asumsi-asumsi aktuarial langsung diakui seluruhnya melalui pendapatan komprehensif lainnya pada saat terjadinya.

Biaya jasa lalu diakui segera dalam laporan laba rugi konsolidasian. Keuntungan dan kerugian dari kurtailmen atau penyelesaian program manfaat pasti diakui di laba rugi konsolidasian ketika kurtailmen atau penyelesaian tersebut terjadi.

**Pesangon pemutusan kontrak kerja**

Pesangon pemutusan kontrak terhutang ketika karyawan diberhentikan sebelum usia pensiun normal.

Grup mengakui pesangon pemutusan kontrak kerja ketika Grup menunjukkan komitmennya untuk memutuskan hubungan kerja dengan karyawan berdasarkan suatu rencana formal terperinci yang kecil kemungkinannya untuk dibatalkan. Pesangon yang akan dibayarkan dalam waktu lebih dari 12 (dua belas) bulan setelah tanggal laporan posisi keuangan didiskontokan untuk mencerminkan nilai kini.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**ae. Employee benefits (continued)**

**Employee benefits obligation (continued)**

The liability recognised in the statement of financial position is the present value of the defined benefit obligation at the end of the reporting period less the fair value of plan assets. The defined benefit obligation is calculated annually by independent actuaries using the projected unit credit method. The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of Government Bonds (considering currently there is no deep market for high-quality corporate bonds) that are denominated in Rupiah in which the benefits will be paid, and that have terms to maturity approximating to the terms of the related pension obligation.

Actuarial gains and losses arising from experience adjustments and changes in actuarial assumptions charged or credited to equity in other comprehensive income in the period in which they arise.

Past-service costs are recognised immediately in the consolidated statement of profit or loss. Gains or losses on the curtailment or settlement of a defined benefit plan are recognised in the consolidated statement of profit or loss when the curtailment or settlement occurs.

**Termination benefits**

Termination benefits are payable whenever an employee's employment is terminated before the normal retirement age.

The Group recognise termination benefits when it is demonstrably committed to terminate the employment of current employees according to a detailed formal plan which has small probability to withdraw. Benefits, due more than 12 (twelve) months after statement of financial position's date are discounted to present value.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG  
SIGNIFIKAN (lanjutan)**

**af. Laba per saham**

Laba per saham dasar dihitung dengan membagi laba bersih konsolidasian dengan rata-rata tertimbang jumlah saham biasa yang beredar pada periode yang bersangkutan.

Laba per saham dilusian dihitung dengan membagi laba bersih konsolidasian dengan rata-rata tertimbang jumlah saham yang beredar ditambah dengan rata-rata tertimbang jumlah saham yang akan diterbitkan atas konversi efek yang berpotensi saham yang bersifat dilutif.

**ag. Penjabaran mata uang asing**

Laporan keuangan disajikan dalam mata uang Rupiah, yang merupakan mata uang fungsional dan penyajian Grup. Transaksi dalam mata uang asing dijabarkan ke mata uang Rupiah dengan menggunakan kurs yang berlaku pada tanggal transaksi tersebut. Pada setiap tanggal pelaporan, aset dan liabilitas moneter dalam mata uang asing dijabarkan ke mata uang Rupiah dengan kurs penutupan Bank Indonesia pada pukul 16:00 Waktu Indonesia Barat yang berlaku pada tanggal pelaporan.

Keuntungan dan kerugian selisih kurs yang timbul dari transaksi dalam mata uang asing dan penjabaran aset dan kewajiban moneter dalam mata uang asing, diakui dalam laporan laba rugi konsolidasian.

Berikut ini adalah kurs mata uang asing utama yang digunakan pada tanggal-tanggal 31 Desember 2021 dan 2020 yang menggunakan kurs tengah Reuters pukul 16:00 Waktu Indonesia Barat (nilai penuh):

**2. SUMMARY OF SIGNIFICANT ACCOUNTING  
POLICIES (continued)**

**af. Earnings per share**

*Basic earnings per share is computed by dividing consolidated net income with the weighted average number of common shares outstanding during the period.*

*Diluted earnings per share is calculated by dividing consolidated net income by the weighted average number of shares outstanding plus the weighted average number of shares outstanding which would be issued on the conversion of the dilutive potential shares.*

**ag. Foreign currency translation**

*The financial statements are presented in Rupiah, which is the functional and presentation currency of the Group. Transactions denominated in a foreign currency are converted into Rupiah at the exchange rate prevailing at the date of the transaction. As at each reporting date, monetary assets and liabilities in foreign currencies are translated into Rupiah using the Bank Indonesia closing exchange rate at 16:00 Western Indonesian Time prevailing at reporting date.*

*Exchange gains and losses arising on transactions in foreign currencies and on the translation of foreign currency monetary assets and liabilities are recognised in the consolidated statement of profit or loss.*

*Below are the major exchange rates used as of December 31, 2021 and 2020 using the Reuters' middle rates at 16:00 Western Indonesian Time (full amount):*

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**ag. Penjabaran mata uang asing (lanjutan)**

**ag. Foreign currency translation (continued)**

	31 Desember/December 31,		
	2021	2020	
Poundsterling Inggris	19.251	19.012	Great Britain Poundsterling
Euro Eropa	16.112	17.234	European Euro
Franc Swiss	15.585	15.901	Swiss Franch
Dolar Amerika Serikat	14.253	14.050	United States Dollar
Dolar Kanada	11.193	10.981	Canadian Dollar
Dolar Singapura	10.555	10.606	Singapore Dollar
Dolar Australia	10.347	10.752	Australian Dollar
Dolar New Zealand	9.732	10.088	New Zealand Dollar
Riyal Arab	3.796	3.745	Saudi Riyal
Ringgit Malaysia	3.418	3.481	Malaysian Ringgit
Yuan China	2.236	2.150	Chinese Yuan
Dolar Hongkong	1.828	1.812	Hongkong Dollar
Dolar Taiwan	513	500	New Taiwan Dollar
Baht Thailand	429	468	Thailand Baht
Yen Jepang	124	136	Japanese Yen
Won Korea	12	13	Korean Won

**ah. Transaksi dengan pihak berelasi**

**ah. Transactions with related parties**

Grup melakukan transaksi dengan pihak berelasi. Sesuai dengan PSAK No. 7 tentang "Pengungkapan Pihak-pihak yang Berelasi", yang dimaksud dengan pihak yang berelasi adalah orang atau entitas yang berelasi dengan entitas pelapor sebagai berikut:

The Group has transactions with related parties. In accordance with SFAS No. 7 regarding "Related Party Disclosure", the meaning of a related party is a person or entity that is related to a reporting entity as follow:

- a. Orang atau anggota keluarga terdekatnya berelasi dengan entitas pelapor jika orang tersebut:
  - i. memiliki pengendalian atau pengendalian bersama terhadap entitas pelapor;
  - ii. memiliki pengaruh signifikan terhadap entitas pelapor; atau
  - iii. personal manajemen kunci entitas pelapor atau entitas induk pelapor.
- b. Suatu entitas berelasi dengan entitas pelapor jika memenuhi hal-hal sebagai berikut:
  - i. entitas dan entitas pelapor adalah anggota dari kelompok usaha yang sama (artinya entitas induk, entitas anak, dan entitas anak berikutnya terkait dengan entitas lain);

- a. A person or a close member of that person's family is related to a reporting entity if:
  - i. has control or joint control over the reporting entity;
  - ii. has significant influence over the reporting entity; or
  - iii. is member of the key management personnel of the reporting entity or a parent of the reporting entity.
- b. An entity is related to a reporting entity if any of the following conditions applies:
  - i. the entity and the reporting entity are member of the same the company (which means that each parent, subsidiary, and fellow subsidiary is related to the others);



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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**ah. Transaksi dengan pihak berelasi (lanjutan)**

- ii. suatu entitas adalah entitas asosiasi atau ventura bersama bagi entitas lain (atau entitas asosiasi atau ventura bersama yang merupakan anggota suatu kelompok usaha, di mana entitas lain tersebut adalah anggotanya);
- iii. kedua entitas tersebut adalah ventura bersama dari pihak ketiga yang sama;
- iv. suatu entitas adalah ventura bersama dari entitas ketiga dan entitas yang lain adalah entitas asosiasi dari entitas ketiga;
- v. entitas tersebut adalah suatu program imbalan pasca kerja untuk imbalan kerja dari suatu entitas pelapor atau entitas yang terkait dengan entitas pelapor;
- vi. entitas yang dikendalikan atau dikendalikan bersama oleh orang yang diidentifikasi dalam butir (a); atau
- vii. orang yang diidentifikasi, dalam butir (a) (i) memiliki pengaruh signifikan terhadap entitas atau anggota manajemen kunci entitas (atau entitas induk dari entitas).

**ai. Pelaporan segmen**

Sebuah segmen operasi adalah suatu komponen dari entitas:

- a. yang terlibat dalam aktivitas bisnis yang memperoleh pendapatan dan menimbulkan beban (termasuk pendapatan dan beban yang terkait dengan transaksi dengan komponen lain dari entitas yang sama);
- b. hasil operasinya dikaji ulang secara reguler oleh kepala operasional untuk membuat keputusan tentang sumber daya yang dialokasikan pada segmen tersebut dan menilai kinerjanya; dan
- c. tersedia informasi keuangan yang dapat dipisahkan.

Grup menyajikan segmen operasi berdasarkan informasi yang disiapkan secara internal untuk pengambil keputusan operasional. Berdasarkan PSAK 5, sebuah segmen usaha adalah sekelompok aset dan operasi yang menyediakan barang atau jasa yang memiliki risiko serta tingkat pengembalian yang berbeda dengan segmen usaha lainnya.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**ah. Transactions with related parties (continued)**

- ii. one entity is an associate or joint venture of the other entity (or an associate or joint venture of member of a company of which the other entity is a member);
- iii. both entities are joint ventures of the same third party;
- iv. one entity is a joint venture of a third entity and the other entity is an associate of the third entity;
- v. the entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity;
- vi. the entity controlled or jointly controlled by a person identified in (a); or
- vii. a person identified in (a) (i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).

**ai. Segment reporting**

An operating segment is a component of entity which:

- a. involves with business activities to generate income and expenses (include income and expenses relating to the transactions with other components with the same entity);
- b. operations result is observed regularly by chief decision maker to make decisions regarding the allocation of resources and to evaluate the works; and
- c. separated financial information is available.

Group presents operating segments based on the information that internally is provided to the chief operating decision maker. Under SFAS 5, a business segment is a bank of assets and operations engaged in providing products or services that are subject to risks and returns that are difference from those of other business segments.

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**2. IKHTISAR KEBIJAKAN AKUNTANSI YANG SIGNIFIKAN (lanjutan)**

**ai. Pelaporan segmen (lanjutan)**

Segmen operasi Grup disajikan berdasarkan bank umum - konvensional dan bank syariah.

Segmen geografis adalah komponen Grup yang dapat dibedakan dalam menghasilkan jasa pada lingkungan (wilayah) ekonomi tertentu dan komponen itu memiliki risiko dan imbalan yang berbeda dengan risiko dan imbalan pada komponen yang beroperasi pada lingkungan (wilayah) ekonomi lain. Grup melaporkan segmen geografis berdasarkan daerah Jadetabek, Jawa Barat, Jawa Tengah dan Jawa Timur dan Luar Jawa.

**3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING**

Beberapa estimasi dan asumsi dibuat dalam rangka penyusunan laporan keuangan konsolidasian dimana dibutuhkan pertimbangan manajemen dalam menentukan metodologi yang tepat untuk penilaian aset dan liabilitas.

Manajemen membuat estimasi dan asumsi yang berimplikasi pada pelaporan nilai aset dan liabilitas atas tahun keuangan satu tahun kedepan. Semua estimasi dan asumsi yang diharuskan oleh PSAK adalah estimasi terbaik yang didasarkan standar yang berlaku. Estimasi dan pertimbangan dievaluasi secara terus menerus dan berdasarkan pengalaman masa lalu dan faktor-faktor lain termasuk harapan atas kejadian yang akan datang.

Walaupun estimasi dan asumsi ini dibuat berdasarkan pengetahuan terbaik manajemen atas kejadian dan tindakan saat ini, hasil yang timbul mungkin berbeda dengan estimasi dan asumsi semula.

**Cadangan kerugian penurunan nilai aset keuangan**

Sesuai dengan PSAK 71, pengukuran cadangan kerugian penurunan nilai aset keuangan yang diukur pada biaya perolehan diamortisasi dan diukur pada nilai wajar melalui penghasilan komprehensif lain membutuhkan penggunaan model yang kompleks dan asumsi signifikan terkait *future economic conditions* dan *credit behaviour*.

**2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**ai. Segment reporting (continued)**

The Group's operating segments are presented by commercial banks - conventional and sharia bank.

A geographical segment is a distinguishable component of the Group that is engaged in providing services within a particular economic environment and that is subject to risks and returns that are different from those operating in other economic environments. The Group report geographical segment information based on Jadetabek, West Java, Central and East Java and Non Java.

**3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS**

Certain estimates and assumption are made in the presentation of the consolidated financial statements. These often require management judgement in determining the appropriate methodology for valuation of assets and liabilities.

Management makes estimates and assumptions that affect the reported amounts of assets and liabilities within the next financial year. All estimates and assumptions required in conformity with SFAS are best estimates undertaken in accordance with the applicable standard. Estimates and judgements are evaluated on a continuous basis, and are based on past experience and other factors, including expectations with regard to future events.

Although these estimates and assumption are based on management's best knowledge of current events and activities, actual result may differ from those estimates and assumption.

**Allowance for impairment losses of financial assets**

According to SFAS 71, the measurement of the expected credit loss allowance for financial assets measured at amortised cost and at fair value through other comprehensive income is an area that requires the use of complex models and significant assumptions about future economic conditions and credit behavior.

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**3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN  
AKUNTANSI YANG PENTING (lanjutan)**

**Cadangan kerugian penurunan nilai aset  
keuangan**

Estimasi signifikan dibutuhkan dalam menerapkan perhitungan cadangan kerugian penurunan nilai berdasarkan PSAK 71, antara lain:

- Penentuan kriteria *Significant Increase in Credit Risk*;
- Menentukan model yang tepat dan asumsi untuk perhitungan cadangan kerugian penurunan nilai;
- Menentukan jumlah dan pembebanan relatif atas skenario *forward-looking* untuk masing-masing segmen/produk;
- Menentukan segmentasi aset keuangan yang sejenis untuk perhitungan cadangan kerugian penurunan nilai;
- Estimasi arus kas debitor dalam perhitungan individual *impairment*.

Lihat Catatan 2g untuk kebijakan akuntansi atas penurunan nilai aset keuangan.

**Cadangan kerugian penurunan nilai atas aset  
produktif (untuk Entitas Anak berbasis syariah)**

Aset produktif terdiri dari giro pada Bank Indonesia dan penempatan pada Bank Indonesia dalam bentuk Fasilitas Simpanan Bank Indonesia Syariah ("FASBIS"), giro pada bank lain, penempatan pada bank lain, investasi pada efek-efek, pembiayaan *mudharabah*, pembiayaan *musyarakah*, aset yang diperoleh untuk *ijarah*, serta komitmen dan kontinjensi yang berisiko kredit.

Sesuai dengan Peraturan Bank Indonesia ("PBI"), Bank mengklasifikasikan aset produktif ke dalam satu dari lima kategori dan aset nonproduktif ke dalam satu dari empat kategori. Aset produktif tidak bermasalah (*performing*) diklasifikasikan sebagai "Lancar" dan "Dalam Perhatian Khusus", sedangkan aset produktif bermasalah (*non-performing*) diklasifikasikan kedalam tiga kategori yaitu: "Kurang Lancar", "Diragukan" dan "Macet". Kategori untuk aset non-produktif terdiri dari "Lancar", "Kurang Lancar", "Diragukan" dan "Macet".

**3. USE OF SIGNIFICANT ACCOUNTING  
ESTIMATES AND JUDGEMENTS (continued)**

**Allowance for impairment losses of financial  
assets**

Significant estimates are required in applying the SFAS 71 requirements for measuring allowance for impairment losses, such as:

- Determining criteria for *Significant Increase in Credit Risk*;
- Choosing appropriate models and assumptions for the measurement of allowance for impairment losses;
- Establishing the number and relative weightings of forward-looking scenarios for each type of segment/product;
- Establishing groups of similar financial assets for the purposes of measuring allowance for impairment losses;
- Estimate debtor's cash flow in the calculation of individual impairment.

Refer to Note 2g for accounting policy on impairment of financial assets.

**Allowance for impairment losses on earning  
assets (for Subsidiary with Sharia based)**

Earning assets consist of current accounts with Bank Indonesia, placements with Bank Indonesia in the form of Bank Indonesia Sharia Deposit Facilities ("FASBIS"), current accounts with other banks, placements with other banks, marketable securities, *mudharabah* and *musyarakah* financing, assets acquired for *ijarah*, and commitments and contingencies which carry credit risk.

In accordance with Bank Indonesia Regulations ("PBI"), the Bank classifies earning assets into one of five categories and non-earning assets into one of four categories. Performing earning assets categorised as "Current" and "Special Mention", while non-performing earning assets are categorised into three categories: "Substandard", "Doubtful", and "Loss". Non-Earning assets are divided into "Current", "Substandard", "Doubtful", and "Loss".

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**3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN  
AKUNTANSI YANG PENTING (lanjutan)**

**Cadangan kerugian penurunan nilai atas aset  
produktif (untuk Entitas Anak berbasis syariah)  
(lanjutan)**

Penilaian kualitas aset bank umum berdasarkan prinsip syariah diatur dalam Peraturan Otoritas Jasa Keuangan ("POJK") No.19/POJK.03/2018 tanggal 20 September 2018 tentang "Penilaian Kualitas Aset Bank Umum Syariah dan Unit Usaha Syariah".

**Agunan yang diambil alih**

Agunan yang diambil alih diukur sebesar nilai yang lebih rendah antara nilai tercatat dan nilai bersih yang dapat direalisasi. Nilai bersih yang dapat direalisasi adalah nilai wajar agunan yang diambil alih dikurangi dengan estimasi biaya untuk menjual agunan tersebut. Selisih lebih saldo kredit di atas nilai bersih yang dapat direalisasi dari agunan yang diambil alih dibebankan ke dalam akun cadangan kerugian penurunan nilai aset non keuangan.

Kondisi agunan yang diambil alih dievaluasi secara individu berdasarkan estimasi terbaik manajemen atas nilai kini arus kas yang diharapkan akan diterima. Dalam mengestimasi nilai bersih yang dapat direalisasi tersebut, manajemen membuat pertimbangan berdasarkan nilai realisasi bersih dari setiap agunan berdasarkan hasil penilaian dari penilai independen dan estimasi waktu dan arus kas yang diterima dari penjualan aset tersebut. Setiap aset yang mengalami penurunan nilai dinilai sesuai dengan kondisi, dan strategi penyelesaian serta estimasi arus kas yang diperkirakan dapat diterima.

**Imbalan kerja karyawan**

Nilai kini atas imbalan kerja karyawan tergantung dari banyaknya faktor yang dipertimbangkan oleh aktuaris berdasarkan beberapa asumsi. Perubahan atas asumsi-asumsi tersebut akan mempengaruhi nilai tercatat atas imbalan kerja karyawan.

**3. USE OF SIGNIFICANT ACCOUNTING  
ESTIMATES AND JUDGEMENTS (continued)**

**Allowance for impairment losses on earning  
assets (for Subsidiary with Sharia based)  
(continued)**

The assessment of asset quality of commercial banks under sharia principle is regulated by Otoritas Jasa Keuangan Regulations ("POJK") No.19/POJK.03/2018 dated September 20, 2018 regarding "Assessment of the Quality of Assets of Sharia Commercial Bank and Sharia Business Unit".

**Foreclosed assets**

Foreclosed assets are stated at lower amount of carrying amount and net realisable value. Net realisable value is the fair value of the foreclosed assets less the estimated costs to sell the assets. The excess of loan receivable over the net realisable value of the foreclosed assets is charged to allowance for impairment losses on non financial assets.

The specific condition of foreclosed assets is individually evaluated based on management's best estimate of the present value of the expected cash flows to be received. In estimating these cash flows, management makes judgements about the net realisable value of each foreclosed asset based the result of independent appraisal and estimated time and cash received from selling the foreclosed assets. Each impaired assets will be measured based on its merits, and the workout strategy and estimated cash flows considered recoverable.

**Employee benefit**

The present value of the employee benefit obligations depends on a number of factors that are determined on an actuarial basis using a number of assumptions. Any changes in these assumptions will impact the carrying amount of employee benefit obligations.

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**3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN  
AKUNTANSI YANG PENTING (lanjutan)**

**Imbalan kerja karyawan (lanjutan)**

Asumsi yang digunakan dalam menentukan biaya atau pendapatan untuk imbalan kerja termasuk tingkat diskonto. Grup menentukan tingkat diskonto yang tepat pada setiap akhir tahun. Ini merupakan tingkat suku bunga yang digunakan untuk menentukan nilai kini atas arus kas masa depan yang diestimasi akan digunakan untuk membayar imbalan kerja. Dalam menentukan tingkat diskonto yang tepat, Grup mempertimbangkan tingkat suku bunga atas Obligasi Pemerintah yang mempunyai jatuh tempo yang menyerupai jangka waktu imbalan kerja karyawan.

Asumsi kunci liabilitas pensiun lainnya sebagian ditentukan berdasarkan kondisi pasar saat ini (lihat Catatan 24).

**Penentuan nilai wajar**

Dalam menentukan nilai wajar atas aset keuangan dan liabilitas keuangan dimana tidak terdapat harga pasar yang dapat diobservasi, Grup harus menggunakan teknik penilaian seperti dijelaskan pada Catatan 2d.

Informasi mengenai penentuan nilai wajar dari instrumen keuangan diungkapkan pada Catatan 47.

Dalam mengukur nilai wajar atas aset dan liabilitas non-keuangan, Grup menggunakan data pasar yang dapat diobservasi jika memungkinkan.

**Perpajakan**

Pertimbangan signifikan dilakukan dalam menentukan provisi atas pajak penghasilan badan dan pajak lainnya. Terdapat transaksi dan perhitungan tertentu yang penentuan pajak akhirnya adalah tidak pasti dalam kegiatan usaha normal. Grup mengakui liabilitas pajak penghasilan badan dan pajak lainnya berdasarkan estimasi apakah akan terdapat tambahan pajak penghasilan badan dan pajak lainnya.

**3. USE OF SIGNIFICANT ACCOUNTING  
ESTIMATES AND JUDGEMENTS (continued)**

**Employee benefit (continued)**

The assumptions used in determining the net cost (income) for employee benefits include the discount rate. The Group determines the appropriate discount rate at the end of each year. This is the interest rate that should be used to determine the present value of estimated future cash outflows expected to be required to settle the pension obligations. In determining the appropriate discount rate, the Group considers the interest rates of Government Bonds that have terms to maturity approximating the terms of the related employee benefit liability.

Other key assumptions for pension obligations are partly based on current market conditions (refer to Note 24).

**Determining fair values**

The determining of fair value for financial assets and financial liabilities for which there is no observable market price requires the Group must use of valuation techniques as described in Note 2d.

Information about the determination of fair value of financial instruments is disclosed in Note 47.

When measuring the fair value for non-financial assets and liabilities, the Group uses observable market data to extent possible.

**Taxation**

Significant consideration is made in determining the provision of corporate income tax and other taxes. There are certain transactions and calculations that the final tax determination is uncertain in the normal course of business. The Group recognised liability for corporate income tax and other taxes based on an estimate whether there would be an additional corporate income tax and other taxes

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**3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN  
AKUNTANSI YANG PENTING (lanjutan)**

**Aset Pajak Tangguhan**

Aset pajak tangguhan diakui atas seluruh perbedaan temporer yang dapat dikurangkan, sepanjang besar kemungkinannya bahwa penghasilan kena pajak akan tersedia sehingga perbedaan temporer tersebut dapat digunakan. Estimasi signifikan oleh manajemen disyaratkan dalam menentukan jumlah aset pajak tangguhan yang dapat diakui, berdasarkan saat penggunaan dan tingkat penghasilan kena pajak serta strategi perencanaan pajak masa depan. Bank tidak memperhitungkan sebagian manfaat aset pajak tangguhan karena manajemen Bank berpendapat bahwa aset pajak tangguhan tersebut tidak dapat terpulihkan di masa yang akan datang.

**Menentukan jangka waktu kontrak dengan opsi perpanjangan dan penghentian kontrak - Grup sebagai lessee**

Grup menentukan jangka waktu sewa sebagai jangka waktu sewa yang tidak dapat dibatalkan, bersama dengan periode yang dicakup oleh opsi untuk memperpanjang masa sewa jika dipastikan akan dilaksanakan, atau periode apa pun yang dicakup oleh opsi untuk menghentikan sewa, jika cukup wajar untuk tidak dilakukan.

Grup memiliki beberapa kontrak sewa yang mencakup opsi perpanjangan dan penghentian jangka waktu sewa. Grup menerapkan penilaian dalam mengevaluasi apakah dapat dipastikan jika akan menggunakan opsi untuk memperpanjang atau menghentikan sewa. Hal tersebut dilakukan dengan mempertimbangkan seluruh fakta dan keadaan yang relevan yang memberikan insentif ekonomi untuk melakukan perpanjangan atau penghentian sewa. Setelah tanggal dimulainya, Grup menilai kembali masa sewa, jika terdapat peristiwa atau perubahan signifikan dalam keadaan yang berada dalam kendali dan mempengaruhi apakah lessee cukup pasti untuk mengeksekusi opsi memperpanjang atau menghentikan sewa.

**3. USE OF SIGNIFICANT ACCOUNTING  
ESTIMATES AND JUDGEMENTS (continued)**

**Deferred tax assets**

*Deferred tax assets are recognised for all deductible temporary differences, as long as it is likely that taxable income will be available so that the temporary differences can be utilised. Significant estimates by management are required in determining the amount of deferred tax assets that can be recognised, based on utilisation and the level of taxable income and future tax planning strategies. The Bank does not take into account some of the benefits of deferred tax assets as management believes that deferred tax assets will not be recoverable in the future.*

**Determine the contract term with options for extension and termination of the contract - the Group as lessee**

*The Group determines the lease term as the term of the lease that cannot be cancelled, together with the period covered by the option to extend the lease if it is determined to be exercised, or any period covered by the option to terminate the lease, if it is reasonably reasonable not to do so.*

*The Group has several lease contracts that include options for extension and termination of the lease terms. The Group applies its judgment in evaluating whether it is certain to exercise the option to extend or terminate the lease. This is done by considering all relevant facts and circumstances that provide economic incentives to extend or terminate the lease. After the commencement date, the Group reassesses the lease term, if there is a significant event or change in circumstances which is under its control and affects whether the lessee is certain enough to exercise the option to extend or terminate the lease.*

The original consolidated financial statements included herein are in Indonesian language.

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**4. KAS**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Kas dalam <i>keasahan</i>			Cash in vault
Rupiah	51.774.320	46.188.173	Rupiah
Mata uang asing			Foreign currency
Dolar Amerika Serikat	1.523.735	14.988.737	United States Dollar
Ringgit Malaysia	99.058	92.227	Malaysian Ringgit
Dolar Australia	36.213	84.084	Australian Dollar
Euro Eropa	12.487	80.226	European Euro
Dolar Singapura	261.049	72.684	Singapore Dollar
New Taiwan Dollar	35.053	38.132	New Taiwan Dollar
Dolar Hongkong	25.336	22.853	Hongkong Dollar
Won Korea	17.131	17.081	Korean Won
Poundsterling Inggris	7.508	8.270	Great Britain Poundsterling
Yen Jepang	5.817	6.934	Japanese Yen
Baht Thailand	3.085	3.370	Thailand Baht
Dolar Selandia Baru	25.596	2.320	New Zealand Dollar
Yuan Cina	2.927	2.277	Chinese Yuan
Real Saudi	1.879	1.855	Saudi Riyal
Kas	<u>98.250</u>	<u>114.000</u>	Cash on hand
	<u><b>53.929.444</b></u>	<u><b>61.723.223</b></u>	

**5. GIRO PADA BANK INDONESIA**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Rupiah	634.976.430	599.556.834	Rupiah
Dolar Amerika Serikat	<u>28.137.286</u>	<u>13.066.500</u>	United States Dollar
	<u><b>663.113.716</b></u>	<u><b>612.623.334</b></u>	

Pada tanggal 31 Desember 2021 dan 2020, saldo giro pada Bank Indonesia termasuk giro yang berdasarkan pada prinsip perbankan Syariah (Entitas Anak) masing-masing adalah sebesar Rp47.399.071 dan Rp42.115.859.

As of December 31, 2021 and 2020, current accounts with Bank Indonesia include amounts under Sharia banking principles (Subsidiary) of Rp47,399,071 and Rp42,115,859, respectively.

Rasio GWM Grup pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

As of December 31, 2021 and 2020, the GWM ratios of the Group are as follows:

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Bank Umum - Konvensional			Commercial Bank - Conventional
Rupiah			Rupiah
Giro Wajib Minimum *)	3,57%	3,06%	Minimum Statutory Reserve *)
Penyangga Likuiditas Makroprudensial **)	14,97%	12,57%	Macroprudential Liquidity Buffer **)
GWM Rasio Intermediasi Makroprudensial ***)	0,23%	0,88%	GWM Macroprudential Intermediation Ratio ***)
Valuta Asing	4,05%	4,05%	Foreign Currencies
Bank Syariah			Sharia Bank
Rupiah			Rupiah
Giro Wajib Minimum*)	3,54%	3,07%	Minimum Statutory Reserve*)

\*) Sebelumnya Giro Wajib Minimum Primer  
\*\*) Sebelumnya Giro Wajib Minimum Sekunder  
\*\*\*) Sebelumnya Giro Wajib Minimum LFR

\*) Previously Primary Minimum Statutory Reserve  
\*\*) Previously Secondary Minimum Statutory Reserve  
\*\*\*) Previously Loan to Funding Ratio Minimum Statutory Reserve



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**5. GIRO PADA BANK INDONESIA (lanjutan)**

Saldo giro pada Bank Indonesia adalah untuk memenuhi persyaratan Giro Wajib Minimum (GWM) dari Bank Indonesia.

Disamping itu, berdasarkan PBI No. 20/4/PBI/2018 tanggal 29 Maret 2018 sebagaimana telah beberapa kali diubah, terakhir dengan PBI No.22/17/PBI/2020 tanggal 30 September 2020 tentang Perubahan Kedua atas Peraturan Bank Indonesia No. 20/4/PBI/2018 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah; dan PADG No. 21/22/PADG/2019 tanggal 28 November 2019 sebagaimana telah mengalami beberapa kali perubahan, terakhir dengan PADG No. 22/30/PADG/2020 tanggal 5 Oktober 2020 tentang Perubahan Kedua atas Peraturan Anggota Dewan Gubernur No. 21/22/PADG/2019 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah, Bank wajib memenuhi Rasio Intermediasi Makroprudensial (RIM) dan Penyangga Likuiditas Makroprudensial (PLM) dari rata-rata DPK dalam Rupiah selama periode laporan tertentu. Pada tanggal 31 Desember 2021 dan 2020, ketentuan parameter disinsentif batas bawah dan batas atas yang digunakan dalam pemenuhan Giro RIM masing-masing adalah 0,5% dan nihil, sedangkan rasio PLM minimal ditetapkan sebesar 6%.

Bank telah memenuhi peraturan Bank Indonesia yang berlaku tentang Giro Wajib Minimum bank umum konvensional dan Entitas Anak pada tanggal 31 Desember 2021 dan 2020.

**6. GIRO PADA BANK LAIN**

**a. Berdasarkan bank**

	31 Desember/December 31,	
	2021	2020
<b>Rupiah</b>		
PT Bank Central Asia Tbk	36.333.506	41.284.020
PT Bank Mandiri (Persero) Tbk	10.103.156	4.561
PT Bank Negara Indonesia (Persero) Tbk	8.774.241	10.524.840
PT Bank Maybank Indonesia Tbk	2.003.970	1.571.768
PT Bank HSBC Indonesia	1.211.211	-
PT Bank Syariah Indonesia Tbk (d/h PT Bank Syariah Mandiri)	672.110	974.302
PT Bank Mega Tbk	678.642	-
PT Bank DBS Indonesia	592.775	-
PT Bank CIMB Niaga Tbk	430.926	-

**5. CURRENT ACCOUNTS WITH BANK INDONESIA (continued)**

Current accounts with Bank Indonesia are provided to fulfill Bank Indonesia's requirements on Minimum Reserve Requirements (GWM).

Furthermore, based on PBI No. 20/4/PBI/2018 dated March 29, 2018 as amended several times, most recently with PBI No. 22/17/PBI/2020 dated September 30, 2020 concerning the Second Amendment to Bank Indonesia Regulation No. 20/4/PBI/2018 concerning Ratio Macroprudential Intermediation and Macroprudential Liquidity Support for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units; and PADG No. 21/22/PADG/2019 dated November 28, 2019 as amended several times, most recently with PADG No. 22/30/PADG/2020 dated 5 October 2020 concerning the Second Amendment to the Regulation of Members of the Board of Governors No. 21/22/PADG/2019 concerning Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units, Banks must meet the Macroprudential Intermediation Ratio (RIM) and Macroprudential Liquidity Buffer (PLM) of the average TPF in Rupiah during specific reporting periods. As of December 31, 2021 and 2020, the provisions for the lower and upper limit disincentive parameters used in fulfilling RIM are 0.5% and nihil, respectively, while the minimum of PLM ratio is set at 6%.

The Bank has fulfilled the prevailing Bank Indonesia's regulation regarding Minimum Reserve Requirements for conventional banks and Subsidiary as of December 31, 2021 and 2020.

**6. CURRENT ACCOUNTS WITH OTHER BANKS**

**a. By bank**

	<b>Rupiah</b>
PT Bank Central Asia Tbk	
PT Bank Mandiri (Persero) Tbk	
PT Bank Negara Indonesia (Persero) Tbk	
PT Bank Maybank Indonesia Tbk	
PT Bank HSBC Indonesia	
PT Bank Syariah Indonesia Tbk (d/h PT Bank Syariah Mandiri)	
PT Bank Mega Tbk	
PT Bank DBS Indonesia	
PT Bank CIMB Niaga Tbk	

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**6. GIRO PADA BANK LAIN (lanjutan)**

**a. Berdasarkan bank (lanjutan)**

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
<b>Rupiah (lanjutan)</b>		
PT Bank Permata Tbk	155.741	-
PT Bank Pan Indonesia Tbk	4.431	16.943
	<u>60.960.709</u>	<u>54.376.434</u>
<b>Mata Uang Asing</b>		
PT Bank Negara Indonesia (Persero) Tbk	211.368.447	109.689.499
PT Bank Mandiri (Persero) Tbk	80.910.277	19.283.900
PT Bank CIMB Niaga Tbk	1.034.542	925.156
OCBC Bank, Singapura	240.112	378.504
PT Bank Central Asia Tbk	51.152.911	267.419
	<u>344.706.289</u>	<u>130.544.478</u>
<b>Jumlah</b>	<b><u>405.666.998</u></b>	<b><u>184.920.912</u></b>

Pada tanggal 31 Desember 2021 dan 2020, saldo giro pada bank lain (pihak ketiga) termasuk giro yang berdasarkan pada prinsip perbankan Syariah (Entitas Anak) masing-masing adalah sebesar Rp3.795.261 dan Rp3.049.976.

Pada tanggal 31 Desember 2021 dan 2020, tidak terdapat giro pada bank lain yang dijaminkan.

**b. Berdasarkan mata uang**

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
Rupiah	60.960.709	54.376.434
Dolar Amerika Serikat	340.947.585	128.926.561
Yen Jepang	2.402.274	221.654
Euro Eropa	1.034.542	925.156
Dolar Singapura	240.112	378.504
China Yuan	81.776	92.603
	<u>405.666.998</u>	<u>184.920.912</u>
<b>Jumlah</b>	<b><u>405.666.998</u></b>	<b><u>184.920.912</u></b>

**c. Berdasarkan kolektibilitas sesuai Peraturan Bank Indonesia**

Pada tanggal 31 Desember 2021 dan 2020, semua giro pada bank lain diklasifikasikan lancar.

**6. CURRENT ACCOUNTS WITH OTHER BANKS  
(continued)**

**a. By bank (continued)**

**Rupiah (continued)**  
PT Bank Permata Tbk  
PT Bank Pan Indonesia Tbk

**Foreign Currency**  
PT Bank Negara Indonesia  
(Persero) Tbk  
PT Bank Mandiri (Persero) Tbk  
PT Bank CIMB Niaga Tbk  
OCBC Bank, Singapore  
PT Bank Central Asia Tbk

**Total**

As of December 31, 2021 and 2020, current accounts with other banks (third parties) include amount under Sharia banking principles (Subsidiary) of Rp3,795,261 and Rp3,049,976, respectively.

As of December 31, 2021 and 2020, there are no current accounts with other banks pledged as collateral.

**b. By currency**

**Rupiah**  
United States Dollar  
Japanese Yen  
European Euro  
Singapore Dollar  
Chinese Yuan

**Total**

**c. By collectibility according to Bank Indonesia Regulation**

All current accounts with other banks are classified as current as of December 31, 2021 and 2020.



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**7. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN (lanjutan)**

**a. Berdasarkan jenis, pihak dan bank (lanjutan)**

Pada tanggal 31 Desember 2021 dan 2020, saldo penempatan pada Bank Indonesia dan bank lain termasuk penempatan yang berdasarkan prinsip perbankan Syariah (Entitas Anak) masing-masing adalah sebesar Rp185.000.000 dan Rp248.000.000.

Pada tanggal 31 Desember 2021 dan 2020, tidak terdapat penempatan Bank Indonesia dan pada bank lain yang dijaminkan.

**b. Berdasarkan tenor jatuh tempo**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Kurang dari 1 bulan	763.852.298	1.430.170.815	<i>Less than 1 month</i>
1 sampai 3 bulan	-	215.000.000	<i>1 up to 3 months</i>
3 sampai 6 bulan	-	-	<i>3 up to 6 months</i>
Lebih dari 6 bulan	-	47.053.918	<i>More than 6 months</i>
<b>Jumlah</b>	<b><u>763.852.298</u></b>	<b><u>1.692.224.733</u></b>	<b>Total</b>
Dikurangi: Cadangan Kerugian Penurunan Nilai	(1.485.966)	-	<i>Less: Allowance for impairment losses</i>
	<b><u>762.366.332</u></b>	<b><u>1.692.224.733</u></b>	

**c. Berdasarkan mata uang**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Rupiah	607.074.798	1.607.924.733	<i>Rupiah</i>
Dolar Amerika Serikat	156.777.500	84.300.000	<i>United States Dollar</i>
<b>Jumlah</b>	<b><u>763.852.298</u></b>	<b><u>1.692.224.733</u></b>	<b>Total</b>
Dikurangi: Cadangan Kerugian Penurunan Nilai	(1.485.966)	-	<i>Less: Allowance for impairment losses</i>
	<b><u>762.366.332</u></b>	<b><u>1.692.224.733</u></b>	

**d. Berdasarkan kolektibilitas sesuai Peraturan Bank Indonesia**

Pada tanggal 31 Desember 2021 dan 2020, seluruh penempatan pada Bank Indonesia dan bank lain digolongkan sebagai lancar.

**7. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS (continued)**

**a. By type, counterparties and bank (continued)**

As of December 31, 2021 and 2020, placements with Bank Indonesia and other banks include amounts under Sharia banking principles (Subsidiary) of Rp185,000,000 and Rp248,000,000, respectively.

As of December 31, 2021 and 2020, there are no placements Bank Indonesia and with other banks pledged as collateral.

**b. By period maturity**

**c. By currency**

**d. By collectability according to Bank Indonesia Regulation**

As of December 31, 2021 and 2020, all placements with Bank Indonesia and other banks are classified as current.

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**7. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN (lanjutan)**

**e. Cadangan kerugian penurunan nilai**

Seluruh penempatan pada Bank Indonesia dan bank lain berada di *stage 1* pada tanggal 31 Desember 2021 dan 2020. Pada tanggal 31 Desember 2021 Grup telah membentuk cadangan kerugian penurunan nilai sebesar Rp1.485.966 dan pada tanggal 31 Desember 2020 tidak terdapat cadangan kerugian penurunan nilai untuk penempatan pada Bank Indonesia dan bank lain.

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

**8. EFEK-EFEK**

**a. Berdasarkan jenis**

	<u>31 Desember/December 31,</u>	
	<u>2021</u>	<u>2020</u>
<b>Nilai wajar melalui laba rugi</b>		
<b>Rupiah</b>		
Reksadana	1.001.330.496	1.736.477.992
Obligasi Pemerintah	34.521.141	-
Subtotal	<u>1.035.851.637</u>	<u>1.736.477.992</u>
<b>Nilai wajar melalui penghasilan komprehensif lain</b>		
<b>Rupiah</b>		
Surat Utang Negara	2.273.323.444	2.164.751.191
Surat Berharga Syariah Negara	349.056.734	465.678.692
Obligasi korporasi	347.312.000	412.011.558
Reksadana	25.184.371	63.673.081
Wesel jangka menengah	30.658.100	58.000.000
Surat Berharga Syariah korporasi	<u>20.736.000</u>	<u>17.209.800</u>
Subtotal	<u>3.046.270.649</u>	<u>3.181.324.322</u>
<b>Biaya perolehan diamortisasi</b>		
<b>Rupiah</b>		
Surat Utang Negara	778.224.624	350.175.824
Obligasi korporasi	151.818.953	71.580.302
Surat Berharga Syariah Negara	139.429.632	214.775.725
Reksadana	20.000.000	862.000.000
Wesel Jangka Menengah	<u>15.000.000</u>	<u>-</u>
Subtotal	<u>1.104.473.209</u>	<u>1.498.531.851</u>
Jumlah	<u>5.186.595.495</u>	<u>6.416.334.165</u>
Dikurangi:		
Cadangan kerugian penurunan nilai	<u>(11.108.843)</u>	<u>(9.663.323)</u>
<b>Jumlah - bersih</b>	<u><u>5.175.486.652</u></u>	<u><u>6.406.670.842</u></u>

Pada tanggal 31 Desember 2021 dan 2020, tidak terdapat efek-efek yang dijaminkan.

**7. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS (continued)**

**e. Allowance for impairment losses**

All placements in Bank Indonesia and other banks are classified in *stage 1* as of December 31, 2021 and 2020. as of December 31, 2021, the Group has set aside allowance for impairment losses amounted to Rp1,485,966 and as of December 31, 2020, there is no allowance for impairment losses of placement with Bank Indonesia and other banks.

Management believes that the above allowance for impairment losses is adequate.

**8. MARKETABLE SECURITIES**

**a. By type**

	<i>Fair value through profit or loss</i>
	<b>Rupiah</b>
	<i>Mutual funds</i>
	<i>Government bonds</i>
	<i>Subtotal</i>
	<b>Fair value through other comprehensive income</b>
	<b>Rupiah</b>
	<i>Government Promissory Notes</i>
	<i>Government Sharia Bonds</i>
	<i>Corporate bonds</i>
	<i>Mutual funds</i>
	<i>Medium-term notes</i>
	<i>Corporate Sharia Bonds</i>
	<i>Subtotal</i>
	<b>Amortised cost</b>
	<b>Rupiah</b>
	<i>Government Promissory Notes</i>
	<i>Corporate bonds</i>
	<i>Government Sharia Bonds</i>
	<i>Mutual funds</i>
	<i>Medium-term notes</i>
	<i>Subtotal</i>
	<b>Total</b>
	<i>Less:</i>
	<i>Allowance for impairment losses</i>
	<b>Total - net</b>

As of December 31, 2021 and 2020, there are no marketable securities pledged as collateral.

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**8. EFEK-EFEK (lanjutan)**

**8. MARKETABLE SECURITIES (continued)**

**b. Obligasi korporasi**

**b. Corporate bonds**

**i. Nilai wajar melalui penghasilan  
komprehensif lain**

**i. Fair value through other comprehensive  
income**

**31 Desember/ December 31, 2021**

	Obligasi/ Bonds	Jumlah/ Amount	Tingkat suku bunga/ Interest rate (%)	Tanggal jatuh tempo/ Maturity date	Peringkat/ Rating
Lembaga Pembiayaan Ekspor Indonesia	Eximbank Brk IV/IV 2019 B	30.459.239	8,40	23-Apr-22	idAAA
PT Aneka Gas Industri Tbk	Obligasi Berkelanjutan II/III 2021 C	2.001.448	8,10	22-Dec-24	A-(idn)
PT Astra Sedaya Finance	ASDF Berkelanjutan IV/III 2019 B	10.339.472	7,70	23-Oct-22	idAAA
PT Astra Sedaya Finance	ASDF Berkel IV/IV 2020 B	10.364.705	7,00	27-Mar-23	idAAA
PT Astra Sedaya Finance	ASDF Berkl IV/III 2019 C	10.692.066	7,95	23-Oct-24	idAAA
PT Bank CIMB Niaga Tbk	OBL BKLJT II Bank CIMB Tahap II 2017 C	20.570.000	8,15	23-Aug-22	idAAA
PT Bank Tabungan Negara (Persero)Tbk	BTN Berkl I Thp I 2012	7.123.215	7,90	05-Jun-22	idAA+
PT Bank Tabungan Negara (Persero)Tbk	BTN Berkl I/II Th 2013	19.774.876	7,90	27-Mar-23	idAA+
PT Danareksa Indonesia Power PLN 1 - Piutang	EBA DNRK Ind Power PLN1 A	5.397.680	8,02	19-Sep-22	idAAA(sf)
EBA-SP SMF-BTN 05	EBA-SP SMF-BTN05 KELAS A SERI A1	28.588.100	8,50	7-May-32	idAAA(sf)
PT Federal International Finance	FIF berk III / V 2019 B	18.194.071	8,80	12-Mar-22	idAAA
PT Japfa Comfeed Indonesia Tbk	JAPFA Tahap II 2017	10.102.946	9,60	21-Apr-22	A+(idn)
PT Mandiri Tunas Finance	OBL BKLJT IV/II 2019 A	20.590.086	8,90	26-Jul-22	idAA+
PT Maybank Indonesia Finance	Maybank Fin II/II 2019 A	20.275.901	9,00	02-Apr-22	AA+(idn)
PT Mayora Indah Tbk	Mayora Indah Brk I/I 2017	20.157.747	9,25	24-Feb-22	idAA
PT Mayora Indah Tbk	Mayora Indah I/III 2018	15.606.583	8,15	24-Apr-23	idAA
PT Permodalan Nasional Madani (Persero)	PNM Berkelanjutan III/II 2019 A	27.720.284	8,40	28-Nov-22	idAA
PT Sarana Multigriya Finansial (Persero)	SMF Berkelanjutan IV/ VIII 2019 B	10.114.322	8,45	22-Mar-22	idAAA
PT Sarana Multigriya Finansial (Persero)	SMF Berkelanjutan V thp I 2019 B	25.611.164	8,50	04-Jul-22	idAAA
PT Sarana Multigriya Finansial (Persero)	EBA-SP SMF-BTN03 KELAS A SERI A2	8.085.188	8,40	7-Jul-29	idAAA(sf)
PT Serasi Autoraya	OBL Berkelanjutan I Serasi Autoraya THP I 2019 C	5.182.539	8,35	27-Apr-23	AA-(idn)
PT Surya Artha Nusantara Finance	Surya Artha Nusantara Finance Berkelanjutan III/I 2019 B	<u>20.360.368</u>	8,5	28-May-22	idAA
<b>Jumlah/Total</b>		<b><u>347.312.000</u></b>			

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**8. EFEK-EFEK (lanjutan)**

**8. MARKETABLE SECURITIES (continued)**

**b. Obligasi korporasi (lanjutan)**

**b. Corporate bonds (continued)**

**i. Nilai wajar melalui penghasilan  
komprehensif lain (lanjutan)**

**i. Fair value through other comprehensive  
income (continued)**

31 Desember/ December 31, 2020

Pihak penerbit/ <i>Issuers</i>	Obligasi/ <i>Bonds</i>	Jumlah/ <i>Amount</i>	Tingkat suku bunga/ <i>Interest rate</i> (%)	Tanggal jatuh tempo/ <i>Maturity date</i>	Peringkat/ <i>Rating</i>
Lembaga Pembiayaan Ekspor Indonesia	Eximbank Brk IV/IV 2019 B	30.985.516	8,40	23-Apr-22	idAAA
PT Aneka Tambang Tbk	Obligasi Antam 2011 B	19.368.494	9,05	14-Dec-21	idAA
PT Astra Sedaya Finance	ASDF Berkelanjutan IV/III 2019 B	937.249	7,70	23-Oct-22	idAAA
PT Astra Sedaya Finance	ASDF Berkel IV/IV 2020 B	25.938.030	7,00	27-Mar-23	idAAA
PT Astra Sedaya Finance	ASDF Berkl IV/III 2019 C	3.029.959	7,95	23-Oct-24	idAAA
PT Bank Tabungan Negara (Persero)Tbk	BTN Berkl I Thp I 2012	43.735.865	7,90	05-Jun-22	idAA+
PT Bank Tabungan Negara (Persero)Tbk	Bank CIMB II/II 2017 C	10.283.329	8,15	23-Aug-22	idAAA
PT Bank Tabungan Negara (Persero)Tbk	BTN Berkl I/II Th 2013	10.200.779	7,90	27-Mar-23	idAA+
PT Danareksa Indonesia Power PLN 1 - Piutang	EBA DNRK Ind Power PLN1	36.228.273	8,02	19-Sep-22	idAAA
PT Federal International Finance	FIF berk III / V 2019 B	18.678.382	8,80	12-Mar-22	idAAA
PT Jamfa Comfeed Indonesia	JAPFA Tahap II 2017	20.780.317	9,60	21-Apr-22	A+ (idn)
PT Mandiri Tunas Finance	TUFI Berk IV/II 2019 A	27.204.990	8,90	26-Jul-22	idAA+
PT Maybank Indonesia Finance	Maybank Fin II/II 2019 A	20.655.745	9,00	02-Apr-22	idAA+
PT Mayora Indah Tbk	Mayora Indah Brk I/I 2017	12.107.258	9,25	24-Feb-22	idAA
PT Mayora Indah Tbk	Mayora Indah I/III 2018	5.133.157	8,15	24-Apr-23	idAA
PT Permodalan Nasional Madani (Persero)	PNM Berkel III/II 2019 A	10.306.494	8,40	28-Nov-22	idA+
PT Sarana Multigriya Finansial (Persero)	EBA SP SMF BTN 03 KLS A2	10,292,055	8,40	07-Jul-29	idAAA
PT Sarana Multigriya Finansial (Persero)	EBA-SP SMF-BTN05 KLS A1	7.134.989	8,50	07-May-32	idAAA
PT Sarana Multigriya Finansial (Persero)	EBA-SP SMF-BTN05 KLS A2	20.683.074	8,75	07-May-32	idAAA
PT Sarana Multigriya Finansial (Persero)	SMF Berk IV/ VIII 2019 B	10.293.734	8,45	22-Mar-22	idAAA
PT Sarana Multigriya Finansial (Persero)	SMF Berk V thp I 2019 B	15.528.535	8,50	04-Jul-22	idAAA
PT Serasi Autoraya	Sera Brkl I/I 2018 C	20.612.036	8,35	27-Apr-23	idAA-
PT Surya Artha Nusantara Finance	SAN Fin berk III/I 2019 B	20.653.020	8,75	28-May-22	AA (idn)
PT Timah Tbk	Timah Berk I/ II 2019 A	11.240.278	8,50	15-Aug-22	idA+
<b>Jumlah/Total</b>		<b>412.011.558</b>			



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**8. EFEK-EFEK (lanjutan)**

**8. MARKETABLE SECURITIES (continued)**

**b. Obligasi korporasi (lanjutan)**

**b. Corporate bonds (continued)**

**ii. Biaya perolehan diamortisasi**

**ii. Amortised cost**

**31 Desember/ December 31, 2021**

Pihak penerbit/ <i>Issuers</i>	Obligasi/ <i>Bonds</i>	Jumlah/ <i>Amount</i>	Tingkat suku bunga/ Interest rate (%)	Tanggal jatuh tempo/ Maturity date	Peringkat/ <i>Rating</i>
Lembaga pembiayaan Ekspor Indonesia (Indonesia Eximbank)	Obligasi Berkelanjutan Indonesia Eximbank IV/IV 2019 B	98.460.705	8,40	23-Apr-22	idAAA
PT Bank Mandiri Taspen	Bank Mantap Brk I/I 2019A	22.147.798	7,90	26-Nov-22	AA(idn)
PT Mayora Indah Tbk.	Mayora Indah I/II 2017	11.064.845	8,25	21-Dec-22	idAA
PT Mandiri Tunas Finance	TUFI Berk IV/II 2019 A	10.080.140	8,90	26-Jul-22	idAA+
PT Bank Tabungan Negara (Persero) Tbk	BTN Berk III/II 2019 B	10.065.465	8,75	28-Jun-22	idAA+
<b>Jumlah/Total</b>		<b>151.818.953</b>			

**31 Desember/ December 31, 2020**

Pihak penerbit/ <i>Issuers</i>	Obligasi/ <i>Bonds</i>	Jumlah/ <i>Amount</i>	Tingkat suku bunga/ Interest rate (%)	Tanggal jatuh tempo/ Maturity date	Peringkat/ <i>Rating</i>
PT Bank Tabungan Negara (Persero) Tbk	BTN Berk III/II 2019 B	10.192.917	8,75	28-Jun-22	idAA+
PT Bank Mandiri Taspen	Bank Mantap Brk I/I 2019A	22.301.473	7,90	26-Nov-22	idAA
PT Aneka Tambang Tbk	OBLIGASI ANTAM 2011 B	3.036.201	9,05	14-Dec-21	idAA
PT Mandiri Tunas Finance	TUFI Berk IV/II 2019 A	10.214.506	8,90	26-Jul-22	idAA+
PT Mayora Indah Tbk.	Mayora Indah I/II 2017	11.127.053	8,25	21-Dec-22	idAA
PT Tiga Pilar Sejahtera Food Tbk	TPS Food I Th 2013	14.708.152	10,25	05-Apr-21	N/A
<b>Jumlah/Total</b>		<b>71.580.302</b>			

**c. Berdasarkan sisa umur jatuh tempo**

**c. By remaining period to maturity**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
<u>Diukur pada biaya perolehan diamortisasi</u>			<u>Measured at amortised cost</u>
Kurang dari 1 tahun	161.817.142	97.062.585	Less than 1 year
1 sampai dengan 2 tahun	-	63.792.833	1 up to 2 years
2 sampai dengan 5 tahun	60.074.006	-	2 up to 5 years
Lebih dari 5 tahun	862.582.061	475.676.433	More than 5 years
Tidak ada jatuh tempo	20.000.000	862.000.000	No maturity date
	<b>1.104.473.209</b>	<b>1.498.531.851</b>	

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**8. EFEK-EFEK (lanjutan)**

**d. Informasi lainnya**

Pada tanggal 31 Desember 2021 dan 2020, Bank menjadi investor mayoritas dalam beberapa investasi unit reksadana masing-masing sebesar Rp25.184.371 (2020: Rp688.000.000) yang diukur dengan nilai wajar melalui laba rugi dan Rp125.258.484 (2020: Rp202.653.951) yang diukur dengan nilai wajar melalui penghasilan komprehensif lain.

**e. Berdasarkan kolektibilitas sesuai Peraturan Bank Indonesia**

	31 Desember/December 31,				
	2021		2020		
	Nilai tercatat/ Carrying Value	Cadangan/ Allowance	Nilai tercatat/ Carrying Value	Cadangan/ Allowance	
Lancar	5.186.595.495	(11.108.843)	6.401.626.013	-	Current
Kurang lancar	-	-	-	-	Substandard
Macet	-	-	14.708.152	(9.663.323)	Loss
<b>Jumlah</b>	<b>5.186.595.495</b>	<b>(11.108.843)</b>	<b>6.416.334.165</b>	<b>(9.663.323)</b>	<b>Total</b>

**f. Perubahan cadangan kerugian penurunan nilai**

Perubahan cadangan kerugian penurunan nilai efek-efek untuk tahun yang berakhir 31 Desember 2021 dan 2020 adalah sebagai berikut:

**8. MARKETABLE SECURITIES (continued)**

**d. Other information**

As of December 31, 2021 and 2020, the Bank has become the major investor in some mutual funds amounting Rp25,184,371 (2020: Rp688,000,000) measured at fair value through by profit or loss and Rp125,258,484 (2020: Rp202,653,951) measured at fair value through other comprehensive income.

**e. By collectability as per Bank Indonesia**

**f. The changes in allowance for impairment losses**

The changes in impairment losses on marketable securities for the year ended December 31, 2021 and 2020 are as follows:

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**8. EFEK-EFEK (lanjutan)**

**f. Perubahan cadangan kerugian penurunan nilai (lanjutan)**

	31 Desember/December 31, 2021					
	Stage 1	Stage 2	Stage 3	Syariah/ Sharia	Jumlah/ Total	
Saldo awal tahun	-	-	9.663.323	-	9.663.323	Balance beginning of year
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (Stage 2)	-	-	-	-	-	Transfer to lifetime expected credit losses (Stage 2)
Transfer ke kredit yang mengalami penurunan nilai (Stage 3)	-	-	-	-	-	Transfer to credit impaired (Stage 3)
Transfer ke kerugian kredit ekspektasian 12 bulan (Stage 1)	-	-	-	-	-	Transfer to 12 month expected credit losses (Stage 1)
Perubahan bersih pada eksposur	11.108.843	-	5.605.404	-	16.714.247	Net change in exposure
Penghapusbukuan	-	-	(15.268.727)	-	(15.268.727)	Write off
<b>Saldo akhir tahun</b>	<b>11.108.843</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>11.108.843</b>	<b>Balance end of year</b>

	31 Desember/December 31, 2020					
	Stage 1	Stage 2	Stage 3	Syariah/ Sharia	Jumlah/ Total	
Saldo awal tahun	-	-	9.240.001	2.000.000	11.240.001	Balance beginning of year
Dampak penerapan awal PSAK 71	-	-	-	-	-	Effect on initial implementation SFAS 71
Saldo awal PSAK 71	-	-	9.240.001	2.000.000	11.240.001	Balance beginning SFAS 71
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (Stage 2)	-	-	-	-	-	Transfer to lifetime expected credit losses (Stage 2)
Transfer ke kredit yang mengalami penurunan nilai (Stage 3)	-	-	-	-	-	Transfer to credit impaired (Stage 3)
Transfer ke kerugian kredit ekspektasian 12 bulan (Stage 1)	-	-	-	-	-	Transfer to 12 month expected credit losses (Stage 1)
Perubahan bersih pada eksposur	-	-	423.322	(516.912)	(93.590)	Net change in exposure
Penghapusbukuan	-	-	-	(1.483.088)	(1.483.088)	Write off
<b>Saldo akhir tahun</b>	<b>-</b>	<b>-</b>	<b>9.663.323</b>	<b>-</b>	<b>9.663.323</b>	<b>Balance end of year</b>

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

Management believes that the above allowance for impairment losses is adequate.

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**9. EFEK-EFEK YANG DIBELI DENGAN JANJI  
DIJUAL KEMBALI**

Efek-efek yang dibeli dengan janji dijual kembali pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

**9. SECURITIES PURCHASED UNDER RESALE  
AGREEMENTS**

The securities purchased under resale agreements as of December 31, 2021 and 2020 were as follows:

31 Desember/ December 31, 2021						
Pihak lawan/ Counterparty	Jenis efek/ Type of Securities	Nilai wajar/ Fair value amount	Tingkat suku bunga/ Interest rate	Tanggal dimulai/ Commencement date	Tanggal jatuh tempo/ Maturity date	Nilai tercatat/ Carrying amount
Bank Indonesia	FR0056	50.204.916	3,50%	27 September/ September 2021	3 Januari/ January 2022	49.052.168
Bank Indonesia	VR0043	44.350.433	3,50%	27 September/ September 2021	3 Januari/ January 2022	42.213.961
Bank Indonesia	VR0043	44.350.433	3,50%	27 September/ September 2021	3 Januari/ January 2022	42.213.961
Bank Indonesia	VR0043	44.350.433	3,50%	27 September/ September 2021	3 Januari/ January 2022	42.213.961
Bank Indonesia	VR0043	44.350.433	3,50%	27 September/ September 2021	3 Januari/ January 2022	42.213.961
Bank Indonesia	VR0046	41.398.178	3,50%	30 September/ September 2021	6 Januari/ January 2022	39.598.404
Bank Indonesia	VR0046	41.398.178	3,50%	30 September/ September 2021	6 Januari/ January 2022	39.598.404
Bank Indonesia	FR0077	68.065.366	3,50%	31 September/ September 2021	7 Januari/ January 2022	65.595.714
Bank Indonesia	FR0077	68.065.366	3,50%	31 September/ September 2021	7 Januari/ January 2022	65.595.714
Bank Indonesia	VR0050	62.507.492	3,50%	31 September/ September 2021	7 Januari/ January 2022	59.722.803
Bank Indonesia	VR0050	62.507.492	3,50%	31 September/ September 2021	7 Januari/ January 2022	59.722.803
Bank Indonesia	VR0054	62.473.166	3,50%	31 September/ September 2021	7 Januari/ January 2022	59.579.432
Bank Indonesia	VR0054	62.473.166	3,50%	31 September/ September 2021	7 Januari/ January 2022	59.579.432
Bank Indonesia	VR0058	<u>24.985.464</u>	3,50%	31 September/ September 2021	7 Januari/ January 2022	<u>23.813.852</u>
		<u><b>721.480.516</b></u>				<u><b>690.714.570</b></u>

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**9. EFEK-EFEK YANG DIBELI DENGAN JANJI  
DIJUAL KEMBALI (lanjutan)**

**9. SECURITIES PURCHASED UNDER RESALE  
AGREEMENTS (continued)**

31 Desember/ December 31, 2020						
Pihak lawan/ Counterparty	Jenis efek/ Type of Securities	Nilai wajar/ Fair value amount	Tingkat suku bunga/ Interest rate	Tanggal dimulai/ Commencement date	Tanggal jatuh tempo/ Maturity date	Nilai tercatat/ Carrying amount
Bank Indonesia	FR0056	<u>458.800.000</u>	3.75%	29 Desember/ December 2020	5 Januari/ January 2021	<u>447.804.800</u>
		<u>458.800.000</u>				<u>447.804.800</u>

Pada tanggal 31 Desember 2021 dan 2020, seluruh efek yang dibeli dengan janji dijual kembali digolongkan sebagai lancar dan berada di stage 1.

As of December 31, 2021 and 2020, all securities purchased under resale agreements were classified as current and are in stage 1.

Manajemen berpendapat tidak diperlukan cadangan kerugian penurunan nilai pada tanggal 31 Desember 2021 dan 2020.

Management believes that no allowance for impairment losses is required as of December 31, 2021 and 2020.

**10. PENDAPATAN BUNGA DAN SYARIAH YANG  
MASIH AKAN DITERIMA**

**10. INTEREST AND SHARIA INCOME RECEIVABLES**

	31 Desember/December 31,		
	2021	2020	
Pinjaman yang diberikan, pembiayaan dan piutang syariah	308.334.215	196.396.802	Loans, sharia financing and receivables
Efek-efek	56.153.303	50.608.913	Marketable securities
Surat-surat berharga yang dibeli dengan janji dijual kembali	159.595	139.939	Securities purchased under resale agreements
Penempatan pada Bank Indonesia dan bank lain	<u>46.434</u>	<u>1.094.799</u>	Placements with Bank Indonesia and other banks
<b>Jumlah</b>	<b><u>364.693.547</u></b>	<b><u>248.240.453</u></b>	<b>Total</b>

**11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN  
DAN PIUTANG SYARIAH**

**11. LOANS, SHARIA FINANCING AND  
RECEIVABLES**

Semua pinjaman yang diberikan, pembiayaan dan piutang syariah kepada debitur menggunakan mata uang Rupiah.

All loans, sharia financing and receivables granted by the Bank to the debtors denominated in Rupiah.

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**11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN DAN PIUTANG SYARIAH (lanjutan)**      **11. LOANS, SHARIA FINANCING AND RECEIVABLES (continued)**

**a. Berdasarkan pihak dan jenis kredit**

**a. By counterparties and type**

	31 Desember/December 31,		
	2021	2020	
<b>Pihak Berelasi</b>			<b>Related Parties</b>
Pinjaman tetap	157.606.090	168.533.639	Fixed loans
Pinjaman rekening koran	29.821.088	34.860.289	Overdraft loans
Pinjaman tetap dengan angsuran	25.212.064	23.094.276	Fixed loans with installments
Pinjaman konsumen	2.210.989	5.538.702	Consumer loans
Pinjaman serba guna Syariah	3.568.365	4.390.586	Other loans
	633.681	999.004	Sharia
	<u>219.052.277</u>	<u>237.416.496</u>	
<b>Pihak Ketiga</b>			<b>Third Parties</b>
Pinjaman tetap	9.178.798.558	10.120.737.816	Fixed loans
Pinjaman tetap dengan angsuran	3.602.499.953	2.079.927.118	Fixed loans with installments
Pinjaman rekening koran	1.480.909.295	991.205.375	Overdraft loans
Syariah	805.335.621	1.165.972.592	Sharia
Pinjaman konsumen	159.630.595	189.112.262	Consumer loans
Pinjaman serba guna	42.848.112	58.982.639	Other loans
	<u>15.270.022.134</u>	<u>14.605.937.802</u>	
Dikurangi: Cadangan kerugian penurunan nilai	15.489.074.411	14.843.354.298	Less: Allowance for impairment of loan losses
	<u>(702.273.753)</u>	<u>(597.378.266)</u>	
<b>Jumlah</b>	<b><u>14.786.800.658</u></b>	<b><u>14.245.976.032</u></b>	<b>Total</b>

**b. Berdasarkan pihak dan sektor ekonomi**

**b. By counterparties and economic sector**

	31 Desember/December 31,		
	2021	2020	
<b>Pihak Berelasi</b>			<b>Related Parties</b>
Perdagangan, restoran dan hotel	22.234.308	30.729.765	Trading, restaurant, and hotel
Lembaga pembiayaan	29.017.261	28.708.269	Financing
Real estate	17.328.029	17.990.873	Real estate
Jasa-jasa sosial/masyarakat	2.821.400	3.000.000	Social community service
Syariah	633.681	999.004	Sharia
Industri	379.221	-	Industry
Lain-lain	146.638.377	155.988.585	Others
	<u>219.052.277</u>	<u>237.416.496</u>	
<b>Pihak Ketiga</b>			<b>Third Parties</b>
Real estate	2.555.154.647	3.210.437.992	Real estate
Perdagangan, restoran dan hotel	3.413.687.572	3.095.371.738	Trading, restaurant, and hotel
Lembaga pembiayaan	2.984.366.754	2.161.015.845	Financing
Industri	1.564.633.225	1.460.489.858	Industry
Syariah	805.335.621	1.165.972.592	Sharia
Konstruksi	1.104.130.385	707.891.463	Construction
Jasa-jasa sosial/masyarakat	503.427.456	659.697.981	Social community service
Lain-lain	2.339.286.474	2.145.060.333	Others
	<u>15.270.022.134</u>	<u>14.605.937.802</u>	
Dikurangi: Cadangan kerugian penurunan nilai	15.489.074.411	14.843.354.298	Less: Allowance for impairment losses
	<u>(702.273.753)</u>	<u>(597.378.266)</u>	
<b>Jumlah</b>	<b><u>14.786.800.658</u></b>	<b><u>14.245.976.032</u></b>	<b>Total</b>

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**11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN  
DAN PIUTANG SYARIAH (lanjutan)**

**b. Berdasarkan pihak dan sektor ekonomi  
(lanjutan)**

Pada tanggal 31 Desember 2021 dan 2020, rasio pinjaman kepada Usaha Mikro kecil terhadap pinjaman yang diberikan sesuai dengan Surat Edaran Bank Indonesia No.13/30/DPNP tanggal 16 Desember 2011 masing-masing sebesar 13,72% dan 10,91% (tidak diaudit).

**c. Berdasarkan jangka waktu periode  
perjanjian pinjaman**

	<u>31 Desember/December 31,</u>	
	<u>2021</u>	<u>2020</u>
Kurang dari 1 tahun	1.488.799.717	620.842.809
1 sampai dengan 2 tahun	6.200.913.219	6.372.719.547
2 sampai dengan 5 tahun	1.879.874.775	1.719.739.946
Lebih dari 5 tahun	<u>5.919.486.700</u>	<u>6.130.051.996</u>
	15.489.074.411	14.843.354.298
Dikurangi: Cadangan kerugian penurunan nilai	<u>(702.273.753)</u>	<u>(597.378.266)</u>
<b>Jumlah</b>	<b><u>14.786.800.658</u></b>	<b><u>14.245.976.032</u></b>

**d. Berdasarkan sisa umur jatuh tempo**

	<u>31 Desember/December 31,</u>	
	<u>2021</u>	<u>2020</u>
Kurang dari 1 tahun	8.255.950.507	7.752.268.006
1 sampai dengan 2 tahun	796.644.966	596.713.965
2 sampai dengan 5 tahun	3.798.129.944	3.143.962.051
Lebih dari 5 tahun	<u>2.638.348.994</u>	<u>3.350.410.276</u>
	15.489.074.411	14.843.354.298
Dikurangi: Cadangan kerugian penurunan nilai	<u>(702.273.753)</u>	<u>(597.378.266)</u>
<b>Jumlah</b>	<b><u>14.786.800.658</u></b>	<b><u>14.245.976.032</u></b>

**e. Berdasarkan kolektibilitas Bank Indonesia**

	<u>31 Desember/ December 31,</u>			
	<u>2021</u>		<u>2020</u>	
	<u>Pokok/ Principal</u>	<u>Cadangan/ Allowance</u>	<u>Pokok/ Principal</u>	<u>Cadangan/ Allowance</u>
Lancar	12.763.802.427	(101.345.707)	11.142.549.058	(58.404.282)
Dalam perhatian khusus	1.581.216.802	(85.896.752)	2.609.157.189	(152.874.793)
Kurang lancar	110.801.036	(41.863.392)	40.388.438	(15.494.845)
Diragukan	57.407.272	(16.157.058)	184.681.886	(68.195.592)
Macet	<u>975.846.874</u>	<u>(457.010.844)</u>	<u>866.577.727</u>	<u>(302.408.754)</u>
<b>Jumlah</b>	<b><u>15.489.074.411</u></b>	<b><u>(702.273.753)</u></b>	<b><u>14.843.354.298</u></b>	<b><u>(597.378.266)</u></b>

**11. LOANS, SHARIA FINANCING AND  
RECEIVABLES (continued)**

**b. By counterparties and economic sector  
(continued)**

As of December 31, 2021 and 2020, the ratio of micro business loans to the total loans in accordance with Bank Indonesia Circular Letter No.13/30/DPNP dated 16 Desember 2011 was 13.72% and 10.91%, respectively (unaudited).

**c. By period of the loan agreement**

	<u>31 Desember/December 31,</u>		
	<u>2021</u>	<u>2020</u>	
Kurang dari 1 tahun	1.488.799.717	620.842.809	<i>Less than 1 year</i>
1 up to 2 years	6.200.913.219	6.372.719.547	<i>1 up to 2 years</i>
2 up to 5 years	1.879.874.775	1.719.739.946	<i>2 up to 5 years</i>
More than 5 years	<u>5.919.486.700</u>	<u>6.130.051.996</u>	<i>More than 5 years</i>
	15.489.074.411	14.843.354.298	
Dikurangi: Allowance for impairment losses	<u>(702.273.753)</u>	<u>(597.378.266)</u>	<i>Less: Allowance for impairment losses</i>
<b>Total</b>	<b><u>14.786.800.658</u></b>	<b><u>14.245.976.032</u></b>	<b><i>Total</i></b>

**d. By remaining period to maturity**

	<u>31 Desember/December 31,</u>		
	<u>2021</u>	<u>2020</u>	
Kurang dari 1 tahun	8.255.950.507	7.752.268.006	<i>Less than 1 year</i>
1 up to 2 years	796.644.966	596.713.965	<i>1 up to 2 years</i>
2 up to 5 years	3.798.129.944	3.143.962.051	<i>2 up to 5 years</i>
More than 5 years	<u>2.638.348.994</u>	<u>3.350.410.276</u>	<i>More than 5 years</i>
	15.489.074.411	14.843.354.298	
Dikurangi: Allowance for impairment losses	<u>(702.273.753)</u>	<u>(597.378.266)</u>	<i>Less: Allowance for impairment losses</i>
<b>Total</b>	<b><u>14.786.800.658</u></b>	<b><u>14.245.976.032</u></b>	<b><i>Total</i></b>

**e. By Bank Indonesia collectibility**

	<u>31 Desember/ December 31,</u>				
	<u>2021</u>		<u>2020</u>		
	<u>Pokok/ Principal</u>	<u>Cadangan/ Allowance</u>	<u>Pokok/ Principal</u>	<u>Cadangan/ Allowance</u>	
Lancar	12.763.802.427	(101.345.707)	11.142.549.058	(58.404.282)	<i>Current</i>
Dalam perhatian khusus	1.581.216.802	(85.896.752)	2.609.157.189	(152.874.793)	<i>Special Mention</i>
Kurang lancar	110.801.036	(41.863.392)	40.388.438	(15.494.845)	<i>Substandard</i>
Diragukan	57.407.272	(16.157.058)	184.681.886	(68.195.592)	<i>Doubtful</i>
Macet	<u>975.846.874</u>	<u>(457.010.844)</u>	<u>866.577.727</u>	<u>(302.408.754)</u>	<i>Loss</i>
<b>Total</b>	<b><u>15.489.074.411</u></b>	<b><u>(702.273.753)</u></b>	<b><u>14.843.354.298</u></b>	<b><u>(597.378.266)</u></b>	<b><i>Total</i></b>



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**11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN  
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**11. LOANS, SHARIA FINANCING AND  
RECEIVABLES (continued)**

**f. Menurut Stage**

**f. By Stage**

Berikut adalah perubahan jumlah pinjaman yang diberikan berdasarkan stage selama tahun berakhir 31 Desember 2021 dan 2020:

Below is movement of loans based on stages during the year ended December 31, 2021 and 2020:

	31 Desember/ December 31, 2021					
	Stage 1	Stage 2	Stage 3	Syariah/ Sharia	Jumlah/ Total	
<b>Saldo awal tahun</b>	<b>10.189.607.854</b>	<b>2.450.340.075</b>	<b>1.036.434.773</b>	<b>1.166.971.596</b>	<b>14.843.354.298</b>	<b>Balance beginning of year</b>
Transfer ke kerugian kredit ekspektasian 12 bulan (Stage 1)	652.589.323	(651.694.219)	(895.104)	-	-	Transfer to expected credit losses (Stage 1)
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (Stage 2)	(940.738.614)	943.433.255	(2.694.641)	-	-	Transfer to lifetime expected credit losses (Stage 2)
Transfer ke kredit yang mengalami penurunan nilai (Stage 3)	(147.401.644)	(433.358.480)	580.760.124	-	-	Transfer to credit impaired (Stage 3)
Total saldo awal setelah pengalihan	<u>9.754.056.919</u>	<u>2.308.720.631</u>	<u>1.613.605.152</u>	<u>1.166.971.596</u>	<u>14.843.354.298</u>	Total opening balance after transfer
Pengukuran kembali bersih nilai tercatat	(406.423.856)	(22.642.839)	(96.129.895)	206.562.716	(318.633.874)	Net remeasurement of carrying amount
Aset keuangan yang baru diterbitkan atau dibeli	5.795.948.533	-	-	-	5.795.948.533	New financial asset originated or purchased
Aset keuangan yang dihentikan Pengakuannya	(2.968.992.869)	(844.705.202)	(24.568.247)	(560.643.185)	(4.398.909.503)	Derecognized financial assets
Aset keuangan yang Dihapusbuku	-	-	(425.763.218)	(6.921.825)	(432.685.043)	Written-off financial assets
Total penambahan/(pengurangan) tahun berjalan	<u>2.420.531.808</u>	<u>(867.348.041)</u>	<u>(546.461.360)</u>	<u>(361.002.294)</u>	<u>645.720.113</u>	Total additional/(reversal) during the year
<b>Saldo akhir tahun</b>	<b><u>12.174.588.727</u></b>	<b><u>1.441.372.590</u></b>	<b><u>1.067.143.792</u></b>	<b><u>805.969.302</u></b>	<b><u>15.489.074.411</u></b>	<b>Balance end of year</b>
	31 Desember/ December 31, 2020					
	Stage 1	Stage 2	Stage 3	Syariah/ Sharia	Jumlah/ Total	
<b>Saldo awal tahun</b>	<b>13.127.370.325</b>	<b>1.984.404.897</b>	<b>1.096.730.642</b>	<b>1.231.613.668</b>	<b>17.440.119.532</b>	<b>Balance beginning of year</b>
Transfer ke kerugian kredit ekspektasian 12 bulan (Stage 1)	311.789.572	(301.916.747)	(9.872.825)	-	-	Transfer to expected credit losses (Stage 1)
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (Stage 2)	(1.176.825.802)	1.182.525.802	(5.700.000)	-	-	Transfer to lifetime expected credit losses (Stage 2)
Transfer ke kredit yang mengalami penurunan nilai (Stage 3)	(197.737.471)	(756.838.241)	954.575.712	-	-	Transfer to credit impaired (Stage 3)
Total saldo awal setelah pengalihan	<u>12.064.596.624</u>	<u>2.108.175.711</u>	<u>2.035.733.529</u>	<u>1.231.613.668</u>	<u>17.440.119.532</u>	Total opening balance after transfer
Pengukuran kembali bersih nilai tercatat	(520.604.769)	12.951.636	(395.182.862)	(216.923.772)	(1.119.759.767)	Net remeasurement of carrying amount
Aset keuangan yang baru diterbitkan atau dibeli	2.350.803.164	623.304.352	55.134.241	347.895.000	3.377.136.757	New financial asset originated or purchased
Aset keuangan yang dihentikan Pengakuannya	(3.705.187.165)	(294.091.624)	(259.191.694)	(195.613.300)	(4.454.083.783)	Derecognized financial assets
Aset keuangan yang Dihapusbuku	-	-	(400.058.441)	-	(400.058.441)	Written-off financial assets
Total penambahan/(pengurangan) tahun berjalan	<u>(1.874.988.770)</u>	<u>342.164.364</u>	<u>(999.298.756)</u>	<u>(64.642.072)</u>	<u>(2.596.765.234)</u>	Total additional/(reversal) during the year
<b>Saldo akhir tahun</b>	<b><u>10.189.607.854</u></b>	<b><u>2.450.340.075</u></b>	<b><u>1.036.434.773</u></b>	<b><u>1.166.971.596</u></b>	<b><u>14.843.354.298</u></b>	<b>Balance end of year</b>

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**11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN  
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**11. LOANS, SHARIA FINANCING AND  
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**g. Pinjaman yang diberikan, pembiayaan dan piutang syariah yang mengalami penurunan nilai dan cadangan kerugian penurunan nilainya berdasarkan sektor ekonomi**

**g. Impaired loans, sharia financing and receivables and allowances for impairment losses by economic sector**

Pinjaman yang mengalami penurunan nilai berdasarkan sektor ekonomi dan cadangan yang dibentuk:

Impaired loan based on economic sector and allowance:

	31 Desember/December 31,		
	2021	2020	
Real estate	426.887.454	466.389.350	Real estate
Perdagangan, restoran dan hotel	474.380.441	304.442.155	Trading, restaurant and hotel
Industri	71.729.247	272.600.068	Industry
Konstruksi	160.816.578	135.758.897	Construction
Syariah	76.911.389	55.213.276	Sharia
Jasa-jasa sosial / masyarakat	47.313.279	46.861.950	Social / community services
Lain-lain	114.212.164	196.828.687	Others
	<u>1.372.250.552</u>	<u>1.478.094.383</u>	
Dikurangi:			Less:
Cadangan kerugian penurunan nilai	<u>(522.938.791)</u>	<u>(422.072.436)</u>	Allowance for impairment losses
<b>Jumlah</b>	<b><u>849.311.761</u></b>	<b><u>1.056.021.947</u></b>	<b>Total</b>

Pinjaman dikategorikan sebagai pinjaman yang bermasalah adalah termasuk pinjaman dalam kolektibilitas kurang lancar, diragukan, macet dan pinjaman yang direstrukturisasi dengan kolektibilitas dalam perhatian khusus. Termasuk dalam jumlah di atas adalah pembiayaan dan piutang syariah yang direstrukturisasi sejumlah Rp76.911.389 (2020: Rp55.213.276).

Impaired loans consists of loans in collectibility substandard, doubtful, loss and restructured loans with special mention collectibility. Including the above amounts are restructured sharia financing and receivables of Rp76,911,389 (2020: Rp55,213,276).

Rasio pinjaman bermasalah (*Non-Performing Loan - NPL*) kotor Entitas Induk terhadap total pinjaman yang diberikan pada tanggal 31 Desember 2021 dan 2020 masing-masing sebesar 7,27% dan 7,58%. Rasio NPL neto Entitas Induk terhadap total pinjaman yang diberikan pada tanggal 31 Desember 2021 dan 2020 masing-masing sebesar 4,08% dan 4,91%.

The ratio of non-performing loan (NPL)-gross of Parent Entity as of December 31, 2021 and 2020 was 7.27% and 7.58% to total loans, respectively. Ratio NPL-net to total loans of Parent Entity as of 31 December 2021 and 2020 was 4.08% and 4.91%, respectively.

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**11. LOANS, SHARIA FINANCING AND  
RECEIVABLES (continued)**

**h. Pinjaman yang direstrukturisasi**

**h. Restructured loans**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Perpanjangan jangka waktu, penurunan suku bunga pinjaman, penggabungan fasilitas penambahan plafon	3.044.858.987	3.613.514.591	<i>Extension of credit period, reduction of interest rate, combined facility, additions of plafond</i>
Perpanjangan jangka waktu pinjaman	170.946.929	118.750.052	<i>Extension of credit period</i>
Penjadwalan kembali angsuran dan perpanjangan jangka waktu pinjaman	3.076.349.302	3.437.404.034	<i>Rescheduling of installments and the extension of credit period</i>
Penjadwalan kembali angsuran pinjaman	138.054.113	-	<i>Rescheduling of installment loans</i>
Jumlah pinjaman yang direstrukturisasi	6.430.209.331	7.169.668.677	<i>Total restructured loans</i>
Dikurangi: Cadangan kerugian penurunan nilai	(609.957.065)	(448.142.723)	<i>Less: Allowance for impairment losses</i>
<b>Jumlah</b>	<b>5.820.252.266</b>	<b>6.721.525.954</b>	<b>Total</b>

Sehubungan dengan restrukturisasi dan relaksasi kredit sebagai dampak dari COVID-19, regulator mengeluarkan POJK No. 11/POJK.03/2020 tanggal 16 Maret 2020 tentang Stimulus Perekonomian Nasional sebagai Kebijakan *Countercyclical* Dampak Penyebaran COVID-19 yang kemudian diperbaharui dengan POJK No. 48/POJK.03/2020 tanggal 1 Desember 2020 dan diperbaharui dengan POJK 17/POJK.03/2021 tanggal 10 September 2021. Jumlah pinjaman yang diberikan yang telah direstrukturisasi akibat dampak pandemi COVID-19 pada tanggal 31 Desember 2021 dan 2020 adalah sebesar Rp5.357.083.947 dan Rp5.743.805.247.

*In relation to loan restructuring and relaxation due to COVID-19 impact, the regulator issued POJK No. 11/POJK.03/2020 dated March 16, 2020 regarding National Economy Stimulus as the COVID-19 Outbreak Impact Countercyclical Policy that amended to POJK No. 48/POJK.03/2020 dated December 1, 2020 and reamend under POJK17/POJK.03/2021 dated on September 10, 2021. The amount of loan that have been restructured as a result of the COVID-19 pandemic as of December 31, 2021 and 2020 amounting Rp5,357,083,947 and Rp5,743,805,247.*

**i. Pembiayaan syariah**

**i. Sharia financing**

Rincian pembiayaan dan piutang syariah pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

*The details of sharia financing and receivables as of December 31, 2021 and 2020 are as follows:*

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Pembiayaan <i>Musarakah</i>	585.766.229	938.148.737	<i>Musarakah financing</i>
Piutang <i>Murabahah</i>	215.419.088	220.403.751	<i>Murabahah receivables</i>
Pembiayaan <i>Mudharabah</i>	4.099.239	6.816.777	<i>Mudharabah financing</i>
Piutang <i>Ijarah</i>	684.746	1.602.331	<i>Ijarah receivables</i>
Jumlah pembiayaan dan piutang syariah	805.969.302	1.166.971.596	<i>Total sharia financing and receivables</i>
Dikurangi: Cadangan kerugian penurunan nilai	(50.771.005)	(26.397.938)	<i>Less: Allowance for impairment losses</i>
<b>Jumlah pembiayaan dan piutang syariah - bersih</b>	<b>755.198.297</b>	<b>1.140.573.658</b>	<b>Total sharia financing and receivables - net</b>

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**11. LOANS, SHARIA FINANCING AND  
RECEIVABLES (continued)**

**j. Perubahan cadangan kerugian penurunan nilai**

**j. The changes in allowance for impairment losses**

	31 Desember/ December 31, 2021					
	Stage 1	Stage 2	Stage 3	Syariah/ Sharia	Jumlah/ Total	
<b>Saldo awal tahun</b>	65.730.234	139.842.398	365.407.697	26.397.937	597.378.266	<b>Balance beginning of year</b>
Transfer ke kerugian kredit ekspektasian 12 bulan (Stage 1)	41.036.363	(40.834.071)	(202.292)	-	-	Transfer to 12 month expected credit losses (Stage 1)
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (Stage 2)	(11.539.556)	12.424.514	(884.958)	-	-	Transfer to lifetime expected credit losses (Stage 2)
Transfer ke kredit yang mengalami penurunan nilai (Stage 3)	(1.116.461)	(32.287.121)	33.403.582	-	-	Transfer to credit impaired (Stage 3)
Total saldo awal setelah pengalihan	94.110.580	79.145.720	397.724.029	26.397.937	597.378.266	Transfer to credit impaired (Stage 3)
Pengukuran kembali bersih penyisihan kerugian	5.018.449	29.719.963	503.181.587	17.682.686	555.602.685	Net remeasurement of carrying amount
Aset keuangan yang baru diterbitkan atau dibeli	19.284.830	-	-	-	19.284.830	New financial asset originated or purchased
Aset keuangan yang dihentikan pengakuannya	(14.815.038)	(29.065.366)	(7.038.788)	(4.315.386)	(55.234.578)	Derecognized financial assets
Penerimaan Kembali pembiayaan dan piutang syariah yang telah dihapusbukkan tahun berjalan	-	-	-	17.927.593	17.927.593	Net change in exposure recoveries from written-off financing and sharia receivables during the year
Aset keuangan yang dihapusbuku	-	-	(425.763.218)	(6.921.825)	(432.685.043)	Written-off financial assets
Total pembentukan/(pembalikan) tahun	9.488.241	654.597	70.379.581	24.373.068	104.895.487	Net change in exposure
<b>Saldo akhir tahun</b>	<b>103.598.821</b>	<b>79.800.317</b>	<b>468.103.610</b>	<b>50.771.005</b>	<b>702.273.753</b>	<b>Balance end of year</b>
	31 Desember/ December 31, 2020					
	Stage 1	Stage 2	Stage 3	Syariah/ Sharia	Jumlah/ Total	
<b>Saldo awal tahun</b>	17.921.500	52.198.397	293.250.984	22.010.417	385.381.298	<b>Balance beginning of year</b>
Dampak penerapan awal PSAK 71	52.556.039	100.928.983	104.159.013	-	257.644.035	Effect on initial implementation of SFAS 71 (refer to Note 52)
Saldo, setelah dampak penerapan awal PSAK 71	70.477.539	153.127.380	397.409.997	22.010.417	643.025.333	Balance, after effect on initial implementation SFAS 71
Transfer ke kerugian kredit ekspektasian 12 bulan (Stage 1)	8.938.248	(6.911.618)	(2.026.630)	-	-	Transfer to 12 months expected credit losses (Stage 1)
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (Stage 2)	(10.490.132)	11.621.310	(1.131.178)	-	-	Transfer to lifetime expected credit losses (Stage 2)
Transfer ke kredit yang mengalami penurunan nilai (Stage 3)	(1.427.015)	(92.054.872)	93.481.887	-	-	Transfer to credit impaired (Stage 3)
Total saldo awal setelah pengalihan	67.498.640	65.782.200	487.734.076	22.010.417	643.025.333	Transfer to credit impaired (Stage 3)
Pengukuran kembali bersih nilai tercatat	2.917.616	61.725.447	318.768.499	(139.764)	383.271.798	Net remeasurement of carrying amount
Aset keuangan yang baru diterbitkan atau dibeli	11.417.694	31.245.058	25.646.404	874.626	69.183.782	New financial asset originated or purchased
Aset keuangan yang dihentikan pengakuannya	(16.103.716)	(18.910.307)	(66.682.841)	(1.469.725)	(103.166.589)	Derecognized financial assets
Aset keuangan yang dihapusbuku	-	-	(400.058.441)	-	(400.058.441)	Written-off financial assets
Penerimaan Kembali pembiayaan dan piutang Syariah yang telah dihapusbukkan tahun berjalan	-	-	-	5.122.383	5.122.383	Net change in exposure recoveries from written-off financing and sharia receivables during the year
Total penambahan/(pengurangan) tahun	(1.768.406)	74.060.198	(122.326.379)	4.387.520	(45.647.067)	Net change in exposure
<b>Saldo akhir tahun</b>	<b>65.730.234</b>	<b>139.842.398</b>	<b>365.407.697</b>	<b>26.397.937</b>	<b>597.378.266</b>	<b>Balance end of year</b>

Manajemen Grup berpendapat bahwa cadangan kerugian penurunan nilai untuk pinjaman yang diberikan, pembiayaan dan piutang syariah adalah cukup untuk menutup kerugian yang mungkin timbul akibat tidak tertagihnya pinjaman.

The Group's management believe that allowance for impairment losses of loans, sharia financing and receivables is adequate to cover impairment losses that might arise from uncollectible loans.

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**11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN  
DAN PIUTANG SYARIAH (lanjutan)**

- k. Pada tanggal 26 Desember 2018, OJK mengeluarkan ketentuan baru yaitu No. 32/POJK.03/2018 tentang "Batas Maksimum Pemberian Kredit dan Penyediaan Dana Besar bagi Bank Umum" yang berlaku efektif sejak 1 September 2019 yang sebagian pasalnya diubah dengan POJK No. 38/POJK.03/2019 tanggal 19 Desember 2019. Peraturan tersebut menetapkan batas maksimum penyediaan dana kepada satu debitur dan/atau kelompok debitur yang bukan merupakan pihak berelasi tidak melebihi 25% dari modal inti Bank. Pada tanggal 31 Desember 2021 dan 2020 tidak terdapat pelampauan dan pelanggaran atas BMPK baik kepada pihak berelasi maupun pihak ketiga.
- l. Jaminan atas pinjaman yang diberikan berupa tanah, bangunan, saham, giro, deposito berjangka, mesin, persediaan, dan piutang. Deposito berjangka yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2021 dan 2020 masing-masing sebesar Rp530.531.597 dan Rp879.944.127 (Catatan 19) dengan *outstanding* pinjaman masing-masing sebesar Rp489.675.283 dan Rp789.532.269. Giro yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2021 dan 2020 masing-masing sebesar Rp68.943.934 dan Rp593.495.988 (Catatan 19) dengan *outstanding* pinjaman masing-masing sebesar Rp70.688.008 dan Rp563.912.500. Deposito berjangka *Mudharabah* yang dijadikan jaminan atas piutang dan pembiayaan masing-masing berjumlah Rp237.600.000 dan Rp273.135.000 pada tanggal 31 Desember 2021 dan 2020 (Catatan 25).

**12. PENYERTAAN SAHAM**

	<u>31 Desember/December 31,</u>		
	<u>2021</u>	<u>2020</u>	
<b>Diukur pada FVTPL</b>			<b>Measured at FVTPL</b>
PT Bima Multi finance	34.857.769	57.338.561	PT Bima Multi finance
<b>Diukur pada FVOCI</b>			<b>Measured at FVOCI</b>
PT Aplikasinusa Lintas Arta	29.469	29.469	PT Aplikasinusa Lintas Arta
<b>Jumlah</b>	<b>34.887.238</b>	<b>57.368.030</b>	<b>Total</b>
Cadangan kerugian penurunan nilai	(295)	(295)	Allowance for impairment losses
<b>Jumlah - bersih</b>	<b>34.886.943</b>	<b>57.367.735</b>	<b>Total - net</b>

**11. LOANS, SHARIA FINANCING AND  
RECEIVABLES (continued)**

- k. On December 26, 2018, OJK issued new regulation No. 32/POJK.03/2018 regarding "Legal Lending Limit and Large Exposure for Commercial Bank" which effective since September 1, 2019, which amended partially by POJK No. 38/POJK.03/2019 dated December 19, 2019. This regulation requires the maximum lending limit to one and/or group of nonrelated party debtor which not exceed to 25% of the Bank's core capital. As of December 31, 2021 and 2020, there were no breach and no violation of the LLL requirements both to related parties and third parties.
- l. Collaterals for loans are in form of as land, building, shares, demand deposits, time deposits, machinery, inventories, and receivables. Time deposits that are pledged as cash collateral for loans as of December 31, 2021 and 2020 amounted to Rp530,531,597 and Rp879,944,127 (Note 19) with loan outstanding of Rp489,675,283 and Rp789,532,269, respectively. Demand deposits that are pledged as cash collateral for loans as of December 31, 2021 and 2020 amounted to Rp68,943,934 and Rp593,495,988 (Note 19) with loan outstanding of Rp70,688,008 and Rp563,912,500, respectively. *Mudharabah* time deposits that are pledged as collateral for receivables and financing are amounted to Rp237,600,000 and Rp273,135,000 as of December 31, 2021 and 2020, respectively (Note 25).

**12. INVESTMENTS IN SHARES**

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**12. PENYERTAAN SAHAM (lanjutan)**

Berdasarkan Berita Acara Rapat Umum Luar Biasa para Pemegang Saham PT Bima Multi Finance tertanggal 12 November 2018 dan Akta Notaris No.19 tanggal 12 Maret 2019 yang dibuat dihadapan Drs. Wijanto Suwongso, SH., Notaris di Jakarta, Bank dan beberapa kreditur lainnya telah menyetujui konversi pinjaman jangka panjang dan MTN PT Bima Multi Finance menjadi saham dengan nilai konversi Rp500 per lembar saham (nilai Rupiah penuh). Perubahan ini telah diterima dan dicatat di dalam database Sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan Surat No. AHU-AH.01.03-0151322 tanggal 15 Maret 2019. Melalui proses konversi ini, Bank memiliki persentase kepemilikan sebesar 34,91% di PT Bima Multi Finance dan mencatatnya sebagai penyertaan saham sementara sebesar Rp168.907.325 (bruto). Setelah mencatat penyertaan saham sementara, Bank tidak lagi mengakui pinjaman yang diberikan dan MTN pada PT Bima Multi Finance.

Bank wajib untuk melakukan divestasi penyertaan saham sementara apabila penyertaan saham sementara telah melebihi jangka waktu paling lama 5 (lima) tahun atau PT Bima Multi Finance telah mencatatkan saldo laba positif pada ekuitasnya. Hal ini sesuai dengan intensi dari Bank untuk menjual penyertaan saham sementara pada PT Bima Multi Finance apabila telah memenuhi kriteria yang ditentukan.

Bank juga tidak memiliki pengaruh signifikan pada PT Bima Multi Finance dibuktikan dengan:

- i. Tidak terdapat wakil dari Bank yang menjabat sebagai Dewan Direksi dan Dewan Komisaris atau organ setara di PT Bima Multi Finance;
- ii. Bank tidak berpartisipasi dalam proses pembuatan kebijakan, termasuk dalam partisipasi dalam pengambilan keputusan tentang dividen atau distribusi lain pada PT Bima Multi Finance;
- iii. Tidak adanya transaksi material antara Bank dengan PT Bima Multi Finance;
- iv. Tidak terdapat pertukaran personil manajerial antara Bank dengan PT Bima Multi Finance; dan
- v. Bank tidak terlibat dalam penyediaan teknis informasi pokok untuk PT Bima Multi Finance.

Lihat Catatan 47 untuk pengukuran nilai wajar penyertaan saham sementara pada tanggal 31 Desember 2021 dan 2020.

**12. INVESTMENTS IN SHARES (continued)**

Based on the Minutes of Extraordinary Shareholders Meeting of PT Bima Multi Finance dated November 12, 2018 and Notarial Deed No.19 dated March 12, 2019 of Drs. Wijanto Suwongso, S.H., a Notary in Jakarta, Bank and the other creditors have agreed on the conversion from long term loan and MTN of PT Bima Multi Finance into shares with conversion rate of Rp500 per shares (Rupiah full amount). This changes has been accepted and recorded in database of Legal Entities Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia in its Letter No. AHU-AH.01.03-0151322 dated March 15, 2019. From this conversion process, Bank has 34.91% percentage of ownership in PT Bima Multi Finance and recorded as temporary investment in shares amounted to Rp168,907,325 (gross). After recording a temporary investment in shares, the Bank no longer recognise the loans and MTN in PT Bima Multi Finance.

Banks are obliged to divest temporary investment in shares if the temporary investment in shares have exceeded a maximum period of 5 (five) years or PT Bima Multi Finance has recorded positive retained earnings in their equity. This is in accordance with the Bank's intention to sell the temporary investment in PT Bima Multi Finance if it has meets the specified criteria.

Bank also does not have a significant influence on PT Bima Multi Finance as evidenced by:

- i. There is no representative from the Bank who serves as the Board of Directors and the Board of the Commissioners or equivalent organs in PT Bima Multi Finance;
- ii. The Bank does not participate in the policy-making process, including participation in decision-making about dividends or other distributions in PT Bima Multi Finance;
- iii. There is no material transaction between the Bank and PT Bima Multi Finance;
- iv. There is no managerial personnel exchange between the Bank and PT Bima Multi Finance; and
- v. The Bank is not involved in providing principal technical information for PT Bima Multi Finance.

Refer to Note 47 for fair value measurement of temporary investment in shares as of December 31, 2021 and 2020.

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**12. PENYERTAAN SAHAM (lanjutan)**

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

**12. INVESTMENTS IN SHARES (continued)**

Management believes that the above allowance for impairment losses is adequate.

**13. BIAYA DIBAYAR DIMUKA**

**13. PREPAID EXPENSES**

	31 Desember/December 31,		
	2021	2020	
Promosi	5.125.511	7.189.323	Promotion
Pembiayaan	324.585	5.338.452	Financing
Pengembangan teknologi	1.369.768	2.502.128	Technology development
Sewa dibayar dimuka	172.854	1.497.599	Prepaid rent
Renovasi gedung kantor	5.019.521	1.168.026	Office building renovation
Lain-lain	2.442.287	3.304.330	Others
<b>Jumlah</b>	<b>14.454.526</b>	<b>20.999.858</b>	<b>Total</b>

Lain-lain sebagian besar terdiri dari premi asuransi dibayar dimuka, biaya keanggotaan OJK, biaya dibayar dimuka personalia dan biaya jasa pengantaran uang.

Others mainly consists of prepaid insurances, OJK membership fees, prepaid salaries expenses and cash delivery services.

**14. ASET TETAP DAN ASET GUNA USAHA**

**14. FIXED ASSETS AND RIGHT-OF-USE ASSETS**

Aset tetap terdiri dari:

Fixed assets consist of the following:

	31 Desember/December 31,		
	2021	2020	
Kepemilikan langsung	491.681.438	533.188.331	Direct ownership
Aset hak-guna	16.437.910	26.485.023	Right-of-use assets
<b>Jumlah</b>	<b>508.119.348</b>	<b>559.673.354</b>	<b>Total</b>

	31 Desember/ December 31, 2021							
	Saldo awal/ Beginning balance	Penambahan/ Additions	Pengurangan/ Deductions	Kapitalisasi/ Capitalisation	Reklasifikasi/ Reclassification	Revaluasi/ Revaluation	Saldo akhir/ Ending balance	
<b>Biaya Perolehan</b>								<b>Acquisition Cost</b>
<b>Kepemilikan langsung:</b>								<b>Direct ownership:</b>
Tanah	432.338.963	-	(19.953.332)	-	-	-	412.385.631	Land
Bangunan	78.407.220	-	(5.322.475)	19.161	-	-	73.103.906	Buildings
Kendaraan bermotor	8.252.726	490.850	(317.390)	-	-	-	8.426.186	Vehicles
Mesin-mesin dan peralatan	28.124.989	544.678	(261.201)	-	-	-	28.408.466	Machinery and equipment
Perlengkapan dan perabotan kantor	7.899.910	59.223	(383.133)	-	-	-	7.576.000	Office furniture and equipment
Aset tetap dalam proses pembangunan	21.077.206	4.774	-	-	-	-	21.081.980	Assets under constructions
<b>Jumlah biaya perolehan</b>	<b>576.101.014</b>	<b>1.099.525</b>	<b>(26.237.531)</b>	<b>19.161</b>	<b>-</b>	<b>-</b>	<b>550.982.169</b>	<b>Total acquisition cost</b>
<b>Akumulasi Penyusutan</b>								<b>Accumulated Depreciation</b>
<b>Kepemilikan langsung:</b>								<b>Direct ownership:</b>
Bangunan	5.875.734	13.571.310	(166.688)	-	-	-	19.280.356	Buildings
Kendaraan bermotor	5.950.189	1.316.211	(214.545)	-	-	-	7.051.855	Vehicles
Mesin-mesin dan peralatan	24.178.218	2.065.959	(467.111)	-	-	-	25.777.066	Machinery and equipment
Perlengkapan dan perabotan kantor	6.908.542	560.105	(277.193)	-	-	-	7.191.454	Office furniture and equipment
<b>Jumlah akumulasi penyusutan</b>	<b>42.912.683</b>	<b>17.513.585</b>	<b>(1.125.537)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>59.300.731</b>	<b>Total accumulated depreciation</b>
<b>Nilai buku neto</b>	<b>533.188.331</b>						<b>491.681.438</b>	<b>Net book value</b>



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**14. ASET TETAP DAN ASET GUNA USAHA  
(lanjutan)**

**14. FIXED ASSETS AND RIGHT-OF-USE ASSETS  
(continued)**

31 Desember/ December 31, 2021							
Saldo awal/ Beginning balance	Penambahan/ Additions	Pengurangan/ Disposals	Reklasifikasi/ Reclassification	Saldo akhir/ Ending balance			
Aset hak-guna						<b>Right-of-use assets</b>	
Bangunan	48.062.337	2.502.853	(2.065.514)	-	48.499.676	Buildings	
Akumulasi Penyusutan						<b>Accumulated Depreciation</b>	
Bangunan	21.577.314	12.508.226	(2.023.774)	-	32.061.766	Buildings	
<b>Nilai buku neto</b>	<b>26.485.023</b>				<b>16.437.910</b>	<b>Net book value</b>	
31 Desember/ December 31, 2020							
Saldo awal/ Beginning balance	Penambahan/ Additions	Pengurangan/ Deductions	Kapitalisasi/ Capitalisation	Reklasifikasi/ Reclassification*	Revaluasi/ Revaluation	Saldo akhir/ Ending balance	
<b>Biaya Perolehan</b>							<b>Acquisition Cost</b>
<b>Kepemilikan langsung:</b>							<b>Direct ownership:</b>
Tanah	418.479.814	-	(21.702.000)	-	(5.008.000)	432.338.963	Land
Bangunan	105.766.819	363.838	(6.250.000)	93.000	(1.380.000)	78.407.220	Buildings
Kendaraan bermotor	8.502.632	-	(260.406)	10.500	-	8.252.726	Vehicles
Mesin-mesin dan peralatan	26.698.896	2.078.086	(651.993)	-	-	28.124.989	Machinery and equipment
Perlengkapan dan perabotan kantor	8.355.202	49.478	(504.770)	-	-	7.899.910	Office furniture and equipment
Aset tetap dalam proses pembangunan	20.985.582	91.624	-	-	-	21.077.206	Assets under constructions
<b>Jumlah biaya perolehan</b>	<b>588.788.945</b>	<b>2.583.026</b>	<b>(29.369.169)</b>	<b>103.500</b>	<b>(6.388.000)</b>	<b>20.382.712</b>	<b>Total acquisition cost</b>
<b>Akumulasi Penyusutan</b>							<b>Accumulated Depreciation</b>
<b>Kepemilikan langsung:</b>							<b>Direct ownership:</b>
Bangunan	34.153.321	10.032.756	(1.917.854)	-	(646.250)	(35.746.239)	Buildings
Kendaraan bermotor	4.742.109	1.468.486	(260.406)	-	-	-	Vehicles
Mesin-mesin dan peralatan	21.470.197	3.352.926	(644.905)	-	-	-	Machinery and equipment
Perlengkapan dan perabotan kantor	6.687.534	677.677	(456.669)	-	-	-	Office furniture and equipment
<b>Jumlah akumulasi penyusutan</b>	<b>67.053.161</b>	<b>15.531.845</b>	<b>(3.279.834)</b>	<b>-</b>	<b>(646.250)</b>	<b>(35.746.239)</b>	<b>Total accumulated depreciation</b>
<b>Nilai buku neto</b>	<b>521.735.784</b>					<b>533.188.331</b>	<b>Net book value</b>

<sup>1)</sup> Pada tanggal 31 Desember 2020, terdapat tanah dan bangunan yang direklasifikasi menjadi aset lain-lain sebesar Rp5.741.750.

As of December 31, 2020, there were land and building which reclassified<sup>1)</sup> into other assets amounted to Rp5,741,750.

31 Desember/ December 31, 2020						
Dampak PSAK 73/ Impact of SFAS 73	Saldo awal yang d disesuaikan/ Adjusted beginning balance	Penambahan/ Additions	Pengurangan/ Disposals	Saldo akhir/ Ending balance		
Aset hak-guna					<b>Right-of-use assets</b>	
Bangunan	36.129.803	36.129.803	11.932.534	-	48.062.337	Buildings
Akumulasi Penyusutan					<b>Accumulated Depreciation</b>	
Bangunan	9.104.173	9.104.173	12.473.141	-	21.577.314	Buildings
<b>Nilai buku neto</b>	<b>27.025.630</b>				<b>26.485.023</b>	<b>Net book value</b>

Pada tanggal 31 Desember 2021 dan 2020, penyusutan yang dibebankan pada beban umum dan administrasi sebagai berikut:

As of December 31, 2021 and 2020, depreciation charged to general and administrative expense as follows:

	31 Desember/December 31,		
	2021	2020	
Penyusutan aset tetap	17.513.585	15.531.845	Depreciation of fixed asset
Penyusutan sewa guna usaha (Catatan 34)	12.508.226	12.473.141	Depreciation of right-of-use asset (Note 34)
<b>Jumlah</b>	<b>30.021.811</b>	<b>28.004.986</b>	<b>Total</b>

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**14. ASET TETAP DAN ASET GUNA USAHA  
(lanjutan)**

Rincian laba/(rugi) penjualan aset tetap adalah sebagai berikut:

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Hasil penjualan aset tetap	22.013.374	26.956.623	Proceeds from sale of fixed assets
Nilai buku	25.111.994	26.041.234	Book value
<b>(Rugi)/Laba penjualan aset tetap</b>	<b>(3.098.620)</b>	<b>915.389</b>	<b>(Loss)/Gain on sale of fixed assets</b>

Pada tanggal 31 Desember 2021 dan 2020, Grup telah melakukan hapus buku terhadap aset tetap yang sudah usang dan tidak bisa digunakan masing-masing sebesar nihil dan Rp48.101.

Laba/(rugi) penjualan aset tetap disajikan sebagai bagian dari akun "Beban non-operasional - Neto" pada laporan laba rugi dan penghasilan komprehensif konsolidasian (Catatan 37).

Aset tetap dalam proses pembangunan pada tanggal 31 Desember 2021 dan 2020 masing-masing sebesar Rp21.081.980 dan Rp21.077.206, merupakan tanah dan bangunan yang dibeli dan masih dalam tahap perizinan dan perpanjangan Surat Hak Guna Bangunan (SHGB). Konstruksi tersebut diperkirakan akan selesai pada tahun 2022.

Grup memiliki beberapa bidang tanah yang terletak di Jakarta, Bekasi, Surabaya, dan Denpasar dengan hak kepemilikan berupa Hak Guna Bangunan yang berjangka waktu antara 20 (dua puluh) sampai dengan 30 (tiga puluh) tahun yang akan jatuh tempo dalam berbagai tahun sampai tahun 2042. Manajemen berpendapat bahwa tidak terdapat masalah dengan perpanjangan hak atas tanah karena seluruh tanah diperoleh secara sah dan didukung dengan bukti pemilikan yang memadai.

Aset tetap, kecuali tanah, diasuransikan terhadap risiko kebakaran dan pencurian kepada PT Victoria Insurance (pihak berelasi), PT Zurich Asuransi Indonesia Tbk dan PT Asuransi Takaful Umum dengan nilai pertanggungan seluruhnya pada tanggal 31 Desember 2021 dan 2020 masing-masing sebesar Rp177.223.197 dan Rp221.326.930. Manajemen Grup berpendapat bahwa nilai pertanggungan tersebut telah memadai untuk menutup kemungkinan kerugian atas aset tetap yang dipertanggungjawabkan.

**14. FIXED ASSETS AND RIGHT-OF-USE ASSETS  
(continued)**

The details of gain/(loss) on sale of fixed assets are as follows:

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Hasil penjualan aset tetap	22.013.374	26.956.623	Proceeds from sale of fixed assets
Nilai buku	25.111.994	26.041.234	Book value
<b>(Rugi)/Laba penjualan aset tetap</b>	<b>(3.098.620)</b>	<b>915.389</b>	<b>(Loss)/Gain on sale of fixed assets</b>

As of December 31, 2021 and 2020, Group has written-off the obsolete and unusable fixed assets amounting to nihil and Rp48,101, respectively.

Gain/(loss) on sale of fixed assets is presented as part of "Non-operating expense - Net" in the consolidated profit and loss (Note 37).

Assets under construction as of December 31, 2021 and 2020 amounting to Rp21,081,980 and Rp21,077,206, respectively, related to land and buildings that were bought but still under licensing phase and extension of Rights to Build (SHGB). Those constructions are estimated to be completed on 2022.

The Group own several fields of land in Jakarta, Bekasi, Surabaya, and Denpasar with Building Usage Rights (HGB) for 20 (twenty) up to 30 (thirty) years which will expire in various years up to 2042. The management believes that there will be no difficulty in the extension of the land rights since all of the land were acquired legally and supported by sufficient evidence of ownership.

Fixed assets, except land, are insured against losses by fire and theft risks to PT Victoria Insurance (related party), PT Zurich Asuransi Indonesia Tbk dan PT Asuransi Takaful Umum with total insurance coverage as of December 31, 2021 and 2020 amounting Rp177,223,197 and Rp221,326,930. The Group's management believe that the insurance coverage is adequate to cover possible losses on fixed assets insured.



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**14. ASET TETAP (lanjutan)**

Penilaian pada nilai wajar aset tetap yang dimiliki Bank pada 31 Desember 2020 telah dilakukan oleh Kantor Jasa Penilai Publik ("KJPP") Antonius Setiady dan Rekan tertanggal 26 Februari 2021 yang ditandatangani oleh Andrius Hermawan, MAPPI (Cert), penilai independen yang telah terdaftar pada OJK.

Metode penilaian yang digunakan adalah Metode Pendekatan Data Pasar dan Metode Biaya. Data pembandingan untuk menentukan nilai wajar aset diperoleh dari data transaksi jual beli dari aset sebanding dengan menyesuaikan perbedaan-perbedaan antara aset yang dinilai dengan data pembandingan. Perbandingan ini juga menyangkut berbagai faktor seperti lokasi, luas, bentuk, karakteristik dan kegunaannya berdasarkan unsur waktu dan peruntukannya.

Surplus revaluasi tahun 2020 sebesar Rp56.128.951 telah dikreditkan pada pendapatan komprehensif lainnya dan disajikan sebagai "Surplus revaluasi aset tetap" di ekuitas.

Pada tanggal 31 Desember 2021, terdapat penambahan atas saldo revaluasi aset tetap sebesar Rp7.083.877 disebabkan oleh reversal cadangan pajak yang dibentuk oleh bank atas surplus revaluasi aset tetap tahun 2020.

Pada tanggal 31 Desember 2021 dan 2020, saldo surplus revaluasi aset tetap masing-masing adalah sebesar Rp382.456.152 dan Rp375.372.275.

**15. AGUNAN YANG DIAMBIL ALIH**

Agunan yang diambil alih untuk penyelesaian pinjaman yang diberikan dicatat dalam akun Agunan yang Diambil Alih ("AYDA"). Rincian dalam akun ini adalah:

	<u>31 Desember/December 31,</u>		
	<u>2021</u>	<u>2020</u>	
Tanah dan bangunan	1.436.697.691	1.645.774.259	Land and building
Dikurangi:			Less:
Cadangan kerugian penurunan nilai	(282.641.086)	(278.062.370)	Allowance for impairment losses
	<u>1.154.056.605</u>	<u>1.367.711.889</u>	

Berdasarkan peraturan BI (PBI) No. 14/15/PBI/2012 tanggal 24 Oktober 2012 tentang "Penilaian Kualitas Aktiva Bank Umum", khususnya agunan yang diambil alih, Group diwajibkan untuk melakukan upaya penyelesaian terhadap agunan yang diambil alih yang dimiliki.

**14. FIXED ASSETS (continued)**

Valuation to determine the fair value of the Bank's fixed assets as of December 31, 2020 was performed by Kantor Jasa Penilai Publik ("KJPP") Antonius Setiady dan Rekan dated February 26, 2021 which was signed by Andrius Hermawan, MAPPI (Cert), and independent appraiser registered in OJK.

Valuation method used is Market Data Approach and Cost Approach Method. Comparative data to determine fair value asset is obtained from data of sale and purchase transactions from comparable assets by adjusting differences between assets valued and comparable data. This comparison is also concerns factors such as location, size, shape, characteristics and function based on its time and allotment.

The revaluation surplus on 2020 of Rp56,128,951 was credited to other comprehensive income and presented as "Gain on revaluation of fixed assets" in equity.

As of December 31, 2021, Bank has additional of revaluation surplus of fixed assets amounted Rp7.083.877 from tax reserve provided in 2020 for revaluation surplus of fixed assets in 2020.

As of December 31, 2021 and 2020, gain on revaluation of fixed assets amounted to Rp382,456,152 and Rp375,372,275, respectively.

**15. FORECLOSED ASSETS**

Foreclosed assets in settlement of loans are included in Foreclosed assets ("AYDA") account. The details in the account are as follows:

Based on BI Regulation (PBI) No. 14/15/PBI/2012 dated October 24, 2012 regarding "Asset Quality Ratings for Commercial Banks" and particularly on the foreclosed assets, the Group is required to have an action plan for settlement of its foreclosed assets.

The original consolidated financial statements included herein are in Indonesian language.

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**15. AGUNAN YANG DIAMBIL ALIH (lanjutan)**

Mutasi nilai agunan yang diambil alih adalah sebagai berikut:

	31 Desember/December 31,		
	2021	2020	
Saldo awal	1.645.774.259	1.273.552.074	Beginning balance
Penambahan selama tahun berjalan	44.312.071	549.885.879	Addition during the year
Penjualan selama tahun berjalan	(253.388.639)	(177.663.694)	Sales during the year
<b>Saldo akhir</b>	<b>1.436.697.691</b>	<b>1.645.774.259</b>	<b>Ending balance</b>

Mutasi cadangan kerugian penurunan nilai untuk agunan yang diambil alih adalah sebagai berikut:

	31 Desember/December 31,		
	2021	2020	
Saldo awal	278.062.370	168.344.858	Beginning balance
Penambahan selama tahun berjalan	4.578.716	109.717.512	Addition during the year
<b>Saldo akhir</b>	<b>282.641.086</b>	<b>278.062.370</b>	<b>Ending balance</b>

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang telah dibentuk cukup untuk menutup kemungkinan kerugian atas agunan yang diambil alih.

**15. FORECLOSED ASSETS (continued)**

The changes in foreclosed assets are as follows:

The changes in allowance for impairment losses of foreclosed assets are as follows:

Management believes that the allowance for impairment losses is adequate to cover possible losses from foreclosed assets.

**16. ASET TAK BERWUJUD**

**16. INTANGIBLE ASSETS**

	31 Desember/ December 31, 2021					Saldo akhir/ Ending balance	
	Saldo awal/ Beginning balance	Penambahan/ Additions	Pengurangan/ Deductions	Kapitalisasi/ Capitalisation	Reklasifikasi/ Reclassification		
Biaya Perolehan	21.696.208	983.918	-	-	-	22.680.126	Acquisition Cost
Dikurangi: Akumulasi amortisasi	(16.624.972)	(2.860.978)	-	-	-	(19.485.950)	Less: Accumulated amortisation
<b>Nilai buku neto</b>	<b>5.071.236</b>					<b>3.194.176</b>	<b>Net book value</b>

	31 Desember/ December 31, 2020					Saldo akhir/ Ending balance	
	Saldo awal/ Beginning balance	Penambahan/ Additions	Pengurangan/ Deductions	Kapitalisasi/ Capitalisation	Reklasifikasi/ Reclassification		
Biaya Perolehan	20.942.954	753.254	-	-	-	21.696.208	Acquisition Cost
Dikurangi: Akumulasi amortisasi	(13.396.797)	(3.228.175)	-	-	-	(16.624.972)	Less: Accumulated amortisation
<b>Nilai buku neto</b>	<b>7.546.157</b>					<b>5.071.236</b>	<b>Net book value</b>

Amortisasi yang dibebankan pada beban umum dan administrasi masing-masing adalah sebesar Rp2.860.978 dan Rp3.228.175 untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 (Catatan 34).

Amortisation charged to general and administrative expenses amounted to Rp2,860,978 and Rp3,228,175 for the years ended December 31, 2021 and 2020, respectively (Note 34).

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**16. ASET TAK BERWUJUD (lanjutan)**

Berdasarkan penelaahan manajemen Grup, tidak terdapat kejadian atau perubahan keadaan yang mengindikasikan adanya penurunan nilai aset tak berwujud pada tanggal 31 Desember 2021 dan 2020.

**16. INTANGIBLE ASSETS (continued)**

Based on the Group's management assessment, there are no events or changes in circumstances indicating an impairment of intangible assets as of December 31, 2021 and 2020.

**17. ASET LAIN-LAIN**

**17. OTHER ASSETS**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Uang muka pada pihak ketiga	19.155.501	11.557.440	<i>Advance payment to third parties</i>
Tagihan pihak ketiga	11.086.540	26.181.425	<i>Receivables from third parties</i>
Uang jaminan	8.194.614	8.080.294	<i>Security deposits</i>
Properti terbengkalai	2.990.040	5.386.365	<i>Abandoned property</i>
Lain-lain	<u>20.691.831</u>	<u>19.477.730</u>	<i>Others</i>
	62.118.526	70.683.254	
Dikurangi:			<i>Less:</i>
Cadangan kerugian penurunan nilai	<u>(34.847.598)</u>	<u>(10.772.884)</u>	<i>Allowance for impairment losses</i>
	<b><u>27.270.928</u></b>	<b><u>59.910.370</u></b>	

Uang jaminan merupakan uang yang disetor sebagai jaminan untuk sewa gedung kantor.

*Security deposits represent deposit pledged as guarantee for building rental.*

Lain-lain terutama terdiri dari tagihan transaksi valuta asing, tagihan biaya administrasi dan persediaan barang promosi.

*Others mainly consists of foreign exchange transaction, administrative expense transaction and promotion inventories.*

Mutasi cadangan kerugian penurunan nilai untuk aset lain-lain adalah sebagai berikut:

*The changes in allowance for impairment losses of other assets are as follows:*

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Saldo awal	10.772.884	1.671.693	<i>Beginning balance</i>
Penambahan selama tahun berjalan	<u>24.074.714</u>	<u>9.101.191</u>	<i>Addition during the year</i>
<b>Saldo akhir</b>	<b><u>34.847.598</u></b>	<b><u>10.772.884</u></b>	<b><i>Ending balance</i></b>

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang telah dibentuk cukup untuk menutup kemungkinan kerugian atas aset lain-lain.

*Management believes that the allowance for impairment losses is adequate to cover possible losses from other assets.*

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**18. LIABILITAS SEGERA**

**18. OBLIGATIONS DUE IMMEDIATELY**

	<u>31 Desember/December 31,</u>		
	<u>2021</u>	<u>2020</u>	
Titipan asuransi	109.202	84.737	<i>Insurance funds</i>
Titipan pembiayaan	4.351	1.913.631	<i>Financing funds</i>
Liabilitas lainnya	<u>222.373</u>	<u>88.230</u>	<i>Other liabilities</i>
	<b><u>335.926</u></b>	<b><u>2.086.598</u></b>	

**19. SIMPANAN NASABAH**

**19. DEPOSITS FROM CUSTOMERS**

Semua simpanan nasabah dalam mata uang Rupiah dan mata uang asing, terdiri dari:

*All deposits from customers in Rupiah and foreign currency, consist of:*

	<u>31 Desember/December 31,</u>		
	<u>2021</u>	<u>2020</u>	
<b>Rupiah</b>			<b><i>Rupiah</i></b>
Deposito berjangka	13.010.941.538	14.060.840.414	<i>Time deposits</i>
Tabungan	3.138.292.184	2.400.501.762	<i>Savings deposits</i>
Giro	<u>1.232.960.133</u>	<u>1.453.095.572</u>	<i>Demand deposits</i>
	<u>17.382.193.855</u>	<u>17.914.437.748</u>	
<b>Mata uang asing</b>			<b><i>Foreign currency</i></b>
Deposito berjangka	608.625.607	287.371.310	<i>Time deposits</i>
Giro	<u>94.052.521</u>	<u>129.620.061</u>	<i>Demand deposits</i>
	<u>702.678.128</u>	<u>416.991.371</u>	
	<b><u>18.084.871.983</u></b>	<b><u>18.331.429.119</u></b>	

Simpanan nasabah dalam mata uang asing adalah Dolar Amerika Serikat, Dolar Singapura, Euro Eropa, dan Yen Jepang.

*All deposits from customers in foreign currency are denominated in United States Dollar, Singapore Dollar, European Euro, and Japanese Yen.*

**a. Giro**

**a. Demand Deposits**

**i. Berdasarkan pihak lawan**

**i. By counterparties**

	<u>31 Desember/December 31,</u>		
	<u>2021</u>	<u>2020</u>	
Pihak berelasi	76.051.716	20.654.221	<i>Related parties</i>
Pihak ketiga	<u>1.250.960.938</u>	<u>1.562.031.412</u>	<i>Third parties</i>
<b>Jumlah</b>	<b><u>1.327.012.654</u></b>	<b><u>1.582.715.633</u></b>	<b><i>Total</i></b>



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**19. SIMPANAN NASABAH (lanjutan)**

**a. Giro (lanjutan)**

**ii. Berdasarkan mata uang**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Rupiah	1.232.960.133	1.453.095.572	
Dolar Amerika	90.147.569	128.958.061	United States Dollar
Yen Jepang	2.335.911	211.414	Japanese Yen
Euro Eropa	782.922	450.178	European Euro
Dolar Singapura	786.119	408	Singapore Dollar
<b>Jumlah</b>	<b><u>1.327.012.654</u></b>	<b><u>1.582.715.633</u></b>	<b>Total</b>

Pada tanggal 31 Desember 2021 dan 2020, jumlah giro *Wadiah* pihak ketiga yang berdasarkan pada prinsip perbankan Syariah (Entitas Anak) masing-masing adalah sebesar Rp12.899.204 dan Rp251.344.864.

Giro yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2021 dan 2020 masing-masing adalah sebesar Rp68.943.934 dan Rp593.495.988 (Catatan 11).

**19. DEPOSITS FROM CUSTOMERS (continued)**

**a. Demand Deposits (continued)**

**ii. By currency**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Rupiah	1.232.960.133	1.453.095.572	
Dolar Amerika	90.147.569	128.958.061	United States Dollar
Yen Jepang	2.335.911	211.414	Japanese Yen
Euro Eropa	782.922	450.178	European Euro
Dolar Singapura	786.119	408	Singapore Dollar
<b>Jumlah</b>	<b><u>1.327.012.654</u></b>	<b><u>1.582.715.633</u></b>	<b>Total</b>

As of December 31, 2021 and 2020, *Wadiah* demand deposits from third parties under Sharia banking principles (Subsidiary) amounted to Rp12,899,204 and Rp251,344,864, respectively.

Demand deposits amounting to Rp68,943,934 and Rp593,495,988 are pledged as collateral or blocked as of December 31, 2021 and 2020, respectively (Note 11).

**b. Tabungan**

**Berdasarkan pihak lawan**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Pihak berelasi	28.314.327	42.035.533	Related parties
Pihak ketiga	3.109.977.857	2.358.466.229	Third parties
<b>Jumlah</b>	<b><u>3.138.292.184</u></b>	<b><u>2.400.501.762</u></b>	<b>Total</b>

Semua tabungan nasabah per 31 Desember 2021 dan 2020 dalam mata uang Rupiah.

Pada tanggal 31 Desember 2021 dan 2020, tidak terdapat tabungan yang dijadikan jaminan tunai atas pinjaman yang diberikan.

**b. Savings deposits**

**By counterparties**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Pihak berelasi	28.314.327	42.035.533	Related parties
Pihak ketiga	3.109.977.857	2.358.466.229	Third parties
<b>Jumlah</b>	<b><u>3.138.292.184</u></b>	<b><u>2.400.501.762</u></b>	<b>Total</b>

All saving deposits from customers as of December 31, 2021 and 2020 are denominated in Rupiah.

As of December 31, 2021 and 2020, there are no savings deposits that are pledged as cash collateral.

**c. Deposito berjangka**

**(i) Berdasarkan pihak lawan**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Pihak berelasi	607.935.336	210.854.746	Related parties
Pihak ketiga	13.011.631.809	14.137.356.978	Third parties
<b>Jumlah</b>	<b><u>13.619.567.145</u></b>	<b><u>14.348.211.724</u></b>	<b>Total</b>

**c. Time deposits**

**(i) By counterparties**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Pihak berelasi	607.935.336	210.854.746	Related parties
Pihak ketiga	13.011.631.809	14.137.356.978	Third parties
<b>Jumlah</b>	<b><u>13.619.567.145</u></b>	<b><u>14.348.211.724</u></b>	<b>Total</b>

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**19. SIMPANAN NASABAH (lanjutan)**

**19. DEPOSITS FROM CUSTOMERS (continued)**

**c. Deposito berjangka (lanjutan)**

**c. Time deposits (continued)**

**(ii) Berdasarkan mata uang**

**(ii) By currency**

	31 Desember/December 31,		
	2021	2020	
Rupiah	13.010.941.538	14.060.840.414	Rupiah
Dolar Amerika	608.625.607	287.371.310	United States Dollar
<b>Jumlah</b>	<b>13.619.567.145</b>	<b>14.348.211.724</b>	<b>Total</b>

**(iii) Berdasarkan periode**

**(iii) By period**

	31 Desember/December 31,		
	2021	2020	
1 bulan	6.673.011.290	6.132.669.195	1 month
3 bulan	4.591.028.073	5.570.086.085	3 months
6 bulan	1.593.456.280	1.809.222.289	6 months
12 bulan	762.071.502	836.234.155	12 months
<b>Jumlah</b>	<b>13.619.567.145</b>	<b>14.348.211.724</b>	<b>Total</b>

**(iv) Berdasarkan sisa umur sampai dengan jatuh tempo**

**(iv) By remaining period until maturity**

	31 Desember/December 31,		
	2021	2020	
Kurang dari 1 bulan	7.221.839.563	8.196.400.609	Less than 1 month
1 sampai dengan 3 bulan	4.954.111.582	4.452.950.602	1 up to 3 months
3 sampai dengan 6 bulan	959.247.191	1.154.251.614	3 up to 6 months
6 sampai dengan 12 bulan	484.368.809	544.608.899	6 up to 12 months
<b>Jumlah</b>	<b>13.619.567.145</b>	<b>14.348.211.724</b>	<b>Total</b>

Deposito berjangka yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2021 dan 2020 masing-masing adalah sebesar Rp530.531.597 dan Rp879.944.127 (Catatan 11).

Time deposits which are pledged as collateral on loans as of December 31, 2021 and 2020 amounted to Rp530,531,597 and Rp879,944,127, respectively (Note 11).

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 47.

Informations respect to interest rate are disclosed in Note 47.

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**20. SIMPANAN DARI BANK LAIN**

Semua simpanan dari bank lain adalah dalam mata uang Rupiah dan terdiri dari:

**20. DEPOSITS FROM OTHER BANKS**

All deposits from other banks are denominated in Rupiah and consist of:

	31 Desember/December 31,		
	2021	2020	
Call money	875.000.000	1.615.000.000	Call money
Giro	75.036.150	64.305.246	Demand deposits
SIMA (Sertifikat Investasi Mudharabah Antar Bank)	30.000.000	260.000.000	SIMA (Mudharabah Interbank Investment Certificate)
Tabungan	29.750.696	18.410.571	Savings deposits
Deposito berjangka	25.386.222	101.254.223	Time deposits
Deposito on call	2.000.000	2.000.000	Deposits on call
<b>Jumlah</b>	<b>1.037.173.068</b>	<b>2.060.970.040</b>	<b>Total</b>

**a. Call money**

**a. Call money**

**(i) Berdasarkan pihak lawan**

**(i) By counterparties**

Pihak ketiga	31 Desember/December 31,		Third parties
	2021	2020	
PT Bank Pembangunan Daerah Sulawesi Selatan dan Tengah	315.000.000	-	PT Bank Pembangunan Daerah Sulawesi Selatan dan Tengah
PT Bank Pembangunan Daerah Papua	200.000.000	200.000.000	PT Bank Pembangunan Daerah Papua
PT Bank Jtrust Tbk	90.000.000	-	PT Bank Jtrust Tbk
PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta	70.000.000	-	PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta
PT Bank Sahabat Sampurna	60.000.000	-	PT Bank Sahabat Sampurna
PT Seabank Indonesia	50.000.000	-	PT Seabank Indonesia
PT Bank Bukopin Tbk	50.000.000	-	PT Bank Bukopin Tbk
PT Bank Pembangunan Daerah Kaltim	20.000.000	-	PT Bank Pembangunan Daerah Kaltim
PT Bank Amar Tbk	20.000.000	-	PT Bank Amar Tbk
PT Bank Panin Tbk	-	1.400.000.000	PT Bank Panin Tbk
PT Bank Prima Master	-	15.000.000	PT Bank Prima Master
<b>Jumlah</b>	<b>875.000.000</b>	<b>1.615.000.000</b>	<b>Total</b>

**(ii) Berdasarkan periode**

**(ii) By period**

	31 Desember/December 31,		
	2021	2020	
Kurang dari 1 bulan	875.000.000	-	Less than 1 month
1 bulan - 3 bulan	-	1.615.000.000	1 month - 3 months
<b>Jumlah</b>	<b>875.000.000</b>	<b>1.615.000.000</b>	<b>Total</b>

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**20. SIMPANAN DARI BANK LAIN (lanjutan)**

**20. DEPOSITS FROM OTHER BANKS (continued)**

**b. Deposito berjangka**

**b. Time deposits**

**(i) Berdasarkan pihak lawan**

**(i) By counterparties**

	31 Desember/December 31,		
	2021	2020	
Pihak ketiga	25.386.222	101.254.223	Third parties

**(ii) Berdasarkan periode**

**(ii) By period**

	31 Desember/December 31,		
	2021	2020	
1 bulan	19.186.222	75.344.223	1 month
3 bulan	1.200.000	21.900.000	3 months
6 bulan	-	10.000	6 months
12 bulan	5.000.000	4.000.000	12 months
<b>Jumlah</b>	<b>25.386.222</b>	<b>101.254.223</b>	<b>Total</b>

**(iii) Berdasarkan sisa umur sampai dengan jatuh tempo**

**(iii) By remaining period until maturity**

	31 Desember/December 31,		
	2021	2020	
Kurang dari 1 bulan	17.511.222	69.844.223	Less than 1 month
1 sampai dengan 3 bulan	4.875.000	29.410.000	1 up to 3 months
3 sampai dengan 6 bulan	-	-	3 up to 6 months
6 sampai dengan 12 bulan	3.000.000	2.000.000	6 up to 12 months
<b>Jumlah</b>	<b>25.386.222</b>	<b>101.254.223</b>	<b>Total</b>

**c. Giro dan tabungan**

**c. Demand and saving deposits**

Pada tanggal 31 Desember 2021 dan 2020, tidak terdapat saldo giro dan tabungan dari pihak berelasi.

As of December 31, 2021 and 2020 there are no demand and saving deposits from related parties.

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 46.

Informations in respect to interest rates are disclosed in Note 46.

**d. Simpanan dari Pihak Ketiga**

**d. Deposit from Third Parties**

Simpanan dari bank lain pada tanggal 31 Desember 2021 dan 2020 masing-masing sebesar Rp30.000.000 dan Rp260.000.000 merupakan simpanan syariah dalam bentuk Sertifikat Investasi Mudharabah Antarbank (SIMA) dari pihak ketiga milik entitas anak.

As of December 31, 2021 and 2020, deposit from other banks amounting to Rp30,000,000 and Rp260,000,000, respectively, are sharia deposits in the form of Interbank Mudharabah Investment Certificate (SIMA) from third parties owned by subsidiary.

Tingkat bagi hasil rata-rata per tahun untuk simpanan dari bank lain selama tahun 2021 dan 2020 masing-masing adalah sebesar 3,39% dan 4,74%.

Average annual profit sharing rate for deposit from other banks during 2021 and 2020 are 3.39% and 4.74%, respectively.

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**21. EFEK-EFEK YANG DITERBITKAN**

**21. SECURITIES ISSUED**

	<u>31 Desember/December 31,</u>		
	<u>2021</u>	<u>2020</u>	
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018	350.000.000	350.000.000	<i>Bank Victoria Subordinated Bonds I Phase II Year 2018</i>
Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017	300.000.000	300.000.000	<i>Bank Victoria Self Registration Bonds I Phase I Year 2017</i>
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019	250.000.000	250.000.000	<i>Bank Victoria Subordinated Bonds II Phase I Year 2019</i>
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 Seri B	200.000.000	200.000.000	<i>Bank Victoria Self Registration Bonds I Phase II Year 2018 Series B</i>
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019	150.000.000	150.000.000	<i>Bank Victoria Subordinated Bonds II Phase II Year 2019</i>
Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019	-	100.000.000	<i>Bank Victoria Self Registration Bonds II Phase I Year 2019</i>
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 Seri A	-	100.000.000	<i>Bank Victoria Self Registration Bonds I Phase II Year 2018 Series A</i>
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020	60.000.000	60.000.000	<i>Bank Victoria Subordinated Bonds II Phase III Year 2020</i>
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017	<u>50.000.000</u>	<u>50.000.000</u>	<i>Bank Victoria Subordinated Bonds I Phase I Year 2017</i>
Jumlah	1.360.000.000	1.560.000.000	<i>Total</i>
Dikurangi: biaya emisi yang belum diamortisasi	<u>(11.479.971)</u>	<u>(15.970.998)</u>	<i>Less: unamortised issuance cost</i>
<b>Jumlah</b>	<b><u>1.348.520.029</u></b>	<b><u>1.544.029.002</u></b>	<b><i>Total</i></b>

Obligasi Subordinasi Berkelanjutan II Bank Victoria  
Tahap III Tahun 2020

Pada tanggal 13 Maret 2020 Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 dengan jumlah pokok sebanyak-banyaknya sebesar Rp60.000.000.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 memiliki tingkat suku bunga tetap sebesar 11,25% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi Subordinasi pertama dilakukan pada tanggal 1 Juli 2020, sedangkan pembayaran bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 1 April 2027.

Bank Victoria Subordinated Bonds II Phase III Year  
2020

On March 13, 2020, the Bank issued Bank Victoria Subordinated Bonds II Phase III Year 2020 with a principal amount up to Rp60,000,000.

Bank Victoria Subordinated Bonds II Phase III Year 2020 has fixed rate of 11.25% per annum, and the interest will be paid every 3 (three) months starting from 1 July 2020 for the first payment whereas the last payment will be on April 1, 2027, at the maturity date of the Bond.

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**21. EFEK-EFEK YANG DITERBITKAN (lanjutan)**

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 (lanjutan)

Berdasarkan hasil pemeringkatan surat utang jangka panjang sesuai dengan surat PT Pemeringkat Efek Indonesia (Pefindo) No. RC-329/PEF-DIR/IV/2019 tanggal 4 April 2019 tentang Sertifikat Pemeringkatan Obligasi Subordinasi Berkelanjutan II dari PT Bank Victoria International Tbk sejak 4 April 2019 sampai dengan 1 April 2020, serta konfirmasi sesuai dengan surat Pefindo No. RTG-020/PEF-DIR/II/2020 tanggal 4 Februari 2020 perihal Sertifikat Pemeringkatan Obligasi Subordinasi Berkelanjutan II Tahap III yang diterbitkan melalui rencana Penawaran Umum Berkelanjutan PUB, hasil pemeringkatan Obligasi Subordinasi adalah idBBB.

Pada tanggal 31 Desember 2021 dan 2020, peringkat Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 menurut Pefindo adalah idBBB.

Obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi subordinasi ini adalah PT Bank Mega Tbk. Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2021 dan 2020.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019

Pada tanggal 8 November 2019 Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 sebesar Rp150.000.000.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 memiliki tingkat suku bunga tetap sebesar 11,25% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi Subordinasi pertama dilakukan pada tanggal 8 Februari 2020, sedangkan pembayaran bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 8 November 2026.

**21. SECURITIES ISSUED (continued)**

Bank Victoria Subordinated Bonds II Phase III Year 2020 (continued)

Based on the results of the rating for long-term debt securities in accordance with PT Pemeringkat Efek Indonesia (Pefindo) letter No. RC-329/PEF-DIR/IV/2019 dated April 4, 2019 regarding a Rating Certificate for Continuous Subordinated Bond II of PT Bank Victoria International Tbk from 4 April 2019 to April 1, 2020, as well as the confirmation according to Pefindo letter No. RTG-020/PEF-DIR/II/2020 dated February 4, 2020 regarding the Rating Certificate for Continuous Subordinated Bonds II Phase III issued through the PUB Continuous Public Offering plan, the rating results of the Subordinated Bonds are idBBB.

As of December 31, 2021 and 2020, the rating of the Bank Victoria Subordinated Bonds II Phase III Year 2020 based on Pefindo was idBBB.

The above bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk. There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2021 and 2020.

Bank Victoria Subordinated Bonds II Phase II Year 2019

On November 8, 2019, the Bank issued Bank Victoria Subordinated Bonds II Phase II Year 2019 amounting Rp150,000,000.

Bank Victoria Subordinated Bonds II Phase II Year 2019 has fixed rate of 11.25% per annum, and the interest will be paid every 3 (three) months starting from February 8, 2020 for the first payment whereas the last payment will be on November 8, 2026, at the maturity date of the Bond.

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**21. EFEK-EFEK YANG DITERBITKAN (lanjutan)**

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 (lanjutan)

Berdasarkan Surat Keterangan PT Pemeringkat Efek Indonesia ("Pefindo") No. RTG-129/PEF-DIR/IX/2019 tanggal 26 September 2019 berlaku peringkat sebagaimana tercantum pada Sertifikat Pemeringkatan PT Pemeringkat Efek Indonesia No. RC-329/PEF-DIR/IV/2019 tanggal 4 April 2019 yaitu peringkat idBBB pada Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019.

Pada tanggal 31 Desember 2021 dan 2020, peringkat Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 menurut Pefindo adalah idBBB.

Obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi subordinasi ini adalah PT Bank Mega Tbk. Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi subordinasi pada tanggal 31 Desember 2021 dan 2020.

Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019

Pada tanggal 28 September 2019 Bank menerbitkan Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 masing-masing sebesar Rp100.000.000 dan Rp250.000.000.

Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 diterbitkan dengan tingkat suku bunga tetap sebesar 9,75% per tahun, berjangka waktu 2 (dua) tahun sejak Tanggal Emisi.

Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali terhitung sejak Tanggal Emisi. Pembayaran Bunga Obligasi pertama dilakukan pada tanggal 28 September 2019, sedangkan pembayaran Bunga obligasi terakhir akan dilakukan pada tanggal jatuh tempo obligasi yaitu pada tanggal 28 September 2021.

**21. SECURITIES ISSUED (continued)**

Bank Victoria Subordinated Bonds II Phase II Year 2019 (continued)

Based on the letter issued by PT Pemeringkat Efek Indonesia ("Pefindo") No. RTG-129/PEF-DIR/IX/2019 dated September 26, 2019 apply rating as stated on Rating Certificate PT Pemeringkat Efek Indonesia No. RC-329/PEF-DIR/IV/2019 dated April 4, 2019 which was idBBB on Bank Victoria Subordinated Bonds II Phase II Year 2019.

As of December 31, 2021 and 2020, the rating of the Bank Victoria Subordinated Bonds II Phase II Year 2019 based on Pefindo was idBBB.

The above bond is unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk. There was no violation to the covenant of the subordinated bonds trusteeship agreement as of December 31, 2021 and 2020.

Bank Victoria Self Registration Bonds II Phase I Year 2019 and Subordinated Bonds II Phase I Year 2019

On September 28, 2019, the Bank issued Bank Victoria Self Registration Bonds II Phase I Year 2019 and Subordinated Bonds II Phase I Year 2019 amounting to Rp100,000,000 and Rp250,000,000, respectively.

Bank Victoria Self Registration Bonds II Phase I Year 2019 issued with fixed rate of 9.75% per annum, with tenor 2 (two) years since Emission Date.

Interest on the bonds will be paid every 3 (three) months starting from Emission Date. The first payment was on September 28, 2019 whereas the last payment will be on September 28, 2021, at the maturity date of the Bond.



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**21. EFEK-EFEK YANG DITERBITKAN (lanjutan)**

Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 (lanjutan)

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 memiliki tingkat suku bunga tetap sebesar 11,75% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran Bunga Obligasi Subordinasi pertama dilakukan pada tanggal 28 September 2019, sedangkan pembayaran Bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 28 Juni 2026.

Berdasarkan Sertifikat Pemeringkatan Pefindo No. RC-328/PEF-DIR/IV/2019 dan No. RC-329/PEF-DIR/IV/2019 tanggal 4 April 2019, memutuskan memberikan peringkat idA- terhadap Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 serta memberikan peringkat idBBB pada Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019.

Pada tanggal 31 Desember 2021 and 2020, peringkat Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 menurut Pefindo adalah idA-.

Pada tanggal 31 Desember 2021 dan 2020, peringkat Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 menurut Pefindo adalah idBBB.

Obligasi dan obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi dan obligasi subordinasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2021 dan 2020.

**21. SECURITIES ISSUED (continued)**

Bank Victoria Self Registration Bonds II Phase I Year 2019 and Subordinated Bonds II Phase I Year 2019 (continued)

Bank Victoria Subordinated Bonds II Phase I Year 2019 has fixed rate of 11.75% per annum, and the interest will be paid every 3 (three) months. The first payment was on September 28, 2019, whereas the last payment will be on June 28, 2026, at the maturity date of the Bond.

Based on the report issued by Pefindo No. RC-328/PEF-DIR/IV/2019 and No. RC-329/PEF-DIR/IV/2019 dated April 4, 2019, the rating of Bank Victoria Self Registration Bonds II Phase I Year 2019 is idA-, and the rating of Subordinated Bonds II Phase I Year 2019 is idBBB.

As of December 31, 2021 and 2020, the rating of the Bank Victoria Self Registration Bonds II Phase I Year 2019 based on Pefindo was idA-.

As of December 31, 2021 and 2020, the rating of the Bank Victoria Subordinated Bonds II Phase I Year 2019 based on Pefindo was idBBB.

The above bonds and subordinated bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bonds and subordinated bonds issuance is PT Bank Mega Tbk.

There was no violation to the covenant of the bonds and subordinated bonds trusteeship agreement as of December 31, 2021 and 2020.

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**21. EFEK-EFEK YANG DITERBITKAN (lanjutan)**

Obligasi Berkelanjutan I Bank Victoria Tahap II  
Tahun 2018 dan Obligasi Subordinasi Berkelanjutan  
I Bank Victoria Tahap II 2018

Pada tanggal 5 September 2018 Bank menerbitkan Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 masing-masing sebesar Rp300.000.000 dan Rp350.000.000.

Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 terdiri dari 2 (dua) seri Obligasi, yaitu sebagai berikut:

- Seri A dengan jumlah Pokok Obligasi sebesar Rp100.000.000 dengan tingkat suku bunga tetap sebesar 9,70% per tahun, berjangka waktu 3 (tiga) tahun sejak Tanggal Emisi.
- Seri B dengan jumlah Pokok Obligasi sebesar Rp200.000.000 dengan tingkat bunga tetap sebesar 10,30% per tahun, berjangka waktu 5 (lima) tahun sejak Tanggal Emisi.

Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali. Pembayaran bunga obligasi pertama dilakukan pada tanggal 5 September 2018 sedangkan pembayaran bunga Obligasi terakhir akan dilakukan pada tanggal jatuh tempo masing-masing seri Obligasi yaitu pada tanggal 5 September 2021 untuk Obligasi Seri A dan 5 September 2023 untuk Obligasi Seri B.

Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 memiliki tingkat suku bunga tetap sebesar 11,00% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran Bunga Obligasi Subordinasi pertama dilakukan pada tanggal 5 September 2018, sedangkan pembayaran Bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 5 Juni 2025.

**21. SECURITIES ISSUED (continued)**

Bank Victoria Self Registration Bonds I Phase II  
Year 2018 and Subordinated Bonds I Phase II Year  
2018

On September 5, 2018, the Bank issued Bank Victoria Self Registration Bonds I Phase II Year 2018 and Bank Victoria Subordinated Bonds I Phase II Year 2018 amounting to Rp300,000,000 and Rp350,000,000, respectively.

Bank Victoria Self Registration Bonds I Phase II Year 2018 consists of 2 (two) series of Bonds:

- Series A amounted to Rp100,000,000 with fixed rate of 9.70% per annum, tenor 3 (three) years since Emission Date.
- Series B amounted to Rp200,000,000 with fixed rate of 10.30% per annum, tenor 5 (five) years since Emission Date.

Interest of the bond paid every 3 (three) months starting from September 5, 2018 for the first payment whereas the last payment will be at the maturity date of each Bonds, which on September 5, 2021 for Bonds Series A and on September 5, 2023 for Bonds Series B.

Bank Victoria Subordinated Bonds I Phase II Year 2018 has fixed rate of 11.00% per annum, and the interest will be paid every 3 (three) months. The first payment was on September 5, 2018 whereas the last payment will be on June 5, 2025, at the maturity date of the Bonds and Subordinated Bonds.

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**21. EFEK-EFEK YANG DITERBITKAN (lanjutan)**

Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II 2018 (lanjutan)

Berdasarkan surat keterangan yang diberikan oleh Pefindo No. 031/PEWF-DIR/IV/2018 pada 2 April 2018, keterangan terkait pemeringkatan atas Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 yang diterbitkan melalui rencana Penawaran Umum Berkelanjutan (PUB) terdapat pada surat Sertifikat Pemeringkatan No. 369/PEF-DIR/IV/2018 tanggal 2 April 2018 atas penetapan kembali peringkat Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 yang juga merupakan pemeringkatan atas Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 (berdasarkan pemantauan atas Obligasi Berkelanjutan I Tahun 2017) yakni idA- dan pada surat Sertifikat Pemeringkatan No. 370/PEF-DIR/IV/2018 tanggal 2 April 2018 atas Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I 2017 yang juga merupakan pemeringkatan atas Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II 2018 yakni idBBB.

Pada tanggal 31 Desember 2021 dan 2020, peringkat Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 menurut Pefindo adalah idA-.

Pada tanggal 31 Desember 2021 dan 2020, peringkat Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II 2018 menurut Pefindo adalah idBBB.

Obligasi dan obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2021 dan 2020.

**21. SECURITIES ISSUED (continued)**

Bank Victoria Self Registration Bonds I Phase II Year 2018 and Subordinated Bonds I Phase II Year 2018 (continued)

Based on the letter issued by Pefindo No. 031/PEWF-DIR/IV/2018 dated April 2, 2018, the details related to the rating of Bank Victoria Self Registration Bonds I Phase II Year 2018 and Bank Victoria Subordinated Bonds I Phase II Year 2018 which was issued through Share Registration Public Offering (PUB) were available in the Rating Certificate No. 369/PEF-DIR/IV/2018 dated April 2, 2018 regarding the reassessment of Bank Victoria Self Registration Bonds I Phase I Year 2017 rating, including the assessment of Bank Victoria Self Registration Bonds I Phase II Year 2018 rating which was idA- and in the Rating Certificate No. 370/PEF-DIR/IV/2018 dated April 2, 2018 regarding the reassessment of Bank Victoria Subordinated Bonds I Phase I Year 2017, including the assessment of Bank Victoria Subordinated Bonds I Phase II Year 2018 which was idBBB.

As of December 31, 2021 and 2020, the rating of the Bank Victoria Self Registration Bonds I Phase II Year 2018 based on Pefindo was idA-.

As of December 31, 2021 and 2020, the rating of the Bank Victoria Subordinated Bonds I Phase II Year 2018 based Pefindo was idBBB.

The above bonds and subordinated bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2021 and 2020.

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**21. EFEK-EFEK YANG DITERBITKAN (lanjutan)**

Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017

Pada tanggal 11 Juli 2017, Bank menerbitkan Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 masing-masing sebesar Rp300.000.000 dan Rp50.000.000.

Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 memiliki tingkat suku bunga tetap sebesar 10,30% per tahun, yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga pertama dilakukan pada tanggal 11 Oktober 2017 sedangkan pembayaran bunga obligasi terakhir yang sekaligus menjadi tanggal jatuh tempo obligasi akan dilakukan pada tanggal 11 Juli 2022.

Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 memiliki tingkat suku bunga tetap sebesar 11,00% per tahun, yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga pertama dilakukan pada tanggal 11 Oktober 2017 sedangkan pembayaran bunga obligasi terakhir yang sekaligus menjadi tanggal jatuh tempo obligasi akan dilakukan pada tanggal 11 Juli 2024.

Berdasarkan pemeringkatan yang dilaksanakan oleh Pefindo sesuai dengan Surat No. 369/PEF-Dir/IV/2018 tanggal 2 April 2018, hasil pemeringkatan atas Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 adalah idA- dan Surat No. 370/PEF-Dir/IV/2018 tanggal 2 April 2018, hasil pemeringkatan atas Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 adalah idBBB.

Pada tanggal 31 Desember 2021 dan 2020, peringkat Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 menurut Pefindo adalah idA-.

Pada tanggal 31 Desember 2021 dan 2020, peringkat Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I 2017 menurut Pefindo adalah idBBB.

Obligasi dan obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

**21. SECURITIES ISSUED (continued)**

Bank Victoria Self Registration Bonds I Phase I Year 2017 and Subordinated Bonds I Phase I Year 2017

On July 11, 2017, the Bank issued Bank Victoria Self Registration Bonds I Phase I Year 2017 and Bank Victoria Subordinated Bonds I Phase I Year 2017 amounting to Rp300,000,000 and Rp50,000,000, respectively.

Bank Victoria Self Registration Bonds I Phase I Year 2017 has fixed rate of 10.30% per annum, and the interest will be paid every 3 (three) months. The first payment was on October 11, 2017 whereas the last payment will be on July 11, 2022, at the maturity date of the Bond.

Bank Victoria Subordinated Bonds I Phase I Year 2017 has fixed rate of 11.00% per annum, and the interest will be paid every 3 (three) months. The first payment was on October 11, 2017 whereas the last payment will be on July 11, 2024, at the maturity date of the Bond.

Based on the report issued by Pefindo as stated in its Letter No. 369/PEF-Dir/IV/2018 dated April 2, 2018, the rating of Bank Victoria Self Registration Bonds I Phase I Year 2017 is idA- and Letter No. 370/PEF-Dir/IV/2018 dated April 2, 2018, the rating of Bank Victoria Subordinated Bonds I Phase I Year 2017 is idBBB.

As of December 31, 2021 and 2020, the rating of the Bank Victoria Self Registration Bonds I Phase I Year 2017 based on Pefindo was idA-.

As of December 31, 2021 and 2020, the rating of the Bank Victoria Subordinated Bonds I Phase I Year 2017 based on Pefindo was idBBB.

The above bonds and subordinated bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

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**21. EFEK-EFEK YANG DITERBITKAN (lanjutan)**

Selaku Wali Amanat dari penerbitan obligasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2021 dan 2020.

**21. SECURITIES ISSUED (continued)**

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2021 and 2020.

**22. PERPAJAKAN**

**a. Utang pajak**

**22. TAXATION**

**a. Taxes payable**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
<b>Entitas Induk</b>			<b>Parent Company</b>
Pajak penghasilan badan			Corporate income tax
Pasal 25	-	-	Article 25
Pasal 29	-	-	Article 29
	-	-	
Pajak lainnya			Other taxes
Pasal 4 ayat 2	10.484.597	18.597.104	Article 4 (2)
Pasal 21	943.333	1.069.705	Article 21
Pasal 23	34.014	37.503	Article 23
Pajak Pertambahan Nilai	67.008	19.260	Value Added Tax
Pasal 26	38.400	37.282	Article 26
	11.567.352	19.760.854	
Jumlah utang pajak - Entitas Induk	<u>11.567.352</u>	<u>19.760.854</u>	Total taxes payable - Parent Company
<b>Entitas Anak</b>			<b>Subsidiary</b>
Pajak lainnya			Other taxes
Pasal 4 ayat 2	601.052	20.416	Article 4 (2)
Pasal 21	346.539	480.142	Article 21
Pasal 23	69.961	1.357.256	Article 23
	1.017.552	1.857.814	
Jumlah utang pajak - Entitas Anak	<u>1.017.552</u>	<u>1.857.814</u>	Total taxes payable - Subsidiary
<b>Konsolidasian</b>			<b>Consolidated</b>
Pajak penghasilan badan			Corporate income tax
Pasal 25	-	-	Article 25
Pasal 29	-	-	Article 29
	-	-	
Pajak lainnya			Other taxes
Pasal 4 ayat 2	11.085.649	18.617.520	Article 4 (2)
Pasal 21	1.289.872	1.549.847	Article 21
Pasal 23	103.975	1.394.759	Article 23
Pajak Pertambahan Nilai	67.008	19.260	Value Added Tax
Pasal 26	38.400	37.282	Article 26
	12.584.904	21.618.668	
Jumlah utang pajak - Konsolidasian	<u>12.584.904</u>	<u>21.618.668</u>	Total taxes payables - Consolidated

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**22. PERPAJAKAN (lanjutan)**

**22. TAXATION (continued)**

**b. Beban/(manfaat) Pajak Penghasilan**

**b. Deferred Tax Expense/(benefit)**

Manfaat pajak penghasilan terdiri dari:

Income tax benefit consist of:

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
<b>Entitas Induk</b>			<b>Parent Company</b>
Pajak kini	-	-	Current tax
Pajak tangguhan	(40.587.749)	(49.665.345)	Deferred tax
Jumlah	<u>(40.587.749)</u>	<u>(49.665.345)</u>	Total
<b>Entitas Anak</b>			<b>Subsidiary</b>
Pajak kini	-	-	Current tax
Pajak tangguhan	8.783.098	3.626.535	Deferred tax
Jumlah	<u>8.783.098</u>	<u>3.626.535</u>	Total
<b>Konsolidasian</b>			<b>Consolidated</b>
Pajak kini	-	-	Current tax
Pajak tangguhan	(31.804.651)	(46.038.810)	Deferred tax
Jumlah	<u>(31.804.651)</u>	<u>(46.038.810)</u>	Total

Rekonsiliasi antara rugi sebelum beban pajak penghasilan menurut laporan laba rugi konsolidasian dengan rugi kena pajak yang dihitung oleh Bank adalah sebagai berikut:

The reconciliation between loss before income tax as shown in the consolidated statement of profit or loss with taxable loss of the Bank is as follows:

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Laba (rugi) sebelum beban pajak penghasilan menurut laporan laba rugi konsolidasian	(150.868.148)	(298.232.500)	Profit (loss) before income tax expense per consolidated statement of profit or loss
Bagian laba bersih			Equity in net income of
Entitas Anak	12.253.870	3.239.053	Subsidiary
Eliminasi dan penyesuaian	(21.036.969)	(6.865.577)	Elimination and adjustments
Rugi sebelum pajak penghasilan - Entitas Induk (Bank)	(159.651.247)	(301.859.024)	Loss before income tax - Parent Company (Bank)
<b>Beda waktu:</b>			<b>Timing differences:</b>
Imbalan pasca kerja	(11.216.213)	(3.710.544)	Post-employment benefits
Cadangan bonus, jasa profesional dan promosi	(7.386.373)	(8.649.514)	Accrue bonuses, professional fees and promotion expenses
Beban penyisihan kerugian penurunan nilai aset keuangan dan non-keuangan	140.610.086	142.764.321	Provision for impairment losses on financial and non-financial assets
Kerugian yang belum direalisasi dari penyertaan saham yang diukur pada nilai wajar melalui laba rugi	51.306.877	-	Unrealised loss - on investment shares measured at fair value through profit or loss
<b>Beda tetap:</b>			<b>Permanent differences:</b>
Tunjangan karyawan	2.350.776	2.541.850	Employees' allowance
Biaya pemasaran	60.234	77.401	Marketing expenses
Representasi, jamuan dan biaya lainnya	-	291.888	Representative, entertainment and other expenses
Sumbangan	94.670	251.352	Donation

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**22. PERPAJAKAN (lanjutan)**

**b. Beban/(manfaat) Pajak Penghasilan (lanjutan)**

Rekonsiliasi antara rugi sebelum beban pajak penghasilan menurut laporan laba rugi konsolidasian dengan rugi kena pajak yang dihitung oleh Bank adalah sebagai berikut:

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
<b>Beda tetap:</b>		
Pendapatan dari reksadana yang dikenakan pajak final	(30.137.560)	(44.817.712)
Pendapatan operasional lainnya	984.740	24.190.192
(Rugi)/penghasilan kena pajak	<u>(12.984.010)</u>	<u>(188.919.790)</u>
Beban pajak penghasilan kini:	-	-
Bank	-	-
Entitas anak	-	-
Beban pajak kini - konsolidasian	-	-
Utang pajak kini:	-	-
Bank	-	-
Entitas anak	-	-
Entitas anak	<u>-</u>	<u>-</u>

Rekonsiliasi antara laba sebelum beban pajak pada laporan laba rugi dan penghasilan komprehensif lain konsolidasian dan perhitungan pajak penghasilan dan Manfaat Pajak untuk Bank Victoria dan entitas anak adalah sebagai berikut:

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
Rugi konsolidasian sebelum pajak penghasilan	(150.856.148)	(298.232.500)
Pajak dihitung dengan tarif pajak yang berlaku	(33.190.993)	(65.611.150)
Dampak pajak penghasilan pada:		
- Beban yang tidak dapat dikurangkan untuk tujuan pajak	(5.862.371)	(3.842.306)
- Entitas Anak	8.783.098	(113.408)
Dampak Rugi Fiskal	2.856.482	-
Penurunan penyisihan atas Aset pajak tangguhan	(4.390.867)	-
Dampak perubahan tarif pajak	-	21.528.054
<b>Manfaat pajak penghasilan - bersih</b>	<u><b>(31.804.651)</b></u>	<u><b>(48.038.810)</b></u>

**22. TAXATION (continued)**

**b. Deferred Tax Expense/(benefit) (continued)**

The reconciliation between loss before income tax as shown in the consolidated statement of profit or loss with taxable loss of the Bank is as follows:

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
<b>Permanent differences:</b>		
Income from mutual funds subject to final tax		
Other operating income		
Taxable (loss)/income		
Current tax expense		
Bank		
Subsidiary		
Current tax expense - consolidated		
Income tax payables:		
Bank		
Subsidiary		
Subsidiary		

The reconciliation between income before tax as shown in the consolidated statements of comprehensive income and income tax calculation and the related estimate of the current tax benefit for Bank Victoria and its Subsidiaries are as follows:

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
Consolidated loss before income tax		
Tax calculated at applicable tax rates		
Tax effects of:		
Expenses not deductible for tax purposes		
Subsidiary		
Tax losses		
Decrease in valuation of allowance for deferred tax		
Impact of changes in tax rates		
<b>Deferred tax benefit - net</b>		



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**22. PERPAJAKAN (lanjutan)**

**b. Beban/(manfaat) Pajak Penghasilan (lanjutan)**

Penghasilan kena pajak hasil rekonsiliasi di atas merupakan dasar dalam pengisian Surat Pemberitahuan (SPT) Tahunan PPh Badan Bank untuk tahun yang berakhir 31 Desember 2021. Perhitungan pajak penghasilan badan untuk tahun yang berakhir tanggal 31 Desember 2020 adalah sesuai dengan SPT Tahunan Bank.

Berdasarkan Pasal 5 ayat 2 dari Peraturan Pemerintah Pengganti Undang-Undang Republik Indonesia No. 1 tahun 2020 tentang Kebijakan Keuangan Negara Dan Stabilitas Sistem Keuangan Untuk Penanganan Pandemi Coronavirus Disease 2019 (COVID-19) Dan/Atau Dalam Rangka Menghadapi Ancaman Yang Membahayakan Perekonomian Nasional Dan/Atau Stabilitas Sistem Keuangan sebagaimana yang telah ditetapkan melalui Undang-Undang nomor 2 tahun 2020 tanggal 16 Mei 2020, Wajib Pajak dapat memperoleh penurunan tarif PPh sebesar 3% (tiga persen) lebih rendah dari tarif PPh Wajib Pajak Badan dalam negeri sebagaimana diatur dalam pasal 5 ayat 1 dari Peraturan Pemerintah Pengganti Undang-Undang Republik Indonesia No. 1 tahun 2020, dimana tarif pajak penghasilan badan dari sebelumnya sebesar 25% menjadi 22% untuk tahun fiskal 2020 dan 2021, serta menjadi 20% sejak tahun fiskal 2022.

Grup telah membukukan pengaruh dari perubahan tarif pajak penghasilan badan tersebut pada laporan keuangan konsolidasian untuk tahun yang berakhir 31 Desember 2020, berupa penurunan aset pajak tangguhan sebesar Rp19.802.074 dimana jumlah sebesar Rp21.528.054 dibebankan ke laba rugi periode berjalan dan sebesar Rp1.725.980 dikreditkan ke pendapatan komprehensif lainnya.

Pada tanggal 29 Oktober 2021, berdasarkan Undang-Undang No. 7 tahun 2021 tentang harmonisasi peraturan perpajakan, antara lain mengatur bahwa tarif pajak yang dikenakan atas penghasilan kena pajak bagi wajib pajak Badan dalam negeri dan bentuk usaha tetap adalah sebesar 22% yang berlaku pada tahun pajak 2022 dan seterusnya.

Tarif pajak yang baru tersebut digunakan sebagai acuan untuk pengukuran aset dan liabilitas pajak kini dan tangguhan mulai sejak berlakunya peraturan tersebut yaitu 29 Oktober 2021.

**22. TAXATION (continued)**

**b. Deferred Tax Expense/(benefit) (continued)**

*Taxable income results from above reconciliation are the basis in filing the Bank's annual Tax Return (SPT) of Corporate Income Tax for the year ended Desember 31, 2021. The calculations of income tax for the years ended December 31, 2020 conform to the Bank's Annual Tax Return.*

*Based on article 5 paragraph 2 of Government Regulation In lieu of the Law of the Republic of Indonesia No. 1 of 2020 regarding Government Financial Policy and Financial System Stability for Handling the Coronavirus Disease 2019 (COVID-19) Pandemic and/or in Terms of Facing Threats that Endangering the National Economy and/or Financial System Stability as stipulated by Law number 2 year 2020 dated 16 May 2020, Tax Payers can obtain a reduction on income tax rate of 3% (three percent) lower than the corporate income tax rate in country as is regulated in article 5 paragraph 1 of Government Regulation in Lieu of Law Republic of Indonesia No. 1 year 2020, which among others reduced the corporate income tax rate from 25% to 22% for fiscal years 2020 and 2021, and to 20% since fiscal year 2022.*

*The Group has recorded the effect of changes in the corporate income tax rate in the consolidated financial statements for the year ended December 31, 2020, in the form of a decrease in deferred tax assets by Rp19,802,074 in which the amount of Rp21,528,054 was charged to current year's profit and loss and Rp1,725,980 was credited to other comprehensive income.*

*On October 29, 2021, based on law No. 7 year 2021 harmonization of taxation regulation, among others regulates that income tax rate on corporate taxpayer and permanent establishment's corporate taxable income 22% which will be effective for fiscal year 2022 onwards.*

*The new tax rates are used as references to measure the current and deferred tax assets and liabilities starting from the enactment date of the new regulation on October 29, 2021.*

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**22. PERPAJAKAN (lanjutan)**

**22. TAXATION (continued)**

**c. Pajak tangguhan**

**c. Deferred tax**

	31 Desember/ December 31, 2021				
	1 Januari/ January	(Dibebankan)/ dikreditkan ke laporan laba rugi konsolidasian/ (Charged)/ Credited to consolidated profit or loss	(Dibebankan)/ dikreditkan ke pendapatan komprehensif lain konsolidasian/ (Charged)/ Credited to consolidated other comprehensive income	31 Desember/ December	
Entitas Induk					Parent Company
Cadangan bonus, jasa profesional dan promosi	3.057.223	(2.077.660)	(427.394)	552.169	Accrued bonuses, professional fee and promotion
Cadangan kerugian penurunan nilai	185.318.812	30.988.982	-	216.307.793	Allowances for impairment losses
Imbalan pasca kerja	11.686.799	(2.467.567)	-	9.219.232	Post-employment benefits
Kerugian yang belum direalisasi atas perubahan nilai wajar penyertaan saham yang diukur pada diukur pada FVTPL	18.203.300	11.287.513	-	29.490.813	Unrealised losses on changes in fair value of investment in shares measured at FVTPL
Keuntungan/(kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada FVOCI	(19.995.192)	-	14.920.624	(5.074.568)	Unrealised gains/(losses) on changes in fair value of securities measured at FVOCI
Rugi pajak yang bisa dikompensasi	41.562.364	2.856.482	-	44.418.846	Tax loss carry forward
Aset/(liabilitas) pajak tangguhan Bank - bersih	239.833.306	40.587.749	14.493.230	294.914.285	Deferred tax asset/(liability) Bank - net
Aset/(liabilitas) pajak tangguhan Entitas Anak - bersih	10.655.395	(8.783.098)	5.602.019	7.474.317	Deferred tax asset/(liability) Subsidiary - net
Jumlah aset pajak tangguhan konsolidasian - bersih	250.488.701	31.804.651	20.095.250	302.388.602	Total consolidated deferred tax assets - net

	31 Desember/ December 31, 2020						
	1 Januari/ January	(Dibebankan)/ dikreditkan ke laporan laba rugi konsolidasian/ (Charged)/ Credited to consolidated profit or loss	(Dibebankan)/ dikreditkan ke pendapatan komprehensif lain konsolidasian/ (Charged)/ Credited to consolidated other comprehensive income	Dampak penerapan PSAK 71/ Impact on the implementation of SFAS 71	Dampak penurunan tarif pajak/ Impact of changes in tax rate	31 Desember/ December	
Entitas Induk							Parent Company
Cadangan bonus, jasa profesional dan promosi	5.629.255	(1.867.204)	-	-	(704.828)	3.057.223	Accrued bonuses, professional fee and promotion
Cadangan kerugian penurunan nilai	112.654.401	29.471.934	-	56.681.688	(13.489.211)	185.318.812	Allowances for impairment losses
Imbalan pasca kerja	14.548.135	(816.320)	(299.240)	-	(1.745.776)	11.686.799	Post-employment benefits
Kerugian yang belum direalisasi atas perubahan nilai wajar penyertaan saham yang diukur pada diukur pada FVTPL	20.685.568	-	-	-	(2.482.268)	18.203.300	Unrealised losses on changes in fair value of investment in shares measured at FVTPL
Keuntungan/(kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada FVOCI	(11.198.589)	-	(10.140.434)	-	1.343.831	(19.995.192)	Unrealised gains/(losses) on changes in fair value of securities measured at FVOCI
Rugi pajak yang bisa dikompensasi	-	41.562.364	-	-	-	41.562.364	Tax loss carry forward
Aset/(liabilitas) pajak tangguhan Bank - bersih	142.318.770	68.350.774	(10.439.674)	56.681.688	(17.078.252)	239.833.306	Deferred tax asset/(liability) Bank - net
Aset/(liabilitas) pajak tangguhan Entitas Anak - bersih	19.978.978	(783.910)	(5.815.851)	-	(2.723.822)	10.655.395	Deferred tax asset/(liability) Subsidiary - net
Jumlah aset pajak tangguhan konsolidasian - bersih	162.297.748	67.566.864	(16.255.525)	56.681.688	(19.802.074)	250.488.701	Total consolidated deferred tax assets - net

Manajemen berpendapat bahwa aset pajak tangguhan yang timbul dari perbedaan temporer kemungkinan besar dapat direalisasi pada tahun-tahun mendatang.

Management believes that total deferred tax assets arising from temporary differences are probable to be realised in the future years.

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**22. PERPAJAKAN (lanjutan)**

**d. Sengketa pajak**

**Tahun pajak 2016**

Pada tanggal 20 Desember 2019, Bank menerima Surat Ketetapan Pajak ("SKP") untuk tahun fiskal 2016. Berdasarkan SKP tersebut, Kantor Pajak menetapkan kurang bayar atas Pajak Penghasilan Pasal 21 ("PPh Pasal 21"), Pajak Penghasilan Pasal 23 ("PPh Pasal 23"), Pajak Penghasilan Pasal 4 Ayat 2 ("PPh Pasal 4 Ayat 2"), Pajak Pertambahan Nilai ("PPN"), Pajak Penghasilan, beserta sanksi administrasi sebesar total Rp8.916.066. SKP tersebut telah disetujui oleh Bank, kecuali sanksi administrasi sebesar Rp2.891.697 yang telah diajukan permohonan keringanan sanksi administrasi kepada Kantor Pajak pada tanggal 17 Januari 2020. Pada tanggal 28 April 2020 Kantor Pajak telah menyetujui permohonan permintaan keringanan sanksi administrasi yang diajukan oleh Bank.

SKP yang telah disetujui oleh Manajemen Bank masing-masing sebesar Rp10.000 untuk PPh Pasal 21, Rp101.209 untuk PPh Pasal 23, Rp499.968 untuk PPh Pasal 4 Ayat 2, Rp650.384 untuk PPN, dan Rp4.762.808 untuk Pajak Penghasilan Badan telah dibayar dan dibebankan ke laporan laba rugi konsolidasian tahun 2019.

**22. TAXATION (continued)**

**d. Tax disputes**

**Fiscal year 2016**

On December 20, 2019, the Bank received Tax Assessment Letters for the fiscal year 2016. Based on the Tax Assessment Letters, the Tax Office confirmed the underpayment of Income Tax Article 21, Withholding Tax articles 23, Income Tax Article 4(2), Value Added Tax ("VAT"), Corporate Income Tax, and administrative sanctions with a total of Rp8,916,066. The Tax Assessment Letters have been agreed by the Bank's Management, except for the administrative sanctions of Rp2,891,697 which had been submitted for the request of administrative sanctions relief to the Tax Office on 17 January 2020. On April 28, 2020 Tax Office has approved the relief of administrative sanctions which submitted by the Bank.

The tax assessment Letters which have been agreed by the Bank's Management of Rp10,000 for Income Tax Article 21, Rp101,209 for Withholding Tax Articles 23, Rp499,968 for Income Tax Article 4(2), Rp650,384 for VAT, and Rp4,762,808 for Corporate Income Tax have been paid and were charged on 2019 consolidated statement of profit or loss.

**23. AKRUAL DAN LIABILITAS LAIN-LAIN**

**23. ACCRUALS AND OTHER LIABILITIES**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Bunga dan bagi hasil yang masih harus dibayar	59.466.938	97.673.410	<i>Interest and profit sharing payable</i>
Liabilitas sewa	15.631.796	25.728.104	<i>Lease liabilities</i>
Kewajiban Transaksi ATM, Internet Banking dan Mobile Banking	11.002.143	14.124.709	<i>ATM Transaction, Internet Banking and Mobile Banking liabilities</i>
Beban akrual	10.327.022	17.103.447	<i>Accrued expenses</i>
Cadangan THR	5.801.747	5.375.637	<i>THR reserves</i>
Pendapatan diterima dimuka	12.926	16.192	<i>Unearned revenues</i>
Hutang kepada supplier	12.927.781	11.995.505	<i>payable to third parties</i>
Lain-lain	9.685.135	7.200.195	<i>Others</i>
<b>Jumlah</b>	<b>124.855.488</b>	<b>179.217.199</b>	<b>Total</b>

Beban akrual terutama terdiri dari biaya administrasi kredit, biaya personalia, biaya asuransi jiwa dan kebakaran.

Saldo lain-lain pada tanggal 31 Desember 2021 dan 2020 terutama terdiri dari hutang kepada pihak ketiga dan cadangan biaya promosi hadiah.

Accrued expenses consist of credit administration expense, personnel expense, life and fire insurance expenses.

The balance of others as of December 31, 2021 and 2020 mainly consist of liabilities to third parties and accrued expense for promotion gift.

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**24. LIABILITAS IMBALAN KERJA KARYAWAN**

**24. EMPLOYEE BENEFITS OBLIGATION**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Liabilitas imbalan pasca kerja	43.884.161	58.499.231	<i>Post-employment benefits liability</i>
<b>Jumlah</b>	<b>43.884.161</b>	<b>58.499.231</b>	<b>Total</b>

**Imbalan kerja jangka panjang**

Informasi di bawah ini mengikhtisarkan komponen beban imbalan pasca kerja karyawan Grup yang diakui di laporan laba rugi dan penghasilan komprehensif lain konsolidasian dan liabilitas imbalan pasca kerja karyawan Grup yang diakui di laporan posisi keuangan konsolidasian berdasarkan laporan aktuaris PT Ricky Leonard Jasatama aktuaris independen untuk Bank, tertanggal 23 Maret 2022 (2020: 20 Januari 2021) dan berdasarkan laporan aktuaris PT Ricky Leonard Jasatama dan Dafras Ahmad Bustami, aktuaris independen untuk Entitas Anak, tertanggal 24 Januari 2022 (2020: 21 Januari 2021).

**Long term employee benefit**

The following informations summarise the components of post-employment benefits expense of the Group recognised in the consolidated profit or loss and other comprehensive income and post-employment benefits liability of Group recognised in the consolidated statement of financial position, based on actuarial report of PT Ricky Leonard Jasatama, an independent actuary for the Bank, dated March 23, 2022 (2020: January 20, 2021) and based on actuarial report of PT Ricky Leonard Jasatama and Dafras Ahmad Bustami, an independent actuary for the Subsidiary, dated January 24, 2022 (2020: January 21, 2021).

**a. Beban imbalan pasca kerja**

**a. Post-employment benefits expenses**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Biaya jasa kini	4.758.943	6.917.806	<i>Current service cost</i>
Biaya jasa lalu	(9.800.025)	-	<i>Past service cost</i>
Biaya bunga	2.542.537	3.268.419	<i>Interest cost</i>
Biaya pesangon pemutusan hubungan kerja	2.073.297	159.081	<i>Severance payment</i>
<b>Jumlah</b>	<b>(425.248)</b>	<b>10.345.306</b>	<b>Total</b>

**b. Liabilitas imbalan pasca kerja**

**b. Post-employment benefits liability**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Nilai kini kewajiban imbalan pasti	43.884.161	58.499.231	<i>Present value of defined benefit obligations</i>

Mutasi nilai kini kewajiban adalah sebagai berikut:

The movement in the present value of obligation are as follow:

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Pada awal tahun	58.499.229	63.116.706	<i>At the beginning of the period</i>
Biaya jasa kini	4.758.943	6.917.806	<i>Current service cost</i>
Biaya jasa lalu	(9.800.025)	-	<i>Past service cost</i>
Imbalan yang dibayar	(10.273.616)	(14.592.096)	<i>Benefits paid</i>
Beban bunga	2.542.537	3.268.419	<i>Interest cost</i>
Keuntungan aktuarial	(1.842.907)	(211.604)	<i>Actuarial gains</i>
<b>Pada akhir tahun</b>	<b>43.884.161</b>	<b>58.499.231</b>	<b>At the end of the year</b>

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**24. LIABILITAS IMBALAN KERJA KARYAWAN  
(lanjutan)**

**Imbalan kerja jangka panjang (lanjutan)**

**b. Liabilitas imbalan pasca kerja (lanjutan)**

Asumsi-asumsi utama yang digunakan dalam menghitung liabilitas imbalan pasca kerja pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

**24. EMPLOYEE BENEFITS OBLIGATION (continued)**

**Long term employee benefit (continued)**

**b. Post-employment benefits liability  
(continued)**

The principal assumptions used to determine the post-employment benefits liability as of December 31, 2021 and 2020 are as follows:

	<b>31 Desember/ December 31,</b>		
	<b>2021</b>	<b>2020</b>	
<b><u>Bank</u></b>			<b><u>Bank</u></b>
Usia pensiun normal	55 tahun/years	55 tahun/years	Normal retirement age
Tingkat mortalita	TM IV	TM III	Mortality rate
Tingkat cacat	5,00% dari tingkat mortalita/ of mortality rate	5,00% dari tingkat mortalita/ of mortality rate	Disability rate
Tingkat pengunduran diri	5,00% per tahun/ per annum	5,00% per tahun/ per annum	Resignation rate
Tingkat kenaikan gaji	6,52% per tahun/ per annum	6,52% per tahun/ per annum	Salary increase rate
Tingkat suku bunga	6,98% per tahun/ per annum	6,74% per tahun/ per annum	Interest rate
<b><u>Entitas Anak</u></b>			<b><u>Subsidiary</u></b>
Usia pensiun normal	55 tahun/years	55 tahun/years	Normal retirement age
Tingkat mortalita	TM IV	TM III	Mortality rate
Tingkat cacat	5,00% dari tingkat mortalita/ of mortality rate	5,00% dari tingkat mortalita/ of mortality rate	Disability rate
Tingkat pengunduran diri	5,00% per tahun/ per annum	5,00% per tahun/ per annum	Resignation rate
Tingkat kenaikan gaji	6,00% per tahun/ per annum	6,00% per tahun/ per annum	Salary increase rate
Tingkat suku bunga	7,08% per tahun/ per annum	7,02% per tahun/ per annum	Interest rate

Grup terekspos dengan beberapa risiko melalui program imbalan pasti, dengan risiko paling signifikan pada tingkat diskonto obligasi dan kenaikan gaji.

Tabel di bawah menunjukkan sensitivitas atas kemungkinan perubahan tingkat kenaikan gaji dan tingkat diskonto terhadap kewajiban imbalan pasca kerja Bank:

The Group is exposed to a number of risks through its defined benefit pension plan, with the most significant risk on bond's discount rates and salary increase.

The following table represent the sensitivity analysis of a reasonably possible change in salary increase and discount rate of obligation to Bank's post-employment benefit liability:

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**24. LIABILITAS IMBALAN KERJA KARYAWAN  
(lanjutan)**

**Imbalan kerja jangka panjang (lanjutan)**

**b. Liabilitas imbalan pasca kerja (lanjutan)**

	<b>31 Desember/ December 31, 2021</b>		
	<b>Peningkatan/ Increase by 100 bps</b>	<b>Penurunan/ Decrease by 100 bps</b>	
Tingkat diskonto	(2.927.394)	3.495.590	Discount rates
Kenaikan gaji	3.305.660	(2.114.126)	Salary increases
	<b>31 Desember/ December 31, 2020</b>		
	<b>Peningkatan/ Increase by 100 bps</b>	<b>Penurunan/ Decrease by 100 bps</b>	
Tingkat diskonto	(8.614.068)	10.158.459	Discount rates
Kenaikan gaji	10.125.611	(8.654.129)	Salary increases

Analisis sensitivitas (tidak diaudit) di atas didasarkan pada perubahan atas asumsi tunggal dengan asumsi lainnya konstan. Pada praktiknya, kecil kemungkinan hal tersebut terjadi, dan perubahan-perubahan dalam beberapa dalam beberapa asumsi mungkin saling berhubungan. Ketika melakukan perhitungan sensitivitas dari kewajiban imbalan pasti ke asumsi aktuarial yang signifikan, metode yang sama (nilai kini dari kewajiban imbalan pasti yang dihitung menggunakan *projected unit credit* pada akhir periode pelaporan) telah diterapkan seperti saat menghitung kewajiban pensiun yang diakui pada laporan posisi keuangan.

Harapan umur hidup

Sebagian besar dari kewajiban program menyediakan manfaat seumur hidup, sehingga kenaikan umur hidup akan mengakibatkan kenaikan liabilitas program.

Pada 31 Desember 2021 dan 2020, durasi rata-rata tertimbang dari liabilitas imbalan pasti adalah 16,89 dan 17,72 tahun (tidak diaudit).

**24. EMPLOYEE BENEFITS OBLIGATION (continued)**

**Long term employee benefit (continued)**

**b. Post-employment benefits liability (continued)**

The above sensitivity analysis (unaudited) are based on a change in an assumption while holding all other assumption constant. In practice, this is unlikely to occur, and the changes in some of the assumption may be correlated. When calculation the sensitivity of the defined benefit obligation to significant actuarial assumptions, the same method (present value if the defined benefit obligation calculation with the projected unit credit method at the end of the reporting period) has been applied as when calculating the pension liability recognised within the statement of financial position.

Life expectancy

The majority of the plans' obligations are to provide benefits for the life of the member, so increases in life expectancy will result in an increase in plans' liabilities.

In December 31, 2021 and 2020, the weighted average duration of the defined benefit obligation are 16.89 and 17.72 years (unaudited).

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**24. LIABILITAS IMBALAN KERJA KARYAWAN  
(lanjutan)**

**Imbalan kerja jangka panjang (lanjutan)**

**b. Liabilitas imbalan pasca kerja (lanjutan)**

Harapan umur hidup (lanjutan)

Analisis jatuh tempo yang diharapkan dari manfaat pensiun adalah sebagai berikut (tidak diaudit):

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Kurang dari 1 tahun	4.316.017	1.572.061	Less than 1 year
2 - 5 tahun	16.256.024	22.719.468	2 - 5 years
5 - 10 tahun	13.561.286	18.408.856	5 - 10 years
Lebih dari 10 tahun	9.750.834	15.798.846	Over 10 years
<b>Jumlah</b>	<b>43.884.161</b>	<b>58.499.231</b>	<b>Total</b>

**24. EMPLOYEE BENEFITS OBLIGATION (continued)**

**Long term employee benefit (continued)**

**b. Post-employment benefits liability (continued)**

Life expectancy (continued)

Expected maturity analysis of employee benefits are as follows (unaudited):

**25. DANA SYIRKAH TEMPORER**

Dana *Syirkah* temporer terdiri dari:

a. Simpanan nasabah

(i) Giro *Mudharabah*

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Pihak berelasi	8.957	8.957	Related parties
Pihak ketiga	-	5.217	Third parties
<b>Jumlah</b>	<b>8.957</b>	<b>14.174</b>	<b>Total</b>

(ii) Tabungan *Mudharabah*

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Pihak berelasi	208.952	267.937	Related parties
Pihak ketiga	20.041.817	40.946.464	Third parties
<b>Jumlah</b>	<b>20.250.769</b>	<b>41.214.401</b>	<b>Total</b>

Tingkat bagi hasil rata-rata per tahun untuk tabungan *mudharabah* selama 31 Desember 2021 dan 2020 adalah sebesar 0,50% - 4,00% dan 0,50% - 5,00%.

Average annual profit sharing for *mudharabah* saving during December 31, 2021 and 2020 are 0.50% - 4.00% and 0.50% - 5.00%.

(iii) Deposito *Mudharabah*

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Pihak berelasi	3.075.000	2.655.000	Related parties
Pihak ketiga	1.198.657.586	1.280.798.786	Third parties
<b>Jumlah</b>	<b>1.201.732.586</b>	<b>1.283.453.786</b>	<b>Total</b>

**25. TEMPORARY SYIRKAH FUNDS**

Temporary *Syirkah* funds consist of:

a. Deposits from customers

(i) *Mudharabah* demand deposits

(ii) *Mudharabah* saving deposits

(iii) *Mudharabah* deposits



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**25. DANA SYIRKAH TEMPORER (lanjutan)**

b. Simpanan dari bank lain

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
Deposito berjangka – pihak ketiga	<u>8.500.000</u>	<u>54.500.000</u>

*Time deposit – third parties*

Berikut ini adalah informasi penting lainnya sehubungan dengan deposito dari simpanan nasabah dan simpanan dari bank lain:

(i) Berdasarkan periode

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
1 bulan	614.089.901	452.575.692
3 bulan	293.643.537	466.524.182
6 bulan	57.394.348	217.858.912
12 bulan	<u>245.104.800</u>	<u>200.995.000</u>
<b>Jumlah</b>	<b><u>1.210.232.586</u></b>	<b><u>1.337.953.786</u></b>

*1 month  
3 months  
6 months  
12 months*

**Total**

(ii) Berdasarkan sisa waktu hingga jatuh tempo

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
Kurang dari 1 bulan	631.716.154	296.595.352
1 sampai dengan 3 bulan	315.938.752	695.710.434
3 sampai dengan 6 bulan	22.923.880	152.343.000
6 sampai dengan 12 bulan	<u>239.653.800</u>	<u>193.305.000</u>
<b>Jumlah</b>	<b><u>1.210.232.586</u></b>	<b><u>1.337.953.786</u></b>

*Less than 1 month  
1 up to 3 months  
3 up to 6 months  
6 up to 12 months*

**Total**

Deposito berjangka *Mudharabah* merupakan simpanan dana pihak lain yang mendapatkan imbalan bagi hasil dari pendapatan Entitas Anak atas penggunaan dana tersebut dengan *nisbah* yang ditetapkan dan disetujui sebelumnya dengan akad *Mudharabah Muthlaqah*.

Deposito berjangka *Mudharabah* dengan akad *Mudharabah Muthlaqah* yang dijadikan sebagai jaminan atas piutang dan pembiayaan adalah masing-masing berjumlah Rp237.600.000 dan Rp273.135.000 pada tanggal 31 Desember 2021 dan 2020 (Catatan 11).

Tingkat bagi hasil rata-rata per tahun untuk deposito *mudharabah* selama periode 31 Desember 2021 dan 2020 masing-masing sebesar 1,25% - 3,50% dan 2,75% - 6,00%.

**25. TEMPORARY SYIRKAH FUNDS (continued)**

b. Deposits from other banks

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
Deposits from other banks	<u>8.500.000</u>	<u>54.500.000</u>

*Time deposit – third parties*

Other significant information related to the time deposits for deposits from customers and deposits from other banks:

(i) By period

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
1 month	614.089.901	452.575.692
3 months	293.643.537	466.524.182
6 months	57.394.348	217.858.912
12 months	<u>245.104.800</u>	<u>200.995.000</u>
<b>Total</b>	<b><u>1.210.232.586</u></b>	<b><u>1.337.953.786</u></b>

*1 month  
3 months  
6 months  
12 months*

**Total**

(ii) By remaining period until maturity

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
Less than 1 month	631.716.154	296.595.352
1 up to 3 months	315.938.752	695.710.434
3 up to 6 months	22.923.880	152.343.000
6 up to 12 months	<u>239.653.800</u>	<u>193.305.000</u>
<b>Total</b>	<b><u>1.210.232.586</u></b>	<b><u>1.337.953.786</u></b>

*Less than 1 month  
1 up to 3 months  
3 up to 6 months  
6 up to 12 months*

**Total**

*Mudharabah* time deposits represent third parties' deposits which received a profit sharing return from the Subsidiary's income over utilisation of its fund based on an agreed profit sharing ratio arranged in *Mudharabah Muthlaqah*.

*Mudharabah* time deposits with *Mudharabah Muthlaqah* agreement that is pledged as collateral for receivables and financing is amounted to Rp237,600,000 and Rp273,135,000 as of December 31, 2021 and 2020, respectively (Note 11).

Average annual profit sharing for *mudharabah* deposits during period December 31, 2021 and 2020 are 1.25% - 3.50% and 2.75% - 6.00%, respectively.

The original consolidated financial statements included herein are in Indonesian language.

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**26. MODAL SAHAM**

Susunan pemegang saham Bank masing-masing pada tanggal 31 Desember 2021 dan 2020 berdasarkan laporan dari Biro Administrasi Efek PT Adimitra Jasa Korpora adalah sebagai berikut:

**26. SHARE CAPITAL**

The Bank's shareholders as of December 31, 2021 and 2020 based on the report of PT Adimitra Jasa Korpora, the Shares Registration Bureau, are as follows:

<b>31 Desember/ December 31, 2021</b>				
<b>Pemegang Saham</b>	<b>Jumlah saham ditempatkan dan disetor penuh/ Number of shares issued and fully paid</b>	<b>Persentase kepemilikan/ Percentage of ownership</b>	<b>Jumlah modal yang disetor/ Total capital (Rp)</b>	<b>Shareholders</b>
PT Victoria Investama Tbk	4.128.870.132	39,37	412.887.013	PT Victoria Investama Tbk
Suzanna Tanojo	1.538.152.114	14,67	153.815.211	Suzanna Tanojo
DEG-Deutsche Investitions - Und Entwicklungsgesellschaft MbH	780.394.335	7,44	78.039.434	DEG-Deutsche Investitions - Und Entwicklungsgesellschaft MbH
PT Nata Patindo	395.484.865	3,77	39.548.487	PT Nata Patindo
Masyarakat (masing-masing di bawah 5%)	<u>3.644.231.122</u>	<u>34,75</u>	<u>364.423.112</u>	Public (individually less than 5%)
<b>Jumlah</b>	<b><u>10.487.132.568</u></b>	<b><u>100,00</u></b>	<b><u>1.048.713.257</u></b>	<b>Total</b>
<b>31 Desember/ December 31, 2020</b>				
<b>Pemegang Saham</b>	<b>Jumlah saham ditempatkan dan disetor penuh/ Number of shares issued and fully paid</b>	<b>Persentase kepemilikan/ Percentage of ownership</b>	<b>Jumlah modal yang disetor/ Total capital (Rp)</b>	<b>Shareholders</b>
PT Victoria Investama Tbk	4.094.737.242	45,74	409.473.724	PT Victoria Investama Tbk
Suzanna Tanojo	1.538.152.114	17,18	153.815.211	Suzanna Tanojo
DEG-Deutsche Investitions - Und Entwicklungsgesellschaft MbH	780.394.335	8,72	78.039.434	DEG-Deutsche Investitions - Und Entwicklungsgesellschaft MbH
PT Nata Patindo	395.484.865	4,42	39.548.487	PT Nata Patindo
Masyarakat (masing-masing di bawah 5%)	<u>2.143.178.483</u>	<u>23,94</u>	<u>214.317.848</u>	Public (individually less than 5%)
<b>Jumlah</b>	<b><u>8.951.947.039</u></b>	<b><u>100,00</u></b>	<b><u>895.194.704</u></b>	<b>Total</b>

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**26. MODAL SAHAM (lanjutan)**

Mutasi jumlah saham yang ditempatkan dan disetor penuh adalah sebagai berikut:

	<b>Persentase kepemilikan/ Percentage of ownership</b>
Saldo 1 Januari 2021	8.951.947.039
Penambahan modal saham dari penerbitan saham tanpa hak memesan efek terlebih dahulu	<u>1.535.185.529</u>
Saldo 31 Desember 2021	<b><u>10.487.132.568</u></b>

Berdasarkan hasil Rapat Umum Pemegang Saham Tahunan tanggal 10 Mei 2019 yang telah dituangkan dalam Akta Notaris No. 19 tanggal 10 Mei 2019, pemegang saham menyetujui rencana Peningkatan Modal Tanpa Hak Memesan Efek Terlebih Dahulu dengan jumlah sebanyak-banyaknya 10% dari modal ditempatkan dan disetor penuh dalam Bank.

Pada tanggal 6 Mei 2021, Bank telah melakukan penerbitan saham atas Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Tahap Kedua Tahun 2021 sebanyak 586.205.939 (lima ratus delapan puluh enam juta dua ratus lima ribu sembilan ratus tiga puluh sembilan) lembar saham dengan harga pelaksanaan sebesar Rp160 (seratus enam puluh Rupiah) per saham atau seluruhnya sejumlah Rp93.792.950 (sembilan puluh tiga miliar tujuh ratus sembilan puluh dua juta sembilan ratus lima puluh ribu Rupiah) yang telah masuk ke dalam rekening Bank pada tanggal 6 Mei 2021.

Peningkatan modal disetor ini telah dituangkan dalam Akta Notaris No. 57 tanggal 25 Juni 2021 dan telah diterima dan dicatat di dalam Sistem Administrasi Badan Hukum Kementerian Hukum dan HAM berdasarkan surat No. AHU-AH.01.03-0428098 tanggal 14 Juli 2021.

Pada tanggal 10 Desember 2021, Bank melakukan penerbitan saham atas Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu sebanyak 948.979.590 lembar saham dengan harga pelaksanaan sebesar Rp196 (seratus Sembilan puluh enam Rupiah) per saham atau seluruhnya sejumlah Rp185.999.999 (seratus delapan puluh lima miliar sembilan ratus sembilan puluh sembilan juta sembilan ratus sembilan puluh sembilan ribu rupiah) yang telah masuk dalam rekening bank pada tanggal 10 Desember 2021.

**26. SHARE CAPITAL (continued)**

The movement in the number of shares issued and fully paid are as follows:

Balance as of January 1, 2021
Additional of new shares from exercise of additional new shares without preemptive rights
Balance as of December 31, 2021

Based on Extraordinary General Meeting of Shareholders on May 10, 2019 which has been legalised through Notarial Deed No. 19 dated May 10, 2019, the shareholders agreed to increase paid up capital from Additional New Shares Without Preemptive Rights with maximum amount 10% of Bank's issued capital.

On May 6, 2021, the Bank has issued 586,205,939 (five hundred eighty-six million two hundred five thousand nine hundred and thirty-nine) private placement of shares with an exercise price of to Rp160 (one hundred and sixty Rupiah) per share or a total of Rp93,792,950 (ninety three billion seven hundred ninety two million nine hundred fifty thousand rupiah) which has been entered into the Bank's account on May 6, 2021.

The increase in paid-up capital has been legalised through Notarial Deed No. 57 dated June 25, 2021 and has been reported and accepted by Ministry of Law and Human Rights of the Republic of Indonesia through its letter No. AHU-AH.01.03-0428098 dated July 14, 2021.

On December 10, 2021, the Bank has issued 948,979,590 (nine hundred forty-eight million nine hundred seventy-nine thousand five hundred and ninety) private placement of shares with an exercise price of to Rp196 (one hundred ninety-six Rupiah) per share or a total of Rp185,999,999 (one hundred eighty five billion nine hundred ninety nine million nine hundred ninety nine thousand Rupiah) which has been entered into the Bank account on December 10, 2021.

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**26. MODAL SAHAM (lanjutan)**

Peningkatan modal disetor ini telah dituangkan dalam Akta Notaris No. 19 tanggal 20 Desember 2021 dan telah diterima dan dicatat di dalam Sistem Administrasi Badan Hukum Kementerian Hukum dan HAM berdasarkan surat No. AHU-AH.01.03-0488770 tanggal 21 Desember 2021. Sehingga jumlah saham yang ditempatkan dan disetor penuh pada 31 Desember 2021 adalah 10.487.132.568 saham.

**27. TAMBAHAN MODAL DISETOR DAN SETORAN MODAL DITERIMA DIMUKA**

Pada tanggal 10 Desember 2021, Bank menerima tambahan dana setoran modal diterima dimuka sebesar Rp278.000.000 dari PT Victoria Investama Tbk selaku pemegang saham dalam rangka pemenuhan POJK No 11/POJK.03/2016 tentang Kewajiban Modal Minimum Bank Umum tanggal 29 Januari 2016.

Sisa tambahan modal disetor merupakan selisih antara jumlah yang diterima dari penerbitan saham dengan nilai nominal yang dicatat sebagai setoran modal.

**28. PENGGUNAAN RUGI BERSIH TAHUN 2020 DAN 2019**

Penggunaan Rugi Bersih Tahun 2020

Berdasarkan Berita Acara Rapat Umum Pemegang Saham (RUPS) Tahunan tanggal 25 Juni 2021 yang dinyatakan dalam Akta Notaris Fathiah Helmi, S.H. tanggal yang sama, Bank tidak membukukan laba untuk periode tahun 2020 sehingga Bank tidak melakukan pembagian dividen untuk para pemegang saham.

Penggunaan Rugi Bersih Neto Tahun 2019

Penggunaan Rugi Neto Tahun 2019 Berdasarkan Berita Acara Rapat Umum Pemegang Saham (RUPS) Tahunan tanggal 19 Juni 2020 yang dinyatakan dalam Akta Notaris Fathiah Helmi, S.H. tanggal yang sama, Bank tidak membukukan laba untuk periode tahun 2019 sehingga Bank tidak melakukan pembagian dividen untuk para pemegang saham.

**26. SHARE CAPITAL (continued)**

The increase in paid-up capital has been legalised through Notarial Deed No. 19 dated December 20, 2021 and has been reported and accepted by Ministry of Law and Human Rights of the Republic of Indonesia through its letter No. AHU-AH.01.03-0488770 dated December 21, 2021. Therefore, the issued and fully paid capital as of December 31, 2021 is 10,487,132,568 shares.

**27. ADDITIONAL PAID-IN CAPITAL AND CAPITAL RECEIVED IN ADVANCE**

On December 10, 2021, the Bank received fund of capital received in advance amounted to Rp278.000.000 from PT Victoria Investama Tbk, the shareholder in order to fulfill the requirement of POJK No.11/POJK.03/2016 regarding Liability for Fulfillment of Minimum Capital of Commercial Bank dated 29 January 2016.

The additional paid-in capital represent the excess of proceeds from issuance of shares with the par value recorded as paid-in capital.

**28. APPROPRIATION OF 2020 AND 2019 NET LOSS**

Appropriation of 2020 Net Loss

Based on the Annual General Meeting of Shareholders dated June 25, 2021, as stated on notarial deeds of Fathiah Helmi, S.H. on the same date, Bank did not record net income for the year 2020 thus Bank did not distribute any dividend to shareholders.

Appropriation of 2019 Net Loss

Shareholders dated June 19, 2020, as stated on notarial deeds of Fathiah Helmi, S.H. on the same date, Bank did not record net income for the year 2019 thus Bank did not distribute any dividend to shareholders.

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**29. CADANGAN UMUM**

Pada tanggal 31 Desember 2021 dan 2020, Bank telah membentuk cadangan umum dan wajib sebesar Rp186.356.165. Cadangan umum dan wajib ini dibentuk sehubungan dengan Undang-Undang Republik Indonesia No. 1/1995 yang telah digantikan dengan Undang-Undang No. 40/2007 efektif tanggal 16 Agustus 2007 mengenai Perseroan Terbatas, yang mengharuskan perusahaan-perusahaan untuk membuat penyisihan cadangan umum sebesar sekurang-kurangnya 20% dari jumlah modal yang ditempatkan dan disetor penuh. Undang-Undang tersebut tidak mengatur jangka waktu untuk membentuk cadangan tersebut.

**29. GENERAL RESERVES**

As of December 31, 2021 and 2020, Bank has set up a cumulative general and legal reserves of Rp186,356,165. These general and legal reserve were provided in relation with the Law of the Republic of Indonesia No. 1/1995 which has been replaced with the Law No. 40/2007 effective on August 16, 2007 regarding the Limited Liability Company which requires the companies to set up a general reserve amounting to at least 20% of the issued and paid-up share capital. There is no timeline over which this amount should be provided.

**30. PENDAPATAN BUNGA DAN SYARIAH**

**30. INTEREST AND SHARIA INCOME**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
<b>Pendapatan bunga</b>			<b>Interest income</b>
Pinjaman yang diberikan	1.226.163.233	1.350.171.071	Loans
Efek-efek	251.622.856	275.588.473	Marketable securities
Surat-surat berharga yang dibeli dengan janji dijual kembali	10.335.095	6.244.036	Securities purchased under agreement to resell
Penempatan pada Bank Indonesia dan bank lain	<u>10.270.458</u>	<u>9.886.638</u>	Placements with Bank Indonesia and other banks
Subtotal	<u>1.498.391.642</u>	<u>1.641.890.218</u>	Subtotal
<b>Pendapatan syariah</b>			<b>Sharia income</b>
Pendapatan bagi hasil	40.938.499	77.112.912	Profit sharing
Pendapatan margin	20.378.070	18.470.603	Margin income
Pendapatan <i>ijarah</i> - bersih	116.635	231.551	Net income from <i>ijarah</i>
Pendapatan usaha utama lainnya	<u>52.385.155</u>	<u>52.935.111</u>	Income from other main operational
Subtotal	<u>113.818.359</u>	<u>148.750.177</u>	Subtotal
<b>Jumlah</b>	<u><b>1.612.210.001</b></u>	<u><b>1.790.640.395</b></u>	<b>Total</b>

Jumlah pendapatan bunga dan syariah dari pihak berelasi untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020 masing-masing adalah sebesar Rp49.095.564 dan Rp22.296.156 (Catatan 40).

Total interest and sharia income from related parties for the years ended December 31, 2021 and 2020 amounted to Rp49,095,564 and Rp22,296,156 respectively (Note 40).

**31. BEBAN BUNGA DAN SYARIAH**

**31. INTEREST AND SHARIA EXPENSES**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Simpanan dana pihak ketiga			Third party deposits
Deposito	815.156.005	1.185.972.469	Time deposits
Tabungan	118.255.602	119.954.233	Savings deposits
Giro	36.223.303	70.533.478	Demand deposits
Obligasi yang diterbitkan	157.443.194	181.750.000	Bonds issued
Amortisasi emisi obligasi	6.095.559	6.420.719	Amortisation of bonds issuance cost
Simpanan dari bank lain			Deposits from other banks
<i>Call money</i>	15.211.290	24.181.090	Call money
Kewajiban repo	-	11.380.540	Repurchase liabilities
Negotiable Certificate Deposits	-	789.417	Negotiable Certificate Deposits
Lain-lain	<u>170.832</u>	<u>-</u>	Others
<b>Jumlah</b>	<u><b>1.148.555.785</b></u>	<u><b>1.600.981.946</b></u>	<b>Total</b>

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**31. BEBAN BUNGA DAN SYARIAH (lanjutan)**

Jumlah beban bunga dan syariah dari pihak berelasi untuk tahun yang berakhir pada tanggal Desember 31, 2021 dan 2020 masing-masing adalah sebesar Rp13.728.157 dan Rp12.249.474 (Catatan 40).

**31. INTEREST AND SHARIA EXPENSES (continued)**

Total interest and sharia expenses from related parties for the years ended December 31, 2021 and 2020 amounted to Rp13,728,157 and Rp12,249,474 respectively (Note 40).

**32. PENDAPATAN OPERASIONAL LAINNYA - LAIN-LAIN**

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
Penerimaan kredit yang telah dihapus buku	213.785.073	39.196.454
Laba transaksi <i>spot</i>	11.692.152	23.270.146
Pendapatan biaya administrasi jasa perbankan	9.308.118	10.239.267
Denda keterlambatan	7.514.459	5.184.181
Komisi atas <i>Internet</i> dan <i>Mobile Banking</i>	5.832.177	5.212.472
Laba transaksi <i>forward</i>	5.205.375	-
Laba transaksi <i>swap</i>	1.257.483	21.090.950
Penerimaan dari transaksi ATM	1.190.526	1.273.542
Lain-lain	8.664.906	21.558.553
<b>Jumlah</b>	<b>264.450.269</b>	<b>127.025.565</b>

Pendapatan lain-lain sebagian besar terdiri dari transaksi valuta asing.

**32. OTHER OPERATING INCOME - OTHERS**

Gain on written-off loan  
Spot transaction profit  
Receipt of administrative charges for banking services  
Penalty income  
Commission on Internet and Mobile Banking  
Forward transaction profits  
Swap transaction profits  
Income from ATM transaction  
Others

**Total**

Others mainly consists of foreign exchange transactions.

**33. BEBAN PENYISIHAN KERUGIAN PENURUNAN NILAI ASET KEUANGAN DAN NON-KEUANGAN**

Beban/(pendapatan) penyisihan kerugian penurunan nilai aset keuangan:

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
Efek-efek (Catatan 8)	18.200.213	(93.590)
Pinjaman yang diberikan (Catatan 11)	519.652.937	349.288.991
Penyertaan saham	-	(310)
Bank Garansi	5.343.999	-
Lain-lain	24.444.153	9.766.636
<b>Jumlah</b>	<b>567.641.302</b>	<b>358.961.727</b>

Beban penyisihan kerugian penurunan nilai aset non-keuangan:

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
Agunan yang diambil alih	4.578.717	109.717.512
<b>Jumlah</b>	<b>4.578.717</b>	<b>109.717.512</b>

**33. PROVISION FOR IMPAIRMENT LOSSES ON FINANCIAL AND NON-FINANCIAL ASSETS**

Provision for impairment losses expenses/(income) on financial assets are as follows:

Marketable securities (Note 8)  
Loans (Note 11)  
Investments in shares  
Bank Guarantee  
Others

**Total**

Provision of for impairment losses of non-financial assets:

Foreclosed assets

**Total**

The original consolidated financial statements included herein are in Indonesian language.

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**34. BEBAN UMUM DAN ADMINISTRASI**

**34. GENERAL AND ADMINISTRATIVE EXPENSES**

	31 Desember/December 31,		
	2021	2020	
Premi penjaminan	36.815.101	42.103.053	Insurance premium
Penyusutan (Catatan 14)	30.021.811	28.004.986	Depreciation (Note 14)
Pemeliharaan dan perbaikan	11.321.499	10.530.605	Repairs and maintenance
Sewa gedung dan kendaraan	11.231.370	15.176.212	Building and vehicle rental
Biaya <i>Internet</i> dan <i>Mobile Banking</i>	11.289.674	10.259.148	Internet and Mobile Banking expenses
Pungutan OJK Tahunan	10.053.676	13.951.033	Annual fee OJK
Jasa profesional	6.882.418	10.580.716	Professional fees
Asuransi	4.361.548	5.650.855	Insurance
Telepon, telex dan faksimili	4.037.791	4.708.932	Telephone, telex and facsimile
Pengembangan teknologi	4.084.719	3.717.435	Technology development
Pendidikan dan pengembangan	1.748.525	3.249.846	Study and development
Amortisasi aset tak berwujud (Catatan 16)	2.860.978	3.228.175	Amortisation of intangible assets (Note 16)
Pemakaian listrik, gas dan air minum	2.403.450	2.953.626	Electricity, gases and waters
Biaya jasa pihak ketiga	2.154.417	2.801.859	Third party fee
Barang cetakan dan alat tulis	2.122.558	2.304.680	Printing items and stationery
Beban bunga atas liabilitas sewa	1.343.943	2.266.959	Interest expense of lease liabilities
Iklan dan promosi	1.146.830	732.755	Advertising and promotion
Transportasi	376.349	542.620	Transportation
Benda pos dan materai	43.703	41.608	Postage and stamp
Lainnya	11.445.583	2.475.838	Others
<b>Jumlah</b>	<b>155.745.943</b>	<b>165.280.941</b>	<b>Total</b>

**35. BEBAN TENAGA KERJA**

**35. PERSONNEL EXPENSES**

	31 Desember/December 31,		
	2021	2020	
Gaji dan tunjangan	117.599.406	133.492.032	Salaries and allowance
Biaya jasa tenaga kerja	12.412.307	16.163.630	Outsourcing service expenses
Imbalan pasca kerja (Catatan 24)	(425.248)	10.345.306	Post-employment benefits (Note 24)
THR dan bonus	9.976.345	9.966.900	Tunjangan Hari Raya and bonus
Lain-lain	5.430.943	5.309.622	Others
<b>Jumlah</b>	<b>144.993.753</b>	<b>175.277.490</b>	<b>Total</b>

Termasuk dalam beban tenaga kerja adalah kompensasi yang diberikan kepada manajemen dan karyawan kunci (Catatan 40).

Included in the personnel expenses are compensation to key management and employees (Note 40).



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**36. BEBAN OPERASIONAL LAINNYA - LAIN-LAIN**

**36. OTHER OPERATING EXPENSES – OTHERS**

	31 Desember/December 31,		
	2021	2020	
Rugi atas modifikasi pinjaman yang diberikan	58.445.675	24.526.094	Loss on loan modification
Rugi transaksi valuta asing	19.555.636	47.534.665	Loss on foreign exchange transaction
Beban pajak	7.289.175	3.369.831	Tax expenses
Beban <i>membership</i> ATM dan iuran tahunan ATM	5.065.549	6.626.444	ATM membership and annual fee ATM expenses
Beban administrasi dan kliring	5.171.002	2.647.930	Administration and clearing expenses
Beban parkir dan tol	1.145.138	1.352.939	Parking and toll expenses
Beban representasi dan jamuan	196.420	291.888	Representation and entertainment expenses
Beban pemasaran	157.635	286.140	Marketing expenses
Beban keperluan kantor	170.671	257.264	Office supplies expenses
Beban sumbangan	94.670	67.732	Donation expenses
Lain-lain	11.836.457	3.327.963	Others
<b>Jumlah</b>	<b>109.128.028</b>	<b>90.288.890</b>	<b>Total</b>

**37. BEBAN NON-OPERASIONAL - BERSIH**

**37. NON-OPERATING EXPENSE - NET**

	31 Desember/December 31,		
	2021	2020	
Pendapatan non-operasional:			Non-operating income:
Laba revaluasi valas	(8.345.068)	-	Revaluation profit
Laba penjualan aset tetap (Catatan 14)	-	(915.389)	Gain on sale of fixed assets (Note 14)
Hasil sewa	(143.055)	(266.380)	Rent fees
Laba penjualan AYDA	(122.443)	-	Gain on sale of foreclosed assets
Lain-lain	(1.290.960)	(250.601)	Others
Beban non-operasional:			Non-operating expense:
Rugi penjualan AYDA	69.632.754	49.765.606	Loss on sale of foreclosed assets
Penurunan nilai properti terbengkalai		355.384	Impairment on abandoned property
Rugi penjualan aset tetap (Catatan 14)	3.098.620	-	Loss on sale of fixed assets (Note 14)
Lain-lain	1.053.291	1.854.564	Others
<b>Beban non-operasional - bersih</b>	<b>63.883.139</b>	<b>50.543.184</b>	<b>Non-operating expense - net</b>

**38. RUGI PER SAHAM**

**38. LOSS PER SHARE**

Rugi per saham dasar dihitung dengan membagi laba tahun berjalan yang dapat diatribusikan kepada pemilik Bank dengan jumlah rata-rata tertimbang saham biasa yang beredar pada tahun bersangkutan.

Basic loss per share is calculated by dividing the income for the year attributable to the Bank's shareholders with the weighted-average number of ordinary shares outstanding during the year.

Rugi per saham dilusian dihitung dengan membagi laba bersih dengan rata-rata tertimbang jumlah saham yang beredar ditambah dengan rata-rata tertimbang jumlah saham yang akan diterbitkan atas konversi efek yang berpotensi saham yang bersifat dilusif.

Diluted loss per share is calculated by dividing net income by the weighted average number of shares outstanding plus the weighted average number of shares outstanding which would be issued on the conversion of the dilutive potential shares.

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**38. RUGI PER SAHAM (lanjutan)**

**38. LOSS PER SHARE (continued)**

	<u>31 Desember/December 31,</u>		
	<u>2021</u>	<u>2020</u>	
<u>Rugi tahun berjalan yang dapat diatribusikan kepada pemilik Entitas Induk</u>			<u>Loss for the year attributable to equity holders of the Parent Company</u>
Rugi tahun berjalan yang dapat diatribusikan kepada pemilik Entitas Induk untuk perhitungan laba per saham dasar dan dilusian	(119.063.497)	(252.193.680)	Loss for the year attributable to equity holders of the Parent Company to be accounted for basic and diluted earnings per share
Jumlah rata-rata tertimbang saham biasa untuk perhitungan laba per saham dasar	9.228.483	8.951.947	Weighted-average common stock for computation of basic earnings per share
Jumlah rata-rata tertimbang saham biasa untuk perhitungan laba per saham dilusian	9.228.483	8.951.947	Weighted-average common stock for computation of diluted earnings per share
Rugi per saham dasar (dalam Rupiah penuh)	(12,90)	(28,17)	Basic loss per share (in full amount)
Rugi per saham dasar dilusian (dalam Rupiah penuh)	(12,90)	(28,17)	Diluted loss per share (in full amount)

**39. TRANSAKSI NON-KAS**

**39. NON-CASH TRANSACTIONS**

Transaksi non-kas yang penting adalah perolehan agunan yang diambil alih sebagaimana yang telah dijabarkan dalam Catatan 15.

The principal non-cash transaction is acquisition of foreclosed assets, as discussed in Note 15.

Transaksi non-kas dari rekonsiliasi liabilitas yang timbul dari aktivitas pendanaan adalah sebagai berikut:

Non-cash transaction from net debt reconciliation affected from financing activities as it follows:

	<u>31 Desember/ December 31, 2021</u>				
	<u>Saldo awal/ Beginning Balance</u>	<u>Arus kas/ Cash flow</u>	<u>Perubahan non-kas/ Non-cash activity</u>	<u>Saldo akhir/ Ending Balance</u>	
Efek-efek yang diterbitkan	1.544.029.002	(200.000.000)	4.491.027	1.348.520.029	Securities Issued
Liabilitas sewa	25.728.104	(10.942.846)	846.538	15.631.796	Lease liabilities
<b>Jumlah</b>	<b><u>1.569.757.106</u></b>	<b><u>(210.942.846)</u></b>	<b><u>5.337.565</u></b>	<b><u>1.364.151.825</u></b>	<b>Total</b>
	<u>31 Desember/ December 31, 2020</u>				
	<u>Saldo awal/ Beginning Balance</u>	<u>Arus kas/ Cash flow</u>	<u>Perubahan non-kas/ Non-cash activity</u>	<u>Saldo akhir/ Ending Balance</u>	
Efek-efek yang diterbitkan	1.780.135.010	(240.000.000)	3.893.992	1.544.029.002	Securities Issued
Liabilitas sewa	-	(11.236.978)	36.965.082	25.728.104	Lease liabilities
<b>Jumlah</b>	<b><u>1.780.135.010</u></b>	<b><u>(251.236.978)</u></b>	<b><u>40.859.074</u></b>	<b><u>1.569.757.106</u></b>	<b>Total</b>

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**40. INFORMASI MENGENAI PIHAK-PIHAK BERELASI**

**Sifat Hubungan**

Pihak-pihak berelasi adalah perusahaan dan perorangan yang mempunyai keterkaitan kepemilikan atau kepengurusan secara langsung maupun tidak langsung dengan Grup sebagaimana diungkapkan pada Catatan 2ah.

**40. INFORMATION OF RELATED PARTIES**

**Nature of Relationship**

Related parties are companies and individuals who have ownership or management relationship directly or indirectly with the Group as stated in Note 2ah.

<b>Pihak berelasi/ Related parties</b>	<b>Sifat dari hubungan/ Nature of relationship</b>	<b>Sifat dari transaksi/ Nature of transaction</b>
PT Victoria Investama Tbk	Pemegang saham/ <i>Shareholder</i>	Simpanan nasabah, pinjaman yang diberikan/ <i>Deposits from customers, loans</i>
PT Victoria Sekuritas Indonesia	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah, pinjaman yang diberikan/ <i>Deposits from customers, loans</i>
PT Grha Swahita	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah, pinjaman yang diberikan/ <i>Deposits from customers, loans</i>
PT Merak Energi Indonesia	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah, pinjaman yang diberikan/ <i>Deposits from customers, loans</i>
PT Tridaya Investindo (d/h PT BIP Tridaya Propertindo)	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah, pinjaman yang diberikan/ <i>Deposits from customers, loans</i>
PT Victoria Insurance Indonesia	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah, pinjaman yang Diberikan, asuransi aset tetap/ <i>Deposits from customers, loans, fixed assets insurance</i>
PT Padi Unggul Indonesia	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposit from customers</i>
PT Victoria Alife Indonesia	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Victoria Manajemen Investasi	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT BIP Loka Kencana	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT BIP Sentosa	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Studio One	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Asri Kencana Gemilang	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Artoda Karya Gemilang	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>

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<b>40. INFORMASI MENGENAI BERELASI (lanjutan)</b>	<b>PIHAK-PIHAK</b>	<b>40. INFORMATION OF RELATED PARTIES (continued)</b>
<b>Pihak berelasi/ Related parties</b>	<b>Sifat dari hubungan/ Nature of relationship</b>	<b>Sifat dari transaksi/ Nature of transaction</b>
PT Bhuwanatala Indah Permai	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Frogurt Sari Indonesia	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Emperor Finance Indonesia	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Grata Mulia Pratama	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Putra Asih Laksana	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Suryayudha Investindo Cipta	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT GMT Investama Mandiri Tbk	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Dwimagna Kapital Indonesia	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Jaya Bhakti Mandiri	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah, Pinjaman yang diterima/ <i>Deposits from Customers, Loans</i>
PT Magna Investa Mandiri	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Bintang Jaya Bara Sentosa	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT BIP Boga Entertainment	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT BIP Boga Permai	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Bumi Semesta Lestari	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Cahaya Medika Health Care	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah, Pinjaman yang diterima/ <i>Deposits from Customers, Loans</i>
PT Prolestari Mega Persada	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Regis Pratama Indonesia	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>

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<b>40. INFORMASI MENGENAI BERELASI (lanjutan)</b>	<b>PIHAK-PIHAK</b>	<b>40. INFORMATION OF RELATED PARTIES (continued)</b>
<b>Pihak berelasi/ Related parties</b>	<b>Sifat dari hubungan/ Nature of relationship</b>	<b>Sifat dari transaksi/ Nature of transaction</b>
PT Surya Cakra Multi Sarana	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Verena Kapital	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Sulfindo Adiusaha	Dimiliki oleh pemegang saham utama/ <i>Under common control</i>	Simpanan nasabah/ <i>Deposits from customers</i>
PT Nata Patindo	Pemegang saham/ <i>Shareholder</i>	Simpanan nasabah/ <i>Deposits from customers</i>
Suzanna Tanojo	Pemegang saham pengendali/ <i>Controlling Shareholder</i>	Simpanan nasabah/ <i>Deposits from customers</i>
Christine Tanojo	Pemegang saham/ <i>Shareholder</i>	Simpanan nasabah/ <i>Deposits from customers</i>
Luciana Tanoyo	Hubungan keluarga dengan Suzanna Tanojo/ <i>Relative of Suzanna Tanojo</i>	Simpanan nasabah/ <i>Deposits from customers</i>
Dewan Komisaris, Direksi dan pejabat eksekutif Grup/ <i>Board of Commissioners, Directors and executive officers of Group</i>	Manajemen dan karyawan kunci/ <i>Key management and employees</i>	Simpanan nasabah, pinjaman yang diberikan/ <i>Deposits from customers, loans</i>
Dewan Komisaris, Direksi dan pejabat Eksekutif Entitas Asosiasi/ <i>Board of Commissioners, Directors and executive officers of Associated Entity</i>	Manajemen dan karyawan kunci/ <i>Key management and employees</i>	Simpanan nasabah, pinjaman yang diberikan/ <i>Deposits from customers, loans</i>

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<b>40. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan)</b>			<b>40. INFORMATION OF RELATED PARTIES (continued)</b>
<b>Transaksi dengan pihak-pihak berelasi</b>			<b>Transactions with related parties</b>
Transaksi-transaksi dengan pihak-pihak berelasi adalah sebagai berikut:			Transactions with related parties are as follows:
	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
<b>Aset</b>			<b>Assets</b>
Pinjaman yang diberikan - bruto (Catatan 11)			Loans - gross (Note 11)
PT Merak Energi Indonesia	138.454.744	146.059.298	PT Merak Energi Indonesia
PT Grha Swahita	22.231.107	30.729.764	Grha Swahita
PT Tri Daya Investindo (d/h PT BIP Tridaya Propertindo)	17.328.029	17.990.873	PT Tri Daya Investindo (formerly PT BIP Tridaya Propertindo)
PT Cahaya Medika Health Care	3.201	-	PT Cahaya Medika Health Care
PT Jaya Bhakti Mandiri	1.400	-	PT Jaya Bhakti Mandiri
PT Victoria Investama Tbk	18.227.864	7.195.312	PT Victoria Investama Tbk
PT Victoria Insurance Indonesia	1.355.230	-	PT Victoria Insurance Indonesia
PT Victoria Sekuritas Indonesia	-	12.405.903	PT Victoria Securities Indonesia
Dewan Komisaris, Direksi dan pejabat eksekutif Entitas Asosiasi	10.120.534	13.563.521	Boards of Commissioners, Directors and executive officers of Associated Entity
Dewan Komisaris, Direksi dan pejabat eksekutif Grup	11.330.168	9.471.825	Boards of Commissioners, Directors and executive officers of Group
Jumlah pinjaman yang diberikan - bruto	<u>219.052.277</u>	<u>237.416.496</u>	Total loans - gross
Persentase terhadap jumlah aset	<u>0,87%</u>	<u>0,91%</u>	Percentage from total assets
<b>Liabilitas</b>			<b>Liabilities</b>
Simpanan nasabah (Catatan 19)			Deposits from customers (Note 19)
Giro	76.051.716	20.652.652	Demand deposits
Tabungan	28.314.327	42.035.533	Savings deposits
Deposito berjangka	607.935.336	210.854.746	Time deposits
Jumlah	<u>712.301.379</u>	<u>273.542.931</u>	Total
Persentase terhadap jumlah liabilitas	<u>3,44%</u>	<u>1,23%</u>	Percentage from total liabilities
Dana <i>Syirkah</i> Temporer (Catatan 25)			Temporary <i>Syirkah</i> Funds (Note 25)
Deposito <i>mudharabah</i>	3.075.000	2.655.000	Mudharabah deposit
Tabungan <i>mudharabah</i>	208.952	267.937	Mudharabah saving deposit
Giro <i>mudharabah</i>	8.957	8.957	Mudharabah demand deposit
Jumlah	<u>3.292.909</u>	<u>2.931.894</u>	Total
Persentase terhadap jumlah dana <i>syirkah</i> temporer	<u>0,27%</u>	<u>0,21%</u>	Percentage from total temporary <i>syirkah</i> funds
Pendapatan bunga dan syariah (Catatan 30)	<u>49.095.564</u>	<u>22.296.156</u>	Interest and sharia income (Note 30)
Persentase terhadap jumlah pendapatan bunga dan syariah	<u>3,05%</u>	<u>1,25%</u>	Percentage from total interest and sharia income
Beban bunga dan syariah (Catatan 31)	<u>13.728.157</u>	<u>12.249.474</u>	Interest and sharia expenses (Note 31)
Persentase terhadap jumlah beban bunga dan syariah	<u>1,20%</u>	<u>0,77%</u>	Percentage from total interest and sharia expenses

The original consolidated financial statements included herein are in Indonesian language.

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**40. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan)**      **40. INFORMATION OF RELATED PARTIES (continued)**

**Transaksi dengan pihak-pihak berelasi (lanjutan)**

**Transactions with related parties (continued)**

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Beban tenaga kerja (Catatan 35)			Personnel expenses (Note 35)
Gaji dan tunjangan Dewan Komisaris, Direksi dan pejabat eksekutif	41.416.320	45.080.465	Salaries and allowances of the Boards of Commissioners, Directors and executive officers
Persentase terhadap jumlah beban tenaga kerja	28,56%	25,72%	Percentage from total personnel expenses
<b>Liabilitas komitmen dan kontinjensi</b>			<b>Liabilities commitments and contingencies</b>
Komitmen dan kontinjensi (Catatan 41)			Commitments and contingencies (Note 41)
Fasilitas pinjaman yang belum digunakan	(37.329.246)	(7.319.711)	Unused loans facilities
<b>Jumlah</b>	<b>(37.329.246)</b>	<b>(7.319.711)</b>	<b>Total</b>
Persentase terhadap jumlah liabilitas komitmen dan kontinjensi - bersih	1,16%	0,29%	Percentage from total commitments and contingencies liabilities - net

Tabel berikut merupakan kisaran tingkat suku bunga kontraktual per tahun atas transaksi dengan pihak-pihak berelasi untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020:

The following table summarises the range of contractual interest rates per annum for transactions with related parties for the years ended December 31, 2021 and 2020:

	<b>Tingkat suku bunga per 31 Desember/ Interest rate as of December 31,</b>		
	<b>2021</b>	<b>2020</b>	
<b>Aset</b>			<b>Assets</b>
Pinjaman yang diberikan - bersih (Catatan 11)	5,25% - 12,00%	5,00% - 16,00%	Loans - net (Note 11)
<b>Liabilitas</b>			<b>Liabilities</b>
Simpanan nasabah (Catatan 19)			Deposits from customers (Note 19)
Giro	0,50% - 3,50%	0,25% - 5,00%	Demand deposits
Tabungan	1,25% - 5,00%	1,75% - 4,50%	Savings deposits
Deposito berjangka	1,00% - 7,00%	1,25% - 8,88%	Time deposits

Grup memberikan kompensasi kepada Dewan Komisaris, Direksi dan pejabat eksekutif untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2021 dan 2020 sebagai berikut:

The Group provided compensation to Board of Commissioners, Directors and executive officers for the years ended December 31, 2021 and 2020 as follows:

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
Dewan Komisaris:			Board of Commissioners:
Imbalan kerja jangka pendek*	4.386.827	3.542.105	Short-term employee benefits*
Direksi:			Directors:
Imbalan kerja jangka pendek*	15.722.494	17.038.025	Short-term employee benefits*
Pejabat eksekutif:			Executive officers:
Imbalan kerja jangka pendek*	21.306.999	24.500.335	Short-term employee benefits*
<b>Jumlah</b>	<b>41.416.320</b>	<b>45.080.465</b>	<b>Total</b>

\*Terdiri dari gaji, tunjangan, THR dan bonus

Consist of salaries, allowances, THR and bonuses\*



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**40. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan)**

**Transaksi dengan Pihak-pihak Berelasi (lanjutan)**

Tidak ada kompensasi dalam bentuk imbalan pasca kerja, imbalan kerja jangka panjang lainnya, pesangon pemutusan kontrak kerja dan pembayaran berbasis saham kepada Dewan Komisaris dan Direksi.

**41. KOMITMEN DAN KONTINJENSI**

Ikhtisar komitmen dan kontinjensi Grup yang dinyatakan dalam nilai kontrak adalah sebagai berikut:

	<b>31 Desember/December 31,</b>	
	<b>2021</b>	<b>2020</b>
<b>Komitmen:</b>		
Liabilitas komitmen:		
Fasilitas pinjaman yang belum digunakan:		
Pihak ketiga	(3.251.257.959)	(2.472.646.734)
Pihak berelasi	(37.329.246)	(7.319.711)
Liabilitas komitmen - bersih	(3.288.587.205)	(2.479.966.445)
<b>Kontinjensi:</b>		
Tagihan kontinjensi:		
Pendapatan bunga atas pinjaman bermasalah - pihak ketiga	443.666.319	357.137.355
Liabilitas kontinjensi:		
Garansi yang diterbitkan - pihak berelasi	(2.497.607)	-
Garansi yang diterbitkan - pihak ketiga	(365.543.651)	(368.502.796)
Letter of Credit	(2.523.379)	(1.760.979)
Kontinjensi - bersih	73.101.682	(13.126.420)
Jumlah liabilitas komitmen dan kontinjensi - bersih	(3.215.485.523)	(2.493.092.865)

Pada tanggal 31 Desember 2021 dan 2020, tidak terdapat komitmen dan kontinjensi signifikan lainnya selain komitmen dan kontinjensi yang telah diungkapkan di atas.

**42. PERJANJIAN PENTING**

**Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Sigma Cipta Caraka**

Pada tanggal 26 Agustus 2014, Bank dan PT Sigma Cipta Caraka telah menandatangani Perjanjian Aplikasi Terintegrasi Transaksi Manajemen, dimana PT Sigma Cipta Caraka setuju untuk memberikan layanan jasa untuk membuat sistem untuk operasi bisnis Bank.

Berdasarkan perjanjian ini, PT Sigma Cipta Caraka memiliki hak dan kewajiban sebagai berikut:

1. PT Sigma Cipta Caraka berhak mendapatkan pembayaran dari Bank;
2. PT Sigma Cipta Caraka wajib memberikan lisensi aplikasi kepada Bank;

**40. INFORMATION OF RELATED PARTIES (continued)**

**Transactions with Related Parties (continued)**

There are no compensation of post-employment benefits, other long-term benefits, termination benefits and share-based payment to the Boards of Commissioners and Directors.

**41. COMMITMENTS AND CONTINGENCIES**

The following is the summary of the Group's commitments and contingencies at contractual amounts:

	<b>31 Desember/December 31,</b>
	<b>2021</b>
<b>Commitments</b>	
Commitment liabilities:	
Unused loan facilities:	
Related parties	
Third parties	
Commitment liabilities - net	
<b>Contingencies</b>	
Contingent receivables:	
Interest receivables on non-performing loans - third parties	
Contingent liabilities:	
Guarantees issued - related parties	
Guarantees issued - third parties	
Letter of Credit	
Contingent - net	
Total commitment and contingencies liabilities - net	

As of December 31, 2021 and 2020, there are no significant commitments and contingencies other than the aforementioned commitments and contingencies.

**42. SIGNIFICANT AGREEMENT**

**Implementation of Application Integrated Transaction Management - PT Sigma Cipta Caraka**

On August 26, 2014, Bank and PT Sigma Cipta Caraka have signed Application Integrated Transaction Management, in which PT Sigma Cipta Caraka agrees to distribute Integrated Transaction Management Application for Bank's business operation.

Based on this agreement, PT Sigma Cipta Caraka have right and obligation as follows:

1. PT Sigma Cipta Caraka is entitled to receive payment from the Bank;
2. PT Sigma Cipta Caraka is obligated to give the license of the application to the Bank;

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**42. PERJANJIAN PENTING (lanjutan)**

**Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen – PT Sigma Cipta Caraka (lanjutan)**

Berdasarkan perjanjian ini, PT Sigma Cipta Caraka memiliki hak dan kewajiban sebagai berikut: (lanjutan)

3. PT Sigma Cipta Caraka wajib membuat aplikasi sesuai dengan keinginan Bank;
4. PT Sigma Cipta Caraka wajib membuat laporan kemajuan proses implementasi; dan
5. PT Sigma Cipta Caraka wajib memastikan program telah benar untuk mencegah kesalahan.

Berdasarkan Addendum V No.299/SCC/BVIC/B/2017 tanggal 25 September 2017, jangka waktu perjanjian diubah menjadi tanpa jangka waktu hingga salah satu pihak melakukan pengakhiran perjanjian.

Biaya jasa yang telah dibayarkan sampai dengan 31 Desember 2021 dan 2020 adalah sebesar:

<b>31 Desember/December 31,</b>	
<b>2021</b>	<b>2020</b>

Rupiah

4.234.606

2.721.795

Rupiah

**43. KEPENTINGAN NONPENGENDALI**

Perubahan kepentingan nonpengendali atas kekayaan neto Entitas Anak adalah sebagai berikut:

<b>31 Desember/December 31,</b>	
<b>2021</b>	<b>2020</b>

Saldo awal tahun	18.219	17.004
Bagian kepentingan nonpengendali atas laba/(rugi) tahun berjalan	218	(10)
Bagian kepentingan nonpengendali atas laba komprehensif lainnya	(4)	(44)
Bagian kepentingan nonpengendali atas keuntungan/(kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada FVOCI di dalam ekuitas Entitas Anak	(1.106)	1.269
Saldo akhir tahun	<u>17.327</u>	<u>18.219</u>

**44. INFORMASI SEGMENT USAHA**

**a. Bidang usaha**

**Nama Perusahaan/Company**

PT Bank Victoria International Tbk  
PT Bank Victoria Syariah

**42. SIGNIFICANT AGREEMENT (continued)**

**Implementation of Application Integrated Transaction Management – PT Sigma Cipta Caraka (continued)**

Based on this agreement, PT Sigma Cipta Caraka have right and obligation as follows: (continued)

3. PT Sigma Cipta Caraka is obligated to customize the application according to Bank's request;
4. PT Sigma Cipta Caraka is obligated to make official report for implementation process progress; and
5. PT Sigma Cipta Caraka is obligated to ensure the programs to prevent errors.

According to Addendum V No.299/SCC/BVIC/B/2017 dated September 25, 2017, the term of the agreement was changed to no time period until one of the party terminates the agreement.

Service fees paid as of December 31, 2021 and 2020 are amounted:

**43. NON-CONTROLLING INTEREST**

The changes in the non-controlling interest in the net assets of the Subsidiary is as follows:

Balance at beginning of the year profit/(loss) for the year attributable to non-controlling interest	17.004
Other comprehensive income attributable to non-controlling interest	(10)
Unrealised gains/(losses) on changes in fair value of marketable securities measured at FVOCI in Subsidiary's equity to non-controlling interest	(44)
Balance at end of the year	<u>18.219</u>

**44. SEGMENT INFORMATION**

**a. Business activities**

**Bidang Usaha/Business Activities**

Perbankan Konvensional/Conventional banking  
Perbankan Syariah/Banking activities based on Sharia Principles

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**44. INFORMASI SEGMENT USAHA (lanjutan)**

**44. SEGMENT INFORMATION (continued)**

**b. Segmen Usaha**

**b. Business Segment**

**Segmen Operasi**

**Operating Segment**

Berikut adalah informasi segmen Grup berdasarkan segmen operasi:

The following is the segment information of the Group based on operating segments:

	31 Desember/ December 31, 2021				
	Konvensional/ Conventional	Syariah/ Sharia	Eliminasi/ Elimination	Jumlah/ Total	
Pendapatan bunga dan syariah - bersih	418.200.022	45.454.194	-	463.654.216	Interest and sharia income - net
Pendapatan operasional lainnya	430.648.582	27.800.842	(4.520.081)	453.929.343	Other operating income
Beban operasional lainnya	(943.567.402)	(61.001.166)	-	(1.004.568.568)	Other operating expense (Loss)/income from operations
(Rugi)/laba operasional	(94.718.798)	12.253.870	(4.520.081)	(86.985.009)	
Jumlah aset	23.659.941.243	1.658.424.256	(371.222.454)	24.947.143.045	Total assets
Jumlah liabilitas	20.648.874.638	66.969.737	13.618.816	20.702.225.559	Total liabilities

	31 Desember/ December 31, 2020				
	Konvensional/ Conventional	Syariah/ Sharia	Eliminasi/ Elimination	Jumlah/ Total	
Pendapatan bunga dan syariah - bersih	153.152.137	36.506.312	-	189.658.449	Interest and sharia income - net
Pendapatan operasional lainnya	476.262.011	14.528.670	214.606	491.005.287	Other operating income
Beban operasional lainnya	(880.557.122)	(47.795.920)	(10)	(928.353.052)	Other operating expense (Loss)/income from operations
(Rugi)/laba operasional	(251.142.974)	3.239.062	214.596	(247.689.316)	
Jumlah aset	24.279.915.899	2.295.412.644	(353.921.071)	26.221.407.472	Total assets
Jumlah liabilitas	21.662.013.641	536.673.281	(837.065)	22.197.849.857	Total liabilities

**Segmen Geografis**

**Geographic Segment**

Berikut ini adalah informasi segmen Grup berdasarkan daerah geografis:

The following is the business segment information of the Group based on geographical area:

	31 Desember/ December 31, 2021					
	Jadetek/ Jadetek	Jawa Barat/ West Java	Jawa Tengah & Jawa Timur /Central & East Java	Luar Jawa/ Non Java		Jumlah/ Total
Pendapatan bunga dan syariah - bersih	427.758.837	7.085.722	15.898.127	12.911.530	463.654.216	Interest and sharia income - net
Pendapatan operasional lainnya	451.261.829	1.447.387	517.090	703.037	453.929.343	Other operating income
Beban penyisihan kerugian penurunan nilai aset keuangan dan non-keuangan	(567.083.569)	(2.510.067)	(2.626.383)	-	(572.220.019)	Provision for impairment losses on financial and non-financial assets
Beban umum dan Administrasi, tenaga kerja, kerugian atas perubahan nilai wajar dan lain-lain	(390.223.327)	(6.909.004)	(21.375.437)	(13.840.781)	(432.348.549)	General and administrative expenses, personnel expenses, unrealized loss changes of fair value and others
Rugi operasional	(78.286.230)	(885.962)	(7.586.603)	(226.214)	(86.985.009)	Loss from operations
Beban non-operasional - bersih	(62.046.406)	(106.458)	(1.719.371)	(10.904)	(63.883.139)	Non-operating expense - net
Rugi sebelum beban pajak penghasilan	(140.332.636)	(992.420)	(9.305.974)	(237.118)	(150.868.148)	loss before income tax expense
Manfaat pajak penghasilan	31.804.651	-	-	-	31.804.651	loss tax benefit
(Rugi)/laba bersih tahun berjalan	(108.527.985)	(992.420)	(9.305.974)	(237.118)	(119.063.497)	Net (loss)/profit for the year
Jumlah aset	24.362.455.032	93.695.097	335.831.364	155.161.552	24.947.143.045	Total assets
Jumlah liabilitas	19.294.325.767	227.555.199	580.356.223	599.988.370	20.702.225.559	Total liabilities

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**44. INFORMASI SEGMENT USAHA (lanjutan)**

**b. Segmen Usaha (lanjutan)**

**Segmen Geografis (lanjutan)**

Berikut ini adalah informasi segmen Grup berdasarkan daerah geografis: (lanjutan)

**44. SEGMENT INFORMATION (continued)**

**b. Business Segment (continued)**

**Geographic Segment (continued)**

The following is the business segment information of the Group based on geographical area: (continued)

	31 Desember/ December 31, 2020					
	Jadetek/ Jadetek	Jawa Barat/ West Java	Jawa Tengah & Jawa Timur /Central & East Java	Luar Jawa/ Non Java	Jumlah/ Total	
Pendapatan bunga dan syariah - bersih	165.814.892	5.199.035	13.108.541	5.535.981	189.658.449	Interest and sharia income - net
Pendapatan operasional lainnya	486.265.244	3.203.223	494.736	1.042.084	491.005.287	Other operating income
Beban penyisihan kerugian penurunan nilai aset keuangan dan non-keuangan	(439.718.526)	(125.130)	(9.092)	-	(439.852.748)	Provision for impairment losses on financial and non-financial assets
Beban umum dan Administrasi, tenaga kerja, kerugian atas perubahan nilai wajar dan lain-lain	(441.047.611)	(8.795.751)	(27.145.416)	(11.511.526)	(488.500.304)	General and administrative expenses, personnel expenses, unrealized loss changes of fair value and others
Rugi operasional	(228.686.001)	(518.623)	(13.551.231)	(4.933.461)	(247.689.316)	Loss from operations
Pendapatan non operasional - bersih	(46.968.130)	44.766	(3.439.418)	(180.402)	(50.543.184)	Non-operating income - net
Rugi sebelum beban pajak penghasilan	(275.654.131)	(473.857)	(16.990.649)	(5.113.863)	(298.232.500)	Loss before income tax expense
Manfaat pajak penghasilan	46.038.810	-	-	-	46.038.810	Loss tax benefit
Rugi bersih tahun berjalan	(229.615.321)	(473.857)	(16.990.649)	(5.113.863)	(252.193.690)	Net loss for the year
Jumlah aset	25.691.043.372	105.107.656	330.583.229	94.673.215	26.221.407.472	Total assets
Jumlah liabilitas	20.627.724.121	282.923.369	540.570.728	746.631.639	22.197.849.857	Total liabilities

**45. JAMINAN PEMERINTAH TERHADAP KEWAJIBAN PEMBAYARAN BANK UMUM**

Berdasarkan Undang-Undang Republik Indonesia No. 24 tanggal 22 September 2004, efektif sejak tanggal 22 September 2005, Lembaga Penjamin Simpanan (LPS) dibentuk untuk menjamin kewajiban tertentu bank-bank umum berdasarkan program penjaminan yang berlaku. Undang-undang tersebut telah diubah dengan Peraturan Pemerintah sebagai Pengganti Undang-Undang No. 3 Tahun 2008, yang mana telah ditetapkan menjadi Undang-Undang sejak tanggal 13 Januari 2009 berdasarkan Undang-Undang Republik Indonesia No. 7 Tahun 2009.

Berdasarkan Peraturan Pemerintah Republik Indonesia No. 66/2008 tanggal 13 Oktober 2008 mengenai besarnya nilai simpanan yang dijamin LPS, pada tanggal 31 Desember 2021 dan 2020, jumlah simpanan yang dijamin LPS adalah simpanan sampai dengan Rp2.000.000 untuk nasabah per bank.

**45. GOVERNMENT GUARANTEE ON OBLIGATIONS OF PRIVATE BANKS**

Based on Law No. 24 dated September 22, 2004, effective 22 September 2005, Indonesia Deposit Insurance Corporation (LPS) was established to provide guarantee on certain deposits from customers based on prevailing guarantee schemes. The law was changed with the Government Regulation as at the Replacement of Law No. 3 Year 2008, which was stipulated as a law since January 13, 2009 based on the Republic of Indonesia Law No. 7 Year 2009.

Based on Government of Republic of Indonesia Regulation No. 66/2008 dated October 13, 2008 regarding the deposit amount guaranteed by LPS, as of December 31, 2021 and 2020, the deposit amount guaranteed by LPS for every customer in a bank was a maximum of Rp2,000,000.

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**45. JAMINAN PEMERINTAH TERHADAP  
KEWAJIBAN PEMBAYARAN BANK UMUM  
(lanjutan)**

Bank adalah peserta dari program penjaminan tersebut dan beban premi penjaminan Pemerintah yang dibayar selama tahun yang berakhir tanggal 31 Desember 2021 dan 2020 masing-masing adalah sebesar Rp33.636.381 dan Rp39.902.270.

**46. MANAJEMEN RISIKO**

Kegiatan usaha Grup senantiasa dihadapkan pada risiko-risiko yang berkaitan erat dengan fungsinya sebagai lembaga intermediasi keuangan. Oleh karena itu, kegiatan operasional Grup dikelola dengan baik supaya tidak menimbulkan kerugian. Di dalam melaksanakan strategi bisnis Grup, maka manajemen berupaya untuk dapat menyelaraskan antara:

- Pertumbuhan bisnis dan peningkatan pangsa pasar kredit dan portofolio pendanaan.
- Peningkatkan efisiensi operasional perbankan.
- Menjaga tingkat kebutuhan modal minimum sesuai ketentuan otoritas.
- Implementasi manajemen risiko yang berorientasi bisnis.

Sebagai lembaga intermediasi keuangan, Grup menyadari bahwa semakin kompleksnya kegiatan usaha yang diikuti dengan perkembangan lingkungan internal maupun eksternal sehingga meningkatkan risiko dalam menjalankan kegiatan usahanya. Menyadari akan risiko yang dihadapi, Grup harus menerapkan kebijakan manajemen risiko yang baik dan dapat beradaptasi dengan perubahan yang terjadi dan meningkatkan praktek tata kelola yang sehat (*Good Corporate Governance*) pada keseluruhan lingkup aktivitas usaha.

Penerapan manajemen risiko yang efektif dengan mempertimbangkan segala aspek dan prinsip kehati-hatian (*prudential principles*) ini bertujuan untuk memastikan bahwa potensi yang timbul dalam kegiatan usahanya dapat diidentifikasi, diukur, dipantau, dan dimonitor akan memberikan manfaat berupa peningkatan kepercayaan *stakeholder*.

**45. GOVERNMENT GUARANTEE ON OBLIGATIONS  
OF PRIVATE BANKS (continued)**

The Bank is a participant of this government guarantee program and the premium paid for the year ended December 31, 2021 and 2020 amounted to Rp33,636,381 and Rp39,902,270, respectively.

**46. RISK MANAGEMENT**

Group's business activities always faced with risks that are closely related to its function as a financial intermediary. Therefore, the Group's operations are properly managed so it could prevent any harm. In the performance of the Group's business strategy, management seeks to harmonise between:

- Business growth and increased market share of credit and financing portfolios.
- Increasing the efficiency of banking operations.
- Maintain the level of minimum capital requirements pursuant to the authority.
- Implementation of business-oriented risk management.

As a financial intermediary institution, the Group realises that the business activity is more complex and also depends with development of internal and external conditions that increase the Group's risk in conducting its business activities. Realising the risk it faces, the Group must apply good risk management policy that can adapt with the changes and also enhance the Good Corporate Governance Practice in the whole activities of the Group.

The effective application of risk management by considering all aspects and prudential principles which has objective to ensure that potential arises in conducting its business activities can be identified, measured, reviewed and monitored will give a benefit to increase stakeholder trust to the Group.

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**46. MANAJEMEN RISIKO (lanjutan)**

Dalam menunjang penerapan manajemen risiko, Grup senantiasa berupaya meningkatkan pengawasan aktif dari Dewan Komisaris dan Direksi, antara lain melalui unit kerja dan komite untuk menunjang proses pengendalian risiko. Hal ini diwujudkan dengan adanya Satuan Kerja Manajemen Risiko (SKMR) di bawah wadah Komite Manajemen Risiko yang berwenang dan bertanggung jawab dalam menyusun dan menetapkan kebijakan manajemen risiko serta perubahannya termasuk strategi manajemen risiko dan rencana kontinjensi apabila terjadi kondisi yang tidak diinginkan.

Selain hal tersebut di atas, terdapat komite lain yang bertugas untuk menangani risiko secara lebih spesifik, yaitu antara lain Komite Kredit Tingkat Direksi (KKD), *Assets & Liabilities Committee* (ALCO), Komite Teknologi Sistem Informasi, sedangkan pada level Dewan Komisaris terdapat Komite Pemantau Risiko, Komite Nominasi dan Remunerasi, Komite Audit dan Komite Tata Kelola Terintegrasi.

Semua Dewan Komisaris dan Direksi telah mengikuti Ujian Sertifikasi Manajemen Risiko yang diselenggarakan oleh Badan Sertifikasi Manajemen Risiko dan Lembaga Sertifikasi Profesi Perbankan.

Seiring dengan perkembangan globalisasi dan teknologi informasi, Lembaga Jasa Keuangan (LJK) merupakan salah satu industri yang memiliki sistem keuangan yang sangat kompleks, dinamis, dan saling terkait antar masing-masing sektor jasa keuangan baik dalam produk dan kelembagaan, maupun kepemilikan yang menyebabkan meningkatnya eksposur risiko. Menghadapi kondisi tersebut, penerapan manajemen risiko akan dilakukan secara terintegrasi dengan memperhatikan seluruh risiko, baik yang berasal dari perusahaan anak dan perusahaan terelasi (*sister company*), maupun entitas lainnya yang tergabung dalam suatu konglomerasi keuangan.

**46. RISK MANAGEMENT (continued)**

*In supporting the implementation of risk management, the Group continuously improve the active monitoring from the Boards of Commissioners and Directors, including establishing several permanent working units and committee to support risks control process. This is implemented by establishing Risk Management Working Unit (SKMR) under Risk Management Committee who authorise and responsible to prepare and decide risk management policy and its changes including risk management strategy and contingency plan if an abnormal condition happens.*

*Besides the above matters, there are other committee to handle more specific risks, such as Credit Committee at Board of Directors level (KKD), Assets & Liabilities Committee (ALCO), Information System Technology Committee, whereas at the Board of Commissioners level, there are Risk Monitoring Committee, Nomination and Remuneration Committee, Audit Committee and Integrated Corporate Governance Committee.*

*All of the Boards of Commissioners and Directors passed the examination of Risk Management Certification that was held by the Board of Risk the Management Certification and Banking Professional Certification Institute.*

*As a response with the development of globalisation and information technology, Financial Services Institution (LJK) is one of industry which has a complex, dynamic and inter-related between each financial sector, both in product and organisation, and ownership which can increase the risk exposure. Facing this circumstances, the implementation of risk management will be performed integratedly by concerning all the risks, including from subsidiary and sister companies, and other financial entities included in one financial conglomeration.*

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**46. MANAJEMEN RISIKO (lanjutan)**

Manajemen Risiko Terintegrasi telah diterapkan secara komprehensif dan efektif sesuai POJK No. 17/POJK.03/2014 dan SEOJK No. 14/SEOJK.03/2015 tentang Penerapan Manajemen Risiko Terintegrasi Bagi Konglomerasi Keuangan. LJK yang ditunjuk sebagai Entitas Utama dalam hal Pengawasan Terintegrasi Konglomerasi Keuangan Grup Victoria adalah Bank Victoria.

Dalam menunjang penerapan manajemen risiko terintegrasi, maka Grup berupaya meningkatkan pengawasan aktif Dewan Komisaris dan Direksi, antara lain melalui Satuan Kerja Manajemen Risiko Terintegrasi (SKMRT) di bawah wadah Komite Manajemen Risiko Terintegrasi, sedangkan pada level Dewan Komisaris terdapat Komite Tata Kelola Terintegrasi.

**Risiko kredit**

Risiko kredit adalah risiko yang terjadi akibat kegagalan debitur dan/atau pihak lawan (*counterparty*) dalam memenuhi kewajiban mereka. Tujuan dari pengelolaan risiko kredit adalah untuk mengendalikan dan mengelola eksposur risiko kredit dalam parameter yang dapat diterima, sekaligus memaksimalkan *return on risk*.

Dalam mengelola risiko kredit, Grup telah memiliki kebijakan dan pedoman perkreditan, yang disempurnakan secara berkala, dengan tetap didasarkan pada prinsip pengelolaan risiko yang independen sesuai dengan peraturan OJK dan peraturan eksternal lainnya dan kebijakan manajemen risiko yang terkait dengan pemberian pinjaman. Pengelolaan risiko kredit mencakup aktivitas penyaluran kredit serta eksposur risiko kredit lainnya seperti penempatan, pembelian efek-efek, dan penyertaan, yang dikelola secara komprehensif baik pada tingkat portofolio maupun transaksi.

Grup melakukan evaluasi atas tingkat risiko kredit terkait pemberian fasilitas kepada nasabah atau proyek dengan mempertimbangkan berbagai faktor, antara lain sebagai berikut:

- i. Historis dan proyeksi kondisi keuangan, termasuk laporan posisi keuangan, laporan laba rugi, dan laporan arus kas nasabah;
- ii. Riwayat hubungan kredit;
- iii. Kualitas, kinerja dan pengalaman dari pengelolaan nasabah;
- iv. Sektor industri nasabah;

**46. RISK MANAGEMENT (continued)**

*Integrated Risk Management has been implemented comprehensively and effectively in accordance with POJK No. 17/POJK.03/2014 and SEOJK No. 14/SEOJK.03/2015 about Implementation of Integrated Risk Management for Financial Conglomeration. The appointed LJK as the main entity in the Integrated Monitoring of Financial Conglomeration is Bank Victoria.*

*In supporting the implementation of integrated risk management, Group encourage the active monitoring by Board of Directors and Board of Commissioners, such as through SKMRT under supervision of Integrated Risk Monitoring Committee, whereas at the Board of Commissioners level through the Integrated Corporate Governance Committee.*

**Credit risk**

*Credit risk is the risk by debtors and/or counterparty's failure to fulfil their obligations. The objective of credit risk management is to control and manage credit risk exposures within acceptable parameters, while optimising the return on risk.*

*In managing credit risk, the Group has credit policies and standard operations, that are enhanced periodically in accordance with independent risk management principles based on OJK regulations and other external regulatory and risk management policies related to credit. Management of credit risk include lending activities and other credit risk exposures such as placement, purchase of securities and investments, which are managed comprehensively at both portfolio and transaction.*

*The Group evaluates the credit risk level related to financing the customers or projects by considering various factors, which include the following:*

- i. Historical and projected financial condition, including statement of financial position, profit or loss, and statement of cash flows of the customers;*
- ii. Credit history;*
- iii. Quality, performance and experience of the customers' management;*
- iv. Customers' industry sector;*



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**46. MANAJEMEN RISIKO (lanjutan)**

Grup melakukan evaluasi atas tingkat risiko kredit terkait pemberian fasilitas kepada nasabah atau proyek dengan mempertimbangkan berbagai faktor, antara lain sebagai berikut: (lanjutan)

- v. Kualitas agunan debitur, baik berupa aset berwujud maupun agunan setara kas;
- vi. Posisi nasabah dalam persaingan industri sejenis; serta
- vii. Kondisi ekonomi secara umum.

Terhadap eksposur risiko kredit yang lebih khusus seperti kredit perorangan, fasilitas antar bank dan sebagainya, Grup melakukan evaluasi secara tersendiri dengan menggunakan faktor yang mungkin berbeda, sesuai dengan karakteristik spesifik dari setiap jenis eksposur. Proses persetujuan fasilitas dengan eksposur risiko kredit dilakukan berdasarkan prinsip bahwa setiap fasilitas dan eksposur risiko kredit harus diproses melalui komite kredit dan/atau komite lainnya.

Selain itu, pengelolaan risiko kredit yang lebih spesifik juga dilakukan atas portofolio pinjaman yang bermasalah maupun eksposur risiko kredit lain. Upaya yang dilakukan di antaranya adalah restrukturisasi fasilitas pinjaman yang bermasalah, pengambilalihan agunan dan pembentukan cadangan untuk menutup potensi kerugian, hingga pelaksanaan hapus buku. Grup telah menjalankan proses identifikasi, pengukuran, pemantauan dan pengendalian risiko yang mencakup profil risiko kredit secara komprehensif. Dalam rangka pengendalian risiko kredit secara komprehensif, Grup terus meninjau dan menyempurnakan pelaksanaan fungsi pengendalian risiko kredit.

Manajemen risiko kredit diarahkan untuk meningkatkan keseimbangan antara ekspansi kredit yang sehat dengan pengelolaan pinjaman yang berprinsip kehati-hatian (*prudent*) agar terhindar dari risiko penurunan kualitas kredit atau menjadi *Non Performing Loan* (NPL), serta mengoptimalkan penggunaan modal yang dialokasikan untuk risiko kredit.

**46. RISK MANAGEMENT (continued)**

*The Group evaluates the credit risk level related to financing the customers or projects by considering various factors, which include the following: (continued)*

- v. Debtor's collateral quality, both in form of tangible assets or cash equivalents;*
- vi. Customers' competitive position in the industry; and*
- vii. General economic conditions.*

*In relation to the specific credit risk exposure such as individual credit, inter-bank facility and others, the Group separately evaluates based on other factors that may be different, according to the specific characteristics of each exposure. The approval process of facility with credit risk exposure are executed based on a principal that each facility and credit risk exposure approval must be processed through the credit committee and/or other committee.*

*Furthermore, specific credit risk management is performed on non-performing loan portfolio and other credit risk exposures. Such efforts, among others, are restructuring on non-performing loans, foreclosing assets and providing allowances to cover potential losses, and write-off. The Group has identified, measured, monitored, and controlled risks which covers credit risk profile in a comprehensive risk management. In order to control credit risk in a comprehensive manner, the Group continues to review and accomplish the implementation of credit risk control function.*

*Credit risk management is mainly to improve the balance of credit expansion and the prudent credit management that could mitigate the risk of the deterioration of loan quality or loans from becoming Non Performing Loan, and to optimise the use of capital allocated for the credit risk.*

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko kredit (lanjutan)**

i. Pengukuran risiko kredit

Dalam mengukur risiko kredit untuk pinjaman yang diberikan, Grup mempertimbangkan estimasi kerugian saat debitur kemungkinan tidak dapat memenuhi kewajibannya dan estimasi kerugian atas kewajiban debitur yang telah wanprestasi. Untuk mengelola dan memantau risiko atas penyaluran pinjaman, secara rutin Grup melakukan analisis terhadap portofolio pinjaman dan segmentasi bisnis berdasarkan kualitas kredit dari debitur.

ii. Pengendalian batas risiko dan kebijakan mitigasi

Untuk menghindari risiko konsentrasi kredit, Grup menetapkan limit eksposur untuk setiap nasabah baik pihak berelasi maupun pihak ketiga dalam kebijakan batas maksimum pemberian pinjaman.

Grup mengelola, membatasi dan mengendalikan konsentrasi risiko kredit, secara khusus terhadap debitur individu maupun kelompok, dan industri maupun geografis.

Batas pemberian pinjaman ditelaah mengikuti perubahan pada kondisi pasar dan ekonomi dan evaluasi kredit secara periodik dan penilaian atas kemungkinan wanprestasi.

Dalam proses pengajuan pinjaman, pembelian efek-efek maupun penempatan pada bank lain, Grup menetapkan *dual control* dalam rangka *four eyes principles* yang melibatkan petugas pemasaran, petugas pemeriksa dan pejabat yang berwenang.

Beberapa pengendalian spesifik lainnya dan pengukuran mitigasi dijelaskan di bawah ini:

**Agunan**

Pengelolaan risiko kredit terhadap pinjaman yang diberikan tidak hanya menjaga kualitas pinjaman namun juga memitigasi risiko dengan tambahan aset sebagai jaminan atas kewajiban kontraktual debitur. Beberapa jenis agunan yang diterima dalam rangka memitigasi risiko kredit antara lain:

**46. RISK MANAGEMENT (continued)**

**Credit risk (continued)**

i. Credit risk measurement

*In measuring credit risk for loans, the Group considers the estimated losses when debtor may be unable to meet its obligations and estimated losses on defaulting debtor's liabilities. To manage and monitor the credit risk, the Group conducts a regular analysis of the loan portfolio and business segmentation based on the credit quality of debtor.*

ii. Risk limit control and mitigation policies

*To minimise the credit concentration risk, the Group sets an exposure limit to each related and third parties as mentioned in the maximum lending limit policy.*

*The Group manages, limits and controls the credit concentration risk, in particular, to individual counterparties and groups, and to industries and geographies.*

*Lending limits are reviewed in the light of changing market and economic conditions and periodic credit reviews and assessments of probability of default.*

*In the loan application process, purchase of securities and placement with other banks, the Group sets dual control as part of four eyes principles which involve marketing officers, supervisors and authorised approvers.*

*Some other specific controls and the mitigation measurement are explained as follows:*

**Collateral**

*Risk management of loans, not only maintain loans quality but also to mitigate the risk with additional assets as collateral to cover financial contractual obligation of debtors. Some of acceptable collateral to mitigate the credit risk such as:*

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko kredit (lanjutan)**

ii. Pengendalian batas risiko dan kebijakan mitigasi (lanjutan)

- Kas (Deposito)
- Tanah dan/atau bangunan
- Mesin dan peralatan
- Kendaraan bermotor
- Piutang
- Persediaan
- Garansi perorangan/Perusahaan/Bank

iii. Risiko kredit maksimum

Untuk aset keuangan yang diakui di laporan posisi keuangan konsolidasian, eksposur maksimum terhadap risiko kredit sama dengan nilai tercatat. Untuk bank garansi, eksposur maksimum terhadap risiko kredit adalah nilai maksimum yang harus dibayarkan oleh Grup jika liabilitas atas bank garansi terjadi. Untuk fasilitas pinjaman kepada nasabah yang belum digunakan, eksposur maksimum terhadap risiko kredit adalah sebesar komitmen tersebut.

Eksposur maksimum risiko kredit terhadap aset keuangan pada laporan posisi keuangan konsolidasian pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

	<b>Eksposur maksimum/ Maximum exposure</b>	
	<b>2021</b>	<b>2020</b>
<b><u>Laporan posisi keuangan konsolidasian</u></b>		
Giro pada Bank Indonesia	663.113.716	612.623.334
Giro pada bank lain	405.666.998	184.920.912
Penempatan pada Bank Indonesia dan bank lain	763.852.298	1.692.224.733
Efek-efek	5.186.595.495	6.416.334.165
Efek-efek yang dibeli dengan janji dijual kembali	690.714.570	447.804.800
Pendapatan bunga yang masih akan diterima	364.693.547	248.240.453
Pinjaman yang diberikan, pembiayaan dan piutang syariah	15.489.074.411	14.843.354.298
Penyertaan saham	34.887.238	57.368.030
Aset lain-lain	38.438.654	30.638.516
Jumlah	<u>23.637.036.927</u>	<u>24.533.509.241</u>
Dikurangi: Cadangan kerugian penurunan nilai	<u>(714.868.857)</u>	<u>(617.814.473)</u>
	<b><u>22.922.168.070</u></b>	<b><u>23.915.694.768</u></b>

**46. RISK MANAGEMENT (continued)**

**Credit risk (continued)**

ii. Risk limit control and mitigation policies (continued)

- Cash (Deposits)
- Land and/or building
- Machinery and equipment
- Vehicle
- Trade receivables
- Inventory
- Personal/Corporate/Bank Guarantee

iii. Maximum credit risk

For financial assets recognised on the consolidated statements of financial position, the maximum exposure to credit risk equals their carrying amount. For bank guarantees, the maximum exposure to credit risk is the maximum amount that the Group has to pay if the obligations of the bank guarantees issued are called upon. For the unused loan facilities, the maximum exposure to credit risk is the committed amount.

The maximum exposure to credit risk of financial assets on consolidated statements of financial position as of December 31, 2021 and 2020 are as follows:

<b><u>Consolidated statements of financial position</u></b>
Current accounts with Bank Indonesia
Current accounts with other banks
Placements with Bank Indonesia and other banks
Marketable securities
Securities purchased under resale agreement
Interest receivable
Loans, sharia financing and receivables
Investment in shares
Other Assets
Total
Less: Allowance for impairment losses

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko kredit (lanjutan)**

iii. Risiko kredit maksimum (lanjutan)

Eksposur maksimum risiko kredit terhadap rekening administratif pada tanggal 31 Desember 2021 dan 2020 adalah sebagai berikut:

	<u>31 Desember/ December 31,</u> <u>2021</u>	<u>2020</u>
<b>Rekening administratif</b>		
Fasilitas pinjaman yang belum digunakan	3.288.587.205	2.479.966.445
Letter of credit	2.523.379	1.760.979
Garansi yang diberikan	<u>368.041.258</u>	<u>370.263.775</u>
<b>Jumlah</b>	<u><b>3.656.628.463</b></u>	<u><b>2.850.230.220</b></u>

Tabel di atas menggambarkan eksposur maksimum atas risiko kredit bagi Grup pada tanggal 31 Desember 2021 dan 2020, sebelum memperhitungkan cadangan kerugian penurunan nilai agunan. Untuk aset keuangan, eksposur di atas ditentukan berdasarkan nilai tercatat bruto seperti yang diungkapkan pada laporan posisi keuangan konsolidasian.

Seperti yang telah dijelaskan di atas, pada tanggal 31 Desember 2021 dan 2020, 65,66% dan 60,64% dari jumlah eksposur maksimum adalah berasal dari pinjaman yang diberikan (sebelum memperhitungkan cadangan kerugian penurunan nilai).

iv. Evaluasi penurunan nilai

Untuk tujuan akuntansi, Grup menggunakan model kerugian kredit ekspektasian untuk pengakuan kerugian penurunan nilai aset keuangan.

Pertimbangan utama evaluasi penurunan nilai pinjaman yang diberikan termasuk adanya pembayaran pokok atau bunga yang jatuh tempo lebih dari 30 (tiga puluh) hari dan 90 (sembilan puluh) hari atau terdapat kesulitan atau pelanggaran dari persyaratan yang terdapat dalam kontrak awal yang diketahui. Grup melakukan evaluasi penurunan nilai dalam 2 (dua) area yaitu evaluasi penurunan nilai secara individual dan evaluasi penurunan nilai secara kolektif.

**46. RISK MANAGEMENT (continued)**

**Credit risk (continued)**

iii. Maximum credit risk (continued)

The maximum credit risk exposures relating to administrative accounts as of December 31, 2021 and 2020 are as follows:

	<u>31 Desember/ December 31,</u> <u>2021</u>	<u>2020</u>
<b>Administrative accounts</b>		
Unused loan facilities	3.288.587.205	2.479.966.445
Letter of credit	2.523.379	1.760.979
Guarantees issued	<u>368.041.258</u>	<u>370.263.775</u>
<b>Total</b>	<u><b>3.656.628.463</b></u>	<u><b>2.850.230.220</b></u>

The table above shows the maximum exposure to credit risk for the Group as of December 31, 2021 and 2020, gross of allowance for impairment losses and collateral. For financial assets, the exposures set out above are based on the gross carrying value as disclosed in the consolidated statements of financial position.

As mentioned above, as of December 31, 2021 and 2020, 65.66% and 60.64% of the total maximum exposure, respectively, is derived from loans (gross of allowance for impairment losses).

iv. Impairment assessment

For accounting purposes, the Group uses an expected credit loss model for the recognition of losses on impaired financial assets.

The main considerations for the loan impairment assessment include whether any payments of principal or interest are overdue by more than 30 (thirty) days and 90 (ninety) days or there are any known difficulties, or infringement of the original terms of the contract. The Group addresses impairment assessment in 2 (two) areas: individually assessed allowances and collectively assessed allowances.

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko kredit (lanjutan)**

iv. Evaluasi penurunan nilai (lanjutan)

a. Evaluasi penurunan nilai secara individual

Grup menentukan penyisihan kerugian penurunan nilai secara individual untuk masing-masing pinjaman signifikan yang diberikan dan memiliki bukti objektif penurunan nilai.

b. Evaluasi penurunan nilai secara kolektif

Evaluasi penyisihan kerugian penurunan nilai secara kolektif dilakukan atas pinjaman yang diberikan yang tidak signifikan secara individual dan juga untuk pinjaman signifikan yang diberikan yang tidak memiliki bukti objektif penurunan nilai.

v. Kualitas aset keuangan

Pada tanggal 31 Desember 2021 dan 2020, eksposur risiko kredit atas aset keuangan terbagi atas:

**46. RISK MANAGEMENT (continued)**

**Credit risk (continued)**

iv. Impairment assessment (continued)

a. Individually assessed allowances

The Group determines the allowances for impairment losses for each significant loans on an individual basis and have objective evidence of impairment.

b. Collectively assessed allowances

Allowances for impairment losses are assessed collectively for losses on loans that are not individually significant and for individually significant loans with no objective evidence of impairment.

v. Quality of financial assets

As of December 31, 2021 and 2020, credit risk exposure relating to financial assets are divided as follows:

	31 Desember/ December 31, 2021				Jumlah/ Total	
	Stage 1	Stage 2	Stage 3	Syariah/ Sharia		
Giro pada Bank Indonesia	615.714.645	-	-	47.399.071	663.113.716	Current accounts with Bank Indonesia
Giro pada bank lain	401.871.737	-	-	3.795.261	405.666.998	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank lain	578.852.298	-	-	185.000.000	763.852.298	Placements with Bank Indonesia and other banks
Efek-efek	4.648.563.587	-	-	538.031.908	5.186.595.495	Marketable securities
Efek-efek yang dibeli dengan janji dijual kembali	690.714.570	-	-	-	690.714.570	Securities purchased under resale agreement
Pinjaman yang diberikan, pembiayaan dan piutang syariah	12.174.588.727	1.441.372.590	1.067.143.792	805.969.302	15.489.074.411	Loans, sharia financing and receivables
Pendapatan bunga yang masih akan diterima	219.347.307	131.672.248	-	13.673.992	364.693.547	Interest receivables
Penyertaan Saham	34.887.238	-	-	-	34.887.238	investment in share
Aset lain-lain	38.438.654	-	-	-	38.438.654	Other assets
Jumlah	19.402.978.763	1.573.044.838	1.067.143.792	1.593.869.534	23.637.036.927	Total
Dikurangi: Cadangan kerugian penurunan nilai					(714.868.857)	Less: Allowance for impairment losses
					<u>22.922.168.070</u>	

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko kredit (lanjutan)**

v. Kualitas aset keuangan (lanjutan)

	31 Desember/ December 31, 2020					Jumlah/ Total	
	Stage 1	Stage 2	Stage 3	Syariah/ Sharia			
Giro pada Bank Indonesia	570.507.475	-	-	42.115.859	612.623.334	Current accounts with Bank Indonesia	
Giro pada bank lain	182.708.000	-	-	2.212.912	184.920.912	Current accounts with other banks	
Penempatan pada Bank Indonesia dan bank lain	1.444.224.733	-	-	248.000.000	1.692.224.733	Placements with Bank Indonesia and other banks	
Efek-efek	5.688.382.090	-	15.268.728	712.683.347	6.416.334.165	Marketable securities Securities purchased under resale	
Efek-efek yang dibeli dengan janji dijual kembali	447.804.800	-	-	-	447.804.800	agreement	
Pinjaman yang diberikan, pembiayaan dan piutang syariah	10.189.607.854	2.450.340.075	1.036.434.773	1.166.971.596	14.843.354.298	Loans, sharia financing and receivables	
Pendapatan bunga yang masih akan diterima	174.921.928	58.210.895	-	15.107.630	248.240.453	Interest receivables	
Penyertaan Saham	57.368.030	-	-	-	57.368.030	investment in share	
Aset lain-lain	<u>30.638.516</u>	-	-	-	<u>30.638.516</u>	Other assets	
Jumlah	18.786.163.426	2.508.550.970	1.051.703.501	2.187.091.344	24.533.509.241	Total	
Dikurangi: Cadangan kerugian penurunan nilai						Less: Allowance for impairment losses	
					<u>(617.814.473)</u>		
					<u>23.915.694.768</u>		

Dalam menentukan kualitas kredit berdasarkan segmen klien dipantau dan dianalisis berdasarkan hari tunggakan (*days past due*) dan kriteria kualitatif sebagaimana dijelaskan pada Catatan 2g.

Dalam hal terdapat keraguan terhadap kemampuan debitur untuk melakukan pembayaran kontraktual pada saat jatuh tempo, persyaratan kredit dapat dinegosiasikan kembali berdasarkan kesepakatan antara Grup dan debitur.

Dampak langsung dan tidak langsung atas pandemi COVID-19 mempengaruhi perekonomian global, pasar, dan pihak lawan maupun debitur dari Grup. Manajemen telah melakukan langkah-langkah untuk memitigasi dampak terhadap bisnis Bank sebagai berikut:

**46. RISK MANAGEMENT (continued)**

**Credit risk (continued)**

v. Quality of financial assets (continued)

In determining credit quality by client segment are monitored and analysed based on days past due and qualitative criteria as explained in Note 2g.

Where there is doubt on the ability of the debtors to meet contractual payments when due, the terms of the loans might be renegotiated based on mutual agreement between the Group and the debtors.

Direct and indirect effects of the COVID-19 outbreak are impacting the global economy, markets, and the counterparties and debtor of the Bank. Management has taking actions to mitigate the impacts on the Group's business as follow:

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko kredit (lanjutan)**

v. Kualitas aset keuangan (lanjutan)

- Mempersiapkan skema restrukturisasi/relaksasi kredit sementara untuk debitur yang terdampak COVID-19.
- Melakukan penyaluran pinjaman yang diberikan secara selektif dengan menerapkan prinsip kehati-hatian.
- Meningkatkan upaya penagihan dan penyelesaian kredit bermasalah.
- Melakukan efisiensi biaya operasional.
- Menerapkan manajemen risiko likuiditas secara optimum untuk menjaga posisi likuiditas Grup.

Manajemen juga melakukan analisa berdasarkan risiko atas sektor-sektor yang paling terkena dampak penurunan akibat COVID-19, dan melakukan review kualitatif atas perhitungan ECL terhadap sektor-sektor tersebut untuk meyakinkan bahwa ECL mencukupi.

Untuk debitur yang masih memiliki prospek usaha serta kemampuan membayar kewajiban, Grup dapat memberikan relaksasi kredit antara lain dalam bentuk perpanjangan tenor disesuaikan dengan siklus usaha debitur saat ini (pada umumnya untuk masa hingga 1 tahun). Sementara untuk debitur yang membutuhkan waktu pemulihan relatif lebih lama, dapat diberikan restrukturisasi kredit, antara lain dalam bentuk pemberian masa tenggang/ penundaan pembayaran dan/atau penurunan suku bunga.

Sampai dengan tanggal 31 Desember 2021 dan 2020, terdapat 469 dan 461 debitur dengan total pinjaman sebesar Rp5.820.252.266 dan Rp6.721.525.954 yang telah direstrukturisasi.

Manajemen telah berupaya untuk memperbaiki kualitas kredit Grup dan menjaga rasio NPL dibawah ketentuan maksimal yang dipersyaratkan oleh OJK dengan melakukan hal-hal sebagai berikut:

**46. RISK MANAGEMENT (continued)**

**Credit risk (continued)**

v. Quality of financial assets (continued)

- Establish various temporary credit restructuring/relaxation scheme for customers affected by COVID-19.
- Provide loans to customers selectively with prudent principles.
- Increase efforts on collections and settlements of non-performing loans.
- Manage operational expenses efficiently.
- Implement liquidity risk management optimally to secure the Group's liquidity position.

Management also performs a risk-based assessment of those sectors most impacted by the COVID-19 downturn, and performs a qualitative review of the ECL calculation associated with those sectors to ensure that overall ECL is sufficient.

For debtors who still have good business prospects and the ability to pay, the Group can provide loan relaxation, among others through tenor extension in accordance with the debtor's current business cycle cycle (generally for period up to 1 year). Meanwhile, for debtors who need relatively longer recovery time, its can be given loan restructuring, among others in the form of grace period/payment holiday and/or a reduction in interest rates.

As of December 31, 2021, there are 469 and 461 debtors with total outstanding loans of Rp5,820,252,266 and Rp6,721,525,954 respectively which have been restructured.

Management has made efforts to improve the quality of the Group's credit and maintain the NPL ratio below the maximum stipulated by the OJK by doing the following:



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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko kredit (lanjutan)**

v. Kualitas aset keuangan (lanjutan)

- Melakukan *cessie* pinjaman untuk debitur yang masuk ke dalam kategori pinjaman yang bermasalah;
- Mentransfer pinjaman untuk debitur yang masuk ke dalam kategori pinjaman yang bermasalah menjadi Aset Yang Diambil Alih ("AYDA") dengan mengambil alih agunan yang dijaminan oleh debitur;
- Membuat pembentukan cadangan kerugian penurunan nilai tambahan untuk pinjaman; dan
- Melakukan restrukturisasi pinjaman sesuai dengan ketentuan dari OJK.

Manajemen telah melakukan evaluasi dampak pandemi COVID-19 terhadap perhitungan kerugian kredit ekspektasian, antara lain penyesuaian terhadap kerugian kredit ekspektasian sepanjang umur aset keuangan (Stage 2). Mengingat model perhitungan kerugian kredit ekspektasian tidak sepenuhnya dapat menghasilkan estimasi kerugian yang akurat dalam kondisi ekonomi yang abnormal, maka Manajemen juga sudah memperhitungkan beberapa faktor penyesuaian untuk memastikan nilai kerugian kredit ekspektasian yang diakui dalam laporan keuangan dinyatakan secara wajar. Dalam menilai kondisi masa depan, manajemen telah mempertimbangkan berbagai informasi relevan yang tersedia, termasuk kebijakan COVID-19 yang dikeluarkan oleh pemerintah untuk mendukung dan mengurangi dampak penyebaran COVID-19 terhadap perekonomian, dan mendorong Bank untuk menunda atau merestrukturisasi pinjaman. Dalam kondisi normal, penjadwalan ulang atau restrukturisasi pinjaman akan menunjukkan peningkatan risiko kredit yang signifikan dan pindah ke Stage 2. Namun, dalam kondisi saat ini, manajemen telah mempertimbangkan bahwa restrukturisasi atau peristiwa tidak secara otomatis memicu peningkatan risiko kredit yang signifikan jika debitur diharapkan untuk memulihkan dan memenuhi kewajiban kontraktual mereka setelah akhir periode restrukturisasi atau relaksasi.

**46. RISK MANAGEMENT (continued)**

**Credit risk (continued)**

v. Quality of financial assets (continued)

- Conduct a loan *cessie* for debtors who fall into the non-performing loan category;
- Transferring loans for debtors that are categorised as non-performing loans into Foreclosed Assets ("AYDA") by taking over the collateral guaranteed by the debtor;
- Create an additional allowance for impairment losses for loans; and
- Performed loan restructuring in accordance with the provisions of the OJK.

Management has evaluated the impact of the COVID-19 pandemic on calculating expected credit loss, including adjustments to expected credit losses over the life of the financial assets (Stage 2). Considering that the expected credit loss calculation model cannot produce an accurate estimation of losses in abnormal economic conditions, Management has also taken into account several adjustment factors to ensure the expected value of the expected credit loss recognised in the financial statements is stated fairly. In assessing future conditions, management has considered various relevant information available, including COVID-19 policies issued by the government to support and mitigate the impact of the spread of COVID-19 on the economy, and encouragement for banks to defer or restructure loans. Under normal conditions, a rescheduling or restructuring of a loan would indicate a significant increase in credit risk and a move to Stage 2. However, in the current condition, management has considered that such a restructuring or event was not automatically trigger a significant increase in credit risk if the debtor would be expected to recover and fulfill their contractual obligations after the end of the restructuring or relaxation period.

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko kredit (lanjutan)**

v. Kualitas aset keuangan (lanjutan)

**Asumsi dan pertimbangan utama dalam menentukan kerugian kredit ekspektasian**

***Lifetime***

Kerugian kredit ekspektasian diestimasi berdasarkan periode dimana Bank terpapar pada risiko kredit. Bank memiliki proses review dari setiap model bisnis/produknya. Baik kredit *revolving* maupun *non-revolving*, untuk menghitung kerugian kredit ekspektasian menggunakan jangka waktu kontraktual sesuai dengan jangka waktu kontraknya. Penetapan periode tersebut khususnya untuk kredit revolving dilakukan dengan mempertimbangkan kondisi dimana proses perpanjangan kredit revolving yang diberikan oleh Bank dilakukan melalui kajian yang *robust* yaitu melalui evaluasi yang substantif dibandingkan administratif.

**Variabel Makro Ekonomi (“MEV”)**

Lingkungan ekonomi yang berkembang adalah penentu utama dari kemampuan nasabah Bank untuk memenuhi kewajiban mereka saat jatuh tempo. Ini adalah prinsip dasar PSAK 71 bahwa potensi kerugian kredit di masa depan harus bergantung tidak hanya pada kesehatan ekonomi saat ini, tetapi juga harus memperhitungkan kemungkinan perubahan pada lingkungan ekonomi. Misalnya, jika Bank mengantisipasi perlambatan tajam dalam ekonomi dunia, Bank harus membentuk lebih banyak cadangan hari ini untuk menyerap kerugian kredit yang kemungkinan akan terjadi dalam waktu dekat.

Untuk menangkap efek perubahan pada lingkungan ekonomi, model PD digunakan untuk menghitung kerugian kredit ekspektasian, dengan memasukkan informasi *forward looking* dalam bentuk perkiraan nilai-nilai variabel ekonomi yang kemungkinan akan berdampak pada kemampuan pembayaran kembali nasabah Bank.

Berbagai MEV digunakan untuk setiap model PD, tergantung pada hasil analisis statistik kesesuaian MEV dengan PD serta konsensus dari pakar kredit. Diantaranya adalah Indeks barang konsumtif, Inflasi, dan GDP Nasional.

**46. RISK MANAGEMENT (continued)**

**Credit risk (continued)**

v. Quality of financial assets (continued)

**Key assumptions and judgments in determining expected credit loss**

***Lifetime***

*Expected credit loss is estimated based on the period over which the Bank is exposed to credit risk. The Bank has a review process for each of its business models/products. Both revolving and non-revolving loans, to calculate expected credit losses using the contractual term in accordance with the contract period. Determination of this period, especially for revolving credit, is carried out by taking into account the conditions in which the Bank carries out the process of extending revolving credit through a robust study, namely through a substantive compared to administrative evaluation.*

**Macro Economic Variable (“MEV”)**

*The developing economic environment is the key determinant of the ability of a Bank’s customer to meet their obligations as they fall due. It is a fundamental principle of SFAS 71 that the potential future credit losses should depend not just on the health of the economy today, but should also take into account potential changes to the economic environment. For example, if the Bank was to anticipate a sharp slowdown in the world economy, Bank should make more provisions today to absorb the credit losses likely to occur in the near future.*

*To capture the effect of changes to the economic environment, PD model is used to calculate expected credit loss, by incorporating forward-looking information in the form of forecasts of the values of economic variables that are likely to have an effect on the repayment ability of the Bank’s customer.*

*Various of MEVs are used for each PD model, depending on the statistical analysis result of appropriateness of the MEV with PD as well as consensus from credit expert. Amongst others are Consumer Goods Index, Inflation and National GDP.*

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko kredit (lanjutan)**

v. Kualitas aset keuangan (lanjutan)

**Asumsi dan pertimbangan utama dalam menentukan kerugian kredit ekspektasian (lanjutan)**

**Sensitivitas MEV terhadap ECL**

Perhitungan ECL bergantung pada beberapa variabel dan pada dasarnya tidak linier dan tergantung pada portofolio, yang menyiratkan bahwa tidak ada analisis tunggal yang dapat sepenuhnya menunjukkan sensitivitas kerugian kredit ekspektasian terhadap perubahan dalam MEV. Bank berkeyakinan bahwa sensitivitas harus dilakukan terhadap seluruh variabel, alih-alih variabel tunggal, karena hal ini sejalan dengan sifat multi-variabel dari perhitungan ECL.

Analisis sensitivitas ECL dilakukan untuk mengeksplorasi efek dari pandemi global COVID-19 yang menyebabkan perlambatan ekonomi Indonesia.

**Risiko pasar**

Risiko pasar adalah risiko pada laporan posisi keuangan konsolidasian dan rekening administratif termasuk transaksi derivatif, akibat perubahan secara keseluruhan dari kondisi pasar, termasuk risiko perubahan harga opsi. Risiko pasar meliputi, antara lain, risiko tingkat suku bunga, risiko nilai tukar, risiko ekuitas dan risiko komoditas. Risiko tingkat suku bunga, risiko nilai tukar dan risiko komoditas dapat berasal baik dari posisi *trading book* maupun posisi *banking book*, sedangkan risiko ekuitas berasal dari posisi *trading book*. *Assets & Liabilities Committee* (ALCO) merupakan komite yang membantu Direksi dalam mengawasi dan mengelola risiko pasar.

Risiko pasar melekat pada aktivitas fungsional Grup seperti kegiatan *treasury* dan investasi dalam bentuk efek-efek dan pasar uang maupun penyertaan pada lembaga keuangan lainnya, penyediaan dana dan pinjaman, kegiatan pendanaan dan penerbitan surat utang, serta kegiatan pembiayaan perdagangan. Untuk itu, Grup harus dan selalu melakukan identifikasi dan pemantauan dari waktu ke waktu untuk mengantisipasi adanya risiko pasar. LFR (*Loan to Funding Ratio*) Bank pada tanggal 31 Desember 2021 dan 2020 masing-masing adalah sebesar 79,89% dan 75,38%.

**46. RISK MANAGEMENT (continued)**

**Credit risk (continued)**

v. Quality of financial assets (continued)

**Key assumptions and judgments in determining expected credit loss (continued)**

**Sensitivity of MEV to ECL**

The ECL calculation relies on multiple variables and is inherently non-linear and portfolio-dependent, which implies that no single analysis can fully demonstrate the sensitivity of the expected credit loss to changes in the MEVs. The Bank believes that sensitivity should be performed to all variables, instead of single variable, as this aligns with the multi-variable nature of the ECL calculation.

A sensitivity analysis of ECL was undertaken to explore the effect of the global COVID-19 pandemic that leads to Indonesia economy slowdown.

**Market risk**

Market risk is the risk on the consolidated statements of financial position and administrative accounts, including derivative transactions, due to overall changes in market conditions, including the risk of change of option price. Market risk include, among others, interest rate risk, foreign exchange risk, equity risk and commodity risk. Interest rate risk, foreign exchange risk and commodity risk can come from trading book and banking book, whereas equity risk come from trading book. *Assets & Liabilities Committee* (ALCO) is a committee assisting Directors in monitoring and maintaining market risk.

Market risk is adhered on functional activities of the Group such as treasury activity and investment in securities and money market or investment in other financing institution, funding and lending, funding activity and issued obligation and financing trading activity. The Group must and always identify and monitor from time to time to anticipate the market risk. The Loan to Funding Ratio (LFR) of the Bank as of December 31, 2021 and 2020 are 79.89% and 75.38%, respectively.

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko pasar (lanjutan)**

Tujuan dari manajemen risiko pasar adalah untuk melakukan identifikasi, pengukuran, pengendalian, dan pengelolaan eksposur risiko pasar dalam parameter yang dapat diterima, serta memaksimalkan tingkat pengembalian. Hal ini dilakukan melalui kebijakan yang komprehensif dan kerangka limit untuk mengidentifikasi, mengukur dan memonitor nilai risiko berdasarkan tingkat risiko yang akan diambil (*risk appetite*) oleh Grup.

Dalam melakukan pengukuran risiko pasar, Grup menggunakan perhitungan Metode Standar untuk menghitung Kewajiban Penyediaan Modal Minimum (KPMM) untuk risiko pasar.

Risiko tingkat suku bunga

Risiko tingkat suku bunga timbul dari adanya kemungkinan bahwa perubahan tingkat suku bunga akan mempengaruhi arus kas masa depan dari nilai wajar instrumen keuangan.

Dalam rangka meminimalkan risiko tingkat suku bunga, Grup melakukan upaya-upaya sebagai berikut, antara lain:

- Meningkatkan fungsi dan peran *Assets & Liabilities Committee* (ALCO) dalam rangka identifikasi dan penetapan tingkat suku bunga pinjaman dan dana pihak ketiga untuk mengantisipasi fluktuasi suku bunga pasar.
- Penerapan Kebijakan *Assets & Liabilities Management* (ALMA) untuk pihak berelasi dalam penerapan manajemen risiko Grup dan merupakan salah satu pedoman bagi unit kerja *Treasury* dalam melakukan transaksi di pasar uang dan pasar modal seperti:
  - i. Melakukan identifikasi risiko tingkat suku bunga yang berasal dari transaksi dan portofolio Grup pada Efek-efek;
  - ii. Penetapan sistem pengukuran risiko tingkat suku bunga dengan menggunakan *gap analysis* atau *duration analysis*; dan
  - iii. Strategi penanaman dana dan strategi pengumpulan dana.

**46. RISK MANAGEMENT (continued)**

**Market risk (continued)**

*The objective of market risk management is to identify, measure, control, and manage market risk exposures within acceptable parameters, while optimising the returns. This is done through a comprehensive policy and limit framework to identify, measure, and monitor the amount of risk based on risk appetite of the Group.*

*In measuring market risk, the Group uses the Standardised Method in calculating Capital Adequacy Ratio (CAR) for market risk.*

Interest rate risk

*Interest rate risk arise from the possibility that changes in interest rates will affect future cash flows or the fair values of financial instruments.*

*To minimise interest rate risk, the Group makes the following efforts, among others:*

- *Increasing function and role of Assets & Liabilities Committee (ALCO) in identifying and determining interest rate and third party funds to anticipate fluctuations in market interest rate.*
- *Application of Assets & Liabilities Management's (ALMA) policy to related parties in application of risk management of the Group and it is one of a guidance for Treasury working unit in money market and capital market transactions such as:*
  - i. Identifying interest rate risk from transaction and Group's portfolio of securities;*
  - ii. Determining measuring system of interest rate risk using gap analysis or duration analysis; and*
  - iii. Strategies of investment and collection of funds.*

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko pasar (lanjutan)**

Risiko tingkat suku bunga (lanjutan)

Tabel berikut merupakan kisaran tingkat suku bunga kontraktual per tahun untuk aset dan liabilitas keuangan yang signifikan untuk tahun yang berakhir pada tanggal 31 Desember 2021 dan 2020:

	<u>31 Desember/ December 31,</u>	
	<u>2021</u>	<u>2020</u>
Aset		
Giro pada bank lain	0,00% - 2,00%	0,00% - 2,00%
Penempatan pada		
Bank Indonesia dan bank lain	0,05% - 3,50%	3,82% - 7,25%
Efek-efek	4,88% - 10,30%	3,75% - 10,30%
Efek-efek yang dibeli dengan janji dijual kembali	3,50%	3,75%
Pinjaman yang diberikan, pembiayaan dan piutang syariah	5,00% - 40,48%	5,00% - 38,09%
Liabilitas		
Simpanan nasabah	0,00% - 8,00%	0,00% - 9,50%
Simpanan dari bank lain	0,50% - 5,50%	0,00% - 7,00%
Efek-efek yang diterbitkan	10,30% - 11,75%	9,70% - 11,75%

Sensitivitas terhadap laba bersih

Tabel di bawah ini mengikhtisarkan sensitivitas laba bersih Grup pada tanggal 31 Desember 2021 dan 2020 atas perubahan tingkat suku bunga:

	<u>2021</u>	
	<u>Peningkatan dalam 100 basis poin/ Increase by 100 basis point</u>	<u>Penurunan dalam 100 basis poin/ Decrease by 100 basis point</u>
Pengaruh terhadap laba bersih	<u>16.122.100</u>	<u>(16.122.100)</u>
	<u>2020</u>	
	<u>Peningkatan dalam 100 basis poin/ Increase by 100 basis point</u>	<u>Penurunan dalam 100 basis poin/ Decrease by 100 basis point</u>
Pengaruh terhadap laba bersih	<u>17.906.404</u>	<u>(17.906.404)</u>

**46. RISK MANAGEMENT (continued)**

**Market risk (continued)**

Interest rate risk (continued)

The following table summarises the range of contractual interest rates per annum for significant financial assets and liabilities for the years ended December 31, 2021 and 2020:

Assets
Current accounts with other banks
Placements with Bank Indonesia and other banks
Marketable securities
Securities purchased under resale agreements
Loans, sharia financing and receivables
Liabilities
Deposits from customers
Deposits from other banks
Securities issued

Sensitivity to net income

The following table summarises the sensitivity of Group's net income to movement of interest rates on December 31, 2021 and 2020:

Impact to net income

Impact to net income

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko pasar (lanjutan)**

Risiko tingkat suku bunga (lanjutan)

Proyeksi di atas mengasumsikan bahwa tingkat suku bunga bergerak pada jumlah yang sama, sehingga tidak mencerminkan pengaruh potensial laba atas perubahan beberapa tingkat suku bunga sementara yang lainnya tidak berubah. Proyeksi juga mengasumsikan bahwa seluruh variabel lainnya adalah konstan dan berdasarkan tanggal pelaporan yang konstan serta seluruh posisi hingga jatuh tempo.

Risiko mata uang

Grup memiliki eksposur risiko mata uang akibat adanya transaksi dalam valuta asing. Grup memonitor risiko konsentrasi yang terjadi untuk setiap valuta sehubungan dengan penjabaran transaksi dalam valuta asing ke dalam aset dan liabilitas moneter dalam Rupiah.

Pengelolaan posisi valuta asing Bank dilakukan dengan cara mengendalikan Posisi Devisa Neto ("PDN") Bank secara keseluruhan.

**46. RISK MANAGEMENT (continued)**

**Market risk (continued)**

Interest rate risk (continued)

The projection above assumes that interest rates of all maturities move by the same amount and, therefore, do not reflect the profit potential impact on the changes of some interest rates while others remain unchanged. The projections also assume that all other variables are held constant and based on a constant reporting date position and that all positions run to maturity.

Currency risk

The Group is exposed to currency risk through transaction in foreign currencies. The Group monitors any concentration risk in relation to any individual currency in regard to the translation of foreign currency transactions into monetary assets and liabilities in Rupiah.

The Bank's foreign currency position management is conducted by managing the Bank's overall Net Open Position ("NOP").

<b>31 Desember/ December 31, 2021</b>				
<b>Valuta</b>	<b>Aset/ Assets</b>	<b>Liabilitas/ Liabilities</b>	<b>Posisi Devisa Neto (nilai absolut)/ Net Open Position (absolute amount)</b>	<b>Currencies</b>
Keseluruhan (laporan posisi Keuangan dan rekening administratif)				<i>Aggregate (statements of financial position and administrative accounts)</i>
Dolar Amerika Serikat	838.738.888	863.255.489	24.516.601	<i>United States Dollar</i>
Yen Jepang	3.026.940	2.335.911	691.029	<i>Japanese Yen</i>
Euro Eropa	1.047.029	782.922	264.107	<i>European Euro</i>
Dolar Singapura	501.160	786.426	285.266	<i>Singapore Dollar</i>
Yuan China	84.702	-	84.702	<i>Chinese Yuan</i>
Ringgit Malaysia	99.058	-	99.058	<i>Malaysian Ringgit</i>
Dolar Australia	36.213	-	36.213	<i>Australian Dollar</i>
Dolar Taiwan	35.053	-	35.053	<i>New Taiwan Dollar</i>
Dolar New Zealand	25.596	-	25.596	<i>New Zealand Dollar</i>
Dolar Hongkong	25.336	-	25.336	<i>Hongkong Dollar</i>
Won Korea	17.131	-	17.131	<i>Korean Won</i>
Poundsterling Inggris	7.508	-	7.508	<i>Great Britain Poundsterling</i>
Baht Thailand	3.085	-	3.085	<i>Thailand Baht</i>
Riyal Arab Saudi	1.879	-	1.879	<i>Saudi Arabian Riyal</i>
<b>Total</b>			<b>26.092.564</b>	<b>Total</b>
Jumlah ekuitas			<b>2.659.889.413</b>	<i>Total equity</i>
<b>Rasio PDN</b>			<b>0,98%</b>	<b>NOP Ratio</b>

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko likuiditas**

Risiko likuiditas merupakan risiko akibat ketidakmampuan Grup memenuhi kewajiban yang jatuh tempo dari sumber pendanaan arus kas dan/atau dari aset likuid berkualitas tinggi yang dapat diagunkan, tanpa mengganggu aktivitas dan kondisi keuangan Grup. Ketidakmampuan memperoleh sumber pendanaan arus kas sehingga menimbulkan risiko likuiditas dapat disebabkan antara lain oleh:

- a. Ketidakmampuan menghasilkan arus kas yang berasal dari aset produktif maupun yang berasal dari penjualan aset termasuk aset likuid; dan/atau
- b. Ketidakmampuan menghasilkan arus kas yang berasal dari penghimpunan dana dan transaksi antar Grup.

Risiko likuiditas berhubungan dengan adanya kemungkinan Grup tidak dapat memenuhi kewajibannya terhadap deposan, investor atau kreditur yang diantaranya disebabkan dari keterbatasan akses pendanaan atau ketidakmampuan Grup untuk melikuidasi aset yang dimiliki dengan harga yang wajar. *Assets and Liabilities Committee (ALCO)* merupakan komite yang membantu Direksi dalam mengawasi dan mengelola risiko likuiditas.

Secara umum, tujuan utama manajemen risiko untuk risiko likuiditas adalah untuk meminimalkan kemungkinan ketidakmampuan Grup dalam memperoleh sumber pendanaan arus kas. Dengan demikian Grup dapat memenuhi setiap kewajiban finansial yang sudah diperjanjikan secara tepat waktu, dan agar senantiasa dapat memelihara tingkat likuiditas yang memadai dan optimal.

Kebijakan pengelolaan risiko likuiditas antara lain mencakup pengawasan aktif Dewan Komisaris dan Direksi, yang pada intinya mengatur penerapan Manajemen Risiko likuiditas pada Grup, Kebijakan Manajemen Risiko likuiditas yang secara umum mencakup strategi manajemen risiko likuiditas, tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) dan Sistem Informasi Manajemen Risiko serta Sistem Pengendalian Internal dengan menerapkan pengendalian internal dan kaji ulang independen yang memadai terhadap penerapan Manajemen Risiko untuk Risiko likuiditas yang dilaksanakan oleh Satuan Kerja Audit Internal (SKAI) dan Satuan Kerja Manajemen Risiko (SKMR).

**46. RISK MANAGEMENT (continued)**

**Liquidity risk**

*Liquidity risk is the risk arising from the inability of the Group to meet the maturing obligations from cash flow funding sources and/or from high-quality liquid assets that can be pledged, without disturbing the activities and financial condition of the Group. The inability to obtain funding for cash flows resulting to liquidity risk can be contributed by:*

- a. *Inability to generate cash flows from productive assets as well as from the sale of assets, including liquid assets; and/or*
- b. *Inability to generate cash flows from funding and intergroup transactions.*

*Liquidity risk related with the possibility of Group's inability to meet the maturing obligations to its customers, investors or creditors in which due to the limitation of funding line or inability of the Group to liquidate its assets with the fair value. Assets and Liabilities Committee (ALCO) is a committee under Director who monitor and manage liquidity risk.*

*In general, the main purpose of liquidity risk management is to minimise the possibility of the Group's inability to obtain sources of financing. Thus the Group can fulfill any financial obligations as they fall due in a timely manner, and in order to maintain an adequate and optimal level of liquidity.*

*Liquidity risk management policies include the active supervision of the Board of Commissioners and Board of Directors, which basically set the implementation of the Group's Liquidity Risk Management, Liquidity Risk Management Policy which generally include liquidity risk management strategy, the level of risk to be taken (risk appetite) and risk tolerance (risk tolerance) and Information Systems Risk Management and Internal Control System by implementing internal control and review of appropriate independent of the implementation of Risk Management for liquidity risk is carried out by the Internal Audit (SKAI) and Risk Management Unit (SKMR).*



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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko likuiditas (lanjutan)**

Tujuan dari manajemen risiko likuiditas adalah untuk memastikan bahwa setiap kebutuhan dana di saat ini maupun di masa datang baik untuk kondisi normal maupun kondisi stres dapat dipenuhi.

Grup mengelola risiko likuiditas melalui analisis perbedaan jatuh tempo likuiditas dan rasio-rasio likuiditas. Risiko likuiditas diukur dan dipantau secara harian berdasarkan kerangka kerja limit risiko likuiditas. Analisis kesenjangan likuiditas memberikan pandangan terhadap ketidaksesuaian arus kas masuk dengan arus kas keluar pada waktu tertentu. Kondisi ini dikelola secara terpusat oleh Tresuri yang mempunyai akses dan otorisasi secara langsung ke *interbank market*, *wholesale* dan *professional market* lainnya, dalam upaya membantu aktivitas utama bisnis Grup seperti pengumpulan dana dan pemberian pinjaman.

Langkah yang diambil oleh Grup sehubungan dengan perbedaan antara aset dan liabilitas keuangan yang jatuh tempo antara 1 (satu) sampai dengan 3 (tiga) bulan, adalah meningkatkan pelayanan kepada nasabah simpanan, memantau perpanjangan simpanan, mencari nasabah baru serta menawarkan produk dan bunga yang menarik kepada nasabah untuk menjaga stabilitas dan kontinuitas jumlah simpanan dari nasabah. Di samping itu, Grup juga mengintensifkan usaha penagihan kepada debitur bermasalah dan menempatkan kelebihan dana pada efek-efek yang memiliki pasar sehingga dapat dicairkan setiap saat apabila Grup membutuhkan dana.

Tabel jatuh tempo berikut ini menyajikan informasi mengenai perkiraan jatuh tempo dari liabilitas sesuai arus kas kontraktual yang tidak didiskontokan tanggal 31 Desember 2021 dan 2020:

		31 Desember/ December 31, 2021						
		Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ No contractual maturity/ Repayable on demand	≤ 1 bulan/ ≤ 1 month	> 1 bulan- 3 bulan/ > 1 month - 3 months	> 3 bulan- 1 tahun/ > 3 months - 1 year	> 1 - 5 tahun/ > 1 - 5 years	Lebih dari 5 tahun/ More than 5 years	
Jumlah/ Total								
<b>Liabilitas</b>								<b>Liabilities</b>
Liabilitas segera	335.926	-	335.926	-	-	-	-	Obligations due immediately
Simpanan nasabah	18.185.521.475	-	11.711.555.320	5.006.246.957	1.467.562.335	156.863	-	Deposits from customers
Simpanan dari bank lain	1.039.682.992	-	1.001.704.807	34.901.699	3.076.486	-	-	Deposits from other banks
Efek-efek yang diterbitkan	1.807.161.181	-	-	-	316.480.000	1.394.737.431	95.943.750	Securities issued
Pinjaman yang diterima	50.074.028	-	50.074.028	-	-	-	-	Borrowings
Liabilitas lain-lain	69.397.205	-	55.197.655	859.035	9.356.610	3.983.905	-	Other liabilities
	<b>21.152.172.807</b>	<b>-</b>	<b>12.818.867.736</b>	<b>5.042.007.691</b>	<b>1.796.475.431</b>	<b>1.398.878.199</b>	<b>95.943.750</b>	

**46. RISK MANAGEMENT (continued)**

**Liquidity risk (continued)**

The objective of liquidity risk management is to ensure that current and future fund requirements can be met both in normal or stress condition.

The Group manages liquidity risk through liquidity gap analysis and liquidity ratios. Liquidity risk is measured and monitored on a daily basis based on liquidity risk limit framework. Liquidity gap analysis provides insight as to the mismatch of expected cash inflows against cash outflows on any given day. This is centrally managed within Treasury which has direct and authorised access to interbank, wholesale and other professional markets, to supplement core Group activities such as deposit taking and lending.

The steps taken by the Group in connection with the maturity gap mismatch between its financial assets and liabilities due in 1 (one) to 3 (three) months such as improving its services to customers, monitor the extension of deposit, search for new customers and offering services including attractive products and interest rates in order to maintain stability and continuity of deposits from customers. In addition, the Group also intensify collection efforts from non-performing debtors and placing excess funds on marketable securities so they can be withdrawn at any time as the Group needs a fund.

The maturity tables below provide information about maturities on contractual undiscounted cash flows of liabilities on December 31, 2021 and 2020:

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**46. MANAJEMEN RISIKO (lanjutan)**

**46. RISK MANAGEMENT (continued)**

**Risiko likuiditas (lanjutan)**

**Liquidity risk (continued)**

		31 Desember/ December 31, 2020						
		Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ No contractual maturity/ Repayable on demand	> 1 bulan- 3 bulan/ > 1 month 3 months	> 3 bulan- 1 tahun/ > 3 months 1 year	> 1 - 5 tahun/ > 1 - 5 years	Lebih dari 5 tahun/ More than 5 years		
		Jumlah/ Total	≤ 1 bulan/ ≤ 1 month					
<b>Liabilitas</b>							<b>Liabilities</b>	
Liabilitas segera	2.086.598	-	2.086.598	-	-	-	Obligations due immediately	
Simpanan nasabah	18.506.586.099	-	10.170.543.416	5.640.454.839	2.695.587.844	-	Deposits from customers	
Simpanan dari bank lain	2.073.184.989	-	2.047.111.324	22.038.335	4.035.330	-	Deposits from other banks	
Efek-efek yang diterbitkan	2.166.774.931	-	-	-	209.051.250	1.191.115.000	Securities issued	
Liabilitas lain-lain	160.672.869	-	129.567.027	-	5.377.737	25.728.105	Other liabilities	
	<b>22.909.305.486</b>	<b>-</b>	<b>12.349.308.365</b>	<b>5.662.493.174</b>	<b>2.914.052.161</b>	<b>1.216.843.105</b>	<b>766.608.681</b>	

Tabel berikut ini menyajikan informasi mengenai perkiraan *cash outflow* dari rekening administratif pada tanggal 31 Desember 2021 dan 2020:

The tables below provide information about estimated cash outflow of off-balance sheet as of December 31, 2021 and 2020:

		31 Desember/ December 31, 2021						
		Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ No contractual maturity/ Repayable on demand	Kurang dari/ Less than 1 bulan/month	1 - 3 bulan/ months	3 - 12 bulan/ months	1 - 5 tahun/ years	Lebih dari 5 tahun/ More than 5 years	
		Jumlah/ Total						
Fasilitas pinjaman yang belum digunakan	3.288.587.205	-	543.441.991	396.784.449	2.248.397.095	99.963.670	-	Unused loan facilities
Letter of credit	2.523.379	-	-	-	-	2.523.379	-	Letter of credits
Garansi yang diberikan	368.041.258	-	8.485.000	61.191.191	293.292.520	5.072.547	-	Guarantees issued
	<b>3.659.151.842</b>	<b>-</b>	<b>551.926.991</b>	<b>457.975.640</b>	<b>2.541.689.615</b>	<b>107.559.596</b>	<b>-</b>	

		31 Desember/ December 31, 2020						
		Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ No contractual maturity/ Repayable on demand	Kurang dari/ Less than 1 bulan/month	1 - 3 bulan/ months	3 - 12 bulan/ months	1 - 5 tahun/ years	Lebih dari 5 tahun/ More than 5 years	
		Jumlah/ Total						
Fasilitas pinjaman yang belum digunakan	2.479.966.445	-	537.357.689	289.009.792	1.590.816.708	62.782.256	-	Unused loan facilities
Letter of credit	1.760.979	-	-	-	-	1.760.979	-	Letter of credit
Garansi yang diberikan	366.741.817	-	52.865.844	10.467.287	20.045.000	285.124.665	-	Guarantees issued
	<b>2.850.230.220</b>	<b>-</b>	<b>590.223.533</b>	<b>299.477.079</b>	<b>1.610.861.708</b>	<b>349.667.900</b>	<b>-</b>	

**Risiko operasional**

**Operational risk**

Risiko operasional adalah risiko kerugian yang langsung ataupun tidak langsung yang terjadi karena tidak memadainya atau karena adanya kegagalan proses internal, kesalahan manusia, kegagalan sistem, dan/atau adanya kejadian-kejadian eksternal yang mempengaruhi operasional Grup.

Operational risk is the risk of direct or indirect loss resulting from inadequate or failure in internal processes, people and systems and/or from external problems that affect the Group's operations.

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko operasional (lanjutan)**

Risiko ini melekat dalam semua proses bisnis, kegiatan operasional, sistem dan produk Grup, dari mulai Kantor Pusat sampai Kantor Kas. Kegagalan mengelola risiko operasional dapat menyebabkan kerugian keuangan, keselamatan karyawan dan reputasi Grup hingga akhirnya mempengaruhi kecukupan modal Grup. Tujuan Grup dalam mengelola risiko operasional adalah meminimalisasi dampak kegagalan/ketidakcukupan proses internal, faktor manusia, sistem atau kejadian-kejadian eksternal yang dapat mempunyai dampak kerugian.

Grup menerapkan manajemen risiko operasional dengan sasaran memastikan bahwa Grup telah melakukan proses manajemen risiko yang meliputi identifikasi, penilaian, pengkajian, mitigasi risiko serta dilakukan pengawasan dan pelaporan atas pelaksanaannya. Hal tersebut dilakukan dengan tujuan akhir memaksimalkan *benefit* dari suatu produk/layanan atau proses transaksi/aktivitas dengan potensi atas risiko operasional yang telah diperhitungkan.

Proses pengkajian risiko dilakukan untuk menilai kecukupan pengendalian internal serta proses identifikasi dan penelaahan risiko untuk setiap proses dan produk di masing-masing unit kerja untuk memastikan kepatuhan terhadap kebijakan, peraturan dan batasan-batasan yang dibuat oleh manajemen Grup. Pengelolaan risiko operasional juga dilakukan dengan memperkuat aspek keamanan dan kehandalan operasi dari teknologi informasi sehingga kesalahan manusia, *fraud*, kesalahan proses dan potensi kegagalan sistem yang dapat menyebabkan terganggunya kelangsungan bisnis dapat ditekan dan diantisipasi lebih dini.

Dalam pemantauan risiko operasional, fungsi Satuan Kerja Audit Internal (SKAI) melaksanakan penilaian terhadap penerapan kebijakan dan prosedur manajemen risiko pada setiap aktivitas fungsional, produk atau layanan baru dan Satuan Kerja Manajemen Risiko (SKMR) memastikan proses identifikasi, pengukuran, pemantauan dan pengendalian risiko berjalan dengan efektif pada setiap aktivitas fungsional, produk atau layanan baru.

Pengawasan oleh Dewan Komisaris dan Direksi Grup atas profil risiko Grup dan pelaksanaan manajemen risiko dilakukan melalui rapat yang dilakukan secara berkala dengan jadwal yang telah ditentukan.

**46. RISK MANAGEMENT (continued)**

**Operational risk (continued)**

*This type of risk is inherent in all business processes, operational activities, systems and products of the Group, from Head Office to Cash Office. Failure to manage operational risks properly could lead to financial losses, loss of employee safety, and reputation of the Group until affected capital adequacy of the Group. The Group's objective in managing operational risk is to minimise the impact of the failure of/inadequate internal process, people, system or from external events, which could have financial loss impact.*

*The Group applies the operational risk management with the main target to ensure that the Group has conducted a risk management process that includes risk identification, risk assessment, risk evaluation, risk mitigation and conducted monitoring and reporting on implementation. This is done with the ultimate target to maximise the benefits of a product/service or process transactions/activities with potential operational risks that have been taken into account.*

*A risk assessment process is carried out to evaluate the adequacy of internal control and risk identification and assessment in every process and product in each working unit to ensure compliance with the policies, rules and limits set down by the Group's management. Operational risk management is also performed by strengthening security and operational aspects of information technology so that human error, fraud, processing errors and system failure that can affect business continuity can be anticipated and reduced.*

*In monitoring operational risk, the Internal Audit (SKAI) conducted an assessment of the implementation of risk management policies and procedures in each functional activity, new products or services and Risk Management Unit (SKMR) function ensures the identification, measurement, monitoring and risk control work effectively on any functional activity, new products or services.*

*Monitoring by the Group's Boards of Commissioners and Director actively monitor of the Group's risk profile and its risk management implementation through meeting that are conducted regularly.*

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko operasional (lanjutan)**

Selain kebijakan dan metode tersebut di atas, Grup juga telah menerapkan upaya yang terus menerus dikembangkan untuk membangun lingkungan budaya yang mendukung pelaksanaan manajemen risiko operasional. Hal tersebut dilakukan melalui penguatan pada tiga lini pertahanan (*three line of defense*) yaitu pemberdayaan unit bisnis sebagai lini pertahanan pertama, pembentukan fungsi manajemen risiko operasional sebagai lini pertahanan kedua dan koordinasi kerja dengan Internal Audit (SKAI) sebagai lini pertahanan ketiga.

**Risiko hukum**

Risiko hukum adalah risiko akibat tuntutan hukum dan/atau kelemahan aspek yuridis. Kelemahan aspek yuridis tersebut antara lain disebabkan adanya ketiadaan peraturan perundang-undangan yang mendukung atau kelemahan perikatan seperti tidak dipenuhinya syarat sahnya kontrak dan pengikatan dokumen yang tidak sempurna.

Sebagai sebuah perusahaan yang berdiri dalam yuridiksi hukum Indonesia, Grup harus selalu tunduk terhadap segala peraturan hukum yang dikeluarkan oleh regulator industri perbankan di Indonesia. Selain itu, Grup juga harus mengikuti segala bentuk peraturan perundangan yang berlaku di masyarakat baik yang terkait secara langsung maupun tidak langsung dengan kegiatan usaha Grup. Kegagalan Grup dalam mengikuti peraturan hukum yang berlaku dapat mengakibatkan pada timbulnya tuntutan hukum yang akan ditujukan kepada Grup. Apabila tuntutan-tuntutan hukum yang diajukan kepada Grup memiliki nilai yang material, maka hal tersebut dapat memberikan dampak secara langsung terhadap kinerja keuangan Grup.

Grup melaksanakan identifikasi risiko hukum berdasarkan beberapa faktor-faktor yang meliputi tuntutan hukum, tidak adanya peraturan regulasi hukum yang mendukung, dan kelemahan perjanjian. Pengendalian risiko hukum dilakukan Grup dengan memastikan bahwa seluruh kegiatan dan hubungan kerja dengan pihak ketiga telah didasarkan pada aturan maupun persyaratan yang dapat melindungi kepentingan Grup dari segi hukum termasuk antisipasi terhadap potensi tuntutan dari pihak eksternal.

Untuk memitigasi risiko hukum yang mungkin timbul akibat tuntutan hukum atau kelemahan dari aspek hukum, Grup memiliki Biro Hukum. Biro tersebut memiliki peranan:

**46. RISK MANAGEMENT (continued)**

**Operational risk (continued)**

*Other than policy and the above mentioned method, the Group has continued developing its culture and support the implementation for operational risk. The three line of defense implementation, which consist of unit business as the first line of defense, establishment of operational risk management as second line of defense and coordination with Internal Audit (SKAI) as third line of defense.*

**Legal risk**

*Legal risk is the risk related to legal claims and/or weaknesses in the legal aspect. Such weaknesses in legal aspect is caused, among others, by the lack of the supporting legislation or the weaknesses of contracts such as incomplete requirements for a valid contract and imperfect document contract.*

*As an entity which is governed by the laws of the Republic of Indonesia, the Group should always comply with all such laws and regulations issued by the regulator in the banking industry in Indonesia. In addition, the Group should also follow all prevailing rules and regulations in the society whether directly or indirectly related with the business activities conducted by the Group. Failure by the Group to comply with such prevailing laws and regulations may give rise to legal claims against the Group. If legal claims against the Group are material in amounts, then it may directly affect the Group's financial performance.*

*Group implements legal risk identification based on several factors include lawsuits, lack of rule or law that supports the regulation and the weakness of the agreement. The Group performed legal risk control to ensure that all activities and working relationships with third parties have been based on the rules and requirements that can protect the Group's interests from legal terms including the anticipation of potential demands from external parties.*

*To mitigate the possible legal risk caused by legal claims or weaknesses in legal aspects, the Group has a General Legal Counsel Bureau. Such division has the following functions:*

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko operasional (lanjutan)**

- 1) melakukan analisis hukum atas produk dan aktivitas baru serta membuat standar dokumen hukum yang terkait dengan produk dan aktivitas baru tersebut;
- 2) memberikan analisis/pendapat hukum;
- 3) memberikan pendapat atas eksposur hukum akibat perubahan ketentuan atau peraturan;
- 4) memeriksa segala perjanjian yang akan dibuat antara Grup dengan pihak ketiga;
- 5) melakukan pemeriksaan berkala atas perjanjian yang telah dibuat.

Dengan adanya biro tersebut, maka kebijakan hukum dan standar dokumen hukum yang terkait dengan produk atau fasilitas perbankan yang ditawarkan oleh Grup kepada masyarakat dimana kebijakan hukum dan standar dokumen hukum dimaksud dibuat dengan mengacu kepada ketentuan peraturan perundangan yang berlaku serta memperhatikan kepentingan aspek hukum dari Grup.

Selain itu, Biro Hukum juga memiliki bagian Litigasi untuk menangani setiap permasalahan hukum yang terkait dengan litigasi agar risiko hukum yang mungkin timbul dapat diminimalisir seminimum mungkin.

Pengelolaan risiko hukum dilakukan dengan memantau perkembangan kasus-kasus hukum yang terjadi dan mengambil pembelajaran dari kasus-kasus tersebut. Penanganan kasus hukum yang dilakukan pada Grup senantiasa memperhitungkan potensi kerugian.

**Risiko reputasi**

Risiko reputasi adalah risiko akibat menurunnya tingkat kepercayaan *stakeholder* yang bersumber dari persepsi negatif terhadap Grup. Risiko ini melekat dalam setiap kegiatan yang dilakukan oleh Grup. Kegagalan Grup dalam menjaga reputasinya di mata masyarakat dapat menimbulkan pandangan maupun persepsi negatif masyarakat terhadap Grup. Apabila risiko ini dihadapi oleh Grup, maka dalam waktu singkat dapat terjadi penurunan atau hilangnya kepercayaan nasabah terhadap Grup yang pada akhirnya akan memberikan dampak negatif terhadap pendapatan dan volume aktivitas Grup.

**46. RISK MANAGEMENT (continued)**

**Operational risk (continued)**

- 1) to provide legal analysis on new product and activity and prepare standard legal document related with such new product and activity;
- 2) to provide legal analysis/advice;
- 3) to provide advice on legal exposure due to change of laws or regulations;
- 4) to review any contracts between the Group and third party;
- 5) to conduct a periodical review on contracts which have been executed.

Based on the bureau above, legal policy and legal document standards related to the product or banking facilities offered by the Group to public, whereby the legal policy and legal document standards are intentionally made in accordance with the prevailing laws and regulations also considering the interests in the legal aspect of the Group.

In addition, the General Legal Counsel Bureau also has a Litigation division to handle every legal case related to litigation so that the possible legal risk can be minimised as minimum as possible.

The legal risk is also conducted by monitoring the development of legal cases and take lesson learnt principle from those cases. The management of legal cases conducted by the Group is calculating potential loss at all time.

**Reputation risk**

Reputation risk is the risk related to the decreasing level of stakeholders' confidence arising from the negative perception on the Group. Reputation risk is inherent in every activity conducted by the Group. The Group 's failure to protect its reputation in the public's eye may result in negative view as well as perception by the public towards the Group. If the Group faces this risk, then in the short run, the Bank may lose the customer's trust that will ultimately result in a negative impact to the Group's income and volume of activities.

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko reputasi (lanjutan)**

Risiko reputasi dapat berdampak langsung pada berkurangnya kepercayaan nasabah sehingga jumlah nasabah ataupun pendapatan Grup menurun. Dalam mengelola risiko reputasi, Grup berupaya untuk menjaga reputasi dengan memberikan pelayanan terbaik dalam menangani keluhan dan memberikan kepuasan kepada nasabah untuk menghindari munculnya keluhan tersebut di media.

*Corporate Secretary* setiap hari melakukan pengawasan atas pemberitaan media untuk memantau publikasi negatif atau keluhan nasabah yang muncul di media. Sedangkan pengawasan atas keluhan nasabah yang disampaikan langsung ke Grup dilakukan oleh *Group Quality Service* untuk kemudian ditindaklanjuti penyelesaiannya.

Untuk pemberitaan negatif dan keluhan nasabah yang muncul di media selanjutnya dibuatkan klarifikasi dan tanggapan sesuai dengan langkah yang akan ditempuh Grup. Upaya mitigasi risiko reputasi juga dilakukan saat Grup meluncurkan produk/layanan/program baru dengan menganalisis risiko reputasi yang mungkin timbul dan bagaimana mengantisipasi risiko tersebut. Demikian pula, untuk informasi yang material atau yang penting untuk diketahui oleh nasabah, *Corporate Secretary* juga menyiapkan panduan untuk para *frontliner* dan *spokespersons* agar mereka bisa menjelaskan informasi tersebut secara benar dan proporsional kepada nasabah.

**Risiko strategik**

Risiko strategik adalah risiko akibat ketidaktepatan dalam pengambilan dan/atau penerapan suatu keputusan strategik serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Ketidakmampuan Grup dalam melakukan penyusunan strategi yang tepat dapat menimbulkan kegagalan bisnis Grup di masa yang akan datang.

Risiko ini juga mencakup kemampuan Grup dalam meningkatkan daya saing dan menciptakan keunggulan kompetitif Grup di tengah kompetisi perbankan yang semakin ketat. Ketidakmampuan Grup dalam menghadapi tantangan bisnis yang terus mengalami perubahan dari waktu ke waktu akan mengakibatkan kegagalan bagi Grup untuk mencapai visi yang selama ini telah ditetapkan.

**46. RISK MANAGEMENT (continued)**

**Reputation risk (continued)**

*Reputational risks can have a direct impact on the decreasing of customer confidence as a result the number of customers or the Group's income decreased. In managing reputation risk, the Group seeks to maintain a reputation for providing the best service to handle complaints and provide satisfaction to customers to avoid the appearance of such complaints in media.*

*The Corporate Secretary performs a daily media monitoring of the news to observe negative publications or customers' complaints which appear in the media. The monitoring of customers' complaints which are submitted directly to the Group is performed by the Group Quality Service for follow up action to resolve.*

*For negative news publication and customers' complaints which appear in the media, a clarification and appropriate response will be conducted in accordance with the steps undertaken by the Group. Efforts to mitigate the reputation risk are also undertaken everytime when the Group launches a new product/service/program by analysing the possibility of reputation risk that may arise and how to anticipate such risk. Moreover, for material or important information to be known by the customer, the Corporate Secretary also prepares guidelines for frontliners and spokespersons so that they are able to explain the information correctly and proportionately to customers.*

**Strategic risk**

*Strategic risk is the risk due to inaccuracy in deciding and/or implementing a strategic decision as well as the failure in anticipating the changes in the business environment. Failure in formulating the right strategy may deteriorate the Group's business in the future.*

*This risk also includes the Group's ability to develop its competitiveness and create a Group's competitiveness edge amidst the stiff competition in the banking industry. The inability of Group to cope with such business challenges which are constantly changing from time to time will lead Group to failure to accomplished determined vision.*

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**46. MANAJEMEN RISIKO (lanjutan)**

**Risiko stratejik (lanjutan)**

Grup mengelola risiko stratejik melalui proses pertimbangan dan pengambilan keputusan secara komprehensif dan kolektif di lingkungan komite-komite pengawasan dan eksekutif, yang turut mempengaruhi dan berdampak pada langkah-langkah bisnis yang akan diambil dalam kerangka kebijakan dan arah yang telah ditetapkan oleh Grup.

**Risiko kepatuhan**

Risiko kepatuhan merupakan risiko akibat Grup tidak mematuhi dan/atau tidak melaksanakan peraturan perundang-undangan dan ketentuan yang berlaku termasuk prinsip syariah bagi perbankan syariah. Dalam menjalankan kegiatan usaha pada industri Perbankan, Grup diwajibkan untuk selalu tunduk terhadap peraturan perbankan yang diterbitkan baik oleh Pemerintah maupun Otoritas. Selain itu, Grup juga tunduk kepada beberapa ketentuan lainnya seperti: peraturan yang mengatur Penjaminan Simpanan, Perseroan Terbatas, Perpajakan dan peraturan di bidang pasar modal (Otoritas Jasa Keuangan) dan Fatwa dari Dewan Syariah Nasional.

Pada umumnya, risiko kepatuhan melekat pada Grup sebagai sebuah lembaga perbankan, seperti: risiko kredit terkait dengan ketentuan Kewajiban Penyediaan Modal Minimum (KPMM); Penilaian Kualitas Aset; Pembentukan Cadangan Kerugian Penurunan Nilai (CKPN); Batas Maksimum Pemberian Kredit (BMPK); penerapan tata kelola yang baik (GCG) dan risiko lain yang terkait dengan ketentuan tertentu. Ketidakmampuan Grup untuk mengikuti dan mematuhi seluruh peraturan perundangan yang terkait dengan kegiatan usaha Grup dapat berdampak terhadap kelangsungan usaha Grup.

Grup melakukan identifikasi dan pengelolaan risiko kepatuhan sejak awal dengan memberikan bantuan kepada unit bisnis dan unit operasional dalam hal pengembangan produk dan aktivitas baru dan secara aktif melakukan penilaian terhadap kebijakan Pedoman dan Prosedur Internal yang dimiliki oleh Grup untuk memastikan bahwa seluruh peraturan eksternal telah diakomodir sedemikian rupa dan selanjutnya untuk dipatuhi dalam pelaksanaannya.

**46. RISK MANAGEMENT (continued)**

**Strategic risk (continued)**

*The Group manages strategic risks through a comprehensive and collective consideration and decision-making processes encompassing areas of the supervisory and executive committee that influence and impact business decisions on policies and directions that the Group will embark on.*

**Compliance risk**

*Compliance risk is the risks resulting from the failure of the Group in fulfilling and/or implementing the prevailing laws and regulations including sharia principles for sharia banking. In engaging in the banking industry services, the Group is required to always comply with the banking regulations issued by the Government and Authority. In addition, the Group is also required to comply with several other rules such as: regulation on Deposit Guarantee Program, Limited Liability Company, Taxation and Capital Market (Financial Services Authority) regulations and Fatwa of National Islamic Council.*

*In general, the compliance risk is embedded in the Group as a banking institution, such as: credit risks related to Capital Adequacy Ratio (CAR) regulations; Assessment of Assets Quality; Allowance for Impairment Losses (CKPN); Legal Lending Limit (LLL); Good Corporate Governance (GCG) and other risks related to certain regulations. The inability of the Group to follow and comply with all laws and regulations related to the Group's business activities may affect the continuity of the Group's operation.*

*The Group implements early detection and management of compliance risks by providing assistance to business and operational units and new product and new activity and also evaluated the Group's Guidelines and Procedures to ensure that all external regulations have been accommodated and implemented correctly.*



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**47. NILAI WAJAR INSTRUMEN KEUANGAN**

Aset dan liabilitas keuangan yang diukur pada nilai wajar menggunakan hierarki nilai wajar sebagai berikut:

- i. Tingkat 1: input yang berasal dari harga kuotasian (tanpa penyesuaian) di pasar aktif untuk instrumen yang identik yang dapat diakses Grup pada tanggal pengukuran.
- ii. Tingkat 2: input selain harga kuotasian yang termasuk dalam level 1 yang dapat diobservasi, baik secara langsung atau tidak langsung. Dalam kategori ini termasuk instrumen yang dinilai dengan menggunakan: harga kuotasian untuk instrumen yang serupa di pasar aktif; harga kuotasian untuk instrumen yang identik atau yang serupa di pasar yang tidak aktif; atau teknik penilaian lainnya dimana seluruh input signifikan dapat diobservasi secara langsung maupun tidak langsung dari data pasar.
- iii. Tingkat 3: input yang tidak dapat diobservasi. Dalam kategori ini termasuk semua instrumen dimana teknik penilaian menggunakan input yang tidak dapat diobservasi dan input yang tidak dapat diobservasi ini memberikan dampak signifikan terhadap penilaian instrumen. Termasuk dalam kategori ini adalah instrumen yang dinilai berdasarkan harga kuotasian untuk instrumen serupa yang memerlukan penyesuaian atau asumsi signifikan yang tidak dapat diobservasi untuk mencerminkan perbedaan diantara instrumen tersebut.

Tabel berikut menyajikan instrumen keuangan Grup yang diukur sebesar nilai wajar:

**47. FAIR VALUE OF FINANCIAL INSTRUMENTS**

The financial assets and liabilities measured at fair value use the following fair value hierarchy:

- i. Level 1: inputs that are quoted prices (unadjusted) in active markets for identical instruments that the Group can access at the measurement date.
- ii. Level 2: inputs other than quoted prices included within level 1 that are observable either directly or indirectly. This category includes instruments valued using: quoted market prices in active markets for similar instruments; quoted market prices in active markets for similar instruments; quoted prices for identical or similar instruments in markets that are not active; or other valuation techniques in which all significant inputs are directly or indirectly observable from market data.
- iii. Level 3: inputs that are unobservable. This category includes all instruments for which the valuation technique includes inputs not based on observable data and the unobservable inputs have a significant effect on the instrument's valuation. This category includes instruments that are valued based on quoted prices for similar instruments for which significant unobservable adjustments or assumptions are required to reflect differences between the instruments.

The following table presents the Group's financial instruments that are measured at fair value:

	31 Desember/ December 31, 2021				
	Tingkat 1/ Level 1	Tingkat 2/ Level 2	Tingkat 3/ Level 3	Jumlah/ Total	
Aset keuangan					Financial assets
Efek-efek	398.602.275	3.683.520.011	-	4.082.122.286	Marketable securities
Penyertaan saham	-	-	34.886.943	34.886.943	Investment in shares
<b>Jumlah</b>	<b>398.602.275</b>	<b>3.683.520.011</b>	<b>34.886.943</b>	<b>4.117.009.229</b>	<b>Total</b>
	31 Desember/ December 31, 2020				
	Tingkat 1/ Level 1	Tingkat 2/ Level 2	Tingkat 3/ Level 3	Jumlah/ Total	
Aset keuangan					Financial assets
Efek-efek	2.598.477.992	2.319.324.322	-	4.917.802.314	Marketable securities
Penyertaan saham	-	-	57.367.735	57.367.735	Investment in shares
<b>Jumlah</b>	<b>2.598.477.992</b>	<b>2.319.324.322</b>	<b>57.367.735</b>	<b>4.975.170.049</b>	<b>Total</b>

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**47. NILAI WAJAR INSTRUMEN KEUANGAN  
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Tidak terdapat perpindahan antara tingkat 1 dan tingkat 2 hierarki nilai wajar.

Tabel berikut ini menyajikan perubahan pada instrumen keuangan Grup yang diukur dengan tingkat 3 - hierarki nilai wajar untuk tahun yang berakhir pada 31 Desember 2021 dan 2020.

		31 Desember/December 31, 2021				
		Saldo awal/ Beginning balance	Penambahan/ Additions	Kerugian yang diakui pada laba rugi/ Loss recognised in profit or loss	Jumlah/ Total	
Aset keuangan						Financial assets
Penyertaan saham	57.367.735	-	(22.480.792)	34.886.943		Investment in shares
		31 Desember/December 31, 2020				
		Saldo awal/ Beginning balance	Penambahan/ Additions	Kerugian yang diakui pada laba rugi/ Loss recognised in profit or loss	Jumlah/ Total	
Aset keuangan						Financial assets
Penyertaan saham	86.224.917	-	(28.857.182)	57.367.735		Investment in shares

Pada Tanggal 31 Desember 2021 nilai wajar dari penyertaan saham sementara di PT Bima Multi Finance ditentukan dengan menggunakan model arus kas yang didiskontokan dengan tingkat diskonto sebesar 7,65% yang dihasilkan melalui analisa atas kinerja historis pada periode tahun 2014 - 2021 serta proyeksi kinerja yang dibuat oleh Manajemen PT Bima Multi Finance untuk periode tahun 2022 - 2026 berdasarkan rencana bisnis untuk masa yang akan datang yang telah disesuaikan untuk menghasilkan arus kas bersih untuk periode tahun 2022 - 2026.

Tabel berikut merangkum informasi kuantitatif mengenai asumsi signifikan yang tidak dapat diobservasi (tingkat 3) yang digunakan dalam pengukuran nilai wajar penyertaan saham sementara pada PT Bima Multi Finance.

**47. FAIR VALUE OF FINANCIAL INSTRUMENTS  
(continued)**

There is no transfer between level 1 and level 2 of fair value hierarchy.

The following table presents the changes in Group's financial instruments measured at level 3 - fair value hierarchy for the year ended December 31, 2021 and 2020.

As of December 31, 2021 the fair value of of temporary investment in shares in PT Bima Multi Finance is determined using a discounted cash flow model with a discount rate of 7.65% generated through analysis of historical performance in the period of 2014 - 2021 and the performance projections made by the Management of PT Bima Multi Finance for the period 2022 - 2026 based on adjusted future business plans to generate net cash flow for the period 2022 - 2026.

The following table summarises the quantitative information about the significant unobservable assumptions (level 3) used in the fair value measurements of temporary investment in shares in PT Bima Multi Finance.

	Rentang Input/Range of Input		
	2021	2020	
Tingkat diskonto	7.65%	6.31%	Discount rate
Tingkat diskon likuiditas pasar	30.00%	30.00%	Discount for lack of marketability
Suku Bunga kontraktual	41.00%-43.00%	41.00%-43.00%	Contractual interest rate
Rata-rata pembiayaan per unit	Rp5.500	Rp5.500	Average financing per unit
Rata-rata tertimbang kenaikan Penjualan per tahun	31.00%	24.26%	Weighted average of increment in sales per year
Tingkat kolektibilitas angsuran	99.00%-91.00%	99.00%-91.00%	Collection rate for installment

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**47. NILAI WAJAR INSTRUMEN KEUANGAN  
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Input utama tingkat 3 yang digunakan oleh Grup didapatkan dan dievaluasi sebagai berikut:

- Tingkat diskonto ditentukan menggunakan biaya ekuitas. Semakin tinggi nilai diskonto, semakin rendah nilai wajar.
- Tingkat diskon likuiditas pasar adalah suatu jumlah atau persentase tertentu yang merupakan pengurang dari nilai suatu ekuitas sebagai cerminan dari kurangnya likuiditas objek penilaian. Semakin tinggi nilai diskon likuiditas pasar, semakin rendah nilai wajar.
- Suku bunga kontraktual adalah suku bunga yang tercatat pada kontrak pembiayaan PT Bima Multi Finance. Semakin tinggi nilai suku bunga kontraktual, semakin tinggi nilai wajar.
- Rata-rata pembiayaan per unit adalah rata-rata nilai kontrak pembiayaan di PT Bima Multi Finance. Semakin tinggi nilai rata-rata pembiayaan per unit, semakin tinggi nilai wajar.
- Rata-rata tertimbang kenaikan penjualan per tahun ditentukan berdasarkan kinerja historis pada periode tahun 2014 - 2021 serta proyeksi kinerja yang dibuat oleh Manajemen PT Bima Multi Finance untuk periode tahun 2022 - 2026 berdasarkan rencana bisnis untuk masa yang akan datang. Semakin tinggi nilai rata-rata tertimbang kenaikan penjualan per tahun, semakin tinggi nilai wajar.
- Tingkat kolektibilitas angsuran ditentukan berdasarkan kinerja historis pada periode tahun 2014 - 2021 serta proyeksi kinerja yang dibuat oleh Manajemen PT Bima Multi Finance untuk periode tahun 2022 - 2026 berdasarkan rencana bisnis untuk masa yang akan datang. Semakin tinggi tingkat kolektibilitas angsuran, semakin tinggi nilai wajar.

Tabel di bawah ini menyajikan perbandingan antara nilai tercatat dan nilai wajar dari aset dan liabilitas keuangan yang tidak diukur pada nilai wajar. Nilai wajar yang diungkapkan adalah berdasarkan informasi relevan yang tersedia pada tanggal 31 Desember 2021 dan 2020, dan tidak diperbaharui untuk mencerminkan perubahan dalam kondisi pasar yang telah terjadi setelah tanggal ini.

**47. FAIR VALUE OF FINANCIAL INSTRUMENTS  
(continued)**

The main level 3 inputs used by the Group are derived and evaluated as follows:

- Discount rate is determined using cost of equity. The higher the discount rate, the lower the fair value.
- The discount for lack of marketability is a certain amount or percentage which is a deduction from the value of an equity as a reflection of the lack of liquidity of the valued object. The higher the discount for lack of marketability, the lower the fair value.
- Contractual interest rate is the interest rate recorded in the financing contract of PT Bima Multi Finance. The higher the contractual interest rate, the higher the fair value.
- Average financing per unit is the average value of the financing contract at PT Bima Multi Finance. The higher the average value of financing per unit, the higher the fair value.
- The weighted average sales increase per year is determined based on historical performance in the period 2014 - 2021 and the performance projections made by the Management of PT Bima Multi Finance for the period 2022 - 2026 based on future business plans. The higher the weighted average value of sales increases per year, the higher the fair value.
- The installment collectibility level is determined based on historical performance in the period 2014 - 2021 and performance projections made by the Management of PT Bima Multi Finance for the period 2022 - 2026 based on future business plans. The higher the installment rate, the higher the fair value.

The table below summarises the comparison between the carrying amounts and fair values of all financial assets and liabilities except those measured at fair value. The fair values disclosed are based on relevant information available as of December 31, 2021 and 2020, and are not updated to reflect changes in market conditions which have occurred after these dates.

The original consolidated financial statements included herein are in Indonesian language.

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47. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan)	31 Desember/ December 31, 2021		47. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)
	Nilai tercatat/ Carrying value	Nilai wajar/ Fair value	
<b><u>Aset Keuangan</u></b>			<b><u>Financial Assets</u></b>
Kas	53.929.444	53.929.444	Cash
Giro pada Bank Indonesia	663.113.716	663.113.716	Current accounts with Bank Indonesia
Giro pada bank lain	405.666.998	405.666.998	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank lain - bersih	762.366.332	762.366.332	Placements with Bank Indonesia and other banks - net
Efek-efek - bersih	1.113.455.670	1.093.364.366	Marketable securities - net
Efek-efek yang dibeli dengan janji dijual kembali - bersih	690.714.570	721.480.516	Securities purchased under resale agreements
Pendapatan bunga yang masih akan diterima	364.693.547	364.693.547	Interest receivables
Pinjaman yang diberikan, pembiayaan dan piutang kembali - bersih	14.786.800.658	15.298.892.707	Loans, sharia financing and receivables - net
Aset lain-lain	38.438.654	38.438.654	Other assets
<b>Jumlah aset keuangan</b>	<b><u>18.879.179.589</u></b>	<b><u>19.401.946.280</u></b>	<b>Total financial assets</b>
<b><u>Liabilitas Keuangan</u></b>			<b><u>Financial Liabilities</u></b>
Liabilitas segera	335.926	335.926	Obligations due immediately
Simpanan nasabah	18.084.871.983	18.084.871.983	Deposits from customers
Simpanan dari bank lain	1.037.173.068	1.037.173.068	Deposits from other banks
Pinjaman yang diterima	50.000.000	50.000.000	Borrowings
Efek-efek yang diterbitkan	1.348.520.029	1.371.920.780	Securities issued
Akrual dan liabilitas lain-lain	86.610.776	86.610.776	Accruals and other liabilities
<b>Jumlah liabilitas keuangan</b>	<b><u>20.607.511.782</u></b>	<b><u>20.630.912.533</u></b>	<b>Total financial liabilities</b>
<b><u>31 Desember/ December 31, 2020</u></b>			
	Nilai tercatat/ Carrying value	Nilai wajar/ Fair value	
<b><u>Aset Keuangan</u></b>			<b><u>Financial Assets</u></b>
Kas	61.723.223	61.723.223	Cash
Giro pada Bank Indonesia	612.623.334	612.623.334	Current accounts with Bank Indonesia
Giro pada bank lain - bersih	184.920.912	184.920.912	Current accounts with other banks - net
Penempatan pada Bank Indonesia dan bank lain - bersih	1.692.224.733	1.692.224.733	Placements with Bank Indonesia and other banks - net
Efek-efek - bersih	1.488.868.528	1.508.118.816	Marketable securities - net
Efek-efek yang dibeli dengan janji dijual kembali - bersih	447.804.800	458.800.000	Securities purchased under resale agreements
Pendapatan bunga yang masih akan diterima	248.240.453	248.240.453	Interest receivables
Pinjaman yang diberikan, pembiayaan dan piutang syariah - bersih	14.245.976.032	14.148.629.607	Loans, sharia financing and receivables - net
Aset lain-lain	30.638.516	30.638.516	Other assets
<b>Jumlah aset keuangan</b>	<b><u>19.013.020.531</u></b>	<b><u>18.945.919.594</u></b>	<b>Total financial assets</b>
<b><u>Liabilitas Keuangan</u></b>			<b><u>Financial Liabilities</u></b>
Liabilitas segera	2.086.598	2.086.598	Obligations due immediately
Simpanan nasabah	18.331.429.119	18.331.429.119	Deposits from customers
Simpanan dari bank lain	2.060.970.040	2.060.970.040	Deposits from other banks
Efek-efek yang diterbitkan	1.544.029.002	1.582.223.152	Securities issued
Akrual dan liabilitas lain-lain	160.672.869	160.672.869	Accruals and other liabilities
<b>Jumlah liabilitas keuangan</b>	<b><u>22.099.187.628</u></b>	<b><u>22.137.381.778</u></b>	<b>Total financial liabilities</b>

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**47. NILAI WAJAR INSTRUMEN KEUANGAN  
(lanjutan)**

Metode dan asumsi yang digunakan untuk estimasi nilai wajar adalah sebagai berikut:

a. Efek-efek

Nilai wajar untuk efek-efek yang diukur pada biaya perolehan diamortisasi ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (*broker*)/pedagang efek (*dealer*) (tingkat 1 - hierarki nilai wajar). Jika informasi ini tidak tersedia, nilai wajar diestimasi dengan menggunakan harga pasar kuotasi efek yang memiliki karakteristik kredit, jatuh tempo dan *yield* yang serupa (tingkat 2 - hierarki nilai wajar).

b. Pinjaman yang diberikan

Pinjaman yang diberikan dinyatakan berdasarkan jumlah nilai tercatat setelah dikurangi oleh beban penurunan nilai. Estimasi nilai wajar dari pinjaman yang diberikan mencerminkan jumlah diskonto dari estimasi kini dari arus kas masa depan yang diharapkan akan diterima. Arus kas yang diharapkan didiskontokan pada tingkat suku bunga pasar terkini untuk menentukan nilai wajar (tingkat 3 - hierarki nilai wajar).

c. Efek-efek yang diterbitkan

Nilai wajar untuk efek-efek yang diukur pada biaya perolehan diamortisasi ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (*broker*)/pedagang efek (*dealer*) (tingkat 1 - hierarki nilai wajar). Nilai wajar agregat dihitung berdasarkan harga pasar kuotasi. Jika informasi ini tidak tersedia, model diskonto arus kas digunakan berdasarkan kurva *yield* terkini yang sesuai dengan sisa periode jatuh temponya (tingkat 2 - hierarki nilai wajar).

d. Sebagian besar dari instrumen keuangan yang tidak diukur pada nilai wajar, diukur pada biaya perolehan diamortisasi. Berikut daftar instrumen keuangan yang nilai tercatatnya mendekati nilai wajarnya, contohnya, instrumen keuangan jangka pendek atau yang ditinjau ulang menggunakan harga pasar secara berkala.

**47. FAIR VALUE OF FINANCIAL INSTRUMENTS  
(continued)**

The methods and assumptions used to estimate fair value are as follows:

a. Marketable securities

The fair value for securities measured at amortised cost is based on market prices or broker/dealer price quotations (level 1 - fair value hierarchy). Where this information is not available, fair value is estimated using quoted market prices for securities with similar credit, maturity and yield characteristics (level 2 - fair value hierarchy).

b. Loans

Loans are recorded at carrying amount net of charges for impairment. The estimated fair value of loans represents the discounted amount of estimated future cash flows expected to be received. Estimated cash flows are discounted at current market rates to determine fair value (level 3 - fair value hierarchy).

c. Securities issued

The fair value for securities issued measured at amortised cost based on market prices or broker/dealer price quotations (level 1 - fair value hierarchy). The aggregate fair values are calculated based on quoted market prices. For those notes where quoted market prices are not available, a discounted cash flow model is used based on a current yield curve appropriate for the remaining term to maturity (level 2 - fair value hierarchy).

d. Majority of the financial instrument not measured at fair value are measured at amortised cost. The following are financial instruments for which their carrying amount are reasonable approximation of fair value because, for example, they are short term in nature or price to current market rates frequently.

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**47. NILAI WAJAR INSTRUMEN KEUANGAN  
(lanjutan)**

- d. Sebagian besar dari instrumen keuangan yang tidak diukur pada nilai wajar, diukur pada biaya perolehan diamortisasi. Berikut daftar instrumen keuangan yang nilai tercatatnya mendekati nilai wajarnya, contohnya, instrumen keuangan jangka pendek atau yang ditinjau ulang menggunakan harga pasar secara berkala. (lanjutan)

**Aset Keuangan:**

- Kas
- Giro pada Bank Indonesia
- Giro pada bank lain
- Penempatan pada Bank Indonesia dan bank lain
- Efek-efek yang dibeli dengan janji dijual kembali
- Pendapatan bunga yang masih akan diterima
- Aset lain-lain

**Liabilitas Keuangan:**

- Liabilitas segera
- Simpanan nasabah
- Simpanan dari bank lain
- Pinjaman yang diterima
- Efek-efek yang dijual dengan janji dibeli kembali
- Akrual dan liabilitas lain-lain

**48. MANAJEMEN MODAL**

Tujuan utama dari kebijakan Bank atas kebijakan pengelolaan modal adalah untuk memastikan bahwa Bank memiliki modal yang kuat untuk mendukung strategi pengembangan ekspansi usaha Bank saat ini dan mempertahankan kelangsungan pengembangan di masa mendatang, dan untuk memenuhi ketentuan kecukupan permodalan yang ditetapkan oleh regulator serta memastikan agar struktur permodalan Bank telah efisien.

Bank menyusun Rencana Permodalan berdasarkan penilaian dari penelaahan atas kebutuhan kecukupan permodalan yang dipersyaratkan dan mengkombinasikannya dengan tinjauan perkembangan ekonomi terkini. Bank senantiasa akan menghubungkan tujuan keuangan dan kecukupan modal terhadap risiko melalui proses perencanaan modal, begitu pula dengan bisnis yang didasarkan pada permodalan dan persyaratan likuiditas Bank.

**47. FAIR VALUE OF FINANCIAL INSTRUMENTS  
(continued)**

- d. Majority of the financial instrument not measured at fair value are measured at amortised cost. The following are financial instruments for which their carrying amount are reasonable approximation of fair value because, for example, they are short term in nature or re-price to current market rates frequently. (continued)

**Financial Assets:**

- Cash
- Current accounts with Bank Indonesia
- Current accounts with other banks
- Placement with Bank Indonesia and other banks
- Securities purchased under resale agreements
- Interest receivables
- Other assets

**Financial Liabilities:**

- Obligations due immediately
- Deposits from customers
- Deposits from other banks
- Borrowings
- Securities sold under repurchase agreements
- Accrued and other liabilities

**48. CAPITAL MANAGEMENT**

The primary objectives of the Bank's capital management policy are to ensure that the Bank has a strong capital to support the Bank's business expansion strategy currently to sustain future development of the business, to meet regulator capital adequacy requirements and also to ensure the efficiency of Bank's capital structure.

The Bank undertakes Capital Planning based on assessment and review of the capital situation in terms of the legal capital adequacy requirement, combined with assessment of economic outlooks. The Bank will continue to link financial and capital adequacy goals to risk appetite through the capital planning process as well as assess the businesses based on the Bank's capital and liquidity requirements.

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**48. MANAJEMEN MODAL (lanjutan)**

Kebutuhan permodalan Bank juga direncanakan dan didiskusikan secara rutin yang didukung dengan data analisis.

Permodalan disusun oleh Direksi sebagai bagian dari Rencana Bisnis Bank dan disetujui oleh Dewan Komisaris. Perencanaan ini diharapkan akan memastikan tersedianya modal yang cukup dan terciptanya struktur permodalan yang optimal untuk mendukung strategi Bank.

Bank telah melakukan perhitungan kecukupan modal berdasarkan ketentuan Bank Indonesia yang berlaku, dimana modal yang dimiliki diklasifikasikan dalam 2 Tier yaitu Modal Tier I dan Modal Tier II.

Bank mematuhi semua persyaratan modal yang ditetapkan oleh pihak eksternal sepanjang periode pelaporan, khususnya berkenaan dengan perhitungan Kewajiban Penyediaan Modal Minimum (KPMM) dan Aktiva Tertimbang Menurut Risiko (ATMR).

Kewajiban penyediaan modal Bank dengan memperhitungkan risiko kredit, risiko operasional dan risiko pasar:

	<b>31 Desember/December 31,</b>		
	<b>2021</b>	<b>2020</b>	
<b>Konsolidasi</b>			<b>Consolidated</b>
Modal			Capital
Tier I	2.339.061.218	2.169.418.041	Tier I
Tier II	836.085.894	948.194.125	Tier II
Jumlah Modal	<u>3.175.147.112</u>	<u>3.117.612.166</u>	Total Capital
Aset Tertimbang Menurut Risiko untuk Risiko Kredit	16.369.736.354	16.637.610.392	Risk Weighted Assets for Credit Risk
Aset Tertimbang Menurut Risiko untuk Risiko Operasional	1.039.636.918	1.303.631.080	Risk Weighted Assets for Operational Risk
Aset Tertimbang Menurut Risiko untuk Risiko Pasar	439.169.614	720.264.036	Risk Weighted Assets for Market Risk
Rasio Kewajiban Penyediaan Modal Minimum untuk risiko kredit dan risiko operasional	18,24%	17,38%	Capital Adequacy Ratio (CAR) with credit and operational risks
Rasio Kewajiban Penyediaan Modal Minimum untuk risiko kredit, risiko operasional dan risiko pasar	17,79%	16,71%	Capital Adequacy Ratio (CAR) with credit, operational and market risks
Rasio Kewajiban Penyediaan Modal Minimum yang diwajibkan	8,00%	8,00%	Minimum Capital Adequacy Ratio required

**48. CAPITAL MANAGEMENT (continued)**

The capital needs of the Bank are also discussed and planned on a routine basis as supported by data analysis.

Capital Planning is prepared by Directors as part of the Bank's business plan and is approved by the Board of Commissioners. Capital Planning ensures that adequate levels of capital and an optimum mix of the different components of capital are maintained to support the Bank's strategy.

The Bank calculated its capital adequacy requirements using the prevailing Bank Indonesia regulation, where the regulatory capital is classified into 2 Tiers: Tier I Capital and Tier II Capital.

The Bank has complied with all externally imposed capital requirements throughout the reporting period, particularly regarding Capital Adequacy Ratio (CAR) and calculation of Risk Weighted Assets (RWA).

The Bank's capital adequacy ratio with consideration for credit, operational and market risks:



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**48. MANAJEMEN MODAL (lanjutan)**

**48. CAPITAL MANAGEMENT (continued)**

	<u>31 Desember/December 31,</u>		
	<u>2021</u>	<u>2020</u>	
<b>Bank</b>			<b>Bank</b>
Modal			Capital
Tier I	2.078.799.243	1.919.949.689	Tier I
Tier II	<u>828.718.865</u>	<u>943.446.885</u>	Tier II
Jumlah Modal	<u>2.907.518.108</u>	<u>2.863.396.574</u>	Total Capital
Aset Tertimbang Menurut Risiko untuk Risiko Kredit	15.296.537.412	15.260.762.251	Risk Weighted Assets for Credit Risk
Aset Tertimbang Menurut Risiko untuk Risiko Operasional	932.424.247	1.204.567.431	Risk Weighted Assets for Operational Risk
Aset Tertimbang Menurut Risiko untuk Risiko Pasar	396.881.734	697.735.341	Risk Weighted Assets for Market Risk
Rasio Kewajiban Penyediaan Modal Minimum untuk risiko kredit dan risiko operasional	17,92%	17,39%	Capital Adequacy Ratio (CAR) with credit and operational risks
Rasio Kewajiban Penyediaan Modal Minimum untuk risiko kredit, risiko operasional dan risiko pasar	17,49%	16,68%	Capital Adequacy Ratio (CAR) with credit, operational and market risks
Rasio Kewajiban Penyediaan Modal Minimum yang diwajibkan	8,00%	8,00%	Minimum Capital Adequacy Ratio required

**49. STANDAR AKUNTANSI BARU**

**49. NEW ACCOUNTING STANDARD**

Berlaku efektif 1 Januari 2022:

Effective on January 1, 2022:

- Amendemen PSAK 22: Kombinasi Bisnis tentang Referensi ke Kerangka Konseptual;
- Amendemen PSAK 57: Provisi, Liabilitas Kontinjensi, dan Aset Kontinjensi tentang Kontrak Memberatkan - Biaya Memenuhi Kontrak; dan
- Penyesuaian Tahunan 2020 - PSAK 71: Instrumen Keuangan - Imbalan dalam pengujian "10 per sen" untuk penghentian pengakuan liabilitas keuangan.

- Amendments to SFAS 22: Business Combinations regarding Reference to Conceptual Frameworks;
- Amendments to SFAS 57: Provisions, Contingent Liabilities, and Contingent Assets regarding Aggravating Contracts – Contract – fulfillment Costs; and
- 2020 Annual Adjustments – SFAS 71: Financial Instruments – Fees in the 10 per cent test for derecognition of financial liabilities.

Berlaku efektif 1 Januari 2023

Effective on January 1, 2023:

- Amendemen PSAK 1: Penyajian Laporan Keuangan tentang Klasifikasi Liabilitas sebagai Jangka Pendek atau Jangka Panjang.

- Amendments to SFAS 1: Classification of Liabilities as Current and Non Current.

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**49. STANDAR AKUNTANSI BARU (lanjutan)**

Berlaku efektif 1 Januari 2025:

- PSAK 74: Kontrak Asuransi

Dampak dari penerapan standar, amendemen/penyesuaian, dan interpretasi tersebut terhadap laporan keuangan konsolidasian masih dalam proses evaluasi dan belum dapat ditentukan oleh manajemen.

**50. DAMPAK PENERAPAN PSAK 71 DAN 73**

Sebagaimana dijelaskan dalam Catatan 2d, Grup telah menerapkan PSAK 71 dan 73 pada tanggal 1 Januari 2020, dampak atas transisi tersebut pada laporan posisi keuangan konsolidasian 1 Januari 2020 adalah sebagai berikut:

**49. NEW ACCOUNTING STARDARD (continued)**

Effective on January 1, 2025:

- SFAS 74: Insurance Contract.

The Company's management is currently evaluating and has not determined the effect of these SFAS amendments and improvements and ISAK to the consolidated financial statements.

**50. IMPACT OF THE IMPLEMENTATION OF SFAS 71 AND 73**

As described in Note 2d, the Group has adopted SFAS 71 and 73 as of 1 January 2020, the effect of this transision to SFAS 71 and 73 has had on these consolidated financial statements as of 1 January 2020 are as follows:

	Catatan/ Notes	Saldo sebelum penerapan PSAK 71 & 73/ Balance before adoption of SFAS 71 & 73	Kerugian kredit ekspektasian/ Expected credit losses	Sewa/ Leases	Saldo setelah penerapan PSAK 71 & 73/ Balance after adoption of SFAS 71 & 73	
<b>ASET</b>						<b>ASSETS</b>
Biaya dibayar dimuka	14	25.668.592	-	(5.340.474)	20.328.118	Prepaid expenses
Pinjaman yang diberikan - setelah dikurangi cadangan kerugian penurunan nilai	11	17.054.738.234	(257.644.035)	-	16.797.094.199	Loans - net allowance for impairment losses
Aset pajak tangguhan - bersih	24c	162.297.748	56.681.688	-	218.979.436	Deferred tax assets - net
Aset tetap - setelah dikurangi akumulasi penyusutan	15	521.735.784	-	37.937.570	559.673.354	Fixed assets - net accumulated depreciation
<b>LIABILITAS</b>						<b>LIABILITIES</b>
Akrual dan liabilitas lain-lain	25	154.416.158	-	35.105.739	189.521.897	Accruals and other liabilities
<b>EKUITAS</b>						<b>EQUITY</b>
Saldo laba						Retained earnings
- Sudah ditentukan penggunaannya	30	186.356.165	-	-	186.356.165	Appropriated -
- Belum ditentukan penggunaannya		1.233.168.159	(200.962.347)	(2.117.020)	1.030.088.792	Unappropriated -

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**50. DAMPAK PENERAPAN PSAK 71 DAN 73  
(lanjutan)**

**a. Dampak Penerapan PSAK 71**

**Penurunan Nilai Instrumen Keuangan**

Berikut ini menyajikan dampak atas transisi dari "incurred loss approach" menjadi "kerugian kredit ekspektasian" untuk aset keuangan yang diukur pada biaya perolehan diamortisasi:

	Catatan/ Notes	Cadangan kerugian penurunan nilai menurut PSAK 55/ Allowance for impairment losses per SFAS 55			Kerugian penurunan nilai menurut PSAK 71/ Impairment losses per SFAS 71					Kenaikan/ (penurunan)/ Increase/ (decrease)	
		Cadangan kerugian penurunan nilai kolektif/ Collective impairment provision	Cadangan kerugian penurunan nilai individual/ Individual impairment provision	Jumlah/ Total	Stage 1	Stage 2	Stage 3	Syariah/ sharia	Jumlah/ Total		
Efek-efek Pinjaman yang diberikan Penyertaan saham	8	-	11.240.001	11.240.001	-	-	11.240.001	-	11.240.001	-	Marketable securities
	11	52.601.635	332.779.663	385.381.298	70.477.539	153.127.380	397.409.997	22.010.417	643.025.333	257.644.035	Loans Investment in shares
	13	295	-	295	295	-	-	-	295	-	
		<u>52.601.930</u>	<u>344.019.664</u>	<u>396.621.594</u>	<u>70.477.834</u>	<u>153.127.380</u>	<u>408.649.998</u>	<u>22.010.417</u>	<u>654.265.629</u>	<u>257.644.035</u>	

**b. Dampak Penerapan PSAK 73**

Rekonsiliasi antara komitmen sewa operasi yang diungkapkan berdasarkan PSAK 30 pada tanggal 31 Desember 2019 dan liabilitas sewa yang diakui berdasarkan PSAK 73 pada tanggal 1 Januari 2020 adalah sebagai berikut:

	Jumlah/ Amount
Komitmen sewa operasi yang diungkapkan pada 31 Desember 2019	-
Ditambah: komitmen sewa yang tidak diungkapkan pada 31 Desember 2019	42.364.622
Didiskontokan dengan menggunakan suku bunga pinjaman antar bank	(5.790.987)
Dikurangi: - aset bernilai rendah	<u>(1.467.896)</u>
<b>Jumlah liabilitas sewa yang diakui pada 1 Januari 2020</b>	<u><u>35.105.739</u></u>

**50. IMPACT OF THE IMPLEMENTATION OF SFAS 71  
AND 73 (continued)**

**a. Impact on Implementation of SFAS 71**

**Impairment of Financial Instruments**

The following summarises the effects of transitioning from the "incurred loss approach" to the "expected credit losses" approach for financial assets measured at amortised cost:

**b. Impact on Implementation of SFAS 73**

The reconciliation between the operating leases commitments disclosed under SFAS 30 as of 31 December 2019 and the leases liabilities recognised under SFAS 73 as of January 1, 2020 is as follows:

Operating leases commitment disclosed as of 31 December 2019	-
Add: operating lease commitments were not disclosed as of 31 December 2019	42.364.622
Discounted using the interbank borrowing rate	(5.790.987)
Less: low value assets -	<u>(1.467.896)</u>
<b>Leases liabilities recognised as of January 1, 2020</b>	<u><u>35.105.739</u></u>

*The original consolidated financial statements included herein are in Indonesian language.*

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**51. INFORMASI TAMBAHAN**

Informasi yang disajikan pada lampiran 1-4 merupakan informasi keuangan tambahan PT Bank Victoria International Tbk, Entitas Induk, yang menyajikan penyertaan bank pada entitas anak PT Bank Victoria Syariah berdasarkan metode ekuitas.

Oleh karena perbedaan antara laporan keuangan Entitas Induk dengan laporan keuangan konsolidasian tidak material, maka Catatan atas laporan keuangan Entitas Induk tidak disajikan dalam informasi tambahan ini.

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**51. ADDITIONAL INFORMATION**

*The additional information presented in appendix 1-4 is a supplementary financial information of PT Bank Victoria International Tbk, parent entity, which presents the bank's investment in subsidiary PT Bank Victoria Syariah using equity method.*

*On the basis that the differences between the Parent Entity and consolidated financial statements are not material, notes to the financial statements of the Parent Entity are not presented in this additional information.*

**INFORMASI KEUANGAN ENTITAS INDUK/  
SUPPLEMENTARY FINANCIAL INFORMATION OF THE PARENT ENTITY**

<b>PT BANK VICTORIA INTERNATIONAL Tbk (ENTITAS INDUK) LAPORAN POSISI KEUANGAN TANGGAL 31 DESEMBER 2021 (Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)</b>	<b>31 Desember/ December 31,</b>		<b>PT BANK VICTORIA INTERNATIONAL Tbk (PARENT ENTITY) STATEMENT OF FINANCIAL POSITION As of December 31, 2021 (Expressed in thousands of Rupiah, unless otherwise stated)</b>
	<u>2021</u>	<u>2020</u>	
<b>ASET</b>			<b>ASSETS</b>
Kas	52.684.904	59.905.635	Cash
Giro pada Bank Indonesia	615.714.645	570.507.475	Current accounts with Bank Indonesia
Giro pada bank lain	401.871.737	182.708.000	Current accounts with other banks
Penempatan pada Bank Indonesia dan bank lain	590.852.298	1.444.224.733	Placements with Bank Indonesia and other banks
Dikurangi: Cadangan kerugian penurunan nilai	(1.485.966)	-	Less: Allowance for impairment losses
	<u>589.366.332</u>	<u>1.444.224.733</u>	
Efek-efek	4.648.563.587	5.703.650.818	Marketable securities
Dikurangi: Cadangan kerugian penurunan nilai	(11.108.843)	(9.663.323)	Less: Allowance for impairment losses
	<u>4.637.454.744</u>	<u>5.693.987.495</u>	
Efek-efek yang dibeli dengan janji dijual kembali	690.714.570	447.804.800	Securities purchased under resale agreements
Pendapatan bunga yang masih akan diterima	351.020.505	233.132.823	Interest receivables
Biaya dibayar dimuka	7.688.275	12.317.581	Prepaid expenses
Pinjaman yang diberikan			Loans
- Pihak berelasi	218.418.595	236.533.785	Related parties -
- Pihak ketiga	14.464.686.514	13.439.848.917	Third parties -
	<u>14.683.105.109</u>	<u>13.676.382.702</u>	
Dikurangi: Cadangan kerugian penurunan nilai	(651.502.748)	(570.980.328)	Less: Allowance for impairment losses
	<u>14.031.602.361</u>	<u>13.105.402.374</u>	
Penyertaan saham	392.461.825	410.422.569	Investments in shares
Agunan yang diambil alih	1.324.042.288	1.531.471.349	Foreclosed assets
Dikurangi: Cadangan kerugian penurunan nilai	(259.113.737)	(262.694.276)	Less: Allowance for impairment losses
	<u>1.064.928.551</u>	<u>1.268.777.073</u>	
Aset pajak tangguhan - bersih	294.914.285	239.833.306	Deferred tax assets - net
Aset tetap	581.538.940	603.602.747	Fixed assets
Dikurangi: Akumulasi penyusutan	(77.949.546)	(52.234.680)	Less: Accumulated depreciation
	<u>503.589.394</u>	<u>551.368.067</u>	
Aset tak berwujud - bersih	2.189.971	3.241.090	Intangible assets - net
Aset lain-lain	58.458.490	65.225.850	Other assets
Dikurangi: Cadangan kerugian penurunan nilai	(34.719.346)	(8.942.972)	Less: Allowance for impairment losses
	<u>23.739.144</u>	<u>56.282.878</u>	
<b>JUMLAH ASET</b>	<u><b>23.659.941.243</b></u>	<u><b>24.279.915.899</b></u>	<b>TOTAL ASSETS</b>

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<b>PT BANK VICTORIA INTERNATIONAL Tbk (ENTITAS INDUK) LAPORAN POSISI KEUANGAN TANGGAL 31 DESEMBER 2021 (Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)</b>	<b>31 Desember/ December 31,</b>		<b>PT BANK VICTORIA INTERNATIONAL Tbk (PARENT ENTITY) STATEMENT OF FINANCIAL POSITION As of December 31, 2021 (Expressed in thousands of Rupiah, unless otherwise stated)</b>
	<u>2021</u>	<u>2020</u>	
<b>LIABILITAS DAN EKUITAS</b>			<b>LIABILITIES AND EQUITY</b>
<b>LIABILITAS</b>			<b>LIABILITIES</b>
Simpanan nasabah			Deposits from customers
- Pihak berelasi	712.270.247	273.542.932	Related parties -
- Pihak ketiga	<u>17.359.671.400</u>	<u>17.806.541.323</u>	Third parties -
	18.071.941.647	18.080.084.255	
Simpanan dari bank lain			Deposits from other banks
- Pihak ketiga	1.008.790.934	1.801.807.103	Third parties -
Efek-efek yang diterbitkan	1.348.520.029	1.544.029.002	Securities issued
Pinjaman dari bank lain	50.000.000	-	Loans from other banks
Utang pajak			Taxes payable
- Pajak penghasilan badan	-	-	Corporate income tax -
- Pajak lainnya	<u>11.567.353</u>	<u>19.760.854</u>	Other taxes -
	11.567.353	19.760.854	
Akrual dan liabilitas lain-lain	117.891.301	163.210.618	Accruals and other liabilities
Liabilitas imbalan kerja karyawan	<u>40.163.374</u>	<u>53.121.809</u>	Employee benefits obligation
<b>JUMLAH LIABILITAS</b>	<b><u>20.648.874.638</u></b>	<b><u>21.662.013.641</u></b>	<b>TOTAL LIABILITIES</b>
<b>EKUITAS</b>			<b>EQUITY</b>
Modal saham - nilai nominal			Share capital - par value
Rp100 (dalam Rupiah penuh)			Rp100 (full amount)
per saham			per share
Modal dasar - 14.000.000.000			Authorised capital - 14,000,000,000
saham pada			shares as at
31 Desember 2021 dan 2020			December 31, 2021 and 2020
Modal ditempatkan dan disetor			Issued and fully paid
penuh - 10.487.132.568			capital - 10,487,132,568
dan 8.951.947.039			and 8,951,947,039
saham pada tanggal			shares as at
31 Desember 2021 dan			December 31, 2021 and
31 Desember 2020	1.048.713.257	895.194.704	December 31, 2020
Tambahan modal disetor	407.785.927	282.775.419	Additional paid-in capital
Setoran modal diterima dimuka	278.000.000	-	Capital received in advance
Keuntungan yang belum			Unrealised gain on changes in
direalisasi atas perubahan nilai			fair value of marketable securities
wajar efek-efek yang diukur			measured at fair value through other
pada nilai wajar melalui penghasilan			comprehensive income, net of tax
komprehensif lain, setelah pajak	17.991.650	70.892.050	
Surplus revaluasi aset tetap,			Gain on revaluation of
setelah pajak	382.456.152	375.372.275	fixed assets, net of tax
Pengukuran kembali atas liabilitas			Remeasurements on employee
imbalan kerja, setelah pajak	17.908.422	16.393.115	benefit liabilities, net of tax
Saldo laba:			Retained earnings:
- Telah ditentukan penggunaannya	177.200.000	177.200.000	Appropriated -
- Belum ditentukan penggunaannya	<u>681.011.197</u>	<u>800.074.695</u>	Unappropriated -
<b>JUMLAH EKUITAS</b>	<b><u>3.011.066.605</u></b>	<b><u>2.617.902.258</u></b>	<b>TOTAL EQUITY</b>
<b>JUMLAH LIABILITAS DAN EKUITAS</b>	<b><u>23.659.941.243</u></b>	<b><u>24.279.915.899</u></b>	<b>TOTAL LIABILITIES AND EQUITY</b>

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PT BANK VICTORIA INTERNATIONAL Tbk (ENTITAS INDUK) LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN UNTUK TAHUN YANG BERAKHIR PADA 31 DESEMBER 2021 (Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)	Tahun yang berakhir pada tanggal 31 Desember/ Year Ended December 31,		PT BANK VICTORIA INTERNATIONAL Tbk (PARENT ENTITY) STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEAR ENDED DECEMBER 31, 2021 (Expressed in thousands of Rupiah, unless otherwise stated)
	2021	2020	
<b>PENDAPATAN DAN BEBAN OPERASIONAL</b>			<b>OPERATING INCOME AND EXPENSES</b>
Pendapatan bunga	1.498.391.642	1.641.890.218	Interest income
Beban bunga	(1.080.191.620)	(1.488.738.081)	Interest expenses
Pendapatan bunga - bersih	<u>418.200.022</u>	<u>153.152.137</u>	Interest income - net
<b>PENDAPATAN DAN BEBAN OPERASIONAL LAINNYA</b>			<b>OTHER OPERATING INCOME AND EXPENSES</b>
Pendapatan operasional lainnya			Other operating income
Pendapatan dari investasi reksadana	21.743.876	83.949.209	Income from mutual funds
Keuntungan atas penjualan efek-efek yang diukur pada nilai wajar melalui laba rugi dan penghasilan komprehensif lain - bersih	137.419.251	260.902.553	Gain on sale of securities measured at fair value through profit or loss and other comprehensive income - net
Provisi dan komisi selain dari pinjaman	4.484.169	7.332.364	Fees and commissions from transactions other than loans
Kerugian atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui laba rugi - bersih	(304.026)	(1.662.564)	Loss on changes in fair value of securities measured at fair value through profit or loss - net
Lain-lain	<u>267.305.312</u>	<u>125.740.449</u>	Others
Jumlah pendapatan operasional lainnya	<u>430.648.582</u>	<u>476.262.011</u>	Total other operating income
Beban operasional lainnya			Other operating expenses
Beban penyisihan kerugian penurunan nilai aset keuangan	(554.274.003)	(360.213.811)	Provision for impairment losses on financial assets
Beban penyisihan kerugian penurunan nilai aset non-keuangan	3.580.539	(104.861.674)	Provision for impairment losses on non-financial assets
Kerugian atas perubahan nilai wajar penyertaan saham yang diukur pada nilai wajar melalui laba rugi	(22.480.825)	(28.826.491)	Loss on changes in fair value of investment in shares measured at fair value through profit or loss
Beban umum dan administrasi	(138.587.538)	(146.724.447)	General and administrative expenses
Beban tenaga kerja	(123.543.647)	(151.205.559)	Personnel expenses
Lain-lain	<u>(108.261.928)</u>	<u>(88.725.140)</u>	Others
Jumlah beban operasional lainnya	<u>(943.567.402)</u>	<u>(880.557.122)</u>	Total other operating expenses
<b>RUGI OPERASIONAL</b>	<b>(94.718.798)</b>	<b>(251.142.974)</b>	<b>LOSS FROM OPERATIONS</b>
<b>BEBAN NON OPERASIONAL - BERSIH</b>	<b>(64.932.449)</b>	<b>(50.716.050)</b>	<b>NON-OPERATING EXPENSE - NET</b>
<b>RUGI SEBELUM BEBAN PAJAK PENGHASILAN</b>	<b>(159.651.247)</b>	<b>(301.859.024)</b>	<b>LOSS BEFORE INCOME TAX EXPENSE</b>
<b>MANFAAT PAJAK PENGHASILAN - BERSIH</b>	<b>40.587.749</b>	<b>49.665.345</b>	<b>INCOME TAX BENEFIT - NET</b>
<b>RUGI BERSIH TAHUN BERJALAN</b>	<b>(119.063.498)</b>	<b>(252.193.679)</b>	<b>NET LOSS FOR THE YEAR</b>



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	2021	2020	
<b>PENGHASILAN KOMPREHENSIF LAIN:</b>			<b>OTHER COMPREHENSIVE INCOME:</b>
<b>Pos-pos yang akan direklasifikasi ke laba rugi</b>			<b>Items that would be reclassified to profit or loss</b>
Perubahan nilai wajar - efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	(67.821.027)	46.092.882	<i>Changes in fair value of marketable securities measured at fair value through other comprehensive income</i>
Pajak tangguhan terkait	<u>14.920.624</u>	<u>(8.796.603)</u>	<i>Related deferred income tax</i>
	<u>(52.900.403)</u>	<u>37.296.279</u>	
<b>Pos-pos yang tidak akan direklasifikasi ke laba rugi</b>			<b>Items that would never be reclassified to profit or loss</b>
Surplus revaluasi aset tetap	-	43.120.370	<i>Gain on revaluation of fixed asset</i>
Pajak penghasilan	<u>7.083.877</u>	<u>(7.083.877)</u>	<i>Income tax</i>
	<u>7.083.877</u>	<u>36.036.493</u>	
Pengukuran kembali atas liabilitias imbangan kerja	1.942.702	1.360.182	<i>Remeasurements on employee benefit liabilities</i>
Pajak tangguhan terkait	<u>(427.394)</u>	<u>(35.895)</u>	<i>Related deferred income tax</i>
	<u>1.515.308</u>	<u>1.324.287</u>	
<b>LABA/(RUGI) KOMPREHENSIF LAIN, SETELAH PAJAK PENGHASILAN</b>	<u>(44.301.218)</u>	<u>74.657.059</u>	<b>OTHER COMPREHENSIVE INCOME/ (LOSS) - NET OF INCOME TAX</b>
<b>JUMLAH RUGI PENGHASILAN KOMPREHENSIF</b>	<u>(163.364.716)</u>	<u>(177.536.620)</u>	<b>TOTAL OTHER COMPREHENSIVE LOSS</b>
<b>RUGI PER SAHAM</b>			<b>LOSS PER SHARE</b>
Dasar (Rupiah penuh)	(12,90)	(28,17)	<i>Basic (full Rupiah)</i>
Dilusian (Rupiah penuh)	(12,90)	(28,17)	<i>Diluted (full Rupiah)</i>

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**PT BANK VICTORIA INTERNATIONAL Tbk  
(PARENT ENTITY)  
STATEMENT OF CHANGES IN EQUITY  
FOR THE YEAR ENDED  
DECEMBER 31, 2021  
(Expressed in thousands of Rupiah, unless otherwise stated)**

	Modal ditempatkan dan disetor penuh/ <i>Issued and fully paid capital</i>	Tambahannya modal disetor/ <i>Additional paid-in capital</i>	Setoran Modal diterima dimuka/ <i>Capital received in advance</i>	Keuntungan yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak tangguhan/ <i>Unrealised gains on changes in fair value of marketable securities measured at fair value through other comprehensive income - net of tax</i>	Surplus revaluasi aset tetap - setelah pajak/ <i>Gain on revaluation of fixed assets - net of tax</i>	Pengukuran kembali atas liabilitas imbalan kerja - setelah pajak/ <i>Remeasurements on employee benefit liabilities - net of tax</i>	Saldo laba/ <i>Retained earnings</i>		Jumlah/ <i>Total</i>	
							Telah ditentukan penggunaannya/ <i>Appropriated</i>	Belum ditentukan penggunaannya/ <i>Unappropriated</i>		
<b>Saldo per 1 Januari 2021</b>	895.194.704	282.775.419	-	70.892.050	375.372.275	16.393.115	177.200.000	800.074.695	2.617.902.258	<b>Balance at January 1, 2021</b>
Dana setoran modal	153.518.553	126.274.397	278.000.000	-	-	-	-	-	557.792.950	<i>Capital deposit fund</i>
Biaya emisi efek	-	(1.263.889)	-	-	-	-	-	-	(1.263.889)	<i>Emission fund</i>
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain setelah pajak	-	-	-	(52.900.400)	-	-	-	-	(52.900.400)	<i>Financial assets measured fair value through other comprehensive income net of tax</i>
Surplus revaluasi aset tetap setelah pajak	-	-	-	-	7.083.877	-	-	-	7.083.877	<i>Gain on revaluation of fixed asset net of tax</i>
Pengukuran kembali atas liabilitas imbalan kerja, setelah pajak	-	-	-	-	-	1.515.307	-	-	1.515.307	<i>Remeasurements on employee benefit liabilities net of tax</i>
Rugi bersih tahun berjalan	-	-	-	-	-	-	-	(119.063.498)	(119.063.498)	<i>Net loss for the year</i>
<b>Saldo per 31 Desember 2021</b>	<b>1.048.713.257</b>	<b>407.785.927</b>	<b>278.000.000</b>	<b>17.991.650</b>	<b>382.456.152</b>	<b>17.908.422</b>	<b>177.200.000</b>	<b>681.011.197</b>	<b>3.011.066.605</b>	<b>Balance as at December 31, 2021</b>

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**PT BANK VICTORIA INTERNATIONAL Tbk  
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STATEMENT OF CHANGES IN EQUITY  
FOR THE YEAR ENDED  
DECEMBER 31, 2021  
(Expressed in thousands of Rupiah, unless otherwise stated)**

	Modal ditempatkan dan disetor penuh/ <i>Issued and fully paid capital</i>	Tambahannya modal disetor/ <i>Additional paid-in capital</i>	Keuntungan yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak tangguhan/ <i>Unrealised gains on changes in fair value of marketable securities measured at fair value through other comprehensive income - net of tax</i>	Surplus revaluasi aset tetap - setelah pajak/ <i>Gain on revaluation of fixed assets - net of tax</i>	Pengukuran kembali atas liabilitas imbalan kerja - setelah pajak/ <i>Remeasurements on employee benefit liabilities - net of tax</i>	Saldo laba/ <i>Retained earnings</i>		Jumlah/ <i>Total</i>	
						Telah ditentukan penggunaannya/ <i>Appropriated</i>	Belum ditentukan penggunaannya/ <i>Unappropriated</i>		
<b>Saldo per 1 Januari 2020</b>	895.194.704	282.775.419	33.595.771	339.335.782	15.068.828	177.200.000	1.242.339.160	2.985.509.664	<b>Balance as at January 1, 2020</b>
Penghasilan komprehensif lainnya:									<i>Other comprehensive income:</i>
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	-	-	37.296.279	-	-	-	-	37.296.279	<i>Financial assets measured fair value through other comprehensive income, net of tax</i>
Surplus revaluasi aset tetap, setelah pajak	-	-	-	36.036.493	-	-	13.008.581	49.045.074	<i>Gain on revaluation of fixed assets, net of tax</i>
Pengukuran kembali atas liabilitas imbalan kerja, setelah pajak	-	-	-	-	1.324.287	-	-	1.324.287	<i>Remeasurements on employee benefit liabilities</i>
Rugi bersih tahun berjalan	-	-	-	-	-	-	(252.193.679)	(252.193.679)	<i>Net loss for the year</i>
Dampak penerapan PSAK 71 dan 73 - bersih	-	-	-	-	-	-	(203.079.367)	(203.079.367)	<i>Impact on implementation of SFAS 71 and 73 - net</i>
<b>Saldo per 31 Desember 2020</b>	<b>895.194.704</b>	<b>282.775.419</b>	<b>70.892.050</b>	<b>375.372.275</b>	<b>16.393.115</b>	<b>177.200.000</b>	<b>800.074.695</b>	<b>2.617.902.258</b>	<b>Balance as at December 31, 2020</b>

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<b>PT BANK VICTORIA INTERNATIONAL Tbk (ENTITAS INDUK) LAPORAN ARUS KAS UNTUK TAHUN YANG BERAKHIR PADA 31 DESEMBER 2021 (Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)</b>	<b>31 Desember/ December 31,</b>		<b>PT BANK VICTORIA INTERNATIONAL Tbk (PARENT ENTITY) STATEMENT OF CASH FLOWS FOR THE YEAR ENDED DECEMBER 31, 2021 (Expressed in thousands of Rupiah, unless otherwise stated)</b>
	<u>2021</u>	<u>2020</u>	
<b>ARUS KAS DARI AKTIVITAS OPERASI</b>			<b>CASH FLOWS FROM OPERATING ACTIVITIES</b>
Penerimaan dari bunga dan komisi	1.342.025.021	1.578.206.249	<i>Receipt from Interest and commission income</i>
Pembayaran bunga	(1.114.884.732)	(1.483.832.563)	<i>Payment of interest</i>
Penerimaan operasional lainnya	430.949.342	477.767.904	<i>Receipt from other operating income</i>
Penerimaan dari penjualan agunan yang diambil alih	182.230.821	122.826.836	<i>Receipt from sale of foreclosed assets</i>
Pembayaran beban umum dan administrasi	(110.607.120)	(111.231.886)	<i>Payment of general and administrative expenses</i>
Pembayaran beban tenaga kerja	(134.560.665)	(158.887.117)	<i>Payment of personnel expenses</i>
Pembayaran beban operasional lainnya	(128.874.555)	(94.099.812)	<i>Payments of other operating expenses</i>
Pembayaran beban non-operasional lainnya	7.871.422	4.007.174	<i>Payment of other non-operating expense</i>
Pembayaran pajak penghasilan	-	(206.555)	<i>Payment of income tax</i>
Pembayaran pajak final atas revaluasi aset tetap	-	(376.412)	<i>Payment of final tax on fix asset's revaluation</i>
	<u>474.149.534</u>	<u>334.173.818</u>	
Penurunan/(kenaikan) dalam aset operasi:			<i>Decrease/(increase) in operating assets:</i>
Pinjaman yang diberikan	(1.394.006.686)	2.132.064.722	<i>Loans</i>
Efek-efek yang dijual dengan janji dibeli kembali	-	1.114.234.518	<i>Securities sales under repurchase agreements</i>
Efek-efek yang dibeli dengan janji dijual kembali	(242.909.770)	552.201.091	<i>Securities purchased under resale agreements</i>
Biaya dibayar dimuka	4.629.306	4.275.157	<i>Prepaid expenses</i>
Aset yang diambil alih	(44.312.072)	(549.885.879)	<i>Foreclosed assets</i>
Penyertaan saham	(4.520.082)	214.606	<i>Investment in shares</i>
Aset Hak Guna	(2.379.000)	(36.758.774)	<i>Right of use assets</i>
Aset lain-lain	8.568.719	6.710.939	<i>Other assets</i>
Kenaikan/(penurunan) dalam: kewajiban operasi:			<i>Increase/(decrease) on: operating liabilities:</i>
Simpanan nasabah	(8.142.608)	(3.688.258.154)	<i>Deposits from customers</i>
Simpanan dari bank lain	(793.016.169)	1.074.996.088	<i>Deposits from other banks</i>
Efek-efek yang dijual dengan janji dibeli kembali	-	(1.000.000.721)	<i>Securities sold under repurchase agreements</i>
Utang pajak lainnya	(8.193.501)	(7.972.866)	<i>Other tax payables</i>
<b>Arus kas bersih digunakan untuk aktivitas operasi</b>	<u><b>(2.010.132.329)</b></u>	<u><b>(64.005.455)</b></u>	<b>Cash flow used in from operating activities</b>
<b>ARUS KAS DARI AKTIVITAS INVESTASI</b>			<b>CASH FLOWS FROM INVESTING ACTIVITIES</b>
Hasil penjualan aset tetap	21.815.074	26.866.378	<i>Proceeds from sale of fixed assets</i>
Pembelian aset tetap	(1.093.083)	(2.454.190)	<i>Purchase of fixed assets</i>
Pembelian aset tak berwujud	(828.918)	(395.440)	<i>Purchase of intangible assets</i>
Surplus revaluasi aset tetap	-	(6.707.464)	<i>Revaluation surplus of fix asset</i>
Penjualan/(pembelian) efek-efek	<u>1.041.228.194</u>	<u>525.131.720</u>	<i>Sale/(purchase) of marketable securities</i>
<b>Arus kas bersih diperoleh dari aktivitas investasi</b>	<u><b>1.061.121.267</b></u>	<u><b>542.441.004</b></u>	<b>Net cash flow provided from investing activities</b>

**INFORMASI KEUANGAN ENTITAS INDUK/  
SUPPLEMENTARY FINANCIAL INFORMATION OF THE PARENT ENTITY**

<b>PT BANK VICTORIA INTERNATIONAL Tbk (ENTITAS INDUK) LAPORAN ARUS KAS UNTUK TAHUN-TAHUN YANG BERAKHIR PADA 31 DESEMBER 2021 (Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)</b>	<b>PT BANK VICTORIA INTERNATIONAL Tbk (PARENT ENTITY) STATEMENT OF CASH FLOWS FOR THE YEARS ENDED DECEMBER 31, 2021 (Expressed in thousands of Rupiah, unless otherwise stated)</b>	
	<b>31 Desember/ December 31,</b>	
	<b>2021</b>	<b>2020</b>
<b>ARUS KAS DARI AKTIVITAS PENDANAAN</b>		<b>CASH FLOWS FROM FINANCING ACTIVITIES</b>
Penambahan modal disetor	556.529.061	-
Pinjaman yang diterima	50.000.000	-
Penerbitan obligasi	-	60.000.000
Pelunasan jatuh tempo obligasi	(200.000.000)	(300.000.000)
Pembayaran sewa	(6.686.340)	(11.236.978)
	<u>399.842.721</u>	<u>(251.236.978)</u>
<b>Arus kas bersih diperoleh dari (digunakan untuk) aktivitas pendanaan</b>		<b>Net cash flow (used in)/provided from financing activities</b>
	<u>399.842.721</u>	<u>(251.236.978)</u>
<b>KENAIKAN/(PENURUNAN) BERSIH KAS DAN SETARA KAS</b>	<b>(549.168.341)</b>	<b>227.198.571</b>
		<b>NET INCREASE/(DECREASE) OF CASH AND CASH EQUIVALENT</b>
<b>KAS DAN SETARA KAS PADA AWAL TAHUN</b>	<b>2.210.291.925</b>	<b>1.983.093.354</b>
		<b>CASH AND CASH EQUIVALENTS AT BEGINNING OF YEAR</b>
<b>KAS DAN SETARA KAS PADA AKHIR TAHUN</b>	<b>1.661.123.584</b>	<b>2.210.291.925</b>
		<b>CASH AND CASH EQUIVALENTS AT END OF YEAR</b>
<b>Kas dan setara kas terdiri dari:</b>		<b>Cash and cash equivalent consist of:</b>
Kas	52.684.904	59.905.635
Giro pada Bank Indonesia	615.714.645	570.507.475
Giro Bank lain	401.871.737	182.708.000
Penempatan pada bank Bank Indonesia dan bank lain kurang dari 3 bulan	<u>590.852.298</u>	<u>1.397.170.815</u>
	<u>1.661.123.584</u>	<u>2.210.291.925</u>
<b>Jumlah kas dan setara kas</b>		<b>Total cash and cash equivalent</b>

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