



# 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.

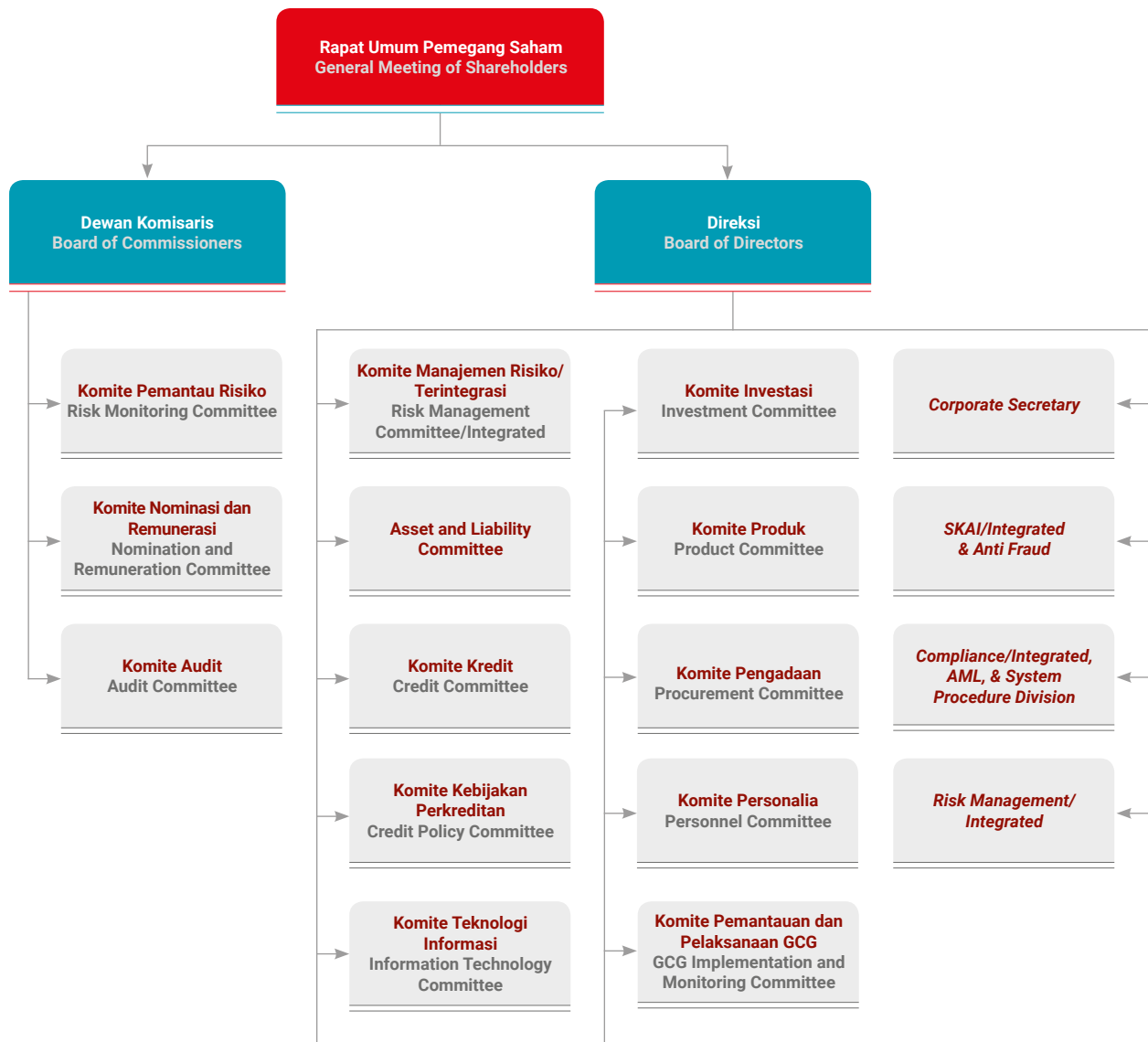


## Struktur dan Pedoman GCG

### 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.

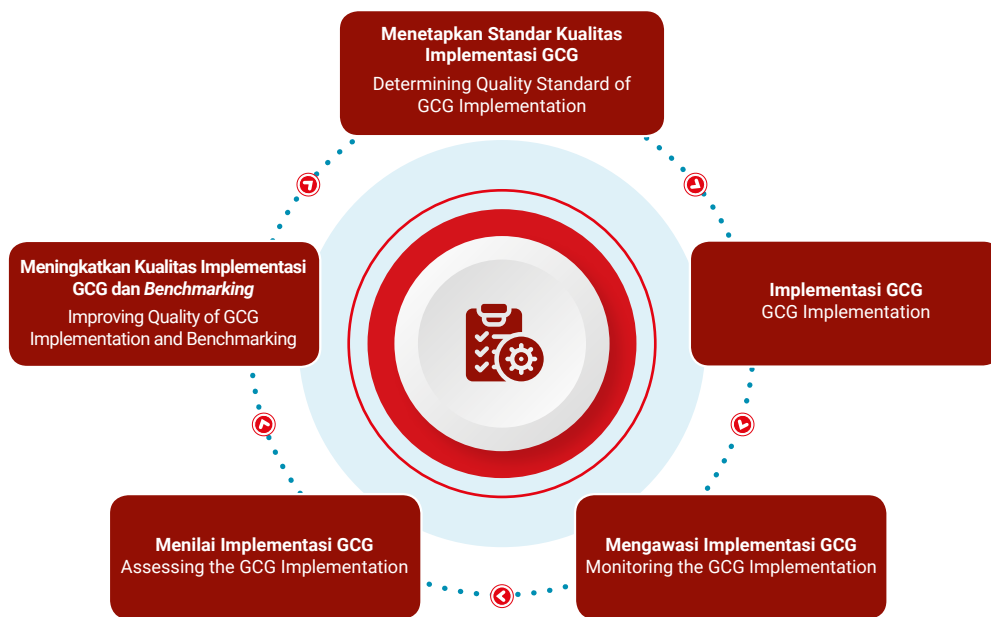




## Mekanisme Implementasi GCG GCG Implementation Mechanism

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 Ban; 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>1. 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>2. 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>1. 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>2. 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 Tangung 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 Wahjurtiro 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 Wahjurtirto 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</i> Grup 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</i> Hasil Pemeriksaan Audit Divisi <i>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</i> Grup 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>
<b>Komite Audit</b> 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> </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>
<b>Komite Pemantau Risiko</b> Risk Monitoring Committee	<ol style="list-style-type: none"> <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> <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>
<b>Komite Nominasi dan Remunerasi</b> 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 Wahjurtiro Tanoyo	Tamunan
4 Januari 2021 4 January 2021	<ol style="list-style-type: none"> <li>Arahan tahun 2021;</li> <li>Target kredit;</li> <li>Proyeksi <i>non-performing loan</i> 31 Desember 2020;</li> <li>Kinerja keuangan 31 Desember 2020; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Directions for 2021;</li> <li>Loan targets;</li> <li>Projections of non-performing loans 31 December 2020;</li> <li>Financial performance 31 December 2020; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
11 Januari 2021 11 January 2021	<ol style="list-style-type: none"> <li>Progres <i>pipeline</i> dan <i>booking</i>;</li> <li>Proyeksi <i>non-performing loan</i>;</li> <li>Kinerja keuangan 8 Januari 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Progress on pipeline and booking;</li> <li>Projections of non-performing loans;</li> <li>Financial performance 8 January 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
18 Januari 2021 18 January 2021	<ol style="list-style-type: none"> <li>Progres <i>pipeline</i> dan <i>booking</i>;</li> <li>Proyeksi <i>non-performing loan</i>;</li> <li>Kinerja keuangan 15 Januari 2021;</li> <li>Tinjau ulang kinerja; dan</li> <li>Paparan Direktorat.</li> </ol> <ol style="list-style-type: none"> <li>Progress on pipeline and booking;</li> <li>Projections of non-performing loans;</li> <li>Financial performance 15 January 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
25 Januari 2021 25 January 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> 30 Desember 2020;</li> <li>Kinerja keuangan 22 Januari 2021; 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 December 2020;</li> <li>Financial performance 22 January 2021; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
1 Februari 2021 1 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> 30 Desember 2020;</li> <li>Kinerja keuangan 31 Januari 2021; 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 December 2020;</li> <li>Financial performance 31 January 2021; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
9 Februari 2021 9 February 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> 28 Februari 2021;</li> <li>Kinerja keuangan 5 Februari 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 28 February 2021;</li> <li>Financial performance of 5 February 2021; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓
15 Februari 2021 15 February 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>;</li> <li>Kinerja keuangan 11 Februari 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;</li> <li>Financial performance 11 February 2021;</li> <li>Performance review; and</li> <li>Directorate presentation.</li> </ol>	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtiro Tanoyo	Tamunan
22 Februari 2021 22 February 2021	1. Pergerakan, <i>pipeline</i> , dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> ; 3. Kinerja keuangan 19 Februari 2021; 4. Tinjau ulang kinerja; dan 5. Paparan Direktorat.  1. Movement, pipeline, and monitoring of loans; 2. Projections of non-performing loans; 3. Financial performance 19 February 2021; 4. Performance review; and 5. Directorate presentation.	✓	✓	✓	✓	✓
1 Maret 2021 1 March 2021	1. Pergerakan, <i>pipeline</i> , dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 28 Februari 2021; 3. Kinerja keuangan 28 Februari 2021; 4. Tinjau ulang kinerja; dan 5. Paparan Direktorat.  1. Movement, pipeline, and monitoring of loans; 2. Projections of non-performing loans 28 February 2021; 3. Financial performance 28 February 2021; 4. Performance review; and 5. Directorate presentation.	✓	✓	✓	✓	✓
8 Maret 2021 8 March 2021	1. Pergerakan, <i>pipeline</i> , dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 31 Maret 2021; 3. Kinerja keuangan 5 Maret 2021; 4. Tinjau ulang kinerja; dan 5. Paparan Direktorat.  1. Movement, pipeline, and monitoring of loans; 2. Projections of non-performing loans 31 March 2021; 3. Financial performance 5 March 2021; 4. Performance review; and 5. Directorate presentation.	✓	✓	✓	✓	✓
15 Maret 2021 15 March 2021	1. Pergerakan, mutasi, <i>pipeline</i> , dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 31 Maret 2021; 3. Kinerja keuangan 12 Maret 2021; 4. Tinjau ulang <i>strategic performance management</i> ; dan 5. Paparan Direktorat.  1. Movement, transfer, pipeline, and monitoring of loans; 2. Projections of non-performing loans 31 March 2021; 3. Financial performance 12 March 2021; 4. Review of strategic performance management; and 5. Directorate presentation.	✓	✓	✓	- (Dinas Luar Kota) (Out-of-Town Duty)	✓
22 Maret 2021 22 March 2021	1. Pergerakan, mutasi, <i>pipeline</i> , dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 31 Maret 2021; 3. Kinerja keuangan 19 Maret 2021; 4. Tinjau ulang <i>strategic performance management</i> ; dan 5. Paparan Direktorat.  1. Movement, transfer, pipeline, and monitoring of loans; 2. Projections of non-performing loans 31 March 2021; 3. Financial performance 19 March 2021; 4. Review of strategic performance management; and 5. Directorate presentation.	✓	✓	✓	✓	✓
29 Maret 2021 29 March 2021	1. Pergerakan, mutasi, <i>pipeline</i> , dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 31 Maret 2021; 3. Kinerja keuangan 26 Maret 2021; 4. Tinjau ulang <i>strategic performance management</i> ; dan 5. Paparan Direktorat.  1. Movement, transfer, pipeline, and monitoring of loans; 2. Projections of non-performing loans 31 March 2021; 3. Financial performance 26 March 2021; 4. Review of strategic performance management; and 5. Directorate presentation.	✓	✓	✓	✓	✓

Tanggal Date	Agenda	Ahmad Fajar	Rusli	Lembing	Debora Wahjurtito Tanoyo	Tamunan
5 April 2021	<p>1. Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 30 April 2021; 3. Kinerja Keuangan 31 Maret 2021; 4. Tinjau ulang <i>strategic performance management</i>; dan 5. Paparan Direktorat.</p> <p>1. Movement, transfer, pipeline, and monitoring of loans; 2. Projections of non-performing loans 30 April 2021; 3. Financial performance 31 March 2021; 4. Review of strategic performance management; and 5. Directorate presentation.</p>	✓	✓	✓	✓	✓
12 April 2021	<p>1. Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 30 April 2021; 3. Kinerja keuangan 9 April 2021; 4. Tinjau ulang <i>strategic performance management</i>; dan 5. Paparan Direktorat.</p> <p>1. Movement, transfer, pipeline, and monitoring of loans; 2. Projections of non-performing loans 30 April 2021; 3. Financial performance 9 April 2021; 4. Review of strategic performance management; and 5. Directorate presentation.</p>	✓	✓	✓	✓	✓
19 April 2021	<p>1. Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 30 April 2021; 3. Kinerja keuangan 16 April 2021; 4. Tinjau ulang <i>strategic performance management</i>; dan 5. Paparan Direktorat.</p> <p>1. Movement, transfer, pipeline, and monitoring of loans; 2. Projections of non-performing loans 30 April 2021; 3. Financial performance 16 April 2021; 4. Review of strategic performance management; and 5. Directorate presentation.</p>	✓	✓	✓	✓	✓
26 April 2021	<p>1. Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 30 April 2021; 3. Kinerja keuangan 23 April 2021; 4. Tinjau ulang <i>strategic performance management</i>; dan 5. Paparan Direktorat.</p> <p>1. Movement, transfer, pipeline, and monitoring of loans; 2. Projections of non-performing loans 30 April 2021; 3. Financial performance 23 April 2021; 4. Review of strategic performance management; and 5. Directorate presentation.</p>	✓	✓	✓	✓	✓
3 Mei 2021 3 May 2021	<p>1. Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 30 April 2021; 3. Kinerja keuangan 30 April 2021; 4. Tinjau ulang <i>strategic performance management</i>; dan 5. Paparan Direktorat.</p> <p>1. Movement, transfer, pipeline, and monitoring of loans; 2. Projections of non-performing loans 30 April 2021; 3. Financial performance 30 April 2021; 4. Review of strategic performance management; and 5. Directorate presentation.</p>	✓	✓	✓	✓	✓
10 Mei 2021 10 May 2021	<p>1. Pergerakan, mutasi, <i>pipeline</i>, dan <i>monitoring</i> kredit; 2. Proyeksi <i>non-performing loan</i> 31 Mei 2021; 3. Kinerja keuangan 7 Mei 2021; 4. Tinjau ulang <i>strategic performance management</i>; dan 5. Paparan Direktorat.</p> <p>1. Movement, transfer, pipeline, and monitoring of loans; 2. Projections of non-performing loans 31 May 2021; 3. Financial performance 7 May 2021; 4. Review of strategic performance management; and 5. Directorate presentation.</p>	✓	✓	✓	- (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 Pekreditan 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.

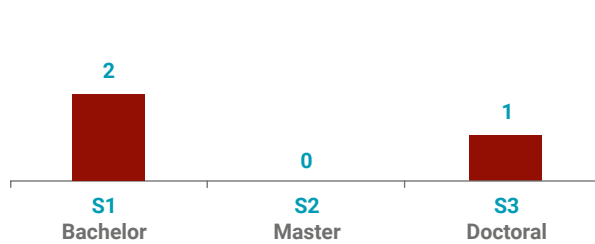
## Pencapaian Kebijakan Keberagaman Komposisi Dewan Komisaris dan Direksi

## Achievement of Diversity Policy of the Board of Commissioners and Board of Directors' Composition

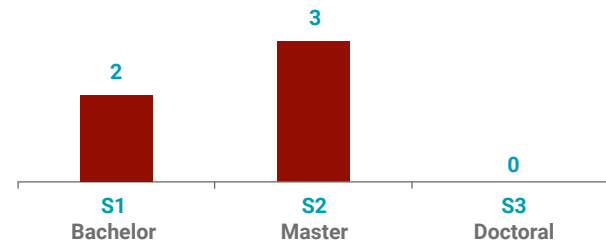
### Latar Belakang Pendidikan Dewan Komisaris dan Direksi

Board of Commissioners and Board of Directors' Educational Background

**Latar Belakang Pendidikan Dewan Komisaris**  
Board of Commissioners' Educational Background



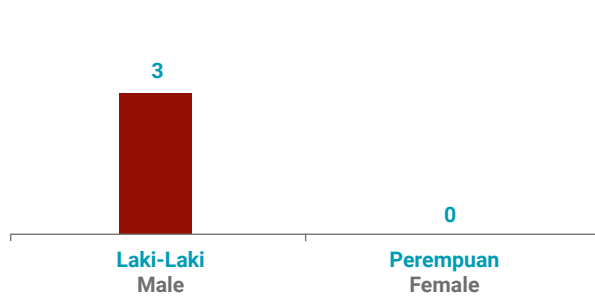
**Latar Belakang Pendidikan Direksi**  
Board of Directors' Educational Background



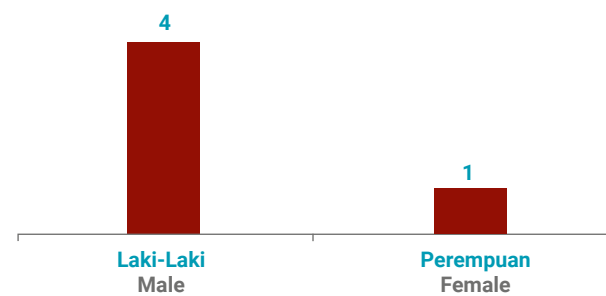
### Gender Dewan Komisaris dan Direksi

Board of Commissioners and Board of Directors' Gender

**Gender Dewan Komisaris**  
Board of Commissioners' Gender



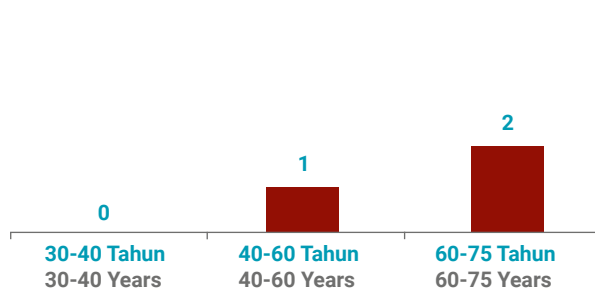
**Gender Direksi**  
Board of Directors' Gender



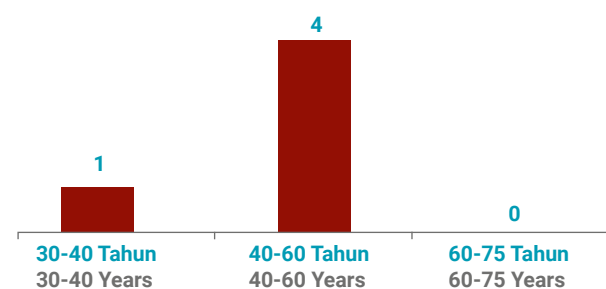
### Usia Dewan Komisaris dan Direksi

Board of Commissioners and Board of Directors' Age

**Usia Dewan Komisaris**  
Board of Commissioners' Age



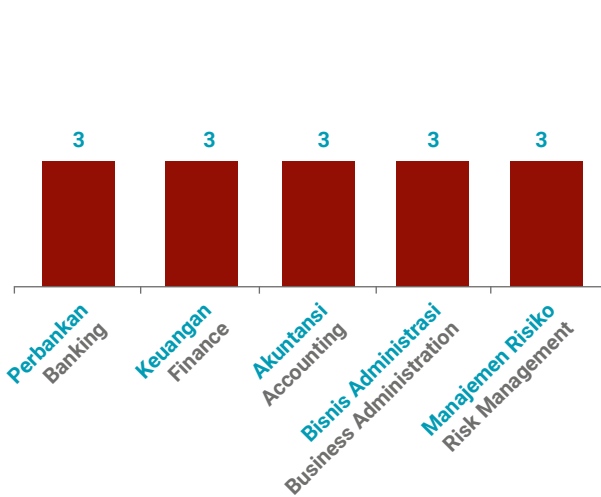
**Usia Direksi**  
Board of Directors' Age



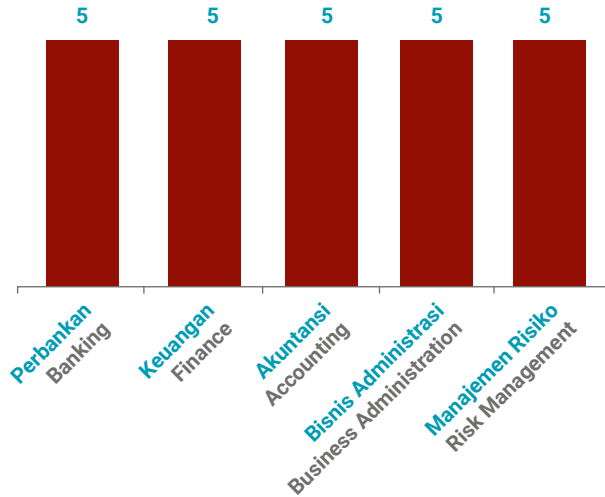
**Pengalaman Kerja Dewan Komisaris dan Direksi**

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.

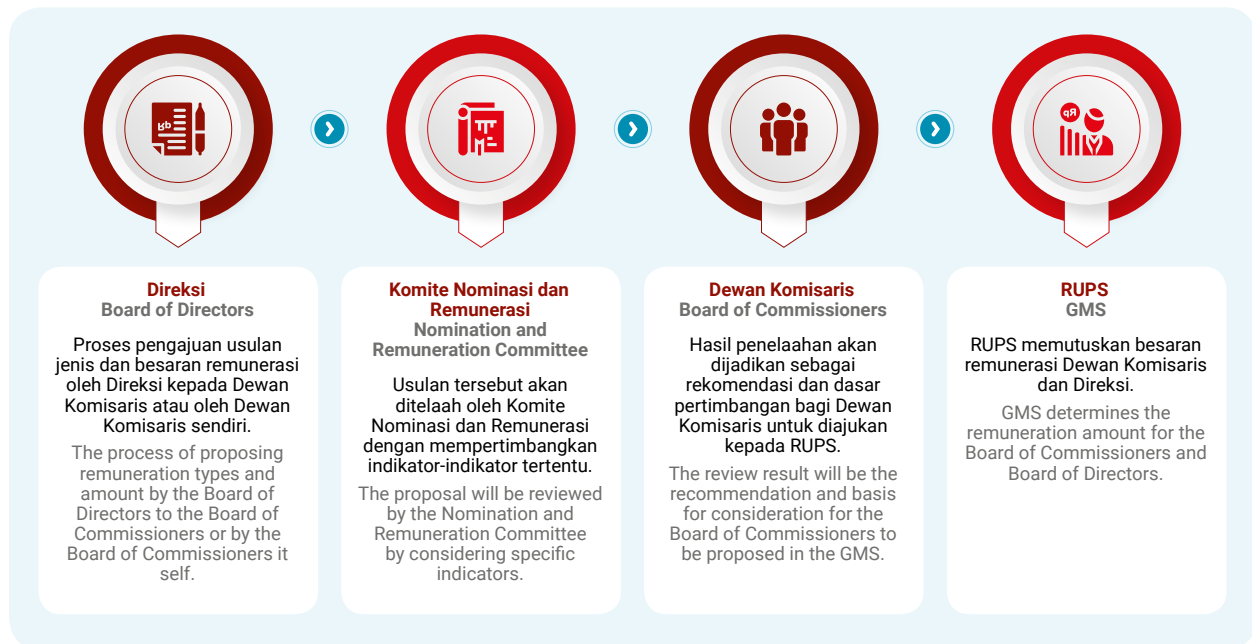
## Dasar dan Kebijakan Remunerasi Dewan Komisaris dan Direksi

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.

<b>Tugas dan Tanggung Jawab Duties and Responsibilities</b>	<b>Realisasi 2021 2021 Realization</b>
Penelaahan dan klarifikasi atas informasi keuangan. Review and clarify the financial information.	Melaksanakan penelaahan dan peninjauan, baik melalui laporan maupun melalui rapat yang hasilnya disampaikan kepada Dewan Komisaris, seperti: 1. Penelaahan Laporan Keuangan serta pengendalian internal posisi Desember 2020; 2. Penelaahan tren pertumbuhan kinerja usaha periode Maret 2021 dan Pencapaian Rencana Bisnis Bank triwulan I 2021; 3. Penelaahan tren pertumbuhan kinerja usaha periode Juni 2021 dan pencapaian Rencana Bisnis Bank triwulan II 2021; 4. Penelaahan tren pertumbuhan kinerja usaha periode September 2021 dan pencapaian Rencana Bisnis Bank triwulan III 2021.  Reviewing and studying, through reports and meetings whose results were submitted to the Board of Commissioners, such as: 1. Review of Financial Statements and internal control for December 2020 position; 2. Review of business performance growth trend for March 2021 period and Bank Business Plan achievement quarter I 2021; 3. Review of business performance growth trend for June 2021 period and Bank Business Plan achievement quarter II 2021; 4. Review of business performance growth trend for September 2021 period and Bank Business Plan achievement quarter III 2021;
Seleksi, penunjukan, dan pengawasan pekerjaan auditor independen. Select, appoint, and monitor the work of the independent auditor.	Menunjuk Kantor Akuntan Publik Purwanto, Sungkoro & Surja sebagai auditor independen.  Appointing Public Accounting Firm Purwanto, Sungkoro & Surja as the independent auditor.
Evaluasi efektivitas pelaksanaan pekerjaan auditor independen. Evaluating the effectiveness of implementation of independent auditor function.	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.
Evaluasi efektivitas pelaksanaan fungsi audit internal. Evaluate the effectiveness of implementation of internal audit function.	Melakukan penelaahan dan klarifikasi atas evaluasi efektivitas pelaksanaan fungsi audit internal.  Reviewing and clarifying the evaluation of effectiveness of internal audit function implementation.
Efektivitas pengendalian internal. Effectiveness of internal control.	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.
Kepatuhan terhadap peraturan perundang-undangan. Compliance with laws and regulations.	Memastikan kepatuhan Bank terhadap peraturan perundang-undangan. Ensuring the Bank's compliance with laws and regulations.



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 Purwanto, 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 Purwanto, 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
Penyusunan kebijakan, strategi, dan pedoman penerapan manajemen risiko. Preparation of policies, strategies, and guidelines for risk management implementation.	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.  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.

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.

### Composition of Risk Management Committee

The composition of the Bank's Risk Management Committee is based on the Board of Directors' Decision Letter No. 014/SK-DIR/10/17 is described as follows.

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>1. Direksi</li> <li>2. Associate Directors</li> <li>3. Kepala Divisi Risk Management/Integrated (Secretary)</li> <li>4. Kepala Divisi SKAI/Integrated &amp; Anti Fraud</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.

### 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.

Adapun agenda rapat atau yang dibahas di antaranya sebagai berikut.

1. Tindak lanjut saran pendapat Manajemen;
2. *Trends risk* dan pemantauan limit kredit berdasarkan sektor ekonomi;
3. *Risk register*;
4. *Value at risk*;
5. *Peer group*;
6. *Stress test*;
7. Profil risiko;
8. *Risk Based Bank Rating* (RBBR); dan
9. Pendapat dan saran anggota Komite.

The agenda for meeting or discussion is as follows.

1. Follow-up on Management's opinion and suggestions;
2. Trends of risk and monitoring of credit limits by economic sector;
3. Risk register;
4. Value at risk;
5. Peer group;
6. Stress test;
7. Risk profile;
8. Risk Based Bank Rating (RBBR); and
9. 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> <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 Credit Risk Review Division</li> </ol> </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. 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> <ol style="list-style-type: none"> <li>1. SEVP of Corporate &amp; Commercial Banking</li> <li>2. Head of SME Banking Division</li> <li>3. Head of Multifinance &amp; Consumer Banking Division</li> <li>4. Head of International Banking Division</li> <li>5. Head of Special Asset Management Division</li> </ol> </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 pengganti 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 of 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.

## 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
<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>

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>

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	<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>

Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	<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) untuk situs web dan 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 ILicense 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>Komisaris Utama</li> <li>Direktur Utama</li> <li>Direktur Kepatuhan dan Manajemen Risiko</li> <li>Kepala Divisi <i>Credit Risk Review</i></li> <li>Kepala Divisi <i>Treasury</i></li> </ol> <ol style="list-style-type: none"> <li>President Commissioner</li> <li>President Director</li> <li>Director of Compliance and Risk Management</li> <li>Head of Credit Risk Review Division</li> <li>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> .

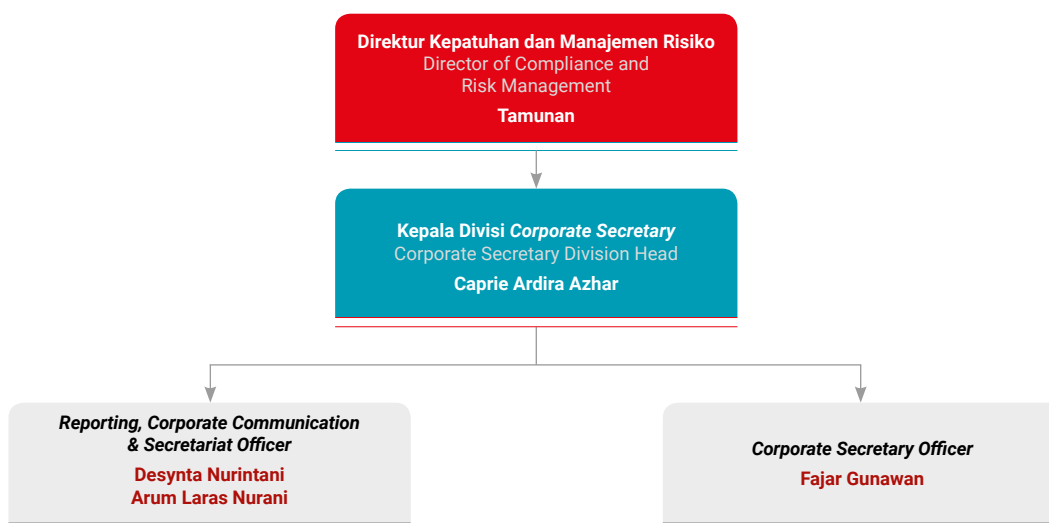
Tugas dan Tanggung Jawab Duties and Responsibilities	Realisasi 2021 2021 Realization
	<p>2. Laporan Eksternal</p> <ol style="list-style-type: none"> <li>Laporan Registrasi Pemegang Saham sebanyak 12 kali ke situs web Bursa Efek Indonesia;</li> <li>Laporan Keterbukaan Informasi pada situs web Bursa Efek 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/Integrated & Anti Fraud SKAI/Integrated & Anti Fraud Charter	Uraian Description
Piagam Audit Internal Internal Audit Charter	SKAI/Integrated & Anti Fraud 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/Integrated & Anti Fraud.  SKAI/Integrated & Anti Fraud 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/Integrated & Anti Fraud.
Sistem Prosedur dan Teknik Pemeriksaan Internal Systems Procedures, and Techniques of Internal Audit	Sistem Prosedur dan Teknik Pemeriksaan Internal merupakan pedoman kerja teknis SKAI/Integrated & Anti Fraud. 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.  The Systems, Procedures, and Techniques of Internal Audit is the technical work guideline for the SKAI/Integrated & Anti Fraud. 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.
Kebijakan SKAI/Integrated SKAI/Integrated Policy	Dalam rangka implementasi SKAI/Integrated 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.  For the purpose of the implementation of SKAI/Integrated 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.

<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.

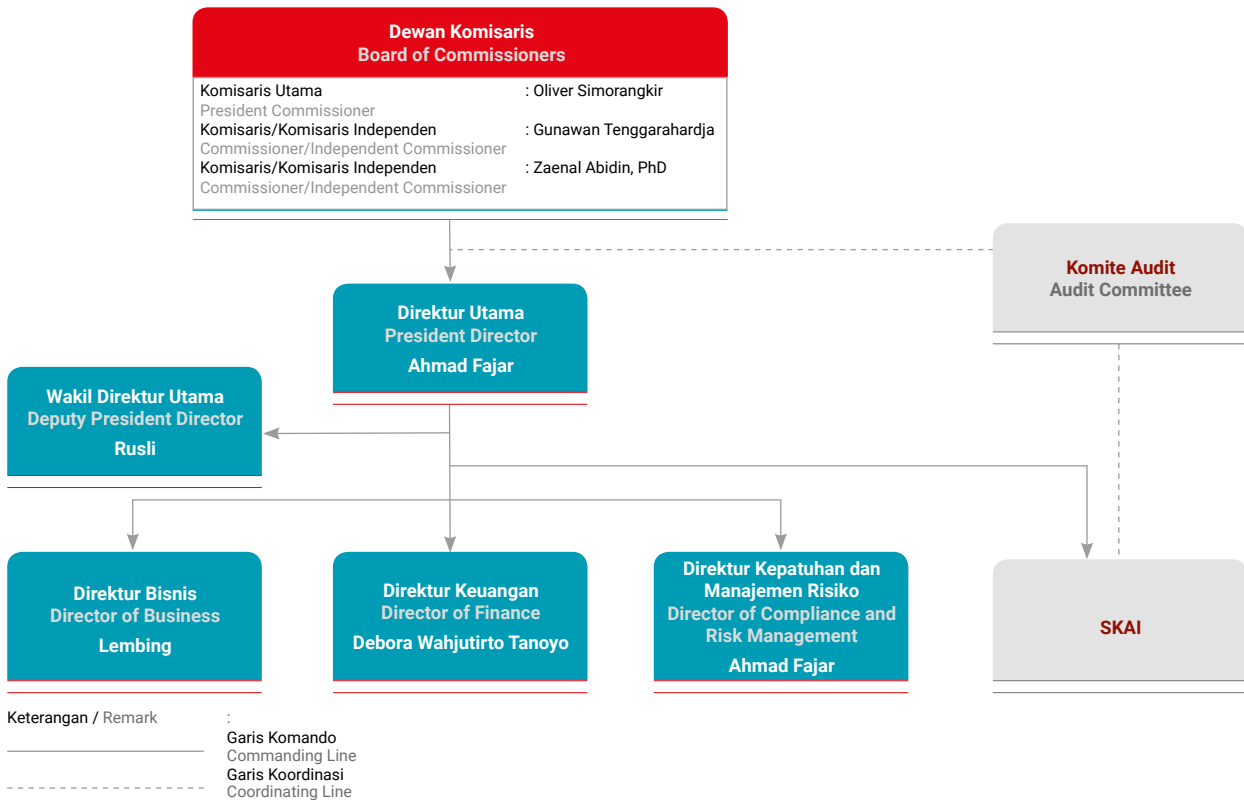
### Duties and Responsibilities of the SKAI/Integrated & Anti Fraud

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 nya

## 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.

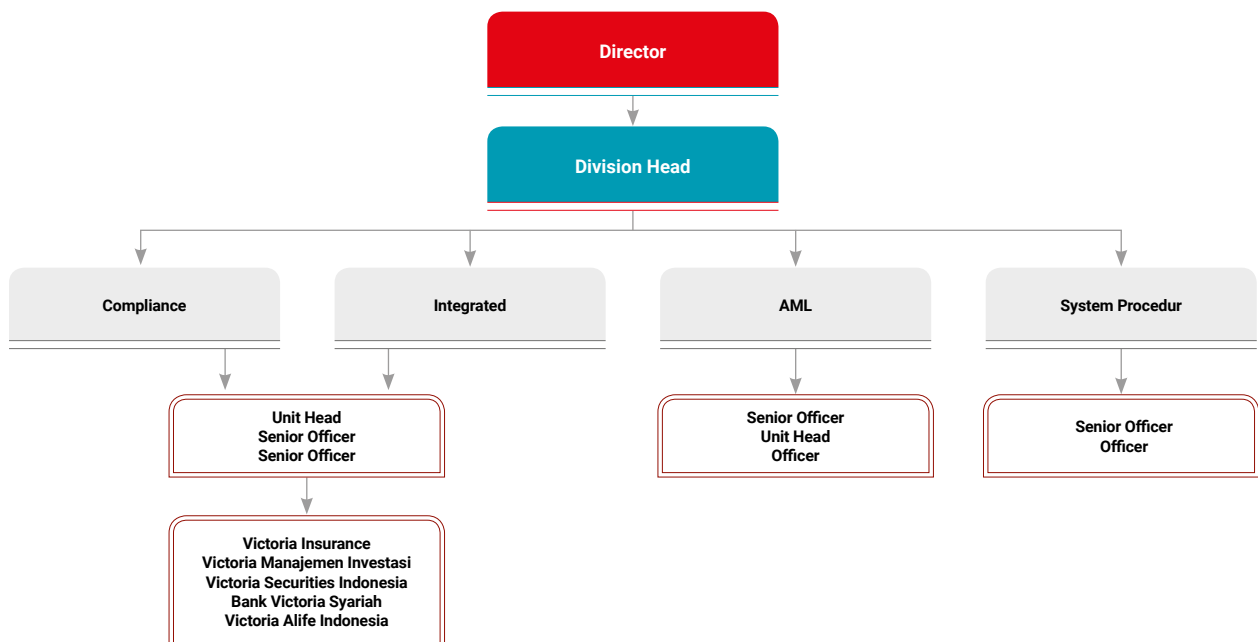
Divisi *Compliance/Integrated, AML & System Procedure* melaporkan seluruh aktivitasnya dalam melaksanakan tugas dan tanggung jawabnya langsung kepada Direktur Kepatuhan dan Manajemen Risiko, baik secara individu maupun secara terintegrasi.

- 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>	<ol style="list-style-type: none"> <li>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</li> <li>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.</li> </ol> <ol style="list-style-type: none"> <li>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</li> <li>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.</li> </ol> <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 PPATK 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. E-mail; 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:

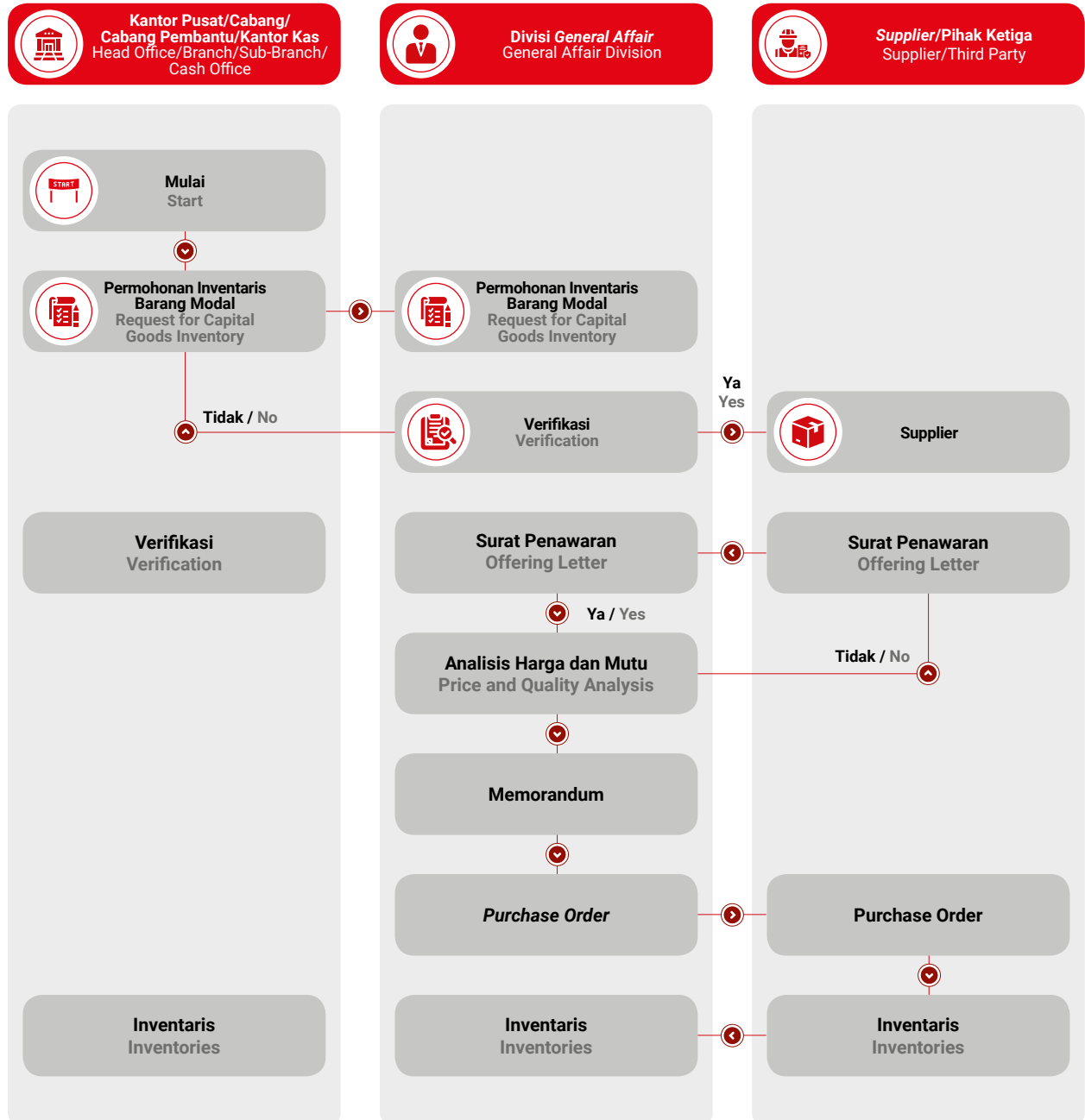


## Prosedur Pengadaan Barang dan Jasa

## 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)</b> <b>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</b> <b>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. Wiyan 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.

**Perkara / Case**  
**No. Laporan Polisi LP/4745/IX/2018/PMJ/Dit.Reskrim tanggal 7 September 2018**  
**Police Report No. LP/4745/IX/2018/PMJ/Dit.Reskrim dated 7 September 2018**

Para Pihak Parties	Pelapor Reporting Party : PT Panah Jaya Steel 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 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.

**Perkara / Case**  
**No. 73/Pailit/2012/PN.Niaga.Jkt.Pst tanggal 21 Maret 2013**  
**No. 73/Pailit/2012/PN.Niaga.Jkt.Pst dated 21 March 2013**

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 Petitioner II : Yana Surya, SE (as the owner of customer guarantee of PT Yoga Mandiri Utama)
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.

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. 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;

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 disebarakan 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 terjamin;
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.

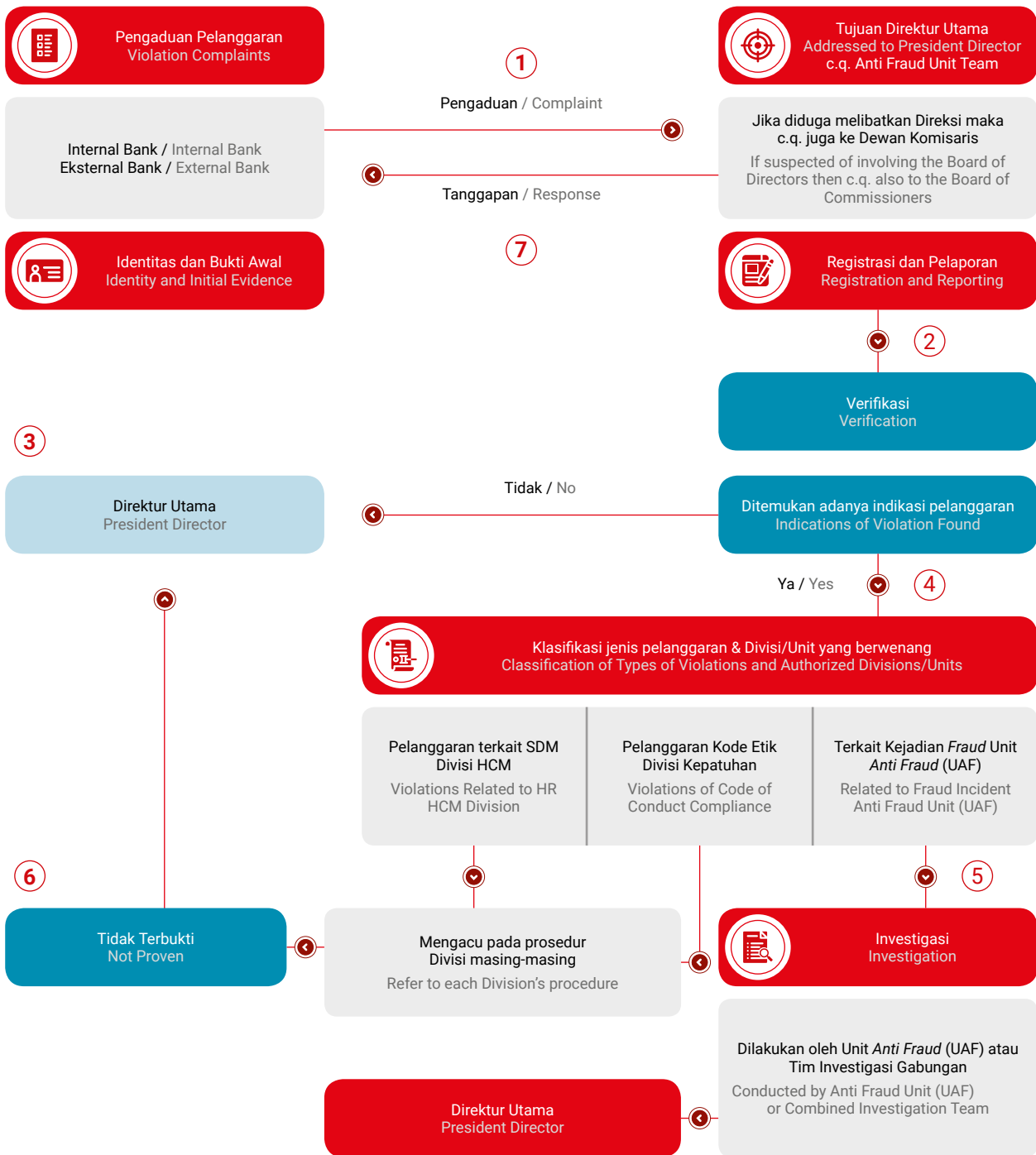
## Media and Parties Managing Violations

Bank Victoria applies whistleblowing media which comprises several methods.

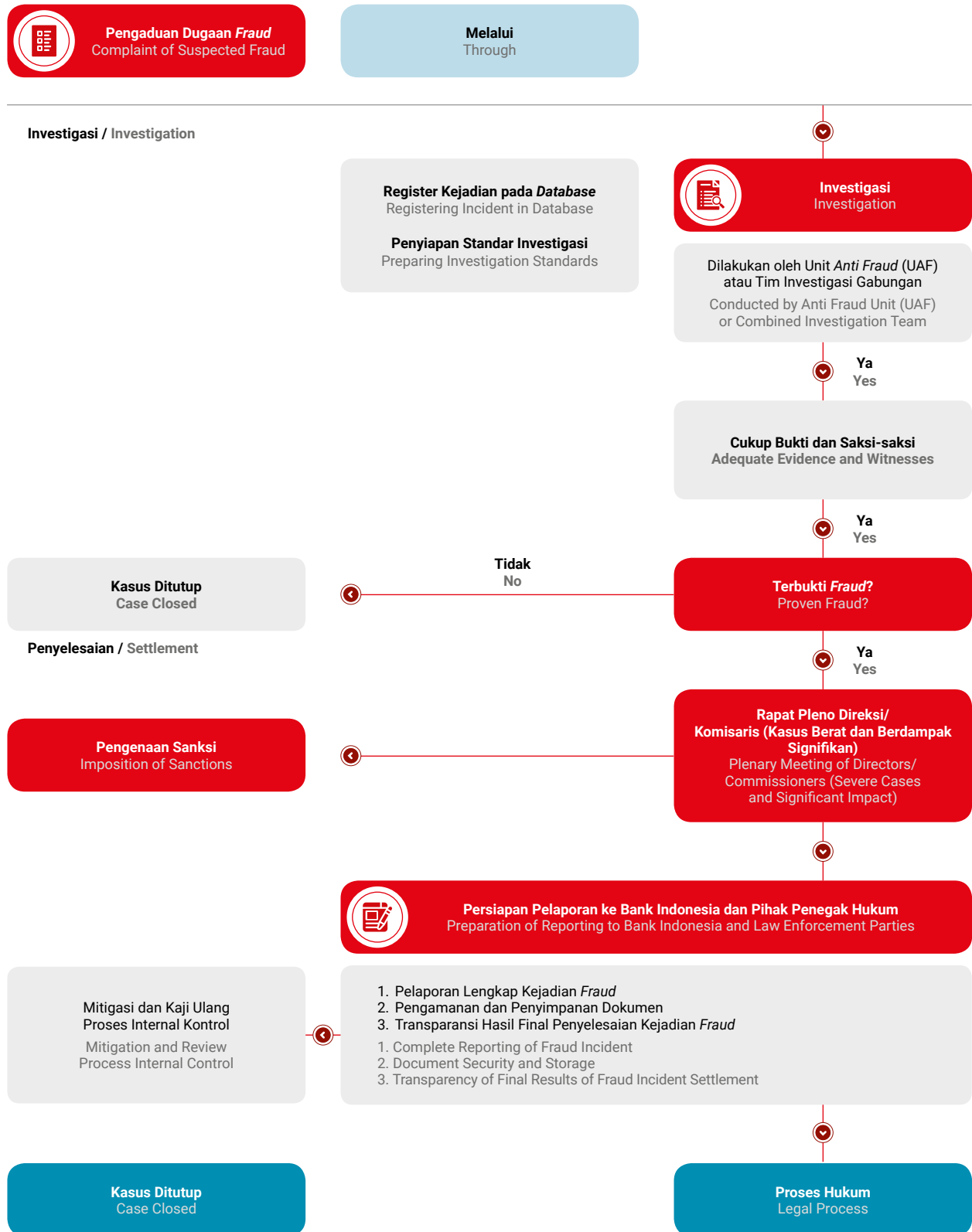
Pelaku Pelanggaran Violator	Media dan Pengelola Pelanggaran Media and Violation Handler
Karyawan Bank Bank Employees	<p>Penyampaian pengaduan pelanggaran ditujukan kepada Tim <i>Anti Fraud</i>. Laporan pelanggaran dapat dilakukan secara lisan, melalui surat, <i>e-mail</i>, atau sms kepada Tim <i>Anti 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:






<p><b>CAPRIE ARDIRA AZHAR</b> <i>Corporate Secretary</i></p>		<p><b>Gedung Graha BIP Lt. 10</b> <b>Graha BIP Building 10<sup>th</sup> Floor</b> Jl. Gatot Subroto Kav. 23 Jakarta Selatan, 12930</p>	
	(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
<b>Media sosial / Social Media</b>			
	@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>

Status dan Realisasi Status and Realization	<p><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.</p> <p><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.</p>
Rekomendasi 5 Recommendation 5	<p><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></p>
Uraian Rekomendasi Description Recommendation	<p>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.</p> <p>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.</p>
Status dan Realisasi Status and Realization	<p><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.</p> <p><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.</p>

## 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.

Rekomendasi 6 Recommendation 6	<p><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></p>
Uraian Rekomendasi Description Recommendation	<p>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.</p> <p>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.</p>
Status dan Realisasi Status and Realization	<p><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.</p> <p><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.</p>

<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 kolegial. Penilaian sendiri dilakukan oleh masing-masing anggota untuk menilai pelaksanaan kinerja Dewan Komisaris secara kolegial, 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.**

<b>Rekomendasi 12</b> Recommendation 12	<p><b>Penentuan jumlah anggota Direksi mempertimbangkan kondisi perusahaan terbuka serta efektivitas dalam pengambilan keputusan.</b></p> <p>The determination of number of Board of Directors' members considers the Public Company's condition and the effectiveness of decision making.</p>
Uraian Rekomendasi Description Recommendation	<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>
Status dan Realisasi Status and Realization	<p><b>Terpenuhi</b></p> <p>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></p> <p>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>
<b>Rekomendasi 13</b> Recommendation 13	<p><b>Penentuan komposisi anggota Direksi memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.</b></p> <p>The determination of Board of Directors' composition considers range of expertise, knowledge, and experience required.</p>
Uraian Rekomendasi Description Recommendation	<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>
Status dan Realisasi Status and Realization	<p><b>Terpenuhi</b></p> <p>Komposisi anggota Direksi telah memperhatikan keberagaman keahlian, pengetahuan dan pengalaman yang dibutuhkan oleh Bank.</p> <p><b>Complied</b></p> <p>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.

<b>Rekomendasi 24</b> Recommendation 24	<p><b>Perusahaan terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs web sebagai media keterbukaan informasi.</b></p> <p>The public company utilizes the use of information technology more broadly, in addition to the website, as a media of information disclosure.</p>
Uraian Rekomendasi Description Recommendation	<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>
Status dan Realisasi Status and Realization	<p><b>Terpenuhi</b></p> <p>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></p> <p>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>
<b>Rekomendasi 25</b> Recommendation 25	<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></p> <p>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>
Uraian Rekomendasi Description Recommendation	<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>
Status dan Realisasi Status and Realization	<p><b>Terpenuhi</b></p> <p>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></p> <p>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