



TATA KELOLA PERUSAHAAN

Good Corporate Governance





Dasar dan Prinsip Implementasi GCG

Basis and Principles of GCG Implementation

Bank Victoria menerapkan tata kelola perusahaan yang baik (*good corporate governance/GCG*) dengan merujuk pada undang-undang, peraturan Otoritas Jasa Keuangan, dan prinsip-prinsip umum GCG. Pada tahun 2023, Bank menyambut baik pengembangan Pedoman Governansi Korporat Indonesia (PUGKI) oleh Komite Nasional Kebijakan Governansi (KNKG) yang dirilis pada tahun 2021 dan menjadi standar penerapan GCG Bank.

Prinsip-prinsip dalam PUGKI 2021 beserta rekomendasi dan panduan di dalamnya dijiwai oleh 4 (empat) pilar governansi korporat, yaitu perilaku beretika, akuntabilitas, transparansi, dan keberlanjutan. Pilar governansi tersebut merupakan perkembangan terkini dari nilai dasar transparansi, akuntabilitas, responsibilitas, independensi, dan kewajaran dan kesetaraan.

Bank Victoria implements good corporate governance (GCG) by referring to laws, Financial Services Authority regulations, and general GCG principles. In 2023, the Bank welcomed the development of the General Guidelines for Indonesian Corporate Governance (PUGKI) by the National Committee for Governance Policy (KNKG) which was released in 2021 and made the standard for implementing the Bank's GCG.

The principles in PUGKI 2021 along with the recommendations and guidelines stated therein are inspired by 4 (four) pillars of corporate governance, namely ethical behavior, accountability, transparency, and sustainability. These governance pillars are the latest developments of basic values of transparency, accountability, responsibility, independence, and fairness and equality.

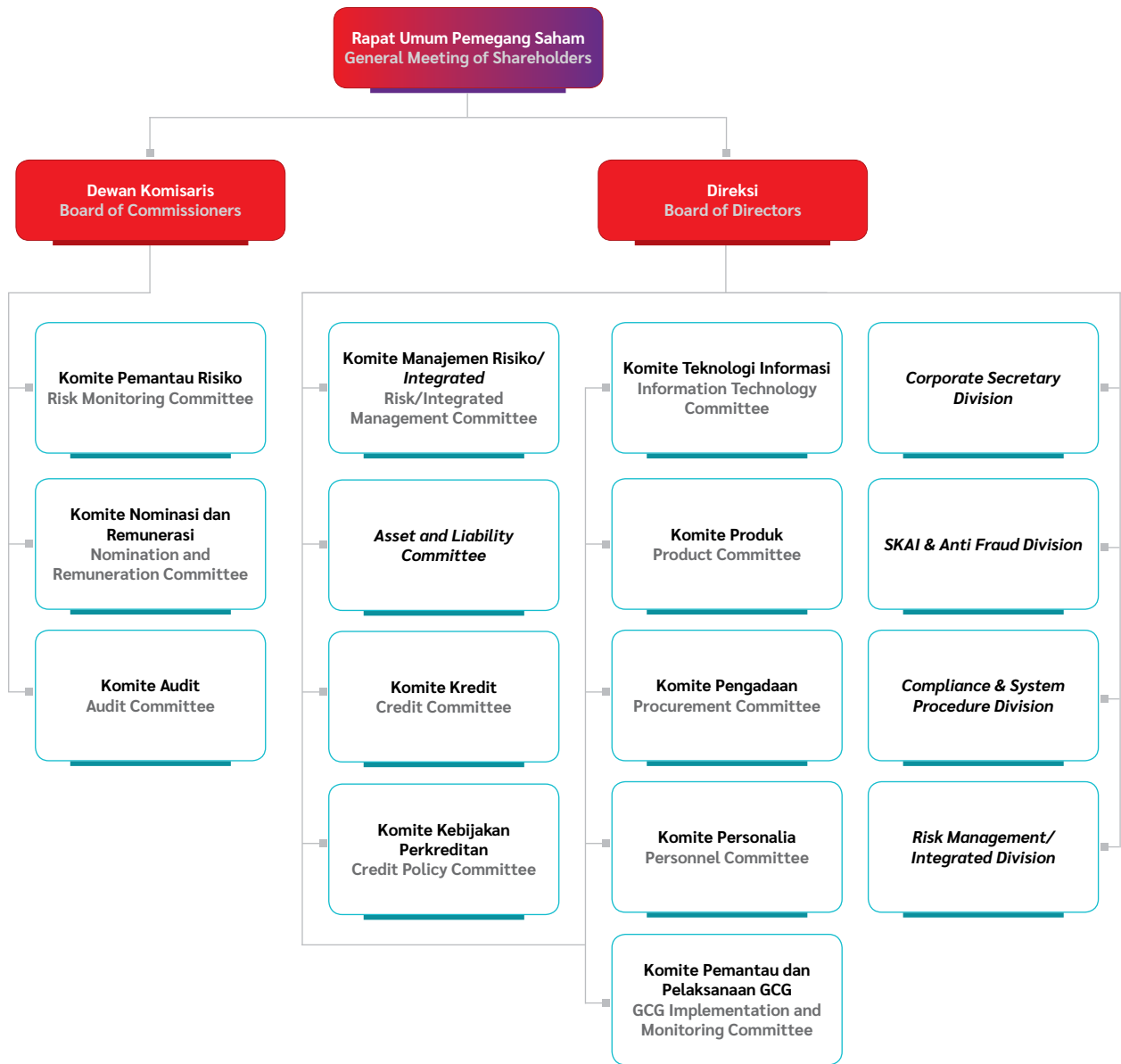
Pilar Governansi Governance Pillars	Implementasi Implementation
Perilaku Beretika Ethical Conduct	Bank senantiasa mengedepankan kejujuran, memperlakukan semua pihak dengan hormat, memenuhi komitmen, membangun serta menjaga nilai-nilai moral dan kepercayaan secara konsisten. Bank memperhatikan kepentingan Pemegang Saham dan pemangku kepentingan lainnya berdasarkan asas kewajaran dan kesetaraan dan dikelola secara independen sehingga masing-masing organ Bank tidak saling mendominasi dan tidak dapat diintervensi oleh pihak lain. The Bank always prioritizes honesty, treats all parties with respect, fulfills its commitments, as well as consistently builds and maintains moral values and beliefs. The Bank pays attention to the interests of Shareholders and other stakeholders based on the principle of fairness and equality, and each organ of the Bank is managed independently so that it does not dominate the other and cannot be intervened by other parties.
Akuntabilitas Accountability	Bank dapat mempertanggungjawabkan kinerja secara transparan dan wajar. Untuk itu Bank dikelola secara benar, terukur dan sesuai dengan kepentingan Bank dengan tetap memperhitungkan kepentingan Pemegang Saham dan pemangku kepentingan. Akuntabilitas merupakan prasyarat yang diperlukan untuk mencapai kinerja yang berkelanjutan. The Bank is accountable for its performance in a transparent and fair manner. For this reason, the Bank is managed properly, measurably, and in accordance with the Bank's interests, while still considering the interests of Shareholders and stakeholders. Accountability is the prerequisite needed to achieve the sustainable performance.
Transparansi Transparency	Bank menyediakan informasi yang material dan relevan dengan cara yang mudah diakses dan dipahami oleh pemangku kepentingan. Bank mengambil inisiatif untuk mengungkapkan tidak hanya masalah yang disyaratkan oleh peraturan perundang-undangan, tetapi juga hal yang penting untuk pengambilan keputusan oleh Pemegang Saham dan pemangku kepentingan lainnya. The Bank provides relevant material information that is easily accessible and understood by the stakeholders. The Bank takes the initiative to disclose not only issues required by laws and regulations, but also important matters for decision making by Shareholders and other stakeholders.
Keberlanjutan Sustainability	Bank mematuhi peraturan perundang-undangan serta berkomitmen melaksanakan tanggung jawab terhadap masyarakat dan lingkungan agar berkontribusi pada pembangunan berkelanjutan melalui kerja sama dengan semua pemangku kepentingan terkait untuk meningkatkan kehidupan mereka dengan cara yang selaras dengan kepentingan bisnis dan agenda pembangunan berkelanjutan. The Bank complies with the laws and regulations and is committed to carrying out its responsibilities towards community and environment in order to contribute to sustainable development by working with all relevant stakeholders to improve their lives aligned with the business interests and the sustainable development agenda.

Struktur GCG

GCG Structures

Struktur tata kelola Bank Victoria secara garis besar tergambar pada organ utama Bank yaitu Rapat Umum Pemegang Saham (RUPS), Dewan Komisaris, dan Direksi. Untuk membantu pelaksanaan tugasnya, sebagaimana disyaratkan oleh regulasi, Dewan Komisaris dan Direksi membentuk komite-komite. Selain itu, mengacu pada Anggaran Dasar Bank dan peraturan perundang-undangan yang berlaku, masing-masing organ mempunyai peran penting dalam penerapan GCG dan menjalankan fungsi, tugas, dan tanggung jawabnya untuk kepentingan Bank. Struktur tata kelola Bank Victoria disajikan dalam bagan berikut:

Bank Victoria’s governance structure is broadly illustrated in the Bank’s main organs, which are the General Meeting of Shareholders (GMS), the Board of Commissioners, and the Board of Directors. To assist in implementing their duties, as stipulated by the regulations, the Board of Commissioners and Board of Directors form committees. Also, as referred to in the Bank’s Articles of Association and applicable laws and regulations, each organ has an important role in implementing GCG and performing its functions, duties, and responsibilities for the Bank’s benefits. Bank Victoria’s governance structure is presented in the following chart:

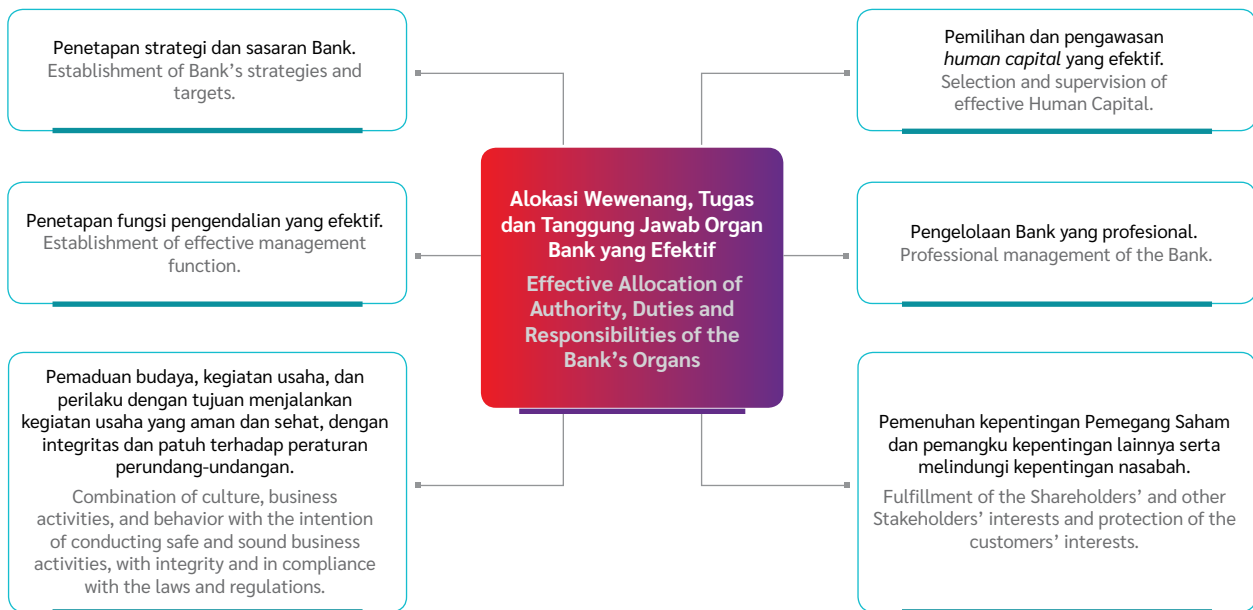


Framework GCG

GCG Framework

Untuk mendukung implementasi GCG yang efektif, Bank menyusun *Corporate Governance Framework* dengan merujuk pada peraturan perundang-undangan, serta mempertimbangkan kondisi, budaya, dan nilai-nilai Bank. Skema *Corporate Governance Framework* Bank Victoria dijelaskan sebagai berikut:

To support effective GCG implementation, the Bank has prepared a Corporate Governance Framework by referring to the applicable laws and regulations and observing the Bank's conditions, culture, and values. The Corporate Governance Framework of Bank Victoria is explained as follows:



Peningkatan Kualitas Implementasi GCG

Improvement of GCG Implementation Quality

Mekanisme pelaksanaan GCG di Bank Victoria didasarkan pada praktik-praktik terbaik dalam industri perbankan dengan tujuan agar implementasinya lebih terarah menuju *Good Corporate Sustainability*. Adapun mekanisme tata kelola yang diterapkan Bank Victoria sebagai berikut:

1. Menetapkan standar kualitas implementasi GCG;
2. Mengawasi implementasi GCG;
3. Menilai implementasi GCG; dan
4. Meningkatkan kualitas implementasi GCG dan *benchmarking*.

The mechanism for implementing Bank Victoria's GCG is based on the best practices in banking industry aiming to make its implementation more focused on Good Corporate Sustainability. The governance mechanism implemented by Bank Victoria is as follows:

1. Determining quality standard of GCG implementation;
2. Monitoring the GCG implementation;
3. Assessing the GCG implementation; and
4. Improving quality of GCG implementation and benchmarking.

Penilaian Penerapan GCG

Bank secara konsisten setiap tahun melakukan penilaian penerapan GCG secara mandiri (*self assessment*) untuk mengetahui tingkat kecukupan penerapan GCG di lingkungan Bank. *Self assessment* dilakukan Bank dengan mengacu pada regulasi yang berlaku, yaitu Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 dan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum, serta berbagai acuan standar praktik terbaik yang dilakukan perbankan (*best practices*). *Self assessment* GCG ini dimaksudkan untuk mengklasifikasikan kekuatan (*strength*) dan kelemahan (*weakness*) pelaksanaan tata kelola perusahaan yang ditinjau dari 3 (tiga) aspek, yaitu *governance structure*, *governance process*, dan *governance outcome*.

Self assessment penerapan GCG secara individu meliputi 11 (sebelas) faktor penilaian pelaksanaan tata kelola, meliputi:

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

Berdasarkan *self assessment* yang dilakukan Bank atas penerapan GCG, diperoleh skor penilaian sebagai berikut:

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. Secara umum, beberapa kelemahan yang ada kurang signifikan dari semester sebelumnya dan dapat diselesaikan dengan tindakan normal oleh manajemen Bank. The Bank has implemented GCG, which in general is good, as reflected in the implementation of the 11 (eleven) aspects outlined in the analysis. In general, some of the existing weaknesses were less significant compared from the previous semester and can be resolved with normal action by the management of the Bank.

Skor penilaian *self assessment* GCG tersebut, diperoleh berdasarkan 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:

Assessment of GCG Implementation

The Bank consistently conducts annual self-assessment on GCG implementation to determine the adequacy level of GCG implementation within the Bank. The Bank conducts the self-assessment by referring to the applicable regulations, including the Financial Services Authority Regulation No. 17 of 2023 and Financial Services Authority Circular No. 13/SEOJK.03/2017 on Governance Implementation for Commercial Banks, as well as various standard references for best practices conducted by banks. The GCG self-assessment is intended to classify both the strengths and weaknesses of corporate governance implementation from 3 (three) aspects, namely governance structure, governance process and governance outcome.

Individual self-assessment of the GCG implementation includes 11 (eleven) governance implementation assessment factors, namely:

1. Implementation of Board of Directors' duties and responsibilities;
2. Implementation of Board of Commissioners' duties and responsibilities;
3. Completeness and implementation of committee's duties;
4. Management of conflict of interest;
5. Implementation of compliance function;
6. Implementation of Internal Audit function;
7. Implementation of external audit function;
8. Implementation of risk management including internal control system;
9. Provision of funds to related party and large exposure;
10. Transparency of the Bank's financial and non-financial condition, GCG Implementation Report, and Internal Reporting; dan
11. The Bank's strategic plan.

Based on self-assessment conducted by the Bank on implementation of GCG, the following assessment score was obtained:

The GCG self-assessment score was obtained from the analysis of the suitability of Bank Victoria's individual GCG self-assessment with 3 (three) aspects, which are governance structure, governance process, and governance outcome for each of the criteria, and the follow-up is described as follows:

Kekuatan (*Strength*) Penerapan Tata Kelola Bank

The Strength of the Bank's Governance Implementation

<i>Governance Structure:</i>	<i>Governance Structure:</i>
<ol style="list-style-type: none"> 1. Bank telah memenuhi struktur GCG dan sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum. Hal tersebut dibuktikan dengan komposisi anggota Dewan Komisaris, Direksi, Komite-Komite Bank (Komite di bawah Dewan Komisaris dan Komite di bawah Direksi) serta Satuan Kerja pada Bank telah sesuai dengan regulasi yang berlaku. Organ tata kelola tersebut juga telah melaksanakan tugas serta tidak ada intervensi dari pemilik/Pemegang Saham Pengendali pada operasional Bank; 2. Direksi Bank telah menyusun, menetapkan serta mengevaluasi dan menginikikan struktur organisasi dengan kejelasan tugas dan tanggung jawab terkait penerapan manajemen risiko yang disesuaikan dengan tujuan dan kebijakan usaha, serta ukuran dan kompleksitas kegiatan usaha Bank yang selaras dengan Rencana Bisnis Bank; 3. Dewan Komisaris telah bertanggung jawab kepada Pemegang Saham dalam hal pengawasan serta memberi saran dan/atau arahan atas kebijakan Direksi terhadap operasional Bank secara umum yang mengacu kepada rencana bisnis yang telah ditetapkan, serta memastikan kepatuhan terhadap seluruh peraturan dan perundang-undangan yang berlaku; 4. Dewan Komisaris dalam menjalankan perannya terus memastikan Bank telah dikelola sesuai kepentingan pemangku kepentingan. Dewan Komisaris juga senantiasa menjaga objektivitas dan independensi dalam menjalankan tugas, sehingga tidak terlibat dalam pengambilan keputusan operasional Bank, kecuali hal-hal yang diatur dan ditetapkan dalam Anggaran Dasar Bank dan peraturan perundang-undangan; dan 5. Bank juga telah menerapkan prinsip 3 (tiga) lini pertahanan (<i>three line of defense</i>) untuk sistem pengendalian internal. Setiap lini pertahanan memiliki serangkaian tanggung jawab khusus untuk manajemen dan pengendalian risiko. 	<ol style="list-style-type: none"> 1. The Bank has met the GCG structure and in line with the provisions of Financial Services Authority Regulation No. 17 of 2023 on Implementation of Governance for Commercial Banks. This is shown by the composition of members of the Board of Commissioners, Board of Directors, Bank Committees (Committees under Board of Commissioners and Committees under Board of Directors) and Work Units at the Bank are in line with the applicable regulations. These governance organs have also done their duties without intervention from the owner/controlling shareholder in the Bank's operations; 2. The Board of Directors of the Bank has prepared, set, evaluated and updated the organizational structure with clear duties and responsibilities related to the implementation of risk management that is suited to the business objectives and policies, as well as the size and complexity of the Bank's business activities that is align with the Bank's Business Plan; 3. The Board of Commissioners is hold accountable to the Shareholders in supervising and providing advice and/or direction on Board of Directors' policies regarding the Bank's operations, which in general refer to the established business plan, and ensuring compliance with all of the applicable laws and regulations; 4. In carrying out its role, the Board of Commissioners constantly ensuring the Bank is managed in line with the stakeholders' interests. Also, the Board of Commissioners always maintains objectivity and independence in carrying out its duties, so they are not involved in making operational decisions at the Bank, unless for matters regulated and stipulated in the Bank's Articles of Association and statutory regulations; dan 5. The Bank has also implemented the 3 (three) lines of defense in its internal control system. Each line of defense has specific responsibilities set for the risk management and control.
<i>Governance Process:</i>	<i>Governance Process:</i>
<ol style="list-style-type: none"> 1. Direksi telah melaksanakan tugasnya sesuai kewenangannya berdasarkan Anggaran Dasar. Dalam pelaksanaan tugas dan tanggung jawabnya termasuk dalam upaya pencapaian Rencana Bisnis Bank, Direksi berpedoman pada peraturan perundang-undangan, Anggaran Dasar, <i>BOD Charter</i> maupun kebijakan GCG yang berlaku, sehingga Direksi memastikan bahwa prinsip kehati-hatian, ketentuan batas maksimum pemberian kredit, ketentuan pihak terkait, dan sebagainya dapat dipatuhi; 2. Dewan Komisaris telah melakukan pengawasan terhadap kinerja Direksi, baik melalui mekanisme rapat maupun berdasarkan masukan dari Komite, serta memberikan saran dan/atau arahan secara tertulis; 3. Direktur yang membawahi kepatuhan telah memastikan kepatuhan Bank terhadap ketentuan yang berlaku. Pelaksanaan fungsi Audit Internal Bank telah berjalan sesuai dan memenuhi pedoman internal sesuai dengan standar minimum yang telah ditetapkan dalam Standar Pelaksanaan Fungsi Audit Intern Bank. Selain itu, SKAI juga telah menjalankan fungsinya secara independen dan objektif; 4. Penunjukan <i>Compliance Champion</i> pada setiap divisi dan/atau cabang dengan tugas membantu unit kepatuhan dalam melakukan sosialisasi peraturan dan/atau SOP di divisi dan/atau di setiap cabang. Pada semester II tahun 2023, telah dilaksanakan sosialisasi peraturan dan/atau SOP yang bertujuan untuk meningkatkan terciptanya budaya kepatuhan pada seluruh kegiatan usaha pada setiap jenjang organisasi; dan 5. Penunjukan akuntan publik telah melalui mekanisme yang diatur dalam kebijakan dan audit dilakukan secara independen dan profesional. 	<ol style="list-style-type: none"> 1. The Board of Directors has conducted the duties in line with the authority set by the Articles of Association. In implementing the duties and responsibilities, including efforts to achieve the Bank's Business Plan, the Board of Directors is guided by the statutory regulations, Articles of Association, BOD Charter and applicable GCG policies, so the Board of Directors ensures that the prudence principle, provisions on maximum credit limit, and provisions of related parties, etc. can be adhered; 2. The Board of Commissioners has supervised the Board of Directors' performance, both through meeting mechanisms and based on Committee's inputs, and through written suggestions and/or directions; 3. The Director in charge of compliance has ensured the Bank's compliance with applicable regulations. The implementation of the Bank's Internal Audit function has been conducted in line with and meets the internal guidelines of the minimum standards set out in the Bank's Internal Audit Function Implementation Standards. In addition, SKAI has also conducted its functions independently and objectively; 4. The appointment of a Compliance Champion in each division and/or branch with the duty to assist the compliance unit in disseminating regulations and/or SOPs in each division and/or branch. In the second semester of 2023, dissemination of regulations and/or SOPs has been done with the objectives to encourage the creation of compliance culture in all business activities at every level of the organization; and 5. The public accountant's appointment has been done through mechanism set in the policy and the audit has been conducted independently and professionally.

Kekuatan (*Strength*) Penerapan Tata Kelola Bank The Strength of the Bank's Governance Implementation

<i>Governance Outcome:</i>	<i>Governance Outcome:</i>
<p>1. Hasil rapat menjadi salah satu acuan Direksi dalam melaksanakan tugas dan tanggung jawabnya, dengan tetap berpedoman pada GCG dan target pencapaian yang telah ditetapkan dalam Rencana Bisnis Bank. Masing-masing Komite juga senantiasa meningkatkan peran aktifnya dalam menindaklanjuti hal-hal yang dibahas dalam rapat Komite. Penerapan praktik GCG di Bank Victoria merupakan suatu upaya dalam melakukan perbaikan dan peningkatan kualitas pengelolaan Bank secara berkelanjutan;</p> <p>2. Pencapaian kinerja semester II tahun 2023 cukup baik, namun masih terdapat inkonsistensi pada proses penyediaan dana, sehingga terlihat pada masih terdapatnya sejumlah kredit kualitas rendah yang dapat berpotensi mengganggu kinerja rentabilitas dan permodalan Bank. Pencapaian dan kondisi yang terjadi telah dikomunikasikan dalam rapat-rapat serta berfokus pada penerapan strategi yang telah diambil Direksi dengan pengawasan dan arahan/saran dari Dewan Komisaris;</p> <p>3. Bank telah menyusun dan menyajikan laporan serta melaporkannya dengan tata cara, jenis, dan cakupan sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan tentang Transparansi Kondisi Keuangan;</p> <p>4. Bank memastikan bahwa prinsip <i>four eyes principles</i> dan/atau GCG diterapkan pada seluruh tahapan proses kerja guna memitigasi potensi terjadinya pelanggaran (secara berkesinambungan terus membangun budaya kepatuhan pada seluruh unit kerja);</p> <p>5. Pelaksanaan audit oleh akuntan publik dilakukan secara objektif, independen, serta sesuai dan telah memenuhi persyaratan ketentuan yang berlaku;</p> <p>6. Rencana Bisnis Bank tahun 2023 secara umum dapat direalisasikan dengan Baik. Hal tersebut dibuktikan dari pencapaian target keuangan, pertumbuhan aset dan bisnis, serta perolehan laba dapat dicapai relatif sesuai dengan target yang ditetapkan. Bank juga terus berupaya mempertahankan pertumbuhan yang sehat, meskipun harus menghadapi situasi ekonomi yang masih dalam ketidakpastian; dan</p> <p>7. Bank secara transparan telah menyampaikan informasi keuangan dan non-keuangan kepada publik dengan baik melalui situs web Bank. Penyampaian informasi keuangan dan non-keuangan juga dilakukan dengan tepat waktu, lengkap, dan akurat.</p>	<p>1. The meeting results become one of the Board of Directors' references in conducting their duties and responsibilities, while still guided by GCG and achievement targets set in the Bank's Business Plan. Each Committee also constantly increasing its active role to follow up on matters discussed at Committee meetings. The implementation of GCG practices at Bank Victoria is an effort to continuously improving and enhancing the quality of the Bank management;</p> <p>2. The performance achievement in second semester of 2023 is quite good, but inconsistencies still exist in the funds provision process, leading to existence of several low quality credits that may potentially harm the Bank's profitability and capital performance. Achievements and conditions that occurred have been communicated in meetings as well as focused on implementing the strategies already taken by the Board of Directors under the supervision and direction/suggestions from Board of Commissioners;</p> <p>3. The Bank has prepared and presented as well as reported following the procedure, type, and coverage as stipulated in the Financial Services Authority regulations on Transparency on Financial Conditions;</p> <p>4. The Bank ensures the four eyes principles and/or GCG are applied in all stages of the work process to mitigate the violation potential (constantly building a compliance culture in all work units);</p> <p>5. Implementation of audit by public accountant is conducted objectively, independently, and in line with and meets the requirements of the applicable regulations;</p> <p>6. In general, the Bank's Business Plan for 2023, can be realized well. This is evidenced by the achievement of financial targets, the growth of asset and business, and profit generation which were achieved relatively in line with the set targets. The Bank also keeps on striving to maintain healthy growth, although it has to face the lingering economic situation uncertainties; and</p> <p>7. The Bank has transparently submitted the financial and non-financial information to the public via the Bank's website. Submission of financial and non-financial information is also conducted in a timely, complete and accurate manner.</p>

Kelemahan (*Weakness*) Penerapan Tata Kelola Bank The Strength of the Bank's Governance Implementation

<i>Governance Structure:</i>	<i>Governance Structure:</i>
<p>Masih terdapat beberapa kelemahan sebagaimana hasil pemeriksaan oleh regulator, yaitu pada aspek perkreditan, operasional dan TI. Kelemahan pada aspek tersebut antara lain disebabkan oleh masih perlu ditingkatkannya pemahaman dan konsistensi SDM terkait dalam pelaksanaan tugas dan tanggung jawabnya berdasarkan Standar Operasional Prosedur (SOP) yang berlaku.</p>	<p>Several weaknesses still exists, as per the inspections results by regulators, namely in the credit, operational and IT aspects. The weaknesses in these aspects are due to, among others, the need to improve the understanding and consistency of human resources in conducting their duties and responsibilities based on the applicable Standard Operating Procedures (SOP).</p>
<i>Governance Process:</i>	<i>Governance Process:</i>
<p>Berdasarkan hasil pemeriksaan Otoritas Jasa Keuangan masih terdapat beberapa kelemahan dalam transaksi perkreditan, operasional dan TI, baik dari isi proses maupun monitoring. Untuk mengatasi kelemahan ini, Bank terus melakukan langkah perbaikan, seperti pembentukan Departemen <i>Credit Monitoring</i> yang bertugas khusus melakukan pemantauan <i>credit after disbursement</i> dan melakukan <i>collection</i>; pengisian kebijakan/SOP; serta intensifikasi pelatihan dalam rangka meningkatkan kompetensi seluruh karyawan.</p>	<p>Based on the results of inspection by the Financial Services Authority, several weaknesses are found in credit transactions, operations and IT, both in the process content and monitoring. In addressing the weaknesses, the Bank continuously making corrective measurements, such as establishing the Credit Monitoring Department with special duty to monitor the credit after disbursement and carry out collections; updating policy/SOP; as well as intensifying training to increase the competency of all employees</p>
<i>Governance Outcome:</i>	<i>Governance Outcome:</i>
<p>1. Masih terdapat sanksi denda dari regulator atas pelanggaran ketentuan yang disebabkan oleh <i>human error</i> dan/atau tidak konsistennya pelaksanaan transaksi sesuai SOP yang berlaku; dan</p> <p>2. Masih terdapat beberapa kebijakan dan/atau SOP yang harus diperbarui sehubungan dengan adanya perubahan regulasi yang menjadi acuan dan/atau masa <i>review</i> kebijakan dan/atau SOP telah jatuh tempo.</p>	<p>1. Fines still imposed by regulators for violations of provisions due to human error and/or inconsistent implementation of transaction in line with the applicable SOP; and</p> <p>2. Updates required on some policies and/or SOP, in relation with the changes in regulations that are used as references and/or expiration of the review period of the policies and/or SOP.</p>

Rekomendasi dan Tindak Lanjut Penilaian GCG

Berdasarkan hasil penilaian penerapan GCG tahun 2023, terdapat beberapa rekomendasi dari regulator yang perlu ditindaklanjuti, sebagaimana data berikut ini:

Rekomendasi Recommendation	Tindak Lanjut Follow-up
<p>Hasil pemeriksaan Otoritas Jasa Keuangan tahun 2022 wajib ditindaklanjuti terutama untuk temuan dengan <i>date</i> sesuai komitmen Bank kepada Otoritas Jasa Keuangan.</p> <p>Results of the 2022 Financial Services Authority audit must be followed up, particularly for findings with <i>date</i> in line with the Bank's commitment to the Financial Services Authority.</p>	<p>Hasil pemeriksaan Otoritas Jasa Keuangan tahun 2022 seluruhnya telah ditindaklanjuti sesuai target <i>date</i> 2023.</p> <p>Results of the 2022 Financial Services Authority audit have been followed up completely following the 2023 target <i>date</i>.</p>
<p>Penyampaian laporan wajib menerapkan prinsip lengkap, akurat, dan tepat waktu.</p> <p>Submission of report must apply the complete, accurate and on time principles.</p>	<p>Bank telah menerapkan prinsip lengkap, akurat, dan tepat waktu dalam pengiriman laporan, yaitu dengan menerapkan <i>four eyes' principles</i>.</p> <p>The Bank has applied the complete, accurate and on time principles in the submission of report, namely by applying the four eyes principle.</p>

Recommendation and Follow-Up on GCG Assessment

Based on the assessment results of GCG implementation in 2023, there are several recommendations that need to be followed up, as shown in the following data:

Rapat Umum Pemegang Saham General Meeting of Shareholders

Rapat Umum Pemegang Saham (RUPS) merupakan organ tertinggi Bank yang mempunyai hak dan kewenangan yang tidak dimiliki oleh Dewan Komisaris dan Direksi dalam batasan yang ditentukan oleh peraturan perundang-undangan dan Anggaran Dasar Bank. Selain itu, RUPS menjadi media komunikasi bagi Dewan Komisaris dan Direksi terkait penyampaian laporan pertanggungjawaban Dewan Komisaris dan Direksi kepada Pemegang Saham.

The General Meeting of Shareholders (GMS) is the highest organ of the Bank with rights and authority not given to the Board of Commissioners and Board of Directors within the limits determined by laws and regulations and the Bank's Articles of Association. In addition, the GMS becomes a communication medium for the Board of Commissioners and Board of Directors regarding the submission of accountability reports from the Board of Commissioners and Board of Directors to Shareholders.

Informasi mengenai Keputusan RUPS Tahun 2023

Pada tahun 2023, Bank menyelenggarakan 1 (satu) kali RUPS Tahunan dan tidak menyelenggarakan RUPS lainnya. Informasi pelaksanaan dan hasil keputusan RUPS tahun 2023 diuraikan sebagai berikut:

GMS Implementation in 2023

In 2023, the Bank held 1 (one) Annual GMS and did not hold any other GMS. Information on the implementation and resolutions of the 2023 GMS is described as follows:

RUPS Tahunan 26 Mei 2023

Annual GMS 26 May 2023

Hari/Tanggal Day/Date	Jumat, 26 Mei 2023 Friday, 26 May 2023
Waktu Time	09.45-10.55 WIB
Tempat Place	Graha BIP, Function Hall Lt. 11 Jl. Gatot Subroto Kav. 23 Jakarta Selatan 12930
Kehadiran Dewan Komisaris Attendance of Board of Commissioners	Komisaris Utama Independen / Independent President Commissioner : Zaenal Abidin, Ph.D Komisaris/Komisaris Independen / Commissioner/Independent Commissioner : Gunawan Tenggarahardja Komisaris/Komisaris Independen / Commissioner/Independent Commissioner : Sia Leng Ho
Kehadiran Direksi Attendance of Board of Directors	Direktur Utama / President Director : Achmad Friscantono Wakil Direktur Utama / Deputy President Director : Rusli Direktur / Director : Lembing Direktur / Director : Debora Wahjutirto Tanoyo Direktur Kepatuhan dan Manajemen Risiko / Director of Compliance and Risk Management : Tamunan
Pemegang Saham Shareholders	RUPS dihadiri oleh Pemegang Saham yang mewakili 13.885.829.407 saham atau 87,62% dari seluruh saham dengan hak suara yang sah yang telah dikeluarkan oleh Bank. The GMS was attended by Shareholders representing 13,885,829,407 shares or 87.62% of all shares with valid voting rights issued by the Bank.
Penunjukan Pihak Independen dalam RUPS Tahunan Appointment of Independent Party at the Annual GMS	Bank telah menunjuk pihak independen yaitu Notaris Fathiah Helmi, SH, Biro Administrasi Efek yaitu PT Adimitra Jasa Korpora, dan Kantor Akuntan Publik Purwantono, Sungkoro & Surja untuk melakukan proses penghitungan suara dan/atau melakukan validasi. The Bank has appointed independent parties, namely Notary Fathiah Helmi, SH, Share Registrar Bureau PT Adimitra Jasa Korpora, and Public Accounting Firm Purwantono, Sungkoro & Surja to count and/or validate votes.

Hasil Keputusan RUPS Tahunan 26 Mei 2023

Resolutions of Annual GMS 26 May 2023

Keputusan Resolutions	Realisasi Realization	Pengambilan Suara Voting
Menyetujui Laporan Tahunan Perseroan termasuk Laporan Direksi, pengesahan Laporan Keuangan Tahunan, serta Laporan Tugas Pengawasan Dewan Komisaris pada tanggal 31 Desember 2022. Approved the Company's Annual Report including the Board of Directors' Report, validation of the Annual Financial Statements, as well as the Board of Commissioners' Supervisory Report on 31 December 2022.	Telah direalisasikan sepenuhnya. Fully realized.	Musyawahar mufakat. Amicable resolution.
Menyetujui penetapan penggunaan laba bersih Bank untuk tahun buku yang berakhir pada tanggal 31 Desember 2022. Approved the determination of the use of the Bank's net income for the fiscal year ending 31 December 2022.	Telah direalisasikan sepenuhnya. Fully realized.	Musyawahar mufakat. Amicable resolution.
Menyetujui pemberian kuasa dan wewenang kepada wakil Pemegang Saham untuk menetapkan besarnya honorarium anggota Dewan Komisaris serta memberi kuasa dan wewenang kepada Dewan Komisaris untuk menetapkan pembagian tugas dan wewenang anggota Direksi serta besarnya gaji dan tunjangan para anggota Direksi. Approved to grant power and authority to representatives of Shareholders to determine the honorarium amount for members of the Board of Commissioners and to grant power and authority to the Board of Commissioners to determine the division of duties and authorities of members of the Board of Directors and the amount of salary and allowances for members of the Board of Directors.	Telah direalisasikan sepenuhnya. Fully realized.	Musyawahar mufakat. Amicable resolution.
Menyetujui menunjuk akuntan publik untuk mengaudit Laporan Keuangan Bank untuk tahun buku 2023 dan memberikan kuasa kepada Dewan Komisaris untuk menetapkan honorarium akuntan publik tersebut serta persyaratan lain penunjukannya. Approved to appoint an Ndepe accountant to audit the Bank's Financial Statements for the 2023 fiscal year and granted authorities to the Board of Commissioners to determine the honorarium for Ndepe accountant and other requirements for the appointment.	Telah direalisasikan sepenuhnya. Fully realized.	Musyawahar mufakat. Amicable resolution.

Keputusan Resolutions	Realisasi Realization	Pengambilan Suara Voting
Menyetujui perubahan Pasal 17 ayat (9) huruf b dan Pasal 23 ayat (5) Anggaran Dasar Perseroan. Approved the amendments to Article 17 paragraph (9) letter b and Article 23 paragraph (5) of the Company's Articles of Association.	Telah direalisasikan sepenuhnya. Fully realized.	Musyawarah mufakat. Amicable resolution.
Menyetujui Laporan Realisasi Penggunaan Dana Penambahan Modal dengan Memberikan Hak Memesan Efek Terlebih Dahulu VI, Penambahan Modal dengan Memberikan Hak Memesan Efek Terlebih Dahulu VII, dan Penawaran Umum Berkelanjutan Obligasi III tahap I Tahun 2023. Approved the Report on the Realization of the Use of Proceeds from Capital Increase with Pre-emptive Rights VI, Capital Increase with Pre-emptive Rights VII, and Continuous Public Offering of Bonds III phase I Year 2023.	Telah direalisasikan sepenuhnya. Fully realized.	Musyawarah mufakat. Amicable resolution.
Menyetujui perubahan susunan pengurus Perseroan. Approved changes to the composition of the Company's management.	Telah direalisasikan sepenuhnya. Fully realized.	Musyawarah mufakat. Amicable resolution.

Informasi dan Realisasi mengenai Keputusan RUPS Tahunan 2022

Sepanjang tahun 2022, Bank Victoria telah menyelenggarakan 1 (satu) kali RUPS Tahunan yang diselenggarakan pada tanggal 3 Juni 2022 dan 2 (dua) kali RUPS Luar Biasa pada tanggal 10 Agustus 2022 dan 19 Oktober 2022 di Graha BIP, Function Hall Lt. 11, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930.

Keputusan rapat dilakukan dengan cara musyawarah untuk mufakat, apabila musyawarah untuk mufakat tidak tercapai, maka dilakukan pemungutan suara. Bank Victoria menunjuk pihak independen untuk RUPS Tahunan dan RUPS Luar Biasa yaitu Biro Administrasi Efek dan Notaris dalam melakukan perhitungan suara.

Hingga akhir Desember 2023, seluruh keputusan RUPS di tahun 2022 telah selesai direalisasikan dengan agenda RUPS diuraikan sebagai berikut:

RUPS Tahunan 3 Juni 2022

1. Persetujuan Laporan Tahunan Perseroan dan pengesahan Laporan Keuangan Perseroan untuk tahun buku yang berakhir pada tanggal 31 Desember 2021, Laporan Tugas Pengawasan Dewan Komisaris serta memberikan pelunasan dan pembebasan tanggung jawab sepenuhnya (*acquit et de charge*) kepada anggota Direksi dan Dewan Komisaris Perseroan.
2. Penetapan besarnya honorarium anggota Dewan Komisaris dan penetapan pembagian tugas dan wewenang anggota Direksi serta besarnya gaji dan tunjangan para anggota Direksi Perseroan.
3. Penunjukan akuntan publik independen terdaftar yang akan melakukan audit atas Laporan Keuangan Perseroan untuk tahun buku yang berakhir pada 31 Desember 2022.
4. Persetujuan pengangkatan dan pengunduran diri Direksi dan Dewan Komisaris Perseroan.
5. Persetujuan peningkatan modal dasar Perseroan.
6. Persetujuan atas Penambahan Modal Perseroan dengan memberikan Hak Memesan Efek Terlebih Dahulu (PMHMETD) dan perubahan Anggaran Dasar Perseroan.

Information and Realization of the 2022 Annual GMS Resolutions

Throughout 2022, Bank Victoria held 1 (one) Annual GMS on 3 June 2022 and 2 (two) Extraordinary GMS on 10 August 2022 and 19 October 2022 at Graha BIP, Function Hall, 11th floor, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930.

Meeting's resolutions are held by way of deliberation to reach consensus, in the event deliberation to reach the consensus is not reached, then voting is conducted. Bank Victoria appoints independent parties for the Annual GMS and Extraordinary GMS, namely the Share Registrar Bureau and Notary to calculate the votes.

Until the end of December 2023, all resolutions of the 2022 GMS had been completed with the GMS agenda outlined as follows:

Annual GMS 3 June 2022

1. Approval of the Company's Annual Report and ratification of the Company's Financial Statements for the fiscal year ended 31 December 2021, the Board of Commissioners' Supervisory Report, and granting full release and discharge of responsibility (*acquit et de charge*) to members of the Board of Directors and Board of Commissioners of the Company.
2. Determination of honorarium amount for members of the Board of Commissioners and determination of the division of duties and authorities of members of the Board of Directors and the amount of salary and allowances for members of the Board of Directors of the Company.
3. Appointment of registered independent public accountant to audit the Company's Financial Statements for the fiscal year ended 31 December 2022.
4. Approval of appointment and resignation of the Board of Directors and Board of Commissioners of the Company.
5. Approval of increasing the authorized capital of the Company.
6. Approval of the Company's Capital Increase by granting Pre-emptive Rights (PMHMETD) and amendments to the Company's Articles of Association.

RUPS Luar Biasa 10 Agustus 2022

1. Perubahan Pasal 3 Anggaran Dasar Perseroan.
2. Persetujuan rencana tindak pengembangan bisnis Bank melalui peningkatan modal inti, kolaborasi dengan *partner* strategis atau aksi korporasi lainnya.
3. Penambahan susunan pengurus Perseroan.

RUPS Luar Biasa 19 Oktober 2022

1. Persetujuan atas rencana pelaksanaan Penambahan Modal Perseroan dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) sebagaimana dimaksud dalam Peraturan Otoritas Jasa Keuangan No. 32/2015, bersamaan dengan penerbitan waran, berikut dengan pemberian kuasa dan wewenang kepada Direksi Perseroan untuk menetapkan jumlah saham yang ditawarkan dalam PMHMETD, menetapkan harga pelaksanaan PMHMETD, melakukan segala tindakan yang diperlukan dalam pelaksanaan PMHMETD dengan memperhatikan peraturan perundang-undangan yang berlaku, dan melakukan peningkatan modal ditempatkan dan modal disetor setelah pelaksanaan PMHMETD.
2. Persetujuan penetapan Direksi dan Dewan Komisaris Perseroan.

Extraordinary GMS 10 August 2022

1. Amendment to Article 3 of the Company's Articles of Association.
2. Approval of the Bank's business development action plan through increasing core capital, collaboration with strategic partners or other corporate actions.
3. Addition to the composition of the Company's management.

Extraordinary GMS 19 October 2022

1. Approval of the plan to implement the Company's Capital Increase with Pre-emptive Rights (PMHMETD) as referred to in the Financial Services Authority Regulation No. 32/2015, together with the issuance of warrants, along with the granting of power and authority to the Board of Directors of the Company to determine the number of shares offered in the PMHMETD, to determine the exercise price for PMHMETD, to take all necessary actions in executing PMHMETD by observing the applicable laws and regulations, and to increase the issued and paid-up capital after executing PMHMETD.
2. Approval of the appointment of the Board of Directors and Board of Commissioners of the Company.

Dewan Komisaris Board of Commissioners

Dewan Komisaris merupakan organ Bank yang bertugas dan bertanggung jawab untuk melakukan pengawasan dan memberikan nasihat kepada Direksi serta memastikan bahwa Bank melaksanakan GCG pada seluruh tingkatan atau jenjang organisasi.

The Board of Commissioners is the Bank's organ that is in charge of and responsible for supervising and providing advices to the Board of Directors and ensuring that the Bank implements GCG at all levels of the organization.

Pedoman Dewan Komisaris

Dewan Komisaris Bank telah memiliki pedoman kerja yang tertuang dalam *Board of Commissioners Charter (BOC Charter)*. Pedoman tersebut telah dimutakhirkan berdasarkan Keputusan Dewan Komisaris No. 001/SK-KOM/12/23 tanggal 6 Desember 2023.

Board of Commissioners Charter

The Bank's Board of Commissioners has a work guideline set out in the Board of Commissioners Charter (BOC Charter). The guideline has been updated based on the Board of Commissioners' Decision No. 001/SK-KOM/12/23 dated 6 December 2023.

Ruang Lingkup Pekerjaan dan Tanggung Jawab Masing-Masing Anggota Dewan Komisaris

Berdasarkan Keputusan Dewan Komisaris No. 003/SK-KOM/11/22 tanggal 9 November 2022 tentang Pembagian Tugas dan Wewenang Anggota *Board of Commissioners*, tugas dan tanggung jawab masing-masing anggota Dewan Komisaris diuraikan sebagai berikut:

Scope of Work and Responsibilities of Each Member of the Board of Commissioners

Based on the Board of Commissioners' Decision No. 003/SK-KOM/11/22 dated 9 November 2022 regarding the Distribution of Duties and Authorities of the Board of Commissioners' Members, the duties and responsibilities of each member of the Board of Commissioners are described as follows:

Zaenal Abidin, Ph.D
Komisaris Utama Independen
Independent President Commissioner

<ol style="list-style-type: none"> 1. Melakukan koordinasi dan memberikan pengarahan kepada anggota Dewan Komisaris; 2. Mengkoordinasikan pengawasan yang dilakukan oleh anggota Dewan Komisaris sesuai dengan bidangnya masing-masing; 3. Menyelenggarakan dan memimpin: <ol style="list-style-type: none"> a. Rapat internal Dewan Komisaris; dan b. Rapat gabungan Dewan Komisaris dan Direksi guna membahas dan mengevaluasi perkembangan laporan kinerja Direksi; 4. Melakukan pengawasan kegiatan pada bidang-bidang: <ol style="list-style-type: none"> a. <i>Good Corporate Governance</i>; b. <i>Compliance & System Procedure</i>; c. <i>Risk Management/Integrated</i>; d. <i>Tata Kelola Terintegrasi/Integrated Corporate Governance</i>; dan e. <i>SKAL/Integrated & Anti Fraud</i>; 5. Melakukan pengawasan kegiatan bidang Internal Audit; 6. Memberikan tugas lain kepada anggota Dewan Komisaris; 7. Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya; 8. Mengambil alih tugas Komisaris lainnya apabila yang bersangkutan berhalangan; serta 9. Memimpin rapat gabungan antara Direksi dan Dewan Komisaris. 	<ol style="list-style-type: none"> 1. Coordinating and providing direction to the Board of Commissioners' members; 2. Coordinating the supervision carried out by the Board of Commissioners' members according to their respective fields; 3. Organizing and leading: <ol style="list-style-type: none"> a. Board of Commissioners internal meeting; and b. Joint meetings of the Board of Commissioners and Board of Directors to discuss and evaluate the progress of the Board of Directors' performance reports; 4. Supervising activities in the following areas: <ol style="list-style-type: none"> a. Good Corporate Governance; b. Compliance & System Procedure; c. Risk Management/Integrated; d. Integrated Corporate Governance; and e. SKAL/Integrated & Anti Fraud; 5. Supervising activities in Internal Audit areas; 6. Giving other duties to the Board of Commissioners' members; 7. Creating a draft of memorandum to the Board of Directors relating to the field supervision and development; 8. Taking over the duties of other Commissioners in the event the person concerned is absent; and 9. Leading joint meetings between the Board of Directors and Board of Commissioners.
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Gunawan Tengarahardja
Komisaris/Komisaris Independen
Commissioner/Independent Commissioner

<ol style="list-style-type: none"> 1. Melakukan pengawasan kegiatan bidang-bidang: <ol style="list-style-type: none"> a. Perkreditan; b. <i>Information Technology</i>; c. <i>Human Capital Management & General Affair</i>; d. <i>Corporate Legal</i>; dan e. <i>Credit Legal</i>; 2. Membahas permasalahan-permasalahan bidang yang berada di bawah pengawasannya; 3. Membantu mempersiapkan penyusunan laporan bagi Otoritas Jasa Keuangan pada setiap akhir semester, khususnya mengenai bidang-bidang yang berada di bawah pengawasannya; 4. Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya; serta 5. Mewakili tugas Komisaris Utama dan Komisaris lainnya, apabila yang bersangkutan berhalangan. 	<ol style="list-style-type: none"> 1. Supervising activities in the following areas: <ol style="list-style-type: none"> a. Credit; b. Information Technology; c. Human Capital Management & General Affair; d. Corporate Legal; and e. Credit Legal; 2. Discussing issues in the areas under their supervision; 3. Assisting the preparation of reports for the Financial Services Authority at the end of each semester, particularly regarding the fields under their supervision; 4. Creating a draft of memorandum to the Board of Directors relating to the field supervision and development; and 5. Representing the duties of the President Commissioner and other Commissioners, in the event the person concerned cannot
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Sia Leng Ho
Komisaris
Commissioner

<ol style="list-style-type: none"> 1. Melakukan pengawasan kegiatan bidang-bidang: <ol style="list-style-type: none"> a. <i>Retail Banking, Branch Banking Network & Performance</i>; b. <i>Finance & Accounting</i>; c. <i>Operations</i>; d. <i>Loan Operations</i>; dan e. <i>Treasury & International Banking</i>; 2. Membahas permasalahan-permasalahan bidang yang berada di bawah pengawasannya; 3. Membantu mempersiapkan penyusunan laporan bagi Otoritas Jasa Keuangan pada setiap akhir semester, khususnya mengenai bidang-bidang yang berada di bawah pengawasannya; 4. Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya; serta 5. Mewakili tugas Komisaris Utama dan Komisaris lainnya, apabila yang bersangkutan berhalangan. 	<ol style="list-style-type: none"> 1. Supervising activities in the following areas: <ol style="list-style-type: none"> a. Retail Banking, Branch Banking Network & Performance; b. Finance & Accounting; c. Operations; d. Loan Operations; and e. Treasury & International Banking; 2. Discussing issues in the areas under their supervision; 3. Assisting the preparation of reports for the Financial Services Authority at the end of each semester, particularly regarding the fields under their supervision; 4. Creating a draft of memorandum to the Board of Directors relating to the field supervision and development; and 5. Representing the duties of the President Commissioner and other Commissioners, in the event the person concerned cannot attend the meeting.
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Wewenang Dewan Komisaris

Dalam menjalankan tugas dan tanggung jawab, Dewan Komisaris memiliki wewenang untuk:

1. Dewan Komisaris dengan suara terbanyak setiap waktu berhak memberhentikan untuk sementara waktu seorang atau lebih anggota Direksi, jika bertindak bertentangan dengan Anggaran Dasar serta peraturan lainnya atau melalaikan kewajibannya atau terdapat alasan yang mendesak bagi Bank, termasuk dalam hal Direksi sakit dan tidak dapat menjalankan tugas. Dalam jangka waktu paling lambat 30 hari setelah tanggal pemberhentian sementara harus diselenggarakan RUPS;
2. Dalam hal jabatan salah seorang anggota Direksi kosong, baik mengundurkan diri maupun diberhentikan dan penggantinya belum ada atau belum memangku jabatannya, maka Dewan Komisaris berwenang menunjuk salah seorang anggota Direksi untuk menjalankan pekerjaan anggota Direksi lainnya yang kosong tersebut dengan kekuasaan dan wewenang yang sama dan Direktur tersebut dapat bertindak untuk dan atas nama Direksi serta menunjuk pihak lain untuk mewakili Bank dalam hal terjadi benturan kepentingan Bank dengan kepentingan semua anggota Direksi;
3. Menetapkan komposisi Direksi berdasarkan kewenangan yang dilimpahkan oleh RUPS;
4. Mendapatkan informasi dari Direksi Entitas Anak terkait dengan kondisi Entitas Anak; dan
5. Menyetujui atau menolak secara tertulis tindakan-tindakan yang dilakukan Direksi seperti yang tercantum dalam *BOC Charter*.

Jumlah, Komposisi, dan Independensi Dewan Komisaris

Jumlah dan Komposisi

Anggota Dewan Komisaris Bank minimal berjumlah 3 (tiga) orang, termasuk Komisaris Independen. Masa jabatan Dewan Komisaris adalah 3 (tiga) tahun sejak diangkat dalam RUPS dengan tidak mengurangi hak RUPS untuk memberhentikan Dewan Komisaris sewaktu-waktu dengan memperhatikan ketentuan Anggaran Dasar. Pada tahun 2023, jumlah dan komposisi Dewan Komisaris Bank Victoria sebagai berikut:

Nama Name	Jabatan Position	Dasar Hukum Pengangkatan dan Masa Jabatan Legal Basis of Appointment and Term of Office
Zaenal Abidin, Ph.D	Komisaris Utama Independen Independent President Commissioner	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).
Sia Leng Ho	Komisaris Commissioner	Keputusan RUPS Luar Biasa tanggal 10 Agustus 2022 (2022-2025). Extraordinary GMS Resolutions dated 10 August 2022 (2022-2025).

Authority of the Board of Commissioners

In performing its duties and responsibilities, the Board of Commissioners has the authority to:

1. The Board of Commissioners with the most vote, at all times, has the rights to suspend one or more members of the Board of Directors, if acting on the contrary to the Articles of Association and other regulations or neglecting the obligations or there is an urgent reason for the Bank, including in the case of the Board of Directors being sick and unable to perform the duties. Within the period of no more than 30 days after the suspension date, a GMS must be held;
2. In the event that one position of Board of Directors is vacant, either due to resignation or dismissal, and no successor available or has assumed the position, the Board of Commissioners is authorized to appoint a member of the Board of Directors to carry out the work of the other vacant position of the Board of Directors with equal power and authority, and this Director may act for and on behalf of the Board of Directors and appoint other party to represent the Bank in the event of a conflict of interest of the Bank with the interest of all members of the Board of Directors;
3. Determining the composition of the Board of Directors based on the authority delegated by the GMS;
4. Obtaining information from the Board of Directors of a Subsidiary related to the Subsidiary condition; and
5. Approving or rejecting in writing the actions of the Board of Directors as stated in the BOC Charter.

Number, Composition, and Independence of the Board of Commissioners

Number and Composition

The Board of Commissioners of the Bank shall at least consists of 3 (three) members, including Independent Commissioner. The 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. In 2023, the number and composition of Bank Victoria's Board of Commissioners were as follows:

Independensi

Bank menjamin independensi seluruh anggota Dewan Komisaris dalam menjalankan tugas dan tanggung jawabnya. Dewan Komisaris juga senantiasa bersikap profesional untuk memberikan kontribusi bagi kemajuan Bank.

Penilaian Kemampuan dan Kepatutan Dewan Komisaris

Sebagaimana disyaratkan dalam Peraturan Otoritas Jasa Keuangan No. 27/POJK.03/2016 tentang Penilaian Kemampuan dan Kepatutan bagi Pihak Utama Lembaga Jasa Keuangan, calon anggota Dewan Komisaris wajib memperoleh persetujuan dari Otoritas Jasa Keuangan sebelum menjalankan tugasnya. Pada tahun 2023, seluruh anggota Dewan Komisaris Bank telah memenuhi seluruh persyaratan dan telah lulus uji penilaian kemampuan dan kepatutan bagi pihak utama, sebagaimana dibuktikan dengan keputusan Otoritas Jasa Keuangan dan Bank Indonesia yang disebutkan pada masing-masing profil anggota Dewan Komisaris pada bab Profil Perusahaan.

Komisaris Independen

Bank Victoria memiliki 2 (dua) Komisaris Independen atau 66,67% dari total 3 (tiga) anggota Dewan Komisaris. Dengan demikian, Bank telah memenuhi ketentuan dalam Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, yang mewajibkan Bank untuk memiliki Komisaris Independen minimal 50% dari total anggota Dewan Komisaris. Berikut persyaratan Komisaris Independen Bank:

1. 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;
2. Tidak mempunyai saham baik langsung maupun tidak langsung pada Bank;
3. Tidak mempunyai hubungan afiliasi dengan Bank, anggota Dewan Komisaris, anggota Direksi atau Pemegang Saham Utama Bank; dan
4. Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank tersebut.

Pernyataan Independensi

Seluruh Komisaris Independen Bank telah menandatangani Surat Pernyataan Independensi dan lulus *fit and proper test* sebagai Komisaris Independen sesuai dengan ketentuan Otoritas Jasa Keuangan tentang *fit and proper test*.

Independence

The Bank guarantees the independence of all members of Board of Commissioners in performing their duties and responsibilities. The Board of Commissioners also always behaves professionally to contribute to the progress of the Bank.

Fit and Proper Test for the Board of Commissioners

As required in Financial Services Authority Regulation No. 27/POJK.03/2016 on Fit and Proper Test for Key Parties of Financial Services Institutions, candidates for the Board of Commissioners are required to obtain approval from the Financial Services Authority before performing their duties. In 2023, all members of the Bank's Board of Commissioners fulfilled all requirements and passed the fit and proper test for the key parties, as proven by the decisions of the Financial Services Authority and Bank Indonesia mentioned in each member of the Board of Commissioners' profile in the Company Profile chapter.

Independent Commissioner

Bank Victoria has 2 (two) Independent Commissioners or 66.67% of the total 3 (three) members of the Board of Commissioners. Thus, the Bank has complied with the provisions of Financial Services Authority Regulation No. 17 of 2023 on the Implementation of Governance for Commercial Bank, which requires Bank to have Independent Commissioners of at least 50% of the total members of the Board of Commissioners. Below are the requirements to be the Bank's Independent Commissioner:

1. 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;
2. Not possessing any shares in the Bank, either directly or indirectly;
3. Not having affiliation relationship with the Bank, members of Board of Commissioners, members of Board of Directors, or the Bank's Main Shareholders; and
4. Not having business relationship, either directly or indirectly, that are related to the Bank's business activities.

Statement of Independency

All of the Bank's Independent Commissioners have signed a Statement of Independence and passed the fit and proper test as Independent Commissioners in accordance with the provisions of the Financial Services Authority regarding fit and proper test.

Rapat Dewan Komisaris

Kebijakan Rapat Dewan Komisaris

Dewan Komisaris minimal melaksanakan 1 (satu) kali rapat internal selama 2 (dua) bulan dan minimal 1 (satu) kali dalam 4 (empat) bulan rapat gabungan dengan Direksi. 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*.

Frekuensi Kehadiran Rapat Dewan Komisaris

Selama tahun 2023, frekuensi kehadiran Dewan Komisaris dalam rapat ditunjukkan sebagai berikut:

Nama Name	Jabatan Position	Rapat Internal Dewan Komisaris Board of Commissioners Internal Meeting			Rapat Gabungan dengan Direksi Joint Meeting with Board of Directors		
		Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Zaenal Abidin, Ph.D	Komisaris Utama Independen Independent President Commissioner	8	8	100.00	13	13	100.00
Gunawan Tenggarahardja	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	8	8	100.00	13	13	100.00
Sia Leng Ho	Komisaris Commissioner	8	8	100.00	13	13	100.00

Kehadiran Dewan Komisaris dalam RUPS dapat dilihat pada bagian Rapat Umum Pemegang Saham.

Agenda Rapat Internal Dewan Komisaris

Agenda yang dibahas dalam rapat internal Dewan Komisaris khususnya terkait rekomendasi kebijakan Pedoman Gratifikasi/Bonus tahun 2022-2023 bagi pengurus dan karyawan Bank, rekomendasi Direktur Operasional dan IT, rencana perubahan Anggaran Dasar, rekomendasi tunjangan akhir tahun bagi pengurus dan karyawan, persetujuan penunjukan anggota Dewan Komisaris yang mewakili Dewan Komisaris dalam melakukan tindakan/perbuatan hukum tertentu, profil risiko, penerbitan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, rencana kerja Dewan Komisaris tahun 2024, Rencana Bisnis Bank 2024-2026, dan perubahan *BOC Charter* dalam rangka penyesuaian dengan Peraturan Otoritas Jasa Keuangan yang baru.

Board of Commissioners' Meetings

Board of Commissioners' Meeting Policy

The Board of Commissioners holds at least 1 (one) internal meeting in 2 (two) months and at least 1 (one) joint meeting every 4 (four) months with the Board of Directors. Meeting must be attended by all members of the Board of Commissioners in person at least 2 (two) times in 1 (one) year, and if members of the Board of Commissioners cannot attend the Board of Commissioners' meeting in person, such members can attend the meeting via teleconference technology.

Board of Commissioners' Frequency of Attendance in Meetings

Throughout 2023, the Board of Commissioners' frequency of attendance at meetings is shown as follows:

The attendance of the Board of Commissioners at GMS can be seen in the General Meeting of Shareholders section.

Agenda of Board of Commissioners' Internal Meeting

The agenda discussed in the internal meeting of Board of Commissioners is specifically related to recommendations for 2022-2023 Gratification/Bonus Guidelines policy for Bank's management and employees, recommendations for Director of Operations and IT, plans for changes to Articles of Association, recommendations for year-end allowances for management and employees, approval of the appointment of members of the Board Commissioner representing the Board of Commissioners in carrying out certain legal actions/actions, risk profiles, issuance of Financial Services Authority Regulation No. 17 of 2023 on Implementation of Governance for Commercial Banks, the Board of Commissioners 2024 work plan, Bank Business Plan 2024-2026, and changes to BOC Charter to adjust to the new Financial Services Authority Regulations.

Agenda Rapat Gabungan dengan Direksi

Agenda yang dibahas dalam rapat gabungan dengan Direksi khususnya terkait target internal Bank Victoria tahun 2023, kinerja Bank dibandingkan target internal dan Rencana Bisnis Bank, tindak lanjut memo Dewan Komisaris, teknologi informasi, kinerja keuangan dibandingkan target internal dan Rencana Bisnis Bank, revisi Rencana Bisnis Bank 2023-2025, Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme (APU dan PPT), *SuperApps Digital on Boarding*, dan Rencana Bisnis Bank 2024-2026.

Persetujuan dan Rekomendasi Dewan Komisaris

Ketentuan terkait keputusan yang perlu mendapat persetujuan Dewan Komisaris sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 dan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023, yaitu:

1. Dewan Komisaris dilarang untuk ikut serta dalam pengambilan keputusan untuk kegiatan operasional Bank, kecuali:
 - a. Penyediaan dana kepada pihak terkait sebagaimana diatur dalam ketentuan mengenai batas maksimum pemberian kredit bank umum; dan
 - b. Hal-hal lain yang ditetapkan dalam Anggaran Dasar Bank atau peraturan perundang-undangan yang berlaku;
2. Pengambilan keputusan kegiatan operasional Bank oleh Dewan Komisaris sebagaimana dimaksud di atas merupakan bagian dari tugas pengawasan oleh Dewan Komisaris sehingga tidak meniadakan tanggung jawab Direksi atas pelaksanaan kepengurusan Bank.

Sementara itu, Dewan Komisaris telah mengeluarkan 29 persetujuan dan rekomendasi di sepanjang tahun 2023, seperti arahan hasil penelaahan tren pertumbuhan kinerja usaha dan pencapaian target Rencana Bisnis Bank triwulan IV 2022, serta rekomendasi mengenai evaluasi tunjangan operasional, dan lain sebagainya.

Sertifikasi Manajemen Risiko Dewan Komisaris

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 24 Tahun 2022 tentang Pengembangan Kualitas Sumber Daya Manusia Bank Umum, salah satu syarat umum dan standardisasi kompetensi serta keahlian manajemen Bank adalah dengan dimilikinya sertifikasi manajemen risiko. Terkait hal tersebut, Dewan Komisaris Bank Victoria telah mengikuti sertifikasi manajemen risiko yang dapat dilihat pada masing-masing profil anggota Dewan Komisaris pada bab Profil Perusahaan.

Agenda of Joint Meeting with Board of Directors

The agenda discussed in the joint meeting with the Board of Directors is specifically related to Bank Victoria's internal targets for 2023, Bank's performance compared to the internal targets and Bank's Business Plan, follow-up to the Board of Commissioners' memo, information technology, financial performance compared to the internal targets and Bank's Business Plan, revision of Bank's Business Plan 2023-2025, Anti-Money Laundering and Counter Terrorism Financing (AML and CTF), *SuperApps Digital on Boarding*, and Bank Business Plan 2024-2026.

Board of Commissioners' Approvals and Recommendations

Provisions related to decisions that need approval of the Board of Commissioners as stipulated in the Financial Services Authority Regulation No. 55/POJK.03/2016 and Financial Services Authority Regulation No. 17 of 2023 are:

1. The Board of Commissioners is prohibited from taking part in decision making for the Bank's operational activities, unless:
 - a. Provision of fund to related party as stipulated in the provisions regarding legal lending limit for commercial bank; and
 - b. Other matters specified in the Bank's Articles of Association or in the applicable laws and regulations;
2. Decision making on Bank operational activities by the Board of Commissioners as referred to in the above is part of the supervisory function of the Board of Commissioners and does not negate the Board of Directors' responsibility for the implementation of Bank management.

Meanwhile, the Board of Commissioners issued 29 approvals and recommendations throughout 2023, including directions on the review results of business performance growth trends and targets achievement of Bank's Business Plan Quarter IV-2022, as well as recommendation on the evaluation of operational allowances, and so on.

Board of Commissioners' Risk Management Certification

Based on Financial Services Authority Regulation No. 24 of 2022 on Human Resources Quality Development for Commercial Banks, one of the general requirements and standardization of competence and expertise of Bank management is to have risk management certification. As such, Bank Victoria's Board of Commissioners has attended the risk management certification which can be seen in profile of each Board of Commissioners' member in the Company Profile chapter.

Direksi

Board of Directors

Direksi merupakan organ yang bertanggung jawab atas jalannya pengurusan Bank untuk kepentingan Bank serta sesuai dengan maksud dan tujuan yang telah ditetapkan oleh Bank.

The Board of Directors is the organ that is responsible for managing the Bank for the Bank's interests and in accordance with the aims and objectives determined by the Bank.

Pedoman Direksi

Direksi Bank telah memiliki pedoman kerja yang tertuang dalam *Board of Directors Charter (BOD Charter)*. Pedoman tersebut telah dimutakhirkan berdasarkan Keputusan Direksi No. 006A/SK-DIR/12/23 tanggal 6 Mei 2023.

Board of Directors Charter

The Bank's Board of Directors has a work guideline set out in the Board of Directors Charter (BOD Charter). The guidelines are updated based on Board of Directors' Decision No. 006A/SK-DIR/12/23 dated 6 May 2023.

Ruang Lingkup Pekerjaan dan Tanggung Jawab Masing-Masing Anggota Direksi

Berdasarkan Keputusan No. 001/SK-KOM/02/22 tanggal 23 Februari 2022 tentang Pembagian Tugas dan Wewenang Anggota *Board of Directors*, tugas dan tanggung jawab masing-masing Direksi sebagai berikut:

Scope of Work and Responsibility of Each Member of the Board of Directors

Based on the Decision No. 001/SK-KOM/02/22 dated 23 February 2022 on the Distribution of Duties and Authorities of the Board of Directors' Members, the duties and responsibilities of each Board of Directors are as follows:

Achmad Friscantono Direktur Utama President Director	
Koordinasi pengelolaan Bank Victoria yang membawahi Divisi: 1. <i>SEVP of Change Management Office</i> ; 2. <i>SKAI & Anti Fraud</i> ; 3. <i>Corporate Legal</i> ; 4. <i>Treasury</i> ; dan 5. <i>Information Technology</i> .	Coordination of Bank Victoria management which oversees the Divisions of: 1. <i>SEVP of Change Management Office</i> ; 2. <i>SKAI & Anti Fraud</i> ; 3. <i>Corporate Legal</i> ; 4. <i>Treasury</i> ; and 5. <i>Information Technology</i> .
Rusli Wakil Direktur Utama Deputy President Director	
Wakil Direktur Utama yang membawahi Divisi: 1. <i>SEVP of Operations & International Banking</i> ; 2. <i>Operations & Internal Control Division</i> ; 3. <i>International Banking Division</i> ; 4. <i>Special Asset Management Division</i> ; 5. <i>Credit Risk Review Division</i> ; 6. <i>Human Capital Management & General Affair Division</i> ; dan 7. <i>Credit Monitoring & Collection</i> .	Deputy President Director in charge of Divisions of: 1. <i>SEVP of Operations & International Banking</i> ; 2. <i>Operations & Internal Control Division</i> ; 3. <i>International Banking Division</i> ; 4. <i>Special Asset Management Division</i> ; 5. <i>Credit Risk Review Division</i> ; 6. <i>Human Capital Management & General Affair Division</i> ; and 7. <i>Credit Monitoring & Collection</i> .
Lembing Direktur Bisnis Director of Business	
Direktur Bisnis yang membawahi Divisi: 1. <i>SEVP of Business</i> ; 2. <i>Commercial Banking</i> ; dan 3. <i>SME & Consumer Banking Division</i> .	Director of Business in charge of Divisions of: 1. <i>SEVP of Business</i> ; 2. <i>Commercial Banking</i> ; and 3. <i>SME & Consumer Banking Division</i> .

Debora Wahjutirto Tanoyo
Direktur Keuangan
Director of Finance

Direktur Keuangan dan *Loan Admin* yang membawahi Divisi:
1. *SEVP of Finance, Accounting & Management Information System*;
2. *Accounting Division*;
3. *Management Information System (MIS)*;
4. *Loan & Trade Operation Division*;
5. *Credit Legal Division*; dan
6. *Branch Banking Network & Digital; Sales Division*.

Director of Finance and *Loan Admin* in charge of Divisions of:
1. *SEVP of Finance, Accounting & Management Information System*;
2. *Accounting Division*;
3. *Management Information System (MIS)*;
4. *Loan & Trade Operation Division*;
5. *Credit Legal Division*; and
6. *Branch Banking Network & Digital; Sales Division*.

Tamunan
Direktur Kepatuhan dan Manajemen Risiko
Director of Compliance and Risk Management

Direktur Kepatuhan dan Manajemen Risiko yang membawahi Divisi/Unit/Departemen:
1. *Compliance & System Procedure Division*;
2. *Risk Management/Integrated Division*;
3. *Corporate Secretary Division*; dan
4. *Anti Money Laundering, Counter Terrorist Financing & Weapon Mass Destruction (AML, CTF & WMD)*.

Director of Compliance and Risk Management in charge of Divisions/Unit/Department:
1. *Compliance & System Procedure Division*;
2. *Risk Management/Integrated Division*;
3. *Corporate Secretary Division*; and
4. *Anti Money Laundering, Counter Terrorist Financing & Weapon Mass Destruction (AML, CTF & WMD)*.

Wewenang Direksi

Dalam menjalankan tugas dan tanggung jawab, Direksi memiliki wewenang untuk:

1. Mewakili Bank di dalam dan di luar pengadilan tentang segala hal dan dalam segala kejadian, mengikat Bank dengan pihak lain dan pihak lain dengan Bank, serta menjalankan segala tindakan, baik yang mengenai kepengurusan maupun kepemilikan, dengan pembatasan yang ditetapkan dalam Anggaran Dasar dan dengan memperhatikan peraturan perundang-undangan yang berlaku;
2. Untuk melakukan tindakan tertentu, Direksi terlebih dahulu harus mendapat persetujuan tertulis dari Dewan Komisaris kecuali ditentukan lain oleh peraturan dan ketentuan yang berlaku; dan
3. Memperoleh, mengalihkan atau melepaskan dengan cara apapun hak-hak atas barang-barang tidak bergerak dan Bank.

Jumlah, Komposisi, dan Independensi Direksi

Jumlah dan Komposisi

Anggota Direksi Bank minimal berjumlah 3 (tiga) orang, yang terdiri dari seorang Direktur Utama dan 2 (dua) orang Direktur. Masa jabatan Direksi adalah 3 (tiga) tahun sejak diangkat dalam RUPS dengan tidak mengurangi hak RUPS untuk memberhentikan Direksi sewaktu-waktu dengan memperhatikan ketentuan Anggaran Dasar. Pada tahun 2023, jumlah dan komposisi Direksi Bank Victoria sebagai berikut:

Authority of the Board of Directors

In performing its duties and responsibilities, the Board of Directors has the authority to:

1. Represent the Bank in and out of court on all matters and in any events, to bind the Bank to other parties and other parties to the Bank, and to carry out all actions, both on the management and ownership, with the limitations as stipulated in the Articles of Association with due regard to the applicable laws and regulations;
2. To perform certain actions, the Board of Directors must first obtain written approval from the Board of Commissioners, unless stipulated otherwise by the applicable rules and regulations; and
3. To obtain, transfer, or waive by any means the rights to immovable property and the Bank.

Number, Composition, and Independence of the Board of Directors'

Number and Composition

The Board of Directors of the Bank shall at least consists of 3 (three) members, consisting of President Director and 2 (two) Directors. The term of office of the Board of Directors is 3 (three) years effective from the appointment in the GMS, without prejudice to the GMS' right to dismiss the Board of Directors at any given time with due observance of the Articles of Association. In 2023, the number and composition of Bank Victoria's Board of Directors were as follows:

Nama Name	Jabatan Position	Dasar Hukum Pengangkatan dan Masa Jabatan Legal Basis of Appointment and Term of Office
Achmad Friscantono	Direktur Utama President Director	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).
Rusli	Wakil Direktur Utama Deputy President Director	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).
Lembing	Direktur Director	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).
Debora Wahjutirto Tanoyo	Direktur Director	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025). Annual GMS Resolution dated 3 June 2022 (2022-2025).

Independensi

Bank menjamin independensi seluruh anggota Direksi dalam menjalankan tugas dan tanggung jawabnya. Direksi juga senantiasa bersikap profesional untuk memberikan kontribusi bagi kemajuan Bank.

Independence

The Bank guarantees the independence of all members of Board of Directors in performing their duties and responsibilities. The Board of Directors also always behaves professionally to contribute to the progress of the Bank.

Penilaian Kemampuan dan Kepatutan Direksi

Sebagaimana disyaratkan dalam Peraturan Otoritas Jasa Keuangan No. 27/POJK.03/2016 tentang Penilaian Kemampuan dan Kepatutan bagi Pihak Utama Lembaga Jasa Keuangan, calon anggota Direksi wajib memperoleh persetujuan dari Otoritas Jasa Keuangan sebelum menjalankan tugasnya. Pada tahun 2023, seluruh anggota Direksi Bank telah memenuhi seluruh persyaratan dan telah lulus uji penilaian kemampuan dan kepatutan bagi pihak utama, sebagaimana dibuktikan dengan keputusan Otoritas Jasa Keuangan dan Bank Indonesia yang disebutkan pada masing-masing profil anggota Direksi pada bab Profil Perusahaan.

Fit and Proper Test for the Board of Directors

As required in Financial Services Authority Regulation No. 27/POJK.03/2016 on Fit and Proper Test for Key Parties of Financial Services Institutions, candidates for the Board of Directors are required to obtain approval from the Financial Services Authority before performing their duties. In 2023, all members of the Bank's Board of Directors fulfilled all requirements and passed the fit and proper test for the key parties, as proven by the decisions of the Financial Services Authority and Bank Indonesia, mentioned in each member of the Board of Directors' profile in the Company Profile chapter.

Rapat Direksi

Kebijakan Rapat Direksi

Direksi minimal melaksanakan 1 (satu) kali rapat internal dalam 1 (satu) bulan dan minimal 1 (satu) kali dalam 4 (empat) bulan rapat gabungan dengan Dewan Komisaris. Rapat Direksi dapat diselenggarakan apabila dihadiri secara fisik ataupun secara *telekonferensi* oleh ½ bagian atau lebih dari jumlah anggota Direksi.

Board of Directors' Meetings

Board of Directors' Meeting Policy

The Board of Directors holds at least 1 (one) internal meeting in 1 (one) month and at least 1 (one) joint meeting every 4 (four) months with the Board of Commissioners. The Board of Directors' meetings can be held if attended in person or via teleconference by ½ or more members of the Board of Directors.

Frekuensi Kehadiran Rapat Direksi

Selama tahun 2023, frekuensi kehadiran Direksi dalam rapat ditunjukkan sebagai berikut:

Nama Name	Jabatan Position	Rapat Internal Direksi Board of Directors Internal Meeting			Rapat Gabungan dengan Dewan Komisaris Joint Meeting with Board of Commissioners		
		Total Rapat Total Meetings	Total Kehadiran Total Meetings	Tingkat Kehadiran Attendance Rate (%)	Total Rapat Total Meetings	Total Kehadiran Total Meetings	Tingkat Kehadiran Attendance Rate (%)
Achmad Friscantono	Direktur Utama President Director	52	51	98.08	13	13	100.00
Rusli	Wakil Direktur Utama Deputy President Director	52	48	92.31	13	13	100.00
Lembing	Direktur Director	52	45	86.54	13	12	92.31
Debora Wahjutirto Tanoyo	Direktur Director	52	49	94.23	13	13	100.00
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	52	48	92.31	13	13	100.00

Kehadiran Direksi dalam RUPS dapat dilihat pada bagian Rapat Umum Pemegang Saham.

Agenda Rapat Internal Direksi

Agenda yang dibahas dalam rapat internal Direksi khususnya terkait kinerja kredit, proyeksi *Non Performing Loan* (NPL), kinerja keuangan, paparan Direktorat, Aset yang Diambil Alih (AYDA) dan *write off*, makroekonomi dan keinginan faktor rentabilitas dan faktor permodalan, revisi Rencana Bisnis Bank 2023-2025, dan proyeksi kinerja kredit.

Agenda Rapat Gabungan dengan Dewan Komisaris

Agenda yang dibahas dalam rapat gabungan dengan Dewan Komisaris dapat dilihat pada bagian Rapat Dewan Komisaris.

Persetujuan dan Rekomendasi Direksi

Pada tahun 2023, Direksi telah mengeluarkan 149 persetujuan dan rekomendasi sebagai upaya perbaikan kinerja, seperti Kebijakan Hierarki Peraturan, Kebijakan Kepatuhan, SOP Kepatuhan, SOP *Access Control and Security* (ACS), Komite Pengadaan PT Bank Victoria International Tbk, dan lain sebagainya.

Board of Directors' Frequency of Attendance in Meetings

Throughout 2023, the Board of Directors' frequency of attendance at meetings is shown as follows:

The attendance of the Board of Directors at GMS can be seen in the General Meeting of Shareholders section.

Agenda of Board of Directors' Internal Meeting

The agenda discussed in the internal meeting of Board of Directors is specifically related to credit performance, Non-Performing Loan (NPL) projections, financial performance, Directorate presentation, Foreclosed Assets (AYDA) and *write off*, macroeconomics and updates of profitability factor and capital factor, revision of Bank Business Plan 2023-2025, and credit performance projections.

Agenda of Joint Meeting with Board of Commissioners

The agenda discussed in the joint meeting with the Board of Commissioners can be seen in the Board of Commissioners' Meetings section.

Board of Directors' Approvals and Recommendations

In 2023, the Board of Directors issued 149 approvals and recommendations to improve its performance, such as Regulatory Hierarchy Policy, Compliance Policy, Compliance SOP, Access Control and Security (ACS) SOP, the Procurement Committee of PT Bank Victoria International Tbk, and so on.

Sertifikasi Manajemen Risiko Direksi

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 24 Tahun 2022 tentang Pengembangan Kualitas Sumber Daya Manusia Bank Umum, salah satu syarat umum dan standarisasi kompetensi serta keahlian manajemen Bank adalah dengan dimilikinya sertifikasi manajemen risiko. Terkait hal tersebut, Direksi Bank Victoria telah mengikuti sertifikasi manajemen risiko yang dapat dilihat pada masing-masing profil anggota Direksi pada bab Profil Perusahaan.

Board of Directors' Risk Management Certification

Based on Bank Indonesia Regulation No. 24 of 2022 concerning Development of the Quality of Human Resources for Commercial Banks, one of the general requirements and standardization of competence and expertise of Bank management is to have risk management certification. As such, Bank Victoria's Board of Directors has attended the risk management certification which can be seen in profile of each Board of Directors' member in the Company Profile chapter.

Rangkap Jabatan Dewan Komisaris dan Direksi Concurrent Positions of the Board of Commissioners and Board of Directors

Sesuai Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Dewan Komisaris dan Direksi Bank dilarang merangkap jabatan yang diuraikan sebagai berikut:

1. Dewan Komisaris merangkap jabatan sebagai anggota Dewan Komisaris, anggota Direksi, anggota Dewan Pengawas Syariah, atau Pejabat Eksekutif pada lembaga keuangan atau perusahaan keuangan baik bank maupun bukan bank;
2. Dewan Komisaris dilarang merangkap jabatan sebagai anggota Dewan Komisaris, anggota Direksi, anggota Dewan Pengawas Syariah, atau Pejabat Eksekutif pada lebih dari 1 (satu) lembaga atau perusahaan bukan keuangan, baik yang berkedudukan di dalam maupun di luar negeri;
3. Direksi merangkap jabatan sebagai anggota Dewan Komisaris, anggota Direksi, anggota Dewan Pengawas Syariah, atau Pejabat Eksekutif pada bank, perusahaan, dan/atau lembaga lain;
4. Dewan Komisaris dan Direksi merangkap jabatan pada bidang tugas fungsional pada lembaga keuangan bank dan/atau lembaga keuangan bukan bank yang berkedudukan di dalam maupun di luar negeri;
5. Dewan Komisaris dan Direksi merangkap jabatan pada jabatan lain yang dapat menimbulkan benturan kepentingan dalam pelaksanaan tugas sebagai anggota Dewan Komisaris atau Direksi;
6. Dewan Komisaris dan Direksi merangkap jabatan pada jabatan lain sesuai dengan ketentuan peraturan perundang-undangan; dan
7. Komisaris Independen dilarang merangkap jabatan sebagai pejabat publik.

Informasi rangkap jabatan yang dimiliki anggota Dewan Komisaris dan Direksi Bank dapat dilihat pada bagian Profil Dewan Komisaris dan Direksi.

Pursuant to Financial Services Authority Regulation No. 17 of 2023 on Implementation of Governance for Commercial Banks, the Board of Commissioners and Board of Directors of Banks are prohibited from holding concurrent position as described as follows:

1. The Board of Commissioners holds concurrent position as members of Board of Commissioners, members of Board of Directors, members of Sharia Supervisory Board, or Executive Officers in financial institutions or financial companies, either banks and non-banks;
2. The Board of Commissioners is prohibited from holding concurrent position as members of Board of Commissioners, members of Board of Directors, members of Sharia Supervisory Board, or Executive Officers in more than 1 (one) non-financial institution or company, either domiciled within or outside the country;
3. The Board of Directors holds concurrent position as members of Board of Commissioners, members of Board of Directors, members of Sharia Supervisory Board, or Executive Officers at other banks, companies, and/or other institutions;
4. The Board of Commissioners and Board of Directors hold concurrent position in the field of functional duties at bank financial institutions and/or non-bank financial institutions domiciled within or outside the country;
5. The Board of Commissioners and Board of Directors hold concurrent position in other positions that can cause conflicts of interest in performing their duties as members of Board of Commissioners or Board of Directors;
6. The Board of Commissioners and Board of Directors hold concurrent position in other positions in accordance with the provisions of the laws and regulations; and
7. Independent Commissioners are prohibited from holding concurrent position as public officials.

Information on concurrent positions held by members of Board of Commissioners and Board of Directors at the Bank can be seen in the Profile section of the Board of Commissioners and Board of Directors.

Penilaian Kinerja Dewan Komisaris, Direksi, Komite Pendukung Dewan Komisaris, serta Komite dan Organ Pendukung Direksi

Performance Assessment of the Board of Commissioners, Board of Directors, Board of Commissioners' Supporting Committees, and Board of Directors' Committees and Supporting Organs

Penilaian Kinerja Dewan Komisaris

Prosedur Pelaksanaan Penilaian Kinerja Dewan Komisaris

Penilaian terhadap kinerja Dewan Komisaris dilakukan secara rutin setiap tahun dibantu oleh Komite Nominasi dan Remunerasi melalui sistem penilaian sendiri dan *peer evaluation*. Pelaksanaan penilaian sendiri Dewan Komisaris mengacu pada Peraturan Otoritas Jasa Keuangan tentang Penerapan Tata Kelola bagi Bank Umum. Sedangkan, penilaian *peer evaluation* dilakukan oleh setiap anggota Dewan Komisaris terhadap anggota Dewan Komisaris lainnya berdasarkan bidang pengawasan dan pekerjaan masing-masing Dewan Komisaris. Selanjutnya, hasil penilaian Dewan Komisaris disampaikan melalui Komite Nominasi dan Remunerasi kepada Pemegang Saham sebelum pelaksanaan RUPS Tahunan.

Board of Commissioners' Performance Assessment

Procedures for the Board of Commissioners' Performance Assessment

The Board of Commissioners' performance is assessed regularly every year, assisted by the Nomination and Remuneration Committee through self-assessment system and peer evaluation. The Board of Commissioners' self-assessment refers to the Financial Services Authority regulation on Implementation of Governance for Commercial Banks. Whereas, peer evaluation is conducted by each member of the Board of Commissioners against other members of the Board of Commissioners based on the respective supervision areas and work of the Board of Commissioners. The Board of Commissioners' assessment results are then submitted through the Nomination and Remuneration Committee to Shareholders prior to the implementation of the Annual GMS.

Pihak yang Melakukan Penilaian Kinerja Dewan Komisaris Party Assessing the Board of Commissioners' Performance



Penilaian Sendiri Self-Assessment

Penilaian sendiri Dewan Komisaris dikoordinir oleh Divisi *Compliance & System Procedure* dan dilaporkan kepada Dewan Komisaris melalui Komite Nominasi dan Remunerasi.

The Board of Commissioners' self-assessment is coordinated by the Compliance & System Procedure Division and reported to the Board of Commissioners through the Nomination and Remuneration Committee.



Peer Evaluation

Pelaksanaan penilaian *peer evaluation* dilakukan oleh setiap anggota Dewan Komisaris terhadap anggota Dewan Komisaris lainnya.

The peer evaluation assessment is conducted by each member of the Board of Commissioners against other members of the Board of Commissioners.

Kriteria Penilaian Kinerja Dewan Komisaris

Kriteria penilaian terhadap kinerja Dewan Komisaris ditetapkan untuk menilai kinerja Dewan Komisaris baik secara kolektif maupun secara individu. Adapun kriteria penilaian mencakup hal-hal berikut:

Criteria for Assessing the Board of Commissioners' Performance

The criteria for assessing the Board of Commissioners' performance are established to assess the Board of Commissioners' performance collegially and individually. The assessment criteria include the following matters:

Penilaian Sendiri Self-Assessment

Kriteria terkait penilaian sendiri Dewan Komisaris mencakup 16 (enam belas) indikator *governance structure*, 17 (tujuh belas) 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.

Criteria related to the Board of Commissioners' self-assessment include 16 (sixteen) *governance structure* indicators, 17 (seventeen) *governance process* indicators, and 6 (six) *governance outcome* indicators as stipulated in Attachment III to the Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks.

Peer Evaluation

1. Kehadiran dalam rapat internal Dewan Komisaris, rapat gabungan Dewan Komisaris bersama Direksi, rapat Dewan Komisaris dengan Pemegang Saham, dan rapat Dewan Komisaris atau Komite dengan Unit Kerja Bank;
2. Integritas (misalnya benturan kepentingan yang muncul);
3. Pengetahuan dan pemahaman atas nilai-nilai misi, rencana jangka panjang Bank, dan refleksi pemahaman ini kepada isu-isu penting sepanjang tahun;
4. Kemampuan untuk menyampaikan, memberikan argumentasi, dan memberikan solusi mengenai isu-isu strategis Bank;
5. Kemampuan 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; serta
6. 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.

1. Attendance at internal meetings of the Board of Commissioners, joint meetings of the Board of Commissioners and the Board of Directors, meetings between the Board of Commissioners and Shareholders, and meetings between the Board of Commissioners or Committee with the Bank's Work Units;
2. Integrity (for example conflicts of interest that arise);
3. Knowledge and understanding of the values of the mission, the Bank's long-term plan, and the reflection of this understanding on important issues throughout the year;
4. Ability to convey, provide arguments and solutions regarding the Bank's strategic issues;
5. Ability to follow issues and trends that affect the Bank and use this information to assess and direct the Bank's performance, not only from year to year, but also in the long-term; and
6. The relationship between member of the Board of Commissioners and fellow members of the Board of Commissioners, and the Board of Directors and other parties as regulated in the Articles of Association and laws and regulations.

Hasil Penilaian Kinerja Dewan Komisaris

Hasil evaluasi terhadap kinerja Dewan Komisaris secara keseluruhan dan kinerja masing-masing anggota Dewan Komisaris secara individu merupakan bagian tak terpisahkan dalam skema kompensasi/pemberian insentif bagi Dewan Komisaris dan dasar pertimbangan bagi Pemegang Saham untuk memberhentikan dan/atau menunjuk kembali Dewan Komisaris yang bersangkutan. Informasi terkait hasil penilaian kinerja Dewan Komisaris pada tahun 2023 diuraikan sebagai berikut:

The Board of Commissioners' Performance Assessment Results

The Board of Commissioners' performance assessment results collegially and individually are an integral part of the compensation/incentive scheme for the Board of Commissioners and the basis for consideration for Shareholders to dismiss and/or reappoint the relevant member of the Board of Commissioners. Information on the Board of Commissioners' performance assessment results for 2023 is described as follows:



Penilaian Sendiri Self-Assessment

Pada tahun 2023, hasil penilaian sendiri Dewan Komisaris memperoleh nilai komposit "1 (satu)" dengan kategori "Sangat Baik".

In 2023, the Board of Commissioners' self-assessment results obtained a composite score of "1 (one)" under the category of "Very Good".



Peer Evaluation

Pada tahun 2023, hasil penilaian *peer evaluation* pelaksanaan tugas Dewan Komisaris memperoleh nilai komposit "1 (satu)" dengan kategori "Sangat Baik".

In 2023, the peer evaluation results of the implementation of Board of Commissioners' duties obtained a composite score of "1 (one)" under the category of "Very Good".

Penilaian Kinerja Direksi

Prosedur Pelaksanaan Penilaian Kinerja Direksi

Sebagai bentuk pengukuran atas pencapaian target kinerja yang telah dilaksanakan oleh Direksi, maka perlu dilakukan penilaian terhadap Direksi secara kolektif maupun masing-masing anggota Direksi paling sedikit 1 (satu) kali dalam 1 (satu) tahun. Penilaian Direksi dilakukan melalui 2 (dua) metode, yaitu penilaian sendiri dan penilaian oleh Dewan Komisaris. Penilaian sendiri dilakukan mengacu pada Peraturan Otoritas Jasa Keuangan tentang Penerapan Tata Kelola bagi Bank Umum, di mana Bank wajib melaksanakan penilaian sendiri implementasi GCG dengan salah satu faktor penilaian adalah pelaksanaan tugas dan tanggung jawab Direksi. Sedangkan, penilaian kinerja Direksi oleh Dewan Komisaris sebagai berikut:

1. Direksi menyusun *Key Performance Indicator* (KPI) yang memuat rencana kerja, sasaran atau target yang akan dicapai dalam 1 (satu) tahun maupun triwulan;
2. Penilaian kinerja Direksi dilaksanakan oleh Dewan Komisaris, namun Direktur Utama dapat menilai Direksi lainnya;
3. 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
4. Hasil evaluasi KPI Direksi oleh Dewan Komisaris menjadi bahan penilaian pertanggungjawaban Direksi dalam pelaksanaan RUPS.

Board of Directors' Performance Assessment

Procedures for the Board of Directors' Performance Assessment

As a form of measuring the achievement of performance targets carried out by the Board of Directors, it is necessary to assess the Board of Directors collectively and individually at least 1 (one) time in 1 (one) year. The Board of Directors is assessed through 2 (two) methods, which are self-assessment and assessment by the Board of Commissioners. The self-assessment is carried out in reference to the Financial Services Authority Regulation on the Implementation of Governance for Commercial Banks, in which the Bank is required to conduct a self-assessment of GCG implementation with one of the assessment factors being the implementation of the Board of Directors' duties and responsibilities. Whereas, the Board of Directors' performance assessment conducted by the Board of Commissioners is as follows:

1. The Board of Directors prepares Key Performance Indicator (KPI) that includes work plan, objectives, or goals to be achieved within 1 (one) year and quarterly;
2. The Board of Directors' performance is assessed by the Board of Commissioners, but the President Director can assess other Directors;
3. 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
4. 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.

Pihak yang Melakukan Penilaian Kinerja Direksi Party Assessing the Board of Directors' Performance



Penilaian Sendiri Self-Assessment

Penilaian sendiri Direksi dikoordinir oleh Divisi *Compliance & System Procedure* dan dilaporkan kepada Dewan Komisaris dan Direksi. The Board of Directors' self-assessment is coordinated by the Compliance & System Procedure Division and reported to the Board of Commissioners and Board of Directors.



Penilaian oleh Dewan Komisaris Assessment by the Board of Commissioners

Penilaian dilakukan oleh Dewan Komisaris. The assessment is conducted by the Board of Commissioners.

Kriteria Penilaian Kinerja Direksi

Kriteria penilaian terhadap kinerja Direksi ditetapkan untuk menilai kinerja Direksi baik secara kolegial maupun secara individu. Adapun kriteria penilaian mencakup hal-hal berikut:

Criteria for Assessing the Board of Directors' Performance

The criteria for assessing the Board of Directors' performance are established to assess the Board of Directors' performance collegially and individually. The assessment criteria include the following matters:

Penilaian Sendiri Self-Assessment

Kriteria terkait penilaian sendiri Direksi mencakup 16 (enam belas) indikator *governance structure*, 14 (empat belas) 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.

Criteria related to the Board of Directors' self-assessment include 16 (sixteen) governance structure indicators, 14 (fourteen) governance process indicators, and 10 (ten) governance outcome indicators as stipulated in Attachment III to the Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks.

Penilaian oleh Dewan Komisaris Assessment by the Board of Commissioners

1. Terlaksananya kepemimpinan (*leadership*), kerja sama (*team work*), serta komunikasi dan kompetensi yang baik;
2. Terlaksananya GCG dalam setiap kegiatan usaha Bank;
3. Terlaksananya pencapaian Rencana Bisnis Bank; dan
4. Terlaksananya pengawasan atas tindak lanjut dari Direksi berdasarkan audit, rekomendasi SKAI, auditor eksternal, atau pengawasan Otoritas Jasa Keuangan.

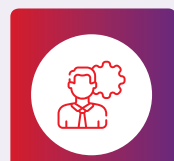
1. The implementation of good leadership, teamwork, communication and competency;
2. The implementation of GCG in each of the Bank's business activities;
3. The achievement of the Bank's Business Plan; and
4. The implementation of monitoring and follow-up from the Board of Directors based on audit, recommendation of SKAI, external auditor, or the Financial Services Authority's supervision.

Hasil Penilaian Kinerja Direksi

Hasil evaluasi terhadap kinerja Direksi merupakan bagian tak terpisahkan dalam skema kompensasi/pemberian insentif bagi Direksi dan dasar pertimbangan bagi Pemegang Saham untuk memberhentikan dan/atau menunjuk kembali Direksi yang bersangkutan. Informasi terkait hasil penilaian kinerja Direksi pada tahun 2023 diuraikan sebagai berikut:

The Board of Directors' Performance Assessment Results

The Board of Directors' performance assessment results are an integral part of the compensation/incentive scheme for the Board of Directors and the basis for consideration for Shareholders to dismiss and/or reappoint the relevant member of the Board of Directors. Information on the Board of Directors' performance assessment results for 2023 is described as follows:



Penilaian Sendiri Self-Assessment

Pada tahun 2023, hasil penilaian sendiri Direksi memperoleh nilai komposit "2 (dua)" dengan kategori "Baik".
In 2023, the Board of Directors' self-assessment results obtained a composite score of "2 (two)" under the category of "Good".



Penilaian oleh Dewan Komisaris Assessment by the Board of Commissioners

Pada tahun 2023, hasil penilaian kinerja Direksi oleh Dewan Komisaris memperoleh nilai komposit "2 (dua)" dengan kategori "Baik".
In 2023, the Board of Directors' performance assessment results by the Board of Commissioners obtained a composite score of "2 (two)" under the category of "Good".

Penilaian Kinerja Komite Pendukung Dewan Komisaris

Prosedur Pelaksanaan Penilaian Kinerja Komite Pendukung Dewan Komisaris

Dewan Komisaris senantiasa melakukan pengawasan dan evaluasi secara berkala atas kinerja Komite-Komite di bawah Dewan Komisaris yang meliputi Komite Audit, Komite Pemantau Risiko, serta Komite Nominasi dan Remunerasi. Penilaian tersebut dilakukan secara individual maupun secara kolektif setiap 1 (satu) tahun dengan menggunakan metode penilaian sendiri komite pendukung Dewan Komisaris dan penilaian kinerja oleh Dewan Komisaris.

Performance Assessment of the Board of Commissioners' Supporting Committees

Procedures for Performance Assessment of the Board of Commissioners' Supporting Committees

The Board of Commissioners conducts regular monitoring and evaluation of the performance of Committees under the Board of Commissioners, which include the Audit Committee, Risk Monitoring Committee, and Nomination and Remuneration Committee. The assessment is carried out individually or collectively every 1 (one) year by using the self-assessment method for the Board of Commissioners' supporting committees and performance assessment by the Board of Commissioners.

Pihak yang Melakukan Penilaian Kinerja Komite Pendukung Dewan Komisaris
Party Assessing the Performance of the Board of Commissioners' Supporting Committees



Penilaian Sendiri
Self-Assessment

Penilaian dikoordinir oleh Divisi *Compliance & System Procedure* dan dilaporkan kepada Dewan Komisaris.
The assessment is coordinated by the Compliance & System Procedure Division and reported to the Board of Commissioners.



Penilaian oleh Dewan Komisaris
Assessment by the Board of Commissioners

Penilaian dilakukan oleh Dewan Komisaris.
The assessment is conducted by the Board of Commissioners.

Kriteria Penilaian Kinerja Komite Pendukung Dewan Komisaris
Criteria for Assessing the Performance of the Board of Commissioners' Supporting Committees

Penilaian Sendiri Self-Assessment	
Penilaian sendiri Komite di bawah Dewan Komisaris dalam implementasi GCG mencakup 10 (sepuluh) indikator <i>governance structure</i> , 7 (tujuh) indikator <i>governance process</i> , dan 2 (dua) indikator <i>governance outcome</i> sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola Bagi Bank Umum.	The self-assessment of Committees under the Board of Commissioners in GCG implementation includes 10 (ten) governance structure indicators, 7 (seven) governance process indicators, and 2 (two) governance outcome indicators as stipulated in Appendix III of the Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks.
Penilaian oleh Dewan Komisaris Assessment by the Board of Commissioners	
Kriteria penilaian dibuat secara umum dan diuraikan dengan penjelasan secara kualitatif (penilaian tidak dalam angka/skala) yang mencakup: 1. Kehadiran dalam rapat Komite; 2. Penguasaan materi yang akan dibahas; 3. Kesiapan menyediakan waktu dan upaya dalam memenuhi tugas dan tanggung jawab sebagai anggota Komite; 4. Kesiapan berpartisipasi dalam kegiatan di luar kantor, seperti kunjungan ke unit bisnis; 5. Kualitas dan saran yang diberikan dalam rapat-rapat; 6. Terlaksananya pemantauan dan evaluasi, baik secara berkala maupun tahunan, atas hal-hal yang menjadi bidang tugas dan tanggung jawab masing-masing komite; 7. Pemantauan dan koreksi penyimpangan; serta 8. Terlaksananya pemantauan dan evaluasi terhadap divisi/unit yang terkait dengan bidang tugas dan tanggung jawab masing-masing komite.	Assessment criteria are made in general and are described with qualitative explanation (ratings are not in numbers/scales) which include: 1. Attendance at Committee's meetings; 2. Mastery of the material to be discussed; 3. Willingness to provide time and efforts in fulfilling duties and responsibilities as a Committee member; 4. Willingness to participate in activities outside the office, such as visits to business units; 5. Quality and advice given in meetings; 6. Implementation of monitoring and evaluation, both periodically and annually, on matters that are the respective areas of duties and responsibilities of each committee; 7. Monitoring and correction of deviation; and 8. Implementation of monitoring and evaluation of divisions/units related to the respective areas of duties and responsibilities of each committee.

Hasil Penilaian Kinerja Komite Pendukung Dewan Komisaris
Performance Assessment Results of the Board of Commissioners' Supporting Committees

Penilaian Sendiri Self-Assessment	
Pada tahun 2023, hasil penilaian sendiri pelaksanaan tugas dan tanggung jawab Komite pendukung Dewan Komisaris berada pada kategori "Baik".	In 2023, the self-assessment results of the implementation of duties and responsibilities of the Board of Commissioners' supporting committees were under the category of "Good".
Penilaian oleh Dewan Komisaris Assessment by the Board of Commissioners	
Komite Audit: Dewan Komisaris menilai Komite Audit telah berhasil menjalankan tugasnya secara efektif selama tahun 2023. Komite Audit telah memantau, mengevaluasi perencanaan dan pelaksanaan audit, serta melakukan pemantauan terhadap tindak lanjut yang dilakukan oleh Direksi terkait pemenuhan komitmen hasil temuan dari pemeriksaan internal dan eksternal.	Audit Committee: The Board of Commissioners evaluated that the Audit Committee managed to perform its duties effectively in 2023. The Audit Committee monitored, evaluated the planning and implementation of audits, and monitored the follow-up actions taken by the Board of Directors on the fulfillment of commitments resulting from internal and external audit findings.

<p>Komite Pemantau Risiko: Dewan Komisaris menyimpulkan bahwa kinerja Komite Pemantau Risiko pada tahun 2023 dinilai efektif. Komite Pemantau Risiko telah membantu Dewan Komisaris dalam mengevaluasi dan mengkaji aspek-aspek yang terkait dengan risiko, sekaligus memberikan arahan dan saran untuk pengembangan manajemen risiko di Bank.</p>	<p>Risk Monitoring Committee: The Board of Commissioners concluded that the Risk Monitoring Committee's performance in 2023 was considered effective. The Risk Monitoring Committee assisted the Board of Commissioners in evaluating and reviewing aspects related to risk, and provided direction and advice in developing risk management at the Bank.</p>
<p>Komite Nominasi dan Remunerasi: Dewan Komisaris menilai bahwa Komite Nominasi dan Remunerasi berhasil menjalankan tugas dan tanggung jawabnya secara efektif pada tahun 2023. Komite Nominasi dan Remunerasi telah memberikan kontribusi positif dengan memberikan usulan terkait sistem dan kebijakan remunerasi yang sesuai untuk Dewan Komisaris dan Direksi. Selain itu, Komite Nominasi dan Remunerasi juga memberikan rekomendasi terkait calon anggota Dewan Komisaris, Direksi, dan pihak independen yang dapat menjadi anggota Komite kepada Dewan Komisaris.</p>	<p>Nomination and Remuneration Committee: The Board of Commissioners evaluated that the Nomination and Remuneration Committee managed to perform its duties and responsibilities effectively in 2023. The Nomination and Remuneration Committee made a positive contribution by providing recommendations regarding appropriate remuneration system and policy for the Board of Commissioners and Board of Directors. In addition, the Nomination and Remuneration Committee also provided recommendations regarding candidates for the Board of Commissioners, Board of Directors, and independent party who may become a Committee member to the Board of Commissioners.</p>

Penilaian Kinerja Komite dan Organ Pendukung Direksi

Prosedur dan Pihak yang Melakukan 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.

Performance Assessment of the Board of Directors' Supporting Committees and Organs

Procedures and Party Assessing the Performance 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.

Kriteria dan Hasil Penilaian Kinerja Komite dan Organ Pendukung Direksi

Performance Assessment Criteria and Results of the Board of Directors' Supporting Committees and Organs

Kriteria Penilaian Komite dan Organ Pendukung Direksi Assessment Criteria of the Board of Directors' Supporting Committees and Organs	
<ol style="list-style-type: none"> 1. Kehadiran dalam rapat Komite; 2. Penguasaan materi yang akan dibahas; 3. Kesiapan menyediakan waktu dan upaya dalam memenuhi tugas dan tanggung jawab sebagai anggota Komite; 4. Kesiapan berpartisipasi dalam kegiatan di luar kantor, seperti kunjungan ke unit bisnis; 5. Kualitas dan saran yang diberikan dalam rapat-rapat; 6. Terlaksananya pemantauan dan evaluasi, baik secara berkala maupun tahunan, atas hal-hal yang menjadi bidang tugas dan tanggung jawab masing-masing Komite; 7. Pemantauan dan koreksi penyimpangan; serta 8. Terlaksananya pemantauan dan evaluasi terhadap divisi/unit yang terkait dengan bidang tugas dan tanggung jawab masing-masing Komite. 	<ol style="list-style-type: none"> 1. Attendance at Committee's meetings; 2. Mastery of the material to be discussed; 3. Willingness to allocate time and efforts in fulfilling duties and responsibilities as Committee member; 4. Willingness to participate in activities outside the office, such as visits to business units; 5. Quality and advice given in the meetings; 6. Implementation of monitoring and evaluation, whether periodically or annually, on matters that are the respective areas of duties and responsibilities of each Committee; 7. Monitoring and correction of deviations; and 8. Implementation of monitoring and evaluation of divisions/units related to the respective areas of duties and responsibilities of each Committee.
Hasil Penilaian Kinerja Komite dan Organ Pendukung Direksi Performance Assessment Results of the Board of Directors' Supporting Committees and Organs	
<p>Direksi menilai bahwa selama tahun 2023, komite dan organ pendukung Direksi telah berhasil melaksanakan tugas dan tanggung jawabnya secara optimal. Penilaian ini didasarkan pada laporan berkala, masukan, dan rekomendasi yang sesuai dengan lingkup tugas Direksi, serta penerapan tugas dan tanggung jawab masing-masing yang sejalan dengan strategi dan Rencana Bisnis Bank pada tahun 2023.</p>	<p>The Board of Directors considered that throughout 2023, the Board of Directors' supporting committees and organs managed to perform their duties and responsibilities optimally. This assessment is based on periodic reports, input and recommendations that are in accordance with the scope of the Board of Directors' duties, and the implementation of their respective duties and responsibilities in line with the Bank's strategy and Business Plan for 2023.</p>

Pelatihan dan/atau Peningkatan Kompetensi Dewan Komisaris dan Direksi

Training and/or Competency Development for the Board of Commissioners and Board of Directors

Kebijakan Pelatihan dan/atau Peningkatan Kompetensi Dewan Komisaris dan Direksi

Kebijakan di seluruh level organisasi Bank, setiap karyawan memiliki kesempatan yang setara dalam dalam mendapatkan pendidikan dan pelatihan. Selain itu, program pelatihan dan/atau peningkatan kompetensi Dewan Komisaris dan Direksi diperlukan agar anggota Dewan Komisaris dan Direksi dapat senantiasa memperbarui informasi terkait perkembangan industri perbankan terkini dan peraturan perundang-undangan yang berlaku sebagai bentuk antisipasi atas masalah yang timbul di kemudian hari bagi keberlangsungan dan kemajuan Bank. Selama tahun 2023, Dewan Komisaris dan Direksi Bank telah mengikuti pelatihan dan/atau peningkatan kompetensi sebagai berikut:

Policy on Training and/or Competency Development for the Board of Commissioners and Board of Directors

The policy at all levels of the Bank's organization is that every employee has equal opportunities to receive education and training. In addition, training and/or competency development programs of the Board of Commissioners and Board of Directors are needed so that members of the Board of Commissioners and Board of Directors can always update information related to the latest developments in banking industry and the applicable laws and regulations as a form of anticipation of problems arising in the future that may affect the Bank's sustainability and progress. Throughout 2023, the Board of Commissioners and Board of Directors of the Bank attended training and/or competency developments as follows:

Nama dan Jabatan Name and Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers	
DEWAN KOMISARIS / BOARD OF COMMISSIONERS		
Zaenal Abidin, Ph.D Komisaris Utama Independen Independent President Commissioner	<ol style="list-style-type: none"> 1. <i>Outlook Banking Regulation: Tantangan Industri Perbankan, Arah Regulasi, dan Future Banking</i> (oleh Lembaga Pengembangan Perbankan Indonesia); 2. <i>Expert Sharing Session - Keuangan Berkelanjutan</i> (oleh Otoritas Jasa Keuangan Institute); 3. <i>Governance, Risk, and Compliance</i> (oleh Bank Victoria); 4. <i>Membentuk Pribadi yang Amanah dan Terpercaya</i> (oleh Bank Victoria); 5. <i>Philosophy that Flows in My Soul</i> (oleh Bank Victoria); dan 6. <i>Refreshment Sertifikasi Manajemen Risiko</i> (oleh PT Efektifpro Knowledge Source). 	<ol style="list-style-type: none"> 1. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Shaping a Trustworthy Individual (by Bank Victoria); 5. Philosophy that Flows in My Soul (by Bank Victoria); and 6. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source).
Gunawan Tenggarahardja Komisaris/ Komisaris Independen Commissioner/ Independent Commissioner	<ol style="list-style-type: none"> 1. <i>Outlook Banking Regulation: Tantangan Industri Perbankan, Arah Regulasi, dan Future Banking</i> (oleh Lembaga Pengembangan Perbankan Indonesia); 2. <i>Expert Sharing Session - Keuangan Berkelanjutan</i> (oleh Otoritas Jasa Keuangan Institute); 3. <i>Governance, Risk, and Compliance</i> (oleh Bank Victoria); 4. <i>Managing Environmental, Social and Governance Risks and Opportunities</i> (oleh Otoritas Jasa Keuangan Institute); 5. <i>Membentuk Pribadi yang Amanah dan Terpercaya</i> (oleh Bank Victoria); 6. <i>Peluang Metaverse di Industri Jasa Keuangan</i> (oleh Otoritas Jasa Keuangan Institute); 7. <i>Philosophy that Flows in My Soul</i> (oleh Bank Victoria); dan 8. <i>Refreshment Sertifikasi Manajemen Risiko</i> (oleh PT Efektifpro Knowledge Source). 	<ol style="list-style-type: none"> 1. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Managing Environmental, Social and Governance Risks and Opportunities (by Otoritas Jasa Keuangan Institute); 5. Shaping a Trustworthy Individual (by Bank Victoria); 6. Metaverse Opportunity in Financial Services Industry (by Otoritas Jasa Keuangan Institute); 7. Philosophy that Flows in My Soul (by Bank Victoria); and 8. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source).

Nama dan Jabatan Name and Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers	
Sia Leng Ho Komisaris Commissioner	<ol style="list-style-type: none"> 1. <i>Outlook Banking Regulation: Tantangan Industri Perbankan, Arah Regulasi, dan Future Banking</i> (oleh Lembaga Pengembangan Perbankan Indonesia); 2. <i>Expert Sharing Session - Keuangan Berkelanjutan</i> (oleh Otoritas Jasa Keuangan Institute); 3. <i>Governance, Risk, and Compliance</i> (oleh Bank Victoria); 4. <i>Managing Environmental, Social and Governance Risks and Opportunities</i> (oleh Otoritas Jasa Keuangan Institute); 5. <i>Membentuk Pribadi yang Amanah dan Terpercaya</i> (oleh Bank Victoria); 6. <i>Peluang Metaverse di Industri Jasa Keuangan</i> (oleh Otoritas Jasa Keuangan Institute); 7. <i>Philosophy that Flows in My Soul</i> (oleh Bank Victoria); 8. <i>Refreshment Credit SME Segmentation</i> (oleh Bank Victoria); dan 9. <i>Refreshment Sertifikasi Manajemen Risiko</i> (oleh PT Efektifpro Knowledge Source). 	<ol style="list-style-type: none"> 1. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Managing Environmental, Social and Governance Risks and Opportunities (by Otoritas Jasa Keuangan Institute); 5. Shaping a Trustworthy Individual (by Bank Victoria); 6. Metaverse Opportunity in Financial Services Industry (by Otoritas Jasa Keuangan Institute); 7. Philosophy that Flows in My Soul (by Bank Victoria); 8. Refreshment Credit SME Segmentation (by Bank Victoria); and 9. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source).
DIREKSI / BOARD OF DIRECTORS		
Achmad Friscantono Direktur Utama President Director	<ol style="list-style-type: none"> 1. <i>Expert Sharing Session - Keuangan Berkelanjutan</i> (oleh Otoritas Jasa Keuangan Institute); 2. <i>Governance, Risk, and Compliance</i> (oleh Bank Victoria); 3. <i>Membentuk Pribadi yang Amanah dan Terpercaya</i> (oleh Bank Victoria); 4. <i>Mini Town Hall</i> (oleh Bank Victoria); 5. <i>Outbond: Working Together in Harmony</i> (oleh Bank Victoria); 6. <i>Outlook Banking Regulation: Tantangan Industri Perbankan, Arah Regulasi, dan Future Banking</i> (oleh Lembaga Pengembangan Perbankan Indonesia); 7. <i>Philosophy that Flows in My Soul</i> (oleh Bank Victoria); 8. <i>Refreshment Credit SME Segmentation</i> (oleh Bank Victoria); 9. <i>Refreshment Sertifikasi Manajemen Risiko</i> (oleh PT Efektifpro Knowledge Source); dan 10. <i>Refreshment Sertifikasi Treasury</i> (oleh Association Cambiste Internationale Financial Market Association Indonesia). 	<ol style="list-style-type: none"> 1. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 2. Governance, Risk, and Compliance (by Bank Victoria); 3. Shaping a Trustworthy Individual (by Bank Victoria); 4. Mini Town Hall (by Bank Victoria); 5. Outbond: Working Together in Harmony (by Bank Victoria); 6. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 7. Philosophy that Flows in My Soul (by Bank Victoria); 8. Refreshment Credit SME Segmentation (by Bank Victoria); 9. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source); and 10. Treasury Certification Refreshment (by Association Cambiste Internationale Financial Market Association Indonesia).
Rusli Wakil Direktur Utama Deputy President Director	<ol style="list-style-type: none"> 1. Aspek Hukum dan Dokumen Pembukaan Rekening Perusahaan (oleh Bank Victoria); 2. DEG South East Asia Client Forum 2023 “<i>Shaping Transformation</i>” (oleh DEG South East Asia Client Forum); 3. <i>Expert Sharing Session - Keuangan Berkelanjutan</i> (oleh Otoritas Jasa Keuangan Institute); 4. <i>Governance, Risk, and Compliance</i> (oleh Bank Victoria); 5. <i>Membentuk Pribadi yang Amanah dan Terpercaya</i> (oleh Bank Victoria); 6. <i>Mini Town Hall</i> (oleh Bank Victoria); 7. <i>Outbond: Together We Growth</i> (oleh Bank Victoria); 8. <i>Outbond: Together We Can Do More Great Things</i> (oleh Bank Victoria); 9. <i>Outlook Banking Regulation: Tantangan Industri Perbankan, Arah Regulasi, dan Future Banking</i> (oleh Lembaga Pengembangan Perbankan Indonesia); 10. <i>Philosophy that Flows in My Soul</i> (oleh Bank Victoria); 11. <i>Refreshment Credit SME Segmentation</i> (oleh Bank Victoria); 12. <i>Refreshment Sertifikasi Manajemen Risiko</i> (oleh PT Efektifpro Knowledge Source); dan 13. Undangan <i>International Talks 2023</i> (oleh Bank Indonesia). 	<ol style="list-style-type: none"> 1. Legal Aspect and Documents for Opening a Corporate Account (by Bank Victoria); 2. DEG South East Asia Client Forum 2023 “Shaping Transformation” (by DEG South East Asia Client Forum); 3. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 4. Governance, Risk, and Compliance (by Bank Victoria); 5. Shaping a Trustworthy Individual (by Bank Victoria); 6. Mini Town Hall (by Bank Victoria); 7. Outbond: Together We Growth (by Bank Victoria); 8. Outbond: Together We Can Do More Great Things (by Bank Victoria); 9. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 10. Philosophy that Flows in My Soul (by Bank Victoria); 11. Refreshment Credit SME Segmentation (by Bank Victoria); 12. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source); and 13. Invitation International Talks 2023 (by Bank Indonesia).
Lembing Direktur Director	<ol style="list-style-type: none"> 1. <i>Outlook Banking Regulation: Tantangan Industri Perbankan, Arah Regulasi, dan Future Banking</i> (oleh Lembaga Pengembangan Perbankan Indonesia); 2. <i>Expert Sharing Session - Keuangan Berkelanjutan</i> (oleh Otoritas Jasa Keuangan Institute); 3. <i>Governance, Risk, and Compliance</i> (oleh Bank Victoria); 4. <i>Managing Environmental, Social and Governance Risks and Opportunities</i> (oleh Otoritas Jasa Keuangan Institute); 5. <i>Membentuk Pribadi yang Amanah dan Terpercaya</i> (oleh Bank Victoria); 6. <i>Mini Town Hall</i> (oleh Bank Victoria); 7. <i>Philosophy that Flows in My Soul</i> (oleh Bank Victoria); 8. <i>Refreshment Credit SME Segmentation</i> (oleh Bank Victoria); dan 9. <i>Refreshment Sertifikasi Manajemen Risiko</i> (oleh PT Efektifpro Knowledge Source). 	<ol style="list-style-type: none"> 1. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Managing Environmental, Social and Governance Risks and Opportunities (by Otoritas Jasa Keuangan Institute); 5. Shaping a Trustworthy Individual (by Bank Victoria); 6. Mini Town Hall (by Bank Victoria); 7. Philosophy that Flows in My Soul (by Bank Victoria); 8. Refreshment Credit SME Segmentation (by Bank Victoria); dan 9. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source).

Nama dan Jabatan Name and Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers	
<p>Debora Wahjutiarto Tanoyo Direktur Director</p>	<ol style="list-style-type: none"> 1. <i>Outlook Banking Regulation: Tantangan Industri Perbankan, Arah Regulasi, dan Future Banking</i> (oleh Lembaga Pengembangan Perbankan Indonesia); 2. <i>Expert Sharing Session - Keuangan Berkelanjutan</i> (oleh Otoritas Jasa Keuangan Institute); 3. <i>Governance, Risk, and Compliance</i> (oleh Bank Victoria); 4. <i>Managing Environmental, Social and Governance Risks and Opportunities</i> (oleh Otoritas Jasa Keuangan Institute); 5. <i>Membentuk Pribadi yang Amanah dan Terpercaya</i> (oleh Bank Victoria); 6. <i>Mini Town Hall</i> (oleh Bank Victoria); 7. <i>Philosophy that Flows in My Soul</i> (oleh Bank Victoria); dan 8. <i>Refreshment Sertifikasi Manajemen Risiko</i> (oleh PT Efektifpro Knowledge Source). 	<ol style="list-style-type: none"> 1. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Managing Environmental, Social and Governance Risks and Opportunities (by Otoritas Jasa Keuangan Institute); 5. Shaping a Trustworthy Individual (by Bank Victoria); 6. Mini Town Hall (by Bank Victoria); 7. Philosophy that Flows in My Soul (by Bank Victoria); dan 8. Risk Management Certification Refreshment
<p>Tamunan Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management</p>	<ol style="list-style-type: none"> 1. <i>Outlook Banking Regulation: Tantangan Industri Perbankan, Arah Regulasi, dan Future Banking</i> (oleh Lembaga Pengembangan Perbankan Indonesia); 2. <i>Expert Sharing Session - Keuangan Berkelanjutan</i> (oleh Otoritas Jasa Keuangan Institute); 3. <i>Governance, Risk, and Compliance</i> (oleh Bank Victoria); 4. <i>Membentuk Pribadi yang Amanah dan Terpercaya</i> (oleh Bank Victoria); 5. <i>Outbond: Change the Future</i> (oleh Bank Victoria); 6. <i>Philosophy that Flows in My Soul</i> (oleh Bank Victoria); 7. <i>Refreshment Sertifikasi Manajemen Risiko</i> (oleh PT Efektifpro Knowledge Source); 8. Resertifikat "Sertifikasi Kompetensi Manajemen Risiko Perbankan - Kualifikasi 7" (oleh Lembaga Sertifikasi Profesional Perbankan); 9. Sosialisasi Kebijakan <i>Risk Register</i> (oleh Bank Victoria); 10. <i>Managing Environmental, Social and Governance Risks and Opportunities</i> (oleh Otoritas Jasa Keuangan Institute); 11. Sosialisasi Penguatan Kerangka Hukum terkait Pencegahan dan Pemberantasan Pendanaan Proliferasi Senjata Pemusnah Massal (dari Pusat Pelaporan dan Analisis Transaksi Keuangan); 12. Webinar dengan tema "Peluang, Harapan dan Tantangan Perekonomian Nasional" (oleh Forum Komunikasi Direktur Kepatuhan Perbankan); 13. Seminar Otoritas Jasa Keuangan <i>Carbon</i> (oleh Otoritas Jasa Keuangan); 14. <i>4th Legal Forum "Urgensi Regulatory Technology dan Digital Evidence dalam Mendukung Efektivitas Penegakan Hukum Tindak Pidana Pencucian Uang dan Tindak Pidana Pendanaan Terorisme</i> (oleh Forum Komunikasi Direktur Kepatuhan Perbankan); 15. <i>Focus Group Discussion "Implementasi Anti Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal dan Kewajiban Pelaporan"</i> (oleh Forum Komunikasi Direktur Kepatuhan Perbankan); 16. Undangan Kegiatan "<i>Risk and Governance Summit 2023</i>" (oleh Otoritas Jasa Keuangan); dan 17. Diseminasi Pusat Pelaporan dan Analisis Transaksi Keuangan "<i>Securing Hasil Tindak Pidana Lintas Batas Negara Melalui Implementasi Regulasi Mengenai Penundaan, Penghentian, dan Pemblokiran</i> (oleh Pusat Pelaporan dan Analisis Transaksi Keuangan). 	<ol style="list-style-type: none"> 1. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Shaping a Trustworthy Individual (by Bank Victoria); 5. Outbond: Change the Future (by Bank Victoria); 6. Philosophy that Flows in My Soul (by Bank Victoria); 7. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source); 8. Recertificate "Banking Risk Management Competency Certification - Qualification 7" (by Banking Professionals Certification Institute); 9. Dissemination of Risk Register Risk (by Bank Victoria); 10. Managing Environmental, Social and Governance Risks and Opportunities (by Otoritas Jasa Keuangan Institute); 11. Dissemination of Strengthening Legal Framework on the Prevention and Eradication of Funding for Proliferation of Weapons of Mass Destruction (by Financial Transaction Reports and Analysis Center); 12. Webinar with a theme "Opportunities, Hopes and Challenges of National Economy" (by Banking Compliance Directors Communication Forum); 13. Financial Services Authority Seminar: <i>Carbon</i> (by Financial Services Authority); 14. <i>4th Legal Forum "The Urgency of Regulatory Technology and Digital Evidence in Supporting the Effectiveness of Law Enforcement in Crimes of Money Laundering and Counter Terrorism Financing</i> (by Banking Compliance Directors Communication Forum); 15. Focus Group Discussion "Implementation of Anti Money Laundering, Counter Terrorism Financing, and Prevention of Funding for Proliferation of Weapons of Mass Destruction and Reporting Obligation" (by Banking Compliance Directors Communication Forum); 16. Event Invitation "Risk and Governance Summit 2023" (by Financial Services Authority); and 17. Dissemination by Financial Transaction Reports and Analysis Center "Securing Proceeds of Cross-Border Crimes Through the Implementation of Regulations on Postponement, Termination and Blocking" (by Financial Transaction Reports and Analysis Center).

Program Orientasi bagi Anggota Dewan Komisaris dan Direksi yang Baru Diangkat

Bank Victoria memiliki program orientasi dan pengenalan bagi anggota Dewan Komisaris dan Direksi baru diangkat. Program ini bertujuan untuk memberikan pemahaman tentang visi, misi, dan nilai Bank Victoria, Kode Etik, struktur organisasi, bidang usaha, pedoman dan tata tertib kerja Dewan Komisaris dan Direksi serta peraturan-peraturan perbankan. *Corporate Secretary* menjadi penanggung jawab pelaksanaan program orientasi ini.

Orientation Program for Newly Appointed Members of Board of Commissioners and Board of Directors

Bank Victoria has an orientation and introduction program for newly appointed members of the Board of Commissioners and Board of Directors. This program aims to provide an understanding of Bank Victoria's vision, mission, and values, Code of Conduct, organizational structure, line of business, charters and conduct for the Board of Commissioners and Board of Directors, and banking regulations. The *Corporate Secretary* is in charge of the implementation of this orientation program.

Penanganan Benturan Kepentingan Dewan Komisaris dan Direksi

Handling of Conflict of Interests of the Board of Commissioners and Board of Directors

Seluruh anggota Dewan Komisaris dan Direksi dilarang berada di situasi atau kondisi tertentu di mana kepentingan anggota Dewan Komisaris dan/atau Direksi bertentangan dengan kepentingan Bank. Namun, apabila terjadi benturan kepentingan, maka harus diungkapkan dan anggota Dewan Komisaris dan/atau Direksi yang bersangkutan tidak boleh melibatkan diri dalam proses pengambilan keputusan Bank yang berkaitan dengan benturan kepentingan tersebut.

All members of the Board of Commissioners and Board of Directors are prohibited from being in certain situation or condition in which the interests of members of the Board of Commissioners and/or Board of Directors conflict with the interests of the Bank. However, in case of any conflict of interest, such conflict must be disclosed and the relevant member of the Board of Commissioners and/or Board of Directors is prohibited from being involved in any of the Bank's decision-making process related to such conflict of interest.

Mekanisme Pengunduran Diri dan Pemberhentian Dewan Komisaris dan Direksi

Resignation and Dismissal Mechanism of the Board of Commissioners and Board of Directors

Mekanisme Pengunduran Diri

Bank telah menetapkan mekanisme pengunduran diri Dewan Komisaris dan Direksi dalam Anggaran Dasar yang diuraikan sebagai berikut:

1. Seorang anggota Dewan Komisaris dan Direksi dapat mengundurkan diri dari jabatannya dengan menyampaikan permohonan secara tertulis kepada Bank;
2. Bank Wajib menyelenggarakan RUPS untuk memutuskan permohonan pengunduran diri anggota Direksi dalam jangka waktu 90 hari setelah diterimanya surat pengunduran diri;

Resignation Mechanism

The Bank has established a mechanism for the resignation of the Board of Commissioners and Board of Directors in the Articles of Association, described as follows:

1. A member of the Board of Commissioners and Board of Directors may resign from the position by submitting a written request to the Bank;
2. The Bank is required to hold a GMS to resolve on resignation request of members of the Board of Directors within 90 days after receipt of the resignation letter;

3. Bank wajib melakukan keterbukaan informasi kepada masyarakat dan menyampaikan kepada Otoritas Jasa Keuangan paling lambat 2 (dua) hari kerja setelah diterimanya permohonan pengunduran diri Direksi; dan
4. Jika oleh suatu sebab jabatannya anggota Direksi kosong, dan jumlah anggota Direksi menjadi kurang dari 3 (tiga) orang, maka selambat-lambatnya 90 hari kalender setelah kekosongan itu harus diadakan RUPS untuk mengisi kekosongan tersebut dengan memperhatikan peraturan perundang-undangan yang berlaku di bidang pasar modal.

Mekanisme Pemberhentian

Selain pengunduran diri secara sukarela, Dewan Komisaris dan Direksi Bank dapat diberhentikan sewaktu-waktu dengan mekanisme sebagai berikut:

1. Anggota Dewan Komisaris dan Direksi dapat diberhentikan untuk sementara oleh RUPS dengan dengan menyebutkan alasannya setelah anggota Dewan Komisaris dan Direksi yang bersangkutan diberi kesempatan untuk membela diri;
2. Anggota Direksi dapat diberhentikan untuk sementara oleh Dewan Komisaris dengan menyebutkan alasannya;
3. Pemberhentian sementara anggota Direksi wajib disampaikan secara tertulis;
4. Dewan Komisaris harus menyelenggarakan RUPS untuk mencabut atau menguatkan keputusan pemberhentian sementara;
5. RUPS wajib diselenggarakan dalam jangka waktu paling lambat 90 hari setelah tanggal pemberhentian sementara;
6. Jika dalam waktu yang ditentukan RUPS tidak dapat mengambil keputusan, maka pemberhentian sementara menjadi batal;
7. Anggota Direksi yang diberhentikan sementara tidak berwenang untuk menjalankan kepengurusan Bank dan mewakili Bank di dalam maupun di luar pengadilan;
8. Batas kewenangan anggota Direksi berlaku sejak dikeluarkannya keputusan pemberhentian sementara oleh Dewan Komisaris sampai dengan dikeluarkannya keputusan RUPS yang menguatkan atau membatalkan pemberhentian sementara dan terlampainya jangka waktu penyelenggaraan RUPS; dan
9. Apabila anggota Direksi yang diberhentikan sementara tersebut tidak hadir dalam RUPS maka anggota Direksi yang diberhentikan sementara tersebut dianggap tidak menggunakan haknya untuk membela dirinya dalam RUPS, dengan demikian anggota Direksi yang diberhentikan sementara tersebut menerima keputusan RUPS.

3. The Bank is required to disclose information to the public and submit it to the Financial Services Authority no later than 2 (two) working days after receiving the request for resignation of the Board of Directors; and
4. In the event that one position of Board of Directors is vacant, and the number of the Board of Directors is less than 3 (three) members, then no later than 90 calendar days after the vacancy, a GMS must be held to fill the vacancy by considering the applicable laws and regulations in the capital market.

Dismissal Mechanism

In addition to voluntary resignation, the Bank's Board of Commissioners and Board of Directors may be dismissed at any time by using the following mechanism:

1. Members of the Board of Commissioners and Board of Directors can be suspended by the GMS by stating the reasons after the members of the Board of Commissioners and Board of Directors concerned are given a chance to defend themselves;
2. Members of the Board of Directors may be suspended by the Board of Commissioners by stating the reasons;
3. The suspension of a member of the Board of Directors must be conveyed in writing;
4. The Board of Commissioners must hold a GMS to revoke or confirm the suspension decision;
5. The GMS must be held no later than 90 days after the suspension date;
6. If within the specified time the GMS cannot adopt a resolution, then the suspension will be cancelled;
7. Members of the Board of Directors who are suspended are not authorized to carry out the management of the Bank and represent the Bank in or out of court;
8. The limits of authority of the Board of Directors' members apply from the issuance of a suspension decision by the Board of Commissioners until the issuance of a GMS resolution confirming or canceling the suspension and until the time period for holding the GMS is exceeded; and
9. If the suspended members of the Board of Directors do not attend the GMS, such members are deemed not to have exercised their right to defend themselves at the GMS, thus the suspended members of the Board of Directors accepts the GMS resolutions.

Kebijakan Keberagaman Komposisi Dewan Komisaris dan Direksi

Diversity Policy of Composition of the Board of Commissioners and Board of Directors

Keberagaman komposisi Dewan Komisaris dan Direksi merupakan salah satu upaya yang dilakukan Bank Victoria untuk menguatkan peran, fungsi dan tugas Dewan Komisaris dan Direksi. Informasi keberagaman komposisi Dewan Komisaris dan Direksi Bank dapat dilihat pada bagian Profil Dewan Komisaris dan Profil Direksi.

The diversity of composition of the Board of Commissioners and Board of Directors is one of the efforts made by Bank Victoria to strengthen the roles, functions, and duties of the Board of Commissioners and Board of Directors. Information on the diversity of composition of the Board of Commissioners and Board of Directors can be seen in the Profile section of the Board of Commissioners and Board of Directors.

Kebijakan Nominasi dan Remunerasi Dewan Komisaris dan Direksi

Nomination and Remuneration Policy of the Board of Commissioners and Board of Directors

Kebijakan Nominasi

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.

Proses Seleksi Calon Anggota Dewan Komisaris dan Direksi

Proses seleksi calon anggota Dewan Komisaris dan Direksi Bank sebagai berikut:

1. Komite Nominasi dan Remunerasi mengidentifikasi calon yang memenuhi kriteria;
2. Dewan Komisaris atas dasar saran Komite Nominasi dan Remunerasi menyampaikan kepada Pemegang Saham; dan
3. Pelaksanaan seleksi dilaksanakan sebelum masa jabatan berakhir, diminta atau apabila ada kekosongan Direksi.

Kriteria Dewan Komisaris dan Direksi

Seluruh calon anggota Dewan Komisaris dan Direksi harus memenuhi persyaratan yang diatur dalam *BOC Charter* dan *BOD Charter* sebelum diangkat menjadi anggota Dewan Komisaris dan Direksi Bank, yang diuraikan sebagai berikut:

Nomination Policy

Based on the Nomination and Remuneration Committee's Charter, the Nomination and Remuneration Committee has the duty to establish a nomination system for 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 members of the Board of Commissioners and Board of Directors.

Selection Process for Candidates for the Board of Commissioners and Board of Directors

The selection process for candidates for the Bank's Board of Commissioners and Board of Directors is as follows:

1. The Nomination and Remuneration Committee identifies candidates who meet the criteria;
2. The Board of Commissioners based on recommendation from the Nomination and Remuneration Committee submits to the Shareholders; and
3. 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.

Criteria of the Board of Commissioners and Board of Directors

All candidates for the Board of Commissioners and Board of Directors must meet the requirements set out in the BOC Charter and BOD Charter prior to being appointed as members of the Bank's Board of Commissioners and Board of Directors, which are described as follows:

- | | |
|---|---|
| <p>1. Persyaratan Formal</p> <ol style="list-style-type: none"> a. Cakap melakukan perbuatan hukum; b. Dalam 5 (lima) tahun sebelum pengangkatan dan selama menjabat: <ol style="list-style-type: none"> 1) Tidak pernah dinyatakan pailit; 2) Tidak pernah menjadi anggota Dewan Komisaris dan/atau 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; serta 4) Tidak pernah menjadi anggota Dewan Komisaris dan/atau Direksi yang selama menjabat: <ul style="list-style-type: none"> • Pernah tidak menyelenggarakan RUPS Tahunan; • Pertanggungjawabannya sebagai anggota Dewan Komisaris dan/atau Direksi pernah tidak diterima oleh RUPS atau pernah tidak memberikan pertanggungjawaban sebagai anggota Dewan Komisaris dan/atau 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. <p>2. Persyaratan Material</p> <ol style="list-style-type: none"> 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. <p>3. Persyaratan Lainnya</p> <ol style="list-style-type: none"> 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; 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); c. Komisaris non-independen tidak termasuk rangkap jabatan dalam menjalankan tugas fungsional dari Pemegang Saham yang berbentuk badan hukum pada kelompok usaha Bank; dan d. 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. | <p>1. Formal Requirements</p> <ol style="list-style-type: none"> a. Capable in performing legal actions; b. Within 5 (five) years before appointment and during the term of office: <ol style="list-style-type: none"> 1) Never been declared bankrupt; 2) Never become a member of Board of Commissioners and/or 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 state finances and/or related to the financial sector; and 4) Never been a member of Board of Commissioners and/or Board of Directors who during the term of office: <ul style="list-style-type: none"> • Has ever not convening an Annual GMS; • Has ever had his/her accountability as the member of Board of Commissioners and/or Board of Directors rejected by the GMS or has ever been absent in giving his/her accountability as the member of Board of Commissioners and/or 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 to submit its Annual Report and/or Financial Statements to the Financial Services Authority. <p>2. Material Requirements</p> <ol style="list-style-type: none"> 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. <p>3. Other Requirements</p> <ol style="list-style-type: none"> 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. 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); 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; and d. 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. |
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Kebijakan Remunerasi Dewan Komisaris dan Direksi

Remunerasi diberikan kepada Dewan Komisaris dan Direksi sebagai bentuk penghargaan atas pelaksanaan tugas dan tanggung jawab yang telah dilaksanakan dengan baik selama tahun buku. Sesuai dengan ketentuan 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, Bank Victoria telah mengimplementasikan kebijakan remunerasi yang sesuai dengan Keputusan Dewan Komisaris No. 001/SK-KOM/09/18 tanggal 20 September 2018 tentang Pedoman Komite Nominasi dan Remunerasi PT Bank Victoria International Tbk.

Prosedur Penetapan Remunerasi Dewan Komisaris dan Direksi

Penetapan remunerasi bagi Dewan Komisaris dan Direksi dilakukan dengan mengikuti prosedur sebagai berikut:

1. Proses pengajuan usulan jenis dan besaran remunerasi oleh Direksi kepada Dewan Komisaris atau oleh Dewan Komisaris sendiri;
2. Usulan tersebut akan ditelaah oleh Komite Nominasi dan Remunerasi dengan mempertimbangkan indikator-indikator tertentu;
3. Hasil penelaahan akan dijadikan sebagai rekomendasi dan dasar pertimbangan bagi Dewan Komisaris untuk diajukan kepada RUPS; dan
4. RUPS memutuskan besaran remunerasi Dewan Komisaris dan Direksi.

Jenis dan Indikator Penetapan Remunerasi Dewan Komisaris dan Direksi

Indikator penetapan remunerasi Dewan Komisaris dan Direksi Bank mempertimbangkan skala usaha, kompleksitas usaha, *peer group*, tingkat inflasi, kondisi dan kemampuan keuangan Bank, dan tidak bertentangan dengan peraturan perundang-undangan yang berlaku. Sementara 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:

1. Remunerasi yang Bersifat Tetap
Remunerasi ini diberikan dalam bentuk tunai dan dapat juga disertai dengan pemberian remunerasi dalam bentuk tidak tunai serta tidak dikaitkan dengan kinerja dan risiko. Remunerasi ini terdiri dari gaji pokok, fasilitas, tunjangan perumahan, tunjangan kesehatan, tunjangan pendidikan, tunjangan hari raya, dan pensiun.
2. Tunjangan yang Bersifat Variabel
Remunerasi ini dikaitkan dengan kinerja dan risiko serta diberikan dalam bentuk tunai dan saham atau instrumen yang berbasis saham yang diterbitkan Bank. Remunerasi ini diberikan dalam bentuk bonus atau bentuk lain yang dipersamakan dengan itu.

Remuneration Policy of the Board of Commissioners and Board of Directors

Remuneration is given to the Board of Commissioners and Board of Directors as a form of appreciation for performing their duties and responsibilities properly in the fiscal year. Pursuant to the 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, Bank Victoria has implemented remuneration policy in accordance with Board of Commissioners' Decision Letter No. 001/SK-KOM/09/18 dated 20 September 2018 on Guidelines of Nomination and Remuneration Committee of PT Bank Victoria International Tbk.

Procedure for Determining Remuneration for the Board of Commissioners and Board of Directors

Determination of remuneration for the Board of Commissioners and Board of Directors is carried out by following the procedures below:

1. The process of proposing remuneration types and amount by the Board of Directors to the Board of Commissioners or by the Board of Commissioners itself;
2. The proposal will be reviewed by the Nomination and Remuneration Committee by considering specific indicators;
3. The review result will be the recommendation and basis for consideration for the Board of Commissioners to be proposed in the GMS; and
4. GMS determines the remuneration amount for the Board of Commissioners and Board of Directors.

Types and Indicators to Determine Remuneration for the Board of Commissioners and Board of Directors

Indicators for determining the remuneration for the Bank's Board of Commissioners and Board of Directors consider the business scale, business complexity, peer group, inflation rate, financial condition and capability of the Bank, and do not conflict with the applicable laws and regulations. Meanwhile, the variable remuneration is applied specifically to promote prudent risk taking and consider the most affecting risk in the business activities (main risks).

Based on relevant regulations and policies, the remuneration for the Board of Commissioners and Board of Directors consists of:

1. Fixed Remuneration
This remuneration is given in cash and can also be accompanied with non-cash remuneration that is not related to performance and risk. This remuneration consists of basic salary, facilities, housing allowance, health allowance, education allowance, holiday allowance, and retirement plan.
2. Variable Allowance
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. This remuneration is given in the form of bonus or other similar forms.

Pelaksanaan Kaji Ulang dan Independensi Penerapan Kebijakan Remunerasi

Dalam rangka memastikan independensi pemberian remunerasi terhadap seluruh karyawan termasuk karyawan di unit kontrol, maka Bank Victoria memastikan evaluasi kinerja dan penentuan remunerasi yang dilakukan melalui pengawasan dan kajian hingga Komite Nominasi dan Remunerasi. Bank Victoria secara berkala melakukan kaji ulang atas kebijakan remunerasi yang didasarkan atas kinerja, risiko, kewajaran dengan *peer group*, sasaran, strategi jangka panjang Bank, pemenuhan cadangan sebagaimana diatur dalam peraturan perundang-undangan, dan potensi pendapatan Bank di masa yang akan datang.

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

Remunerasi Dewan Komisaris dan Direksi dapat ditangguhkan atau ditarik kembali jika Bank mengalami kerugian yang mengakibatkan pembagian remunerasi tidak dapat dilakukan secara penuh atau hanya bersifat variabel dengan nilai yang relatif kecil. Hal ini sesuai dengan ketentuan peraturan pemberian remunerasi bagi Bank Umum.

Selain itu, Bank wajib menangguhkan atau menarik kembali pembayaran remunerasi variabel Dewan Komisaris dan Direksi (*malus* atau *clawback*) jika Bank mengalami kerugian akibat kondisi yang merugikan keuangan Bank, seperti *fraud* oleh pihak yang menjadi MRT atau kondisi lainnya. Penangguhan dapat dilaksanakan dengan jangka waktu minimal selama 3 (tiga) tahun dan dapat disesuaikan menjadi lebih panjang, sesuai dengan jangka waktu risiko. Dalam hal tersebut, Dewan Komisaris dan Direksi dilarang melakukan lindung nilai terhadap remunerasi variabel yang ditangguhkan.

Kaitan Remunerasi dengan Risiko dan Kinerja

Penetapan remunerasi variabel Dewan Komisaris dan Direksi disesuaikan dengan risiko utama yang dihadapi Bank, berdasarkan kriteria dan dampak risiko. Jika risiko utama terjadi, remunerasi Dewan Komisaris dan Direksi sebagai MRT akan terpengaruh. Selain itu, penetapan remunerasi variabel juga disesuaikan dengan

Review and Independence of Remuneration Policy Implementation

To ensure independence of remuneration for all employees including employees in the control unit, Bank Victoria ensures that performance evaluation and remuneration is determined by supervision and review to the Nomination and Remuneration Committee. Bank Victoria periodically reviews its remuneration policy based on performance, risk, fairness with peer groups, targets, long-term strategy of the Bank, fulfillment of reserves as stipulated in laws and regulations, and potential income of the Bank in the future.

Establishing Material Risk Takers

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 remuneration of the Board of Commissioners and Board of Directors can be suspended or clawback if the Bank suffers a loss which results in remuneration unable to be distributed in full or in a variable nature with a relatively small value. This is in accordance with the provisions of providing remuneration for Commercial Banks.

In addition, the Bank must suspend or withdraw the payment of variable remuneration for the Board of Commissioners and Board of Directors (*malus* or *clawback*) if the Bank suffers a loss due to conditions that cause losses to the Bank's finances, such as fraud by parties who are MRT or other conditions. Suspension can be carried out with a minimum period of 3 (three) years and can be adjusted to be longer, according to the risk period. In this case, the Board of Commissioners and Board of Directors are prohibited from hedging on deferred 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, based on the criteria and risk impacts. If the main risk occurs, the remuneration for the Board of Commissioners and Board of Directors as the MRT will be affected. In addition,

pengukuran kinerja individu dan kolegal oleh Dewan Komisaris dan Direksi. Berdasarkan hasil pengukuran kinerja, Komite Nominasi dan Remunerasi memberikan masukan/rekomendasi kepada Dewan Komisaris mengenai besaran remunerasi yang sesuai. Rekomendasi tersebut kemudian disampaikan kepada RUPS untuk penetapan remunerasi Dewan Komisaris dan Direksi.

Konsultan terkait Kebijakan Remunerasi

Dalam merumuskan kebijakan remunerasi, Bank tidak menggunakan jasa konsultan.

Struktur dan Besaran Remunerasi Dewan Komisaris dan Direksi

Remunerasi Dewan Komisaris dan Direksi terdiri dari remunerasi tetap (honorarium, benefit seperti asuransi kesehatan, kendaraan dinas, BPJS Ketenagakerjaan, dan THR), serta remunerasi variabel (tantiem/gratifikasi dan saham). Pembayaran dapat dilakukan secara tunai atau non-tunai, yakni dalam bentuk natura (rumah, kendaraan dinas, serta bentuk lainnya yang dapat dimiliki maupun tidak dapat dimiliki) dan saham. Besaran remunerasi yang bersifat variabel disesuaikan dengan kinerja, tugas, dan tanggung jawab masing-masing anggota Dewan Komisaris dan Direksi.

Pada tahun 2023, remunerasi Dewan Komisaris dan Direksi Bank Victoria sebagai berikut:

Remunerasi Dewan Komisaris dan Direksi berdasarkan Jenis

Remuneration for the Board of Commissioners and Board of Directors by Type

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)	2	2,482,700,000	5	12,454,017,200
Remunerasi Bersifat Variabel (Bonus) Variable Remuneration (Bonus)	2	792,954,993	5	4,502,746,513
Total		3,275,654,993		16,956,763,713

Remunerasi Dewan Komisaris dan Direksi berdasarkan Bentuk

Remuneration for the Board of Commissioners and Board of Directors by 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	2	3,275,654,993	5	16,956,763,713
Remunerasi dalam Bentuk Natura Remuneration in the form of Natura	-	-	-	-

determination of variable remuneration is also adjusted to the Board of Commissioners and Board of Directors' individual and collegial performance. Based on the performance assessment results, the Nomination and Remuneration Committee gives an input/recommendation to the Board of Commissioners regarding the proper amount of remuneration. Such recommendation is then submitted to the GMS to determine the remuneration for the Board of Commissioners and Board of Directors.

Consultant regarding Remuneration Policy

In formulating remuneration policies, the Bank has not used consultant services.

Remuneration Structure and Amount for the Board of Commissioners and Board of Directors

Remuneration for the Board of Commissioners and Board of Directors consists of fixed remuneration (honorarium, benefits such as health insurance, official vehicle, BPJS Employment, and THR), and variable remuneration (tantiem/gratification and shares). Payments can be made in cash or non-cash, i.e. in the form of natura facilities (house, official vehicle, and other forms that may or may not be owned) and shares. The amount of variable remuneration is adjusted to the performance, duties, and responsibilities of each member of the Board of Commissioners and Board of Directors.

In 2023, the remuneration for the Board of Commissioners and Board of Directors of Bank Victoria was as follows:

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 Saham Remuneration in the form of Shares	-	-	-	-
Total		3,275,654,993		16,956,763,713

Kelompok Remunerasi Dewan Komisaris dan Direksi Remuneration Group of the 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	-	2
Di atas Rp1 miliar - Rp2 miliar Above Rp1 billion - Rp2 billion	-	2
Di atas Rp500 juta - Rp1 miliar Above Rp500 million - Rp1 billion	2	1
Di bawah Rp500 juta Below Rp500 million	1	-

Remunerasi yang Ditangguhkan atau Ditarik Kembali

Pada tahun 2023, tidak terdapat remunerasi Dewan Komisaris dan Direksi yang ditangguhkan atau ditarik kembali.

Suspended or Clawback Remuneration

In 2023, 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

Pada tahun 2023, Dewan Komisaris dan Direksi Bank tidak mendapat bonus kinerja, bonus non-kinerja, dan opsi saham.

Disclosure of Performance Bonus, Non-Performance Bonus, and Stock Option

In 2023, the Bank's Board of Commissioners and Board of Directors did not receive performance bonus, non-performance bonus, or stock option.

Rasio Gaji Tertinggi dan Terendah

Bank Victoria selalu memperhatikan kesesuaian rasio gaji antara Dewan Komisaris, Direksi, dan seluruh karyawan, dengan mempertimbangkan tingkat tugas dan tanggung jawab. Informasi rasio gaji Bank Victoria untuk tahun 2023 sebagai berikut:

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 employees, by considering the level of duties and responsibilities. Information on Bank Victoria's salary ratio for 2023 is as follows:

Uraian	Rasio Ratio	Description
Gaji Tertinggi dan Terendah Dewan Komisaris	1:0.8	Board of Commissioners' Highest and Lowest Salary
Gaji Tertinggi dan Terendah Direksi	1:0.6	Board of Directors' Highest and Lowest Salary
Gaji Tertinggi dan Terendah Karyawan	1:0.04	Employees' Highest and Lowest Salary

Komite di bawah Dewan Komisaris

Board of Commissioners' Subordinate Committees

Dewan Komisaris membentuk Komite Pemantau Risiko, Komite Nominasi dan Remunerasi, dan Komite Audit untuk mendukung efektivitas pelaksanaan tugas dan tanggung jawab Dewan Komisaris serta memastikan pengelolaan Bank sesuai dengan prinsip-prinsip GCG.

Komite Pemantau Risiko

Komite Pemantau Risiko membantu Dewan Komisaris dalam menerapkan prinsip-prinsip GCG terutama terkait manajemen risiko. Komite Pemantau Risiko mengawasi proses perbaikan berkelanjutan di Bank, memastikan kepatuhan terhadap kebijakan, prosedur, dan praktik risiko di semua tingkat organisasi, serta menjamin pelaksanaan manajemen risiko yang efektif dan terkendali.

Pedoman Komite Pemantau Risiko

Pelaksanaan tugas Komite Pemantau Risiko mengacu pada Pedoman Kerja Komite Pemantau Risiko yang dimutakhirkan melalui Keputusan Dewan Komisaris No. 002/SK-KOM/12/23 tanggal 6 Desember 2023 tentang Pedoman dan Tata Tertib Kerja Komite Pemantau Risiko PT Bank Victoria International Tbk.

Tugas dan Tanggung Jawab Komite Pemantau Risiko

Tugas dan tanggung jawab Komite Pemantau Risiko sebagai berikut:

1. 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;
2. Melakukan pengawasan atas kegiatan Satuan Kerja Manajemen Risiko dalam memantau pelaksanaan mitigasi risiko oleh Unit-Unit Kerja terkait;
3. Melakukan pengawasan atas pelaksanaan rekomendasi Komite oleh Satuan Kerja Manajemen Risiko;
4. Melakukan analisis dan evaluasi atas usulan Rencana Kegiatan dan Anggaran Bank serta pengkajian ulang tahunan atas rencana jangka panjang Bank yang diajukan oleh Direksi; dan
5. Melakukan penelaahan atas informasi risiko dan manajemen risiko Bank dalam laporan-laporan yang akan dipublikasikan.

The Board of Commissioners established the Risk Monitoring Committee, Nomination and Remuneration Committee, and Audit Committee to support the effective execution of the Board of Commissioners' duties and responsibilities and ensure that the Bank's management is in accordance with GCG principles.

Risk Monitoring Committee

The Risk Monitoring Committee assists the Board of Commissioners in implementing GCG principles, particularly regarding risk management. The Risk Monitoring Committee oversees the continuous improvement process at the Bank, ensures the compliance with risk policies, procedures, and practices at all levels of organization, and ensures the implementation of an effective and controlled risk management.

Risk Monitoring Committee Charter

The implementation of the Risk Monitoring Committee's duties refers to the Risk Monitoring Committee Charter which were updated through Board of Commissioners' Decision No. 002/SK-KOM/12/23 dated 6 December 2023 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 the Risk Monitoring Committee are as follows:

1. Reviewing and providing 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;
2. Overseeing activities of the Risk Management Work Unit in monitoring the implementation of risk mitigation by related Work Units;
3. Overseeing the implementation of the Committee's recommendations by the Risk Management Work Unit;
4. Performing 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; and
5. Reviewing the Bank's risk information and Bank risk management in reports to be published.

Komposisi dan Masa Jabatan Komite Pemantau Risiko

Anggota Komite Pemantau Risiko Bank minimal berjumlah 3 (tiga) orang yang berasal dari Komisaris Independen dan pihak independen. Masa jabatan Komite Pemantau Risiko tidak boleh lebih lama dari masa jabatan Dewan Komisaris dan dapat dipilih kembali untuk 1 (satu) periode berikutnya.

Pada tahun 2023, jumlah dan komposisi Komite Pemantau Risiko Bank Victoria berdasarkan Keputusan Direksi No. 002B/SK-DIR/11/22 tanggal 9 November 2022 sebagai berikut:

Composition and Term of Office of the Risk Monitoring Committee

The Bank's Risk Monitoring Committee shall at least consist of 3 (three) members from Independent Commissioner and independent party. The term of office of the Risk Monitoring Committee can not be longer than the term of office of the Board of Commissioners and can be reelected for 1 (one) subsequent period.

In 2023, the number and composition of Bank Victoria's Risk Monitoring Committee based on Board of Directors' Decision Letter No. 002B/SK-DIR/11/22 dated 9 November 2022 were as follows:

Nama Name	Posisi di Komite Position in the Committee	Jabatan di Bank Position at the Bank	Keahlian Expertise
Gunawan Tenggarahardja	Ketua Chairperson	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	Perbankan Banking
Zaenal Abidin, Ph.D	Anggota Member	Komisaris Utama Independen Independent President Commissioner	Perbankan, Manajemen Risiko, dan GCG Banking, Risk Management, and GCG
Medi Sejati	Anggota Member	Pihak Independen Independent Party	Perbankan dan Audit Banking and Audit
Yozef Abdurachman	Anggota Member	Pihak Independen Independent Party	Manajemen Risiko dan Perbankan Risk Management and Banking

Profil Komite Pemantau Risiko

Risk Monitoring Committee's Profile

GUNAWAN TENGGARAHARDJA
Ketua Chairperson

ZAENAL ABIDIN, Ph.D
Anggota Member

Dasar Hukum Penunjukkan dan Periode Menjabat Dasar Pengangkatan

Basis of Appointment and Term of Office

Keputusan Direksi No. 002B/SK-DIR/11/22 tanggal 9 November 2022 (2022-Sekarang).

Board of Directors' Decision No. 002B/SK-DIR/11/22 dated 9 November 2022 (2022-Now).

Profil dapat dilihat pada profil Dewan Komisaris.

Profile can be seen in the Board of Commissioners' profile chapter.

MEDI SEJATI

Anggota
Member



Kewarganegaraan
Nationality
Indonesia / Indonesian



Tempat Lahir
Place of Birth
Jakarta



Usia
Age
58 tahun / years old



Domisili
Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat

Keputusan Direksi No. 002B/SK-DIR/11/22 tanggal 9 November 2022 (2022-Sekarang).

Riwayat Pendidikan

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

Rangkap Jabatan**Di dalam Bank Victoria:**

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

Di luar Bank Victoria:

Tidak ada.

Riwayat Jabatan

- Kolektor PT Jasa Marga (1984–1986);
- *Teller* Bank Swadesi (1990-1991);
- Menjabat di Bank Intan (1991-1999) sebagai:
 - a. Sekretaris Kepala Biro Kredit;
 - b. *Internal Control Officer*;
 - c. Kepala Bagian Audit Kredit dan *Marketing*;
 - d. Kepala Bagian Kredit *Support*;
- Auditor Kantor Akuntan Publik Edi Kaslim & Kantor Akuntan Publik Gatot Permadi Djuwono (1999–2002);
- Kepala Bagian Akunting Bank Harmoni (2002–2007);
- Kepala Bagian Akunting Bank Index Selindo (2007–2008);
- Kepala Divisi Akunting Bank Swaguna (2008–2010);
- Kepala Divisi Akunting Bank Victoria Syariah (2010-2014);
- Akunting *Officer* PT Bank Victoria International Tbk (2014);
- Kepala Bagian Sentral Operasional PT Bank Victoria Syariah (2014);
- Kepala Bagian *Support* Pembiayaan PT Bank Victoria Syariah (2015);
- Kepala Divisi Manajemen Risiko dan Kepatuhan PT Bank Victoria Syariah (2015-2016);
- Kepala Divisi Kepatuhan dan Sekretaris Perusahaan PT Bank Victoria Syariah (2017-2019);
- Kepala Divisi Kepatuhan PT Bank Victoria Syariah (2019-2020);
- Anggota Komite Audit PT Victoria Alife Indonesia (2021); dan
- Anggota Komite Pemantau Risiko PT Victoria Alife Indonesia (2021).

Sertifikasi

- Sertifikasi Manajemen Risiko Level 1 dari Badan Sertifikasi Manajemen Risiko (2007);
- Sertifikasi Manajemen Risiko Level 2 dari Badan Sertifikasi Manajemen Risiko (2011);
- Sertifikasi Kepatuhan Level 1 dari Lembaga Sertifikasi Profesi Perbankan (2017);
- Sertifikasi Manajemen Risiko Level 3 dari Badan Sertifikasi Manajemen Risiko (2018);
- Sertifikasi Kepatuhan Level 2 dari Lembaga Sertifikasi Profesi Perbankan (2018); dan
- *Certification in Audit Committee Practices (CACP) Batch XXIII* dari Ikatan Komite Audit Indonesia (2023).

Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

Basis of Appointment and Term of Office

Board of Directors' Decision No. 002B/SK-DIR/11/22 dated 9 November 2022 (2022-Now).

Education

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

Concurrent Positions**In Bank Victoria:**

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

Outside of Bank Victoria:

None.

History of Positions

- Collector of PT Jasa Marga (1984–1986);
- Teller of Bank Swadesi (1990-1991);
- Held positions at Bank Intan (1991-1999) as:
 - a. Secretary of Credit Bureau Head;
 - b. Internal Control Officer;
 - c. Credit and Marketing Audit Department Head;
 - d. Credit Support Department Head;
- Auditor of Edi Kaslim Public Accounting Firm & Gatot Permadi Djuwono Public Accounting Firm (1999–2002);
- Head of Accounting Department of Bank Harmoni (2002–2007);
- Head of Accounting Department of Bank Index Selindo (2007–2008);
- Accounting Division Head of Bank Swaguna (2008-2010);
- Accounting Division Head of PT Bank Victoria Syariah (2010-2014);
- Accounting Officer of PT Bank Victoria International Tbk (2014);
- Central Operational Department Head of PT Bank Victoria Syariah (2014);
- Financing Support Department Head of PT Bank Victoria Syariah (2015);
- Risk Management and Compliance Division Head of PT Bank Victoria Syariah (2015-2016);
- Compliance Division Head and Corporate Secretary of PT Bank Victoria Syariah (2017-2019);
- Compliance Division Head of PT Bank Victoria Syariah (2019-2020);
- Member of Audit Committee of PT Victoria Alife Indonesia (2021); and
- Member of Risk Monitoring Committee of PT Victoria Alife Indonesia (2021).

Certification


- Risk Management Certification Level 1 from the Risk Management Certification Institution (2007);
- Risk Management Certification Level 2 from the Risk Management Certification Institution (2011);
- Compliance Certification Level 1 from the Banking Professional Certification Institute (2017);
- Risk Management Certification Level 3 from the Risk Management Certification (2018);
- Compliance Certification Level 2 from the Banking Professional Certification Institute (2018); and
- Certification in Audit Committee Practices (CACP) Batch XXIII from Indonesian Institute of Audit Committee (2023)


Affiliation Relationship


Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

**YOZEF
ABDULRACHMAN**

**Anggota
Member**

 **Kewarganegaraan**
Nationality
Indonesia / Indonesian

 **Tempat Lahir**
Place of Birth
Tasikmalaya

 **Usia**
Age
66 tahun / years old

 **Domisili**
Domicile
Tangerang

Dasar Pengangkatan dan Periode Menjabat

Keputusan Direksi No. 002B/SK-DIR/11/22 tanggal 9 November 2022 (2022-Sekarang).

Riwayat Pendidikan

Sarjana Matematika dari Universitas Padjadjaran (1983).

Rangkap Jabatan

Di dalam Bank Victoria:

- Anggota Komite Audit (sejak 2019).

Di luar Bank Victoria:

- Konsultan dan *Trainer*/Fasilitator bidang Manajemen Risiko (sejak 2010); dan
- *Trainer* dan Fasilitator Pembekalan Sertifikasi Manajemen Risiko dan *Surveillance/Refreshment* Manajemen Risiko (sejak 2010);

Riwayat Jabatan

- Menjabat di PT Bank Dagang Negara sebagai:
 - › *Officer Development Program* (1985-1986);
 - › *System and Procedure Department Staff – Electronic Data Processing Desk* (1986-1987);
 - › *Technical Support Department Staff - Electronic Data Processing Desk* (1988-1989);
 - › *Setup MIDAS Application System*, Los Angeles Agency, Los Angeles, USA (1989);
 - › *Programmer III - Electronic Data Processing Desk* (1989-1990);
 - › Kepala Seksi Pengembangan Sistem Aplikasi – Divisi Informasi Teknologi (1991-1994);
 - › Kepala Bagian Operasi Komputer - Divisi Informasi Teknologi (1995-1996); dan
 - › Kepala Bagian Dukungan Pengguna – Divisi Informasi Teknologi (1997-1998).
- Menjabat di PT Bank Mandiri Tbk sebagai:
 - › *Project Manager Y2K (Legacy PT Bank Dagang Negara)* (1999);
 - › *Group Head, Branch IT Deployment – IT Retail Banking Services Delivery Division* (1999-2000);
 - › *Integrasi Sistem Aplikasi Core Banking* (implementasi 600 cabang) (1999-2000);
 - › *Senior Manager of Operational Risk Management Review – Operational Risk Department – Portfolio and Operational Risk Management Group* (2001-2004);
 - › *Team Leader of Business Line II – Operational Risk Department – Portfolio and Operational Risk Management Group* (2005-2006);
 - › *Trainer Implementation and Workshop* Manajemen Risiko Operasional kepada ORM Koordinator Kantor Wilayah, Kantor Pusat, dan Kantor Cabang Timor Leste (2006-2010);
 - › *Team Leader of Policy – Operational Risk Department – Market and Operational Risk Group* (2007-2008); dan
 - › *Team Leader of MIS – Operational Risk Department – Market and Operational Risk Group* (2009-2010).
- Konsultan Manajemen Risiko Operasional PT Bank Agro Tbk (2011);
- Konsultan Manajemen Risiko Operasional PT Bank Mutiara Tbk (2013);
- Konsultan *Mapping* dan Pengukuran Eksposur *Corporate Loans Portfolio* PT Perusahaan Gas Negara Tbk (2014);
- Konsultan PT Bank Perkreditan Rakyat Sumber Artha Waru Agung, Sidoarjo (2018); dan
- Anggota Komite Tata Kelola Terintegrasi Bank Victoria (2019).

Basis of Appointment and Term of Office

Board of Directors' Decision No. 002B/SK-DIR/11/22 dated 9 November 2022 (2022-Now).

Education

Bachelor of Mathematics from Padjajaran University (1983).

Concurrent Positions

In Bank Victoria:

- Member of Audit Committee (since 2019).

Outside of Bank Victoria:

- Consultant and Trainer/Facilitator of Risk Management sector (since 2010); and
- Trainer and Facilitator for Briefing of Risk Management Certification and Risk Management Surveillance/Refreshment (since 2010);

History of Position

- Held positions at PT Bank Dagang Negara as:
 - › *Officer Development Program* (1985-1986);
 - › *System and Procedure Department Staff – Electronic Data Processing Desk* (1986-1987);
 - › *Technical Support Department Staff - Electronic Data Processing Desk* (1988-1989);
 - › *MIDAS Application System Setup*, Los Angeles Agency, Los Angeles, USA (1989);
 - › *Programmer III - Electronic Data Processing Desk* (1989-1990);
 - › *Head of Application System Development Section – Information Technology Division* (1991-1994);
 - › *Head of Computer Operations Division – Information Technology Division* (1995-1996); and
 - › *Head of User Support Section – Information Technology Division* (1997-1998).
- Held positions at PT Bank Mandiri Tbk as:
 - › *Y2K Project Manager (Legacy of PT Bank Dagang Negara)* (1999);
 - › *Group Head, IT Deployment Branch – IT Retail Banking Services Delivery Division* (1999-2000);
 - › *Core Banking Application System Integration* (implementation in 600 branches) (1999-2000);
 - › *Senior Manager of Operational Risk Management Review – Operational Risk Department – Portfolio and Operational Risk Management Group* (2001-2004);
 - › *Team Leader of Business Line II – Operational Risk Department – Portfolio and Operational Risk Management Group* (2005-2006);
 - › *Trainer of Implementation and Workshop* on Operational Risk Management to ORM Coordinators for Regional Offices, Head Office, and Branch Offices of Timor Leste (2006-2010);
 - › *Team Leader of Policy – Operational Risk Department – Market and Operational Risk Group* (2007-2008); and
 - › *Team Leader of MIS – Operational Risk Department – Market and Operational Risk Group* (2009-2010).
- Operational Risk Management Consultant of PT Bank Agro Tbk (2011);
- Operational Risk Management Consultant of PT Bank Mutiara Tbk (2013);
- Consultant for *Mapping* and Corporate Loans Portfolio Exposure Measurement of PT Perusahaan Gas Negara Tbk (2014);
- Consultant of PT Bank Perkreditan Rakyat Sumber Artha Waru Agung, Sidoarjo (2018); and
- Member of the Integrated Governance Committee of Bank Victoria (2019).

Sertifikasi

- Manajemen Umum Perbankan dari Lembaga Pengembangan Perbankan Indonesia (1990);
- Kursus Pimpinan Cabang dari Lembaga Pengembangan Perbankan Indonesia (1996);
- BASE-24 dari Applied Communications Inc. (ACI), Nebrashka, USA (1996);
- *Public Speaking and Business Presentation* dari Tantowi Yahya Public Speaking School (2006);
- *Project Management Workshop* ABN Amro (2006);
- *Effective Interview Technique* Bagus Brain Communication (2006);
- *Training Design Delivery Risk Management Academy* dari PT Bank Mandiri Tbk (2009);
- *Training for Trainers Risk Management Certification* Level 2 dari Bankers Association for Risk Management (2010);
- *Risk Management Certification Refreshment* Program dari Bankers Association for Risk Management (2015);
- *Risk Management Certification Refreshment* Program dari Lembaga Pengembangan Perbankan Indonesia (2020);
- Sertifikasi Manajemen Risiko Level 2 dari Badan Sertifikasi Manajemen Risiko (2020);
- Pelatihan Dasar-Dasar Perbankan Syariah dari Karim Consulting Indonesia (2022); dan
- *Training Methodology Instructor* Kerangka Kualifikasi Nasional Indonesia Level 4 dari Badan Nasional Sertifikasi Profesi, Lembaga Sertifikasi Profesi-Instruktur Kompeten Indonesia (2023).

Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

Certification

- Banking General Management from Indonesian Banking Development Institute (1990);
- Branch Management Course from Indonesian Banking Development Institute (1996);
- BASE-24 Applied Communications Inc. (ACI), Nebraska, USA (1996);
- Public Speaking and Business Presentation from Tantowi Yahya Public Speaking School (2006);
- Project Management Workshop, ABN Amro (2006);
- Effective Interview Technique, Bagus Brain Communication (2006);
- Training Design Delivery Risk Management Academy from PT Bank Mandiri Tbk (2009);
- Training for Trainers Risk Management Certification Level 2 from Bankers Association for Risk Management (2010);
- Risk Management Certification Refreshment Program, Bankers Association for Risk Management (2015);
- Risk Management Certification Refreshment Program, Bankers Association for Risk Management (2020);
- Risk Management Certification Level 2 from the Risk Management Certification Institution (2020);
- Training on the Basics of Sharia Banking by Karim Consulting Indonesia (2022); and
- Training Methodology Instructor, Indonesia National Qualification Framework Level 4 from National Professional Certification Agency, Profession Certification Institute-Indonesia Competent Instructor (2023).

Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

Independensi Komite Pemantau Risiko

Komite Pemantau Risiko Bank telah memenuhi aspek independensi berikut:

1. Tidak memiliki hubungan keuangan dengan Dewan Komisaris, Direksi, serta Pemegang Saham Utama dan Pengendali;
2. Tidak memiliki hubungan kepemilikan saham di Bank, baik secara langsung maupun tidak langsung;
3. Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, maupun perusahaan afiliasi;
4. Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, Pemegang Saham Utama dan Pengendali, dan/atau sesama anggota Komite Pemantau Risiko; dan
5. Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.

Rapat Komite Pemantau Risiko

Komite Pemantau Risiko minimal melaksanakan 6 (enam) kali rapat dalam 11 (sebelas) per tahun. Rapat dapat diselenggarakan apabila dihadiri minimal 51% dari jumlah anggota termasuk seorang Komisaris Independen dan pihak independen.

Frekuensi kehadiran Komite Pemantau Risiko dalam rapat selama tahun 2023 ditunjukkan sebagai berikut:

Independency of Risk Monitoring Committee

The Bank's Risk Monitoring Committee has fulfilled the following independency aspects:

1. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders;
2. Does not have share ownership relationship in the Bank, either directly or indirectly;
3. Does not have management relationship in the Bank, Subsidiary, and affiliated company;
4. 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; and
5. Does not hold position as administrator of political party, state, and government.

Risk Monitoring Committee's Meetinging

The Risk Monitoring Committee shall hold at least 6 (six) meetings in 11 (eleven) year. A meeting can be held if attended by at least 51% of the total members, including an Independent Commissioner and independent party.

The frequency of attendance of the Risk Monitoring Committee at meetings throughout 2023 is shown as follows:

Nama Name	Jabatan Position	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran (%) Attendance Rate (%)
Gunawan Tenggarahardja	Ketua Chairperson	11	11	100.00
Zaenal Abidin, Ph.D	Anggota Member	11	11	100.00
Medi Sejati	Anggota Member	11	11	100.00
Yozef Abdurachman	Anggota Member	11	11	100.00

Agenda Rapat Komite Pemantau Risiko

Agenda yang dibahas dalam rapat Komite Pemantau Risiko khususnya terkait Laporan Profil Risiko, Laporan Tingkat Kesehatan Bank berbasis Risiko (RBBR), kebijakan manajemen risiko, *risk management framework*, Laporan Direktur Kepatuhan, dan *risk register risk taking unit*.

Laporan Singkat Pelaksanaan Kegiatan Komite Pemantau Risiko Tahun 2023

Selain menyelenggarakan rapat secara berkala, Komite Pemantau Risiko telah berhasil menjalankan program-program komite melalui serangkaian kegiatan sebagai berikut:

1. Menyampaikan Laporan Tahunan Komite Pemantau Risiko di tahun 2022;
2. Melakukan penelaahan Laporan Kepatuhan;
3. Menyampaikan rencana kerja Komite Pemantau Risiko tahun 2024;
4. Melakukan penelaahan Laporan Profil Risiko Triwulanan;
5. Melakukan penelaahan Laporan Tingkat Kesehatan Bank Berbasis Risiko;
6. Menelaah Piagam Komite Pemantau Risiko; dan
7. Menelaah Laporan Direktur Kepatuhan.

Pelatihan dan/atau Peningkatan Komite Pemantau Risiko

Selama tahun 2023, Komite Pemantau Risiko telah mengikuti pelatihan dan/atau peningkatan kompetensi sebagai berikut:

Meeting Agenda Risk Management Activities

Agenda discussed at the Risk Monitoring Committee's meeting is specifically related to the Risk Profile Report, Risk-Based Bank Rating (RBBR) Report, risk management policies, risk management framework, Compliance Director Report, and risk register risk taking unit.

Brief Report on Implementation of Risk Monitoring Committee's Activities in 2023

In addition to holding regular meetings, the Risk Monitoring Committee has successfully implemented the committee programs through a series of the following activities:

1. Submitting the Risk Monitoring Committee Annual Report 2022;
2. Reviewing the Compliance Report;
3. Submitting the Risk Monitoring Committee Work Plan 2024;
4. Reviewing the Quarterly Risk Report;
5. Reviewing the Risk-Based Bank Rating Report;
6. Reviewing the Risk Monitoring Committee Charter; and
7. Reviewing the Compliance Director's Report.

Risk Monitoring Committee's Training and/or Development Programs

Throughout 2023, the Risk Monitoring Committee attended training and/or competency developments as follows:

Nama dan Jabatan Name and Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers
Gunawan Tenggarahardja Ketua Chairperson	Pelatihan dan/atau Peningkatan dapat dilihat pada bagian Pelatihan dan/atau Peningkatan Dewan Komisaris. Training and/or Development can be seen in the Board of Commissioners' Training and/or Development section.
Zaenal Abidin, Ph.D Anggota Member	

Nama dan Jabatan Name and Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers	
Medi Sejati Anggota Member	<ol style="list-style-type: none"> 1. Komite Audit (oleh Ikatan Komite Audit Indonesia); 2. Audit Internal (oleh Ikatan Komite Audit Indonesia); 3. Pengawasan terhadap Pengendalian Internal (oleh Ikatan Komite Audit Indonesia); 4. Pengawasan terhadap Audit Eksternal (oleh Ikatan Komite Audit Indonesia); 5. GCG dan <i>Compliance</i> (oleh Ikatan Komite Audit Indonesia); 6. Pengawasan Informasi Keuangan (oleh Ikatan Komite Audit Indonesia); dan 7. Manajemen Risiko (oleh Ikatan Komite Audit Indonesia). 	<ol style="list-style-type: none"> 1. Audit Committee (by Indonesian Institute of Audit Committee); 2. Internal Audit (by Indonesian Institute of Audit Committee); 3. Internal Control Supervision (by Indonesian Institute of Audit Committee); 4. External Audit Supervision (by Indonesian Institute of Audit Committee); 5. GCG and Compliance (by Indonesian Institute of Audit Committee); 6. Financial Information Supervision (by Indonesian Institute of Audit Committee); and 7. Risk Management (by Indonesian Institute of Audit Committee).
Yozef Abdurachman Anggota Member	<ol style="list-style-type: none"> 1. Menyusun Program Pelatihan Kerja (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 2. Merencanakan Penyajian Materi Pelatihan Kerja (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 3. Merencanakan Evaluasi Hasil Pembelajaran (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 4. Melaksanakan Pelatihan Tatap Muka (<i>Face to Face</i>) (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 5. Menerapkan Kesehatan dan Keselamatan Kerja (K3) di Lembaga Pelatihan Kerja (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 6. Mengelola Pemenuhan Persyaratan Bahasa, Literasi, dan Berhitung dalam Proses Pembelajaran (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 7. Menilai Kemajuan Kompetensi Peserta Pelatihan secara Individu (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 8. Menentukan Kebutuhan Pelatihan Individu (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 9. Merancang Strategi Pembelajaran (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 10. Mengelola Bahan Pelatihan Kerja (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 11. Mengelola Peralatan Pelatihan Kerja (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 12. Menyiapkan Pelaksanaan Pelatihan/Asesmen Berbasis Kompetensi (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 13. Melaksanakan Pelatihan Berbasis Kompetensi (PBK) (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); dan 14. Melakukan Asesmen Berbasis Kompetensi (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia). 	<ol style="list-style-type: none"> 1. Preparing Job Training Program (by Profession Certification Institute-Indonesia Competent Instructor); 2. Planning the Presentation of Job Training Material (Profession Certification Institute-Indonesia Competent Instructor); 3. Planning the Learning Outcomes Evaluation (by Profession Certification Institute-Indonesia Competent Instructor); 4. Conducting a Face to Face Training (by Profession Certification Institute-Indonesia Competent Instructor); 5. Implementing Occupational Health and Safety (OHS) in Job Training Institution (by Profession Certification Institute-Indonesia Competent Instructor); 6. Managing the Language, Literacy, and Numeracy Requirements in Learning Process (by Profession Certification Institute-Indonesia Competent Instructor); 7. Individually Assessing Competency Progress of Training Participants (by Profession Certification Institute-Indonesia Competent Instructor); 8. Determining Individual Needs of Training Participants (by Profession Certification Institute-Indonesia Competent Instructor); 9. Designing Learning Strategies (by Profession Certification Institute-Indonesia Competent Instructor); 10. Managing Job Training Materials (by Profession Certification Institute-Indonesia Competent Instructor); 11. Managing Job Training Equipment (by Profession Certification Institute-Indonesia Competent Instructor); 12. Preparing the Competency-Based Training/Assessment (by Profession Certification Institute-Indonesia Competent Instructor); 13. Conducting the Competency-Based Training (CBT) (by Profession Certification Institute-Indonesia Competent Instructor); and 14. Conducting the Competency-Based Assessment (by Profession Certification Institute

Komite Nominasi dan Remunerasi

Komite Nominasi dan Remunerasi membantu Dewan Komisaris dalam mengawasi kebijakan nominasi dan remunerasi untuk anggota Dewan Komisaris dan Direksi. Pembentukan komite juga bertujuan memastikan pelaksanaan tugas penerapan tata kelola Dewan Komisaris dan memenuhi persyaratan dari otoritas pengawas Bank.

Nomination and Remuneration Committee

The Nomination and Remuneration Committee assists the Board of Commissioners in overseeing nomination and remuneration policies for members of the Board of Commissioners and Board of Directors. The committee establishment also aims to ensure the implementation of the Board of Commissioners' governance duties and fulfill the requirements of the Bank's supervisory authority.

Pedoman Komite Nominasi dan Remunerasi

Pelaksanaan tugas Komite Nominasi dan Remunerasi mengacu pada Pedoman Kerja Komite Nominasi dan Remunerasi yang dimutakhirkan melalui Keputusan Dewan Komisaris No. 003/SK-KOM/09/18 tanggal 20 September 2018 tentang Pedoman Komite Nominasi dan Remunerasi PT Bank Victoria International Tbk.

Tugas dan Tanggung Jawab Komite Nominasi dan Remunerasi

Tugas dan tanggung jawab Komite Nominasi dan Remunerasi sebagai berikut:

1. Kebijakan Nominasi:
 - a. Menyusun dan merekomendasikan sistem dan prosedur pemilihan atau penggantian anggota Dewan Komisaris dan Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS;
 - b. Memberikan rekomendasi tentang calon anggota Dewan Komisaris dan/atau Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS;
 - c. Memberikan rekomendasi kepada Dewan Komisaris mengenai pihak independen yang akan menjadi anggota Komite Audit serta anggota Komite Pemantau Risiko; dan
 - d. Menyusun mekanisme dan melakukan penilaian kinerja Direksi dan Dewan Komisaris.
2. Kebijakan Remunerasi:
 - a. Menyusun dan mengevaluasi remunerasi untuk anggota Dewan Komisaris, Direksi, dan Pejabat Eksekutif hingga 1 (satu) tingkat di bawah Direksi;
 - b. Memberikan rekomendasi kepada Dewan Komisaris mengenai kebijakan remunerasi untuk Dewan Komisaris dan Direksi yang akan disampaikan kepada RUPS, serta kebijakan remunerasi untuk Pejabat Eksekutif hingga 1 (satu) tingkat di bawah Direksi yang akan disampaikan kepada Direksi; dan
 - c. Dalam pelaksanaan tugas remunerasi, memperhatikan kinerja keuangan, pemenuhan cadangan sesuai peraturan perundang-undangan, prestasi kerja individu, kewajaran dengan *peer group*, dan pertimbangan terhadap sasaran dan strategi jangka panjang Bank.
3. Tugas Lainnya:
 - a. Membantu Dewan Komisaris dalam memberikan rekomendasi tentang jumlah anggota Dewan Komisaris dan Direksi; dan
 - b. Membantu Direksi dalam mengevaluasi sistem *Human Capital Management & General Affair*, serta kebijakan pengembangan sumber daya manusia, termasuk rekrutmen, asesmen, peningkatan kompetensi, evaluasi, promosi, demosi, terminasi, suksesi, seleksi, dan tugas lainnya.

Nomination and Remuneration Committee Charter

The implementation of the Nomination and Remuneration Committee's duties refers to the Nomination and Remuneration Committee Charter which were updated through Board of Commissioners' Decision No. 003/SK-KOM/09/18 dated 20 September 2018 on Guidelines of Nomination and Remuneration Committee of PT Bank Victoria International Tbk.

Duties and Responsibilities of Nomination and Remuneration Committee

Duties and responsibilities of the Nomination and Remuneration Committee are as follows:

1. Nomination Policy:
 - a. To prepare and recommend system and procedure of selection or replacement of members of Board of Commissioners and Board of Directors to the Board of Commissioners to be proposed to the GMS;
 - b. To give recommendations about the candidates for the Board of Commissioners and/or Board of Directors to the Board of Commissioners to be proposed to the GMS;
 - c. To give recommendations to the Board of Commissioners on independent party who will become member of Audit Committee and member of Risk Monitoring Committee; and
 - d. To develop mechanisms and assess the performance of the Board of Directors and Board of Commissioners.
2. Remuneration Policy:
 - a. To prepare and evaluate remuneration for members of the Board of Commissioners, Board of Directors, and Executive Officers up to 1 (one) level below the Board of Directors;
 - b. To give recommendations to the Board of Commissioners on remuneration policy for the Board of Commissioners and Board of Directors to be proposed to the GMS, and remuneration policy for Executive Officers up to 1 (one) level below the Board of Directors to be proposed to the Board of Directors; and
 - c. In performing remuneration duty, consider financial performance, fulfillment of reserve in accordance with laws and regulations, individual work achievement, fairness with peer group, and consideration of the Bank's long-term goals and strategies.
3. Other Duties:
 - a. To assist the Board of Commissioners in giving recommendations about the number of members of the Board of Commissioners and Board of Directors; and
 - b. To assist the Board of Directors in evaluating the Human Capital Management & General Affair system, and human capital development policy, including recruitment, assessment, competency development, evaluation, promotion, demotion, termination, succession, selection, and other duties.

Komposisi dan Masa Jabatan Komite Nominasi dan Remunerasi

Anggota Komite Nominasi dan Remunerasi Bank minimal terdiri dari seorang Komisaris Independen, seorang Komisaris, dan seorang Pejabat Eksekutif yang membawahi Divisi *Human Capital Management*. Masa jabatan Komite Nominasi dan Remunerasi tidak boleh lebih lama dari masa jabatan Dewan Komisaris dan dapat dipilih kembali untuk periode berikutnya.

Pada tahun 2023, jumlah dan komposisi Komite Nominasi dan Remunerasi Bank Victoria berdasarkan Keputusan Direksi No. 002C/DIR-EKS/11/22 tanggal 9 November 2022, sebagai berikut:

Composition and Term of Office of the Nomination and Remuneration Committee

Members of the Bank's Nomination and Remuneration Committee consist of at least one Independent Commissioner, one Commissioner, and an Executive Officer in charge of the Human Capital Management Division. The term of office of the Nomination and Remuneration Committee cannot be longer than the term of office of the Board of Commissioners and can be re-elected for the next period.

In 2023, the number and composition of Bank Victoria's Nomination and Remuneration Committee were based on Board of Directors' Decision Letter No. 002C/DIR-EKS/11/22 dated 9 November 2022, as follows:

Nama Name	Posisi di Komite Position in the Committee	Jabatan di Bank Position at the Bank	Keahlian Expertise
Gunawan Tenggarahardja	Ketua Chairperson	Komisaris/Komisaris Independen Commissioner/Independent Commissioner	Perbankan Banking
Sia Leng Ho	Anggota Member	Komisaris Commissioner	Bisnis Business
Syahda Candra	Anggota Member	Kepala Divisi <i>Human Capital Management & General Affair</i> Head of Human Capital Management & General Affair Division	<i>Human Capital</i>

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

GUNAWAN TENGGARAHARDJA
Ketua Chairperson

SIA LENG HO
Anggota Member

Dasar Hukum Penunjukkan dan Periode Menjabat Dasar Pengangkatan

Basis of Appointment and Term of Office

Keputusan Direksi No. 002C/DIR-EKS/11/22 tanggal 9 November 2022 (2022-Sekarang).


Board of Directors' Decision No. 002C/DIR-EKS/11/22 dated 9 November 2022 (2022-Now).

Profil dapat dilihat pada profil Dewan Komisaris.


Profile can be seen in the Board of Commissioners' profile chapter.

SYAHDA CANDRA

Anggota
Member

 **Kewarganegaraan**
Nationality
Indonesia / Indonesian

 **Tempat Lahir**
Place of Birth
Jakarta

 **Usia**
Age
50 tahun / years old

 **Domisili**
Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Keputusan Direksi No. 002C/DIR-EKS/11/22 tanggal 9 November 2022 (2022-Sekarang).

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

Rangkap Jabatan
Di dalam Bank Victoria:
Kepala Divisi *Human Capital Management & General Affair* Bank Victoria (sejak 2019).

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan

- Senior Staff *Human Resource Department (Recruitment and Man Power)* PT Bank Ekonomi Rahardja (1997-2000);
- Assistant Manager *Human Resource Department* PT Hawaii Confectionery Factory (2001-2002);
- Supervisor *Human Resource Department* PT JS Multi Collection (2002-2003); dan
- Menjabat di Bank Victoria sebagai:
 - › Kepala Divisi *Human Resource and General Affair* (2003-2012);
 - › Kepala Divisi *Human Capital Management* (2012-2017); dan
- Kepala Divisi *Human Resource and General Affair* (2019).

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

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

Basis of Appointment and Term of Office
Board of Directors' Decision No. 002C/DIR-EKS/11/22 dated 9 November 2022 (2022-Now).

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

Concurrent Positions
In Bank Victoria:
Head of Human Capital Management & General Affair Division of Bank Victoria (since 2019).

Outside of Bank Victoria:
None.

History of Position

- Senior Staff of Human Resource Department (Recruitment and Manpower) of PT Bank Ekonomi Rahardja (1997-2000);
- Assistant Manager of Human Resource Department of PT Hawaii Confectionery Factory (2001-2002);
- Supervisor of Human Resource Department of PT JS Multi Collection (2002-2003); and
- Held positions at Bank Victoria as:
 - a. Head of Human Resources and General Affair Division (2003-2012);
 - b. Head of Human Capital Management Division (2012-2017); and
- Head of Human Resources and General Affair Division (2019).

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

Affiliation Relationship
Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

Independensi Komite Nominasi dan Remunerasi

Komite Nominasi dan Remunerasi Bank telah memenuhi aspek independensi berikut:

1. Tidak memiliki hubungan keuangan dengan Dewan Komisaris, Direksi, serta Pemegang Saham Utama dan Pengendali;
2. Tidak memiliki hubungan kepemilikan saham di Bank, baik secara langsung maupun tidak langsung;
3. Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, maupun perusahaan afiliasi;
4. Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, Pemegang Saham Utama dan Pengendali, dan/atau sesama anggota Komite Nominasi dan Remunerasi; dan
5. Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.

Rapat Komite Nominasi dan Remunerasi

Komite Nominasi dan Remunerasi minimal melaksanakan 4 (empat) kali rapat dalam 1 (satu) tahun. Rapat dapat diselenggarakan apabila dihadiri minimal 51% dari jumlah anggota termasuk seorang Komisaris Independen dan Pejabat Eksekutif. Frekuensi kehadiran Komite Nominasi dan Remunerasi

Independency of Nomination and Remuneration Committee

The Bank's Nomination and Remuneration Committee has fulfilled the following independency aspects:

1. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders;
2. Does not have share ownership relationship in the Bank, either directly or indirectly;
3. Does not have management relationship in the Bank, Subsidiary, and affiliated company;
4. 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; and
5. Does not hold position as administrator of political party, state, and government.

Nomination and Remuneration Committee's Meeting

The Nomination and Remuneration Committee shall hold at least 4 (four) meetings in 1 (one) year. A meeting can be held if attended by at least 51% of the total members, including an Independent Commissioner and Executive Officer. The frequency of attendance of the Nomination and Remuneration Committee

dalam rapat selama tahun 2023 ditunjukkan sebagai berikut:

at meetings throughout 2023 is shown as follows:

Nama Name	Jabatan Position	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran (%) Attendance Rate (%)
Gunawan Tenggarahardja	Ketua Chairperson	7	7	100.00
Sia Leng Ho	Anggota Member	7	7	100.00
Syahda Candra	Anggota Member	7	7	100.00

Agenda Rapat Komite Nominasi dan Remunerasi

Agenda yang dibahas dalam rapat Komite Nominasi dan Remunerasi khususnya terkait penerimaan *Advisor of Finance and Accounting*; evaluasi tunjangan operasional; Kebijakan Pedoman Gratifikasi/Bonus Tahun 2022-2023 bagi pengurus dan pegawai Bank untuk direkomendasikan kepada Dewan Komisaris; rekomendasi Direktur Operasional & IT; rekomendasi tunjangan akhir tahun bagi pengurus dan pegawai; rekomendasi *SEVP of Finance, Accounting & MIS*; dan evaluasi komposisi Direksi dan Pejabat Eksekutif.

Laporan Singkat Pelaksanaan Kegiatan Komite Nominasi dan Remunerasi Tahun 2023

Selain menyelenggarakan rapat secara berkala, Komite Nominasi dan Remunerasi telah berhasil menjalankan program-program komite melalui serangkaian kegiatan sebagai berikut:

- Melakukan penerimaan *Advisor of Finance and Accounting*;
- Mengevaluasi tunjangan operasional bagi Direksi dan SEVP;
- Menelaah Kebijakan Pedoman Gratifikasi/Bonus Tahun 2022-2023 bagi pengurus dan pegawai Bank untuk direkomendasikan kepada Dewan Komisaris;
- Memberikan rekomendasi Direktur Operasional & IT;
- Memberikan rekomendasi tunjangan akhir tahun bagi pengurus dan pegawai; dan
- Memberikan rekomendasi *SEVP of Finance, Accounting & MIS*.

Pelatihan dan/atau Peningkatan Komite Nominasi dan Remunerasi

Selama tahun 2023, Komite Nominasi dan Remunerasi telah mengikuti pelatihan dan/atau peningkatan kompetensi sebagai berikut:

Nama dan Jabatan Name and Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers
Gunawan Tenggarahardja Ketua Chairperson	Pelatihan dan/atau Peningkatan dapat dilihat pada bagian Pelatihan dan/atau Peningkatan Dewan Komisaris. Training and/or Development can be seen in the Board of Commissioners' Training and/or Development section.
Sia Leng Ho Anggota Member	

Nomination and Remuneration Committee's Meeting Agenda

Agenda discussed at the Nomination and Remuneration Committee's meeting is specifically related to the acceptance of *Advisor of Finance & Accounting*; operational allowances evaluation; 2022-2023 Gratification/Bonus Guidelines policy for Bank's management and employees to be recommended to the Board of Commissioners; recommendation for Director of Operations & IT; year-end allowances recommendation for management and employees; recommendation for SEVP of Finance, Accounting & MIS; and the evaluation of composition of the Board of Directors and Executive Officers.

Brief Report on Implementation of Nomination and Remuneration Committee's Activities in 2023

In addition to holding regular meetings, the Nomination and Remuneration has managed to implemented the committee's programs as follows:

- Conducting acceptance of *Advisor of Finance and Accounting*;
- Evaluating the operational allowances for the Board of Directors and SEVP;
- Reviewing the 2022-2023 Gratification/Bonus Guidelines policy for Bank's management and employees to be recommended to the Board of Commissioners;
- Providing recommendation for Director of Operations & IT;
- Providing year-end allowances recommendation for management and employees; and
- Providing recommendation for SEVP of Finance, Accounting & MIS.

Nomination and Remuneration Committee's Training and/or Development Programs

Throughout 2023, the Nomination and Remuneration Committee attended training and/or competency developments as follows:

Nama dan Jabatan Name and Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers	
Syahda Candra Anggota Member	<ol style="list-style-type: none"> 1. <i>Outlook</i> Industri Jasa Keuangan di Tahun 2023 (oleh Otoritas Jasa Keuangan Institute); 2. <i>Tren</i> Perbankan di Tahun 2023 (oleh Otoritas Jasa Keuangan Institute); 3. <i>Team Building</i> dan <i>Outbond: Together We Growth</i> (oleh Otoritas Jasa Keuangan Institute); 4. <i>Philosophy that Flows in My Soul</i> (oleh Bank Victoria); 5. <i>Governance, Risk, and Compliance</i> (oleh Bank Victoria); 6. <i>Lesson Learned</i> Kasus Silicon Valley Bank (oleh Lembaga Pengembangan Perbankan Indonesia); 7. ISO 27001 - Sistem Manajemen Keamanan Informasi (oleh Veda Praxis); 8. <i>Refreshment</i> Sertifikasi Manajemen Risiko: <i>Risk in Digital World</i> (oleh PT Efektifpro Knowledge Source); 9. <i>Expert Sharing Outlook Banking Regulation</i> (oleh Lembaga Pengembangan Perbankan Indonesia); 10. Aspek Hukum dan Dokumen Pembukaan Rekening Perusahaan (oleh Bank Victoria); 11. <i>Anti Fraud Management for Leaders Batch 2</i> (oleh PT Kanatta Daya Indonesia); 12. <i>Refreshment</i> Pencegahan Tindak Pidana Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana); 13. <i>Expert Sharing Session - Keuangan Berkelanjutan</i> (oleh Otoritas Jasa Keuangan Institute); 14. <i>Mastering Yourself: Optimalkan Potensi dan Tingkatkan Kinerja di Era Digital Confirmation</i> (oleh Otoritas Jasa Keuangan Institute); dan 15. <i>OJK's Year-End Knowledge Sharing Session</i> (oleh Otoritas Jasa Keuangan Institute). 	<ol style="list-style-type: none"> 1. 2023 Financial Services Industry (by Otoritas Jasa Keuangan Institute); 2. 2023 Banking Trends (by Otoritas Jasa Keuangan Institute); 3. Team Building dan Outbond: Together We Growth (by Otoritas Jasa Keuangan Institute); 4. Philosophy that Flows in My Soul (by Bank Victoria); 5. Governance, Risk, and Compliance (by Bank Victoria); 6. Lesson Learned from the Case of Silicon Valley Bank (by Indonesian Banking Development Institution); 7. ISO 27001 – Information Security Management System (by Veda Praxis); 8. Risk Management Certification Refreshment: Risk in Digital World (by PT Efektifpro Knowledge Source); 9. Expert Sharing Outlook Banking Regulation (by Indonesian Banking Development Institution); 10. Legal Aspect and Documents for Opening a Corporate Account (by Bank Victoria); 11. Anti-Fraud Management for Leaders Batch 2 (by PT Kanatta Daya Indonesia); 12. Refreshment on Prevention of Criminal Acts of Anti Money Laundering, Counter Terrorism Financing, and Prevention of Funding for Proliferation of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana); 13. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 14. Mastering Yourself: Optimizing Potentials and Improving Performances in the Digital Confirmation Era (by Otoritas Jasa Keuangan Institute); and 15. OJK's Year-End Knowledge Sharing Session (by Otoritas Jasa Keuangan Institute).

Komite Audit

Komite Audit dibentuk untuk mendukung Dewan Komisaris dalam melakukan pengawasan yang efektif dan independen terhadap pencatatan keuangan, manajemen risiko, pengendalian internal, serta memantau kepatuhan terhadap peraturan dan undang-undang yang berlaku.

Pedoman Komite Audit

Pelaksanaan tugas Komite Audit mengacu pada Piagam Komite Audit yang dimutakhirkan melalui Keputusan Dewan Komisaris No. 001/SK-KOM/12/23 tanggal 6 Desember 2023 tentang Piagam dan Pedoman Kerja Komite Audit PT Bank Victoria International Tbk.

Tugas dan Tanggung Jawab Komite Audit

Tugas dan tanggung jawab Komite Audit sebagai berikut:

1. Melakukan penelaahan dan klarifikasi atas informasi keuangan yang akan dikeluarkan kepada publik dan/atau pihak otoritas;
2. Melakukan seleksi, penunjukan, dan pengawasan pekerjaan auditor independen;
3. Mengevaluasi efektivitas pelaksanaan pekerjaan auditor independen;
4. Melakukan seleksi, penunjukan, dan pengawasan pekerjaan Auditor Independen terkait kinerja SKAI & Anti *Fraud* 3 (tiga) tahunan;
5. Mengevaluasi efektivitas pelaksanaan fungsi audit internal;

Audit Committee

The Audit Committee is established to assist the Board of Commissioners in performing effective and independent supervision of financial records, risk management, internal control, and monitoring compliance with the applicable laws and regulations.

Audit Committee Charter

The implementation of Audit Committee's duties is based on the Audit Committee Charter which was updated under the Board of Commissioners' Decision No. 001/SK-KOM/12/23 dated 6 December 2023 on the Charter and Work Guidelines of the Audit Committee of PT Bank Victoria International Tbk.

Duties and Responsibilities of Audit Committee

Duties and responsibilities of the Audit Committee are as follows:

1. Reviewing and clarifying the financial information to be issued to the public and/or authorities;
2. Selecting, appointing, and monitoring independent auditor's work;
3. Evaluating the effectiveness of implementation of independent auditor function;
4. Selecting, appointing, and monitoring Independent Auditor's work related to triennial SKAI & Anti-Fraud performances;
5. Evaluating the effectiveness of implementation of internal audit function;

6. Mengevaluasi efektivitas pengendalian internal;
7. Memastikan kegiatan operasi bank dijalankan dengan mematuhi peraturan perundang-undangan yang berlaku;
8. Melakukan koordinasi dengan Komite Manajemen Risiko dalam hal pemantauan risiko dan mitigasinya; dan
9. Melakukan penilaian sendiri terhadap efektivitas pelaksanaan tugas Komite Audit.

Komposisi dan Masa Jabatan Komite Audit

Anggota Komite Audit Bank minimal terdiri dari seorang Komisaris Independen sebagai Ketua dan 2 (dua) orang pihak independen dengan kompetensi dan kualifikasi di bidang keuangan, hukum, dan perbankan. Masa jabatan anggota Dewan Komisaris yang merangkap sebagai anggota Komite Audit sama dengan masa kerja penunjukannya sebagai anggota Dewan Komisaris yang ditentukan oleh RUPS. Sedangkan, masa jabatan anggota Komite Audit yang bukan merupakan anggota Dewan Komisaris tidak lebih lama dari masa jabatan Dewan Komisaris dengan tidak mengurangi hak Dewan Komisaris untuk memberhentikan sewaktu-waktu.

Pada tahun 2023, jumlah dan komposisi Komite Audit Bank Victoria berdasarkan Keputusan Direksi No. 002A/SK-DIR/11/22 tanggal 9 November 2022, sebagai berikut:

Nama Name	Posisi di Komite Position in the Committee	Jabatan di Bank Position at the Bank	Keahlian Expertise
Zaenal Abidin, Ph.D	Ketua Chairperson	Komisaris Utama Independen Independent President Commissioner	Perbankan, Manajemen Risiko, dan GCG Banking, Risk Management, and GCG
Medi Sejati	Anggota Member	Pihak Independen Independent Party	Perbankan dan Audit Banking and Audit
Yozef Abdulrachman	Anggota Member	Pihak Independen Independent Party	Manajemen Risiko dan Perbankan Risk Management and Banking

Ketua Komite Audit dijabat oleh Komisaris Utama Independen karena saat ini Bank memiliki 2 (dua) orang Komisaris Independen, di mana 1 (satu) orang Komisaris Independen sebagai Ketua Komite Audit (Peraturan Otoritas Jasa Keuangan No. 17 Pasal 64 ayat 4) dan 1 (satu) orang Komisaris Independen lainnya sebagai Ketua Komite Pemantau Risiko (Peraturan Otoritas Jasa Keuangan No. 17 Pasal 65 ayat 4). Meski demikian, Bank menjamin independensi Ketua Komite Audit dalam menjalankan tugas dan tanggung jawabnya sebagai Ketua Komite Audit.

Profil Komite Audit

Profil Ketua Komite Audit dapat dilihat pada profil Dewan Komisaris dan profil anggota Komite Audit dapat dilihat pada profil Komite Pemantau Risiko.

Independensi Komite Audit

Komite Audit Bank telah memenuhi aspek independensi berikut:

1. Tidak memiliki hubungan keuangan dengan Dewan Komisaris, Direksi, serta Pemegang Saham Utama dan Pengendali;

6. Evaluating the effectiveness of internal control;
7. Ensuring the bank's operational activities are carried out in compliance with the applicable laws and regulations;
8. Coordinating with the Risk Management Committee in risk monitoring and mitigation; and
9. Conducting self-assessment on the effectiveness of implementation of Audit Committee's duties.

Composition and Term of Office of the Audit Committee

The Audit Committee consists of at least one Independent Commissioner as Chairman and 2 (two) independent parties with competencies and qualifications in finance, legal, and banking. The term of office of Board of Commissioners' members who concurrently serve as member of Audit Committee are the same as the term of office of the appointment as the Board of Commissioners' members as determined by the GMS. Meanwhile, Audit Committee's members who are not Board of Commissioners' members have the term of office not longer than the Board of Commissioners' term of office, without prejudice to the Board of Commissioners' rights to dismiss them at any time.

In 2023, the number and composition of Bank Victoria's Audit Committee based on Board of Directors' Decision Letter No. 002A/SK-DIR/11/22 dated 9 November 2022, were as follows:

The Chairman of the Audit Committee is held by the Independent President Commissioner as currently the Bank has 2 (two) Independent Commissioners, where 1 (one) Independent Commissioner held the position as Chairman of the Audit Committee and the other held the position as Chairman of Risk Monitoring Committee (Financial Services Authority Regulation No. 17 Article 65 paragraph 4). However, the Bank guarantees the independence of the Audit Committee's Chairman in performing duties and responsibilities as Chairman of Audit Committee.

Audit Committee's Profile

Profile of Audit Committee's Chairman can be seen in the Board of Commissioners' profile, and Audit Committee members' profile can be seen in the Risk Monitoring Committee's profile.

Independency of the Audit Committee

The Bank's Audit Committee has fulfilled the following independency aspects:

1. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders;

2. Tidak memiliki hubungan kepemilikan saham di Bank, baik secara langsung maupun tidak langsung;
3. Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, maupun perusahaan afiliasi;
4. Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, Pemegang Saham Utama dan Pengendali, dan/atau sesama anggota Komite Audit; dan
5. Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.

Rapat Komite Audit

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023, Komite Audit minimal melaksanakan rapat 1 (satu) bulan sekali yang dipimpin langsung oleh Ketua Komite Audit. Rapat dapat diselenggarakan apabila dihadiri minimal 51% dari jumlah anggota termasuk seorang Komisaris Independen dan pihak independen. Frekuensi kehadiran Komite Audit dalam rapat selama tahun 2023 ditunjukkan sebagai berikut:

Nama Name	Jabatan Position	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran (%) Attendance Rate (%)
Zaenal Abidin, Ph.D	Ketua Chairperson	9	9	100.00
Medi Sejati	Anggota Member	9	9	100.00
Yozef Abdulrachman	Anggota Member	9	9	100.00

Agenda Rapat Komite Audit

Agenda yang dibahas dalam rapat Komite Audit khususnya terkait realisasi rencana kerja SKAI, *exit meeting* audit oleh kantor akuntan publik, evaluasi *risk register*, *kick off meeting* oleh kantor akuntan publik, dan penerapan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023.

Laporan Singkat Pelaksanaan Kegiatan Komite Audit Tahun 2023

Selain menyelenggarakan rapat secara berkala, Komite Audit telah berhasil menjalankan program-program komite melalui serangkaian kegiatan sebagai berikut:

1. Melakukan penelaahan dan pengkajian atas Laporan Keuangan Triwulanan;
2. Mengevaluasi realisasi penggunaan jasa audit atas informasi keuangan oleh kantor akuntan publik/akuntan publik;
3. Mengevaluasi efektivitas pelaksanaan fungsi internal audit (SKAI & Anti *Fraud*);
4. Menelaah efektivitas dan efisiensi pengendalian internal triwulanan;
5. Menelaah kepatuhan terhadap peraturan perundang-undangan;
6. Menyeleksi, menunjuk atau merekomendasikan, dan mengawasi pekerjaan Auditor Independen untuk jasa audit informasi keuangan tahunan;

2. Does not have share ownership relationship in the Bank, either directly or indirectly;
3. Does not have management relationship in the Bank, Subsidiary, and affiliated company;
4. Does not have family relationship with the Board of Commissioners, Board of Directors, Main and Controlling Shareholders, and/or among members of Audit Committee; and
5. Does not hold position as administrator of political party, state, and government.

Audit Committee's Meeting

Based on the Financial Services Authority Regulation No. 17 of 2023, the Audit Committee holds meeting at least once a month, chaired directly by the Chairman of Audit Committee. A meeting can be held if attended by at least 51% of the total members, including an Independent Commissioner and independent party. The frequency of attendance of the Audit Committee at meetings throughout 2023 is shown as follows:

Audit Committee's Meeting Agenda

Agenda discussed at the Audit Committee's meeting was specifically related to the realization of the SKAI work plan, audit exit meeting by the public accounting firm, risk register evaluation, kick off meeting by the public accounting firm, and implementation of Financial Services Authority Regulation No. 17 of 2023.

Brief Report on Implementation of Audit Committee's Activities in 2023

In addition to holding regular meetings, the Audit Committee managed to implement committee programs through a series of activities as follows:

1. Reviewing and studying the Quarterly Financial Reports;
2. Evaluating the realization of audit services on financial information by public accounting firm/public accountant;
3. Evaluating the effectiveness of implementation of the internal audit function (SKAI & Anti-Fraud);
4. Reviewing the effectiveness and efficiency of quarterly internal control;
5. Reviewing the compliance with laws and regulations;
6. Selecting, appointing, or recommending and supervising the Independent Auditor's work for the service of annual financial information audit;

7. Menyeleksi, menunjuk atau merekomendasikan, dan mengawasi pekerjaan Auditor Independen untuk kaji ulang kinerja SKAI & Anti *Fraud* 3 (tiga) tahunan;
8. Meninjau ulang Piagam Komite Audit;
9. Menelaah Laporan Pokok-Pokok Audit Internal (LPPAI) SKAI & Anti *Fraud* Semesteran; dan
10. Meninjau ulang penyusunan rencana kerja tahunan SKAI & Anti *Fraud*.

Pelatihan dan/atau Peningkatan Komite Audit

Informasi terkait pelatihan dan/atau peningkatan yang diikuti oleh masing-masing anggota Komite Audit dapat dilihat pada bagian Dewan Komisaris dan Komite Pemantau Risiko.

7. Selecting, appointing, or recommending and supervising the Independent Auditor's work for the triennial review of SKAI & Anti-Fraud performances;
8. Reviewing the Audit Committee Charter;
9. Reviewing the SKAI Internal Audit Principles Report (LPPAI)
10. Reviewing the preparation of Annual Work Plan of SKAI & Anti- Fraud.

Audit Committee's Training and/or Development Programs

Information related to training and/or development programs attended by each member of Audit Committee can be seen in the Board of Commissioners and Risk Monitoring Committee sections.

Organ Pendukung Dewan Komisaris Board of Commissioners Supporting Organ

Dalam pelaksanaan tugasnya, Dewan Komisaris dibantu oleh organ di bawahnya, yaitu Sekretaris Dewan Komisaris.

In performing its duties, the Board of Commissioners is assisted by a subordinate organ, namely Secretary of the Board of Commissioners.

Sekretaris Dewan Komisaris

Sekretaris Dewan Komisaris diangkat oleh Bank dan bertanggung jawab membantu administrasi Dewan Komisaris dan mengoordinasikan kegiatan identifikasi, perencanaan, dan pelaksanaan strategi pengelolaan kegiatan kesekretariatan dan protokoler Dewan Komisaris. Dalam menjalankan tugasnya, Sekretaris Dewan Komisaris langsung bertanggung jawab kepada Dewan Komisaris, dengan tujuan menciptakan fungsi kesekretariatan Dewan Komisaris yang efektif dan efisien.

Secretary of the Board of Commissioners

Secretary of the Board of Commissioners is appointed by the Bank and is responsible for assisting the administration of the Board of Commissioners and coordinating identification, planning, and implementation of strategy of secretariat management and Board of Commissioners' protocols. In carrying out its duties, the Secretary of the Board of Commissioners is directly responsible to the Board of Commissioners, with the aim of creating an effective and efficient Board of Commissioners' secretariat function.

Tugas dan Tanggung Jawab Sekretaris Dewan Komisaris

Tugas dan tanggung jawab Sekretaris Dewan Komisaris sebagai berikut:

1. Membantu Dewan Komisaris dalam menjaga agar pelaksanaan BOC *Charter* secara teknis dapat dilakukan dengan tertib;
2. Mengatur terselenggaranya rapat Dewan Komisaris;
3. Menyiapkan risalah rapat untuk disahkan dalam rapat berikutnya;
4. Menyiapkan laporan tentang pelaksanaan keputusan rapat guna dikaji dalam rapat berikutnya; dan
5. Menjaga kerahasiaan seluruh dokumen yang menurut sifatnya harus dirahasiakan.

Duties and Responsibilities of Board of Commissioners' Secretary

Duties and responsibilities of Board of Commissioners' Secretary are as follows:

1. To help the Board of Commissioners in maintaining the implementation of BOC Charter technically, so that it can be conducted in an orderly manner;
2. To manage the implementation of Board of Commissioners' meetings;
3. To prepare minutes of meeting to be validated in the next meeting;
4. To prepare report on the implementation of meeting decisions in order to be reviewed in the next meeting; and
5. To maintain the confidentiality of all confidential documents.

Komite di bawah Direksi

Board of Directors' Subordinate Committees

Komite Manajemen Risiko

Komite Manajemen Risiko merupakan komite eksekutif di bawah Direksi yang dibentuk untuk memastikan efektivitas kerangka kerja manajemen risiko dan implementasi dalam mendukung strategi bisnis. Komite Manajemen Risiko juga bertanggung jawab untuk mengevaluasi dan merekomendasikan kebijakan manajemen risiko, strategi, *risk appetite*, *risk tolerance*, limit risiko, kerangka kerja manajemen risiko, dan rencana kontingensi untuk mengantisipasi kondisi abnormal, serta memastikan eksposur risiko untuk semua jenis risiko di Bank tetap sesuai dengan *risk appetite*.

Pedoman Komite Manajemen Risiko

Pelaksanaan tugas 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, Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016 tanggal 1 September 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola bagi Bank Umum, dan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum.

Pernyataan Independensi Komite Manajemen Risiko

Komite Manajemen Risiko bertindak secara independen, mandiri, dan profesional, serta menjalankan tugas dan tanggung jawabnya tanpa adanya benturan kepentingan atau pengaruh dari pihak manapun.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Manajemen Risiko

Selama tahun 2023, Komite Manajemen Risiko telah melaksanakan tugas dan tanggung jawabnya, yang meliputi:

1. Menyusun dan menyetujui kebijakan, strategi, dan pedoman penerapan manajemen risiko Bank, termasuk strategi kerangka kerja, metodologi, sistem, dan *tools* pengelolaan risiko termasuk rencana-rencana kontingensi dan memastikan penerapannya yang meliputi semua jenis risiko;
2. Melakukan penyempurnaan proses manajemen risiko secara berkala maupun bersifat insidental sebagai akibat dari suatu perubahan kondisi eksternal dan internal yang memengaruhi kecukupan permodalan, profil risiko, dan tidak efektifnya penerapan manajemen risiko berdasarkan hasil evaluasi;
3. Melakukan pengembangan atas penerapan budaya risiko untuk setiap jenjang organisasi;

Risk Management Committee

The Risk Management Committee is an executive committee under the Board of Directors which was formed to increase the effectiveness of the process implementation and risk management system according to the scale and complexity of the Bank's business. The Risk Management Committee also responsible to evaluate and recommend risk management policies, strategies, risk appetite, risk tolerance, risk limits, risk management framework, and contingency plan to anticipate any abnormal conditions, as well as ensuring all risk exposure for all types of risk at the Bank are in line with risk appetite.

Risk Management Committee Charter

The implementation of the Risk Management Committee's duties refers to Financial Services Authority Regulation No. 18/POJK.03/2016 dated 22 March 2016 on Risk Management Implementation for Commercial Banks, Financial Services Authority Circular No. 34/SEOJK.03/2016 dated 1 September 2016 on Risk Management Implementation for Commercial Banks, Financial Services Authority Regulation No. 17 of 2023 on Governance for Commercial Banks, and Financial Services Authority Circular Letter No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks.

Statement of Independence of Risk Management Committee

The Risk Management Committee acts independently, individually, and professionally, and carries out its duties and responsibilities without any conflict of interest or influence from any party.

Duties, Responsibilities, and the Realization of Risk Management Committee Duties

Throughout 2023, the Risk Management Committee performed its duties and responsibilities, including:

1. Preparing and approving the Bank's risk management policies, strategies and implementation guidelines, including the strategies' framework, methodology, system and risk management tools as well as contingency plans and ensuring that the implementation covers all types of risks
2. Improving the risk management process, both periodically or incidental as result of changes in the external and internal conditions affecting the capital adequacy, risk profile, and ineffective implementation of risk management based on evaluation results;
3. Developing the implementation of risk culture for each organizational level;

4. 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;
5. Mengevaluasi arah, strategi, dan program manajemen risiko;
6. Memantau implementasi Kebijakan dan Pedoman Umum Penerapan Manajemen Risiko, memantau posisi risiko secara komprehensif, mengkaji proses manajemen risiko secara berkala, mengevaluasi usulan aktivitas/produk baru, serta melakukan pengungkapan manajemen risiko yang mencakup kinerja dan arah kebijakan; dan
7. Mengevaluasi kualitas penerapan manajemen risiko dan perkembangan risiko-risiko yang melekat pada setiap produk dan aktivitas Bank.

Struktur dan Keanggotaan Komite Manajemen Risiko

Sesuai Keputusan Direksi No. 019A/SK-DIR/10/23 tanggal 19 Oktober 2023 tentang Pedoman Tata Tertib *Risk Management Committee*, susunan keanggotaan Komite Manajemen Risiko sebagai berikut:

1. Ketua diisi oleh Direktur Utama;
2. Wakil Ketua diisi oleh Direktur Kepatuhan dan Manajemen Risiko;
3. Sekretaris diisi oleh Kepala Divisi Manajemen Risiko;
4. Anggota diisi oleh Direksi dan *Senior Executive Vice President*;
5. Undangan Tetap Anggota diisi oleh Kepala Divisi SKAI & *Anti Fraud*, Kepala Divisi IT, Kepala Divisi *Treasury*, Kepala Divisi *Operation & Internal Control*, Kepala Divisi *Finance and Accounting*, Kepala Divisi *CMO*, Kepala Divisi Kepatuhan dan *System and Procedure*; dan
6. Undangan Tidak Tetap diisi oleh pihak internal dan eksternal yang diundang.

Rapat Komite Manajemen Risiko

Kebijakan dan pelaksanaan rapat Komite Manajemen Risiko diatur dalam Keputusan Direksi No. 019A/SK-DIR/10/23 tanggal 19 Oktober 2023 tentang Pedoman dan Tata Tertib *Risk Management Committee*. Komite Manajemen Risiko menyelenggarakan rapat secara berkala minimal 3 (tiga) bulan sekali. Dalam pelaksanaannya, rapat Komite Manajemen Risiko dapat dilaksanakan apabila dihadiri oleh minimal 51% dari anggota tetap.

Pada tahun 2023, Komite Manajemen Risiko melaksanakan rapat sebanyak 5 (lima) kali dengan tingkat kehadiran 71,00%.

Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Dalam Grup Keuangan, Komite Manajemen Risiko Terintegrasi adalah komite eksekutif yang bertanggung jawab memastikan penerapan manajemen risiko sesuai dengan karakteristik dan kompleksitas operasional Grup Keuangan Victoria.

4. 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;
5. Evaluating risk management direction, strategy, and program;
6. Monitoring the implementation of Policies and General Guidelines of Risk Management Implementation, monitoring the risk positions comprehensively, reviewing the risk management process periodically, evaluating any proposed new activities/products, as well as conducting risk management disclosure that includes performance and policy direction; and
7. Evaluating the quality of risk management implementation and development of risks inherent to every Bank's product and activity.

Structure and Composition of Risk Management Committee

Pursuant to the Board of Directors' Decision No. 019A/SK-DIR/10/23 dated 19 October 2023 on the Code of Conduct of Risk Management Committee, the membership composition of Risk Management Committee is as follows:

1. Chairperson held by the President Director;
2. Vice Chairperson held by the Director of Compliance and Risk Management;
3. Secretary held by the Head of Risk Management Division;
4. Members held by the Board of Directors and Senior Executive Vice President;
5. Permanent members held by Head of SKAI & Anti-Fraud Division, Head of IT Division, Head of Treasury Division, Head of Operation & Internal Control Division, Head of Finance and Accounting Division, Head of CMO Division, Head of Compliance and System and Procedure Division; and
6. Non-Permanent Members held by invited internal and external parties.

Risk Management Committee's Meeting

The policy and implementation of Risk Management Committee's meetings are regulated in the Board of Directors' Decision No. 019A/SK-DIR/10/23 dated 19 October 2023 on the Guidelines and Code of Conduct of Risk Management Committee. The Risk Management Committee holds regular meeting at least once every 3 (three) months in 1 (one) year. In its implementation, the Risk Management Committee meeting can be held if attended by at least 51% of the permanent members.

In 2023, the Risk Management Committee held 5 (five) meetings with an attendance rate of 71.00%.

Integrated Risk Management Committee in the Financial Group

Within the Financial Group, the Integrated Risk Management Committee is the executive committee responsible for ensuring the risk management implementation is in accordance with the characteristics and complexity of Victoria Financial Group.

Pedoman Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Berdasarkan Surat Otoritas Jasa Keuangan No. S-66/PB.33/2021 tanggal 23 Juni 2021 tentang Perubahan Status Konglomerasi Keuangan Grup Victoria menjadi Grup Keuangan Victoria, di mana Bank ditunjuk sebagai Entitas Koordinator. Pelaksanaan tugas dan tanggung jawab Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan tidak bertentangan dengan ketentuan Peraturan Otoritas Jasa Keuangan sepanjang dinyatakan tetap berlakunya 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, dan Peraturan Otoritas Jasa Keuangan No. 26/POJK.03/2015 tanggal 11 Desember 2015 tentang Kewajiban Penyediaan Modal Minimum Terintegrasi bagi Konglomerasi Keuangan.

Pernyataan Independensi Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Komite Manajemen Risiko Terintegrasi bertindak secara independen, mandiri, dan profesional, serta menjalankan tugas dan tanggung jawabnya tanpa adanya benturan kepentingan atau pengaruh dari pihak manapun.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Selama tahun 2023, Komite Manajemen Risiko Terintegrasi telah melaksanakan tugas dan tanggung jawabnya yang tercantum dalam Surat Keputusan Direksi No. 002/SK-DIR/08/21. Tugas dan tanggung jawab tersebut meliputi:

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

Berdasarkan Surat Keputusan Direksi No. 001/SK-DIR/08/21 tanggal 20 Agustus 2021, struktur dan keanggotaan Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria diungkapkan sebagai berikut:

Guidelines of Integrated Risk Management Committee in the Financial Group

Based on the 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. The implementation of duties and responsibilities of the Integrated Risk Management Committee in Financial Group does not conflict with the provisions of Financial Services Authority Regulation as long as it states the enforcement of Financial Services Authority Regulation No. 17/POJK.03/2014 dated 18 November 2014 on 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, and Financial Services Authority Regulation No. 26/POJK.03/2015 dated 11 December 2015 on the Integrated Capital Adequacy Ratio for Financial Conglomeration.

Statement of Independence of Integrated Risk Management Committee in the Financial Group

The Integrated Risk Management Committee acts independently, individually, and professionally, and carries out its duties and responsibilities without any conflict of interest or influence from any party.

Duties, Responsibilities, and Realization of Duties of Integrated Risk Management Committee in the Financial Group

Throughout 2023, the Integrated Risk Management Committee performed its duties and responsibilities as stated in Board of Directors' Decision Letter No. 002/SK-DIR/08/21. The duties and responsibilities include:

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 Integrated Risk Management Committee in the Financial Group

Based on the Board of Directors' Decision Letter No. 001/SK-DIR/08/21 dated 20 August 2021, the structure and composition of Integrated Risk Management Committee in the Victoria Financial Group are disclosed below:

1. Ketua (Anggota) diisi oleh Direktur Kepatuhan dan Manajemen Risiko Entitas Koordinator;
2. Sekretaris (Anggota) diisi oleh Kepala Divisi *Risk Management/Integrated* Entitas Koordinator; dan
3. Anggota diisi oleh Bank Victoria Syariah (Direktur yang membawahi fungsi manajemen risiko, dan Unit Manajemen Risiko), Victoria Sekuritas Indonesia (Direktur yang membawahi fungsi manajemen risiko, dan Unit Manajemen Risiko), Victoria Insurance (Direktur yang membawahi fungsi manajemen risiko, dan Pejabat Eksekutif yang memimpin Satuan Kerja Manajemen Risiko), Victoria Manajemen Investasi (Direktur yang membawahi fungsi manajemen risiko, dan Unit Manajemen Risiko), dan Victoria Alife Indonesia (Direktur yang membawahi fungsi manajemen risiko, dan Pejabat Eksekutif yang memimpin Satuan Kerja Manajemen Risiko).

Rapat Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Kebijakan dan pelaksanaan rapat Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan diatur dalam Surat Keputusan Direksi No. 002/SK-DIR/08/21 tentang Pedoman dan Tata Tertib Kerja Komite Manajemen Risiko Grup Keuangan Victoria. Rapat Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan diadakan secara berkala sekurang-kurangnya 1 (satu) kali setiap semester dalam setahun maupun insidental. Dalam pelaksanaannya, rapat dinyatakan kuorum apabila dihadiri minimal 51% dari anggota tetap.

Pada tahun 2023, Komite Manajemen Risiko Terintegrasi melaksanakan rapat sebanyak 2 (dua) kali dengan tingkat kehadiran 92,00%.

Assets and Liability Committee

Assets and Liabilities Committee (ALCO) adalah komite eksekutif yang membantu Direksi dalam mengoptimalkan pengelolaan aset dan liabilitas. ALCO bertujuan mencapai keuntungan optimal dengan meminimalkan risiko sekecil mungkin. Komite ini mengoordinasikan portofolio aset dan liabilitas Bank untuk memaksimalkan profit dengan memperhatikan kebutuhan likuiditas.

Pedoman ALCO

Pelaksanaan tugas ALCO mengacu pada Surat Keputusan Direksi No. 004/SK-DIR/09/19 tentang Pedoman dan Tata Tertib Kerja *Assets & Liabilities Committee* (ALCO).

Pernyataan Independensi ALCO

ALCO bertindak secara independen, mandiri, dan profesional, serta menjalankan tugas dan tanggung jawabnya tanpa adanya benturan kepentingan atau pengaruh dari pihak manapun.

1. Chairperson (Member) held by Director of Compliance and Risk Management of Coordinator Entity;
2. Secretary (Member) held by Head of Risk Management/Integrated Division of Coordinator Entity; and
3. Members held by Bank Victoria Syariah (Director in charge of risk management function, and Risk Management Unit), Victoria Sekuritas Indonesia (Director in charge of risk management function, and Risk Management Unit), Victoria Insurance (Director in charge of risk management function, and Executive Officer in charge of Risk Management Work Unit), Victoria Manajemen Investasi (Director in charge of risk management function, and Risk Management Unit), Victoria Alife Indonesia (Director in charge of risk management function, and Executive Officer in charge of Risk Management Work Unit).

Integrated Risk Management Committee's Meeting in Financial Group

The policy and implementation of Integrated Risk Management Committee's meeting in Financial Group is regulated in the Board of Directors' Decision Letter No. 002/SK-DIR/08/21 on Guidelines and Work Conduct of Risk Management Committee of Victoria Financial Group. The Integrated Risk Management Committee's meeting in Financial Group is held regularly at least 1 (once) every semester in a year or incidentally. In practice, a meeting is declared a quorum if attended by at least 51% of the permanent members.

In 2023, the Integrated Risk Management Committee held 2 (two) meetings with an attendance rate of 92.00%.

Assets and Liability Committee

The Assets and Liabilities Committee (ALCO) is an executive committee that assists the Board of Directors in optimizing the management of asset and liability. ALCO aims to achieve optimal profit by minimizing risk to the smallest possible level. This committee coordinates the Bank's asset and liability portfolios to maximize optimize profit with due observance of the liquidity needs.

ALCO Charter

The implementation of ALCO's duties refers to Board of Directors' Decision Letter No. 004/SK-DIR/09/19 on the Charter and Code of Conduct of Assets & Liabilities Committee (ALCO).

Statement of Independence of ALCO

ALCO acts independently, individually, and professionally, and carries out its duties and responsibilities without any conflict of interest or influence from any party.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas ALCO

Selama tahun 2023, ALCO telah melaksanakan tugas dan tanggung jawabnya, yang meliputi:

1. Memantau dan memperhatikan struktur neraca dan memaksimalkan profitabilitas;
2. Merencanakan, menetapkan, dan mengendalikan sumber dan penggunaan dana Bank;
3. Menetapkan tingkat suku bunga kredit maupun pendanaan;
4. Melakukan evaluasi anggaran dan realisasi Laporan Keuangan Bank dengan memperhatikan indikator-indikator/risiko Bank;
5. Merumuskan, menetapkan, dan mengevaluasi kebijakan, strategi, dan sasaran dalam beberapa bidang, yaitu Manajemen Strategi, Manajemen Likuiditas, Manajemen *Gap*, serta Manajemen Investasi dan Pendapatan (*Pricing*) dalam lingkup ALMA; dan
6. Memantau dan memperhatikan perkembangan kondisi ekonomi mikro maupun makro, seperti inflasi, nilai tukar, dan perkembangan suku bunga yang dapat memengaruhi kinerja Bank.

Struktur dan Keanggotaan ALCO

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:

1. Ketua diisi oleh Direktur Utama;
2. Sekretaris diisi oleh Kepala Divisi *Treasury*;
3. Anggota Tetap diisi oleh seluruh Direksi, seluruh *Senior Executive Vice President*, seluruh Kepala Divisi pada Direktorat Bisnis, Kepala Divisi *Risk Management/Integrated*, dan Kepala Divisi *Finance and Accounting*; dan
4. Anggota Tidak Tetap diisi oleh Divisi atau Unit Kerja Lain dan seluruh Kepala Area.

Rapat ALCO

Kebijakan dan pelaksanaan rapat ALCO diatur dalam Pedoman ALCO. ALCO minimal menyelenggarakan rapat 1 (satu) kali dalam 1 (satu) bulan atau sewaktu-waktu sesuai dengan kebutuhan. Dalam pelaksanaannya, rapat ALCO dinyatakan kuorum apabila dihadiri oleh minimal 50% dari Direksi, kecuali Direktur Kepatuhan dan Manajemen Risiko.

Pada tahun 2023, ALCO melaksanakan rapat sebanyak 12 (dua belas) kali dengan tingkat kehadiran 85,00%.

Komite Kredit

Komite Kredit dibentuk untuk mendukung proses pemberian kredit dan menentukan jumlah *Credit Exposure* Bank sesuai dengan limit yang telah ditetapkan.

Duties, Responsibilities, and the Realization of ALCO Duties

Throughout 2023, ALCO performed its duties and responsibilities, including:

1. Monitoring and overseeing the balance sheet structure and maximizing profitability;
2. Planning, establishing, and controlling the source and use of Bank funds;
3. Establishing interest rates on credit and funding;
4. Evaluating the budget and realization of the Bank's financial statements with due regard to the Bank's indicators/risks;
5. Formulating, establishing, and evaluating policies, strategies, and objectives in several areas, which are Strategic Management, Liquidity Management, Gap Management, and Investment and Pricing Management within the scope of ALMA; and
6. 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.

Structure and Composition of ALCO

Based on the 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, ALCO's composition is as follows:

1. Chairperson held by President Director;
2. Secretary held by Head of Treasury Division;
3. Permanent Member held by all Members of Board of Directors, all Senior Executive Vice President, all Division Head in the Business Directorate, Head of Risk Management/Integrated Division, and Head of Finance and Accounting Division; and
4. Non-Permanent Members held by Other Divisions or Work Units and all Area Heads.

ALCO's Meeting

Policy and implementation of ALCO meeting are regulated in the ALCO Charter. ALCO holds meeting at least 1 (once) a month or at any time as necessary. In practice, an ALCO meeting is declared as quorum if attended by at least 50% of the Board of Directors, except for the Director of Compliance and Risk Management

In 2023, ALCO held 12 (twelve) meetings with an attendance rate of 85.00%.

Credit Committee

Credit Committee is established to support the credit provision process and to determine the Bank's Credit Exposure amount in accordance with a specified limit.

Pedoman Komite Kredit

Pelaksanaan tugas Komite Kredit mengacu pada Surat Keputusan Direksi No. 008/SK-DIR/10/17 tanggal 9 Oktober 2017 tentang *Credit Policy Committee* PT Bank Victoria International Tbk.

Pernyataan Independensi Komite Kredit

Komite Kredit bertindak secara independen, mandiri, dan profesional, serta menjalankan tugas dan tanggung jawabnya tanpa adanya benturan kepentingan atau pengaruh dari pihak manapun.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Kredit

Komite Kredit telah menjalankan tugas dan tanggung jawabnya, yaitu memberikan persetujuan/penolakan terhadap usulan fasilitas penyediaan dana dari masing-masing divisi/unit pengusul.

Struktur dan Keanggotaan Komite Kredit

Struktur dan keanggotaan Komite Kredit Bank Victoria berdasarkan Surat Keputusan Direksi No. 008/SK-DIR/10/17 tanggal 9 Oktober 2017, terdiri dari:

1. Ketua diisi oleh Direktur Utama;
2. Wakil Ketua diisi oleh Direktur Bisnis dan Direktur Kredit;
3. Sekretaris merangkap Anggota diisi oleh Kepala Divisi dan/atau Kepala Bagian Divisi *Credit Analyst*; dan
4. Anggota diisi oleh Wakil Direktur Utama, Direktur Kepatuhan dan Manajemen Risiko, Kepala Divisi *SME & Consumer Banking*, Kepala Divisi *Commercial Banking*, Kepala Divisi *Financial Institution & Capital Market*, Kepala Divisi *Credit Administration*, Kepala Divisi Legal, Kepala Divisi *Risk Management/Integrated*, Kepala Divisi *Compliance & System Procedure*, Kepala Divisi *SKAI & Anti Fraud*, *Unit Head Business Support*, dan *Unit Head Corporate Banking*.

Rapat Komite Kredit

Kebijakan dan pelaksanaan rapat Komite Kredit diatur dalam Pedoman Komite Kredit. Komite Kredit menyelenggarakan rapat internal ataupun rapat sirkuler minimal 1 (satu) kali dalam 1 (satu) minggu atau sewaktu-waktu sesuai dengan kebutuhan. Keputusan anggota Komite Kredit harus kuorum dan bulat/*unanimous*. Jika terjadi perbedaan keputusan antar anggota Komite Kredit pemutus, maka kredit dianggap tidak disetujui.

Pada tahun 2023, Komite Kredit melaksanakan rapat sebanyak 89 kali dengan tingkat kehadiran 100,00%.

Komite Kebijakan Perkreditan

Direksi membentuk Komite Kebijakan Perkreditan untuk membantu Direksi dalam merumuskan Kebijakan Perkreditan Bank agar pemberian kredit dilakukan dengan hati-hati,

Credit Committee Charter

The Credit Committee performs its duties by referring to the Board of Commissioners' Decision Letter No. 008/SK-DIR/10/17 dated 9 October 2017 on Credit Policy Committee of PT Bank Victoria International Tbk.

Statement of Independence of Credit Committee

The Credit Committee acts independently, individually, and professionally, and carries out its duties and responsibilities without any conflict of interest or influence from any party.

Duties, Responsibilities, and the Realization of Credit Committee Duties

The Credit Committee carried out its duties and responsibilities, by approving/rejecting proposed funding facilities from each proposing division/unit.

Structure and Composition of Credit Committee

Structure and composition of Bank Victoria's Credit Committee based on the Board of Directors' Decision Letter No. 008/SK-DIR/10/17 dated 9 October 2017 consist of:

1. Chairperson held by President Director;
2. Vice Chairperson held by Director of Business and Director of Credit;
3. Secretary concurrently as Member held by Head of Division and/or Head of Credit Analyst Division; and
4. Members held Deputy President Director, Director of Compliance and Risk Management, Head of *SME & Consumer Banking Division*, Head of *Commercial Banking Division*, Head of *Financial Institution & Capital Market Division*, Head of *Credit Administration Division*, Head of *Legal Division*, Head of *Risk Management/Integrated Division*, Head of *Compliance & System Procedure Division*, Head of *SKAI and Anti-Fraud Division*, *Business Support Unit Head*, and *Corporate Banking Unit Head*.

Credit Committee Meeting

Policy and implementation of Credit Committee meeting are regulated in the Credit Committee Charter. The Credit Committee holds an internal meeting or circular meeting at least 1 (once) a week or at any time as necessary. 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.

In 2023, the Credit Committee held 89 meetings with an attendance rate of 100.00%.

Credit Policy Committee

The Board of Directors established the Credit Policy Committee to assist the Board of Directors in formulating the Bank's Credit Policy to enable careful provision of credit, monitoring and

memantau dan mengevaluasi pelaksanaan Kebijakan Perkreditan Bank yang telah dibuat sehingga dapat diketahui konsistensi, tanggung jawab, ataupun kendala-kendala yang ada di dalam penerapannya, memonitor perkembangan dan kondisi portfolio kredit, serta memberikan saran ataupun solusi sebagai langkah perbaikan ke depannya.

Pedoman Komite Kebijakan Perkreditan

Pelaksanaan tugas Komite Kebijakan Perkreditan mengacu pada Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2017 tentang Kewajiban Penyusunan dan Pelaksanaan Kebijakan Perkreditan atau Pembiayaan bagi Bank Umum, Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola bagi Bank Umum, dan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum.

Pernyataan Independensi Komite Kebijakan Perkreditan

Komite Kebijakan Perkreditan bertindak secara independen, mandiri, dan profesional, serta menjalankan tugas dan tanggung jawabnya tanpa adanya benturan kepentingan atau pengaruh dari pihak manapun.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Kebijakan Perkreditan

Selama tahun 2023, Komite Kebijakan Perkreditan telah melaksanakan tugas dan tanggung jawabnya dalam membantu Direktur Utama atas hal-hal yang berkaitan dengan, antara lain dan sekurang-kurangnya meliputi:

1. Memberikan masukan kepada Direksi dalam rangka penyusunan kebijakan perkreditan Bank, terutama yang berkaitan dengan perumusan prinsip kehati-hatian dalam perkreditan Bank;
2. 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;
3. Melakukan kajian terhadap kebijakan perkreditan Bank dan memberikan saran kepada Direksi apabila diperlukan perubahan kebijakan perkreditan Bank; dan
4. Memantau dan mengevaluasi perkembangan serta kualitas portofolio perkreditan, kewenangan pelaksanaan keputusan kredit, proses pemberian kredit kepada pihak terkait dan debitur-debitur besar, pelaksanaan ketentuan batas maksimum pemberian kredit, ketaatan terhadap perundang-undangan, penyelesaian kredit bermasalah sesuai kebijakan perkreditan Bank, dan upaya Bank memastikan kecukupan penyisihan penghapusan kredit.

Struktur dan Keanggotaan Komite Kebijakan Perkreditan

Struktur dan keanggotaan Komite Kebijakan Perkreditan Bank Victoria berdasarkan Surat Keputusan Direksi No. 021/SK-DIR/01/24 tanggal 24 Januari 2024, terdiri dari:

evaluating the implementation of the Bank's Credit Policy made to identify the consistencies, responsibilities, or any issues in its implementation, monitoring credit portfolio's development and condition, as well as providing recommendations or solutions for future improvement measures.

Credit Policy Committee Charter

The implementation of the Credit Policy Committee's duties refers to the Financial Services Authority Regulation No. 42/POJK.03/2017 on Obligation for Compilation and Implementation of Bank Credit or Financing Policies for Commercial Banks, Financial Services Authority Regulation No. 17 of 2023 concerning Governance for Commercial Banks, and Financial Services Authority Circular Letter No. 13/SEOJK.03/2017 concerning Implementation of Governance for Commercial Banks.

Statement of Independence of Credit Policy Committee

The Credit Policy Committee acts independently, individually, and professionally, and carries out its duties and responsibilities without any conflict of interest or influence from any party.

Duties, Responsibilities, and the Realization of Credit Policy Committee Duties

Throughout 2023, the Credit Policy Committee performed its duties and responsibilities in assisting the President Director on matters related to, among others, and at least include:

1. 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;
2. 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;
3. To review the Bank's credit policies and advise the Board of Directors if changes to the Bank's credit policy are necessary; and
4. To monitor and evaluate the development and quality of the credit portfolio, the authority to implement credit decision, the credit distribution process to related parties and major debtors, the implementation of the provisions on the maximum credit limit, adherence to regulations, settlement of non-performing loans in accordance with the Bank's credit policy, and the Bank's efforts to ensure the adequacy of the allowance for credit writeoff.

Structure and Composition of Credit Policy Committee

Structure and composition of Bank Victoria's Credit Policy Committee based on the Board of Directors' Decision Letter No. 021/SK-DIR/01/24 dated 24 January 2024 consist of:

1. Ketua diisi oleh Direktur Utama;
2. Wakil Ketua I merangkap Anggota diisi oleh Wakil Direktur Utama;
3. Wakil Ketua II merangkap Anggota diisi oleh Direktur Bisnis;
4. Sekretaris merangkap Anggota diisi oleh Kepala Divisi *Risk Management/Integrated*;
5. Anggota diisi oleh Direktur Keuangan, Direktur Kepatuhan dan Manajemen Risiko, *Senior EVP* Bisnis, *Senior EVP* Operasional & *International Banking*, Kepala Divisi *SME*, Kepala Divisi *Commercial Banking*, Kepala Divisi *Credit Risk Review*, Kepala Divisi *Loan & Trade Operations*, Kepala Divisi *Special Asset Management*, Kepala Divisi *Credit Legal*, Kepala Divisi *International Banking*, dan Kepala Departemen *Credit Monitoring & Collection*;
6. Undangan Tetap diisi oleh Kepala Divisi *SKAI & Anti Fraud*, Kepala Divisi *Corporate Legal*, Kepala Divisi *Treasury*, dan Kepala Divisi *Accounting*; dan
7. Undangan tidak tetap diisi oleh pihak internal dan eksternal yang diundang.

Rapat Komite Kebijakan Perkreditan

Kebijakan dan pelaksanaan rapat Komite Kebijakan Perkreditan diatur dalam Surat Keputusan Direksi No. 016B/SK-DIR/08/23 tanggal 16 Agustus 2023. Komite Kebijakan Perkreditan menyelenggarakan rapat secara berkala atau sewaktu-waktu apabila diperlukan (insidental). Dalam pelaksanaannya, rapat Komite Kebijakan Perkreditan dinyatakan kuorum apabila dihadiri oleh minimal 50% dari Direksi dan 50% dari anggota non-Direksi.

Pada tahun 2023, Komite Kebijakan Perkreditan melaksanakan rapat sebanyak 4 (empat) kali dengan tingkat kehadiran 71,00%.

Komite Teknologi Informasi

Komite Teknologi Informasi dibentuk untuk memastikan sistem teknologi informasi sesuai dengan strategi Bank, memberikan pandangan pada pengelolaan teknologi informasi dan manajemen sistem informasi, serta memantau kegiatan dan kesiapan infrastruktur teknologi informasi.

Pedoman Komite Teknologi Informasi

Pelaksanaan tugas Komite Teknologi Informasi mengacu pada Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2022 tanggal 6 Juli 2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum.

Pernyataan Independensi Komite Teknologi Informasi

Komite Teknologi Informasi bertindak secara independen, mandiri, dan profesional, serta menjalankan tugas dan tanggung jawabnya tanpa adanya benturan kepentingan atau pengaruh dari pihak manapun.

1. Chairperson held by President Director;
2. Vice Chairperson I concurrently as Member held by Deputy President Director;
3. Vice Chairperson II concurrently as Member held by Business Director;
4. Secretary concurrently as Member held by Head of Risk Management/Integrated Division;
5. Members held by Director of Finance, Director of Compliance and Risk Management, Senior EVP Business, Senior EVP Operations & International Banking, Head of SME Division, Head of Commercial Banking Division, Head of Credit Risk Review Division, Head of Loan & Trade Operations Division, Head of Special Asset Management Division, Head of Credit Legal Division, Head of International Banking Division, and Head of Credit Monitoring & Collection Department;
6. Permanent Members are held by Head of SKAI & Anti-Fraud Division, Head of Corporate Legal Division, Head of Treasury Division, and Head of Accounting Division; and
7. Non-Permanent Members held by invited internal and external parties.

Credit Policy Committee's Meeting

Policy and implementation of Credit Policy Committee meetings are regulated in the Board of Directors' Decision Letter No. 016B/SK-DIR/08/23 dated 16 August 2023. The Credit Policy Committee holds meetings on a regular basis or at any time necessary (incidental). In practice, Credit Policy Committee meeting is declared as quorum if attended by at least 50% of the Board of Directors and 50% of the non-Board of Directors members.

In 2023, the Credit Policy Committee held 4 (four) meetings with an attendance rate of 71.00 %.

Information Technology Committee

The Information Technology Committee was established to ensure the information technology system is in line with the Bank's strategy, to provide insight into information technology management and information system management, and to monitor activities and readiness of information technology infrastructure.

Information Technology Committee Charter

The implementation of the Information Technology Committee's duties refers to the Financial Services Authority Regulation No. 11/POJK.03/2022 dated 6 July 2022 on Information Technology Operations by Commercial Banks.

Statement of Independence of Information Technology Committee

The Information Technology Committee acts independently, individually, and professionally, and carries out its duties and responsibilities without any conflict of interest or influence from any party.

Duties, Responsibilities, and the Realization of

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Teknologi Informasi

Selama tahun 2023, Komite Teknologi Informasi telah melaksanakan tugas dan tanggung jawabnya dalam memberikan rekomendasi kepada Direksi yang paling kurang terkait dengan:

1. Membuat rencana strategis teknologi informasi yang sesuai dengan rencana strategis kegiatan usaha Bank;
2. Merumuskan kebijakan prosedur teknologi informasi sesuai dengan Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2022 tanggal 6 Juli 2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum;
3. Melakukan pemantauan kesesuaian proyek-proyek teknologi informasi yang disetujui dengan rencana strategis teknologi informasi;
4. Melakukan pemantauan kesesuaian proyek-proyek teknologi informasi dengan rencana proyek yang disepakati dalam *Service Level Agreement (SLA)*;
5. Melakukan pemantauan kesesuaian teknologi informasi dengan kebutuhan sistem informasi manajemen yang mendukung pengelolaan kegiatan usaha Bank;
6. Melakukan evaluasi terhadap efektivitas langkah-langkah manajemen risiko dalam teknologi informasi;
7. Melakukan pemantauan atas kinerja teknologi informasi dan upaya peningkatannya;
8. Melakukan penyelesaian berbagai masalah terkait teknologi informasi yang tidak dapat diselesaikan oleh satuan kerja pengguna dan satuan kerja penyelenggara; dan
9. Melakukan evaluasi kecukupan dan lokasi sumber daya yang dimiliki Bank.

Struktur dan Keanggotaan Komite Teknologi Informasi

Berdasarkan Surat Keputusan Direksi No. 011/SK-DIR/01/21 tanggal 29 Januari 2021, struktur dan keanggotaan Komite Teknologi Informasi diungkapkan sebagai berikut:

1. Ketua diisi oleh Direktur Utama;
2. Wakil Ketua diisi oleh Wakil Direktur Utama;
3. Koordinator diisi oleh *SEVP Change Management Office*;
4. Sekretaris diisi oleh Kepala Divisi *Information Technology*;
5. Anggota Tetap diisi oleh Direktur Kepatuhan dan Manajemen Risiko; Direktur Bisnis; Direktur Keuangan; *Senior Executive Vice President of Finance, Accounting & Management Information System*; *Senior Executive Vice President of Corporate, Business Linkage & Consumer Banking*; Kepala Divisi *Operations & Internal Control*; Kepala Divisi *Change Management Office*; dan Kepala Divisi *Branch Banking Network & Performance*; dan
6. Anggota Tidak Tetap diisi oleh Kepala Divisi *Risk Management/Integrated*, Kepala Divisi *Loan & Trade Operations*, Kepala Divisi *Human Capital Management & General Affair*, dan Wakil Kepala Divisi *Change Management Office*.

Information Technology Committee Duties

Throughout 2023, the Information Technology Committee performed its duties and responsibilities in providing recommendations to the Board of Directors which at least were related to:

1. Prepare information technology strategic plan in line with the strategic plan of the Bank's business activities;
2. Formulate information technology procedure policy in accordance with Financial Services Authority Regulation No. 11/POJK.03/2022 dated 6 July 2022 on Information Technology Operations by Commercial Banks;
3. Monitor the conformity of information technology projects, which are approved with the information technology strategic plan;
4. Monitor the conformity of the information technology projects with the project charter agreed in the *Service Level Agreement (SLA)*;
5. Monitor the conformity of information technology to the needs of management information system that supports the management of the Bank's business activities;
6. Evaluate the effectiveness of risk management measures in information technology;
7. Monitor the performance of information technology and its improvement efforts;
8. Settle various problems related to information technology that cannot be settled by a user work unit and an organizing work unit; and
9. Evaluate the adequacy and location of resources owned by the Bank.

Structure and Composition of Information Technology Committee

Based on the Board of Directors' Decision Letter No. 011/SK-DIR/01/21 dated 29 January 2021, the structure and composition of Information Technology Committee are disclosed as follows:

1. Chairperson held by President Director;
2. Deputy Chair held by Deputy President Director;
3. Coordinator held by *SEVP Change Management Office*;
4. Secretary held by Head of Information Technology Division;
5. Permanent Members held by Director of Compliance and Risk Management; Director of Business; Director of Finance; *Senior Executive Vice President of Finance, Accounting & Management Information System*; *Senior Executive Vice President of Corporate, Business Linkage & Consumer Banking*; Head of *Operations & Internal Control Division*; Head of *Change Management Office*; and Head of *Branch Banking Network & Performance Division*; and
6. Non-Permanent Members held by Head of *Risk Management/Integrated Division*, Head of *Loan & Trade Operations Division*, Head of *Human Capital Management & General Affair Division*, and Vice Head of *Change Management Office Division*.

Rapat Komite Teknologi Informasi

Kebijakan dan pelaksanaan rapat Komite Teknologi Informasi diatur dalam Surat Keputusan Direksi No. 011/SK-DIR/01/21 tanggal 29 Januari 2021. Komite Teknologi Informasi menyelenggarakan rapat minimal 1 (satu) kali dalam 6 (enam) bulan atau sewaktu-waktu sesuai dengan kebutuhan. Dalam pelaksanaannya, rapat Komite Teknologi Informasi dinyatakan kuorum apabila dihadiri oleh minimal 51% dari anggota tetap.

Pada tahun 2023, Komite Teknologi Informasi melaksanakan rapat sebanyak 4 (empat) kali dengan tingkat kehadiran 95,00%.

Komite Pemantau dan Pelaksanaan GCG

Komite Pemantau dan Pelaksanaan GCG sebagai organ pendukung Direksi bertugas menyusun, mengomunikasikan, mengawasi, dan melakukan tindakan perbaikan terhadap kepatuhan terhadap penerapan GCG, etika, pengendalian internal, dan strategi *Anti Fraud*.

Pedoman Komite Pemantau dan Pelaksanaan GCG

Pelaksanaan tugas Komite Pemantau dan Pelaksanaan GCG mengacu pada Surat Keputusan Direksi No. 016A/SK-DIR/08/23 tanggal 16 Agustus 2023 tentang Komite Pemantau dan Pelaksanaan *Good Corporate Governance* (GCG).

Pernyataan Independensi Komite Pemantau dan Pelaksanaan GCG

Komite Pemantau dan Pelaksanaan GCG bertindak secara independen, mandiri, dan profesional, serta menjalankan tugas dan tanggung jawabnya tanpa adanya benturan kepentingan atau pengaruh dari pihak manapun.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Pemantau dan Pelaksanaan GCG

Selama tahun 2023, Komite Pemantau dan Pelaksanaan GCG telah melaksanakan tugas dan tanggung jawabnya, antara lain:

1. Memantau dan menganalisis setiap kebijakan terbaru maupun praktik terbaik terkait penerapan GCG;
2. Melakukan pemutakhiran kebijakan internal (*existing*) terhadap setiap perubahan kebijakan GCG;
3. Memantau secara berkala terhadap rencana dan realisasi/pencapaian bisnis Bank melalui rapat-rapat Komite;
4. Memantau *action plan* dan pelaksanaannya melalui rapat-rapat Komite;
5. Menentukan aspek dan PIC/petugas dalam penyusunan GCG sesuai dengan bidang yang tercermin dari aspek-aspek GCG;
6. Mengoordinasikan pembuatan laporan pelaksanaan GCG yang dilengkapi dan didukung dengan *underlying*-nya; dan

Information Technology Committee's Meeting

Policy and implementation of Information Technology Committee meetings are regulated in the Board of Directors' Decision Letter No. 011/SK-DIR/01/21 dated 29 January 2021. The Information Technology Committee holds meetings at least 1 (once) every 6 (six) months or at any time as necessary. In practice, an Information Technology Committee meeting is declared as quorum if attended by at least 51% of the permanent members.

In 2023, the Information Technology Committee held 4 (four) meetings with an attendance rate of 95.00 %.

GCG Implementation and Monitoring Committee

The GCG Implementation and Monitoring Committee as the Board of Directors' supporting organ is in charge of preparing, communicating, supervising, and taking corrective actions for its compliance with the implementation of GCG, ethics, internal control, and Anti-Fraud strategy.

GCG Implementation and Monitoring Committee Charter

The implementation of duties of the GCG Implementation and Monitoring Committee refers to Board of Directors' Decision Letter No. 016A/SK-DIR/08/23 dated 16 August 2023 on Good Corporate Governance (GCG) Implementation and Monitoring Committee.

Statement of Independence of GCG Implementation and Monitoring Committee

GCG Implementation and Monitoring Committee acts independently, individually, and professionally, and carries out its duties and responsibilities without any conflict of interest or influence from any party.

Duties, Responsibilities, and the Realization of GCG Implementation and Monitoring Committee Duties

Throughout 2023, the GCG Implementation and Monitoring Committee performed its duties and responsibilities, including:

1. Monitoring and analyzing any current policy and best practices related to GCG implementation;
2. Updating the existing internal policies against any GCG policy changes;
3. Monitoring periodically on the Bank's plans and business realizations/achievements through Committee meetings;
4. Monitoring the action plan and its implementation through Committee meetings;
5. Determining aspects and person in charge/PIC in drafting GCG in accordance with the areas reflected in GCG aspects;
6. Coordinating the preparation of GCG implementation reports supplemented and supported by its underlying matters; and

7. Menyusun pelaporan pelaksanaan GCG Bank dan melakukan penilaian sendiri sesuai ketentuan berlaku, serta melaporkannya kepada Direktur Utama dan Otoritas Jasa Keuangan.

Struktur dan Keanggotaan Komite Pemantau dan Pelaksanaan GCG

Sesuai Surat Keputusan Direksi No. 016A/SK-DIR/08/23 tanggal 16 Agustus 2023, struktur dan keanggotaan Komite Pemantau dan Pelaksanaan GCG sebagai berikut:

1. Ketua diisi oleh Direktur Kepatuhan dan Manajemen Risiko;
2. Sekretaris diisi oleh Kepala Divisi *Compliance & System Procedure*;
3. Anggota Tetap diisi oleh Direksi (*Senior Executive Vice President*, Kepala Divisi SKAI & *Anti Fraud*, Kepala Divisi *Risk Management/Integrated*); dan
4. Anggota Tidak Tetap seluruh Kepala Divisi (berdasarkan undangan).

Rapat Komite Pemantau dan Pelaksanaan GCG

Kebijakan dan pelaksanaan rapat Komite Pemantau dan Pelaksanaan GCG diatur dalam Surat Keputusan Direksi No. 016A/SK-DIR/08/23 tanggal 16 Agustus 2023. Komite Pemantau dan Pelaksanaan GCG menyelenggarakan rapat secara berkala (bulanan) atau sewaktu-waktu sesuai dengan kebutuhan.

Pada tahun 2023, Komite Pemantau dan Pelaksanaan GCG melaksanakan rapat sebanyak 3 (tiga) kali dengan tingkat kehadiran 100,00%.

Komite Personalia

Komite Personalia membantu Direksi dalam merumuskan dan mengawasi kebijakan, memantau perkembangan ketenagakerjaan, serta memberikan saran dan langkah perbaikan yang sesuai peraturan ketenagakerjaan perbankan dan Undang-Undang Ketenagakerjaan di Indonesia.

Pedoman Komite Personalia

Pelaksanaan tugas Komite Personalia mengacu pada Undang-Undang No. 13 Tahun 2003 tentang Ketenagakerjaan, serta peraturan turunannya.

Pernyataan Independensi Komite Personalia

Komite Personalia bertindak secara independen, mandiri, dan profesional, serta menjalankan tugas dan tanggung jawabnya tanpa adanya benturan kepentingan atau pengaruh dari pihak manapun.

7. Preparing the reporting of the Bank's GCG implementation and conducting self-assessment in accordance with the prevailing provisions, and report it to the President Director and Financial Services Authority.

Structure and Composition of GCG Implementation and Monitoring Committee

Pursuant to the Board of Directors' Decision Letter No. 016A/SK-DIR/08/23 dated 16 August 2023, the structure and composition of GCG Implementation and Monitoring Committee are disclosed as follows:

1. Chairperson held by Director of Compliance and Risk Management;
2. Secretary held by Head of Compliance & System Procedure Division;
3. Permanent Members held by Board of Directors (*Senior Executive Vice President*, Head of SKAI & *Anti-Fraud Division*, Head of *Risk Management/Integrated Division*); and
4. Non-Permanent Members held by all Division Heads (based on invitation)

GCG Implementation and Monitoring Committee's Meeting

Policy and implementation of GCG Implementation and Monitoring Committee meetings are regulated in the Board of Directors' Decision Letter No. 016A/SK-DIR/08/23 dated 16 August 2023. GCG Implementation and Monitoring Committee holds meetings on a regular basis (monthly) or at any time as necessary.

In 2023, the GCG Implementation and Monitoring Committee held 3 (three) meetings with an attendance rate of 100.00%.

Personnel Committee

The Personnel Committee assists the Board of Directors in formulating and overseeing policy, monitoring employment progress, and advising suggestions and remedial measures in line with the labor regulations in banking and the Manpower Law in Indonesia.

Personnel Committee Charter

The implementation of the Personnel Committee's duties refers to Law No. 13 of 2003 on Manpower, and its derivative regulations.

Statement of Independence of Personnel Committee

The Personnel Committee acts independently, individually, and professionally, and carries out its duties and responsibilities without any conflict of interest or influence from any party.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Personalia

Selama tahun 2023, Komite Personalia telah melaksanakan tugas dan tanggung jawabnya dalam memberikan rekomendasi kepada Direksi atas hal-hal yang berkaitan dengan, antara lain:

1. Memberikan masukan kepada Direksi dalam merumuskan kebijakan ketenagakerjaan;
2. Mengawasi kebijakan yang berhubungan dengan karyawan agar dilaksanakan secara konsekuen dan konsisten;
3. Melakukan kajian terhadap kebijakan ketenagakerjaan Bank dan memberikan saran kepada Direksi apabila diperlukan perubahan kebijakan ketenagakerjaan Bank;
4. Memantau dan mengevaluasi efektivitas setiap karyawan; dan
5. Memberikan masukan dan solusi untuk hambatan dan masalah yang terjadi terkait dengan ketenagakerjaan Bank.

Struktur dan Keanggotaan Komite Personalia

Komite Personalia diangkat berdasarkan Surat Keputusan Direktur No. 008/SK-DIR/03/19 tanggal 27 Maret 2019. Adapun keanggotaan Komite Personalia Bank Victoria diungkapkan sebagai berikut:

1. Ketua diisi oleh Direktur Utama;
2. Sekretaris diisi oleh Kepala Divisi *Human Capital Management*;
3. Anggota Tetap diisi oleh Wakil Presiden Direktur Utama; dan
4. Anggota Tidak Tetap diisi oleh Direktur terkait dan Kepala Divisi.

Rapat Komite Personalia

Kebijakan dan pelaksanaan rapat Komite Personalia diatur dalam Surat Keputusan Direktur No. 008/SK-DIR/03/19 tanggal 27 Maret 2019. Komite Personalia menyelenggarakan rapat minimal 3 (tiga) kali dalam 1 (satu) tahun. Dalam pelaksanaannya, rapat Komite Personalia dinyatakan kuorum apabila dihadiri oleh minimal 51% dari anggota tetap.

Pada tahun 2023, Komite Personalia melaksanakan rapat sebanyak 6 (enam) kali dengan tingkat kehadiran 100,00%.

Komite Pengadaan

Komite Pengadaan dibentuk untuk membantu Direksi dalam mengelola pengadaan barang dan jasa, memastikan efektivitasnya, serta memastikan kepatuhan terhadap kebijakan dan prosedur yang berlaku di Bank.

Pedoman Komite Pengadaan

Pelaksanaan tugas Komite Pengadaan mengacu pada Surat Keputusan Direksi No. 010A/SK-DIR/01/23 tanggal 10 Januari 2023 tentang Komite Pengadaan PT Bank Victoria International Tbk.

Duties, Responsibilities, and the Realization of Personnel Committee Duties

Throughout 2023, the Personnel Committee performed its duties and responsibilities in providing recommendations to the Board of Directors on matters related to, among others:

1. Providing inputs to Board of Directors in formulating employment policies;
2. Overseeing employee-related policies to be consistently and consequently implemented;
3. Reviewing Bank's manpower policies and advising the Board of Directors if changes to the Bank's manpower policy are necessary;
4. Monitoring and evaluating the effectiveness of each employee; and
5. Providing inputs and solutions for the obstacles and problems that occur related to the Bank's employment.

Structure and Composition of Personnel Committee

The Personnel Committee is appointed based on the Board of Directors' Decision Letter No. 008/SK-DIR/03/19 dated 27 March 2019. The composition of Bank Victoria's Personnel Committee is disclosed below:

1. Chairperson held by President Director;
2. Secretary held by Head of Human Capital Management Division;
3. Permanent Member held by Deputy President Director; and
4. Non-Permanent Members held by relevant Directors and Division Heads.

Personnel Committee's Meeting

Policy and implementation of Personnel Committee meetings are regulated in the Board of Directors' Decision Letter No. 008/SK-DIR/03/19 dated 27 March 2019. The Personnel Committee holds meetings at least 3 (three) times in 1 (one) year. In its implementation, a Personnel Committee meeting is declared as quorum if attended by at least 51% of the permanent members.

In 2023, the Personnel Committee held 6 (six) meetings with an attendance rate of 100.00%.

Procurement Committee

The Procurement Committee was established to assist the Board of Directors in managing goods and services procurement, ensuring its effectiveness, and ensuring its compliance with the policies and procedures applicable at the Bank.

Procurement Committee Charter

The implementation of the Procurement Committee's duties refers to the Board of Directors' Decision Letter No. 010A/SK-DIR/01/23 dated 10 January 2023 on Procurement Committee of PT Bank Victoria International Tbk.

Pernyataan Independensi Komite Pengadaan

Komite Pengadaan bertindak secara independen, mandiri, dan profesional, serta menjalankan tugas dan tanggung jawabnya tanpa adanya benturan kepentingan atau pengaruh dari pihak manapun.

Tugas dan Tanggung Jawab Komite Pengadaan

Selama tahun 2023, Komite Pengadaan telah melaksanakan tugas dan tanggung jawabnya dalam melakukan evaluasi dan memberikan rekomendasi kepada Direksi terkait pelaksanaan kegiatan pengadaan barang dan jasa yang sekurang-kurangnya meliputi beberapa hal, sebagai berikut:

1. Meminta informasi untuk hal-hal yang diperlukan terkait pengadaan barang dan jasa dari berbagai pihak, baik internal maupun eksternal;
2. Memberikan persetujuan terhadap pengajuan pengadaan barang dan jasa;
3. Mengajukan persetujuan kepada Dewan Komisaris terhadap pengadaan barang/dan jasa dengan nilai/harga minimum sesuai yang diatur pada Anggaran Dasar Bank; dan
4. Memberikan masukan kepada Direksi terkait hal-hal penting dan relevan dalam perumusan kebijakan pengadaan barang dan jasa.

Struktur dan Keanggotaan Komite Pengadaan

Kedudukan Komite Pengadaan dalam struktur organisasi berada di bawah Direksi. Susunan komposisi Komite Pengadaan berdasarkan Surat Keputusan No. 010A/SK-DIR/01/23 tanggal 10 Januari 2023, diungkapkan sebagai berikut:

1. Ketua diisi oleh Direktur Utama;
2. Wakil Ketua diisi oleh Wakil Direktur Utama;
3. Sekretaris diisi oleh *HCM & General Affairs Division Head* dan *General Affairs Vice Division Head*;
4. Anggota Tetap diisi oleh Direktur; dan
5. Anggota Tidak Tetap diisi oleh Senior EVP, *Division Head* dan *Vice Division Head*.

Rapat Komite Pengadaan

Kebijakan dan pelaksanaan rapat Komite Pengadaan diatur dalam Surat Keputusan Keputusan Direksi No. 010A/SK-DIR/01/23 tanggal 10 Januari 2023. Komite Pengadaan menyelenggarakan rapat minimal 3 (tiga) dalam 1 (satu) tahun. Dalam pelaksanaannya, rapat Komite Pengadaan dinyatakan kuorum apabila dihadiri oleh minimal 51% dari anggota tetap.

Pada tahun 2023, Komite Pengadaan melaksanakan rapat sebanyak 13 (tiga belas) kali dengan tingkat kehadiran 100,00%.

Statement of Independence of Procurement Committee

The Procurement Committee acts independently, individually, and professionally, and carries out its duties and responsibilities without any conflict of interest or influence from any party.

Duties and Responsibilities of Procurement Committee

Throughout 2023, the Procurement Committee performed its duties and responsibilities in evaluating and providing recommendations to the Board of Directors regarding the implementation of goods and services procurement activities which at least cover several matters, as follows:

1. Asking for information on necessary matters related to the procurement of goods and services from various parties, both internal and external;
2. Providing approval on the procurement of goods and services;
3. 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; and
4. Providing inputs to the Board of Directors regarding important and relevant matters in the formulation of procurement policies of goods and services.

Structure and Composition of Procurement Committee

Procurement Committee's position in the organizational structure is under the Board of Directors. The composition of the Procurement Committee based on Decision Letter No. 010A/SK-DIR/01/23 dated 10 January 2023 is disclosed below:

1. Chairperson held by President Director;
2. Vice Chairperson held by Deputy President Director;
3. Secretary held by Head of HCM & General Affairs Division and General Affairs Vice Division Head;
4. Permanent Member held by President Director; and
5. Non-Permanent Members held by EVP Senior, Division Head, and Vice Division Head.

Procurement Committee's Meeting

Policy and implementation of Procurement Committee meetings are regulated in the Board of Board of Directors' Decision Letter No. 010A/SK-DIR/01/23 dated 10 January 2023. The Procurement Committee holds meetings at least 3 (three) times in 1 (one) year. In its implementation, the Procurement Committee meeting is declared as quorum if attended by at least 51% of the permanent members.

In 2023, the Procurement Committee held 13 (thirteen) meetings with an attendance rate of 100.00%.

Komite Produk

Komite Produk membantu Direksi dalam memberikan arahan kebijakan terkait pengelolaan produk *liabilities* dan *wealth management* agar produk tersebut dapat bersaing dan menghasilkan keuntungan bagi Bank. Dalam menjalankan tugasnya, Komite Produk memperhatikan kepentingan nasabah dan Bank, serta menerapkan prinsip kehati-hatian dan manajemen risiko.

Pedoman Komite Produk

Pelaksanaan tugas Komite Produk mengacu pada Surat Keputusan Direksi No. 002A/SK-DIR/10/22 tanggal 20 Oktober 2022 tentang Komite Produk PT Bank Victoria International Tbk.

Pernyataan Independensi Komite Produk

Komite Produk bertindak secara independen, mandiri, dan profesional, serta menjalankan tugas dan tanggung jawabnya tanpa adanya benturan kepentingan atau pengaruh dari pihak manapun.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Produk

Selama tahun 2023, Komite Produk telah melaksanakan tugas dan tanggung jawabnya, yaitu:

1. Memberikan masukan, pertimbangan, dan rekomendasi kepada Direksi terkait pengelolaan produk *asset and liabilities*, termasuk rencana penerbitan, pengembangan, modifikasi, dan analisis produk yang sudah ada;
2. Mengawasi penerapan kebijakan produk secara konsisten dan bertanggung jawab serta menemukan solusi untuk mengatasi hambatan atau kendala yang muncul; dan
3. Memantau dan mengevaluasi risiko potensial terhadap perkembangan penjualan produk, poin-poin pengawasan kebijakan produk, strategi kebijakan produk, dan portofolio produk. Selain itu, memberikan masukan dan saran kepada Direksi untuk menentukan langkah-langkah perbaikan yang diperlukan.

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 berdasarkan Surat Keputusan Direksi No. 002A/SK-DIR/10/22 tanggal 20 Oktober 2022 tentang Komite Produk PT Bank Victoria International Tbk, diungkapkan sebagai berikut:

1. Ketua *Steering Committee* diisi oleh Direktur Utama;
2. Anggota *Steering Committee* diisi oleh Wakil Direktur Utama, Direktur Bisnis, dan Direktur Kepatuhan dan Manajemen Risiko;
3. Ketua *Product Committee* diisi oleh *Senior Executive Vice President of Change Management Office*;

Product Committee

The Product Committee assists the Board of Directors in providing policy-related directives in connection with the management of liabilities and wealth management products so that such products can compete and generate profits for the Bank. In performing its duties, the Product Committee pays attention to the interests of the Bank and its customers, and applies prudential principles and risk management.

Product Committee Charter

The implementation of the Product Committee's duties refers to Board of Directors' Decision Letter No. 002A/SK-DIR/10/22 dated 20 October 2022 on Product Committee of PT Bank Victoria International Tbk.

Statement of Independence of Product Committee

The Product Committee acts independently, individually, and professionally, and carries out its duties and responsibilities without any conflict of interest or influence from any party.

Duties, Responsibilities, and the Realization of Product Committee Duties

Throughout 2023, the Product Committee performed its duties and responsibilities, which were:

1. Providing input, considerations, and recommendations to the Board of Directors regarding management of asset and liabilities products, including the plan of launching, developing, modifying, and analyzing the existing products;
2. Monitoring the implementation of product policy consistently and responsibly and seeking solutions to overcome obstacles or constraints that arise; and
3. Monitoring and evaluating potential risks to product sales developments, product policy monitoring points, product policy strategies, and product portfolio. In addition, providing input and advice to the Board of Directors to determine the necessary improvements.

Structure and Composition of 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. The structure and composition of Product Committee based on Board of Directors' Decision Letter No. 002A/SK-DIR/10/22 dated 20 October 2022 on Product Committee of PT Bank Victoria International Tbk are disclosed below:

1. Head of Steering Committee held by President Director;
2. Members of Steering Committee held by Deputy President Director, Director of Business, and Director of Compliance and Risk Management;
3. Head of Product Committee held by Senior Executive Vice President of Change Management Office;

4. Sekretaris diisi oleh *Change Management Office Division Head*; dan
5. Anggota diisi oleh *Senior Executive Vice President of Operations & International Banking; Senior Executive Vice President of Finance, Accounting & Strategic Performance Management; Information Technology Division Head; Operations & Internal Control Division Head; Compliance & System Procedure Division Head; Accounting Division Head; Treasury Division Head; Risk Management/Integrated Division Head; Branch Banking Network & Performance Vice Division Head; Product and Marketing Communication Vice Division Head; E-Channel and Digital Transformation Department Head*; dan *Commercial Banking Department Head*.

Rapat Komite Produk

Kebijakan dan pelaksanaan rapat Komite Produk diatur dalam Keputusan Keputusan Direksi No. 002A/SK-DIR/10/22. Komite Produk menyelenggarakan rapat secara berkala sebanyak 2 (dua) kali dalam setahun atau sewaktu-waktu apabila diperlukan (insidental). Dalam pelaksanaannya, rapat Komite Produk dinyatakan kuorum apabila dihadiri oleh minimal 50% dari anggota tetap.

Pada tahun 2023, Komite Produk melaksanakan rapat sebanyak 2 (dua) kali dengan tingkat kehadiran 100,00%.

4. Secretary held by *Change Management Office Division Head*; and
5. Member held by *Senior Executive Vice President of Operations & International Banking; Senior Executive Vice President of Finance, Accounting & Strategic Performance Management; Information Technology Division Head; Operations & Internal Control Division Head; Compliance & System Procedure Division Head; Accounting Division Head; Treasury Division Head; Risk Management/Integrated Division Head; Branch Banking Network & Performance Vice Division Head; Product and Marketing Communication Vice Division Head; E-Channel and Digital Transformation Department Head*; dan *Commercial Banking Department Head*.

Product Committee's Meeting

Policy and implementation of Product Committee meetings are regulated in the Board of Directors' Decision Letter No. 002A/SK-DIR/10/22. The Product Committee holds 2 (two) meetings in a year or at any time necessary (incidental). In its implementation, a Product Committee meeting is declared as quorum if attended by at least 50% of the permanent members.

In 2023, the Product Committee held 2 (two) meetings with an attendance rate of 100.00%.

Organ Pendukung Direksi Board of Directors' Supporting Organ

Dalam pelaksanaan tugasnya, Direksi dibantu oleh unit-unit di bawahnya. Unit-unit tersebut bertugas secara kolektif memberikan saran dan rekomendasi mengenai kebijakan terhadap pengelolaan Bank, serta melaksanakan fungsi-fungsi khusus yang memerlukan keahlian khusus.

Corporate Secretary

Corporate Secretary berfungsi sebagai penghubung antara Bank dengan pemangku kepentingan, dan bertanggung jawab untuk memantau kepatuhan Bank terhadap peraturan perundang-undangan yang berlaku, khususnya di bidang perbankan.

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;

In carrying out its duties, the Board of Directors is assisted by the units below it. These units have collective duties to provide suggestions and recommendations on the Bank's management policies and perform special functions that require specific expertise.

Corporate Secretary

Corporate Secretary functions as a liaison between the Bank and stakeholders, and is responsible for monitoring the Bank's compliance with applicable laws and regulations, particularly in banking sector.

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. Kebijakan dan Prosedur *Corporate Affair* berdasarkan Keputusan Direksi No. 021/SK-DIR/07/14 tanggal 21 Juli 2014 yang telah diperbarui menjadi Standar Operasional Prosedur *Corporate Secretary* Surat Keputusan Direksi No. 003/SKDIR/12/17 tanggal 13 Desember 2017; dan
3. Standar Operasional Prosedur Rapat Umum Pemegang Saham berdasarkan Keputusan Direksi No. 004/SKDIR/04/17 tanggal 21 April 2017.

2. Corporate Affair Policy and Procedure based on the Board of Directors' Decision 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 based on the Board of Directors' Decision No. 004/SK-DIR/04/17 dated 21 April 2017.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas *Corporate Secretary*

Selama tahun 2023, *Corporate Secretary* telah melaksanakan tugas dan tanggung jawabnya, yaitu:

1. Mengikuti perkembangan pasar modal, khususnya peraturan-peraturan yang berlaku di bidang pasar modal;
2. Memberikan pelayanan kepada masyarakat atas setiap Informasi yang dibutuhkan pemodal berkaitan dengan kondisi Bank;
3. Memberikan masukan kepada Direksi Bank untuk mematuhi ketentuan Undang-Undang No. 8 Tahun 1995 tentang Pasar Modal dan peraturan pelaksanaannya; dan
4. Sebagai penghubung atau *contact person* antara Bank dengan Otoritas Jasa Keuangan serta masyarakat.

Duties, Responsibilities, and the Realization of Corporate Secretary Duties


Throughout 2023, the Corporate Secretary performed its duties and responsibilities, which were:


1. To follow the capital market development, especially regulations applicable in capital market sector;
2. To provide services to the public for any information required by the investors in relation to the Bank's condition;
3. 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; and
4. To be the liaison or contact person between the Bank and Financial Services Authority and public.

Profil Kepala Divisi *Corporate Secretary*

Profile of Head of Corporate Secretary Division

CAPRIE ARDIRA AZHAR
Kepala Divisi *Corporate Secretary*
Head of Corporate Secretary
Division

 **Kewarganegaraan**
Nationality
Indonesia / Indonesian

 **Tempat Lahir**
Place of Birth
Jakarta

 **Usia**
Age
36 tahun / years old

 **Domisili**
Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat

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

Riwayat Pendidikan

Sarjana Hukum dari Universitas Padjadjaran (2012).

Rangkap Jabatan

Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:

Tidak ada.

Rangkap Jabatan

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

Sertifikasi

Sertifikasi Manajemen Risiko Level 3 dari Lembaga Sertifikasi Profesi Perbankan (2022-2026).

Hubungan Afiliasi

Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

Basis of Appointment and Term of Office

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

Education

Bachelor of Law from Padjadjaran University (2012).

Concurrent Positions

In Bank Victoria:
None.

Outside of Bank Victoria:

None.

History of Position

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

Certification

Risk Management Certification Level 3 from Banking Professional Certification Institute (2022-2026).

Affiliation Relationship

Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

Pelatihan dan/atau Peningkatan *Corporate Secretary*

Selama tahun 2023, *Corporate Secretary* telah mengikuti pelatihan dan/atau peningkatan kompetensi sebagai berikut:

1. *Outbond*: SQEW (oleh Internal Bank);
2. *Philosophy That Flows In My Soul* (oleh Internal Bank);
3. *Governance, Risk, and Compliance* (oleh Internal Bank);
4. Pembukaan Perdagangan Bursa Efek Indonesia dalam Rangka Peluncuran *Roadmap* Pasar Modal Indonesia 2023-2027 dan Apresiasi Hasil Penilaian *ASEAN Corporate Governance Scorecard* (ACGS) Tahun 2021 (oleh Bursa Efek Indonesia);
5. Pendalaman *Annual Report* (Peraturan Otoritas Jasa Keuangan 29/2016 & Surat Edaran Otoritas Jasa Keuangan 16/2021) dan *Sustainability Report* (POJK 51/2017) (oleh Komite Nasional Kebijakan Governansi);
6. Dengar Pendapat Konsep Peraturan Bursa No. I-I Tentang Pemecahan Saham dan Penggabungan Saham oleh Perusahaan Tercatat yang Menerbitkan Efek Bersifat Ekuitas (oleh Bursa Efek Indonesia);
7. *Refreshment* Sertifikasi Manajemen Risiko Jenjang 5 (oleh Efektif Pro);
8. Membentuk Pribadi yang Amanah dan Terpercaya (oleh Internal Bank);
9. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia);
10. Membangun Keyakinan Nasabah Aset Digital dari Risiko Siber (oleh Otoritas Jasa Keuangan);
11. *The Future Sustainability Reporting: An Exclusive Forum for Regulators and Listed Companies in Indonesia* (oleh Global Reporting Initiative, Bursa Efek Indonesia);
12. *Seminar Accelerating Sustainable Development: Experiences from the Frontliners in Promoting Sustainable Bond/Sukuk Issuances and Investment* (oleh Otoritas Jasa Keuangan, Bursa Efek Indonesia, Asian Development Bank, United Nations Development Programme);
13. Pendalaman Peraturan Otoritas Jasa Keuangan No. 42/POJK.04/2020 tentang Transaksi Afiliasi dan Transaksi Benturan Kepentingan dan POJK No. 17/POJK.04/2020 tentang Transaksi Material dan Perubahan Kegiatan Usaha Utama (oleh Indonesia Corporate Secretary Association);
14. Mengenal Lebih Jauh Pengaturan UU P25K Dalam Rangka Penguatan Sektor Pasar Modal (oleh Otoritas Jasa Keuangan);
15. *Mini Town Hall* (oleh Internal Bank);
16. *Anti Fraud Management For Leaders Batch 2* (oleh PT Kanatta Daya Indonesia);
17. *Compliance Refreshment* Emiten dan Perusahaan Publik (oleh Otoritas Jasa Keuangan dan Bursa Efek Indonesia);
18. Rapat Dengar Pendapat RPOJK Klustering SSK (oleh Otoritas Jasa Keuangan);
19. *Refreshment* Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme/Pendanaan Proliferasi Senjata Pemusnah Massal (oleh Internal Bank);

Corporate Secretary's Training and/or Improvement

Throughout 2023, the *Corporate Secretary* attended training and/or competency developments as follows:

1. *Outbond*: SQEW (by Internal Bank);
2. *Philosophy That Flows In My Soul* (by Internal Bank);
3. *Governance, Risk, and Compliance* (by Internal Bank);
4. Opening of Trading on the Indonesia Stock Exchange in the Context of Launching the 2023-2027 Indonesian Capital Market Roadmap and Appreciating the 2021 ASEAN Corporate Governance Scorecard (ACGS) Assessment Results (by Indonesia Stock Exchange);
5. In-depth Annual Report Study (Financial Services Authority Regulation 29/2016 & Financial Services Authority Circular 16/2021) and Sustainability Report (POJK 51/2017) (by the National Governance Policy Committee);
6. Hearing on the Concept of Exchange Regulation No. I-I on Stock Split and Reverse Stock by Listed Companies that Issue Equity Securities (by Indonesia Stock Exchange);
7. Refreshment of Risk Management Certification Level 5 (by Effective Pro);
8. Shaping a Trustworthy and Trusted Personality (by Internal Bank);
9. *Outlook Banking Regulation*: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute);
10. Building Digital Asset Customer Confidence from Cyber Risk (by Financial Services Authority);
11. *The Future Sustainability Reporting: An Exclusive Forum for Regulators and Listed Companies in Indonesia* (by Global Reporting Initiative, Indonesia Stock Exchange);
12. *Seminar of Accelerating Sustainable Development: Experiences from the Frontliners in Promoting Sustainable Bond/Sukuk Issuances and Investment* (by Financial Services Authority, Indonesia Stock Exchange, Asian Development Bank, United Nations Development Program);
13. In-depth Financial Services Authority Regulation Study No. 42/POJK.04/2020 on Transactions with Affiliation and Transactions with Conflict of Interest and POJK No. 17/POJK.04/2020 on Material Transaction and Changes of Main Business Activities (by Indonesia Corporate Secretary Association);
14. Get to Know More about the Provisions of P25K Law in the context of Strengthening the Capital Markets Sector (by Financial Services Authority);
15. *Mini Town Hall* (by Internal Bank);
16. *Anti-Fraud Management For Leaders Batch 2* (by PT Kanatta Daya Indonesia);
17. *Compliance Refreshment for Issuers and Public Companies* (by Financial Services Authority and Indonesia Stock Exchange);
18. SSK Clustering RPOJK Hearing Meeting (by Financial Services Authority);
19. Refreshment of Anti-Money Laundering and Counter-Terrorist Financing/Counter-Proliferation Financing of Weapons of Mass Destruction (by Internal Bank);

20. Sosialisasi Perdagangan Karbon melalui Bursa Karbon Indonesia (IDXCarbon) (oleh Bursa Efek Indonesia);
21. Penjelasan atas Peraturan Bursa No. I-A Tahun 2021 Terkait Ketentuan Free Float dan Penggunaan Form E009 pada Sistem Pelaporan SPE IDXnet (oleh Asosiasi Emiten Indonesia);
22. Sustainable Finance Making Our Sky Become Blue Forever (oleh Otoritas Jasa Keuangan); dan
23. ASEAN Corporate Governance Scorecard (ACGS) 2024 (oleh Otoritas Jasa Keuangan).

Satuan Kerja Audit Internal & Anti Fraud

Satuan Kerja Audit Internal (SKAI) & *Anti Fraud* adalah fungsi independen yang secara langsung bertanggung jawab kepada Direktur Utama. Fungsi ini berperan sebagai mitra bisnis strategis bagi seluruh tingkat manajemen, memberikan *assurance* dan konsultasi independen untuk meningkatkan nilai dan memperbaiki operasional Bank. SKAI & *Anti Fraud* menggunakan pendekatan sistematis dengan mengevaluasi dan meningkatkan efektivitas manajemen risiko, pengendalian, dan proses tata kelola bank.

Pedoman SKAI & Anti Fraud

Dalam melaksanakan tugas dan tanggung jawabnya, SKAI & *Anti Fraud* mengacu pada Piagam Audit Internal, Sistem, Prosedur, dan Teknik Pemeriksaan Internal, dan Standar Operasional Prosedur *Anti Fraud*. Pedoman-pedoman tersebut terus dikaji ulang dan diperbarui sesuai kondisi dan perkembangan organisasi, serta mengikuti perubahan peraturan perundang-undangan yang berlaku.

Tugas dan Tanggung Jawab SKAI & Anti Fraud

Tugas dan tanggung jawab utama SKAI & *Anti Fraud* sebagai berikut:

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;

20. Dissemination of Carbon Trading through the Indonesian Carbon Exchange (IDXCarbon) (by Indonesia Stock Exchange);
21. Explanation of Exchange Regulation No. I-A 2021 Regarding Free Float Provisions and Use of Form E009 in IDXnet SPE Reporting System (by Indonesian Issuers Association);
22. Sustainable Finance Making Our Sky Become Blue Forever (by Financial Services Authority); and
23. ASEAN Corporate Governance Scorecard (ACGS) 2024 (by Financial Services Authority).

Internal Audit Work Unit & Anti Fraud

The Internal Audit (SKAI) & Anti Fraud is an independent function that is directly responsible to the President Director. This function acts as a strategic business partner for all management levels, providing independent assurance and consulting to increase value and improve the Bank's operations. SKAI & Anti Fraud uses a systematic approach by evaluating and improving the effectiveness of risk management, control, and bank governance process.

SKAI & Anti Fraud Charter

In performing its duties and responsibilities, SKAI & Anti Fraud refers to the Internal Audit Charter, Internal Audit System, Procedure, and Technique, and Anti Fraud Standard Operating Procedure. Such charters are continuously reviewed and updated according to the organizational conditions and developments, and following changes to the applicable laws and regulations.

Duties and Responsibilities of the SKAI & Anti Fraud

The primary duties and responsibilities of SKAI & Anti Fraud are as follows:

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. 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.

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.

Kedudukan dan Struktur SKAI & Anti Fraud

Kedudukan SKAI & Anti Fraud berada langsung di bawah Direktur Utama. SKAI & 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. Kepala SKAI & Anti Fraud diangkat dan diberhentikan oleh Direktur Utama atas persetujuan Dewan Komisaris. Pengangkatan dan pemberhentian tersebut dilaporkan kepada regulator.

Position and Structure of SKAI & Anti Fraud

The position of SKAI & Anti Fraud is directly under the President Director. SKAI & Anti Fraud acts independently and is directly responsible to the President Director. This division has a direct communication line with the Audit Committee and the Board of Commissioners, has unrestricted access to all activities in the Bank, and is a management partner in realizing GCG implementation. The Head of SKAI & 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.


Profil Kepala Divisi SKAI & Anti Fraud


Profile of Head of SKAI & Anti Fraud Division

DJOKO SOENDJOJO

Kepala Divisi SKAI & Anti Fraud
Head of Corporate Secretary
Division

 **Kewarganegaraan**
Nationality
Indonesia / Indonesian

 **Tempat Lahir**
Place of Birth
Surabaya

 **Usia**
Age
55 tahun / years old

 **Domisili**
Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Keputusan Direksi No. 017/SK-DIR/HCM/11/21 tanggal 22 November 2021.

Riwayat Pendidikan
Sarjana Ekonomi dari STIE Malangkeucecwara Malang (1993).

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

- Riwayat Jabatan**
- Staff Senior Akuntansi dan Keuangan PT Bank Andromeda Kantor Pusat Jakarta (1995–1997);
 - Staff Senior Akuntansi dan Keuangan PT Bank Alfa BKKU Kantor Pusat Jakarta (1997–1999);
 - Staff Administrasi BBO-BKKU BBPN/IBRA Kantor Pusat Jakarta (2000–2004);
 - Staff Senior Keuangan & Custody Tim Likuidasi PT Bank Prasadha Utama Kantor Pusat Jakarta (2004);
 - Kepala Seksi Manajemen Risiko Bank Victoria (2005);
 - Kepala Seksi *Financial Control* Bank Victoria (2005–2006);
 - Kepala Satuan Kerja Audit Interen (SKAI) Bank Victoria (2006); dan
 - Kepala Divisi Administrasi Pengkreditan Bank Victoria (2015–2018).

- Sertifikasi**
- Sertifikasi Audit Intern Level Supervisor dari Lembaga Sertifikasi Profesi Perbankan (2022–2026); dan
 - Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2022–2024).

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

Basis of Appointment and Term of Office
Board of Directors' Decision No. 017/SK-DIR/HCM/11/21 dated 22 November 2021.

Education
Bachelor of Economics from STIE Malangkeucecwara, Malang (1993).

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

- History of Position**
- Senior Accounting and Finance Staff of PT Bank Andromeda, Jakarta Head Office (1995–1997);
 - Senior Accounting and Finance Staff of PT Bank Alfa BKKU, Jakarta Head Office (1997–1999);
 - Administration Staff of BBO-BKKU BBPN/IBRA, Jakarta Head Office (2000–2004);
 - Senior Staff of Finance & Custody of Liquidation Team of PT Bank Prasadha Utama, Jakarta Head Office (2004);
 - Head of Risk Management Section of Bank Victoria (2005);
 - Head of Financial Control Section of Bank Victoria (2005–2006);
 - Head of Internal Audit Unit (IAU) of Bank Victoria (2006); and
 - Head of Credit Administration Division of Bank Victoria (2015–2018).

- Certification**
- Supervisor Level of Internal Audit Certification from the Banking Profession Certification Institute (2022–2026); and
 - Risk Management Certification Level 4 from the Banking Profession Certification Institute (2022–2024).

Affiliation Relationship
Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

Komposisi dan Sertifikasi Profesi SKAI & Anti Fraud

Pada tahun 2023, terdapat 8 (delapan) orang personel SKAI & Anti Fraud. Anggota SKAI & Anti Fraud memiliki pendidikan dan kompetensi yang memadai sebagai auditor dan telah mendapatkan sertifikasi dalam manajemen risiko perbankan sesuai ketentuan Bank Indonesia. Berikut sertifikasi profesi yang dimiliki personel SKAI & Anti Fraud Bank:

Composition and Professional Certification of SKAI & Anti Fraud

In 2023, there were 8 (eight) personnel of SKAI & Anti Fraud. Members of SKAI & Anti Fraud have adequate education and competency as auditors and have received certification in banking risk management in accordance with the provisions of Bank Indonesia. The following are professional certification held by the Bank's SKAI & Anti Fraud personnel:

Nama Name	Jabatan Position	Sertifikasi Certifications	Masa Berlaku Validity Period	Penyelenggara Organizer
SERTIFIKASI AUDIT INTERNAL / INTERNAL AUDIT CERTIFICATION				
Djoko Soendjojo	Kepala Divisi Head of Division	Level Auditor Supervisor Supervisor Auditor Level	5 Desember 2026 5 December 2026	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Ferry A Deuning	Kepala Unit Head of Unit	Level Auditor Auditor Level	24 Agustus 2023 24 August 2023	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Joel Eka M Krissata	Senior Officer	Level Supervisor Supervisor Level	5 Desember 2026 5 December 2026	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Fadillah Syarif	Senior Officer	Level Supervisor Supervisor Level	5 Desember 2026 5 December 2026	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Jantamen Simanjuntak	Officer	Level Auditor Auditor Level	5 Desember 2026 5 December 2026	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Diah Rucihto Januar	Level Auditor Auditor Level	-	-	-
Yohanes Reynaldi	Level Auditor Auditor Level	-	-	-
Made Putera Kemara	Level Auditor Auditor Level	Level Auditor Auditor Level	6 Februari 2025 6 February 2025	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
SERTIFIKASI MANAJEMEN RISIKO / RISK MANAGEMENT CERTIFICATION				
Djoko Soendjojo	Kepala Divisi Head of Division	Manajemen Risiko Level 4 Risk Management Level 4	7 September 2024	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Ferry A Deuning	Kepala Unit Head of Unit	Manajemen Risiko Level 3 Risk Management Level 3	8 Desember 2024 8 December 2024	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Joel Eka M Krissata	Senior Officer	Manajemen Risiko Level 3 Risk Management Level 3	26 September 2024	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Fadillah Syarif	Senior Officer	Manajemen Risiko Level 3 Risk Management Level 3	26 September 2024	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Jantamen Simanjuntak	Officer	Manajemen Risiko Level 1 Risk Management Level 1	22 November 2026	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Diah Rucihto Januar	Senior Officer	-	-	-
Yohanes Reynaldi	Officer	Manajemen Risiko Level 1 Risk Management Level 1	29 November 2026	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Made Putera Kemara	Officer	Manajemen Risiko Level 1 Risk Management Level 1	15 Februari 2024 15 February 2024	Badan Sertifikasi Manajemen Risiko Risk Management Certification Institution
CERTIFICATE ANTI FRAUD MANAGER				
Ferry A Deuning	Kepala Unit Head of Unit	Certificate Anti Fraud Manager	2 November 2024	Asia Anti Fraud
Joel Eka M Krissata	Senior Officer	Certificate Anti Fraud Manager	29 September 2023	Asia Anti Fraud

Rapat SKAI & Anti Fraud

SKAI & Anti Fraud rutin mengadakan rapat dengan Komite Audit, Direksi, dan Dewan Komisaris setidaknya 4 (empat) kali dalam setahun. Pada setiap pertemuan, SKAI & Anti Fraud menyampaikan laporan hasil pemeriksaan audit triwulan. Pada tahun 2023, SKAI & Anti Fraud telah menggelar 12 (dua belas) rapat dengan Dewan Komisaris, Direksi, dan/atau Komite Audit.

Agenda Rapat SKAI & Anti Fraud

Agenda rapat SKAI & Anti Fraud dan Direksi meliputi rencana kerja SKAI & Anti Fraud tahun 2023, laporan pokok-pokok semester II tahun 2022 dan pakta integritas, laporan hasil pemeriksaan SKAI & Anti Fraud, hasil pemeriksaan KCU BIP dan *commercial large periode* Januari 2023, laporan hasil pemeriksaan SKAI & Anti Fraud dan pemeriksaan khusus, dan pembahasan *capital expenditure* dan *operating expenditure* 2024. Sementara agenda rapat SKAI & Anti Fraud dengan Dewan Komisaris dan Komite Audit meliputi realisasi audit triwulan III dan triwulan IV tahun 2022, realisasi rencana audit triwulan IV tahun 2022 dan triwulan I tahun 2023, *draft* laporan evaluasi SKAI & Anti Fraud BVI, realisasi rencana audit triwulan II tahun 2023, rencana audit triwulan III tahun 2023, dan realisasi rencana audit triwulan IV sampai dengan 15 Desember 2023.

Rencana dan Realisasi Pelaksanaan Kerja SKAI & Anti Fraud

Setiap tahun, SKAI & Anti Fraud menyusun rencana kerja sebagai panduan untuk melaksanakan kegiatan pemeriksaan tahunan dengan efektif. Pada tahun 2023, jumlah rencana dan realisasi pemeriksaan oleh SKAI & Anti Fraud sebagai berikut:

Jenis Pemeriksaan Type of Audit	Rencana Audit Audit Plan	Realisasi Audit Actual Audit	Pencapaian Achievement (%)
Pemeriksaan Kantor Cabang Utama Audit of Main Branch Office	14	14	100.00
Pemeriksaan Unit Kerja Bisnis Audit of Business Unit	5	5	100.00
Pemeriksaan Unit Kerja Non-Bisnis Audit of Non-Business Units	7	7	100.00

Temuan dan Tindak Lanjut Hasil Audit

Pada tahun 2023, hasil audit menghasilkan temuan yang telah dilaporkan kepada Dewan Komisaris dan Direksi. Temuan tersebut menghasilkan rekomendasi yang harus ditindaklanjuti oleh *auditee*. Rekomendasi yang telah diselesaikan akan diinformasikan kepada *auditee* dan Direksi, sementara rekomendasi yang masih tertunda akan terus dipantau penyelesaiannya oleh SKAI & Anti Fraud. Jumlah temuan hasil audit di sepanjang tahun 2023 sebanyak 681 temuan, 571 temuan atau 83,85% telah ditindaklanjuti dan sebanyak 110 temuan atau 16,15% masih dalam proses perbaikan.

SKAI & Anti Fraud's Meeting

SKAI & Anti Fraud regularly holds meetings with Audit Committee, Board of Directors, and Board of Commissioners at least 4 (four) times in a year. At each meeting, SKAI & Anti Fraud submits a report of audit results every quarter. In 2023, SKAI & Anti Fraud conducted 12 (twelve) meetings with the Board of Commissioners, Board of Directors, and/or Audit Committee.

Meeting Agenda for SKAI & Anti Fraud

The agenda for the SKAI & Anti Fraud meeting with the Board of Directors encompasses the SKAI & Anti Fraud work plan for the year 2023, highlights of the second semester report of 2022 and the integrity pact, SKAI & Anti Fraud inspection findings, inspection results of the BIP branch and commercial large clients for the period of January 2023, SKAI & Anti Fraud inspection results and special inspections, as well as discussions on capital expenditure and operating expenditure for 2024. Meanwhile, the agenda for the SKAI & Anti Fraud meeting with the Board of Commissioners and the Audit Committee includes the realization of the third and fourth quarter audits for the year 2022, realization of the fourth quarter audit plan for 2022 and the first quarter of 2023, draft evaluation report of SKAI & Anti Fraud BVI, realization of the second quarter audit plan for 2023, audit plan for the third quarter of 2023, and realization of the fourth quarter audit plan until 15 December 2023.

Work Plan and Realization of SKAI & Anti Fraud

Every year, SKAI & Anti Fraud prepares a work plan as a guide in conducting annual audit effectively. In 2023, the number of plans and actual audits conducted by SKAI & Anti Fraud were as follows:

Findings and Follow-Up on Audit Results

The audit carried out in 2023 resulted findings reported to the Board of Commissioners and Board of Directors. These findings resulted in recommendations that must be followed-up by the *auditee*. Completed recommendations will be informed to the *auditee* and Board of Directors, while pending recommendations will continuously be monitored for the completion by SKAI & Anti Fraud. Throughout the year 2023, there were a total of 681 audit findings. Of these, 571 findings, or 83.85%, have been addressed, while 110 findings, or 16.15%, are still undergoing improvement processes.

Pelatihan dan/atau Peningkatan SKAI & Anti Fraud

Selama tahun 2023, SKAI & Anti Fraud telah mengikuti pelatihan dan/atau peningkatan kompetensi sebagai berikut:

1. *Fundamental IT Audit for Internal Auditor: Planning, Performing and Presenting* (oleh PT Andalan Teknologi Inovasi);
2. *Risk Based Audit* (oleh PT Kanatta Daya Indonesia);
3. *Induction Program* (oleh Bank Victoria);
4. *Philosophy that Flows in My Soul* (oleh Bank Victoria);
5. *Governance, Risk, and Compliance* (oleh Bank Victoria);
6. *Building Trust and Transparency* (oleh Paques);
7. *Global Professional Accountant: Technology, Skills and Globalization* (oleh Perbanas Institute dan Institut Akuntan Publik Indonesia);
8. Pencegahan, Pendeteksian dan Pengendalian *Fraud* (oleh PT Globe Persada Indonesia);
9. *Liquidity Coverage Ratio (LCR) and Net Stable Funding Ration (NSFR)* (Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 dan Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017) (oleh Risiko Manajemen Gagasan);
10. Investigasi Audit Forensik sebagai Cara Pencegahan dan Mitigasi *Fraud* (oleh Banking Finance Development Center);
11. *Team Building dan Outbound: Working Together in Harmony* (oleh Bank Victoria);
12. Audit Kredit Bank Berbasis Manajemen Risiko (oleh Lembaga Pusat Studi Informasi);
13. *Refreshment* Sertifikasi Manajemen Risiko: *Risk in Digital World* (oleh PT Efektifpro Knowledge Source);
14. Membangun keyakinan Nasabah Aset Digital dari Risiko Siber (oleh Otoritas Jasa keuangan Institute);
15. ISO 27001 tentang Sistem Manajemen Keamanan Informasi (oleh Veda Praxis);
16. *Outlook Banking Regulation: Tantangan Industri Perbankan, Arah Regulasi, dan Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia);
17. Identifikasi Dokumen dan Pemeriksaan Keaslian Mata Uang Kertas (Rupiah dan Valas) - *Batch 4* (oleh PT Andara Sarana);
18. Bank Victoria Mendukung Penuh Pemerintah dalam Mencegah Anti Pencucian Uang dan Pendanaan Terorisme (APU dan PPT) (oleh PT Andara Sarana);
19. *Refreshment* Pencegahan Tindak Pidana Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana);
20. *Refreshment Financial Integrity Rating (FIR) dan Tindak Pidana Pencucian Uang (TPPU) Jelang Pemilu 2024* (oleh PT Andara Sarana);
21. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia);
22. *Coaching and Sharing* Kepala Operasional (oleh Bank Victoria);
23. Revitalisasi Kompetensi Surat Pemberitahuan Tahunan (oleh Forum Komunikasi Satuan Pengawasan Intern Wilayah Jawa Barat – Banten);

SKAI & Anti Fraud's Training and/or Improvement

Throughout 2023, SKAI & Anti Fraud attended training and/or competency developments as follows:

1. Fundamental IT Audit for Internal Auditor: Planning, Performing and Presenting (by PT Andalan Teknologi Inovasi);
2. Risk Based Audit (by PT Kanatta Daya Indonesia);
3. Induction Program (by Bank Victoria);
4. Philosophy that Flows in My Soul (by Bank Victoria);
5. Governance, Risk, and Compliance (by Bank Victoria);
6. Building Trust and Transparency (by Paques);
7. Global Professional Accountant: Technology, Skills and Globalization (by Perbanas Institute and Institute of Public Accountants Indonesia);
8. Fraud Prevention, Detection and Control (by PT Globe Persada Indonesia);
9. Liquidity Coverage Ratio (LCR) and Net Stable Funding Ration (NSFR) (Financial Services Authority Regulation No. 42/POJK.03/2015 and Financial Services Authority Regulation No. 50/POJK.03/2017) (by Risk Management Ideas);
10. Forensic Audit Investigation as a Way of Fraud Prevention and Mitigation (by Banking Finance Development Center);
11. Team Building and Outbound: Working Together in Harmony (by Bank Victoria);
12. Risk Management Based Bank Credit Audit (by Information Study Center Institute);
13. Risk Management Certification Refreshment: Risk in Digital World (by PT Efektifpro Knowledge Source);
14. Building Customer Confidence in Digital Assets from Cyber Risk (by Financial Services Authority Institute);
15. ISO 27001 on Information Security Management System (by Veda Praxis);
16. Banking Regulation Outlook: Banking Industry Challenges, Regulatory Directions, and Future Banking (by Indonesian Banking Development Institute);
17. Document Identification and Authenticity Check of Paper Currency (Rupiah and Forex) - Batch 4 (by PT Andara Sarana);
18. Bank Victoria Fully Supports the Government in Preventing Anti-Money Laundering and Financing of Terrorism (AML/CFT) (by PT Andara Sarana);
19. Refreshment on Prevention of Money Laundering, Prevention of Financing of Terrorism and Prevention of Financing of Proliferation of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana);
20. Refreshment of Financial Integrity Rating (FIR) and Money Laundering Crimes Ahead of the 2024 Election (by PT Andara Sarana);
21. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute);
22. Coaching and Sharing Head of Operations (by Bank Victoria);
23. Revitalization of Annual Notification Letter Competency (by Communication Forum for Internal Audit Units in West Java - Banten Region);

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|---|---|
| <p>24. <i>Compliance Risk for Financial Technology</i>, Lembaga Pengembangan Perbankan Indonesia dan Fintech Indonesia (oleh Asosiasi FinTech Indonesia);</p> <p>25. Meningkatkan Efektivitas Sinergi Kerja Fungsi SKAI, Kepatuhan dan Risiko (oleh Equivalent Training Center);</p> <p>26. Buka Puasa Bersama 2023 (oleh Bank Victoria);</p> <p>27. <i>Anti Fraud Management for Leaders Batch 2</i> (oleh Kanatta Daya);</p> <p>28. <i>Webinar Forensic Audit</i> (oleh Universitas Sarjanawiyata Tamansiswa);</p> <p>29. Sosialisasi Kebijakan <i>Risk Register</i> (oleh Bank Victoria);</p> <p>30. <i>National Anti Fraud Conference 2023</i> (oleh Association of Certified Fraud Examiners);</p> <p>31. <i>Refreshment</i> Laporan Hasil Penilaian Kepatuhan (LHPK) Sistem Pembayaran dan <i>Financial Market Infrastructure</i> Bank Indonesia serta Kantor Pengelola Daftar Hitam Nasional (SP dan FMI BI serta KPDHN) Tahun 2023 (oleh Bank Indonesia);</p> <p>32. <i>Expert Sharing Session - Keuangan Berkelanjutan</i> (oleh Otoritas Jasa Keuangan Institute);</p> <p>33. <i>Induction Training Program</i> (oleh Bank Victoria); dan</p> <p>34. Sosialisasi/<i>Focus Group Discussion Compliance Champion - Budaya Kepatuhan</i> (oleh Bank Victoria).</p> | <p>24. Compliance Risk for Financial Technology, Indonesian Banking Development Institute and Fintech Indonesia (by Indonesian FinTech Association);</p> <p>25. Improving the Effectiveness of Work Synergy of SKAI, Compliance and Risk Functions (by Equivalent Training Center);</p> <p>26. Breaking the Fast Together 2023 (by Bank Victoria);</p> <p>27. Anti Fraud Management for Leaders Batch 2 (by Kanatta Daya);</p> <p>28. Forensic Audit Webinar (by Sarjanawiyata Tamansiswa University);</p> <p>29. Socialization of Risk Register Policy (by Bank Victoria);</p> <p>30. National Anti Fraud Conference 2023 (by Association of Certified Fraud Examiners);</p> <p>31. Refreshment of Compliance Assessment Report (LHPK) of Payment System and Financial Market Infrastructure of Bank Indonesia and National Blacklist Management Office (SP and FMI BI and KPDHN) in 2023 (by Bank Indonesia);</p> <p>32. Expert Sharing Session - Sustainable Finance (by Financial Services Authority Institute);</p> <p>33. Induction Training Program (by Bank Victoria); and</p> <p>34. Socialization/Focus Group Discussion Compliance Champion - Compliance Culture (by Bank Victoria).</p> |
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Akuntan Publik Public Accountant

Audit eksternal oleh pihak independen diperlukan untuk memastikan akuntabilitas informasi terutama pada aspek keuangan agar Bank dapat menentukan langkah strategis dan kebijakan yang mendukung keberlanjutan bisnis. Sesuai dengan Peraturan Otoritas Jasa Keuangan No. 32/POJK.03/2016, audit Laporan Keuangan Bank dilakukan oleh akuntan publik yang independen, kompeten, profesional, dan objektif sesuai Standar Profesional Akuntan Publik. Penunjukan akuntan publik untuk memberikan jasa audit harus diputuskan oleh RUPS dengan mempertimbangkan usulan Dewan Komisaris.

Informasi Jasa Assurance dan/atau Non Assurance yang Diberikan Akuntan Publik atau Kantor Akuntan Publik dan/atau Afiliasi atau Jaringannya

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 13/POJK.03/2017, audit atas Laporan Keuangan Bank dilakukan oleh akuntan publik maksimal selama 3 (tiga) tahun

External audit by an independent party is necessary to ensure information accountability, particularly in financial aspect so that the Bank can determine the right strategic steps and policies to support business sustainability. Pursuant to the Financial Services Authority Regulation No. 32/POJK.03/2016, audits on the Bank's Financial Statements are conducted by an independent, competent, professional, and objective public accountant in accordance with Public Accountant Professional Standards. The appointment of public accountant to provide audit services shall be resolved by the GMS with due observance of the Board of Commissioners' proposal.

Information on Assurance and/or Non-Assurance Services Provided by Public Accountant or Public Accounting Firm and/or its Affiliates or Network

Pursuant to the Financial Services Authority Regulation No. 13/POJK.03/2017, audits on the Bank's Financial Statements are conducted by public accountant for 3 (three) consecutive

buku secara berturut-turut. Oleh karena itu, Bank Victoria menyajikan daftar kantor akuntan publik, akuntan publik, jasa yang diberikan, dan nilai imbalan jasa (honorarium) untuk audit Laporan Keuangan Konsolidasian Bank Victoria selama 5 (lima) tahun terakhir.

fiscal years at most. Therefore, Bank Victoria presents a list of public accounting firms, public accountants, services provided, and honorarium given in regard of auditing Bank Victoria's Consolidated Financial Statements for the last 5 (five) years.

Uraian Description	Tahun Buku Fiscal Year				
	2023	2022	2021	2020	2019
Kantor Akuntan Publik Public Accounting Firm	Purwanto, Sungkoro & Surja (member of Ernst & Young)			Tanudiredja, Wibisana, Rintis dan Rekan (member of Pricewaterhouse Cooper) Tanudiredja, Wibisana, Rintis and Partners (member of Pricewaterhouse Cooper)	
Akuntan Publik Public Accountant	Yovita	Yovita	Yovita	Jimmy Pangestu, SE	Jimmy Pangestu, SE
Nomor Izin Akuntan Publik Public Accountant License Number	AP. 0242	AP. 0242	AP. 0242	AP. 1124	AP. 1124
Masa Kontrak Contract Period	Januari-Desember January-December				
Biaya (Rp) Fee (Rp)	1,650,000,000	2,320,000,000	1,550,000,000	1,700,000,000	1,500,000,000

Jasa Non-Audit yang Diberikan Akuntan Publik

Selama tahun 2023, tidak terdapat jasa lain yang diberikan oleh Kantor Akuntan Publik Purwanto, Sungkoro & Surja selain jasa audit Laporan Keuangan Tahun Buku 2023. Dengan demikian, tidak terdapat biaya yang dikeluarkan untuk jasa non-audit.

Non-Auditing Services Provided by Public Accountant

Throughout 2023, there were no other services provided by Public Accounting Firm Purwanto, Sungkoro & Surja office other than auditing services for Financial Statements for 2023 fiscal year. As such, there was no expense incurred for non-audit services.

Koordinasi Akuntan Publik dengan Auditor Internal dan Komite Audit

Bank secara konsisten meningkatkan komunikasi antara akuntan publik, auditor internal, dan Komite Audit untuk mengurangi kendala selama proses audit serta memastikan bahwa proses audit sesuai dengan Standar Profesional Akuntan, perjanjian kerja, ruang lingkup audit yang telah ditetapkan, serta selesai sesuai target waktu. Bank secara rutin mengadakan pertemuan untuk membahas masalah yang mungkin muncul dan menangani perbedaan pendapat antara akuntan publik dan auditor internal.

Coordination between Public Accountant and Internal Auditor and Audit Committee

The Bank consistently improves communication between the public accountant, internal auditor, and Audit Committee to reduce constraints that may occur during the audit process and to ensure that the audit process is in accordance with Accountant Professional Standards, work agreement, audit scope that has been determined, and completed according to the target time. The Bank regularly holds meetings to address issues that may arise and handle dissenting opinion between the public accountant and the internal auditor.

Sistem Pengendalian Internal

Internal Control System

Sistem Pengendalian Internal (SPI) merupakan komponen penting dalam manajemen dan operasional Bank. Efektivitas SPI membantu menjaga aset bank, memastikan pelaporan keuangan dan manajerial yang dapat dipercaya, meningkatkan kepatuhan terhadap peraturan, dan mengurangi risiko kerugian, penyimpangan, serta pelanggaran aspek kehati-hatian.

Ruang Lingkup Pengendalian Internal

Bank Victoria menerapkan SPI dengan merujuk pada Surat Edaran Otoritas Jasa Keuangan No. 35/SEOJK.03/2017 tentang Pedoman Standar Sistem Pengendalian Internal bagi Bank Umum. Tanggung jawab implementasi pengendalian internal yang andal dan efektif di Bank melibatkan seluruh pihak dalam organisasi, meliputi:

1. **Direksi**
Bertanggung jawab 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.
2. **Dewan Komisaris**
Bertanggung jawab mengawasi pelaksanaan pengendalian internal secara umum, termasuk kebijakan Direksi yang menetapkan pengendalian internal.
3. **SKAI & Anti Fraud**
Bertanggung jawab 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.
4. **Pejabat Eksekutif dan Karyawan**
Bertanggung jawab 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 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.

The Internal Control System (SPI) is an important component in the Bank's management and operations. The effectiveness of SPI helps maintain Bank's assets, ensure reliable financial statements and managerial reports, improve compliance with regulations, and reduce risk of losses, deviation, and breaches of prudential aspects.

Internal Control Scope

Bank Victoria applies SPI by referring to the Financial Services Authority Circular No. 35/SEOJK.03/2017 on Guidelines for Standards of Internal Control System for Commercial Banks. The responsibility for implementing reliable and effective internal control at the Bank involves all parties in the organization, including:

1. **Board of Directors**
Responsible for 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.
2. **Board of Commissioners**
Responsible for supervising the implementation of internal control in general, including the Board of Directors' policies that establish internal control.
3. **SKAI & Anti Fraud**
Responsible for 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 reporting channels are adequate and that internal auditors have the expertise, particularly regarding the practice and application of risk assessments.
4. **Executive Officers and Employees**
Responsible for implementing the internal control established by the Bank's management. Through effective internal control, the responsibilities of 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 including the Financial Services Authority, external auditors, and Bank's customers who have an interest in the implementation of reliable and effective internal controls.

Dewan Komisaris dan Direksi juga memiliki peran khusus dalam memastikan komitmen, perilaku, kepedulian, dan implementasi pengendalian internal yang tepat dalam seluruh kegiatan operasional Bank. Untuk itu, Dewan Komisaris dan Direksi menetapkan unsur-unsur lingkungan pengendalian, yaitu:

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; dan
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 SPI dengan 3 (tiga) tujuan utama, yaitu efektivitas operasional, keandalan pelaporan, dan kepatuhan kepada ketentuan yang berlaku. Implementasi SPI ini mengacu pada kerangka pengendalian internal yang dikembangkan oleh *Committee of Sponsoring Organizations of Treadway Commission* (COSO). COSO membagi pengendalian internal dalam 5 (lima) komponen yang saling terkait, yaitu:

1. Lingkungan pengendalian;
2. Penilaian risiko;
3. Aktivitas pengendalian;
4. Informasi dan komunikasi; dan
5. Kegiatan pemantauan.

Komponen Pengendalian Internal

Bank memiliki 5 (lima) komponen pengendalian internal yang saling berkaitan, dengan uraian sebagai berikut:

1. **Pengawasan oleh Manajemen dan Budaya Pengendalian**
 - a. Dewan Komisaris bertanggung jawab untuk mengesahkan dan mengkaji kebijakan dan strategi usaha Bank, memahami dan mengendalikan risiko utama Bank,

The Board of Commissioners and Board of Directors also have a particular role in ensuring appropriate commitments, behaviors, concerns, and implementation of internal controls in the Bank's operational activities. For this reason, the Board of Commissioners and Board of Directors established elements of controlled environment, namely:

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; 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 implements SPI with 3 (three) main objectives, namely operational effectiveness, reporting reliability, and compliance with applicable regulations. The SPI implementation refers to the internal control framework developed by the Committee of Sponsoring Organizations of Treadway Commission (COSO). COSO divides internal control into 5 (five) interrelated components, which are:

1. The controlled environment;
2. Risk assessment;
3. Controlled activities;
4. Information and communication; and
5. Monitoring activity.

Internal Control Components

The Bank has 5 (five) interrelated internal control components, described as follows:

1. **Control by the Management and Control Culture**
 - a. The Board of Commissioners is responsible for validating and reviewing the Bank's business policies and strategies, understanding and controlling the Bank's

menetapkan struktur organisasi, dan memastikan pemantauan efektivitas implementasi SPI; dan

- b. Direksi bertanggung jawab untuk melaksanakan kebijakan dan strategi Dewan Komisaris, mengembangkan prosedur pengendalian risiko, mempertahankan struktur organisasi yang jelas, menetapkan kebijakan dan prosedur pengendalian internal, dan memantau efektivitas SPI.

Dalam melaksanakan tanggung jawab tersebut, Dewan Komisaris dan Direksi bertanggung jawab untuk meningkatkan etika kerja dan integritas dalam menciptakan budaya organisasi yang menekankan pentingnya pengendalian internal di Bank. Hal ini dilakukan dengan:

- a. Menjadi panutan bagi seluruh karyawan, dengan komitmen pribadi tinggi terhadap pengembangan Bank yang sehat;
- b. Mengelola *human capital* dengan menempatkan karyawan sesuai keterampilan, pengetahuan, dan perilaku; dan
- c. Meningkatkan kesadaran karyawan tentang efektivitas tugas dan tanggung jawab mereka, serta mendorong karyawan untuk mengomunikasikan setiap permasalahan dalam kegiatan operasional Bank kepada manajemen terkait.

Seluruh kebijakan, standar, dan prosedur operasional didokumentasikan untuk mendukung efisiensi penerapan budaya pengendalian. Bank juga mengelola kebijakan untuk menghindari peluang penyimpangan atau pelanggaran guna memperkuat nilai-nilai etika.

2. Identifikasi dan Penilaian Risiko

Untuk mengidentifikasi, menganalisis, dan menilai risiko yang dihadapi, Direksi Bank melakukan penilaian risiko. Bank secara berkelanjutan memantau dan mengidentifikasi semua jenis risiko, menetapkan limit dan teknik pengendalian risiko dengan bantuan auditor internal sehingga cakupan audit lebih luas. Jika risiko belum terkendali, Bank akan melakukan peninjauan ulang pengendalian internal.

3. Kegiatan Pengendalian Internal dan Pemisahan Fungsi

Kegiatan pengendalian internal di Bank direncanakan dan dipantau secara efektif. Kegiatan pengendalian internal Bank mencakup kebijakan, prosedur, dan praktik yang diuraikan sebagai berikut:

- a. Kaji Ulang Manajemen
Direksi sebagai *top level management* melakukan kaji ulang melalui rapat berkala bersama Dewan Komisaris dan SKAI & *Anti Fraud*. Rapat tersebut membahas Laporan Hasil Pemeriksaan Audit untuk kaji ulang hasil pemeriksaan rutin dan khusus.
- b. Kaji Ulang Kinerja Operasional
SKAI & *Anti Fraud* secara rutin berkomunikasi dengan komite-komite di bawah Direksi seperti ALCO, Komite Manajemen Risiko, dan Komite GCG untuk memastikan pengendalian internal pada level operasional.

main risks, determining the organizational structure, and ensuring the monitoring of the effectiveness of SPI implementation; and

- b. The Board of Directors is responsible for implementing policies and strategies of the Board of Commissioners, developing risk control procedure, maintaining a clear organizational structure, establishing internal control policies and procedures, and monitoring the effectiveness of SPI.

In carrying out these responsibilities, the Board of Commissioners and Board of Directors are responsible for improving work ethics and integrity in creating an organizational culture that emphasizes the importance of internal control in the Bank. This is done by:

- a. Being role models to all employees, with a high personal commitment to the development of a sound Bank;
- b. Managing human capital by placing employees in accordance with their skills, knowledge, and behavior; and
- c. Raising employee awareness on the effectiveness of their duties and responsibilities, and encouraging employees to communicate to relevant management regarding every problem in the Bank's operational activities.

All of the operational policies, standards, and procedures are documented to support the efficient implementation of the control culture. The Bank also manages policy to avoid opportunities of deviation or violation in order to strengthen ethical value.

2. Risk Identification and Assessment

To identify, analyze, and assess risks that will be faced, the Bank's Board of Directors conducts risk assessment. The Bank continuously monitors and identifies all types of risks, establishes such risk limit and control technique with the assistance of the internal auditor for wider audit coverage. In the event that the risk has not been controlled, the Bank will re-assess the internal control.

3. Activities of Internal Control and Separation of Functions

Internal control activities at the Bank are planned and monitored effectively. The Bank's internal control activities include policies, procedures, and practices described as follows:

- a. Management Review
The Board of Directors as top-level management reviews through regular meetings with the Board of Commissioners and SKAI & *Anti Fraud*. Such meetings discuss the Audit Result Report to review the results of routine and special audits.
- b. Operational Performance Review
SKAI & *Anti Fraud* regularly communicates with committees under the Board of Directors such as ALCO, Risk Management Committee, and GCG Committee to ensure that internal control is at the operational level.

- c. **Pengendalian Sistem Informasi**
Bank menerapkan pengendalian internal pada sistem informasi dan teknologi melalui audit rutin di Divisi *Information Technology* dan Divisi *Business Analytic and MIS*.
- d. **Pengendalian Aset Fisik**
Pengendalian atas aset fisik dilakukan melalui audit tahunan di Divisi *Human Capital Management & General Affair* untuk memastikan keamanan fisik aset Bank.
- e. **Dokumentasi**
Formalisasi dan pendokumentasian kebijakan, prosedur, sistem, standar akuntansi, dan proses audit dengan memadai. Selain itu, melakukan pembaruan berkala terhadap kebijakan dan SOP yang selanjutnya disampaikan kepada pejabat dan karyawan untuk mengakomodir kebutuhan Bank secara aktual.

Bank juga menerapkan prinsip pemisahan fungsi dalam kegiatan pengendalian internal untuk mencapai efektivitas dan mencegah kesalahan atau penyimpangan di setiap level organisasi. Prinsip pemisahan fungsi ini diwujudkan melalui Keputusan Direksi No. 007/SK-DIR/01/18 tanggal 11 Januari 2018 tentang Pendelegasian Wewenang Biaya Unit Kerja *General Affair*.

4. Sistem Akuntansi, Informasi, dan Komunikasi

Sistem akuntansi mencakup metode dan catatan untuk mengidentifikasi, mengelompokkan, menganalisis, mengklasifikasi, mencatat, dan melaporkan transaksi sesuai standar akuntansi di Indonesia. Sementara itu, sistem informasi dikelola dengan baik dan diperbarui secara berkala untuk menghasilkan laporan yang akurat dan tepat waktu mengenai kegiatan usaha, kondisi keuangan, manajemen risiko, dan pemenuhan ketentuan. Pengelolaan sistem informasi mencakup rencana pemulihan darurat dan *backup* untuk mencegah kegagalan usaha yang berisiko tinggi. Adapun sistem komunikasi dikelola agar dapat memberikan informasi secara tepat waktu kepada semua pihak, baik internal maupun eksternal.

5. Kegiatan Pemantauan dan Tindakan Koreksi Penyimpangan

Bank secara berkala melakukan pemantauan dan evaluasi terhadap risiko utama, baik oleh Unit Kerja Operasional (*risk taking unit*) maupun oleh SKAI & *Anti Fraud*. Auditor internal melakukan pemeriksaan operasional dan keuangan di berbagai kantor Bank, mencakup perkreditan, Dana Pihak Ketiga (DPK), penerapan APU dan PPT, *Know Your Customer* (KYC), teller dan uang tunai, *security, service excellence*, Laporan Keuangan, gedung dan inventaris, dan lainnya. Setiap kelemahan dalam pengendalian internal yang diidentifikasi oleh unit risiko, auditor internal, ataupun pihak lain akan segera dilaporkan kepada pejabat atau Direksi yang berwenang untuk ditindaklanjuti.

- c. **Information System Control**
The Bank implements internal control over information and technology system through routine audit in Information Technology Division and Business Analytic and MIS Division.
- d. **Control of Physical Assets**
Physical asset control is performed through annual audit to Human Capital Management & General Affair Division to ensure the physical security of the Bank's assets.
- e. **Documentation**
Formalizing and documenting policies, procedures, systems, accounting standards, and audit process adequately. In addition, periodically renewing the policies and SOP which are then conveyed to officials and employees to accommodate the Bank's actual requirements.

The Bank also applies the principle of separation of functions in internal control activities to achieve effectiveness and prevent mistakes or deviations at every organizational level. This principle of function separation is manifested through the Board of Directors' Decision Letter No. 007/SK-DIR/01/18 dated 11 January 2018 on Authorization Delegation of the General Affair Work Unit's Cost.

4. Accounting, Information, and Communication Systems

The accounting system includes methods and records to identify, group, analyze, classify, record, and report transactions in accordance with accounting standards in Indonesia. Meanwhile, the information system is properly managed and updated periodically in order to produce accurate and timely reports on business activities, financial conditions, risk management, and compliance with provisions. The management of information system includes contingency recovery plans and back up to prevent high risk business failures. The communication system is managed to provide timely information to all parties, both internal and external.

5. Monitoring Activities and Corrective Actions

The Bank periodically monitors and evaluates primary risks, both by the Operating Unit (risk taking unit) and by SKAI & Anti Fraud. Internal auditor conducts operational and financial auditing checks in various Bank's offices, including credit, Third Party Funds (DPK), APU and PPT implementation, Know Your Customer (KYC), tellers and cash, security, service excellence, Financial Statements, building and inventory, and others. Any weaknesses in internal control identified by risk taking units, internal auditors, or other parties must be immediately reported to the authorized officers or Directors for follow-up.

Tinjauan atas Efektivitas Sistem Pengendalian Internal 2023

Bank senantiasa memantau efektivitas pengendalian internal dengan memprioritaskan pemantauan pada risiko utama. Evaluasi dilakukan oleh SKAI & *Anti Fraud* dan hasilnya disampaikan kepada Direksi serta dilaporkan ke Dewan Komisaris melalui Komite Audit. Evaluasi tahun 2023 menunjukkan bahwa SPI di Bank telah memadai. Langkah-langkah tindak lanjut telah diambil untuk meminimalisir risiko dan melakukan perbaikan, termasuk penginian kebijakan, prosedur, dan sistem.

Pernyataan Dewan Komisaris dan Direksi atas Kecukupan Sistem Pengendalian Internal

Dewan Komisaris dan Direksi Bank secara berkelanjutan dan konsisten meninjau SPI Bank. Dewan Komisaris dan Direksi memandang bahwa penerapan SPI di tahun 2023 cukup efektif dalam mengawasi aktivitas operasional, keuangan, dan tata kelola yang sesuai dengan peraturan perundang-undangan.

Fungsi Kepatuhan Compliance Function

Bank Victoria membentuk Fungsi Kepatuhan sebagai unit independen yang membantu dan bertanggung jawab langsung kepada Direktur yang memimpin Fungsi Kepatuhan. Fungsi Kepatuhan bertujuan mengantisipasi perkembangan tantangan dan risiko usaha bank yang semakin besar.

Pedoman Fungsi Kepatuhan

Dalam melaksanakan tugas dan tanggung jawabnya, Fungsi Kepatuhan mengacu pada Peraturan Otoritas Jasa Keuangan No. 46/POJK.03/2017 tentang Pelaksanaan Fungsi Kepatuhan bagi Bank Umum.

Penanggung Jawab Fungsi Kepatuhan

Bank secara khusus telah memiliki Direktur Kepatuhan dan Manajemen Risiko serta Divisi *Compliance & System Procedure* yang berfokus dan bertanggung jawab pada pelaksanaan fungsi kepatuhan di Bank Victoria. Pelaksanaan fungsi kepatuhan juga secara aktif diawasi oleh Dewan Komisaris. Berikut tugas dan tanggung jawab masing-masing pihak tersebut dalam menjalankan fungsi kepatuhan:

Overview of the Effectiveness of Internal Control System in 2023

The Bank consistently monitors the effectiveness of internal control by prioritizing monitoring of primary risks. The evaluation is performed by SKAI & *Anti Fraud* and the results are submitted to the Board of Directors and reported to the Board of Commissioners through Audit Committee. The 2023 evaluation shows that the Bank's SPI is adequate. Follow-up measures were taken to minimize risks and make refinement, including in updating policies, procedures, and systems.

Statement of Board of Commissioners and Board of Directors on the Internal Control System Adequacy

The Bank's Board of Commissioners and Board of Directors continuously and consistently review the Bank's SPI. The Board of Commissioners and Board of Directors considered that the SPI implementation in 2023 was quite effective in supervising operational, financial, and governance activities in accordance with the laws and regulations.

Bank Victoria established the Compliance Function as an independent unit that assists and is directly responsible to the Director leading the Compliance Function. Compliance Function aims to anticipate the growing challenges and risks in the bank's business.

Compliance Function Charter

In performing its duties and responsibilities, the Compliance Function refers to the Financial Services Authority Regulation No. 46/POJK.03/2017 on Implementation of Compliance Function of Commercial Banks.

Person in Charge of the Compliance Function

The Bank specifically hired a Director of Compliance and Risk Management and Compliance & 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. 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;
- 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 kelompok 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 & 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 mengizinkan dan menyempurnakan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan;

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 Financial Services Authority, and the laws and regulations;
- 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

3. Compliance & 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;

- 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.

Divisi *Compliance & System Procedure* melaporkan seluruh aktivitasnya dalam melaksanakan tugas dan tanggung jawabnya langsung kepada Direktur Kepatuhan dan Manajemen Risiko.

- 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.

The Compliance & System Procedure Division reports all of its activities in performing its duties and responsibilities directly the Director of Compliance and Risk Management.


Profil Kepala Divisi Compliance & System Procedure Division


Profile of the Head of Compliance & System Procedure Division

RR UTAMI TJIPTO

Kepala Divisi Compliance & System Procedure
Head of Compliance & System Procedure Division

 **Kewarganegaraan**
Nationality
Indonesia / Indonesian

 **Tempat Lahir**
Place of Birth
Jakarta

 **Usia**
Age
61 tahun / years old

 **Domisili**
Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Keputusan Direksi No. 001/SK-DIR/HCM/06/23 tanggal 5 Juni 2023.

Riwayat Pendidikan
Sarjana Hukum dari Universitas Airlangga (1986).

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

- Riwayat Jabatan**
- *Recovery Litigation Group Head* dan berbagai posisi di PT Bank CIMB Niaga Tbk (2009-2010);
 - *Compliance & Legal Group Head* PT Bank ICB Bumiputera Tbk (2010-2012);
 - *Head of Compliance & Procedure* PT Bank QNB Indonesia Tbk (2012-2017);
 - *Core Team* PT Asuransi Candi Utama establishment (2018-2019);
 - *Head of Legal Compliance AML & Corporate Secretary* PT Asuransi Candi Utama (2020-2023); dan
 - Kepala Divisi *Compliance & System and Procedure* Bank Victoria (2023).

- Sertifikasi**
- Sertifikasi *Compliance Manager* (CPM) dari Ikatan Bankir Indonesia (2016);
 - Sertifikasi Asesor dari Sertifikasi Profesi Perbankan (2017);
 - Sertifikasi Manajemen Risiko Level 4 dari Sertifikasi Profesi Perbankan (2019); dan
 - Sertifikasi Manajemen Risiko - *Qualified Chief Risk Officer* dari Lembaga Sertifikasi Profesi - Mitra Kalyana Sejahtera (2022).

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

Basis of Appointment and Term of Office
Board of Directors' Decision No. 001/SK-DIR/HCM/06/23 dated 5 June 2023.

Education
Bachelor of Laws from Airlangga University (1986).

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

- Concurrent Positions**
- *Recovery Litigation Group Head* and various positions at PT Bank CIMB Niaga Tbk (2009-2010);
 - *Compliance & Legal Group Head* of PT Bank ICB Bumiputera Tbk (2010-2012);
 - *Head of Compliance & Procedure* PT Bank QNB Indonesia Tbk (2012-2017);
 - *Core Team* of PT Asuransi Candi Utama establishment (2018-2019);
 - *Head of Legal Compliance AML & Corporate Secretary* PT Asuransi Candi Utama (2020-2023); and
 - *Head of Compliance & System and Procedure* Division of Bank Victoria (2023).

- Certification**
- *Compliance Manager Certification* (CPM) from the Indonesian Bankers Association (2016);
 - *Assessor Certification* from Certification of Banking Profession (2017);
 - *Level 4 Risk Management Certification* from Certification of Banking Profession (2019); and
 - *Risk Management Certification - Qualified Chief Risk Officer* from the Professional Certification Institute - Mitra Kalyana Sejahtera (2022).

Affiliation Relationship
Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

Laporan Singkat Pelaksanaan Kegiatan Fungsi Kepatuhan Tahun 2023

Selama tahun 2023, Fungsi Kepatuhan telah melaksanakan program kerja sebagai berikut:

1. Menyusun (baru/penginian) kebijakan dan prosedur sesuai regulasi yang berlaku;
2. Memonitor dan melakukan tindak lanjut atas hasil pemeriksaan Otoritas Jasa Keuangan sesuai target *date*;
3. Menjadi penghubung antara Bank dengan Otoritas Jasa Keuangan;
4. Melakukan kajian dari sisi regulasi atas proposal kredit di atas nilai tertentu;
5. Melakukan kajian kepatuhan dari sisi regulasi atas produk dan/atau aktivitas baru;
6. Melakukan Sosialisasi Peraturan Otoritas Jasa Keuangan/Surat Edaran Otoritas Jasa Keuangan/Peraturan Bank Indonesia/Peraturan Anggota Dewan Gubernur baru, serta kebijakan dan SOP Bank, baik secara *online* maupun *offline*;
7. Membentuk *Compliance Champion* pada setiap divisi dan cabang guna meningkatkan aspek kepatuhan pada seluruh lini;
8. Mengirimkan pengingat kepada unit kerja terkait atas kewajiban pelaporan triwulan, semester, dan tahunan kepada unit kerja terkait;
9. Mengisi topik terkait GCG dan regulasi pada media rapat budaya yang dilaksanakan Bank secara berkala; dan
10. Mengikuti pelatihan baik secara *online* maupun *offline* untuk terus meningkatkan kemampuan.

Pelatihan dan/atau Peningkatan Fungsi Kepatuhan

Selama tahun 2023, Fungsi Kepatuhan telah mengikuti pelatihan dan/atau peningkatan kompetensi sebagai berikut:

1. *Outlook* Industri Jasa Keuangan di Tahun 2023 (oleh Otoritas Jasa Keuangan Institute);
2. *Risk Based Audit Treasury* (oleh PT Kanatta Daya Indonesia);
3. *Tren Perbankan* di Tahun 2023 (oleh Otoritas Jasa Keuangan Institute);
4. Memperkuat Literasi dan Inklusi Keuangan Syariah (oleh Otoritas Jasa Keuangan Institute);
5. *Launching* Buku *Market Code of Conduct Edisi 4 Confirmation* (oleh Bank Indonesia);
6. Pencegahan, Pendeteksian dan Pengendalian *Fraud* (oleh *Vice President Fraud Investigation Head* PT Bank BTPN Tbk);
7. *Principles of Fairnes, Ethics Accountability and Tranparency* (FEAT) and *Veritas to Translate* FEAT into *Practice* (oleh Monetary Authority of Singapore);

Brief Report on Implementation of Compliance Function's Activities in 2023

In 2023, the Compliance Function implemented the following work programs:

1. Drafting (new/updated) policies and procedures in accordance with applicable regulations;
2. Monitoring and following up on Financial Services Authority inspection results within the target date;
3. Acting as a liaison between the Bank and the Financial Services Authority;
4. Conducting regulatory reviews of credit proposals above a certain threshold;
5. Conducting compliance reviews from a regulatory perspective on new products and/or activities;
6. Conducting Socialization of Financial Services Authority Regulations/Financial Services Authority Circular Letters/Bank Indonesia Regulations/New Board of Governors Member Regulations, as well as Bank policies and SOPs, both online and offline;
7. Establishing Compliance Champions in each division and branch to enhance compliance aspects across the board;
8. Sending reminders to relevant work units regarding quarterly, semi-annual, and annual reporting obligations to the respective work units;
9. Addressing topics related to GCG and regulations at the Bank's periodic cultural meetings;
10. Participating in training sessions, both online and offline, to continually enhance skills.

Compliance Function's Training and/or Development Programs

Throughout 2023, the Compliance Function attended training and/or competency developments as follows:

1. *Financial Services Industry Outlook* in 2023 (by Financial Services Authority Institute);
2. *Risk Based Audit Treasury* (by PT Kanatta Daya Indonesia);
3. *Banking Trends* in 2023 (by Financial Services Authority Institute);
4. *Strengthening Sharia Financial Literacy and Inclusion* (by Financial Services Authority Institute);
5. *Launching* of *Market Code of Conduct 4th Edition Confirmation* Book (by Bank Indonesia);
6. *Fraud Prevention, Detection and Control* (by *Vice President Fraud Investigation Head* of PT Bank BTPN Tbk);
7. *Principles of Fairness, Ethics Accountability and Transparency* (FEAT) and *Veritas to Translate* FEAT into *Practice* (by the Monetary Authority of Singapore);

8. *Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR)* Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 dan Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 (oleh Risiko Manajemen Gagasan);
9. Sertifikasi Auditor Internal untuk Peningkatan Kecukupan/ Efektivitas Evaluasi *Governance, Risk, and Compliance* (oleh Perbanas Institute);
10. *Anti-Money Laundering in Digital Era: Lesson Learned from Selected Countries Time* (oleh Otoritas Jasa Keuangan Institute);
11. *Lesson Learned Kasus Silicon Valley Bank* (oleh Lembaga Pengembangan Perbankan Indonesia);
12. Mengatasi Tantangan dan Menghadapi Perubahan dalam Sektor Jasa Keuangan (oleh Otoritas Jasa Keuangan Institute);
13. *Refreshment Sertifikasi Manajemen Risiko: Risk in Digital World – Batch 4* (oleh PT Efektifpro Knowledge Source);
14. *Sharing Session GCG* (oleh Bapak Heru);
15. Membangun Keyakinan Nasabah Aset Digital dari Risiko Siber (oleh Otoritas Jasa Keuangan Institute);
16. *Bisnis Indonesia Green Economy Forum 2023 “Realizing Sustainable Growth through Green Economy Commitment* (oleh Bisnis Indonesia);
17. Penerapan *Cloud Computing* di Industri Jasa Keuangan (oleh Otoritas Jasa Keuangan Institute);
18. *How to Manage Climate Related Risk in Banking Industry* (oleh Otoritas Jasa Keuangan Institute);
19. Mengenal Lebih Jauh Pengaturan Undang-Undang P2SK dalam Rangka Penguatan Sektor Perbankan *Confirmation Keuangan* (oleh Otoritas Jasa Keuangan Institute);
20. *ASEAN Market Capital Forum and International Sustainability Standards Boards Join Conference and Technical Training on the International Financial Reporting Standards Sustainability Disclosure Standards* (oleh ASEAN Market Capital Forum and International Financial Reporting Standards);
21. Penerapan Undang-Undang Perlindungan Data Pribadi dan Tantangan Implementasinya (oleh Forum Komunikasi Direktur Kepatuhan Perbankan);
22. Penyampaian Informasi Penerbitan dan Sosialisasi Peraturan Bank Indonesia tentang Pinjaman Likuiditas Jangka Pendek bagi Bank Umum Konvensional (oleh Bank Indonesia);
23. Peluang Perdagangan Karbon dalam Upaya Dekarbonisasi (oleh Otoritas Jasa Keuangan Institute);
24. Waspada Modus Penipuan Gaya Baru (oleh Otoritas Jasa Keuangan Institute);
25. Sosialisasi Peraturan Bank Indonesia tentang Pelindungan Konsumen Bank Indonesia (oleh Bank Indonesia);
26. *Compliance Risk untuk Financial Technology* (oleh Lembaga Pengembangan Perbankan Indonesia);
8. *Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR)* Financial Services Authority Regulation No. 42/POJK.03/2015 and Financial Services Authority Regulation No. 50/POJK.03/2017 (by Risk Management Ideas);
9. Internal Auditor Certification to Improve the Adequacy/ Effectiveness of *Governance, Risk, and Compliance* Evaluation (by Perbanas Institute);
10. *Anti-Money Laundering in Digital Era: Lesson Learned from Selected Countries Time* (by Financial Services Authority Institute);
11. *Silicon Valley Bank Case Lesson Learned* (by Indonesian Banking Development Institute);
12. *Overcoming Challenges and Facing Changes in the Financial Services Sector* (by Financial Services Authority Institute);
13. *Risk Management Certification Refreshment: Risk in Digital World - Batch 4* (by PT Efektifpro Knowledge Source);
14. *GCG Sharing Session* (by Mr. Heru);
15. *Building Customer Confidence in Digital Assets from Cyber Risk* (by Financial Services Authority Institute);
16. *Bisnis Indonesia Green Economy Forum 2023 “Realizing Sustainable Growth through Green Economy Commitment* (by Bisnis Indonesia);
17. *Application of Cloud Computing in the Financial Services Industry* (by Financial Services Authority Institute);
18. *How to Manage Climate Related Risk in Banking Industry* (by Financial Services Authority Institute);
19. *Getting to Know More about the P2SK Law Arrangement in the Framework of Strengthening the Financial Confirmation Banking Sector* (by Financial Services Authority Institute);
20. *ASEAN Market Capital Forum and International Sustainability Standards Boards Join Conference and Technical Training on the International Financial Reporting Standards Sustainability Disclosure Standards* (by ASEAN Market Capital Forum and International Financial Reporting Standards);
21. *Implementation of the Personal Data Protection Law and its Implementation Challenges* (by the Banking Compliance Director Communication Forum);
22. *Submission of Information on the Issuance and Socialization of Bank Indonesia Regulation on Short-Term Liquidity Loans for Conventional Commercial Banks* (by Bank Indonesia);
23. *Carbon Trading Opportunities in Decarbonization Efforts* (by Financial Services Authority Institute);
24. *Beware of New Style Fraud Modes* (by Financial Services Authority Institute);
25. *Socialization of Bank Indonesia Regulation on Bank Indonesia Consumer Protection* (by Bank Indonesia);
26. *Compliance Risk for Financial Technology* (by Indonesian Banking Development Institute);

27. Meningkatkan Efektivitas Sinergi Kerja Fungsi SKAI, Fungsi Kepatuhan dan Fungsi Manajemen Risiko (oleh Training Center Equivalent);
28. *Compliance Refreshment* Pemenuhan Kewajiban oleh Perusahaan Terdaftar (oleh Otoritas Jasa Keuangan dan Bursa Efek Indonesia);
29. *Leadership in Changing Atmosphere* (oleh Otoritas Jasa Keuangan Institute);
30. Efektivitas *Digital Maturity Assesment* dalam Mengukur Kematangan Transformasi Digital Perbankan (oleh Forum Komunikasi Direktur Kepatuhan Perbankan);
31. *Enhancing Financial Performance through Data Analytics* (oleh Otoritas Jasa Keuangan Institute dan The London Institute of Banking and Finance);
32. Pemanfaatan *Internet of Things (IoT)* di Industri Jasa Keuangan (oleh Otoritas Jasa Keuangan Institute);
33. *Refreshment* Pencegahan Tindak Pidana Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana);
34. Peluang dan Tantangan *Financial Technology P2P Lending* di Era Undang-Undang P2SK (oleh Otoritas Jasa Keuangan Institute);
35. *Managing Environmental, Social and Governance Risk and Opportunities* (oleh Otoritas Jasa Keuangan Institute dan The London Institute of Banking and Finance);
36. Kunci Sukses Menciptakan Talenta Profesional di Sektor Jasa Keuangan (oleh Otoritas Jasa Keuangan Institute);
37. *How to Drive Corporate Performance through Accounting Practices* (oleh Otoritas Jasa Keuangan Institute);
38. Mengetahui Lebih Jauh Pengaturan Undang-Undang P2SK dalam Rangka Penguatan Literasi, Inklusi, dan Pelindungan Konsumen (oleh Otoritas Jasa Keuangan Institute);
39. *Enhancing Environmental, Social, and Governance Through Best Practices in Accounting* (oleh Otoritas Jasa Keuangan Institute);
40. Optimalisasi Potensi dan Tingkatkan Kinerja di Era Digital (oleh Otoritas Jasa Keuangan Institute);
41. Menyambut Aset Kripto dalam Penguatan Ekosistem Keuangan Digital di Indonesia (oleh Otoritas Jasa Keuangan Institute);
42. Menyongsong Tantangan dan Peluang Industri Asuransi di 2024 (oleh Lembaga Pengembangan Perbankan Indonesia);
43. *Anti Fraud Management for Leaders Batch 2* (oleh PT Kanatta Daya Indonesia);
44. *Expert Sharing Session - Keuangan Berkelanjutan* (oleh Otoritas Jasa Keuangan Institute);
45. *Induction Training Program* (oleh Bank Victoria); dan
46. Aspek Hukum dan Dokumen Pembukaan Rekening Perusahaan (oleh Bank Victoria).

Pengadaan Barang dan Jasa [POJK F.1] **Procurement of Goods and Services**

Bank Victoria telah menetapkan kebijakan pengadaan barang dan jasa sebagai panduan bagi pelaksanaan pembelian yang dibutuhkan oleh unit kerja guna mendukung operasional dan pelayanan nasabah. Bank dapat mengalihdayakan sebagian pekerjaan penunjang ke pihak lain yang merupakan perusahaan penyedia jasa. Bank berkomitmen untuk menerapkan proses pengadaan barang/jasa secara transparan dan objektif, memastikan bahwa semua rekanan diperlakukan dengan adil, dan melarang praktik-praktik tidak etis dalam proses pengadaan.

Etika Pengadaan Barang dan Jasa

Etika dalam aktivitas pengadaan barang dan/atau jasa di Bank Victoria diatur oleh Keputusan Direksi No. 001/SK-DIR/01/21 tanggal 11 Januari 2021 tentang Pedoman Kode Etik Perilaku Karyawan PT Bank Victoria International Tbk. Pedoman ini memastikan bahwa hubungan antara karyawan dengan rekanan atau calon rekanan selama kegiatan pengadaan barang dan/atau jasa mematuhi beberapa hal berikut:

1. Tidak menerima tips atau mencari pengadaan berdasarkan keuntungan pribadi semata;
2. Transparansi;
3. Mencari penawaran terbaik;
4. Tidak terdapat *conflict of interest*; dan
5. Vendor harus mengikuti peraturan terkait pengadaan barang dan jasa yang berlaku di Bank Victoria.

Pengadaan Barang dan Jasa Tahun 2023

Pada tahun 2023, realisasi biaya pengadaan barang dan jasa Bank sebesar Rp73.780.368.236,- dengan kegiatan pengadaan barang dan jasa sebanyak 13 (tiga belas) kegiatan.

Bank Victoria established a policy on procurement of goods and services as a guide for purchasing those required by work units to support operations and customer services. The Bank may outsource part of its supporting works to other parties who are in the business of providing such service. The Bank is committed to implementing a transparent and objective procurement process for goods/services, ensuring that all partners are treated fairly, and prohibiting unethical practices in the procurement process.

Ethics of Procurement of Goods and Services

Ethics in the procurement of goods and/or services at Bank Victoria is regulated by 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. This conduct ensures that the employee's relationship with partner or prospective partner during the procurement activities of goods and/or services complies with the following matters:

1. Do not accept tips or seek procurement based on personal interest;
2. Transparency;
3. Look for the best deals;
4. No conflict of interest; and
5. Vendors must follow the regulations regarding the procurement of goods and services applicable at Bank Victoria.

Procurement of Goods and Services in 2023

In 2023, the realization of the Bank's cost of procurement of goods and services reached Rp73,780,368,236.- a total of 13 (thirteen) procurements of goods and services.

Perkara Hukum Legal Cases

Pada tahun 2023, perkara hukum yang dihadapi Bank, Dewan Komisaris, dan Direksi Bank Victoria ditunjukkan sebagai berikut:

In 2023, the legal cases faced by the Bank, Board of Commissioners, and Board of Directors of Bank Victoria were shown as follows:

Perkara Hukum Legal Cases	Perdata Civil	Pidana Criminal	Tata Usaha Negara State Administration
BANK VICTORIA			
Telah Selesai (Mempunyai Kekuatan Hukum yang Tetap) Settled (Final and Binding)	2	-	-
Dalam Proses Penyelesaian In Settlement Process	11	-	-
DEWAN KOMISARIS DAN DIREKSI BANK VICTORIA BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS OF BANK VICTORIA			
Telah Selesai (Mempunyai Kekuatan Hukum yang Tetap) Settled (Final and Binding)	-	-	-
Dalam Proses Penyelesaian In Settlement Process	-	-	-
Total	13	-	-

Perkara Hukum yang Dihadapi Bank Victoria Tahun 2023 Legal Cases Faced by Bank Victoria in 2023

Perkara / Case No. 948/Pdt.G/2021/PN.Jkt.Sel		Perkara / Case No. 226/PDT/2023/PT.DKI jo. No. 604/Pdt.G/2021/PN.Jkt.Sel	
Para Pihak Parties	Penggugat : PT Virgo Sari dan Dra. Dewi Eka Arini Tergugat: Bank Victoria; Drs. Anis Adwani, MBA; Kantor Pelayanan Kekayaan Negara dan Lelang Bogor; Suwarni Sukiman, SH; Kantor Badan Pertanahan Nasional Kabupaten Bogor; dan Fildzah, SH, LLM Plaintiff: PT Virgo Sari and Dra. Dewi Eka Arini Defendants: Bank Victoria; Drs. Anis Adwani, MBA; Bogor State Wealth and Auction Service Office; Suwarni Sukiman, SH; Bogor District National Land Agency Office; and Fildzah, SH, LLM.	Para Pihak Parties	Pemohon Kasasi: Bank Victoria Termohon Kasasi: PT Iswara Dewata Cassation Petitioner: Bank Victoria Defendant for Cassation: PT Iswara Dewata
Pokok Perkara Case Profile	Gugatan Perbuatan Melawan Hukum Wrongful Act Lawsuit	Pokok Perkara Case Profile	Gugatan Wanprestasi Default Lawsuit
Nilai Nominal Gugatan Nominal Value of Claim	Materiel: Material: Rp5,000,000,000	Nilai Nominal Gugatan Nominal Value of Claim	Materiel: Material: · Rp219,483,844,757 · USD11,600,000 Immateriel: Immaterial: · USD347,238,225 · USD201,448,632

Status Penyelesaian Perkara Case Settlement Status	Berkekuatan Hukum Tetap Permanent Legal Force	Status Penyelesaian Perkara Case Settlement Status	Dalam Proses di Mahkamah Agung Republik Indonesia In Process at the Supreme Court of the Republic of Indonesia
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Tidak Ada None	Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum Ada None yet
Sanksi Administrasi Administrative Sanctions	Tidak Ada None	Sanksi Administrasi Administrative Sanctions	Belum Ada None yet

Perkara / Case No. 193/PDT/2023/PT.DKI jo. No. 977/Pdt.G/PLW/2018/ PN.Jkt.Sel		Perkara / Case No. 645/Pdt.G/2021/PN.Jkt.Pst	
Para Pihak Parties	Pemohon Kasasi: Bank Victoria Termohon Kasasi: Podo Wibowo WH, Neneg Naldy, Haryono Eddyarto, H. Naldy Nazar Haroen, Eddy Rinaldy, PT Bank Harda Internasional Tbk, dan Kantor Badan Pertanahan Nasional Kota Jakarta Selatan Cassation Petitioner: Bank Victoria Defendant for Cassation: Podo Wibowo WH, Neneg Naldy, Haryono Eddyarto, H. Naldy Nazar Haroen, Eddy Rinaldy, PT Bank Harda Internasional Tbk, and the National Land Agency Office of South Jakarta City.	Para Pihak Parties	Pembanding: Edric Novidiyanto dan Fenny Terbanding: Bank Victoria Turut Terbanding: Tim Kurator PT Danau Winata Indah (Dalam Pailit); Notaris Budiman Cornelius Santiago Hutapea, SH; Notaris Suwarni Sukiman, SH; dan Bank Victoria Kantor Kas Grand Boutique Appellant: Edric Novidiyanto and Fenny Appellee: Bank Victoria Co- Appellee: Curator Team of PT Danau Winata Indah (In Bankruptcy); Notary Budiman Cornelius Santiago Hutapea, SH; Notary Suwarni Sukiman, SH; and Bank Victoria Grand Boutique Cash Office.
Pokok Perkara Case Profile	Gugatan Perlawanan Pihak Ketiga Third Party Counter Claim	Pokok Perkara Case Profile	Gugatan Perbuatan Melawan Hukum Third Party Counter Claim
Nilai Nominal Gugatan Nominal Value of Claim	Tidak Ada None	Nilai Nominal Gugatan Nominal Value of Claim	Materiel: Material: · Rp223,352,215 · Rp160,804,774 Imateriel: Immaterial: Rp10,000,000,000
Status Penyelesaian Perkara Case Settlement Status	Dalam Proses di Mahkamah Agung Republik Indonesia In Process at the Supreme Court of the Republic of Indonesia	Status Penyelesaian Perkara Case Settlement Status	Dalam Proses di Pengadilan Tinggi DKI Jakarta In Process at DKI Jakarta High Court
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum Ada None yet	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	Sanksi Administrasi Administrative Sanctions	Belum Ada None yet

Perkara / Case No. 390/Pdt.G/2022/PN.Jkt.Sel		Perkara / Case No. 1150/Pdt.G/2022/PN.Jkt.Sel	
Para Pihak Parties	<p>Pembanding: Shierly</p> <p>Terbanding: Ir. Adji Waseso Hamid, Luche Waseso Hamid, dan Trah Nugrahyang</p> <p>Turut Terbanding: Rahmadany Firmansyah, SH; Redho Junaidi, SH, MH; Oktavian Adhar, SH; Nawang Andi Kusuma, SH, MKn; Ety Purwaningsih, SH; Hartanti Kuntoro, SH; Bank Victoria; dan Kantor Pertanahan Kota Administrasi Jakarta Selatan</p> <p>Appellant: Shierly</p> <p>Appellee: Ir. Adji Waseso Hamid, Luche Waseso Hamid, and Trah Nugrahyang</p> <p>Co- Appellee: Rahmadany Firmansyah, SH; Redho Junaidi, SH, MH; Oktavian Adhar, SH; Nawang Andi Kusuma, SH, MKn; Ety Purwaningsih, SH; Hartanti Kuntoro, SH; Bank Victoria; and Land Office of South Jakarta Administrative City.</p>	Para Pihak Parties	<p>Penggugat: Plaintiff: PT Surya Eden Utama</p> <p>Tergugat: Defendant: Bank Victoria</p>
Pokok Perkara Case Profile	Gugatan Perbuatan Melawan Hukum Wrongful Acts Lawsuit	Pokok Perkara Case Profile	Gugatan Perbuatan Melawan Hukum Wrongful Acts Lawsuit
Nilai Nominal Gugatan Nominal Value of Claim	<p>Materiel: Rp5,000,000,000</p> <p>Imateriel: Rp2,000,000,000</p>	Nilai Nominal Gugatan Nominal Value of Claim	<p>Materiel: Material: Rp45,000,000,000</p> <p>Imateriel: Immaterial: Rp50,000,000,000</p>
Status Penyelesaian Perkara Case Settlement Status	Dalam Proses di Pengadilan Tinggi DKI Jakarta In Process at DKI Jakarta High Court	Status Penyelesaian Perkara Case Settlement Status	Dalam Proses di Pengadilan Negeri Jakarta Selatan In Process at South Jakarta High Court
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum Ada None Yet	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	Sanksi Administrasi Administrative Sanctions	Belum Ada None Yet

Perkara / Case No. 22/Pdt.G/2023/PN.Cjr		Perkara / Case No. 767/Pdt.G/2022/PN.Jkt.Pst	
Para Pihak Parties	<p>Penggugat: PT Haji Putra Indonesia</p> <p>Tergugat: PT Surya Eden Utama</p> <p>Turut Tergugat I: Bank Victoria dan Badan Pertanahan Nasional Kabupaten Cianjur</p> <p>Plaintiff: PT Haji Putra Indonesia</p> <p>Defendant: PT Surya Eden Utama</p> <p>Co-Defendant I: Bank Victoria and National Land Agency of Cianjur Regency</p>	Para Pihak Parties	<p>Penggugat: PT Favorite Sinar Pelangi</p> <p>Tergugat: Bank Victoria Cabang Bandung, Bank Victoria Kantor Pusat, PT Wahana Mutiara Pratama, dan Notaris Surjadi Jasi, SH</p> <p>Turut Tergugat I: Badan Pertanahan Nasional Kotamadya Bandung, Otoritas Jasa Keuangan Jakarta, dan Bank Indonesia, Jakarta</p> <p>Plaintiff: PT Favorite Sinar Pelangi</p> <p>Defendants: Bank Victoria Bandung Branch, Bank Victoria Head Office, PT Wahana Mutiara Pratama, and Notary Surjadi Jasi, SH.</p> <p>Co-Defendant I: National Land Agency of Bandung Municipality, Financial Services Authority Jakarta, and Bank Indonesia, Jakarta.</p>
Pokok Perkara Case Profile	Gugatan Wanprestasi Default Lawsuit	Pokok Perkara Case Profile	Gugatan Perbuatan Melawan Hukum Wrongful Acts Lawsuit
Nilai Nominal Gugatan Nominal Value of Claim	Materiel: Material: Rp6,000,000,000	Nilai Nominal Gugatan Nominal Value of Claim	Materiel: Material: Rp10,599,178,000 Imateriel: Immaterial: Rp560,000,000.000
Status Penyelesaian Perkara Case Settlement Status	Dalam Proses di pengadilan Negeri Cianjur In Process at Cianjur District Court	Status Penyelesaian Perkara Case Settlement Status	Berkekuatan Hukum Tetap Permanent Legal Force
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum Ada None yet	Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Tidak Ada None yet
Sanksi Administrasi Administrative Sanctions	Belum Ada None yet	Sanksi Administrasi Administrative Sanctions	Tidak Ada None yet

Perkara / Case No. 156/Pdt.G/2023/PN.Jkt.Pst		Perkara / Case No. 826/Pdt.G/2023/PN.Jkt.Sel	
Para Pihak Parties	<p>Pembanding: Sucik Mardi</p> <p>Terbanding: Bank Victoria Kantor Cabang Tanjung Duren dan Kantor Pelayanan Kekayaan Negara dan Lelang Jakarta III</p> <p>Appellant: Sucik Mardi</p> <p>Appellee: Bank Victoria Tanjung Duren Branch Office and Jakarta State Wealth and Auction Service Office III</p>	Para Pihak Parties	<p>Penggugat: Firzia Resita</p> <p>Tergugat: Bank Victoria, Kantor Pelayanan Kekayaan Negara dan Lelang Tangerang II, dan PT Matador Lelang Suskes</p> <p>Turut Tergugat: Badan Pertanahan Nasional Kota Tangerang Selatan</p> <p>Plaintiff: Firzia Resita</p> <p>Defendants: Bank Victoria, Tangerang II State Wealth and Auction Service Office, and PT Matador Lelang Suskes.</p> <p>Co-Defendants: National Land Agency of South Tangerang City</p>



Pokok Perkara Case Profile	Gugatan Perbuatan Melawan Hukum Wrongful Acts Lawsuit	Pokok Perkara Case Profile	Gugatan Perlawanan Eksekusi/Lelang Lawsuit Against Execution/Auction
Nilai Nominal Gugatan Nominal Value of Claim	Mengurangi Pokok Kredit: Reduce Principal Credit: Rp1,000,000,000 Keringanan Angsuran: Installment Relief: Rp1.000.000,- bulan/month	Nilai Nominal Gugatan Nominal Value of Claim	Materiel: Material: Rp2,400,000,000
Status Penyelesaian Perkara Case Settlement Status	Dalam Proses di Pengadilan Tinggi DKI Jakarta In Process at DKI Jakarta High Court	Status Penyelesaian Perkara Case Settlement Status	Dalam Proses di Pengadilan Negeri Jakarta In Process at Jakarta District Court
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum Ada None yet	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	Sanksi Administrasi Administrative Sanctions	Belum Ada None yet

Perkara / Case No. 434/Pdt.G/2022/PN.Jkt.Pst		Perkara / Case No. 409/Pdt.G/2023/PN.Jkt.Sel	
Para Pihak Parties	Pembanding: Yayasan Pendidikan Kader Keuangan dan Perbankan Bandung, Riska Nurasyiah, dan Rinalwan Buchari, MBA Terbanding: Bank Victoria dan PT Corex Intek Indonesia Appellants: Yayasan Pendidikan Kader Keuangan dan Perbankan Bandung, Riska Nurasyiah, and Rinalwan Buchari, MBA Appellee: Bank Victoria and PT Corex Intek Indonesia	Para Pihak Parties	Penggugat: Stevany Sulisty, Selviana Sulisty, Benny Sulisty, dan Elisa K Sulisty Tergugat: Bank Victoria dan PT Jtrust Investments Indonesia Turut Tergugat: Indriyani Damayanti Siregar, SH; Eliwaty Tjittra, SH; dan Bayu Rushadian Utama, SH, MKn Plaintiffs: Stevany Sulisty, Selviana Sulisty, Benny Sulisty, and Elisa K Sulisty. Defendants: Bank Victoria and PT Jtrust Investments Indonesia Co-Defendants: Indriyani Damayanti Siregar, SH; Eliwaty Tjittra, SH; and Bayu Rushadian Utama, SH, MKn
Pokok Perkara Case Profile	Gugatan Perbuatan Melawan Hukum Wrongful Acts Lawsuit	Pokok Perkara Case Profile	Gugatan Perbuatan Melawan Hukum Wrongful Acts Lawsuit
Nilai Nominal Gugatan Nominal Value of Claim	Materiel: Material: Rp6,077,079,809 Imateriel: Immaterial: Rp1,000,000,000	Nilai Nominal Gugatan Nominal Value of Claim	Materiel: Material: Rp750,000,000 Imateriel: Immaterial: Rp10,000,000,000
Status Penyelesaian Perkara Case Settlement Status	Dalam Proses di Pengadilan Tinggi DKI Jakarta In Process at DKI Jakarta High Court	Status Penyelesaian Perkara Case Settlement Status	Dalam Proses di Pengadilan Negeri Jakarta Selatan In Process at South Jakarta District Court
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum Ada None yet	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	Sanksi Administrasi Administrative Sanctions	Belum Ada None yet

Perkara / Case No. 1325/Pdt.G/2023/PN.Jkt.Sby	
Para Pihak Parties	Penggugat: Plaintiff: PT Mas Murni Indonesia Tbk Tergugat: Defendant: Bank Victoria Turut Tergugat: PT Tunas Unggul Lestari, Kantor Pertanahan Kota Surabaya I, dan Kantor Pelayanan Kekayaan Negara dan Lelang Surabaya Co-Defendants: PT Tunas Unggul Lestari, Surabaya City Land Office I, and Surabaya State Wealth and Auction Service Office
Pokok Perkara Case Profile	Gugatan Perbuatan Melawan Hukum Wrongful Acts Lawsuit
Nilai Nominal Gugatan Nominal Value of Claim	Materiel dan Imateriel: Material dan Immaterial: Rp1,000,000,000
Status Penyelesaian Perkara Case Settlement Status	Dalam Proses di Pengadilan Negeri Surabaya In Process at Surabaya 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 Dewan Komisaris dan Direksi Tahun 2023

Sepanjang tahun 2023, tidak terdapat perkara penting yang sedang dihadapi oleh Dewan Komisaris dan Direksi yang sedang menjabat pada Bank Victoria.

Cases Faced by the Board of Commissioners and Board of Directors on 2023

Throughout 2023, there were no significant cases faced by the current member of Board of Commissioners and Board of Directors of Bank Victoria.

Sanksi Administratif Tahun 2023

Administrative Sanctions in 2023

Penerima Sanksi Sanctioned Party	Jenis Sanksi Types of Sanction	Otoritas Pemberi Sanksi Sanctioning Authority	Total (Rp)
Bank Victoria	Sanksi Finansial Financial Sanctions	Bank Indonesia	2,300,000
Dewan Komisaris Board of Commissioners	-	-	-
Direksi Board of Directors	-	-	-

Program Anti Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal [POJK F.1]

Anti Money Laundering, Counter Financing of Terrorism, and Counter-Proliferation Financing of Weapons of Mass Destruction Program

Bank memiliki peran kunci dalam mencegah Tindak Pidana Pencucian Uang (TPPU), Tindak Pidana Terorisme (TPPT), dan Tindak Pidana Pendanaan Proliferasi Senjata Pemusnah Massal (TPPPSPM) melalui program Anti Pencucian Uang (APU), Pencegahan Pendanaan Terorisme (PPT), dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM) yang berbasis risiko, serta melalui pelaporan kewajiban kepada Pusat Pelaporan dan Analisis Transaksi Keuangan (PPATK) sebagai *Financial Intelligence Unit* (FIU). Untuk meningkatkan kualitas implementasi program APU, PPT, dan PPSPM, Bank melakukan langkah sebagai berikut:

1. Pengawasan Aktif Direksi dan Dewan Komisaris terhadap Program APU, PPT, dan PPSPM

Direksi Bank memastikan efektivitas penerapan Prinsip APU, PPT, dan PPSPM melalui:

- a. Mengusulkan kebijakan dan prosedur tertulis mengenai penerapan program APU, PPT, dan PPSPM kepada Dewan Komisaris;
- b. Memastikan penerapan program APU, PPT, dan PPSPM dilaksanakan sesuai dengan kebijakan dan prosedur tertulis yang telah ditetapkan;
- c. Membentuk unit kerja khusus dan/atau menunjuk pejabat yang bertanggung jawab terhadap penerapan program APU, PPT, dan PPSPM;
- d. Melakukan pengawasan atas kepatuhan unit kerja dalam menerapkan program APU, PPT, dan PPSPM;
- e. Memastikan bahwa kebijakan dan prosedur tertulis mengenai penerapan program APU, PPT, dan PPSPM sejalan dengan perubahan dan pengembangan produk, jasa, dan teknologi di sektor jasa keuangan serta sesuai dengan perkembangan modus TPPU, TPPT, dan/atau PPSPM;
- f. Memastikan pejabat dan/atau pegawai, khususnya pegawai dari satuan kerja terkait dan pegawai baru, telah mengikuti pelatihan yang berkaitan dengan penerapan program APU, PPT, dan PPSPM sebanyak 1 (satu) kali dalam 1 (satu) tahun; dan
- g. Memastikan adanya pembahasan terkait penerapan program APU, PPT, dan PPSPM dalam rapat Direksi.

Dewan Komisaris bertanggung jawab untuk:

- a. Memastikan Bank memiliki kebijakan dan prosedur penerapan program APU, PPT, dan PPSPM;

The Bank plays a crucial role in preventing Money Laundering (TPPU), Terrorism Financing (TPPT), and Proliferation of Weapons of Mass Destruction Financing (TPPPSPM) through risk-based Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), and Counter-Proliferation of Weapons of Mass Destruction Financing (CPF) programs and mandatory reporting to the Financial Transaction Reports and Analysis Center (PPATK) as the Financial Intelligence Unit (FIU). To enhance the quality of the implementation of the AML, CTF, and CPF programs, the Bank takes the following steps:

1. Active Supervision by the Board of Directors and the Board of Commissioners of the AML, CTF, and CPF programs.

The Bank's Board of Directors ensures the effective implementation of the AML, CTF, and CPF principles through the following measures:

- a. Proposing written policies and procedures for the implementation of the AML, CTF, and CPF programs to the Board of Commissioners;
- b. Ensuring that the implementation of the AML, CTF, and CPF programs is carried out in accordance with the established written policies and procedures;
- c. Establishing a specialized work unit and/or appointing officials in charge of the implementation of the AML, CTF, and CPF programs;
- d. Supervising the compliance of work units in implementing the AML, CTF, and CPF programs;
- e. Ensuring that the written policies and procedures for the implementation of the AML, CTF, and CPF programs align with changes and developments in products, services, and technology in the financial services sector, as well as with the evolving modes of TPPU, TPPT, and/or PPSPM;
- f. Ensuring that officials and/or employees, especially those from relevant work units and new employees, have attended training related to the implementation of the AML, CTF, and CPF programs at least once a year; and
- g. Ensuring that discussions related to the implementation of the AML, CTF, and CPF programs are included in the Board of Directors' meetings.

The Board of Commissioners is responsible for:

- a. Ensuring that the Bank has policies and procedures for implementing AML, CTF, and CPF programs;

- b. Memberikan persetujuan atas kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM yang diusulkan oleh Direksi;
 - c. Melakukan evaluasi atas kebijakan dan prosedur Penerapan Program APU, PPT, dan PPPSPM;
 - d. Melakukan pengawasan atas pelaksanaan tanggung jawab Direksi terhadap penerapan program APU, PPT, dan PPPSPM; dan
 - e. Memastikan adanya pembahasan terkait penerapan program APU, PPT, dan PPPSPM dalam rapat Direksi dan Dewan Komisaris.
2. Kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM
- Bank telah memiliki kebijakan dan prosedur yang sejalan dan sesuai dengan peraturan perundang-undangan dan *best practices*, antara lain mencakup:
- a. Uji tuntas nasabah/*Customer Due Diligence (CDD)* dan/atau uji lanjut nasabah/*Enhance Due Diligence (EDD)* terhadap calon nasabah, nasabah, *conductor* dan *Walk in Customer (WIC)*, *Beneficial Owner (BO)*, dan *Politically Exposed Person (PEP)*;
 - b. Penghentian Sementara transaksi dan penundaan transaksi;
 - c. Penolakan transaksi dan penutupan hubungan usaha;
 - d. Pengelolaan risiko pencucian uang dan/atau pendanaan terorisme berdasarkan pendekatan berbasis risiko (*risk-based approach*) terkait nasabah, negara/area geografis, produk, jasa dan transaksi, serta jaringan distribusi (*delivery channels*);
 - e. Pemantauan dan pengkinian;
 - f. *Cross border correspondent banking*;
 - g. Transfer dana;
 - h. Penatausahaan dokumen; dan
 - i. Pelaporan dan sanksi.
3. Pengendalian internal yang efektif dalam penerapan APU, PPT, dan PPPSPM, antara lain dilakukan dengan:
- a. Memiliki kebijakan dan prosedur APU, PPT, dan PPPSPM serta pemantauan internal yang tepat;
 - b. Adanya batasan wewenang dan tanggung jawab yang jelas terhadap satuan kerja terkait dengan penerapan program APU, PPT, dan PPPSPM, baik melalui *first line of defense*, *second line of defense*, maupun *third line of defense*; dan
 - c. Melakukan pemeriksaan untuk memastikan efektivitas pelaksanaan program APU, PPT, dan PPPSPM oleh SKAI & Anti *Fraud*.
4. Sistem informasi manajemen
- Untuk mengoptimalkan pemantauan transaksi dalam pelaksanaan program APU, PPT, dan PPPSPM, Bank secara berkelanjutan mengembangkan teknologi sistem informasi, antara lain:
- a. Melakukan penyempurnaan sistem dan aplikasi pendukung untuk Laporan Transaksi Keuangan Tunai, Laporan Transfer Dana dari dan ke Luar Negeri, Laporan Transaksi Keuangan Mencurigakan, *Filtering*
- b. Approving the policies and procedures for implementing the AML, CTF, and CPF programs proposed by the Board of Directors;
 - c. Evaluating the policies and procedures for implementing the AML, CTF, and CPF programs;
 - d. Supervising the execution of the Board of Directors' responsibilities regarding the implementation of the AML, CTF, and CPF programs; and
 - e. Ensuring that discussions related to the implementation of the AML, CTF, and CPF programs are included in the Board of Directors and Board of Commissioners meetings
2. Policies and procedures for the implementation of AML, CTF, and CPF programs
- The Bank has established policies and procedures that align with laws and regulations and best practices, which include:
- a. Customer Due Diligence (CDD) and/or Enhanced Due Diligence (EDD) for prospective customers, customers, conductors and Walk-in Customers (WIC), Beneficial Owners (BO), and Politically Exposed Persons (PEP);
 - b. Temporary suspension and delay of transactions;
 - c. Rejection of transactions and termination of business relationships;
 - d. Management of money laundering and/or terrorism financing risks based on a risk-based approach concerning customers, geographical areas/countries, products, services and transactions, as well as delivery channels;
 - e. Monitoring and updating;
 - f. Cross-border correspondent banking;
 - g. Fund transfers;
 - h. Document administration; and
 - i. Reporting and sanctions.
3. Effective internal control in the implementation of AML, CTF, and CPF programs is achieved through the following measures:
- a. Establishing appropriate AML, CTF, and CPF policies and procedures, as well as proper internal monitoring;
 - b. Establishing clear limitations of authority and responsibility for the work units involved in the implementation of the AML, CTF, and CPF programs, whether through the first line of defense, second line of defense, or third line of defense; and
 - c. Conducting audits to ensure the effective implementation of the AML, CTF, and CPF programs. The audits are conducted by SKAI & Anti-Fraud.
4. Management information system
- To optimize transaction monitoring in the implementation of AML, CTF, and CPF programs, the Bank is continuously developing its information system technology by, among others:
- a. Refining the system and supporting applications for Cash Financial Transaction Reports, International Fund Transfer Reports, Suspicious Financial Transaction Reports, Filtering and Screening Terrorist (DTTOT List),

and Screening Terrorist (DTTOT List), PEP Screening Detection dan Customer Due Diligence (CDD) Risk Scoring dalam suatu sistem yaitu SmartAML. SmartAML digunakan untuk mendukung pelaksanaan *know your customer* yang lebih optimal, khususnya dalam pendeteksian/pemantauan transaksi nasabah yang memiliki pola perilaku dan pola transaksi pencucian uang dan pendanaan terorisme, serta pendanaan proliferasi senjata pemusnah massal;

- b. Mengembangkan aplikasi Sistem Terduga Pendanaan Terorisme (SIPENDAR) PPATK; dan
 - c. Mengembangkan aplikasi Sistem Informasi Pengguna Jasa Terpadu (SIPESAT) PPATK.
5. Sumber daya manusia dan pelatihan
Bank menyelenggarakan program pelatihan yang berkesinambungan dan berkala paling sedikit 1 (satu) kali dalam 1 (satu) tahun untuk memastikan sumber daya manusia memiliki pengetahuan yang memadai, terutama terkait APU, PPT, dan PPPSPM. Pelatihan mencakup penerapan peraturan perundang-undangan terkait, tipologi pencucian uang dan pendanaan terorisme, serta kebijakan dan prosedur internal program APU, PPT, dan PPPSPM beserta peran serta tanggung jawab karyawan dalam pencegahan pencucian uang, pendanaan terorisme, dan pendanaan proliferasi senjata pemusnah massal.

Pada tahun 2023, Bank melakukan penguatan program APU, PPT, dan PPPSPM untuk memitigasi risiko terjadinya TPPU, TPPT, dan TPPSPM melalui peningkatan kompetensi sumber daya manusia dan pelatihan serta *forum group discussion*. Selain itu, keandalan sistem pendukung penerapan program APU, PPT, dan PPPSPM dilakukan melalui sistem SmartAML. Bank juga terus melakukan *enhancement* sistem melalui adopsi teknologi baru yang fleksibel dan sejalan dengan aktivitas transaksi keuangan digital dan perkembangan Bank terkini.

Financial Integrity Rating on Money Laundering/Terrorism Financing (FIR on ML/TF)

Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF) merupakan penilaian terhadap integritas dan efektivitas pihak pelapor dalam menjalankan program APU dan PPT, khususnya dari aspek kinerja pelaporan APU, PPT, dan PPPSPM.

Pengukuran nilai FIR on ML/TF dilakukan terhadap 3 (tiga) dimensi, yaitu:

1. Dimensi 1 (satu) untuk mengukur tingkat komitmen pihak pelapor dalam mendukung PPATK dan aparat penegak hukum dalam penelusuran transaksi keuangan terkait indikasi TPPU dan TPPT;
2. Dimensi 2 (dua) untuk mengukur tingkat implementasi tata kelola pelaporan APU dan PPT yang dilakukan oleh pihak pelapor sesuai dengan ketentuan Lembaga Pengawas dan Pengatur (LPP) dan pedoman pelaporan dari PPATK; dan

PEP Screening Detection, and Customer Due Diligence (CDD) Risk Scoring within a system called SmartAML. SmartAML is used to support the optimal implementation of the “know your customer” process, particularly in detecting/monitoring customer transactions that exhibit patterns of money laundering, terrorism financing, and proliferation of weapons of mass destruction financing behavior;

- b. Developing PPATK’s Suspected Terrorism Financing Information System (SIPENDAR) application; and
 - c. Developing PPATK’s Integrated Service User Information System (SIPESAT) application.
5. Human resources and training
The Bank organizes regular and continuous training programs at least once a year to ensure that its human resources are adequately knowledgeable, especially in relation to AML, CTF, and CPF. The training covers the application of relevant laws and regulations, typologies of money laundering and terrorism financing, as well as internal policies and procedures of the AML, CTF, and CPF programs, along with the roles and responsibilities of employees in preventing money laundering, terrorism financing, and financing the proliferation of weapons of mass destruction.

In 2023, the Bank strengthened the AML, CTF, and CPF programs to mitigate the risk of TPPU, TPPT, and TPPSPM by enhancing the competence of human resources, conducting training, and organizing group discussion forums. Furthermore, the reliability of the system supporting the implementation of the AML, CTF, and CPF programs was ensured through the SmartAML system. The Bank also continuously enhanced the system by adopting new, flexible technology that aligns with digital financial transaction activities and the latest developments in the Bank.

Financial Integrity Rating on Money Laundering/Terrorism Financing (FIR on ML/TF)

The Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF) is an assessment of the integrity and effectiveness of the reporting party in implementing AML, CTF, and CPF programs, particularly from the aspect of AML, CTF, and CPF reporting performance.

The FIR on ML/TF value is measured across 3 (three) dimensions:

1. Dimension 1 (one) measures the commitment level of the reporting party in supporting PPATK and law enforcement agencies in tracing financial transactions related to indications of TPPU and TPPT;
2. Dimension 2 (two) measures the level of implementation of AML and CTF reporting governance carried out by the reporting party in accordance with the provisions of the Supervisory and Regulatory Bodies (LPP) and PPATK reporting guidelines; and

3. Dimensi 3 (tiga) untuk mengukur tingkat kepatuhan pihak pelapor terhadap kewajiban pelaporan APU dan PPT kepada PPATK serta kualitas formal dan materiel atas keseluruhan laporan yang telah disampaikan sesuai dengan peraturan PPATK.

Hasil FIR on ML/TF menjadi tolok ukur bagi PPATK dan LPP dalam merumuskan langkah-langkah pembinaan, pengawasan, dan pengaturan berbasis risiko, khususnya untuk penguatan sistem APU dan PPT di setiap pihak pelapor dan penguatan integritas sistem keuangan secara nasional.

Nilai FIR on ML/TF yang diperoleh Bank Victoria pada tahun 2023 sebesar 9,17 yang dikontribusikan oleh dimensi 1 (satu) sebesar 9,96, dimensi 2 (dua) sebesar 9,42, dan dimensi 3 (tiga) sebesar 8,77. Hal ini menunjukkan bahwa tingkat komitmen Bank Victoria dalam mendukung PPATK dan aparat penegak hukum untuk melakukan penelusuran transaksi keuangan terkait indikasi TPPU dan TPPT, tingkat implementasi tata kelola pelaporan APU dan PPT sesuai ketentuan LPP dan pedoman pelaporan PPATK, tingkat kepatuhan terhadap kewajiban pelaporan APU dan PPT kepada PPATK, serta kualitas laporan yang disampaikan masuk pada kategori Sangat Baik.

3. Dimension 3 (three) measures the compliance level of the reporting party with the obligation to report AML and CTF to PPATK and the formal and material quality of the overall reports submitted in accordance with PPATK regulations.

The FIR on ML/TF results serves as a benchmark for PPATK and LPP in formulating risk-based development, supervision, and regulation measures, especially for strengthening the AML and CTF systems in each reporting party and strengthening the integrity of the national financial system.

In 2023, Bank Victoria obtained an FIR on ML/TF value of 9.17, contributed by Dimension 1 (one) at 9.96, Dimension 2 (two) at 9.42, and Dimension 3 (three) at 8.77. This achievement indicates that Bank Victoria's commitment level in supporting PPATK and law enforcement agencies to trace financial transactions related to TPPU and TPPT indications, the level of implementation of AML and CTF reporting governance in accordance with LPP provisions and PPATK reporting guidelines, the compliance level with the obligation to report AML and CTF to PPATK, and the quality of the reports submitted are in the "Very Good" ("Sangat Baik") category.

Pemberian Dana Kegiatan Politik [POJK F.1] **Provision of Funds for Political Activities**

Kebijakan internal Bank melarang keterlibatan karyawan dalam kegiatan politik dan memberikan dana untuk tujuan politik. Kebijakan ini bertujuan menjaga independensi dan profesionalisme Bank serta karyawan. Pada tahun 2023, Bank Victoria tidak terlibat dalam kegiatan politik dan tidak memberikan dana untuk kepentingan politik.

The Bank's internal policy prohibits employee involvement in political activities nor providing funds for political purposes. This policy aims to maintain the independence and professionalism of the Bank and its employees. In 2023, Bank Victoria was not involved in political activities, nor did it provide funds for political purposes.

Persaingan Usaha yang Sehat [POJK F.1] **Fair Business Competition**

Dalam menjalankan kegiatan usaha, Bank Victoria menegakkan nilai etika dan moral, khususnya dalam praktik persaingan usaha yang sehat. Upaya yang dilakukan Bank meliputi kepatuhan terhadap Undang-Undang Anti Monopoli, melakukan riset pasar untuk memahami posisi pesaing, melakukan persaingan yang sehat dengan peningkatan produk dan layanan berkualitas, serta melindungi kepentingan nasabah dari praktik bisnis yang tidak sehat. Bank juga menghormati Hak Kekayaan Intelektual (HAKI) dengan mengajak seluruh jajaran manajemen dan karyawan untuk menghargai karya milik pihak lain, mendorong berpartisipasi aktif dalam pengembangan proses atau produk yang akan digunakan Bank, dan melindungi HAKI milik Bank.

In carrying out business activities, Bank Victoria upholds ethical and moral values, particularly in the practice of fair business competition. The Bank's efforts include compliance with the Anti Monopoly Law, conducting market research to understand competitors' positions, conducting fair competition by improving quality products and services, and protecting customer interests from unfair business practices. The Bank also respects Intellectual Property Rights (IPR) by inviting all levels of management and employees to respect the work of other parties, promoting active participation in the development of process or products that will be used by the Bank, and protecting the Bank's IPR.

Kode Etik [POJK F.1]

Code of Conduct

Bank Victoria menetapkan Kode Etik sebagai panduan wajib bagi semua insan Bank. Kode Etik Bank Victoria ditetapkan melalui Keputusan Direksi No. 024A/SK-DIR/02/23 tanggal 24 Februari 2023. Kode Etik harus diikuti dalam interaksi dengan nasabah, rekanan, dan sesama karyawan. Dengan mematuhi Kode Etik, diharapkan dapat mencegah hubungan yang tidak wajar antara nasabah, rekanan, atau sesama karyawan.

Bank Victoria established a Code of Conduct as a mandatory guide for all Bank personnel. Bank Victoria's Code of Conduct was established through the Board of Directors' Decision Letter No. 024A/SK-DIR/02/23 dated 24 February 2023. The Code of Conduct must be followed in interactions with customers, partners, and among employees. Compliance with the Code of Conduct is expected to prevent unfair relationships between customers, partners, or among employees.

Pokok Isi Kode Etik

Pokok-pokok Kode Etik Bank Victoria sebagai berikut:

1. Standar Etika Bisnis
 - a. Etika Bank dengan karyawan;
 - b. Etika Bank dengan nasabah;
 - c. Etika Bank dengan penyedia barang dan jasa (evaluasi yang objektif dalam pengadaan perlengkapan dan peralatan Bank);
 - d. Etika Bank dengan pesaing;
 - e. Etika Bank dengan pemerintah;
 - f. Etika Bank dengan masyarakat;
 - g. Etika Bank dengan media massa; dan
 - h. Etika Bank dengan organisasi profesi.
2. Standar Perilaku Karyawan
 - a. Tuntunan perilaku karyawan;
 - b. Penanganan benturan kepentingan;
 - c. Pedoman pemberian dan penerimaan hadiah dan donasi;
 - d. Pedoman kepatuhan terhadap peraturan;
 - e. Pedoman menjaga kerahasiaan data dan informasi perusahaan;
 - f. Pedoman aktivitas politik; dan
 - g. Pedoman pelaporan atas pelanggaran dan perlindungan pelapor.

Principles of Code of Conduct

The principles of Code of Conduct of Bank Victoria are as follows:

1. Standard Business Ethics
 - a. Bank's Ethics with employees;
 - b. Bank's Ethics with customers;
 - c. Bank's Ethics with provider of goods and services (objective evaluation in the procurement of the Bank's equipment and tools);
 - d. Bank's Ethics with competitors;
 - e. Bank's Ethics with the government;
 - f. Bank's Ethics with the communities;
 - g. Bank's Ethics with mass media; and
 - h. Bank's Ethics with professional organizations.
2. Standard Code of Conduct
 - a. Employee behavior guidelines;
 - b. Management of conflict of interest;
 - c. Guidelines for giving and receiving gifts and donations;
 - d. Regulatory compliance guidelines;
 - e. Guidelines for maintaining confidentiality of company data and information;
 - f. Political activity guidelines; and
 - g. Guidelines for reporting violations and protection of whistleblower.

Komitmen Kepatuhan terhadap Kode Etik

Bank Victoria komitmen untuk mematuhi Kode Etik sebagai standar etika tertinggi selain peraturan perundang-undangan. Semua pihak di Bank, termasuk Dewan Komisaris, Direksi, Pejabat Eksekutif, dan karyawan diwajibkan mematuhi Kode Etik dan menandatangani Surat Pernyataan yang dimuat pada halaman akhir Kode Etik.

Commitment to Complying with Code of Conduct

Bank Victoria is committed to complying with the Code of Conduct as the highest ethical standard in addition to the laws and regulations. All parties at the Bank, including the Board of Commissioners, Board of Directors, Executive Officials, and employees are required to adhere to the Code of Conduct and sign a Statement Letter set out in the final page of the Code of Conduct.

Penyebarluasan dan Sosialisasi Kode Etik

Upaya penyebarluasan dan sosialisasi Kode Etik melalui beberapa cara, yaitu:

1. Menyampaikan Kode Etik kepada seluruh karyawan melalui media internal yang dapat diakses setiap saat;
2. Menyampaikan etika bisnis secara berkala melalui memo atau surat dari Direksi atau Divisi terkait;
3. Mendistribusikan buku saku Kode Etik yang wajib dipelajari dan dilaksanakan oleh setiap karyawan; dan
4. Mengingatkan penerapan Kode Etik melalui pelatihan, induksi untuk karyawan baru, dan forum-forum pelatihan dengan melibatkan pihak eksternal.

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 & General Affair* bertanggung jawab atas penerapan Kode Etik di lingkungan 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 & General Affair* 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 & General Affair*.

Penegakan Pedoman Kode Etik

1. Setiap karyawan Bank harus melaporkan setiap fakta penyimpangan Pedoman Kode Etik Perilaku Karyawan kepada Divisi *Human Capital Management & General Affair* dan identitas pelapor akan dilindungi;
2. Divisi *Human Capital Management & General Affair* 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;

Circulation and Dissemination of Code of Conduct

The efforts to circulate and disseminate the Code of Conduct is carried out through several means, namely:

1. Disseminates the Code of Conduct to all employees through internal media accessible at any time;
2. Disseminates business ethics periodically through memos or letters from the Board of Directors or related Divisions;
3. Distributes the Code of Conduct pocket book that must be studied and carried out by every employee; and
4. Reminds the implementation of the Code of Conduct through training, induction training programs for new employees, and through training forums involving external parties.

Efforts to Implement and Enforce Code of Conduct

Organizational Implementation and Enforcement

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 & General Affair Division, is responsible for the implementation of Code of Conduct within the Bank;
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 & General Affair 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 respective person has read, understood, and agreed to comply with the Code of Conduct, which thereafter documented by the Human Capital Management & General Affair Division.

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 & General Affair Division and the identity of the whistleblower will be protected;
2. Human Capital Management & General Affair 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 decide 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. 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.

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.

Bentuk Pelanggaran dan Jenis Sanksi

Pelanggaran atau ketidakpatuhan terhadap Kode Etik akan dikenakan sanksi sesuai tingkat pelanggarannya. Pemberian sanksi akan disesuaikan dengan jenis dan keseriusan pelanggaran serta evaluasi individu yang melanggar yang diuraikan sebagai berikut:

1. Pelanggaran Ringan
 - a. Kejadian pertama, minimal teguran lisan dan maksimal surat peringatan pertama;
 - b. Kejadian kedua, minimal surat peringatan kedua dan maksimal surat peringatan ketiga; dan
 - c. Kejadian ketiga dan seterusnya minimal surat peringatan ketiga dan maksimal pengunduran diri.
2. Pelanggaran Sedang
 - a. Kejadian pertama minimal surat peringatan pertama dan maksimal surat peringatan kedua; dan
 - b. Kejadian kedua, minimal surat peringatan kedua dan maksimal pengunduran diri.
3. Pelanggaran Berat

Kejadian pertama, minimal tidak diberikan kenaikan gaji dan maksimal pengunduran diri.

Pemberian sanksi bagi karyawan yang melanggar Kode Etik juga 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.

Forms and Types of Sanction

Violation or non-compliance with the Code of Conduct will be subject to sanctions according to the violation level. The imposition of sanctions will be adjusted to the type and seriousness of the violation as well as the evaluation of the individual committed the violation, which is described as follows:

1. Minor Violation
 - a. First incident, verbal reprimand at minimum and first warning letter at maximum;
 - b. Second incident, second warning letter at minimum and third warning letter at maximum; and
 - c. Third incident and so on, third warning letter at minimum and resignation at maximum.
2. Moderate Violation
 - a. First incident, first warning letter at minimum and second warning letter at maximum; and
 - b. Second incident, second warning letter at minimum and resignation at maximum.
3. Severe Violation

First incident, no salary increments at minimum and resignation at maximum.

Employees committing violations will also 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.

Laporan Penyimpangan Internal Tahun 2023

Bentuk Pelanggaran Forms Violation	Surat Peringatan Warning Letter	Surat Teguran Reprimand Letter
Ringan / Minor	15	13
Sedang / Moderate	3	-
Berat / Severe	-	-
Total	18	13

Internal Deviation Report in 2023

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.

Program Kepemilikan Saham oleh Manajemen dan Karyawan Management/Employee Stock Ownership Program

Di tahun 2023, Bank Victoria tidak melaksanakan program kepemilikan saham oleh manajemen (MSOP) dan/atau program kepemilikan saham oleh karyawan (ESOP).

In 2023, Bank Victoria did not conduct a management stock ownership program (MSOP), and/or an employee stock ownership program (ESOP).

Kebijakan Pengungkapan Informasi Information Disclosure Policy

Anggota Dewan Komisaris dan Direksi wajib melaporkan kepemilikan dan perubahan kepemilikan saham Bank kepada Otoritas Jasa Keuangan sesuai Peraturan Otoritas Jasa Keuangan No. 11/POJK.04/2017. Laporan wajib disampaikan dalam waktu maksimal 10 (sepuluh) hari sejak terjadinya perubahan. Selain laporan kepada Otoritas Jasa Keuangan, anggota Dewan Komisaris dan Direksi juga harus memberikan informasi kepada Bank mengenai kepemilikan saham dan setiap perubahannya dalam waktu maksimal 3 (tiga) hari kerja setelah terjadinya perubahan.

Members of the Board of Commissioners and Board of Directors are required to submit report on their shareholding and changes on shareholding of the Bank to the Financial Services Authority in accordance with the Financial Services Authority Regulation No. 11/POJK.04/2017. Report is required to be submitted within a maximum of 10 (ten) days from the changes of shareholding. In addition to reporting to the Financial Services Authority, members of the Board of Commissioners and Board of Directors are also required to provide information to the Bank regarding their shareholding and changes on shareholding within a maximum of 3 (three) working days after the changes on shareholding.

Pengungkapan Kepemilikan Saham

Informasi kepemilikan saham Dewan Komisaris dan Direksi dapat dilihat pada bab Profil Perusahaan.

Disclosure of Share Ownership

Information on the Board of Commissioners and Board of Directors' shareholding can be seen in the Company Profile chapter.

Kebijakan Anti Korupsi [POJK F.1] Anti Corruption Policy

Bank Victoria memiliki kebijakan pencegahan korupsi yang tertuang dalam Keputusan Direksi No. 002/SK-DIR/08/20 tanggal 7 Agustus 2020 tentang Kebijakan dan Standar Operasional Prosedur Penerapan Strategi *Anti Fraud*. Implementasi kebijakan anti korupsi di Bank dilakukan melalui serangkaian kegiatan berikut:

Bank Victoria has a policy on preventing corruption as stated in 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. The Bank applies anti corruption policy through a series of the following activities:

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 memengaruhi 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.

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.

Sosialisasi Kebijakan Anti Korupsi

Sosialisasi kebijakan anti-korupsi Bank kepada seluruh karyawan dilakukan melalui berbagai kegiatan dan media internal. Hal ini bertujuan untuk meningkatkan kesadaran karyawan agar tidak terlibat dalam tindakan korupsi saat melaksanakan tugas dan tanggung jawabnya. Pada tahun 2023, Bank telah mengikutsertakan karyawan Bank dalam program pendidikan dan pelatihan terkait pelatihan/sosialisasi anti korupsi sebanyak 5 (lima) kali.

Dissemination of Anti Corruption Policy

Dissemination of the Bank's anti corruption policy to all employees is carried out through various activities and internal media. This aims to increase employee awareness so as not to be involved in acts of corruption when carrying out their duties and responsibilities. In 2023, the Bank has included Bank employees in education and training programs related to anti-corruption training/socialization 5 (five) times.

Pengendalian Gratifikasi [POJK F.1] Gratification Control

Bank Victoria memiliki kebijakan pengendalian gratifikasi yang diatur dalam Kode Etik, di mana Dewan Komisaris, Direksi, Pejabat Eksekutif, Pimpinan Kantor, seluruh karyawan Bank, dan anggota keluarganya tidak diizinkan menerima pemberian dari nasabah, baik secara langsung maupun tidak langsung. Kebijakan ini bertujuan meningkatkan akuntabilitas dan mempertahankan nilai perusahaan sebagai Bank yang bersih dari korupsi, kolusi, dan nepotisme.

Bank Victoria has a policy on gratification control regulated under the Code of Conduct, in which the Board of Commissioners, Board of Directors, Executive Officers, Office Heads, and all Bank employees, including their family members, are not permitted to receive any gratification from customers, either directly or indirectly. This policy aims to increase accountability and maintain the company's value as a Bank that is free from corruption, collusion, and nepotism.

Pengelolaan Pengendalian Gratifikasi

Dewan Komisaris, Direksi, Pejabat Eksekutif, Pimpinan Kantor, dan karyawan Bank Victoria serta anggota keluarganya yang mendapatkan gratifikasi/parcel dalam bentuk apapun wajib mengisi formulir penerimaan gratifikasi/parcel dan menyerahkannya kepada Divisi SKAI & *Anti Fraud* untuk ditindaklanjuti.

Sosialisasi Kebijakan Pengendalian Gratifikasi

Sosialisasi terkait pengendalian gratifikasi dilakukan secara berkelanjutan kepada seluruh level organisasi untuk meningkatkan *awareness*. Sosialisasi dilakukan melalui media internal Bank sehingga dapat diakses dengan mudah setiap saat oleh seluruh karyawan Bank.

Laporan Gratifikasi Tahun 2023

Pada tahun 2023, Divisi SKAI & *Anti Fraud* tidak menerima laporan gratifikasi yang mengandung *fraud*.

Management of Gratification Control

The Board of Commissioners, Board of Directors, Executive Officers, Office Heads, and employees of Bank Victoria including their family members who receive any gratification/parcel in any form whatsoever are obliged to complete gratification/parcel form and submit it to the SKAI & Anti Fraud Division for follow up.

Dissemination of Gratification Control Policy

Gratification control is disseminated on an ongoing basis to all organizational levels to increase awareness. Dissemination is carried out through the Bank's internal media so that it can be conveniently accessed by all of the Bank's employees.

Gratification Report in 2023

In 2023, the SKAI & Anti Fraud Division did not receive any gratification reports that contained fraud

Kebijakan Pencegahan *Insider Trading* [F.1] Policy to Prevent Insider Trading

Guna mencegah terjadinya *insider trading*, Kode Etik Bank telah mengatur pencegahan *insider trading*. Dalam pencegahan *insider trading*, Bank menekankan setiap insan Bank dilarang memanfaatkan informasi rahasia Bank yang diperoleh dan diketahuinya untuk kepentingan pribadi maupun pihak lain yang tidak berwenang. Setiap insan Bank juga dilarang menginformasikan rencana-rencana Bank yang belum dipublikasikan kepada pihak lain yang tidak berkepentingan.

To prevent insider trading, the Bank's Code of Conduct has regulated the prevention of insider trading. In preventing insider trading, the Bank emphasizes that all Bank personnel are prohibited from using the Bank's confidential information that they obtain and know for personal interests or those of other unauthorized parties. All Bank personnel are also prohibited from giving information to other unauthorized parties regarding the Bank's plans that are not published yet.

Sistem Pelaporan Pelanggaran [POJK F.1]

Whistleblowing System

Sistem pelaporan pelanggaran (*whistleblowing system/WBS*) merupakan wadah bagi karyawan dan pemangku kepentingan lainnya untuk menyampaikan laporan terkait pelanggaran yang terjadi di dalam aktivitas bisnis. Penerapan sistem tersebut diharapkan dapat mendorong insan Bank untuk bekerja dengan penuh integritas dan berpegang teguh pada nilai dan budaya Bank.

Kebijakan Sistem Pelaporan Pelanggaran

Bank Victoria telah menetapkan kebijakan WBS dalam 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 Bank mengatur struktur pengelolaan WBS, mekanisme kerja, mulai dari pelaporan pelanggaran, landasan hukum perlindungan pelapor, perlindungan yang diberikan, serta monitoring dan *review*. Kebijakan WBS juga mengatur kewajiban Tim Pengelola WBS untuk:

1. Melaksanakan program promosi dan sosialisasi secara ekstensif dan intensif supaya pelaksanaan prosedur WBS dapat dipahami dengan benar;
2. Menyelenggarakan tata laksana organisasi sedemikian rupa sehingga laporan pelanggaran yang disampaikan dapat ditangani dengan baik serta terdokumentasi dengan baik, namun kerahasiaan pelapor juga tetap terjaga;
3. Melakukan laporan setiap semester kepada Direksi tentang pelaksanaan program WBS terkait laporan dugaan pelanggaran, meliputi sekurang-kurangnya:
 - a. Apakah prosedur WBS dapat diterapkan dengan baik dan mendapatkan sambutan yang positif dari karyawan ataupun para pemangku kepentingan lainnya?
 - b. Apakah prosedur WBS cukup efektif dalam melakukan deteksi dini dan pencegahan penyimpangan ataupun pelanggaran?
 - c. Apakah terdapat suatu pola pelanggaran tertentu yang sering berulang? Apakah kira-kira penyebabnya?
 - d. Saran perbaikan untuk meningkatkan efektivitas penerapan WBS dalam mencapai sasaran penciptaan iklim kerja yang terbuka, tulus, dan bertanggung jawab.

Sosialisasi Kebijakan Sistem Pelaporan Pelanggaran

Bank secara rutin melakukan sosialisasi WBS dan edukasi untuk mencegah *fraud*. Di lingkungan internal, Tim Pengelola WBS melakukan sosialisasi WBS melalui pelatihan dan mengirimkan

The whistleblowing system (WBS) is a forum for employees and other stakeholders to submit reports regarding violations that occur in business activities. The implementation of this system is expected to encourage Bank personnel to work with integrity and uphold the Bank's values and culture.

Whistleblowing System Policy

Bank Victoria established a WBS policy 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. The Bank's WBS policy governs the WBS management structure, work mechanism, starting from violation reporting, legal basis of whistleblower protection, protection provided, and monitoring and review. The WBS policy also regulates the WBS Managing Team's obligations 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

The Bank routinely conducts dissemination of WBS and education to prevent fraud. In the internal environment, the WBS Management Team disseminates WBS through training and

e-mail bulanan. Sedangkan di lingkungan eksternal, sosialisasi dilakukan melalui situs web Bank, buletin internal, poster, sosialisasi etika, dan presentasi langsung kepada pihak terkait.

Jenis Pelanggaran yang Dapat Dilaporkan

Jenis-jenis pelanggaran yang dapat dilaporkan kepada Tim WBS meliputi 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);
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 Pernyataan Standar Akuntansi Keuangan;
5. Perbuatan yang dapat merugikan Bank, baik finansial maupun non-finansial, termasuk menciderai citra Bank;
6. Pelanggaran aturan internal yang dapat menciderai integritas pelaporan perusahaan, baik di bidang keuangan ataupun bidang lainnya; dan
7. Perbuatan yang membahayakan keselamatan dan kesehatan kerja.

Cara Penyampaian Laporan Pelanggaran dan Pihak yang Mengelola Pelanggaran

Bank Victoria menerapkan mekanisme WBS, di mana pelapor dapat menyampaikan laporan suatu pelanggaran secara lisan, dengan surat, melalui *e-mail* atau sms kepada Unit Anti *Fraud* pada alamat sebagai berikut:

1. Melalui Surat
Ditujukan kepada Direktur Utama dan ditembuskan kepada Unit Anti *Fraud* di Graha BIP Lt. 10, Jl. Gatot Subroto Kav. 23, Karet Semanggi, Setiabudi, Jakarta Selatan, Daerah Khusus Ibukota Jakarta 12930.
2. Melalui *E-mail*
 - a. Unit Anti *Fraud* apabila terlapor adalah karyawan dengan alamat *e-mail*: unitantifraud@victoriabank.co.id.
 - b. Direktur Utama apabila terlapor adalah anggota Dewan Komisaris dengan alamat *e-mail* unitantifrauddireksi@victoriabank.co.id.
 - c. Dewan Komisaris apabila terlapor adalah anggota Direksi dengan alamat *e-mail* unitantifraudkomisaris@victoriabank.co.id.
3. Melalui telepon atau SMS dengan nomor ke: 081 1870 7649.

sending monthly e-mails. Meanwhile, in the external environment, dissemination is carried out through the Bank's website, internal bulletin, poster, dissemination of ethics, and direct presentations to the related parties.

Types of Violation that Can Be Reported

Types of violations that can be reported to the WBS Team 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. 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 the Statement of Financial Accounting Standards;
5. Acts that may harm the Bank, both financially and nonfinancially, including harm the Bank's image;
6. Violations of internal rules that may jeopardize the integrity of the corporate reporting, whether in finance or other fields; and
7. Acts that endanger occupational safety and health.

Mechanism to Submit Whistleblowing Report and Party Managing the Violations

Bank Victoria implements a WBS mechanism in which reporters can submit reports of a violation orally, by letter, via e-mail or sms to the Anti Fraud Unit at the following address:

1. By Mail
Addressed to the President Director with a copy to the Anti Fraud Unit at Graha BIP 10th Floor, Jl. Gatot Subroto Kav. 23, Karet Semanggi, Setiabudi, Jakarta Selatan, Daerah Khusus Ibukota Jakarta 12930.
2. By E-mail
 - a. Anti Fraud Unit, if the reported party is an employee, at unitantifraud@victoriabank.co.id.
 - b. President Director, if the reported party is a member of the Board of Commissioners, at unitantifrauddireksi@victoriabank.co.id.
 - c. Board of Commissioners, if the reported party is a member of the Board of Directors, at unitantifraudkomisaris@victoriabank.co.id.
3. By telephone or SMS to: 081 1870 7649.

Perlindungan bagi Pelapor

Manajemen Bank Victoria sangat menyarankan agar pelapor mencantumkan identitas untuk memudahkan Tim *Anti Fraud* dalam melakukan investigasi. Meskipun demikian, kerahasiaan identitas pelapor akan tetap dijaga Tim *Anti Fraud* dan dijamin oleh Dewan Komisaris dan Direksi. Informasi minimal pelapor yang diperlukan adalah alamat surat atau *e-mail*, nomor telepon, atau nomor telepon genggam.

Apabila pelapor merasa terancam setelah melaporkan adanya tindakan pelanggaran, maka dalam hal ini, Bank berkewajiban untuk melakukan perlindungan yang meliputi:

1. Perlindungan fisik, baik terhadap dirinya sendiri maupun keluarganya;
2. Perlindungan terhadap harta benda miliknya dan milik keluarganya atas teror ataupun pembalasan yang harus dialaminya;
3. Perlindungan administratif yang berupa penundaan kenaikan pangkat, pemecatan, pengucilan di tempat kerja, mutasi yang tidak layak, termasuk kepastian kerja dan lainnya; serta
4. Perlindungan hukum dalam proses litigasi di Pengadilan Negeri, termasuk biayanya, dan bila perlu termasuk perlindungan melalui Lembaga Perlindungan Saksi dan Korban.

Penanganan Pengaduan

Setiap pengaduan pelanggaran yang masuk akan dikelola oleh Tim *Anti Fraud*, untuk selanjutnya dilakukan investigasi atas kebenaran laporan yang diterima. Jika diketahui bahwa laporan terbukti kebenarannya, maka akan disampaikan kepada Dewan Komisaris dan Direksi untuk menentukan jenis sanksi yang akan diberikan. Sedangkan, laporan yang tidak terbukti keakuratannya, maka laporan tersebut akan diabaikan dan disisihkan sebagai laporan yang tidak perlu ditindaklanjuti. Bank juga tidak akan memberikan sanksi kepada pelapor apabila laporannya tidak terbukti setelah melalui penyelidikan yang dilakukan oleh Tim *Anti Fraud*.

Laporan Pelanggaran Tahun 2023 dan Tindak Lanjutnya

Sepanjang tahun 2023, tidak terdapat penyimpangan atau kecurangan proses kerja dan kegiatan operasional Bank, baik yang dilakukan oleh Dewan Komisaris, Direksi, maupun karyawan Bank.

Protection for Whistleblower

Bank Victoria's management strongly recommends that the whistleblower includes his/her identity in the report to make it easier for the Anti Fraud Team to carry out investigations. 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 that is needed at least covers the email address, phone number, or mobile phone number.

If the whistleblower feels threatened after reporting a violation, then in this case the Bank is obligated to protect the whistleblower which includes:

1. Physical protection, both for the whistleblower and for the family members;
2. Protection for the whistleblower's properties and family members' properties against terror or any retaliation the whistleblower is dealing with;
3. Administrative protection in the form of suspension of promotion, termination, expulsion at work, unreasonable transfer, including work assurance etc.; and
4. Legal protection in the litigation process in the District Court, including the fee and if necessary, including protection through Witness and Victim Protection Agency.

Complaint Handling

Any incoming violation complaint will be managed by the Anti Fraud team, to further be investigated for its truth. In the event that the report is proven to be true, it will be submitted to the Board of Commissioners and Board of Directors to determine the type of sanction to be imposed. Whereas, complaint that is proven inaccurate will be ignored and set aside as a report that does need to be followed-up. The Bank will not impose any sanction to whistleblower of a report that is not proven true after an investigation is carried out by the Anti Fraud Team.

Whistleblowing Report in 2023 and Its Follow Up

Throughout 2023, there were no irregularities or fraud in the Bank's work processes and operational activities, whether committed by the Board of Commissioners, Board of Directors, or Bank employees.

Akses Informasi dan Data Perusahaan

Access to Company's Information and Data

Bank berkomitmen untuk memberikan kemudahan akses informasi kepada masyarakat, Pemegang Saham, ataupun pemangku kepentingan lainnya. Informasi tersebut dapat diakses melalui:

Corporate Secretary

Gedung Graha BIP Lt. 10
Jl. Gatot Subroto Kav. 23
Jakarta Selatan 12930
T : (021) 522 8888
F : (021) 522 8777
E : corsec@victoriabank.co.id
W : www.victoriabank.co.id

Situs Web

Publik dapat dengan mudah mengakses situs web Bank untuk mendapatkan informasi keuangan dan non-keuangan, termasuk produk/fasilitas, laporan-laporan wajib, dan peluang karier di Bank. Situs web Bank juga menyediakan saluran informasi terkait dengan Bank Victoria, meliputi:

1. Call center : 1500977
2. E-mail : costumercare@victoriabank.co.id
3. Facebook : @BankVictorialD
4. Youtube : Bank Victoria
5. Instagram : @bankvictoria

Media Elektronik

Bank menggunakan media elektronik seperti situs web dan *e-mail* (corsec@victoriabank.co.id) untuk menyampaikan informasi yang relevan, termasuk Laporan Tahunan. Pemangku kepentingan dapat mendaftarkan identitas dan alamat *e-mail* pada *mailing list* melalui situs web Bank (www.victoria.co.id) untuk mendapatkan informasi secara berkala.

Siaran Pers

Bank Victoria menggunakan *article placement* untuk menginformasikan kegiatan terkait kinerja dan kegiatan lainnya. Selama tahun 2023, Bank Victoria telah menerbitkan *article placement* sebanyak 17 (tujuh belas) artikel.

The Bank is committed to providing easy access to information for the public, Shareholders, and other stakeholders. This information can be accessed through:

Corporate Secretary

Graha BIP Building 10th Floor
Jl. Gatot Subroto Kav. 23
South Jakarta 12930
T : (021) 522 8888
F : (021) 522 8777
E : corsec@victoriabank.co.id
W : www.victoriabank.co.id

Website

The public can easily access the Bank's website to obtain financial and non-financial information, including products/facilities, mandatory reports, and career opportunities at the Bank. The Bank's website also provides information channels related to Bank Victoria, including:

1. Call center : 1500977
2. E-mail : costumercare@victoriabank.co.id
3. Facebook : @BankVictorialD
4. Youtube : Bank Victoria
5. Instagram : @bankvictoria

Electronic Media

The Bank uses electronic media such as website and email (corsec@victoriabank.co.id) to deliver relevant information, including Annual Reports. Stakeholders can register their identity and email address on the mailing list via the Bank's website (www.victoria.co.id) to regularly receive information.

Press Release

Bank Victoria uses article placements to inform performance-related activities and other activities. In 2023, Bank Victoria issued 17 (seventeen) article placements.

Buletin

Bank Victoria menerbitkan buletin bernama Victoria News sebagai media untuk menyampaikan informasi kepada pemangku kepentingan. Selama tahun 2023, Victoria News telah menerbitkan konten sebanyak 24 (dua puluh empat) kali.

Bulletin

Bank Victoria issued a bulletin called Victoria News as a medium for delivering information to stakeholders. In 2023, Victoria News published content 24 (twenty-four) times.

Implementasi Tata Kelola Perusahaan Terbuka

Implementation of Corporate Governance of Public Company

Penerapan GCG Bank telah disesuaikan dengan Peraturan Otoritas Jasa Keuangan No. 21/POJK.04/2015 dan Surat Edaran Otoritas Jasa Keuangan No. 32/SEOJK.04/2015, sebagaimana diungkapkan berikut:

The Bank's GCG implementation has been adjusted to the Financial Services Authority Regulation No. 21/POJK.04/2015 and Financial Services Authority Circular No. 32/SEOJK.04/2015, as stated below:

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 1: Meningkatkan Nilai Penyelenggaraan RUPS. Principle 1: Increasing the Value of Convening GMS.	
REKOMENDASI 1	RECOMMENDATION 1
Perusahaan terbuka memiliki cara atau prosedur teknis pengumpulan suara (<i>voting</i>), baik secara terbuka maupun tertutup yang mengedepankan independensi, dan kepentingan Pemegang Saham.	The public company has technical voting methods or procedures, either open or close, prioritizing independence, and interest of Shareholders.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Bank memiliki prosedur pengumpulan suara dalam RUPS yang diatur dalam Anggaran Dasar.	Complied The Bank has procedures for voting at the GMS which are regulated in the Articles of Association.
REKOMENDASI 2	RECOMMENDATION 2
Seluruh anggota Direksi dan anggota Dewan Komisaris perusahaan terbuka hadir dalam RUPS Tahunan.	All members of Board of Directors and members of Board of Commissioners of the public company attend the Annual GMS.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Seluruh anggota Dewan Komisari dan Direksi hadir dalam RUPS Tahunan 2023.	Complied All members of Board of Commissioners and Board of Directors attended the 2023 Annual GMS.
REKOMENDASI 3	RECOMMENDATION 3
Ringkasan risalah RUPS tersedia dalam situs web perusahaan terbuka paling sedikit selama 1 (satu) tahun.	Summary of GMS minutes is available on the public company's website for at least 1 (one) year.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Situs web Bank Victoria telah memuat ringkasan RUPS selama lebih dari 1 (satu) tahun.	Complied Bank Victoria website has posted a summary of the GMS for more than 1 (one) year.

Prinsip 2: Meningkatkan Kualitas Komunikasi Perusahaan Terbuka dengan Pemegang Saham atau Investor.
Principle 2: Increasing the Communication Quality between the Public Company and Shareholders or Investors.

REKOMENDASI 4	RECOMMENDATION 4
Perusahaan terbuka memiliki suatu kebijakan komunikasi dengan Pemegang Saham atau investor.	The public company has communication policy with the Shareholders or investors.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Bank telah menetapkan kebijakan komunikasi dengan Pemegang Saham atau investor sesuai dengan Anggaran Dasar Bank yang terkait dengan RUPS.	Complied The Bank has established a policy on communication with Shareholders or investors in accordance with the Bank's Articles of Association related to the GMS.
REKOMENDASI 5	RECOMMENDATION 5
Perusahaan terbuka mengungkapkan kebijakan komunikasi perusahaan terbuka dengan Pemegang Saham atau investor dalam situs web.	The public company discloses its policy on communication with Shareholders or investors on the website.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Bank telah memiliki kebijakan komunikasi dalam rangka transparansi dan memberikan kesetaraan informasi kepada Pemegang Saham atau investor yang dapat diakses pada situs resmi Bank www.victoriabank.co.id bagian Hubungan Investor.	Complied The Bank already has a communication policy in order to be transparent and provide information equality to Shareholders or Investors, which can be accessed on the Bank's official website at www.victoriabank.co.id in the Investor Relations section.

Aspek 2: Fungsi dan Peran Dewan Komisaris
Aspect 2: Functions and Roles of the Board of Commissioners

Prinsip 3: Memperkuat Keanggotaan dan Komposisi Dewan Komisaris.
Principle 3: Strengthening the Board of Commissioners' Membership and Composition.

REKOMENDASI 6	RECOMMENDATION 6
Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi perusahaan terbuka.	The determination of number of Board of Commissioners' members considers the public company's condition.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Penentuan jumlah anggota Dewan Komisaris telah mempertimbangkan kondisi terkini Bank serta telah memenuhi persyaratan Otoritas Jasa Keuangan.	Complied The determination of number of Board of Commissioners' members has considered the Bank's current condition and has met the requirements of the Financial Services Authority.
REKOMENDASI 7	RECOMMENDATION 7
Penentuan komposisi anggota Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.	The determination of Board of Commissioners' composition considers the range of expertise, knowledge, and experience required.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Anggota Dewan Komisaris yang menjabat saat ini memiliki keahlian, pengetahuan, dan pengalaman yang dibutuhkan Bank.	Complied The current members of Board of Commissioners have expertise, knowledge, and experience required by the Bank.

Prinsip 4: Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris.
Principle 4: Increasing the Quality of Implementation of Board of Commissioners' Duties and Responsibilities.

REKOMENDASI 8	RECOMMENDATION 8
Dewan Komisaris mempunyai kebijakan penilaian sendiri (<i>self assessment</i>) untuk menilai kinerja Dewan Komisaris.	The Board of Commissioners has self-assessment policy to assess the Board of Commissioners' performance.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Kebijakan terkait penilaian sendiri kinerja Dewan Komisaris telah dimuat dalam <i>BOC Charter</i> .	Complied The policy related to self-assessment of the Board of Commissioners' performance has been set out in the <i>BOC Charter</i> .
REKOMENDASI 9	RECOMMENDATION 9
Kebijakan penilaian sendiri (<i>self assessment</i>) untuk menilai kinerja Dewan Komisaris, diungkapkan melalui Laporan Tahunan perusahaan terbuka.	The self-assessment policy to assess the Board of Commissioners' performance is disclosed in the public company's Annual Report.

STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
<p>Terpenuhi Berdasarkan <i>BOC Charter</i>, Dewan Komisaris melaksanakan penilaian sendiri secara konsisten setiap tahun. Uraian terkait pelaksanaan penilaian sendiri Dewan Komisaris telah disampaikan dalam Laporan Tahunan ini.</p>	<p>Complied Based on the <i>BOC Charter</i>, the Board of Commissioners consistently performs self-assessment annually. The description regarding the implementation of Board of Commissioners' self-assessment is conveyed in this Annual Report.</p>
REKOMENDASI 10	RECOMMENDATION 10
<p>Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan.</p>	<p>The Board of Commissioners has policy related to resignation of the Board of Commissioners' members if involved in financial crime.</p>
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
<p>Terpenuhi Kebijakan terkait pengunduran diri Dewan Komisaris apabila terlibat kejahatan keuangan telah dimuat dalam <i>BOC Charter</i>.</p>	<p>Complied The policy related to the resignation of the Board of Commissioners if they are involved in financial crimes are contained in the <i>BOC Charter</i>.</p>
REKOMENDASI 11	RECOMMENDATION 11
<p>Dewan Komisaris atau Komite yang menjalankan fungsi nominasi dan remunerasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi.</p>	<p>The Board of Commissioners or Committee performing nomination and remuneration functions prepares the succession policy for the nomination process of the Board of Directors' members.</p>
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
<p>Terpenuhi Komite Nominasi dan Remunerasi Bank telah mempunyai kebijakan suksesi dalam proses Nominasi anggota Direksi yang tertuang dalam Kebijakan Sistem Nominasi dan Remunerasi.</p>	<p>Complied The Bank's Nomination and Remuneration Committee already has a succession policy for the Nomination process of the Board of Directors' members as stated in the Nomination and Remuneration System Policy.</p>

Aspek 3: Fungsi dan Peran Direksi

Aspect 3: Functions and Roles of the Board of Directors

Prinsip 5: Memperkuat Keanggotaan dan Komposisi Direksi. Principle 5: Strengthening the Board of Directors' Membership and Composition.	
REKOMENDASI 12	RECOMMENDATION 12
<p>Penentuan jumlah anggota Direksi mempertimbangkan kondisi perusahaan terbuka, serta efektivitas dalam pengambilan keputusan.</p>	<p>The determination of number of Board of Directors' members considers the public company's condition and effectiveness in decision-making.</p>
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
<p>Terpenuhi Penentuan jumlah anggota Direksi telah mempertimbangkan kondisi terkini Bank serta telah memenuhi persyaratan Otoritas Jasa Keuangan.</p>	<p>Complied The determination of number of Board of Directors' members has considered the Bank's current condition and has met the requirements of the Financial Services Authority.</p>
REKOMENDASI 13	RECOMMENDATION 13
<p>Penentuan komposisi anggota Direksi memperhatikan, keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.</p>	<p>The determination of Board of Directors' composition considers the range of expertise, knowledge, and experience required.</p>
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
<p>Terpenuhi Anggota Direksi yang menjabat saat ini memiliki keahlian, pengetahuan, dan pengalaman yang dibutuhkan Bank.</p>	<p>Complied The current members of Board of Directors have the expertise, knowledge, and experience required by the Bank.</p>
REKOMENDASI 14	RECOMMENDATION 14
<p>Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi.</p>	<p>The Board of Directors' member in charge of accounting or finance has the expertise and/or knowledge in accounting.</p>
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
<p>Terpenuhi Anggota Direksi yang membawahi bidang akuntansi atau keuangan telah memiliki keahlian dan/atau pengetahuan di bidang akuntansi.</p>	<p>Complied The Board of Directors' member in charge of accounting or finance already has the expertise and/or knowledge in accounting.</p>

Prinsip 6: Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Direksi.
Principle 6: Increasing the Quality of Implementation of Board of Directors' Duties and Responsibilities.

REKOMENDASI 15	RECOMMENDATION 15
Direksi mempunyai kebijakan penilaian sendiri (<i>self assessment</i>) untuk menilai kinerja Direksi.	The Board of Directors has self-assessment policy to assess the Board of Directors' performance.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Kebijakan terkait penilaian sendiri kinerja Direksi telah dimuat dalam <i>BOD Charter</i> .	Complied The policy related to self-assessment of the Board of Directors' performance has been set out in the BOD Charter.
REKOMENDASI 16	RECOMMENDATION 16
Kebijakan penilaian sendiri (<i>self assessment</i>) untuk menilai kinerja Direksi diungkapkan melalui laporan tahunan perusahaan terbuka.	The self-assessment policy to assess the Board of Directors' performance is disclosed in the public company's Annual Report.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Berdasarkan <i>BOD Charter</i> , Direksi melaksanakan penilaian sendiri secara konsisten setiap tahun. Uraian terkait pelaksanaan penilaian sendiri Direksi telah disampaikan dalam Laporan Tahunan ini.	Complied Based on the BOD Charter, the Board of Directors consistently performs the self-assessment annually. The description regarding the implementation of Board of Directors' self-assessment is conveyed in this Annual Report.
REKOMENDASI 17	RECOMMENDATION 17
Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan.	The Board of Directors has policy related to resignation of the Board of Directors' members if involved in financial crime.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Kebijakan terkait pengunduran diri Direksi apabila terlibat kejahatan keuangan telah dimuat dalam <i>BOD Charter</i> .	Complied The policy related to the resignation of Board of Directors if they are involved in financial crimes are contained in the BOD Charter.

Aspek 4: Partisipasi Pemangku Kepentingan
Aspect 4: Stakeholders Participation

Prinsip 7: Meningkatkan Aspek Tata Kelola Perusahaan melalui Partisipasi Pemangku Kepentingan.
Principle 7: Increasing the Corporate Governance Aspect through Stakeholders Participation.

REKOMENDASI 18	RECOMMENDATION 18
Perusahaan terbuka memiliki kebijakan untuk mencegah terjadinya <i>insider trading</i> .	The public company has a policy to prevent the occurrence of insider trading.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Kebijakan untuk mencegah <i>insider trading</i> telah dimuat dalam Kode Etik.	Complied Policy to prevent insider trading is set out in the Code of Conduct.
REKOMENDASI 19	RECOMMENDATION 19
Perusahaan terbuka memiliki kebijakan anti korupsi dan <i>anti fraud</i> .	The public company has anti-corruption and anti fraud policy.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Kebijakan tentang anti korupsi dan <i>anti fraud</i> telah dimuat dalam Kode Etik.	Complied Policy on anti corruption and anti fraud is set out in the Code of Conduct.
REKOMENDASI 20	RECOMMENDATION 20
Perusahaan terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor.	The public company has a policy on selection and improvement of supplier's or vendor's capabilities.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor Bank diatur dalam Surat Keputusan Direktur No. 143/SK-DIR/06/14 tanggal 24 Juni 2014 tentang Penambahan dan Perubahan Kebijakan dan Prosedur <i>General Affair</i> .	Complied Policy on selection and improvement of the Bank's supplier's or vendor's capabilities is stipulated under the Board of Directors' Decision Letter No. 143/SK-DIR/06/14 dated 24 June 2014 on Additions and Changes to Policy and Procedure of General Affair.

REKOMENDASI 21	RECOMMENDATION 21
Perusahaan terbuka memiliki kebijakan tentang pemenuhan hak-hak kreditur.	The public company has a policy on the fulfillment of creditor's rights.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Kebijakan tentang pemenuhan hak-hak kreditur telah dimuat dalam Kode Etik.	Complied Policy on the fulfillment of creditor's rights is set out in the Code of Conduct.
REKOMENDASI 22	RECOMMENDATION 22
Perusahaan terbuka memiliki kebijakan sistem WBS.	The public company has a policy on WBS system.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Bank telah memutakhirkan Kebijakan dan Standar Operasional Prosedur Penerapan <i>Anti Fraud</i> serta Penerapan <i>Whistleblowing System</i> melalui 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.	Complied The Bank has updated the Policy and Standard Operating Procedure for the Implementation of Anti Fraud and Whistleblowing System through 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.
REKOMENDASI 23	RECOMMENDATION 23
Perusahaan terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan.	The public company has a policy on provision of long-term incentive for the Board of Directors and employees.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Bank memberlakukan insentif jangka panjang kepada Direksi dan karyawan sesuai dengan Keputusan Direksi No. 001A/SK-DIR/12/22 tanggal 1 Desember 2022 tentang Kebijakan dan Prosedur <i>Human Capital Management</i> . Informasi terkait pemberian insentif ini terdokumentasi dalam catatan Laporan Keuangan, khususnya terkait Liabilitas Imbalan Kerja, yang terlampir dalam Laporan Tahunan ini.	Complied The Bank applies long-term incentives to the Board of Directors and employees in accordance with the Board of Directors Decree No. 001A/SK-DIR/12/22 dated 1 December 2022 on Human Capital Management Policies and Procedures. Information related to the provision of incentives is documented in the notes to Financial Statements, particularly related to Employee Benefits Obligation as enclosed to this Annual Report.

Aspek 5: Keterbukaan Informasi

Aspect 5: Information Disclosure

Prinsip 8: Meningkatkan Pelaksanaan Keterbukaan Informasi.

Principle 8: Increasing the Implementation of Information Disclosure.

REKOMENDASI 24	RECOMMENDATION 24
Perusahaan terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs web sebagai media keterbukaan informasi.	The public company utilizes information technology more broadly, in addition to the website, as a media for information disclosure.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Platform media sosial, IDX Net, dan Sistem Pelaporan Otoritas Jasa Keuangan dimanfaatkan dengan baik oleh Bank sebagai sarana penyampaian informasi bagi para pemangku kepentingan.	Complied Social media platforms, IDX Net, and the Financial Services Authority Reporting System are properly utilized by the Bank as a means of delivering information to stakeholders.
REKOMENDASI 19	RECOMMENDATION 19
Laporan Tahunan perusahaan terbuka mengungkapkan pemilik manfaat akhir dalam kepemilikan saham perusahaan terbuka paling sedikit 5%, selain pengungkapan pemilik manfaat akhir dalam kepemilikan saham perusahaan terbuka melalui Pemegang Saham Utama dan Pengendali.	The public company's Annual Report discloses the ultimate beneficial owner of the public company's share ownership of at least 5%, in addition to the disclosure of the ultimate beneficial owner in the share ownership of public company through the Main and Controlling Shareholders.
STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Informasi terkait pemilik manfaat terakhir Bank diungkapkan pada bagian Profil Perusahaan dalam Laporan Tahunan ini.	Complied Information related to the Bank's ultimate beneficial owner is disclosed in the Company Profile section of this Annual Report.

Pedoman Umum Governansi Korporat Indonesia

General Guidelines for Indonesian Corporate Governance

Bank Victoria menerapkan prinsip dan rekomendasi PUGKI 2021 berdasarkan pendekatan “terpenuhi atau penjelasan” dengan rincian implementasi sebagai berikut:

Bank Victoria applies the principles and recommendations of the 2021 PUGKI (General Guidelines for Indonesian Corporate Governance) based on the “complied or explanation” approach with details of its implementation as follows:

Prinsip 1: Peran dan Tanggung Jawab Direksi dan Dewan Komisaris

Principle 1: Roles and Responsibilities of the Board of Directors and Board of Commissioners

Rekomendasi 1.1: Peran dan Tanggung Jawab Direksi. Recommendation 1.1: Roles and Responsibilities of the Board of Directors.	
REKOMENDASI 1.1.1:	RECOMMENDATION 1.1.1:
Untuk mencapai penciptaan nilai yang berkelanjutan, Direksi menjalankan peran kepemimpinannya dan berupaya mencapai hasil governansi sebagai berikut: 1. Berdaya saing dan berfokus ke kinerja jangka panjang; 2. Beretika dan bertanggung jawab dalam menjalankan bisnis; 3. Berkontribusi positif terhadap masyarakat dan lingkungan; serta 4. Berkemampuan dalam bertahan dan bertumbuh (<i>corporate resilience</i>).	To achieve sustainable value creation, the Board of Directors carries out its leadership role and seeks to achieve the following governance results: 1. Be competitive and focused on long-term performance; 2. Be ethical and responsible in conducting business; 3. Have positive contributions to the community and the environment; and 4. Be able to survive and grow (<i>corporate resilience</i>).
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Direksi mewujudkan standar etika bisnis yang tinggi dan memastikan pelaksanaan Kode Etik yang melahirkan budaya korporasi yang berintegritas. Hal ini dilakukan salah satunya dengan menerapkan Nilai Budaya Perusahaan, SQEW (<i>Safe, Quick, Easy, Warm</i>).	Complied The Board of Directors realizes high standards of business ethics and ensures that the Code of Conduct implementation creates a corporate culture with integrity. This is done, among others, by implementing the Company’s Cultural Values, SQEW (<i>Safe, Quick, Easy, Warm</i>).
REKOMENDASI 1.1.2:	RECOMMENDATION 1.1.2:
Direksi harus memastikan bahwa misi, visi, tujuan, sasaran, strategi, dan rencana tahunan dan jangka menengah korporasi konsisten dengan tujuan jangka panjang, dengan memanfaatkan inovasi dan teknologi secara efektif.	The Board of Directors must ensure that the corporate mission, vision, goals, objectives, strategies, and annual as well as mid-term plans are consistent with the long-term goals, by effectively utilizing innovation and technology.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Direksi telah menjadikan optimalisasi penerapan teknologi informasi terkini sebagai salah satu pilar strategi dalam mencapai target bisnis baik jangka pendek maupun jangka panjang.	Complied The Board of Directors has made the optimization of the latest information technology application as one of the strategic pillars in achieving both short and long-term business targets.
REKOMENDASI 1.1.3:	RECOMMENDATION 1.1.3:
Direksi memastikan bahwa korporasi menerapkan manajemen risiko dan sistem pengendalian internal yang tepat dan efektif yang selaras dengan visi, misi, tujuan, sasaran, dan strategi korporasi serta mematuhi peraturan perundang-undangan dan standar yang berlaku.	The Board of Directors ensures that the corporation implements an appropriate and effective risk management and internal control system, that is aligned with the corporate vision, mission, goals, objectives, and strategies, as well as complies with applicable laws and regulations and standards.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Sistem manajemen risiko dan pengendalian internal Bank senantiasa selaras dengan visi, misi, tujuan, sasaran, dan strategi korporasi serta mematuhi peraturan perundang-undangan dan standar yang berlaku.	Complied The Bank’s risk management and internal control systems are always aligned with the corporate vision, mission, goals, objectives, and strategies as well as complying with applicable laws and regulations and standards.
REKOMENDASI 1.1.4:	RECOMMENDATION 1.1.4:
Direksi memastikan integritas akuntansi dan sistem pelaporan keuangan korporasi dan pengungkapan yang tepat waktu dan akurat atas semua informasi material mengenai korporasi.	The Board of Directors ensures the integrity of corporate accounting and financial reporting system and the timely and accurate disclosure of all material information on the corporation.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Direksi memastikan bahwa setiap orang yang terlibat dalam persiapan dan pengungkapan informasi korporasi memiliki kemampuan dan latar belakang yang memadai untuk menjalankan pekerjaannya. Direksi juga bertanggung jawab atas dan melakukan publikasi Laporan Keuangan Triwulanan di situs web Bank dan media massa sesuai peraturan yang berlaku.</p>	<p>Complied The Board of Directors ensures that everyone involved in the preparation and disclosure of corporate information has adequate skills and background to perform the work. The Board of Directors is also responsible for and publishes the Quarterly Financial Statements on the Bank's website and mass media in accordance with applicable regulations.</p>
<p>REKOMENDASI 1.1.5:</p> <p>Direksi memastikan pelaporan keberlanjutan telah disusun sebagaimana mestinya.</p>	<p>RECOMMENDATION 1.1.5:</p> <p>The Board of Directors ensures that sustainability reporting has been prepared properly.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Direksi beserta jajaran manajemen telah memastikan Laporan Keberlanjutan disusun berdasarkan kerangka pelaporan yang sesuai dengan ukuran dan kompleksitas korporasi dan memenuhi standar nasional.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The Board of Directors and the management have ensured that the Sustainability Report is prepared based on a reporting framework that is appropriate to the corporate size and complexity and meets national standards.</p>
<p>REKOMENDASI 1.1.6:</p> <p>Direksi membangun kerangka kerja untuk governansi teknologi informasi korporasi yang selaras dengan kebutuhan dan prioritas bisnis korporasi, mendorong peluang dan kinerja bisnis, memperkuat manajemen risiko, serta mendukung tujuan dan strategi korporasi.</p>	<p>RECOMMENDATION 1.1.6:</p> <p>The Board of Directors builds a framework for corporate information technology governance that is aligned with corporate business needs and priorities, drives business opportunities and performance, strengthens risk management, as well as supports corporate goals and strategies.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Strategi dan kerangka kerja governansi TI Bank dijelaskan dengan rinci pada Laporan Tahunan ini. Direksi memastikan bahwa Bank memiliki kebijakan alokasi sumber daya TI yang memadai dan optimal untuk mendukung tujuan dan strategi Bank.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The Bank's IT governance strategy and framework are explained in detail in this Annual Report. The Board of Directors ensures that the Bank has adequate and optimal IT resource allocation policies to support the Bank's goals and strategies.</p>
<p>REKOMENDASI 1.1.7:</p> <p>Bagi korporasi yang menjalankan kegiatan usaha berdasarkan prinsip syariah, Direksi perlu memastikan kewenangan dan ketersediaan perangkat pendukung yang memadai agar Dewan Pengawas Syariah dapat menjalankan perannya dengan efektif.</p>	<p>RECOMMENDATION 1.1.7:</p> <p>For corporations that conduct business activities based on sharia principles, the Board of Directors needs to ensure the authority and availability of adequate supporting tools, allowing the Sharia Supervisory Board to carry out its role effectively.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Penjelasan Di tahun 2023, Bank tidak memiliki dan menjalankan kegiatan usaha berdasarkan prinsip syariah.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Explanation In 2023, the Bank did not have and conduct business activities based on sharia principles.</p>
<p>REKOMENDASI 1.1.8:</p> <p>Piagam Direksi secara periodik ditinjau. Piagam mencakup antara lain pembagian peran Direktur secara individual dapat diatur di Piagam Direksi atau dengan surat keputusan Direksi.</p>	<p>RECOMMENDATION 1.1.8:</p> <p>The Board of Directors' Charter is periodically reviewed. The Charter includes, among others, the division of roles for the Directors individually, which can be regulated in the Board of Directors' Charter or by a decision letter of the Board of Directors.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi <i>BOD Charter</i> ditelaah secara berkala dan telah diperbarui pada tanggal 6 Desember 2023 dan diunggah ke situs web Bank (www.victoriabank.co.id).</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The BOD Charter is reviewed periodically and was updated on 6 December 2023 and uploaded to the Bank's website (www.victoriabank.co.id).</p>
<p>REKOMENDASI 1.1.9:</p> <p>Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan.</p>	<p>RECOMMENDATION 1.1.9:</p> <p>The Board of Directors has a policy on resignation of members of the Board of Directors if involved in a financial crime and are proven to have made a mistake.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan dituangkan dalam <i>BOD Charter</i>.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The policy related to the resignation of members of the Board of Directors if involved in financial crimes and proven wrongdoing are outlined in the BOD Charter.</p>

Rekomendasi 1.2: Penilaian Kinerja - Direksi dan Anggotanya.
 Recommendation 1.2: Performance Assessment - Board of Directors and its Members.

REKOMENDASI 1.2.1:	RECOMMENDATION 1.2.1:
Dewan Komisaris melakukan evaluasi formal tahunan secara objektif dan independen untuk menentukan efektivitas Direksi dan setiap individu Direktur.	The Board of Commissioners conducts an annual formal evaluation objectively and independently to determine the effectiveness of the Board of Directors and each individual Director.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Bank memiliki kebijakan penilaian terhadap kinerja Direksi yang terdiri dari penilaian kinerja dengan metode penilaian sendiri dan penilaian kinerja oleh Dewan Komisaris yang dilakukan minimum 1 (satu) kali dalam setahun. Penjelasan lebih lengkap disampaikan pada pembahasan Penilaian Kinerja Direksi dalam Laporan Tahunan ini.	Complied The Bank has a policy to assess the Board of Directors' performance, consisting of performance assessment with self-assessment method and performance assessment by the Board of Commissioners, conducted at least 1 (one) time a year. A more detailed explanation is provided in the discussion on the Board of Directors' Performance Assessment in this Annual Report.
REKOMENDASI 1.2.2:	RECOMMENDATION 1.2.2:
Dewan Komisaris dengan pertimbangan Komite Nominasi dan Remunerasi, bertanggung jawab menentukan kriteria evaluasi kinerja dan menilai kinerja Direktur Utama dan anggota Direksi lainnya.	The Board of Commissioners, with considerations from the Nomination and Remuneration Committee, is responsible for determining performance evaluation criteria and assessing the performance of the President Director and other members of the Board of Directors.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Kriteria penilaian kinerja Direksi oleh Dewan Komisaris telah mempertimbangkan usulan Komite Nominasi dan Remunerasi.	Complied The performance assessment criteria of the Board of Directors by the Board of Commissioners have considered the recommendations of the Nomination and Remuneration Committee.

Rekomendasi 1.3: Peran dan Tanggung Jawab Dewan Komisaris.
 Recommendation 1.3: Roles and Responsibilities of the Board of Commissioners.

REKOMENDASI 1.3.1:	RECOMMENDATION 1.3.1:
Dewan Komisaris mereviu strategi korporasi paling tidak setiap tahun dan menyetujui misi, visi dan strategi korporasi yang dirumuskan oleh Direksi. Dewan Komisaris juga mereviu, memberikan saran dan menyetujui rencana bisnis dan rencana keuangan jangka panjang dan rencana keuangan jangka pendek korporasi. Dewan Komisaris memberikan advis dan melakukan pemantauan kepada Direksi atas pengelolaan implementasinya. Direksi dan Dewan Komisaris terlibat dalam keputusan yang sangat penting bagi korporasi, diatur dalam Anggaran Dasar korporasi.	The Board of Commissioners reviews the corporate strategy at least annually and approves the corporate mission, vision, and strategy formulated by the Board of Directors. The Board of Commissioners also reviews, provides advice, and approves long-term business and financial plans and the company's short-term financial plans. The Board of Commissioners provides advice and monitors the Board of Directors on the management of its implementation. The Board of Directors and Board of Commissioners are involved in decisions deemed crucial for the corporation, as regulated in the Articles of Association of the Company.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Dewan Komisaris bersama Direksi setiap tahun melakukan kajian dan telaah mengenai kesesuaian visi dan misi Bank terhadap strategi, kondisi Bank saat ini dan tantangan usaha yang akan dihadapi ke depan. Dewan Komisaris juga menelaah, memberikan saran, dan menyetujui rencana bisnis dan rencana keuangan jangka panjang dan rencana keuangan jangka pendek Bank dan melakukan pemantauan atas pengelolaan implementasinya oleh Direksi.	Complied The Board of Commissioners, together with the Board of Directors, annually conducts studies and reviews on the suitability of the Bank's vision and mission to the strategy, the Bank's current condition, and business challenges to face in the future. The Board of Commissioners also reviews, provides advice, approves business plans, long-term financial plans, and short-term financial plans for the Bank, as well as oversees the management of their implementation by the Board of Directors.
REKOMENDASI 1.3.2:	RECOMMENDATION 1.3.2:
Jenis keputusan yang memerlukan persetujuan Dewan Komisaris harus diungkapkan dalam Laporan Tahunan.	The types of decisions that require the Board of Commissioners' approval must be disclosed in the Annual Report.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Keputusan-keputusan yang diambil oleh Dewan Komisaris telah disampaikan pada pembahasan Dewan Komisaris di Laporan Tahunan ini.	Complied Decisions taken by the Board of Commissioners have been presented in the discussion of the Board of Commissioners in this Annual Report.

<p>REKOMENDASI 1.3.3:</p> <p>Dengan memperhatikan rekomendasi Komite Nominasi dan Remunerasi, Dewan Komisaris mengusulkan kepada, dan untuk diputuskan oleh, RUPS pengangkatan dan/atau pemberhentian anggota Direksi dan anggota Dewan Komisaris. Dalam mengusulkan hal di atas, Dewan Komisaris memperhatikan keberagaman, unsur non-diskriminatif dan memberikan kesempatan yang sama tanpa membedakan suku, agama, ras, antar golongan dan gender. Dewan Komisaris memastikan proses pencalonan dan pemilihan anggota Direksi dan anggota Dewan Komisaris adalah formal dan transparan.</p>	<p>RECOMMENDATION 1.3.3:</p> <p>Taking into account the recommendations from the Nomination and Remuneration Committee, the Board of Commissioners proposes to, and to be resolved by, the GMS the appointment and/or dismissal of members of the Board of Directors and members of the Board of Commissioners. In proposing the above, the Board of Commissioners pays attention to the diversity, non-discriminatory elements, and provides equal opportunities regardless of ethnicity, religion, race, class, and gender. The Board of Commissioners ensures a formal and transparent nomination and selection process for members of the Board of Directors and members of the Board of Commissioners.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Sebagaimana diatur dalam Kebijakan Nominasi Bank No. 003/SK-KOM/09/18 tanggal 20 September 2018, Dewan Komisaris berperan aktif dalam proses pengangkatan dan/atau pemberhentian anggota Dewan Komisaris dan Direksi. Dalam proses nominasi, Dewan Komisaris memperhatikan rekomendasi Komite Nominasi dan Remunerasi; keberagaman dengan memberikan kesempatan yang sama tanpa membedakan suku, agama, ras, antar golongan dan gender; serta dilakukan dengan formal dan transparan.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied As stipulated in the Bank's Nomination Policy No. 003/SK-KOM/09/18 dated 20 September 2018, the Board of Commissioners plays an active role in the process of appointing and/or dismissing members of the Board of Commissioners and Board of Directors. In the nomination process, the Board of Commissioners takes into account the recommendations of the Nomination and Remuneration Committee; diversity by providing equal opportunities regardless of ethnicity, religion, race, class, and gender; and carries out the nomination in a formal and transparent manner.</p>
<p>REKOMENDASI 1.3.4:</p> <p>Dewan Komisaris atau Komite yang menjalankan fungsi nominasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi. Setiap tahun Dewan Komisaris meninjau pelaporan pelaksanaan rencana pengembangan dan suksesi yang disampaikan Direktur Utama.</p>	<p>RECOMMENDATION 1.3.4:</p> <p>The Board of Commissioners or the Committee conducting the nomination function prepares a succession policy in the process of nominating members of the Board of Directors. Every year, the Board of Commissioners reviews the report on implementation of development and succession plans submitted by the President Director.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Dalam rangka mempersiapkan regenerasi kepemimpinan, Bank memiliki dan menjalankan kebijakan suksesi Direksi yang merupakan bagian dari Pedoman Kerja Komite Nominasi dan Remunerasi dan telah disampaikan dalam Laporan Tahunan.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied In order to prepare for leadership regeneration, the Bank has established and implements a succession policy for the Board of Directors, which is part of the Nomination and Remuneration Committee Charter and has been presented in the Annual Report.</p>
<p>REKOMENDASI 1.3.5:</p> <p>Dewan Komisaris:</p> <ol style="list-style-type: none"> 1. Mengajukan kepada RUPS, yang dapat didahului oleh usulan dari komite yang menjalankan fungsi remunerasi, besaran remunerasi anggota Direksi dan anggota Dewan Komisaris yang selaras dengan pengembangan korporasi yang berkelanjutan dan kepentingan jangka panjang korporasi dan Pemegang Saham; serta 2. Secara berkala mereviu sistem remunerasi Direksi dan Dewan Komisaris. 	<p>RECOMMENDATION 1.3.5:</p> <p>The Board of Commissioners:</p> <ol style="list-style-type: none"> 1. Submits to the GMS, which may be preceded by recommendation from the committee conducting remuneration function, the remuneration amount for members of the Board of Directors and members of the Board of Commissioners, in line with the sustainable corporate development and long-term interests of the corporation and Shareholders; and 2. Periodically reviews the remuneration system for the Board of Directors and Board of Commissioners.
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Komite Nominasi dan Remunerasi melakukan pembahasan atas remunerasi Dewan Komisaris dan Direksi dengan mempertimbangkan skala usaha, kompleksitas usaha, <i>peer group</i>, tingkat inflasi, kondisi dan kemampuan keuangan Bank, dan tidak bertentangan dengan peraturan perundang-undangan yang berlaku. Dewan Komisaris akan mempelajari rekomendasi dari Komite Nominasi dan Remunerasi dan mengusulkan remunerasi tersebut kepada RUPS. Selain itu, sistem remunerasi Dewan Komisaris dan Direksi ditelaah secara berkala sesuai perkembangan aktivitas Bank dan ketentuan yang berlaku.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The Nomination and Remuneration Committee discusses the remuneration for the Board of Commissioners and Board of Directors by considering the business scale, business complexity, peer group, inflation rate, the Bank's financial condition and capability, and not having any conflict with applicable laws and regulations. The Board of Commissioners will study the recommendations from the Nomination and Remuneration Committee and propose the remuneration to the GMS. In addition, the remuneration system of the Board of Commissioners and Board of Directors is reviewed periodically in accordance with the development of the Bank's activities and applicable regulations.</p>
<p>REKOMENDASI 1.3.6:</p> <p>Dewan Komisaris mengawasi efektivitas kebijakan governansi korporat dan implementasinya serta mengusulkan perubahan jika diperlukan.</p>	<p>RECOMMENDATION 1.3.6:</p> <p>The Board of Commissioners oversees the effectiveness of corporate governance policies and their implementation and proposes changes if necessary.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Dewan Komisaris baik secara langsung atau melalui komite-komite senantiasa mengawasi dan mengarahkan kebijakan dan efektivitas penerapan tata kelola serta memberikan masukan dan perbaikan jika diperlukan.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The Board of Commissioners, either directly or through committees, always supervises and directs the policies and effectiveness of governance implementation and provides input and improvements if necessary.</p>

REKOMENDASI 1.3.7:	RECOMMENDATION 1.3.7:
Dewan Komisaris memantau dan mengarahkan agar korporasi menerapkan manajemen risiko dan sistem pengendalian internal yang tepat dan efektif yang selaras dengan tujuan, sasaran, dan strategi korporasi serta mematuhi peraturan perundang-undangan, kode perilaku, dan standar yang berlaku.	The Board of Commissioners monitors and directs the corporation to implement appropriate and effective risk management and internal control systems that are aligned with the corporate goals, objectives, and strategies, as well as complying with applicable laws and regulations, codes of conduct, and standards.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Dewan Komisaris baik secara langsung atau melalui komite-komite senantiasa mengawasi dan mengarahkan kebijakan dan efektivitas manajemen risiko dan SPI yang dilakukan oleh manajemen.	Complied The Board of Commissioners, either directly or through committees, always supervises and directs the policies and effectiveness of risk management and internal control systems carried out by management.
REKOMENDASI 1.3.8:	RECOMMENDATION 1.3.8:
Dewan Komisaris mengawasi dan mengarahkan agar tercapai integritas akuntansi dan sistem pelaporan keuangan korporat, serta independensi fungsi audit internal dan eksternal.	The Board of Commissioners supervises and directs the integrity of the corporate accounting and financial reporting system, as well as the independence of internal and external audit functions.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Dewan Komisaris senantiasa memastikan integritas akuntansi dan sistem pelaporan keuangan serta independensi fungsi audit internal dan eksternal yang tercermin melalui pembahasan Komite Audit dan SKAI & <i>Anti Fraud</i> di Laporan Tahunan ini.	Complied The Board of Commissioners always ensures the integrity of the accounting and financial reporting systems as well as the independence of internal and external audit functions, which are reflected through the discussions on Audit Committee and SKAI & Anti-Fraud in this Annual Report.
REKOMENDASI 1.3.9:	RECOMMENDATION 1.3.9:
Dewan Komisaris memantau, merevisi, dan menyetujui Laporan Tahunan dan Laporan Keberlanjutan korporasi serta memastikan integritasnya, serta mengawasi proses pengungkapan dan pengkomunikasian korporasi.	The Board of Commissioners monitors, reviews, and approves the Annual Report and Sustainability Report of the corporation, ensures their integrity, and oversees the corporation's disclosure and communication process.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Penyusunan Laporan Tahunan dan Laporan Keberlanjutan dipantau dan disetujui oleh Dewan Komisaris.	Complied The preparation of the Annual Report and Sustainability Report is monitored and approved by the Board of Commissioners.
REKOMENDASI 1.3.10:	RECOMMENDATION 1.3.10:
Piagam Dewan Komisaris secara periodik ditinjau.	The Board of Commissioners Charter is periodically reviewed.
STATUS DAN PENERAPAN:	STATUS AND IMPLEMENTATION:
Terpenuhi <i>BOC Charter</i> dikaji secara berkala dan telah diperbarui pada tanggal 10 Maret 2023 serta diunggah ke situs web Bank (www.victoriabank.co.id).	Complied The BOC Charter is periodically reviewed, was lastly updated on 10 March 2023, and is already uploaded to the Bank's website (www.victoriabank.co.id).
REKOMENDASI 1.3.11:	RECOMMENDATION 1.3.11:
Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan.	The Board of Commissioners has a policy on resignation of members of the Board of Commissioners if involved in a financial crime and are proven to have made a mistake.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan dituangkan dalam <i>BOC Charter</i> terkait Keanggotaan Dewan Komisaris.	Complied The policy related to the resignation of members of the Board of Commissioners if involved in financial crimes and proven wrongdoing are outlined in the BOC Charter related to the Membership of the Board of Commissioners.
REKOMENDASI 1.3.12:	RECOMMENDATION 1.3.12:
Komisaris independen sangat diharapkan untuk dapat berkontribusi dalam diskusi yang jujur, objektif, aktif, dan konstruktif pada rapat Dewan Komisaris.	Independent commissioners are highly expected to be able to contribute to honest, objective, active, and constructive discussions at the Board of Commissioners' meetings.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Seluruh Komisaris Independen Bank memiliki rekam jejak yang kredibel dan dapat berkontribusi dalam kemajuan Bank.	Complied All of the Bank's Independent Commissioners have credible track records and can contribute to the Bank's progress.

REKOMENDASI 1.3.13:	RECOMMENDATION 1.3.13:
Komisaris Utama berperan sebagai koordinator Dewan Komisaris dan memastikan efektivitasnya. Komisaris Utama mendorong budaya keterbukaan dan dialog konstruktif yang memungkinkan berbagai pandangan diungkapkan, termasuk mengoordinasi penetapan agenda rapat dewan yang tepat dan memastikan waktu yang cukup tersedia untuk mendiskusikan semua agenda. Selain itu, juga harus ada kesempatan bagi Dewan Komisaris untuk bertemu dengan jajaran Direksi dan Manajemen Senior.	The President Commissioner acts as the coordinator of the Board of Commissioners and ensures its effectiveness. The President Commissioner promotes a culture of transparency and constructive dialogue that allows a variety of views to be expressed, including coordinating the setting of appropriate board meeting agenda and ensuring sufficient time is available to discuss all agenda items. In addition, there should be opportunities for the Board of Commissioners to meet with the Board of Directors and Senior Management.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Komisaris Utama Independen Bank memiliki tugas dan tanggung jawab di antaranya mengoordinasikan pelaksanaan tugas dan memberikan pengarahan kepada anggota Dewan Komisaris serta memberikan usulan untuk mengadakan rapat. Selain itu, rapat gabungan Dewan Komisaris dan Direksi dilaksanakan secara berkala.	Complied The Bank's Independent President Commissioner has duties and responsibilities including coordinating the implementation of duties, providing directions to the Board of Commissioners' members, and providing suggestions to conduct meetings. In addition, joint meetings of the Board of Commissioners and Board of Directors are held regularly.
Rekomendasi 1.4: Pembentukan Komite. Recommendation 1.4: Establishment of a Committee.	
REKOMENDASI 1.4.1:	RECOMMENDATION 1.4.1:
Korporasi memiliki komite-komite di bawah Dewan Komisaris sekurang-kurangnya terdiri dari: Komite Audit, Komite Nominasi dan Remunerasi, dan Komite Pemantau Manajemen Risiko.	The Corporation has committees under the Board of Commissioners, consisting of at least: Audit Committee, Nomination and Remuneration Committee, and Risk Management Monitoring Committee.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Komite-komite di tingkat Dewan Komisaris terdiri dari Komite Pemantau Risiko, Komite Nominasi dan Remunerasi, serta Komite Audit.	Complied Committees under the Board of Commissioners consist of the Risk Monitoring Committee, Nomination and Remuneration Committee, and Audit Committee.
REKOMENDASI 1.4.2:	RECOMMENDATION 1.4.2:
Dewan Komisaris memastikan bahwa anggota Komite Audit seluruhnya independen dan komite lain yang dibentuk Dewan Komisaris adalah mayoritas dari pihak independen, serta semua anggota komite memiliki kompetensi, berkomitmen, serta memiliki wewenang yang memadai untuk menjalankan perannya secara efektif dan independen.	The Board of Commissioners ensures that all Audit Committee's members are independent, and majority of members of other committees established by the Board of Commissioners are independent parties, and that all committee members are competent, committed, and have sufficient authority to perform their roles in an effective and independent manner.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Anggota Komite Audit Bank seluruhnya merupakan Komisaris Independen dan pihak independen. Komposisi anggota komite lainnya juga mayoritas merupakan Komisaris Independen dan pihak independen. Hal ini disampaikan lebih detail dalam pembahasan Komite Audit dan komite lainnya masing-masing secara terpisah pada Laporan Tahunan ini.	Complied All members of the Bank's Audit Committee are Independent Commissioners and independent parties. The majority of other committees' members are also Independent Commissioners and independent parties. This is presented in more detail in the discussion of Audit Committee and other committees, each separately in this Annual Report.
REKOMENDASI 1.4.3:	RECOMMENDATION 1.4.3:
Untuk memastikan pemantauan atas pelaksanaan tugas Komite Audit berjalan objektif dan independen, Komisaris Utama tidak boleh menjadi ketua Komite Audit, kecuali dalam keadaan luar biasa yang harus dijelaskan dalam Laporan Tahunan.	To ensure objective and independent monitoring on the implementation of Audit Committee's duties, the President Commissioner is not allowed to be the chairman of Audit Committee, except in exceptional circumstances which must be explained in the Annual Report.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Penjelasan Ketua Komite Audit dijabat oleh Zaenal Abidin, Ph.D yang merupakan Komisaris Utama. Meski demikian, Zaenal Abidin, Ph.D merupakan Komisaris Utama Independen dan Bank menjamin independensinya dalam melaksanakan tugas dan tanggung jawabnya sebagai Ketua Komite Audit.	Explanation The Chairman of Audit Committee is held by Zaenal Abidin, Ph.D, the President Commissioner. Nevertheless, Zaenal Abidin, Ph.D, is an Independent President Commissioner and the Bank guarantees his independence in performing his duties and responsibilities as the Chairman of Audit Committee.

Rekomendasi 1.5: Penilaian Kinerja – Dewan Komisaris dan Anggotanya.
Recommendation 1.5: Performance Assessment – Board of Commissioners and its Members.

REKOMENDASI 1.5.1:	RECOMMENDATION 1.5.1:
Dewan Komisaris melakukan evaluasi formal tahunan secara objektif untuk menentukan efektivitas Dewan, komitenya, dan setiap individu Komisaris.	The Board of Commissioners conducts an annual formal evaluation objectively to determine the effectiveness of the Board, its committees, and each individual Commissioner.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Pelaksanaan penilaian kinerja Dewan Komisaris dan komitenya dilakukan setiap tahun (minimum setahun sekali). Penilaian kinerja Dewan Komisaris dan komitenya menggunakan beberapa kriteria sebagaimana yang tertuang dalam Laporan Tahunan ini.	Complied The performance assessment of the Board of Commissioners and its committees is carried out every year (at least once a year). The performance assessment of the Board of Commissioners and its committees uses several criteria as stated in this Annual Report.

Rekomendasi 1.6: Benturan Kepentingan.
Recommendation 1.6: Conflict of Interest.

REKOMENDASI 1.6.1:	RECOMMENDATION 1.6.1:
Anggota Direksi yang mempunyai rangkap jabatan di luar korporasi, harus mendapatkan persetujuan dari Dewan Komisaris. Seorang Komisaris memberi tahu Dewan Komisaris dan ketua komite yang menjalankan fungsi nominasi, sebelum menerima penunjukan baru sebagai Direktur atau Komisaris dari korporasi terbuka, jabatan Direktur lainnya atau posisi lain dengan komitmen waktu yang signifikan.	Members of the Board of Directors with concurrent positions outside the corporation must obtain approval from the Board of Commissioners. A Commissioner shall notify the Board of Commissioners and the chairman of committee performing nominating function, prior to accepting a new appointment as Director or Commissioner of a publicly listed corporation, other Director positions, or other positions with a significant time commitment.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Tidak ada anggota Direksi Bank yang mempunyai rangkap jabatan di luar Bank Victoria. Anggota Dewan Komisaris yang menerima penunjukan dari perusahaan terbuka lain wajib menyampaikan informasi tersebut kepada Dewan Komisaris dan/atau Komite Nominasi dan Remunerasi.	Complied There are no members of the Bank's Board of Directors with concurrent positions outside Bank Victoria. Members of the Board of Commissioners who receive appointments from other public companies must convey this information to the Board of Commissioners and/or the Nomination and Remuneration Committee.
REKOMENDASI 1.6.2:	RECOMMENDATION 1.6.2:
Dewan Komisaris memantau dan mengelola potensi benturan kepentingan manajemen, anggota Direksi, Dewan Komisaris dan Pemegang Saham, termasuk penyalahgunaan aset korporasi dan penyalahgunaan dalam transaksi pihak berelasi. Komisaris yang memiliki benturan kepentingan tidak turut serta dalam pemantauan dan pengambilan keputusan atas potensi benturan kepentingan yang melibatkan Komisaris atau afiliasi Komisaris yang bersangkutan.	The Board of Commissioners monitors and manages potential conflicts of interest within the management, members of the Board of Directors, Board of Commissioners, and Shareholders, including misuse of corporate assets and misuse of related party transactions. Commissioners with conflicts of interest shall not participate in monitoring and making decisions on matters containing potential conflicts of interest involving the Commissioners or affiliates of the Commissioner concerned.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Dewan Komisaris telah memantau dan mengelola potensi benturan kepentingan Bank. Dalam pelaksanaan tugas dan tanggung jawabnya, seluruh anggota Dewan Komisaris berkomitmen untuk menghindari terjadinya potensi benturan kepentingan atau selalu menempatkan diri untuk tidak berada dalam potensi terjadinya benturan kepentingan dalam situasi apapun sebagaimana tercantum dalam <i>BOC Charter</i> . Dalam hal terjadi benturan kepentingan, anggota Dewan Komisaris dilarang mengambil tindakan yang dapat merugikan atau mengurangi keuntungan Bank dan wajib mengungkapkan potensi benturan kepentingan dimaksud dalam setiap keputusan.	Complied The Board of Commissioners has monitored and managed potential conflicts of interest within the Bank. In performing their duties and responsibilities, all members of the Board of Commissioners are committed to avoiding potential conflicts of interest or always position themselves not to be involved in any situation containing potential conflicts of interest as stated in the BOC Charter. In the event of a conflict of interest, members of the Board of Commissioners are prohibited from taking actions that may harm or reduce the Bank's profits and must disclose the potential conflict of interest referred to in every decision.

Rekomendasi 1.7: Peningkatan Kompetensi Anggota Direksi dan Dewan Komisaris.
Recommendation 1.7: Competency Improvement of Members of the Board of Directors and Board of Commissioners.

REKOMENDASI 1.7.1:	RECOMMENDATION 1.7.1:
Dewan Komisaris memastikan bahwa anggota Direksi dan Dewan Komisaris memahami peran dan tanggung jawab mereka, karakteristik dan operasi korporasi, peraturan perundang-undangan dan standar yang relevan serta kewajiban lain yang berlaku. Direksi melalui Sekretaris Korporasi mendukung semua anggota Direksi dan Dewan Komisaris dalam memperbarui dan menyegarkan keterampilan dan pengetahuan mereka yang diperlukan untuk menjalankan peran mereka di Dewan.	The Board of Commissioners ensures that members of the Board of Directors and Board of Commissioners understand their roles and responsibilities, characteristics and operations of the corporation, relevant laws and regulations, and other applicable standards and obligations. The Board of Directors, through the Corporate Secretary, supports all members of the Board of Directors and Board of Commissioners in updating and refreshing the required skills and knowledge to perform their roles on the Board.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Dewan Komisaris dan Direksi telah mengikuti pendidikan dan pelatihan dengan tujuan untuk meningkatkan kemampuan strategis, menambah pengetahuan bisnis, meningkatkan kepemimpinan, mengembangkan keterampilan baru, serta meningkatkan dan menjaga kualitas layanan perbankan yang dimiliki. Adapun rincian pendidikan dan pelatihan yang diikuti Dewan Komisaris dan Direksi telah tertuang dalam Laporan Tahunan ini.</p>	<p>Complied The Board of Commissioners and Board of Directors have attended education and training programs with the aim of enhancing strategic capabilities, adding business knowledge, enhancing leadership, developing new skills, and improving as well as maintaining the quality of banking services. Details of education and training programs attended by the Board of Commissioners and Board of Directors are presented in this Annual Report.</p>

Prinsip 2: Komposisi dan Remunerasi Direksi dan Dewan Komisaris

Principle 2: Composition and Remuneration of the Board of Directors and Board of Commissioners

Rekomendasi 2.1: Komposisi Direksi dan Dewan Komisaris. Recommendation 2.1: Composition of the Board of Directors and Board of Commissioners.	
<p>REKOMENDASI 2.1.1:</p> <p>Dalam menentukan kandidat calon Direktur, Dewan Komisaris melalui Komite Nominasi dan Remunerasi tidak hanya mengandalkan rekomendasi dari Dewan Komisaris, manajemen atau Pemegang Saham mayoritas. Dewan Komisaris melalui Komite Nominasi dan Remunerasi dapat menggunakan sumber independen untuk menentukan kandidat yang memenuhi syarat.</p>	<p>RECOMMENDATION 2.1.1:</p> <p>In determining Director candidates, the Board of Commissioners, through the Nomination and Remuneration Committee, does not rely solely on recommendations from the Board of Commissioners, management, or majority shareholders. The Board of Commissioners, through the Nomination and Remuneration Committee, may use independent sources to determine qualified candidates.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Penjelasan Saat ini, Bank belum menggunakan jasa pihak ketiga yang independen dalam proses seleksi kandidat Dewan Komisaris. Meskipun demikian, Bank senantiasa memastikan penentuan kandidat calon Dewan Komisaris dan Direksi sesuai dengan aturan yang berlaku dan kualifikasi yang dibutuhkan oleh Bank.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied Currently, the Bank has not used the services of an independent third party in the selection process of Board of Commissioners candidates. Nevertheless, the Bank always ensures that the selection of candidates for the Board of Commissioners and Board of Directors is in accordance with applicable regulations and the qualifications required by the Bank.</p>
<p>REKOMENDASI 2.1.2:</p> <p>Dewan Komisaris memastikan bahwa kriteria dalam menyeleksi anggota Direksi mencakup paling tidak pengetahuan, kemampuan, dan keahlian yang dibutuhkan untuk memenuhi secara tepat peran Direksi serta memperhatikan terpenuhinya keberagaman Direksi.</p>	<p>RECOMMENDATION 2.1.2:</p> <p>The Board of Commissioners ensures that the criteria for selecting members of the Board of Directors include at least the required knowledge, abilities, and expertise to properly meet the role of the Board of Directors and pay attention to the fulfillment of the Board of Directors' diversity.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Dewan Komisaris melalui Komite Nominasi dan Remunerasi memastikan minimum kriteria yang harus dimiliki oleh calon anggota Dewan Komisaris dan Direksi Bank baik dari sisi integritas, kompetensi, reputasi, independensi, atau kriteria khusus lainnya sesuai bidang Direktur.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The Board of Commissioners, through the Nomination and Remuneration Committee, ensures the minimum criteria that must be possessed by candidates of the Bank's Board of Commissioners and Board of Directors in terms of integrity, competence, reputation, independence, or other special criteria according to the respective field of each Director.</p>
<p>REKOMENDASI 2.1.3:</p> <p>Kebijakan korporasi tentang keberagaman pada, Direksi dan Dewan Komisaris diungkapkan dalam Laporan Tahunan.</p>	<p>RECOMMENDATION 2.1.3:</p> <p>The corporate policy on diversity in the Board of Directors and Board of Commissioners is disclosed in the Annual Report.</p>
<p>STATUS DAN PENERAPAN:</p> <p>Terpenuhi Kebijakan keberagaman komposisi Dewan Komisaris dan Direksi telah diungkapkan pada Laporan Tahunan ini.</p>	<p>STATUS AND IMPLEMENTATION:</p> <p>Complied The diversity policy of the composition of the Board of Commissioners and Board of Directors has been disclosed in this Annual Report.</p>
<p>REKOMENDASI 2.1.4:</p> <p>Dewan Komisaris memastikan bahwa kebijakan dan prosedur untuk seleksi dan nominasi Komisaris adalah jelas dan transparan sehingga dapat menghasilkan komposisi Dewan yang diinginkan. Dewan Komisaris menggunakan sumber independen untuk menentukan kandidat yang memenuhi syarat.</p>	<p>RECOMMENDATION 2.1.4:</p> <p>The Board of Commissioners ensures that the policies and procedures for the selection and nomination of Commissioners are clear and transparent so as to produce the desired Board composition. The Board of Commissioners uses independent sources to determine qualified candidates.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Dewan Komisaris dan Komite Nominasi dan Remunerasi telah melakukan fungsi dan tanggung jawabnya dalam memastikan proses nominasi dan remunerasi di Bank berjalan dengan benar dan transparan demi kepentingan Bank.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The Board of Commissioners and the Nomination and Remuneration Committee have performed their functions and responsibilities in ensuring that the nomination and remuneration process at the Bank runs properly and transparently in the interests of the Bank.</p>

<p>REKOMENDASI 2.1.5:</p> <p>Dewan Komisaris/Komite yang menjalankan fungsi nominasi menetapkan prosedur dan kriteria nominasi yang konsisten dengan matriks keahlian Dewan Komisaris yang telah disetujui Dewan Komisaris dan memastikan bahwa profil kandidat memenuhi persyaratan yang ditetapkan dalam matriks keahlian dan kriteria nominasi.</p>	<p>RECOMMENDATION 2.1.5:</p> <p>The Board of Commissioners/Committee that performs the nomination function establishes nomination procedures and criteria, which are consistent with the Board of Commissioners' expertise matrix, which has been approved by the Board of Commissioners, and ensures that the candidate profile meets the established requirements in the expertise matrix and nomination criteria.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Komite Nominasi dan Remunerasi menjalankan fungsi nominasi berdasarkan prosedur dan kriteria nominasi yang tertuang dalam Kebijakan Nominasi No. 003/SK-KOM/09/18 tanggal 20 September 2018 dan disetujui oleh Dewan Komisaris.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The Nomination and Remuneration Committee carries out the nomination function based on the nomination procedures and criteria set out in the Nomination Policy No. 003/SK-KOM/09/18 dated 20 September 2018 and approved by the Board of Commissioners.</p>
<p>REKOMENDASI 2.1.6:</p> <p>Komposisi Dewan Komisaris harus dibentuk sedemikian rupa sehingga anggota-anggotanya secara kelompok mencerminkan keberagaman dalam hal kemampuan, keahlian, pengetahuan, pengalaman, usia, latar belakang budaya, dan gender yang dibutuhkan untuk memenuhi secara tepat peran Dewan Komisaris.</p>	<p>RECOMMENDATION 2.1.6:</p> <p>The Board of Commissioners' composition must be formed in such a way that its members as a group reflect the diversity in terms of abilities, skills, knowledge, experience, age, cultural background, and gender required to properly fulfill the roles of the Board of Commissioners.</p>
<p>STATUS DAN PENERAPAN:</p> <p>Terpenuhi Komposisi anggota Dewan Komisaris telah memperhatikan keberagaman keahlian, pengetahuan dan pengalaman yang dibutuhkan oleh Bank.</p>	<p>STATUS AND IMPLEMENTATION:</p> <p>Complied The composition of the Board of Commissioners has taken into account the diversity of expertise, knowledge and experience required by the Bank.</p>
<p>REKOMENDASI 2.1.7:</p> <p>Untuk memampukan Dewan Komisaris dalam memberikan advis dan supervisi secara independen kepada Direksi dan untuk peran-peran yang terdapat potensi benturan kepentingan, Dewan Komisaris terdiri dari Komisaris Independen yang cukup jumlahnya, dengan masa jabatan yang dibatasi dan terdapat pengungkapan jangka waktu keanggotaan Dewan Komisaris serta independensi mereka dari sudut pandang korporasi.</p>	<p>RECOMMENDATION 2.1.7:</p> <p>To enable the Board of Commissioners to provide independent advice and supervision to the Board of Directors and for roles with potential conflicts of interest, the Board of Commissioners shall consist of a sufficient number of Independent Commissioners, with a limited term of office and disclosure of the term of office of the Board of Commissioners and their independence from a corporate perspective.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Pelaksanaan tugas Dewan Komisaris termasuk komposisi, masa jabatan, independensi, kehadiran rapat dan pelatihan di sepanjang tahun disampaikan secara detail pada Laporan Tahunan ini.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The implementation of the Board of Commissioners' duties, including composition, term of office, independence, meeting attendance, and training throughout the year is presented in detail in this Annual Report.</p>
<p>REKOMENDASI 2.1.8:</p> <p>Untuk memfasilitasi fungsi Direksi dan Dewan Komisaris yang efektif dan guna meningkatkan kepercayaan investor dan pemangku kepentingan, Komite Nominasi dan Remunerasi memastikan bahwa terdapat proses yang formal, ketat, dan transparan untuk penunjukan dan pengangkatan anggota Direksi dan Dewan Komisaris.</p>	<p>RECOMMENDATION 2.1.8:</p> <p>To facilitate effective function of the Board of Directors and Board of Commissioners and to increase investors and stakeholders trust, the Nomination and Remuneration Committee ensures that there is a formal, rigorous, and transparent process for the selection and appointment of members of the Board of Directors and Board of Commissioners.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Komite Nominasi dan Remunerasi juga telah melakukan fungsi dan tanggung jawabnya dalam memastikan proses nominasi dan remunerasi di Bank berjalan dengan benar dan transparan demi kepentingan Bank. Hal ini bisa dilihat pada pembahasan di Laporan Tahunan ini.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The Nomination and Remuneration Committee has also performed its functions and responsibilities in ensuring that the nomination and remuneration process at the Bank runs properly and transparently in the interests of the Bank. This matter can be seen in the discussion in this Annual Report.</p>
<p>Rekomendasi 2.2: Remunerasi Direksi dan Dewan Komisaris. Recommendation 2.2: Remuneration of the Board of Directors and Board of Commissioners.</p>	
<p>REKOMENDASI 2.2.1:</p> <p>Kebijakan remunerasi anggota Direksi terdiri atas struktur remunerasi yang berorientasi pada pengembangan korporasi yang berkelanjutan dan mendorong pencapaian tujuan jangka panjang. Remunerasi Direksi harus diusulkan, dapat dengan melalui Komite Nominasi dan Remunerasi, oleh Dewan Komisaris untuk diputuskan oleh RUPS. Jumlah remunerasi yang diusulkan kepada RUPS tersebut ditetapkan dengan mempertimbangkan peran setiap anggota Direksi dan situasi ekonomi serta kinerja korporasi.</p>	<p>RECOMMENDATION 2.2.1:</p> <p>The remuneration policy for the Board of Directors' members consists of a remuneration structure that is oriented towards sustainable corporate development and encourages the achievement of long-term goals. The Board of Directors' remuneration must be proposed, possibly through the Nomination and Remuneration Committee, by the Board of Commissioners to be resolved by the GMS. The remuneration amount proposed to the GMS is determined by considering the role of each member of the Board of Directors, the economic situation, and the corporate performance.</p>

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Bank memiliki dan menjalankan kebijakan remunerasi berbasis risiko sesuai Keputusan Dewan Komisaris No. 003/SK-KOM/09/18 tanggal 20 September 2018. Kebijakan remunerasi Bank disusun dengan mengedepankan sistem remunerasi yang kompetitif, adil dan seimbang, berdasarkan peraturan perundang-undangan yang berlaku dan dikaji ulang secara berkala.	Complied The Bank has and implements a risk-based remuneration policy in accordance with the Decision of the Board of Commissioners No. 003/SK-KOM/09/18 dated 20 September 2018. The Bank's remuneration policy is prepared by prioritizing a competitive, fair and balanced remuneration system, based on applicable laws and regulations and is reviewed periodically.
REKOMENDASI 2.2.2:	RECOMMENDATION 2.2.2:
Kebijakan remunerasi anggota Dewan Komisaris terdiri atas struktur remunerasi yang berorientasi pada pengembangan korporasi yang berkelanjutan dan mendorong pencapaian tujuan jangka panjang. Jumlah remunerasi yang diusulkan Dewan Komisaris kepada RUPS tersebut ditetapkan dengan mempertimbangkan peran setiap anggota Dewan Komisaris dan situasi ekonomi serta kinerja korporasi. Di samping itu juga harus dipertimbangkan posisinya sebagai Komisaris Utama dan ketua serta keanggotaannya dalam komite-komite.	The remuneration policy for the Board of Commissioners' members consists of a remuneration structure that is oriented towards sustainable corporate development and encourages the achievement of long-term goals. The remuneration amount proposed by the Board of Commissioners to the GMS is determined by considering the role of each member of the Board of Commissioners, the economic situation, and the corporate performance. In addition, it must also consider his/her position as President Commissioner and chairman as well as membership in committees.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Bank menyusun struktur, kebijakan, dan besaran remunerasi masing-masing anggota Dewan Komisaris dengan memperhatikan tugas, wewenang, kinerja, dan tanggung jawab Dewan Komisaris. Bank juga memperhatikan remunerasi yang berlaku di industri sejenis (<i>peers group</i>) dan kemampuan Bank.	Complied The Bank prepares the structure, policies, and remuneration amount for each member of the Board of Commissioners by considering duties, authorities, performance, and responsibilities of the Board of Commissioners. The Bank also pays attention to the remuneration that applies in similar industries (<i>peer groups</i>) as well as the Bank's capabilities.
REKOMENDASI 2.2.3:	RECOMMENDATION 2.2.3:
Untuk memastikan bahwa paket remunerasi ditentukan berdasarkan prestasi, kualifikasi, dan kompetensi Direktur dan Komisaris dengan memperhatikan kinerja operasi korporasi, kinerja individu dan kondisi pasar, Komite Nominasi dan Remunerasi memastikan bahwa terdapat prosedur yang adil dan transparan untuk menetapkan kebijakan remunerasi anggota Direksi dan Dewan Komisaris.	To ensure that the remuneration package is determined based on the achievements, qualifications, and competencies of the Directors and Commissioners by considering the corporate operational performance, individual performance, and market conditions, the Nomination and Remuneration Committee ensures that there are fair and transparent procedures for establishing remuneration policies for members of the Board of Directors and Board of Commissioners.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Komite Nominasi dan Remunerasi melakukan pembahasan atas remunerasi Dewan Komisaris dengan mempertimbangkan skala usaha, kompleksitas usaha, <i>peer group</i> , tingkat inflasi, kondisi dan kemampuan keuangan Bank, dan sesuai dengan peraturan yang berlaku. Selanjutnya, remunerasi Dewan Komisaris dan Direksi ditetapkan oleh RUPS.	Complied The Nomination and Remuneration Committee discusses the remuneration for the Board of Commissioners by considering the business scale, business complexity, <i>peer group</i> , inflation rate, financial condition and capability of the Bank, and in accordance with applicable regulations. Furthermore, the remuneration for the Board of Commissioners and Board of Directors is determined by the GMS.

Prinsip 3: Hubungan Kerja antara Direksi dan Dewan Komisaris

Principle 3: Working Relationship between the Board of Directors and Board of Commissioners

Rekomendasi 3.1: Sifat Hubungan Kerja. Recommendation 3.1: Nature of Working Relationship.	
REKOMENDASI 3.1.1:	RECOMMENDATION 3.1.1:
Terdapat diskusi yang terbuka antara Direksi dengan Dewan Komisaris serta di antara para anggota Direksi dan para anggota Dewan Komisaris. Namun, tetap penting menjaga kerahasiaan informasi agar tidak terjadi kebocoran informasi rahasia.	There are open discussions between the Board of Directors and the Board of Commissioners as well as among members of the Board of Directors and members of the Board of Commissioners. However, it remains important to maintain the confidentiality of information to avoid leakage of confidential information.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Diskusi Dewan Komisaris dan Direksi dapat dilakukan melalui rapat Dewan Komisaris bersama dengan Direksi.	Complied Discussion between the Board of Commissioners and the Board of Directors can be conducted through a joint Board of Commissioners meeting with the Board of Directors.
REKOMENDASI 3.1.2:	RECOMMENDATION 3.1.2:
Sesuai dengan tugas dan perannya masing-masing, Direksi bekerja sama dengan Dewan Komisaris dalam merumuskan misi, visi dan strategi korporasi dan secara reguler membahas pengimplementasiannya.	In accordance with their respective duties and roles, members of the Board of Directors cooperate with those of the Board of Commissioners in formulating corporate missions, visions, and strategies, and regularly discuss their implementation.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Setiap tahun, strategi dan kebijakan Bank dalam jangka pendek dan menengah disusun dalam bentuk Rencana Bisnis Bank (RBB) sesuai dengan Visi dan Misi yang telah ditetapkan. Secara berkala, Direksi bersama Dewan Komisaris beserta jajaran manajemen senior Bank melakukan evaluasi berkala terhadap strategi dan kebijakan Bank serta implementasinya di seluruh level organisasi.</p>	<p>Complied Every year, the Bank's strategy and policies in the short and medium-term are prepared in the form of a Bank Business Plan (RBB) in accordance with the established Vision and Mission. Periodically, the Board of Directors, together with the Board of Commissioners along with the Bank's senior management, evaluates the Bank's strategy and policies and their implementation at all levels of the organization.</p>
<p>REKOMENDASI 3.1.3:</p>	<p>RECOMMENDATION 3.1.3:</p>
<p>Sekretaris Korporasi memiliki peran penting dalam mendukung efektivitas hubungan kerja antara Direksi dengan Dewan Komisaris, mendorong implementasi praktik governansi korporat yang baik, termasuk komunikasi yang efektif dengan Pemegang Saham dan pemangku kepentingan lainnya.</p>	<p>The Corporate Secretary has a crucial role in supporting the effectiveness of working relationship between the Board of Directors and the Board of Commissioners, encouraging the implementation of good corporate governance practices, including effective communication with Shareholders and other stakeholders.</p>
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Bank menunjuk Caprie Ardira Azhar sebagai Kepala Divisi <i>Corporate Secretary</i> berdasarkan Keputusan Direksi No. 012/SK-DIR/HCM/01/21 tanggal 11 Januari 2021. <i>Corporate Secretary</i> Bank bertanggung jawab untuk memelihara citra Bank dan melindungi kepentingan Bank dengan membangun komunikasi dan hubungan baik dengan semua pihak serta sebagai penghubung antara Bank dengan Pemegang Saham dan pemangku kepentingan lainnya.</p>	<p>Complied The Bank appointed Caprie Ardira Azhar as Head of Corporate Secretary Division based on Board of Directors' Decision Letter No. 012/SK-DIR/HCM/01/21 dated 11 January 2021. The Bank's Corporate Secretary is responsible for maintaining the Bank's image and protecting the Bank's interests by establishing good communication and relations with all parties and being a liaison between the Bank and Shareholders and other stakeholders.</p>
<p>Rekomendasi 3.2: Akses informasi Dewan Komisaris. Recommendation 3.2: Access to Information for the Board of Commissioners.</p>	
<p>REKOMENDASI 3.2.1:</p>	<p>RECOMMENDATION 3.2.1:</p>
<p>Direksi bertanggung jawab untuk memastikan Dewan Komisaris mendapatkan akses informasi yang akurat, relevan, dan tepat waktu. Dewan Komisaris sendiri memastikan bahwa ia memperoleh informasi yang memadai. Direksi menyediakan informasi kepada Dewan Komisaris secara teratur, tanpa penundaan, dan secara komprehensif tentang semua masalah yang relevan dengan korporasi. Dewan Komisaris sewaktu-waktu dapat meminta Direksi untuk memberikan informasi tambahan.</p>	<p>The Board of Directors is responsible for ensuring that the Board of Commissioners has access to accurate, relevant, and timely information. The Board of Commissioners itself ensures that it obtains adequate information. The Board of Directors provides information to the Board of Commissioners regularly, without delay, and comprehensively on all matters relevant to the corporation. The Board of Commissioners may at any time request additional information to the Board of Directors.</p>
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Dewan Komisaris dapat berinteraksi dengan Direksi baik secara langsung maupun melalui rapat Dewan Komisaris bersama Direksi. <i>Corporate Secretary</i> juga membantu Direksi menyediakan akses informasi yang akurat, relevan dan tepat waktu kepada Dewan Komisaris serta mengadministrasikan, mendistribusikan dan menindaklanjuti surat masuk yang diterima Bank yang ditujukan kepada Dewan Komisaris dan/atau Direksi.</p>	<p>Complied The Board of Commissioners can interact with the Board of Directors both directly and through the joint meeting of the Board of Commissioners and Board of Directors. The Corporate Secretary also assists the Board of Directors in providing access to accurate, relevant, and timely information to the Board of Commissioners as well as administers, distributes, and follows up incoming letters received by the Bank and addressed to the Board of Commissioners and/or Board of Directors.</p>
<p>Rekomendasi 3.3: Tanggung jawab Direksi dan Dewan Komisaris atas Dampak Struktur. Recommendation 3.3: Responsibilities of the Board of Directors and Board of Commissioners on Impacts of the Structure.</p>	
<p>REKOMENDASI 3.3.1:</p>	<p>RECOMMENDATION 3.3.1:</p>
<p>Dampak struktur kepemilikan terhadap korporasi. Direksi dan Dewan Komisaris mempertimbangkan tanggung jawabnya dalam konteks struktur kepemilikan saham dan hubungan antar-Pemegang Saham korporasi yang mungkin berdampak terhadap pengelolaan dan operasi korporasi.</p>	<p>The impact of ownership structure on the corporation. The Board of Directors and Board of Commissioners consider their responsibilities in the context of shareholding structure and relationships between corporate Shareholders, which may have an impact on corporate management and operations.</p>
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Dewan Komisaris dan Direksi Bank memastikan bahwa struktur Pemegang Saham dan hubungan antar Pemegang Saham tidak memengaruhi pelaksanaan peran dan tanggung jawab Dewan Komisaris dan Direksi Bank. Seluruh keputusan dan kebijakan yang diambil Dewan Komisaris dan Direksi Bank diambil secara independen dan transparan demi kepentingan Bank.</p>	<p>Complied The Bank's Board of Commissioners and Board of Directors ensure that the Shareholder structure and relations between Shareholders do not affect the implementation of roles and responsibilities of the Bank's Board of Commissioners and Board of Directors. All decisions and policies made by the Bank's Board of Commissioners and Board of Directors are taken independently and transparently for the benefit of the Bank.</p>

Prinsip 4: Perilaku Etis dan Bertanggung Jawab

Principle 4: Ethical and Responsible Conduct

Rekomendasi 4.1: Pedoman Etika dan Perilaku.

Recommendation 4.1: Code of Conduct.

REKOMENDASI 4.1.1:	RECOMMENDATION 4.1.1:
<p>Pernyataan ini dituangkan dalam Pedoman Perilaku dan Etika Usaha yang harus secara jelas mengungkapkan harapan korporasi bahwa setiap anggota Direksi dan Dewan Komisaris serta karyawan akan:</p> <ol style="list-style-type: none"> 1. Bertindak untuk kepentingan terbaik korporasi; 2. Bertindak dengan jujur dan dengan integritas berstandar tinggi; 3. Bersikap independen dan bertindak berdasarkan informasi yang lengkap, dengan iktikad baik, dengan uji tuntas dan kehati-hatian; 4. Mematuhi peraturan perundang-undangan yang berlaku bagi korporasi dan operasinya; 5. Menghindari tindakan yang melanggar peraturan perundang-undangan atau tindakan yang tidak etis berdasarkan pedoman etika korporasi; 6. Tidak terlibat atau berpartisipasi dalam kegiatan apa pun yang akan menimbulkan benturan kepentingan dengan kepentingan terbaik korporasi atau yang akan berdampak negatif terhadap reputasi korporasi; 7. Tidak mengambil manfaat atas properti atau informasi yang dimiliki korporasi, kepemilikan aset lainnya atau pelanggannya untuk kepentingan pribadi atau yang menyebabkan kerugian bagi korporasi dan pelanggannya; 8. Tidak memanfaatkan jabatannya atau peluang yang dihasilkan oleh jabatannya untuk kepentingan pribadi; 9. Menghindari perbuatan meminta atau menerima dari pihak ketiga pembayaran, gratifikasi atau keuntungan lain untuk dirinya sendiri atau untuk orang lain yang menimbulkan benturan kepentingan/ memberikan keuntungan kepada pihak ketiga secara melanggar peraturan perundang-undangan; 10. Menghormati perbedaan pendapat dan hak-hak setiap anggota Direksi, Dewan Komisaris, dan karyawan; serta 11. Memastikan pengungkapan yang lengkap, adil, akurat, tepat waktu, dan dapat dipahami dalam laporan dan dokumen yang disampaikan korporasi kepada regulator dan dalam komunikasi publik lainnya. 	<p>This statement is set out in the Code of Conduct and Business Ethics, which must clearly state the corporate expectation that each member of the Board of Directors and Board of Commissioners and employees will:</p> <ol style="list-style-type: none"> 1. Act in the best interests of the corporation; 2. Act honestly and with a high standard of integrity; 3. Be independent and act based on complete information, in good faith, with due diligence and prudence; 4. Comply with laws and regulations that apply to the corporation and its operations; 5. Avoid actions that violate laws and regulations or unethical actions based on corporate ethics guidelines; 6. Not be involved or participate in any activity that will create a conflict of interest with the corporation's best interests or have a negative impact on the corporation's reputation; 7. Not take advantage of property or information owned by the corporation, ownership of other assets or its customers, for personal gain or which causes harm to the corporation and its customers; 8. Not take advantage of the position or opportunities generated by the position for personal gain; 9. Avoid the act of requesting or receiving from third parties payments, gratuities, or other benefits for oneself or for other people that will lead to conflicts of interest / provide benefits to third parties by violating the laws and regulations; 10. Respect differences of opinion and the rights of each member of the Board of Directors, Board of Commissioners, and employees; and 11. Ensure complete, fair, accurate, timely, and understandable disclosure in reports and documents submitted by the corporation to regulators and in other public communications.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Bank memiliki Kode Etik dan kebijakan pencegahan korupsi yang tertuang dalam Keputusan Direksi No. 002/SK-DIR/08/20 tanggal 7 Agustus 2020 tentang Kebijakan dan Standar Operasional Prosedur Penerapan Strategi <i>Anti Fraud</i>, yang wajib ditaati oleh seluruh insan Bank. Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.</p>	<p>Complied The Bank has a Code of Conduct and anti-corruption policy as stated in Board of Directors' Decision Letter No. 002/SK-DIR/08/20 dated 7 August 2020 on Policy and Standard Operating Procedure for Implementing Anti Fraud Strategy, which must be adhered to by all Bank personnel. More detailed information is presented in this Annual Report.</p>
REKOMENDASI 4.1.2:	RECOMMENDATION 4.1.2:
<p>Direksi menetapkan kebijakan dan praktik anti pencucian uang dan pendanaan terorisme, anti suap, antikorupsi, anti kecurangan (<i>anti fraud</i>), keterlibatan dalam politik dengan mengacu pada standar nasional atau internasional mengenai anti pencucian uang, anti suap, antikorupsi, anti kecurangan, atau standar terkait lainnya.</p>	<p>The Board of Directors establishes policies and practices for anti-money laundering and terrorism financing, anti-bribery, anti-corruption, anti fraud, political involvement with reference to the national or international standards regarding anti-money laundering, anti-bribery, anti-corruption, anti-fraud, or other related standards.</p>
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Bank memiliki Kode Etik dan kebijakan pencegahan korupsi yang tertuang dalam Keputusan Direksi No. 002/SK-DIR/08/20 tanggal 7 Agustus 2020 tentang Kebijakan dan Standar Operasional Prosedur Penerapan Strategi <i>Anti Fraud</i>, yang wajib ditaati oleh seluruh insan Bank. Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.</p>	<p>Complied The Bank has a Code of Conduct and anti-corruption policy as stated in Board of Directors' Decision Letter No. 002/SK-DIR/08/20 dated 7 August 2020 on Policy and Standard Operating Procedure for Implementing Anti Fraud Strategy, which must be adhered to by all Bank personnel. More detailed information is presented in this Annual Report.</p>

Rekomendasi 4.2: Nilai-Nilai dan Budaya Organisasi.
Recommendation 4.2: Corporate Values and Culture.

REKOMENDASI 4.2.1:	RECOMMENDATION 4.2.1:
Korporasi mengartikulasikan, menumbuhkan, dan mengungkapkan budaya serta nilai-nilai korporasi.	The corporation articulates, fosters, and discloses corporate culture and values.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Bank menerapkan Nilai Budaya Perusahaan yakni SQEW agar setiap insan Bank dapat menjalankan operasional Bank dengan baik dan mencegah terjadinya berbagai tindakan <i>fraud</i> , pelanggaran peraturan perundang-undangan atau tidak etis. Nilai Budaya Perusahaan telah diungkapkan dalam Laporan Tahunan ini.	Complied The Bank implements the Corporate Culture Values, namely SQEW, so that every Bank personnel can carry out the Bank's operations properly and prevent various acts of fraud, acts that violates laws and regulations, or unethical actions. The Corporate Culture Values have been disclosed in this Annual Report.

Rekomendasi 4.3: Penegakan dan Komunikasi Pedoman Etika, Nilai-Nilai, dan Budaya.
Recommendation 4.3: Enforcement and Communication of the Code of Conduct, Values, and Culture.

REKOMENDASI 4.3.1:	RECOMMENDATION 4.3.1:
Pedoman perilaku dan kode etik korporasi dikomunikasikan secara efektif kepada Direksi, Dewan Komisaris, serta seluruh karyawan, diintegrasikan ke dalam strategi dan operasi korporasi termasuk sistem manajemen risiko dan struktur remunerasi, serta ditegakkan.	The corporate code of conduct and code of ethics are communicated effectively to the Board of Directors, Board of Commissioners, and all employees, integrated into corporate strategy and operations, including risk management system and remuneration structure, and being enforced.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Internalisasi Kode Etik dilakukan secara berkala melalui berbagai media yang tersedia guna menumbuhkan kesadaran dan pemahaman untuk menerapkan perilaku yang sesuai dengan nilai utama Bank. Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.	Complied Internalization of the Code of Conduct is regularly carried out through various available media to raise awareness and understanding to implement behavior that is in line with the Bank's core values. More detailed information is presented in this Annual Report.

Prinsip 5: Manajemen Risiko, Pengendalian Internal, dan Kepatuhan
Principle 5: Risk Management, Internal Control, and Compliance

Rekomendasi 5.1: Pengendalian Internal dan Kepatuhan.
Recommendation 5.1: Internal Control and Compliance.

REKOMENDASI 5.1.1:	RECOMMENDATION 5.1.1:
Direksi melakukan reviu secara berkala atas ketepatan desain dan efektivitas operasional sistem governansi, pengelolaan risiko, pengendalian internal dan kepatuhan korporasi dan melaporkan pelaksanaan dan hasil reviu kepada para Pemegang Saham melalui Laporan Tahunan Korporasi.	The Board of Directors periodically reviews the accuracy of designs and operational effectiveness of the governance system, risk management, internal control, and corporate compliance and reports the implementation and review results to Shareholders through the Corporate Annual Report.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Direksi telah melaksanakan SPI sesuai dengan prinsip-prinsip pengendalian dan evaluasi yang dilakukan Bank secara keseluruhan memperlihatkan kualitas SPI Bank berjalan dengan baik. Dewan Komisaris dan Direksi menyatakan bahwa Bank telah memiliki SPI yang efektif dan memadai dalam mengelola risiko-risiko yang dihadapi Bank tetap berada dalam batas toleransi dalam mendukung pencapaian tujuan Bank yang mana telah disampaikan pada Sistem Pengendalian Internal pada Laporan Tahunan ini.	Complied The Board of Directors has implemented internal control system in accordance with the overall principles of control and evaluation performed by the Bank, which indicates that the quality of the Bank's internal control system is running properly. The Board of Commissioners and Board of Directors state that the Bank has an effective and adequate internal control system in managing the risks faced by the Bank while remaining within the tolerance limit in supporting the achievement of the Bank's objectives, which has been conveyed in the Internal Control System in this Annual Report.

Rekomendasi 5.2: Manajemen Risiko.
Recommendation 5.2: Risk Management.

REKOMENDASI 5.2.1:	RECOMMENDATION 5.2.1:
Strategi dan risiko merupakan satu kesatuan, diungkapkan secara transparan, masuk ke dalam pelaksanaan tugas dan tanggung jawab Direksi dan Dewan Komisaris, serta dalam diskusi di rapat Dewan Komisaris dan Direksi.	Strategy and risk is a unity, disclosed transparently, included in the implementation of duties and responsibilities of the Board of Directors and Board of Commissioners, as well as in discussions at meetings of the Board of Commissioners and Board of Directors.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Dewan Komisaris dan Direksi senantiasa melakukan pengelolaan dan pemantauan risiko-risiko utama Bank dengan baik. Menyeimbangkan antara risiko, budaya kepatuhan dan kecukupan modal juga menjadi kebijakan pilar strategis Bank. Dewan Komisaris dan Direksi dibantu oleh Komite Pemantau Risiko dan Komite Manajemen Risiko secara berkala memantau dan mengkaji efektivitas pengendalian dan pengelolaan risiko di setiap rapat dibantu juga oleh SKAI & Anti Fraud.	Complied The Board of Commissioners and Board of Directors always manage and monitor the Bank's main risks properly. Balancing risk, compliance culture, and capital adequacy is also the Bank's strategic pillar policy. The Board of Commissioners and Board of Directors are assisted by the Risk Monitoring Committee and Risk Management Committee, which regularly monitor and review the effectiveness of risk control and management at each meeting, and are also assisted by the SKAI & Anti Fraud.
REKOMENDASI 5.2.2:	RECOMMENDATION 5.2.2:
Komite Pemantau Manajemen Risiko membantu pelaksanaan tugas Dewan Komisaris dengan menciptakan mekanisme yang transparan, fokus, dan independen dalam pengawasan manajemen risiko korporasi.	The Risk Management Monitoring Committee assists the implementation of the Board of Commissioners' duties by creating a transparent, focused, and independent mechanism for overseeing corporate risk management.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Dewan Komisaris memiliki Komite Pemantau Risiko yang beranggotakan Komisaris Independen dan pihak independen yang kompeten dan memiliki latar belakang sesuai dengan peraturan dan kebutuhan Bank. Komite Pemantau Risiko membantu memastikan bahwa penerapan manajemen risiko Bank tetap memenuhi unsur-unsur kecukupan prosedur dan metodologi pengelolaan risiko, sehingga kegiatan usaha Bank tetap dapat terkendali pada batas/limit yang dapat diterima dan menguntungkan Bank. Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.	Complied The Board of Commissioners has established the Risk Monitoring Committee consisting of Independent Commissioners and independent parties who are competent and have backgrounds in accordance with the Bank's regulations and needs. The Risk Monitoring Committee helps ensure that the Bank's risk management implementation still meets the elements of adequacy of risk management procedures and methodologies, enabling the Bank's business activities to remain under control at acceptable limits while still profitable for the Bank. More detailed information is presented in this Annual Report.
Rekomendasi 5.3: Integrasi Governansi, Manajemen Risiko, dan Kepatuhan. Recommendation 5.3: Integration of Governance, Risk Management, and Compliance.	
REKOMENDASI 5.3.1:	RECOMMENDATION 5.3.1:
Direksi membangun sistem governansi, manajemen risiko, dan kepatuhan (GRC) yang terintegrasi, dengan menangani berbagai ketidakpastian secara terpadu dan dengan integritas yang tinggi, untuk meyakinkan bahwa korporasi dapat mencapai tujuannya.	The Board of Directors establishes an integrated governance, risk management, and compliance (GRC) system, by handling various uncertainties in an integrated manner and with high integrity, to ensure that the corporation can achieve its objectives.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Direksi memastikan adanya koordinasi dan peningkatan kapabilitas di antara sistem utama GRC yang meliputi sistem governansi, manajemen strategi, manajemen kinerja, manajemen risiko, manajemen kepatuhan, dan sistem audit internal agar Bank tetap berada pada jalur yang benar dalam mencapai tujuan.	Complied The Board of Directors ensures coordination and capability building among the main GRC systems, which include governance system, strategic management, performance management, risk management, compliance management, and internal audit system to ensure that the Bank stays on the right track in achieving its objectives.
REKOMENDASI 5.3.2:	RECOMMENDATION 5.3.2:
Direksi memastikan bahwa bagian yang membawahi fungsi kepatuhan tidak merangkap melaksanakan fungsi yang berpotensi menimbulkan benturan kepentingan.	The Board of Directors ensures that the division in charge of the compliance function does not concurrently perform functions that have the potential to cause a conflict of interest.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Direktur Kepatuhan dan Manajemen Risiko serta organ di bawahnya yang membawahi fungsi kepatuhan tidak merangkap melaksanakan fungsi yang berpotensi menimbulkan benturan kepentingan sebagaimana digambarkan dalam Struktur Organisasi Bank dalam Laporan Tahunan ini.	Complied The Director of Compliance and Risk Management and all its sub-organs who oversee the compliance function do not concurrently perform functions that have the potential to cause a conflict of interest as described in the Bank's Organizational Structure in this Annual Report.
Rekomendasi 5.4: Audit Internal. Recommendation 5.4: Internal Audit.	
REKOMENDASI 5.4.1:	RECOMMENDATION 5.4.1:
Dewan Komisaris melalui Komite Audit memantau dan memastikan bahwa fungsi audit internal membantu korporasi untuk mencapai tujuannya dengan membawa pendekatan yang objektif dan disiplin untuk mengevaluasi dan meningkatkan efektivitas manajemen risiko, pengendalian internal, dan governansi korporat.	The Board of Commissioners, through the Audit Committee, oversees and ensures that the internal audit function assists the corporation to achieve its objectives through an objective and disciplined approach to evaluate and improve the effectiveness of risk management, internal control, and corporate governance.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Dewan Komisaris memiliki Komite Audit yang memastikan pelaksanaan tugas audit internal telah dilakukan secara objektif dan independen. Pengangkatan dan pemberhentian Kepala SKAI & Anti Fraud juga memperhatikan rekomendasi dari Komite Audit. Auditor internal juga memiliki akses langsung kepada Komite Audit. Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.</p>	<p>Complied The Board of Commissioners has established the Audit Committee, which ensures that the internal audit duties are performed objectively and independently. The appointment and dismissal of the Head of SKAI & Anti Fraud also considers recommendations from the Audit Committee. The internal audit also has direct access to the Audit Committee. More detailed information is presented in this Annual Report.</p>

Prinsip 6: Pengungkapan dan Transparansi
Principle 6: Disclosure and Transparency

Rekomendasi 6.1: Kebijakan Pengungkapan.
Recommendation 6.1: Disclosure Policy.

REKOMENDASI 6.1.1:	RECOMMENDATION 6.1.1:
<p>Korporasi memiliki kebijakan dan prosedur pengungkapan dan transparansi yang memastikan pengungkapan informasi material dan menjaga informasi sensitif serta rahasia korporasi.</p>	<p>The corporation has disclosure and transparency policies and procedures that ensure disclosure of material information and safeguard sensitive information as well as corporate secrets.</p>

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Bank memiliki Kebijakan Komunikasi dengan Pemegang Saham dan Investor yang diatur dalam Anggaran Dasar Bank, yang mengatur pengungkapan informasi material dan menjaga informasi sensitif serta rahasia, serta kewajiban pengungkapan/keterbukaan informasi berdasarkan peraturan berlaku.</p>	<p>Complied The Bank has a communication policy with Shareholders and investors as set out in the Bank's Articles of Association, which governs the disclosure of material information and safeguarding of sensitive and confidential information, as well as disclosure obligations under applicable regulations.</p>

REKOMENDASI 6.1.2:	RECOMMENDATION 6.1.2:
<p>Hak Pemegang Saham untuk memperoleh secara teratur dan tepat waktu informasi material yang relevan tentang korporasi harus dipenuhi.</p>	<p>Shareholders' rights to obtain regularly and timely relevant material information regarding the corporation must be fulfilled.</p>

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Bank memastikan seluruh Pemegang Saham memiliki hak yang sama dalam menerima informasi material secara benar, tepat waktu, berkala, dan sesuai peraturan yang berlaku.</p>	<p>Complied The Bank ensures that all Shareholders have the same rights in receiving material information correctly, timely, periodically, and in accordance with the applicable regulations.</p>

Rekomendasi 6.2: Laporan Keuangan dan Keberlanjutan.
Recommendation 6.2: Financial Statements and Sustainability Report.

REKOMENDASI 6.2.1:	RECOMMENDATION 6.2.1:
<p>Korporasi mengungkapkan sistem dan prosedur untuk memastikan bahwa Laporan Keuangan Interim yang tidak diaudit atau direviu oleh auditor eksternal secara material adalah akurat, lengkap, dan memberikan investor informasi yang tepat untuk membuat keputusan investasi yang tepat.</p>	<p>The Corporation discloses systems and procedures to ensure that Interim Financial Statements that are not materially audited or reviewed by external auditors are accurate, complete, and provide investors with the appropriate information to make the right investment decisions.</p>

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Bank memiliki sistem dan prosedur yang mengatur pengendalian internal atas pelaporan keuangan, termasuk Laporan Keuangan Interim, peran fungsi manajemen risiko/kepatuhan/pengawasan manajemen dan fungsi audit internal dalam memastikan integritas Laporan Keuangan Interim, dan peran Komite Audit dalam menelaah Laporan Keuangan yang akan dipublikasikan oleh Bank.</p>	<p>Complied The Bank has systems and procedures to regulate internal control over financial reporting, including Interim Financial Statements, the role of risk management/compliance/supervision management function, and internal audit functions to ensure the integrity of Interim Financial Statements, and the role of the Audit Committee in reviewing Financial Statements to be published by Bank.</p>

REKOMENDASI 6.2.2:	RECOMMENDATION 6.2.2:
<p>Komite Audit memastikan kualitas audit Laporan Keuangan yang dilaksanakan oleh auditor eksternal. Kegiatan ini termasuk merekomendasikan penunjukan, penunjukan kembali dan, jika perlu, pemberhentian, serta remunerasi auditor eksternal.</p>	<p>The Audit Committee ensures the quality of audit on Financial Statements conducted by the external auditors. This activity includes recommending the appointment, reappointment, and, if necessary, dismissal and remuneration of the external auditors.</p>

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Komite Audit Bank memastikan kualitas audit Laporan Keuangan yang dilaksanakan oleh auditor eksternal. Kegiatan ini termasuk merekomendasikan penunjukan, penunjukan kembali dan, jika perlu, pemberhentian dan remunerasi auditor eksternal.</p>	<p>Complied The Audit Committee of the Bank ensures the quality of audit on Financial Statements conducted by external auditors. This activity includes recommending the appointment, reappointment, and, if necessary, dismissal and remuneration of the external auditors.</p>

REKOMENDASI 6.2.3:	RECOMMENDATION 6.2.3:
Laporan Keberlanjutan harus disiapkan dan diungkapkan dengan akurat dan disusun sesuai kerangka pelaporan keberlanjutan nasional atau internasional.	The Sustainability Report shall be accurately prepared and disclosed and compiled in accordance with national or international sustainability reporting frameworks.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Penjelasan Laporan Keberlanjutan Bank disusun sesuai kerangka pelaporan keberlanjutan dari Peraturan Otoritas Jasa Keuangan. Meski demikian, pelaporan keberlanjutan Bank telah memuat beberapa kriteria GRI meskipun belum sepenuhnya.	Explanation The Sustainability Report of the Bank is prepared in accordance with the sustainability reporting framework of the Financial Services Authority Regulations. Nevertheless, the Bank's sustainability reporting consists of several GRI criteria, although not fully covered.
REKOMENDASI 6.2.4:	RECOMMENDATION 6.2.4:
Korporasi menerbitkan Laporan Tahunan secara terintegrasi yang menempatkan kinerja historis ke dalam konteks dan menggambarkan risiko, peluang, dan prospek korporasi di masa depan, sehingga membantu Pemegang Saham dan pemangku kepentingan memahami tujuan strategis korporasi dan kemajuannya dalam menciptakan nilai yang berkelanjutan.	The corporation issues an integrated Annual Report that puts historical performance into context and describes the corporation's risks, opportunities, and future prospects, thereby helping Shareholders and stakeholders understand the corporation's strategic objectives and its progress in creating sustainable value.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Laporan Tahunan Bank telah mencantumkan kinerja historis dalam konteks dan menggambarkan risiko, peluang, dan prospek korporasi di masa depan.	Complied The Bank's Annual Report has put historical performance in context and described the risks, opportunities, and future prospects of the corporation.
Rekomendasi 6.3: Diseminasi Informasi. Recommendation 6.3: Dissemination of Information.	
REKOMENDASI 6.3.1:	RECOMMENDATION 6.3.1:
Saluran penyebaran informasi harus menyediakan akses yang setara, tepat waktu, dan relatif murah untuk informasi yang relevan bagi pengguna.	Channels for disseminating Information should provide users with equal, timely, and relatively inexpensive access to relevant information.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Bank secara berkala memperbarui dan memberikan kemudahan akses informasi seputar aktivitas dan kinerja Bank kepada para pemangku kepentingan agar mengetahui kondisi Bank secara jelas dan terbuka. Berbagai kanal komunikasi yang tersedia termasuk media sosial, situs web, e-mail blast dan paparan publik bagi nasabah dan publik, siaran pers, serta kanal komunikasi khusus internal untuk karyawan Bank.	Complied The Bank regularly updates and provides easy access to information regarding the Bank's activities and performance to stakeholders, allowing them to be informed about the Bank's condition in a clear and transparent manner. Various available communication channels include social media, websites, e-mail blasts, and public expose for customers and the public, press releases, as well as a special internal communication channels for the Bank's employees.
REKOMENDASI 6.3.2:	RECOMMENDATION 6.3.2:
Korporasi memastikan bahwa pernyataan tahunan terhadap penerapan Pedoman Umum Governansi Korporat Indonesia, termasuk penjelasan atas penerapan atas masing-masing Rekomendasi dan Panduan tersedia di situs web selama jangka waktu minimal 5 (lima) tahun.	The corporation ensures that an annual statement regarding the implementation of General Guidelines for Indonesian Corporate Governance, including an explanation of the implementation of each Recommendation and Guideline is available on the website for a minimum period of 5 (five) years.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Penjelasan Saat ini, pernyataan terhadap penerapan PUGKI belum tersedia di situs web Bank.	Explanation Currently, a statement on the implementation of PUGKI is not available on the Bank's website.
REKOMENDASI 6.3.3:	RECOMMENDATION 6.3.3:
Untuk korporasi yang terdaftar di pasar modal di yurisdiksi selain yurisdiksi asal, peraturan perundang-undangan atas governansi korporat yang berlaku harus diungkapkan dengan jelas. Dalam hal <i>cross listing</i> , kriteria dan prosedur <i>cross listing</i> , kriteria dan prosedur untuk mengakui persyaratan <i>listing</i> untuk <i>listing</i> utama harus transparan dan didokumentasikan.	For corporations listed on the capital market in jurisdictions other than the jurisdiction of origin, applicable laws and regulations on corporate governance must be clearly disclosed. In the case of cross listing, the criteria and procedures for cross listing, criteria and procedures for recognizing the listing requirements for the primary listing must be transparent and documented.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Bank merupakan entitas usaha yang didirikan di Indonesia dan tunduk terhadap peraturan yang berlaku di Indonesia.	Complied The Bank is a business entity incorporated in Indonesia and is subject to the applicable regulations in Indonesia.

Prinsip 7: Perlindungan terhadap Hak-Hak Pemegang Saham

Principle 7: Protection of Shareholders Rights

Rekomendasi 7.1: Hak Pemegang Saham.

Recommendation 7.1: Shareholders Rights.

REKOMENDASI 7.1.1:	RECOMMENDATION 7.1.1:
Korporasi memiliki suatu kebijakan komunikasi yang memfasilitasi dan mendorong partisipasi Pemegang Saham atau investor.	The corporation has a communication policy that facilitates and encourages shareholder or investor participation.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Bank memiliki kebijakan komunikasi dengan Pemegang Saham dan investor yang diatur dalam Anggaran Dasar Bank.	Complied The Bank has a communication policy with Shareholders and investors as set out in the Bank's Articles of Association.
REKOMENDASI 7.1.2:	RECOMMENDATION 7.1.2:
Korporasi yang merupakan Entitas Induk memastikan bahwa kebijakan governansi korporatnya berlaku bagi Entitas Anak dan Entitas Sepengendali yang di dalamnya investasi korporasi adalah signifikan.	Corporations that are Parent Entities ensure that their corporate governance policies apply to Subsidiaries and Entities under Common Control in which their investment is significant.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Penjelasan Bank memiliki kebijakan komunikasi dengan Pemegang Saham dan investor yang diatur dalam Anggaran Dasar Bank. Saat ini, Bank tidak memiliki Entitas Anak dan Entitas Sepengendali.	Explanation The Bank has a communication policy with Shareholders and investors as stipulated in the Bank's Articles of Association. Currently, the Bank does not have any Subsidiaries and entities under common control.
REKOMENDASI 7.1.3:	RECOMMENDATION 7.1.3:
Korporasi memiliki aturan dan prosedur yang mengatur akuisisi, pengambil alihan, dan transaksi luar biasa, seperti merger dan penjualan aset korporasi yang substansial untuk memastikan transaksi terjadi secara transparan dan dalam kondisi yang wajar dan melindungi hak-hak semua Pemegang Saham sesuai dengan kelasnya.	Corporations have rules and procedures that govern acquisitions, takeovers, and extraordinary transactions, such as mergers and sales of substantial corporate assets to ensure that the transactions occur in a transparent manner and under reasonable conditions as well as protecting the rights of all Shareholders according to class.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Anggaran Dasar Bank telah mengatur prosedur yang mengatur akuisisi, pengambil alihan, dan transaksi luar biasa. Selain itu, hak, wewenang, dan tanggung jawab Pemegang Saham juga diatur secara rinci dalam Anggaran Dasar yang dapat diakses juga di situs web Bank (www.victoriabank.co.id).	Complied The Bank's Articles of Association has set out procedures that govern acquisitions, takeovers, and extraordinary transactions. In addition, the rights, authorities, and responsibilities of Shareholders are also stipulated in detail in the Articles of Association, accessible on the Bank's website (www.victoriabank.co.id).

Rekomendasi 7.2: Perlakuan Adil Terhadap Pemegang Saham.

Recommendation 7.2: Fair Treatment to Shareholders.

REKOMENDASI 7.2.1:	RECOMMENDATION 7.2.1:
Korporasi memiliki aturan dan prosedur yang memastikan: 1. Semua Pemegang Saham dari seri yang sama dalam 1 (satu) kelas saham harus diperlakukan setara; serta 2. Pengungkapan aturan dan prosedur tersebut serta pengungkapan struktur modal dan pengaturan yang memungkinkan Pemegang Saham tertentu memperoleh pengaruh atau kendali yang tidak proporsional dengan kepemilikan sahamnya.	Corporations have rules and procedures ensuring that: 1. All Shareholders of the same series in 1 (one) class of shares shall be treated equally; and 2. There shall be disclosure of such rules and procedures, as well as disclosure of capital structure and arrangements that allow certain Shareholders to gain influence or control that is disproportionate to their share ownership.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Sesuai dengan Anggaran Dasar Bank, seluruh saham Bank adalah saham atas nama. Seluruh Pemegang Saham memiliki hak yang sama, yakni masing-masing saham memiliki hak atas 1 (satu) suara.	Complied Pursuant to the Bank's Articles of Association, all shares of the Bank are proprietary shares. All Shareholders have the same rights, in which each share has the right to cast 1 (one) vote.
REKOMENDASI 7.2.2:	RECOMMENDATION 7.2.2:
Korporasi memiliki aturan dan prosedur yang memastikan transaksi pihak berelasi disetujui dan dilaksanakan sedemikian rupa yang dapat meyakinkan bahwa benturan kepentingan telah dikelola dengan tepat, dan melindungi kepentingan korporasi dan Pemegang Saham.	The corporation has rules and procedures that ensure related party transactions are approved and implemented in such a way as to ensure that conflicts of interest are properly managed, and protect the interests of the corporation and Shareholders.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Bank senantiasa memastikan transaksi pihak berelasi yang dilaksanakan tidak memiliki benturan kepentingan serta kepentingan Bank dan Pemegang Saham telah terlindungi.</p>	<p>Complied The Bank always ensures that the related-party transactions made do not have conflicts of interest and that the interests of the Bank and Shareholders are protected.</p>
<p>REKOMENDASI 7.2.3:</p> <p>Korporasi memiliki dan mengungkapkan kebijakan untuk mencegah terjadinya <i>insider trading</i>. Korporasi memiliki aturan yang jelas mengenai perdagangan apa pun dalam saham korporasi yang dilakukan oleh Direktur, Komisaris dan orang dalam untuk memastikan bahwa siapa pun tidak boleh mendapatkan keuntungan secara langsung atau tidak langsung dari informasi yang tidak/belum tersedia di pasar.</p>	<p>RECOMMENDATION 7.2.3:</p> <p>The corporations has and discloses policies to prevent insider trading. The corporation has clear rules regarding any trading in corporate shares conducted by Directors, Commissioners, and insiders to ensure that no one may benefit directly or indirectly from information that is not/not yet available in the market.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Pengungkapan untuk mencegah terjadinya <i>insider trading</i> salah satunya tertuang dalam Kode Etik.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied Disclosure to prevent insider trading, one of which is set out in the Code of Conduct.</p>
<p>Rekomendasi 7.3: Rapat Umum Pemegang Saham. Recommendation 7.3: General Meeting of Shareholders.</p>	
<p>REKOMENDASI 7.3.1:</p> <p>Korporasi melakukan panggilan RUPS dengan agenda dan materi RUPS selengkap dan sedini mungkin (paling lambat 28 hari sebelum RUPS) untuk memberikan waktu dan materi yang cukup bagi Pemegang Saham untuk mempelajari dengan baik agenda rapat. Undangan rapat dan seluruh informasi RUPS diungkapkan melalui sarana elektronik seperti melalui situs web korporasi.</p>	<p>RECOMMENDATION 7.3.1:</p> <p>The corporation makes a notice for GMS with the agenda and materials for GMS as completely and as early as possible (no later than 28 days prior to the GMS) to provide sufficient time and materials for Shareholders to properly study the meeting agenda. Meeting invitations and all GMS information are disclosed through electronic means, such as through the corporate website.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Bank mengumumkan panggilan RUPS paling lambat 28 hari sebelum tanggal pelaksanaan RUPS, dengan tidak memperhitungkan tanggal pemanggilan. Informasi lengkap mengenai agenda dan materi RUPS juga tersedia di situs web Bank.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The Bank announces the notice for GMS no later than 28 days prior to the date of the GMS, regardless the date of the notice. Complete information regarding the GMS agenda and materials is also available on the Bank's website.</p>
<p>REKOMENDASI 7.3.2:</p> <p>Korporasi memiliki dan mengungkapkan aturan dan prosedur yang memfasilitasi Pemegang Saham dalam berpartisipasi dan memberikan suara secara efektif di RUPS.</p>	<p>RECOMMENDATION 7.3.2:</p> <p>The Corporation has and discloses rules and procedures that facilitate Shareholders to participate and vote effectively at the GMS.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Mekanisme pengambilan keputusan/pemungutan suara RUPS disampaikan dalam Tata Tertib RUPS yang disampaikan di situs web Bank dan dibacakan kembali oleh <i>Corporate Secretary</i> pada saat dimulainya RUPS. Pemungutan suara dilakukan untuk masing-masing agenda RUPS Tahunan dan menunjuk pihak independen, Biro Administrasi Efek dan Notaris untuk melakukan perhitungan suara.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The GMS resolutions adoption/voting mechanism is presented in the GMS Conduct, which is posted on the Bank's website and read back by the Corporate Secretary at the commencement of the GMS. Voting is carried out for each Annual GMS agenda item and independent parties, such as the Share Registrar Bureau and Notary, are appointed to count the votes.</p>
<p>REKOMENDASI 7.3.3:</p> <p>Pemegang Saham berpartisipasi efektif dalam menetapkan penunjukan anggota Direksi dan Dewan Komisaris.</p>	<p>RECOMMENDATION 7.3.3:</p> <p>Shareholders participate effectively to determine the appointment of members of the Board of Directors and Board of Commissioners.</p>
<p>STATUS DAN KETERANGAN:</p> <p>Terpenuhi Riwayat hidup kandidat anggota Dewan Komisaris dan Direksi disampaikan bersamaan dengan panggilan RUPS Tahunan kepada publik melalui situs web Bank, dan pemungutan suara juga dilakukan secara terpisah untuk masing-masing kandidat.</p>	<p>STATUS AND DESCRIPTION:</p> <p>Complied The curriculum vitae of candidates for members of the Board of Commissioners and Board of Directors are submitted together with the notice to the Annual GMS to the public through the Bank's website, and voting is also carried out separately for each candidate.</p>
<p>REKOMENDASI 7.3.4:</p> <p>Korporasi memastikan transparansi dan akuntabilitas auditor eksternal di RUPS.</p>	<p>RECOMMENDATION 7.3.4:</p> <p>The corporation ensures transparency and accountability of the external auditor at the GMS.</p>

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Bank menjamin keterbukaan dan akuntabilitas auditor eksternal pada RUPS dan melaksanakan proses pemungutan suara untuk menentukan penunjukan auditor eksternal.</p>	<p>Complied The Bank guarantees transparency and accountability of the external auditors at the GMS and carries out voting to determine the appointment of external auditors.</p>
<p>REKOMENDASI 7.3.5: Penyampaian hasil pemungutan suara dan ringkasan risalah RUPS secara lengkap diumumkan ke publik pada hari kerja berikutnya.</p>	<p>RECOMMENDATION 7.3.5: Submission of voting results and a complete summary of the GMS minutes are announced to the public on the following working day.</p>
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Hasil pemungutan suara dan ringkasan risalah RUPS Bank secara lengkap diumumkan ke publik di hari yang sama setelah selesainya RUPS melalui situs web Bank.</p>	<p>Complied The voting results and complete summary of the minutes of the Bank's GMS are announced to the public on the same day after the completion of the GMS through the Bank's website.</p>

Prinsip 8: Penghargaan terhadap Pemangku Kepentingan
Principle 8: Award for Stakeholders

Rekomendasi 8.1: Keterlibatan Pemangku Kepentingan Kunci (Stakeholder Engagement).
Recommendation 8.1: Key Stakeholder Engagement.

REKOMENDASI 8.1.1:	RECOMMENDATION 8.1.1:
<p>Korporasi melalui Sekretaris Korporasi melaksanakan komunikasi yang reguler, transparan dan efektif dengan pemangku kepentingan kunci serta melibatkan mereka untuk memahami harapan dan keluhan mereka serta dampak korporasi terhadap mereka.</p>	<p>The corporation, through the Corporate Secretary, carries out regular, transparent, and effective communication with key stakeholders and engages them to understand their expectations, grievances, and the impact of the corporation on them.</p>
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Bank mengungkapkan proses dalam mengidentifikasi dan memilih pemangku kepentingan kunci yang akan dilibatkan telah diungkapkan dalam Laporan Tahunan. Bank juga memiliki WBS sebagai sarana penyampaian saran, masukan dan keluhan/pengaduan yang aman dan independen.</p>	<p>Complied The Bank discloses the process of identifying and selecting key stakeholders to be involved, which has been disclosed in the Annual Report. The Bank also has established a WBS as a safe and independent means of conveying suggestions, input, and grievances/complaints.</p>

Rekomendasi 8.2: Integrasi Keberlanjutan dalam Model Bisnis.
Recommendation 8.2: Integration of Sustainability in Business Models.

REKOMENDASI 8.2.1:	RECOMMENDATION 8.2.1:
<p>Dewan Komisaris bersama-sama dengan Direksi bertanggung jawab, akuntabel, dan transparan atas governansi keberlanjutan, termasuk menetapkan strategi, prioritas, dan target keberlanjutan korporasi. Direksi dan Dewan Komisaris memasukkan pertimbangan keberlanjutan ketika menjalankan perannya, termasuk antara lain dalam pengembangan dan implementasi strategi korporasi, rencana bisnis, rencana aksi utama dan manajemen risiko.</p>	<p>The Board of Commissioners and the Board of Directors are responsible, accountable, and transparent for sustainability governance, including in establishing corporate sustainability strategies, priorities, and targets. The Board of Directors and Board of Commissioners incorporate sustainability considerations when performing their roles, including by developing and implementing corporate strategies, business plans, main action plans, and risk management.</p>
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Direksi memastikan bahwa strategi, prioritas dan target keberlanjutan korporasi serta kinerja terhadap target ini dikomunikasikan kepada para pemangku kepentingan sebagaimana dilaporkan dalam Laporan Tahunan ini.</p>	<p>Complied The Board of Directors ensures that corporate sustainability strategies, priorities, and targets, as well as performance against such targets are communicated to stakeholders as reported in this Annual Report.</p>

Rekomendasi 8.3: Perlindungan terhadap Pemangku Kepentingan.
Recommendation 8.3: Protection for Stakeholders.

REKOMENDASI 8.3.1:	RECOMMENDATION 8.3.1:
<p>Direksi memastikan dan mengungkapkan bahwa operasi korporasi mencerminkan penerapan standar etika, tanggung jawab sosial dan lingkungan yang tinggi di seluruh korporasi dan memastikan bahwa kebijakan dan prosedur yang tepat diterapkan untuk menghormati serta mematuhi hak-hak pemangku kepentingan.</p>	<p>The Board of Directors ensures and discloses that corporate operations reflect the application of high standards of ethics, social and environmental responsibility throughout the corporation and ensures that appropriate policies and procedures are in place to respect and comply with stakeholders rights.</p>
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
<p>Terpenuhi Bank memiliki berbagai kebijakan sebagai pedoman dalam menjalankan operasi bisnis yang sesuai etika, tanggung jawab sosial dan lingkungan, serta menghormati dan mematuhi hak-hak pemangku kepentingan. Hal ini disampaikan secara lengkap pada Laporan Tahunan Bank.</p>	<p>Complied The Bank has various policies as guidelines in carrying out business operations that are ethical, socially, and environmentally responsible, and respecting and complying with the stakeholders rights. This is presented completely in the Bank's Annual Report.</p>

REKOMENDASI 8.3.2:	RECOMMENDATION 8.3.2:
Direksi mendorong karyawan bekerja untuk kepentingan jangka panjang korporasi dan mengedepankan keberlanjutan.	The Board of Directors encourages employees to work for the long-term interests of the corporation and prioritizes sustainability.
STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Guna mendorong penciptaan nilai yang berkelanjutan, Bank memiliki kebijakan pemberian insentif jangka panjang kepada karyawan berdasarkan Keputusan Direksi No. 001A/SK-DIR/12/22 tanggal 1 Desember 2022 tentang Kebijakan dan Prosedur <i>Human Capital Management</i> .	Complied In order to encourage sustainable value creation, the Bank has a policy of providing long-term incentives to employees based on Board of Directors Decree No. 001A/SK-DIR/12/22 dated 1 December 2022 concerning Human Capital Management Policies and Procedures.

Rencana Strategis Bank

Bank's Strategic Plans

Bank selalu mengevaluasi strategi jangka pendek, menengah, dan panjang yang dituangkan dalam Rencana Bisnis Bank (RBB). RBB 2024-2026 disusun dengan merujuk pada Peraturan Otoritas Jasa Keuangan No. 5/POJK.03/2016. Penyusunan RBB juga memperhitungkan faktor eksternal dan internal, prinsip kehati-hatian, manajemen risiko, dan asas perbankan yang sehat.

Pada tahun 2023, Bank telah menetapkan rencana strategis untuk rencana jangka panjang (*corporate plan*) dan rencana jangka menengah dan pendek (*business plan*) yang tertuang dalam RBB 2024-2026 yang mengangkat tema tema “*Continuous Transformation With Strong Governance and Excellence Services for Sustainable Growth*” dengan penjelasan sebagai berikut:

Rencana Jangka Panjang

Bank Victoria telah merumuskan strategi-strategi untuk mencapai Visi dan Misi dalam kurun waktu 5 (lima) tahun mendatang, yaitu:

1. Menjaga dan memperkuat penerapan prinsip-prinsip GCG secara konsisten yang selaras dengan prinsip-prinsip manajemen risiko dan kepatuhan terhadap regulasi (*compliance*);
2. Menjaga dan memelihara permodalan di level yang kuat dan memadai sebagai landasan pengembangan dan pertumbuhan skala bisnis Bank yang *prudent* dan berkelanjutan;
3. Melanjutkan dan meningkatkan inovasi produk dan layanan terbaik yang berfokus kepada nasabah (*customer-centric*);
4. Melanjutkan pengembangan sistem teknologi informasi untuk mendukung efisiensi, inovasi, dan pengembangan produk serta peningkatan layanan;
5. Melanjutkan optimalisasi melalui evaluasi kinerja jaringan kantor cabang guna meningkatkan efisiensi dan produktivitas dalam rangka mencapai pertumbuhan bisnis yang berkelanjutan;
6. Mengembangkan kualitas dan meningkatkan produktivitas sumber daya manusia dan pelayanan nasabah untuk menghadapi tantangan bisnis; dan
7. Meningkatkan nilai perusahaan bagi Pemegang Saham dan pemangku kepentingan.

The Bank constantly evaluates the short-, medium-, and long-term strategies as outlined in the Bank's Business Plan (RBB). The 2024-2026 RBB is prepared by referring to the Financial Services Authority Regulation No. 5/POJK.03/2016. The preparation of RBB also considers external and internal factors, prudential principle, risk management, and sound banking principles.

In 2023, the Bank has set a strategic plan for the long-term plan (*corporate plan*) and the medium and short-term plan (*business plan*) contained in the RBB 2024-2026 with the theme “*Continuous Transformation With Strong Governance and Excellence Services for Sustainable Growth*” with the following explanation:

Long-Term Plan

Bank Victoria has formulated strategies to achieve the Vision and Mission within 5 (five) years, as follows:

1. Maintain and strengthen the consistent implementation of GCG principles that are aligned with the principles of risk management and regulatory compliance;
2. Maintain and preserve capital at a strong and adequate level as the foundation for prudent and sustainable development and growth of the Bank's business scale;
3. Continue and improve product innovation and best customer-centric services;
4. Continue the development of information technology systems to support efficiency, innovation, and product development as well as service improvement;
5. Continue optimization through performance evaluation of branch office network to improve efficiency and productivity in order to achieve sustainable business growth;
6. Develop the quality and improve the productivity of human resources and customer service to face business challenges; and
7. Increase corporate value for shareholders and stakeholders.

Rencana Jangka Menengah dan Pendek

Bank menetapkan target jangka pendek untuk setahun ke depan dan target jangka menengah untuk 3 (tiga) tahun mendatang yang diuraikan sebagai berikut:

1. Penguatan GCG dan penerapan manajemen risiko, meliputi:
 - a. Melanjutkan peningkatan internalisasi budaya kepatuhan secara berkelanjutan di seluruh aspek operasional dan bisnis Bank;
 - b. Melanjutkan penguatan fungsi pengawasan dan pengendalian risiko pada *second* dan *third line of defense*; dan
 - c. Menciptakan pertumbuhan bisnis berkelanjutan yang dicapai dengan penerapan dan pengelolaan GCG;
2. Permodalan, yaitu dengan memperkuat dan/atau memelihara permodalan yang sehat guna menyerap risiko dan mendukung pertumbuhan bisnis yang berkelanjutan melalui peningkatan laba (organik) dan penerbitan obligasi subordinasi.
3. Pengembangan bisnis, meliputi:
 - a. Menerbitkan 12 (dua belas) produk dasar dan 21 (dua puluh satu) produk lanjutan 5 (lima) produk lanjutan, 8 (delapan) produk lanjutan layanan elektronik, dan 8 (delapan) produk lanjutan layanan digital guna mendorong pertumbuhan bisnis yang berkelanjutan dan pengembangan produk (*customer-centric*) serta meningkatkan *fee-based income*;
 - b. Meningkatkan kampanye pemasaran (*marketing campaign*) guna memperluas basis nasabah simpanan terutama nasabah kecil untuk meningkatkan porsi dana murah serta menekan *cost of fund*;
 - c. Melanjutkan inisiatif-inisiatif kerja sama dalam pengembangan bisnis penyumbang *fee-based income* lain pada produk dan layanan *wealth management*; dan
 - d. Meningkatkan efektivitas penanganan kredit bermasalah, kredit hapus buku, penyelesaian agunan yang diambil alih serta pemanfaatan aktiva tetap yang belum digunakan (properti terbengkalai) guna memelihara dan meningkatkan kualitas serta mengoptimalkan produktivitas aktiva dan meningkatkan pendapatan operasional selain bunga;
4. Sistem teknologi informasi, yaitu dengan memperkuat kapasitas dan kualitas layanan infrastruktur TI yang bisa menjamin keamanan dan menjaga kepercayaan nasabah guna mendukung kegiatan operasional;
5. Jaringan kantor, meliputi:
 - a. Melanjutkan peningkatan evaluasi kinerja jaringan kantor cabang yang ada guna mencapai tingkat profitabilitas yang menguntungkan; dan
 - b. Melakukan penambahan jaringan kantor untuk meningkatkan layanan nasabah serta memperluas pasar secara geografis dalam mendukung bisnis;
6. Sumber daya manusia dan organisasi, meliputi:
 - a. Meningkatkan kualitas sumber daya manusia, penguatan perangkat organisasi melalui program pelatihan yang berkelanjutan, dan rekrutmen tenaga sesuai kebutuhan bisnis Bank dan regulasi; dan

Medium and Short-Term Plans

The Bank sets its short-term targets for the next one year and medium-term targets for the next 3 (three) years, as follows:

1. Strengthening GCG and risk management implementation, including:
 - a. Continuing to improve the internalization of compliance culture in all aspects of the Bank's operations and business;
 - b. Continuing to strengthen the supervision and risk control functions at the second and third lines of defense; and
 - c. Creating sustainable business growth achieved through the implementation and management of GCG;
2. Capital, namely by strengthening and/or maintaining healthy capital to absorb risks and support sustainable business growth through increased (organic) profits and issuance of subordinated bonds.
3. Business development, including:
 - a. Issuing 12 (twelve) basic products and 21 (twenty one) advanced products 5 (five) advanced products, 8 (eight) electronic service advanced products, and 8 (eight) digital service advanced products) to encourage sustainable business growth and product development (*customer-centric*) and increase *fee-based income*;
 - b. Enhance marketing campaigns to expand the deposit customer base, especially small customers, to increase the portion of low-cost funds and reduce the cost of funds;
 - c. Continue collaborative initiatives in developing other *fee-based income* contributing businesses in wealth management products and services; and
 - d. Improve the effectiveness of handling non-performing loans, write-off loans, settlement of repossessed collateral and utilization of unused fixed assets (abandoned properties) to maintain and improve the quality and optimize asset productivity and increase operating income other than interest;
4. Information technology systems, namely by strengthening the capacity and quality of IT infrastructure services that can ensure security and maintain customer confidence to support operational activities;
5. Office network, including:
 - a. Continuing to improve the performance evaluation of the existing branch office network in order to achieve a favorable level of profitability; and
 - b. Expand the office network to improve customer service and expand the market geographically to support the business;
6. Human resources and organization, including:
 - a. Improving the quality of human resources, strengthening organizational tools through continuous training programs, and recruitment of personnel according to the Bank's business needs and regulations; and

- b. Meningkatkan kualitas sumber daya manusia dalam kompetisi yang dinamis melalui peningkatan *softskill* dan *hardskill*, program rekrutmen (*Officer Development Program*) dan pelatihan terencana dalam kurun waktu 3 (tiga) bulan sekali dan terpadu seperti kewajiban pemenuhan sertifikasi dan *refreshment*;
- 7. Menjaga dan meningkatkan nilai perusahaan bagi seluruh Pemegang Saham dan pemangku kepentingan.

- b. Improving the quality of human resources in a dynamic competition through the improvement of soft skills and hard skills, recruitment programs (*Officer Development Program*) and planned training within a period of 3 (three) months and integrated such as the obligation to fulfill certification and refreshment;
- 7. Maintain and increase the value of the company for all Shareholders and stakeholders.

Pembelian Kembali Saham dan/atau Obligasi Shares and/or Bonds Buy Back

Sepanjang tahun 2023, Bank Victoria tidak melakukan pembelian kembali saham maupun obligasi.

Throughout 2023, Bank Victoria did not conduct shares or bonds buy back.

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 penyediaan dana kepada pihak terkait dan debitur dalam jumlah besar. Prinsip tersebut diimplementasikan melalui peninjauan mekanisme pelaksanaan sesuai kebijakan internal, mematuhi ketentuan Bank Indonesia mengenai Batas Maksimum Pemberian Kredit, dan diputuskan Dewan Komisaris secara independen.

The Bank implements the principle of prudence in providing funds to related party and debtors with large exposure, by reviewing the implementation mechanisms according to internal policies, complying with Bank Indonesia regulations on Legal Lending Limit Aspect, and having the decision made by the Board of Commissioners independently.

Pada tahun 2023, penyediaan dana kepada pihak terkait Bank dan juga terhadap debitur inti Bank (tidak terkait) sebagai berikut:

In 2023, the provision of funds to the Bank's related parties and also to the Bank's core debtors (non-related) are as follows:

Penyediaan Dana Provision of Fund	Debitur Debtor	Total (juta Rupiah / million Rupiah)
Individu Individual	900	21,973,320
Kepada Pihak Terkait To Related Parties	20	361,764
Kepada Pihak Tidak Terkait To Non-Related Parties	880	21,611,556
Kelompok Group	36	6,059,892
Total	936	28,033,212

Kepatuhan Perpajakan **Tax Compliance**

Bank Victoria berkomitmen untuk mematuhi perundang-undangan dan ketentuan yang berlaku. Bentuk kepatuhan tersebut salah satunya diwujudkan dengan memenuhi kewajiban untuk membayar pajak. Bank wajib melakukan pemotongan/pemungutan pajak terhadap setiap objek kena pajak, seperti Pajak Penghasilan (PPH) karyawan dan Pajak Pertambahan Nilai dan lain-lain (PPN). Bank juga menyampaikan dokumen kewajiban perpajakan, seperti Surat Pemberitahuan Pajak (SPT) tahunan maupun bulanan, serta dokumen kewajiban ke lembaga regulator dengan tepat waktu. Jumlah pajak yang dibayarkan Bank selama tahun 2023 dapat dilihat pada bab Analisis dan Pembahasan Manajemen bagian Kontribusi kepada Negara.

Bank Victoria is committed to complying with the applicable laws and regulations, one of which is realized by fulfilling the obligation to pay taxes. The Bank is required to withhold/collect tax on every taxable object, such as employee Income Tax (PPH), Value Added Tax (VAT), and others. The Bank also submits tax obligation documents, such as annual and monthly Tax Returns (SPT), and obligation documents to regulatory institutions in a timely manner. The amount of tax paid by the Bank throughout 2023 can be seen in the Management Discussion and Analysis chapter in the Contribution to the State section.

Transparansi Kondisi Keuangan dan Non-Keuangan Bank yang Belum Diungkap dalam Laporan Lain

Transparency of the Bank's Financial and Non-Financial Conditions that Have Not Been Disclosed in Other Report

Bank telah melakukan transparansi terhadap Laporan Tahunan (keuangan dan non-keuangan) serta Laporan Keuangan Publikasi Triwulanan dan Laporan Keuangan Publikasi Bulanan dengan tepat waktu dan dipublikasikan di situs web Bank.

The Bank has carried out transparency on the (financial and non-financial) Annual Report as well as Quarterly Published Financial Statements and Monthly Published Financial Statements in a timely manner and published on the Bank's website.

Informasi Lain terkait Tata Kelola Bank **Other Information related to Bank Governance**

Bank berupaya untuk mengelola dan menjalankan kegiatan bisnis dengan baik dan bersih, tanpa adanya intervensi dari pemilik ataupun pihak lainnya, serta perselisihan internal ataupun permasalahan lain, khususnya yang muncul sebagai dampak kebijakan remunerasi yang diterapkan oleh Bank. Sepanjang tahun 2023, Bank telah melakukan proses bisnis sesuai dengan pedoman pada prinsip-prinsip GCG, Kode Etik, Peraturan Perusahaan, serta peraturan perundang-undangan yang berlaku untuk mengurangi dampak negatif yang dihasilkan dari keputusan dan aktivitas operasional Bank.

The Bank strives to manage and carry out business activities properly and cleanly, without any intervention from the owner or other parties, as well as internal disputes or other problems, particularly those that arise as a result of the remuneration policies applied by the Bank. Throughout 2023, the Bank carried out business processes in accordance with guidelines on GCG principles, Code of Conduct, Company Regulations, and applicable laws and regulations to reduce negative impacts resulting from the Bank's operational decisions and activities.

Pernyataan dan Praktik *Bad Corporate Governance*

Statement and Practices of Bad Corporate Governance

Bank berkomitmen untuk menjalankan aktivitas bisnis perbankan yang bersih dan sehat, sehingga terhindar dari pelaksanaan aktivitas bisnis dan penerapan tata kelola yang tidak baik. Komitmen tersebut diungkapkan dengan pemenuhan aspek dari pernyataan dan praktik *bad corporate governance* berikut:

The Bank is committed to carrying out clean and sound banking business activities, and therefore, avoid bad business activities and bad governance implementation. This commitment is disclosed by fulfilling aspects of the statement and practices of bad corporate governance as follows:

Uraian	Praktik Practice	Description
Adanya laporan sebagai Bank yang mencemari lingkungan.	Nihil None	There is a report that the Bank pollutes the environment.
Perkara penting yang sedang dihadapi oleh Bank, anggota Direksi dan/atau anggota Dewan Komisaris yang sedang menjabat tidak diungkapkan dalam Laporan Tahunan.	Nihil None	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.
Ketidakpatuhan dalam pemenuhan kewajiban perpajakan.	Nihil None	Non-compliance in fulfilling tax obligations.
Ketidaksesuaian penyajian Laporan Tahunan dan Laporan Keuangan dengan peraturan yang berlaku dan Standar Akuntansi Keuangan.	Nihil None	Inconsistency of presentation of Annual Report and Financial Statements with the applicable regulations and Financial Accounting Standards.
Kasus terkait buruh dan karyawan.	Nihil None	Cases related to workers and employees.
Tidak terdapat pengungkapan segmen operasi.	Nihil None	There are no disclosures on operational segment.
Terdapat ketidaksesuaian antara Laporan Tahunan <i>hardcopy</i> dengan Laporan Tahunan <i>softcopy</i> .	Nihil None	There is inconsistency between Annual Report's hard copy and Annual Report's soft copy.