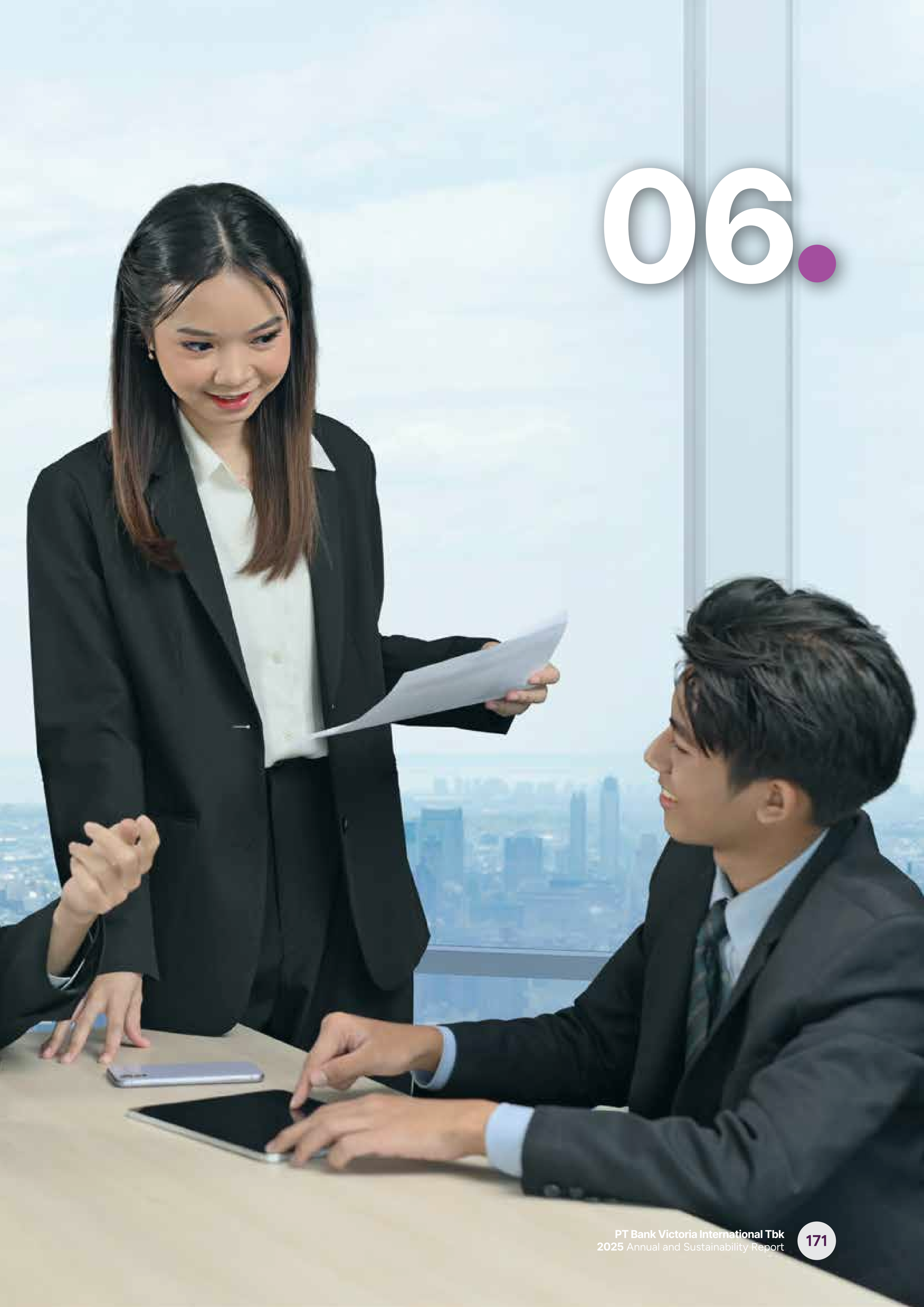
Tata Kelola Perusahaan
Corporate Governance



06.

Dasar dan Prinsip Implementasi GCG

Basis and Principles of GCG Implementation

Tata kelola perusahaan yang baik (*Good Corporate Governance/GCG*) merupakan prinsip pengelolaan perusahaan sesuai peraturan dan etika bisnis, yang diterapkan Bank tidak hanya untuk memenuhi regulasi, tetapi juga meningkatkan kinerja dan daya saing berkelanjutan. Implementasi GCG mengikuti kebijakan, prosedur, dan praktik terbaik industri, guna menjaga kesehatan Bank, memperkuat kepercayaan publik, serta memberi nilai tambah bagi pemangku kepentingan. Bank mengacu pada regulasi Otoritas Jasa Keuangan dan PUGKI 2021 yang berlandaskan 4 (empat) pilar: perilaku beretika, akuntabilitas, transparansi, dan keberlanjutan, yang merupakan pengembangan dari nilai transparansi, akuntabilitas, responsibilitas, independensi, kewajaran, dan kesetaraan.

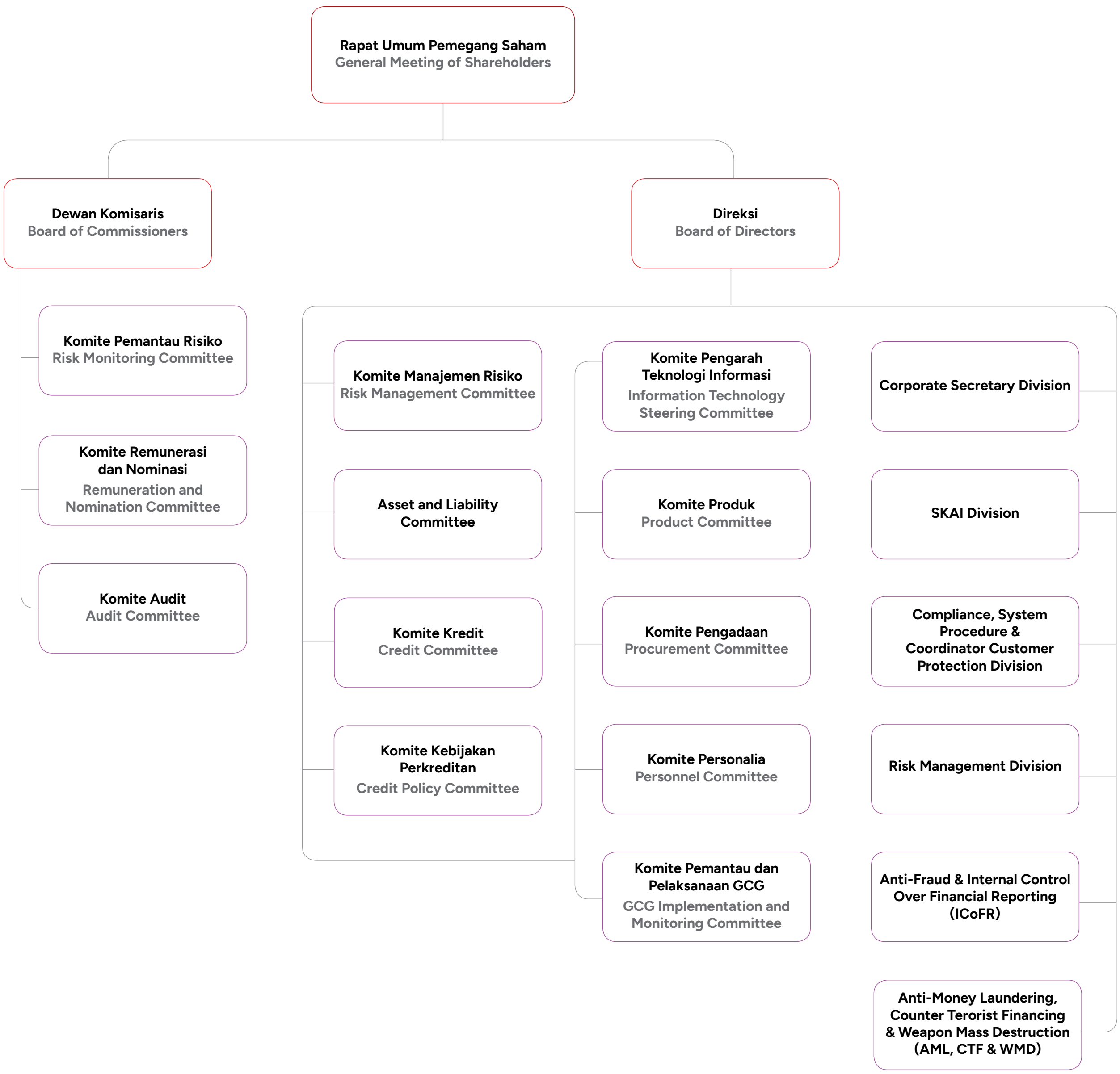
Good Corporate Governance (GCG) is the principles of company management in accordance with regulations and business ethics, carried out by the Bank not only to comply with regulations but also to improve performance and sustainable competitiveness. GCG implementation follows industry policies, procedures, and best practices to maintain the Bank's soundness, strengthen community trust, and provide added value to stakeholders. The Bank adheres to Financial Services Authority regulations and the 2021 General Guidelines for PUGKI, which are based on 4 (four) pillars: ethical behavior, accountability, transparency, and sustainability. These pillars are the development of values of transparency, accountability, responsibility, independence, 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 GCG Bank terdiri dari organ utama, RUPS, Dewan Komisaris, dan Direksi, serta organ pendukung, seperti komite di tingkat Dewan Komisaris dan Direksi, Sekretaris Perusahaan, unit bisnis, dan unit independen. Struktur ini dirancang untuk memperjelas pemisahan tugas, tanggung jawab, mekanisme pengambilan keputusan, dan pelaporan, sesuai peraturan yang berlaku, sekaligus memastikan adanya *check and balances* dalam penerapan GCG.

The Bank's GCG structure consists of main organs, GMS, Board of Commissioners, and Board of Directors, as well as supporting organs, such as committees at Board of Commissioners and Board of Directors levels, Corporate Secretary, business units, and independent units. This structure is designed to clarify the separation of duties, responsibilities, decision-making mechanisms, and reporting, in accordance with applicable regulations, while ensuring check and balances in GCG implementation.



Framework GCG
GCG Framework

Untuk memastikan penerapan GCG yang efektif, Bank Victoria menetapkan *Corporate Governance Framework* yang dirancang sesuai peraturan berlaku dan selaras dengan kondisi operasional, budaya organisasi, serta nilai inti Bank. Kerangka ini mengintegrasikan prinsip tata kelola di seluruh lini bisnis, memperkuat akuntabilitas, transparansi, dan etika dalam setiap pengambilan keputusan. Skema dari *Corporate Governance Framework* Bank Victoria ditunjukkan sebagai berikut:

To ensure effective GCG implementation, Bank Victoria determines Corporate Governance Framework, designed in accordance with applicable regulations and in line with the Bank's operational conditions, organizational culture, and core values. This framework integrates governance principles across all business lines, strengthening accountability, transparency, and ethics in all decision-making. The scheme of Bank Victoria's Corporate Governance Framework is presented as follows:

Penetapan fungsi pengendalian yang efektif.
Establishment of effective management function.

Penetapan strategi dan sasaran Bank.
Establishment of Bank's strategies and targets.

Pemilihan dan pengawasan HC yang efektif.
Selection and supervision of effective HC.

Alokasi Wewenang, Tugas, dan Tanggung Jawab Organ Bank yang Efektif.
Effective Allocation of Authority, Duties, and Responsibilities of the Bank's Organs.

Pemaduan budaya, kegiatan usaha, dan perilaku dengan tujuan menjalankan kegiatan usaha yang aman dan sehat, dengan integritas dan patuh terhadap peraturan perundang-undangan.
Combination of culture, business activities, and behavior with the intention of conducting safe and sound business activities, with integrity and in compliance with the laws and regulations.

Pemenuhan kepentingan Pemegang Saham dan pemangku kepentingan lainnya serta melindungi kepentingan nasabah.
Fulfillment of the Shareholders' and other stakeholders' interests and protection of the customers' interests.

Pengelolaan Bank yang profesional.
Professional management of the Bank.

Peningkatan Kualitas Implementasi GCG
Improvement of GCG Implementation Quality

Bank Victoria menerapkan mekanisme tata kelola yang mengacu pada praktik terbaik industri perbankan, dengan tujuan mewujudkan *Good Corporate Sustainability*. Penerapan ini dilakukan melalui serangkaian langkah strategis berikut:

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

Bank Victoria implements governance mechanisms that adhere to banking industry best practices, with the goal of achieving Good Corporate Sustainability. This implementation is carried out through a series of strategic steps as follows:

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

Penilaian Penerapan GCG

Dalam menjaga kualitas tata kelola, Bank Victoria melaksanakan penilaian mandiri (*self-assessment*) GCG setiap tahun sebagai sarana evaluasi menyeluruh atas kecukupan dan efektivitas penerapan prinsip-prinsip tata kelola di seluruh lini. Penilaian ini mengacu pada Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 dan Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum, praktik terbaik industri perbankan, serta perkembangan regulasi terkini. Evaluasi dilakukan terhadap 3 (tiga) aspek utama, yaitu *governance structure, governance process,* dan *governance outcome* dengan mencakup 16 (enam belas) faktor penilaian, antara lain:

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 intern.
9. Pemberian remunerasi.
10. Penyediaan dana kepada pihak terkait (*related party*) dan penyediaan dana besar (*large esposures*).
11. Integritas pelaporan dan sistem teknologi informasi.
12. Rencana strategis Bank.
13. Aspek Pemegang Saham.
14. Penerapan strategi anti-*fraud*, termasuk anti-penyuapan.

Assessment of GCG Implementation

To maintain the quality of governance, Bank Victoria conducts annual GCG self-assessment as a means to comprehensively evaluate the adequacy and effectiveness of governance principles implementation across all lines. This assessment refers to Financial Services Authority Regulation No. 17 of 2023 and Financial Services Authority Circular No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks, banking industry best practices, and the latest regulatory developments. Evaluation is conducted on 3 (three) main aspects, namely governance structure, governance process, and governance outcome, encompassing 16 (sixteen) assessment factors, including:

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 systems.
9. Provision of remuneration.
10. Provision of funds to related party and large exposures.
11. Integrity of reporting and information technology system.
12. The Bank's strategic plan.
13. Shareholders aspect.
14. Implementation of anti-fraud strategies, including anti-bribery.

15. Penerapan keuangan berkelanjutan, termasuk penerapan tanggung jawab sosial dan lingkungan.

16. Penerapan tata kelola dalam kelompok usaha Bank.

15. Implementation of sustainable finance, including implementation of social and environmental responsibility.

16. Implementation of governance within the Bank's business group.

Berdasarkan kriteria penilaian tersebut, hasil penilaian baik dari sisi *governance structure, governance process*, dan *governance outcome* tahun buku 2025 disajikan sebagai berikut:

Based on these assessment criteria, the assessment results for governance structure, governance process, and governance outcome for the 2025 fiscal year were presented as follows:

Peringkat **Rating**		**Definisi Peringkat** **Rating Definition**
Individu individual	2	Baik Good
Analisis **Analysis**		
Bank telah melakukan penerapan GCG yang secara umum baik, tercermin dari penerapan terhadap 16 (enam belas) aspek yang telah dituangkan dalam analisis. Secara umum beberapa kelemahan yang ada, berkurang signifikan dari tahun 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 16 (sixteen) aspects outlined in the analysis. In general, some of the existing weaknesses significantly decrease compared to the previous year and can be resolved with normal actions by the management of the Bank.		

Hasil skor *self-assessment* GCG Bank Victoria disusun berdasarkan evaluasi terhadap kesesuaian pelaksanaan tata kelola dengan 3 (tiga) aspek utama, yaitu *governance structure, governance process*, dan *governance outcome*. Penilaian ini dilakukan secara menyeluruh untuk setiap kriteria, disertai dengan langkah tindak lanjut yang dijelaskan sebagai berikut:

The results of Bank Victoria's GCG self-assessment score are compiled based on evaluation of the compliance of governance implementation with 3 (three) main aspects, namely governance structure, governance process, and governance outcome. This assessment is conducted comprehensively for each criterion, accompanied by follow-up steps, as explained below:

Kekuatan (*Strength*) Penerapan Tata Kelola Bank **The Strength of the Bank's Governance Implementation**	
Governance Structure	• Bank telah menjalankan struktur tata kelola yang baik sesuai dengan ketentuan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola yang Baik. Kepatuhan ini tercermin dari kesesuaian komposisi anggota Direksi, Dewan Komisaris, serta telah dibentuk komite-komite Bank (Komite di bawah Dewan Komisaris dan Direksi termasuk pembentukan Komite Non-*Mandatory*), efektivitas komite yang telah dibentuk ketersediaan Pedoman dan Tata Tertib (*Charter*), guna memastikan GCG telah diterapkan dalam segala kegiatan Bank. • Pada periode semester II tahun 2025, Dewan Komisaris telah melaksanakan tugas pengawasan dengan baik serta telah memberi saran dan/atau arahan atas kebijakan yang di ambil Direksi terhadap operasional dan bisnis Bank, yang secara umum mengacu pada rencana bisnis yang telah ditetapkan, serta memastikan kepatuhan terhadap seluruh peraturan perundang-undangan yang berlaku dan atas pelaksanaan tugas dan tanggung jawab Dewan Komisaris dipertanggungjawabkan dalam RUPS Tahunan yang telah diselenggarakan pada Juni tahun 2025. • Bank telah menerapkan prinsip tiga (3) lini pertahanan (*three lines of defense*) untuk sistem pengendalian internal. Setiap "lini pertahanan" memiliki serangkaian tanggung jawab khusus untuk manajemen dan pengendalian risiko. • The Bank has implemented good governance structure in accordance with the provisions of Financial Services Authority Regulation No. 17 of 2023 on Good Governance. This compliance is reflected in the appropriate composition of the Board of Directors and Board of Commissioners, as well as the establishment of Bank committees (Committees under Board of Commissioners and Board of Directors, including the establishment of Non-Mandatory Committees), the effectiveness of the established committees, and the availability of Charter to ensure GCG is implemented in all Bank activities. • In the second semester of 2025, the Board of Commissioners performed its supervisory duties effectively and provided advice and/or direction on policies adopted by the Board of Directors regarding the Bank's operations and business, which generally referred to the established business plan. It also ensured compliance with all applicable laws and regulations. The Board of Commissioners' duties and responsibilities implementation was accounted for in the Annual GMS held in June 2025. • The Bank has implemented the principle of three (3) lines of defense for its internal control system. Each "line of defense" has a specific set of responsibilities for risk management and control.

Kekuatan (*Strength*) Penerapan Tata Kelola Bank The Strength of the Bank's Governance Implementation	
Governance Process	• Direksi telah melaksanakan tugas dan tanggung jawabnya sesuai dengan pedoman serta kewenangan yang tercantum dalam Anggaran Dasar. Dalam menjalankan peran, termasuk upaya pencapaian target Rencana Bisnis Bank (RBB), Direksi berpedoman pada peraturan perundang-undangan, Anggaran Dasar, *BoD Charter*, dan prinsip-prinsip tata kelola yang baik yang berlaku. Dengan cara ini, Direksi memastikan kepatuhan terhadap prinsip kehati-hatian, ketentuan Batas Maksimum Pemberian Kredit (BMPK), ketentuan pihak terkait, serta aturan lain yang relevan. • Dewan Komisaris telah melakukan fungsi pengawasan terhadap kinerja Direksi, baik melalui mekanisme rapat maupun berdasar rekomendasi dari komite, serta memberikan saran dan/atau arahan secara tertulis. • Direktur yang membawahi fungsi kepatuhan telah memastikan kepatuhan Bank terhadap ketentuan yang berlaku. Pelaksanaan fungsi kepatuhan, anti-pencucian uang, manajemen risiko, Internal Audit serta anti-*fraud* telah berjalan sesuai dan memenuhi pedoman intern sesuai dengan peraturan perundang-undangan, guna memastikan fungsi Satuan Kerja Manajemen Risiko, Satuan Kerja Kepatuhan, Unit AML CFT WMD, serta Unit Anti-*Fraud* & ICoFR telah menjalankan fungsinya secara independen dan objektif. • Sosialisasi sejumlah peraturan baru, resosialisasi peraturan yang diperlukan serta pemberian *refreshment* bagi *Compliance Champion* sebagai *liasion officer* divisi dan/atau cabang yang antara lain bertugas untuk melakukan sosialisasi peraturan dan kebijakan di divisi dan/atau cabang tempatnya ditugaskan, telah dilakukan pada semester II tahun 2025. Demikian juga penerapan *self-assessment checklist* yang wajib dilakukan oleh *Compliance Champion* di cabang, dalam rangka monitor kepatuhan di cabang pada regulasi dan ketentuan internal yang berlaku dinilai cukup efektif dalam meningkatkan kesadaran dan pemahaman karyawan pada regulasi dan/atau *Standard Operating Procedure* (SOP) yang berlaku. • The Board of Directors has conducted its duties and responsibilities in accordance with the guidelines and authorities stated in the Articles of Association. In performing its role, including the efforts to achieve the Bank's Business Plan (RBB) targets, the Board of Directors is guided by laws and regulations, Articles of Association, BoD Charter, and the applicable good governance principles. In this way, the Board of Directors ensures its compliance with the principle of prudence, provision of Legal Lending Limit (LLL), provision of related parties, and other relevant regulations. • The Board of Commissioners has carried out its supervisory function on the Board of Directors' performance, either through meetings or based on committee recommendations, as well as in providing advice and/or direction in writing. • The Director in charge of compliance function has ensured the Bank's compliance with the applicable regulations. The implementation of compliance, anti-money laundering, risk management, Internal Audit, and anti-fraud functions has been carried out in line with and in accordance with internal guidelines in accordance with laws and regulations. This ensures that the Risk Management Work Unit, Compliance Work Unit, AML CFT WMD Unit, and Anti-Fraud & ICoFR Unit carry out their functions independently and objectively. • Dissemination of several new regulations, re-dissemination of necessary regulations, and provision of refreshment training for Compliance Champions, who serve as division and/or branch liaison officers, whose duties include disseminating regulations and policies in their assigned divisions and/or branches, were implemented in the second semester of 2025. Similarly, the implementation of a mandatory self-assessment checklist by Compliance Champions at branches to monitor branch compliance with applicable regulations and internal provisions was deemed quite effective in increasing employee awareness and understanding of applicable regulations and/or Standard Operating Procedures (SOPs).
Governance Outcome	• Dewan Komisaris telah melakukan tugas pengawasan dan telah memberikan arahan kepada Direksi (baik berdasarkan masukan dari komite maupun berdasarkan hasil pengawasan langsung) antara lain melalui media rapat gabungan Dewan Komisaris dan Direksi yang dilakukan secara berkala paling sedikit 1 (satu) kali dalam 2 (dua) bulan, ataupun pada rapat Komite Kredit untuk kredit dengan jumlah tertentu. Pemantauan dan hasil evaluasi juga diberikan Dewan Komisaris atas pencapaian RBB pada semester II tahun 2025. • Direksi telah menjalankan tugas dan tanggung jawabnya melakukan pengurusan Bank sesuai kewenangan yang diberikan dalam RUPS dan Anggaran Dasar perusahaan secara bertanggung jawab, di mana hal ini dapat dilihat antara lain pada hasil Penilaian sendiri tingkat kesehatan Bank periode Juni 2024 dan periode sebelumnya adalah peringkat 2 (dua) (Surat Otoritas Jasa Keuangan No. SR-207/PB.32/2024 tanggal 26 Oktober 2024 dan Surat Otoritas Jasa Keuangan No. SR-57/PB.321/2023 tanggal 2 Agustus 2023). • Selama semester II tahun 2025, Bank dalam menerapkan GCG, yaitu Bank telah menindaklanjuti regulasi terbaru seperti antara lain: » Menginikan kebijakan dan SOP sesuai dengan perubahan regulasi serta *best practice* sesuai dengan transaksi operasional. » Dalam rangka meningkatkan aspek kepatuhan pada level cabang dan/atau divisi terkait lainnya, Satuan Kerja Kepatuhan telah menunjuk sejumlah *Compliance Champion* di cabang dan divisi. Kegiatan yang dilakukan Satuan Kerja Kepatuhan adalah dengan melakukan sosialisasi setiap semester 1 (satu) kali dan menugaskan *Compliance Champion* di cabang menyampaikan *self-assessment* kepatuhan setiap triwulan. » Pada semester II tahun 2025, Bank telah menyelesaikan seluruh komitmen temuan Otoritas Jasa Keuangan tahun 2024 dan *on progress* menyelesaikan komitmen temuan Otoritas Jasa Keuangan tahun 2025.

Kekuatan (*Strength*) Penerapan Tata Kelola Bank **The Strength of the Bank's Governance Implementation**	
	• The Board of Commissioners has performed its supervisory duties and provided direction to the Board of Directors (based on input from committees and the results of direct supervision), including through joint meetings of the Board of Commissioners and Board of Directors held periodically at least once every 2 (two) months, or at Credit Committee meetings for loans of a certain amount. The Board of Commissioners also provided monitoring and evaluation results regarding RBB achievement in the second semester of 2025. • The Board of Directors has responsibly carried out its duties and responsibilities in managing the Bank in accordance with the authority granted in the GMS and the Company's Articles of Association. This is evident, among others, in the Bank's self-assessment of its sound level for the period of June 2024 and the previous period, which ranked 2 (two) (Financial Services Authority Letter No. SR-207/PB.32/2024 dated 26 October 2024 and Financial Services Authority Letter No. SR-57/PB.321/2023 dated 2 August 2023). • During the second semester of 2025, the Bank implemented GCG by following the latest regulations, including: » Updating policies and SOPs in accordance with regulatory changes and best practices for operational transactions. » To improve compliance at the branch and/or other relevant division levels, the Compliance Unit has appointed several Compliance Champions in branches and divisions. The activities carried out by Compliance Work Unit include conducting dissemination once every semester and assigning Compliance Champions at branches to conduct quarterly compliance self-assessments. » In the second semester of 2025, the Bank completed all commitments from the Financial Services Authority findings in 2024 and was on progress to complete the commitments from the Financial Services Authority findings in 2025.
Kelemahan (*Weakness*) Penerapan Tata Kelola Bank **The Weakness of the Bank's Governance Implementation**	
Governance Structure	Secara keseluruhan struktur tata kelola Bank telah berjalan dengan baik, dengan mendasarkan pada segenap perundangan, regulasi, dan ketentuan internal yang berlaku. Overall, the Bank's governance structure has been operating well, based on all applicable laws, regulations, and internal provisions.
Governance Process	Pada semester II tahun 2025, masih terdapat denda yang dikenakan regulator pada Bank, terkait keterlambatan dan/atau kesalahan penyampaian laporan. Hal ini mencerminkan masih terdapatnya kelemahan proses tata kelola informasi dalam organisasi Bank yang perlu dilakukan tindak lanjut untuk meminimalisir kesalahan yang dapat mengakibatkan timbulnya sanksi teguran ataupun denda dari regulator atas pelanggaran ketentuan tersebut. Ke depannya, Bank akan melakukan pengembangan dan/atau perbaikan pada sistem pelaporan, serta menetapkan penanggung jawab yang jelas, beserta alternatifnya atas setiap laporan. In the second semester of 2025, the Bank still incurred fines imposed by regulators for late and/or incorrect report submissions. This reflects ongoing weaknesses in the Bank's information governance process, which require follow-up to minimize errors that could result in warnings or fines from regulators for violations of these provisions. Moving forward, the Bank will develop and/or improve its reporting system, as well as establish clear responsibilities and alternatives for each report.
Governance Outcome	• Walaupun pada semester II tahun 2025 masih terdapat pengenaan sanksi/denda oleh regulator kepada Bank yang pada umumnya disebabkan oleh keterlambatan penyampaian dan/atau keterlambatan koreksi laporan di luar batas waktu, namun sanksi tersebut terkonsentrasi pada beberapa jenis laporan tertentu, khususnya terkait Laporan Bulanan Umum Terintegrasi (LBUT) (termasuk koreksi) serta sanksi administratif hasil pengawasan/pemeriksaan Otoritas Jasa Keuangan. Dengan mempertimbangkan bahwa kewajiban pelaporan Bank kepada regulator (Otoritas Jasa Keuangan/Bank Indonesia/Pusat Pelaporan dan Analisis Transaksi Keuangan) mencakup berbagai laporan harian, mingguan, dan bulanan, maka temuan keterlambatan/koreksi yang berujung denda tersebut dinilai relatif terbatas secara cakupan. Atas hal ini, Bank telah menjadikan kejadian tersebut sebagai perhatian serius unit kerja terkait dan akan terus memperkuat pengendalian serta monitoring pelaporan guna menjaga kualitas dan ketepatan waktu penyampaian laporan Bank. • Pada semester II tahun 2025, masih terus dilakukan pengkinian atas kebijakan dan/atau prosedur, sehubungan perubahan regulasi yang mendasarinya dan/atau jatuh tempo masa reviu, di mana penginian atas *existing* kebijakan dan/atau prosedur dilakukan secara berkesinambungan dan bertahap sesuai skala prioritas dan rencana kerja yang telah disusun, sehubungan beberapa keterbatasan pada Bank. • Although regulators continued to impose sanctions/fines on the Bank in the second semester of 2025, generally due to late submission and/or late correction of reports beyond the deadline, these sanctions were concentrated on certain types of reports, particularly those related to the Integrated Monthly General Report (LBUT) (including corrections) and administrative sanctions resulting from supervision/inspections by the Financial Services Authority. Considering that the Bank's reporting obligations to the regulator (Financial Services Authority/Bank Indonesia/Financial Transaction Reports and Analysis Center) encompass a variety of daily, weekly, and monthly reports, the findings of late corrections resulting in fines are considered relatively limited in scope. In response, the Bank has taken this incident seriously and will continue to strengthen reporting controls and monitoring to maintain the quality and timeliness of the Bank's report submissions. • In the second semester of 2025, updates to policies and/or procedures were continued to be made due to underlying regulatory changes and/or review due dates. Updates to existing policies and/or procedures are carried out continuously and in stages according to the established priorities and work plan, in light of several limitations within the Bank.

Rekomendasi dan Tindak Lanjut Penilaian GCG

Penilaian penerapan GCG Bank tahun 2025 menghasilkan sejumlah rekomendasi dari regulator yang perlu ditindaklanjuti oleh Bank untuk memastikan perbaikan berkelanjutan. Rincian rekomendasi tersebut sebagai berikut:

Recommendation and Follow-Up on GCG Assessment

The assessment of the Bank's GCG implementation in 2025 resulted in several recommendations from regulators to be followed up by the Bank to ensure continuous improvement. Details of these recommendations are as follows:

Rekomendasi Recommendation	Rencana Tindak Lanjut Follow-Up Plan	Tindakan Korektif Corrective Action
Hasil pemeriksaan Otoritas Jasa Keuangan 2025 wajib ditindaklanjuti, terutama untuk temuan dengan *target date* yang telah ditetapkan, sesuai dengan komitmen Bank kepada Otoritas Jasa Keuangan.	Bank berkomitmen meningkatkan kualitas proses manajemen risiko kredit dan risiko operasional, termasuk perbaikan pada penerapan tata kelola dan program Anti-Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (APU-PPT dan PPPSPM).	Bank telah melakukan perbaikan pada semua aspek yang menjadi *concern* dari regulator, seperti penginian kebijakan dan prosedur perkreditan, operasional, serta APU-PPT dan PPPSPM.
Results of the 2025 Financial Services Authority audit must be followed up, particularly for findings with predetermined target date, in line with the Bank's commitment to the Financial Services Authority.	The Bank is committed to improving the quality of its credit and operational risk management processes, including improvements to the governance implementation and programs for Anti-Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction (AML-CTF and CPF).	The Bank has made improvements in all aspects of regulatory concern, such as updating credit and operational policies and procedures, as well as AML-CTF and CPF.

Informasi laporan pelaksanaan GCG Bank juga dapat di akses pada situs web Bank bagian Laporan Tata Kelola Perusahaan (*Good Corporate Governance*).

Information on the Bank's GCG implementation report is also accessible on the Bank's website under Good Corporate Governance Report section.

Rapat Umum Pemegang Saham
General Meeting of Shareholders

Rapat Umum Pemegang Saham (RUPS) merupakan organ tertinggi dalam tata kelola Bank, di mana Pemegang Saham menjalankan haknya untuk menentukan kebijakan strategis, termasuk pengangkatan atau pemberhentian Dewan Komisaris dan Direksi, persetujuan Laporan Keuangan, distribusi dividen, serta perubahan Anggaran Dasar. Penyelenggaraan RUPS mengacu pada peraturan perundang-undangan yang berlaku dan terdiri atas RUPS Tahunan, yang wajib dilaksanakan paling lambat 6 (enam) bulan setelah tahun buku berakhir, serta RUPS Luar Biasa yang dapat diselenggarakan sesuai kebutuhan.

The General Meeting of Shareholders (GMS) is the highest organ in the Bank's governance, where Shareholders exercise their rights to determine strategic policies, including appointment or dismissal of the Board of Commissioners and Board of Directors, approval of the Financial Statements, distribution of dividends, and amendments to the Articles of Association. GMS implementation refers to the applicable laws and regulations and consists of Annual GMS, required to be held no later than 6 (six) months after the end of the fiscal year, and Extraordinary GMS, may be held as necessary.

Peran Pemegang Saham dalam Menjaga Kesehatan dan Keberlangsungan Usaha Bank

Sesuai dengan ketentuan Peraturan Otoritas Jasa Keuangan mengenai penerapan tata kelola bank umum, Pemegang Saham berperan dalam mendukung penerapan GCG serta menjaga keberlanjutan usaha Bank melalui pelaksanaan hak dan kewajibannya secara bertanggung jawab. Pelaksanaan peran tersebut dilakukan dengan tetap memperhatikan prinsip kehati-hatian, kepatuhan terhadap peraturan perundang-undangan, serta ketentuan Anggaran Dasar Bank.

Pemegang Saham menjalankan kewenangannya melalui RUPS sebagai organ Bank yang memiliki wewenang yang tidak diberikan kepada Dewan Komisaris maupun Direksi. Melalui RUPS, Pemegang Saham menetapkan keputusan strategis sesuai dengan kewenangannya, termasuk pengesahan Laporan Tahunan, penetapan penggunaan laba, serta pengangkatan dan pemberhentian anggota Dewan Komisaris dan Direksi, dengan memperhatikan integritas, kompetensi, dan rekam jejak yang sesuai dengan ketentuan regulator.

Dalam kerangka tata kelola, Pemegang Saham memberikan dukungan terhadap pelaksanaan fungsi pengawasan oleh Dewan Komisaris dan fungsi pengurusan oleh Direksi, tanpa melakukan campur tangan terhadap kegiatan operasional Bank. Pemisahan peran dan kewenangan antar organ Bank tersebut dilaksanakan untuk memastikan independensi, akuntabilitas, serta efektivitas pengelolaan Bank sesuai dengan ketentuan Peraturan Otoritas Jasa Keuangan tentang Tata Kelola Bank Umum.

Shareholders' Role in Maintaining Soundness and Sustainability of Bank Businesses

In accordance with Financial Services Authority Regulation on good corporate governance implementation in commercial banks, Shareholders play a role in supporting GCG implementation and maintaining the Bank's business sustainability through responsible exercise of their rights and obligations. This role is carried out while adhering to prudent principles, compliance with laws and regulations, and provisions of the Bank's Articles of Association.

Shareholders exercise their authority through the GMS as the Bank's organ with authority not granted to the Board of Commissioners or Board of Directors. Through the GMS, Shareholders make strategic decisions within their authority, including Annual Report ratification, determination of appropriation of income, as well as appointment and dismissal of members of the Board of Commissioners and Board of Directors, with due regard to their integrity, competence, and track record in accordance with regulatory requirements.

Within the governance framework, Shareholders provide support for the implementation of the supervisory function by the Board of Commissioners and management function by the Board of Directors, without interfering in the Bank's operational activities. This separation of roles and authorities between the Bank's organs is implemented to ensure the independence, accountability, and effectiveness of the Bank's management in accordance with the Financial Services Authority Regulation on Good Corporate Governance in Commercial Banks.

Pemegang Saham juga mendukung kecukupan permodalan Bank sesuai dengan profil risiko dan ketentuan permodalan yang berlaku, sebagai bagian dari upaya menjaga ketahanan Bank dalam menghadapi risiko dan dinamika lingkungan usaha. Dukungan terhadap penguatan struktur permodalan tersebut merupakan salah satu wujud komitmen Pemegang Saham dalam menjaga kelangsungan usaha Bank secara berkelanjutan.

Shareholders also support the Bank's capital adequacy in accordance with risk profile and applicable capital requirements, as an effort to maintain the Bank's resilience in facing the risks and dynamics of business environment. The support for strengthening capital structure demonstrates Shareholders' commitment to maintaining the Bank's business continuity.

Dengan demikian, peran Pemegang Saham dilaksanakan secara selaras dengan prinsip transparansi, akuntabilitas, responsibilitas, independensi, dan kewajaran, guna memastikan penerapan GCG serta mendukung pertumbuhan Bank yang sehat dan berkelanjutan.

Thus, the Shareholders' role is carried out in accordance with the principles of transparency, accountability, responsibility, independence, and fairness, to ensure GCG implementation and support the Bank's soundness and sustainable growth.

Informasi Mengenai Keputusan RUPS Tahun 2025

Pada tahun 2025, Bank melaksanakan 1 (satu) kali RUPS, yaitu RUPS Tahunan yang diselenggarakan pada 20 Juni 2025 pada pukul 10.37 WIB - selesai, bertempat di Graha BIP, Function Hall Lt. 11, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930. Kehadiran Dewan Komisaris, Direksi, Pemegang Saham, dan pihak independen yang ditunjuk dalam RUPS Tahunan Bank di tahun 2025 ditunjukkan sebagai berikut:

Information on the 2025 GMS Resolutions

In 2025, the Bank held 1 (one) GMS, namely Annual GMS, held on 20 June 2025, from 10.37 WIB until finished, at Graha BIP, Function Hall, Lt. 11, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930. The attendance of the Board of Commissioners, Board of Directors, Shareholders, and independent parties appointed at the Bank's 2025 Annual GMS is as follows:

Dewan Komisaris **Board of Commissioners**	Komisaris Utama Independen Komisaris Independen Independent President Commissioner Independent Commissioner	: Zaenal Abidin Ph.D : Gunawan Tenggarahardja : Zaenal Abidin Ph.D : Gunawan Tenggarahardja
Direksi **Board of Directors**	Direktur Utama Wakil Direktur Utama Direktur Direktur Direktur Kepatuhan dan Manajemen Risiko President Director Deputy President Director Director Director Director of Compliance and Risk Management	: Achmad Friscantono : Rusli : Lembing : Debora Wahjutirto Tanoyo : Tamunan : Achmad Friscantono : Rusli : Lembing : Debora Wahjutirto Tanoyo : Tamunan
Pemegang Saham **Shareholders**	RUPS dihadiri oleh Pemegang Saham yang mewakili 12.746.509.137 saham atau 80,43% dari seluruh saham dengan hak suara yang sah yang telah dikeluarkan oleh Bank. The GMS was attended by Shareholders representing 12,746,509,137 shares or 80.43% of all shares with valid voting rights issued by the Bank.	
Pihak Independen **Independent Party**	Bank telah menunjuk pihak independen, yaitu Notaris Fathiah Helmi, SH, Biro Administrasi Efek, yaitu PT Adimitra Jasa Korpora, dan Kantor Akuntan Publik Purwanto Susanti & 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 Purwanto Susanti & Surja to count and/or validate votes.	

Hasil Keputusan RUPS Tahunan 20 Juni 2025
Resolutions of Annual GMS 20 June 2025

Keputusan **Resolutions**	**Realisasi** **Realization**	**Pengambilan Suara** **Voting**
Menyetujui Laporan Tahunan Perseroan untuk Tahun Buku yang berakhir pada tanggal 31 Desember 2024, termasuk Laporan Direksi dan Laporan Tugas Pengawasan Dewan Komisaris Perseroan, serta mengesahkan Laporan Keuangan Perseroan untuk Tahun Buku yang berakhir pada tanggal 31 Desember 2024 yang telah diaudit oleh Kantor Akuntan Publik Purwanto Susanti & Surja dengan *partner* penanggung jawab Ibu Yovita, dengan opini audit wajar dalam semua hal yang material sesuai dengan Laporan Auditor Independen No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 tanggal 6 Maret 2025. Dengan demikian, membebaskan Direksi dan Dewan Komisaris Perseroan dari tanggung jawab dan segala tanggungan (*acquit et de charge*) atas tindakan pengurusan dan pengawasan yang Direksi dan Dewan Komisaris jalankan selama tahun buku 2024, sepanjang tindakan-tindakan tersebut tercantum dalam neraca dan laporan laba rugi Perseroan tahun buku 2024.	Telah direalisasikan sepenuhnya.	Setuju : 12.745.608.037 saham Tidak Setuju : 901.100 saham Abstain : -
Approved the Company's Annual Report for the Fiscal Year ended 31 December 2024, including the Board of Directors' Report and Board of Commissioners' Supervisory Report of the Company, and validated the Company's Financial Statements for the Fiscal Year ended 31 December 2024, audited by Public Accounting Firm Purwanto Susanti & Surja with the partner in charge Mrs. Yovita, with audit opinion of fair in all material respects according to the Independent Auditor Report No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 dated 6 March 2025. Thereby, releasing the Board of Directors and Board of Commissioners of the Company from all responsibilities and liabilities (*acquit et de charge*) for the management and supervision actions carried out by the Board of Commissioners and Board of Directors during the 2024 fiscal year, provided that these actions are included in the balance sheet and profit lost statement of the Company for the 2024 fiscal year.	Fully realized.	Agree : 12,745,608,037 shares Disagree : 901,100 shares Abstain : -
Menyetujui penggunaan laba bersih Perseroan sebesar Rp117.859.236.419,- untuk dipergunakan sebagai berikut: 1. Sebesar Rp25.000.000.000,- dibukukan sebagai pembentukan dana cadangan umum, guna memenuhi ketentuan Pasal 70 Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas dan Pasal 25 Anggaran Dasar Perseroan. 2. Sisanya sebesar Rp92.859.236.419,- akan dibukukan sebagai laba ditahan. Dengan demikian, Perseroan tidak memberikan dividen untuk tahun buku 2024.	Telah direalisasikan sepenuhnya.	Setuju : 12.745.608.037 saham Tidak Setuju : 901.100 saham Abstain : -
Approved the appropriation of the Company's net income of Rp117,859,236,419 for the following purposes: 1. A total of Rp25,000,000,000 was recorded as general reserve funds to comply with Article 70 of Law No. 40 of 2007 on Limited Liability Companies and Article 25 of the Company's Articles of Association. 2. The remaining Rp92,859,236,419 was recorded as retained earnings. Thus, the Company did not pay dividends for the 2024 fiscal year.	Fully realized.	Agree : 12,745,608,037 shares Disagree : 901,100 shares Abstain : -
1. Memberi kuasa dan wewenang kepada PT Victoria Investama Tbk, selaku pemegang 44,23% saham dalam Perseroan untuk menetapkan besarnya honorarium dan tantiem/bonus/tunjangan lain bagi anggota Dewan Komisaris untuk tahun 2025. 2. Menyetujui pelimpahan wewenang kepada Dewan Komisaris Perseroan untuk menetapkan besarnya gaji, tantiem/bonus/tunjangan lain bagi anggota Direksi untuk tahun 2025, serta memberikan pelimpahan wewenang kepada Direksi untuk menetapkan bonus kepada karyawan untuk tahun 2025.	Telah direalisasikan sepenuhnya.	Setuju : 12.745.606.237 saham Tidak Setuju : 1.800 saham Abstain : 901.100 saham
1. Approved to grant power and authority to PT Victoria Investama Tbk, as the shareholder of 44.23% shares of the Company to determine the amount of honorarium and tantiem/bonus/other allowances for members of the Board of Commissioners for 2025. 2. Approved the transfer of authority to the Board of Commissioners to determine the amount of salary, tantiem/bonus/other allowances for members of the Board of Directors for 2025, and approved to grant transfer of authority to the Board of Directors to determine employee bonus for 2025.	Fully realized.	Agree : 12,745,606,237 shares Disagree : 1,800 shares Abstain : 901,100 shares

Keputusan Resolutions	Realisasi Realization	Pengambilan Suara Voting
Menyetujui memberikan wewenang kepada Dewan Komisaris Perseroan untuk menunjuk akuntan publik independen dari kantor akuntan publik independen yang terdaftar di Otoritas Jasa Keuangan, sehubungan Dewan Komisaris masih dalam proses penentuan akuntan publik yang akan mengaudit buku Perseroan dengan kriteria akuntan publik dan kantor akuntan publik wajib terdaftar pada Otoritas Jasa Keuangan, kantor akuntan publik merupakan salah satu anggota dari *Big Four*, serta akuntan publik dan kantor akuntan publik merupakan pihak yang independen dan profesional untuk mengaudit Laporan Keuangan Perseroan untuk tahun buku 2025 dengan memperhatikan rekomendasi dari Komite Audit. Selain itu, dilimpahkan kewenangan kepada Dewan Komisaris untuk menetapkan jumlah honorarium dan persyaratan lain sehubungan dengan penunjukan kantor akuntan publik dimaksud.	Telah direalisasikan sepenuhnya.	Setuju : 12.745.608.037 saham Tidak Setuju : 901.100 saham Abstain : -
Approved to grant authority to the Board of Commissioners to appoint an independent public accountant from the independent public accounting firm registered with the Financial Services Authority, in relation to the ongoing process of determining a public accountant who will audit the Company's books under the criteria of public accountant and public accounting firm must be registered with the Financial Services Authority, public accounting firm must be a member of the Big Four, public accountant and public accounting firm are independent and professional parties to audit the Company's Financial Statements for the 2025 fiscal year with due observance of recommendations from the Audit Committee. Furthermore, granted authority to Board of Commissioners to determine the honorarium amount and other requirements in relation to appointment of such public accounting firm.	Fully realized.	Agree : 12,745,608,037 shares Disagree : 901,100 shares Abstain : -
1. Menyutujui perubahan pengurus Perseroan, yaitu sebagai berikut: Direksi Perseroan terdiri dari: Direktur Utama : Bapak Achmad Friscantono Wakil Direktur Utama : Bapak Rusli Direktur : Bapak Lembing Direktur : Ibu Debora Wahjutirto Tanoyo Direktur Kepatuhan dan Manajemen Risiko : Bapak Tamunan Dewan Komisaris Perseroan terdiri dari: Komisaris Utama Independen : Bapak Zaenal Abidin Ph.D Komisaris Independen : Bapak Gunawan Tenggarahardja Komisaris : Bapak Sia Leng Ho 2. Memberikan kuasa kepada Direksi Perseroan dengan hak subtitusi untuk menyatakan keputusan rapat sehubungan dengan pengangkatan kembali seluruh Anggota Direksi dan Dewan Komisaris Perseroan dalam akta tersendiri dihadapan Notaris dan untuk melakukan pemberitahuan kepada Menteri Hukum Republik Indonesia sehubungan dengan pengangkatan kembali seluruh Anggota Direksi dan Dewan Komisaris Perseroan tersebut di atas, serta melakukan segala tindakan yang diperlukan dan diisyaratkan oleh peraturan perundang-undangan yang berlaku.	Telah direalisasikan sepenuhnya.	Setuju : 12.745.608.037 saham Tidak Setuju : 901.100 saham Abstain : -
1. Approved the changes to the Company's management as follows: The Company's Board of Directors consists of: President Director : Mr. Achmad Friscantono Deputy President Director : Mr. Rusli Director : Mr. Lembing Director : Mrs. Debora Wahjutirto Tanoyo Director of Compliance and Risk Management : Mr. Tamunan The Company's Board of Commissioners consists of: Independent President Commissioner : Mr. Zaenal Abidin Ph.D Independent Commissioner : Mr. Gunawan Tenggarahardja Commissioner : Mr. Sia Leng Ho 2. Granted power to the Board of Directors with substitution right to state meeting resolutions regarding the reappointment of all members of the Board of Directors and Board of Commissioners in a separate deed before a Notary and to notify the Minister of Law of the Republic of Indonesia regarding the reappointment of all members of the Board of Directors and Board of Commissioners, and to take all actions necessary and required by applicable laws and regulations.	Fully realized.	Agree : 12,745,608,037 shares Disagree : 901,100 shares Abstain : -

Keputusan Resolutions	Realisasi Realization	Pengambilan Suara Voting
Sedangkan untuk mata acara keenam, bersifat laporan oleh karenanya tidak dilakukan pengambilan keputusan. Tidak dimintakan persetujuan rapat, hanya bersifat laporan atas realisasi penggunaan dana hasil Penawaran Umum Berkelanjutan Obligasi III Tahap II 2024 dan Penawaran Umum Berkelanjutan Obligasi Subordinasi III Tahap I Tahun 2024 serta hasil *Exercise* Waran Seri VII.	-	-
Meanwhile, the sixth agenda item was a report and therefore no resolution was adopted. No meeting approval was requested, as this was only a report on the realization of the use of proceeds from Public Offering of Continuing Bonds III Phase II Year 2024, Public Offering of Continuous Subordinated Bonds III Phase I Year 2024, and the results of Series VII Warrant Exercise.	-	-
Menyetujui Rencana Pemulihan dan Rencana Resolusi (*Recovery Plan & Resolution Plan*) sesuai ketentuan sebagaimana yang dilampirkan dalam Berita Acara Rapat.	Telah direalisasikan sepenuhnya.	Setuju : 12.745.606.237 saham Tidak Setuju : 902.900 saham Abstain : -
Approved the Recovery Plan and Resolution Plan in accordance with the provisions attached to the Minutes of Meeting.	Fully realized.	Agree : 12,745,606,237 shares Disagree : 902,900 shares Abstain : -

Informasi dan Realisasi Mengenai Keputusan RUPS Tahunan 2024

Pada tahun 2024, Bank menyelenggarakan 1 (satu) kali RUPS Tahunan pada tanggal 14 Juni 2024, bertempat di Graha BIP, Function Hall Lt. 11, Jl. Gatot Subroto Kav. 23, Jakarta Selatan. Bank tidak menyelenggarakan RUPS Luar Biasa sepanjang tahun 2024. Proses pengambilan keputusan dalam RUPS dilakukan melalui musyawarah untuk mufakat, dan apabila tidak tercapai, dilanjutkan dengan pemungutan suara. Untuk menjaga independensi, perhitungan suara dilakukan oleh pihak independen, yaitu Biro Administrasi Efek dan Notaris. Keputusan RUPS Tahunan 2024 beserta realisasi pelaksanaannya disajikan sebagai berikut:

Information and Realization of the 2024 Annual GMS Resolutions

In 2024, the Bank held 1 (one) Annual GMS on 14 June 2024 at Graha BIP, Function Hall, Lt. 11, Jl. Gatot Subroto Kav. 23, Jakarta Selatan.The Bank did not hold any Extraordinary GMS throughout 2024. The process of adopting resolutions at the GMS is conducted through deliberation to reach consensus, and in the event consensus is not reached, voting is conducted. To maintain independence, vote is counted by independent parties, namely Share Registrar Bureau and Notary. The 2024 Annual GMS resolutions and their realization are presented as follows:

Keputusan Resolutions	Realisasi Realization
Menyetujui Laporan Tahunan Perseroan termasuk Laporan Direksi, pengesahan Laporan Keuangan Tahunan, serta Laporan Tugas Pengawasan Dewan Komisaris pada tanggal 31 Desember 2023.	Telah direalisasikan sepenuhnya.
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 2023.	Fully realized.
Menyetujui penetapan penggunaan laba bersih Bank untuk tahun buku yang berakhir pada tanggal 31 Desember 2023.	Telah direalisasikan sepenuhnya.
Approved the determination of the use of the Bank's net income for the fiscal year ending 31 December 2023.	Fully realized.
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.	Telah direalisasikan sepenuhnya.
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.	Fully realized.
Menyetujui menunjuk akuntan publik untuk mengaudit Laporan Keuangan Bank untuk tahun buku 2024 dan memberikan kuasa kepada Dewan Komisaris untuk menetapkan honorarium akuntan publik tersebut serta persyaratan lain penunjukannya.	Telah direalisasikan sepenuhnya.
Approved to appoint a public accountant to audit the Bank's Financial Statements for the 2024 fiscal year and granted authorities to the Board of Commissioners to determine the honorarium for public accountant and other requirements for the appointment.	Fully realized.

Keputusan Resolutions	Realisasi Realization
Menyetujui pembatalan perubahan pengurus yang telah diputuskan pada RUPS Tahunan Perseroan tanggal 26 Mei 2023. Approved to cancel the changes to the management resolved at the Company's Annual GMS on 26 May 2023.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui Laporan Realisasi Penggunaan Dana Hasil *Exercise* Waran Seri VII. Approved the Report on the Realization of the Use of Proceeds from Exercise of Series VII Warrants.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui perubahan Anggaran Dasar Perseroan di antaranya dalam rangka penyesuaian atas diterbitkannya Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023. Approved the amendment to the Company's Articles of Association, including in order to comply with the issuance of Financial Services Authority Regulation No. 17 of 2023.	Telah direalisasikan sepenuhnya. Fully realized.

Dewan Komisaris
Board of Commissioners

Dewan Komisaris memegang peran penting dalam mengawasi kebijakan manajemen dan keseluruhan arah yang diambil oleh Direksi terkait dengan Bank dan kegiatan bisnisnya. Dewan Komisaris dipercayakan untuk memberikan nasihat strategis kepada Direksi serta memantau pelaksanaan rencana jangka panjang, rencana kerja, dan anggaran Bank, dengan mematuhi ketentuan yang tercantum dalam Anggaran Dasar, keputusan RUPS, serta hukum dan peraturan yang berlaku.

The Board of Commissioners plays a crucial role in supervising management policies and overall direction taken by the Board of Directors in relation to the Bank and its business activities. The Board of Commissioners is entrusted with providing strategic advice to the Board of Directors and overseeing the implementation of the Bank's long-term plan, work plan, and budget, in compliance with the provisions stated in the Articles of Association, GMS resolutions, and applicable laws and regulations.

Pedoman Dewan Komisaris

Dalam melaksanakan tugasnya, Dewan Komisaris memiliki pedoman dan tata tertib kerja yang dikenal sebagai *Board of Commissioners Charter* (*BOC Charter*), yang telah diperbarui dan disahkan melalui Keputusan Dewan Komisaris No. 001/SK-KOM/12/23 tanggal 6 Desember 2023.

Board of Commissioners Charter

In performing its duties, the Board of Commissioners has charter and work guidelines known as Board of Commissioners Charter (BOC Charter), updated and ratified through 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

Untuk meningkatkan efektivitas pelaksanaan tugas, Dewan Komisaris menetapkan pembagian peran khusus bagi setiap anggota tanpa mengurangi hak, kewajiban, dan kewenangannya. Ruang lingkup tugas dan tanggung jawab tersebut ditetapkan melalui Keputusan Dewan Komisaris No. 001/SK-KOM/08/25 tanggal 6 Agustus 2025 tentang Pembagian Tugas dan Wewenang Anggota *Board of Commisioners*. Adapun pembagian tugas tersebut sebagai berikut:

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

To improve the effectiveness of duty implementation, the Board of Commissioners determines a specific division of roles for each member without diminishing rights, obligations, and authorities. The scope of these duties and responsibilities is stipulated in the Board of Commissioners' Decision No. 001/SK-KOM/08/25 dated 6 August 2025 on the Division of Duties and Authorities of Members of the Board of Commissioners. The division of duties is as follows:

<table>
<tr><th>Nama dan Jabatan
Name and Position</th><th colspan="2">Tugas dan Tanggung Jawab
Duties and Responsibilities</th></tr>
<tr><td>Zaenal Abidin Ph.D
Komisaris Utama Independen
Independent President Commissioner</td><td>• Melakukan koordinasi dan memberikan pengarahan kepada anggota Dewan Komisaris.
• Mengoordinasikan pengawasan yang dilakukan oleh anggota Dewan Komisaris sesuai dengan bidangnya masing-masing.
• Menyelenggarakan dan memimpin:
› Rapat internal Dewan Komisaris.
› Rapat gabungan Dewan Komisaris dan Direksi guna membahas dan mengevaluasi perkembangan laporan kinerja Direksi.
• Melakukan pengawasan kegiatan pada bidang-bidang:
› Good Corporate Governance.
› Compliance, System Procedure & Coordinator Customer Protection.
› Risk Management.
› SKAI & ICOFR.
› Anti-Fraud.
› Anti-Money Laundering, Counter Terrorist Financing & Weapon Mess Destruction.
• Melakukan pengawasan kegiatan bidang Internal Audit.
• Memberikan tugas lain kepada anggota Dewan Komisaris.
• Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya.
• Mengambil alih tugas Komisaris lainnya apabila yang bersangkutan berhalangan.
• Memimpin rapat gabungan antara Direksi dan Dewan Komisaris.</td><td>• Coordinating and providing direction to the Board of Commissioners' members.
• Coordinating the supervision carried out by the Board of Commissioners' members according to their respective fields.
• Organizing and leading:
› Board of Commissioners internal meeting.
› Joint meetings of the Board of Commissioners and Board of Directors to discuss and evaluate the progress of the Board of Directors' performance reports.
• Supervising activities in the following areas:
› Good Corporate Governance.
› Compliance, System Procedure & Coordinator Customer Protection.
› Risk Management.
› SKAI & ICOFR.
› Anti-Fraud.
› Anti-Money Laundering, Counter Terrorist Financing & Weapon Mess Destruction.
• Supervising activities in Internal Audit areas.
• Giving other duties to the Board of Commissioners' members.
• Creating a draft of memorandum to the Board of Directors relating to the field supervision and development.
• Taking over the duties of other Commissioners in the event the person concerned is absent.
• Leading joint meetings between the Board of Directors and Board of Commissioners.</td></tr>
<tr><td>Gunawan Tenggarahardja
Komisaris Independen
Independent Commissioner</td><td>• Melakukan pengawasan kegiatan bidang-bidang:
› Information Technology.
› Operations.
› Human Capital Management & General Affair.
› Corporate Legal.
› Credit Legal.
› Change Management Office.
› Marketing Communication, Brand & Product Division.
• Membahas permasalahan-permasalahan bidang yang berada di bawah pengawasannya.
• Membantu mempersiapkan penyusunan laporan bagi Otoritas Jasa Keuangan pada setiap akhir semester, khususnya mengenai bidang-bidang yang berada di bawah pengawasannya.
• Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya.
• Mewakili tugas Komisaris Utama dan Komisaris lainnya, apabila yang bersangkutan berhalangan.</td><td>• Supervising activities in the following areas:
› Information Technology.
› Operations.
› Human Capital Management & General Affair.
› Corporate Legal.
› Credit Legal.
› Change Management Office.
› Marketing Communication, Brand & Product Division.
• Discussing issues in the areas under their supervision.
• Assisting the preparation of reports for the Financial Services Authority at the end of each semester, particularly regarding the fields under their supervision.
• Creating a draft of memorandum to the Board of Directors relating to the field supervision and development.
• Representing the duties of the President Commissioner and other Commissioners, in the event the person concerned cannot attend the meeting.</td></tr>
</table>

Nama dan Jabatan Name and Position	Tugas dan Tanggung Jawab Duties and Responsibilities	
Sia Leng Ho Komisaris Commissioner	• Melakukan pengawasan kegiatan bidang-bidang: › *Commercial Banking.* › *SME & Consumer Banking.* › *Branch Banking Network.* › *Finance & Accounting.* › *Loan & Trade Operations.* › *Treasury.* › *International Banking.* › *Credit Monitoring & Collection.* › *Credit Risk Review.* › *Special Asset Management.* • Membahas permasalahan-permasalahan bidang yang berada di bawah pengawasannya. • Membantu mempersiapkan penyusunan laporan bagi Otoritas Jasa Keuangan pada setiap akhir semester, khususnya mengenai bidang-bidang yang berada di bawah pengawasannya. • Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya. • Mewakili tugas Komisaris Utama dan Komisaris lainnya, apabila yang bersangkutan berhalangan.	• Supervising activities in the following areas: › Commercial Banking. › SME & Consumer Banking. › Branch Banking Network. › Finance & Accounting. › Loan & Trade Operations. › Treasury. › International Banking. › Credit Monitoring & Collection. › Credit Risk Review. › Special Asset Management. • Discussing issues in the areas under their supervision. • Assisting the preparation of reports for the Financial Services Authority at the end of each semester, particularly regarding the fields under their supervision. • Creating a draft of memorandum to the Board of Directors relating to the field supervision and development. • Representing the duties of the President Commissioner and other Commissioners, in the event the person concerned cannot attend the meeting.

Wewenang Dewan Komisaris

Dewan Komisaris memiliki wewenang tertentu dalam melaksanakan fungsi pengawasan serta tanggung jawabnya, yang diuraikan sebagai berikut:

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 (tiga puluh) 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.
5. Menyetujui atau menolak secara tertulis tindakan-tindakan yang dilakukan Direksi, seperti yang tercantum dalam *BOC Charter*.

Authority of the Board of Commissioners

The Board of Commissioners has specific authority in performing its supervisory functions and responsibilities, outlined as follows:

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 (thirty) 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.
5. Approving or rejecting in writing the actions of the Board of Directors as stated in the BOC Charter.

Jumlah, Komposisi, dan Independensi Dewan Komisaris

Jumlah dan Komposisi

Dewan Komisaris Bank terdiri dari sekurang-kurangnya 3 (tiga) orang anggota, termasuk Komisaris Independen. Jumlah anggota Dewan Komisaris paling banyak sama dengan jumlah anggota Direksi. Masa jabatan ditetapkan melalui keputusan RUPS untuk periode 3 (tiga) tahun, dengan memperhatikan ketentuan peraturan perundang-undangan dan Anggaran Dasar.

Pada tahun 2025, komposisi Dewan Komisaris Bank yang diangkat berdasarkan Keputusan RUPS Tahunan tanggal 20 Juni 2025 untuk masa jabatan 2025-2028 sebagai berikut:

Komisaris Utama Independen	: Zaenal Abidin Ph.D
Komisaris Independen	: Gunawan Tenggarahardja
Komisaris	: Sia Leng Ho

Independensi

Dewan Komisaris senantiasa menjunjung tinggi prinsip independensi dalam menjalankan tugas dan tanggung jawabnya. Hal ini dilakukan untuk memastikan setiap keputusan bebas dari benturan kepentingan serta melindungi kepentingan Bank dan seluruh pemangku kepentingan.

Number, Composition, and Independence of the Board of Commissioners

Number and Composition

The Bank's Board of Commissioners shall consist of at least 3 (three) members, including Independent Commissioner. The number of members of the Board of Commissioners shall be at most the same as the number of members of the Board of Directors. The term of office shall be determined by GMS resolution for a period of 3 (three) years, by considering the laws and regulations and Articles of Association.

In 2025, the composition of the Bank's Board of Commissioners, appointed based on the Resolution of Annual GMS dated 20 June 2025, for the 2025-2028 term of office, is as follows:

Independent President Commissioner	: Zaenal Abidin Ph.D
Independent Commissioner	: Gunawan Tenggarahardja
Commissioner	: Sia Leng Ho

Independence

The Board of Commissioners always upholds the principle of independence in performing its duties and responsibilities. This is carried out to ensure that every decision is free from any conflicts of interest and to protect the interests of the Bank and all stakeholders.

Penilaian Kemampuan dan Kepatutan Dewan Komisaris

Sepanjang tahun 2025, Bank memastikan bahwa seluruh anggota Dewan Komisaris telah memenuhi persyaratan regulator dengan lulus uji kemampuan dan kepatutan sesuai Peraturan Otoritas Jasa Keuangan No. 27/POJK.03/2016. Hal ini mencerminkan komitmen Bank dalam menjaga tata kelola yang baik serta memastikan bahwa setiap anggota Dewan Komisaris memiliki integritas, kompetensi, dan profesionalisme yang dibutuhkan. Informasi lebih lanjut mengenai hasil penilaian tersebut dapat dilihat pada profil masing-masing anggota di Bab Profil Perusahaan.

Fit and Proper Test for the Board of Commissioners

Throughout 2025, the Bank ensured that all members of the Board of Commissioners met regulatory requirements by passing the fit and proper test in accordance with Financial Services Authority Regulation No. 27/POJK.03/2016. This matter reflects the Bank's commitment to maintaining good governance and ensuring that each member of the Board of Commissioners has the required integrity, competency, and professionalism. Further information regarding the results of these assessments can be seen in the profile of each member in the Company Profile chapter.

Komisaris Independen

Mengacu pada Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, komposisi Dewan Komisaris wajib terdiri dari paling sedikit 50% Komisaris Independen. Pada tahun 2025, Bank telah memenuhi ketentuan tersebut dengan memiliki 2 (dua) Komisaris Independen atau sebesar 66,67% dari

Independent Commissioner

Referring to the Financial Services Authority Regulation No. 17 of 2023 on Governance Implementation for Commercial Banks, the composition of the Board of Commissioners shall consist of at least 50% Independent Commissioners. In 2025, the Bank complied with these requirements by having 2 (two) total 3 (tiga) anggota Dewan Komisaris. Seluruh Komisaris Independen dimaksud telah memenuhi persyaratan yang ditetapkan oleh regulator sebagai berikut:

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.
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 serta lulus uji kemampuan dan kepatutan sesuai ketentuan yang ditetapkan oleh Otoritas Jasa Keuangan.

Rapat Dewan Komisaris

Kebijakan Rapat Dewan Komisaris

Dewan Komisaris menyelenggarakan rapat secara berkala paling sedikit sekali dalam 2 (dua) bulan, dengan kehadiran fisik seluruh anggota Dewan Komisaris paling sedikit 2 (dua) kali dalam setahun, yang diprioritaskan untuk evaluasi dan penetapan kebijakan strategis serta evaluasi RBB, serta menyelenggarakan rapat bersama Direksi paling sedikit sekali dalam 4 (empat) bulan.

Rapat dapat dilaksanakan secara fisik maupun melalui sarana teknologi telekonferensi sesuai ketentuan internal Bank dan dinyatakan sah apabila dihadiri oleh lebih dari setengah jumlah anggota, baik secara langsung maupun melalui sarana teknologi informasi. Keputusan rapat diambil berdasarkan musyawarah mufakat atau suara terbanyak apabila tidak tercapai mufakat, dan seluruh hasil rapat dituangkan dalam risalah rapat yang ditandatangani oleh pimpinan rapat serta didistribusikan kepada seluruh anggota Dewan Komisaris, termasuk pencatatan perbedaan pendapat apabila ada. Dalam hal rapat diselenggarakan melalui sarana teknologi telekonferensi, pelaksanaan rapat dilengkapi dengan dasar keputusan penyelenggaraan, bukti rekaman yang ditatausahakan sesuai ketentuan, serta risalah rapat yang ditandatangani oleh seluruh peserta rapat dan didistribusikan secara langsung atau elektronik.

Independent Commissioners, or 66.67% of the total 3 (three) members of the Board of Commissioners. All such Independent Commissioners have met the following regulatory requirements:

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.
4. Not having business relationship, either directly or indirectly, that are related to the Bank's business activities.

Statement of Independency

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

Board of Commissioners' Meetings

Board of Commissioners' Meeting Policy

The Board of Commissioners holds regular meetings at least once every 2 (two) months, with all members of the Board of Commissioners present in person at least twice a year, prioritized to evaluate and determine strategic policies and evaluate RBB, and holds joint meetings with the Board of Directors at least once every 4 (four) months.

Meetings can be held in person or via teleconference technology in accordance with the Bank's internal regulations and are deemed valid if attended by more than half of the members, either in person or through information technology. Meeting decisions are made by consensus or by majority vote in the event consensus is not reached. All meeting results are recorded in the minutes of meeting, signed by the meeting chair and distributed to all members of the Board of Commissioners, including any dissenting opinions. In the event a meeting is held via teleconference technology, the meeting shall be conducted based on decision to hold the meeting, recorded evidence administered in accordance with regulations, and minutes of the meeting signed by all meeting participants and distributed either directly or electronically.

Frekuensi Kehadiran Rapat Dewan Komisaris [G-02]

Rekapitulasi kehadiran masing-masing Dewan Komisaris dalam rapat di tahun 2025 sebagai berikut:

Board of Commissioners' Frequency of Attendance in Meetings [G-02]

The summary of attendance of each member of the Board of Commissioners at meetings in 2025 is as follows:

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	6	6	100.00	6	6	100.00
Gunawan Tenggarahardja	Komisaris Independen Independent Commissioner	6	6	100.00	6	4	66.67
Sia Leng Ho	Komisaris Commissioner	6	6	100.00	6	6	100.00
Rata-Rata Kehadiran (%) Average Attendance (%)				100.00			88.89

Kehadiran Dewan Komisaris dalam RUPS tercantum pada bagian yang membahas Rapat Umum Pemegang Saham.

The attendance of the Board of Commissioners at GMS is stated in the section that discusses General Meeting of Shareholders.

Agenda Rapat Internal Dewan Komisaris

Rapat internal Dewan Komisaris membahas berbagai agenda, antara lain:

1. Laporan Direktur Kepatuhan Periode Semester II Tahun 2024.
2. Laporan Tingkat Kesehatan Bank Periode Semester II Tahun 2024.
3. Laporan Keuangan dan Pengendalian Internal Triwulan IV Tahun 2024.
4. Masa tugas anggota Komite Audit.
5. Perubahan anggota Komite Audit dan Komite Pemantau Risiko.
6. *Roadmap* Digital Bank Victoria.
7. Rencana kerja Dewan Komisaris tahun 2026.

Agenda of Board of Commissioners' Internal Meeting

The Board of Commissioners' Internal meeting discusses various agenda items, including:

1. Compliance Director's Report for Semester II of 2024.
2. Bank Sound Level Report for Semester II of 2024.
3. Financial Statements and Internal Control Report for Quarter IV of 2024.
4. Term of office of Audit Committee members.
5. Changes to Audit Committee and Risk Monitoring Committee members.
6. Bank Victoria Digital Roadmap.
7. Board of Commissioners' work plan for 2026.

Agenda Rapat Gabungan dengan Direksi

Rapat gabungan Dewan Komisaris dan Direksi membahas berbagai agenda, antara lain:

1. Kinerja Bank Victoria periode 31 Desember 2024 dan proyeksi Januari 2025.
2. Kinerja Bank Victoria periode 31 Maret 2025.
3. Kinerja Bank Victoria periode 30 Juni 2025 (proyeksi).
4. Kinerja Bank Victoria periode 31 Agustus 2025 dan proyeksi periode 30 September 2025.
5. Kinerja Bank Victoria periode 31 Oktober 2025 dan proyeksi periode 30 November 2025.

Agenda of Joint Meeting with Board of Directors

Joint meeting of the Board of Commissioners and Board of Directors discusses various agenda items, including:

1. Bank Victoria's performance as of 31 December 2024 and projections for January 2025.
2. Bank Victoria's performance as of 31 March 2025.
3. Bank Victoria's performance as of 30 June 2025 (projections).
4. Bank Victoria's performance as of 31 August 2025 and projections for 30 September 2025.
5. Bank Victoria's performance as of 31 October 2025 and projections for 30 November 2025.

6. RBB 2026-2028.
7. Kinerja Bank Victoria periode 30 November 2025 dan proyeksi 31 Desember 2025.

6. RBB 2026-2028.
7. Bank Victoria's performance as of 30 November 2025 and projections for 31 December 2025.

Persetujuan dan Rekomendasi Dewan Komisaris

Mengacu pada Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 serta No. 17 Tahun 2023, keputusan-keputusan yang memerlukan persetujuan Dewan Komisaris ditetapkan sebagai berikut:

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.
    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.

Sepanjang tahun 2025, Dewan Komisaris memberikan 17 (tujuh belas) persetujuan dan rekomendasi yang mencakup berbagai aspek strategis dalam pengelolaan Bank. Beberapa di antaranya meliputi arahan hasil penelaahan terhadap Laporan Keuangan Tahunan dan pengendalian internal, pembagian tugas serta wewenang anggota Direksi, serta hasil evaluasi terhadap Laporan Tingkat Kesehatan Bank. Selain itu, Dewan Komisaris juga memberikan arahan terkait hasil penelaahan Laporan Direktur Kepatuhan dan Manajemen Risiko, Laporan Hasil Pemeriksaan SKAI, serta Laporan Profil Risiko.

Board of Commissioners' Approvals and Recommendations

Referring to the Financial Services Authority Regulation No. 55/POJK.03/2016 and No. 17 of 2023, decisions requiring the approval of the Board of Commissioners are determined as follows:

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.
    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.

Throughout 2025, the Board of Commissioners issued 17 (seventeen) approvals and recommendations covering various strategic aspects in the management of the Bank. Some of these included directives on the review results of Annual Financial Statements and internal control, division of duties and authorities of Board of Directors' members, and evaluation results of the Bank's Sound Level Report. In addition, the Board of Commissioners also provided directives related to the review results of Compliance and Risk Management Director's Report, SKAI Audit Result Report, and Risk Profile Report.

Sertifikasi Manajemen Risiko Dewan Komisaris

Sebagai wujud komitmen terhadap peningkatan kualitas tata kelola, seluruh anggota Dewan Komisaris Bank pada tahun 2025 telah menyelesaikan sertifikasi manajemen risiko. Pencapaian ini mencerminkan kepatuhan terhadap regulasi yang berlaku sekaligus memperkuat kompetensi Dewan Komisaris dalam menjalankan fungsi pengawasan. Detail mengenai sertifikasi masing-masing anggota dapat ditemukan pada bab Profil Perusahaan.

Board of Commissioners' Risk Management Certification

As the manifestation of its commitment to improving the quality of governance, all members of the Bank's Board of Commissioners completed risk management certification in 2025. This achievement reflects compliance with applicable regulations and strengthens the Board of Commissioners' competence in performing its supervisory function. Details regarding each member's certification can be found in the Company Profile chapter.

Direksi
Board of Directors

Direksi merupakan organ Bank yang bertanggung jawab penuh atas pengelolaan dan mewakili Bank sesuai Anggaran Dasar serta peraturan yang berlaku. Direksi berwenang mengarahkan operasional, menetapkan kebijakan, dan mengambil langkah strategis guna memastikan efisiensi dan efektivitas kinerja Bank.

The Board of Directors is the Bank's organ fully responsible for managing and representing the Bank in accordance with the Articles of Association and applicable regulations. The Board of Directors has the authority to direct operations, determine policies, and take strategic steps to ensure the efficiency and effectiveness of the Bank's performance.

Pedoman Direksi

Dalam melaksanakan tugasnya, Direksi memiliki pedoman dan tata tertib kerja yang dikenal sebagai *Board of Directors Charter (BOD Charter)*, yang telah diperbarui dan disahkan melalui Keputusan Direksi No. 006A/SK-DIR/12/23 tanggal 6 Desember 2023.

Board of Directors Charter

In performing its duties, the Board of Directors has charter and work guidelines known as Board of Directors Charter (BOD Charter), updated and ratified through the Board of Directors' Decision No. 006A/SK-DIR/12/23 dated 6 December 2023.

Ruang Lingkup Pekerjaan dan Tanggung Jawab Masing-Masing Anggota Direksi

Berdasarkan Keputusan No. 002/SK-KOM/08/25 tanggal 6 Agustus 2025 tentang Pembagian Tugas dan Wewenang Anggota *Board of Directors*, ruang lingkup tugas dan tanggung jawab masing-masing anggota Direksi sebagai berikut:

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

Based on the Decision No. 002/SK-KOM/08/25 dated 6 August 2025 on the Division of Duties and Authorities of the Board of Directors' Members, the scope of duties and responsibilities of each member of the Board of Directors is as follows:

Nama dan Jabatan Name and Position	Tugas dan Tanggung Jawab	Duties and Responsibilities
Achmad Friscantono Direktur Utama President Director	Koordinasi pengelolaan Bank Victoria yang membawahi Divisi: • *SEVP of Change Management Office.* • *Change Management Office Division.* • *SKAI Division.* • *Treasury Division.* • *Information Technology Division.* • *Corporate Legal Division.*	Coordination of Bank Victoria management which oversees the Divisions of: • SEVP of Change Management Office. • Change Management Office Division. • SKAI Division. • Treasury Division. • Information Technology Division. • Corporate Legal Division.
Rusli Wakil Direktur Utama Deputy President Director	Wakil Direktur Utama yang membawahi Divisi/ Departemen: • *SEVP of Operations & International Banking.* • *Operations & Internal Control Division.* • *International Banking Division.* • *Special Asset Management Division.* • *Credit Risk Review Division.* • *HCM & General Affair Division.* • *Credit Monitoring & Collection.*	Deputy President Director in charge of Divisions/ Department of: • SEVP of Operations & International Banking. • Operations & Internal Control Division. • International Banking Division. • Special Asset Management Division. • Credit Risk Review Division. • HCM & General Affair Division. • Credit Monitoring & Collection.
Lembing Direktur Bisnis Director of Business	Direktur Bisnis yang membawahi Divisi: • *SEVP of Commercial.* • *Commercial Banking Division.* • *SEVP of SME.* • *SME & Consumer Banking Division.*	Director of Business in charge of Divisions of: • SEVP of Commercial. • Commercial Banking Division. • SEVP of SME. • SME & Consumer Banking Division.

Nama dan Jabatan Name and Position	Tugas dan Tanggung Jawab Duties and Responsibilities	
Debora Wahjutirto Tanoyo Direktur Keuangan Director of Finance	Direktur Keuangan yang membawahi Divisi/Departemen: • *SEVP of Finance, Accounting & Management Information System.* • *Accounting Division.* • *Management Information System (MIS).* • *Loan & Trade Operations Division.* • *Credit Legal Division.* • *Branch Banking Network Division.* • *Marketing Communication, Brand & Product Division.*	Director of Finance in charge of Divisions/Department of: • SEVP of Finance, Accounting & Management Information System. • Accounting Division. • Management Information System (MIS). • Loan & Trade Operations Division. • Credit Legal Division. • Branch Banking Network Division. • Marketing Communication, Brand & Product Division.
Tamunan Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	Direktur Kepatuhan dan Manajemen Risiko yang membawahi Divisi/Departemen: • *Compliance, System Procedure & Coordinator Customer Protection Division.* • *Risk Management Division.* • *Corporate Secretary Division.* • *Anti-Fraud & Internal Control Over Financial Reporting (ICOFR).* • *Anti-Money Laundering, Counter Terrorist Financing & Weapon Mass Destruction (AML, CTF & WMD).*	Compliance and Risk Management Director in charge of Division/Department: • Compliance, System Procedure & Coordinator Customer Protection Division. • Risk Management Division. • Corporate Secretary Division. • Anti-*Fraud & Internal Control Over Financial Reporting (ICOFR).* • Anti-Money Laundering, Counter-Terrorist Financing & Weapon Mass Destruction (AML, CTF & WMD).

Wewenang Direksi

Dalam melaksanakan peran dan tanggung jawabnya, Direksi Bank memiliki sejumlah kewenangan yang menjadi pedoman utama dalam pengelolaan dan pengambilan keputusan, yaitu:

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.
3. Memperoleh, mengalihkan, atau melepaskan dengan cara apapun hak-hak atas barang-barang tidak bergerak dan Bank.

Authority of the Board of Directors

In performing its roles and responsibilities, the Bank's Board of Directors has a number of authorities that serve as the primary guidelines for managing and making decision, namely:

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.
3. To obtain, transfer, or waive by any means the rights to immovable property and the Bank.

Jumlah, Komposisi, dan Independensi Direksi

Jumlah dan Komposisi

Direksi Bank terdiri dari sekurang-kurangnya 3 (tiga) anggota, yaitu seorang Direktur Utama yang independen terhadap Pemegang Saham Pengendali serta minimal 2 (dua) Direktur lainnya. Apabila diperlukan, dapat diangkat seorang Wakil Direktur Utama. Masa jabatan anggota Direksi adalah 3 (tiga) tahun sejak ditetapkan oleh RUPS hingga penutupan RUPS Tahunan ketiga, dengan tetap memperhatikan ketentuan peraturan perundang-undangan dan Anggaran Dasar.

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

Number and Composition

The Bank's Board of Directors shall consist of at least 3 (three) members, comprising one President Director who is independent of the Controlling Shareholder and a minimum of 2 (two) other Directors. If necessary, one Deputy President Director may be appointed. The term of office of members of the Board of Directors is 3 (three) years from the date of their appointment by the GMS until the closing of the third Annual GMS, with due observance of compliance with laws and regulations and Articles of Association.

Pada tahun 2025, komposisi Direksi Bank yang diangkat berdasarkan Keputusan RUPS Tahunan tanggal 20 Juni 2025 untuk masa jabatan 2025-2028 sebagai berikut:

Direktur Utama	: Achmad Friscantono
Wakil Direktur Utama	: Rusli
Direktur	: Lembing
Direktur	: Debora Wahjutirto Tanoyo
Direktur Kepatuhan dan Manajemen Risiko	: Tamunan

In 2025, the composition of the Bank's Board of Directors, appointed based on the Resolution of Annual GMS dated 20 June 2025, for the 2025-2028 term of office, is as follows:

President Director	: Achmad Friscantono
Deputy President Director	: Rusli
Director	: Lembing
Director	: Debora Wahjutirto Tanoyo
Director of Compliance and Risk Management	: Tamunan

Independensi

Independensi Direksi merupakan prinsip penting untuk memastikan Direksi dapat bertindak objektif dan bebas dari benturan kepentingan maupun intervensi pihak lain. Untuk itu, anggota Direksi dilarang melakukan atau menerima tindakan yang dapat mengganggu kemandirian dalam pengelolaan Bank, termasuk menerima imbalan, fasilitas, maupun keuntungan pribadi dari pihak berkepentingan. Direksi juga wajib menolak setiap perintah atau permintaan dari Pemegang Saham atau pihak terafiliasi yang bertentangan dengan prinsip GCG, berpotensi merugikan, atau dapat mengurangi keuntungan Bank.

Independence

The independence of the Board of Directors is a crucial principle to ensure that the Board of Directors can act objectively and are free from any conflicts of interest or interference from other parties. Therefore, members of the Board of Directors are prohibited from taking or accepting actions that could compromise the independence of the Bank's management, including accepting rewards, facilities, or personal benefits from interested parties. The Board of Directors shall also reject any orders or requests from Shareholders or affiliated parties that are contrary to GCG principles, potentially harmful, or could reduce the Bank's profits.

Penilaian Kemampuan dan Kepatutan Direksi

Sepanjang tahun 2025, Bank memastikan bahwa seluruh anggota Direksi telah memenuhi persyaratan regulator dengan lulus uji kemampuan dan kepatutan sesuai Peraturan Otoritas Jasa Keuangan No. 27/POJK.03/2016. Hal ini mencerminkan komitmen Bank dalam menjaga tata kelola yang baik serta memastikan bahwa setiap anggota Direksi memiliki integritas, kompetensi, dan profesionalisme yang dibutuhkan. Informasi lebih lanjut mengenai hasil penilaian tersebut dapat dilihat pada profil masing-masing anggota di Bab Profil Perusahaan.

Fit and Proper Test for the Board of Directors

Throughout 2025, the Bank ensured that all members of the Board of Directors met regulatory requirements by passing the fit and proper test in accordance with Financial Services Authority Regulation No. 27/POJK.03/2016. This matter reflects the Bank's commitment to maintaining good governance and ensuring that each member of the Board of Directors has the required integrity, competency, and professionalism. Further information regarding the results of these assessments can be seen in the profile of each member in the Company Profile chapter.

Rapat Direksi

Kebijakan Rapat Direksi

Direksi wajib mengadakan rapat baik secara *online* maupun *offline* sekurang-kurangnya sekali dalam sebulan serta rapat bersama Dewan Komisaris setiap 4 (empat) bulan. Rapat sah apabila dihadiri mayoritas anggota Direksi dan keputusan diambil berdasarkan musyawarah mufakat atau suara terbanyak. Risalah rapat wajib dibuat, ditandatangani peserta, memuat perbedaan pendapat bila ada, serta disimpan sesuai ketentuan perundang-undangan sebagai bukti sah keputusan Direksi. Hasil rapat didokumentasikan secara tertulis dengan memuat paling sedikit agenda pembahasan, daftar hadir, dan keputusan/hasil pembahasan.

Board of Directors' Meetings

Board of Directors' Meeting Policy

The Board of Directors shall hold meetings, both online and offline, at least once a month, and joint meetings with the Board of Commissioners every 4 (four) months. A meeting is valid if attended by a majority of Board of Directors' members, and decisions are made by consensus or majority vote. Minutes of meetings shall be prepared, signed by participants, including any dissenting opinions, and kept in accordance with laws and regulations as valid evidence of the Board of Directors' decisions. Meeting results are documented in writing, including at least the discussion agenda, attendance list, and decisions/outcomes.

Frekuensi Kehadiran Rapat Direksi [G-02]

Rekapitulasi kehadiran masing-masing Direksi dalam rapat di tahun 2025 sebagai berikut:

Board of Directors' Frequency of Attendance in Meetings [G-02]

The summary of attendance of each member of the Board of Directors at meetings in 2025 is as follows:

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 Attendance	Tingkat Kehadiran Attendance Rate (%)	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Achmad Friscantono	Direktur Utama President Director	49	45	91.84	6	6	100.00
Rusli	Wakil Direktur Utama Deputy President Director	49	46	93.88	6	6	100.00
Lembing	Direktur Director	49	42	85.71	6	6	100.00
Debora Wahjutirto Tanoyo	Direktur Director	49	44	89.80	6	6	100.00
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	49	48	97.96	6	6	100.00
Rata-Rata Kehadiran (%) Average Attendance (%)				**91.84**			**100.00**

Kehadiran Direksi dalam RUPS tercantum pada bagian yang membahas Rapat Umum Pemegang Saham.

The attendance of the Board of Directors at GMS is stated in the section that discusses General Meeting of Shareholders.

Agenda Rapat Internal Direksi

Agenda yang dibahas dalam rapat internal Direksi meliputi kinerja kredit, *pipeline* dan realisasi Agunan Yang Diambil Alih (AYDA) serta *Write-Off* (WO), kinerja keuangan, serta pembahasan lain-lain.

Agenda of Board of Directors' Internal Meeting

The agenda discussed in the Board of Directors' internal meeting includes credit performance, pipeline and realization of Foreclosed Collateral (AYDA) and Write-Off (WO), financial performance, and other discussions.

Agenda Rapat Gabungan dengan Dewan Komisaris

Agenda yang dibahas dalam rapat gabungan Direksi dengan Dewan Komisaris telah disampaikan pada bagian Rapat Dewan Komisaris.

Agenda of Joint Meeting with Board of Commissioners

The agenda discussed in the joint meetings of Board of Directors and Board of Commissioners has been submitted to the Board of Commissioners' Meeting section.

Persetujuan dan Rekomendasi Direksi

Sepanjang tahun 2025, Direksi aktif menjalankan fungsi pengambilan keputusan strategis dengan mengeluarkan 198 persetujuan dan rekomendasi yang mendukung penguatan tata kelola Bank. Beberapa di antaranya terkait dengan kebijakan manajemen risiko, kebijakan perkreditan,

Board of Directors' Approvals and Recommendations

Throughout 2025, the Board of Directors actively carried out its strategic decision-making function by issuing 198 approvals and recommendations that supported the strengthening of the Bank's governance. Some of them were related to risk management policies, credit policies, kebijakan tata kelola perusahaan, sistem keamanan informasi, kebijakan kepatuhan, strategi anti-*fraud*, serta berbagai standar operasional prosedur yang mendukung operasional perbankan, layanan digital, dan produk perbankan.

corporate governance policies, information security system, compliance policies, anti-fraud strategy, and various standard operating procedures that supported banking operations, digital services, and banking products.

Sertifikasi Manajemen Risiko Direksi

Seluruh anggota Direksi pada tahun 2025 telah memenuhi kewajiban kepemilikan sertifikasi manajemen risiko sesuai Peraturan Otoritas Jasa Keuangan No. 24 Tahun 2022 tentang Pengembangan Kualitas Sumber Daya Manusia Bank Umum. Kepatuhan ini mencerminkan komitmen Bank dalam memperkuat kompetensi dan profesionalisme pengurus, yang informasinya tercantum pada bagian Profil Perusahaan.

Board of Directors' Risk Management Certification

All members of the Board of Directors in 2025 met the requirements to hold risk management certification as per Financial Services Authority Regulation No. 24 of 2022 on Human Resources Quality Development for Commercial Banks. This compliance reflects the Bank's commitment to strengthening its management competency and professionalism, information about which is listed in the Company Profile section.

Rangkap Jabatan Dewan Komisaris dan Direksi

Concurrent Positions of the Board of Commissioners and Board of Directors

Bank menetapkan aturan mengenai larangan rangkap jabatan bagi Dewan Komisaris dan Direksi dengan berpedoman pada Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola Bank Umum, 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.

The Bank establishes rules on prohibition of concurrent positions for the Board of Commissioners and Board of Directors in accordance with Financial Services Authority Regulation No. 17 of 2023 on Governance for Commercial Banks, outlined 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. 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.
7. Komisaris Independen dilarang merangkap jabatan sebagai pejabat publik.

Tidak termasuk rangkap jabatan Dewan Komisaris dalam hal:
1. Dewan Komisaris menjabat sebagai anggota Direksi, anggota Dewan Komisaris, atau pejabat eksekutif yang melaksanakan fungsi pengawasan pada 1 (satu) Entitas Anak bukan Bank yang dikendalikan oleh Bank.
2. Komisaris Non-Independen menjalankan tugas fungsional dari Pemegang Saham Bank yang berbentuk badan hukum pada Bank dan/atau kelompok usaha Bank. dan/atau
3. Dewan Komisaris menduduki jabatan pada organisasi atau lembaga nirlaba, sepanjang tidak mengakibatkan yang bersangkutan mengabaikan pelaksanaan tugas dan tanggung jawab sebagai anggota Dewan Komisaris.

Sementara itu, termasuk rangkap jabatan dalam hal anggota Direksi:
1. Bertanggung jawab terhadap pengawasan atas penyertaan Bank pada Entitas Anak.
2. Menjalankan tugas fungsional menjadi anggota Dewan Komisaris pada Entitas Anak bukan Bank yang dikendalikan oleh Bank.
3. Bertanggung jawab terhadap pengawasan dana pensiun atau menjalankan tugas sebagai Dewan Pengawas dana pensiun, yang dimiliki oleh Bank.
4. Melaksanakan tugas sebagai Direktur pengganti.
5. Menduduki jabatan pada organisasi atau lembaga nirlaba, sepanjang tidak mengakibatkan yang bersangkutan mengabaikan pelaksanaan tugas dan tanggung jawab sebagai anggota Direksi.

Data mengenai rangkap jabatan Dewan Komisaris dan Direksi disajikan secara lengkap pada profil masing-masing anggota dalam bab Profil Perusahaan.

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.
7. Independent Commissioners are prohibited from holding concurrent position as public officials.

Not including concurrent positions for the Board of Commissioners in the following cases:
1. The Board of Commissioners serves as member of Board of Directors, member of Board of Commissioners, or executive officer performing supervisory functions at 1 (one) Non-Bank Subsidiary controlled by the Bank.
2. Non-Independent Commissioner performing functional duties from the Bank's Shareholders in the form of legal entity at the Bank and/or the Bank's business group. and/or
3. The Board of Commissioners holds position in non-profit organization or institution, as long as it does not result in the person concerned neglecting the implementation of duties and responsibilities as a member of the Board of Commissioners.

Meanwhile, including concurrent positions for members of the Board of Directors in the following cases:
1. Responsible for supervising the Bank's investments in Subsidiaries.
2. Performing functional duties as member of Board of Commissioners in Non-Bank Subsidiary controlled by the Bank.
3. Responsible for supervising pension funds or carrying out duties as Supervisory Board for pension funds, owned by the Bank.
4. Carrying out duties as substitute Director.
5. Holding position in non-profit organization or institution, as long as it does not result in the person concerned neglecting the implementation of duties and responsibilities as a member of the Board of Directors.

Data on concurrent positions held by the Board of Commissioners and Board of Directors is presented completely in each member's profile in the Company Profile chapter.

Penilaian Kinerja Dewan Komisaris, Direksi, Komite Pendukung Dewan Komisaris, serta Komite dan Organ Pendukung Direksi [G-04]

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

Proses evaluasi kinerja Dewan Komisaris di Bank Victoria dilaksanakan secara rutin setiap tahun sebagai bagian dari penerapan prinsip GCG. Evaluasi dilakukan dengan melibatkan Komite Remunerasi dan Nominasi melalui 2 (dua) metode, yaitu penilaian sendiri dan *peer evaluation*. Penilaian sendiri dilaksanakan oleh masing-masing anggota Dewan Komisaris dengan mengacu pada ketentuan dalam Peraturan Otoritas Jasa Keuangan mengenai Tata Kelola bagi Bank Umum. Sementara itu, *peer evaluation* dilakukan antar anggota Dewan Komisaris, di mana setiap anggota memberikan penilaian terhadap kinerja rekan-rekannya sesuai dengan bidang pengawasan dan tanggung jawab yang diemban. Selanjutnya, hasil dari proses evaluasi tersebut disampaikan oleh Komite Remunerasi dan Nominasi kepada Pemegang Saham sebelum pelaksanaan RUPS Tahunan, untuk dijadikan dasar dalam pengambilan keputusan terkait remunerasi serta dalam menilai efektivitas kinerja Dewan Komisaris.

Pihak yang Melakukan Penilaian Kinerja Dewan Komisaris

Pelaksanaan penilaian sendiri dikoordinasikan oleh Divisi *Compliance, System Procedure & Coordinator Customer Protection*, kemudian hasilnya disampaikan kepada Dewan Komisaris melalui Komite Remunerasi dan Nominasi. Adapun penilaian *peer evaluation* dilaksanakan secara langsung oleh setiap anggota Dewan Komisaris terhadap kinerja sesama anggota berdasarkan peran dan tanggung jawab masing-masing.

Kriteria Penilaian Kinerja Dewan Komisaris

Untuk penilaian sendiri, kriteria penilaian meliputi 20 (dua puluh) indikator *governance structure*, 23 (dua puluh tiga) indikator governance process, dan 6 (enam) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum.

Board of Commissioners' Performance Asssessment

Procedures for the Board of Commissioners' Performance Assessment

The performance evaluation process for the Board of Commissioners at Bank Victoria is conducted routinely every year as part of GCG principles implementation. Evaluation is carried out by involving Remuneration and Nomination Committee through 2 (two) methods, namely self-assessment and peer evaluation. Self-assessment is conducted by each member of the Board of Commissioners in accordance with the provisions of Financial Services Authority Regulation on Governance for Commercial Banks. Meanwhile, peer evaluation is conducted among members of the Board of Commissioners, with each member assessing colleague performance according to respective supervision areas and responsibilities. The results of this evaluation process are then submitted by the Remuneration and Nomination Committee to Shareholders prior to the Annual GMS to serve as a basis for making decisions regarding remuneration and assessing the effectiveness of the Board of Commissioners' performance.

Party Assessing the Board of Commissioners' Performance

Self-assessment is coordinated by the Compliance, System Procedure & Coordinator Customer Protection Division, and the results are then submitted to the Board of Commissioners through Remuneration and Nomination Committee. Peer evaluations are conducted directly by each member of Board of Commissioners on fellow member performance based on respective roles and responsibilities.

Criteria for Assessing the Board of Commissioners' Performance

For self-assessment, its criteria include 20 (twenty) governance structure indicators, 23 (twenty three) governance process indicators, and 6 (six) governance outcome indicators as stipulated in Attachment III of the Financial Services Authority Circular No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks.

Sementara untuk *peer evaluation*, kriteria penilaian meliputi:

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.
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.

Meanwhile, for peer evaluation, the assessment criteria include:

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.
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

Evaluasi kinerja Dewan Komisaris, baik secara kolektif maupun individual, merupakan instrumen penting dalam memastikan efektivitas pengawasan dan tata kelola Bank. Hasil evaluasi tersebut digunakan sebagai dasar dalam penetapan kompensasi dan insentif, sekaligus menjadi acuan bagi Pemegang Saham dalam memutuskan kelanjutan masa jabatan, pemberhentian, atau penunjukan kembali anggota Dewan Komisaris. Dengan demikian, proses penilaian tidak hanya berkaitan dengan aspek remunerasi, tetapi juga menentukan kesinambungan peran strategis Dewan Komisaris dalam kepemimpinan Bank.

Sebagai wujud transparansi dan akuntabilitas, hasil evaluasi kinerja Dewan Komisaris tahun 2025 disajikan sebagai berikut:

The Board of Commissioners' Performance Assessment Results

Performance evaluation of the Board of Commissioners, both collectively and individually, is a crucial instrument in ensuring the effectiveness of the Bank's supervision and governance. The results of this evaluation are used as the basis for determining compensation and incentives, and also serve as a reference for Shareholders in deciding on the continuation of term of office, dismissal, or reappointment of members of Board of Commissioners. Therefore, the assessment process is not only related to remuneration but also determines the continuity of the Board of Commissioners' strategic role in the Bank's leadership.

As the manifestation of transparency and accountability, the results of the Board of Commissioners' performance evaluation in 2025 were presented as follows:

Penilaian Sendiri Self-Assessment	Peer Evaluation
PPada tahun 2025, hasil penilaian sendiri Dewan Komisaris memperoleh nilai komposit "2 (dua)" dengan kategori "Baik". In 2025, the Board of Commissioners' self-assessment results obtained a composite score of "2 (two)" under the category of "Good".	Pada tahun 2025, hasil penilaian peer evaluation pelaksanaan tugas Dewan Komisaris memperoleh nilai komposit "2 (dua)" dengan kategori "Baik". In 2025, the peer evaluation results of the implementation of Board of Commissioners' duties obtained a composite score of "2 (two)" under the category of "Good".

Penilaian Kinerja Direksi

Prosedur Pelaksanaan Penilaian Kinerja Direksi

Penilaian terhadap kinerja Direksi dilaksanakan secara berkala sebagai bagian dari upaya memastikan pencapaian target Bank. Evaluasi dilakukan sekurang-kurangnya sekali dalam setahun, baik pada tingkat individu maupun kolektif. Proses ini mencakup 2 (dua) mekanisme utama. Pertama, penilaian sendiri oleh Direksi sesuai dengan ketentuan Otoritas Jasa Keuangan mengenai penerapan tata kelola bank umum, yang menitikberatkan pada pelaksanaan tugas dan tanggung jawab. Kedua, penilaian oleh Dewan Komisaris, yang dilakukan melalui prosedur yang diuraikan 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.
4. Hasil evaluasi KPI Direksi oleh Dewan Komisaris menjadi bahan penilaian pertanggungjawaban Direksi dalam pelaksanaan RUPS.

Pihak yang Melakukan Penilaian Kinerja Direksi

Pelaksanaan penilaian kinerja Direksi dilakukan melalui mekanisme yang terstruktur. Untuk penilaian sendiri, proses koordinasi berada di bawah Divisi *Compliance, System Procedure & Coordinator Customer Protection*, dengan hasil evaluasi yang kemudian disampaikan kepada Direksi serta Dewan Komisaris. Adapun penilaian oleh Dewan Komisaris penilaian dilakukan oleh Dewan Komisaris sebagai bentuk pengawasan dan akuntabilitas atas kinerja Direksi sepanjang periode berjalan.

Kriteria Penilaian Kinerja Direksi

Untuk penilaian sendiri, kriteria penilaian meliputi 17 (tujuh belas) indikator *governance structure*, 24 (dua puluh empat) indikator *governance process*, dan 12 (dua belas) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum.

Board of Directors' Performance Asssessment

Procedures for the Board of Directors' Performance Assessment

Assessment on the Board of Directors' performance is conducted periodically as an effort to ensure the achievement of the Bank's targets. Evaluations are conducted at least once a year, both at individual and collective levels. This process involves 2 (two) main mechanisms. First, self-assessment by the Board of Directors is in accordance with Financial Services Authority regulations on governance implementation for commercial banks, which emphasizes the implementation of duties and responsibilities. Second, assessment by the Board of Commissioners, conducted through the procedures outlined 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.
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.

Party Assessing the Board of Directors' Performance

The Board of Directors' performance assessment is carried out through a structured mechanism. For self-assessment, coordination process is under the Compliance, System Procedure & Coordinator Customer Protection Division, with the evaluation results then submitted to the Board of Directors and Board of Commissioners. Meanwhile, assessment by Board of Commissioners is conducted by the Board of Commissioners as a form of supervision and accountability for the Board of Directors' performance throughout the current period.

Criteria for Assessing the Board of Directors' Performance

For self-assessment, its criteria include 17 (seventeen) governance structure indicators, 24 (twenty four) governance process indicators, and 12 (twelve) governance outcome indicators as stipulated in Attachment III of the Financial Services Authority Circular No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks.

Sementara untuk penilaian oleh Dewan Komisaris, kriteria penilaian meliputi:

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 RBB.
4. Terlaksananya pengawasan atas tindak lanjut dari Direksi berdasarkan audit, rekomendasi SKAI, auditor eksternal, atau pengawasan Otoritas Jasa Keuangan.

Meanwhile, for assessment by Board of Commissioners, its criteria include:

1. The implementation of good leadership, teamwork, as well as communication and competency.
2. The implementation of GCG in each of the Bank's business activities.
3. The achievement of the RBB.
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 kinerja Direksi memiliki peran strategis dalam merumuskan kebijakan kompensasi dan pemberian insentif, sekaligus menjadi dasar pertimbangan utama bagi Pemegang Saham dalam menentukan keberlanjutan masa jabatan maupun penggantian anggota Direksi. Sebagai wujud komitmen terhadap prinsip transparansi dan akuntabilitas, Bank menyajikan ringkasan hasil penilaian kinerja Direksi untuk tahun 2025 sebagai berikut:

The Board of Directors' Performance Assessment Results

The results of Board of Directors' performance evaluation play a strategic role in formulating compensation and incentive policies, and serve as the primary consideration for Shareholders in determining the continuation of term of office or replacement of members of the Board of Directors. As the manifestation of commitment to principles of transparency and accountability, the Bank presents a summary of the Board of Directors' performance assessment results for 2025 as follows:

Penilaian Sendiri Self-Assessment	Penilaian oleh Dewan Komisaris Assessment by the Board of Commissioners
Pada tahun 2025, hasil penilaian sendiri Direksi memperoleh nilai komposit "2 (dua)" dengan kategori "Baik". In 2025, the Board of Directors" self-assessment results obtained a composite score of "2 (two)" under the category of "Good".	Pada tahun 2025, hasil penilaian kinerja Direksi oleh Dewan Komisaris memperoleh nilai komposit "2 (dua)" dengan kategori "Baik". In 2025, the Board of Directors' performance assessment results obtained a composite score of "2 (two)" under the category "Good".

Penilaian Kinerja Komite Pendukung Dewan Komisaris

Prosedur Pelaksanaan Penilaian Kinerja Komite Pendukung Dewan Komisaris

Dalam rangka memperkuat penerapan GCG, Dewan Komisaris melakukan pengawasan sekaligus evaluasi terhadap kinerja Komite Audit, Komite Pemantau Risiko, serta Komite Remunerasi dan Nominasi. Penilaian dilaksanakan secara berkala, sedikitnya sekali dalam setahun, baik pada tingkat individu maupun secara kolektif. Mekanisme evaluasi mencakup penilaian sendiri oleh masing-masing komite serta penilaian langsung oleh Dewan Komisaris. Hasil dari evaluasi tersebut digunakan untuk memastikan bahwa setiap komite menjalankan perannya secara optimal, mendukung strategi Bank, dan berkontribusi pada peningkatan efektivitas pengelolaan risiko serta pencapaian target perusahaan.

Performance Assessment of the Board of Commissioners' Supporting Committees

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

To strengthen GCG implementation, the Board of Commissioners supervises and evaluates the performance of Audit Committee, Risk Monitoring Committee, and Remuneration and Nomination Committee. Assessments are conducted periodically, at least once a year, both at individual and collective levels. The evaluation mechanism includes self-assessment by each committee as well as direct assessment by the Board of Commissioners. The results of these evaluations are used to ensure that each committee optimally carries out its role, supports the Bank's strategy, and contributes to increasing risk management effectiveness and achieving company targets.

Pihak yang Melakukan Penilaian Kinerja Komite Pendukung Dewan Komisaris

Proses penilaian mandiri atas kinerja komite pendukung Dewan Komisaris dikoordinasikan oleh Divisi *Compliance, System Procedure & Coordinator Customer Protection*, dengan hasil evaluasi yang dilaporkan kepada Dewan Komisaris. Di sisi lain, penilaian terhadap kinerja komite pendukung Dewan Komisaris oleh Dewan Komisaris dilaksanakan langsung oleh Dewan Komisaris sebagai bagian dari fungsi pengawasan.

Kriteria Penilaian Kinerja Komite Pendukung Dewan Komisaris

Untuk penilaian sendiri, kriteria penilaian meliputi 12 (dua belas)indikator *governance structure*, 6 (enam) indikator *governance process*, dan 2 (dua) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum.

Sementara untuk penilaian oleh Dewan Komisaris, kriteria penilaian dibuat secara umum dan diuraikan dengan penjelasan secara kualitatif (penilaian tidak dalam angka/skala) yang meliputi:

1. Kehadiran dalam rapat Komite.
2. Penguasaan materi yang akan dibahas.
3. Kesediaan menyediakan waktu dan upaya dalam memenuhi tugas dan tanggung jawab sebagai anggota komite.
4. Kesediaan 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.
8. Terlaksananya pemantauan dan evaluasi terhadap divisi/unit yang terkait dengan bidang tugas dan tanggung jawab masing-masing komite.

Party Assessing the Performance of the Board of Commissioners' Supporting Committees

The self-assessment process for the performance of committees supporting the Board of Commissioners is coordinated by the Compliance, System Procedure & Coordinator Customer Protection Division, with the evaluation results reported to the Board of Commissioners. Meanwhile, performance assessment of committees supporting the Board of Commissioners is carried out directly by the Board of Commissioners as part of its supervisory function.

Criteria for Assessing the Performance of the Board of Commissioners' Supporting Committees

For self-assessment, its criteria include 12 (twelve) governance structure indicators, 6 (six) governance process indicators, and 2 (two) governance outcome indicators as stipulated in Attachment III of the Financial Services Authority Circular No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks.

Meanwhile, for assessment by Board of Commissioners, its criteria are made in general and described with qualitative explanation (ratings are not in numbers/scales) which include:

1. Attendance at Committee's meeting.
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.
8. Implementation of monitoring and evaluation of divisions/units related to the respective areas of duties and responsibilities of each committee.

Penilaian Sendiri Self-Assessment	Penilaian oleh Dewan Komisaris Assessment by the Board of Commissioners
Pada tahun 2025, hasil penilaian sendiri pelaksanaan tugas dan tanggung jawab Komite pendukung Dewan Komisaris berada pada kategori "Good". In 2025, the self-assessment results of the implementation of duties and responsibilities of the Board of Commissioners' supporting committees were under the category of "Good".	**Komite Audit:** Dewan Komisaris menilai bahwa sepanjang tahun 2025 Komite Audit telah menunjukkan kinerja yang solid dalam mendukung efektivitas fungsi pengawasan. Komite Audit berperan aktif dalam menelaah rencana dan pelaksanaan audit, sekaligus memastikan setiap temuan ditindaklanjuti secara tepat oleh manajemen. Selain itu, Komite Audit turut memantau implementasi rekomendasi yang diberikan oleh auditor internal maupun eksternal. Upaya konsisten tersebut memberikan kontribusi nyata terhadap peningkatan kepatuhan, transparansi, dan kualitas tata kelola di lingkungan Bank. **Audit Committee:** The Board of Commissioners considered that throughout 2025, Audit Committee demonstrated solid performance in supporting the effectiveness of supervisory function. Audit Committee played an active role in reviewing audit plans and implementation, while ensuring that all findings were appropriately followed up by management. Furthermore, Audit Committee monitored the implementation of recommendations provided by internal and external auditors. These consistent efforts significantly contributed to improving compliance, transparency, and the quality of governance within the Bank.
	Komite Pemantau Risiko: Dewan Komisaris menilai bahwa sepanjang tahun 2025 Komite Pemantau Risiko telah menjalankan tugasnya dengan efektif dan memberikan kontribusi signifikan terhadap penguatan tata kelola risiko Bank. Komite Pemantau Risiko berperan aktif dalam mengidentifikasi serta menelaah potensi risiko yang dapat memengaruhi keberlangsungan operasional, sekaligus memberikan rekomendasi yang relevan untuk peningkatan sistem manajemen risiko. Melalui arahan yang strategis dan responsif terhadap dinamika lingkungan usaha, Komite Pemantau Risiko berhasil mendukung terciptanya keseimbangan antara pertumbuhan bisnis dan praktik pengelolaan risiko yang berkelanjutan. **Risk Monitoring Committee:** The Board of Commissioners considered that throughout 2025, the Risk Monitoring Committee carried out its duties effectively and made significant contribution to strengthening the Bank's risk governance. Risk Monitoring Committee played an active role in identifying and reviewing potential risks that could impact operational continuity and providing relevant recommendations for improving risk management system. Through strategic direction and responsiveness to the dynamics of business environment, the Risk Monitoring Committee managed to support the creation of a balance between business growth and sustainable risk management practices.
	Komite Remunerasi dan Nominasi: Dewan Komisaris menegaskan bahwa sepanjang tahun 2025 Komite Remunerasi dan Nominasi telah menjalankan perannya secara optimal dalam mendukung praktik GCG. Komite Remunerasi dan Nominasi berkontribusi melalui penyusunan kebijakan remunerasi yang adil dan kompetitif, sekaligus memastikan kesesuaian dengan kebutuhan dan kinerja Perseroan. Di samping itu, Komite juga berperan dalam mengkaji dan merekomendasikan calon anggota Dewan Komisaris, Direksi, maupun anggota komite independen dengan mempertimbangkan kompetensi, integritas, serta keselarasan dengan strategi jangka panjang Bank. Melalui langkah-langkah tersebut, Komite Remunerasi dan Nominasi turut memastikan keberlangsungan kepemimpinan yang efektif serta mendukung pencapaian tujuan strategis Bank. **Remuneration and Nomination Committee:** The Board of Commissioners confirmed that throughout 2025, Remuneration and Nomination Committee optimally performed its role in supporting GCG practices. The Remuneration and Nomination Committee contributed by developing fair and competitive remuneration policies, while ensuring that these policies were in line with the Company's needs and performance. Furthermore, the Committee also plays a role in reviewing and recommending candidates for the Board of Commissioners, Board of Directors, and independent committee members, by considering their competence, integrity, and alignment with the Bank's long-term strategy. Through these steps, the Remuneration and Nomination Committee helps ensure the continuity of effective leadership and support the achievement of the Bank's strategic objectives.

Penilaian Kinerja Komite dan Organ Pendukung Direksi

Prosedur dan Pihak yang Melakukan Penilaian Kinerja Komite dan Organ Pendukung Direksi

Evaluasi atas kinerja komite dan organ pendukung di bawah Direksi dilaksanakan secara tahunan untuk menilai efektivitas maupun kontribusi mereka dalam mendukung pencapaian sasaran perusahaan. Penilaian dilakukan baik secara individu

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

Evaluations of the performance of committees and supporting bodies under the Board of Directors are conducted annually to assess their effectiveness and contribution to the achievement of Company targets.

maupun kolektif berdasarkan sistem dan prosedur yang telah ditetapkan oleh Direksi, sehingga hasilnya bersifat transparan dan terukur. Direksi bertanggung jawab penuh terhadap proses ini, dengan tujuan memastikan peran setiap komite selaras dengan strategi bisnis, memperkuat tata kelola, dan mendorong efisiensi operasional. Hasil evaluasi selanjutnya menjadi dasar penting dalam merumuskan langkah perbaikan serta pengembangan kinerja komite di periode mendatang.

Assessments are conducted both individually and collectively based on systems and procedures established by the Board of Directors, ensuring transparent and measurable results. The Board of Directors is fully responsible for this process, with the aim of ensuring that the role of each committee is in line with business strategy, strengthening governance, and promoting operational efficiency. The evaluation results will then serve as an important basis for formulating steps to improve and develop the committee's performance in the coming period.

Kriteria Penilaian Komite dan Organ Pendukung Direksi

Dalam melakukan evaluasi, Direksi menetapkan sejumlah kriteria khusus sebagai acuan untuk menilai kinerja komite dan organ pendukungnya. Kriteria tersebut meliputi:

1. Kehadiran dalam rapat komite.
2. Penguasaan materi yang akan dibahas.
3. Kesediaan menyediakan waktu dan upaya dalam memenuhitugas dan tanggung jawab sebagai anggota komite.
4. Kesediaan 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.
8. Terlaksananya pemantauan dan evaluasi terhadap divisi/unit yang terkait dengan bidang tugas dan tanggung jawab masing-masing komite.

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

In conducting evaluation, the Board of Directors determines several specific criteria as a reference for assessing the performance of committees and their supporting bodies. These criteria include:

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.
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

Direksi menilai bahwa pada tahun 2025 seluruh komite dan organ pendukung telah melaksanakan perannya dengan efektif serta memberikan kontribusi nyata bagi Bank Victoria. Penilaian ini didasarkan pada hasil evaluasi menyeluruh terhadap laporan kinerja, rekomendasi, dan masukan yang disampaikan secara konsisten oleh masing-masing komite sesuai lingkup tanggung jawabnya. Direksi juga mencatat bahwa pelaksanaan tugas komite selaras dengan strategi perusahaan dan RBB tahun 2025, sekaligus mendukung penguatan tata kelola dan pencapaian sasaran bisnis. Peran aktif komite dan organ pendukung turut membantu Direksi dalam merespons dinamika usaha dan menjaga keberlanjutan kinerja Bank.

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

The Board of Directors considered that as of 2025, all committees and supporting bodies carried out their roles effectively and made a tangible contribution to Bank Victoria. This assessment is based on comprehensive evaluation of performance reports, recommendations, and input consistently submitted by each committee within its scope of responsibility. The Board of Directors also noted that the committee's duty implementation is in line with the company's strategy and the 2025 RBB, while also supporting the strengthening of governance and achievement of business targets. The active role of committees and supporting bodies also helps the Board of Directors in responding to business dynamics and maintaining the Bank's sustainable performance.

Pelatihan dan/atau Peningkatan Kompetensi Dewan Komisaris dan Direksi [G-05]

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

Kebijakan Pelatihan dan/atau Peningkatan Kompetensi Dewan Komisaris dan Direksi

Sebagai bentuk komitmen terhadap peningkatan kompetensi, Bank Victoria menetapkan kebijakan pengembangan profesional bagi Dewan Komisaris dan Direksi. Kebijakan ini mencakup program orientasi serta pengembangan keterampilan yang dirancang untuk memperdalam pemahaman mengenai peran, tanggung jawab, dan arah strategis Bank. Selain itu, Bank secara berkesinambungan menyelenggarakan berbagai kegiatan peningkatan kapasitas, seperti pelatihan, seminar, dan lokakarya. Setiap peserta diwajibkan membagikan pengalaman dan pengetahuan yang diperoleh kepada anggota lainnya, sehingga manfaat pembelajaran dapat dirasakan secara kolektif.

Rincian pelatihan dan program pengembangan kompetensi yang diikuti oleh Dewan Komisaris dan Direksi sepanjang tahun 2025 disajikan sebagai berikut:

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

As the commitment to competency development, Bank Victoria has established professional development policy for the Board of Commissioners and Board of Directors. This policy includes orientation and skills development programs designed to deepen understanding of the Bank's roles, responsibilities, and strategic direction. Furthermore, the Bank continuously organizes various capacity-building activities, such as training, seminar, and workshop. Each participant is required to share experiences and knowledge with other members, so that the benefits of learning can be felt collectively.

Details of the training and competency development programs attended by the Board of Commissioners and Board of Directors throughout 2025 are presented below:

Dewan Komisaris
Board of Commissioners

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance		
	Zaenal Abidin Ph.D	Gunawan Tenggarahardja	Sia Leng Ho
Webinar "Sustainability Accounting and Reporting in the Financial Services" – Diselenggarakan oleh OJK Institute Webinar "Sustainability Accounting and Reporting in the Financial Services" – Organized by OJK Institute	✓	✓	✓
Ujian Sertifikasi Manajemen Risiko Jenjang 7 – Diselenggarakan oleh Lembaga Sertifikasi Profesi Perbankan Examination of Risk Management Certification Level 7– Organized by Banking Profession Certification Institute	✓	-	-
Sharing Session "Suistainable Growth Through Digitalization and Strong Governance" – Diselenggarakan oleh Internal Bank Victoria Sharing Session "Sustainable Growth Through Digitalization and Strong Governance" – Organized by Bank Victoria Internally	✓	✓	✓
Training Refreshment Manajemen Risiko Jenjang 7 – Diselenggarakan oleh Arfaidhams Secret Training Refreshment of Risk Management Level 7 – Organized by Arfaidhams Secret	✓	✓	✓

Materi Pelatihan dan Penyelenggara **Training Materials and Organizers**	**Kehadiran** **Attendance**		
	Zaenal Abidin Ph.D	**Gunawan Tenggarahardja**	**Sia Leng Ho**
Pembekalan Sertifikasi Kompetensi Kepatuhan Jenjang 7 – Diselenggarakan oleh Forum Koordinasi dan Diskusi Kebijakan Perbankan Briefing of Compliance Competency Certification Level 7 – Organized by Banking Policy Coordination and Discussion Forum	✓	-	-
Training: Expert Sharing Session "Transformasi Digital IT Perbankan" – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia Training: Expert Sharing Session "Digital Transformation of Banking IT" – Organized by Indonesian Banking Development Institute	✓	✓	✓
Ujian Sertifikasi Kepatuhan Jenjang 7 – Diselenggarakan oleh Lembaga Sertifikasi Profesi Perbankan Examination of Compliance Certification Level 7– Organized by Banking Profession Certification Institute	✓	-	
Webinar Otoritas Jasa Keuangan Efek Domino Tarif Trump: Ancaman atau Peluang bagi Ekonomi Indonesia? – Diselenggarakan oleh Otoritas Jasa Keuangan Financial Services Authority Webinar on The Domino Effect of Trump's Tariffs: Threat or Opportunity for Indonesia's Economy? – Organized by Financial Services Authority	-	✓	✓
Team Building: "Work Life Balance" – Diselenggarakan oleh Internal Bank Victoria Team Building: "Work life Balance" – Organized by Bank Victoria Internally	-	✓	✓

Direksi
Board of Directors

Materi Pelatihan dan Penyelenggara **Training Materials and Organizers**	**Kehadiran** **Attendance**				
	Achmad Friscantono	**Rusli**	**Lembing**	**Debora Wahjutirto Tanoyo**	**Tamunan**
Sharing Session "Sustainable Growth Through Digitalization and Strong Governance" – Diselenggarakan oleh Internal Bank Victoria Sharing Session "Sustainable Growth Through Digitalization and Strong Governance" – Organized by Bank Victoria Internally	✓	✓	✓	✓	✓
Training Refreshment Manajemen Risiko Jenjang 7 – Diselenggarakan oleh BARA Training Refreshment of Risk Management Level 7 – Organized by BARA	✓	-	-	-	-
Webinar "Agnetic AI in Finance: A New Era of Autonomus Decision Making" – Diselenggarakan oleh Otoritas Jasa Keuangan Webinar "Agnetic AI in Finance: A New Era of Autonomus Decision Making" – Organized by Financial Services Authority	✓	-	-	-	-
Seminar Emiten 2025 – Diselenggarakan oleh PT Kustodian Sentral Efek Indonesia Issuer Seminar 2025 – Organized by PT Kustodian Sentral Efek Indonesia	✓	-	-	-	-
Seminar: *Sunline Banking Summit Indonesia 2025* "Modernisasi *Core Banking System* Perbankan sebagai Adaptasi Perbankan dalam Iklim *AI-Powered Evolution*" – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia	✓	-	-	-	-

Materi Pelatihan dan Penyelenggara **Training Materials and Organizers**	**Kehadiran** **Attendance**				
	Achmad Friscantono	**Rusli**	**Lembing**	**Debora Wahjutirto Tanoyo**	**Tamunan**
Seminar: Sunline Banking Summit Indonesia 2025 "Modernization of Banking Core Banking Systems as Banking Adaptation in an AI-Powered Evolution Climate" – Organized by Indonesian Banking Development Institute					
Webinar: Launching Kampanye Nasional Berantas Scam dan Aktivitas Keuangan Ilegal serta *Seminar Internasional Preventing and Combating Financial Scams* – Diselenggarakan oleh Satuan Tugas Pemberantasan Aktivitas Keuangan Ilegal Webinar: Launching of the National Campaign to Eradicate Scams and Illegal Financial Activities and International Seminar on Preventing and Combating Financial Scams – Organized by Task Force for the Eradication of Illegal Financial Activities	✓	-	-	-	-
Webinar: Risk and Governance Summit 2025 – Diselenggarakan oleh Otoritas Jasa Keuangan Webinar: Risk and Governance Summit 2025 – Organized by Financial Services Authority	✓	-	-	-	✓
Focus Group Discussion: Supervisi Otoritas Jasa Keuangan dalam Kegiatan Meaningful Participation – Diselenggarakan oleh Perhimpunan Bank Nasional Focus Group Discussion: Financial Services Authority Supervision in Meaningful Participation Activities – Organized by National Bank Association	✓	-	-	-	-
Seminar: Dengar Pendapat Terhadap Rancangan Surat Edaran Otoritas Jasa Keuangan *Internal Liquidity Adequacy Assessment Process* – Diselenggarakan oleh *Manaek Robert L. Toruan* Seminar: Public Hearing on the Draft Financial Services Authority Circular on Internal Liquidity Adequacy Assessment Process – Organized by Manaek Robert L. Toruan	✓	-	-	-	-
Seminar: *Green Energy Summit 2025* – Diselenggarakan oleh Investor Trust) Seminar: Green Energy Summit 2025 – Organized by Investor Trust	✓	-	-	-	-
Webinar: Peran Digital Forensik dalam Penanganan dan Pengungkapan Kejahatan Keuangan – Diselenggarakan oleh Otoritas Jasa Keuangan Webinar: The Role of Digital Forensics in Handling and Disclosing Financial Crimes – Organized by Financial Services Authority	✓	-	-	-	-
Training: Expert Sharing Session "Transformasi Digital IT Perbankan" – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia Training: Expert Sharing Session "Digital Transformation of Banking IT" – Organized by Indonesian Banking Development Institute	✓	✓	✓	✓	✓
Team Building: "Work Hard Vacation Harder" – Diselenggarakan oleh Internal Bank Victoria Team Building: "Work Hard Vacation Harder" – Organized by Bank Victoria Internally	✓	-	-	-	-
Sharing Session: Internal Liquidity Adequacy Assessment Process – Diselenggarakan oleh BARA Sharing Session: Internal Liquidity Adequacy Assessment Process – Organized by BARA	✓	-	-	-	-

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	**Kehadiran** Attendance				
	Achmad Friscantono	**Rusli**	**Lembing**	**Debora Wahjutirto Tanoyo**	**Tamunan**
Focus Group Discussion: Festival Ekonomi Keuangan Digital Indonesia dan Indonesia *Fintech Summit & Expo* (FEKDI x IFSE) 2025 – Diselenggarakan oleh Festival Ekonomi Keuangan Digital Indonesia Focus Group Discussion: Indonesia Digital Financial Economy Festival and Indonesia Fintech Summit & Expo (FEKDI x IFSE) 2025 – Organized by Indonesia Digital Economy and Finance Festival	✓	-	-	-	-
Forum Diskusi *"Synergizing Energy, Finance & Agribusiness for A Greener Future"* – Diselenggarakan oleh Infobank Discussion Forum "Synergizing Energy, Finance & Agribusiness for a Greener Future" – Organized by Infobank	✓	-	-	-	-
Seminar: *Economic Outlook* – Diselenggarakan oleh Perhimpunan Bank Nasional Seminar: Economic Outlook – Organized by the National Bank Association	✓	-	-	-	-
Webinar: World Financial Innovation Series – Diselenggarakan oleh YugabyteDB Indonesia Webinar: World Financial Innovation Series – Organized by YugabyteDB Indonesia	✓	-	-	-	-
Sharing Session Synergizing Banking and Fintech Ecosystem to 9 Expand Credit Access – Diselenggarakan oleh Perhimpunan Bank Nasional Sharing Session Synergizing Banking and Fintech Ecosystem to 9 Expand Credit Access – Organized by the National Bank Association	✓	-	-	-	-
Focus Group Discussion: Chief Financial Officer Forum – Diselenggarakan oleh Perhimpunan Bank Nasional Focus Group Discussion: Chief Financial Officer Forum – Organized by the National Bank Association	✓	-	-	-	-
Webinar "Sustainability Accounting and Reporting in the Financial Services" – Diselenggarakan oleh OJK Institute Webinar "Sustainability Accounting and Reporting in the Financial Services" – Organized by OJK Institute	-	✓	✓	✓	-
Training Refreshment Manajemen Risiko Jenjang 7 – Diselenggarakan oleh Arfaidhams Secret Training Refreshment of Risk Management Level 7 – Organized by Arfaidhams Secret	-	✓	✓	✓	-
Team Building: "Victoria Challenge Camp" – Diselenggarakan oleh Internal Bank Victoria Team Building: "Victoria Challenge Camp" – Organized by Bank Victoria Internally	-	✓	-	-	-
Webinar "How to Achieve a Peak Performance in 2025" – Diselenggarakan oleh OJK Institute Webinar "How to Achieve a Peak Performance in 2025" – Organized by OJK Institute	-	-	-	-	✓
Forum Penguatan Fungsi *Governance, Risk, and Compliance* - Harmoni dalam Kolaborasi untuk Penguatan Fungsi *Governance, Risk, and Compliance* di Sektor Jasa Keuangan – Diselenggarakan oleh Otoritas Jasa Keuangan Forum on Strengthening Governance, Risk, and Compliance Functions - Harmony in Collaboration to Strengthen Governance, Risk, and Compliance Functions in Financial Services Sector – Organized by Financial Services Authority	-	-	-	-	✓

Materi Pelatihan dan Penyelenggara **Training Materials and Organizers**	**Kehadiran** **Attendance**				
	Achmad Friscantono	**Rusli**	**Lembing**	**Debora Wahjutirto Tanoyo**	**Tamunan**
Webinar Customer Experience: Strategies for Success in Digital Era – Diselenggarakan oleh Otoritas Jasa Keuangan Webinar Customer Experience: Strategies for Success in Digital Era – Organized by Financial Services Authority	-	-	-	-	✓
Webinar Otoritas Jasa Keuangan Efek Domino Tarif Trump: Ancaman atau Peluang bagi Ekonomi Indonesia? – Diselenggarakan oleh Otoritas Jasa Keuangan Financial Services Authority Webinar on The Domino Effect of Trump's Tariffs: Threat or Opportunity for Indonesia's Economy? – Organized by Financial Services Authority	-	-	-	✓	✓
Training Leadership Forum for Board of Directors and Board of Commissioners – Diselenggarakan oleh Association of Certified Fraud Examiners Training Leadership Forum for Board of Directors and Board of Commissioners – Organized by Association of Certified Fraud Examiners	-	-	-	-	✓
Webinar Simposium Nasional - Sumitronomics dan Arah Ekonomi Nasional – Diselenggarakan oleh Kata Data National Symposium Webinar - Sumitronomics and the Direction of the National Economy – Organized by Kata Data	-	-	-	-	✓
Webinar The Future of Cybersecurity: Threats, Challenges, and Innovations – Diselenggarakan oleh OJK Institute Webinar The Future of Cybersecurity: Threats, Challenges, and Innovations – Organized by OJK Institute	-	-	-	-	✓
Webinar Penerapan ICoFR untuk Meningkatkan Integritas Laporan Keuangan dan Kepercayaan Publik – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia Webinar on Implementing ICoFR to Improve Financial Statements' Integrity and Public Trust – Organized by Indonesian Banking Development Institute	-	-	-	-	✓
Idea Talks Volume 9 - Digitalisasi Perbankan dari Dua Sudut Pandang – Diselenggarakan oleh OJK Institute Idea Talks Volume 9 - Banking Digitalization from Two Perspectives – Organized by OJK Institute	-	-	-	-	✓
Sharing Sessions: Navigating Crisis with Confidence: Recovery and Resolution Plan sebagai Pilar Ketahanan Bank – Diselenggarakan oleh BARA Sharing Sessions: Navigating Crisis with Confidence: Recovery and Resolution Plan as Pillars of Bank Resilience – Organized by BARA	-	-	-	-	✓
Training Pembekalan Sertifikasi Kompetensi APU, PPT, & PPSPM Jenjang 7 – Diselenggarakan oleh Forum Koordinasi dan Diskusi Kebijakan Perbankan Briefing Training on Competency Certification of AML, CTF, & CPF Level 7 – Organized by Banking Policy Coordination and Discussion Forum	-	-	-	-	✓
Webinar Sinergi Nasional Memerangi Kejahatan Finansial – Diselenggarakan oleh Kata Data Webinar on National Synergy to Combat Financial Crime – Organized by Kata Data	-	-	-	-	✓
Webinar Dinamika Geopolitik dan Ketahanan Nasional: Strategi Memperkuat Perekonomian Indonesia – Diselenggarakan oleh OJK Institute Webinar on Geopolitical Dynamics and National Resilience: Strategies to Strengthen Indonesia's Economy – Organized by OJK Institute	-	-	-	-	✓

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance				
	Achmad Friscantono	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan
Webinar Seminar Bersama Memberantas Praktik Judi Online Demi Terwujudnya Indonesia yang Lebih Baik – Diselenggarakan oleh Forum Koordinasi dan Diskusi Kebijakan Perbankan Webinar: Joint Seminar on Eradicating Online Gambling Practices for a Better Indonesia – Organized by Banking Policy Coordination and Discussion Forum	-	-	-	-	✓
Team Building: "Work Life Balance" – Diselenggarakan oleh Internal Bank Victoria Team Building: "Work life Balance" – Organized by Bank Victoria Internally	-	-	✓	-	✓
Ujian Sertifikasi Kepatuhan Jenjang 7 – Diselenggarakan oleh Lembaga Sertifikasi Profesi Perbankan Examination of Compliance Certification Level 7– Organized by Banking Profession Certification Institute	-	-	-	-	✓
Seminar: *Sustainability Action for The Future Economy (SAFE)* 2025 – Diselenggarakan oleh Kata Data Seminar: Sustainability Action for The Future Economy (SAFE) 2025 – Organized by Kata Data	-	-	-	-	✓
Webinar *"Risk Appetite and Risk Culture*: Pilar Utama dalam Penguatan Manajemen Risiko di Sektor Keuangan" – Diselenggarakan oleh Otoritas Jasa Keuangan Webinar "Risk Appetite and Risk Culture: Key Pillars in Strengthening Risk Management in Financial Sector" – Organized by Financial Services Authority	-	-	-	-	✓
Focus Group Discussion Penguatan Kebijakan Insentif *Likuiditas Makroprudensial* – Diselenggarakan oleh Bank Indonesia Focus Group Discussion on Strengthening Macroprudential Liquidity Incentive Policies – Organized by Bank Indonesia	-	-	-	-	✓
Webinar Forum Koordinasi dan Diskusi Kebijakan Perbankan "Memahami Pentingnya Integritas dalam Pengelolaan Lembaga Keuangan" – Diselenggarakan oleh Forum Koordinasi dan Diskusi Kebijakan Perbankan Webinar of Banking Policy Coordination and Discussion Forum "Understanding the Importance of Integrity in the Management of Financial Institutions" – Organized by Banking Policy Coordination and Discussion Forum	-	-	-	-	✓
Training Refreshment Sertifikasi Manajemen Risiko Jenjang 7 – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia Training Refreshment of Risk Management Certification Level 7 – Organized by Indonesian Banking Development Institute	-	-	-	-	✓
Webinar: *Environmental, Social, and Governance*: Inovasi Produk dan Layanan Keuangan Berkelanjutan Skema Hijau untuk Menangkap Peluang Pendaaan dan Investasi 7 – Diselenggarakan oleh Forum Koordinasi dan Diskusi Kebijakan Perbankan Webinar: Environmental, Social, and Governance: Innovation in Sustainable Financial Products and Services, Green Schemes to Seize Financing and Investment Opportunities – Organized by Banking Policy Coordination and Discussion Forum	-	-	-	-	✓
Simfoni Integritas: Kolaborasi, Inovasi, dan Ekspresi Cegah Korupsi – Diselenggarakan oleh Otoritas Jasa Keuangan Integrity Symphony: Collaboration, Innovation, and Expression to Prevent Corruption – Organized by Financial Services Authority	-	-	-	-	✓
Team Building: "Together We Grow, Together We Go" – Diselenggarakan oleh Internal Bank Victoria Team Building: "Together We Grow, Together We Go" – Organized by Bank Victoria Internally	-	-	-	✓	-

Program Orientasi bagi Anggota Dewan Komisaris dan Direksi yang Baru Diangkat

Sebagai bagian dari komitmen Bank Victoria dalam meningkatkan efektivitas pelaksanaan tugas dan tanggung jawab organ perusahaan, Bank memiliki kebijakan penyelenggaraan program pengenalan (*induction program*) bagi anggota Dewan Komisaris dan Direksi yang baru diangkat. Program ini bertujuan untuk memberikan pemahaman yang komprehensif mengenai kondisi, sistem, serta strategi Bank, sehingga setiap anggota baru dapat segera beradaptasi dan menjalankan perannya secara optimal.

Pelaksanaan program pengenalan dikoordinasikan oleh Sekretaris Perusahaan atau pihak lain yang menjalankan fungsi Sekretaris Perusahaan. Program ini dirancang untuk mencakup berbagai aspek penting, antara lain:
1. Penyampaian informasi yang tersedia pada situs web resmi Bank.
2. Pengenalan sistem dan prosedur yang terdapat dalam intranet Bank.
3. Kunjungan kerja ke kantor cabang, khususnya cabang utama, guna memahami operasional secara langsung.
4. Pemaparan informasi yang tercantum dalam Laporan Tahunan Bank.

Melalui rangkaian kegiatan tersebut, Bank Victoria memastikan bahwa setiap anggota Dewan Komisaris dan Direksi memiliki wawasan yang memadai mengenai tata kelola, operasional, serta arah strategis perusahaan. Dengan demikian, kehadiran anggota baru diharapkan dapat segera memberikan kontribusi yang positif dalam mendukung pencapaian tujuan jangka panjang Bank.

Pada tahun 2025, Bank tidak melaksanakan program orientasi bagi Dewan Komisaris dan Direksi baru karena tidak terdapat Dewan Komisaris dan Direksi yang baru diangkat pertama kali.

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

As part of Bank Victoria's commitment to improving the effectiveness of duty and responsibility implementation of corporate organs, the Bank has a policy of holding induction program for newly appointed members of the Board of Commissioners and Board of Directors. This program aims to provide a comprehensive understanding of the Bank's conditions, systems, and strategies, so that all new members can quickly adapt and optimally fulfill their role.

The implementation of induction program is coordinated by the Corporate Secretary or another party performing Corporate Secretary function. This program is designed to cover several important aspects, including:
1. Delivery of information available on the Bank's official website.
2. Introduction to systems and procedures set out in the Bank's intranet.
3. Working visit to branch offices, particularly main branch, to gain first-hand understanding of operations.
4. Presentation of information set out in the Bank's Annual Report.

Through this series of activities, Bank Victoria ensures that each member of the Board of Commissioners and Board of Directors has adequate insight into the company's governance, operations, and strategic direction. Thus, the presence of new members is expected to immediately make a positive contribution to supporting the achievement of the Bank's long-term goals.

In 2025, the Bank did not conduct any orientation program for new members of the Board of Commissioners and Board of Directors as there was no new appointments.

Penanganan Benturan Kepentingan Dewan Komisaris dan Direksi [G-09]

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

Bank menerapkan kebijakan dan mekanisme penanganan benturan kepentingan sebagai bagian dari penerapan GCG. Setiap anggota Dewan Komisaris dan Direksi, serta pihak terkait lainnya, wajib menjaga integritas dengan menghindari segala bentuk benturan kepentingan antara kepentingan pribadi dan kepentingan Bank dalam pelaksanaan tugas pengelolaan dan pengawasan.

Dalam rangka pencegahan dan pengelolaan benturan kepentingan, Bank mewajibkan pengungkapan secara transparan atas setiap potensi benturan kepentingan yang dapat memengaruhi objektivitas pengambilan keputusan. Anggota yang memiliki benturan kepentingan diwajibkan mengungkapkan kondisi tersebut dan menahan diri dari keterlibatan dalam proses pengambilan keputusan terkait, serta dilarang melakukan tindakan yang dapat merugikan atau mengurangi keuntungan Bank.

Pengungkapan benturan kepentingan dituangkan secara tertib dalam risalah rapat atau dokumen pembahasan terkait, yang paling sedikit memuat identitas pihak yang memiliki benturan kepentingan, pokok permasalahan, serta dasar pertimbangan pengambilan keputusan. Penetapan keputusan dilakukan oleh pihak yang berwenang sesuai dengan tingkat jabatan, dengan memastikan bahwa pihak yang terlibat benturan kepentingan tidak turut serta dalam proses pengambilan keputusan. Selain itu, Bank memastikan bahwa setiap transaksi dengan pihak yang memiliki hubungan istimewa dilaksanakan secara wajar dan tidak lebih menguntungkan dibandingkan dengan transaksi dengan pihak lain dalam kondisi yang serupa.

The Bank implements policies and mechanisms for handling conflicts of interest as part of GCG implementation. Each member of the Board of Commissioners and Board of Directors, as well as other related parties, is required to maintain integrity by avoiding any form of conflict of interest between personal interests and the Bank's interests in performing management and supervisory duties.

To prevent and manage conflicts of interest, the Bank requires transparent disclosure of any potential conflicts of interest that could affect the objectivity of decision-making. Members with a conflict of interest are required to disclose their situation and refrain from involvement in the related decision-making process, and also prohibited from taking any actions that could harm or reduce the Bank's profits.

Disclosure of conflicts of interest is documented in an orderly manner in meeting minutes or related discussion documents, which at least includes identity of the party with conflict of interest, the main issue, and the basis for decision-making considerations. Decisions are made by authorized parties according to their respective positions, ensuring that parties with conflicts of interest do not participate in the decision-making process. Furthermore, the Bank ensures that all transactions with related parties are conducted fairly and are not more advantageous than transactions with other parties under similar circumstances.

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

Sesuai dengan ketentuan yang tercantum dalam Anggaran Dasar, Bank telah menetapkan tata cara pengunduran diri bagi anggota Dewan Komisaris dan Direksi 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 (sembilan puluh) hari setelah diterimanya surat pengunduran diri.
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.
4. Jika oleh suatu sebab jabatannya anggota Direksi kosong, dan jumlah anggota Direksi menjadi kurang dari 3 (tiga) orang, maka selambat-lambatnya 90 (sembilan puluh) hari kalender setelah kekosongan itu harus diadakan RUPS untuk mengisi kekosongan tersebut dengan memperhatikan peraturan perundang-undangan yang berlaku di bidang pasar modal.

Resignation Mechanism

In accordance with the provisions of the Articles of Association, the Bank has established procedures for the resignation of members of the Board of Commissioners and Board of Directors, as outlined below:

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 (ninety) days after receipt of the resignation letter.
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.
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 (ninety) 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.

Mekanisme Pemberhentian

Selain melalui pengunduran diri secara sukarela, anggota Dewan Komisaris dan Direksi juga dapat diberhentikan dari jabatannya sewaktu-waktu sesuai dengan mekanisme yang telah ditetapkan dalam Anggaran Dasar serta peraturan perundang-undangan yang berlaku. Ketentuan tersebut diuraikan 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. Pemberhentian atau penggantian Komisaris Independen sebelum periode masa jabatannya berakhir, wajib mendapatkan persetujuan Otoritas Jasa Keuangan sebelum diputuskan dalam RUPS.
3. Dalam rangka pemberhentian atau penggantian Komisaris Independen sebelum periode masa jabatannya berakhir, Bank menyampaikan permohonan

Dismissal Mechanism

In addition to voluntary resignation, members of the Board of Commissioners and Board of Directors may also be dismissed from their positions at any time in accordance with the mechanisms established in the Articles of Association and applicable laws and regulations. These provisions are outlined as follows:

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. The dismissal or replacement of an Independent Commissioner before the term of office ends shall obtain the approval of Financial Services Authority before being resolved at the GMS.
3. To dismiss or replace an Independent Commissioner before the term of office ends, the Bank shall submit a request to the Financial Services Authority no later

kepada Otoritas Jasa Keuangan paling lama 1 (satu) bulan sebelum rencana pelaksanaan RUPS yang memuat agenda pemberhentian atau penggantian dimaksud.

4. Pemberhentian atau penggantian Komisaris Independen hanya dapat diagendakan dalam RUPS setelah memperoleh persetujuan Otoritas Jasa Keuangan. Dalam hal rencana dinilai tidak layak, Bank dilarang mengagendakannya dalam RUPS, dan apabila RUPS telah dilaksanakan sebelum persetujuan Otoritas Jasa Keuangan diterbitkan, Bank wajib menyelenggarakan RUPS kembali untuk membatalkan keputusan dimaksud.
5. Anggota Direksi dapat diberhentikan untuk sementara oleh Dewan Komisaris dengan menyebutkan alasannya.
6. Pemberhentian sementara anggota Direksi wajib disampaikan secara tertulis.
7. Dewan Komisaris harus menyelenggarakan RUPS untuk mencabut atau menguatkan keputusan pemberhentian sementara.
8. RUPS wajib diselenggarakan dalam jangka waktu paling lambat 90 (sembilan puluh) hari setelah tanggal pemberhentian sementara.
9. Jika dalam waktu yang ditentukan RUPS tidak dapat mengambil keputusan, maka pemberhentian sementara menjadi batal.
10. Anggota Direksi yang diberhentikan sementara tidak berwenang untuk menjalankan kepengurusan Bank dan mewakili Bank di dalam maupun di luar pengadilan.
11. 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 terlampauinya jangka waktu penyelenggaraan RUPS.
12. 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.
13. Pemberhentian atau penggantian Direktur Utama dan/atau Direktur yang membawahkan fungsi kepatuhan sebelum berakhirnya masa jabatan, termasuk pemberhentian sementara, wajib memperoleh persetujuan Otoritas Jasa Keuangan sebelum diputuskan dalam RUPS, dengan ketentuan bahwa pemberhentian akibat hasil penilaian kembali pihak utama dengan predikat tidak lulus dipersamakan sebagai persetujuan Otoritas Jasa Keuangan.
14. Dalam rangka pemberhentian atau penggantian Direktur Utama dan/atau Direktur yang membawahkan fungsi kepatuhan sebelum berakhirnya masa jabatan, Bank menyampaikan permohonan kepada Otoritas Jasa Keuangan paling lambat 1 (satu) bulan sebelum

than 1 (one) month prior to the planned GMS, including the agenda for such dismissal or replacement.

4. The dismissal or replacement of an Independent Commissioner may only be placed on the agenda of the GMS after obtaining Financial Services Authority's approval. In the event the plan is deemed unfeasible, the Bank is prohibited from placing it on the agenda of the GMS, and in the event the GMS has already been held before the issuance of Financial Services Authority's approval, the Bank shall hold another GMS to revoke such resolution.
5. Members of the Board of Directors may be suspended by the Board of Commissioners by stating the reasons.
6. The suspension of a member of the Board of Directors must be conveyed in writing.
7. The Board of Commissioners must hold a GMS to revoke or confirm the suspension decision.
8. The GMS must be held no later than 90 (ninety) days after the suspension date.
9. If within the specified time the GMS cannot adopt a resolution, then the suspension will be cancelled.
10. 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.
11. 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.
12. 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 accept the GMS resolutions.
13. The dismissal or replacement of the President Director and/or Director in charge of compliance functions before the term of office ends, including temporary dismissal, shall obtain Financial Services Authority's approval before being resolved at the GMS, with the provision stating that dismissal resulting from reassessment by key party with a failing grade is considered equivalent to approval by the Financial Services Authority.
14. To dismiss or replace the President Director and/or Director in charge of compliance functions before the term of office ends, the Bank shall submit a request to the Financial Services Authority no later than 1 (one) month prior to the planned GMS, along with

rencana RUPS, disertai alasan, dokumen pendukung, dan/atau profil calon pengganti untuk dilakukan penilaian kemampuan dan kepatutan.

15. Pemberhentian atau penggantian Direktur Utama dan/atau Direktur yang membawahkan fungsi kepatuhan hanya dapat diagendakan dalam RUPS setelah memperoleh persetujuan Otoritas Jasa Keuangan. Dalam hal rencana dinilai tidak layak Bank dilarang mengagendakannya, dan apabila RUPS telah dilaksanakan sebelum persetujuan Otoritas Jasa Keuangan diterbitkan, Bank wajib menyelenggarakan RUPS kembali untuk membatalkan keputusan dimaksud.
16. Pengunduran diri Direksi yang mengakibatkan jumlah anggota Direksi kurang dari 3 (tiga) orang dinyatakan sah setelah ditetapkan dalam RUPS, dilakukan pengangkatan Direksi pengganti, dan memperoleh persetujuan Otoritas Jasa Keuangan, dengan ketentuan bahwa pemenuhan formasi Direksi dapat dilakukan secara bertahap berdasarkan persetujuan Otoritas Jasa Keuangan guna menjaga kelangsungan operasional Bank.

the reasons, supporting documents, and/or profile of the replacement candidate for a fit and proper assessment.

15. The dismissal or replacement of the President Director and/or Director in charge of compliance functions may only be placed on the agenda of the GMS after obtaining Financial Services Authority's approval. In the event the plan is deemed unfeasible, the Bank is prohibited from placing it on the agenda, and in the event the GMS has already been held before the issuance of Financial Services Authority's approval, the Bank shall hold another GMS to revoke such resolution.
16. Resignation of a Director resulting in the number of Board of Directors being less than 3 (three) members is deemed valid after being determined at the GMS, appointing a replacement Director, and obtaining approval of the Financial Services Authority, with the provision that the Board of Directors' formation can be fulfilled gradually based on Financial Services Authority's approval to maintain the continuity of the Bank's operations.

Mekanisme Direktur Pengganti

Bank menetapkan mekanisme penunjukan Direktur Pengganti (pelaksana tugas/plt) untuk setiap pembidangan Direksi guna menjamin kelangsungan pengelolaan Bank sesuai dengan ketentuan peraturan perundang-undangan. Direktur Pengganti ditetapkan dari pihak internal Bank dengan mempertimbangkan fungsi, kepentingan, serta potensi benturan kepentingan dalam proses pengambilan keputusan, dan pelaksanaan tugasnya dilakukan dalam kerangka sistem pengendalian internal yang mengacu pada prinsip *three lines of defence*.

Dalam kondisi tertentu sesuai dengan ketentuan peraturan perundang-undangan, Dewan Komisaris dapat menjalankan fungsi sebagai Direktur Pengganti dengan tetap berpedoman pada penerapan GCG, termasuk kewajiban deklarasi benturan kepentingan. Penunjukan Direktur Pengganti tidak dapat berasal dari pihak di luar Bank maupun dari pihak yang memiliki kewenangan di bawah Direksi.

Masa penugasan Direktur Pengganti ditetapkan paling lama 6 (enam) bulan dan dapat diperpanjang berdasarkan kebutuhan Bank dengan persetujuan Otoritas Jasa Keuangan, melalui penyampaian permohonan yang memuat alasan perpanjangan, rencana pemenuhan jabatan Direktur definitif, serta informasi calon Direktur Pengganti apabila telah tersedia.

Mechanism of Substitute Director

The Bank has established a mechanism for appointing the Substitute (acting) Board of Directors for each Director's position to ensure the continuity of the Bank's management in accordance with the laws and regulations. A Substitute Director is appointed from the Bank's internal party, by considering function, interest, and potential conflict of interest in decision-making process, and its duty is carried out within the framework of internal control system that adheres to the three lines of defense principle.

Under certain circumstances, in accordance with the laws and regulations, the Board of Commissioners may carry out its function as Substitute Director while adhering to GCG implementation, including the mandatory declaration of conflicts of interest. A Substitute Director cannot be appointed from outside the Bank or from parties with authority subordinate to the Board of Directors.

The term of office of a Substitute Director is set for a maximum of 6 (six) months and may be extended based on the Bank's needs with Financial Services Authority's approval, through the submission of a request containing reasons for extension, plan for filling the permanent Director position, and information on the Substitute Director candidate, if available.

Keberagaman Manajemen dan Independensi [G-01]

Management Diversity and Independence

Dalam rangka memperkuat praktik GCG dan mendukung keberlanjutan usaha, Bank Victoria menempatkan keberagaman dan independensi sebagai prinsip penting dalam struktur manajemen. Keberagaman tercermin melalui komposisi gender di Dewan Komisaris dan Direksi, sedangkan independensi diwujudkan melalui kehadiran anggota yang tidak memiliki hubungan kepentingan dengan Pemegang Saham, manajemen, maupun perusahaan. Kehadiran pihak independen ini berperan menjaga objektivitas serta memastikan fungsi pengawasan dijalankan secara adil dan transparan.

Rincian mengenai jumlah anggota Dewan Komisaris dan Direksi, termasuk distribusi gender serta proporsi anggota independen pada tahun 2025, disajikan dalam tabel berikut:

To strengthen GCG practices and support business sustainability, Bank Victoria prioritizes diversity and independence as key principles in its management structure. Diversity is reflected in gender composition of the Board of Commissioners and Board of Directors, while independence is demonstrated through the presence of members with no interests related to Shareholders, management, or the company. The presence of these independent parties plays a role in maintaining objectivity and ensuring that supervisory function is carried out in a fair and transparent manner.

Details on the number of members of the Board of Commissioners and Board of Directors, including gender distribution and proportion of independent members in 2025, are presented in the following table:

Tipe Manajemen Perusahaan Company Management Type	Pria Male	Wanita Female	Jumlah Pihak Independen Total Independent Parties
Dewan Komisaris Board of Commissioners	3	-	3
Direksi Board of Directors	4	1	4

Kebijakan Pemisahan Fungsi Komisaris Utama dan Direktur Utama [G-03]

Policy on Separation of Functions of President Commissioner and President Director

Dalam upaya menjaga prinsip GCG serta mendukung keberlanjutan usaha, Bank Victoria menegaskan pemisahan peran yang jelas antara Dewan Komisaris dan Direksi. Dewan Komisaris dipimpin oleh Komisaris Utama yang berfokus pada fungsi pengawasan dan pemberian arahan strategis, sedangkan Direksi dipimpin oleh Direktur Utama yang bertanggung jawab atas pengelolaan operasional sehari-hari, pencapaian kinerja, serta pelaksanaan strategi bisnis. Ketentuan mengenai pemisahan peran tersebut tertuang secara formal dalam *BOC Charter* No. 001/SK-KOM/12/23 tanggal 6 Desember 2023 tentang Pedoman dan Tata Tertib Kerja *BOC Charter* dan *BOD Charter* No. 006A/SK-DIR/12/23 tanggal

In an effort to uphold GCG principles and support business sustainability, Bank Victoria emphasizes a clear separation of roles between the Board of Commissioners and Board of Directors. The Board of Commissioners is led by President Commissioner, who focuses on supervision and providing strategic direction, while the Board of Directors is led by President Director, who is responsible for day-to-day operational management, performance achievement, and business strategy implementation. Provisions on separation of roles are formally stated in BOC Charter No. 001/SK-KOM/12/23 dated 6 December 2023 on the BOC Charter and BOD Charter No. 006A/SK-DIR/12/23 dated 6 December 2023 on the Board of Directors Charter.

6 Desember 2023 tentang Pedoman dan Tata Tertib Kerja Direksi *(Board of Directors Charter).* Saat ini, Dewan Komisaris dipimpin oleh Zaenal Abidin, Ph.D, selaku Komisaris Utama, sementara posisi Direktur Utama dijabat oleh Achmad Friscantono.

Currently, the Board of Commissioners is chaired by Zaenal Abidin, Ph.D, as President Commissioner, while the position of President Director is held by Achmad Friscantono.

Kebijakan Remunerasi dan Nominasi Dewan Komisaris dan Direksi

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

Kebijakan Nominasi

Bank Victoria menerapkan kebijakan nominasi bagi Dewan Komisaris dan Direksi dengan mengutamakan prinsip keterbukaan, profesionalisme, serta kepatuhan terhadap GCG. Proses nominasi dirancang untuk memastikan setiap calon memiliki integritas dan kompetensi yang sejalan dengan kebutuhan serta arah strategis perusahaan. Dalam hal ini, Komite Remunerasi dan Nominasi berperan penting dengan menyusun mekanisme nominasi yang menjadi acuan bagi Dewan Komisaris dan RUPS dalam menetapkan calon maupun menentukan paket remunerasi yang tepat bagi anggota Dewan Komisaris dan Direksi.

Proses Seleksi Calon Anggota Dewan Komisaris dan Direksi

Bank Victoria menerapkan proses seleksi calon anggota Dewan Komisaris dan Direksi secara terstruktur untuk memastikan terpilihnya individu yang tepat sesuai kebutuhan perusahaan. Tahapan seleksi dimulai dengan penyaringan kandidat oleh Komite Remunerasi dan Nominasi berdasarkan kriteria yang telah ditetapkan. Selanjutnya, rekomendasi dari Komite Remunerasi dan Nominasi disampaikan kepada Dewan Komisaris untuk kemudian diajukan kepada Pemegang Saham. Mekanisme ini dilakukan secara berkala menjelang berakhirnya masa jabatan, saat terdapat kebutuhan tertentu, maupun ketika terjadi kekosongan posisi dalam struktur Direksi.

Nomination Policy

Bank Victoria implements nomination policy for the Board of Commissioners and Board of Directors that prioritizes the principles of transparency, professionalism, and compliance with GCG. The nomination process is designed to ensure that every candidate has integrity and competency that are in line with the company's needs and strategic direction. In this regard, Remuneration and Nomination Committee plays a crucial role by preparing nomination mechanism that serves as a reference for the Board of Commissioners and the GMS in appointing candidates and determining appropriate remuneration packages for members of the Board of Commissioners and Board of Directors.

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

Bank Victoria implements a structured selection process of candidates for the Board of Commissioners and Board of Directors to ensure the selection of the right individuals to meet the company's needs. The selection process is started with Remuneration and Nomination Committee screening candidates based on established criteria. Then, recommendations from Remuneration and Nomination Committee are submitted to the Board of Commissioners, who then submit them to the Shareholders. This mechanism is carried out periodically near the end of the term of office, when specific needs arise, or when a vacant position within the Board of Directors arises.

Kriteria Khusus Pemilihan Dewan Komisaris dan Direksi [G-06]

Mengacu pada ketentuan yang diatur dalam *BOC Charter* dan *BOD Charter*, setiap calon anggota Dewan Komisaris maupun Direksi diwajibkan memenuhi sejumlah persyaratan berikut:

1. Persyaratan Formal
   a. Cakap melakukan perbuatan hukum.
   b. Dalam 5 (lima) tahun sebelum pengangkatan dan selama menjabat:
      1) Tidak pernah dinyatakan pailit.
      2) Tidak pernah menjadi anggota Dewan Komisaris 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.
      4) Tidak pernah menjadi anggota Dewan Komisaris dan/atau Direksi yang selama menjabat:
         - 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.
         - Pernah menyebabkan Bank yang memperoleh izin, persetujuan, atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan Laporan Tahunan dan/atau Laporan Keuangan kepada Otoritas Jasa Keuangan.
2. Persyaratan Material
   a. Mempunyai akhlak, moral, dan integritas yang baik.
   b. Memiliki komitmen untuk mematuhi peraturan perundang-undangan.
   c. Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan untuk menjalankan tugasnya.
3. Persyaratan Lainnya
   a. Anggota Dewan Komisaris tidak diperkenankan merangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris, atau Pejabat Eksekutif pada lembaga keuangan (bank atau non-bank) dan pada lebih dari 1 (satu) perusahaan bukan lembaga keuangan baik yang berkedudukan di dalam negeri atau luar negeri.
   b. Anggota Dewan Komisaris tidak termasuk rangkap jabatan apabila menjabat sebagai Direksi, anggota Dewan Komisaris, atau Pejabat Eksekutif

Specific Criteria for the Selection of Board of Commissioners and Board of Directors [G-06]

In accordance with the provisions stipulated in BOC Charter and BOD Charter, every candidate for the Board of Commissioners and Board of Directors is required to meet the following requirements:

1. Formal Requirements
   a. Capable in performing legal actions.
   b. Within 5 (five) years before appointment and during the term of office:
      1) Never been declared bankrupt.
      2) Never become a member of Board of Commissioners 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.
      4) Never been a member of Board of Commissioners and/or Board of Directors who during the term of office:
         - Has ever not convening an Annual GMS.
         - Has ever had his/her accountability as the member of Board of Commissioners 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.
         - Has ever caused a Bank that obtains permit, approval, or registration from the Financial Services Authority not to fulfill its obligation to submit its Annual Report and/or Financial Statements to the Financial Services Authority.
2. Material Requirements
   a. Have good character, morals, and integrity.
   b. Has a commitment to comply with the laws and regulations.
   c. Has knowledge and/or expertise in the field required to perform the duties.
3. Other Requirements
   a. Members of the Board of Commissioners are not allowed to concurrently hold position as a member of Board of Directors, member of Board of Commissioners, or Executive Officer in other financial institutions (bank or non-bank) and in more than 1 (one) non-financial institutions, either in Indonesia or overseas.
   b. Members of the Board of Commissioners do not hold concurrent position if holding a position as the Board of Directors, members

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.
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.

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.
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.

Kriteria Pemilihan Ulang Dewan Komisaris dan Direksi [G-06]

Dalam rangka menjaga kesinambungan tata kelola dan efektivitas manajemen, Bank Victoria menempatkan proses pemilihan kembali anggota Dewan Komisaris dan Direksi sebagai bagian penting dari siklus kepemimpinan perusahaan. Pemilihan ulang dilakukan dengan berpedoman pada kriteria yang jelas, objektif, dan sesuai kebutuhan strategis, sehingga dapat menjamin terpilihnya pemimpin yang profesional, berintegritas, serta mampu mendukung pertumbuhan jangka panjang Bank. Seluruh tahapan proses dilaksanakan berdasarkan keputusan RUPS dan sejalan dengan prinsip-prinsip GCG.

Criteria for Re-Election of Board of Commissioners and Board of Directors [G-06]

To maintain governance continuity and management effectiveness, Bank Victoria places re-election process for members of the Board of Commissioners and Board of Directors as a critical part of the company's leadership cycle. Re-election is conducted based on clear, objective criteria in line with strategic needs, ensuring the selection of leaders with professionalism, integrity, and ability to support the Bank's long-term growth. All stages of the process are implemented based on GMS resolution in line with GCG principles.

Kebijakan Remunerasi Dewan Komisaris dan Direksi

Kebijakan remunerasi Dewan Komisaris dan Direksi merupakan upaya Bank dalam memberikan imbalan kepada Dewan Komisaris dan Direksi yang disesuaikan dengan kemampuan Bank dengan tetap memperhatikan ketahanan dan kelangsungan usaha Bank. Pemberian remunerasi kepada Dewan Komisaris dan Direksi Bank mengacu pada Keputusan Dewan Komisaris No.001/SK-KOM/01/24 tanggal 5 Januari 2024 tentang Pedoman dan Tata Tertib Komite Remunerasi dan Nominasi PT Bank Victoria International Tbk, yang disusun berdasarkan Peraturan Otoritas Jasa Keuangan No. 45/POJK.03/2015 dan Surat Edaran Otoritas Jasa Keuangan No. 40/SEOJK.03/2016 tentang Penerapan Kelola dalam Pemberian Remunerasi bagi Bank Umum.

Remuneration Policy of the Board of Commissioners and Board of Directors

The remuneration policy for the Board of Commissioners and Board of Directors is the Bank's effort to provide compensation to the Board of Commissioners and Board of Directors that is adjusted to the Bank's capabilities, while still considering the Bank's business resilience and continuity. The provision of remuneration to the Bank's Board of Commissioners and Board of Directors refers to Board of Commissioners' Decision No. 001/SK-KOM/01/24 dated 5 January 2024 on the Guidelines and Procedures of Remuneration and Nomination Committee of PT Bank Victoria International Tbk, prepared based on 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.

Prosedur Penetapan Remunerasi Dewan Komisaris dan Direksi

Bank Victoria menerapkan prosedur penetapan remunerasi bagi Dewan Komisaris dan Direksi melalui mekanisme yang transparan, terukur, dan sesuai dengan prinsip GCG yang diuraikan sebagai berikut:

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

Bank Victoria implements remuneration determination procedure for the Board of Commissioners and Board of Directors through a transparent and measurable mechanism in line with GCG principles, as outlined below:

1. Komite Remunerasi dan Nominasi melakukan kajian terhadap kinerja dan memberikan usulan remunerasi bagi Direksi dan Dewan Komisaris dengan memperhatikan beberapa indikator tertentu.
2. Komite Remunerasi dan Nominasi menyampaikan rekomendasi usulan jenis dan jumlah remunerasi kepada Dewan Komisaris.
3. Dewan Komisaris mengusulkan penetapan remunerasi kepada RUPS.
4. RUPS menetapkan besaran remunerasi bagi Dewan Komisaris dan Direksi.

Jenis dan Indikator Penetapan Remunerasi Dewan Komisaris dan Direksi

Penetapan remunerasi bagi Dewan Komisaris dan Direksi Bank mempertimbangkan beberapa faktor, seperti skala dan kompleksitas usaha, kelompok pembanding (*peer group*), tingkat inflasi, kondisi serta kemampuan keuangan Bank, dan selalu sesuai dengan peraturan yang berlaku. Remunerasi variabel dirancang khusus untuk mendorong pengambilan risiko yang bijaksana dengan memperhatikan risiko utama yang memengaruhi kegiatan usaha.

Berdasarkan regulasi dan kebijakan internal, remunerasi Dewan Komisaris dan Direksi mencakup 2 (dua) jenis, yaitu:

1. Remunerasi yang Bersifat Tetap
   Diberikan dalam bentuk tunai dan/atau non-tunai, tidak terkait dengan kinerja atau risiko, dan mencakup gaji pokok, fasilitas, tunjangan perumahan, kesehatan, pendidikan, tunjangan hari raya, serta program pensiun.
2. Remunerasi yang Bersifat Variabel
   Remunerasi yang terkait dengan kinerja dan risiko, diberikan dalam bentuk tunai maupun saham atau instrumen berbasis saham yang diterbitkan oleh Bank. Bentuknya dapat berupa bonus atau insentif lainnya yang setara.

Pelaksanaan Kaji Ulang dan Independensi Penerapan Kebijakan Remunerasi

Bank Victoria memastikan objektivitas dan independensi dalam sistem remunerasi melalui mekanisme evaluasi yang terstruktur. Seluruh proses, termasuk penetapan remunerasi bagi karyawan pada unit kontrol, berada dalam pengawasan Komite Remunerasi dan Nominasi. Selain itu, kebijakan remunerasi ditinjau secara berkala dengan memperhatikan beragam aspek, seperti pencapaian kinerja, profil risiko, perbandingan dengan praktik industri sejenis, serta keselarasan dengan arah strategi jangka panjang perusahaan. Penyesuaian juga dilakukan untuk memastikan kepatuhan terhadap ketentuan regulator dan mendukung keberlanjutan kinerja perusahaan di masa depan.

1. The Remuneration and Nomination Committee reviews the performance and provides a remuneration proposal for the Board of Directors and Board of Commissioners by considering several specific indicators.
2. The Remuneration and Nomination Committee submits a recommendation on the type and amount of remuneration to the Board of Commissioners.
3. The Board of Commissioners proposes the determination of remuneration to the GMS.
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

The determination of remuneration for the Bank's Board of Commissioners and Board of Directors considers several factors, such as business scale and complexity, comparison group (peer group), inflation rate, condition and financial capacity of the Bank, and is always in accordance with the applicable regulations. Variable remuneration is specifically designed to encourage prudent risk taking by considering main risks that affect business activities.

Based on regulations and internal policies, the remuneration for the Board of Commissioners and Board of Directors includes 2 (two) types, namely:

1. Fixed Remuneration
   Given in cash and/or non-cash, not related to performance or risk, and includes basic salary, facilities, housing allowances, health, education, holiday allowance, and pension program.
2. Variable Remuneration
   Remuneration related to performance and risk, given in cash or shares or share-based instruments issued by the Bank. It can be in form of bonus or other equivalent incentives.

Review and Independence of Remuneration Policy Implementation

Bank Victoria ensures objectivity and independence in its remuneration system through a structured evaluation mechanism. The entire process, including the determination of remuneration for employees in control unit, is under the supervision of Remuneration and Nomination Committee. Furthermore, remuneration policy is periodically reviewed, by considering various aspects, such as performance achievement, risk profile, comparison with similar industry practices, and alignment with the company's long-term strategic direction. Adjustments are also made to ensure compliance with regulatory requirements and support the company's sustainable performance in the future.

Penetapan *Material Risk Takers*

Penetapan *Material Risk Takers* (MRT) dilakukan berdasarkan 2 (dua) pendekatan berikut:

1. Metode kualitatif, yaitu MRT ditetapkan berdasarkan tanggung jawab yang memengaruhi profil risiko utama Bank, dengan evaluasi profil risiko dilakukan setiap tahun.
2. Metode kuantitatif, yaitu penetapan MRT dilakukan melalui analisis perbandingan remunerasi variabel antara MRT dan karyawan non-MRT dengan mempertimbangkan kinerja serta tingkat risiko dari posisi tersebut.

Oleh karena itu, Dewan Komisaris, Direksi, atau karyawan yang menerima remunerasi variabel dalam jumlah besar dikategorikan sebagai MRT.

Penangguhan atau Penarikan Kembali Remunerasi

Remunerasi untuk Dewan Komisaris dan Direksi dapat ditangguhkan atau ditarik kembali apabila Bank mengalami kerugian yang menyebabkan remunerasi tidak dapat diberikan secara penuh atau hanya dalam bentuk variabel dengan jumlah yang kecil. Ketentuan ini sesuai dengan regulasi pemberian remunerasi bagi Bank Umum. Selain itu, Bank wajib menangguhkan atau menarik kembali remunerasi variabel bagi Dewan Komisaris dan Direksi (*malus* atau *clawback*) jika terjadi kerugian akibat kondisi yang merugikan keuangan Bank, seperti kasus *fraud* oleh individu yang dikategorikan sebagai MRT, atau situasi lainnya. Penangguhan ini berlangsung minimal 3 (tiga) tahun dan dapat diperpanjang sesuai dengan periode risiko yang dihadapi. Dalam kondisi ini, Dewan Komisaris dan Direksi tidak diperbolehkan melakukan lindung nilai atas remunerasi variabel yang ditangguhkan.

Kaitan Remunerasi dengan Risiko dan Kinerja

Remunerasi variabel untuk Dewan Komisaris dan Direksi ditetapkan dengan mempertimbangkan risiko utama yang dihadapi oleh Bank, dengan evaluasi berdasarkan kriteria dan dampak risiko tersebut. Jika risiko utama terjadi, remunerasi bagi Dewan Komisaris dan Direksi sebagai MRT akan terpengaruh. Penilaian kinerja dilakukan baik secara individu maupun kolegial, dan hasil penilaian ini menjadi dasar bagi Komite Remunerasi dan Nominasi untuk memberikan rekomendasi kepada Dewan Komisaris terkait besaran remunerasi yang tepat. Rekomendasi ini kemudian diajukan kepada RUPS untuk penetapan akhir remunerasi.

Establishing Material Risk Takers

The establishment of Material Risk Takers (MRT) is carried out based on the following 2 (two) approaches:

1. Qualitative method, in which MRT is determined based on responsibility that affects the Bank's main risk profile, with risk profile evaluation carried out annually.
2. Quantitative method, in which the determination of MRT is carried out through a comparative analysis of variable remuneration between MRT and non-MRT employees by considering their performance and positional risk level.

Therefore, the Board of Commissioners, Board of Directors, or employees receiving large amounts of variable remuneration are categorized as the MRT.

Remuneration Suspension or Clawback

Remuneration for the Board of Commissioners and Board of Directors may be suspended or clawback if the Bank suffers a loss which causes remuneration unable to be given in full or only in form of variable with a small amount. This provision is in accordance with the regulation on providing remuneration for Commercial Banks. In addition, the Bank must suspend or withdraw variable remuneration for the Board of Commissioners and Board of Directors (malus or clawback) if a loss occurs due to conditions that cause losses to the Bank's finances, such as cases of fraud by individuals categorized as MRT, or other situations. This suspension lasts for a minimum of 3 (three) years and can be extended according to the risk period faced. In this condition, the Board of Commissioners and Board of Directors are not allowed to hedge on the deferred variable remuneration.

Connection of Remuneration with Risk and Performance

Variable remuneration for the Board of Commissioners and Board of Directors is determined by considering the main risks faced by the Bank, with an evaluation based on the criteria and impact of the risk. If the main risk occurs, the remuneration for the Board of Commissioners and Board of Directors as the MRT will be affected. Performance assessments are carried out both individually and collegially, and the results of this assessment serve the basis for the Remuneration and Nomination Committee to provide recommendations to the Board of Commissioners regarding the appropriate amount of remuneration. This recommendation is then submitted to the GMS for final determination of remuneration.

Konsultan terkait Kebijakan Remunerasi

Dalam penyusunan kebijakan remunerasi, Bank Victoria sepenuhnya mengandalkan mekanisme internal tanpa melibatkan pihak konsultan eksternal. Hal ini mencerminkan komitmen Bank untuk menjaga independensi, objektivitas, serta kesesuaian kebijakan dengan kebutuhan dan strategi perusahaan.

Consultant regarding Remuneration Policy

In developing remuneration policy, Bank Victoria relies entirely on internal mechanisms without involving external consultants. This matter reflects the Bank's commitment to maintaining independence, objectivity, and policy alignment with the company's needs and strategy.

Struktur dan Besaran Remunerasi Dewan Komisaris dan Direksi

Struktur remunerasi bagi Dewan Komisaris dan Direksi Bank Victoria disusun dengan mempertimbangkan keseimbangan antara kepastian pendapatan dan penghargaan atas kinerja. Komponen remunerasi terdiri dari remunerasi tetap, berupa honorarium serta berbagai fasilitas, seperti asuransi kesehatan, kendaraan dinas, BPJS Ketenagakerjaan, dan tunjangan hari raya. Selain itu, diberikan pula remunerasi variabel yang mencakup tantiem, gratifikasi, maupun saham, dengan skema pembayaran dalam bentuk tunai maupun non-tunai, termasuk natura (rumah, kendaraan dinas, atau aset lainnya yang bisa dimiliki atau tidak). Besaran remunerasi variabel ditetapkan berdasarkan capaian kinerja, kontribusi, dan tanggung jawab masing-masing anggota.

Untuk tahun buku 2025, detail mengenai paket remunerasi beserta fasilitas yang diterima Dewan Komisaris dan Direksi disajikan pada tabel berikut:

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

The remuneration structure for the Board of Commissioners and Board of Directors of Bank Victoria is designed with a balance between income certainty and performance rewards. Remuneration components consist of fixed remuneration in form of honorarium and various benefits, such as health insurance, official vehicles, BPJS Employment, and holiday allowance. Furthermore, variable remuneration is provided, including bonus, gratification, and shares, with payment scheme in cash or non-cash, including in-kind benefits (house, official vehicle, or other assets that may or may not be owned). The amount of variable remuneration is determined based on performance achievements, contributions, and responsibilities of each member.

For the 2025 fiscal year, details of remuneration packages and benefits received by the Board of Commissioners and Board of Directors were presented in the following table:

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	Total (Rp)	Orang People	Total (Rp)
Remunerasi Bersifat Tetap (Gaji, THR, dan TAT) Fixed Remuneration (Salary, THR, and TAT Allowance)	3	3,337,808,457	5	17,011,181,236
Remunerasi Bersifat Variabel (Bonus) Variable Remuneration (Bonus)	3	436,203771	5	2,196,696,460
Total		**3,774,012,228**		**19,207,877,696**

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	Total (Rp)	Orang People	Total (Rp)
Remunerasi dalam Bentuk Tunai Remuneration in the Form of Cash	3	3,774,012,228	5	19,207,877,696
Remunerasi dalam Bentuk Natura Remuneration in the Form of Natura	-	-	-	-

Bentuk Remunerasi Form of Remuneration	Dewan Komisaris Board of Commissioners		Direksi Board of Directors	
	Orang People	Total (Rp)	Orang People	Total (Rp)
Remunerasi dalam Bentuk Saham Remuneration in the Form of Shares	-	-	-	-
Total		3,774,012,228		19,207,877,696

Remunerasi Dewan Komisaris dan Direksi berdasarkan Rentang Nilai
Remuneration for the Board of Commissioners and Board of Directors by Value Range

Total Remunerasi dalam Setahun Total Remuneration in a Year	Total Dewan Komisaris Total Board of Commissioners (Orang / People)	Total Direksi Total Board of Directors (Orang / People)
Di atas Rp2 miliar Above Rp2 billion	-	5
Di atas Rp1 miliar-Rp2 miliar Above Rp1 billion-Rp2 billion	3	-
Di atas Rp500 juta-Rp1 miliar Above Rp500 million-Rp1 billion	-	-
Di bawah Rp500 juta Below Rp500 million	-	-

Remunerasi Dewan Komisaris dan Direksi berdasarkan Rata-Rata Total
Remuneration for the Board of Commissioners and Board of Directors by Total Average

Uraian Description	Total Individu Total Individual	Rata-Rata Remunerasi per Orang Average Remuneration per Person
Dewan Komisaris Board of Commissioners	3	Rp85 juta
Direksi Board of Directors	5	Rp255 juta

Remunerasi Dewan Komisaris dan Direksi berdasarkan Jabatan
Remuneration for the Board of Commissioners and Board of Directors by Position

Uraian Description	Gaji Pokok Basic Salary (Rp)	Bonus (Rp)	Tunjangan Allowances (Rp)	Total Remunerasi Total Remuneration (Rp)
Dewan Komisaris Board of Commissioners	2,814,558,768	436,203,771	523,249,689	3,774,012,228
Direksi Board of Directors	14,618,148,396	2,196,696,460	2,393,032,840	19,207,877,696

Remunerasi yang Ditangguhkan atau Ditarik Kembali

Pada tahun 2025, seluruh remunerasi yang diberikan kepada Dewan Komisaris dan Direksi telah dibayarkan secara penuh sesuai ketentuan yang berlaku. Tidak terdapat penundaan maupun penarikan kembali atas remunerasi yang telah ditetapkan.

Suspended or Clawback Remuneration

In 2025, all remuneration provided to the Board of Commissioners and Board of Directors was paid in full in accordance with applicable regulations. There were no delays or withdrawals of the stipulated remuneration.

Pengungkapan Bonus Kinerja, Bonus Non-Kinerja, dan Opsi Saham

Sepanjang tahun 2025, Bank tidak memberikan bonus berbasis kinerja, bonus non-kinerja, maupun program opsi saham kepada Dewan Komisaris dan Direksi. Seluruh kompensasi yang diterima terbatas pada komponen remunerasi yang telah ditetapkan sesuai kebijakan Bank.

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

Throughout 2025, the Bank did not provide performance-based bonus, non-performance bonus, or stock option program to the Board of Commissioners and Board of Directors. All compensation received was limited to remuneration components determined in accordance with the Bank's policy.

Permasalahan yang Timbul sebagai Dampak Kebijakan Remunerasi

Pada tahun 2025, tidak terdapat permasalahan yang timbul sebagai dampak kebijakan remunerasi yang diterapkan oleh Bank.

Issues Arising from the Impact of Remuneration Policy

In 2025, there were no issues arising from the remuneration policy implemented by the Bank.

Rasio Gaji Tertinggi dan Terendah

Bank Victoria senantiasa mengedepankan keterbukaan dalam penyusunan struktur penggajian di seluruh level organisasi. Penetapan rasio antara gaji tertinggi dan terendah dilakukan dengan memperhatikan asas keadilan, kontribusi kinerja, serta lingkup tanggung jawab masing-masing jabatan. Untuk tahun 2025, rasio penggajian tersebut disajikan sebagai berikut:

Ratio of Highest and Lowest Salary

Bank Victoria consistently prioritizes transparency in preparing salary structure at all levels of the organization. The ratio between the highest and lowest salary is determined by considering the principles of fairness, performance contribution, and scope of responsibility of each position. For 2025, the salary ratio was presented as follows:

Uraian	Rasio Ratio	Description
Gaji Tertinggi dan Terendah Dewan Komisaris	1:1.2	Board of Commissioners' Highest and Lowest Salary
Gaji Tertinggi dan Terendah Direksi	1:1.59	Board of Directors' Highest and Lowest Salary
Gaji Tertinggi dan Terendah Karyawan	1:17	Employees' Highest and Lowest Salary

Komite di Bawah Dewan Komisaris
Board of Commissioners' Subordinate Committees

Komite Pemantau Risiko

Komite Pemantau Risiko dibentuk oleh Dewan Komisaris untuk mendukung fungsi pengawasan dan memberi arahan kepada Direksi. Komite Pemantau Risiko memastikan kerangka manajemen risiko Bank berjalan efektif, menjaga aktivitas bisnis dalam batas risiko yang wajar, sekaligus mendorong pertumbuhan yang terkendali dan berkelanjutan.

Pedoman Komite Pemantau Risiko

Komite Pemantau Risiko menjalankan tugasnya berdasarkan Pedoman Kerja Komite Pemantau Risiko yang diperbarui pada 18 Juni 2025 melalui Keputusan Komisaris No. 002/SK-KOM/06/25. Pedoman kerja ini menjadi acuan bagi efektivitas fungsi pengawasan serta penguatan tata kelola dan manajemen risiko Bank.

Tugas dan Tanggung Jawab Komite Pemantau Risiko

Tugas dan tanggung jawab Komite Pemantau Risiko meliputi:

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.
5. Melakukan penelaahan atas informasi risiko dan manajemen risiko Bank dalam laporan-laporan yang akan dipublikasikan.

Risk Monitoring Committee

Risk Monitoring Committee is established by the Board of Commissioners to support the supervisory function and provide direction to the Board of Directors. Risk Monitoring Committee ensures that the Bank's risk management framework is effective and maintains business activities within reasonable risk limits while promoting controlled and sustainable growth.

Risk Monitoring Committee Charter

The Risk Monitoring Committee carries out its duties based on Risk Monitoring Committee Work Guidelines, updated on 18 June 2025 through the Board of Commissioners' Decision No. 002/SK-KOM/06/25. These work guidelines serve as a reference for ensuring the effectiveness of oversight function and strengthening the Bank's governance and risk management.

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.
5. Reviewing the Bank's risk information and Bank risk management in reports to be published.

Persyaratan Komite Pemantau Risiko

Keanggotaan Komite Pemantau Risiko paling sedikit terdiri dari:
1. 1 (satu) orang Komisaris Independen yang merangkap sebagai ketua.
2. 1 (satu) orang pihak independen yang memiliki keahlian di bidang manajemen risiko.
3. 1 (satu) orang pihak independen yang memiliki keahlian di bidang keuangan.

Anggota Komite Pemantau Risiko yang berasal dari pihak independen dinilai memiliki keahlian di bidang manajemen risiko dalam hal memenuhi kriteria:
1. Memiliki sertifikat kompetensi di bidang manajemen risiko yang diterbitkan oleh lembaga domestik maupun lembaga internasional yang diakui sebagaimana yang berlaku bagi Direksi.
2. Memiliki pengalaman kerja paling sedikit 2 (dua) tahun di bidang manajemen risiko.

Anggota Komite Pemantau Risiko yang berasal dari pihak independen dinilai memiliki keahlian di bidang keuangan dalam hal memenuhi kriteria:
1. Memiliki sertifikat kompetensi di bidang, antara lain akuntan publik, akuntan, treasuri, dan *corporate finance* yang diterbitkan oleh lembaga domestik maupun lembaga internasional yang diakui.
2. Memiliki pengalaman kerja paling sedikit 5 (lima) tahun di bidang ekonomi, bidang keuangan, dan/atau bidang perbankan.

Komposisi dan Masa Jabatan Komite Pemantau Risiko

Komite Pemantau Risiko dibentuk sekurang-kurangnya terdiri dari 3 (tiga) orang anggota, yaitu seorang ketua yang merangkap Komisaris Independen serta 2 (dua) anggota lainnya dari pihak independen. Masa jabatan anggota Komite Pemantau Risiko tidak melebihi masa jabatan Dewan Komisaris sesuai Anggaran Dasar, dan dapat diperpanjang untuk 1 (satu) periode berikutnya.

Per 31 Desember 2025, komposisi Komite Pemantau Risiko Bank yang diangkat berdasarkan Surat Keputusan Direksi No. 003/SK-DIR/08/25 tanggal 1 Agustus 2025 tentang Susunan Anggota Komite Pemantau Risiko, untuk masa jabatan 2025-sekarang sebagai berikut:

Requirements for the Risk Monitoring Committee

The composition of Risk Monitoring Committee shall consist of at least:
1. 1 (one) Independent Commissioner concurrently as chairman.
2. 1 (one) independent party with expertise in risk management.
3. 1 (one) independent party with expertise in finance.

Member of Risk Monitoring Committee from independent party is deemed to have expertise in risk management, as defined by the following criteria:
1. Has competency certificate in risk management issued by a recognized domestic or international institution, as applicable to the Board of Directors.
2. Has at least 2 (two) years of work experience in risk management.

Member of Risk Monitoring Committee from independent party is deemed to have expertise in finance, as defined by the following criteria:
1. Has competency certificate in fields, including public accounting, accountant, treasury, and corporate finance issued by a recognized domestic or international institution.
2. Has at least 5 (five) years of work experience in economics, finance, and/or banking.

Composition and Term of Office of the Risk Monitoring Committee

The Risk Monitoring Committee is established with at least 3 (three) members, namely one chairman concurrently as Independent Commissioner and 2 (two) other members from independent parties. The term of office of Risk Monitoring Committee members shall not exceed the term of office of the Board of Commissioners as stipulated in the Articles of Association and can be extended for 1 (one) subsequent period.

As of 31 December 2025, the composition of the Bank's Risk Monitoring Committee, appointed based on Board of Directors' Decision Letter No. 003/SK-DIR/08/25 dated 1 August 2025 on the Composition of the Risk Monitoring Committee, for the 2025-present term of office is as follows:

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

Profil Komite Pemantau Risiko
Risk Monitoring Committee's Profile

ZAENAL ABIDIN PH.D
Ketua
Chairman

Dasar Pengangkatan dan Periode Menjabat

Basis of Appointment and Term of Office

Surat Keputusan Direksi No. 003/SK-DIR/08/25 tanggal 1 Agustus 2025 tentang Susunan Anggota Komite Pemantau Risiko (2025-sekarang).

Board of Directors' Decision Letter No. 003/SK-DIR/08/25 dated 1 August 2025 on the Composition of the Risk Monitoring Committee (2025-present).

Profil dapat dilihat pada profil Dewan Komisaris.
Profile can be seen in the Board of Commissioners' profile chapter.

GUNAWAN TENGGARAHARDJA
Anggota
Member

Dasar Pengangkatan dan Periode Menjabat

Basis of Appointment and Term of Office

Surat Keputusan Direksi No. 003/SK-DIR/08/25 tanggal 1 Agustus 2025 tentang Susunan Anggota Komite Pemantau Risiko (2025-sekarang).

Board of Directors' Decision Letter No. 003/SK-DIR/08/25 dated 1 August 2025 on the Composition of the Risk Monitoring Committee (2025-present).

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
60 tahun / years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 003/SK-DIR/08/25 tanggal 1 Agustus 2025 tentang Susunan Anggota Komite Pemantau Risiko (2025-sekarang).

Riwayat Pendidikan

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

Rangkap Jabatan Saat Ini

Di dalam Bank Victoria:
Anggota Komite Audit Bank Victoria (sejak 2021).

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan Sebelumnya

- Kolektor PT Jasa Marga (Persero) Tbk (1984-1986).
- *Teller* PT Bank Swadesi (1990-1991).
- Menjabat di PT Bank Intan (1991-1999) sebagai:
  - Sekretaris Kepala Biro Kredit.
  - *Internal Control Officer*.
  - Kepala Bagian Audit Kredit dan *Marketing*.
  - Kepala Bagian Kredit Support.
- Auditor Kantor Akuntan Publik Edi Kaslim & Kantor Akuntan Publik Gatot Permadi Djuwono (1999-2002).
- Kepala Bagian Akunting PT Bank Harmoni Internasional (2002-2007).
- Kepala Bagian Akunting PT Bank Index Selindo (2007-2008).
- Kepala Divisi Akunting PT Bank Swaguna (2008-2010).
- Kepala Divisi Akunting PT Bank Victoria Syariah (2010-2014).
- Akunting *Officer* Bank Victoria (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).
- Anggota Komite Pemantau Risiko PT Victoria Alife Indonesia (2021).
- Anggota Komite Audit Bank Victoria Syariah (2021-2025).
- Anggota Komite Pemantau Risiko Bank Victoria Syariah (2021-2025).

Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 003/SK-DIR/08/25 dated 1 August 2025 on the Composition of the Risk Monitoring Committee (2025-present).

Education

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

Current Concurrent Positions

In Bank Victoria:
Member of Audit Committee of Bank Victoria (since 2021).

Outside of Bank Victoria:
None.

History of Previous Positions

- Collector of PT Jasa Marga (Persero) Tbk (1984-1986).
- Teller of PT Bank Swadesi (1990-1991).
- Held positions at PT Bank Intan (1991-1999) as:
  - Secretary of Credit Bureau Head.
  - Internal Control Officer.
  - Credit and Marketing Audit Department Head.
  - Credit Support Department Head.
- Auditor of Edi Kaslim Public Accounting Firm & Gatot Permadi Djuwono Public Accounting Firm (1999-2002).
- Head of Accounting Department of PT Bank Harmoni Internasional (2002-2007).
- Head of Accounting Department of PT Bank Index Selindo (2007-2008).
- Accounting Division Head of PT Bank Swaguna (2008-2010).
- Accounting Division Head of PT Bank Victoria Syariah (2010-2014).
- Accounting Officer of Bank Victoria (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).
- Member of Risk Monitoring Committee of PT Victoria Alife Indonesia (2021).
- Member of Audit Committee of Bank Victoria Syariah (2021-2025).
- Member of Risk Monitoring Committee of Bank Victoria Syariah (2021-2025).

Sertifikasi

- Sertifikasi Manajemen Risiko Level 1 dari Badan Sertifikasi Manajemen Risiko (2007).
- Sertifikasi Manajemen Risiko Level 2 dari Badan Sertifikasi Manajemen Risiko (2011).
- Sertifikasi Manajemen Risiko Level 3 dari Badan Sertifikasi Manajemen Risiko (2018).
- Sertifikasi Kepatuhan Level 1 dari Lembaga Sertifikasi Profesi Perbankan (2018).
- Sertifikasi Kepatuhan Level 2 dari Lembaga Sertifikasi Profesi Perbankan (2018).
- *Certification in Audit Committee Practices* (CACP) (2023).
- Sertifikasi Manajemen Risiko - Jenjang 5 dari Lembaga Sertifikasi Perbankan Keuangan Syariah (2024).
- Sertifikasi Manajemen Risiko - Jenjang 6 dari Lembaga Sertifikasi Perbankan Keuangan Syariah (2025).
- Sertifikasi Manajemen Risiko - Jenjang 7 dari Lembaga Sertifikasi Perbankan Keuangan Syariah (2025).

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).
- Risk Management Certification Level 3 from the Risk Management Certification (2018).
- Compliance Certification Level 1 from the Banking Professional Certification Institute (2018).
- Compliance Certification Level 2 from the Banking Professional Certification Institute (2018).
- Certification in Audit Committee Practices (CACP) (2023).
- Certification of Risk Management - Level 5 from Sharia Financial Banking Certification Institution (2024).
- Certification of Risk Management - Level 6 from Sharia Financial Banking Certification Institution (2025).
- Certification of Risk Management - Level 7 from Sharia Financial Banking Certification Institution (2025).

Hubungan Afiliasi

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

Affiliation Relationship

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

TAUFIQ AKBAR

Anggota
Member

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Palembang

Usia / Age
38 tahun / years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat

Surat Keputusan Direksi No. 003/SK-DIR/08/25 tanggal 1 Agustus 2025 tentang Susunan Anggota Komite Pemantau Risiko (2025-sekarang).

Basis of Appointment and Term of Office

Board of Directors' Decision Letter No. 003/SK-DIR/08/25 dated 1 August 2025 on the Composition of the Risk Monitoring Committee (2025-present).

Riwayat Pendidikan

- Sarjana Akuntansi dari Universitas Islam Indonesia (2010).
- Magister Akuntansi dari Universitas Gadjah Mada (2012).

Education

- Bachelor's Degree in Accounting from Islamic University of Indonesia (2010).
- Master of Accountancy from Gadjah Mada University (2012).

Rangkap Jabatan

Di dalam Bank Victoria:
Anggota Komite Audit Bank Victoria (sejak 2025).

Di luar Bank Victoria:
Dosen di Perbanas Institute (sejak 2015).

Concurrent Positions

In Bank Victoria:
Member of Audit Committee of Bank Victoria (since 2025).

Outside of Bank Victoria:
Lecturer at Perbanas Institute (since 2015).

Riwayat Jabatan Sebelumnya

- Auditor KAP Bismar, Munthalib dan Yunus (2012-2013).
- Auditor KAP Joachim, Poltak, Lian, Michell & Rekan (2014).
- Komite Audit PT Sumberdaya Sewatama (2021-2023).

History of Previous Positions

- Auditor at KAP Bismar, Munthalib, and Yunus (2012–2013).
- Auditor at KAP Joachim, Poltak, Lian, Michell & Rekan (2014).
- Audit Committee of PT Sumberdaya Sewatama (2021-2023).

Sertifikasi

- *Chartered Accountant* dari Ikatan Akuntan Indonesia (2014).
- *Certification in Audit Committee Practices* dari Ikatan Komite Audit Indonesia (2021).
- Sertifikasi Manajemen Risiko - Jenjang 4 dari Lembaga Sertifikasi Profesi Perbankan (2025).

Certification

- Chartered Accountant from Institute of Indonesia Chartered Accountants (2014).
- Certification in Audit Committee Practices from the Indonesian Audit Committee Association (2021).
- Risk Management Certification – Level 4 from Banking Professional Certification Institute (2025).

Hubungan Afiliasi

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

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

Anggota Komite Pemantau Risiko ditetapkan dengan memperhatikan pemenuhan prinsip 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.
5. Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.

Independency of Risk Monitoring Committee

Members of the Risk Monitoring Committee are appointed by considering the following independence principles:

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.
5. Does not hold position as administrator of political party, state, and government.

Rapat Komite Pemantau Risiko

Rapat Komite Pemantau Risiko diselenggarakan minimal sekali setiap bulan dengan kehadiran sekurang-kurangnya 51% anggota, termasuk Komisaris Independen. Keputusan rapat diambil secara musyawarah mufakat atau suara terbanyak, dan dituangkan dalam risalah yang bersifat mengikat. Dalam hal terdapat konflik kepentingan, anggota yang bersangkutan tidak dilibatkan dalam pengambilan keputusan.

Rekapitulasi kehadiran masing-masing anggota Komite Pemantau Risiko dalam rapat di tahun 2025 sebagai berikut:

Risk Monitoring Committee's Meeting

Risk Monitoring Committee meetings are held at least once a month with at least 51% attendance of members, including Independent Commissioners. Meeting decisions are made by consensus or majority vote, and are recorded in binding minutes. In the event of a conflict of interest, the member concerned is not involved in the decision-making.

The summary of attendance of each member of Risk Monitoring Committee at meetings in 2025 is as follows:

Nama Name	Jabatan Position	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Zaenal Abidin Ph.D	Ketua Chairman	12	12	100.00
Gunawan Tenggarahardja	Anggota Member	12	12	100.00
Medi Sejati	Anggota Member	12	12	100.00
Taufiq Akbar*	Anggota Member	5	5	100.00
Yozef Abdulrachman*	Anggota Member	7	7	100.00

* Per 1 Agustus 2025, telah dilakukan perubahan keanggotaan Komite Pemantau Risiko, di mana Bapak Yozef Abdulrachman tidak lagi menjabat sebagai anggota Komite Pemantau Risiko dan posisinya digantikan oleh Bapak Taufiq Akbar. Perubahan tersebut dilakukan sesuai dengan ketentuan dan keputusan yang berlaku.

As of 1 August 2025, changes were made to the composition of the Risk Monitoring Committee. Mr. Yozef Abdulrachman no longer served as member of the Risk Monitoring Committee and his position was replaced by Mr. Taufiq Akbar. These changes were made in accordance with applicable regulations and decisions.

Agenda Rapat Komite Pemantau Risiko

Rapat Komite Pemantau Risiko membahas berbagai agenda, antara lain:

1. Laporan Tingkat Kesehatan Bank Periode Semester II Tahun 2024 PT Bank Victoria International Tbk dan Laporan Direktur Kepatuhan Periode Semester II Tahun 2024 PT Bank Victoria International Tbk.

Risk Monitoring Committee's Meeting Agenda

Risk Monitoring Committee meetings discuss various agenda items, including:

1. Bank Sound Level Report for Semester II of 2024 for PT Bank Victoria International Tbk and Compliance Director's Report for Semester II of 2024 for PT Bank Victoria International Tbk.

2. *Risk Register* Divisi *Operation* dan Divisi IT dan pemeriksaan Otoritas Jasa Keuangan kantor wilayah di cabang Medan dan Solo.
3. *Risk Register* Divisi SAM dan Peraturan Otoritas Jasa Keuangan dan Peraturan Bank Indonesia turunan Undang-Undang Pengembangan dan Penguatan Sektor Keuangan (P2SK) dan kaitannya dengan kebijakan internal bank.
4. Laporan Profil Risiko Periode Triwulan I Tahun 2025 dan Laporan *Self-Asessment* GCG Tahunan Tahun 2024.
5. Laporan Profil Risiko dan *Key Risk Indicator* (KRI) Periode April 2025 dan Pengisian Survei Otoritas Jasa Keuangan: Penilaian Mandiri Pedoman SETARA.
6. Laporan Profil Risiko, *Risk Register* HCM & SAM Periode Mei 2025 dan Progres Tindak Lanjut Temuan Otoritas Jasa Keuangan Tahun 2024 Posisi Juni 2025.
7. Laporan Tingkat Kesehatan Bank Periode Semester I Tahun 2025 dan Laporan Direktur Kepatuhan Periode Semester I Tahun 2025.
8. Pembahasan Laporan Profil Risiko Periode Juli 2025, pembahasan sosialisasi Peraturan Otoritas Jasa Keuangan dan Rancangan Peraturan Otoritas Jasa Keuangan, pembahasan hasil validasi *self-asessment compliance*, dan pembahasan progres pemeriksaan Otoritas Jasa Keuangan 2025.
9. Laporan Risiko *Information Technology*, progres pemeriksaan Otoritas Jasa Keuangan tahun 2025, dan *work plan for developing departmental system procedure.*
10. Laporan Profil Risiko Triwulan III Tahun 2025, sosialisasi dan rencana tindak lanjut Peraturan Otoritas Jasa Keuangan No. 19 Tahun 2025, dan *self-asessment* Tim Pelindungan Konsumen.
11. Penginian *Recovery Plan* (RCP), dan kegiatan pengelolaan kepatuhan dan pelaporan regulator.
12. Penguatan *Business Continuity Plan* (BCP) serta capaian kegiatan dan progres kepatuhan 2025.

2. Risk Register for the Operations Division and IT Division, and Audit by Financial Services Authority of Medan and Solo branch offices.
3. Risk Register for SAM Division, Financial Services Authority Regulations, and Bank Indonesia Regulations derived from the Financial Sector Development and Strengthening Law (P2SK) and their relationship to internal bank policies.
4. Risk Profile Report for Quarter I of 2025 and the 2024 Annual GCG Self-Assessment Report.
5. Risk Profile and Key Risk Indicator (KRI) Report for April 2025 and Completion of the Financial Services Authority Survey: Self-Assessment of SETARA Guidelines.
6. Risk Profile Report, HCM & SAM Risk Register for May 2025 and Progress on Follow-up of Financial Services Authority Findings for 2024 as of June 2025.
7. Bank Sound Level Report for Semester I of 2025 and Compliance Director's Report for Semester I of 2025.
8. Discussion of Risk Profile Report for July 2025, discussion of the dissemination of Financial Services Authority Regulations and Draft Financial Services Authority Regulations, discussion of the results of compliance self-assessment validation, and discussion of the progress of the 2025 Financial Services Authority audit.
9. Information Technology Risk Report, progress of Financial Services Authority audit in 2025, and work plan for developing departmental system procedures.
10. Risk Profile Report for Quarter III of 2025, dissemination and follow-up plan for Financial Services Authority Regulation No. 19 of 2025, and self-assessment of the Consumer Protection Team.
11. Update on the Recovery Plan (RCP), and compliance management activities and regulatory reporting.
12. Reinforcement of Business Continuity Plan (BCP) and achievement of compliance activities and progress in 2025.

Laporan Singkat Pelaksanaan Kegiatan Komite Pemantau Risiko Tahun 2025

Selama tahun 2025, Komite Pemantau Risiko secara konsisten menjalankan berbagai aktivitas dalam rangka memenuhi mandat, tugas, serta tanggung jawabnya, yang dapat dijabarkan sebagai berikut:

1. Melakukan rapat dan *review* terhadap efektivitas pelaksanaan manajemen risiko dan kepatuhan Bank.
2. Melakukan rapat dan *review* atas penilaian risiko oleh Satuan Kerja Manajemen Risiko dan Laporan Kepatuhan oleh Divisi Kepatuhan, termasuk kegiatannya dalam memantau mitigasi oleh *Risk Taking Unit*.
3. Melakukan pengawasan atas pelaksanaan rekomendasi Komite oleh Satuan Kerja Manajemen Risiko dan/atau Divisi Kepatuhan.

Brief Report on Implementation of Risk Monitoring Committee's Activities in 2025

Throughout 2025, the Risk Monitoring Committee consistently carried out various activities to fulfill its mandate, duties, and responsibilities, outlined as follows:

1. Holding meetings and reviews on the effectiveness of the Bank's risk management and compliance implementation.
2. Holding meetings and reviews on risk assessments by the Risk Management Work Unit and Compliance Reports by the Compliance Division, including monitoring mitigation activities by the Risk Taking Unit.
3. Supervising the implementation of Committee recommendations by the Risk Management Work Unit and/or Compliance Division.

4. Penelaahan atas informasi risiko dan manajemen risiko Bank dalam laporan-laporan yang dipublikasikan.
5. Penelaahan kepatuhan terhadap peraturan perundang-undangan dan ketentuan yang berlaku.
6. Pelaksanaan tugas khusus dan tugas lain-lain.

Selain itu, Komite Pemantau Risiko juga telah melakukan penelaahan dan peninjauan melalui analisa laporan maupun rapat, yang hasilnya disampaikan kepada Dewan Komisaris melalui Memo Intern. Beberapa hal yang dikaji meliputi penelaahan atas profil risiko dan Laporan Kepatuhan Bank untuk Posisi Semester II Tahun 2024 dan Posisi Maret, Juni, dan September Tahun 2025. Komite juga memberikan berbagai arahan hasil penelaahan terkait profil risiko dan kepatuhan Bank untuk posisi semester II tahun 2024 dan posisi Maret, Juni, dan September tahun 2025.

Pelatihan dan/atau Peningkatan Komite Pemantau Risiko

Sepanjang tahun 2025, pengembangan kompetensi bagi Zaenal Abidin, Ph.D, dan Gunawan Tenggarahardja tercermin melalui program pelatihan serta peningkatan kompetensi Dewan Komisaris. Adapun pengembangan kompetensi bagi anggota Komite Pemantau Risiko lainnya sebagai berikut:

4. Reviewing the Bank's risk and risk management information in published reports.
5. Reviewing compliance with applicable laws and regulations.
6. Implementing special duties and other duties.

Furthermore, the Risk Monitoring Committee also conducted assessment and review through report analysis and meetings, the results of which were submitted to the Board of Commissioners through Internal Memo. Some of the matters reviewed included a review of the Bank's risk profile and Compliance Report for Semester II of 2024 and March, June, and September 2025. The Committee also provided various directives on the review results regarding the Bank's risk profile and compliance for semester II of 2024 and March, June, and September 2025.

Risk Monitoring Committee's Training and/or Development Programs

Throughout 2025, the competency developments for Zaenal Abidin, Ph.D, and Gunawan Tenggarahardja were reflected in training programs and competency development of the Board of Commissioners. Competency development for other members of the Risk Monitoring Committee is as follows:

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance	
	Medi Sejati	Taufiq Akbar
Sharing Session "Suistainable Growth Through Digitalization and Strong Governance" – oleh Internal Bank Victoria Sharing Session "Sustainable Growth Through Digitalization and Strong Governance" – Organized by Bank Victoria Internally	✓	✓
Training Pembekalan Manajemen Risiko Jenjang 7 – Diselenggarakan oleh Arfaidhams Secret Briefing Training on Risk Management Level 7 – Organized by Arfaidhams Secret	✓	✓
Training Pembekalan Manajemen Risiko Jenjang 4 – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia Briefing Training on Risk Management Level 4 – Indonesian Banking Development Institute	-	✓
Team Building: "Work Hard Vacation Harder" – Diselenggarakan oleh Internal Bank Victoria Team Building: "Work Hard Vacation Harder" – Organized by Bank Victoria Internally	✓	✓
Training IT Risk Management – Diselenggarakan oleh Acumen Advice Training & Consulting IT Risk Management Training – Organized by Acumen Advice Training & Consulting	-	✓

Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi merupakan komite yang terdiri dari anggota Dewan Komisaris dan Pejabat Eksekutif Bank yang membawahkan fungsi kepegawaian. Berdasarkan Surat Keputusan Komisaris, ditetapkan sebagai anggota Komite Remunerasi dan Nominasi dengan cakupan tugas, tanggung jawab, dan kewenangan untuk melakukan evaluasi, memberikan masukan dan/atau arahan atas (usulan) kebijakan remunerasi yang ditetapkan dan diterapkan Bank.

Remuneration and Nomination Committee

Remuneration and Nomination Committee is a committee consisting of members of the Board of Commissioners and Bank Executive Officers responsible for personnel functions. Members of the Remuneration and Nomination Committee are appointed based on Board of Commissioners' Decision Letter with the scope of duties, responsibilities, and authority to evaluate, provide input and/or direction on (proposed) remuneration policy established and implemented by the Bank.

Pedoman Komite Remunerasi dan Nominasi

Pedoman kerja Komite Remunerasi dan Nominasi telah ditetapkan dan diperbarui melalui Keputusan Dewan Komisaris No. 001/SK-KOM/01/24 tanggal 5 Januari 2024, yang menjadi acuan utama dalam pelaksanaan tugas serta tata tertib Komite Remunerasi dan Nominasi Bank.

Tugas dan Tanggung Jawab Komite Remunerasi dan Nominasi

Dalam mendukung fungsi pengawasan serta peningkatan tata kelola, Komite Remunerasi dan Nominasi menjalankan sejumlah tugas dan tanggung jawab yang mencakup aspek evaluasi, pemberian rekomendasi, serta pengawasan kebijakan, antara lain:

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.
   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.
   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.

Remuneration and Nomination Committee Charter

The Remuneration and Nomination Committee Charter is established and updated through Board of Commissioners' Decision No. 001/SK-KOM/01/24 dated 5 January 2024, which serves as the primary reference for implementing duties and procedures of the Remuneration and Nomination Committee of the Bank.

Duties and Responsibilities of Remuneration and Nomination Committee

To support supervisory function and improve governance, the Remuneration and Nomination Committee carries out a number of duties and responsibilities, including evaluation, recommendation, and policy oversight, including:

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.
   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.
   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.

b. Membantu Direksi dalam mengevaluasi sistem *Human Capital Management & General Affair*, serta kebijakan pengembangan HC, termasuk rekrutmen, asesmen, peningkatan kompetensi, evaluasi, promosi, demosi, terminasi, suksesi, seleksi, dan tugas lainnya.

b. To assist the Board of Directors in evaluating the Human Capital Management & General Affair system, and HC development policy, including recruitment, assessment, competency development, evaluation, promotion, demotion, termination, succession, selection, and other duties.

Persyaratan Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi paling sedikit terdiri atas seorang Komisaris Independen yang merangkap sebagai ketua, seorang Komisaris Non-Independen, serta seorang Pejabat Eksekutif yang membawahkan fungsi HC atau 1 (satu) orang perwakilan pegawai Bank. Pejabat Eksekutif atau perwakilan pegawai yang menjadi anggota Komite Remunerasi dan Nominasi wajib memiliki pengetahuan dan pemahaman yang memadai mengenai sistem remunerasi dan/atau sistem nominasi serta rencana suksesi (*succession plan*) Bank.

Requirements for the Remuneration and Nomination Committee

Remuneration and Nomination Committee shall consist of at least one Independent Commissioner concurrently as chairman, one Non-Independent Commissioner, and one Executive Officer in charge of HC or 1 (one) employee representative of the Bank. Executive Officer or employee representative serving as Remuneration and Nomination Committee member shall have adequate knowledge and understanding of the Bank's remuneration and/or nomination system and succession plan.

Komposisi dan Masa Jabatan Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi minimal beranggotakan 3 (tiga) orang yang terdiri dari Komisaris Independen sebagai ketua, anggota Komisaris, serta Pejabat Eksekutif yang membawahkan Divisi *Human Capital Management* atau perwakilan pegawai. Masa jabatan Komite Remunerasi dan Nominasi ditetapkan mengikuti masa jabatan Dewan Komisaris, dan dapat diperpanjang melalui pengangkatan kembali untuk periode berikutnya sesuai ketentuan yang berlaku.

Per 31 Desember 2025, komposisi Komite Remunerasi dan Nominasi Bank yang diangkat berdasarkan Surat Keputusan Direksi No. 002C/SK-DIR/11/22 tanggal 9 November 2022, untuk masa jabatan 2022-sekarang sebagai berikut:

Composition and Term of Office of the Remuneration and Nomination Committee

The Remuneration and Nomination Committee consists of at least 3 (three) members comprising Independent Commissioner as chairman, member of the Board of Commissioners, and Executive Officer in charge of Human Capital Management Division or an employee representative. The term of office of Remuneration and Nomination Committee is determined by the Board of Commissioners and can be extended through reappointment for subsequent period in accordance with applicable regulations.

As of 31 December 2025, the composition of the Bank's Remuneration and Nomination Committee, appointed based on Board of Directors' Decision Letter No. 002C/SK-DIR/11/22 dated 9 November 2022 for the 2022-present term of office, is as follows:

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

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

GUNAWAN TENGGARAHARDJA

Ketua
Chairman

Dasar Pengangkatan dan Periode Menjabat

Basis of Appointment and Term of Office

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

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

Profil dapat dilihat pada profil Dewan Komisaris.
Profile can be seen in the Board of Commissioners' profile chapter.

SIA LENG HO

Anggota
Member

Dasar Pengangkatan dan Periode Menjabat

Basis of Appointment and Term of Office

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

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

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
52 tahun / 52 years old

Domisili / Domicile
Jakarta

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

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

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

Di luar Bank Victoria:
Tidak ada.

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

Sertifikasi
- Sertifikasi bidang Manajemen Risiko Perbankan Jenjang 5 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).
- Sertifikasi *Manager* SDM dari Lembaga Sertifikasi Profesi Manajemen Sumber Daya Manusia (2025-2028).

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/SK-DIR/11/22 dated 9 November 2022 (2022-now).

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

Current 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 Previous Positions
- Senior Staff of Human Resource Department (Recruitment and Manpower) of PT Bank Ekonomi Raharja Tbk (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).
- Held positions at Bank Victoria as:
  - Head of Human Resources and General Affair Division (2003-2012).
  - Head of Human Capital Management Division (2012-2017).
  - Head of Human Resources and General Affair Division (2019).

Certification
- Certification of Banking Risk Management Level 5 from Banking Profession Certification Institute (2024-2027).
- Certification of HR Manager from Human Resource Management Professional Certification Institute (2025-2028).

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 Remunerasi dan Nominasi

Anggota Remunerasi dan Nominasi ditetapkan dengan memperhatikan pemenuhan prinsip 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 Remunerasi dan Nominasi.
5. Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.

Independency of Remuneration and Nomination Committee

Members of the Remuneration and Nomination Committee are appointed by considering the following independence principles:

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 Remuneration and Nomination Committee.
5. Does not hold position as administrator of political party, state, and government.

Rapat Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi melaksanakan rapat sekurang-kurangnya sekali setiap 3 (tiga) bulan, baik secara tatap muka, media elektronik, maupun keputusan sirkular. Rapat dapat diselenggarakan apabila dihadiri oleh lebih dari separuh dari jumlah anggota. Keputusan rapat diambil berdasarkan musyawarah mufakat atau suara terbanyak, dan seluruh hasil rapat dituangkan dalam risalah serta dilaporkan kepada Dewan Komisaris.

Rekapitulasi kehadiran masing-masing anggota Komite Remunerasi dan Nominasi dalam rapat di tahun 2025 sebagai berikut:

Remuneration and Nomination Committee's Meeting

The Remuneration and Nomination Committee holds meetings at least once every 3 (three) months, either in person, electronically, or through circular decisions. Meeting can be held if attended by more than half of the total members. Meeting decisions are made by consensus or majority vote, and all meeting results are recorded in minutes and reported to the Board of Commissioners.

The summary of attendance of each member of Remuneration and Nomination Committee at meetings in 2025 is as follows:

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

Agenda Rapat Komite Remunerasi dan Nominasi

Rapat Komite Remunerasi dan Nominasi membahas berbagai agenda, antara lain:

1. Struktur organisasi.
2. Rekomendasi pencalonan Dewan Komisaris dan Direksi.
3. Kebijakan Pedoman Gratifikasi/Bonus Tahun 2024-2025 bagi Pengurus dan Pegawai Bank untuk rekomendasi kepada Dewan Komisaris.
4. Kebijakan kenaikan remunerasi bagi pengurus dan karyawan.
5. Perubahan struktur organisasi.
6. Penggantian anggota Komite Audit dan anggota Komite Pemantau Risiko untuk rekomendasi kepada Dewan Komisaris.
7. Evaluasi dan perubahan struktur organisasi.

Remuneration and Nomination Committee's Meeting Agenda

Remuneration and Nomination Committee meetings discuss various agenda items, including:

1. Organizational structure.
2. Recommendations for nominations to the Board of Commissioners and Board of Directors.
3. Policy on the 2024-2025 Gratification/Bonus Guidelines for the Bank's Management and Employees for recommendation to the Board of Commissioners.
4. Policy on remuneration increase for the management and employees.
5. Changes to the organizational structure.
6. Replacement of Audit Committee members and Risk Monitoring Committee members for recommendation to the Board of Commissioners.
7. Evaluation and changes to the organizational structure.

Laporan Singkat Pelaksanaan Kegiatan Komite Remunerasi dan Nominasi Tahun 2025

Selama tahun 2025, Komite Nominasi dan Remunerasi melaksanakan tugas dan tanggung jawab serta memberikan beberapa rekomendasi di antaranya sebagai berikut:

1. Struktur organisasi.
2. Rekomendasi pencalonan Dewan Komisaris dan Direksi.
3. Kebijakan Pedoman Gratifikasi/Bonus Tahun 2024-2025 bagi Pengurus dan Pegawai Bank untuk rekomendasi kepada Dewan Komisaris.

Brief Report on Implementation of Remuneration and Nomination Committee's Activities in 2025

Throughout 2025, the Nomination and Remuneration Committee carried out its duties and responsibilities and provided several recommendations, including the following:

1. Organizational structure.
2. Recommendations for nominations to the Board of Commissioners and Board of Directors.
3. Policy on the 2024-2025 Gratification/Bonus Guidelines for the Bank's Management and Employees for recommendation to the Board of Commissioners.

4. Kebijakan kenaikan remunerasi bagi pengurus dan karyawan.
5. Perubahan struktur organisasi.
6. Penggantian anggota Komite Audit dan anggota Komite Pemantau Risiko untuk rekomendasi kepada Dewan Komisaris.
7. Evaluasi dan perubahan struktur organisasi.

Pelatihan dan/atau Peningkatan Komite Remunerasi dan Nominasi

Sepanjang tahun 2025, pengembangan kompetensi bagi Gunawan Tenggarahardja dan Sia Leng Ho tercermin melalui program pelatihan serta peningkatan kompetensi Dewan Komisaris. Adapun pengembangan kompetensi bagi Ibu Syahda Candra sebagai berikut:

1. *Sharing Session "Sustainable Growth Through Digitalization and Strong Governance"* – Diselenggarakan oleh Internal Bank Victoria.
2. *Training Refreshment* Manajemen Risiko Jenjang 5 – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia.
3. *Training Talkshow Women's Leadership* – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia.
4. Training *Idea Talks Riset* OJK Institute Volume 8 Tahun 2025 – Diselenggarakan oleh Otoritas Jasa Keuangan.
5. Webinar "Memutus Mata Rantai *Scam*: Sinergi dan Strategi Perlindungan Konsumen Sektor Keuangan" – Diselenggarakan oleh OJK Institute.
6. Uji Sertifikasi *Manager* Sumber Daya Manusia – Diselenggarakan oleh Lembaga Pengembangan Manajemen Sumber Daya Manusia.
7. *Training Refreshment Financial Integrity Rating* (FIR) 2025 dan Tindak Pidana Pencucian Uang Pidana Pencucian Uang – Diselenggarakan oleh Andara Sarana.
8. *Training Human Capital Beyond & Summit* (IHCBS) Uang – Diselenggarakan oleh QuBisa.
9. *Team Building: "Together We Grow, Together We Go"* – Diselenggarakan oleh Internal Bank Victoria.
10. *Training Building a Fraud-Resilent Bank: From Detection to Response* – Diselenggarakan oleh Internal Bank Victoria.
11. *Training* Bahaya Pinjaman *Online* – Diselenggarakan oleh Internal Bank Victoria.
12. *Training: Expert Sharing Session* "Transformasi Digital IT Perbankan – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia.
13. *Training* Strategi dan Implementasi Pelindungan Konsumen dan Data Pribadi – Diselenggarakan oleh Victoria Institute.
14. *Training Indonesia Marketing Convention* – Diselenggarakan oleh MarkPlus.
15. *Training Driving Branch Productivity Through Effective Leadership* – Diselenggarakan oleh Edcore Indonesia.

4. Policy on remuneration increase for the management and employees.
5. Changes to the organizational structure.
6. Replacement of Audit Committee members and Risk Monitoring Committee members for recommendation to the Board of Commissioners.
7. Evaluation and changes to the organizational structure.

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

Throughout 2025, the competency developments for Gunawan Tenggarahardja and Sia Leng Ho were reflected in training programs and competency development of the Board of Commissioners. Competency development for Ms. Syahda Candra was as follows:

1. Sharing Session "Sustainable Growth Through Digitalization and Strong Governance" – Organized by Bank Victoria Internally.
2. Training Refreshment of Risk Management Level 5 – Organized by Indonesian Banking Development Institute.
3. Training Talkshow Women's Leadership – Organized by Indonesian Banking Development Institute.
4. Training Idea Talks of OJK Institute Research Volume 8 of 2025 – Organized by Financial Services Authority.
5. Webinar "Breaking the Chain of Scams: Synergy and Consumer Protection Strategy in the Financial Sector" – Organized by OJK Institute.
6. Certification Test of Human Resources Manager – Organized by Human Resource Management Development Institute.
7. Training Refreshment Financial Integrity Rating (FIR) 2025 and Money Laundering Crimes – Organized by Andara Sarana.
8. Training Human Capital Beyond & Summit (IHCBS) Money – Organized by QuBisa.
9. Team Building: "Together We Grow, Together We Go" – Organized by Bank Victoria.
10. Training Building a Fraud-Resilent Bank: From Detection to Response Training – Organized by Bank Victoria.
11. Training on Online Loan Dangers – Organized by Bank Victoria.
12. Training: Expert Sharing Session "Digital Transformation of Banking IT" - Organized by Indonesian Banking Development Institute.
13. Training on Strategy and Implementation of Consumer Protection and Personal Data - Organized by Victoria Institute.
14. Training Indonesia Marketing Convention - Organized by MarkPlus.
15. Training Driving Branch Productivity Through Effective Leadership - Organized by Edcore Indonesia.

Komite Audit

Komite Audit merupakan salah satu perangkat Dewan Komisaris Bank yang dibentuk berdasarkan keputusan Dewan Komisaris yang bekerja secara kolektif dan berfungsi membantu serta bertanggung jawab kepada Dewan Komisaris.

Pedoman Komite Audit

Komite Audit menjalankan tugas dan tanggung jawabnya berlandaskan Piagam Komite Audit yang telah diperbarui melalui Keputusan Dewan Komisaris No. 001/SK-KOM/06/25 tanggal 18 Juni 2025 tentang Pedoman dan Tata Tertib Kerja Komite Audit PT Bank Victoria International Tbk.

Tugas dan Tanggung Jawab Komite Audit

Komite Audit telah melakukan tindakan sebagaimana dimaksud dalam Pasal 10 Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit terkait dengan penyusunan dan penerbitan Laporan Keuangan Tahunan per 31 Desember 2025 dan Laporan Tahunan 2025. Dalam pelaksanaan tugas tersebut, Komite Audit telah melaksanakan pengkajian terhadap Laporan Keuangan, melakukan pembahasan dengan manajemen, memberikan rekomendasi kepada Dewan Komisaris mengenai penunjukan akuntan publik yang didasarkan pada independensi, ruang lingkup penugasan, dan imbalan jasa serta berkomunikasi dengan akuntan publik yang ditunjuk untuk audit Laporan Keuangan Tahunan 2025. Sebagai bagian dari proses tersebut, Komite Audit telah menyelenggarakan rapat internal serta rapat dengan akuntan publik dan pihak terkait lainnya.

Adapun tugas dan tanggung jawab Komite Audit meliputi hal-hal berikut:

1. Melakukan penelaahan dan klarifikasi atas informasi keuangan yang akan dikeluarkan Bank atau perusahaan publik 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 3 (tiga) tahunan.
5. Melakukan penelaahan atas pelaksanaan pemeriksaan oleh auditor internal dan mengawasi pelaksanaan tindak lanjut oleh Direksi atas temuan auditor internal.
6. Mengevaluasi efektivitas pengendalian internal.
7. Memastikan kegiatan operasi Bank dijalankan dengan mematuhi peraturan perundang-undangan yang berlaku.

Audit Committee

Audit Committee is a component of the Bank's Board of Commissioners, established based on the Board of Commissioners' decision, that works collectively and assists and reports to the Board of Commissioners.

Audit Committee Charter

The Audit Committee carries out its duties and responsibilities based on Audit Committee Charter, updated through Board of Commissioners' Decision No. 001/SK-KOM/06/25 dated 18 June 2025 on the Charter and Work Guidelines of Audit Committee of PT Bank Victoria International Tbk.

Duties and Responsibilities of Audit Committee

The Audit Committee has taken actions as referred to in Article 10 of Financial Services Authority Regulation No. 55/POJK.04/2015 on Establishment and Guideline for Duty Implementation of Audit Committee related to the preparation and issuance of Annual Financial Statements as of 31 December 2025 and the 2025 Annual Report. In performing these duties, the Audit Committee reviewed the Financial Statements, held discussions with management, provided recommendations to the Board of Commissioners regarding the appointment of public accountant based on independence, scope of assignment, and service fees, and communicated with the public accountant appointed to audit the 2025 Annual Financial Statements. As part of such process, the Audit Committee held internal meetings and meetings with public accountants and other related parties.

Duties and responsibilities of the Audit Committee include the following:

1. Reviewing and clarifying the financial information to be issued by the Bank or public company 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 performances 3 (three) years.
5. Reviewing the audit conducted by internal auditor and supervising the follow-up conducted by the Board of Directors on internal auditor findings.
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. Melakukan koordinasi dengan Komite Manajemen Risiko dalam hal pemantauan risiko dan mitigasinya.
9. Melakukan penilaian sendiri terhadap efektivitas pelaksanaan tugas Komite Audit.

Komite Audit juga mempunyai wewenang sebagaimana diatur dalam Pasal 11 Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 di antaranya:

1. Mengakses dokumen, data, dan informasi Bank tentang karyawan, dana, aset, dan sumber daya Bank yang diperlukan.
2. Berkomunikasi langsung dengan karyawan, termasuk Direksi dan pihak yang menjalankan fungsi audit internal, manajemen risiko, dan akuntan terkait tugas dan tanggung jawab Komite Audit.
3. Melibatkan pihak independen di luar anggota Komite Audit yang diperlukan untuk membantu pelaksanaan tugasnya (jika diperlukan).
4. Melakukan kewenangan lain yang diberikan oleh Dewan Komisaris.

Dalam menjalankan wewenangnya, Komite Audit tidak mengalami kendala atau pembatasan, sehingga dapat menjalankan tugasnya secara optimal. Namun, jika di masa mendatang terdapat kendala atau hambatan yang menghalangi pelaksanaan wewenangnya, Komite Audit akan segera melaporkannya kepada Dewan Komisaris dan berkoordinasi untuk mencari solusi yang tepat. Dengan demikian, Komite memastikan bahwa tugas dan tanggung jawabnya tetap dapat dijalankan secara efektif, sesuai dengan prinsip GCG.

Persyaratan Komite Audit

Keanggotaan Komite Audit wajib seluruhnya independen, yang paling sedikit terdiri dari:

1. 1 (satu) orang Komisaris Independen yang merangkap sebagai ketua.
2. 1 (satu) orang pihak independen yang memiliki keahlian di bidang keuangan atau bidang akuntansi.
3. 1 (satu) orang pihak independen yang memiliki keahlian di bidang hukum atau bidang perbankan.

Anggota Komite Audit yang berasal dari pihak independen dinilai memiliki keahlian di bidang keuangan atau bidang akuntansi dalam hal memenuhi kriteria:

1. Memiliki sertifikat kompetensi di bidang keuangan dan/atau bidang akuntansi yang diterbitkan oleh lembaga domestik maupun lembaga internasional yang diakui.
2. Memiliki pengalaman kerja paling sedikit 5 (lima) tahun di bidang keuangan dan/atau bidang akuntansi.

Anggota Komite Audit yang berasal dari pihak independen dinilai memiliki keahlian di bidang hukum atau bidang perbankan dalam hal memenuhi kriteria:

8. Coordinating with the Risk Management Committee in risk monitoring and mitigation.
9. Conducting self-assessment on the effectiveness of implementation of Audit Committee's duties.

The Audit Committee also has the authority as stipulated in Article 11 of Financial Services Authority Regulation No. 55/POJK.04/2015, including:

1. Access the Bank's document, data, and information about Bank's employees, funds, assets, and resources required.
2. Communicate directly with employees, including Board of Directors and parties carrying out functions of internal audit, risk management, and accountant, related to the duties and responsibilities of the Audit Committee.
3. Involve independent parties outside the Audit Committee members who are required to assist in performing their duties (if necessary).
4. Perform other authorities assigned by the Board of Commissioners.

In exercising its authority, the Audit Committee did not experience any obstacles or restrictions, and therefore, it could perform its duties optimally. However, in the event of any obstacles or barriers in the future that hinder the implementation of its authority, the Audit Committee will immediately report it to the Board of Commissioners and coordinate to find the right solution. Thus, the Committee ensures that its duties and responsibilities can still be carried out effectively, in accordance with GCG principles.

Requirements for the Audit Committee

The composition of Audit Committee shall be entirely independent, consisting of at least:

1. 1 (one) Independent Commissioner concurrently as chairman.
2. 1 (one) independent party with expertise in finance or accounting.
3. 1 (one) independent party with expertise in law or banking.

Member of Audit Committee from independent party is deemed to have expertise in finance or accounting, as defined by the following criteria:

1. Has competency certificate in finance and/or accounting issued by a recognized domestic or international institution.
2. Has at least 5 (five) years of work experience in finance and/or accounting.

Member of Audit Committee from independent party is deemed to have expertise in law or banking, as defined by the following criteria:

1. Memiliki sertifikat kompetensi di bidang hukum, antara lain legal auditor, notaris, dan/atau ahli kontrak yang diterbitkan oleh lembaga domestik maupun lembaga internasional yang diakui.
2. Memiliki sertifikat kompetensi di bidang perbankan, antara lain manajemen risiko sebagaimana yang berlaku bagi Dewan Komisaris, kepatuhan, akuntan publik, akuntan, *general banking*, *wealth management*, perencanaan strategis, teknologi informasi, treasuri, audit terkait perbankan, *corporate finance*, sistem pembayaran dan pengelolaan uang Rupiah, perlindungan konsumen, dan aspek pasar modal, yang diterbitkan oleh lembaga domestik maupun lembaga internasional yang diakui.
3. Memiliki pengalaman kerja paling sedikit 5 (lima) tahun di bidang hukum dan/atau bidang perbankan.

1. Has competency certificate in law, including legal audit, notary, and/or contract expert, issued by a recognized domestic or international institution.
2. Has competency certificate in banking, including risk management as applicable to the Board of Commissioners, compliance, public accounting, general banking, wealth management, strategic planning, information technology, treasury, banking-related audits, corporate finance, payment system and Rupiah currency management, consumer protection, and capital market aspect, issued by a recognized domestic or international institution.
3. Has at least 5 (five) years of work experience in law and/or banking.

Komposisi dan Masa Jabatan Komite Audit

Komite Audit terdiri dari sekurang-kurangnya 3 (tiga) anggota independen, yang mencakup Komisaris Independen sebagai ketua serta pihak independen dengan keahlian di bidang keuangan, akuntansi, hukum, atau perbankan. Masa tugas anggota mengikuti masa jabatan Dewan Komisaris dan dapat diperpanjang sesuai ketentuan. Dalam menjalankan fungsinya, Komite Audit didukung oleh staf atau sekretaris yang ditunjuk, sementara anggota independen berhak atas honorarium sesuai keputusan Dewan Komisaris dan peraturan yang berlaku.

Per 31 Desember 2025, komposisi Komite Audit Bank yang diangkat berdasarkan Surat Keputusan Direksi No. 004/SK-DIR/08/25 tanggal 1 Agustus 2025, untuk masa jabatan 2025-sekarang sebagai berikut:

Composition and Term of Office of the Audit Committee

The Audit Committee consists of at least 3 (three) independent members, including Independent Commissioner as chair and independent party with expertise in finance, accounting, law, or banking. Members' term of office follows the term of office of the Board of Commissioners and can be extended as required. In carrying out its functions, Audit Committee is supported by appointed staff or a secretary, while independent members are entitled to honorarium in accordance with the Board of Commissioners' decision and applicable regulations.

As of 31 December 2025, the composition of the Bank's Audit Committee, appointed based on Board of Directors' Decision Letter No. 004/SK-DIR/08/25 dated 1 August 2025, for the 2025-present term of office, is as follows:

Nama Name	Posisi di Komite Position in the Committee	Jabatan di Bank Position at the Bank	Keahlian Expertise
Zaenal Abidin Ph.D	Ketua Chairman	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
Taufiq Akbar	Anggota Member	Pihak Independen Independent Party	Keuangan, Perbankan, dan Manajemen Risiko Finance, Banking, and Risk Management

Bank menunjuk 1 (satu) Komisaris Independen sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17 Pasal 64 ayat 4, sebagai Ketua Komite Audit merangkap sebagai anggota Komite Audit. Meskipun Ketua Komite Audit juga menjabat sebagai Komisaris Utama Independen, Bank memastikan pelaksanaan tugas dan tanggung jawab dijalankan secara profesional dan independen sesuai prinsip GCG, sehingga integritas serta objektivitas dalam fungsi pengawasan tetap terjaga.

The Bank appointed 1 (one) Independent Commissioner in accordance with Financial Services Authority Regulation No. 17 Article 64 paragraph 4, as the Chairman of Audit Committee and concurrently serving as member of Audit Committee. Though the Chairman of Audit Committee also serves as Independent President Commissioner, the Bank ensures that the duties and responsibilities are carried out professionally and independently in accordance with GCG principles, thereby maintaining integrity and objectivity in supervisory function.

Profil Komite Audit

Informasi mengenai profil Komite Audit telah disampaikan pada Profil Dewan Komisaris serta Profil Komite Pemantau Risiko sebagai bagian dari transparansi tata kelola perusahaan.

Independensi Komite Audit

Anggota Komite Audit melaksanakan tugas secara independen tanpa intervensi dari pihak mana pun, dengan tetap menjaga objektivitas dan integritas dalam setiap pengambilan keputusan, sebagaimana tercermin dalam pemenuhan prinsip 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 Audit.
5. Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.

Rapat Komite Audit

Komite Audit menyelenggarakan rapat sedikitnya sekali sebulan atau sesuai kebutuhan, dengan usulan dapat diajukan oleh Sekretaris maupun anggota. Rapat hanya dihadiri anggota Komite Audit dan pihak yang diundang, termasuk SKAI, Anti-*Fraud & ICOFR* Departemen, auditor eksternal, atau narasumber lain yang relevan. Rapat sah apabila dihadiri minimal 51% anggota, termasuk Komisaris Independen dan pihak independen, dengan keputusan diambil melalui musyawarah mufakat atau suara terbanyak jika mufakat tidak tercapai.

Rekapitulasi kehadiran masing-masing anggota Komite Audit dalam rapat di tahun 2025 sebagai berikut:

Audit Committee's Profile

Information on Audit Committee profile is presented in the Board of Commissioners Profile and Risk Monitoring Committee Profile as part of corporate governance transparency.

Independency of the Audit Committee

Members of the Audit Committee carry out their duties independently without intervention from any party, while maintaining objectivity and integrity in all decision-making, as reflected in the following independence principles:

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 Audit Committee.
5. Does not hold position as administrator of political party, state, and government.

Audit Committee's Meeting

The Audit Committee holds meetings at least once a month or as necessary, with proposals submitted by the Secretary or members. Meetings are only attended by Audit Committee members and invited parties, including SKAI, Anti-Fraud & ICOFR Department, external auditors, or other relevant sources. A meeting is valid if attended by at least 51% of members, including Independent Commissioners and independent parties, with decisions made by consensus or by majority vote in the event consensus is not reached.

The summary of attendance of each member of Audit Committee at meetings in 2025 is as follows:

Nama Name	Jabatan Position	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Zaenal Abidin Ph.D	Ketua Chairman	13	13	100.00
Medi Sejati	Anggota Member	13	13	100.00
Taufiq Akbar*	Anggota Member	5	5	100.00
Yozef Abdulrachman*	Anggota Member	8	8	100.00

* Per 1 Agustus 2025, telah dilakukan perubahan keanggotaan Komite Pemantau Risiko, di mana Bapak Yozef Abdulrachman tidak lagi menjabat sebagai anggota Komite Pemantau Risiko dan posisinya digantikan oleh Bapak Taufiq Akbar. Perubahan tersebut dilakukan sesuai dengan ketentuan dan keputusan yang berlaku.

As of 1 August 2025, changes were made to the composition of the Audit Committee. Mr. Yozef Abdulrachman no longer served as member of the Audit Committee and his position was replaced by Mr. Taufiq Akbar. These changes were made in accordance with applicable regulations and decisions.

Agenda Rapat Komite Audit

Rapat Komite Audit membahas berbagai agenda, antara lain:

1. Realisasi audit tahun 2024 dan rencana kerja SKAI tahun 2025.
2. Pembahasan hasil komunikasi SKAI dengan Otoritas Jasa Keuangan.
3. Pembahasan *Management Letter* KAP EY Tahun 2024.
4. *Exit meeting* audit oleh KAP EY untuk Laporan Keuangan Bank Periode 31 Desember 2024.
5. Realisasi audit triwulan I 2025 dan pemaparan Departemen Anti-*Fraud* dan *Internal Control over Financial Reporting* (ICOFR).
6. Progres audit posisi Mei 2025.
7. Progres audit posisi Juni 2025.
8. Realisasi audit sampai dengan triwulan II 2025.
9. Realisasi audit posisi Agustus 2025.
10. Progres audit SKAI posisi September 2025, tindak lanjut hasil temuan, dan hal-hal yang menjadi perhatian.
11. Realisasi audit triwulan III 2025, tindak lanjut hasil temuan, dan hal-hal yang menjadi perhatian.
12. *Kick off meeting* audit KAP EY.
13. Progres audit posisi Desember 2025 dan integritas pelaporan keuangan Bank - ICOFR.

Audit Committee's Meeting Agenda

Audit Committee meetings discuss various agenda items, including:

1. Audit realization in 2024 and SKAI work plan for 2025.
2. Discussion of the results of SKAI communication with Financial Services Authority.
3. Discussion of the 2024 KAP EY Management Letter.
4. Exit meeting of audit by KAP EY for the Bank's Financial Statements for the period 31 December 2024.
5. Audit realization for quarter I of 2025 and presentation by Anti-Fraud and Internal Control over Financial Reporting (ICOFR) Department.
6. Audit progress as of May 2025.
7. Audit progress as of June 2025.
8. Audit realization until quarter II of 2025.
9. Audit realization as of August 2025.
10. Progress of SKAI audit as of September 2025, follow-up on findings, and matters of concern.
11. Audit realization for quarter III of 2025, follow-up on findings, and matters of concern.
12. Kick-off meeting of KAP EY audit.
13. Audit progress as of December 2025 and the integrity of the Bank's financial reporting - ICOFR.

Laporan Singkat Pelaksanaan Kegiatan Komite Audit Tahun 2025

Sepanjang tahun 2025, Komite Audit secara konsisten menjalankan berbagai aktivitas sebagai wujud nyata pelaksanaan fungsi, peran, serta tanggung jawab yang diuraikan sebagai berikut:

1. Membuat Laporan Tahunan Komite Audit.
2. Menginikan Piagam dan Tata Tertib Kerja Komite Audit.
3. Melakukan evaluasi pelaksanaan jasa audit oleh KAP EY atas Laporan Keuangan Bank Victoria International Tbk Periode 31 Desember 2024.
4. Me-*review* Laporan Pelaksanaan Pokok-Pokok Hasil Audit Intern Semester I dan II 2025.
5. Membuat rekomendasi Komite Audit kepada Dewan Komisaris atas penunjukkan akuntan publik/kantor akuntan publik untuk jasa audit Laporan Keuangan historis Bank Victoria periode 31 Desember 2025.
6. Melakukan *self-assessment* GCG terkait pelaksanaan fungsi Komite Audit semester II 2024 dan semester I 2025.
7. Menyusun rencana kerja Komite Audit.

Di samping itu, Komite Audit juga melaksanakan penelaahan dan evaluasi melalui analisis laporan serta penyelenggaraan rapat, dengan hasil kajian yang kemudian disampaikan kepada Dewan Komisaris dalam bentuk Memo Internal, antara lain mencakup hal-hal terkait:

1. Melakukan penelaahan atas Laporan Hasil Audit Internal terhadap 5 (lima) objek pemeriksaan (area dan cabang).

Brief Report on Implementation of Audit Committee's Activities in 2025

Throughout 2025, the Audit Committee consistently carried out various activities as concrete manifestation of the implementation of its functions, roles, and responsibilities, as outlined below:

1. Making Audit Committee's Annual Report.
2. Updating Audit Committee Charter.
3. Evaluating the implementation of audit services by KAP EY on the Financial Statements of Bank Victoria International Tbk for the period of 31 December 2024.
4. Reviewing the Implementation Report on the Main Results of Internal Audit for Semester I and II of 2025.
5. Making Audit Committee recommendations to the Board of Commissioners regarding the appointment of public accountant/public accounting firm to audit Bank Victoria's historical Financial Statements for the period of 31 December 2025.
6. Conducting GCG self-assessment regarding the implementation of Audit Committee's functions for Semester II of 2024 and Semester I of 2025.
7. Preparing Audit Committee's work plan.

Furthermore, Audit Committee also conducted assessment and evaluation through report analysis and meeting arrangement, with these review results were then submitted to the Board of Commissioners in form of Internal Memo, covering matters:

1. Reviewing Internal Audit Reports for 5 (five) audited areas and branches.

2. Melakukan penelaahan atas Laporan Hasil Audit Internal terhadap 10 (sepuluh) objek pemeriksaan Unit Kerja Bisnis.
3. Melakukan penelaahan atas Laporan Hasil Audit Internal terhadap 8 (delapan) Unit Kerja Non-Bisnis.
4. Melakukan penelaahan atas Laporan Hasil Audit Internal terhadap 6 (enam) Unit Kerja - mandatori.
5. Melakukan penelaahan Laporan Keuangan dan realisasi pencapaian RBB dan pengendalian internal - triwulanan.
6. Melakukan penelaahan terhadap hasil *review* Unit Kerja Khusus - ICOFR.

Hasil penelaahan Komite Audit telah dituangkan kedalam Memo Internal dan disampaikan kepada Dewan Komisaris.

Pelatihan dan/atau Peningkatan Komite Audit

Pada tahun 2025, anggota Komite Audit turut berpartisipasi dalam program pengembangan kompetensi, yang pelaksanaannya terintegrasi dengan kegiatan pelatihan serta peningkatan kapasitas bagi Dewan Komisaris dan Komite Pemantau Risiko.

2. Reviewing Internal Audit Reports for 10 (ten) audited Business Work Units.
3. Reviewing Internal Audit Reports for 8 (eight) Non-Business Work Units.
4. Reviewing Internal Audit Reports for 6 (six) Work Units - mandatory.
5. Reviewing Financial Statements and the realization of RBB and internal control achievements - quarterly.
6. Reviewing the results of Special Work Unit - ICOFR.

The Audit Committee's review results are outlined in the Internal Memo and submitted to the Board of Commissioners.

Audit Committee's Training and/or Development Programs

In 2025, Audit Committee members participated in competency development program, the implementation of which was integrated with training and capacity building activities for the Board of Commissioners and Risk Monitoring Committee.

Organ Pendukung Dewan Komisaris

Board of Commissioners' Supporting Organ

Sekretaris Dewan Komisaris

Sekretaris Dewan Komisaris ditunjuk oleh Bank untuk mengelola fungsi kesekretariatan dan protokoler, serta mendukung administrasi, perencanaan, dan koordinasi kegiatan Dewan Komisaris. Dengan pertanggungjawaban langsung kepada Dewan Komisaris, peran ini diarahkan untuk menciptakan tata kelola kesekretariatan yang efektif dan efisien guna memastikan kelancaran pelaksanaan tugas Dewan Komisaris.

Tugas dan Tanggung Jawab Sekretaris Dewan Komisaris

Sekretaris Dewan Komisaris menjalankan peran penting dengan lingkup tugas dan tanggung jawab yang mencakup, antara lain:

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.
5. Menjaga kerahasiaan seluruh dokumen yang menurut sifatnya harus dirahasiakan.

Secretary of the Board of Commissioners

Secretary of the Board of Commissioners is appointed by the Bank to manage secretarial and protocol functions, as well as to support the administration, planning, and coordination of the Board of Commissioners' activities. With direct accountability to the Board of Commissioners, this role is directed at creating effective and efficient secretarial governance to ensure the smooth implementation of Board of Commissioners' duties.

Duties and Responsibilities of Board of Commissioners' Secretary

Secretary of the Board of Commissioners plays a crucial role, with scope of duties and responsibilities, including:

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.
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 yang dibentuk oleh Direksi untuk mendukung proses pengambilan keputusan sekaligus menjamin efektivitas penerapan manajemen risiko. Komite Manajemen Risiko berperan dalam merumuskan kebijakan, strategi, dan tujuan pengelolaan risiko, sesuai dengan ketentuan yang ditetapkan melalui Surat Keputusan Direksi No. 019A/SK-DIR/10/23 tanggal 19 Oktober 2023 tentang Pedoman dan Tata Tertib *Risk Management Committee.*

Risk Management Committee

Risk Management Committee is an executive committee established by the Board of Directors to support decision-making process and ensure the effective implementation of risk management. The Risk Management Committee plays a role in formulating risk management policies, strategies, and objectives, in accordance with the provisions stated in Board of Directors' Decision Letter No. 019A/SK-DIR/10/23 dated 19 October 2023 on Charter and Work Guidelines of the Risk Management Committee.

Pedoman Komite Manajemen Risiko

Dalam menjalankan peran dan fungsinya, Komite Manajemen Risiko berlandaskan pada ketentuan regulasi yang berlaku, antara lain Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola bagi Bank Umum, serta Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum.

Risk Management Committee Charter

In carrying out its roles and functions, the Risk Management Committee is guided by applicable regulations, including Financial Services Authority Regulation No. 18/POJK.03/2016 on Risk Management Implementation for Commercial Banks, Financial Services Authority Circular No. 34/SEOJK.03/2016 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 No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks.

Pernyataan Independensi Komite Manajemen Risiko

Komite Manajemen Risiko melaksanakan tugas dan tanggung jawabnya dengan menjunjung tinggi prinsip independensi. Setiap keputusan diambil secara objektif, tanpa pengaruh atau intervensi dari pihak manapun, sehingga dapat meminimalkan potensi benturan kepentingan serta melindungi kepentingan dan keberlanjutan usaha Bank.

Statement of Independence of Risk Management Committee

Risk Management Committee carries out its duties and responsibilities by upholding the principle of independence. Every decision is made objectively, without influence or intervention from any party, thereby minimizing potential conflicts of interest and protecting the interests and sustainability of the Bank's business.

Wewenang, Tanggung Jawab, dan Tugas serta Realisasi Pelaksanaan Tugas Komite Manajemen Risiko

Uraian mengenai kewenangan, tanggung jawab serta tugas, dan pelaksanaan tugas Komite Manajemen Risiko sepanjang tahun 2025 sebagai berikut:

1. Wewenang dan tanggung jawab:
    a. 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.
    b. 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.
    c. Menetapkan hal-hal terkait dengan keputusan bisnis yang menyimpang dari prosedur normal, seperti pelampauan ekspansi usaha yang signifikan dibandingkan dengan rencana bisnis yang telah ditetapkan sebelumnya atau pengambilan posisi/eksposur risiko yang melampaui limit yang telah ditetapkan.
    d. Menyusun dan menyetujui *recovery plan* yang merupakan pedoman bagi Bank dalam mengelola risiko dan modal dalam kondisi krisis agar dapat ditanggulangi secara cepat dan tepat.
2. Tugas dan realisasi:
    a. Melakukan pengembangan atas penerapan budaya risiko untuk setiap jenjang organisasi.

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

Description of authority, responsibilities, and duty implementation of the Risk Management Committee throughout 2025 is as follows:

1. Authorities and responsibilities:
    a. Preparing and approving policies, strategies, and charter for implementing the Bank's risk management, including strategy framework, methodology, system, and risk management tools including contingency plans and ensuring their implementation covering all types of risks.
    b. 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.
    c. Determining matters related to business decisions that deviate from normal procedures, such as significant excess of business expansion compared to the established business plan or taking a position/risk exposure that exceeds the established limits.
    d. Preparing and approving recovery plan that is the charter for the Bank in managing risk and capital in crisis condition so that it can be handled quickly and appropriately.
2. Duties and realizations:
    a. Developing the implementation of risk culture for each organizational level.

b. 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.
c. Mengevaluasi arah, strategi, dan program manajemen risiko.
d. Memantau implementasi Kebijakan dan Pedoman Umum Penerapan Manajemen Risiko.
e. Memantau posisi risiko secara komprehensif, melakukan *stress testing* dan *back testing*.
f. Mengkaji proses manajemen risiko secara berkala.
g. Mengkaji usulan aktivitas/produk baru.
h. Melakukan pengungkapan manajemen risiko yang mencakup kinerja dan arah kebijakan manajemen risiko.
i. Mengevaluasi *recovery plan* secara berkala.
j. Menyetujui langkah-langkah perbaikan untuk mengatasi masalah risiko yang menjadi perhatian regulator.

b. Evaluating and adjusting the Risk Management Policy and General Guidelines with authority policies to regulatory policies, which are adjusted to the Bank's business size and complexity and the risks inherent in the Bank.
c. Evaluating risk management direction, strategy, and program.
d. Monitoring the implementation of Risk Management Policy and General Guidelines.
e. Monitoring the risk position comprehensively, conducting stress testing and back testing.
f. Reviewing the risk management process periodically.
g. Reviewing any proposed new activities/products.
h. Conducting risk management disclosure that includes performance and policy direction of risk management.
i. Evaluating recovery plans periodically.
j. Approving corrective measures to address risk issues that are of concern to regulators.

Struktur dan Keanggotaan Komite Manajemen Risiko

Komite Manajemen Risiko dibentuk dengan komposisi yang mencakup mayoritas anggota Direksi sebagai anggota tetap serta didukung oleh anggota tidak tetap dari jajaran Pejabat Eksekutif Bank. Penetapan susunan keanggotaan dilakukan oleh Direktur Utama dengan mempertimbangkan tingkat eksposur risiko yang dihadapi Bank. Struktur keanggotaan tersebut telah disahkan melalui Keputusan Direksi No. 020/SK-DIR/01/24 tanggal 24 Januari 2024 tentang Perubahan Penunjukan Susunan Anggota Komite Manajemen Risiko PT Bank Victoria Internasional Tbk, dengan rincian 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, Kepala Divisi IT, Kepala Divisi *Treasury*, Kepala Divisi *Operation & Internal Control*, Kepala Divisi *Finance and Accounting*, Kepala Divisi CMO, dan Kepala Divisi *Compliance, System Procedure & Customer Protection*.
6. Undangan Tidak Tetap diisi oleh pihak internal dan eksternal yang diundang.

Structure and Composition of Risk Management Committee

Risk Management Committee is established with a composition that includes a majority of the Board of Directors as permanent members, supported by non-permanent members from the Bank's Executive Officers. The composition is determined by President Director, by considering the level of risk exposure faced by the Bank. This structure has been approved through Board of Directors' Decision No. 020/SK-DIR/01/24 dated 24 January 2024 on Changes in the Appointment of Members of Risk Management Committee of PT Bank Victoria Internasional Tbk, with the following details:

1. Chairman held by the President Director.
2. Vice Chairman 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 Invitation for Members filled in by Head of SKAI 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, and Head of Compliance, System Procedure & Customer Protection Division.
6. Non-Permanent Invitation filled in by invited internal and external parties.

Rapat Komite Manajemen Risiko

Berdasarkan Surat Keputusan Direksi No. 019A/SK-DIR/10/23 tanggal 19 Oktober 2023 tentang Pedoman dan Tata Tertib Risk Management Committee, komite diwajibkan menyelenggarakan rapat sekurang-kurangnya sekali

Risk Management Committee's Meeting

Based on the Board of Directors' Decision Letter No. 019A/SK-DIR/10/23 dated 19 October 2023 on Charter and Work Guidelines of the Risk Management Committee, the committee is required to hold meetings at least once dalam setiap 3 (tiga) bulan. Rapat dinyatakan sah apabila dihadiri oleh minimal 51% anggota tetap. Sepanjang tahun 2025, Komite Manajemen Risiko telah menyelenggarakan rapat sebanyak 11 (sebelas) kali dengan tingkat partisipasi kehadiran sebesar 75,40%.

every 3 (three) months. A meeting is deemed valid if attended by at least 51% of the permanent members. Throughout 2025, Risk Management Committee held 11 (eleven) meetings with a participation rate of 75.40%.

Assets and Liability Committee

Assets and Liabilities Committee (ALCO) merupakan komite eksekutif yang dibentuk untuk membantu Direksi dalam menjaga keseimbangan antara aset dan liabilitas Bank. Melalui fungsi pengawasan dan pengambilan keputusan strategis, ALCO berperan dalam memastikan likuiditas tetap terjaga, risiko dapat dikendalikan, serta kinerja keuangan Bank dapat dioptimalkan secara berkelanjutan.

Pedoman ALCO

Pelaksanaan tugas dan tanggung jawab ALCO didasarkan pada ketentuan yang tertuang dalam Surat Keputusan Direksi No. 007/SK-DIR/02/25 tentang Pedoman dan Tata Tertib Kerja *Assets & Liabilities Committee* (ALCO), yang menjadi acuan utama dalam menjalankan fungsi dan perannya.

Pernyataan Independensi ALCO

Dalam menjalankan fungsi dan kewenangannya, seluruh anggota ALCO berkomitmen untuk menjaga independensi serta objektivitas. Setiap keputusan diambil secara profesional guna mencegah terjadinya potensi benturan kepentingan dan memastikan perlindungan terhadap kepentingan serta keberlanjutan usaha Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas ALCO

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas ALCO sepanjang tahun 2025 sebagai berikut:

1. Memantau dan memperhatikan struktur neraca dan memaksimumkan 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.
6. Memantau dan memperhatikan perkembangan kondisi ekonomi mikro maupun makro, seperti inflasi, nilai tukar, dan perkembangan suku bunga yang dapat memengaruhi kinerja Bank.

Assets and Liability Committee

Assets and Liabilities Committee (ALCO) is an executive committee established to assist the Board of Directors in maintaining a balance between the Bank's assets and liabilities. Through its oversight and strategic decision-making functions, ALCO plays a role in ensuring liquidity is maintained, risks are managed, and the Bank's financial performance is optimized on a sustainable basis.

ALCO Charter

The implementation of ALCO duties and responsibilities is based on the provisions stated in the Board of Directors' Decision Letter No. 007/SK-DIR/02/25 on Charter and Work Guidelines of Assets & Liabilities Committee (ALCO), which serve as the primary reference in performing its functions and roles.

Statement of Independency of ALCO

In carrying out its functions and authorities, all ALCO members are committed to maintaining independence and objectivity. Every decision is made professionally to prevent potential conflicts of interest and ensure the protection of the Bank's interests and business sustainability.

Duties, Responsibilities, and the Realization of ALCO Duties

Description of responsibilities, duties, and duty implementation of ALCO throughout 2025 is as follows:

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.
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.

Struktur dan Keanggotaan ALCO

Struktur keanggotaan ALCO Bank Victoria ditetapkan melalui Surat Keputusan Direksi No. 008/SK-DIR/02/25 tentang tentang Perubahan Susunan Anggota Assets and Liabilities Committee (ALCO) PT Bank Victoria International Tbk, dengan rincian sebagai berikut:

1. Ketua diisi oleh Direktur Utama.
2. Wakil Ketua diisi oleh Wakil Direktur Utama.
3. Sekretaris merangkap anggota diisi oleh Kepala Divisi *Treasury*.
4. Sekretriat diisi oleh Divisi *Treasury*.
5. Anggota diisi oleh seluruh Direksi, seluruh *Senior Executive Vice President*, Kepala Divisi Direktorat Bisnis, Kepala Divisi *Branch Banking*, Kepala Divisi *Risk Management,* dan Kepala Divisi *Finance and Accounting*.
6. Selain Anggota tersebut di atas, ALCO dapat mengundang Kepala Divisi lain untuk menghadiri rapat ALCO sesuai dengan topik yang dibahas pada rapat tersebut.

Structure and Composition of ALCO

The structure of ALCO of Bank Victoria is established through the Board of Directors' Decision Letter No. 008/SK-DIR/02/25 on Changes to the Composition of Assets and Liabilities Committee (ALCO) of PT Bank Victoria International Tbk, with the following details:

1. Chairman held by President Director.
2. Vice Chairman held by the Deputy President Director.
3. Secretary concurrently as member held by the Head of Treasury Division.
4. Secretariat held by the Treasury Division.
5. Members held by all Board of Directors, all Senior Executive Vice Presidents, Head of Business Directorate Division, Head of Branch Banking Division, Head of Risk Management Division, and Head of Finance and Accounting Division.
6. In addition to the aforementioned members, ALCO may invite other Division Heads to attend ALCO meetings based on the topics discussed at the meeting.

Rapat ALCO

Mengacu pada Pedoman Kerja ALCO, komite ini diwajibkan menyelenggarakan rapat secara rutin paling sedikit sekali setiap bulan serta dapat mengadakan rapat insidental sesuai kebutuhan. Rapat dinyatakan sah apabila dihadiri oleh sekurang-kurangnya 50% dari jajaran Direksi, tidak termasuk Direktur Kepatuhan dan Manajemen Risiko. Sepanjang tahun 2025, ALCO telah melaksanakan rapat sebanyak 19 (sembilan belas) kali dengan tingkat kehadiran sebesar 90,83%.

ALCO's Meeting

Referring to ALCO Charter, this committee is required to hold regular meetings at least once a month and can hold incidental meetings as necessary. A meeting is deemed valid if attended by at least 50% of the Board of Directors, excluding Director of Compliance and Risk Management. Throughout 2025, ALCO held 19 (nineteen) meetings with an attendance rate of 90.83%.

Komite Kredit

Komite Kredit merupakan komite yang berperan mendukung pengelolaan aktivitas perkreditan Bank, khususnya dalam memastikan pemberian kredit sesuai dengan limit dan ketentuan yang berlaku. Komite ini bertanggung jawab untuk menelaah, mengevaluasi, serta memberikan persetujuan atas keputusan kredit, sehingga kualitas portofolio kredit Bank tetap terjaga secara sehat dan berkesinambungan.

Credit Committee

Credit Committee is a committee that supports the management of the Bank's credit activities, specifically ensuring that lending complies with applicable limits and regulations. This committee is responsible for reviewing, evaluating, and approving credit decisions, ensuring the quality of the Bank's credit portfolio remains healthy and sustainable.

Pedoman Komite Kredit

Pelaksanaan tugas dan tanggung jawab Komite Kredit berlandaskan pada ketentuan yang ditetapkan dalam Surat Keputusan Direksi No. 014/SK-DIR/01/24 tanggal 18 Januari 2024 tentang Pedoman dan Tata Tertib Kerja Komite Kredit, yang menjadi acuan utama dalam menjalankan fungsi serta wewenangnya.

Credit Committee Charter

Duties and responsibilities of Credit Committee are carried out based on the provisions stipulated in the Board of Directors' Decision Letter No. 014/SK-DIR/01/24 dated 18 January 2024 on Charter and Work Guidelines of Credit Committee, which serve as the primary reference in performing its functions and authorities.

Pernyataan Independensi Komite Kredit

Dalam menjalankan perannya, setiap anggota Komite Kredit berkomitmen untuk menjunjung tinggi prinsip independensi dan profesionalisme. Sikap tersebut diterapkan guna memastikan seluruh keputusan kredit diambil secara objektif, terhindar dari potensi benturan kepentingan, serta mampu melindungi kepentingan dan keberlangsungan usaha Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Kredit

Tugas dan tanggung jawab serta realisasi pelaksanaan tugas dari Komite Kredit di tahun 2025 adalah memberikan persetujuan/penolakan terhadap usulan fasilitas penyediaan dana dari masing-masing divisi/unit pengusul.

Struktur dan Keanggotaan Komite Kredit

Struktur keanggotaan Komite Kredit ditetapkan melalui Surat Keputusan Direksi No. 014/SK-DIR/01/24 tanggal 18 Januari 2024, dengan rincian susunan anggota sebagai berikut:

1. Ketua diisi oleh Wakil Direktur Utama.
2. Wakil Ketua diisi oleh Direktur Bisnis.
3. Sekretaris merangkap Anggota diisi oleh Kepala Divisi *Credit Risk Review*.
4. Anggota diisi oleh Direktur Utama, Direktur Keuangan, *SEVP of Operation & International Banking*, Kepala Divisi *SME & Consumer Banking*, Kepala Divisi *Commercial Banking*, Kepala Divisi *Special Asset Management*, Kepala Divisi *Credit Legal*, Kepala Divisi *Loan & Trade Operation, Credit Monitoring & Collection Vice Division Head, Business Linkage Department Head,* dan *Consumer Department Head.*
5. Undangan Tetap diisi oleh Direktur Kepatuhan dan Manajemen Risiko, Kepala Divisi *International Banking*, Kepala Divisi *Treasury*, dan Kepala Divisi *Compliance, System Procedure & Coordinator Customer Protection*.

Rapat Komite Kredit

Berdasarkan Pedoman Kerja Komite Kredit, rapat Komite Kredit wajib diselenggarakan paling sedikit sekali setiap minggu dan dapat dilakukan secara insidental sesuai kebutuhan. Setiap keputusan rapat hanya dapat diambil apabila memenuhi syarat kuorum serta disepakati secara bulat oleh seluruh anggota pemutus. Apabila terjadi perbedaan pendapat, maka pengajuan kredit dinyatakan tidak disetujui. Sepanjang tahun 2025, Komite Kredit telah melaksanakan rapat sebanyak 90 (sembilan puluh) kali dengan tingkat kehadiran sebesar 100,00%.

Statement of Independence of Credit Committee

In carrying out their roles, every member of Credit Committee is committed to upholding the principles of independence and professionalism. Such stance is implemented to ensure that all credit decisions are made objectively, free from potential conflicts of interest, and capable to protect the interests and business continuity of the Bank.

Duties, Responsibilities, and the Realization of Credit Committee Duties

Duties and responsibilities as well as realization of Credit Committee's duties in 2025 were to approve/reject proposed funding facilities from each proposing division/unit.

Structure and Composition of Credit Committee

The structure of Credit Committee is established through the Board of Directors' Decision Letter No. 014/SK-DIR/01/24 dated 18 January 2024 with the following composition details:

1. Chairman held by Deputy President Director.
2. Vice Chairman held by Director of Business.
3. Secretary concurrently as Member held by the Head of Credit Risk Review Division.
4. Members held by President Director, Director of Finance, SEVP of Operation & International Banking, Head of SME & Consumer Banking Division, Head of Commercial Banking Division, Head of Special Asset Management Division, Head of Credit Legal Division, Head of Loan & Trade Operation Division, Credit Monitoring & Collection Vice Division Head, Business Linkage Department Head, and Consumer Department Head.
5. Permanent Invitation filled in by Director of Compliance and Risk Management, Head of International Banking Division, Treasury Division Head, and Head of Compliance, System Procedure & Coordinator Customer Protection Division.

Credit Committee Meeting

Based on Credit Committee Charter, meetings of Credit Committee shall be held at least once a week and can be held incidentally as necessary. Each meeting decision can only be made if the quorum requirement is met and unanimously agreed upon by all members. In the event of dissenting opinion, the credit application will be deemed unapproved. Throughout 2025, Credit Committee held 90 (ninety) times meetings with an attendance rate of 100.00%.

Komite Kebijakan Perkreditan

Komite Kebijakan Perkreditan dibentuk oleh Direksi sebagai wadah strategis dalam merumuskan kebijakan kredit yang *prudent*. Komite ini berperan dalam mengawasi implementasi kebijakan, menilai konsistensi penerapannya, serta memastikan prinsip kehati-hatian dijalankan secara menyeluruh. Selain itu, Komite Kebijakan Perkreditan turut melakukan pemantauan atas kondisi portofolio kredit dan memberikan rekomendasi perbaikan guna mendukung kualitas serta keberlanjutan usaha Bank.

Pedoman Komite Kebijakan Perkreditan

Dalam melaksanakan tugas dan tanggung jawabnya, 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. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum.

Pernyataan Independensi Komite Kebijakan Perkreditan

Dalam melaksanakan fungsi dan tanggung jawabnya, anggota Komite Kebijakan Perkreditan berpegang pada prinsip independensi dan profesionalisme. Setiap keputusan diambil secara objektif untuk memastikan pengelolaan kebijakan kredit terbebas dari potensi benturan kepentingan serta tetap berorientasi pada perlindungan kepentingan dan keberlanjutan usaha Bank.

Wewenang, Tanggung Jawab, dan Tugas serta Realisasi Pelaksanaan Tugas Komite Kebijakan Perkreditan

Uraian mengenai kewenangan, tanggung jawab serta tugas, dan pelaksanaan tugas Komite Kebijakan Perkreditan sepanjang tahun 2025 sebagai berikut:

1. Wewenang dan tanggung jawab:
    a. Memastikan kebijakan perkreditan Bank dan seluruh peraturan pelaksanaannya sesuai dengan peraturan perundang-undangan dan regulasi yang berlaku.
    b. Memberikan usulan dan rekomendasi terkait aspek perkreditan, termasuk target *market, negative list*, sektor usaha yang harus dihindari, serta maksimum portofolio kredit per sektor usaha.
    c. Memberikan masukan kepada Direksi dalam penyusunan kebijakan perkreditan Bank.
    d. Melakukan evaluasi berkala terhadap kualitas kredit Bank serta memberikan saran perbaikan dan penyempurnaan proses kredit, baik secara rutin maupun insidental akibat perubahan kondisi eksternal dan internal.

Credit Policy Committee

Credit Policy Committee is established by the Board of Directors as a strategic forum for formulating prudent credit policies. This committee plays a role in overseeing policy implementation, assessing the consistency of its application, and ensuring that prudent principles are comprehensively implemented. Furthermore, Credit Policy Committee also monitors the condition of credit portfolio and provides recommendations for improvements to support the quality and sustainability of the Bank's business.

Credit Policy Committee Charter

In performing its duties and responsibilities, the Credit Policy Committee refers to Financial Services Authority Regulation No. 42/POJK.03/2017 on Obligation for Compilation and Implementation of Bank Credit or Financing Policies for Commercial Banks, Financial Services Authority Regulation No. 17 of 2023 on Governance for Commercial Banks, and Financial Services Authority Circular No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks.

Statement of Independence of Credit Policy Committee

In carrying out their functions and responsibilities, members of Credit Policy Committee adhere to the principles of independence and professionalism. Every decision is made objectively to ensure that credit policy management is free from any potential conflicts of interest and remains oriented towards protecting the interests and sustainability of the Bank's business.

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

Description of authority, responsibilities, and duty implementation of the Credit Policy Committee throughout 2025 is as follows:

1. Authorities and responsibilities:
    a. Ensuring that the Bank's credit policy and all implementing regulations are in accordance with applicable laws and regulations.
    b. Providing proposals and recommendations related to credit aspects, including target market, negative list, business sector to avoid, and maximum credit portfolio per business sector.
    c. Providing input to the Board of Directors in preparing the Bank's credit policy.
    d. Periodically evaluating the Bank's credit quality and providing suggestions for improvements and refinements to the credit process, both routinely and incidentally due to changes in external and internal conditions.

2. Tugas dan realisasi:
   a. Mengawasi penerapan memastikan kebijakan perkreditan Bank dan standar operasional prosedur perkreditan agar dijalankan secara konsisten oleh organisasi perkreditan Bank.
   b. Melakukan kajian terhadap kebijakan perkreditan Bank dan standar operasional prosedur perkreditan jika ditemukan hambatan dalam implementasi berdasarkan hasil pemantauan dan pengawasan Komite Kebijakan Perkreditan.
   c. Memberikan usulan dan/atau saran perbaikan terhadap kebijakan perkreditan Bank dan standar operasional prosedur perkreditan jika diperlukan perubahan atau penyempurnaan.
   d. Memantau dan mengevaluasi berbagai aspek perkreditan, termasuk perkembangan dan kualitas portofolio kredit Bank, kebenaran kewenangan dalam memutus kredit bank, strategi pengelolaan kredit, kepatuhan terhadap ketentuan BMPK dan regulasi lainnya, pencapaian target *market* kredit serta pembiayaan sektor industri dengan mempertimbangkan tren pasar dan ekonomi, penyelesaian kredit bermasalah dan pembentukan CKPN.
   e. Menyampaikan laporan tertulis kepada Direksi terkait perkembangan dan perbaikan kebijakan perkreditan Bank dan standar operasional prosedur perkreditan yang diusulkan oleh Komite Kebijakan Perkreditan.

Struktur dan Keanggotaan Komite Kebijakan Perkreditan

Struktur keanggotaan Komite Kebijakan Perkreditan telah ditetapkan berdasarkan Surat Keputusan Direksi No. 021/SK-DIR/01/24 tanggal 24 Januari 2024, dengan rincian susunan anggota sebagai berikut:

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.*
5. Anggota diisi oleh Direktur Keuangan; Direktur Kepatuhan dan Manajemen Risiko; *Senior EVP* Bisnis; Senior EVP Operasional & *International Banking*, Kepala Divisi SME & *Consumer Banking*; 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*; Kepala Divisi *International Banking*; Wakil Kepala Divisi *Credit Monitoring & Collection*; dan Kepala Divisi *Compliance, System Procedure & Customer Protection.*

2. Duties and realizations:
   a. Overseeing the implementation by ensuring that the Bank's credit policies and credit standard operating procedures are carried out consistently by the Bank's credit organization.
   b. Reviewing the Bank's credit policies and credit standard operating procedures if obstacles are found in implementation based on the monitoring and supervision results by the Credit Policy Committee.
   c. Providing proposals and/or suggestions for improvements to the Bank's credit policies and credit standard operating procedures if changes or refinements are needed.
   d. Monitoring and evaluating various aspects of credit, including the development and quality of the Bank's credit portfolio, the correctness of authority in deciding on bank credit, credit management strategies, compliance with LLL provisions and other regulations, achievement of credit market targets and financing of industrial sector by considering market and economic trends, settlement of problematic credit and the formation of CKPN.
   e. Submitting written report to the Board of Directors regarding the development and improvement of the Bank's credit policy and credit standard operating procedures proposed by Credit Policy Committee.

Structure and Composition of Credit Policy Committee

The structure of Credit Policy Committee is determined based on the Board of Directors' Decision Letter No. 021/SK-DIR/01/24 dated 24 January 2024, with the following composition details:

1. Chairman held by President Director.
2. Vice Chairman I concurrently as Member held by Deputy President Director.
3. Vice Chairman II concurrently as Member held by Business Director.
4. Secretary concurrently as Member held by Head of Risk Management Division.
5. Members held by the Director of Finance; Director of Compliance and Risk Management; Senior EVP Business; Senior EVP Operations & International Banking; Head of SME & Consumer Banking 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; Credit Monitoring & Collection Vice Division Head; and Head of Compliance, System Procedure & Customer Protection Division.

6. Undangan Tetap diisi oleh Kepala Divisi SKAI, Kepala Divisi *Corporate Legal*, Kepala Divisi *Treasury*, dan Kepala Divisi *Accounting*.
7. Undangan Tidak Tetap diisi oleh pihak internal dan eksternal yang diundang.

Rapat Komite Kebijakan Perkreditan

Berdasarkan Surat Keputusan Direksi No. 006/SK-DIR/01/24 tanggal 9 Januari 2026, Komite Kebijakan Perkreditan diwajibkan menyelenggarakan rapat baik secara berkala maupun insidental sesuai kebutuhan. Rapat dinyatakan sah apabila dihadiri sedikitnya 50% dari jajaran Direksi serta 50% dari anggota non-Direksi. Sepanjang tahun 2025, Komite Kebijakan Perkreditan telah mengadakan rapat sebanyak 7 (tujuh) kali dengan tingkat kehadiran mencapai 80,88%.

6. Permanent Invitation filled in by Head of SKAI Division, Head of Corporate Legal Division, Head of Treasury Division, and Head of Accounting Division.
7. Non-Permanent Invitation filled in by invited internal and external parties.

Credit Policy Committee's Meeting

Based on the Board of Directors' Decision Letter No. 006/SK-DIR/01/24 dated 9 January 2026, Credit Policy Committee is required to hold meetings, both periodically and incidentally as necessary. A meeting is deemed valid if attended by at least 50% of the Board of Directors and 50% of non-Board of Directors members. Throughout 2025, Credit Policy Committee held 7 (seven) meetings with an attendance rate of 80.88%.

Komite Pengarah Teknologi Informasi

Komite Pengarah Teknologi Informasi dibentuk sebagai komite yang bertugas memastikan pengelolaan teknologi informasi berjalan sejalan dengan arah bisnis dan strategi Bank. Komite ini berperan dalam memberikan masukan dan rekomendasi terkait pengembangan serta pengelolaan sistem informasi, sekaligus mengawasi kesiapan infrastruktur teknologi agar dapat mendukung efektivitas operasional dan pencapaian kinerja Bank secara optimal.

Information Technology Steering Committee

The Information Technology Steering Committee is established to ensure that the management of information technology is in line with the Bank's business direction and strategy. This committee plays a role in providing input and recommendations on the development and management of information systems, while also overseeing the readiness of technology infrastructure to support operational effectiveness and optimal achievement of the Bank's performance.

Pedoman Komite Pengarah Teknologi Informasi

Dalam menjalankan peran dan tanggung jawabnya, Komite Pengarah Teknologi Informasi berpedoman pada ketentuan Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2022 tanggal 6 Juli 2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum, yang menjadi acuan utama dalam penerapan tata kelola serta pengelolaan teknologi informasi di Bank.

Information Technology Steering Committee Charter

In performing its roles and responsibilities, the Information Technology Steering Committee is guided by the provision of Financial Services Authority Regulation No. 11/POJK.03/2022 dated 6 July 2022 on Information Technology Operations by Commercial Banks, that serves as the primary reference for implementing information technology governance and management at the Bank.

Pernyataan Independensi Komite Pengarah Teknologi Informasi

Setiap anggota Komite Pengarah Teknologi Informasi melaksanakan tugas dan tanggung jawabnya dengan menjunjung tinggi prinsip independensi dan objektivitas. Sikap tersebut diterapkan untuk memastikan seluruh keputusan yang diambil bebas dari potensi benturan kepentingan serta tetap berorientasi pada perlindungan kepentingan Bank dan keberlanjutan operasionalnya.

Statement of Independence of Information Technology Steering Committee

Every member of the Information Technology Steering Committee carries out duties and responsibilities by upholding the principles of independence and objectivity. Such stance is implemented to ensure that all decisions are free from potential conflicts of interest and remain oriented toward protecting the Bank's interests and sustainability of its operations.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Pengarah Teknologi Informasi

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas Komite Pengarah Teknologi Informasi sepanjang tahun 2025 sebagai berikut:

1. Memastikan rencana strategis teknologi informasi selaras dengan rencana korporasi Bank.
2. Memastikan kebijakan, standar, dan 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. Memantau kesesuaian antara rencana pengembangan teknologi informasi dengan rencana strategis teknologi informasi.
4. Memastikan kesesuaian antara pelaksanaan pengembangan teknologi informasi dengan rencana yang telah ditetapkan.
5. Mengevaluasi efektivitas biaya teknologi informasi dalam kaitannya dengan pencapaian manfaat yang telah direncanakan.
6. Memantau kinerja teknologi informasi serta upaya peningkatan performanya.
7. Menyelesaikan permasalahan teknologi informasi yang tidak dapat diselesaikan oleh satuan kerja pengguna dan penyelenggara, dengan cara yang efektif, efisien, dan tepat waktu.
8. Menilai kecukupan dan alokasi sumber daya teknologi informasi yang dimiliki Bank.
9. Memastikan langkah-langkah mitigasi risiko atas investasi teknologi informasi, agar investasi tersebut memberikan kontribusi terhadap pencapaian tujuan bisnis Bank.
10. Memastikan kesesuaian pelaksanaan proyek teknologi informasi dengan rencana proyek yang disepakati (*project charter*) dalam *Service Level Agreement* (SLA).
11. Memastikan kesesuaian pelaksanaan proyek teknologi informasi sesuai dengan kebutuhan sistem informasi manajemen serta kebutuhan kegiatan usaha Bank.
12. Memastikan strategi dan rencana teknologi informasi telah memiliki serta didukung standar operasional prosedur yang memadai.
13. Memastikan penerapan standar operasional prosedur teknologi informasi secara konsisten dan benar.

Duties, Responsibilities, and the Realization of Information Technology Steering Committee Duties

Description of responsibilities, duties, and duty implementation of Information Technology Steering Committee throughout 2025 is as follows:

1. Ensuring that the information technology strategic plan is in line with the Bank's corporate plan.
2. Ensuring that information technology policies, standards, and procedures comply with Financial Services Authority Regulation No. 11/POJK.03/2022 dated 6 July 2022 on Information Technology Operations by Commercial Banks.
3. Monitoring the conformity between information technology development plan and information technology strategic plan.
4. Ensuring conformity between the implementation of information technology development and the established plan.
5. Evaluating the effectiveness of information technology costs in relation to achieving planned benefits.
6. Monitoring the performance of information technology and its efforts to improve the performance.
7. Resolving information technology problems unable to be resolved by user and organizing work units, in an effective, efficient, and timely manner.
8. Assessing the adequacy and allocation of information technology resources owned by the Bank.
9. Ensuring risk mitigation measures for information technology investments, so that these investments contribute to achieving the Bank's business objectives.
10. Ensuring the conformity of information technology project implementation with the project charter agreed in the Service Level Agreement (SLA).
11. Ensuring the conformity of information technology project implementation in line with the needs of management information system and the needs of the Bank's business activities.
12. Ensuring that information technology strategies and plans have and are supported by adequate standard operating procedures.
13. Ensuring the implementation of standard operating procedures for information technology in a consistent and correct manner.

Struktur dan Keanggotaan Komite Pengarah Teknologi Informasi

Struktur keanggotaan Komite Pengarah Teknologi Informasi telah ditetapkan melalui Surat Keputusan Direksi No. 022/SK-DIR/01/24 tanggal 24 Januari 2024, dengan susunan anggota sebagai berikut:

1. Ketua diisi oleh Direktur Utama.
2. Wakil Ketua diisi oleh Wakil Direktur Utama.

Structure and Composition of Information Technology Steering Committee

The structure of Information Technology Steering Committee has been established through the Board of Directors' Decision Letter No. 022/SK-DIR/01/24 dated 24 January 2024 with the composition as follows:

1. Chairman held by President Director.
2. Vice Chairman held by Deputy President Director.

3. Sekretaris diisi oleh Kepala Divisi *Information Technology*.
4. Anggota Tetap diisi oleh Direktur Keuangan; Direktur Bisnis; Direktur Kepatuhan dan Manajemen Risiko; *Senior Executive Vice President of Change Management Office; Senior Executive Vice President of Business; Senior Executive Vice President of Finance, Accounting & MIS; Senior Executive Vice President of Operations & International Banking;* Kepala Divisi *Risk Management;* Kepala Divisi *Change Management Office*; dan Kepala Divisi *HCM & General Affairs*.
5. Undangan Tetap diisi oleh Kepala Divisi SKAI, Wakil Kepala Divisi General Affair, Kepala Divisi Accounting, dan Kepala Divisi *Branch Banking Network & Digital Sales*.

Rapat Komite Pengarah Teknologi Informasi

Berdasarkan Surat Keputusan Direksi No. 022A/SK-DIR/01/24 tanggal 24 Januari 2024 tentang Pedoman dan Tata Tertib Kerja Komite Pengarah Teknologi Informasi, komite diwajibkan menyelenggarakan rapat secara berkala sedikitnya sekali setiap 3 (tiga) bulan atau sewaktu-waktu sesuai kebutuhan Bank. Rapat dinyatakan sah apabila dihadiri oleh minimal 2 (dua) anggota Direksi serta 50% + 1 (satu) dari anggota. Sepanjang tahun 2025, Komite Pengarah Teknologi Informasi telah melaksanakan 4 (empat) kali rapat dengan tingkat kehadiran mencapai 90,00%.

Komite Pemantau dan Pelaksanaan GCG

Komite Pemantau dan Pelaksanaan GCG berperan dalam mendukung Direksi untuk merumuskan, menyosialisasikan, dan mengawasi penerapan GCG, kode etik, sistem pengendalian internal, serta strategi pencegahan *fraud*. Selain itu, komite ini juga bertanggung jawab memastikan kepatuhan terhadap prinsip-prinsip tersebut dengan mengambil langkah perbaikan yang diperlukan guna memperkuat integritas dan efektivitas tata kelola Bank.

Pedoman Komite Pemantau dan Pelaksanaan GCG

Pelaksanaan tugas dan tanggung jawab Komite Pemantau dan Pelaksanaan GCG berlandaskan pada ketentuan yang diatur dalam Surat Keputusan Direksi No. 022/SK-DIR/07/24 tanggal 31 Juli 2024 tentang Pedoman dan Tata Tertib Kerja Komite Pemantau dan Pelaksanaan Good Corporate Governance (GCG), yang menjadi acuan dalam menjalankan peran serta fungsinya.

3. Secretary held by Head of Information Technology Division;
4. Permanent Members held by Director of Finance; Director of Business; Director of Compliance and Risk Management; Senior Executive Vice President of Change Management Office; Senior Executive Vice President of Business; Senior Executive Vice President of Finance, Accounting & MIS; Senior Executive Vice President of Operations & International Banking; Head of Risk Management Division; Head of Change Management Office Division; and Head of HCM & General Affairs Division.
5. Permanent Invitation filled in by Head of SKAI Division, General Affairs Vice Division Head, Head of Accounting Division, and Head of Branch Banking Network.

Information Technology Steering Committee's Meeting

Based on the Board of Directors' Decision Letter No. 022A/SK-DIR/01/24 dated 24 January 2024 on the Charter and Work Guidelines of Information Technology Steering Committee, the committee is required to hold regular meetings at least once every 3 (three) months or as necessary according to the Bank's needs. A meeting is deemed valid if attended by at least 2 (two) members of the Board of Directors and 50% + 1 (one) of the members. Throughout 2025, the Information Technology Steering Committee held 4 (four) meetings with an attendance rate of 90.00%.

GCG Implementation and Monitoring Committee

GCG Implementation and Monitoring Committee plays a role in supporting the Board of Directors in formulating, disseminating information, and overseeing GCG implementation, code of conduct, internal control system, and fraud prevention strategies. Furthermore, this committee is also responsible for ensuring compliance with these principles by taking necessary corrective measures to strengthen the integrity and effectiveness of the Bank's governance.

GCG Implementation and Monitoring Committee Charter

The implementation of duties and responsibilities of GCG Implementation and Monitoring Committee is based on the provisions stipulated in Board of Directors' Decision Letter No. 022/SK-DIR/07/24 dated 31 July 2024 on Charter of the Good Corporate Governance (GCG) Implementation and Monitoring Committee, which serve as a reference in performing its roles and functions.

Pernyataan Independensi Komite Pemantau dan Pelaksanaan GCG

Setiap anggota Komite Pemantau dan Pelaksanaan GCG melaksanakan tugas dan tanggung jawabnya dengan menjunjung tinggi prinsip independensi dan integritas. Hal ini dilakukan untuk memastikan seluruh keputusan diambil secara objektif, bebas dari potensi benturan kepentingan, serta tetap berfokus pada perlindungan kepentingan dan keberlanjutan usaha Bank.

Statement of Independence of GCG Implementation and Monitoring Committee

Every member of GCG Implementation and Monitoring Committee carries out duties and responsibilities by upholding the principles of independence and integrity. This is carried out to ensure that all decisions are made objectively, free from potential conflicts of interest, and remain focused on protecting the interests and sustainability of the Bank's business.

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

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas Komite Pemantau dan Pelaksanaan GCG sepanjang tahun 2025 sebagai berikut:

1. Memantau dan menganalisis setiap kebijakan terbaru maupunpraktik 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 rencana kerja Bank 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 pendukung.
7. Menyusun pelaporan pelaksanaan GCG Bank dan melakukan penilaian sendiri sesuai ketentuan berlaku, serta melaporkannya kepada Direktur Utama dan Otoritas Jasa Keuangan.

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

Description of responsibilities, duties, and duty implementation of GCG Implementation and Monitoring Committee throughout 2025 is as follows:

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 Bank's work 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 supporting documents.
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.

Struktur dan Keanggotaan Komite Pemantau dan Pelaksanaan GCG

Komposisi anggota Komite Pemantau dan Pelaksanaan GCG telah ditetapkan melalui Surat Keputusan Direksi No. 017/SK-DIR/07/24 tanggal 31 Juli 2024 tentang Susunan Anggota Komite Pemantau Pelaksanaan GCG. Rincian susunan keanggotaan sebagai berikut:

1. Ketua diisi oleh Direktur Kepatuhan dan Manajemen Risiko.
2. Sekretaris diisi oleh Kepala Divisi *Compliance, System Procedure & Coordinator Customer Protection*.
3. Sekretariat diisi oleh Divisi Compliance, System Procedure & Coordinator Customer Protection.

Structure and Composition of GCG Implementation and Monitoring Committee

The composition of GCG Implementation and Monitoring Committee has been determined through the Board of Directors' Decision Letter No. 017/SK-DIR/07/24 dated 31 July 2024 on the Composition of GCG Implementation and Monitoring Committee. Details of the composition are as follows:

1. Chairman held by Director of Compliance and Risk Management.
2. Secretary held by Head of Compliance, System Procedure & Coordinator Customer Protection Division.
3. Secretariat held by Compliance, System Procedure & Coordinator Customer Protection Division

4. Anggota diisi oleh Direksi, Senior *Executive Vice President*, Kepala Divisi SKAI, Kepala Divisi Risk Management, Kepala Divisi SKAI & Anti Fraud, dan Kepala Divisi Corporate Secretary.
5. Undangan Tetap seluruh Kepala Divisi dan/atau Departemen.

Rapat Komite Pemantau dan Pelaksanaan GCG

Merujuk pada Surat Keputusan Direksi No.022/SK-DIR/07/24 tanggal 31 Juli 2024, Komite Pemantau dan Pelaksanaan GCG memiliki kewajiban untuk menyelenggarakan rapat sekurang-kurangnya 3 (tiga) kali dalam setahun. Sepanjang tahun 2025, Komite Pemantau dan Pelaksanaan GCG telah melaksanakan rapat sebanyak 3 (tiga) kali dengan tingkat kehadiran mencapai 100,00%.

4. Members held by the Board of Directors, Senior Executive Vice President, Head of SKAI & Anti-Fraud Division, Head of Risk Management Division, Head of SKAI & Anti-Fraud Division, and Head of Corporate Secretary Division.
5. Permanent Invitation for all Division and/or Department Heads.

GCG Implementation and Monitoring Committee's Meeting

Referring to the Board of Directors' Decision Letter No. 022/SK-DIR/07/24 dated 31 July 2024, GCG Implementation and Monitoring Committee shall hold meetings at least 3 (three) times a year. Throughout 2025, GCG Implementation and Monitoring Committee held 3 (three) meetings with an attendance rate of 100.00%.

Komite Personalia

Komite Personalia dibentuk sebagai bagian dari mekanisme tata kelola untuk membantu Direksi dalam pengelolaan aspek ketenagakerjaan. Komite ini berperan dalam meninjau kebijakan HC, mengawasi implementasi regulasi ketenagakerjaan di sektor perbankan, serta menyampaikan rekomendasi strategis guna mendukung terciptanya praktik ketenagakerjaan yang sesuai dengan ketentuan perundang-undangan di Indonesia.

Pedoman Komite Personalia

Pelaksanaan tugas dan fungsi Komite Personalia senantiasa berlandaskan pada ketentuan perundang-undangan, khususnya Peraturan Pemerintah Pengganti Undang-Undang No. 2 Tahun 2022 tentang Cipta Kerja.

Pernyataan Independensi Komite Personalia

Anggota Komite Personalia menjalankan tugas dan tanggung jawab dengan menjunjung tinggi prinsip independensi, guna memastikan setiap keputusan yang diambil terbebas dari potensi benturan kepentingan serta tetap mengutamakan kepentingan terbaik bagi Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Personalia

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas Komite Personalia sepanjang tahun 2025 sebagai berikut:

1. Memberikan masukkan kepada Direksi dalam merumuskan kebijakan ketenagakerjaan.
2. Mengawasi kebijakan yang berhubungan dengan karyawan agar dilaksanakan secara konsekuen dan konsisten.

Personnel Committee

Personnel Committee is established as part of governance mechanism to assist the Board of Directors in managing employment aspects. This committee plays a role in reviewing HC policies, overseeing the implementation of employment regulations in banking sector, and providing strategic recommendations to support the creation of employment practices that comply with Indonesian laws and regulations.

Personnel Committee Charter

The implementation of Personnel Committee's duties and functions is always based on laws and regulations, specifically Government Regulations in Lieu of Law No. 2 of 2022 on Job Creation.

Statement of Independence of Personnel Committee

Members of the Personnel Committee carry out their duties and responsibilities by upholding the principle of independence, to ensure that every decision taken is free from potential conflict of interest and prioritizes the best interests of the Bank.

Duties, Responsibilities, and the Realization of Personnel Committee Duties

Description of responsibilities, duties, and duty implementation of Personnel Committee throughout 2025 is as follows:

1. Providing inputs to Board of Directors in formulating employment policies.
2. Overseeing employee-related policies to be consistently and consequently implemented.

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.
5. Memberikan masukan dan solusi untuk hambatan dan masalah yang terjadi terkait dengan ketenagakerjaan Bank.

Struktur dan Keanggotaan Komite Personalia

Komposisi anggota Komite Personalia telah ditetapkan melalui Surat Keputusan Direktur No. 014/SK-DIR/12/24 tanggal 23 Desember 2024, dengan susunan keanggotaan sebagai berikut:

1. Ketua diisi oleh Wakil Direktur Utama.
2. Wakil Ketua diisi oleh Direktur Utama.
3. Sekretaris diisi oleh Kepala Divisi *Human Capital Management*.
4. Sekretariat diisi oleh Divisi *Human Capital Management*.
5. Anggota diisi oleh Direksi (sesuai undangan).

Rapat Komite Personalia

Merujuk pada Surat Keputusan Direktur No. 014/SK-DIR/12/24 tanggal 23 Desember 2024, Komite Personalia memiliki kewajiban untuk menyelenggarakan rapat sekurang-kurangnya 3 (tiga) kali dalam setahun, dengan ketentuan rapat dinyatakan sah apabila dihadiri oleh minimal 51% anggota tetap. Sepanjang tahun 2025, Komite Personalia telah mengadakan rapat sebanyak 8 (delapan) kali dengan tingkat kehadiran mencapai 100,00%.

Komite Pengadaan

Komite Pengadaan dibentuk untuk membantu Direksi dalam mengawasi seluruh aktivitas pengadaan barang dan jasa agar berjalan secara transparan, efektif, serta sejalan dengan ketentuan yang berlaku. Komite ini memiliki peran dalam mengevaluasi kebijakan pengadaan, memonitor implementasinya, dan memastikan setiap keputusan yang diambil memberikan nilai tambah bagi kepentingan strategis maupun operasional Bank.

Pedoman Komite Pengadaan

Pelaksanaan tugas dan tanggung jawab Komite Pengadaan berpedoman pada Surat Keputusan Direksi No. 011/SK-DIR/07/24 tanggal 29 Juli 2024 tentang Komite Pengadaan PT Bank Victoria International Tbk.

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.
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 composition of Personnel Committee has been determined through the Board of Directors' Decision Letter No. 014/SK-DIR/12/24 dated 23 December 2024 with the composition as follows:

1. Chairman held by Deputy President Director.
2. Vice Chairman held by President Director.
3. Secretary held by Head of Human Capital Management Division.
4. Secretariat held by Human Capital Management Division.
5. Members held by Board of Directors (according to invitation).

Personnel Committee's Meeting

Referring to Directors' Decision Letter No. 014/SK-DIR/12/24 dated 23 December 2024, Personnel Committee shall hold at least 3 (three) meetings per year, with the requirement that a meeting is deemed valid if attended by at least 51% of the permanent members. Throughout 2025, the Personnel Committee held 8 (eight) meetings with an attendance rate of 100.00%.

Procurement Committee

The Procurement Committee is established to assist the Board of Directors in overseeing all procurement activities for goods and services, ensuring they are carried out transparently, effectively, and in accordance with applicable regulations. This committee's role is to evaluate procurement policies, monitor their implementation, and ensure that every decision made adds value to the Bank's strategic and operational interests.

Procurement Committee Charter

The Procurement Committee's duties and responsibilities are guided by the Board of Directors' Decision Letter No. 011/SK-DIR/07/24 dated 29 July 2024 on Procurement Committee of PT Bank Victoria International Tbk.

Pernyataan Independensi Komite Pengadaan

Anggota Komite Pengadaan melaksanakan tugas dan tanggung jawab dengan menjunjung tinggi prinsip independensi, sehingga setiap proses pengambilan keputusan dapat terhindar dari potensi benturan kepentingan serta tetap mengutamakan perlindungan terhadap kepentingan Bank.

Statement of Independence of Procurement Committee

Members of the Procurement Committee carry out their duties and responsibilities by upholding the principle of independence, ensuring that every decision-making process avoids potential conflict of interest and prioritizes protecting the Bank's interests.

Tugas dan Tanggung Jawab Komite Pengadaan

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas Komite Pengadaan sepanjang tahun 2025 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.
4. Memberikan masukan kepada Direksi terkait hal-hal penting dan relevan dalam perumusan kebijakan pengadaan barang dan jasa.

Duties and Responsibilities of Procurement Committee

Description of responsibilities, duties, and duty implementation of Procurement Committee throughout 2025 is 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.
4. Providing inputs to the Board of Directors regarding important and relevant matters in the formulation of procurement policies of goods and services.

Struktur dan Keanggotaan Komite Pengadaan

Komposisi anggota Komite Pengadaan ditetapkan berdasarkan Surat Keputusan Direksi No. 011/SK-DIR/07/24 tanggal 29 Juli 2024, dengan susunan keanggotaan sebagai berikut:

1. Ketua diisi oleh Wakil Direktur Utama.
2. Wakil Ketua diisi oleh Direktur Utama.
3. Sekretaris diisi oleh *General Affairs Vice Division Head*.
4. Anggota Tetap diisi oleh Direktur Keuangan, Direktur Bisnis, *SEVP of Business, SEVP of Operation & International Banking, SEVP of Finance, Accounting & MIS, SEVP of Change Management Office, HCM & General Affairs Division.*

Structure and Composition of Procurement Committee

The composition of Procurement Committee is determined based on the Board of Directors' Decision Letter No. 011/SK-DIR/07/24 dated 29 July 2024, with the composition as follows:

1. Chairman held by Deputy President Director.
2. Vice Chairman held by President Director.
3. Secretary held by General Affairs Vice Division Head.
4. Permanent Members held by Director of Finance, Director of Business, SEVP of Business, SEVP of Operation & International Banking, SEVP of Finance, Accounting & MIS, SEVP of Change Management Office, HCM & General Affairs Division.

Rapat Komite Pengadaan

Merujuk pada Surat Keputusan Direksi No. 011/SK-DIR/07/24 tanggal 29 Juli 2024, Komite Pengadaan memiliki kewajiban untuk menyelenggarakan rapat sedikitnya 3 (tiga) kali dalam setahun, dengan ketentuan rapat dinyatakan sah apabila dihadiri oleh minimal 51% anggota tetap. Sepanjang tahun 2025, Komite Pengadaan telah mengadakan rapat sebanyak 13 (tiga belas) kali dengan tingkat kehadiran sebesar 100,00%.

Procurement Committee's Meeting

Referring to the Board of Directors' Decision Letter No. 011/SK-DIR/07/24 dated 29 July 2024, Procurement Committee shall hold at least 3 (three) meetings per year, with the requirement that a meeting is deemed valid if attended by at least 51% of the permanent members. Throughout 2025, Procurement Committee held 13 (thirteen) meetings with an attendance rate of 100.00%.

Komite Produk

Komite Produk berperan membantu Direksi dalam merumuskan kebijakan terkait pengelolaan produk *liabilities* dan *wealth management* agar memiliki daya saing serta memberikan nilai tambah bagi Bank. Dalam menjalankan fungsinya, Komite senantiasa mengutamakan kepentingan nasabah maupun Bank, dengan tetap berlandaskan pada prinsip kehati-hatian serta penerapan manajemen risiko yang efektif.

Pedoman Komite Produk

Pelaksanaan tugas dan wewenang Komite Produk berlandaskan pada Surat Keputusan Direksi No. 008/SK-DIR/08/24 tanggal 15 Agustus 2024 tentang Komite Produk PT Bank Victoria International Tbk.

Pernyataan Independensi Komite Produk

Anggota Komite Produk menjalankan peran dan tanggung jawab dengan menjunjung tinggi prinsip independensi, sehingga setiap keputusan yang diambil terbebas dari potensi benturan kepentingan dan tetap berorientasi pada perlindungan serta keberlanjutan kepentingan Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Produk

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas Komite Produk sepanjang tahun 2025 sebagai berikut:

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.
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.

Product Committee

Product Committee plays a role in assisting the Board of Directors in formulating policies related to the management of liabilities and wealth management products to ensure competitiveness and added value to the Bank. In carrying out its functions, the Committee consistently prioritizes the interests of both customers and the Bank, while adhering to the principle of prudent and the implementation of effective risk management.

Product Committee Charter

Duties and authorities of Product Committee are based on Board of Directors' Decision Letter No. 008/SK-DIR/08/24 dated 15 August 2024 on Product Committee of PT Bank Victoria International Tbk.

Statement of Independence of Product Committee

Members of the Product Committee carry out their roles and responsibilities by upholding the principle of independence, ensuring that every decision taken is free from potential conflict of interest and remains oriented toward the protection and sustainability of the Bank's interests.

Duties, Responsibilities, and the Realization of Product Committee Duties

Description of responsibilities, duties, and duty implementation of Product Committee throughout 2025 is as follows:

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.
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.

Struktur dan Keanggotaan Komite Produk

Komposisi anggota Komite Produk ditetapkan melalui Surat Keputusan Direksi No. 009/SK-DIR/08/24 tanggal 15 Agustus 2024 tentang Komite Produk PT Bank Victoria International Tbk, dengan susunan keanggotaan sebagai berikut:

1. Ketua diisi oleh Direktur Utama.
2. Wakil Ketua diisi oleh Wakil Direktur Utama.
3. Sekretaris diisi oleh *Marketing Communication* dan *Brand and Product Division Head*.
4. Anggota diisi oleh Direktur Bisnis; Direktur Keuangan; *Senior Executive Vice President Change Management Office; Senior Executive Vice President of Business; Senior Executive Vice President of Operations & International Banking; Senior Executive Vice President of Finance, Accounting & Strategic Performance Management*; Kepala Divisi *Information Technology*; Kepala Divisi *Operations & Internal Control*; Kepala Divisi *Compliance, System Procedure & Coordinator Customer Protection;* Kepala Divisi *Accounting*; Kepala Divisi *Treasury*; Kepala Divisi *Risk Management*; Kepala Divisi *Branch Banking Network;* Kepala Divisi *Change Management Office; E-Channel and Digital Transformation Department Head;* dan Kepala Divisi *Commercial Banking.*

Structure and Composition of Product Committee

The composition of Product Committee is determined based on the Board of Directors' Decision Letter No. 009/SK-DIR/08/24 dated 15 August 2024 on Product Committee of PT Bank Victoria International Tbk, with composition as follows:

1. Chairman held by President Director.
2. Vice Chairman held by Deputy President Director.
3. Secretary held by Marketing Communication and Brand and Product Division Head.
4. Members held by Director of Business; Director of Finance; Senior Executive Vice President Change Management Office; Senior Executive Vice President of Business; Senior Executive Vice President of Operations & International Banking; Senior Executive Vice President of Finance, Accounting & Strategic Performance Management; Head of Information Technology Division; Head of Operations & Internal Control Division; Head of Compliance, System Procedure & Coordinator Customer Protection Division; Head of Accounting Division; Head of Treasury Division; Head of Risk Management Division; Head of Branch Banking Network; Head of Change Management Office Division; E-Channel and Digital Transformation Department Head; and Head of Commercial Banking Division.

Rapat Komite Produk

Merujuk pada Surat Keputusan Direksi No. 008/SK-DIR/08/24, Komite Produk berkewajiban menyelenggarakan rapat sedikitnya 3 (tiga) kali dalam setahun atau sewaktu-waktu apabila diperlukan. Suatu rapat dinyatakan sah apabila dihadiri oleh sekurang-kurangnya 50% + 1 (satu) dari jumlah anggota tetap. Sepanjang tahun 2025, Komite Produk telah mengadakan rapat sebanyak 4 (empat) kali dengan tingkat kehadiran sebesar 100,00%.

Product Committee's Meeting

Referring to the Board of Directors' Decision Letter No. 008/SK-DIR/08/24, the Product Committee shall hold at least 3 (three) meetings in a year or at any time as necessary. A meeting is deemed valid if attended by at least 50% + 1 (one) of the permanent members. Throughout 2025, Product Committee held 4 (four) meetings with an attendance rate of 100.00%.

Organ Pendukung Direksi
Board of Directors Supporting Organ

Corporate Secretary

Corporate Secretary berperan strategis dalam memastikan kepatuhan Bank terhadap hukum dan peraturan, menyampaikan informasi penting kepada pemangku kepentingan secara tepat waktu, akurat, dan transparan, serta mengelola komunikasi internal-eksternal untuk menjaga dan meningkatkan reputasi Bank.

Pedoman *Corporate Secretary*

Pelaksanaan tugas *Corporate Secretary* mengacu pada pedoman kerja yang telah disesuaikan dengan:

1. Peraturan Otoritas Jasa Keuangan No. 35/POJK.04/2014 tanggal 8 Desember 2014 tentang Sekretaris Perusahaan Emiten atau Perusahaan Publik.
2. Standar Operasional Prosedur *Corporate Secretary* Surat Keputusan Direksi No. 005/SK-DIR/09/24 tanggal 17 September 2024.
3. Standar Operasional Prosedur Rapat Umum Pemegang Saham berdasarkan Keputusan Direksi No. 004/SK-DIR/08/24 tanggal 13 Agustus 2024.

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

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas *Corporate Secretary* sepanjang tahun 2025 sebagai berikut:

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.
4. Sebagai penghubung atau *contact person* antara Bank dengan Otoritas Jasa Keuangan serta masyarakat.

Corporate Secretary

Corporate Secretary plays a strategic role in ensuring the Bank's compliance with laws and regulations, conveying important information to stakeholders in a timely, accurate, and transparent manner, and managing internal and external communications to maintain and enhance the Bank's reputation.

Corporate Secretary Charter

The Corporate Secretary's duty implementation is carried out in accordance with the charter adjusted to:

1. Financial Services Authority Regulation No. 35/POJK.04/2014 dated 8 December 2014 on Corporate Secretary of Issuers or Public Companies.
2. Standard Operating Procedures of Corporate Secretary based on the Board of Directors' Decision Letter No. 005/SK-DIR/09/24 dated 17 September 2024.
3. Standard Operating Procedures of General Meeting of Shareholders based on the Board of Directors' Decision Letter No. 004/SK-DIR/08/24 dated 13 August 2024.

Duties, Responsibilities, and the Realization of Corporate Secretary Duties

Description of responsibilities, duties, and duty implementation of Corporate Secretary throughout 2025 is as follows:

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.
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

Usia / Age
38 tahun / 38 years old

Tempat Lahir / Place of Birth
Jakarta

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Keputusan Direksi No. 012/SK-DIR/HCM/01/21 tanggal 11 Januari 2021 (2021-sekarang).

Basis of Appointment and Term of Office
Board of Directors' Decision No. 012/SK-DIR/HCM/01/21 dated 11 January 2021 (2021-present).

Riwayat Pendidikan
Sarjana Hukum dari Universitas Padjadjaran (2012).

Education
Bachelor of Law from Padjadjaran University (2012).

Rangkap Jabatan Saat Ini
Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

Current Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

Riwayat 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).
- *Unit Head Corporate Secretary Bank* Victoria (2019-2021).

History of Previous
- 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).
- Corporate Secretary Unit Head of Bank Victoria (2019-2021).

Sertifikasi
Sertifikasi Manajemen Risiko Jenjang 5 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

Certification
Certification of Risk Management Level 5 from Banking Profession Certification Institute (2024-2027).

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

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 2025, *Corporate Secretary* aktif berpartisipasi dalam berbagai program pengembangan kompetensi, baik melalui pelatihan internal maupun eksternal, guna mendukung peningkatan profesionalisme dan efektivitas pelaksanaan tugas dengan materi, antara lain:

1. *Sharing Session "Suistainable Growth Through Digitalization and Strong Governance"* - Diselenggarakan oleh Internal Bank Victoria.
2. *Training Refreshment* Manajemen Risiko Jenjang 5 – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia.
3. *Training Refreshment Financial Integrity Rating* (FIR) 2025 dan Tindak Pidana Pencucian Uang - Diselenggarakan oleh Andara Sarana.
4. *Team Building: "One Team, Endless Possibilities"* - Diselenggarakan oleh Internal Bank Victoria.
5. *Training Building a Fraud-Resilent Bank: From Detection to Response* – Diselenggarakan oleh Victoria Institute.

Corporate Secretary's Training and/or Development Programs

Throughout 2025, Corporate Secretary actively participated in various competency development programs, both through internal and external training, to support the improvement of professionalism and effectiveness of duties with topics, including:

1. Sharing Session "Sustainable Growth Through Digitalization and Strong Governance" - Organized by Bank Victoria Internally.
2. Training Refreshment of Risk Management Level 5 - Organized by Indonesian Banking Development Institute.
3. Training Refreshment Financial Integrity Rating (FIR) 2025 and Money Laundering Crimes - Organized by Andara Sarana.
4. Team Building: "One Team, Endless Possibilities" - Organized by Bank Victoria Internally.
5. Training Building a Fraud-Resilient Bank: From Detection to Response – Organized by Victoria Institute.

6. *Training* Bahaya Pinjaman *Online* – Diselenggarakan oleh Internal Bank Victoria.
7. *Training: Expert Sharing Session* "Transformasi Digital IT Perbankan – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia.
8. *Training* Strategi dan Implementasi Pelindungan Konsumen dan Data Pribadi – Diselenggarakan oleh Victoria Institute.
9. *Training Driving Branch Productivity Through Effective Leadership* – Diselenggarakan oleh Edcore Indonesia.
10. Pendalaman Peraturan Otoritas Jasa Keuangan No. 14/POJK.04/2022 tentang Penyampaian Laporan Keuangan Berkala Emiten Atau Perusahaan Publik – Diselenggarakan oleh Institute of Chartered Secretaries and Administrators.
11. Peraturan Otoritas Jasa Keuangan No. 9 Tahun 2023 dan Surat Edaran Otoritas Jasa Keuangan No. 18/SEOJK.03/2023 – Diselenggarakan oleh Institute of Chartered Secretaries and Administrators.
12. Konfirmasi dalam Rangka Pengajuan Persetujuan Prinsip Derivatif Keuangan dengan Aset yang Mendasari Berupa Efek – Diselenggarakan oleh Otoritas Jasa Keuangan.
13. Pendalaman Peraturan No. I-E tentang Kewajiban Penyampaian Informasi – Diselenggarakan oleh Institute of Chartered Secretaries and Administrators.
14. Pendalaman Peraturan Otoritas Jasa Keuangan No. 29 Tahun 2023 tentang Pembelian Kembali Saham yang Dikeluarkan oleh Perusahaan Terbuka – Diselenggarakan oleh Institute of Chartered Secretaries and Administrators.
15. Sosialisasi Peraturan Otoritas Jasa Keuangan Transaparansi dan Publikasi Laporan dan Rancangan Peraturan Otoritas Jasa Keuangan APOLO – Diselenggarakan oleh Otoritas Jasa Keuangan.
16. Sosialisasi Surat Edaran Otoritas Jasa Keuangan No. 10/SEOJK.04/2025 – Diselenggarakan oleh Otoritas Jasa Keuangan.
17. *Refreshment* Anti-*Fraud* – Diselenggarakan oleh Internal Bank Victoria.
18. Training *Awareness* Peraturan Otoritas Jasa Keuangan Pelindungan Konsumen dan Undang-Undang Perlindungan Data Pribadi – Diselenggarakan oleh Internal Bank Victoria.
19. Webinar "Peraturan Bursa I-A Pencatatan Saham dan Efek Bersifat Ekuitas Selain Saham yang Diterbitkan oleh Perusahaan Tercatat" – Diselenggarakan oleh Institute of Chartered Secretaries and Administrators.

6. Training of Online Loan Dangers – Organized by Bank Victoria Internally.
7. Training: Expert Sharing Session "Digital Transformation of Banking IT" – Organized by Indonesian Banking Development Institute.
8. Training on Strategy and Implementation of Consumer and Personal Data Protection – Organized by Victoria Institute.
9. Training Driving Branch Productivity Through Effective Leadership - Organized by Edcore Indonesia.
10. Intensification of Financial Services Regulation No. 14/POJK.04/2022 on Submission of Periodic Financial Statements of Issuers or Public Companies – Organized by Institute of Chartered Secretaries and Administrators.
11. Financial Services Authority Regulation No. 9 of 2023 and Financial Services Authority Circular No. 18/SEOJK.03/2023 – Organized by Institute of Chartered Secretaries and Administrators.
12. Confirmation for Submission of Approval in Principle of Financial Derivatives with Underlying Assets in the Form of Securities - Organized by Financial Services Authority.
13. Intensification of Regulation No. I-E on Obligations to Submit Information - Organized by Institute of Chartered Secretaries and Administrators.
14. Intensification of Financial Services Regulation No. 29 of 2023 on Buyback of Shares Issued by Public Companies – Organized by Institute of Chartered Secretaries and Administrators.
15. Dissemination of Financial Services Authority Regulations, Transparency and Publication of Reports and Draft Financial Services Authority Regulations APOLO – Organized by Financial Services Authority.
16. Dissemination of Financial Services Authority Circular No. 10/SEOJK.04/2025 – Organized by Financial Services Authority.
17. Anti-Fraud Refreshment – Organized by Bank Victoria Internally.
18. Training Awareness on Financial Services Authority Regulations, Consumer Protection and Personal Data Protection Law – Organized by Bank Victoria Internally.
19. Webinar "Exchange Regulation I-A, Listing of Shares and Equity-Type Securities Other Than Shares Issued by Listed Companies" – Organized by Institute of Chartered Secretaries and Administrators.

Satuan Kerja Audit Internal

Satuan Kerja Audit Internal (SKAI) berperan sebagai unit independen yang berada di bawah Direktur Utama, dengan tugas utama memberikan *assurance* dan konsultasi guna memperkuat efektivitas manajemen risiko, pengendalian internal, serta penerapan tata kelola yang baik di Bank.

Pedoman SKAI

Dalam melaksanakan tugas dan tanggung jawabnya, SKAI mengacu pada Piagam Audit Internal, Sistem, Prosedur, dan Teknik Pemeriksaan Internal.

Tugas dan Tanggung Jawab SKAI

Uraian mengenai tugas dan tanggung jawab SKAI 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.
9. Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkatan manajemen.

Fungsi Audit Internal

Bank menerapkan fungsi audit internal sebagai bagian dari sistem pengendalian internal yang bertujuan untuk memberikan penilaian independen dan objektif atas kecukupan dan efektivitas pengendalian internal, manajemen risiko, dan tata kelola Bank. Fungsi audit internal dilaksanakan oleh SKAI yang independen dari kegiatan operasional serta memiliki wewenang dan akses yang memadai dalam menjalankan tugasnya.

Internal Audit Work Unit

Internal Audit Work Unit (SKAI) acts as an independent unit under the President Director, with the primary task of providing assurance and consultation to strengthen the effectiveness of risk management, internal control, and good governance implementation at the Bank.

SKAI Charter

In performing its duties and responsibilities, SKAI refers to the Internal Audit Charter, Internal Audit System, Procedure, and Technique.

Duties and Responsibilities of the SKAI

Description of SKAI duties and responsibilities is 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. Providing recommendations for improvement and objective information on activities audited at all management levels.

Internal Audit Function

The Bank implements internal audit function as part of internal control system aiming at providing an independent and objective assessment of the adequacy and effectiveness of internal control, risk management, and governance of the Bank. Internal audit function is carried out by SKAI, which is independent from operational activities and has adequate authority and access to carry out its duties.

Pelaksanaan fungsi audit internal dilakukan sesuai dengan rencana audit tahunan yang berbasis risiko dan mengacu pada ketentuan Otoritas Jasa Keuangan mengenai penerapan fungsi audit internal pada bank umum. Bank juga menjalin komunikasi secara berkala dengan Otoritas Jasa Keuangan guna meningkatkan efektivitas pelaksanaan fungsi audit internal serta memastikan tindak lanjut yang memadai atas temuan dan rekomendasi yang disampaikan.

Selain itu, dalam menerapkan fungsi audit internal Dewan Komisaris bertanggung jawab untuk:

1. Memastikan Direksi menyusun dan memelihara sistem pengendalian internal yang memadai, efektif, dan efisien.
2. Mengkaji efektivitas dan efisiensi sistem pengendalian internal berdasarkan laporan dan informasi dari SKAI paling sedikit 1 (satu) kali dalam 1 (satu) tahun.
3. Menunjuk pengendali mutu independen dari pihak eksternal untuk melakukan kaji ulang atas kinerja SKAI dengan mempertimbangkan rekomendasi Komite Audit.

Adapun tanggung jawab Direksi dalam penerapan fungsi audit internal sebagai berikut:

1. Mengembangkan dan memelihara kerangka pengendalian internal yang memadai guna mengidentifikasi, mengukur, memantau, dan mengendalikan seluruh risiko Bank.
2. Memastikan SKAI memperoleh informasi yang relevan terkait perkembangan kegiatan usaha, inisiatif strategis, proyek, produk, perubahan operasional, serta risiko yang diidentifikasi.
3. Memastikan tindak lanjut yang optimal atas seluruh temuan dan rekomendasi SKAI.
4. Menyediakan sumber daya dan anggaran yang memadai bagi Kepala SKAI untuk mendukung pelaksanaan rencana audit tahunan.

Kedudukan dan Struktur SKAI

SKAI beroperasi secara independen di bawah koordinasi Direktur Utama dengan akses penuh terhadap seluruh aktivitas Bank. SKAI juga memiliki jalur komunikasi langsung dengan Komite Audit dan Dewan Komisaris untuk memastikan penerapan GCG berjalan efektif. Kepala SKAI diangkat maupun diberhentikan oleh Direktur Utama dengan persetujuan Dewan Komisaris, dan setiap keputusan terkait dilaporkan kepada regulator.

The internal audit function is implemented in accordance with risk-based annual audit plan by referring to the Financial Services Authority regulations on internal audit function implementation in commercial banks. The Bank also maintains regular communication with Financial Services Authority to improve the effectiveness of internal audit function and ensure adequate follow-up on submitted findings and recommendations.

Furthermore, in implementing internal audit function, the Board of Commissioners is responsible for:

1. Ensuring that the Board of Directors prepares and maintains an adequate, effective, and efficient internal control system.
2. Reviewing the effectiveness and efficiency of internal control system based on reports and information from SKAI at least once a year.
3. Appointing an independent external quality control officer to review SKAI performance, by considering the recommendations of Audit Committee.

The Board of Directors' responsibilities in implementing internal audit function are as follows:

1. Developing and maintaining an adequate internal control framework to identify, measure, monitor, and control all Bank risks.
2. Ensuring SKAI obtains relevant information on developments in business activities, strategic initiatives, projects, products, operational changes, and risks identified.
3. Ensuring optimal follow-up on all SKAI findings and recommendations.
4. Providing adequate resources and budget for the Head of SKAI to support the implementation of annual audit plan.

Position and Structure of SKAI

SKAI operates independently under the coordination of the President Director, with full access to all activities of the Bank. SKAI also has a direct line of communication with Audit Committee and Board of Commissioners to ensure an effective GCG implementation. The Head of SKAI is appointed and dismissed by the President Director with approval of the Board of Commissioners, and all related decisions are reported to the regulator.

Profil Kepala Divisi SKAI
Profile of Head of SKAI Division

DJOKO SOENDJOJO
Kepala Divisi SKAI
Head of SKAI

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Surabaya

Usia / Age
57 tahun / 57 years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Keputusan Direksi No. 003/SK-DIR/HCM/01/19 tanggal 2 Januari 2019 *juncto* Keputusan Direksi No. 017/SK-DIR/HCM/11/21 tanggal 22 November 2021 *juncto* Keputusan Direksi No. 001/SK-DIR/HCM/10/24 tanggal 1 Oktober 2024.

Basis of Appointment and Term of Office
Board of Directors' Decision Letter No. 003/SK-DIR/HCM/01/19 dated 2 January 2019 juncto Board of Directors' Decision Letter No. 017/SK-DIR/HCM/11/21 dated 22 November 2021 juncto Board of Directors' Decision Letter No. 001/SK-DIR/HCM/10/24 dated 1 October 2024.

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

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

Rangkap Jabatan Saat Ini
Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

Current Concurrent Positions
In Bank Victoria:
None

Outside of Bank Victoria:
None

Riwayat Jabatan
- *Staff* Senior Akuntansi dan Keuangan PT Bank Andromeda Kantor Pusat Jakarta (1995-1997).
- *Staff* Senior Akuntansi dan Keuangan PT Bank Alfa BBKU Kantor Pusat Jakarta (1997-1999).
- *Staff* Administrasi BBO-BBKU BBPN/IBRA Kantor Pusat Jakarta (2000-2004).
- *Staff* Senior Keuangan & *Custody* Tim Likuidasi PT Bank Prasidha 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 (2006-2015).
- Kepala Divisi Administrasi Pengkreditan Bank Victoria (2015-2018).

History of Previous
- Senior Accounting and Finance Staff of PT Bank Andromeda, Jakarta Head Office (1995-1997).
- Senior Accounting and Finance Staff of PT Bank Alfa BBKU, Jakarta Head Office (1997-1999).
- Administration Staff of BBO-BBKU BBPN/IBRA, Jakarta Head Office (2000-2004).
- Senior Staff of Finance & Custody of Liquidation Team of PT Bank Prasidha 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 (SKAI) of Bank Victoria (2006-2015).
- Head of Credit Administration Division of Bank Victoria (2015-2018).

Sertifikasi
- Sertifikasi Audit Intern Level Supervisor dari Lembaga Sertifikasi Profesi Perbankan (2022-2026).
- Sertifikasi Manajemen Risiko Jenjang 6 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

Certification
- Supervisor Level of Internal Audit Certification from the Banking Profession Certification Institute (2022-2026).
- Certification of Risk Management Level 6 from Banking Profession Certification Institute (2024-2027).

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

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

Di tahun 2025, jumlah personel SKAI terdiri dari 8 (delapan) orang yang telah dibekali dengan sertifikasi manajemen risiko perbankan serta sertifikasi profesi audit internal, dengan rincian sebagai berikut:

Composition and Professional Certification of SKAI

In 2025, SKAI consisted of 8 (eight) personnel equipped with certification in banking risk management and certification in internal audit profession, with the following details:

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 Supervisor Supervisor Level	5 Desember 2026 5 December 2026	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Ferry A Deuning	Kepala Unit Head of Unit	Level Supervisor Supervisor Level	25 November 2027	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
Diah Rucihto Januar	*Senior Officer*	Level Auditor Auditor Level	25 November 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Wilma Pramana	*Officer*	Level Auditor Auditor Level	8 September 2028	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Theresia Alexandra Wijaya	*Officer*	Level Auditor Auditor Level	8 September 2028	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Jefferson Lianto Mualim	*Officer*	-	-	-
Fathan Qoriba	*Officer*	-	-	-
Sertifikasi Manajemen Risiko **Risk Management Certification**				
Djoko Soendjojo	Kepala Divisi Head of Division	Manajemen Risiko Jenjang 6 Risk Management Level 6	19 Maret 2027 19 March 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Ferry A Deuning	Kepala Unit Head of Unit	Manajemen Risiko Jenjang 5 Risk Management Level 5	4 April 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Fadillah Syarif	*Senior Officer*	Manajemen Risiko Jenjang 5 Risk Management Level 5	4 April 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Diah Rucihto Januar	*Senior Officer*	Manajemen Risiko Jenjang 4 Risk Management Level 4	9 September 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Wilma Pramana	*Officer*	Manajemen Risiko Jenjang 5 Risk Management Level 5	23 April 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Theresia Alexandra Wijaya	*Officer*	Manajemen Risiko Jenjang 4 Risk Management Level 4	6 Oktober 2028 6 October 2028	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Jefferson Lianto Mualim	*Officer*	Manajemen Risiko Jenjang 4 Risk Management Level 4	6 Oktober 2028 6 October 2028	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Fathan Qoriba	*Officer*	Manajemen Risiko Jenjang 4 Risk Management Level 4	20 Desember 2027 20 December 2027	Badan Sertifikasi Manajemen Risiko Risk Management Certification Institution
Certificate Anti-Fraud Manager				
Ferry A Deuning	Kepala Unit Head of Unit	*Certificate Anti-Fraud Manager*	8 November 2026	Asia Anti Fraud

Rapat SKAI

SKAI menyelenggarakan rapat koordinasi dengan Komite Audit, Direksi, dan Dewan Komisaris secara berkala, sekurang-kurangnya 4 (empat) kali dalam setahun. Rapat tersebut bertujuan untuk membahas laporan hasil audit triwulanan serta isu-isu penting terkait pengendalian internal dan tata kelola. Pada tahun 2025, SKAI telah mengadakan rapat sebanyak 64 (enam puluh empat) kali dengan agenda pembahasan antara lain:

1. Pembahasan *macro risk assessment* dengan Direktur Utama sebanyak 2 (dua) kali).
2. Rencana kerja audit tahunan dengan Komite Audit sebanyak 1 (satu) kali.

SKAI Meeting

SKAI holds regular coordination meetings with Audit Committee, Board of Directors, and Board of Commissioners, at least 4 (four) times a year. These meetings aim to discuss quarterly audit reports and important issues related to internal control and governance. In 2025, SKAI held 64 (sixty-four) meetings with discussion agenda including:

1. Two (2) meetings with the President Director to discuss the macro risk assessment.
2. One (1) meeting with the Audit Committee to discuss the annual audit work plan.

3. Rencana kerja audit tahunan dengan Direktur Utama sebanyak 1 (satu) kali.
4. Pembahasan materi komunikasi SKAI dengan Otoritas Jasa Keuangan sebanyak 1 (satu) kali.
5. Pembahasan Laporan Pokok-Pokok Hasil Audit per Semester dengan Direktur Utama dan Komite Audit sebanyak 2 (dua) kali.
6. Progres audit bulanan dengan Komite Audit sebanyak 12 (dua belas) kali.
7. Progres audit mingguan dalam rapat Direktorat dengan Direktur Utama sebanyak 45 (empat puluh lima) kali.

3. One (1) meeting with the President Director to discuss the annual audit work plan.
4. One (1) meeting with the Financial Services Authority to discuss the SKAI communication materials.
5. Two (2) meetings with the President Director and Audit Committee to discuss the Main Audit Result Reports per Semester.
6. Twelve (12) meetings with the Audit Committee to check on the progress of monthly audit.
7. Forty-five (45) meetings with the President Director to check on the progress of weekly audit.

Rencana dan Realisasi Pelaksanaan Kerja SKAI

Pada tahun 2025, seluruh kegiatan pemeriksaan dilaksanakan sesuai rencana kerja yang telah ditetapkan. Setiap tahapan audit terselesaikan tepat waktu sehingga proses pengawasan dan evaluasi terhadap unit-unit kerja berjalan efektif serta mendukung pencapaian tujuan Bank. Adapun objek audit di tahun 2025 ditunjukkan sebagai berikut:

Work Plan and Realization of SKAI

In 2025, all audit activities were carried out according to the established work plan. Each stage of audit was completed on time, ensuring effective monitoring and evaluation of work units and supporting the achievement of the Bank's objectives. The audit objectives in 2025 were as follows:

Pemeriksaan Audit	Objek Pemeriksaan Audit Object
Operasional dan Kredit Cabang Branch Operations and Credit	30 Kantor Cabang/Cabang Pembantu 30 Branch Offices/Sub-Branches
Unit Kerja Bisnis Business Unit	6 Unit Kerja 6 Work Units
Unit Kerja *Supporting* Supporting Business Unit	8 Unit Kerja 8 Work Units
Objek Mandatori Mandatory Objectives	6 Objek Mandatori 6 Mandatory Objectives

Temuan dan Tindak Lanjut Hasil Audit

Selama tahun 2025, SKAI menyampaikan hasil audit kepada Dewan Komisaris dan Direksi yang memuat sejumlah temuan disertai rekomendasi perbaikan. Setiap rekomendasi ditindaklanjuti oleh *auditee*, dengan progres penyelesaian terus dipantau hingga tuntas. Dari total 911 temuan yang dihasilkan, sebanyak 874 temuan atau 95,94% telah diselesaikan, sementara 37 temuan atau 4,06% masih dalam proses penyelesaian.

Findings and Follow-Up on Audit Results

Throughout 2025, SKAI submitted audit results to the Board of Commissioners and Board of Directors, containing a number of findings and recommendations for improvement. Each recommendation was followed up by the auditee, with progress continuously monitored until completion. Of the total 911 findings generated, 874 findings or 95.94% were resolved, while 37 findings or 4.06% were still in settlement process.

Efektivitas dan Cakupan Audit Internal dalam Menilai Seluruh Aspek dan Unsur Kegiatan Bank

Audit internal Bank dilaksanakan secara efektif dan komprehensif dengan cakupan penilaian atas seluruh aspek dan unsur kegiatan Bank, meliputi operasional, keuangan, manajemen risiko, kepatuhan, teknologi informasi, dan tata kelola, melalui pendekatan berbasis risiko dan rencana

Effectiveness and Scope of Internal Audit in Assessing All Aspects and Elements of the Bank's Activities

The Bank's internal audit was carried out effectively and comprehensively, with assessments covering all aspects and elements of the Bank's activities, including operations, finance, risk management, compliance, information technology, and governance, through risk-based approach audit tahunan. Efektivitas audit internal tercermin dari kemampuan SKAI dalam mengidentifikasi kelemahan pengendalian internal, memberikan rekomendasi perbaikan yang relevan, serta memantau tindak lanjut secara berkelanjutan, yang hasilnya dilaporkan kepada Direksi dan Dewan Komisaris guna mendukung peningkatan kualitas pengendalian internal, kepatuhan, dan penerapan GCG.

Pelatihan dan/atau Peningkatan SKAI

Pada tahun 2025, SKAI berpartisipasi dalam sejumlah program pelatihan dan pengembangan kompetensi, baik internal maupun eksternal, sebanyak 38 kali, dengan materi, antara lain:

1. *Financial Integrity Rating* 2025 dan Tindak Pidana Pencucian Uang – Diselenggarakan oleh Andara Sarana.
2. Peningkatan Fungsi Pengendalian Internal Bank – Diselenggarakan oleh Andara Sarana.
3. *Building a Fraud-Resilient Bank: From Detection to Response* – Diselenggarakan oleh Victoria Institute.
4. Strategi dan Implementasi Pelindungan Konsumen dan Data Pribadi – Diselenggarakan oleh Victoria Institute.
5. *Driving Branch Productivity Through Effective Leadership* dari – Diselenggarakan oleh Edcore Indonesia.
6. Transformasi Digital IT Perbankan – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia.
7. *IT Audit Fundamental* – Diselenggarakan oleh SGI Asia.
8. *IT Risk Management* – Diselenggarakan oleh Acumen Advice.
9. *Auditing Treasury Business* – Diselenggarakan oleh Ikatan Audit Internal Bank.
10. Sistem Pengendalian Intern – Diselenggarakan oleh Dakara Kreasi.
11. *Remittance* – Diselenggarakan oleh BNI Corporate University.
12. Indentifikasi Transaksi Keuangan Mencurigakan dan Penentuan Indikasi Tindak Pidana Asal – Diselenggarakan oleh Forum Komunikasi Direktur Kepatuhan Perbankan.
13. ISO 20O22 Pacs.008 dan Pacs.009 *SWIFT* – Diselenggarakan oleh Asosiasi SWIFT Indonesia.
14. Perdagangan Berjangka Komoditi, Resi Gudang, dan Aset Kripto – Diselenggarakan oleh Asosiasi Perusahaan Pembiayaan Indonesia.

and annual audit plan. The effectiveness of internal audit is reflected in SKAI ability to identify internal control weaknesses, provide relevant recommendations for improvement, and monitor follow-up actions on an ongoing basis. The results are reported to the Board of Directors and Board of Commissioners to support quality improvements in internal control, compliance, and GCG implementation.

SKAI Training and/or Development Programs

In 2025, SKAI participated in a number of training and competency development programs, both internal and external, a total of 38 programs, with topics including:

1. Financial Integrity Rating 2025 and Money Laundering Crimes – Organized by Andara Sarana.
2. Enhancing Bank Internal Control Functions – Organized by Andara Sarana.
3. Building a Fraud-Resilient Bank: From Detection to Response – Organized by Victoria Institute.
4. Strategy and Implementation of Consumer and Personal Data Protection – Organized by Victoria Institute.
5. Driving Branch Productivity Through Effective Leadership – Organized by Edcore Indonesia.
6. Digital Transformation of Banking IT – Organized by Indonesian Banking Development Institute.
7. IT Audit Fundamental – Organized by SGI Asia.
8. IT Risk Management – Organized by Acumen Advice.
9. Auditing Treasury Business – Organized by the Bank Internal Audit Association.
10. Internal Control System – Organized by Dakara Kreasi.
11. Remittance – Organized by BNI Corporate University.
12. Identification of Suspicious Financial Transactions and Determination of Indications of Predicate Crimes – Organized by the Communication Forum for Director of Banking Compliance.
13. ISO 20022 Pacs.008 and Pacs.009 SWIFT – Organized by Indonesian SWIFT Association.
14. Commodity Futures Trading, Warehouse Receipts, and Crypto Assets – Organized by Indonesian Financing Companies Association.

Akuntan Publik
Public Accountant

Kebijakan Penunjukan Akuntan Publik

Mengacu pada ketentuan Peraturan Otoritas Jasa Keuangan No. 37/POJK.03/2019 tentang Transparansi dan Publikasi Laporan Bank serta Peraturan Otoritas Jasa Keuangan No. 9 Tahun 2023 tentang Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan, serta keputusan RUPS Tahunan tanggal 20 Juni 2025 berdasarkan rekomendasi Dewan Komisaris dan Komite Audit, Bank menunjuk Yovita bersama Kantor Akuntan Publik Purwanto Susanti & Surja (*member of* Ernst & Young) yang terdaftar di Otoritas Jasa Keuangan sebagai auditor Laporan Keuangan Konsolidasian tahun buku 2025. Dalam pelaksanaannya, auditor tersebut menjalankan tugas secara independen, kompeten, profesional, dan objektif sesuai Standar Profesional Akuntan Publik, sehingga laporan keuangan Bank dapat disajikan secara wajar dan transparan.

Policy in Appointing Public Accountant

Referring to the provisions of Financial Services Authority Regulation No. 37/POJK.03/2019 on Transparency and Publication of Bank Reports and Financial Services Authority Regulation No. 9 of 2023 on the Use of Services of Public Accountant and Public Accounting Firm in Financial Services Activities, as well as Annual GMS resolutions dated 20 June 2025 based on the recommendations of the Board of Commissioners and Audit Committee, the Bank appointed Yovita together with Public Accounting Firm Purwanto Susanti & Surja (member of Ernst & Young), registered with the Financial Services Authority as auditor of the Consolidated Financial Statements for the 2025 fiscal year. In its implementation, the auditor carries out duties independently, competently, professionally, and objectively in accordance with Public Accountant Professional Standards, and therefore, the Bank's financial statements can be presented in a fair and transparent manner.

Periode Akuntan Publik dan Kantor Akuntan Publik

Bank senantiasa mematuhi ketentuan Peraturan Otoritas Jasa Keuangan No. 9 Tahun 2023 terkait penunjukan akuntan publik dan kantor akuntan publik. Sesuai regulasi, penggunaan akuntan publik dibatasi maksimal 7 (tujuh) tahun berturut-turut, sementara evaluasi terhadap kantor akuntan publik dilakukan oleh Komite Audit berdasarkan penilaian risiko. Pada tahun 2025, Bank menunjuk Akuntan Publik Yovita untuk yang kelima kalinya melalui Kantor Akuntan Publik Purwanto Susanti & Surja (*member of* Ernst & Young), dengan persetujuan Otoritas Jasa Keuangan sebagaimana tercantum dalam Surat No. 8091/PSS/2025 tanggal 12 November 2025.

Adapun daftar akuntan publik dan kantor akuntan publik yang digunakan Bank dalam 5 (lima) tahun terakhir sebagai berikut:

Period of Public Accountant and Public Accounting Firm

The Bank consistently complies with the provisions of Financial Services Authority Regulation No. 9 of 2023 on the appointment of public accountant and public accounting firm. According to regulations, the use of public accountant is limited to a maximum of 7 (seven) consecutive years, while evaluation of public accounting firm is conducted by the Audit Committee based on risk assessment. In 2025, the Bank appointed Public Accountant Yovita for the fifth time through Public Accounting Firm Purwanto Susanti & Surja (member of Ernst & Young), with the approval of the Financial Services Authority as stated in Letter No. 8091/PSS/2025 dated 12 November 2025.

The list of public accountants and public accounting firms used by the Bank in the past 5 (five) years is as follows:

Tahun Buku Fiscal Year	Kantor Akuntan Publik	Akuntan Publik Public Accountant	Nomor Izin Akuntan Publik Public Accountant License Number	Masa Kontrak Contract Period	Biaya Fee (Rp)
2025	Purwanto Susanti & Surja (*member of* Ernst & Young)	Yovita	AP. 0242	Januari-Desember January-December	2,050,000,000

Tahun Buku Fiscal Year	Kantor Akuntan Publik	Akuntan Publik Public Accountant	Nomor Izin Akuntan Publik Public Accountant License Number	Masa Kontrak Contract Period	Biaya Fee (Rp)
2024	Purwantono Sungkoro & Surja (*member of* Ernst & Young)	Yovita	AP. 0242	Januari-Desember January-December	1,720,000,000
2023					1,650,000,000
2022					2,320,000,000
2021					1,550,000,000

Jasa Non-Audit yang Diberikan Akuntan Publik

Pada tahun 2025, tidak terdapat jasa lain yang diberikan oleh Kantor Akuntan Publik Purwanto Susanti & Surja selain jasa audit Laporan Keuangan Tahun Buku 2025. Dengan demikian, tidak terdapat biaya yang dikeluarkan untuk jasa non-audit.

Non-Auditing Services Provided by Public Accountant

In 2025, there were no other services provided by Public Accounting Firm Purwanto, Susanti & Surja other than auditing services for Financial Statements for 2025 fiscal year. As such, there was no expense incurred for non-audit services.

Efektivitas Pelaksanaan Audit oleh Akuntan Publik

Komite Audit secara proaktif menjalin komunikasi dengan akuntan publik dan kantor akuntan publik yang ditunjuk sebelum audit dimulai untuk menyampaikan hal-hal yang menjadi fokus pengawasan. Setelah audit selesai, Komite Audit melakukan evaluasi atas pelaksanaan audit dan menyampaikan hasilnya kepada Otoritas Jasa Keuangan.

Effectiveness of Audit Implementation by Public Accountant

Audit Committee proactively communicates with the appointed public accountant and public accounting firm prior to the commencement of audit to convey matters of focus for oversight. Upon audit completion, Audit Committee evaluates audit implementation and submits the results to the Financial Services Authority.

Efektivitas Audit Eksternal dan Kepatuhan terhadap Ketentuan Hubungan dengan Akuntan Publik dan Otoritas Jasa Keuangan

Bank menerapkan fungsi audit eksternal secara efektif sebagai bagian dari upaya menjaga integritas, transparansi, dan keandalan laporan keuangan. Pelaksanaan audit eksternal dilakukan oleh akuntan publik dan/atau kantor akuntan publik yang independen, kompeten, serta terdaftar dan memenuhi ketentuan Otoritas Jasa Keuangan. Bank memastikan bahwa hubungan dengan akuntan publik dan/atau kantor akuntan publik dilaksanakan sesuai dengan prinsip independensi, objektivitas, dan profesionalisme, termasuk dalam proses penunjukan, ruang lingkup audit, serta komunikasi hasil audit. Selain itu, Bank mematuhi seluruh ketentuan yang mengatur hubungan antara Bank, akuntan publik dan/atau kantor akuntan publik, serta Otoritas Jasa Keuangan, termasuk kewajiban pelaporan dan penyampaian informasi secara tepat waktu. Hasil audit eksternal dimanfaatkan sebagai dasar evaluasi dan perbaikan berkelanjutan guna meningkatkan kualitas tata kelola dan pengendalian internal Bank.

Effectiveness of External Audit and Compliance with Provisions on Relationships with Public Accountant and Financial Services Authority

The Bank implements external audit function effectively as an effort to maintain integrity, transparency, and reliability of its financial statements. External audit is conducted by independent, competent, and registered public accountant and/or public accounting firm that comply with the requirements of Financial Services Authority. The Bank ensures that relationships with public accountant and/or public accounting firm are conducted in accordance with the principles of independence, objectivity, and professionalism, including in appointment process, audit scope, and communication of audit results. Furthermore, the Bank complies with all provisions governing the relationship between the Bank, public accountant and/or public accounting firm, and Financial Services Authority, including the obligation to report and submit information in a timely manner. The external audit results are used as a basis for evaluation and continuous improvement to enhance the quality of the Bank's governance and internal control.

Pengawasan dan Komunikasi Akuntan Publik dan Bank

Bank mewajibkan akuntan publik untuk mengomunikasikan rencana metodologi dan sampel audit kepada Komite Audit serta Auditor Internal sebelum proses audit dimulai. Selanjutnya, Komite Audit bersama Auditor Internal melakukan pengawasan atas kelancaran dan kesesuaian pelaksanaan audit eksternal, sekaligus mengevaluasi kualitas proses audit tersebut. Pemantauan kinerja akuntan publik dan kantor akuntan publik dibahas dalam rapat Komite Audit yang melibatkan Auditor Internal dan Direksi terkait, termasuk tindak lanjut atas temuan audit, sehingga hasil audit yang dihasilkan lebih komprehensif dan optimal.

Supervision and Communication of Public Accountant and the Bank

The Bank requires the public accountant to communicate the planned audit methodology and sample to the Audit Committee and Internal Auditor before the audit process begins. Furthermore, Audit Committee, together with Internal Auditor, oversees the smooth and appropriate implementation of external audit and evaluates the quality of audit process. Monitoring of the performance of public accountant and public accounting firm is discussed in Audit Committee meetings involving Internal Auditor and relevant Board of Directors, including follow-up on audit findings, resulting in more comprehensive and optimal audit results.

Sistem Pengendalian Internal

Internal Control System

Bank mengimplementasikan Sistem Pengendalian Intern (SPI) sebagai mekanisme utama untuk mendukung pencapaian tujuan, mengidentifikasi serta mengelola potensi risiko. SPI dirancang guna menjaga operasional yang sehat dan terkendali, melindungi aset Bank, memastikan keandalan pelaporan, meningkatkan kepatuhan, meminimalkan risiko kerugian maupun penyimpangan, serta mendorong efisiensi dan efektivitas operasional.

The Bank implements Internal Control System (SPI) as the primary mechanism to support the achievement of objectives and identify and manage potential risks. SPI is designed to maintain sound and controlled operations, protect Bank assets, ensure reporting reliability, enhance compliance, minimize the risk of loss or irregularities, and promote operational efficiency and effectiveness.

Ruang Lingkup Pengendalian Internal

Pelaksanaan SPI di Bank berpedoman pada Surat Edaran Otoritas Jasa Keuangan No. 35/SEOJK.03/2017 tentang Pedoman Standar Pengendalian Internal bagi Bank Umum. Implementasi SPI menjadi tanggung jawab seluruh jenjang organisasi dengan keterlibatan aktif setiap pihak, 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
   Bertanggung jawab mengevaluasi dan berperan aktif dalam meningkatkan efektivitas pengendalian

Internal Control Scope

SPI implementation at the Bank is guided by Financial Services Authority Circular No. 35/SEOJK.03/2017 on Guidelines for Internal Control Standards for Commercial Banks. SPI Implementation is the responsibility of all levels of the organization, with the active involvement of all parties, 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
   Responsible for evaluating and taking an active role in improving the effectiveness of internal control on

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.

Dewan Komisaris dan Direksi juga memiliki peran penting dalam memastikan komitmen, perilaku, kepedulian, dan penerapan pengendalian internal yang efektif di seluruh kegiatan operasional Bank. Sebagai bagian dari tanggung jawab ini, Dewan Komisaris dan Direksi menetapkan elemen-elemen penting dalam 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 HC Bank.
5. Atensi dan arahan manajemen Bank dan Komite lainnya, seperti Komite Pemantau Risiko.
6. Faktor-faktor eksternal yang memengaruhi operasional Bank dan penerapan manajemen risiko.

Berbagai faktor penting yang menjadi pertimbangan dalam menetapkan unsur-unsur lingkungan pengendalian dan mengimplementasikan pengendalian internal meliputi:
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.
6. Ketentuan dan peraturan perundang-undangan.

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.

The Board of Commissioners and Board of Directors also have an important role in ensuring effective commitments, behaviors, concerns, and implementation of internal controls throughout the Bank's operational activities. As part of this responsibility, the Board of Commissioners and Board of Directors established important elements in 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 HC policies and procedures.
5. Attention and direction of the Bank's management and other Committees, such as Risk Monitoring.
6. External factors affecting the Bank's operations and the risk management implementation.

Various important factors that are considered in establishing the elements of controlled environment and implementing internal control include:
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.
6. Provisions and laws and regulations.

Kesesuaian Pengendalian Internal dengan Kerangka COSO

Penerapan SPI di Bank bertujuan untuk menjamin efektivitas operasional, keandalan pelaporan, dan kepatuhan terhadap ketentuan yang berlaku. Kerangka SPI mengacu pada standar yang dikembangkan oleh *Committee of Sponsoring Organizations of the Treadway Commission* (COSO), yang membagi pengendalian internal ke dalam 5 (lima) komponen utama yang saling terintegrasi, yaitu:

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

Conformity of Internal Control with COSO Framework

SPI implementation at the Bank aims to ensure operational effectiveness, reporting reliability, and compliance with applicable regulations. SPI framework refers to the standards developed by the Committee of Sponsoring Organizations of the Treadway Commission (COSO), which divides internal control into 5 (five) main integrated components, namely:

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

Komponen Pengendalian Internal

Pengendalian internal di Bank terdiri atas 5 (lima) komponen yang saling terintegrasi, dengan penjelasan 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, menetapkan struktur organisasi, dan memastikan pemantauan efektivitas implementasi SPI.
   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 HC dengan menempatkan karyawan sesuai keterampilan, pengetahuan, dan perilaku.
   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.

Internal Control Components

The Bank's internal control consists of 5 (five) integrated components, as explained below:

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 main risks, determining the organizational structure, and ensuring the monitoring of the effectiveness of SPI implementation.
   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 HC by placing employees in accordance with their skills, knowledge, and behavior.
   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.

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. Rapat tersebut membahas Laporan Hasil Pemeriksaan Audit untuk kaji ulang hasil pemeriksaan rutin dan khusus.
   b. Kaji Ulang Kinerja Operasional
      SKAI secara rutin berkomunikasi dengan komite-komite di bawah Direksi, seperti ALCO, Komite Manajemen Risiko, dan Komite GCG untuk memastikan pengendalian internal pada level operasional.
   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.

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. Such meetings discuss the Audit Result Report to review the results of routine and special audits.
   b. Operational Performance Review
      SKAI 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. 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.

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. 031F/SK-DIR/05/23 tanggal 31 Mei 2023 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. 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.

Tinjauan atas Efektivitas Sistem Pengendalian Internal 2025

SPI Bank dirancang untuk mengelola risiko secara efektif, bukan menghilangkannya sepenuhnya. Pengawasan atas efektivitas SPI dilakukan oleh SKAI, dengan hasil evaluasi dilaporkan kepada Direksi serta disampaikan kepada Dewan Komisaris melalui Komite Audit. Pada tahun 2025, hasil evaluasi menunjukkan bahwa SPI Bank masih sejalan dengan prinsip pengendalian internal dan berfungsi dengan baik. Permasalahan terkait kecukupan pengendalian telah

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. 031F/SK-DIR/05/23 dated 31 May 2023 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. Internal auditor conducts operational and financial auditing checks in various Bank's offices, including credit, Third Party Funds (DPK), AML and CTF 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.

Overview of the Effectiveness of Internal Control System in 2025

The Bank's SPI is designed to effectively manage risk, not eliminate it completely. Oversight of SPI effectiveness is carried out by SKAI, with evaluation results reported to the Board of Directors and then submitted to the Board of Commissioners through Audit Committee. In 2025, the evaluation results indicated that the Bank's SPI remained in line with internal control principles and was functioning well. Issues related to the adequacy of control were dilaporkan kepada Direksi, dan langkah perbaikan telah dilakukan untuk meminimalkan risiko, yang selanjutnya juga dilaporkan kepada Dewan Komisaris melalui Komite Audit.

reported to the Board of Directors, and corrective measures were implemented to minimize risk, then reported to the Board of Commissioners through Audit Committee.

Pernyataan Dewan Komisaris dan Direksi atas Kecukupan Sistem Pengendalian Internal

Dewan Komisaris dan Direksi menegaskan bahwa sepanjang tahun 2025, Bank telah memiliki SPI yang efektif dan memadai dalam mengelola risiko. Seluruh risiko yang muncul tetap berada dalam batas toleransi, sehingga mendukung tercapainya tujuan Bank, antara lain melalui operasional yang efisien, penyajian Laporan Keuangan yang andal, perlindungan aset, serta kepatuhan terhadap ketentuan hukum dan peraturan yang berlaku.

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

The Board of Commissioners and Board of Directors confirmed that throughout 2025, the Bank had an effective and adequate SPI for managing risk. All risks emerging remained within tolerable limits, thus supporting the achievement of the Bank's objectives, including through efficient operations, reliable financial reporting, asset protection, and compliance with applicable laws and regulations.

Pengendalian Internal atas Pelaporan Keuangan
Internal Control over Financial Reporting

Bank Victoria menyampaikan Memorandum No. 004/ATF-DIR/I/2026 tanggal 13 Januari 2026 dari *Internal Control Over Financial Reporting* Departemen kepada *Director of Compliance & Risk Management* perihal Laporan Tahunan *Internal Control Over Financial Reporting* (ICOFR) Posisi 31 Desember 2025. Sehubungan dengan hal tersebut, Bank Victoria menerapkan ICOFR sebagai bagian dari sistem pengendalian internal yang dirancang untuk memastikan keandalan, keakuratan, dan transparansi laporan keuangan sesuai dengan standar akuntansi dan ketentuan peraturan perundang-undangan yang berlaku, termasuk Peraturan Otoritas Jasa Keuangan No. 15 Tahun 2024 tentang Integritas Pelaporan Keuangan Bank.

ICOFR dilaksanakan melalui identifikasi dan pengelolaan risiko salah saji material, baik akibat kesalahan maupun kecurangan, dengan penerapan pengendalian pada tingkat entitas dan proses, termasuk dukungan sistem teknologi informasi, serta dievaluasi secara berkala guna memastikan efektivitasnya dalam mendukung integritas pelaporan keuangan Bank Victoria.

Bank Victoria submits Memorandum No. 004/ATF-DIR/I/2026 dated 13 January 2026 from the Internal Control Over Financial Reporting Department to the Director of Compliance & Risk Management regarding the Annual Report of Internal Control Over Financial Reporting (ICOFR) Position as of 31 December 2025. In that regard, Bank Victoria implements ICOFR as part of its internal control system designed to ensure the reliability, accuracy, and transparency of financial statements in accordance with accounting standards and applicable laws and regulations, including Financial Services Authority Regulation No. 15 of 2024 on the Integrity of Bank Financial Reporting.

ICOFR is implemented through the identification and management of risks of material misstatement, either due to errors or fraud, through the implementation of controls at the entity and process levels, including information technology system support, and is periodically evaluated to ensure their effectiveness in supporting the integrity of Bank Victoria's financial reporting.

Pembentukan Unit dan Penguatan Kebijakan ICOFR

Pada Januari 2025, Bank Victoria telah membentuk *ICOFR Department* serta menetapkan Standar Operasional Prosedur (SOP) dan Kebijakan Integritas Pelaporan Keuangan sebagai landasan penerapan ICOFR di seluruh siklus pelaporan keuangan Bank. Pembentukan unit dan kebijakan tersebut merupakan wujud komitmen manajemen dalam memperkuat sistem pengendalian internal, memastikan konsistensi penerapan prinsip integritas, serta memberikan keyakinan memadai atas keandalan, keakuratan, dan transparansi laporan keuangan sesuai dengan ketentuan yang berlaku.

Establishment of ICOFR Unit and Strengthening of Financial Reporting Policy

In January 2025, Bank Victoria established an ICOFR Department and established the Standard Operating Procedures (SOPs) and Financial Reporting Integrity Policy as the basis for implementing ICOFR throughout the Bank's financial reporting cycle. The establishment of this unit and policy demonstrates the management's commitment to strengthening internal control system, ensuring consistent application of integrity principles, and providing reasonable assurance regarding the reliability, accuracy, and transparency of financial statements in accordance with applicable regulations.

Tanggung Jawab Dewan Komisaris dan Direksi atas ICOFR

Dalam menjalankan fungsi pengawasan, Dewan Komisaris melalui Komite Audit melakukan pemantauan dan evaluasi secara berkala atas penerapan kebijakan dan prosedur pengendalian internal dalam proses pelaporan keuangan, guna memastikan efektivitas sistem pengendalian serta integritas informasi keuangan Bank Victoria. Direksi bertanggung jawab atas penyusunan dan penyajian laporan keuangan sesuai dengan Standar Akuntansi Keuangan (SAK) di Indonesia serta ketentuan Otoritas Jasa Keuangan dan memastikan bahwa informasi yang disajikan dalam laporan keuangan lengkap, benar, serta bebas dari salah saji material.

Responsibility of the Board of Commissioners and Board of Directors for ICOFR

In carrying out its supervisory function, the Board of Commissioners, through the Audit Committee, regularly monitors and evaluates the implementation of internal control policies and procedures in the financial reporting process to ensure the effectiveness of control system and integrity of Bank Victoria's financial information. The Board of Directors is responsible for the preparation and presentation of financial statements in accordance with Indonesian Financial Accounting Standards (SAK) and the provisions of Financial Services Authority, and ensures that the information presented in the financial statements is complete, accurate, and free from material misstatement.

Hasil Tinjauan dan Evaluasi Penerapan ICOFR

ICOFR Department telah melakukan tinjauan ulang atas desain dan efektivitas pelaksanaan pengendalian pada proses transaksi, pembukuan, serta pelaporan keuangan di Divisi *Finance and Accounting*. Berdasarkan hasil evaluasi, terdapat kelemahan minor yang tidak berdampak material terhadap kewajaran penyajian laporan keuangan. Seluruh temuan telah ditindaklanjuti oleh unit terkait dan dimonitor oleh unit ICOFR hingga proses perbaikan dinyatakan selesai. Secara keseluruhan, pengendalian internal atas pelaporan keuangan Bank dinilai telah beroperasi secara efektif dan mampu memberikan keyakinan memadai atas keandalan laporan keuangan serta kepatuhan terhadap ketentuan yang berlaku.

Results of the Review and Evaluation of ICOFR Implementation

The ICOFR Department has reviewed the design and effectiveness of controls for transaction processing, bookkeeping, and financial reporting in the Finance and Accounting Division. Based on the evaluation results, there were minor weaknesses identified that did not materially impact the fairness of the presentation of the financial statements. All findings have been followed up by the relevant units and monitored by the ICOFR unit until the remedial process is declared complete. Overall, the Bank's internal control over financial reporting is considered to be operating effectively and providing reasonable assurance regarding the reliability of financial statements and compliance with applicable regulations.

Pelaporan Temuan dan Tindak Lanjut atas ICOFR

Seluruh permasalahan dan kelemahan pengendalian yang teridentifikasi dalam proses evaluasi ICOFR dilaporkan secara berkala kepada Direksi sebagai bagian dari mekanisme pengawasan dan penguatan tata kelola. Setiap temuan ditindaklanjuti secara konsisten oleh unit kerja terkait dengan pemantauan berkelanjutan hingga penyelesaiannya dinyatakan memadai, guna meminimalkan risiko serta memastikan kesesuaian dengan ketentuan internal dan regulasi yang berlaku.

Reporting of ICOFR Findings and Follow-up

All control issues and weaknesses identified during the ICOFR evaluation process are reported periodically to the Board of Directors as part of the oversight and governance strengthening mechanism. Every finding is consistently followed up by the relevant work unit through ongoing monitoring until its resolution is deemed adequate, to minimize risks and ensure compliance with internal provisions and applicable regulations.

Pernyataan atas Efektivitas ICOFR

Pada periode pelaporan tahun buku 2025, Bank Victoria menyatakan bahwa kerangka ICOFR telah dirancang secara memadai dan beroperasi secara efektif untuk mendukung keandalan pelaporan keuangan serta memastikan kepatuhan terhadap standar akuntansi dan ketentuan Otoritas Jasa Keuangan yang berlaku. Pernyataan ini disusun sebagai bagian dari komitmen Bank Victoria terhadap transparansi, akuntabilitas, dan integritas dalam penyampaian informasi kepada pemangku kepentingan melalui publikasi Laporan Tahunan.

Statement on ICOFR Effectiveness

For the 2025 fiscal year reporting period, Bank Victoria declared that the ICOFR framework was adequately designed and in operation effectively to support the reliability of financial reporting and ensure compliance with applicable accounting standards and Financial Services Authority regulations. This statement is prepared as part of Bank Victoria's commitment to transparency, accountability, and integrity in conveying information to stakeholders through the publication of Annual Report.

Fungsi Kepatuhan
Compliance Function

Fungsi Kepatuhan Bank berperan penting dalam memperkuat budaya kepatuhan sebagai bagian dari penerapan GCG. Fokus utamanya adalah upaya pencegahan terhadap risiko kepatuhan dengan memastikan seluruh kebijakan, prosedur, sistem, dan aktivitas usaha Bank senantiasa sejalan dengan peraturan Otoritas Jasa Keuangan serta ketentuan hukum yang berlaku, termasuk pemenuhan komitmen kepada regulator secara tepat waktu.

The Bank's Compliance Function plays a crucial role in strengthening a culture of compliance as part of GCG implementation. Its main focus is preventive measures against compliance risks by ensuring that all Bank policies, procedures, systems, and business activities are consistently in line with Financial Services Authority regulations and applicable laws, including timely fulfillment of commitments to regulators.

Pedoman Fungsi Kepatuhan

Fungsi Kepatuhan dijalankan berdasarkan ketentuan Peraturan Otoritas Jasa Keuangan No. 46/POJK.03/2017 tentang Pelaksanaan Fungsi Kepatuhan bagi Bank Umum, yang menjadi acuan utama dalam pelaksanaan tugas dan tanggung jawabnya.

Compliance Function Charter

The Compliance Function is implemented in accordance with Financial Services Authority Regulation No. 46/POJK.03/2017 on the Implementation of Compliance Function for Commercial Banks, which serves as the primary reference in performing its duties and responsibilities.

Penanggung Jawab Fungsi Kepatuhan

Untuk memastikan efektivitas penerapan Fungsi Kepatuhan, Bank telah menugaskan Direktur Kepatuhan dan Manajemen Risiko beserta Divisi *Compliance, System Procedure & Coordinator Customer Protection* sebagai pihak yang bertanggung jawab atas pelaksanaannya. Pengawasan atas fungsi tersebut dilakukan secara aktif oleh Dewan Komisaris, dengan pembagian tugas dan tanggung jawab masing-masing pihak sebagai berikut:

1. **Dewan Komisaris**
   a. Mengevaluasi pelaksanaan fungsi kepatuhan Bank paling sedikit 2 (dua) kali dalam setahun.
   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.
   g. Melakukan tugas lain yang terkait dengan fungsi kepatuhan.

   Terkait dengan pelaksanaan tata kelola, 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. 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.

Person in Charge of the Compliance Function

To ensure the effective implementation of Compliance Function, the Bank has assigned the Director of Compliance and Risk Management and the Compliance, System Procedure & Coordinator Customer Protection Division to be responsible for its implementation. Oversight of this function is actively carried out by the Board of Commissioners, with the division of duties and responsibilities of each party as follows:

1. **Board of Commissioners**
   a. Evaluating the implementation of the Bank's compliance function at least 2 (two) times a year.
   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.
   g. Performing other tasks associated with the compliance function.

   Related to the implementation of governance, the Director of Compliance and Risk Management who are appointed as the Director in Charge can formulate strategic steps to support and improve the effectiveness of compliance function implementation, risk management implementation, and governance implementation. Reporting of the implementation of duties and responsibilities of the compliance function to the regulator is conducted by the Director of Compliance and Risk Management, with copies to the Board of Commissioners at least on a quarterly basis.

3. **Divisi *Compliance, System Procedure & Coordinator Customer Protection***
   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 menginikan dan menyempurnakan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan.
   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.
   f. Melakukan tugas lain yang terkait dengan fungsi kepatuhan.

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

3. **Compliance, System Procedure & Coordinator Customer Protection 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 bythe Bank to be in accordance with the provisions of the Financial Services Authority and provisions of laws and regulations.
   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.
   f. Performing other tasks associated with the compliance function.

   The Compliance, System Procedure & Coordinator Customer Protection 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 & Coordinator Customer Protection
Profile of the Head of Compliance, System Procedure & Coordinator Customer Protection Division

R.R. UTAMI TJIPTO

Kepala Divisi *Compliance, System Procedure & Coordinator Customer Protection*

Head of Compliance, System Procedure & Coordinator Customer Protection Division

Kewarganegaraan / Nationality
Indonesia / Indonesian

Usia / Age
63 tahun / 63 years old

Tempat Lahir / Place of Birth
Jakarta

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.

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.

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).
- 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 Lembaga Sertifikasi Profesi Perbankan (2019).
- Sertifikasi Manajemen Risiko - *Qualified Chief Risk Officer* dari Lembaga Sertifikasi Profesi – Mitra Kalyana Sejahtera (2022).
- Sertifikasi Manajemen Risiko Jenjang 6 dari Lembaga Sertifikasi Profesi Perbankan (2024).

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

History of Previous
- 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).
- 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).
- Risk Management Certification Level 4 from Banking Profession Certification Institute (2019).
- Risk Management Certification - Qualified Chief Risk Officer from Professional Certification Institute – Mitra Kalyana Sejahtera (2022).
- Certification of Risk Management Level 6 from Banking Profession Certification Institution (2024).

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 2025

Selama tahun 2025, Fungsi Kepatuhan telah menjalankan berbagai aktivitas sebagai wujud pelaksanaan tugas dan tanggung jawabnya, dengan rincian sebagai berikut:
1. Menyusun dan memperbarui kebijakan serta prosedur sesuai dengan regulasi yang berlaku.
2. Memantau dan menindaklanjuti hasil pemeriksaan Otoritas Jasa Keuangan sesuai *target date* yang ditetapkan.
3. Bertindak sebagai *liaison* Bank dengan Otoritas Jasa Keuangan.
4. Melakukan kajian regulasi terhadap proposal kredit di atas nilai tertentu.
5. Menelaah aspek kepatuhan terhadap regulasi atas produk dan/atau aktivitas baru.
6. Melakukan kajian produk dan/atau aktivitas baru serta membuat *compliance checklist* produk dan/atau aktivitas baru.
7. Menyosialisasikan peraturan terbaru dari Otoritas Jasa Keuangan, Bank Indonesia, dan regulator lainnya, serta kebijakan dan standar operasional prosedur Bank, baik secara *online* maupun *offline*.
8. Menyelenggarakan *Focus Group Discussion* (FGD) atas Peraturan Otoritas Jasa Keuangan dan/atau Bank Indonesia.
9. Menunjuk *Compliance Champion* di setiap divisi dan cabang untuk meningkatkan budaya kepatuhan di seluruh lini Bank.

Brief Report on Implementation of Compliance Function's Activities in 2025

Throughout 2025, the Compliance Function carried out various activities as the manifestation of its duty and responsibility implementation with the following details:
1. Preparing and updating policies and procedures in accordance with applicable regulations.
2. Monitoring and following up on the results of the Financial Services Authority's audit according to the target date set.
3. Acting as the Bank liaison with the Financial Services Authority.
4. Conducting regulatory reviews of credit proposals above a certain threshold.
5. Reviewing aspects of regulatory compliance for new products and/or activities.
6. Reviewing new products and/or activities and creating compliance checklists for new products and/or activities.
7. Disseminating the latest regulations from Financial Services Authority, Bank Indonesia, and other regulators, as well as the Bank's policies and standard operating procedures, both online and offline.
8. Organizing Focus Group Discussions (FGD) on Financial Services Authority and/or Bank Indonesia Regulations.
9. Appointing Compliance Champions in each division and branch to enhance compliance culture across all lines of the Bank.

10. Mengadakan pelatihan tentang Peraturan Otoritas Jasa Keuangan terkait pelindungan konsumen bagi fungsi kerja pelindungan konsumen, Kepala Cabang, dan Kepala Operasional Cabang.
11. Mengirimkan pengingat kepada unit kerja terkait kewajiban pelaporan bulanan, triwulan, semester, dan tahunan.
12. Mengisi topik terkait GCG dan regulasi dalam rapat budaya yang diselenggarakan secara berkala.
13. Mengikuti pelatihan baik secara *online* maupun *offline* guna meningkatkan kompetensi di bidang kepatuhan.

Selain itu, Direktur Kepatuhan dan Manajemen Risiko juga telah menjalankan berbagai aktivitas sebagai wujud pelaksanaan tugas dan tanggung jawabnya dalam fungsi kepatuhan, dengan rincian sebagai berikut:

1. Menjalankan pedoman dan tata tertib terkait pengorganisasian Bank, pengaturan kewenangan dan prosedur keputusan.
2. Menjalankan rapat-rapat Direksi dibuktikan dengan notulen rapat.
3. Pelaksanaan kewenangan Direktur Kepatuhan dan Manajemen Risiko dalam mengelola Bank, dilakukan sesuai kewenangan yang diberikan dalam Anggaran Dasar, hasil RUPS, *BoD Charter*, dan regulasi yang berlaku.
4. Dalam pelaksanaan tugas dan tanggung jawabnya, Direktur Kepatuhan dan Manajemen Risiko senantiasa menerapkan prinsip-prinsip tata kelola pada seluruh tingkatan atau jenjang organisasi sebagaimana ketentuan yang berlaku dan secara berkesinambungan meningkatkan kinerja Bank.
5. Direktur Kepatuhan dan Manajemen Risiko tidak terdapat sanksi adminitratif dari regulator.

Pelatihan dan/atau Peningkatan Fungsi Kepatuhan

Pada tahun 2025, Fungsi Kepatuhan berpartisipasi dalam sejumlah program pelatihan dan pengembangan kompetensi, baik internal maupun eksternal, sebanyak 53 kali (lima puluh tiga) kali, dengan materi yang mencakup perlindungan data pribadi awareness, meningkatkan integritas Laporan Keuangan dan kepercayaan publik, layanan pengaduan, penguatan fungsi *Governance, Risk, and Compliance* (GRC) di sektor jasa keuangan, kebijakan insentif likuiditas makroprudensial, dan ketentuan mengenai giro wajib minimum.

10. Conducting training on Financial Services Authority Regulations related to consumer protection for consumer protection work functions, Branch Managers, and Branch Operations Managers.
11. Sending reminders to work units regarding monthly, quarterly, semi-annual, and annual reporting obligations.
12. Addressing topics related to GCG in cultural meetings held periodically.
13. Participating in training sessions, both online and offline, to improve competency in compliance.

Furthermore, the Director of Compliance and Risk Management has also carried out various activities to demonstrate the implementation of his duties and responsibilities in the compliance function, as detailed below:
1. Carrying out charter related to the Bank's organization, authority arrangements, and decision-making procedures.
2. Carrying out Board of Directors' meetings, evidenced by meeting minutes.
3. Implementing the authorities of Director of Compliance and Risk Management in managing the Bank in accordance with the authority granted in Articles of Association, results of the GMS, Board of Directors' Charter, and applicable regulations.
4. In implementing duties and responsibilities, the Director of Compliance and Risk Management consistently applies governance principles at all levels of the organization, in accordance with applicable regulations, and continuously improves the Bank's performance.
5. The Director of Compliance and Risk Management receive no administrative sanctions from regulators.

Compliance Function's Training and/or Development Programs

In 2025, the Compliance Function participated in a number of training and competency development programs, both internal and external, totaling 53 (fifty-three) times, with topics covering personal data protection awareness, enhancing the integrity of Financial Statements and public trust, complaints services, strengthening the Governance, Risk, and Compliance (GRC) function in financial services sector, macroprudential liquidity incentive policies, and regulations regarding minimum reserve requirements.

Tingkat Kepatuhan Bank

Bank secara konsisten menjaga tingkat kepatuhan yang tinggi terhadap seluruh ketentuan dan peraturan perundang-undangan yang berlaku, termasuk peraturan Otoritas Jasa Keuangan, Bank Indonesia, serta ketentuan otoritas lain yang relevan. Pelaksanaan fungsi kepatuhan dilakukan secara terstruktur dan independen melalui pemantauan kepatuhan atas kebijakan internal, aktivitas usaha, dan pelaksanaan komitmen Bank kepada otoritas yang berwenang. Sepanjang tahun pelaporan, Bank melakukan pemantauan, evaluasi, dan tindak lanjut atas pemenuhan ketentuan serta komitmen regulator secara berkelanjutan guna memastikan kegiatan usaha Bank berjalan sesuai prinsip kehati-hatian, tata kelola yang baik, dan ketentuan yang berlaku.

Pada tahun 2025, Bank telah melaporkan seluruh kewajiban pelaporan, termasuk tindak lanjut hasil pemeriksaan Otoritas Jasa Keuangan. Jumlah komitmen yang harus dilaporkan kepada Otoritas Jasa Keuangan sebanyak 496 komitmen dan telah selesai dilaporkan sesuai *target date.*

Bank Compliance Level

The Bank consistently maintains a high level of compliance with all applicable laws and regulations, including those of the Financial Services Authority, Bank Indonesia, and other relevant authorities. The compliance function is implemented in a structured and independent manner through monitoring compliance with internal policies, business activities, and the Bank's commitments to the relevant authorities. Throughout the reporting year, the Bank continuously monitored, evaluated, and followed up on compliance with regulatory requirements and commitments to ensure that the Bank's business activities were conducted in accordance with prudent principles, good governance, and applicable regulations.

In 2025, the Bank reported all reporting obligations, including follow-up actions on audit results from the Financial Services Authority. A total of 496 commitments were required to be reported to the Financial Services Authority, and these were completed by the target date.

Pengadaan Barang dan Jasa [POJK F.1]

Procurement of Goods and Services

Bank Victoria memiliki kebijakan pengadaan barang dan jasa sebagai pedoman bagi seluruh unit kerja dalam mendukung kelancaran operasional dan layanan kepada nasabah. Dalam pelaksanaannya, Bank dapat mengalihdayakan fungsi penunjang kepada pihak ketiga, dengan tetap menjunjung prinsip transparansi, objektivitas, perlakuan yang adil terhadap seluruh rekanan, serta pencegahan terhadap praktik yang tidak etis.

Bank Victoria has a goods and services procurement policy that serves as a guideline for all work units to support smooth operations and customer service. In its implementation, the Bank may outsource supporting functions to third parties, while upholding the principles of transparency, objectivity, fair treatment of all partners, and prevention of unethical practices.

Etika Pengadaan Barang dan Jasa

Pelaksanaan pengadaan barang dan jasa di Bank mengacu pada Keputusan Direksi No. 024A/SK-DIR/02/23 tanggal 24 Februari 2023 tentang Pedoman Kode Etik Perilaku Karyawan PT Bank Victoria International Tbk. Pedoman ini menjadi landasan dalam menjaga integritas hubungan antara karyawan dan rekanan maupun calon rekanan, dengan berpegang pada prinsip-prinsip berikut:

Ethics of Procurement of Goods and Services

The implementation of goods and services procurement at the Bank refers to Board of Directors' Decision No. 024A/SK-DIR/02/23 dated 24 February 2023 on Employee's Code of Conduct of PT Bank Victoria International Tbk. These guidelines serve as the basis for maintaining the integrity of relationships between employees and partners, as well as potential partners, by adhering to the following principles:

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

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.
5. Vendors must follow the regulations regarding the procurement of goods and services applicable at Bank Victoria.

Pengadaan Barang dan Jasa Tahun 2025

Pada tahun 2025, realisasi pengadaan barang dan jasa Bank tercatat sebesar Rp76.910.546.203,- dengan jumlah kegiatan pengadaan sebanyak 13 (tiga belas) kegiatan.

Procurement of Goods and Services in 2025

In 2025, the Bank's procurement of goods and services was recorded at Rp76,910,546,203.- with a total of 13 (thirteen) procurement activities.

Perkara Hukum
Legal Cases

Sepanjang tahun 2025, perkara hukum yang dihadapi Bank sebagai berikut:

Throughout 2025, the legal cases faced by the Bank were 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	-	1
Dalam Proses Penyelesaian In Settlement Process	14	-	-
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	**16**	**-**	**1**

Perkara Hukum yang Dihadapi Bank Victoria Tahun 2025
Legal Cases Faced by Bank Victoria in 2025

Perkara **No. 107/Pdt.G/2024/PN Jkt.Sel** **Case**		**Perkara** **No. 107/Pdt.G/2024/PN Jkt.Sel** **Case**	
Para Pihak Parties	**Penggugat:** **Plaintiff:** PT Iswara Dewata. **Tergugat:** **Defendants:** • PT Bank Victoria International Tbk. • Kantor Pelayanan Kekayaan Negara dan Lelang Kota Denpasar. • State Assets and Auction Service Office of Denpasar City.	**Para Pihak** Parties	**Penggugat:** **Plaintiff:** PT Iswara Dewata. **Tergugat:** **Defendants:** PT Bank Victoria International Tbk.
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**	Immateriil / Immaterial: Rp1.000.000.000.000,-.	**Nilai Nominal Gugatan** **Nominal Value of Claim**	Material: Rp219.483.844.757,- dan / and: USD11.600.000.
Status Penyelesaian Perkara **Case Settlement Status**	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.	**Status Penyelesaian Perkara** **Case Settlement Status**	Immateriil / Immaterial: USD201.448.631,91 dan / and Rp8.000.000.000.000,-.
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**	Dalam pemeriksaan perkara di Pengadilan Negeri Jakarta Selatan. On case examination at South Jakarta District Court.
Sanksi Administrasi **Administrative Sanctions**	Belum ada. None yet.	**Sanksi Administrasi** **Administrative Sanctions**	Belum ada. None yet.

Perkara **No. 334/Pdt.G/2025/PN Dps** **Case**		**Perkara** **No. 1188/Pdt.G/2024/PN Jkt.Pst** **Case**	
Para Pihak Parties	**Penggugat:** **Plaintiff:** PT Tunas Jaya Sanur. **Tergugat:** **Defendants:** • Kantor Pelayanan Kekayaan Negara dan Lelang Kota Denpasar. • State Assets and Auction Service Office of Denpasar City. • PT Bank Victoria International Tbk. • PT Iswara Dewata.	**Para Pihak** Parties	**Penggugat:** **Plaintiff:** PT Inet Global Indo. **Tergugat:** **Defendants:** PT Bank Victoria International Tbk.
Pokok Perkara **Case Profile**	Gugatan perlawanan. Counter claim.	**Pokok Perkara** **Case Profile**	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.
Nilai Nominal Gugatan **Nominal Value of Claim**	Material: Rp14.327.446.456,17.	**Nilai Nominal Gugatan** **Nominal Value of Claim**	Material: Rp 93.462.000.000,-.
Status Penyelesaian Perkara **Case Settlement Status**	Dalam pemeriksaan perkara di Pengadilan Negeri Denpasar. On case examination at Denpasar District Court.	**Status Penyelesaian Perkara** **Case Settlement Status**	Immateriil / Immaterial: Rp2.000.000.000,-.
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**	Dalam pemeriksaan perkara di Pengadilan Tinggi Jakarta. On case examination at Jakarta High Court.

Perkara No. 334/Pdt.G/2025/PN Dps Case		Perkara No. 1188/Pdt.G/2024/PN Jkt.Pst Case	
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.	**Sanksi Administrasi** Administrative Sanctions	Belum ada. None yet.

Perkara No. 727/Pdt.G/2025/PN.Jkt.Pst Case		Perkara No. 525/Pdt.G/2024/PN Jkt.Pst Case	
Para Pihak Parties	**Penggugat:** Plaintiff: Sukoco Halim. **Tergugat:** Defendants: • PT Inet Global Indo. • Kantor Pelayanan Kekayaan Negara dan Lelang Jakarta III. • State Assets and Auction Service Office of of Jakarta III.	**Para Pihak** Parties	**Penggugat:** Plaintiff: Sucik Mardi. **Tergugat:** Defendants: PT Bank Victoria International Tbk.
Pokok Perkara Case Profile	Gugatan perlawanan. Counter claim.	**Pokok Perkara** Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.
Nilai Nominal Gugatan Nominal Value of Claim	-	**Nilai Nominal Gugatan** Nominal Value of Claim	Material: Rp100.000.000,-.
Status Penyelesaian Perkara Case Settlement Status	Dalam pemeriksaan perkara di Pengadilan Negeri Jakarta Selatan. On case examination at outh Jakarta District Court.	**Status Penyelesaian Perkara** Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.
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 No. 727/Pdt.G/2025/PN.Jkt.Pst Case		Perkara No. 525/Pdt.G/2024/PN Jkt.Pst Case	
Para Pihak Parties	**Penggugat:** Plaintiff: Sigit Hartono. **Tergugat:** Defendants: • PT Bank Victoria International Tbk. • PT Bank Victoria International Tbk (KCP Muara Karang).	**Para Pihak** Parties	**Penggugat:** Plaintiff: Firzia Resita. **Tergugat:** Defendants: • PT Bank Victoria International Tbk. • Kantor Pelayanan Kekayaan Negara dan Lelang Tangerang II. • State Assets and Auction Service Office of Tangerang II. • PT Matador Lelang Sukses.
Pokok Perkara Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.	**Pokok Perkara** Case Profile	Gugatan perlawanan. Counter claim.
Nilai Nominal Gugatan Nominal Value of Claim	• Material : Rp 5.896.728.000,-. • Immateriil / Immaterial: Rp 470.000.000,-	**Nilai Nominal Gugatan** Nominal Value of Claim	Material dan Immateriil / and Immate-rial: Rp2.400.000.000,-.
Status Penyelesaian Perkara Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.	**Status Penyelesaian Perkara** Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.

Perkara No. 727/Pdt.G/2025/PN.Jkt.Pst Case		Perkara No. 525/Pdt.G/2024/PN Jkt.Pst Case	
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 No. 727/Pdt.G/2025/PN.Jkt.Pst Case		Perkara No. 525/Pdt.G/2024/PN Jkt.Pst Case	
Para Pihak Parties	**Penggugat:** Plaintiff: Sufendi **Tergugat:** Defendants: PT Bank Victoria International Tbk.	**Para Pihak** Parties	**Penggugat:** Plaintiff: Ismail Chamdani, dan kawan-kawan. Ismail Chamdani, and fellows **Tergugat:** Defendants: • Badan Pertanahan Nasional Jakarta Selatan. • South Jakarta National Land Agency. • PT Papan Utama Indonesia. • PT Bank Victoria International Tbk.
Pokok Perkara Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.	**Pokok Perkara** Case Profile	Gugatan pertanahan. Land dispute lawsuit.
Nilai Nominal Gugatan Nominal Value of Claim	• Material : Rp2.645.142.036,42. • Immateriil / Immaterial: Rp3.000.000.000,-.	**Nilai Nominal Gugatan** Nominal Value of Claim	-
Status Penyelesaian Perkara Case Settlement Status	Pemohon kasasi mencabut permohonan kasasi karena sudah ada upaya damai. The cassation petitioner withdrew the cassation petition due to the existence of amicable efforts.	**Status Penyelesaian Perkara** Case Settlement Status	Majelis Hakim pada Mahkamah Agung Republik Indonesia telah memutus perkara ini. The Panel of Judges at the Supreme Court of the Republic of Indonesia has ruled on this case.
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 No. 395/Pdt.G/2025/PN Jkt.Pst Case		Perkara No. 202/Pdt.Bth/2024/PN Jkt.Brt Case	
Para Pihak Parties	**Penggugat:** Plaintiff: • YPKKP Bandung. • Riska Nurasyiah. • Rinalwan Buchari, MBA. **Tergugat:** Defendants: • PT Bank Victoria International Tbk. • PT Corex Intek Indonesia.	**Para Pihak** Parties	**Penggugat:** Plaintiff: Ir Bara Frontasia dan kawan-kawan. Ir Bara Frontasia and fellows. **Tergugat:** Defendants: • PT Karya Technik Multifinance. • PT Wellman Denyo. • PT Bank Victoria International Tbk. • Kantor Pelayanan Kekayaan Negara dan Lelang Jakarta V. • State Assets and Auction Service Office of Jakarta V.

Perkara No. 395/Pdt.G/2025/PN Jkt.Pst Case		Perkara No. 202/Pdt.Bth/2024/PN Jkt.Brt Case	
Pokok Perkara Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.	**Pokok Perkara** Case Profile	Gugatan perlawanan. Counter claim.
Nilai Nominal Gugatan Nominal Value of Claim	• Material : Rp6.077.079.809,50. • Immateriil / Immaterial: Rp1.000.000.000,-.	**Nilai Nominal Gugatan** Nominal Value of Claim	-
Status Penyelesaian Perkara Case Settlement Status	Dalam pemeriksaan perkara di Pengadilan Negeri Jakarta Pusat. On case examination at Central Jakarta District Court.	**Status Penyelesaian Perkara** Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.
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 No. 1074/Pdt.Bth/2024/PN Dps Case		Perkara No. 954/Pdt.G/2023/PN Dps Case	
Para Pihak Parties	**Penggugat:** Plaintiff: • Lim Wan Seng. • Dr Anner Mangatur Sianipar, SH, MH, CTA. **Tergugat:** Defendants: • Firman Handoko. • Metha Meilina. • PT Tata Pesona Indonesia. • PT Bank Victoria International Tbk. • Johanes Chorman/Johanes/Aping Johanes Chorman. • PT Central Indonesia. • Suwarni Sukiman, SH.	**Para Pihak** Parties	**Penggugat:** Plaintiff: Johanes Chorman/Johanes/Aping Johanes Chorman. **Tergugat:** Defendants: • Firman Handoko. • PT Tata Pesona Indonesia. **Turut Tergugat:** Co-Defendant: PT Bank Victoria International Tbk.
Pokok Perkara Case Profile	Gugatan perlawanan pihak ketiga. Third party counter claim.	**Pokok Perkara** Case Profile	Gugatan wanprestasi. Default lawsuit.
Nilai Nominal Gugatan Nominal Value of Claim	Material: Rp30.000.000.000,-.	**Nilai Nominal Gugatan** Nominal Value of Claim	Material: Rp25.400.000.000,-.
Status Penyelesaian Perkara Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.	**Status Penyelesaian Perkara** Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.
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 No. 703/Pdt.G/2024/PN Jkt.Tim Case		Perkara No. 606/Pdt.G/2024/PN Jkt.Pst Case	
Para Pihak Parties	**Penggugat:** Plaintiff: Ir Zulmarlyan. **Tergugat:** Defendants: • Alin Taslim. • PT Bank Victoria International Tbk. • Kantor Pelayanan Kekayaan Negara dan Lelang Jakarta III. • State Assets and Auction Service Office of of Jakarta III.	**Para Pihak** Parties	**Penggugat:** Plaintiff: Liu Ket Men. **Tergugat:** Defendants: • PT Bank Victoria International Tbk. • Kantor Pelayanan Kekayaan Negara dan Lelang Jakarta III. • State Assets and Auction Service Office of of Jakarta III.
Pokok Perkara Case Profile	Gugatan perlawanan pihak ketiga. Third party counter claim.	**Pokok Perkara** Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.
Nilai Nominal Gugatan Nominal Value of Claim	• Material : Rp1.400.000.000,-. • Immateriil / Immaterial: Rp1.000.000.000,-.	**Nilai Nominal Gugatan** Nominal Value of Claim	Material: Rp5.000.000.000,-.
Status Penyelesaian Perkara Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Pengadilan Tinggi Jakarta. On case examination at Jakarta High Court.	**Status Penyelesaian Perkara** Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.
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 No. 1164/Pdt.G/2023/PN Sby Case	
Para Pihak Parties	**Penggugat:** Plaintiff: Susanto. **Tergugat:** Defendants: • PT Bank Victoria International Tbk. • PT Properindo Gemilang Makmur.
Pokok Perkara Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.
Nilai Nominal Gugatan Nominal Value of Claim	-
Status Penyelesaian Perkara Case Settlement Status	Majelis Hakim pada Mahkamah Agung Republik Indonesia telah memutus perkara ini The Panel of Judges at the Supreme Court of the Republic of Indonesia has ruled on this case.
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 Administratif
Administrative Sanctions

Pada tahun 2025, anggota Dewan Komisaris dan anggota Direksi tidak menerima sanksi administrasi, baik dari regulator, perpajakan, maupun perbankan. Sementara itu, Bank Victoria menerima sanksi finansial sebesar Rp385.700.000,- dari Bank Indonesia dan Otoritas Jasa Keuangan.

In 2025, members of Board of Commissioners and members of Board of Directors did not receive any administrative sanctions from regulators, tax authorities, or banks. Meanwhile, Bank Victoria received a financial sanction of Rp385,700,000 from Bank Indonesia and Financial Services Authority.

Program Anti-Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal [POJK F.1]
Anti-Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction Program

Penerapan program Anti-Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (APU, PPT, dan PPPSPM) merupakan kewajiban yang melekat pada seluruh penyedia jasa keuangan, termasuk Bank. Kewajiban ini menjadi semakin penting seiring dengan berkembangnya modus kejahatan yang memanfaatkan layanan perbankan untuk tindak pidana pencucian uang, pendanaan terorisme, maupun proliferasi senjata pemusnah massal. Bank telah melaksanakan program APU, PPT, dan PPPSPM dengan pendekatan berbasis risiko, disertai kewajiban pelaporan kepada Pusat Pelaporan dan Analisis Transaksi Keuangan (PPATK) sebagai *Financial Intelligence Unit* (FIU). Adapun langkah-langkah yang ditempuh Bank dalam penerapan program tersebut sebagai berikut:

1. Pengawasan Aktif Direksi dan Dewan Komisaris terhadap Program APU, PPT, dan PPPSPM Direksi Bank memastikan efektivitas penerapan Prinsip APU, PPT, dan PPPSPM melalui:
    a. Mengusulkan kebijakan dan prosedur tertulis mengenai penerapan program APU, PPT, dan PPPSPM kepada Dewan Komisaris.

The implementation of Anti-Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction (AML, CTF, and CPF) programs is an inherent obligation of all financial service providers, including the Bank. This obligation has become increasingly important in line with the growing number of criminal methods that exploit banking services for money laundering, terrorist financing, and proliferation of weapons of mass destruction. The Bank has carried out AML, CFT, and CPF programs by using risk-based approach, along with mandatory reporting to the Financial Transaction Reports and Analysis Center (PPATK) as the Financial Intelligence Unit (FIU). The measures taken by the Bank in implementing such programs are as follows:

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. Memastikan penerapan program APU, PPT, dan PPPSPM 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 PPPSPM.
d. Melakukan pengawasan atas kepatuhan unit kerja dalam menerapkan program APU, PPT, dan PPPSPM.
e. Memastikan bahwa kebijakan dan prosedur tertulis mengenai penerapan program APU, PPT, dan PPPSPM 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 PPPSPM sebanyak 1 (satu) kali dalam 1 (satu) tahun.
g. Memastikan adanya pembahasan terkait penerapan program APU, PPT, dan PPPSPM dalam rapat Direksi.

Dewan Komisaris bertanggung jawab untuk:
a. Memastikan Bank memiliki kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM.
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.
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,

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.
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. 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.
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 Owner (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 terrorist financing risks based on a risk-based approach concerning customers, geographical areas/countries,

negara/area geografis, produk, jasa dan transaksi, serta jaringan distribusi (*delivery channels*).

e. Pemantauan dan penginian.
f. *Cross border correspondent banking*.
g. Transfer dana.
h. Penatausahaan dokumen.
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*.
   c. Melakukan pemeriksaan untuk memastikan efektivitas pelaksanaan program APU, PPT, dan PPPSPM oleh SKAI.
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 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.
   c. Mengembangkan aplikasi Sistem Informasi Pengguna Jasa Terpadu (SIPESAT) PPATK.
5. HC dan pelatihan
   Bank menyelenggarakan program pelatihan yang berkesinambungan dan berkala paling sedikit 1 (satu) kali dalam 1 (satu) tahun untuk memastikan HC 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.

products, services and transactions, as well as delivery channels.

e. Monitoring and updating.
f. Cross-border correspondent banking.
g. Fund transfers.
h. Document administration.
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.
   c. Conducting audits to ensure the effective implementation of the AML, CTF, and CPF programs. The audits are conducted by SKAI.
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), 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, terrorist financing, and proliferation of weapons of mass destruction financing behavior.
   b. Developing PPATK's Suspected Terrorism Financing Information System (SIPENDAR) application.
   c. Developing PPATK's Integrated Service User Information System (SIPESAT) application.
5. HC and training
   The Bank organizes regular and continuous training programs at least once a year to ensure that its HC 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 terrorist 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, terrorist financing, and financing the proliferation of weapons of mass destruction.

Sepanjang tahun 2025, Bank semakin memperkuat implementasi program APU, PPT, dan PPPSPM melalui peningkatan kompetensi SDM, optimalisasi sistem SmartAML, serta pengembangan teknologi yang adaptif terhadap pertumbuhan transaksi digital, sehingga mendukung pengelolaan risiko TPPU, TPPT, dan TPPPSPM secara lebih efektif serta mengantarkan Bank meraih predikat "Sangat Baik" selama 4 (empat) tahun berturut-turut dalam penilaian Financial Integrity Rating (FIR) on ML/TF oleh PPATK.

Throughout 2025, the Bank further strengthened the implementation of AML, CTF, and CPF program by improving HC competencies, optimizing SmartAML system, and developing technology that adapted to the growth of digital transactions. This supported more effective management of TPPU, TPPT, and TPPPSPM risks and led to the Bank achieving a "Very Good" rating for 4 (four) consecutive years in Financial Integrity Rating (FIR) on ML/TF assessment by PPATK.

Financial Integrity Rating on Money Laundering/Terrorism Financing

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.
3. Dimensi 3 (tiga) untuk mengukur tingkat kepatuhan pihak pelapor terhadap kewajiban pelaporan APU dan PPT kepada PPATK serta kualitas formal dan material 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 2025 sebesar 9,33 yang dikontribusikan oleh dimensi 1 (satu) sebesar 9,81, dimensi 2 (dua) sebesar 10,00, dan dimensi 3 (tiga) sebesar 8,97. 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.

Financial Integrity Rating on Money Laundering/Terrorist Financing

The Financial Integrity Rating on Money Laundering and Terrorist Financing (FIR on ML/TF) is an assessment of the integrity and effectiveness of the reporting party in implementing AML and CTF 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.
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 2025, Bank Victoria obtained FIR on ML/TF value of 9.33 contributed by dimension 1 (one) at 9.81 dimension 2 (two) at 10.00, and dimension 3 (three) at 8.97. 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 category.

Pemberian Dana Kegiatan Politik dan Tanggung Jawab Sosial [POJK F.1]

Provision of Funds for Political Activities and Social Responsibility

Bank berkomitmen menjaga independensi dan profesionalisme dalam menjalankan kegiatan usaha dengan tidak menyalurkan dana Bank untuk kegiatan politik, sebagaimana diatur dalam Kode Etik Bank. Meskipun demikian, Bank menghormati hak setiap karyawan untuk mengekspresikan aspirasi politik secara pribadi sepanjang dilakukan sesuai dengan ketentuan yang berlaku dan tidak menimbulkan benturan kepentingan maupun mengganggu pelaksanaan tugas dan tanggung jawabnya.

Selain itu, Bank menetapkan kebijakan yang memastikan alokasi dan penggunaan dana tanggung jawab sosial dan lingkungan (TJSL) dilakukan secara independen dan bebas dari pengaruh kepentingan pribadi pihak mana pun, baik dari internal Bank termasuk Pemegang Saham, Direksi, Dewan Komisaris, Pejabat Eksekutif, dan pegawai maupun dari pihak eksternal, seperti vendor dan pihak lain di luar Bank. Kebijakan ini diterapkan untuk menjamin bahwa pemanfaatan dana TJSL semata-mata ditujukan bagi kepentingan sosial dan keberlanjutan, serta sejalan dengan prinsip GCG.

Sebagai wujud penerapan prinsip transparansi, Bank melakukan pengungkapan atas pemberian dana untuk kegiatan sosial, termasuk dalam rangka penerapan keuangan berkelanjutan, dan memastikan bahwa setiap pengungkapan paling sedikit mencakup informasi mengenai pihak penerima dana dan jumlah dana yang diberikan, sesuai dengan ketentuan peraturan perundang-undangan yang berlaku.

The Bank is committed to maintaining independence and professionalism in performing its business activities by not lending Bank funds for political activities, as stated in the Bank's Code of Conduct. Nevertheless, the Bank respects the right of all employee to express their personal political aspirations as long as they comply with applicable regulations and do not create a conflict of interest or interfere with the performance of their duties and responsibilities.

Furthermore, the Bank has established a policy that ensures the allocation and use of social and environmental responsibility (TJSL) funds are carried out independently and free from the influence of personal interests of any party, both internally within the Bank, including Shareholders, Board of Directors, Board of Commissioners, Executive Officers, and employees, and externally, such as vendors and other parties outside the Bank. This policy is implemented to ensure that the use of TJSL funds is solely for social and sustainability interests, and in line with GCG principles.

As the manifestation of the principle of transparency, the Bank discloses the provision of funds for social activities, including those related to the implementation of sustainable finance, and ensures that each disclosure includes at least information regarding the recipient of funds and the amount of funds provided, in accordance with applicable laws and regulations.

Persaingan Usaha yang Sehat [POJK F.1]

Fair Business Competition

Dalam menjalankan operasionalnya, Bank Victoria berkomitmen menjunjung tinggi etika bisnis dan persaingan usaha yang sehat. Bank senantiasa mematuhi ketentuan Undang-Undang Anti-Monopoli, melakukan kajian pasar untuk memahami dinamika kompetisi, serta berfokus pada peningkatan mutu produk dan layanan. Bank juga berkomitmen melindungi kepentingan nasabah dari praktik usaha yang tidak adil. Terkait Hak Kekayaan Intelektual (HAKI), Bank mendorong seluruh jajaran untuk menghormati karya pihak lain, berinovasi dalam pengembangan produk dan proses, serta menjaga HAKI yang dimiliki Bank.

In carrying out its operations, Bank Victoria is committed to upholding business ethics and fair competition. The Bank consistently complies with the provisions of Anti-Monopoly Law, conducts market research to understand competitive dynamics, and focuses on improving the quality of its products and services. The Bank is also committed to protecting customer interests from unfair business practices. Regarding Intellectual Property Rights (IPR), the Bank encourages all employees to respect other parties' works, innovate in product and process development, and safeguard the Bank's IPR.

Kode Etik [POJK F.1] [G-07]

Code of Conduct

Bank berkomitmen untuk menegakkan standar etika tertinggi dalam setiap aktivitas operasional. Komitmen tersebut diwujudkan melalui penerapan Kode Etik yang ditetapkan berdasarkan Keputusan Direksi No. 024A/SK-DIR/02/23 tanggal 24 Februari 2023. Kode Etik ini berfungsi sebagai pedoman perilaku bagi seluruh insan Bank dalam menjalankan tugasnya, sehingga setiap tindakan yang diambil senantiasa selaras dengan prinsip profesionalisme, integritas, serta kepatuhan terhadap Visi, Misi, Nilai-Nilai Perusahaan, dan ketentuan peraturan yang berlaku, baik internal maupun eksternal.

The Bank is committed to upholding the highest ethical standards in all operational activities. Such commitment is realized through the implementation of Code of Conduct established by the Board of Directors' Decision No. 024A/SK-DIR/02/23 dated 24 February 2023. This Code of Conduct serves as a guideline for the conduct of all Bank employees in performing their duties, ensuring that every action taken is always in line with the principles of professionalism, integrity, and compliance with the Company's Vision, Mission, Values, and applicable regulations, both internal and external.

Pokok Isi Kode Etik

Pokok isi Kode Etik Bank Victoria sebagai berikut:

Principles of Code of Conduct

The principles of Bank Victoria's Code of Conduct are as follows

1. Standar Etika Bisnis
Standard Business Ethics

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.
h. Etika Bank dengan organisasi profesi.

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.
h. Bank's Ethics with professional organizations.

2. Standar Perilaku Karyawan
Standard Code of Conduct

a. Tuntunan perilaku karyawan.	a. Employee behavior guidelines.
b. Penanganan benturan kepentingan.	b. Management of conflict of interest.
c. Pedoman pemberian dan penerimaan hadiah dan donasi.	c. Guidelines for giving and receiving gifts and donations.
d. Pedoman kepatuhan terhadap peraturan.	d. Regulatory compliance guidelines.
e. Pedoman menjaga kerahasiaan data dan informasi perusahaan.	e. Guidelines for maintaining confidentiality of company data and information.
f. Pedoman aktivitas politik.	f. Political activity guidelines.
g. Pedoman pelaporan atas pelanggaran dan perlindungan pelapor.	g. Guidelines for reporting violations and protection of whistleblower.

Komitmen Kepatuhan Terhadap Kode Etik

Penerapan Kode Etik mencakup seluruh jenjang organisasi, mulai dari Dewan Komisaris, Direksi, Pejabat Eksekutif, hingga seluruh karyawan. Setiap individu diwajibkan untuk memahami secara menyeluruh isi Kode Etik dan menunjukkan komitmennya melalui penandatanganan Surat Pernyataan yang tercantum pada bagian akhir dokumen tersebut.

Commitment to Complying with Code of Conduct

The implementation of Code of Conduct covers all levels of the organization, from the Board of Commissioners, Board of Directors, Executive Officers, and all employees. Every individual is required to thoroughly understand the Code of Conduct and demonstrate commitment by signing the Statement Letter included at the end of the document.

Penyebarluasan dan Sosialisasi Kode Etik

Bank secara konsisten memastikan pemahaman Kode Etik tertanam kuat di seluruh jajaran melalui berbagai bentuk sosialisasi. Kode Etik tersedia dalam media internal yang dapat diakses kapan saja, dilengkapi dengan komunikasi rutin berupa memo atau surat dari Direksi maupun Divisi terkait. Selain itu, setiap karyawan dibekali buku saku Kode Etik sebagai referensi praktis dalam menjalankan tugas sehari-hari. Pemahaman tersebut juga diperkuat melalui program pelatihan, kegiatan induksi bagi karyawan baru, hingga forum pembelajaran bersama yang melibatkan pihak eksternal.

Circulation and Dissemination of Code of Conduct

The Bank consistently ensures that understanding of the Code of Conduct is firmly embedded throughout all levels through various forms of dissemination. Code of Conduct is available on internal media that is accessible at any time, supplemented by regular communications in the form of memos or letters from the Board of Directors and relevant Divisions. Furthermore, each employee is provided with the Code of Conduct pocket book as a practical reference in performing daily duties. This understanding is also reinforced through training programs, induction activities for new employees, and collaborative learning forums involving external parties.

Upaya Penerapan dan Penegakan Kode Etik

Penerapan dan Penegakan secara Organisasi

1. Dewan Komisaris dibantu oleh Komite Remunerasi dan Nominasi 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.

Efforts to Implement and Enforce Code of Conduct

Organizational Implementation and Enforcement

1. The Board of Commissioners, supported by the Remuneration and Nomination 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. Direksi menunjuk Kepala Divisi *Human Capital Management & General Affair* beserta jajarannya yang bertanggung jawab untuk melaporkan pelanggaran terhadap pelaksanaan Kode Etik.
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.*

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.
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.

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.
4. Pemberian sanksi bagi pelaku penyimpangan Pedoman Kode Etik Perilaku Karyawan.
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.

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 indepth 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. The imposition of sanction for the party violating the Employee's Code of Conduct.
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 terhadap Kode Etik diperlakukan sebagai hal yang serius dan akan dikenakan sanksi sesuai tingkatannya. Penentuan sanksi dilakukan dengan mempertimbangkan jenis pelanggaran, tingkat keseriusan, serta evaluasi atas individu yang bersangkutan. Untuk kategori pelanggaran ringan, sanksi dapat berupa teguran lisan hingga surat peringatan pertama, yang dapat ditingkatkan menjadi surat peringatan kedua dan ketiga apabila pelanggaran terus berulang. Dalam kasus tertentu, pelanggaran ringan yang dilakukan secara berulang dapat berujung pada pengunduran diri.

Forms and Types of Sanction

Violations of the Code of Conduct are treated as serious matters and will be subject to appropriate sanctions. Sanctions are determined by considering the type of violation, its seriousness, and evaluation on the individual concerned. For minor violation, sanction can range from a verbal warning to first warning letter, which can be escalated to second and third warning letter if the violation is repeated. In certain cases, repeated minor violations can lead to resignation.

Sementara itu, pelanggaran pada tingkat sedang dikenakan sanksi mulai dari surat peringatan pertama, yang dapat ditingkatkan hingga surat peringatan kedua. Apabila pelanggaran kembali terjadi, sanksi maksimal yang dapat dijatuhkan adalah pengunduran diri. Untuk pelanggaran berat, konsekuensi yang diberikan lebih tegas, mulai dari penghentian kenaikan gaji hingga pengunduran diri, bahkan pada pelanggaran pertama.

Meanwhile, moderate violation is subject to sanctions starting with first warning letter, which can be escalated to second warning letter. In the event of a recurring violation, the maximum sanction to be imposed is resignation. For severe violations, the consequences are stricter, ranging from suspension of salary increase to resignation, even for the first violation.

Setiap sanksi yang dijatuhkan kepada karyawan disesuaikan dengan aturan kepegawaian yang berlaku, sedangkan untuk Dewan Komisaris dan Direksi, mekanisme pemberian sanksi mengacu pada ketentuan Anggaran Dasar Bank serta keputusan RUPS.

Each sanction imposed on employees is in accordance with applicable personnel regulations, while for the Board of Commissioners and Board of Directors, the imposition of sanction mechanism refers to the provisions of the Bank's Articles of Association and the resolutions of GMS.

Laporan Penyimpangan Internal Tahun 2025
Internal Deviation Report in 2025

Penyimpangan (*Internal Fraud*) dalam 1 (Satu) Tahun Internal Fraud in 1 (One) Year	Jumlah Kasus yang Dilakukan oleh Number of Cases Committed by					
	Anggota Dewan Komisaris dan Anggota Direksi Member of Board of Commissioners and Board of Directors		Pegawai Tetap Permanent Employee		Pegawai Tidak Tetap dan Tenaga Kerja Alih Daya Non-Permanent and Outsourced Employees	
	2025	2024	2025	2024	2025	2024
Total *Fraud*	-	-	-	1	2	-
Telah Diselesaikan Settled	-	-	-	1	2	-
Dalam Proses Penyelesaian di Internal Bank Under Internal Settlement Process in the Bank	-	-	-	-	-	-
Belum Diupayakan Penyelesaian Settlement has not been Sought	-	-	-	-	-	-
Telah Ditindaklanjuti Melalui Proses Hukum Followed-Up through Legal Process	-	-	-	-	-	-

Trend Kualitas Penerapan Kode Etik

Trend on Quality of Code of Conduct Implementation

Sepanjang tahun 2025, penerapan Kode Etik di lingkungan Bank terlaksana secara konsisten dan efektif. Seluruh karyawan menunjukkan kepatuhan terhadap ketentuan yang berlaku, sehingga nilai-nilai integritas dan profesionalisme dapat terjaga dalam setiap aktivitas operasional.

Throughout 2025, the Bank's Code of Conduct was implemented consistently and effectively. All employees demonstrated compliance with applicable regulations, ensuring that the values of integrity and professionalism were maintained in all operational activities.

Program Kepemilikan Saham oleh Manajemen dan Karyawan

Management and Employee Stock Ownership Program

Hingga akhir tahun 2025, Bank belum melaksanakan program kepemilikan saham oleh manajemen (MSOP) maupun program kepemilikan saham oleh karyawan (ESOP). Keputusan tersebut didasarkan pada pertimbangan strategis dan kebutuhan Bank, dengan tetap memperhatikan ketentuan peraturan perundang-undangan yang berlaku. Bank senantiasa membuka peluang untuk mengkaji dan mempertimbangkan implementasi program serupa di masa mendatang apabila dinilai relevan dalam mendukung peningkatan kinerja, motivasi, serta komitmen jangka panjang manajemen dan karyawan terhadap pertumbuhan Bank.

Until the end of 2025, the Bank did not conduct management stock ownership program (MSOP) or an employee stock ownership program (ESOP). This decision is based on strategic considerations and the Bank's needs, while still adhering to applicable laws and regulations. The Bank remains open to reviewing and considering the implementation of similar programs in the future if deemed relevant to support improved performance, motivation, and long-term commitment of management and employees to the Bank's growth.

Kebijakan Pengungkapan Informasi

Information Disclosure Policy

Sesuai dengan Peraturan Otoritas Jasa Keuangan No. 4 Tahun 2024 tentang Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka, anggota Dewan Komisaris dan Direksi wajib melaporkan setiap kepemilikan maupun perubahan kepemilikan saham pada perusahaan terbuka kepada Otoritas Jasa Keuangan paling lambat 5 (lima) hari kalender setelah transaksi, serta kepada Perseroan paling lambat 3 (tiga) hari kerja. Di Bank, pelaporan tersebut dilakukan melalui Sekretaris Perusahaan sesuai ketentuan internal guna memastikan kepatuhan regulasi. Sepanjang tahun 2025, laporan kepemilikan saham anggota Dewan Komisaris dan Direksi telah disampaikan kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia melalui sistem *e-reporting*, dengan rincian jumlah kepemilikan dapat dilihat pada Bab Profil Perusahaan.

Pursuant to the Financial Services Authority Regulation No. 4 of 2024 on Reports of Ownership or Any Changes in Ownership of Public Company Shares, members of Board of Commissioners and Board of Directors are required to report any ownership or changes in share ownership in public company to the Financial Services Authority no later than 5 (five) calendar days after the transaction, and to the Company no later than 3 (three) business days. At the Bank, this reporting is conducted through the Corporate Secretary in accordance with internal regulations to ensure regulatory compliance. Throughout 2025, share ownership reports of members of the Board of Commissioners and Board of Directors were submitted to the Financial Services Authority and Indonesia Stock Exchange through e-reporting system, with the ownership details can be seen in the Company Profile Chapter.

Kebijakan Penerapan Strategi Anti-Korupsi dan Anti-*Fraud* [POJK F.1] [G-07] [G-08]

Anti-Corruption and Anti-Fraud Strategy Implementation Policy

Perkembangan globalisasi dan transformasi digital yang semakin pesat membawa peluang sekaligus tantangan bagi industri perbankan, termasuk meningkatnya risiko terjadinya fraud atau kecurangan. Bentuk fraud dapat bervariasi, mulai dari penyalahgunaan kewenangan, manipulasi informasi, hingga penggelapan aset. Dampaknya tidak hanya menimbulkan kerugian finansial, tetapi juga berpotensi merusak reputasi, menurunkan tingkat kepercayaan nasabah dan pemangku kepentingan, serta menimbulkan risiko sanksi dari otoritas pengawas. Sebagai langkah mitigasi, Bank telah menetapkan Kebijakan Penerapan Strategi *Anti-Fraud* melalui Keputusan Direksi No. 007/SK-DIR/10/24 tanggal 16 Oktober 2024.

Penerapan strategi *anti-fraud* memiliki tujuan utama untuk melindungi integritas, kepercayaan, dan keberlanjutan operasional Bank. Adapun tujuan dari penerapan strategi *anti-fraud,* antara lain:

1. Mengurangi kemungkinan terjadinya tindakan *fraud* melalui penerapan kebijakan dan kontrol yang dirancang untuk menutup celah yang bisa dimanfaatkan untuk kecurangan.
2. Meminimalkan kerugian finansial dan operasional yang dapat timbul akibat *fraud*, serta mengurangi biaya terkait pemulihan dan litigasi sebagai upaya perbaikan proses untuk mencegah kejadian serupa di masa depan.
3. Mempertahankan dan meningkatkan kepercayaan nasabah, investor, dan regulator melalui komitmen yang kuat terhadap pencegahan dan penanganan *fraud.*
4. Memastikan kepatuhan terhadap peraturan dan standar yang ditetapkan oleh regulator seperti Otoritas Jasa Keuangan untuk menghindari sanksi hukum.
5. Meningkatkan kesadaran (*awareness*) *anti-fraud* kepada *risk taking unit* sebagai upaya pencegahan, mitigasi, dan meminimalkan *fraud* yang dapat merugikan Bank secara finansial maupun yang dapat memengaruhi kinerja operasional Bank secara keseluruhan.

The rapid development of globalization and digital transformation bring both opportunities and challenges to banking industry, including the increased risk of fraud. Forms of fraud can vary, ranging from abuse of authority, manipulation of information, to embezzlement of assets. The impact not only results in financial losses but also has the potential to damage reputation, reduce customer and stakeholder trust, and pose the risk of sanctions from supervisory authorities. As a mitigation measure, the Bank has established Anti-Fraud Strategy Implementation Policy through the Board of Directors' Decision No. 007/SK-DIR/10/24 dated 16 October 2024.

The implementation of anti-fraud strategies has the main objective of protecting the integrity, trust, and sustainability of the Bank's operations. The objectives of implementing anti-fraud strategies are among others:

1. Reducing the possibility of fraud by implementing policies and controls designed to close loopholes that may be exploited for fraud.
2. Minimizing financial and operational losses that may arise due to fraud, and reducing costs related to recovery and litigation as process improvement efforts to prevent similar incident in the future.
3. Maintaining and increasing the trust of customers, investors, and regulators through a strong commitment to preventing and handling fraud.
4. Ensuring compliance with regulations and standards set by regulators such as the Financial Services Authority to avoid legal sanctions.
5. Raising anti-fraud awareness to risk taking unit as an effort to prevent, mitigate, and minimize fraud that may harm the Bank financially or that may affect the Bank's overall operational performance.

Sosialisasi Kebijakan Penerapan Strategi *Anti-Fraud*

Untuk memperkuat upaya pencegahan *fraud*, Bank menekankan pentingnya partisipasi aktif dari seluruh karyawan. Komitmen ini diwujudkan melalui program sosialisasi *anti-fraud* yang dilakukan secara berkesinambungan dengan memanfaatkan berbagai media internal dan forum pembelajaran. Sepanjang tahun 2025, Bank telah

Dissemination of Anti-Fraud Strategy Implementation Policy

To strengthen fraud prevention efforts, the Bank emphasizes the importance of active participation from all employees. This commitment is realized through an ongoing anti-fraud dissemination program by utilizing various internal media and learning forums. Throughout 2025, the Bank carried out 2 (two) dissemination activities for melaksanakan 2 (dua) kali kegiatan sosialisasi penerapan strategi *anti-fraud* dalam bentuk *training*/pelatihan yang dilakukan secara *offline* (cabang dalam kota) maupun *online* (cabang luar kota dan kantor pusat), sehingga karyawan senantiasa memperoleh pemahaman yang terkini mengenai pencegahan kecurangan serta mampu menerapkannya dalam aktivitas kerja sehari-hari.

anti-fraud strategy implementation in the form of training conducted offline (branches within the city) and online (branches outside the city and the head office), so that employees continuously obtain the latest understanding of fraud prevention and are able to apply it in their daily work activities.

Kebijakan Perlakuan Adil terhadap Pemegang Saham [G-08]

Policy on Fair Treatment of Shareholders

Bank menjunjung tinggi prinsip perlakuan yang setara bagi seluruh Pemegang Saham tanpa membedakan status kepemilikan, baik mayoritas maupun minoritas, domestik maupun asing. Komitmen ini dituangkan dalam Surat Keputusan Direksi No. 013/SK-DIR/07/24 tanggal 29 Juli 2024 perihal Kebijakan *Good Corporate Governance* (GCG), yang disusun sesuai dengan ketentuan Otoritas Jasa Keuangan.

Dalam rangka melindungi kepentingan Pemegang Saham, termasuk Pemegang Saham Minoritas, Bank memastikan pemenuhan hak-hak Pemegang Saham secara adil dan proporsional. Hak Pemegang Saham Minoritas, antara lain meliputi:

1. Memperoleh laporan mengenai kondisi keuangan Bank secara tepat waktu.
2. Memperoleh penyelesaian jika Pemegang Saham tidak setuju terhadap aktivitas dan aksi korporasi Bank.
3. Memberikan suara dalam RUPS.
4. Memperoleh dividen berdasarkan keputusan RUPS sesuai dengan ketentuan peraturan perundang-undangan.

Sebagai wujud penerapan prinsip transparansi, Bank menyampaikan informasi yang relevan dan material kepada Pemegang Saham secara terbuka dan tepat waktu melalui berbagai kanal resmi yang mudah diakses, antara lain situs web Bank, Bursa Efek Indonesia, serta Kustodian Sentral Efek Indonesia. Penyampaian informasi tersebut dilakukan dalam 2 (dua) bahasa, yaitu Bahasa Indonesia dan Bahasa Inggris, guna memastikan akses informasi yang setara bagi seluruh Pemegang Saham.

The Bank upholds the principle of equal treatment for all Shareholders, regardless of ownership status, whether majority or minority, domestic or foreign. This commitment is outlined in the Board of Directors' Decision Letter No. 013/SK-DIR/07/24 dated 29 July 2024 on Good Corporate Governance (GCG) Policy, which was prepared in accordance with the provisions of Financial Services Authority.

To protect the interests of Shareholders, including Minority Shareholders, the Bank ensures that Shareholder rights are fulfilled fairly and proportionally. Minority Shareholder rights, include:

1. Receiving timely reports on the Bank's financial condition.
2. Receiving resolution if Shareholders disagree with the Bank's activities and corporate actions.
3. Voting at the GMS.
4. Receiving dividends based on GMS resolutions in accordance with laws and regulations.

As the manifestation of the principle of transparency, the Bank discloses relevant and material information to Shareholders in an open and timely manner through various easily accessible official channels, including the Bank's website, Indonesia Stock Exchange, and Indonesia Central Securities Depository. This information is provided in 2 (two) languages, Indonesian and English, to ensure equal access to information for all Shareholders.

Kebijakan Pencegahan *Insider Trading* [POJK F.1] [G-08]

Policy to Prevent Insider Trading

Sebagai wujud penerapan GCG, Bank telah menetapkan kebijakan pencegahan *insider trading* yang diatur secara tegas dalam Kode Etik. Kebijakan ini bertujuan untuk memastikan bahwa seluruh kegiatan usaha dilakukan secara transparan, adil, dan sesuai dengan prinsip keterbukaan di pasar modal. Dalam kebijakan tersebut, Dewan Komisaris, Direksi, dan seluruh karyawan Bank dilarang menggunakan informasi material yang belum tersedia untuk umum sebagai dasar pengambilan keputusan investasi, maupun menyebarluaskan rencana strategis dan informasi internal lainnya kepada pihak yang tidak berwenang.

Penerapan kebijakan pencegahan *insider trading* ini selaras dengan ketentuan peraturan pasar modal yang berlaku, sekaligus menjadi upaya Bank dalam menjaga kepercayaan Pemegang Saham, investor, regulator, dan pemangku kepentingan lainnya. Dengan adanya pedoman ini, Bank memastikan bahwa setiap tindakan dan keputusan yang diambil senantiasa berlandaskan prinsip integritas, akuntabilitas, serta kepatuhan terhadap regulasi yang mengikat.

As the manifestation of GCG implementation, the Bank has established a policy to prevent insider trading, expressly stipulated in the Code of Conduct. This policy aims to ensure that all business activities are conducted transparently, fairly, and in accordance with the principles of openness in the capital markets. Under this policy, the Board of Commissioners, Board of Directors, and all Bank employees are prohibited from using material information that is not yet publicly available as a basis for investment decisions, or from disseminating strategic plans and other internal information to unauthorized parties.

The implementation of this insider trading prevention policy is in line with applicable capital market regulations and is also part of the Bank's efforts to maintain the trust of shareholders, investors, regulators, and other stakeholders. With these guidelines, the Bank ensures that every action and decision taken is always based on the principles of integrity, accountability, and compliance with binding regulations.

Whistleblowing System [POJK F.1]

Whistleblowing System

Sebagai bagian dari komitmen memperkuat pengendalian internal dan mencegah terjadinya kecurangan, Bank telah membentuk sistem pelaporan pelanggaran (*whistleblowing system*/WBS). Mekanisme ini memberikan ruang bagi karyawan maupun pihak terkait untuk melaporkan dugaan pelanggaran secara aman dan bertanggung jawab. Kehadiran WBS tidak hanya menjadi sarana deteksi dini terhadap potensi *fraud*, tetapi juga berfungsi sebagai instrumen penting dalam menegakkan prinsip GCG. Dengan penerapan sistem ini, Bank berupaya membangun budaya kerja yang menjunjung tinggi transparansi, integritas, serta akuntabilitas.

As part of its commitment to strengthening internal controls and preventing fraud, the Bank has established whistleblowing system (WBS). This mechanism provides a space for employees and related parties to report suspected violations safely and responsibly. The WBS not only serves as a means of early detection of potential fraud but also serves as a crucial instrument in upholding GCG principles. By implementing this system, the Bank strives to build a work culture that upholds transparency, integrity, and accountability.

Kebijakan *Whistleblowing System*

Kebijakan WBS di Bank diatur melalui Keputusan Direksi No. 008/SK-DIR/11/24 tanggal 20 November 2024 tentang Standar Operasional Prosedur *Whistleblowing System*.

Whistleblowing System Policy

The Bank's WBS policy is regulated by the Board of Directors' Decision No. 008/SK-DIR/11/24 dated 20 November 2024 on the Standard Operating Procedures for Whistleblowing

Dokumen ini menjadi pedoman utama yang mengatur tata kelola sistem, mulai dari struktur pengelolaan, alur pelaporan, hingga mekanisme penanganan dugaan pelanggaran. Kebijakan tersebut juga menegaskan adanya perlindungan hukum bagi pelapor, termasuk jenis perlindungan yang diberikan, serta mengatur proses pemantauan dan evaluasi untuk memastikan efektivitas implementasinya.

Selain itu, standar operasional prosedur WBS menetapkan peran dan tanggung jawab pengelola dalam menjalankan fungsi WBS secara transparan dan akuntabel yang diuraikan sebagai berikut:

1. Melaksanakan program promosi dan sosialisasi secara ekstensif dan intensif supaya pelaksanaan prosedur WBS dapat dipahami dengan benar.
2. Menyelenggarakan tata laksana organisasi sedemikian rupa sehingga laporan pelanggaran yang disampaikan dapat ditangani dengan baik serta terdokumentasi dengan baik, namun kerahasiaan pelapor juga tetap terjamin.
3. Melakukan laporan setiap semester kepada Direksi tentang pelaksanaan program WBS terkait laporan dugaan pelanggaran, meliputi sekurang-kurangnya:
    a. Apakah prosedur WBS dapat diterapkan dengan baik dan mendapatkan sambutan yang positif dari karyawan ataupun para pemangku kepentingan lainnya?
    b. Apakah prosedur WBS cukup efektif dalam melakukan deteksi dini dan pencegahan penyimpangan ataupun pelanggaran?
    c. Apakah terdapat suatu pola pelanggaran tertentu yang sering berulang? Apakah kira-kira penyebabnya?
    d. Saran perbaikan untuk meningkatkan efektivitas penerapan WBS dalam mencapai sasaran penciptaan iklim kerja yang terbuka, tulus, dan bertanggung jawab.

Sosialisasi Kebijakan *Whistleblowing System*

Sosialisasi Internal

1. Tim Pengelola WBS secara rutin mengadakan pelatihan untuk meningkatkan kesadaran karyawan terkait WBS.
2. Pengiriman *e-mail* bulanan kepada karyawan untuk memberikan edukasi dan pengingat tentang kebijakan WBS.

Sosialisasi Eksternal

1. Informasi mengenai kebijakan WBS disampaikan melalui situs web Bank.
2. Penyebaran materi WBS melalui buletin internal dan poster yang dipasang di area kerja.
3. Kegiatan sosialisasi etika yang dilakukan kepada pihak eksternal terkait.

System. This document serves as the primary guideline governing system governance, from management structure and reporting flow to mechanisms for handling alleged violations. The policy also emphasizes legal protection for whistleblowers, including the types of protection provided, and regulates monitoring and evaluation process to ensure effective implementation.

Furthermore, standard operating procedures for WBS define the managers' roles and responsibilities in performing WBS function in a transparent and accountable manner, as outlined below:

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

Internal Dissemination

1. The WBS Management Team regularly holds training to increase employee awareness regarding WBS.
2. Sending monthly e-mails to employees to provide education and reminders about WBS policy.

External Dissemination

1. Information on WBS policy is presented through the Bank's website.
2. Dissemination of WBS materials through internal bulletins and posters installed in working areas.
3. Activities of ethics dissemination carried out to related external parties.

Jenis Pelanggaran yang Dapat Dilaporkan

Melalui kebijakan WBS, Bank memberikan saluran pelaporan khusus untuk berbagai bentuk dugaan pelanggaran yang terkait langsung dengan kegiatan maupun kepentingan Bank. Laporan yang disampaikan dibatasi pada tindakan yang terjadi di lingkungan Bank atau melibatkan pihak yang berhubungan dengan Bank. Adapun kategori pelanggaran yang dapat dilaporkan meliputi:

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 mencederai citra Bank.
6. Pelanggaran aturan internal yang dapat menciderai integritas pelaporan perusahaan, baik di bidang keuangan ataupun bidang lainnya.
7. Perbuatan yang membahayakan keselamatan dan kesehatan kerja.

Types of Violation that Can Be Reported

Through WBS policy, the Bank provides a dedicated reporting channel for various forms of alleged violations directly related to the Bank's activities or interests. Reports are limited to actions occurring within the Bank or involving parties related to the Bank. The categories of violations that can be reported include:

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.
7. Acts that endanger occupational safety and health.

Cara Penyampaian Laporan Pelanggaran dan Pihak yang Mengelola Pelanggaran

Bank Victoria menyediakan mekanisme WBS yang memberi keleluasaan bagi pelapor dalam menyampaikan dugaan pelanggaran melalui berbagai kanal komunikasi. Laporan dapat disampaikan baik secara tertulis maupun lisan, menggunakan media seperti surat, email, telepon, atau pesan singkat, yang seluruhnya dikelola oleh Departemen *Anti-Fraud* melalui prosedur berikut:

1. Melalui Surat
   Laporan dapat ditujukan kepada Direktur Kepatuhan dan Manajemen Risiko dan ditembuskan kepada Departemen *Anti-Fraud* di alamat Graha BIP Lt. 10, Jl. Gatot Subroto Kav. 23, Karet Semanggi, Setiabudi, Jakarta Selatan, DKI Jakarta 12930.
2. Melalui Email
   a. Departemen Anti-*Fraud,* jika terlapor adalah karyawan, dapat dihubungi melalui email: unitantifraud@victoriabank.co.id.

Mechanism to Submit Whistleblowing Report and Party Managing the Violations

Bank Victoria provides WBS mechanism that allows whistleblowers to freely submit alleged violations through various communication channels. Reports can be submitted either in writing or verbally, using media such as letters, email, telephone, or text messages, all of which are managed by the Anti-Fraud Department through the following procedures:

1. By Mail
   Reports can be addressed to the Director of Compliance and Risk Management with a copy to the Anti-Fraud Department at Gedung Graha BIP Lt. 10 Jl. Gatot Subroto Kav. 23, Kel. Karet Semanggi, Kec. Setiabudi, Jakarta Selatan 12930.
2. By E-mail
   a. Anti-Fraud Department, if the reported party is an employee, can be contacted via e-mail: unitantifraud@victoriabank.co.id.

b. Direktur Kepatuhan dan Manajemen Risiko, jika terlapor adalah anggota Dewan Komisaris, dapat dihubungi melalui email: unitantifrauddireksi@victoriabank.co.id.
c. Dewan Komisaris, jika terlapor adalah anggota Direksi, dapat dihubungi melalui email: unitantifraudkomisaris@victoriabank.co.id.

3. Melalui Telepon atau SMS
   Laporan dapat disampaikan melalui nomor telepon atau SMS ke: 0811 9615 009.

Perlindungan bagi Pelapor

Dalam rangka memastikan efektivitas proses penanganan laporan, Bank mendorong pelapor untuk menyertakan identitas diri agar Tim *Anti-Fraud* dapat melakukan klarifikasi dan investigasi secara lebih optimal. Bank menjamin kerahasiaan identitas pelapor yang dijaga sepenuhnya oleh Tim *Anti-Fraud* serta dilindungi oleh komitmen Dewan Komisaris dan Direksi. Informasi dasar yang diharapkan mencakup alamat surat atau email, nomor telepon, maupun nomor telepon seluler. Apabila pelapor menghadapi potensi ancaman sebagai akibat dari laporan yang disampaikan, Bank memiliki kewajiban untuk memberikan perlindungan sebagai berikut:

1. Perlindungan fisik bagi pelapor dan keluarganya.
2. Perlindungan atas harta benda pelapor dan keluarganya terhadap ancaman, teror, atau tindakan balas dendam.
3. Perlindungan administratif, termasuk pencegahan terhadap penundaan kenaikan pangkat, pemecatan, pengucilan di tempat kerja, mutasi yang tidak adil, serta jaminan keamanan kerja.
4. Perlindungan hukum dalam proses litigasi di Pengadilan Negeri, termasuk biaya hukum yang ditanggung, dan jika diperlukan, perlindungan tambahan melalui Lembaga Perlindungan Saksi dan Korban.

Penanganan Pengaduan

Setiap pengaduan yang diterima Bank, baik berupa keluhan, laporan, maupun informasi terkait dugaan tindakan yang berpotensi menimbulkan *fraud*, ditindaklanjuti melalui mekanisme berikut:

1. Jika laporan yang diterima terindikasi pelanggaran *fraud*, maka Departemen *Anti-Fraud* akan melakukan investigasi untuk memastikan kebenaran laporan tersebut.
2. Jika laporan yang diterima termasuk dalam kategori pelanggaran *non-fraud*, maka Departemen *Anti-Fraud* akan menginisiasi tindak lanjut dengan mengoordinasikan laporan tersebut kepada unit kerja terkait untuk penanganan lebih lanjut.

b. Director of Compliance and Risk Management, if the reported party is member of the Board of Commissioners, can be contacted via e-mail: unitantifrauddireksi@victoriabank.co.id.
c. The Board of Commissioners, if the reported party is member of the Board of Directors, can be contacted via email: unitantifraudkomisaris@victoriabank.co.id.

3. By Telephone or SMS
   Reports can be submitted via telephone number or SMS to: 0811 9615 009.

Protection for Whistleblower

To ensure the effectiveness of the report handling process, the Bank encourages whistleblowers to include personal identification so that the Anti-Fraud Team can conduct clarification and investigations more effectively. The Bank guarantees the confidentiality of whistleblower's identity, which is fully maintained by the Anti-Fraud Team and protected by the commitment of the Board of Commissioners and Board of Directors. Basic information required includes a mailing or email address, telephone number, and mobile phone number. In the event the whistleblower faces potential threats as a result of the report, the Bank shall provide the following protection:

1. Physical protection for the whistleblower and the family members.
2. Protection for the whistleblower's and family member's properties against threat, terror, or acts of revenge.
3. Administrative protection, including prevention of suspension in promotion, dismissal, expulsion at work, unfair transfer, and position security assurance.
4. Legal protection in the litigation process in the District Court, including legal costs borne, and if necessary, additional protection through Witness and Victim Protection Agency.

Complaint Handling

Every complaint received by the Bank, whether in the form of a complaint, report, or information regarding alleged actions that could potentially lead to fraud, will be followed up through the following mechanisms:

1. If the report received indicates fraud violation, the Anti-Fraud Department will conduct an investigation to ensure the truth of the report.
2. If the report received is included in category of non-fraud violation, the Anti-Fraud Department will initiate follow-up by coordinating the report to relevant work unit for further handling.

Laporan Pelanggaran Tahun 2025 dan Tindak Lanjutnya

Sepanjang tahun 2025, Bank menerima 2 (dua) laporan pelanggaran melalui WBS. Seluruh laporan tersebut telah ditindaklanjuti dan diselesaikan.

Whistleblowing Report in 2025 and Its Follow-Up

Throughout 2025, the Bank received. 2 (two) reports of violations through WBS. All of these reports were followed up and settled.

Akses Informasi dan Data Perusahaan

Access to Company's Information and Data

Bank menyediakan akses informasi dan data perusahaan bagi seluruh pemangku kepentingan melalui berbagai saluran resmi. Informasi keuangan maupun non-keuangan, termasuk laporan wajib, produk dan fasilitas, peluang karier, hingga materi tata kelola dapat diakses melalui situs web resmi Bank di www.victoriabank.co.id. Selain itu, Bank juga membuka jalur komunikasi melalui *call center* di nomor 1500977, email costumercare@victoriabank.co.id, serta media sosial resmi seperti Facebook (@BankVictoriaID), Youtube (Bank Victoria), dan Instagram (@bankvictoria).

Sebagai wujud transparansi, Bank secara rutin mempublikasikan informasi melalui siaran pers dan buletin internal. Pada tahun 2025, Bank telah menerbitkan 21 (dua puluh satu) konten buletin bertajuk Victoria News. Informasi tersebut juga diperkuat dengan media elektronik, termasuk distribusi melalui email corporate secretary di corsec@victoriabank.co.id.

Untuk memudahkan akses, pemangku kepentingan dapat mendaftarkan identitas serta alamat email ke dalam *mailing list* yang disediakan Bank. Dengan demikian, pemangku kepentingan dapat menerima informasi terkini secara berkala dan transparan.

The Bank provides access to company information and data for all stakeholders through various official channels. Financial and non-financial information, including mandatory reports, products and facilities, career opportunities, and governance materials, is accessible through the Bank's official website at www.victoriabank.co.id. Furthermore, the Bank also provides communication channels through its call center at 1500977, email customercare@victoriabank.co.id, and official social media platforms such as Facebook (@BankVictoriaID), YouTube (Bank Victoria), and Instagram (@bankvictoria).

As a form of transparency, the Bank regularly publishes information through press releases and internal bulletins.In 2025, the Bank published 21 (twenty-one) bulletins titled Victoria News. This information is also reinforced through electronic media, including distribution through email to the corporate secretary at corsec@victoriabank.co.id.

For easier access, stakeholders can register their identities and email addresses on the Bank's mailing list. As such, stakeholders can receive the latest information regularly and transparently.

Implementasi Tata Kelola Perusahaan Terbuka
Implementation of Corporate Governance of Public Company

Sepanjang tahun 2025, Bank telah mengimplementasikan prinsip-prinsip GCG dengan berpedoman pada Pedoman Tata Kelola Perusahaan Terbuka sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No. 21/POJK.04/2015 serta Surat Edaran Otoritas Jasa Keuangan No. 32/SEOJK.04/2015. Penerapan pedoman tersebut diuraikan sebagai berikut:

Throughout 2025, the Bank implemented GCG principles in accordance with the Guidelines for Public Company Governance as stipulated in Financial Services Authority Regulation No. 21/POJK.04/2015 and Financial Services Authority Circular No. 32/SEOJK.04/2015. The implementation of these guidelines is outlined as follows:

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:	Penerapan: Implementation:	Status:
Perusahaan terbuka memiliki cara atau prosedur teknis pengumpulan suara (voting), baik secara terbuka maupun tertutup yang mengedepankan independensi, dan kepentingan Pemegang Saham.	Pada RUPS Tahunan 2025, Bank melaksanakan pengambilan keputusan melalui musyawarah untuk mufakat sesuai Peraturan Otoritas Jasa Keuangan No. 15 Tahun 2020. Apabila mufakat tidak tercapai, keputusan diambil melalui pemungutan suara secara terbuka, baik secara langsung maupun melalui eASY.KSEI. Seluruh ketentuan diatur dalam Anggaran Dasar dan tata tertib RUPS yang dibagikan kepada Pemegang Saham serta tersedia di situs web Bank.	Terpenuhi
The public company has technical voting methods or procedures, either open or close, prioritizing independence, and interest of Shareholders.	At the 2025 Annual GMS, the Bank adopted resolutions through deliberation to reach consensus in accordance with Financial Services Authority Regulation No. 15 of 2020. In the event consensus is not reached, resolutions are made through open voting, either in person or through eASY.KSEI. All provisions are stipulated in the Articles of Association and GMS rules of procedure distributed to Shareholders and available on the Bank's website.	Complied
Rekomendasi 2: Recommendation 2:	**Penerapan:** Implementation:	**Status:**
Seluruh anggota Direksi dan anggota Dewan Komisaris perusahaan terbuka hadir dalam RUPS Tahunan.	Dalam RUPS Tahunan 2025, seluruh anggota Direksi dan Dewan Komisaris hadir.	Terpenuhi
All members of Board of Directors and members of Board of Commissioners of the public company attend the Annual GMS.	In the 2025 Annual GMS, all members of the Board of Directors and Board of Commissioners were present.	Complied
Rekomendasi 3: Recommendation 3:	**Penerapan:** Implementation:	**Status:**
Ringkasan risalah RUPS tersedia dalam situs web perusahaan terbuka paling sedikit selama 1 (satu) tahun.	Ringkasan Risalah RUPS Tahunan 2025 dalam Bahasa Indonesia dan Inggris diumumkan paling lambat 2 (dua) hari kerja setelah pelaksanaan RUPS melalui situs web Bank, sistem pelaporan elektronik Bursa Efek Indonesia, Otoritas Jasa Keuangan, serta eASY.KSEI. Informasi terkait pelaksanaan RUPS, termasuk Ringkasan Risalah RUPS 5 (lima) tahun terakhir juga tersedia pada situs web Bank.	Terpenuhi
Summary of GMS minutes is available on the public company's website for at least 1 (one) year.	The Summary of Minutes of the 2025 Annual GMS in Indonesian and English are announced no later than 2 (two) working days following GMS implementation via the Bank's website, electronic reporting system of Indonesia Stock Exchange, Financial Services Authority, and eASY.KSEI. Information on GMS implementation, including the Summary of Minutes of GMS for the past 5 (five) years, is also available on the Bank's website.	Complied

Rekomendasi 4: Recommendation 4:	Penerapan: Implementation:	Status:
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.**		
Perusahaan terbuka memiliki suatu kebijakan komunikasi dengan Pemegang Saham atau investor.	Sebagai wujud keterbukaan informasi, Bank menetapkan kebijakan komunikasi dengan Pemegang Saham yang berpedoman pada Anggaran Dasar. Seluruh informasi penting mengenai kegiatan dan kinerja Bank disampaikan secara transparan serta dapat diakses publik melalui situs web resmi Bank.	Terpenuhi
The public company has communication policy with the Shareholders or investors.	As the manifestation of information transparency, the Bank has established a communication policy with Shareholders guided by the Articles of Association. All important information regarding the Bank's activities and performance is presented transparently and is publicly accessible through the Bank's official website.	Complied
Rekomendasi 5: **Recommendation 5:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka mengungkapkan kebijakan komunikasi perusahaan terbuka dengan Pemegang Saham atau investor dalam situs web.	Bank menjalankan kebijakan komunikasi dengan Pemegang Saham dan investor secara terbuka, dengan memastikan seluruh ketentuan dan mekanisme komunikasi tersebut dipublikasikan melalui situs web resmi Bank.	Terpenuhi
The public company discloses its policy on communication with Shareholders or investors on the website.	The Bank carries out an open communication policy with Shareholders and investors, ensuring that all provisions and communication mechanisms are published on the Bank's official website.	Complied
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:**	**Penerapan:** **Implementation:**	**Status:**
Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi perusahaan terbuka.	Bank telah memenuhi ketentuan Pasal 20 Peraturan Otoritas Jasa Keuangan No. 33/POJK.04/2014 dan Pasal 35 ayat 1 Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 mengenai susunan Dewan Komisaris. Per 31 Desember 2025, Dewan Komisaris Bank berjumlah 3 (tiga) orang, terdiri atas 2 (dua) Komisaris Independen dan 1 (satu) Komisaris Non-Independen.	Terpenuhi
The determination of number of Board of Commissioners' members considers the public company's condition.	The Bank has complied with the provisions of Article 20 of Financial Services Authority Regulation No. 33/POJK.04/2014 and Article 35 paragraph 1 of Financial Services Authority Regulation No. 17 of 2023 on the composition of the Board of Commissioners. As of 31 December 2025, the Bank's Board of Commissioners comprised 3 (three) members, consisting of 2 (two) Independent Commissioners and 1 (one) Non-Independent Commissioner.	Complied
Rekomendasi 7: **Recommendation 7:**	**Penerapan:** **Implementation:**	**Status:**
Penentuan komposisi anggota Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.	Komposisi anggota Dewan Komisaris telah memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.	Terpenuhi
The determination of Board of Commissioners' composition considers the range of expertise, knowledge, and experience required.	The composition of the Board of Commissioners has considered the diversity of skills, knowledge, and experience required.	Complied
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:**	**Penerapan:** **Implementation:**	**Status:**
Dewan Komisaris mempunyai kebijakan penilaian sendiri *(self-assessment)* untuk menilai kinerja Dewan Komisaris.	Bank menetapkan mekanisme penilaian kinerja Dewan Komisaris melalui *BOC Charter* sebagai pedoman utama. Proses penilaian beserta hasilnya disampaikan secara transparan dalam Laporan Tahunan ini sebagai bentuk akuntabilitas pelaksanaan tugas pengawasan.	Terpenuhi
The Board of Commissioners has self-assessment policy to assess the Board of Commissioners' performance.	The Bank has established performance assessment mechanism for the Board of Commissioners through BOC Charter as its primary guideline. The assessment process and its results are transparently presented in this Annual Report as a form of accountability for the implementation of supervisory duties.	Complied

Rekomendasi 9: Recommendation 9:	Penerapan: Implementation:	Status:
Kebijakan penilaian sendiri *(self-assessment)* 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.	Penilaian kinerja Dewan Komisaris dilaksanakan berdasarkan kebijakan yang tertuang dalam *BOC Charter*. Hasil penilaian tersebut dipublikasikan dalam Laporan Tahunan ini sebagai bentuk transparansi dan pertanggungjawaban Bank. The performance assessment of the Board of Commissioners is carried out based on the policies outlined in BOC Charter. The results of such assessments are published in this Annual Report as a form of transparency and accountability for the Bank.	Terpenuhi Complied
Rekomendasi 10: **Recommendation 10:**	**Penerapan:** **Implementation:**	**Status:**
Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan. The Board of Commissioners has policy related to resignation of the Board of Commissioners' members if involved in financial crime.	Dewan Komisaris berpedoman pada *BOC Charter* yang memuat ketentuan terkait mekanisme pemberhentian apabila terdapat anggota yang terbukti melakukan pelanggaran atau tindak kejahatan di bidang keuangan. The Board of Commissioners is guided by BOC Charter which contains provisions on dismissal mechanism for members found guilty of violations or crimes in financial sector.	Terpenuhi Complied
Rekomendasi 11: **Recommendation 11:**	**Penerapan:** **Implementation:**	**Status:**
Dewan Komisaris atau Komite yang menjalankan fungsi nominasi dan remunerasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi. 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.	Komite Remunerasi dan Nominasi menerapkan kebijakan khusus terkait proses nominasi anggota Direksi, yang disusun secara terstruktur dalam Kebijakan Sistem Nominasi dan Remunerasi sebagai pedoman pelaksanaannya. The Remuneration and Nomination Committee implements a specific policy on the nomination process for members of the Board of Directors, structured in the Nomination and Remuneration System Policy as a guideline for its implementation.	Terpenuhi Complied

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:	Penerapan: Implementation:	Status:
Penentuan jumlah anggota Direksi mempertimbangkan kondisi perusahaan terbuka, serta efektivitas dalam pengambilan keputusan. The determination of number of Board of Directors' members considers the public company's condition and effectiveness in decision-making.	Bank telah memenuhi ketentuan Pasal 20 Peraturan Otoritas Jasa Keuangan No. 33/POJK.04/2014 dan Pasal 6 ayat 1 Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 terkait jumlah Direksi. Per 31 Desember 2025, Direksi Bank berjumlah 5 (lima) orang, dengan penetapan yang disesuaikan dengan kompleksitas dan kebutuhan Bank. The Bank has complied with the provisions of Article 20 of Financial Services Authority Regulation No. 33/POJK.04/2014 and Article 6 paragraph 1 of Financial Services Authority Regulation No. 17 of 2023 on the number of the Board of Directors. As of 31 December 2025, the Bank's Board of Directors consisted of 5 (five) members, with the appointment adjusted to the Bank's complexity and needs.	Terpenuhi Complied
Rekomendasi 13: **Recommendation 13:**	**Penerapan:** **Implementation:**	**Status:**
Penentuan komposisi anggota Direksi memperhatikan, keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan. The determination of Board of Directors' composition considers the range of expertise, knowledge, and experience required.	Komposisi Direksi ditetapkan dengan mempertimbangkan kebutuhan dan kompleksitas usaha Bank, serta memperhatikan keberagaman keahlian, pendidikan, pengalaman, dan gender. Keberagaman ini diharapkan mendukung pengambilan keputusan yang lebih optimal dalam menghadapi tantangan yang kompleks. The composition of the Board of Directors is determined by considering the needs and complexity of the Bank's business, and by paying attention to the diversity of expertise, education, experience, and gender. This diversity is expected to support more optimal decision-making in facing complex challenges.	Terpenuhi Complied
Rekomendasi 14: **Recommendation 14:**	**Penerapan:** **Implementation:**	**Status:**
Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi. The Board of Directors' member in charge of accounting or finance has the expertise and/or knowledge in accounting.	Direksi yang menangani bidang akuntansi dan keuangan memiliki latar belakang dan pengalaman profesional yang memadai di sektor keuangan dan akuntansi, sehingga mampu mendukung pengelolaan keuangan Bank secara efektif. The Board of Directors responsible for accounting and finance have adequate professional backgrounds and experience in finance and accounting sectors, thus enabling them to effectively support the Bank's financial management.	Terpenuhi Complied

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:**	**Penerapan:** **Implementation:**	**Status:**
Direksi mempunyai kebijakan penilaian sendiri *(self-assessment)* untuk menilai kinerja Direksi.	Bank melaksanakan penilaian kinerja Direksi berdasarkan ketentuan yang tercantum dalam *BOD Charter*. Hasil penilaian tersebut disampaikan secara transparan dalam Laporan Tahunan ini sebagai bentuk akuntabilitas terhadap pelaksanaan tugas dan tanggung jawab Direksi.	Terpenuhi
The Board of Directors has self-assessment policy to assess the Board of Directors' performance.	The Bank conducts performance assessments of the Board of Directors based on the provisions stated in BOD Charter. The results of these assessments are transparently presented in this Annual Report as a form of accountability for the implementation of the Board of Directors' duties and responsibilities.	Complied
Rekomendasi 16: **Recommendation 16:**	**Penerapan:** **Implementation:**	**Status:**
Kebijakan penilaian sendiri *(self-assessment)* untuk menilai kinerja Direksi diungkapkan melalui laporan tahunan perusahaan terbuka.	Penilaian kinerja Direksi dilakukan sesuai dengan pedoman yang tertuang dalam *BOD Charter*. Hasil evaluasi ini dipublikasikan dalam Laporan Tahunan sebagai bentuk transparansi dan pertanggungjawaban Bank atas kinerja Direksi.	Terpenuhi
The self-assessment policy to assess the Board of Directors' performance is disclosed in the public company's Annual Report.	The performance assessments of the Board of Directors are conducted in accordance with the guidelines stated in BOD Charter. This evaluation results are published in the Annual Report as a form of transparency and accountability of the Bank for the performance of the Board of Directors.	Complied
Rekomendasi 17: **Recommendation 17:**	**Penerapan:** **Implementation:**	**Status:**
Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan.	Direksi menerapkan ketentuan *BOD Charter* yang memuat mekanisme pemberhentian anggota apabila terbukti melakukan pelanggaran atau keterlibatan dalam tindak kejahatan di bidang keuangan.	Terpenuhi
The Board of Directors has policy related to resignation of the Board of Directors' members if involved in financial crime.	The Board of Directors implements the provisions of BOD Charter, which outlines a mechanism for dismissing members if proven to have committed violations or been involved in financial crimes.	Complied

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:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan untuk mencegah terjadinya *insider trading*.	Bank menetapkan kebijakan pencegahan *insider trading* sebagai bagian dari Kode Etik, guna memastikan seluruh aktivitas transaksi saham dan informasi internal dilakukan secara etis dan sesuai peraturan yang berlaku.	Terpenuhi
The public company has a policy to prevent the occurrence of insider trading.	The Bank has established insider trading prevention policy as part of its Code of Conduct, to ensure that all stock transactions and internal information are conducted ethically and in accordance with applicable regulations.	Complied
Rekomendasi 19: **Recommendation 19:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan anti-korupsi dan *anti-fraud.*	Bank melaksanakan program dan prosedur pencegahan korupsi serta *fraud* berdasarkan Keputusan Direksi No. 007/SK-DIR/10/24 tentang Kebijakan Penerapan Strategi *Anti-Fraud* dan No. 008/SK-DIR/10/24 tanggal 16 Oktober 2024 tentang Standar Operasional Prosedur Penerapan Strategi *Anti-Fraud*. Ketentuan ini juga tercantum dalam Kode Etik sebagai pedoman etika dan kepatuhan bagi seluruh pegawai.	Terpenuhi
The public company has anti-corruption and anti-fraud policy.	The Bank implements corruption and fraud prevention programs and procedures based on the Board of Directors' Decision No. 007/SK-DIR/10/24 on Anti-Fraud Strategy Implementation Policy and No. 008/SK-DIR/10/24 dated 16 October 2024 on Standard Operating Procedures for Implementing Anti-Fraud Strategies. These provisions are also stated in the Code of Conduct as ethical and compliance guidelines for all employees.	Complied
Rekomendasi 20: **Recommendation 20:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor.	Bank menerapkan kebijakan seleksi dan pengembangan kemampuan pemasok atau vendor melalui Surat Keputusan Direktur No. 027/SK-DIR/06/23 tanggal 27 Juni 2023 tentang Kebijakan Pengadaan Inventaris/Barang Lainnya dan Jasa.	Terpenuhi
The public company has a policy on selection and improvement of supplier's or vendor's capabilities.	The Bank implements supplier or vendor selection and development policy through the Board of Directors' Decision Letter No. 027/SK-DIR/06/23 dated 27 June 2023 on Procurement Policy for Inventory/Other Goods and Services.	Complied

Rekomendasi 21: Recommendation 21:	Penerapan: Implementation:	Status:
Perusahaan terbuka memiliki kebijakan tentang pemenuhan hak-hak kreditur.	Bank menetapkan kebijakan pemenuhan hak-hak kreditur sebagai bagian dari Kode Etik, guna memastikan perlindungan dan penghormatan terhadap hak kreditur dalam seluruh kegiatan operasional Bank.	Terpenuhi
The public company has a policy on the fulfillment of creditor's rights.	The Bank has established creditor rights fulfillment policy as part of its Code of Conduct, to ensure the protection and respect of creditor rights in all Bank operations.	Complied
Rekomendasi 22: **Recommendation 22:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan sistem WBS.	Bank menerapkan dan memutakhirkan sistem WBS melalui Keputusan Direksi No. 007/SK-DIR/10/24 tentang Kebijakan Penerapan Strategi *Anti-Fraud* dan No. 008/SK-DIR/10/24 tanggal 16 Oktober 2024 tentang Standar Operasional Prosedur Penerapan Strategi *Anti-Fraud*, untuk memastikan pelaporan pelanggaran dilakukan secara efektif dan terpercaya.	Terpenuhi
The public company has a policy on WBS system.	The Bank has implemented and updated its WBS system through the Board of Directors' Decision No. 007/SK-DIR/10/24 on Anti-Fraud Strategy Implementation Policy and No. 008/SK-DIR/10/24 dated 16 October 2024 on Standard Operating Procedures for Implementing Anti-Fraud Strategy, to ensure an effective and reliable reporting of violations.	Complied
Rekomendasi 23: **Recommendation 23:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan.	Bank melaksanakan program insentif jangka panjang untuk Direksi dan karyawan sesuai dengan Keputusan Direksi No. 001A/SK-DIR/12/22 tanggal 1 Desember 2022 tentang Kebijakan dan Prosedur *Human Capital Management*. Pemberian insentif ini dicatat dalam Laporan Keuangan pada pos Liabilitas Imbalan Kerja dan dijabarkan dalam Laporan Tahunan sebagai bagian dari transparansi pelaporan.	Terpenuhi
The public company has a policy on provision of longterm incentive for the Board of Directors and employees.	The Bank implements a long-term incentive program for Board of Directors and employees in accordance with the Board of Directors' Decision No. 001A/SK-DIR/12/22 dated 1 December 2022 on Human Capital Management Policies and Procedures. This incentive program is recorded in the Financial Statements under Employee Benefits Liabilities and detailed in the Annual Report as part of reporting transparency.	Complied

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:	Penerapan: Implementation:	Status:
Perusahaan terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs web sebagai media keterbukaan informasi.	Bank telah mengelola situs web perusahaan seoptimal mungkin untuk selalu menyediakan informasi yang terbaru dan akurat untuk Publik. Selain situs web, Bank juga memanfaatkan teknologi dan aplikasi media sosial lainnya seperti *mobile banking*, *internet banking*, Instagram, Facebook, dan Youtube untuk media keterbukaan informasi.	Terpenuhi
The public company utilizes information technology more broadly, in addition to the website, as a media for information disclosure.	The Bank has optimally managed its corporate website to consistently provide the most up-to-date and accurate information to the public. In addition to website, the Bank also utilizes technology and other social media applications, such as mobile banking, internet banking, Instagram, Facebook, and YouTube, for information transparency.	Complied
Rekomendasi 25: **Recommendation 25:**	**Penerapan:** **Implementation:**	**Status:**
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.	Laporan Tahunan Bank menyajikan informasi mengenai pemilik manfaat akhir atas kepemilikan saham, serta identitas Pemegang Saham Utama dan Pengendali, yang disampaikan secara transparan dalam bab Profil Perusahaan.	Terpenuhi
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.	The Bank's Annual Report presents information on the ultimate beneficial owners of share ownership, as well as identities of Main and Controlling Shareholders, transparently disclosed in the Company Profile chapter.	Complied

Pedoman Umum Governansi Korporat Indonesia
General Guidelines for Indonesian Corporate Governance

Sebagai acuan dalam memperkuat praktik tata kelola yang selaras dengan standar internasional, Komite Nasional Kebijakan Governansi (KNKG) menerbitkan Pedoman Umum Governansi Korporat Indonesia (PUGKI) 2021. Pedoman ini ditujukan khususnya bagi perusahaan yang tercatat di pasar modal serta entitas yang mengelola dana masyarakat, termasuk Bank. Dalam penerapannya, Bank mengadopsi prinsip dan rekomendasi yang tertuang dalam PUGKI 2021 dengan menggunakan pendekatan "terpenuhi atau penjelasan". Melalui pendekatan ini, Bank memastikan penerapan prinsip governansi dilakukan secara transparan, dengan uraian implementasi sebagai berikut:

As a reference for strengthening corporate governance practices in line with international standards, the National Committee for Governance Policy (KNKG) issued the 2021 General Guidelines for Indonesian Corporate Governance (PUGKI). These guidelines are intended specifically for companies listed on capital market and entities managing public funds, including the Bank. In its implementation, the Bank adopts the principles and recommendations outlined in the 2021 PUGKI by using a "complied or explanation" approach. Through this approach, the Bank ensures a transparent implementation of governance principles, with the following implementation details:

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:**	**Keterangan:** **Description:**	**Status:**
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. 4. Berkemampuan dalam bertahan dan bertumbuh (*corporate resilience*).	Direksi melaksanakan tugas dan tanggung jawabnya dengan menekankan pencapaian kinerja jangka panjang, penerapan prinsip etika bisnis, tanggung jawab sosial dan lingkungan, serta upaya berkelanjutan dalam meningkatkan efektivitas dan pertumbuhan Bank.	Terpenuhi
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. 4. Be able to survive and grow (corporate resilience).	The Board of Directors performs its duties and responsibilities by emphasizing long-term performance achievement, application of ethical business principles, social and environmental responsibility, and ongoing efforts to improve the Bank's effectiveness and growth.	Complied
Rekomendasi 1.1.2: **Recommendation 1.1.2:**	**Keterangan:** **Description:**	**Status:**
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.	Direksi menekankan penguatan infrastruktur teknologi serta pengembangan inovasi digital sebagai upaya strategis untuk mendukung pencapaian visi, misi, dan target operasional Bank baik dalam jangka pendek maupun jangka panjang.	Terpenuhi
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.	The Board of Directors emphasizes strengthening technology infrastructure and developing digital innovation as strategic efforts to support the achievement of the Bank's vision, mission, and operational targets in both the short and long term.	Complied
Rekomendasi 1.1.3: **Recommendation 1.1.3:**	**Keterangan:** **Description:**	**Status:**
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.	Direksi mengelola manajemen risiko dan SPI secara efektif dan proaktif, sesuai dengan peraturan perundang-undangan dan standar yang berlaku, guna mendorong pencapaian kinerja berkelanjutan serta memperkuat daya saing Bank.	Terpenuhi
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.	The Board of Directors manages risk management and SPI effectively and proactively, in accordance with applicable laws and standards, to encourage sustainable performance and strengthen the Bank's competitiveness.	Complied

Rekomendasi 1.1.4: Recommendation 1.1.4:	Keterangan: Description:	Status:
Direksi memastikan integritas akuntansi dan sistem pelaporan keuangan korporasi dan pengungkapan yang tepat waktu dan akurat atas semua informasi material mengenai korporasi.	Direksi menjamin keandalan akuntansi dan sistem pelaporan keuangan Bank, serta memastikan pengungkapan informasi material dilakukan tepat waktu dan akurat. Upaya ini merupakan bagian dari penerapan manajemen risiko untuk menjaga transparansi serta membangun kepercayaan pemangku kepentingan.	Terpenuhi
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.	The Board of Directors guarantees the reliability of the Bank's accounting and financial reporting systems, as well as ensures a timely and accurate disclosure of material information. These efforts are part of risk management implementation to maintain transparency and build stakeholder trust.	Complied
Rekomendasi 1.1.5: **Recommendation 1.1.5:**	**Keterangan:** **Description:**	**Status:**
Direksi memastikan pelaporan keberlanjutan telah disusun sebagaimana mestinya.	Direksi menerapkan prinsip-prinsip keberlanjutan dalam seluruh kegiatan Bank dan memastikan penyusunan Laporan Keberlanjutan dilakukan sesuai dengan peraturan perundang-undangan serta standar yang berlaku.	Terpenuhi
The Board of Directors ensures that sustainability reporting has been prepared properly.	The Board of Directors applies sustainability principles in all Bank activities and ensures that the Sustainability Report is prepared in accordance with applicable laws and regulations and standards.	Complied
Rekomendasi 1.1.6: **Recommendation 1.1.6:**	**Keterangan:** **Description:**	**Status:**
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.	Direksi secara konsisten mengembangkan dan memutakhirkan kerangka tata kelola TI Bank untuk mendukung kebutuhan dan prioritas bisnis. Implementasi governansi TI mencakup penyelarasan rencana strategis TI dengan strategi bisnis, pemanfaatan dan optimalisasi sumber daya TI, pengukuran kinerja, serta manajemen risiko yang efektif, selaras dengan peraturan perundang-undangan yang berlaku.	Terpenuhi
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.	The Board of Directors consistently develops and updates the Bank's IT governance framework to support business needs and priorities. The implementation of IT governance includes aligning IT strategic plan with business strategy, utilizing and optimizing IT resources, measuring performance, and effectively managing risks in accordance with applicable laws and regulations.	Complied
Rekomendasi 1.1.7: **Recommendation 1.1.7:**	**Keterangan:** **Description:**	**Status:**
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.	Sepanjang tahun 2025, Bank tidak menyelenggarakan kegiatan usaha yang berbasis pada prinsip syariah.	Penjelasan
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.	Throughout 2025, the Bank did not conduct any business activities based on sharia principles.	Explanation
Rekomendasi 1.1.8: **Recommendation 1.1.8:**	**Keterangan:** **Description:**	**Status:**
Piagam Direksi secara periodik ditinjau. Piagam mencakup, antara lain pembagian peran Direktur secara individual dapat diatur di Piagam Direksi atau dengan surat keputusan Direksi.	*BOD Charter* ditinjau secara rutin dan terakhir diperbarui pada 6 Desember 2023. Dokumen ini juga telah dipublikasikan pada situs web resmi Bank (www.victoriabank.co.id) untuk akses publik.	Terpenuhi
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.	BOD Charter is regularly reviewed and last updated on 6 December 2023. This document is also published on the Bank's official website (www.victoriabank.co.id) for public access.	Complied
Rekomendasi 1.1.9: **Recommendation 1.1.9:**	**Keterangan:** **Description:**	**Status:**
Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan.	Direksi memiliki *BOD Charter* yang memuat ketentuan pemberhentian anggota apabila terbukti melakukan pelanggaran atau terlibat dalam tindak kejahatan di bidang keuangan.	Terpenuhi
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.	The Board of Directors has BOD Charter that contains provisions for dismissing members if proven to have committed violations or been involved in financial crimes.	Complied

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:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris melakukan evaluasi formal tahunan secara objektif dan independen untuk menentukan efektivitas Direksi dan setiap individu Direktur.	Bank melaksanakan penilaian kinerja Direksi melalui 2 (dua) pendekatan, yakni evaluasi mandiri dan evaluasi oleh Dewan Komisaris, yang dilakukan minimal sekali setiap tahun. Proses ini bertujuan untuk memastikan efektivitas kepemimpinan serta pencapaian sasaran Bank, dengan rincian prosedur dan hasil penilaian disajikan dalam bagian Penilaian Kinerja Direksi pada Laporan Tahunan ini.	Terpenuhi
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.	The Bank conducts performance assessments of the Board of Directors through 2 (two) approaches, namely self-evaluation and evaluation by the Board of Commissioners, which are conducted at least once a year. This process aims to ensure leadership effectiveness and the achievement of the Bank's targets. Details of the procedures and assessment results are presented in the Board of Directors' Performance Assessment section of this Annual Report.	Complied
Rekomendasi 1.2.2: **Recommendation 1.2.2:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris dengan pertimbangan Komite Remunerasi dan Nominasi, bertanggung jawab menentukan kriteria evaluasi kinerja dan menilai kinerja Direktur Utama dan anggota Direksi lainnya.	Dewan Komisaris melakukan penilaian kinerja Direksi dengan menggunakan kriteria yang telah mempertimbangkan masukan dari Komite Remunerasi dan Nominasi.	Terpenuhi
The Board of Commissioners, with considerations from the Remuneration and Nomination Committee, is responsible for determining performance evaluation criteria and assessing the performance of the President Director and other members of the Board of Directors.	The Board of Commissioners assesses the Board of Directors' performance by using criteria that consider input from the Remuneration and Nomination Committee.	Complied

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:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris mengkaji ulang strategi korporasi paling tidak setiap tahun dan menyetujui misi, visi dan strategi korporasi yang dirumuskan oleh Direksi. Dewan Komisaris juga mengkaji ulang, 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.	Dewan Komisaris meninjau strategi Bank secara berkala setiap tahun dengan memberikan persetujuan atas dokumen RBB serta Rencana Kerja dan Anggaran Perusahaan (RKAP), termasuk revisinya. Selain itu, Dewan Komisaris memberikan arahan dan memantau pelaksanaan strategi melalui rapat bersama Direksi untuk mengevaluasi kinerja Bank. Sebagai bagian dari fungsi pengawasan, Dewan Komisaris menyusun Laporan Pengawasan RBB yang disampaikan kepada otoritas berwenang setiap semester.	Terpenuhi
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.	The Board of Commissioners periodically reviews the Bank's strategy on an annual basis by approving RBB document and Corporate Work Plan and Budget (RKAP), including their revisions. Furthermore, the Board of Commissioners provides direction and monitors strategy implementation through joint meetings with the Board of Directors to evaluate the Bank's performance. As part of its supervisory function, the Board of Commissioners prepares RBB Supervision Report which is submitted to the relevant authorities every semester.	Complied
Rekomendasi 1.3.2: **Recommendation 1.3.2:**	**Keterangan:** **Description:**	**Status:**
Jenis keputusan yang memerlukan persetujuan Dewan Komisaris harus diungkapkan dalam Laporan Tahunan.	Jenis keputusan yang memerlukan persetujuan Dewan Komisaris telah dijabarkan dan disampaikan dalam pembahasan Dewan Komisaris pada Laporan Tahunan ini.	Terpenuhi
The types of decisions that require the Board of Commissioners' approval must be disclosed in the Annual Report.	The types of decisions requiring Board of Commissioners' approval are outlined and presented in the discussion of the Board of Commissioners in this Annual Report.	Complied

Rekomendasi 1.3.3: **Recommendation 1.3.3:**	**Keterangan:** **Description:**	**Status:**
Dengan memperhatikan rekomendasi Komite Remunerasi dan Nominasi, 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.	Merujuk pada Pedoman Tata Tertib Komite Remunerasi dan Nominasi tanggal 5 Januari 2024 serta Kebijakan Penerapan Tata Kelola Remunerasi No. 011/SK-KOM/01/24 tanggal 17 Januari 2024, Dewan Komisaris berperan aktif dalam proses pengangkatan dan pemberhentian anggota Dewan Komisaris maupun Direksi. Proses nominasi dilakukan dengan mempertimbangkan rekomendasi Komite Remunerasi dan Nominasi, menjunjung prinsip keberagaman, kesetaraan, dan transparansi, serta memastikan integritas dan kualitas kepemimpinan di Bank.	Terpenuhi
Taking into account the recommendations from the Remuneration and Nomination 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.	Referring to the Remuneration and Nomination Committee's Code of Conduct dated 5 January 2024 and Remuneration Governance Implementation Policy No. 011/SK-KOM/01/24 dated 17 January 2024, the Board of Commissioners plays an active role in the process of appointing and dismissing members of the Board of Commissioners and Board of Directors. Nomination process is conducted by considering the recommendations of the Remuneration and Nomination Committee, upholding the principles of diversity, equality, and transparency, and ensuring the integrity and quality of leadership within the Bank.	Complied
Rekomendasi 1.3.4: **Recommendation 1.3.4:**	**Keterangan:** **Description:**	**Status:**
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.	Sebagai bagian dari persiapan regenerasi kepemimpinan, Bank menetapkan dan melaksanakan kebijakan suksesi Direksi sesuai Pedoman Kerja Komite Remunerasi dan Nominasi. Kebijakan ini dirancang untuk menjamin kelanjutan kepemimpinan yang efektif dan transparan, serta disampaikan dalam Laporan Tahunan sebagai bukti komitmen Bank terhadap penerapan GCG secara berkelanjutan.	Terpenuhi
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.	As part of preparation for leadership regeneration, the Bank has established and implemented Board of Directors' succession policy in accordance with the Remuneration and Nomination Committee's Charter. This policy is designed to ensure effective and transparent leadership continuity and is presented in the Annual Report as the evidence of the Bank's commitment to sustainable GCG implementation.	Complied
Rekomendasi 1.3.5: **Recommendation 1.3.5:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris: 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. 2. Secara berkala mengkaji ulang sistem remunerasi Direksi dan Dewan Komisaris.	Komite Remunerasi dan Nominasi menelaah dan membahas remunerasi Dewan Komisaris serta Direksi dengan mempertimbangkan skala dan kompleksitas usaha, perbandingan dengan peer group, tingkat inflasi, kondisi keuangan Bank, serta kesesuaian dengan peraturan perundang-undangan yang berlaku. Rekomendasi tersebut dipelajari oleh Dewan Komisaris dan diajukan kepada RUPS. Sistem remunerasi juga ditinjau secara berkala untuk menyesuaikan dengan perkembangan kegiatan Bank dan ketentuan yang berlaku.	Terpenuhi
The Board of Commissioners: 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. 2. Periodically reviews the remuneration system for the Board of Directors and Board of Commissioners.	The Remuneration and Nomination Committee reviews and discusses remuneration of the Board of Commissioners and Board of Directors by considering business scale and complexity, comparison with peer group, inflation rate, the Bank's financial condition, and compliance with applicable laws and regulations. Such recommendations are reviewed by the Board of Commissioners and submitted to the GMS. The remuneration system is also reviewed periodically to adjust it with the Bank's operational developments and applicable regulations.	Complied
Rekomendasi 1.3.6: **Recommendation 1.3.6:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris mengawasi efektivitas kebijakan governansi korporat dan implementasinya serta mengusulkan perubahan jika diperlukan.	Dewan Komisaris, baik secara langsung maupun melalui komite terkait, terus melakukan pengawasan terhadap kebijakan dan efektivitas penerapan tata kelola Bank, serta memberikan arahan dan rekomendasi perbaikan bila diperlukan.	Terpenuhi
The Board of Commissioners oversees the effectiveness of corporate governance policies and their implementation and proposes changes if necessary.	The Board of Commissioners, both directly and through relevant committees, continuously oversees the Bank's governance policies and effectiveness, and provides direction and recommendations for improvement when necessary.	Complied

Rekomendasi 1.3.7: Recommendation 1.3.7:	Keterangan: Description:	Status:
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.	Dewan Komisaris secara aktif memantau dan mengawasi kegiatan Bank dengan memberikan arahan dan nasihat kepada Direksi melalui pertemuan rutin. Diskusi dalam pertemuan ini mencakup penerapan manajemen risiko dan SPI, guna memastikan kedua aspek tersebut dijalankan secara efektif sesuai prinsip GCG.	Terpenuhi
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.	The Board of Commissioners actively monitors and supervises the Bank's activities by providing direction and advice to the Board of Directors through regular meetings. Discussions at these meetings cover the implementation of risk management and SPI, to ensure both aspects are implemented effectively in accordance with GCG principles.	Complied
Rekomendasi 1.3.8: Recommendation 1.3.8:	**Keterangan: Description:**	**Status:**
Dewan Komisaris mengawasi dan mengarahkan agar tercapai integritas akuntansi dan sistem pelaporan keuangan korporat, serta independensi fungsi audit internal dan eksternal.	Dewan Komisaris telah melakukan diskusi dengan Direksi terkait penunjukan kantor akuntan publik untuk audit Laporan Keuangan Tahunan, sekaligus membahas rencana audit Bank. Langkah ini bertujuan memastikan integritas akuntansi, keandalan sistem pelaporan keuangan, serta menjaga independensi audit internal dan eksternal.	Terpenuhi
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.	The Board of Commissioners has discussed with Board of Directors regarding the appointment of public accounting firm to audit the Annual Financial Statements, as well as the Bank's audit plan. This step aims to ensure accounting integrity, financial reporting system reliability, and maintain the independence of internal and external audits.	Complied
Rekomendasi 1.3.9: Recommendation 1.3.9:	**Keterangan: Description:**	**Status:**
Dewan Komisaris memantau, mengkaji ulang, dan menyetujui Laporan Tahunan dan Laporan Keberlanjutan korporasi serta memastikan integritasnya, serta mengawasi proses pengungkapan dan pengkomunikasian korporasi.	Dewan Komisaris secara aktif memantau dan menelaah penyusunan Laporan Tahunan Bank, termasuk memastikan penyajian informasi yang relevan mengenai Dewan Komisaris sesuai ketentuan yang berlaku.	Terpenuhi
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.	The Board of Commissioners actively monitors and reviews the preparation of the Bank's Annual Report, including ensuring the presentation of relevant information regarding the Board of Commissioners in accordance with applicable regulations.	Complied
Rekomendasi 1.3.10: Recommendation 1.3.10:	**Keterangan: Description:**	**Status:**
Piagam Dewan Komisaris secara periodik ditinjau.	*BOC Charter* ditinjau secara rutin dan terakhir diperbarui pada 6 Desember 2023. Dokumen ini telah dipublikasikan di situs web resmi Bank (www.victoriabank.co.id) untuk akses publik.	Terpenuhi
The Board of Commissioners Charter is periodically reviewed.	BOC Charter is regularly reviewed and lastly updated on 6 December 2023. This document has been published on the Bank's official website (www.victoriabank.co.id) for public access.	Complied
Rekomendasi 1.3.11: Recommendation 1.3.11:	**Keterangan: Description:**	**Status:**
Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan.	Dewan Komisaris memiliki *BOC Charter* yang memuat ketentuan pemberhentian anggota apabila terbukti melakukan pelanggaran atau terlibat dalam tindak kejahatan keuangan.	Terpenuhi
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.	The Board of Commissioners has BOC Charter that contains provisions for dismissing members if proven to have committed violations or been involved in financial crimes.	Complied
Rekomendasi 1.3.12: Recommendation 1.3.12:	**Keterangan: Description:**	**Status:**
Komisaris independen sangat diharapkan untuk dapat berkontribusi dalam diskusi yang jujur, objektif, aktif, dan konstruktif pada rapat Dewan Komisaris.	Seluruh Komisaris Independen tidak memiliki keterkaitan keuangan, jabatan, kepemilikan saham, maupun hubungan keluarga dengan Direksi, Dewan Komisaris lain, Pemegang Saham Pengendali, atau pihak lain yang dapat memengaruhi independensi mereka. Hal ini menjamin objektivitas Komisaris Independen dalam melaksanakan tugas, sehingga mampu berperan aktif, objektif, dan konstruktif dalam fungsi pengawasan.	Terpenuhi

Independent commissioners are highly expected to be able to contribute to honest, objective, active, and constructive discussions at the Board of Commissioners' meetings.	All Independent Commissioners have no financial, positional, shareholding, or family relationships with the Board of Directors, other Board of Commissioners, Controlling Shareholders, or other parties that could affect their independence. This ensures the objectivity of Independent Commissioners in performing their duties, thus enabling them to play an active, objective, and constructive role in the supervisory function.	Complied
Rekomendasi 1.3.13: **Recommendation 1.3.13:**	**Keterangan:** **Description:**	**Status:**
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.	Komisaris Utama telah melaksanakan tugasnya secara maksimal, termasuk sebagai koordinator Dewan Komisaris untuk memastikan efektivitas pelaksanaan fungsi pengawasan. Kepemimpinan Komisaris Utama terlihat dalam memimpin rapat sesuai agenda yang ditetapkan serta mendorong pengambilan keputusan secara kolegial.	Terpenuhi
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.	The President Commissioner has performed duties to the fullest extent, including as coordinator of the Board of Commissioners, ensuring the effective implementation of supervisory function. President Commissioner's leadership is evident in leading meetings according to the established agenda and encouraging collegial decision-making.	Complied
Rekomendasi 1.4: Pembentukan Komite. **Recommendation 1.4: Establishment of a Committee.**		
Rekomendasi 1.4.1: **Recommendation 1.4.1:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki komite-komite di bawah Dewan Komisaris sekurang-kurangnya terdiri dari: Komite Audit, Komite Remunerasi dan Nominasi, dan Komite Pemantau Manajemen Risiko.	Dewan Komisaris telah membentuk beberapa komite pendukung, yaitu Komite Pemantau Risiko, Komite Remunerasi dan Nominasi, serta Komite Audit, untuk membantu pelaksanaan fungsi pengawasan secara lebih efektif.	Terpenuhi
The Corporation has committees under the Board of Commissioners, consisting of at least: Audit Committee, Remuneration and Nomination Committee, and Risk Management Monitoring Committee.	Board of Commissioners has established several supporting committees, namely Risk Monitoring Committee, Remuneration and Nomination Committee, and Audit Committee, to help carry out supervisory function more effectively.	Complied
Rekomendasi 1.4.2: **Recommendation 1.4.2:**	**Keterangan:** **Description:**	**Status:**
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.	Dewan Komisaris memastikan seluruh anggota Komite Audit terdiri dari Komisaris Independen dan pihak independen (non-komisaris) yang memiliki kompetensi sesuai kebutuhan pelaksanaan tugas. Pelaksanaan tugas Komite Audit dilakukan secara efektif dan independen untuk mendukung pengawasan yang optimal.	Terpenuhi
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.	The Board of Commissioners ensures that all members of Audit Committee consist of Independent Commissioners and independent parties (non-commissioners) with competencies needed to carry out duties. Audit Committee's duties are carried out effectively and independently to support optimal oversight.	Complied
Rekomendasi 1.4.3: **Recommendation 1.4.3:**	**Keterangan:** **Description:**	**Status:**
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.	Jabatan Ketua Komite Audit dipegang oleh Zaenal Abidin, Ph.D, yang juga menjabat sebagai Komisaris Utama Independen. Bank memastikan independensi beliau tetap terjaga dalam melaksanakan tugas dan tanggung jawab sebagai Ketua Komite Audit.	Penjelasan
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.	The position of Chairman of Audit Committee is held by Zaenal Abidin, Ph.D, who also serves as Independent President Commissioner. The Bank ensures that his independence is maintained in performing his duties and responsibilities as Chairman of the Audit Committee.	Explanation

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:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris melakukan evaluasi formal tahunan secara objektif untuk menentukan efektivitas Dewan, komitenya, dan setiap individu Komisaris.	Penilaian kinerja Dewan Komisaris beserta komite-komitenya dilaksanakan secara tahunan minimal sekali dalam setahun, dengan menggunakan kriteria tertentu yang dijabarkan dalam Laporan Tahunan ini.	Terpenuhi
The Board of Commissioners conducts an annual formal evaluation objectively to determine the effectiveness of the Board, its committees, and each individual Commissioner.	The performance assessments of the Board of Commissioners and its committees are carried out at least once a year, by using specific criteria outlined in this Annual Report.	Complied

Rekomendasi 1.6: Benturan Kepentingan.
Recommendation 1.6: Conflict of Interest.

Rekomendasi 1.6.1: **Recommendation 1.6.1:**	**Keterangan:** **Description:**	**Status:**
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.	Seluruh anggota Direksi Bank tidak menjabat di posisi lain secara bersamaan.	Terpenuhi
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.	All members of the Bank's Board of Directors do not hold other positions concurrently.	Complied
Rekomendasi 1.6.2: **Recommendation 1.6.2:**	**Keterangan:** **Description:**	**Status:**
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.	Dewan Komisaris secara aktif memantau dan mengelola potensi benturan kepentingan di Bank. Seluruh anggota berkomitmen untuk menghindari situasi yang dapat menimbulkan benturan kepentingan, sebagaimana diatur dalam *BOC Charter*. Jika terjadi benturan kepentingan, anggota dilarang mengambil tindakan yang merugikan Bank dan wajib mengungkapkan potensi benturan tersebut dalam setiap pengambilan keputusan.	Terpenuhi
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.	The Board of Commissioners actively monitors and manages potential conflicts of interest within the Bank. All members are committed to avoiding situations that could give rise to a conflict of interest, as stipulated in BOC Charter. In the event of a conflict of interest, members are prohibited from taking actions detrimental to the Bank and are required to disclose such potential conflicts in all decision-making processes.	Complied

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:**	**Keterangan:** **Description:**	**Status:**
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.	Sebelum menjalankan tugas dan fungsinya, Dewan Komisaris dan Direksi mengikuti program induksi untuk memastikan pemahaman menyeluruh atas tanggung jawab masing-masing sesuai ketentuan regulasi. Secara berkala, Dewan Komisaris dan Direksi juga mengikuti program pengembangan kompetensi guna memperbarui dan meningkatkan keterampilan serta pengetahuan yang mendukung pelaksanaan peran secara efektif.	Terpenuhi
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.	Before carrying out their duties and functions, the Board of Commissioners and Board of Directors attend an induction program to ensure a thorough understanding of their respective responsibilities in accordance with regulatory requirements. The Board of Commissioners and Board of Directors also periodically attend competency development programs to update and enhance their skills and knowledge that support the effective implementation of their roles.	Complied

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.

Rekomendasi 2.1.1: **Recommendation 2.1.1:**	**Keterangan:** **Description:**	**Status:**
Dalam menentukan kandidat calon Direktur, Dewan Komisaris melalui Komite Remunerasi dan Nominasi tidak hanya mengandalkan rekomendasi dari Dewan Komisaris, manajemen atau Pemegang Saham mayoritas. Dewan Komisaris melalui Komite Remunerasi dan Nominasi dapat menggunakan sumber independen untuk menentukan kandidat yang memenuhi syarat.	Bank saat ini belum melibatkan pihak ketiga independen dalam proses seleksi calon Dewan Komisaris. Meski demikian, Bank tetap memastikan bahwa penunjukan kandidat Direksi dan Dewan Komisaris dilakukan sesuai peraturan yang berlaku serta memenuhi kualifikasi yang dibutuhkan.	Penjelasan
In determining Director candidates, the Board of Commissioners, through the Remuneration and Nomination Committee, does not rely solely on recommendations from the Board of Commissioners, management, or majority shareholders. The Board of Commissioners, through the Remuneration and Nomination Committee, may use independent sources to determine qualified candidates.	The Bank currently does not involve independent third parties in the selection process for candidates for the Board of Commissioners. Nevertheless, the Bank ensures that the appointment of candidates for the Board of Directors and Board of Commissioners is carried out in accordance with applicable regulations and meets the required qualifications.	Explanation
Rekomendasi 2.1.2: **Recommendation 2.1.2:**	**Keterangan:** **Description:**	**Status:**
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.	Dewan Komisaris, melalui Komite Remunerasi dan Nominasi, melakukan seleksi kandidat Direksi berdasarkan kriteria yang telah ditetapkan untuk memastikan kesesuaian dengan kebutuhan Bank.	Terpenuhi
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.	The Board of Commissioners, through the Remuneration and Nomination Committee, selects candidates for the Board of Directors based on the established criteria to ensure they meet the Bank's needs.	Complied
Rekomendasi 2.1.3: **Recommendation 2.1.3:**	**Keterangan:** **Description:**	**Status:**
Kebijakan korporasi tentang keberagaman pada, Direksi dan Dewan Komisaris diungkapkan dalam Laporan Tahunan.	Kebijakan terkait keberagaman anggota Dewan Komisaris dan Direksi Bank disampaikan secara transparan dalam Laporan Tahunan ini.	Terpenuhi
The corporate policy on diversity in the Board of Directors and Board of Commissioners is disclosed in the Annual Report.	The Bank's policies regarding diversity in the Board of Commissioners and Board of Directors are transparently communicated in this Annual Report.	Complied
Rekomendasi 2.1.4: **Recommendation 2.1.4:**	**Keterangan:** **Description:**	**Status:**
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.	Dewan Komisaris, bersama Komite Remunerasi dan Nominasi, melaksanakan fungsi pengawasan untuk memastikan proses nominasi dan remunerasi di Bank berjalan transparan dan tepat. Langkah ini bertujuan menjaga kepentingan Bank sekaligus mendukung praktik tata kelola yang adil dan berintegritas dalam pengelolaan HC.	Terpenuhi
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.	The Board of Commissioners, together with the Remuneration and Nomination Committee, performs supervisory function to ensure the Bank's nomination and remuneration processes are transparent and appropriate. This measure aims to safeguard the Bank's interests while supporting fair and consistent governance practices in HC management.	Complied
Rekomendasi 2.1.5: **Recommendation 2.1.5:**	**Keterangan:** **Description:**	**Status:**
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.	Komite Remunerasi dan Nominasi melaksanakan fungsi nominasi sesuai prosedur dan kriteria yang tercantum dalam Pedoman dan Tata Tertib Komite No. 001/SK-KOM/01/24 tanggal 5 Januari 2024, serta Kebijakan Penerapan Tata Kelola Remunerasi No. 011/SK-KOM/01/24 tanggal 17 Januari 2024, yang telah mendapatkan persetujuan Dewan Komisaris.	Terpenuhi
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.	The Remuneration and Nomination Committee carries out its nomination function in accordance with the procedures and criteria set out in the Committee's Charter No. 001/SK-KOM/01/24 dated 5 January 2024 and the Remuneration Governance Implementation Policy No. 011/SK-KOM/01/24 dated 17 January 2024, which have been approved by the Board of Commissioners.	Complied

Rekomendasi 2.1.6: **Recommendation 2.1.6:**	**Keterangan:** **Description:**	**Status:**
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.	Bank menerapkan prinsip keberagaman dalam komposisi Dewan Komisaris sesuai arahan Otoritas Jasa Keuangan, sebagaimana diatur dalam Lampiran Surat Edaran Otoritas Jasa Keuangan No. 32/SEOJK.04/2015 tentang Pedoman Tata Kelola Perusahaan Terbuka, untuk mendukung pengambilan keputusan yang inklusif dan efektif.	Terpenuhi
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.	The Bank implements the principle of diversity in the composition of the Board of Commissioners in accordance with Financial Services Authority direction, as stipulated in the Attachment to the Financial Services Authority Circular No. 32/SEOJK.04/2015 on Guidelines for Public Company's Governance, to support inclusive and effective decision-making.	Complied
Rekomendasi 2.1.7: **Recommendation 2.1.7:**	**Keterangan:** **Description:**	**Status:**
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.	Dewan Komisaris memiliki jumlah Komisaris Independen sesuai ketentuan peraturan perundang-undangan yang berlaku. Rincian informasi mengenai hal ini disajikan secara lengkap dalam Laporan Tahunan Bank.	Terpenuhi
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.	The Board of Commissioners has a number of Independent Commissioners in accordance with applicable laws and regulations. Detailed information regarding this matter is fully presented in the Bank's Annual Report.	Complied
Rekomendasi 2.1.8: **Recommendation 2.1.8:**	**Keterangan:** **Description:**	**Status:**
Untuk memfasilitasi fungsi Direksi dan Dewan Komisaris yang efektif dan guna meningkatkan kepercayaan investor dan pemangku kepentingan, Komite Remunerasi dan Nominasi memastikan bahwa terdapat proses yang formal, ketat, dan transparan untuk penunjukan dan pengangkatan anggota Direksi dan Dewan Komisaris.	Komite Remunerasi dan Nominasi melaksanakan tanggung jawabnya untuk memastikan proses nominasi dan pemberian remunerasi di Bank berlangsung secara tepat, transparan, dan sesuai kepentingan Bank. Pelaksanaan fungsi ini dijabarkan secara rinci dalam Laporan Tahunan.	Terpenuhi
To facilitate effective function of the Board of Directors and Board of Commissioners and to increase investors and stakeholders trust, the Remuneration and Nomination 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.	The Remuneration and Nomination Committee carries out its responsibilities to ensure that the Bank's nomination and remuneration processes are conducted appropriately, transparently, and in accordance with the Bank's interests. The implementation of this function is detailed in the Annual Report.	Complied

Rekomendasi 2.2: Remunerasi Direksi dan Dewan Komisaris.
Recommendation 2.2: Remuneration of the Board of Directors and Board of Commissioners.

Rekomendasi 2.2.1: **Recommendation 2.2.1:**	**Keterangan:** **Description:**	**Status:**
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 Remunerasi dan Nominasi, 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.	Bank menetapkan dan menerapkan Kebijakan Tata Kelola Remunerasi melalui Keputusan Direksi No. 011/SK-DIR/01/24 tanggal 17 Januari 2024. Kebijakan ini dirancang untuk menjamin sistem remunerasi yang kompetitif, adil, dan seimbang, sesuai peraturan perundang-undangan, serta ditinjau secara berkala untuk menjaga relevansi dan efektivitasnya.	Terpenuhi
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 Remuneration and Nomination 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.	The Bank establishes and implements Remuneration Governance Policy through the Board of Directors' Decision No. 011/SK-DIR/01/24 dated 17 January 2024. This policy is designed to ensure a competitive, fair, and balanced remuneration system, in accordance with laws and regulations, and is periodically reviewed to maintain its relevance and effectiveness.	Complied

Rekomendasi 2.2.2: Recommendation 2.2.2:	Keterangan: Description:	Status:
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.	Bank menetapkan struktur, kebijakan, dan besaran remunerasi bagi setiap anggota Dewan Komisaris dengan mempertimbangkan tanggung jawab, wewenang, tugas, dan kinerja masing-masing. Penetapan ini juga memperhatikan standar remunerasi di industri sejenis serta kapasitas keuangan Bank.	Terpenuhi
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.	The Bank establishes the structure, policies, and remuneration amount for each member of the Board of Commissioners, by considering respective responsibilities, authorities, duties, and performance. This determination also considers remuneration standards in similar industries and the Bank's financial capacity.	Complied
Rekomendasi 2.2.3: **Recommendation 2.2.3:**	**Keterangan:** **Description:**	**Status:**
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 Remunerasi dan Nominasi memastikan bahwa terdapat prosedur yang adil dan transparan untuk menetapkan kebijakan remunerasi anggota Direksi dan Dewan Komisaris.	Komite Remunerasi dan Nominasi meninjau dan membahas remunerasi Dewan Komisaris dengan memperhitungkan skala dan kompleksitas usaha, perbandingan dengan *peer group*, inflasi, serta kondisi dan kapasitas keuangan Bank, sesuai ketentuan peraturan yang berlaku. Keputusan akhir mengenai remunerasi Dewan Komisaris dan Direksi ditetapkan melalui RUPS.	Terpenuhi
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 Remuneration and Nomination Committee ensures that there are fair and transparent procedures for establishing remuneration policies for members of the Board of Directors and Board of Commissioners.	The Remuneration and Nomination Committee reviews and discusses remuneration of the Board of Commissioners, by considering business scale and complexity, comparison with peer groups, inflation, and the Bank's financial condition and capacity, in line with applicable laws and regulations. The final decision regarding remuneration of the Board of Commissioners and Board of Directors is determined through the GMS.	Complied

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:	Keterangan: Description:	Status:
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.	Dewan Komisaris dan Direksi bekerja secara kolaboratif dalam merumuskan visi, misi, dan strategi Bank melalui rapat resmi serta forum diskusi dan pertemuan lainnya.	Terpenuhi
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.	The Board of Commissioners and Board of Directors work collaboratively to formulate the Bank's vision, mission, and strategy through formal meetings, discussion forums, and other meetings.	Complied
Rekomendasi 3.1.2: **Recommendation 3.1.2:**	**Keterangan:** **Description:**	**Status:**
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.	Bank secara konsisten menyusun strategi dan kebijakan jangka pendek maupun menengah dalam RBB yang selaras dengan visi dan misi perusahaan. Untuk memastikan efektivitasnya, Direksi bersama Dewan Komisaris serta manajemen senior secara berkala melakukan peninjauan dan evaluasi menyeluruh terhadap strategi, kebijakan, serta pelaksanaannya di seluruh tingkatan organisasi.	Terpenuhi
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.	The Bank consistently develops short- and medium-term strategies and policies within RBB that are in line with the Company's vision and mission. To ensure their effectiveness, the Board of Directors, along with Board of Commissioners and senior management, regularly conducts comprehensive review and evaluation of strategies, policies, and their implementation at all levels of the organization.	Complied

Rekomendasi 3.1.3: **Recommendation 3.1.3:**	**Keterangan:** **Description:**	**Status:**
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.	Sebagai Kepala Divisi *Corporate Secretary*, Caprie Ardira Azhar berperan penting dalam memperkuat koordinasi antara Direksi dan Dewan Komisaris. Selain itu, beliau juga berkontribusi aktif dalam mendorong penerapan prinsip GCG, khususnya melalui pengelolaan komunikasi yang efektif dengan Pemegang Saham dan berbagai pemangku kepentingan.	Terpenuhi
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.	As the Head of Corporate Secretary Division, Mr. Caprie Ardira Azhar plays a key role in strengthening coordination between the Board of Directors and Board of Commissioners. Furthermore, he actively contributes to promoting GCG principles implementation, particularly through effective communication with Shareholders and various stakeholders.	Complied

Rekomendasi 3.2: Akses informasi Dewan Komisaris.
Recommendation 3.2: Access to Information for the Board of Commissioners.

Rekomendasi 3.2.1: **Recommendation 3.2.1:**	**Keterangan:** **Description:**	**Status:**
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.	Direksi berkomitmen mendukung peran pengawasan Dewan Komisaris dengan menyediakan akses informasi yang lengkap, relevan, dan tepat waktu. Ketentuan dalam Anggaran Dasar serta kebijakan internal Bank juga menjamin hak Dewan Komisaris untuk memperoleh informasi, termasuk meminta data tambahan dari Direksi apabila diperlukan guna memperkuat efektivitas pengawasan.	Terpenuhi
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.	The Board of Directors is committed to supporting the Board of Commissioners' supervisory role by providing access to complete, relevant, and timely information. Provisions in the Bank's Articles of Association and internal policies also guarantee the Board of Commissioners' rights to obtain information, including requesting additional data from the Board of Directors if necessary to strengthen oversight effectiveness.	Complied

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.

Rekomendasi 3.3.1: **Recommendation 3.3.1:**	**Keterangan:** **Description:**	**Status:**
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.	Dalam menjalankan peran dan kewenangannya, Dewan Komisaris serta Direksi Bank senantiasa menunaikan tugas dan tanggung jawab dengan menjunjung tinggi prinsip independensi serta menjaga objektivitas dalam setiap pengambilan keputusan.	Terpenuhi
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.	In carrying out roles and authorities, the Board of Commissioners and Board of Directors consistently fulfill their duties and responsibilities by upholding the principle of independence and maintaining objectivity in all decision-making.	Complied

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:**	**Keterangan:** **Description:**	**Status:**
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: 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. 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.	Sebagai wujud komitmen terhadap integritas dan tata kelola yang baik, Bank telah menetapkan Pedoman Kode Etik Perilaku Karyawan serta kebijakan penerapan strategi anti-fraud. Seluruh ketentuan tersebut menjadi acuan bagi setiap insan Bank dalam melaksanakan tugas dan tanggung jawabnya. Penjelasan lebih rinci mengenai kebijakan tersebut dapat ditemukan dalam Laporan Tahunan ini.	Terpenuhi
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: 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. 11. Ensure complete, fair, accurate, timely, and understandable disclosure in reports and documents submitted by the corporation to regulators and in other public communications.	As the manifestation of its commitment to integrity and good governance, the Bank has established Employee's Code of Conduct and anti-fraud strategy implementation policy. All of such provisions serve as a reference for every Bank personnel in performing duties and responsibilities. A more detailed explanation of these policies can be found in this Annual Report.	Complied

Rekomendasi 4.1.2: Recommendation 4.1.2:	Keterangan: Description:	Status:
Direksi menetapkan kebijakan dan praktik anti-pencucian uang dan pendanaan terorisme, anti-suap, anti-korupsi, anti-kecurangan (*anti-fraud*), keterlibatan dalam politik dengan mengacu pada standar nasional atau internasional mengenai anti-pencucian uang, anti-suap, anti-korupsi, anti-kecurangan, atau standar terkait lainnya.	Untuk memperkuat budaya integritas dan menjaga kepercayaan pemangku kepentingan, Bank menetapkan Pedoman Kode Etik Perilaku Karyawan serta Kebijakan Strategi Anti-*Fraud* sebagai landasan dalam setiap aktivitas operasional. Kedua kebijakan tersebut menjadi acuan wajib bagi seluruh insan Bank dalam bertindak profesional dan menjunjung tinggi prinsip GCG. Uraian lebih lanjut mengenai implementasi kebijakan ini disajikan dalam Laporan Tahunan ini.	Terpenuhi
The Board of Directors establishes policies and practices for anti-money laundering and terrorist 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.	To strengthen a culture of integrity and maintain stakeholder trust, the Bank has established Employee's Code of Conduct and Anti-Fraud Strategy Policy as the basis for all operational activities. The two policies serve as mandatory guidelines for all Bank personnel to act professionally and uphold GCG principles. Further details on the implementation of these policies are presented in this Annual Report.	Complied

Rekomendasi 4.2: Nilai–Nilai dan Budaya Organisasi.
Recommendation 4.2: Corporate Values and Culture.

Rekomendasi 4.2.1: Recommendation 4.2.1:	Keterangan: Description:	Status:
Korporasi mengartikulasikan, menumbuhkan, dan mengungkapkan budaya serta nilai-nilai korporasi.	Bank menjadikan SQEW sebagai nilai fundamental yang wajib dijalankan oleh seluruh insan dalam setiap aktivitas kerja. Nilai tersebut diinternalisasikan melalui beragam program dan inisiatif yang dirancang secara berkesinambungan, disertai evaluasi rutin untuk memastikan penerapannya berlangsung konsisten dan efektif di seluruh lini organisasi.	Terpenuhi
The corporation articulates, fosters, and discloses corporate culture and values.	The Bank has made SQEW a fundamental value that must be implemented by all personnel in all work activities. These values are internalized through various programs and initiatives designed on an ongoing basis, accompanied by regular evaluations to ensure consistent and effective implementation across the organization.	Complied

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:	Keterangan: Description:	Status:
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.	Direksi berkomitmen menanamkan nilai-nilai Kode Etik sebagai bagian dari pembentukan budaya kerja yang berintegritas. Proses internalisasi tersebut diterapkan secara terstruktur dalam strategi bisnis maupun operasional Bank, serta diintegrasikan ke dalam mekanisme manajemen risiko dan kebijakan remunerasi.	Terpenuhi
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.	The Board of Directors is committed to instilling the values of Code of Conduct as part of establishing a work culture of integrity. This internalization process is implemented in a structured manner within the Bank's business and operational strategies, and integrated into risk management mechanism and remuneration policies.	Complied

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:	Keterangan: Description:	Status:
Direksi melakukan kaji ulang secara berkala atas ketepatan desain dan efektivitas operasional sistem governansi, pengelolaan risiko, pengendalian internal dan kepatuhan korporasi dan melaporkan pelaksanaan dan hasil kaji ulang kepada para Pemegang Saham melalui Laporan Tahunan Korporasi.	Direksi secara berkesinambungan melaksanakan penerapan, evaluasi, dan penyempurnaan atas tata kelola, manajemen risiko, pengendalian internal, serta kepatuhan Bank. Seluruh hasil pelaksanaan tersebut disampaikan melalui Laporan Tahunan sebagai bentuk pertanggungjawaban kepada Pemegang Saham dan pemangku kepentingan, serta dilaporkan lebih lanjut dalam RUPS.	Terpenuhi
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.	The Board of Directors is committed to instilling the values of Code of Conduct as part of establishing a work culture of integrity. This internalization process is implemented in a structured manner within the Bank's business and operational strategies, and integrated into risk management mechanism and remuneration policies.	Complied

Rekomendasi 5.2: Manajemen Risiko.
Recommendation 5.2: Risk Management.

Rekomendasi 5.2.1: Recommendation 5.2.1:	Keterangan: Description:	Status:
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.	Dewan Komisaris dan Direksi berkomitmen mengelola serta memantau risiko utama Bank secara terukur dan berkesinambungan. Kebijakan strategis diarahkan untuk menjaga keseimbangan antara profil risiko, budaya kepatuhan, dan kecukupan modal. Dalam pelaksanaannya, Dewan Komisaris dan Direksi didukung oleh Komite Pemantau Risiko, Komite Manajemen Risiko, serta SKAI yang secara berkala melakukan penelaahan atas efektivitas pengendalian dan pengelolaan risiko.	Terpenuhi
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.	The Board of Commissioners and Board of Directors are committed to managing and monitoring the Bank's key risks in a measurable and sustainable manner. Strategic policies are directed at maintaining a balance between risk profile, compliance culture, and capital adequacy. In its implementation, the Board of Commissioners and Board of Directors are supported by Risk Monitoring Committee, Risk Management Committee, and SKAI, which periodically review the effectiveness of risk control and management.	Complied
Rekomendasi 5.2.2: Recommendation 5.2.2:	**Keterangan: Description:**	**Status:**
Komite Pemantau Manajemen Risiko membantu pelaksanaan tugas Dewan Komisaris dengan menciptakan mekanisme yang transparan, fokus, dan independen dalam pengawasan manajemen risiko korporasi.	Sebagai komite yang berada di bawah Dewan Komisaris, Komite Pemantau Risiko berperan mendukung efektivitas fungsi pengawasan melalui penerapan mekanisme pengawasan manajemen risiko yang independen, objektif, dan transparan. Seluruh aktivitas komite dijalankan berdasarkan pedoman yang tertuang dalam Piagam Komite Pemantau Risiko.	Terpenuhi
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.	As a committee under the Board of Commissioners, the Risk Monitoring Committee plays a role in supporting the effectiveness of supervisory function by implementing oversight mechanism of an independent, objective, and transparent risk management. All committee activities are carried out based on the guidelines outlined in the Risk Monitoring Committee Charter.	Complied

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:	Keterangan: Description:	Status:
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.	Direksi mengembangkan sistem tata kelola, manajemen risiko, dan kepatuhan (GRC) yang terintegrasi sebagai fondasi pengelolaan organisasi. Melalui pendekatan terpadu dalam menghadapi berbagai ketidakpastian dan berlandaskan integritas, sistem ini dirancang untuk memastikan Bank dapat mencapai sasaran strategis yang telah ditetapkan.	Terpenuhi
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.	The Board of Directors develops an integrated governance, risk management, and compliance (GRC) system as the basis of organizational management. Through an integrated approach based on integrity in facing various uncertainties, this system is designed to ensure the Bank achieves its established strategic objectives.	Complied
Rekomendasi 5.3.2: Recommendation 5.3.2:	**Keterangan: Description:**	**Status:**
Direksi memastikan bahwa bagian yang membawahi fungsi kepatuhan tidak merangkap melaksanakan fungsi yang berpotensi menimbulkan benturan kepentingan.	Direktur Kepatuhan dan Manajemen Risiko beserta unit yang berada di bawah koordinasinya menjalankan fungsi kepatuhan secara independen tanpa merangkap tugas lain yang dapat menimbulkan potensi benturan kepentingan. Hal ini tercermin dalam struktur organisasi Bank sebagaimana disajikan dalam Laporan Tahunan ini.	Terpenuhi
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.	The Director of Compliance and Risk Management and the units under his/her coordination carry out compliance function independently without concurrent duties that could create a potential conflict of interest. This is reflected in the Bank's organizational structure, as presented in this Annual Report.	Complied

Rekomendasi 5.4: Audit Internal.
Recommendation 5.4: Internal Audit.

Rekomendasi 5.4.1: Recommendation 5.4.1:	Keterangan: Description:	Status:
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.	Dewan Komisaris melalui Komite Audit memastikan bahwa pelaksanaan fungsi audit internal Bank berjalan sesuai dengan kebutuhan organisasi, dengan menjunjung tinggi objektivitas serta berorientasi pada pencapaian tujuan yang strategis dan terukur.	Terpenuhi
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.	The Board of Commissioners, through Audit Committee, ensures that the Bank's internal audit function is implemented in accordance with organizational needs, upholding objectivity and oriented towards achieving strategic and measurable objectives.	Complied

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:	Keterangan: Description:	Status:
Korporasi memiliki kebijakan dan prosedur pengungkapan dan transparansi yang memastikan pengungkapan informasi material dan menjaga informasi sensitif serta rahasia korporasi.	Anggaran Dasar Bank memuat ketentuan mengenai keterbukaan informasi, termasuk kewajiban pengungkapan informasi material sesuai peraturan yang berlaku, sekaligus mengatur perlindungan terhadap informasi yang bersifat sensitif dan rahasia.	Terpenuhi
The corporation has disclosure and transparency policies and procedures that ensure disclosure of material information and safeguard sensitive information as well as corporate secrets.	The Bank's Articles of Association contain provisions regarding information disclosure, including obligation to disclose material information in line with applicable regulations, while also regulating the protection of sensitive and confidential information.	Complied
Rekomendasi 6.1.2: Recommendation 6.1.2:	**Keterangan:** Description:	**Status:**
Hak Pemegang Saham untuk memperoleh secara teratur dan tepat waktu informasi material yang relevan tentang korporasi harus dipenuhi.	Bank menjamin kesetaraan hak bagi seluruh Pemegang Saham dalam memperoleh informasi material yang relevan, akurat, dan disampaikan secara tepat waktu. Penyampaian informasi tersebut dilaksanakan sesuai ketentuan peraturan yang berlaku, guna memastikan terwujudnya prinsip transparansi dan keadilan dalam pengelolaan Bank.	Terpenuhi
Shareholders' rights to obtain regularly and timely relevant material information regarding the corporation must be fulfilled.	The Bank guarantees equal rights for all Shareholders to obtain relevant, accurate, and timely material information. This information is presented in accordance with applicable regulations to ensure the realization of principles of transparency and fairness in the Bank's management.	Complied

Rekomendasi 6.2: Laporan Keuangan dan Keberlanjutan.
Recommendation 6.2: Financial Statements and Sustainability Report.

Rekomendasi 6.2.1: Recommendation 6.2.1:	Keterangan: Description:	Status:
Korporasi mengungkapkan sistem dan prosedur untuk memastikan bahwa Laporan Keuangan Interim yang tidak diaudit atau dikaji ulang oleh auditor eksternal secara material adalah akurat, lengkap, dan memberikan investor informasi yang tepat untuk membuat keputusan investasi yang tepat.	Bank menerapkan kebijakan internal yang memastikan setiap informasi keuangan ditelaah secara cermat sebelum disampaikan kepada publik maupun otoritas. Melalui peran Komite Audit, Bank melakukan peninjauan atas Laporan Keuangan, proyeksi, serta berbagai laporan lain yang berkaitan dengan informasi keuangan guna menjamin akurasi dan kepatuhan terhadap ketentuan yang berlaku.	Terpenuhi
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.	The Bank implements internal policies that ensure all financial information is carefully reviewed prior to being disclosed to the public or authorities. Through the role of Audit Committee, the Bank reviews its Financial Statements, projections, and various other reports related to financial information to ensure accuracy and compliance with applicable regulations.	Complied

Rekomendasi 6.2.2: Recommendation 6.2.2:	Keterangan: Description:	Status:
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.	Salah satu tugas Komite Audit adalah menelaah pelaksanaan audit atas laporan keuangan historis tahunan yang dilakukan oleh akuntan publik maupun kantor akuntan publik, guna memastikan kualitas, independensi, serta kepatuhan terhadap standar yang berlaku.	Terpenuhi
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.	One duty of the Audit Committee is to review the audits of annual historical financial statements conducted by public accountant and public accounting firm to ensure its quality, independence, and compliance with applicable standards.	Complied
Rekomendasi 6.2.3: **Recommendation 6.2.3:**	**Keterangan:** **Description:**	**Status:**
Laporan Keberlanjutan harus disiapkan dan diungkapkan dengan akurat dan disusun sesuai kerangka pelaporan keberlanjutan nasional atau internasional.	Laporan Keberlanjutan Bank disusun dengan mengacu pada kerangka pelaporan keberlanjutan yang ditetapkan oleh Otoritas Jasa Keuangan, sehingga penyajian informasi dilakukan secara transparan dan sesuai dengan standar regulasi yang berlaku.	Terpenuhi
The Sustainability Report shall be accurately prepared and disclosed and compiled in accordance with national or international sustainability reporting frameworks.	The Bank's Sustainability Report is prepared in accordance with the sustainability reporting framework established by the Financial Services Authority, thus ensuring that information is presented transparently and in accordance with applicable regulatory standards.	Complied
Rekomendasi 6.2.4: **Recommendation 6.2.4:**	**Keterangan:** **Description:**	**Status:**
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.	Laporan Tahunan Bank disusun secara terintegrasi untuk menyajikan kinerja historis sekaligus memberikan gambaran mengenai risiko, peluang, serta prospek ke depan. Penyajian ini bertujuan mendukung Pemegang Saham dan pemangku kepentingan dalam memahami arah strategis Bank serta upaya yang ditempuh untuk menciptakan nilai berkelanjutan.	Terpenuhi
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.	The Bank's Annual Report is prepared in an integrated manner to present historical performance while providing an overview of risks, opportunities, and future prospects. This presentation aims to support Shareholders and stakeholders in understanding the Bank's strategic direction and the efforts undertaken to create sustainable value.	Complied

Rekomendasi 6.3: Diseminasi Informasi.
Recommendation 6.3: Dissemination of Information.

Rekomendasi 6.3.1: Recommendation 6.3.1:	Keterangan: Description:	Status:
Saluran penyebaran informasi harus menyediakan akses yang setara, tepat waktu, dan relatif murah untuk informasi yang relevan bagi pengguna.	Bank menyediakan beragam kanal komunikasi untuk memastikan seluruh Pemegang Saham dan pemangku kepentingan memperoleh informasi secara adil, tepat waktu, relevan, dan efisien. Akses informasi tersebut difasilitasi melalui situs web resmi, media sosial, *e-mail blast*, paparan publik, siaran pers, serta saluran komunikasi internal yang ditujukan khusus bagi karyawan.	Terpenuhi
Channels for disseminating Information should provide users with equal, timely, and relatively inexpensive access to relevant information.	The Bank provides various communication channels to ensure that all Shareholders and stakeholders receive information in a fair, timely, relevant, and efficient manner. Access to this information is facilitated through the official website, social media, email blasts, public exposes, press releases, and internal communication channels specifically for employees.	Complied
Rekomendasi 6.3.2: **Recommendation 6.3.2:**	**Keterangan:** **Description:**	**Status:**
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.	Saat ini pernyataan mengenai penerapan PUGKI belum dipublikasikan melalui situs web Bank, namun telah disajikan secara lengkap dalam Laporan Tahunan sebagai bentuk transparansi dan pemenuhan kewajiban pelaporan.	Penjelasan
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.	Currently, a statement regarding the implementation of PUGKI has not been published on the Bank's website, but it is presented in full in the Annual Report as a form of transparency and compliance with the reporting obligations.	Explanation

Rekomendasi 6.3.3: **Recommendation 6.3.3:**	**Keterangan:** **Description:**	**Status:**
Untuk korporasi yang terdaftar di pasar modal di yurisdiksi selain yurisdiksi asal, peraturan perundang-undangan atas governansi korporat yang berlaku harus di diungkapkan dengan jelas. Dalam hal *cross listing*, kriteria dan prosedur *cross listing*, kriteria dan prosedur untuk mengakui persyaratan *listing* untuk *listing* utama harus transparan dan didokumentasikan.	Bank adalah entitas usaha yang berdiri dan beroperasi di Indonesia dengan sepenuhnya mematuhi ketentuan hukum serta regulasi yang berlaku di yurisdiksi Indonesia.	Terpenuhi
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.	The Bank is a business entity established and operating in Indonesia and fully complies with applicable laws and regulations in Indonesian jurisdictions.	Complied

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:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki suatu kebijakan komunikasi yang memfasilitasi dan mendorong partisipasi Pemegang Saham atau investor.	Anggaran Dasar Bank memuat ketentuan mengenai kebijakan komunikasi dengan Pemegang Saham dan investor sebagai landasan dalam menjalin hubungan yang transparan dan akuntabel.	Terpenuhi
The corporation has a communication policy that facilitates and encourages shareholder or investor participation.	The Bank's Articles of Association contain provisions regarding communication policies with Shareholders and investors as the basis for establishing transparent and accountable relationships.	Complied
Rekomendasi 7.1.2: **Recommendation 7.1.2:**	**Keterangan:** **Description:**	**Status:**
Korporasi yang merupakan Entitas Induk memastikan bahwa kebijakan governansi korporatnya berlaku bagi Entitas Anak dan Entitas Sepengendali yang di dalamnya investasi korporasi adalah signifikan.	Bank menetapkan kebijakan komunikasi dengan Pemegang Saham dan investor yang tertuang dalam Anggaran Dasar sebagai pedoman dalam menjaga keterbukaan informasi. Pada saat yang sama, Bank tidak memiliki Entitas Anak maupun Entitas Sepengendali.	Penjelasan
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.	The Bank has established communication policy with Shareholders and investors, outlined in the Articles of Association as a guideline for maintaining information transparency. At the same time, the Bank has no Subsidiary or Entity under Common Control.	Explanation
Rekomendasi 7.1.3: **Recommendation 7.1.3:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki aturan dan prosedur yang mengatur akuisisi, pengambilalihan, 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.	Anggaran Dasar Bank menetapkan prosedur terkait akuisisi, pengambilalihan, serta transaksi material lainnya. Di dalamnya juga diatur secara rinci hak, wewenang, dan tanggung jawab Pemegang Saham. Informasi tersebut tersedia dan dapat diakses melalui situs web resmi Bank di www.victoriabank.co.id.	Terpenuhi
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.	The Bank's Articles of Association establish procedures related to acquisitions, takeovers, and other material transactions. They also detail the rights, authorities, and responsibilities of Shareholders. This information is available and accessible through the Bank's official website at www.victoriabank.co.id.	Complied

Rekomendasi 7.2: Perlakuan Adil Terhadap Pemegang Saham.
Recommendation 7.2: Fair Treatment to Shareholders.

Rekomendasi 7.2.1: **Recommendation 7.2.1:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki aturan dan prosedur yang memastikan: 1. Semua Pemegang Saham dari seri yang sama dalam 1 (satu) kelas saham harus diperlakukan setara. 2. Pengungkapan aturan dan prosedur tersebut serta pengungkapan struktur modal dan pengaturan yang memungkinkan Pemegang Saham tertentu memeroleh pengaruh atau kendali yang tidak proporsional dengan kepemilikan sahamnya.	Bank menjamin perlakuan yang setara bagi seluruh Pemegang Saham, baik mayoritas maupun minoritas, domestik maupun asing. Setiap informasi yang relevan disampaikan secara transparan melalui kanal yang mudah diakses, seperti situs web Bank, Bursa Efek Indonesia, dan KSEI, dengan penyajian dalam bahasa Indonesia dan bahasa Inggris.	Terpenuhi
Corporations have rules and procedures ensuring that: 1. All Shareholders of the same series in 1 (one) class of shares shall be treated equally. 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.	The Bank guarantees equal treatment for all Shareholders, including majority or minority, domestic or foreign. All relevant information is transparently communicated through easily accessible channels, such as the Bank's website, Indonesia Stock Exchange, and KSEI, presented in both Indonesian and English.	Complied
Rekomendasi 7.2.2: **Recommendation 7.2.2:**	**Keterangan:** **Description:**	**Status:**
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.	Bank berkomitmen menjalankan setiap transaksi dengan pihak berelasi secara transparan dan independen, tanpa menimbulkan benturan kepentingan. Melalui mekanisme pengawasan yang ketat, Bank memastikan kepentingan institusi dan Pemegang Saham tetap terlindungi, sekaligus menjaga kepatuhan terhadap ketentuan yang berlaku serta meminimalkan potensi risiko.	Terpenuhi
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.	The Bank is committed to conducting all transactions with related parties transparently and independently, without creating conflicts of interest. Through strict oversight mechanisms, the Bank ensures that the interests of the institution and its Shareholders are protected, while maintaining compliance with applicable regulations and minimizing potential risks.	Complied
Rekomendasi 7.2.3: **Recommendation 7.2.3:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki dan mengungkapkan kebijakan untuk mencegah terjadinya *insider trading*. 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.	Kode Etik Bank mengatur secara jelas mekanisme pencegahan praktik *insider trading* sebagai bagian dari upaya menjaga integritas dan keadilan dalam kegiatan usaha.	Terpenuhi
The corporation 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.	The Bank's Code of Conduct clearly regulates the prevention of insider trading practices as part of efforts to maintain integrity and fairness in business activities.	Complied

Rekomendasi 7.3: Rapat Umum Pemegang Saham.
Recommendation 7.3: General Meeting of Shareholders.

Rekomendasi 7.3.1: **Recommendation 7.3.1:**	**Keterangan:** **Description:**	**Status:**
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.	Bank menyampaikan panggilan RUPS secara tepat waktu sesuai ketentuan perundang-undangan, sekaligus memberikan kesempatan bagi Pemegang Saham untuk memperoleh klarifikasi atau informasi tambahan terkait agenda yang akan dibahas. Undangan RUPS dipublikasikan melalui sarana elektronik, termasuk situs web Bank, Bursa Efek Indonesia, dan KSEI.	Terpenuhi
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.	The Bank delivers summon for the GMS in a timely manner in accordance with laws and regulations, while also providing Shareholders with the opportunity to obtain clarification or additional information regarding the agenda. Invitation to the GMS is published electronically, including on the Bank's website, Indonesia Stock Exchange, and KSEI.	Complied

Rekomendasi 7.3.2: **Recommendation 7.3.2:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki dan mengungkapkan aturan dan prosedur yang memfasilitasi Pemegang Saham dalam berpartisipasi dan memberikan suara secara efektif di RUPS. The Corporation has and discloses rules and procedures that facilitate Shareholders to participate and vote effectively at the GMS.	Pada setiap penyelenggaraan RUPS, Bank menyampaikan tata tertib rapat yang memuat ketentuan serta fasilitas bagi Pemegang Saham, sehingga Pemegang Saham dapat berpartisipasi dan menyampaikan hak suaranya secara optimal. At each GMS, the Bank publishes meeting rules and procedures, which outline provisions and facilities for Shareholders, thus enabling them to participate and exercise their voting rights optimally.	Terpenuhi Complied
Rekomendasi 7.3.3: **Recommendation 7.3.3:**	**Keterangan:** **Description:**	**Status:**
Pemegang Saham berpartisipasi efektif dalam menetapkan penunjukan anggota Direksi dan Dewan Komisaris. Shareholders participate effectively to determine the appointment of members of the Board of Directors and Board of Commissioners.	Dalam RUPS yang membahas perubahan susunan pengurus, Bank memberikan ruang bagi Pemegang Saham untuk menyampaikan pertanyaan, memberikan tanggapan, serta menyalurkan hak suaranya. In GMS discussing changes to the management structure, the Bank provides a platform for Shareholders to raise questions, provide feedback, and cast their votes.	Terpenuhi Complied
Rekomendasi 7.3.4: **Recommendation 7.3.4:**	**Keterangan:** **Description:**	**Status:**
Korporasi memastikan transparansi dan akuntabilitas auditor eksternal di RUPS. The corporation ensures transparency and accountability of the external auditor at the GMS.	Pada RUPS dengan agenda penunjukan kantor akuntan publik dan/atau akuntan publik, Bank menyampaikan penjelasan mengenai pihak yang diusulkan guna memastikan transparansi dan memberikan dasar pertimbangan bagi Pemegang Saham dalam pengambilan keputusan. At GMS with the agenda of appointing public accounting firm and/or public accountant, the Bank provides an explanation of the proposed parties to ensure transparency and provide the basis for Shareholders' considerations in decision-making.	Terpenuhi Complied
Rekomendasi 7.3.5: **Recommendation 7.3.5:**	**Keterangan:** **Description:**	**Status:**
Penyampaian hasil pemungutan suara dan ringkasan risalah RUPS secara lengkap diumumkan ke publik pada hari kerja berikutnya. Submission of voting results and a complete summary of the GMS minutes are announced to the public on the following working day.	Hasil pemungutan suara beserta ringkasan risalah RUPS diumumkan kepada publik pada hari yang sama setelah rapat selesai, melalui situs web resmi Bank. The voting results, along with a summary of the GMS minutes, are announced to the public on the same day after the meeting is finished, through the Bank's official website.	Terpenuhi Complied
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:**	**Keterangan:** **Description:**	**Status:**
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. 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.	Bank menjelaskan secara rinci dalam Laporan Tahunan mengenai proses identifikasi dan pemilihan pemangku kepentingan utama yang dilibatkan dalam berbagai aktivitas. Untuk memperkuat keterlibatan tersebut, Bank menyediakan mekanisme WBS sebagai saluran yang aman dan independen bagi pemangku kepentingan dalam menyampaikan masukan, saran, maupun pengaduan. Langkah ini menjadi wujud komitmen Bank dalam menjaga transparansi, memperkuat partisipasi, serta memastikan penanganan isu-isu penting yang relevan bagi keberlanjutan operasional. The Bank explains the process of identifying and selecting key stakeholders involved in various activities in details in its Annual Report. To strengthen this engagement, the Bank provides a secure and independent channel for stakeholders to submit input, suggestions, and complaints. This step demonstrates the Bank's commitment to maintaining transparency, strengthening participation, and ensuring timely handling of critical issues relevant to operational sustainability.	Terpenuhi Complied

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:	Keterangan: Description:	Status:
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.	Direksi berkomitmen mengomunikasikan strategi, prioritas, serta sasaran keberlanjutan perusahaan secara jelas kepada seluruh pemangku kepentingan. Setiap pencapaian dan kinerja terhadap sasaran tersebut dilaporkan secara transparan melalui Laporan Tahunan, sehingga memberikan gambaran menyeluruh atas konsistensi Bank dalam mendukung agenda keberlanjutan. Melalui keterbukaan informasi ini, pemangku kepentingan dapat menilai secara lebih baik langkah konkret yang ditempuh Bank dalam mencapai tujuan keberlanjutan.	Terpenuhi
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 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.	The Board of Directors is committed to clearly communicating the Company's sustainability strategy, priorities, and targets to all stakeholders. Each achievement and performance towards these targets is transparently reported through the Annual Report, providing a comprehensive overview of the Bank's consistency in supporting the sustainability agenda. Through this information transparency, stakeholders can better assess the concrete steps taken by the Bank to achieve its sustainability goals.	Complied

Rekomendasi 8.3: Perlindungan Terhadap Pemangku Kepentingan.
Recommendation 8.3: Protection for Stakeholders.

Rekomendasi 8.3.1: Recommendation 8.3.1:	Keterangan: Description:	Status:
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.	Bank menetapkan sejumlah kebijakan sebagai acuan dalam menjalankan aktivitas usaha yang berlandaskan etika, tanggung jawab sosial, serta kepedulian terhadap lingkungan, sekaligus menjunjung tinggi hak-hak pemangku kepentingan. Seluruh kebijakan tersebut dipaparkan secara komprehensif dalam Laporan Tahunan Bank.	Terpenuhi
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 stakeholder rights.	The Bank has established several policies as a guideline for conducting business activities based on ethics, social responsibility, and environmental awareness, while upholding stakeholder rights. All of these policies are comprehensively presented in the Bank's Annual Report.	Complied
Rekomendasi 8.3.2: **Recommendation 8.3.2:**	**Keterangan:** **Description:**	**Status:**
Direksi mendorong karyawan bekerja untuk kepentingan jangka panjang korporasi dan mengedepankan keberlanjutan.	Bank menerapkan standar operasional prosedur terkait kebijakan insentif jangka panjang bagi karyawan sebagai bagian dari upaya mendorong terciptanya nilai berkelanjutan. Kebijakan tersebut diatur dalam Keputusan Direksi No. 005/SK-DIR/01/24 tanggal 8 Januari 2024 tentang Standar Operasional Prosedur *Human Capital Management*.	Terpenuhi
The Board of Directors encourages employees to work for the long-term interests of the corporation and prioritizes sustainability.	The Bank implements standard operating procedures related to long-term incentive policies for employees as an effort to encourage the creation of sustainable value. These policies are regulated in Board of Directors' Decision No. 005/SK-DIR/01/24 dated 8 January 2024 on Standard Operating Procedures for Human Capital Management.	Complied

Rencana Strategis Bank
Bank's Strategic Plans

Rencana strategis Bank disusun secara terintegrasi dan meliputi rencana korporasi sebagai arah strategis serta Rencana Bisnis Bank (RBB) sebagai penjabaran rencana operasional dan target usaha yang disusun secara selaras dan berkesinambungan.

The Bank's strategic plan is developed in an integrated manner and encompasses corporate plan as its strategic direction and the Bank Business Plan (RBB) as a detailed outline of the operational plan and business targets, developed in a harmonious and sustainable manner.

Rencana Korporasi

Rencana korporasi merupakan bagian integral dari rencana strategis Bank yang disusun sebagai pedoman arah pengembangan usaha dan kebijakan strategis Bank dalam jangka menengah dan panjang. Rencana korporasi mencerminkan visi, misi, dan sasaran strategis Bank, serta menjadi landasan dalam pengambilan keputusan korporasi yang berdampak signifikan terhadap keberlanjutan usaha Bank.

Penyusunan rencana korporasi dilakukan secara terstruktur dan selaras dengan prinsip kehati-hatian, penerapan GCG, serta ketentuan peraturan perundang-undangan yang berlaku. Rencana korporasi mencakup arah pengembangan bisnis, strategi penguatan permodalan, pengelolaan risiko utama, serta kebijakan strategis lainnya yang relevan dengan dinamika lingkungan usaha dan industri perbankan.

Rencana Korporasi ditetapkan oleh Direksi dan diawasi oleh Dewan Komisaris, serta diselaraskan dengan keputusan RUPS dalam hal terkait aksi korporasi strategis. Rencana Korporasi selanjutnya dijabarkan secara operasional dalam RBB, sehingga memastikan konsistensi antara arah strategis jangka panjang dan rencana usaha jangka pendek hingga menengah.

Pelaksanaan dan pencapaian rencana korporasi dievaluasi secara berkala dengan memperhatikan perkembangan kondisi internal dan eksternal Bank, serta menjadi dasar dalam penyesuaian strategi bisnis dan kebijakan manajemen risiko guna menjaga kesinambungan dan pertumbuhan usaha Bank secara berkelanjutan.

Corporate Plan

Corporate plan is an integral part of the Bank's strategic plan, prepared as a guideline for the Bank's medium- and long-term business development and strategic policies. Corporate plan reflects the Bank's vision, mission, and strategic objectives and serves as the basis for corporate decision-making that significantly impacts the Bank's business sustainability.

The corporate plan is structured and aligned with prudent principles, GCG implementation, and applicable laws and regulations. Corporate plan encompasses business development direction, capital strengthening strategies, key risk management, and other strategic policies relevant to the dynamics of business environment and banking industry.

Corporate Plan is established by the Board of Directors, overseen by the Board of Commissioners, and aligned with GMS resolutions regarding strategic corporate actions. The Corporate Plan is further operationally elaborated in RBB, thus ensuring consistency between long-term strategic direction and short- to medium-term business plans.

The implementation and achievement of the corporate plan are periodically evaluated, by considering developments in the Bank's internal and external conditions, and serve as the basis for adjusting business strategies and risk management policies to maintain the Bank's continuity and sustainable growth.

Rencana Bisnis Bank

Dalam rangka menjaga kesinambungan arah bisnis yang sejalan dengan visi dan misi, Dewan Komisaris bersama Direksi secara konsisten melakukan komunikasi intensif untuk menyelaraskan pandangan terhadap rencana strategis Bank. Seluruh rencana strategis tersebut dituangkan dalam RBB yang disusun sesuai ketentuan Peraturan Otoritas Jasa

The Bank's Business Plan

To maintain the continuity of business direction in line with vision and mission, the Board of Commissioners and Board of Directors consistently communicate intensively to align their views on the Bank's strategic plan. All strategic plans are outlined in RBB, prepared in accordance with Financial Services Authority Regulation

Keuangan No. 5/POJK.03/2016 tentang Rencana Bisnis Bank Umum. Penyusunan RBB tidak hanya memperhatikan kondisi eksternal dan internal, tetapi juga menekankan penerapan prinsip kehati-hatian, pengelolaan risiko yang efektif, serta kepatuhan pada asas perbankan yang sehat. Untuk periode RBB 2026-2028, Bank menetapkan tema *"Strengthening Digital Transformation for Sustainable Banking Growth"* yang menjadi landasan utama dalam arah pengembangan bisnis, dengan rincian sebagai berikut:

Rencana Jangka Panjang

Dalam periode 5 (lima) tahun mendatang, Bank menetapkan strategi usaha yang berorientasi pada pertumbuhan berkelanjutan dan peningkatan daya saing. Fokus strategi ini meliputi:

1. Senantiasa 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 optimalisasi melalui evaluasi kinerja jaringan kantor cabang guna meningkatkan efisiensi dan produktivitas dalam rangka mencapai pertumbuhan bisnis yang berkelanjutan.
4. Melanjutkan dan meningkatkan inovasi produk dan layanan terbaik yang fokus kepada nasabah (*customer-centric*).
5. Melanjutkan pengembangan sistem teknologi informasi untuk mendukung efisiensi, inovasi dan pengembangan produk serta peningkatan layanan.
6. Mengembangkan kualitas dan meningkatkan produktivitas sumber daya manusia dan pelayanan nasabah untuk menghadapi tantangan bisnis.
7. Meningkatkan nilai perusahaan bagi Pemegang Saham dan pemangku kepentingan.

Rencana Jangka Menengah dan Pendek

Dalam rangka menjaga kesinambungan kinerja, Bank menetapkan sasaran jangka pendek untuk periode 1 (satu) tahun serta sasaran jangka menengah untuk periode 3 (tiga) tahun. Target yang disusun meliputi:

1. Penguatan GCG dan penerapan manajemen risiko, meliputi:
    a. Melanjutkan peningkatan internalisasi budaya kepatuhan secara berkelanjutan di seluruh aspek operasional dan bisnis Bank.
    b. Memperkuat fungsi pengawasan dan pengendalian risiko pada *second* dan *third line of defense*.
    c. Mencapai pertumbuhan bisnis yang berkelanjutan melalui penerapan dan pengelolaan GCG.

No. 5/POJK.03/2016 on Business Plan for Commercial Banks. RBB is not only prepared by considering external and internal conditions but also emphasizes the application of prudent principles, effective risk management, and adherence to sound banking principles. For the 2026-2028 RBB period, the Bank establishes the theme "Strengthening Digital Transformation for Sustainable Banking Growth," which serves as the main basis for its business development, with the following details:

Long-Term Plan

In the next 5 (five) year period, the Bank will establish a business strategy oriented towards sustainable growth and increased competitiveness. The focus of this strategy includes:

1. Consistently maintaining and strengthening the implementation of GCG principles in line with risk management principles and regulatory compliance.
2. Maintaining and fostering capital at a strong and adequate level as a basis for prudent and sustainable development and growth of the Bank's business scale.
3. Continuing optimization through evaluating the performance of branch office network to increase its efficiency and productivity to achieve sustainable business growth.
4. Continuing and improving product innovation and best services that focus on customers (customer-centric).
5. Continuing the development of information technology systems to support efficiency, innovation and product development as well as service improvements.
6. Developing quality and increasing the productivity of human resources and customer service to face business challenges.
7. Increasing Company value for Shareholders and stakeholders.

Medium and Short-Term Plans

To maintain performance continuity, the Bank has established short-term targets for 1 (one) year and medium-term targets for 3 (three) years. The targets developed include:

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. Strengthening the supervision and risk control functions at the second and third lines of defense.
    c. Achieving sustainable business growth through the implementation and management of GCG.

2. Permodalan, yaitu dengan memperkuat dan/atau memelihara permodalan yang sehat guna menyerap risiko serta mendukung pertumbuhan bisnis berkelanjutan, melalui peningkatan laba (organik) dan penerbitan obligasi subordinasi.
3. Pengembangan bisnis, meliputi:
   a. Menerbitkan 15 (lima belas) produk dasar dan 12 (dua belas) produk lanjutan 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*.
   d. Meningkatkan efektivitas penanganan kredit bermasalah, kredit hapus buku, penyelesaian agunan yang diambilalih 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 TI dengan memperkuat kapasitas dan kualitas layanan infrastruktur TI yang bisa menjamin keamanan dan menjaga kepercayaan nasabah guna mendukung kegiatan operasional.
5. Jaringan kantor:
   a. Melanjutkan peningkatan evaluasi kinerja jaringan kantor cabang yang ada guna mencapai tingkat profitabilitas yang menguntungkan.
   b. Melakukan penambahan jaringan kantor untuk meningkatkan layanan nasabah serta memperluas pasar secara geografis dalam mendukung bisnis.
6. Sumber daya manusia dan organisasi:
   a. Meningkatkan kualitas sumber daya manusia serta penguatan perangkat organisasi melalui program *training* yang berkelanjutan dan rekrutmen tenaga sesuai kebutuhan bisnis Bank dan regulasi.
   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. Memastikan pertumbuhan dan peningkatan nilai Bank bagi seluruh Pemegang Saham dan pemangku kepentingan melalui strategi bisnis yang terukur dan berkelanjutan.

2. Capitalization, 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 15 (fifteen) basic products and 12 (twelve) advanced products to encourage sustainable business growth and customer-centric product development, while increasing fee-based income.
   b. Enhancing marketing campaigns to expand the deposit customer base, particularly small customers, to increase the portion of low-cost funds and reduce the cost of funds.
   c. Continuing collaborative initiatives in developing other fee-based income contributing businesses in wealth management products and services.
   d. Improving the effectiveness of handling non-performing loans, write-off loans, settlement of foreclosed assets, and utilization of unused fixed assets (abandoned properties) to maintain and improve quality, optimize asset productivity, and increase operating income other than interest.
4. IT systems by strengthening the capacity and quality of IT infrastructure services to ensure security and maintain customer trust to support operational activities.
5. Office network:
   a. Continuing to improve the performance evaluation of the existing branch office network to achieve a profitable level of profitability.
   b. Expanding office network to improve customer service and expand the market geographically to support business.
6. Human capital and organization:
   a. Improving the quality of human capital and strengthening the organizational tools through ongoing training programs and recruitment in accordance with the Bank's business needs and regulations.
   b. Improving the quality of human capital in a dynamic competitive environment through soft skills and hard skills development, recruitment programs (officer development programs), and planned training programs every 3 (three) months, integrated with mandatory certification and refresher courses.
7. Ensuring the growth and increase in the Bank's value for all Shareholders and stakeholders through measurable and sustainable business strategies.

Rencana Penanganan Permasalahan Keuangan dan/atau Penguatan Modal Bank

Dalam rangka menerapkan prinsip kehati-hatian dan menjaga kesinambungan usaha, Bank secara preventif menyusun rencana penanganan permasalahan keuangan dalam bentuk rencana aksi pemulihan (*recovery plan*), meskipun Bank berada dalam kondisi keuangan yang normal dan tidak berada dalam status pengawasan khusus. Rencana tersebut disiapkan sebagai langkah antisipatif untuk memastikan kesiapan Bank dalam menghadapi potensi tekanan yang dapat memengaruhi stabilitas keuangan.

Rencana aksi pemulihan disusun secara terintegrasi dengan proses *Internal Capital Adequacy Assessment Process* (ICAAP) dan RBB, dengan mempertimbangkan profil risiko, kecukupan permodalan, serta kondisi likuiditas Bank. Melalui keterkaitan tersebut, Bank memastikan bahwa strategi penguatan permodalan dan langkah pemulihan yang direncanakan selaras dengan arah pengembangan usaha dan kapasitas permodalan Bank.

Rencana aksi pemulihan telah memperoleh persetujuan Pemegang Saham melalui RUPS dan disampaikan kepada Otoritas Jasa Keuangan sesuai dengan ketentuan peraturan perundang-undangan mengenai penetapan status pengawasan dan penanganan permasalahan bank umum. Implementasi serta evaluasi atas rencana tersebut dilakukan secara berkala oleh Direksi dan diawasi oleh Dewan Komisaris guna memastikan efektivitasnya sebagai instrumen pencegahan dan kesiapan Bank dalam menjaga ketahanan permodalan dan likuiditas, serta pemenuhan ketentuan kehati-hatian yang berlaku.

Financial Problem Handling Plan and/or Bank Capital Strengthening

To implement prudent principles and maintain business continuity, the Bank prepares a preventive financial problem handling plan in form of recovery plan, even though the Bank is in a normal financial condition and not under special supervision status. This plan is prepared as an anticipatory measure to ensure the Bank's readiness to face potential pressures that could impact financial stability.

The recovery plan is developed in an integrated manner with the Internal Capital Adequacy Assessment Process (ICAAP) and RBB, by considering the Bank's risk profile, capital adequacy, and liquidity conditions. Through these relationships, the Bank ensures that its capital strengthening strategy and planned recovery measures are in line with the Bank's business development direction and capital capacity.

The recovery plan has received Shareholder approval through the GMS and has been submitted to the Financial Services Authority in accordance with laws and regulations on the determination of supervisory status and handling of commercial bank problems. The implementation and evaluation of this plan are carried out periodically by the Board of Directors and overseen by the Board of Commissioners to ensure its effectiveness as a preventative measure and the Bank's readiness to maintain capital and liquidity resilience, as well as compliance with applicable prudent regulations.

Pembelian Kembali Saham dan/atau Obligasi
Shares and/or Bonds Buy Back

Sepanjang tahun 2025, Bank tidak melaksanakan aksi korporasi berupa pembelian kembali saham maupun obligasi yang sebelumnya telah diterbitkan dan tercatat di Bursa Efek Indonesia.

Throughout 2025, the Bank did not carry out any corporate actions in form of share or bonds buy back previously issued and listed on Indonesia Stock Exchange.

Kebijakan Transaksi dengan Pihak yang Memiliki Hubungan Istimewa

Transaction Policy with Related Party

Bank memiliki dan menerapkan kebijakan serta prosedur transaksi dengan pihak yang memiliki hubungan istimewa sebagai bagian dari penerapan GCG dan upaya pencegahan serta penanganan benturan kepentingan. Kebijakan tersebut bertujuan untuk memastikan bahwa setiap transaksi dengan pihak yang memiliki hubungan istimewa dilaksanakan secara wajar (*arm's length principle*) dan tidak lebih menguntungkan dibandingkan dengan transaksi dengan pihak lain dalam kondisi yang serupa, serta senantiasa mengutamakan kepentingan terbaik Bank.

The Bank has and implements policy and procedures for transactions with related parties as part of its GCG implementation and efforts to prevent and handle conflicts of interest. This policy aims to ensure that every transaction with related parties is conducted on an arm's length principle and is not more advantageous than transactions with other parties under similar circumstances, while always prioritizing the Bank's best interests.

Pihak yang memiliki hubungan istimewa dengan Bank mencakup, antara lain pihak yang mengendalikan atau dikendalikan oleh Bank, Pemegang Saham Pengendali dan Pemegang Saham Mayoritas, perusahaan terafiliasi, anggota Direksi, Dewan Komisaris, Dewan Pengawas Syariah, Pejabat Eksekutif, serta pihak lain yang memiliki hubungan pengaruh atau hubungan keluarga sesuai dengan ketentuan peraturan perundang-undangan yang berlaku. Bank melakukan pengkajian dan pemutakhiran daftar pihak yang memiliki hubungan istimewa secara berkala.

Parties with special relationships with the Bank, include those controlling or controlled by the Bank, Controlling Shareholders and Majority Shareholders, affiliated companies, members of the Board of Directors, Board of Commissioners, Sharia Supervisory Board, Executive Officers, and other parties with influence or family relationships, in accordance with applicable laws and regulations. The Bank periodically reviews and updates the list of related parties.

Kebijakan dan prosedur tersebut mengatur cakupan transaksi dengan pihak yang memiliki hubungan istimewa secara luas, tidak terbatas pada transaksi kredit atau pembiayaan, namun juga mencakup berbagai bentuk eksposur dan transaksi lainnya, termasuk jasa, pembelian dan penjualan aset, sewa, perdagangan, pembentukan usaha patungan, serta transaksi keuangan lainnya. Setiap transaksi dilakukan melalui proses identifikasi, penilaian kewajaran, dan pengendalian risiko yang memadai.

These policy and procedures broadly regulate the scope of transactions with related parties, not limited to loan or financing transactions, but also encompass various forms of exposures and other transactions, including services, asset purchases and sales, lease, trade, joint ventures, and other financial transactions. Each transaction is conducted through a process of identification, fairness assessment, and adequate risk control.

Dalam rangka menjaga independensi dan objektivitas, anggota Direksi dan Dewan Komisaris yang memiliki kepentingan wajib mengungkapkan benturan kepentingan dan dikecualikan dari proses persetujuan maupun pengelolaan transaksi terkait. Transaksi dengan pihak yang memiliki hubungan istimewa serta penghapusan eksposur terkait dilaksanakan sesuai dengan kewenangan dan memperoleh persetujuan organ Bank yang berwenang. Direksi dan Dewan Komisaris melakukan pemantauan secara berkala atas transaksi dan eksposur kepada pihak yang memiliki hubungan istimewa, termasuk melalui mekanisme pelaporan dan penelaahan independen.

To maintain independence and objectivity, members of the Board of Directors and Board of Commissioners with interests are required to disclose conflicts of interest and are excluded from the approval process and management of related transactions. Transactions with related parties and elimination of related exposures are carried out in accordance with authority and obtain approval of the Bank's authorized organs. The Board of Directors and Board of Commissioners regularly monitor transactions and exposures to related parties, including through independent reporting and review mechanisms.

Bank juga menetapkan batasan eksposur terhadap pihak yang memiliki hubungan istimewa sesuai dengan kompleksitas dan profil risiko Bank, serta menerapkan mekanisme pelaporan atas setiap pengecualian kebijakan atau batasan yang ditetapkan, guna memastikan pengelolaan risiko dan pencegahan benturan kepentingan dilakukan secara efektif dan berkesinambungan.

The Bank also establishes limits on exposure to related parties in accordance with the Bank's complexity and risk profile, and implements reporting mechanism for any exceptions to established policies or limits, to ensure an effective and sustainable risk management and conflict of interest prevention.

Penyediaan Dana kepada Pihak terkait dan/atau Penyediaan Dana Besar

Provision of Funds to Related Parties and/or Provision of Large Exposure

Dalam menyalurkan dana kepada pihak terkait maupun debitur dengan eksposur besar, Bank senantiasa mematuhi ketentuan regulator, termasuk Peraturan Otoritas Jasa Keuangan No. 32/POJK.03/2018 tentang Batas Maksimum Pemberian Kredit dan Penyediaan Dana Besar bagi Bank Umum, serta pedoman internal yang berlaku. Sepanjang tahun 2025, realisasi penyediaan dana kepada pihak terkait maupun debitur inti non-terkait diungkapkan sebagai berikut:

In lending to related parties and debtors with significant exposures, the Bank consistently complies with regulatory requirements, including Financial Services Authority Regulation No. 32/POJK.03/2018 on the Legal Lending Limit and Large Exposure for Commercial Bank, as well as applicable internal guidelines. Throughout 2025, the realization of funds provided to related parties and non-related core debtors was disclosed as follows:

Penyediaan Dana Provision of Fund	Debitur Debtor	Total (Juta Rupiah / Million Rupiah)
Kepada Pihak Terkait To Related Parties	17	220,483
Kepada Debitur Inti:		
Individu Individual	-	-
Kelompok Group	65	10,890,922

Kepatuhan Perpajakan
Tax Compliance

Sebagai lembaga keuangan yang tunduk pada ketentuan hukum, Bank Victoria berkomitmen untuk melaksanakan kewajiban perpajakan secara disiplin dan transparan. Bank melaksanakan pemotongan dan pemungutan pajak atas setiap objek pajak sesuai peraturan yang berlaku, termasuk Pajak Penghasilan (PPh) karyawan serta Pajak Pertambahan Nilai (PPN). Selain itu, Bank menyampaikan Surat Pemberitahuan (SPT) baik bulanan maupun tahunan, beserta dokumen pendukung lainnya kepada otoritas terkait secara tepat waktu. Untuk mendukung akurasi dan kepatuhan, pelaporan dilakukan melalui sistem Direktorat Jenderal Pajak, sedangkan pencatatan administrasi dilakukan terintegrasi dengan sistem *core banking* Bank.

As a financial institution subject to legal provisions, Bank Victoria is committed to implementing its tax obligations in a disciplined and transparent manner. The Bank withholds and collects taxes on all taxable items in accordance with applicable regulations, including employee Income Tax (PPh) and Value Added Tax (VAT). Furthermore, the Bank submits monthly and annual Tax Returns (SPT), along with other supporting documents, to relevant authorities in a timely manner. To ensure accuracy and compliance, reporting is conducted through the system of the Directorate General of Taxes, while administrative records are integrated with the Bank's core banking system.

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 memiliki kebijakan serta prosedur yang dirancang untuk memastikan keterbukaan informasi, baik terkait kondisi keuangan maupun non-keuangan. Kebijakan ini disusun dengan mengacu pada ketentuan berikut:

1. Peraturan Otoritas Jasa Keuangan No. 18 Tahun 2025 tentang Transparansi dan Publikasi Laporan Bank.
2. Peraturan Otoritas Jasa Keuangan No. 29/POJK.04/2016 tentang Laporan Tahunan Emiten atau Perusahaan Publik.
3. Peraturan Otoritas Jasa Keuangan No. 14/POJK.04/2022 tentang Penyampaian Laporan Keuangan Berkala Emiten atau Perusahaan Publik.
4. Surat Edaran Otoritas Jasa Keuangan No. 16/SEOJK.04/2021 tentang Bentuk dan Isi Laporan Tahunan Emiten atau Perusahaan Publik.
5. Peraturan Otoritas Jasa Keuangan No. 13/POJK.03/2021 tentang Penyelenggaraan Produk Bank Umum.
6. Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2023 tentang Pelindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan.

The Bank has policies and procedures designed to ensure transparency of information, both regarding financial and non-financial conditions. This policies are prepared by referring to the following provisions:

1. Financial Services Authority Regulation No. 18 of 2025 on Transparency and Publication of Bank Reports.
2. Financial Services Authority Regulation No. 29/POJK.04/2016 on Annual Report of Issuers or Public Companies.
3. Financial Services Authority Regulation No. 14/POJK.04/2022 on Submission of Periodic Financial Statements of Issuers or Public Companies.
4. Financial Services Authority Circular No. 16/SEOJK.04/2021 on the Form and Content of Annual Reports of Issuers or Public Companies.
5. Financial Services Authority Regulation No. 13/POJK.03/2021 on Implementation of Commercial Bank Products.
6. Financial Services Authority Regulation No. 22 of 2023 on Consumer and Public Protection in Financial Services Sector.

7. Peraturan Otoritas Jasa Keuangan No. 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik.
8. Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2025 tentang Pelaporan Bank Umum melalui Sistem Pelaporan Otoritas Jasa Keuangan.
9. Peraturan Otoritas Jasa Keuangan No. 15 Tahun 2024 tentang Integritas Pelaporan Keuangan Bank.

Bank menyampaikan informasi keuangan maupun non-keuangan secara terbuka dan mudah diakses oleh seluruh pemangku kepentingan. Penyampaian informasi dilakukan melalui berbagai media, baik dalam bentuk laporan cetak maupun publikasi digital pada situs resmi Bank. Bentuk laporan yang disajikan meliputi Laporan Tahunan, Laporan Keuangan Publikasi Triwulanan, serta Laporan Keuangan Publikasi Bulanan, yang seluruhnya disusun untuk mendukung prinsip transparansi dan akuntabilitas.

7. Financial Services Authority Regulation No. 51/POJK.03/2017 on Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies.
8. Financial Services Authority Regulation No. 22 of 2025 on Reporting of Commercial Banks through the Financial Services Authority Reporting System.
9. Financial Services Authority Regulation No. 15 of 2024 on Integrity of Financial Reporting of the Bank.

The Bank presents financial and non-financial information openly and easily accessible to all stakeholders. Information is delivered through various media, both in printed reports and digital publications on the Bank's official website. The reports presented include Annual Report, Quarterly Published Financial Statements, and Monthly Published Financial Statements, all of which are prepared to support the principles of transparency and accountability.

Informasi Lain terkait Tata Kelola Bank

Other Information related to Bank Governance

Sepanjang tahun 2025, Bank senantiasa menegakkan prinsip profesionalisme dan transparansi dalam setiap aktivitas usaha. Bank memastikan tidak adanya campur tangan dari Pemegang Saham maupun pihak eksternal, serta menjaga harmonisasi internal dengan mengelola kebijakan remunerasi secara hati-hati agar tidak menimbulkan potensi konflik. Seluruh kegiatan operasional dijalankan dengan berpedoman pada prinsip GCG, Kode Etik, Peraturan Perusahaan, serta ketentuan hukum yang berlaku, sehingga keputusan dan langkah bisnis yang diambil tetap terkendali serta meminimalkan potensi risiko yang merugikan.

Throughout 2025, the Bank consistently upheld the principles of professionalism and transparency in all business activities. The Bank ensures that there is no interference from Shareholders or external parties and maintains internal harmony by carefully managing remuneration policies to avoid potential conflicts. All operational activities are conducted in accordance with GCG principles, Code of Conduct, Company Regulations, and applicable legal provisions, thus ensuring that business decisions and actions remain under control and potential adverse risks are minimized.

Pernyataan dan Praktik *Bad Corporate Governance*

Statement and Practices of Bad Corporate Governance

Sepanjang tahun 2025, Bank senantiasa memastikan kepatuhan terhadap seluruh regulasi dan ketentuan yang berlaku dalam penerapan tata kelola perusahaan. Dalam periode tersebut, Bank tidak menemukan adanya praktik yang bertentangan dengan prinsip GCG maupun tindakan yang berpotensi mengganggu kualitas penerapannya. Hal ini tercermin pada data yang ditampilkan dalam tabel berikut:

Throughout 2025, the Bank consistently ensured compliance with all applicable regulations and provisions regarding the implementation of corporate governance. In that period, the Bank did not find any practices that were contrary to GCG principles or actions that could potentially compromise the quality of its implementation. This is reflected in the data presented in the following table:

Uraian Description	Praktik Practice
Adanya laporan sebagai Bank yang mencemari lingkungan. There is a report that the Bank pollutes the environment.	Nihil None
Perkara penting yang sedang dihadapi oleh Bank, anggota Direksi dan/atau anggota Dewan Komisaris yang sedang menjabat tidak diungkapkan dalam Laporan Tahunan. Significant cases currently faced by the Bank, members of Board of Directors, and/or members of Board of Commissioners are not disclosed in the Annual Report.	Nihil None
Ketidakpatuhan dalam pemenuhan kewajiban perpajakan. Non-compliance in fulfilling tax obligations.	Nihil None
Ketidaksesuaian penyajian Laporan Tahunan dan Laporan Keuangan dengan peraturan yang berlaku dan Standar akuntansi Keuangan. Inconsistency of presentation of Annual Report and Financial Statements with the the applicable regulations and Financial Accounting Standards.	Nihil None
Kasus terkait buruh dan karyawan. Cases related to workers and employees.	Nihil None
Tidak terdapat pengungkapan segmen operasi. There are no disclosures on operational segment.	Nihil None
Terdapat ketidaksesuaian antara Laporan Tahunan *hardcopy* dengan Laporan Tahunan *softcopy*. There is inconsistency between Annual Report's hard copy and Annual Report's softcopy.	Nihil None