



Bank *Sahabat*
Sampoerna

Tata Kelola Perusahaan

Corporate Governance

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Komitmen Bank terhadap Penerapan Tata Kelola Perusahaan

Bank's Commitment to the Implementation of Corporate Governance

Bank Sahabat Sampoerna percaya bahwa penerapan Tata Kelola Perusahaan yang Baik atau *Good Corporate Governance (GCG)* dapat mendorong terciptanya persaingan yang sehat dan iklim usaha yang kondusif. Mengingat pentingnya penerapan GCG, Bank berkomitmen untuk senantiasa menjalankan praktik tata kelola yang baik pada seluruh kegiatan bisnis yang dijalankan sebagai unsur penting dalam menunjang pertumbuhan dan stabilitas kinerja usaha yang berkesinambungan.

Penerapan GCG di lingkungan Bank juga berfokus pada kepatuhan terhadap peraturan yang berlaku, peningkatan tanggung jawab organ internal Bank, dan pembentukan mekanisme kerja yang terintegrasi. Bank percaya bahwa penerapan hal-hal tersebut mampu memastikan seluruh proses bisnis yang dijalankan dapat memberikan nilai tambah bagi pemangku kepentingan. Hal ini juga diarahkan untuk memperlakukan Pemegang Saham dan pihak lain secara adil serta mengurangi risiko pelanggaran yang dapat merugikan reputasi Bank.

Bank Sahabat Sampoerna believes that the implementation of Good Corporate Governance (GCG) can encourage the creation of healthy competition and a conducive business climate. Given the importance of implementing GCG, the Bank is committed to always implementing good governance practices in all of its business activities as an important element in supporting sustainable growth and stability of business performance.

The implementation of GCG in the Bank also focuses on compliance with applicable regulations, increasing the responsibility of the Bank's internal organs, and establishing an integrated work mechanism. The Bank believes that the implementation of these things can ensure that all of the Bank's business processes can provide added value to stakeholders. This is also directed at treating Shareholders and other parties fairly and reducing the risk of violations that can harm the Bank's reputation.

Landasan Hukum Penerapan Tata Kelola Perusahaan

Legal Basis of Implementation of Corporate Governance

Penerapan Tata Kelola Perusahaan (GCG) di Bank Sahabat Sampoerna berlandaskan pada berbagai peraturan yang telah dikeluarkan oleh pemerintah dan regulator, diantaranya sebagai berikut.

1. Undang-Undang Dasar Negara Republik Indonesia Tahun 1945.
2. Undang-Undang Republik Indonesia No. 40 Tahun 2007 tentang Perseroan Terbatas sebagaimana telah diubah dengan Peraturan Pemerintah Pengganti Undang-Undang No. 2 Tahun 2022 tentang Cipta Kerja sebagaimana telah ditetapkan menjadi Undang-Undang berdasarkan Undang-Undang No. 6 Tahun 2023 tentang Penetapan Peraturan Pemerintah Pengganti Undang-Undang No. 2 Tahun 2022 tentang Cipta Kerja menjadi Undang-Undang.
3. Undang-Undang Republik Indonesia No. 10 tahun 1998 tentang perubahan atas Undang-undang No. 7 tahun 1992 tentang Perbankan sebagaimana telah diubah dengan Undang-undang No. 4 Tahun 2023 tentang Pengembangan dan Penguatan Sektor Keuangan ("UU P2SK").

The implementation of Good Corporate Governance (GCG) at Bank Sahabat Sampoerna is based on various regulations issued by the government and regulators as follows.

1. *The 1945 Constitution of the Republic of Indonesia.*
2. *Law of the Republic of Indonesia No. 40 of 2007 on Limited Liability Companies as amended by Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation as stipulated into Law by Law No. 6 of 2023 on the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation into Law.*
3. *Law of the Republic of Indonesia No. 10 of 1998 on the amendment of Law No. 7 of 1992 on Banking as amended by Law No. 4 of 2023 on Financial Sector Development and Strengthening ("P2SK Law").*

4. Peraturan Bank Indonesia Nomor 23/ 11 /PBI/2021 Tentang Standar Nasional Sistem Pembayaran perubahan atas Peraturan Bank Indonesia Nomor 22/23/ PBI/2020 Tahun 2020 tentang Sistem Pembayaran
 5. Peraturan Bank Indonesia No. 3 tahun 2023 tentang Perlindungan Konsumen Bank Indonesia.
 6. Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021 tentang Bank Umum.
 7. Surat Edaran Otoritas Jasa Keuangan No. 17/ SEOJK.07/2018 tentang Pedoman Pelaksanaan Layanan Pengaduan Konsumen di Sektor Jasa Keuangan.
 8. Peraturan Otoritas Jasa Keuangan Nomor 22 Tahun 2023 Tentang Pelindungan Konsumen Dan Masyarakat Di Sektor Jasa Keuangan Perubahan Atas Peraturan Otoritas Jasa Keuangan Nomor 18/POJK.07/2018 tentang Layanan Pengaduan Konsumen di Sektor Jasa Keuangan.
 9. Peraturan Otoritas Jasa Keuangan (POJK) Nomor 30 Tahun 2024 tentang Konglomerasi Keuangan dan Perusahaan Induk Konglomerasi Keuangan Perubahan Atas Peraturan Otoritas Jasa Keuangan Nomor 45/POJK.03/2020 Tahun 2020 tentang Konglomerasi Keuangan
 10. Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2014 tentang Penerapan Tata Kelola Terintegrasi Bagi Konglomerasi Keuangan dan Surat Edaran Otoritas Jasa Keuangan No. 15/SEOJK.03/2015 tentang Penerapan Tata Kelola Terintegrasi bagi Konglomerasi Keuangan.
 11. Peraturan Otoritas Jasa Keuangan Nomor 30 Tahun 2024 Tentang Konglomerasi Keuangan Dan Perusahaan Induk Konglomerasi Keuangan Perubahan atas Peraturan Otoritas Jasa Keuangan Nomor 17/ POJK.03/2014 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan
 12. Peraturan Otoritas Jasa Keuangan Nomor 13 Tahun 2024 Tentang Transparansi Dan Publikasi Suku Bunga Dasar Kredit Bagi Bank Umum Konvensional perubahan atas Peraturan Otoritas Jasa Keuangan No. 37/POJK.03/2019 tentang Transparansi dan Publikasi Laporan Bank.
 13. Peraturan Otoritas Jasa Keuangan Republik Indonesia Nomor 27 Tahun 2022 Tentang Perubahan Kedua Atas Peraturan Otoritas Jasa Keuangan Nomor 11/ POJK.03/2016 Tentang Kewajiban Penyediaan Modal Minimum Bank Umum.
 14. Peraturan Otoritas Jasa Keuangan Nomor 34 / POJK.03/2016 Tentang Perubahan Atas Peraturan Otoritas Jasa Keuangan Nomor 11/POJK.03/2016 Tentang Kewajiban Penyediaan Modal Minimum Bank Umum
 15. Peraturan Otoritas Jasa Keuangan Nomor 17 Tahun 2023 tentang Penerapan Tata Kelola Bagi Bank Umum perubahan atas Peraturan Otoritas Jasa Keuangan No. 45/POJK.03/2015 dan Surat Edaran Otoritas Jasa Keuangan No. 40/SEOJK.03/2016 perihal Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum.
 16. Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit.
4. *Bank Indonesia Regulation No. 23/ 11 /PBI/2021 on National Standard of Payment System amendment to Bank Indonesia Regulation No. 22/23/PBI/2020 of 2020 on Payment System.*
 5. *Bank Indonesia Regulation No. 3 of 2023 concerning Consumer Protection of Bank Indonesia.*
 6. *Financial Services Authority Regulation No. 12/ POJK.03/2021 concerning Commercial Banks.*
 7. *Circular Letter of the Financial Services Authority No. 17/SEOJK.07/2018 concerning Guidelines for the Implementation of Consumer Complaint Services in the Financial Services Sector.*
 8. *Financial Services Authority Regulation No. 22 of 2023 on Consumer and Community Protection in the Financial Services Sector Amendment to Financial Services Authority Regulation No. 18/POJK.07/2018 on Consumer Complaint Services in the Financial Services Sector.*
 9. *Financial Services Authority Regulation (POJK) No. 30 of 2024 on Financial Conglomerates and Financial Conglomerate Holding Companies Amendment to Financial Services Authority Regulation No. 45/ POJK.03/2020 of 2020 on Financial Conglomerates*
 10. *Financial Services Authority Regulation No. 18/ POJK.03/2014 on the Implementation of Integrated Governance for Financial Conglomerates and Financial Services Authority Circular Letter No. 15/SEOJK.03/2015 on the Implementation of Integrated Governance for Financial Conglomerates.*
 11. *Financial Services Authority Regulation No. 30 of 2024 on Financial Conglomerates and Parent Company of Financial Conglomerates Amendment to Financial Services Authority Regulation No. 17/POJK.03/2014 on the Implementation of Integrated Risk Management for Financial Conglomerates.*
 12. *Financial Services Authority Regulation No. 13 of 2024 on Transparency and Publication of Basic Lending Interest Rates for Conventional Commercial Banks amendment to Financial Services Authority Regulation No. 37/POJK.03/2019 on Transparency and Publication of Bank Reports.*
 13. *Regulation of the Financial Services Authority of the Republic of Indonesia Number 27 of 2022 concerning the Second Amendment to the Financial Services Authority Regulation Number 11/POJK.03/2016 concerning the Minimum Capital Adequacy Requirements of Commercial Banks.*
 14. *Financial Services Authority Regulation Number 34 / POJK.03/2016 Regarding Amendments to Financial Services Authority Regulation Number 11/POJK.03/2016 Regarding the Minimum Capital Adequacy Requirements of Commercial Banks.*
 15. *Financial Services Authority Regulation No. 17 of 2023 regarding the Implementation of Governance for Commercial Banks amendments to Financial Services Authority Regulation No. 45/POJK.03/2015 and Financial Services Authority Circular Letter No. 40/SEOJK.03/2016 regarding the Implementation of Governance in Providing Remuneration for Commercial Banks.*
 16. *Financial Services Authority Regulation No. 55/ POJK.04/2015 regarding the Establishment and Implementation Guidelines for the Audit Committee.*

17. Peraturan Otoritas Jasa Keuangan No. 56/POJK.04/2015 tentang Pembentukan dan Pedoman Penyusunan Piagam Unit Audit Internal.
18. Peraturan Otoritas Jasa Keuangan Nomor 04/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum.
19. Peraturan Otoritas Jasa Keuangan No. 05/POJK.03/2016 dan Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2021 tentang Rencana Bisnis Bank Umum.
20. Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2016 tentang Pembukaan Jaringan Kantor Bank Umum berdasarkan Modal Inti
21. Peraturan Otoritas Jasa Keuangan Republik Indonesia Nomor 12 /POJK.03/2021 Tentang Bank Umum perubahan atas Peraturan Otoritas Jasa Keuangan Nomor 17/POJK.03/2018 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan Nomor 6/POJK.03/2016 tentang Kegiatan Usaha dan Jaringan Kantor Berdasarkan Modal Inti Bank
22. Peraturan Otoritas Jasa Keuangan No. 9/POJK.03/2016 tentang Prinsip Kehati-hatian Bank Umum yang Melakukan Penyerahan sebagian Pelaksanaan Kerja kepada Pihak Lain
23. Surat Edaran Otoritas Jasa Keuangan Nomor 11 /SEOJK.03/2017 Tentang Prinsip Kehati-Hatian Bagi Bank Umum Yang Melakukan Penyerahan Sebagian Pelaksanaan Pekerjaan Kepada Pihak Lain
24. Peraturan Otoritas Jasa Keuangan No. 13/POJK.03/2021 tentang Penyelenggaraan Produk Bank Umum perubahan atas Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko Bagi Bank Umum
25. Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum
26. Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum.
27. Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 dan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola Bagi Bank Umum
28. Peraturan Otoritas Jasa Keuangan No. 56/POJK.03/2016 tentang Kepemilikan Saham Bank Umum.
29. Peraturan Otoritas Jasa Keuangan Republik Indonesia Nomor 11 Tahun 2024 Tentang Perubahan Kedua Atas Peraturan Otoritas Jasa Keuangan Nomor 18/POJK.03/2017 Tentang Pelaporan Dan Permintaan Informasi Debitur Melalui Sistem Layanan Informasi Keuangan
30. Surat Edaran Otoritas Jasa Keuangan No. 39/SEOJK.03/2016 tentang Penilaian Kemampuan dan Kepatuhan bagi Calon Pemegang Saham Pengendali, Calon Anggota Direksi, dan Calon Anggota Komisaris Bank.
31. Surat Edaran Otoritas Jasa Keuangan No. 41/SEOJK.03/2016 tentang Tata Cara Penerbitan Sertifikat Deposito.
17. *Financial Services Authority Regulation No. 56/POJK.04/2015 regarding the Establishment and Guidelines for the Preparation of Internal Audit Unit Charter.*
18. *Financial Services Authority Regulation No. 04/POJK.03/2016 concerning Assessment of Commercial Bank Soundness Level.*
19. *Financial Services Authority Regulation No. 05/POJK.03/2016 and Financial Services Authority Circular Letter No. 12/SEOJK.03/2021 regarding Commercial Bank Business Plans.*
20. *Circular Letter of the Financial Services Authority No. 14/SEOJK.03/2016 regarding the Opening of Commercial Bank Office Networks based on Tier 1 Capital.*
21. *Regulation of the Financial Services Authority of the Republic of Indonesia Number 12/POJK.03/2021 concerning Commercial Banks, amendment to the Financial Services Authority Regulation Number 17/POJK.03/2018 concerning Amendments to the Financial Services Authority Regulation Number 6/POJK.03/2016 concerning Business Activities and Office Networks Based on Tier 1 Capital.*
22. *Financial Services Authority Regulation No. 9/POJK.03/2016 concerning Prudential Principles of Commercial Banks that Transfer part of the Work Implementation to Other Parties*
23. *Circular Letter of the Financial Services Authority No. 11 /SEOJK.03/2017 on Prudential Principles of Commercial Banks.*
24. *Financial Services Authority Regulation No. 13/POJK.03/2021 regarding the Implementation of Commercial Bank Products amendment to Financial Services Authority Regulation No. 18/POJK.03/2016 regarding the Implementation of Risk Management for Commercial Banks*
25. *Circular Letter of the Financial Services Authority No. 34/SEOJK.03/2016 concerning the Implementation of Risk Management for Commercial Banks*
26. *Financial Services Authority Regulation No. 11/POJK.03/2022 regarding the Implementation of Information Technology by Commercial Banks.*
27. *Financial Services Authority Regulation No. 17 of 2023 and Financial Services Authority Circular Letter No. 13/SEOJK.03/2017 on the Implementation of Governance for Commercial Banks.*
28. *Financial Services Authority Regulation No. 56/POJK.03/2016 concerning Share Ownership of Commercial Banks.*
29. *Regulation of the Financial Services Authority of the Republic of Indonesia Number 11 of 2024 concerning the Second Amendment to the Regulation of the Financial Services Authority Number 18/POJK.03/2017 concerning Reporting and Requests for Debtor Information Through the Financial Information Service System.*
30. *Circular Letter of the Financial Services Authority No. 39/SEOJK.03/2016 concerning Capability and Compliance Assessment for Prospective Controlling Shareholders, Prospective Members of the Board of Directors, and Prospective Members of the Board of Commissioners of Banks.*
31. *Circular Letter of the Financial Services Authority No. 41/SEOJK.03/2016 regarding Procedures for Issuing Certificates of Deposit.*

32. Surat Edaran Otoritas Jasa Keuangan No. 20/SEOJK.03/2016 tentang Fitur Konversi Menjadi Saham Biasa atau Write Down terhadap Instrumen Modal Inti Tambahan dan Modal Pelengkap.
33. Surat Edaran Otoritas Jasa Keuangan Nomor 6/SEOJK.03/2020 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Operasional dengan Menggunakan Pendekatan Standar bagi Bank Umum perubahan atas Surat Edaran Otoritas Jasa Keuangan No. 24/SEOJK.03/2016 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Operasional dengan Menggunakan Pendekatan Indikator Standar
34. Surat Edaran Otoritas Jasa Keuangan No. 26/SEOJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum sesuai Profil Risiko dan Pemenuhan Capital Equivalency Maintained Asset
35. Surat Edaran Otoritas Jasa Keuangan No. 27/SEOJK.03/2016 tentang Kegiatan Usaha Bank Umum berdasarkan Modal Inti
36. Surat Edaran Otoritas Jasa Keuangan Nomor 23 /SEOJK.03/2022 Tentang Perhitungan Aset Tertimbang Menurut Risiko Untuk Risiko Pasar Bagi Bank Umum perubahan atas Surat Edaran Otoritas Jasa Keuangan No. 38/SEOJK.03/2016 tentang Pedoman Penggunaan Metode Standar dalam Perhitungan Kewajiban Penyediaan Modal Minimum Bank Umum dengan Memperhitungkan Risiko Pasar.
37. Surat Edaran Otoritas Jasa Keuangan No. 18/SEOJK.03/2023 tentang Tata Cara Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan.
38. Peraturan Otoritas Jasa Keuangan Nomor 9 Tahun 2023 tentang Penggunaan Jasa Akuntan Publik dan kantor Akuntan Publik dalam Kegiatan Jasa Keuangan
39. Peraturan Anggota Dewan Gubernur Nomor 5 Tahun 2024 Tentang Perubahan Atas Peraturan Anggota Dewan Gubernur Nomor 21/12/PADG/2019 Tentang Penyelenggaraan Transfer Dana Dan Kliring Berjadwal Oleh Bank Indonesia
40. Peraturan Bank Indonesia Nomor 23/14/PBI/2021 Tahun 2021 tentang Perubahan Kelima Atas Peraturan Bank Indonesia Nomor 17/18/PBI/2015 Tentang Penyelenggaraan Transaksi, Penatausahaan Surat Berharga, Dan Setelmen Dana Seketika
41. Peraturan Bank Indonesia No. 21/10/PBI/2019 tanggal 30 Agustus 2019 tentang Pengelolaan Uang Rupiah.
42. Peraturan Bank Indonesia No. 23/2/PBI/2021 tentang Perubahan Ketiga atas Peraturan Bank Indonesia No. 20/8/PBI/2018 tentang Rasio Loan to Value untuk Kredit Properti, Rasio Financing to Value untuk Pembiayaan Properti, dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor.
43. Peraturan Bank Indonesia No. 23/6/PBI/2021 tentang Penyedia Jasa Pembayaran.
44. Peraturan Otoritas Jasa Keuangan No.46/POJK.03/2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum.
32. *Circular Letter of the Financial Services Authority No. 20/SEOJK.03/2016 on the Features of Conversion into Ordinary Shares or Write Down of Additional Tier 1 Capital and Supplementary Capital Instruments.*
33. *Circular Letter of the Financial Services Authority No. 6/SEOJK.03/2020 regarding Calculation of Risk-Weighted Assets for Operational Risk Using the Standardized Approach for Commercial Banks amendment to Circular Letter of the Financial Services Authority No. 24/SEOJK.03/2016 regarding Calculation of Risk-Weighted Assets for Operational Risk Using the Standardized Indicator Approach.*
34. *Circular Letter of the Financial Services Authority No. 26/SEOJK.03/2016 regarding Minimum Capital Adequacy according to Risk Profile and Fulfillment of Capital Equivalency Maintained Asset*
35. *Circular Letter of the Financial Services Authority No. 27/SEOJK.03/2016 regarding Commercial Bank Business Activities based on Tier 1 Capital*
36. *Circular Letter of the Financial Services Authority No. 23 /SEOJK.03/2022 concerning Calculation of Risk-Weighted Assets for Market Risk for Commercial Banks amendments to Circular Letter of the Financial Services Authority No. 38/SEOJK.03/2016 concerning Guidelines for the Use of Standard Methods in Calculating the Minimum Capital Adequacy Requirements of Commercial Banks by Taking into Account Market Risk.*
37. *Circular Letter of the Financial Services Authority No. 18/SEOJK.03/2023 regarding Procedures for the Use of Public Accountant Services and Public Accounting Firm in Financial Services Activities.*
38. *Financial Services Authority Regulation Number 9 of 2023 on the Use of Public Accountant Services and Public Accountant offices in Financial Services Activities*
39. *Regulation of Members of the Board of Governors Number 5 of 2024 concerning Amendments to Regulation of Members of the Board of Governors Number 21/12/PADG/2019 concerning the Implementation of Fund Transfers and Scheduled Clearing by Bank Indonesia*
40. *Bank Indonesia Regulation Number 23/14/PBI/2021 of 2021 concerning the Fifth Amendment to Bank Indonesia Regulation Number 17/18/PBI/2015 concerning the Implementation of Transactions, Administration of Securities, and Settlement of Instant Funds*
41. *Bank Indonesia Regulation No. 21/10/PBI/2019 dated August 30, 2019 concerning Rupiah Money Management.*
42. *Bank Indonesia Regulation No. 23/2/PBI/2021 on the Third Amendment to Bank Indonesia Regulation No. 20/8/PBI/2018 on Loan to Value Ratio for Property Loans, Financing to Value Ratio for Property Financing, and Down Payment for Motor Vehicle Loans or Financing.*
43. *Bank Indonesia Regulation No. 23/6/PBI/2021 regarding Payment Service Providers.*
44. *Financial Services Authority Regulation No.46/POJK.03/2017 regarding Implementation of Compliance Function of Commercial Banks.*

Penerapan Prinsip Tata Kelola Perusahaan

Bank Sahabat Sampoerna senantiasa menerapkan prinsip-prinsip dasar GCG di setiap kegiatan operasionalnya yang berlandaskan pada nilai dasar TARIF (Transparansi, Akuntabilitas, Responsibilitas, Independensi, dan Fairness). Masing-masing prinsip tersebut dijelaskan sebagai berikut:

Implementation of Corporate Governance Principles

Bank Sahabat Sampoerna always applies the basic principles of GCG in all its operational activities based on the basic values of TARIF (Transparency, Accountability, Responsibility, Independence, and Fairness). Each of these principles is explained as follows:

Prinsip-prinsip GCG GCG Principles	Penjelasan Description
Transparansi Transparency	Menyediakan informasi yang material, tepat waktu, relevan, akurat, dan jelas, serta dapat diakses oleh para pemangku kepentingan melalui situs web Bank (www.banksampoerna.com). <i>Providing material, timely, relevant, accurate, and clear information that can be accessed by stakeholders through the Bank's website (www.banksampoerna.com).</i>
Akuntabilitas Accountability	Menetapkan fungsi, tugas, dan tanggung jawab seluruh komponen organisasi Bank dengan berlandaskan pada Visi, Misi, dan Tujuan Bank serta Sampoerna Way. <i>Determining functions, duties, and responsibilities of all components of the Bank's organization based on the Vision, Missions, and Objectives of the Bank, and Sampoerna Way.</i>
Tanggung Jawab Responsibility	Mematuhi peraturan perundang-undangan yang berlaku, berpegang pada prinsip kehati-hatian, pengelolaan Bank yang sehat, dan melaksanakan tanggung jawab sosial perusahaan. <i>Complying with applicable laws and regulations, adhering to prudential principles, managing bank soundness, and implementing corporate social responsibility.</i>
Independensi Independency	Meminimalkan terjadinya benturan kepentingan dalam pengambilan keputusan. <i>Minimizing conflicts of interest in decision making.</i>
Kewajaran dan Kesetaraan Fairness and Equality	Memastikan perlakuan yang setara dan adil dalam memenuhi hak para pemangku kepentingan. <i>Assuring equal and fair treatment in meeting stakeholders' rights.</i>

Struktur dan Kerangka Tata Kelola Perusahaan

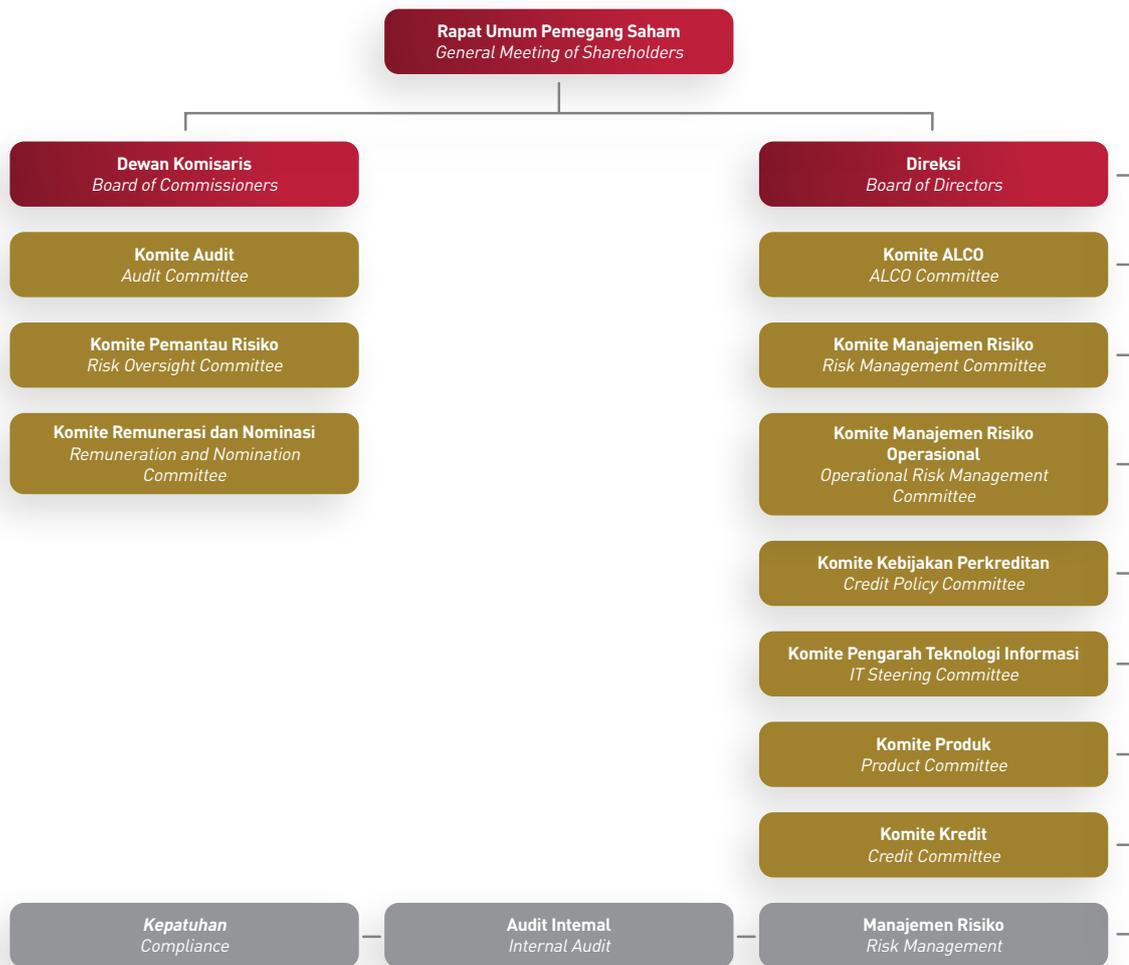
Structure and Framework of Good Corporate Governance

Struktur Tata Kelola Perusahaan

Berdasarkan Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas, struktur tata kelola perusahaan secara garis besar terdiri dari 3 (tiga) organ utama, yaitu Rapat Umum Pemegang Saham (RUPS), Dewan Komisaris dan Direksi. Di samping itu, Dewan Komisaris dan Direksi juga dapat dibantu oleh Organ Pendukung dalam menjalankan fungsinya. Adapun struktur tata kelola Bank Sahabat Sampoerna adalah sebagai berikut:

Corporate Governance Structure

Based on Law No. 40 of 2007 concerning Limited Liability Companies, the corporate governance structure broadly consists of 3 (three) main organs, namely the General Meeting of Shareholders (GMS), the Board of Commissioners and the Board of Directors. In addition, the Board of Commissioners and the Board of Directors can also be assisted by Supporting Organs in carrying out their functions. The governance structure of Bank Sahabat Sampoerna is as follows:



Mekanisme Tata Kelola Perusahaan

Mekanisme GCG di lingkungan Bank senantiasa mengacu pada peraturan perundang-undangan dan regulator yang berlaku. Mekanisme ini bertujuan untuk menjelaskan hubungan antar organ Bank agar selaras dengan fungsi dan tugas yang telah ditetapkan. Adapun organ Bank Sahabat Sampoerna, terdiri dari:

1. Rapat Umum Pemegang Saham (RUPS)

Organ tertinggi Bank yang dapat menentukan keputusan signifikan terhadap perusahaan. RUPS diselenggarakan oleh Dewan Komisaris dan Direksi, namun keputusan hasil rapat ditentukan oleh Pemegang Saham;

2. Dewan Komisaris

Organ yang bertindak atas nama Pemegang Saham, mempunyai tugas untuk memantau dan mengawasi kinerja Direksi dalam mengelola Bank;

Mechanism of Corporate Governance

The Bank has established a Corporate Governance (GCG) mechanism that refers to the applicable laws and regulations. The purpose of this mechanism is to clarify the relationship between the Bank's organs, aligning them with their defined functions and tasks. The organs of Bank Sahabat Sampoerna consist of:

1. General Meeting of Shareholders (GMS)

The highest organ of the Bank that can make significant decisions about the company. The GMS is held by the Board of Commissioners and Board of Directors, but the meeting resolutions are adopted by the Shareholders;

2. Board of Commissioners

The organ acting on behalf of Shareholders with duty to monitor and oversee the Board of Directors' performance in managing the Bank;

3. Direksi

Organ yang mempunyai tanggung penuh dalam operasional Bank, seperti membentuk strategi usaha, meningkatkan produktivitas dan profesionalisme karyawan, mengelola karyawan, melaporkan kinerja Bank secara keseluruhan kepada Pemegang Saham, dan lainnya;

4. Organ Pendukung Dewan Komisaris

Organ yang bertugas membantu Dewan Komisaris dalam melaksanakan tugas dan tanggung jawabnya, terdiri dari Komite Audit, Komite Nominasi dan Remunerasi, serta Komite Pemantau Risiko; dan

5. Organ Pendukung Direksi

Organ yang bertugas membantu Direksi dalam melaksanakan seluruh fungsi operasional, terdiri dari Komite Manajemen Risiko, Komite Kebijakan Perkreditan, ALCO, Komite Pengarah Teknologi Informasi, Komite Manajemen Risiko Operasional, Komite Produk, dan Komite Kredit.

3. Board of Directors

The organ having full responsibility for Bank operations, such as establishing business strategies, increasing employee productivity and professionalism, managing employees, reporting overall Bank performance to Shareholders, and others;

4. Board of Commissioners' Supporting Organs

organs with duty to assist the Board of Commissioners in performing duties and responsibilities, consisting of the Audit Committee, the Nomination and Remuneration Committee, and the Risk Oversight Committee; and

5. Board of Directors' Supporting Organs

organs with duty to assist the Board of Directors in performing all operational functions, consisting of the Risk Management Committee, the Credit Policy Committee, the ALCO, the Information Technology Steering Committee, the Operational Risk Management Committee, the Product Committee, and the Credit Committee.

Kebijakan Tata Kelola Perusahaan

Bank Sahabat Sampoerna telah memiliki sejumlah kebijakan tata kelola yang bertujuan agar penerapan GCG di lingkungan Bank dapat berjalan secara sistematis dan konsisten. Kebijakan tersebut berlaku bagi seluruh organ Bank tanpa terkecuali, serta dievaluasi secara berkala untuk menyesuaikan dengan perkembangan bisnis terkini. Kebijakan Tata Kelola Perusahaan (GCG) Bank, terdiri dari:

1. Kebijakan Umum Tata Kelola Perusahaan (GCG), merupakan kebijakan umum/payung kebijakan internal dalam penerapan Tata Kelola Perusahaan (GCG);
2. Kebijakan Umum Kepatuhan;
3. Kebijakan Umum Manajemen Risiko dan Pengendalian Internal;
4. Kebijakan Umum Manajemen Risiko Teknologi Informasi;
5. Kode Etik Karyawan (*Code of Conduct*), merupakan dokumen formal yang mengikat seluruh karyawan untuk berperilaku profesional, bertanggung jawab, dan patut, baik dalam melakukan hubungan bisnis dengan para nasabah, rekan, maupun hubungan dengan sesama rekan kerja;
6. Pedoman dan Tata Tertib Kerja, Dewan Komisaris, Direksi, dan komite yang membantu Dewan Komisaris; dan
7. Kebijakan dan Prosedur Operasi Standar (*Standard Operating Procedure/SOP*), Bank lainnya yang mengatur seluruh aktivitas bisnis, operasional, maupun penunjang bisnis.

Corporate Governance Policies

In order to implement systematic and consistent Corporate Governance (GCG), the Bank has established a Corporate Governance Policy. This policy applies to all organs of the Bank without exception and is regularly evaluated to align with the latest business developments. The Bank's Corporate Governance Policy consists of:

1. *GCG General Policy, an internal policy umbrella/general policy in implementing GCG;*
2. *Compliance General Policies;*
3. *Risk Management and Internal Control General Policies;*
4. *Information Technology Risk Management General Policies;*
5. *Code of Conduct, is a formal document binding all employees to behave professionally, responsibly, and properly, in maintaining business relationship with customers, business partners, and fellow colleagues;*
6. *Manual and Charter of Board of Commissioners, Board of Directors, and Committees assisting Board of Commissioners; and*
7. *Standard Operating Procedures (SOP) and Other Bank Policies, that govern the whole business activities, operational, and business support.*

Pengembangan Kualitas Tata Kelola Perusahaan

Good Corporate Governance Quality Development

Fokus Penerapan Tata Kelola Perusahaan Bank Sahabat Sampoerna 2024

Bank Sahabat Sampoerna senantiasa berupaya melakukan perbaikan dan penyempurnaan terhadap implementasi GCG dengan mengukur atau melakukan penilaian (*assessment*) terhadap hasil tata kelola di Bank. Hasil tata kelola merupakan keluaran hasil dari penerapan struktur dan proses tata kelola, baik dari aspek hasil kinerja maupun praktik-praktik yang digunakan untuk mencapai hasil kinerja tersebut.

Di tahun 2024, Bank melanjutkan fokus penerapan Tata Kelola Perusahaan (GCG) yang telah dilaksanakan pada tahun sebelumnya, yaitu:

1. Menjunjung tinggi integritas, keadilan, transparansi, dan budaya kepatuhan;
2. Melakukan perbaikan dan pengembangan proses, metode, infrastruktur, serta kualitas manajemen risiko sesuai dengan perkembangan bisnis;
3. Melakukan sinergi yang berkesinambungan antara *first line of defense*, *second line of defense*, dan *third line of defense*;
4. Memperbaiki proses, melakukan pengikinan sistem dan prosedur, meningkatkan kompetensi sumber daya manusia, serta meningkatkan proses quality assurance untuk beberapa aktivitas utama; dan
5. Mengembangkan struktur organisasi di Divisi Bisnis maupun Divisi Supporting, disesuaikan dengan pertumbuhan bisnis dan risiko yang dihadapi Bank.

Penilaian Penerapan Tata Kelola Perusahaan

Bank melakukan penilaian penerapan GCG secara mandiri (*self-assessment*) oleh pihak internal minimal 2 (dua) kali dalam 1 tahun buku terhadap kecukupan pelaksanaan GCG dan menyusun laporan pelaksanaannya. Penilaian tersebut menyertakan Dewan Komisaris, Direksi, Pejabat Eksekutif, dan seluruh divisi terkait yang dimiliki oleh Bank. *Self-assessment* ini diharapkan dapat membantu Bank mendapatkan peringkat terkait pelaksanaan tata kelola yang kemudian menjadi komponen penentu Tingkat Kesehatan Bank, sesuai dengan Peraturan Otoritas Jasa Keuangan No. 4/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum dan SEOJK No. 14/SEOJK.03/2017 tentang Penilaian Tingkat Kesehatan Bank Umum.

Focus of Corporate Governance Implementation at Bank Sahabat Sampoerna in 2024

Bank Sahabat Sampoerna always strives to make improvements and refinements to the implementation of GCG by measuring or assessing the results of governance in the Bank. Governance results are the output of the implementation of governance structures and processes, both in terms of performance results and practices used to achieve these performance results.

In 2023, the Bank continued its focus on the implementation of Corporate Governance (GCG) that had been carried out in the previous year, which includes:

1. *Upholding integrity, fairness, transparency, and compliance culture;*
2. *Improving and developing process, method, infrastructure, and quality of risk management in accordance with the business development;*
3. *Building continuous synergy between the first line of defense, the second line of defense, and the third line of defense;*
4. *Improving process, updating system and procedure, enhancing human resource competence, and improving quality assurance process for several main activities; and*
5. *Developing organization structure in the Business Division and Supporting Division, adjusted to the business growth and risks faced by the Bank.*

Assessment of Corporate Governance Implementation

The evaluation of the implementation of Corporate Governance (GCG) at Bank Sahabat Sampoerna is conducted using the self-assessment method at least twice in a financial year. This evaluation involves the Board of Commissioners, the Board of Directors, Executive Officers, and all relevant divisions of the Bank. Through this self-assessment, the Bank will obtain a rating related to the implementation of corporate governance, which serves as a determining component of the Risk Bank Based Rating, in accordance with Financial Services Authority Regulation No. 4/POJK.03/2016 concerning Assessment of Commercial Bank Soundness Level and SEOJK No. 14/SEOJK.03/2017 concerning Assessment of Commercial Bank Soundness Level.

Dasar Pelaksanaan Self-Assessment

Pelaksanaan *self-assessment* Tata Kelola Perusahaan (GCG) Bank dilakukan berpedoman pada Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 dan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 perihal Penerapan Tata Kelola bagi Bank Umum. Adapun proses penilaian ini dilaksanakan setiap semesteran untuk posisi akhir Juni dan Desember.

Tujuan Pelaksanaan Self-Assessment

Pelaksanaan penilaian mandiri (*self-assessment*) atas penerapan GCG di lingkungan Bank bertujuan untuk:

1. Menilai kecukupan struktur dan infrastruktur tata kelola Bank agar proses pelaksanaan prinsip GCG menghasilkan *outcome* yang sesuai dengan harapan pemangku kepentingan. Struktur tata kelola terdiri dari Dewan Komisaris, Direksi, Komite, dan Satuan Kerja pada Bank, sedangkan infrastruktur tata kelola Bank, antara lain kebijakan dan prosedur Bank, sistem informasi manajemen, serta tugas pokok dan fungsi masing-masing struktur organisasi.
2. Menilai efektivitas proses pelaksanaan prinsip GCG yang didukung kecukupan struktur dan infrastruktur tata kelola Bank sehingga menghasilkan *outcome* yang sesuai dengan harapan pemangku kepentingan.
3. Menilai kualitas *outcome* sesuai harapan pemangku kepentingan yang merupakan hasil proses pelaksanaan prinsip GCG, didukung kecukupan struktur dan infrastruktur tata kelola Bank.

Kriteria yang Digunakan dalam Self-Assessment

Kriteria dalam pelaksanaan *self-assessment* GCG Bank Sahabat Sampoerna meliputi 3 (tiga) aspek utama, yakni *governance structure*, *governance process*, dan *governance outcome*. Ketiga aspek tersebut ditetapkan berdasarkan atas pertimbangan 16 aspek penilaian penerapan GCG, 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.

The Basis of Self-Assessment Implementation

The execution of the *self-assessment* for Corporate Governance (GCG) at the Bank is guided by Financial Services Authority Regulation No. 17 of 2023 and Financial Services Authority Circular No. 13/SEOJK.03/2017 on Corporate Governance Implementation for Commercial Banks. This assessment process is carried out on a semi-annual basis for the end of June and December positions.

Objectives of Self-Assessment

The Bank carries out a *self-assessment* of Corporate Governance (GCG) with the following objectives.

1. Assessing the adequacy of the Bank's governance structure and infrastructure so that the implementation process of GCG principles will produce an outcome in line with the stakeholders' expectations. The governance structure consists of Board of Commissioners, Board of Directors, Committees, and Working Unit at the Bank, while the Bank's governance infrastructure includes Bank policies and procedures, management information system, as well as the main duties and functions of each organization structure.
2. Assessing the effectiveness of implementation process of GCG principles, which is supported by adequate Bank's governance structure and infrastructure in order to produce outcomes that meet stakeholders' expectations.
3. Assessing the quality of outcomes whether they are in line with stakeholder expectations, which is the result of the process of implementing GCG principles, supported by adequate Bank's governance structure and infrastructure.

Criteria Used in Self-Assessment

The criteria used in the Bank's Corporate Governance (GCG) *self-assessment* include 3 (three) aspects, namely *governance structure*, *governance process*, and *governance outcome*, based on the following 16 assessment aspects of the Corporate Governance (GCG) implementation.

1. Implementation of duties and responsibilities of the Board of Directors.
2. Implementation of duties and responsibilities of the Board of Commissioners.
3. Completeness and implementation of Committees' duties.
4. Managing conflict of interest.

5. Penerapan fungsi kepatuhan.
6. Penerapan fungsi audit intern.
7. Penerapan fungsi audit ekstern.
8. Penerapan fungsi manajemen risiko, termasuk sistem pengendalian internal.
9. Pemberian remunerasi.
10. Penyediaan dana kepada pihak terkait dan penyediaan dana besar.
11. Integritas pelaporan dan sistem teknologi informasi.
12. Rencana strategis Bank.
13. Aspek Pemegang Saham.
14. Penerapan strategi *anti-fraud*, termasuk anti penyuapan.
15. Penerapan keuangan berkelanjutan.
16. Penerapan tata kelola dalam kelompok usaha Bank.

Pihak Pelaksana *Self-Assessment*

Satuan Kerja Kepatuhan bersama dengan divisi terkait bertugas untuk melakukan proses *self-assessment* penerapan tata kelola di lingkungan Bank. Divisi terkait bertanggung jawab dalam proses pengisian kuesioner maupun penyiapan dokumen pendukung (*underlying documents*), kemudian dilakukan analisa penerapan kepatuhannya oleh Satuan Kerja Kepatuhan. Penilaian ini juga melibatkan Dewan Komisaris, Direksi, Pejabat Eksekutif, serta divisi-divisi/unit kerja yang berkaitan dengan penerapan GCG.

Hasil *Self-Assessment*

Hasil *self-assessment* penerapan GCG di Bank Sahabat Sampoerna dalam 3 (tiga) tahun terakhir dapat dilihat sebagai berikut:

Aspek <i>Aspects</i>	Nilai Score		
	2024	2023	2022
Pelaksanaan Tugas dan Tanggung Jawab Direksi <i>Implementation of duties and responsibilities of the Board of Directors</i>	1	2	1
Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris <i>Implementation of duties and responsibilities of the Board of Commissioners</i>	1	2	1
Kelengkapan dan Pelaksanaan Tugas Komite <i>Completeness and implementation of Committees' duties</i>	2	2	1
Penanganan Benturan Kepentingan <i>Managing conflict of interest</i>	1	1	1
Penerapan Fungsi Kepatuhan Bank <i>Implementation of Bank's compliance function</i>	2	1	2
Penerapan Fungsi Audit Intern <i>Implementation of internal audit function</i>	1	1	1
Penerapan Fungsi Audit Ekstern <i>Implementation of internal audit function</i>	1	1	1
Penerapan Fungsi Manajemen Risiko, termasuk Pengendalian Internal <i>Implementation of risk management function, including internal control system</i>	2	2	2

5. *Implementation of compliance function.*
6. *Implementation of internal audit function.*
7. *Implementation of external audit function.*
8. *Implementation of risk management function, including internal control system.*
9. *Provision of remuneration.*
10. *Provision of funds to related party and provision of large exposure.*
11. *Integrity of reporting and information technology systems.*
12. *The Bank's strategic plan.*
13. *Shareholder Aspect.*
14. *Implementation of anti-fraud strategies, including anti-bribery.*
15. *Implementation of sustainable finance.*
16. *Implementation of corporate governance within the Bank's business group.*

Parties Implementing Self-Assessment

The process of self-assessment is part of the duties of the Compliance Division and its related divisions. The relevant divisions are responsible for the process of filling out the questionnaire and preparing supporting documents (underlying documents), to then analyzing the compliance implementation by the Compliance Division. This assessment also involves the Board of Commissioners, Board of Directors, Executive Officers, as well as divisions/units related to the implementation of Corporate Governance (GCG).

Self-Assessment Results

Information regarding the Bank's Corporate Governance (GCG) self-assessment for the last 3 years is as follows.

Aspek <i>Aspects</i>	Nilai <i>Score</i>		
	2024	2023	2022
Pemberian Remunerasi <i>Provision of remuneration</i>	1	1	-
Penyediaan Dana kepada Pihak Terkait dan Penyediaan Dana Besar <i>Provision of funds to related party and provision of large exposure</i>	2	1	2
Integritas Pelaporan dan Sistem Teknologi Informasi <i>Integrity of reporting and information technology systems</i>	1	1	-
Rencana Strategis Bank <i>The Bank's strategic plan</i>	2	2	2
Aspek Pemegang Saham <i>Shareholder Aspect</i>	1	2	-
Penerapan Strategi <i>Anti-Fraud</i> , termasuk Anti Penyyuapan <i>Implementation of anti-fraud strategies, including anti-bribery</i>	2	1	-
Penerapan Keuangan Berkelanjutan <i>Implementation of sustainable finance</i>	1	2	-
Penerapan Tata Kelola dalam Kelompok Usaha Bank <i>Implementation of corporate governance within the Bank's business group</i>	1	1	-
PERINGKAT KOMPOSIT COMPOSITE RANKING	2	2	2

Berdasarkan hasil *self-assessment* pada tahun 2024, penerapan GCG Bank Sahabat Sampoerna memperoleh peringkat komposit 2 atau “Baik” dengan analisis sebagai berikut:

Based on the self-assessment results in 2024, Bank Sahabat Sampoerna's GCG implementation received a composite rating of 2 or "Good" with the following analysis:

Hasil Penilaian Sendiri (Self-Assessment) Pelaksanaan Tata Kelola Perusahaan *Self-Assessment Results for the Implementation of Corporate Governance*

Indikator <i>Indicators</i>	Peringkat <i>Rank</i>	Definisi Peringkat <i>Rank Definition</i>
Individual	2	Mencerminkan Manajemen Bank telah melakukan penerapan tata kelola yang secara umum Baik. Hal ini tercermin dari pemenuhan yang telah memadai atas prinsip-prinsip tata kelola. Walaupun masih terdapat kelemahan dalam penerapan prinsip tata kelola, namun demikian secara umum kelemahan tersebut kurang signifikan dan dapat diselesaikan dengan tindakan normal oleh Manajemen Bank. <i>Reflecting that the Bank Management has implemented good governance in general. This is reflected in the adequate fulfillment of governance principles. Although there are still weaknesses in the implementation of governance principles, in general these weaknesses are not significant and can be resolved with normal actions by the Bank Management.</i>
Konsolidasian <i>Consolidated</i>	-	Bank tidak melakukan <i>self-assessment</i> GCG konsolidasi karena tidak memiliki Entitas Anak. <i>The Bank did not conduct a consolidated GCG self-assessment because it does not have any Subsidiaries.</i>

Analisis Analysis

Kunci utama yang dijalankan dalam rangka mencapai tata kelola Bank pada peringkat 2:

1. Pemilik tidak melakukan intervensi terhadap penetapan komposisi dan/atau pelaksanaan tugas Dewan Komisaris yang berdampak pada berkurangnya keuntungan Bank dan/atau menyebabkan kerugian Bank. Pemilik mampu dan memiliki kapasitas keuangan untuk mengatasi kondisi permodalan bank yang memburuk atau permodalan Bank yang kurang dari jumlah yang ditetapkan;
2. Direksi bertanggung jawab penuh atas pelaksanaan kepengurusan Bank, Direksi melaksanakan tugas dan tanggung jawabnya sesuai dengan rencana yang dituangkan di dalam RBB;
3. Direksi melaksanakan prinsip Tata Kelola yang baik dalam setiap kegiatan usaha Bank. Seluruh anggota Direksi mempunyai komitmen yang tinggi dalam mendorong budaya kepatuhan, budaya risiko, serta semangat belajar di setiap jenjang organisasi;
4. Direksi melaksanakan tugas, wewenang, dan tanggung jawab dengan itikad baik dan dengan prinsip kehati-hatian;
5. Direksi senantiasa melaporkan pencapaian kinerja keuangan bulanan (*unaudited*) kepada pemegang saham, tidak ada intervensi pemegang saham dalam pelaksanaan tugas dan tanggung jawab Direksi;
6. Direksi independen terhadap Pemegang Saham pengendali dan tidak ada hubungan keterkaitan satu sama lain diantara anggota Direksi. Keseluruhan anggota Direksi tidak memiliki rangkap jabatan sebagai Komisaris, Direksi atau Pejabat Eksekutif pada Bank, perusahaan dan atau lembaga lain;
7. Seluruh anggota Direksi memiliki integritas yang teruji, kompetensi yang memadai dan reputasi keuangan yang baik dan memiliki kemauan dan kemampuan dalam meningkatkan pengetahuan terkait bidang perbankan dan keuangan/bidang lainnya untuk mendukung pelaksanaan tugas dan tanggung jawabnya;
8. Direksi tidak memanfaatkan Bank untuk kepentingan pribadi, keluarga, dan/atau pihak lain yang merugikan atau mengurangi keuntungan Bank dan tidak mengambil dan/atau menerima keuntungan pribadi dari Bank selain Remunerasi dan fasilitas lainnya yang ditetapkan RUPS;
9. Direksi telah menetapkan kebijakan dan keputusan strategis melalui mekanisme rapat Direksi. Pengambilan keputusan Direksi senantiasa dilakukan berdasarkan musyawarah mufakat berdasarkan pedoman dan tata tertib kerja yang mengikat dan menjadi tanggung jawab seluruh anggota Direksi. Jika terjadi perbedaan pendapat (*dissenting opinion*) dicantumkan secara jelas dalam risalah rapat beserta alasan perbedaannya. Keputusan dan kebijakan strategis yang dilakukan Direksi telah memperhatikan pengawasan sesuai tugas dan tanggung jawab Dewan Komisaris;
10. Direksi mengkomunikasikan Rencana Bisnis Bank (*Business Plan*) dan Rencana Korporasi (*Corporate Plan*) beserta realisasinya kepada Pemegang Saham, selain itu Direksi juga melakukan monitoring atas progres pemenuhan komitmen serta kepatuhan terhadap ketentuan Regulator dan mengungkapkan hal-hal yang bersifat strategis kepada pegawai khususnya terkait dengan kebijakan Bank di bidang kepegawaian;
11. Direksi tidak memberikan kuasa kepada pihak lain yang berakibat adanya pengalihan wewenang, tugas dan tanggung jawabnya dan tidak memiliki penasihat perorangan atau jasa profesional sebagai tenaga ahli atau konsultan dalam pelaksanaan tugas dan tanggung jawabnya;
12. Untuk membantu dan mendukung pelaksanaan tugas dan tanggung jawabnya, Direksi membentuk Komite Kebijakan Perkreditan (KKP), Komite Kredit, Komite Manajemen Risiko (KMR), Komite Manajemen Risiko Operasional (KMRO), Komite Pengarah Teknologi Informasi, Komite Manajemen Aset dan Kewajiban atau assets and liabilities management committee (ALCO) dan Komite Produk;
13. Seluruh anggota Dewan Komisaris memiliki integritas, kompetensi dan reputasi keuangan yang memadai. Anggota Dewan Komisaris tidak saling memiliki hubungan keluarga sampai dengan derajat kedua dengan sesama anggota Dewan Komisaris dan/atau Direksi;

The main key implemented in order to achieve Bank governance at rank 2:

1. *The owner does not intervene in the determination of the composition and/or implementation of the duties of the Board of Commissioners which has an impact on reducing the Bank's profits and/or causing losses to the Bank. The owner is capable and has the financial capacity to overcome the worsening condition of the bank's capital or the Bank's capital which is less than the amount stipulated;*
2. *The Board of Directors is fully responsible for the implementation of the Bank's management, the Board of Directors carries out its duties and responsibilities in accordance with the plan stated in the RBB;*
3. *The Board of Directors implements the principles of Good Governance in every business activity of the Bank. All members of the Board of Directors have a high commitment in encouraging a culture of compliance, a culture of risk, and a spirit of learning at every level of the organization;*
4. *The Board of Directors carries out its duties, authorities, and responsibilities in good faith and with the principle of prudence;*
5. *The Board of Directors always reports the achievement of monthly financial performance (unaudited) to shareholders, there was no intervention from shareholders in the implementation of the duties and responsibilities of the Board of Directors;*
6. *The Board of Directors is independent of the Controlling Shareholder and there is no interconnected relationship between members of the Board of Directors. All members of the Board of Directors do not hold concurrent positions as Commissioners, Directors or Executive Officers at the Bank, other companies and/or institutions;*
7. *All members of the Board of Directors have proven their integrity, adequate competence and good financial reputation and have the will and ability to improve knowledge related to banking and finance/other fields to support the implementation of their duties and responsibilities;*
8. *The Board of Directors does not use the Bank for personal, family and/or other party interests that are detrimental to or reduce the Bank's profits and does not take and/or receive personal benefits from the Bank other than Remuneration and other facilities determined by the GMS;*
9. *The Board of Directors has determined strategic policies and decisions through the Board of Directors meeting mechanism. The Board of Directors' decision-making is always carried out based on consensus based on guidelines and work procedures that are binding and are the responsibility of all members of the Board of Directors. If there is a dissenting opinion, it is clearly stated in the minutes of the meeting along with the reasons for the difference. Strategic decisions and policies made by the Board of Directors have taken into account supervision in accordance with the duties and responsibilities of the Board of Commissioners;*
10. *The Board of Directors communicates the Bank's Business Plan and Corporate Plan along with its realization to Shareholders, in addition the Board of Directors also monitors the progress of fulfilling commitments and compliance with Regulatory provisions and discloses strategic matters to employees, especially related to the Bank's policies in the field of personnel;*
11. *The Board of Directors does not grant power to other parties that result in the transfer of authority, duties and responsibilities and does not have individual advisors or professional services as experts or consultants in carrying out its duties and responsibilities;*
12. *To assist and support the implementation of its duties and responsibilities, the Board of Directors forms a Credit Policy Committee (KKP), Credit Committee, Risk Management Committee (KMR), Operational Risk Management Committee (KMRO), Information Technology Steering Committee, Asset and Liability Management Committee (ALCO) and Product Committee;*
13. *All members of the Board of Commissioners have integrity, competence and adequate financial reputation. Members of the Board of Commissioners do not have family relationships up to the second degree with fellow members of the Board of Commissioners and/or the Board of Directors;*

Analysis
Analysis

<p>14. Dewan Komisaris telah melaksanakan kewenangannya berdasarkan tugas dan wewenang yang diatur dalam Anggaran Dasar Bank dan aktif melaksanakan pengawasan terhadap seluruh kegiatan bank secara profesional dan independen. Pengawasan pelaksanaan tugas dan tanggung jawab Direksi dilakukan melalui rapat rutin bulanan. Dalam setiap rapat dengan Direksi, Dewan Komisaris selalu meminta Direksi memastikan pelaksanaan prinsip-prinsip Tata Kelola Bank dengan baik;</p> <p>15. Dewan Komisaris secara aktif telah melakukan pengawasan terhadap pelaksanaan pengelolaan aset bermasalah termasuk tindakan penyelamatan kredit serta pembentukan pencadangan yang cukup, melalui proses identifikasi dan verifikasi terhadap eksposur yang ada;</p> <p>16. Dewan Komisaris telah membentuk Komite Pemantau Risiko, Komite Audit serta Komite Remunerasi dan Nominasi dengan jumlah, komposisi, kompetensi serta perangkapan jabatan anggota Komite sesuai ketentuan yang berlaku tanpa intervensi dari pemilik. Komite telah melakukan tugasnya secara efektif dan memberikan laporan kepada Dewan Komisaris;</p> <p>17. Seluruh anggota komite Dewan Komisaris memiliki integritas, independen, kompetensi dan reputasi keuangan yang memadai serta akhlak dan moral yang baik. Keputusan rapat/rekomendasi Komite dilakukan secara musyawarah dan mufakat, disamping itu dilakukan melalui sirkuler memo yang disetujui oleh seluruh anggota Komite;</p> <p>18. Anggota Direksi, anggota Dewan Komisaris, anggota Komite Bank, Pejabat Eksekutif dan pegawai Bank tidak memanfaatkan Bank untuk kepentingan pribadi, keluarga, dan/atau pihak lain yang merugikan atau mengurangi keuntungan Bank;</p> <p>19. Dalam rangka menjaga dan memantau agar kegiatan usaha Bank tidak menyimpang dari ketentuan perundangan, seluruh kebijakan, prosedur, produk, sistem ataupun aktivitas baru dan proposal kredit dengan jumlah tertentu serta proposal kredit kepada pihak terkait harus melalui uji kepatuhan yang dilakukan oleh Satuan Kerja Kepatuhan;</p> <p>20. Penugasan Audit kepada Akuntan Publik dan KAP telah memenuhi seluruh aspek yang ditetapkan dan telah sesuai peraturan perundang-undangan yang berlaku. Akuntan Publik (AP) dan Kantor Akuntan Publik (KAP) yang ditunjuk memiliki kinerja yang independen dengan kompetensi yang memadai. Kinerja yang dimiliki baik AP maupun KAP dalam penugasan audit juga telah memenuhi standar profesional Akuntan Publik. Proses penunjukkan AP maupun KAP dilakukan oleh Dewan Komisaris atas wewenang dari RUPS dan rekomendasi dari Komite Audit;</p> <p>21. Akuntan Publik telah melaksanakan audit secara independen dan profesional dan diyakini telah bertindak secara objektif dalam pelaksanaan audit Laporan Keuangan sehingga menghasilkan proses audit yang memadai;</p> <p>22. Bank menerapkan manajemen risiko dan sistem pengendalian intern yang tepat dan efektif, telah memiliki sistem peringatan dini atas risiko dan melakukan evaluasi penerapan manajemen risiko secara berkala dengan berpedoman pada persyaratan dan tata cara sesuai dengan Peraturan Otoritas Jasa Keuangan mengenai penerapan manajemen risiko bagi bank umum;</p> <p>23. Bank memiliki Sistem Informasi Manajemen (SIM) yang digunakan untuk mendukung proses pelaporan internal perusahaan dan memiliki sumber daya manusia dengan tingkat kompetensi dan tingkat keahlian yang memadai guna mendukung penggunaan dan pengembangan sistem informasi Bank;</p>	<p>14. <i>The Board of Commissioners has exercised its authority based on the duties and authorities stipulated in the Bank's Articles of Association and has actively carried out supervision of all bank activities professionally and independently. Supervision of the implementation of the Board of Directors' duties and responsibilities is carried out through routine monthly meetings. In every meeting with the Board of Directors, the Board of Commissioners always asks the Board of Directors to ensure the implementation of the principles of Bank Governance properly;</i></p> <p>15. <i>The Board of Commissioners has actively supervised the implementation of problematic asset management including credit rescue actions and the formation of sufficient reserves, through the identification and verification process of existing exposures;</i></p> <p>16. <i>The Board of Commissioners has formed a Risk Monitoring Committee, an Audit Committee and a Remuneration and Nomination Committee with the number, composition, competence and concurrent positions of Committee members in accordance with applicable provisions without intervention from the owner. The Committee has carried out its duties effectively and provided reports to the Board of Commissioners;</i></p> <p>17. <i>All members of the Board of Commissioners' committee have integrity, independence, competence and adequate financial reputation as well as good morals and ethics. Decisions of the Committee meetings/recommendations are made through deliberation and consensus, in addition to being carried out through circular memos approved by all members of the Committee;</i></p> <p>18. <i>Members of the Board of Directors, members of the Board of Commissioners, members of the Bank Committee, Executive Officers and employees of the Bank do not use the Bank for personal, family and/or other party interests that are detrimental to or reduce the Bank's profits;</i></p> <p>19. <i>To maintain and monitor so that the Bank's business activities do not deviate from the provisions of the law, all policies, procedures, products, systems or new activities and credit proposals with a certain amount and credit proposals to related parties must go through a compliance test conducted by the Compliance Work Unit;</i></p> <p>20. <i>Audit assignments to Public Accountants and Public Accounting Firms have met all aspects that have been set and are in accordance with applicable laws and regulations. The appointed Public Accountants (AP) and Public Accounting Firms (KAP) have independent performance with adequate competence. The performance of both AP and KAP in audit assignments has also met the professional standards of Public Accountants. The appointment process of AP and KAP is carried out by the Board of Commissioners with the authority of the GMS and recommendations from the Audit Committee;</i></p> <p>21. <i>Public Accountants have carried out audits independently and professionally and are believed to have acted objectively in carrying out the audit of the Financial Statements so as to produce an adequate audit process;</i></p> <p>22. <i>The Bank implements appropriate and effective risk management and internal control systems, has an early warning system for risks and conducts periodic evaluations of the implementation of risk management by referring to the requirements and procedures in accordance with the Financial Services Authority Regulation concerning the implementation of risk management for commercial banks;</i></p> <p>23. <i>The Bank has a Management Information System (MIS) which is used to support the Company's internal reporting process and has human resources with adequate levels of competence and expertise to support the use and development of the Bank's information system;</i></p>
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Analisis Analysis

<p>24. Bank memiliki transparansi mengenai tata cara pengaduan dan penyelesaian pengaduan nasabah dan memiliki layanan informasi produk yang dapat diperoleh dengan mudah oleh masyarakat melalui layanan informasi di cabang Bank dan layanan <i>call center</i> dengan nomor 1500035. Selain itu Bank melaksanakan transparansi kondisi keuangan dan non keuangan kepada <i>stakeholders</i>, meliputi kepengurusan, kepemilikan, perkembangan usaha bank dan kelompok usaha bank, strategi dan kebijakan manajemen dan laporan manajemen;</p> <p>25. Bank memiliki sumber daya manusia dengan tingkat kompetensi dan tingkat keahlian yang memadai guna mendukung penyusunan laporan keuangan dan telah mengadakan pelatihan/<i>training</i>/seminar secara berkala kepada seluruh SDM terkait;</p> <p>26. Bank menyusun rencana bisnis secara lengkap dan realistis dengan memperhatikan seluruh faktor eksternal dan faktor internal serta memperhatikan prinsip kehati-hatian dan asas perbankan yang sehat. Rencana Bisnis Bank telah menggambarkan pertumbuhan Bank yang berkesinambungan dan sesuai dengan visi dan misi Bank. Selain itu Bank juga menyusun Rencana Aksi Keuangan Berkelanjutan (RAKB), yang di dalamnya mencantumkan rencana Bank dalam mendukung implementasi penerapan Keuangan Berkelanjutan dalam mewujudkan keberhasilan Pembangunan Berkelanjutan;</p> <p>27. Bank menginformasikan rencana penanganan permasalahan keuangan dan/atau penguatan modal Bank kepada pemegang saham pengendali. Pemegang saham pengendali memiliki komitmen yang tinggi untuk mendukung penguatan, penanganan, dan/atau penyelesaian permasalahan keuangan Bank serta menjaga keberlangsungan usaha Bank;</p> <p>28. Pemegang Saham Pengendali (PSP) senantiasa berkomitmen untuk pemenuhan terhadap ketentuan yang berlaku dalam mendukung bisnis Bank. Dalam hal Bank mengalami permasalahan keuangan dan/atau terdapat kebutuhan penguatan modal, maka PSP akan mendukung secara penuh penguatan, penanganan, dan/atau penyelesaian permasalahan keuangan Bank serta menjaga keberlangsungan usaha Bank;</p> <p>29. Bank menerapkan manajemen risiko dalam sistem pengendalian internal untuk meminimalkan terjadinya <i>fraud</i> dan telah memiliki dan melaksanakan kebijakan Strategi <i>Anti Fraud</i>. Bank memiliki struktur organisasi unit kerja <i>Anti Fraud & Investigation</i> yang melapor langsung ke Direktur Utama dan memiliki hubungan komunikasi dan pelaporan secara langsung kepada Dewan Komisaris;</p> <p>30. Bank menerapkan program APU PPT & PPPSPM dan kewajiban pelaksanaan <i>due diligence</i>, pemantauan, analisa dan identifikasi transaksi keuangan mencurigakan, sesuai yang diatur dalam peraturan perundang-undangan mengenai pencegahan dan pemberantasan TPPU dan TPPT;</p> <p>31. Sebagai salah satu bentuk transparansi kepada <i>Stakeholders</i>, termasuk menyampaikan secara tertulis kepada OJK, Bank menyampaikan Laporan Tahunan, Laporan Keuangan <i>Audited</i>, Laporan Keuangan Publikasi pada <i>Corporate Website</i> sesuai dengan kebijakan dan prosedur yang mengatur tata cara pelaksanaan transparansi terkait informasi kondisi keuangan dan non keuangan;</p> <p>32. Prinsip Tata Kelola diterapkan secara konsisten oleh Pemegang saham, Dewan Komisaris dan Direksi melalui komunikasi yang transparan secara rutin terkait kebijakan, strategi dan <i>performance</i> Bank serta adanya penerapan <i>reward and punishment system</i> berbasis meritokrasi kepada seluruh pegawai;</p> <p>33. Komitmen yang tinggi dari Pemegang saham, Dewan Komisaris, Direksi dan seluruh jajaran dalam lini organisasi dalam mendorong dan menjunjung tinggi budaya kepatuhan dan budaya risiko, integritas, keadilan dan transparansi dalam setiap pelaksanaan tugas dan tanggung jawabnya;</p> <p>34. Bank memiliki Direktur yang membawahkan fungsi kepatuhan dan telah membentuk Satuan Kerja Kepatuhan yang independen terhadap satuan kerja operasional untuk membantu pelaksanaan fungsi Direktur yang membawahkan fungsi kepatuhan secara efektif;</p>	<p>24. <i>The Bank has transparency regarding the procedures for complaints and resolution of customer complaints and has product information services that can be easily obtained by the public through information services at Bank branches and call center services with the number 1500035. In addition, the Bank implements transparency of financial and non-financial conditions to stakeholders, including management, ownership, development of the bank's business and bank business groups, management strategies and policies and management reports;</i></p> <p>25. <i>The Bank has human resources with adequate levels of competence and expertise to support the preparation of financial reports and has held regular training/seminars for all related HR;</i></p> <p>26. <i>The Bank prepares a complete and realistic business plan by considering all external and internal factors and paying attention to the principles of prudence and healthy banking principles. The Bank's Business Plan has described the Bank's sustainable growth and is in accordance with the Bank's vision and mission. In addition, the Bank also prepares a Sustainable Financial Action Plan (RAKB), which includes the Bank's plan to support the implementation of Sustainable Finance in realizing the success of Sustainable Development;</i></p> <p>27. <i>The Bank informs the controlling shareholder of the Bank's financial problem handling and/or capital strengthening plan. The controlling shareholder has a high commitment to support the strengthening, handling, and/or resolution of the Bank's financial problems and maintain the sustainability of the Bank's business;</i></p> <p>28. <i>The Controlling Shareholder (PSP) is always committed to fulfilling the applicable provisions in supporting the Bank's business. In the event that the Bank experiences financial problems and/or there is a need for capital strengthening, the PSP will fully support the strengthening, handling, and/or resolution of the Bank's financial problems and maintain the continuity of the Bank's business;</i></p> <p>29. <i>The Bank implements risk management in the internal control system to minimize fraud, and has and implements an Anti-Fraud Strategy policy. The Bank has an organizational structure for the Anti-Fraud & Investigation work unit that reports directly to the President Director and has a direct communication and reporting relationship to the Board of Commissioners;</i></p> <p>30. <i>The Bank implements the APU PPT & PPPSPM program and the obligation to implement due diligence, monitoring, analysis and identification of suspicious financial transactions, as regulated in the laws and regulations concerning the prevention and eradication of TPPU and TPPT;</i></p> <p>31. <i>As a form of transparency to stakeholders, including submitting in writing to the OJK, the Bank submits the Annual Report, Audited Financial Report, Published Financial Report on the Corporate Website in accordance with the policies and procedures that regulate the procedures for implementing transparency related to financial and non-financial information;</i></p> <p>32. <i>The Governance Principle is consistently applied by Shareholders, the Board of Commissioners and the Board of Directors through routine transparent communication related to the Bank's policies, strategies and performance as well as the implementation of a meritocracy-based reward and punishment system for all employees;</i></p> <p>33. <i>High commitment from Shareholders, the Board of Commissioners, the Board of Directors and all levels in the organizational line in encouraging and upholding a culture of compliance and risk culture, integrity, fairness and transparency in every implementation of their duties and responsibilities;</i></p> <p>34. <i>The Bank has a director who is in charge of the compliance function and has formed a Compliance Work Unit that is independent of the operational work unit to assist in implementing the functions of the Director who is in charge of the compliance function effectively;</i></p>
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**Analysis
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| <p>35. Bank memiliki Satuan Kerja Kepatuhan (SKK) dan Satuan Kerja Manajemen Risiko (SKMR) sebagai <i>second line of defense</i> dan Satuan Kerja Audit Intern (SKAI) sebagai <i>third line of defense</i> yang independen terhadap unit kerja operasional. SKK, SKMR dan SKAI senantiasa meningkatkan kualitas budaya kepatuhan, budaya sadar risiko dan pengendalian internal serta bekerja sama dalam melakukan monitoring pemenuhan komitmen terhadap Otoritas Jasa Keuangan atau Otoritas lainnya melalui pertemuan rutin minimal setiap kuartal;</p> <p>36. Bank membentuk Satuan Kerja Audit Intern (SKAI) yang independen terhadap satuan kerja operasional yang bertanggung jawab langsung kepada Direktur Utama dan memiliki <i>Internal Audit Charter</i> serta metodologi audit yang di <i>review</i> secara berkala. Satuan Kerja Audit Intern (SKAI) independen, bebas dari campur tangan pihak-pihak lain, bebas dari pengaruh apapun, tidak memihak kepada siapa pun dan tidak terlibat dalam pertentangan dan/atau benturan kepentingan;</p> <p>37. Selama semester II tahun 2024, tidak terdapat pelanggaran maupun pelanggaran terhadap Batas Maksimal Pemberian Kredit (BMPK). Pelaksanaan penyediaan dana kepada pihak terkait dan penyediaan dana besar telah berpedoman pada ketentuan OJK tentang Batas Maksimum Pemberian Kredit Bank Umum, ketentuan internal dan prinsip kehati-hatian pemberian kredit;</p> <p>38. Bank melaksanakan transparansi informasi mengenai produk dan penggunaan data pribadi nasabah kepada <i>stakeholders</i> serta telah menjelaskan tujuan dan konsekuensi penyebaran data pribadi nasabah dalam aplikasi pembukaan rekening dan telah memastikan nasabah menyetujui penyebarluasan data nasabah pada saat pembukaan rekening;</p> <p>39. Bank senantiasa melakukan investasi dalam pengembangan SDM, pengembangan IT, kebijakan dan prosedur serta perbaikan dan pengembangan proses, metode, infrastruktur serta kualitas manajemen risiko secara terus menerus antara lain dengan pengkajian kebijakan perkreditan, melakukan sosialisasi <i>Risk Awareness</i>, sertifikasi pejabat Kepatuhan, sertifikasi pejabat Tresuri, sertifikasi pejabat kredit dan Branch Manager, sertifikasi Petugas Operasional Cabang (SPPUR), sertifikasi Penilai Internal Bank, penerapan praktik APU PPT serta penyelenggaraan pelatihan secara berkala dalam rangka meningkatkan kualitas pelayanan kepada nasabah maupun peningkatan kualitas keamanan data;</p> <p>40. Bank menyusun Laporan Pelaksanaan Tata Kelola Bank secara berkala pada setiap akhir tahun buku, dimana laporan tersebut disampaikan pada <i>website</i> perusahaan yaitu www.banksampoerna.com bersamaan dengan Laporan Tahunan. Selain itu Bank melakukan GCG <i>self assessment</i> setiap semester dan menyampaikan laporan hasil <i>self assessment</i> kepada Regulator secara tepat waktu; dan</p> <p>41. Bank senantiasa melakukan pengembangan aplikasi <i>Compliance Regulatory Monitoring Application (CRMA)</i>, modul <i>Compliance Regulatory Self Assesment (CRSA)</i> dan <i>Data Quality Monitoring</i> sebagai sarana untuk mensosialisasikan ketentuan Regulator yang berhubungan langsung dengan operasional perbankan dan untuk memastikan pemenuhan komitmen Bank kepada Regulator agar tidak melebihi batas waktu yang ditetapkan sehingga diperoleh hasil yang efektif, efisien dan tepat sasaran serta mengurangi adanya potensi denda.</p> | <p>35. <i>The Bank has a Compliance Work Unit (SKK) and Risk Management Work Unit (SKMR) as the second line of defense and an Internal Audit Work Unit (SKAI) as the third line of defense that is independent of the operational work unit. SKK, SKMR and SKAI continuously improve the quality of compliance culture, risk awareness culture and internal control and work together in monitoring the fulfillment of commitments to the Financial Services Authority or other Authorities through regular meetings at least every quarter;</i></p> <p>36. <i>The Bank forms an Internal Audit Work Unit (SKAI) that is independent of the operational work unit that is directly responsible to the President Director and has an Internal Audit Charter and audit methodology that is reviewed periodically. The Internal Audit Work Unit (SKAI) is independent, free from interference from other parties, free from any influence, does not side with anyone and is not involved in conflicts and/or conflicts of interest;</i></p> <p>37. <i>During the second semester of 2024, there were no violations or exceedances of the Maximum Credit Limit (BMPK). The implementation of the provision of funds to related parties and the provision of large funds has been guided by the provisions of the OJK concerning the Maximum Credit Limit for Commercial Banks, internal provisions and the principle of prudence in providing credit;</i></p> <p>38. <i>The Bank implements transparency of information regarding products and the use of customer personal data to stakeholders and has explained the purpose and consequences of the dissemination of customer personal data in the account opening application and has ensured that customers agree to the dissemination of customer data when opening an account;</i></p> <p>39. <i>The Bank continues to invest in HR development, IT development, policies and procedures as well as continuous improvement and development of processes, methods, infrastructure and quality of risk management, including by updating credit policies, conducting Risk Awareness dissemination, certification of Compliance officers, certification of Treasury officers, certification of credit officers and Branch Managers, certification of Branch Operational Officers (SPPUR), certification of Internal Bank Assessors, implementation of APU PPT practices and holding regular training in order to improve the quality of service to customers and improve the quality of data security;</i></p> <p>40. <i>The Bank prepares a Bank Governance Implementation Report periodically at the end of each financial year, which the report is submitted on the Company's website, www.banksampoerna.com, together with the Annual Report. In addition, the Bank conducts GCG self-assessment every semester and submits the self-assessment results report to the Regulator in a timely manner; and</i></p> <p>41. <i>The Bank continues to develop the Compliance Regulatory Monitoring Application (CRMA), Compliance Regulatory Self-Assessment (CRSA) module and Data Quality Monitoring as a means to socialize Regulator provisions that are directly related to banking operations and to ensure the fulfillment of the Bank's commitment to the Regulator so as not to exceed the specified time limit so that effective, efficient and targeted results are obtained and reduce the potential for fines.</i></p> |
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Pelaksanaan *self-assessment* Tata Kelola Perusahaan (GCG) Bank Sahabat Sampoerna meliputi 3 aspek, yakni *governance structure*, *governance process*, dan *governance outcome* dengan masing-masing kriteria dan tindak lanjutnya, sebagai berikut:

The Corporate Governance (GCG) self-assessment at Bank Sahabat Sampoerna encompasses three aspects, namely governance structure, governance process, and governance outcome. Each of these aspects has its own set of criteria and subsequent actions, as follows:

Aspek <i>Aspects</i>	Pelaksanaan Tugas dan Tanggung Jawab Direksi <i>Implementation of duties and responsibilities of the Board of Directors</i>	Nilai <i>Score</i>	1
Analisis <i>Analysis</i>			
<p>GOVERNANCE STRUCTURE</p> <p>Faktor-faktor positif aspek <i>governance structure</i> Pelaksanaan Tugas, Tanggung Jawab dan wewenang Direksi adalah:</p> <ul style="list-style-type: none"> • Komposisi Anggota Direksi sudah memenuhi ketentuan yang ditetapkan oleh Regulator. • Pengalaman dan pendidikan anggota Direksi relevan dengan tugas dan tanggung jawab. • Tidak ada perangkapan jabatan. • Tidak ada hubungan keterkaitan satu sama lain. • Seluruh Direksi independen terhadap Pemegang Saham. • Seluruh anggota Direksi mempunyai komitmen yang tinggi dalam mendorong budaya kepatuhan, budaya risiko, serta semangat belajar di setiap jenjang organisasi. <p>Tidak terdapat faktor negatif dalam <i>governance structure</i> Pelaksanaan Tugas, Tanggung Jawab dan wewenang Direksi.</p> <p>GOVERNANCE PROCESS</p> <p>Faktor-faktor positif aspek <i>governance process</i> Pelaksanaan Tugas, Tanggung Jawab dan wewenang Direksi adalah:</p> <ul style="list-style-type: none"> • Seluruh anggota Direksi bertindak secara independen. • Tidak ada intervensi pemilik yang merugikan atau mengganggu operasional Bank. • Direksi melakukan monitoring ketat terhadap <i>progress</i> yang dilakukan seluruh unit kerja termasuk <i>progress</i> dalam rangka pemenuhan ketentuan Bank Indonesia /OJK / Otoritas lainnya. • Direksi tidak memanfaatkan Bank untuk memperoleh keuntungan maupun kepentingan pribadi. • Permintaan data dari Dewan Komisaris selalu dipenuhi secara lengkap, akurat dan tepat waktu. <p>Tidak terdapat faktor negatif dalam <i>governance process</i> Pelaksanaan Tugas, Tanggung Jawab dan wewenang Direksi.</p> <p>GOVERNANCE OUTCOME</p> <p>Faktor-faktor positif aspek <i>governance outcome</i> Pelaksanaan Tugas, Tanggung Jawab dan wewenang Direksi adalah:</p> <ul style="list-style-type: none"> • Setiap tahun Direksi mempertanggungjawabkan pelaksanaan tugas dan tanggung jawab kepada pemegang saham melalui RUPS dan Laporan pertanggungjawaban diterima oleh RUPS. • Komunikasi mengenai kebijakan strategis dilakukan secara transparan melalui tulisan maupun lisan baik melalui tingkatan jenjang organisasi maupun secara langsung kepada karyawan. • Secara kualitas proses, manajemen risiko, budaya kepatuhan, penerapan budaya perusahaan, fungsi SKAI serta <i>system</i> pengendalian intern telah berjalan dengan baik. • Karyawan dipacu untuk terus belajar dan diberi kesempatan untuk mengikuti beberapa pelatihan internal Bank dan eksternal sesuai dengan tugasnya masing-masing. Kinerja individu diukur setiap 6 bulanan dengan <i>Key Performance Indicator</i> yang sudah distandardisasi. • Bank dapat mempertahankan RBBR 2. <p>Tidak terdapat faktor negatif dalam <i>governance outcome</i> Pelaksanaan Tugas, Tanggung Jawab dan wewenang Direksi.</p>	<p>GOVERNANCE STRUCTURE</p> <p><i>Positive factors in the governance structure aspect of the Implementation of Duties, Responsibilities and Authorities of the Board of Directors are:</i></p> <ul style="list-style-type: none"> • <i>The composition of the Board of Directors members has met the provisions set by the Regulator.</i> • <i>The experience and education of the Board of Directors members are relevant to the duties and responsibilities.</i> • <i>There were no concurrent positions.</i> • <i>There was no interconnected relationship with each other.</i> • <i>All Board of Directors were independent of Shareholders.</i> • <i>All members of the Board of Directors have a high commitment to encouraging a culture of compliance, a culture of risk, and a spirit of learning at every level of the organization.</i> <p><i>There were no negative factors in the governance structure of the Implementation of Duties, Responsibilities and Authorities of the Board of Directors.</i></p> <p>GOVERNANCE PROCESS</p> <p><i>Positive factors in the governance process aspect of the Implementation of Duties, Responsibilities and Authorities of the Board of Directors are:</i></p> <ul style="list-style-type: none"> • <i>All members of the Board of Directors act independently.</i> • <i>There was no owner intervention that is detrimental to or disrupts the Bank's operations.</i> • <i>The Board of Directors closely monitors the progress made by all work units including progress in order to fulfill the provisions of Bank Indonesia/OJK/other Authorities.</i> • <i>The Board of Directors did not use the Bank to gain profit or personal interests.</i> • <i>Request for data from the Board of Commissioners was always fulfilled completely, accurately and on time.</i> <p><i>There were no negative factors in the governance process of the Implementation of Duties, Responsibilities and authorities of the Board of Directors.</i></p> <p>GOVERNANCE OUTCOME</p> <p><i>Positive factors in the governance outcome aspect of the Implementation of Duties, Responsibilities and authorities of the Board of Directors are:</i></p> <ul style="list-style-type: none"> • <i>Every year the Board of Directors is accountable for the implementation of duties and responsibilities to shareholders through the GMS and the Accountability Report is received by the GMS.</i> • <i>Communication regarding strategic policies is carried out transparently through writing and verbally both through organizational levels and directly to employees.</i> • <i>In terms of process quality, risk management, compliance culture, implementation of corporate culture, SKAI functions and internal control systems have been running well.</i> • <i>Employees are encouraged to continue learning and are given the opportunity to participate in several of the Bank's internal and external training, in accordance to their respective duties. Individual performance is measured every 6 months with standardized Key Performance Indicators.</i> • <i>Banks can maintain RBBR 2.</i> <p><i>There were no negative factors in the governance outcome of the Implementation of Duties, Responsibilities and Authorities of the Board of Directors.</i></p>		

Aspek <i>Aspects</i>	Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris <i>Implementation of duties and responsibilities of the Board of Commissioners</i>	Nilai <i>Score</i>	1
Analysis <i>Analysis</i>			
<p>GOVERNANCE STRUCTURE</p> <p>Faktor-faktor positif aspek <i>governance structure</i> Pelaksanaan Tugas, Tanggung Jawab Dan Wewenang Dewan Komisaris adalah:</p> <ul style="list-style-type: none"> Seluruh anggota Dewan Komisaris berdomisili di Indonesia. Tidak ada perangkapan jabatan yang tidak sesuai dengan ketentuan OJK. Seluruh anggota Dewan Komisaris memiliki integritas, kompetensi dan reputasi yang baik. Tidak ada hubungan keterkaitan satu sama lain. Komisaris Independen merupakan pihak profesional dan independen terhadap Pemegang Saham. <p>Tidak ada faktor negatif pada aspek <i>governance structure</i> Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris</p>	<p>GOVERNANCE STRUCTURE</p> <p><i>Positive factors in the governance structure aspect of the Implementation of Duties, Responsibilities and Authorities of the Board of Commissioners are:</i></p> <ul style="list-style-type: none"> <i>All members of the Board of Commissioners are domiciled in Indonesia.</i> <i>There were no concurrent positions that are not in accordance with OJK provisions.</i> <i>All members of the Board of Commissioners have integrity, competence and good reputation.</i> <i>There was no interconnected relationship with each other.</i> <i>Independent Commissioners are professional and independent parties to Shareholders.</i> <p><i>There are no negative factors in the governance structure aspect of the Implementation of Duties and Responsibilities of the Board of Commissioners.</i></p>		
<p>GOVERNANCE PROCESS</p> <p>Faktor-faktor positif aspek <i>governance process</i> Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris adalah:</p> <ul style="list-style-type: none"> Bank mempunyai spirit untuk selalu mematuhi ketentuan yang berlaku dalam segala proses termasuk dalam hal pengangkatan anggota Dewan Komisaris. Dewan Komisaris meluangkan waktunya secara maksimal untuk menjalankan tugasnya, memberikan banyak masukan kepada Direksi. Dewan Komisaris tidak turut campur dalam kegiatan operasional maupun keputusan kredit, kecuali pemberian kredit kepada Pihak Terkait dan persetujuan beberapa kebijakan tertentu yang sesuai aturan OJK harus disetujui Komisaris yaitu : APU PPT, Perkreditan dan Restrukturisasi. Dewan Komisaris telah melaksanakan tugas dan tanggung jawabnya secara profesional dan independen. Pemilik tidak pernah melakukan intervensi terhadap pelaksanaan tugas Dewan Komisaris yang menyebabkan operasional Bank terganggu sehingga berdampak pada berkurangnya keuntungan dan/atau menyebabkan kerugian Bank. <p>Tidak ada faktor negatif pada aspek <i>governance process</i> Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris.</p>	<p>GOVERNANCE PROCESS</p> <p><i>Positive factors in the governance process aspect of the Implementation of Duties and Responsibilities of the Board of Commissioners are:</i></p> <ul style="list-style-type: none"> <i>The Bank has the spirit to always comply with applicable provisions in all processes including in the appointment of members of the Board of Commissioners.</i> <i>The Board of Commissioners spends its time maximally to carry out its duties, providing a lot of input to the Board of Directors.</i> <i>The Board of Commissioners did not interfere in operational activities or credit decisions, except for the granting of credit to Related Parties and approval of certain policies that, in accordance with OJK regulations, must be approved by the Commissioner, namely: APU PPT, Credit and Restructuring.</i> <i>The Board of Commissioners has carried out its duties and responsibilities professionally and independently.</i> <i>The owner has never intervened in the implementation of the duties of the Board of Commissioners that disrupted the Bank's operations, resulting in reduced profits and/or causing losses to the Bank.</i> <p><i>There were no negative factors in the governance process aspect of the Implementation of the Duties and Responsibilities of the Board of Commissioners.</i></p>		
<p>GOVERNANCE OUTCOME</p> <p>Faktor-faktor positif aspek <i>governance outcome</i> Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris adalah :</p> <ul style="list-style-type: none"> Hasil rapat Dewan Komisaris dituangkan dalam notulen rapat, didokumentasikan dan didistribusikan dengan baik. Hasil rapat Dewan Komisaris merupakan rekomendasi dan/atau arahan yang dapat diimplementasikan oleh RUPS dan/atau Direksi. Kinerja Bank meningkat dari waktu ke waktu. Secara positif peningkatan tersebut juga disertai peningkatan kualitas proses, manajemen risiko, budaya kepatuhan, fungsi SKAI serta sistem pengendalian intern. <p>Tidak ada faktor negatif pada aspek <i>governance outcome</i> Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris.</p>	<p>GOVERNANCE OUTCOME</p> <p><i>Positive factors in the governance outcome aspect of the Implementation of the Duties and Responsibilities of the Board of Commissioners are:</i></p> <ul style="list-style-type: none"> <i>The results of the Board of Commissioners' meetings are stated in the minutes of the meeting, documented and distributed properly.</i> <i>The results of the Board of Commissioners' meetings are recommendations and/or directives that can be implemented by the GMS and/or the Board of Directors.</i> <i>The Bank's performance has increased over time. Positively, this increase is also accompanied by an increase in the quality of processes, risk management, compliance culture, SKAI functions and internal control systems.</i> <p><i>There were no negative factors in the governance outcome aspect of the Implementation of Duties and Responsibilities of the Board of Commissioners.</i></p>		

Aspek <i>Aspect</i>	Kelengkapan dan Pelaksanaan Tugas Komite <i>Completeness and Implementation of the Committee Duties</i>	Nilai Score	2
Analisis <i>Analysis</i>			
<p>GOVERNANCE STRUCTURE Faktor-faktor positif aspek <i>governance structure</i> Kelengkapan dan Pelaksanaan Tugas Komite adalah:</p> <ul style="list-style-type: none"> • Komite yang dibentuk Direksi dan Dewan Komisaris sudah sesuai dengan ketentuan. • Susunan anggota Komite Dewan Komisaris sudah memenuhi ketentuan yang dipersyaratkan. • Tidak ada intervensi dari pemilik yang menyebabkan tidak terpenuhinya komposisi Komite. <p>Tidak ada faktor negatif pada aspek <i>governance structure</i> Kelengkapan dan Pelaksanaan Tugas Komite.</p> <p>GOVERNANCE PROCESS Faktor-faktor positif aspek <i>governance process</i> Kelengkapan dan Pelaksanaan Tugas Komite adalah:</p> <ul style="list-style-type: none"> • Komite Direksi dan Komite Dewan Komisaris telah melaksanakan tugas dan tanggungjawabnya mengacu ke pedoman tata tertib kerja komite. • Komite Direksi dan Komite Dewan Komisaris melaksanakan tugas, tanggung jawab, dan wewenang dengan berintegritas, independen, memiliki kompetensi, serta menjaga reputasi. • Rapat komite Direksi telah diselenggarakan sesuai dengan kebutuhan Bank. • Frekuensi rapat dan kuorum sudah memenuhi ketentuan. <p>Tidak ada faktor negatif pada aspek <i>governance process</i> Kelengkapan dan Pelaksanaan Tugas Komite.</p> <p>GOVERNANCE OUTCOME Faktor-faktor positif aspek <i>governance outcome</i> Kelengkapan dan Pelaksanaan Tugas Komite adalah:</p> <ul style="list-style-type: none"> • Rekomendasi Komite bermanfaat dan dapat digunakan untuk peningkatan di bidang terkait. • Hasil rapat komite dituangkan dalam risalah rapat, termasuk pengungkapan perbedaan pendapat (<i>dissenting opinions</i>) serta alasannya dan didokumentasikan dengan baik. <p>Faktor-faktor negatif aspek <i>governance outcome</i> Kelengkapan dan Pelaksanaan Tugas Komite adalah:</p> <ul style="list-style-type: none"> • Untuk memenuhi ketentuan Dewan Komisaris wajib melakukan evaluasi terhadap kinerja komite sekurang-kurangnya pada setiap akhir tahun buku, saat ini sedang dilakukan perumusan mekanisme evaluasi kinerja komite sesuai dengan ketentuan POJK no 17 Tahun 2023. • Terkait evaluasi terhadap kebijakan remunerasi merujuk kepada POJK terbaru Nomor 17 tahun 2023 baru mulai akan diterapkan pada tahun ini. 	<p>GOVERNANCE STRUCTURE <i>Positive factors in the governance structure aspect of the Completeness and Implementation of Committee Duties are:</i></p> <ul style="list-style-type: none"> • <i>The Committee formed by the Board of Directors and the Board of Commissioners is in accordance with the provisions.</i> • <i>The composition of the members of the Board of Commissioners Committee has met the required provisions.</i> • <i>There is no intervention from the owner that causes the Committee composition not to be fulfilled.</i> <p><i>There were no negative factors in the governance structure aspect of the Completeness and Implementation of Committee Duties.</i></p> <p>GOVERNANCE PROCESS <i>Positive factors in the governance process aspect of the Completeness and Implementation of Committee Duties are:</i></p> <ul style="list-style-type: none"> • <i>The Board of Directors Committee and the Board of Commissioners Committee have carried out their duties and responsibilities referring to the committee's work procedures guidelines.</i> • <i>The Board of Directors Committee and the Board of Commissioners Committee carry out their duties, responsibilities, and authorities with integrity, independence, competence, and maintain their reputation</i> • <i>The Board of Directors Committee meetings have been held according to the Bank's needs.</i> • <i>The frequency of meetings and quorum have met the requirements.</i> <p><i>There were no negative factors in the governance process aspect of the Completeness and Implementation of Committee Duties.</i></p> <p>GOVERNANCE OUTCOME <i>Positive factors in the governance outcome aspect of the Completeness and Implementation of Committee Duties are:</i></p> <ul style="list-style-type: none"> • <i>The Committee's recommendations are useful and can be used for improvements in related fields.</i> • <i>The results of the committee meeting are stated in the minutes of the meeting, including the disclosure of dissenting opinions and the reasons for them and are well documented.</i> <p><i>Negative factors in the governance outcome aspect of the Completeness and Implementation of Committee Duties are:</i></p> <ul style="list-style-type: none"> • <i>In order to fulfill the provisions of the Board of Commissioners, it is mandatory to evaluate the performance of the committee at least at the end of each financial year, currently the formulation of the committee performance evaluation mechanism is being carried out in accordance with the provisions of POJK no. 17 of 2023.</i> • <i>Regarding the evaluation of the remuneration policy, it refers to the latest POJK Number 17 of 2023 which will only be implemented this year.</i> 		

Aspek <i>Aspect</i>	Penanganan Benturan Kepentingan <i>Managing Conflict of Interes</i>	Nilai <i>Score</i>	1
Analisis <i>Analysis</i>			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Penanganan Benturan Kepentingan Bank adalah:</p> <ul style="list-style-type: none"> Bank telah memiliki Kebijakan Khusus Standar Etika Karyawan, Ketentuan Penerimaan Hadiah dari Pihak Ketiga, SOP Pengadaan Barang dan Jasa dan SOP <i>Vendor Management</i> yang mengatur salah satunya terkait dengan mekanisme pemilihan vendor dan proses pengadaan barang untuk mencegah terjadinya benturan kepentingan. Kebijakan Khusus Standar Etika Karyawan dan Peraturan Perusahaan juga mengatur mengenai pelaporan dan peneraan sanksi apabila terjadi pelanggaran Standar Etika Karyawan. Bank juga memiliki Kebijakan Penerapan Strategi <i>Anti Fraud</i>. Bank telah memiliki kebijakan yang mengatur mengenai benturan kepentingan khususnya terhadap ketentuan dan proses pembiayaan kepada pihak terkait Bank. <p>Tidak terdapat faktor negatif untuk <i>governance structure</i> Penanganan Benturan Kepentingan Bank.</p> <p>Governance Process: Faktor-faktor positif aspek <i>governance process</i> Penanganan Benturan Kepentingan Bank adalah:</p> <ul style="list-style-type: none"> Seluruh anggota Dewan Komisaris, anggota Direksi, dan karyawan di seluruh jenjang organisasi menjunjung tinggi integritas dalam seluruh kegiatan. Optimalisasi Komisi Penegakan Disiplin dan Integritas untuk menjaga konsistensi peneraan sanksi terhadap pelanggaran disiplin dan integritas sesuai ketentuan yang telah ditetapkan. Setiap karyawan telah menandatangani perjanjian kerja yang mencantumkan hak dan kewajiban karyawan, termasuk kepatuhan atas ketentuan terkait benturan kepentingan. Proses pengadaan barang dan/atau jasa telah memperhatikan Tata Kelola yang Baik pada Bank dan dengan prinsip paling sedikit efisien, efektif, transparan, terbuka, bersaing, adil, dan akuntabel, terlepas dari benturan kepentingan. <p>Tidak terdapat faktor negatif pada aspek <i>Governance process</i> Penanganan Benturan Kepentingan Bank</p> <p>Governance Outcome: Faktor-faktor positif aspek <i>governance outcome</i> Penanganan Benturan Kepentingan Bank adalah:</p> <ul style="list-style-type: none"> Komitmen seluruh jajaran Manajemen dalam penerapan integritas. Tidak terjadi benturan kepentingan pada periode laporan. <p>Tidak terdapat faktor negatif dalam <i>governance outcome</i> Penanganan Benturan Kepentingan Bank.</p>	<p>Governance Structure <i>Positive factors in the governance structure aspect of conflict of interest management include:</i></p> <ul style="list-style-type: none"> <i>The Bank has established a Special Policy on Employee Ethics Standards, Regulation on the Acceptance of Gifts from Third Parties, Standard Operating Procedures (SOPs) for the Procurement of Goods and Services, and the Vendor Management SOP. These policies, among other things, regulate the mechanism for vendor selection and procurement processes to prevent conflicts of interest;</i> <i>The Bank's Special Policy on Employee Ethics Standards and Company Regulations also govern the reporting and imposition of sanctions in the event of violations of Employee Ethics Standards;</i> <i>The Bank also has an Anti-Fraud Strategy Implementation Policy; and</i> <i>The Bank has established policies that regulate conflicts of interest, especially regarding provisions and processes for financing to the Bank's related parties.</i> <p><i>There were no negative factors in the governance structure aspect of conflict of interest management.</i></p> <p>Governance Process <i>Positive factors in the governance process aspect of conflict of interest management include:</i></p> <ul style="list-style-type: none"> <i>All members of the Board of Commissioners, Board of Directors, and employees at all organizational levels uphold integrity in all activities;</i> <i>The Discipline and Integrity Enforcement Commission is optimized to maintain consistency in imposing sanctions for violations of discipline and integrity in accordance with established provisions;</i> <i>Every employee has signed an employment agreement that includes the rights and obligations of employees, including compliance with provisions related to conflicts of interest; and</i> <i>The process of procuring goods and/or services has taken into account good corporate governance at the Bank and with the principles of efficiency, effectiveness, transparency, openness, competitiveness, fairness, and accountability, regardless of conflicts of interest.</i> <p><i>There were no negative factors in the governance process aspect of conflict of interest management</i></p> <p>Governance Outcome <i>Positive factors in the governance outcome aspect of conflict of interest management include:</i></p> <ul style="list-style-type: none"> <i>The commitment of the Management to implementing integrity; and</i> <i>There were no conflicts of interest during the reporting period.</i> <p><i>There were no negative factors in the governance outcome aspect of conflict of interest management.</i></p>		

Aspek <i>Aspect</i>	Penerapan Fungsi Kepatuhan <i>Implementation of Compliance Function</i>	Nilai Score	2
Analisis <i>Analysis</i>			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Penerapan Fungsi Kepatuhan Bank adalah:</p> <ul style="list-style-type: none"> • Komitmen yang tinggi dari Direksi terhadap penegakan Budaya Kepatuhan; • Organisasi Satuan Kerja Kepatuhan independen terhadap Satuan Kerja Operasional dan unit kerja lainnya; • SDM di Satuan Kerja Kepatuhan mempunyai pengalaman yang memadai dalam pengelolaan fungsi kepatuhan; • Kebijakan dan SPO Kepatuhan sudah tersedia dan dapat diimplementasikan; • Adanya koordinasi antara SKK, SKMR dan SKAI dalam meningkatkan kualitas budaya kepatuhan, budaya sadar risiko dan pengendalian internal. <p>Tidak terdapat faktor negatif <i>Governance structure</i> di dalam aspek Penerapan Fungsi Kepatuhan.</p> <p>Governance Process Berdasarkan analisis terhadap seluruh kriteria / indikator penilaian tersebut di atas, disimpulkan bahwa: Faktor-faktor positif aspek <i>governance process</i> Penerapan Fungsi Kepatuhan Bank adalah:</p> <ul style="list-style-type: none"> • Kebijakan dan SPO Kepatuhan sudah diimplementasikan dan akan terus dikaji ulang secara berkala. • SKK, SKMR dan SKAI melakukan koordinasi melalui rapat berkala secara triwulanan dengan agenda yang ditentukan untuk membahas permasalahan dan mengupdate informasi terbaru selama periode berjalan. • Sosialisasi budaya kepatuhan dilakukan secara berkelanjutan. <p>Tidak ada faktor negatif pada aspek <i>governance process</i> Penerapan Fungsi Kepatuhan Bank.</p> <p>Governance Outcome Faktor-faktor positif aspek <i>governance outcome</i> Penerapan Fungsi Kepatuhan Bank adalah:</p> <ul style="list-style-type: none"> • Laporan Kepatuhan triwulanan kepada Direktur Utama dan Semesteran kepada OJK sudah disampaikan tepat waktu sesuai ketentuan yang berlaku. • Kepala SKK menyampaikan laporan aktivitas bulanan kepada Direktur Kepatuhan. • Budaya Kepatuhan dibangun melalui berbagai aktivitas di antaranya Sosialisasi <i>Compliance Awareness</i> yang dilakukan secara berkesinambungan setiap tahun. <p>Faktor-faktor negatif aspek <i>governance outcome</i> Penerapan Fungsi Kepatuhan Bank adalah:</p> <ul style="list-style-type: none"> • Terdapat akumulasi sanksi denda dari bulan Januari hingga Desember 2024 sebesar Rp508.955.508,-, 	<p>Governance Structure <i>Positive factors in the governance structure aspect of compliance function implementation include:</i></p> <ul style="list-style-type: none"> • <i>The Board of Directors has a high commitment to enforcing a Compliance Culture;</i> • <i>The Compliance Division organization is independent of the Operations Division and other divisions;</i> • <i>Human resources in the Compliance Division (SKK) have adequate experience in managing the compliance function;</i> • <i>Compliance Policies and Standard Operating Procedures (SOPs) are available and can be implemented;</i> • <i>There is coordination between SKK, SKMR, and SKAI in improving the quality of compliance culture, risk awareness culture, and internal control.</i> <p><i>There were no negative factors in the governance structure aspect of compliance function implementation.</i></p> <p>Governance Process <i>Based on the analysis of all the assessment criteria/indicators above, it is concluded that:</i> <i>Positive factors in the governance process aspect of compliance function implementation include:</i></p> <ul style="list-style-type: none"> • <i>Compliance Policies and SOPs have been implemented and will continue to be reviewed periodically;</i> • <i>SKK, SKMR, and SKAI coordinate through regular quarterly meetings with a predetermined agenda to discuss problems and update the latest information during the year; and</i> • <i>Compliance culture is continually fostered.</i> <p><i>There are no negative factors in the governance process aspect of compliance function implementation.</i></p> <p>Governance Outcome <i>Positive factors in the governance outcome aspect of compliance function implementation include:</i></p> <ul style="list-style-type: none"> • <i>Quarterly Compliance Reports to the President Director and Semi Annual Compliance Reports to the Financial Services Authority have been submitted on time in accordance with applicable provisions ;</i> • <i>The Head of SKK submits monthly activity reports to the Compliance Director; and</i> • <i>Compliance Culture is built through various activities, including Compliance Awareness sessions that are carried out continuously every year.</i> <p><i>Negative factors in the governance outcome aspect of the Bank's Compliance Function Implementation are:</i></p> <ul style="list-style-type: none"> • <i>There was an accumulation of fines from January to December 2024 amounting to Rp508,955,508,-</i> 		

Aspek Aspect	Penerapan Fungsi Audit Intern Implementation of Internal Audit Function	Nilai Score	1
Analisis Analysis			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Penerapan Fungsi Audit Intern Bank adalah:</p> <ul style="list-style-type: none"> Struktur organisasi SKAI telah sesuai dengan Standar Pelaksanaan Fungsi Audit Intern Bank Umum. Selanjutnya struktur organisasi SKAI bersifat dinamis mengikuti perkembangan dan kebutuhan organisasi Bank. Bank telah memiliki <i>Internal Audit Charter</i>. SKAI independen terhadap satuan kerja operasional. Bank telah menyusun dan mengkinikan metodologi <i>audit</i> dan telah disahkan oleh pejabat terkait. <p>Tidak terdapat faktor negatif pada aspek <i>governance structure</i> Penerapan Fungsi Audit Intern Bank</p> <p>Governance Process: Faktor-faktor positif aspek <i>governance process</i> Penerapan Fungsi Audit Intern Bank adalah:</p> <ul style="list-style-type: none"> Temuan Audit dilaporkan secara berkala kepada Direktur Utama, Direktur Kepatuhan dan Manajemen Risiko, Direktur terkait serta Komisaris melalui Komite Audit. Dalam upaya peningkatan, pengembangan pengetahuan, dan keterampilan personil, SKAI telah membuat dan melaksanakan <i>Training</i> dan program sertifikasi. SKAI melakukan monitoring tindak lanjut perbaikan temuan <i>audit</i> sesuai komitmen yang telah disepakati. <p>Tidak terdapat faktor negatif pada aspek <i>governance process</i> Penerapan Fungsi Audit Intern Bank.</p> <p>Governance Outcome: Faktor-faktor positif aspek <i>governance outcome</i> Penerapan Fungsi Audit Intern Bank adalah:</p> <ul style="list-style-type: none"> Laporan hasil pemeriksaan SKAI senantiasa disampaikan kepada OJK, Direktur Utama, Direktur Bidang Terkait, Komisaris melalui Komite Audit serta Direktur Kepatuhan dan Manajemen Risiko. Manajemen dan Direktur yang terkait telah melaksanakan kegiatan berdasarkan prinsip Tata Kelola yang baik, termasuk didalamnya menindaklanjuti laporan hasil Audit. <p>Tidak terdapat faktor negatif dalam <i>governance outcome</i> Penerapan Fungsi Audit Intern Bank.</p>	<p>Governance Structure <i>Positive factors in the governance structure aspect of the implementation of the internal audit function include:</i></p> <ul style="list-style-type: none"> <i>The organizational structure of the Internal Audit Division (SKAI) is in accordance with the implementation standards of the Commercial Bank Internal Audit Function. Furthermore, the organizational structure of SKAI is dynamic, following the development and needs of the Bank's organization;</i> <i>The Bank has an Internal Audit Charter;</i> <i>SKAI is independent of the Operations Division; and</i> <i>The Bank has developed and updated the audit methodology, which has been ratified by the relevant officers.</i> <p><i>There were no negative factors in the governance structure aspect of the implementation of the internal audit function.</i></p> <p>Governance Process <i>Positive factors in the governance process aspect of the implementation of the internal audit function include:</i></p> <ul style="list-style-type: none"> <i>Audit findings are reported regularly to the President Director, Compliance and Risk Director, related Directors, and Commissioners through the Audit Committee;</i> <i>To improve and develop knowledge and skills, SKAI personnel have organized and conducted training and certification programs; and</i> <i>SKAI monitors follow-ups on audit findings in accordance with the agreed commitment.</i> <p><i>There were no negative factors in the governance process aspect of the implementation of the internal audit function.</i></p> <p>Governance Outcome <i>Positive factors in the governance outcome aspect of the implementation of the internal audit function include:</i></p> <ul style="list-style-type: none"> <i>SKAI audit reports are always submitted to the Financial Services Authority, the President Director, the relevant Directors, the Board of Commissioners, and the Compliance and Risk Management Director; and</i> <i>Management and the relevant Directors have carried out activities based on good corporate governance principles, including following up on the Audit Report.</i> <p><i>There were no negative factors in the governance outcome aspect of the implementation of the internal audit function.</i></p>		

Aspek <i>Aspect</i>	Penerapan Fungsi Audit Ekstern <i>Implementation of External Audit Function</i>	Nilai Score	1
Analisis <i>Analysis</i>			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Penerapan Fungsi Audit Ekstern adalah:</p> <ul style="list-style-type: none"> Bank telah memenuhi aspek <i>governance structure</i> dalam Penerapan Fungsi Audit Ekstern. Pemenuhan aspek <i>governance structure</i> dicerminkan dengan kebijakan Bank yang menunjuk baik Akuntan Publik (AP) maupun Kantor Akuntan Publik (KAP) berdasarkan kapasitas yang dimilikinya. Kebijakan ini dimaksudkan agar dapat menghasilkan <i>outcome</i> yang sesuai dengan harapan para <i>stakeholders</i> Bank, yaitu hasil audit yang memadai yang mampu menggambarkan permasalahan Bank secara signifikan. Tidak terdapat faktor negatif pada aspek <i>governance structure</i> Penerapan Fungsi Audit Ekstern. Bank mampu memenuhi semua aspek yang dipersyaratkan dalam <i>governance structure</i> Penerapan Fungsi Audit Ekstern Bank. <p>Governance Process: Faktor-faktor positif aspek <i>governance process</i> Penerapan Fungsi Audit Ekstern adalah:</p> <ul style="list-style-type: none"> Bank telah memastikan terpenuhinya aspek <i>governance process</i> Penerapan Fungsi Audit Ekstern. Pemenuhan ini didasarkan atas Akuntan Publik (AP) dan Kantor Akuntan Publik (KAP) yang ditunjuk memiliki kinerja yang independen dengan kompetensi yang memadai. Kinerja yang dimiliki baik AP maupun KAP dalam penugasan audit juga telah memenuhi standar profesional Akuntan Publik. Hal ini tidak terlepas dari efektivitas kebijakan Bank dalam penugasan audit, yang memilih baik AP maupun KAP yang telah terdaftar sebagai Auditor Bank di OJK melalui proses penunjukan yang dilakukan oleh Dewan Komisaris atas wewenang dari RUPS dan rekomendasi dari Komite Audit. <p>Tidak terdapat faktor negatif pada aspek <i>Governance process</i> Penerapan Fungsi Audit Ekstern.</p> <p>Governance Outcome: Faktor-faktor positif aspek <i>governance outcome</i> Penerapan Fungsi Audit Ekstern adalah:</p> <ul style="list-style-type: none"> Aspek <i>governance outcome</i> Penerapan Fungsi Audit Ekstern diwujudkan melalui hasil audit dan <i>management letter</i> yang telah mampu menggambarkan kondisi dan permasalahan Bank secara signifikan. Kualitas hasil audit yang memadai membantu Bank dalam melakukan perbaikan dan perubahan atas permasalahan yang telah ditemukan. Selain itu, hasil audit juga telah disampaikan secara tepat waktu sesuai dengan <i>timeline</i> yang telah disepakati sebelumnya. <p>Tidak terdapat faktor negatif dalam <i>governance outcome</i> Penerapan Fungsi Audit Ekstern.</p>	<p>Governance Structure <i>Positive factors in the governance structure aspect of the implementation of the external audit function include:</i></p> <ul style="list-style-type: none"> <i>The Bank has fulfilled the governance structure aspect in the implementation of the External Audit Function. This fulfillment is reflected in the Bank's policy of appointing both Public Accountants (AP) and Public Accounting Firms (KAP) based on their capacity. This policy is intended to produce an outcome that aligns with the expectations of the Bank's stakeholders, namely an adequate audit report that can significantly describe the Bank's issues.</i> <i>There are no negative factors in the governance structure aspect of the implementation of the external audit function. The Bank is able to fulfill all aspects required in the governance structure of the implementation of the external audit function.</i> <p>Governance Process <i>Positive factors in the governance process aspect of the implementation of the external audit function include:</i></p> <ul style="list-style-type: none"> <i>The Bank has ensured the fulfillment of the governance process aspect in the implementation of the External Audit Function. This fulfillment is based on the fact that the appointed AP and KAP have independent performance with adequate competence. The performance of both AP and KAP in audit assignments also meets the professional standards of public accountants. This performance is closely linked to the effectiveness of the Bank's policy on audit assignments to select both AP and KAP registered as Bank Auditors at the Financial Services Authority through the appointment process carried out by the Board of Commissioners based on the authority of the General Meeting of Shareholders (GMS) and recommendations from the Audit Committee.</i> <p><i>There were no negative factors in the governance process aspect of the implementation of the external audit function.</i></p> <p>Governance Outcome <i>Positive factors in the governance outcome aspect of the implementation of the External Audit Function include:</i></p> <ul style="list-style-type: none"> <i>The governance outcome aspect of the implementation of the external audit function is realized through audit reports and management letters that can significantly describe the condition and problems of the Bank. The adequate quality of audit reports helps the Bank in making improvements and changes to the problems found. In addition, audit reports have been submitted on time within the agreed timeline.</i> <p><i>There were no negative factors in the governance outcome aspect of the implementation of the external audit function</i></p>		

Aspek Aspect	Penerapan Fungsi Manajemen Risiko, termasuk Pengendalian Internal Implementation of Risk Management Function, including Internal Control System	Nilai Score	2
Analisis Analysis			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Penerapan Manajemen Risiko termasuk Sistem Pengendalian Intern Bank adalah:</p> <ul style="list-style-type: none"> Dengan dukungan penuh dari Manajemen Bank, struktur organisasi telah disesuaikan dengan ketentuan yang berlaku dengan menerapkan asas independensi dari SKAI, SKK dan SKMR dan penerapan prinsip kehati-hatian serta <i>Good Corporate Governance</i>. Bank telah memiliki kebijakan, prosedur dan penetapan limit risiko yang memadai <p>Faktor-faktor negatif aspek <i>governance structure</i> Penerapan Manajemen Risiko termasuk Sistem Pengendalian Intern Bank adalah:</p> <ul style="list-style-type: none"> Saat ini sedang dilakukan proses pengkinian Kebijakan Umum Manajemen Risiko (KUMR) terutama terkait penerapan manajemen risiko untuk <i>country risk</i> dan <i>transfer risk</i>. <p>Governance Process: Faktor-faktor positif aspek <i>governance process</i> Penerapan Manajemen Risiko termasuk Sistem Pengendalian Intern Bank adalah:</p> <ul style="list-style-type: none"> Dewan Komisaris dan Direksi masing-masing memiliki tugas dan tanggung jawab yang jelas dan berperan membangun budaya sadar risiko yang didukung oleh adanya satuan kerja yang independen dari kegiatan operasional yaitu SKMR, SKK dan SKAI. Kebijakan Manajemen Risiko telah dilakukan evaluasi secara berkala menyesuaikan dengan kebutuhan dan kompleksitas usaha bank dan adanya ketentuan regulator terbaru Penerapan budaya Manajemen Risiko termasuk kesadaran risiko telah dikomunikasikan pada seluruh jenjang organisasi Bank telah menerapkan program anti pencucian uang pencegahan pendanaan terorisme, dan pencegahan pendanaan proliferasi senjata pemusnah massal mencakup pencegahan dan penanganan <p>Faktor-faktor negatif aspek <i>governance process</i> Penerapan Manajemen Risiko termasuk Sistem Pengendalian Intern Bank adalah:</p> <ul style="list-style-type: none"> Untuk meningkatkan penerapan manajemen risiko, budaya kepatuhan, pengendalian internal serta <i>Good Corporate Governance</i> pada seluruh Unit Kerja terkait/<i>Risk Taking Unit</i>, masih diperlukan optimalisasi dari sosialisasi - sosialisasi yang telah dilakukan atas kebijakan dan prosedur operasional serta peningkatan infrastruktur secara bertahap dan berkesinambungan dalam melaksanakan kebijakan dan prosedur. <p>Governance Outcome Faktor-faktor positif aspek <i>governance outcome</i> Penerapan Manajemen Risiko termasuk Sistem Pengendalian Intern Bank adalah:</p> <ul style="list-style-type: none"> Penerapan Manajemen Risiko telah diterapkan secara efektif dan dilakukan pengawasan secara aktif. Kemampuan permodalan bank mampu meng-cover dan menyerap risiko kerugian yang terjadi Bank telah menerapkan program APU PPT & PPPSPM dan melaksanakan kewajiban internalisasi POJK 8 tahun 2023 tentang Penerapan Program APU PPT & PPPSPM di Sektor Jasa Keuangan pada Kebijakan Khusus APU PPT & PPPSPM dan SOP Pelaksanaan Tugas dan Tanggung Jawab UKK APU PPT & PPPSPM yang efektif berlaku di 9 November 2023 	<p>Governance Structure <i>Positive factors in the governance structure aspect of risk management implementation, including internal control systems, are:</i></p> <ul style="list-style-type: none"> <i>With full support from the Bank's Management, the organizational structure has been adjusted to align with applicable regulations by applying the principle of independence of SKAI, SKK, and SKMR and the application of the prudential principle, as well as Good Corporate Governance (GCG).</i> <i>The Bank has adequate risk policies, procedures, and risk limits.</i> <p><i>Negative factors in the governance structure aspect of Risk Management Implementation including the Bank's Internal Control System are:</i></p> <ul style="list-style-type: none"> <i>Currently, the process of updating the General Risk Management Policy (KUMR) is being carried out, especially regarding the implementation of risk management for country risk and transfer risk.</i> <p>Governance Process <i>Positive factors in the governance process aspect of risk management implementation, including internal control systems, are:</i></p> <ul style="list-style-type: none"> <i>The Board of Commissioners and the Board of Directors each have clear duties and responsibilities and play a role in building a risk-aware culture supported by divisions that are independent of operational activities, namely SKMR, SKK, and SKAI;</i> <i>Risk Management Policy has been evaluated periodically in accordance with the needs and complexity of the Bank's business and the latest regulatory provisions;</i> <i>The implementation of risk management culture, including risk awareness, has been communicated to all organizational levels; and</i> <i>The Bank has implemented an anti-money laundering, counter terrorism financing, and counter-proliferation of weapons of mass destruction financing (AML-CTF & CPF) program, which includes prevention and handling.</i> <p><i>There are negative factors in the aspects of governance process, implementation of risk management, including the internal control system.</i></p> <ul style="list-style-type: none"> <i>This happened in order to improve the risk management implementation of risk management, compliance culture, internal control, and GCG in all related divisions/risk-taking units, optimized dissemination of operational policies and procedures is still necessary, as well as gradual and continuous infrastructure improvements in implementing policies and procedures.</i> <p>Governance Outcome <i>Positive factors in the governance outcome aspect of risk management implementation, including internal control systems, are:</i></p> <ul style="list-style-type: none"> <i>Risk management has been effectively implemented and actively supervised;</i> <i>The Bank's capital is able to update and absorb the risk of losses that occur; and</i> <i>The Bank has implemented an AML-CTF & CPF Program and carried out the obligation of internalizing Financial Services Authority Regulation No. 8 of 2023 on the Implementation of AML-CTF & CPF Program in the Financial Services Sector in the AML-CTF & CPF Special Policy and the SOP for the Implementation of Duties and Responsibilities of AML CTF & CPF Competency Test (UKK) which is effective on November 9, 2023.</i> 		

Aspek <i>Aspect</i>	Penerapan Fungsi Manajemen Risiko, termasuk Pengendalian Internal <i>Implementation of Risk Management Function, including Internal Control System</i>	Nilai Score	2
Analisis <i>Analysis</i>			
<p>Faktor-faktor negatif aspek <i>governance outcome</i> Penerapan Manajemen Risiko termasuk Sistem Pengendalian Intern Bank adalah:</p> <ul style="list-style-type: none"> <i>Risk Appetite & Limit</i> yang terlampaui masih harus terus dilakukan pemantauan (monitoring) secara berkala (setiap bulan) sehingga dapat diidentifikasi secara dini langkah-langkah penyelesaian khususnya terkait limit yang terlampaui. <i>Risk appetite</i> atas ROA, BOPO dan RIM masih melampaui <i>statement</i> yang ditetapkan manajemen. Selain itu juga masih terdapat pelampauan atas limit kredit terhadap parameter / <i>indicator</i> yang ditetapkan manajemen agar kedepannya sesuai dengan limit yang ditetapkan. Saat ini Bank sedang melakukan proses <i>review</i> terhadap <i>risk appetite & limit</i> sehingga parameter yang akan diatur tersebut sesuai dengan limit dan <i>appetite</i> internal Bank. Berdasarkan profil risiko, secara komposit peringkat Risiko Kredit Bank masih pada peringkat <i>Moderate</i>, namun Bank telah melakukan upaya-upaya perbaikan untuk meningkatkan kualitas dan efektivitas penerapan manajemen risiko khususnya risiko kredit, agar sejalan dengan <i>risk appetite</i> internal Bank. 		<p>There are negative factors in the aspects of <i>governance outcome</i>, implementation of risk management, including the internal control system, including:</p> <ul style="list-style-type: none"> <i>Breached Risk Appetite & Limits</i> continue to be monitored regularly (every month) to enable early identification of solutions, especially related to the breached limits. The risk appetite for ROA, BOPO, and RIM still exceeds management's <i>statement</i>. In addition, there are breaches of credit limits against the parameters/indicators set by Management. It is expected that in the future the established limits are not breached. Currently, the Bank is conducting a review process on risk appetite & limit so that the parameters to be regulated are in accordance with the Bank's internal limit and appetite; and Based on the risk profile, the Bank's composite credit risk rating is still at the <i>Moderate</i> level, but the Bank has made efforts to improve the quality and effectiveness of risk management implementation, especially credit risk, to align with the Bank's internal risk appetite. 	
Aspek <i>Aspect</i>	Pemberian Remunerasi <i>Provision of Remuneration</i>	Nilai Score	1
Analisis <i>Analysis</i>			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Pemberian Remunerasi adalah:</p> <ul style="list-style-type: none"> Susunan anggota Komite Remunerasi dan nominasi yang dibentuk Dewan Komisaris sesuai dengan ketentuan yang berlaku. Tidak ada anggota Direksi yang merangkap sebagai anggota Komite dan Nominasi Bank telah menetapkan kebijakan yang menjadi <i>Material Risk Taker</i> bagi Dewan Direksi, Dewan Komisaris, serta Pejabat Eksekutif dan pegawai <p>Tidak terdapat faktor negatif aspek <i>governance structure</i> Pemberian Remunerasi</p>		<p>Governance Structure Positive factors in the <i>governance structure</i> aspect of the provision of remuneration include:</p> <ul style="list-style-type: none"> The composition of members of the Remuneration and Nomination Committee formed by the Board of Commissioners is in accordance with the applicable regulations; There are no members of the Board of Directors who also serve as members of the Remuneration and Nomination Committee; and The Bank has established a policy that identifies the <i>Material Risk Takers</i> for the Board of Directors, Board of Commissioners, Executive Officers and employees. <p>There are no negative factors in the <i>governance structure</i> aspect of the provision of remuneration.</p>	
<p>Governance Process Faktor-faktor positif aspek <i>governance process</i> Pemberian Remunerasi adalah:</p> <ul style="list-style-type: none"> Bank telah melaksanakan kebijakan remunerasi sesuai dengan Peraturan Otoritas Jasa Keuangan mengenai penerapan tata kelola dalam pemberian remunerasi bagi bank umum Bank menerapkan tata kelola dengan telah memperhatikan prinsip kehati-hatian dalam pemberian remunerasi Komite Remunerasi telah melaksanakan tugas dan tanggung jawabnya secara independen <p>Tidak terdapat faktor negatif aspek <i>governance process</i> Pemberian Remunerasi</p>		<p>Governance Process Positive factors in the <i>governance process</i> aspect of the provision of remuneration:</p> <ul style="list-style-type: none"> The Bank has implemented a remuneration policy in accordance with the Financial Services Authority regulation on corporate governance implementation in the provision of remuneration for Commercial Banks; The Bank has implemented corporate governance by considering the prudent principle in providing remuneration; and The Remuneration Committee has carried out its duties and responsibilities independently. <p>There are no negative factors in the <i>governance process</i> aspect of the provision of remuneration.</p>	
<p>Governance Outcome Faktor-faktor positif aspek <i>governance outcome</i> Pemberian Remunerasi adalah: Bank telah mengungkapkan informasi kebijakan Remunerasi dalam laporan tahunan pelaksanaan tata kelola.</p> <p>Tidak terdapat faktor negatif aspek <i>governance outcome</i> Pemberian Remunerasi</p>		<p>Governance Outcome Positive factors in the <i>governance outcome</i> aspect of the provision of remuneration include: The Bank has disclosed the Remuneration Policy information in the Annual Corporate Governance (GCG) Implementation Report.</p> <p>There are no negative factors in the <i>governance outcome</i> aspect of the provision of remuneration.</p>	

Aspek Aspect	Penyediaan Dana kepada Pihak Terkait dan Penyediaan Dana Besar Provision of Funds to Related Parties and Provision of Large Exposures	Nilai Score	2
Analisis Analysis			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Penyediaan Dana kepada Pihak Terkait dan Penyediaan Dana Besar Bank adalah: Bank telah memiliki kebijakan, sistem dan prosedur yang tertulis dan jelas untuk penyediaan dana kepada pihak terkait dan penyediaan dana besar, yang diatur dalam Pedoman Pemberian Kredit (PPK) tahun 2020 dalam BAB XII Batas Maksimum Pemberian Kredit (BMPK) dan Surat Kuasa Substitusi.</p> <p>Faktor-faktor negatif aspek <i>governance structure</i> Penyediaan Dana kepada Pihak Terkait dan Penyediaan Dana Besar Bank adalah: Ketentuan penyediaan dana kepada pihak terkait dan penyediaan dana besar sedang dalam proses <i>review</i> berkala, Bank saat ini sedang melakukan penyesuaian ketentuan tersebut di dalam Pedoman Pemberian Kredit (PPK) dengan target penyelesaian Semester I tahun 2025.</p> <p>Governance Process Faktor-faktor positif aspek <i>governance process</i> Penyediaan Dana kepada Pihak Terkait dan Penyediaan Dana Besar Bank adalah: Dalam penyediaan dana kepada pihak terkait dan atau penyediaan dana besar, Bank selalu memperhatikan ketentuan OJK tentang BMPK, ketentuan internal dan prinsip kehati-hatian. Sehingga tidak terdapat pelanggaran ataupun pelanggaran terhadap ketentuan BMPK.</p> <p>Tidak terdapat faktor negatif dalam aspek <i>governance process</i> Penyediaan Dana kepada Pihak Terkait dan Penyediaan Dana Besar Bank</p> <p>Governance Outcome Faktor-faktor positif aspek <i>governance outcome</i> Penyediaan Dana kepada Pihak Terkait dan Penyediaan Dana Besar Bank adalah:</p> <ul style="list-style-type: none"> • Bank belum pernah melakukan pelanggaran ataupun pelanggaran terhadap ketentuan OJK mengenai BMPK • Bank telah menyampaikan laporan penyediaan dana kepada pihak terkait dan penyediaan dana besar (debitur inti) setiap bulannya kepada Otoritas Jasa Keuangan secara tepat waktu. • Bank telah menerapkan prinsip kehati-hatian dalam penyediaan dana untuk menghindari kegagalan usaha Bank akibat konsentrasi penyediaan dana besar Bank • Posisi Desember 2024, realisasi rasio CAR sebesar 28,93% lebih tinggi dari target sebesar 22,89% (deviasi positif sebesar 6,04%). <p>Faktor-faktor negatif aspek <i>governance outcome</i> Penyediaan Dana kepada Pihak Terkait dan Penyediaan Dana Besar Bank adalah:</p> <ul style="list-style-type: none"> • Diversifikasi portofolio penyediaan dana besar pada individu selain pihak terkait per Desember 2024 sebesar Rp4.864.821 Juta (40,24% dari portofolio kredit), hal ini agar menjadi perhatian karena terdapat konsentrasi risiko kredit yang cukup besar. 	<p>Governance Structure Positive factors in the <i>governance structure</i> aspect of providing funds to related parties and large exposures include: The Bank has established clear and written policies, systems, and procedures for providing funds to related parties and large exposures, which are regulated in the 2020 Credit Provision Guidelines (PPK) in Chapter XII Legal Lending Limit (LLL) and Power of Attorney for Substitution.</p> <p>Negative factors in the <i>governance structure</i> aspect of Provision of Funds to Related Parties and Provision of Large Exposures include: Arrangements in provisions of funds to related parties and provisions of large exposures are in the process of periodic review, the Bank is currently adjusting these provisions in the Credit Provision Guidelines (PPK) with a target completion in Semester I of 2025.</p> <p>Governance Process Positive factors in the <i>governance process</i> aspect of providing funds to related parties and large exposures include: In providing funds to related parties and/or large exposures, the Bank always takes into account Financial Services Authority regulations on LLL, internal provisions, and the prudential principle, ensuring no violations or breaches of the LLL provisions.</p> <p>There are no negative factors in the <i>governance process</i> aspect of providing funds to related parties and large exposures.</p> <p>Governance Outcome Positive factors in the <i>governance outcome</i> aspect of providing funds to related parties and large exposures include:</p> <ul style="list-style-type: none"> • The Bank has never violated or breached Financial Services Authority regulations on LLL; • The Bank has submitted monthly reports on the provision of funds to related parties and large exposures (core debtors) to the Financial Services Authority on time; • The Bank has applied the prudential principle in providing funds to avoid business failure due to the concentration of large exposures; and • The CAR ratio as of December 2023 was 28.93%, higher than the target of 22.89% (a positive deviation of 6.04%). <p>The negative factors of <i>governance outcome</i> aspects of Provision of Funds to Related Parties and Provision of Large Funds of the Bank are:</p> <ul style="list-style-type: none"> • Diversification of the portfolio of providing large funds to individuals other than related parties as of December 2024 amounted to Rp4,864,821 Million (40.24% of the credit portfolio), this should be a concern because there is a considerable concentration of credit risk. 		

Aspek <i>Aspect</i>	Integritas Pelaporan dan Sistem Teknologi Informasi <i>Integrity of Reporting and Information Technology Systems</i>	Nilai Score	1
Analisis <i>Analysis</i>			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Integritas Pelaporan dan Sistem Teknologi Informasi, adalah: Bank telah memiliki kecukupan struktur dan infrastruktur Tata Kelola dalam transparansi kondisi keuangan dan non-keuangan. Hal ini dapat digambarkan sebagai berikut:</p> <ul style="list-style-type: none"> • Bank telah memiliki kebijakan dalam bentuk SOP yang mengatur pelaksanaan penyusunan laporan yang ditujukan kepada para <i>stakeholders</i>. • Laporan Pelaksanaan Tata Kelola perusahaan telah disusun pada setiap akhir tahun buku sesuai ketentuan yang berlaku. • Bank telah memiliki sebuah Sistem Informasi Manajemen (SIM) yang digunakan untuk mendukung proses pelaporan di dalam internal perusahaan • Bank telah memiliki SDM dengan tingkat kompetensi yang memadai dan andal guna mendukung pengelolaan dan pengembangan sistem informasi yang dimiliki oleh Bank. <p>Tidak terdapat faktor negatif aspek <i>governance structure</i> Integritas Pelaporan dan Sistem Teknologi Informasi.</p> <p>Governance Process Faktor-faktor positif aspek <i>governance process</i> Integritas Pelaporan dan Sistem Teknologi Informasi adalah:</p> <ul style="list-style-type: none"> • Bank telah menyusun Laporan Tahunan secara transparan dan telah menyampaikannya kepada Otoritas Jasa Keuangan dan Pemangku Kepentingan (<i>stakeholders</i>) tepat waktu dan sesuai ketentuan yang berlaku. • Bank telah menyusun laporan pelaksanaan Tata Kelola (GCG) pada setiap tahunnya di akhir periode dengan isi dan cakupan yang telah sesuai dengan kriteria yang telah ditentukan • Bank sudah menerapkan transparansi produk dan informasi data nasabah sesuai ketentuan yang berlaku. Bank selalu mengkinikan informasi di <i>website</i> Bank sesuai aturan yang berlaku. • Bank sudah menerapkan tata cara pengaduan dan penyelesaian pengaduan nasabah sesuai ketentuan Regulator yang berlaku. <p>Tidak terdapat faktor negatif dalam aspek <i>governance process</i> Integritas Pelaporan dan Sistem Teknologi Informasi.</p> <p>Governance Outcome Faktor-faktor positif aspek <i>governance outcome</i> Integritas Pelaporan dan Sistem Teknologi Informasi adalah:</p> <ul style="list-style-type: none"> • Laporan Tahunan sudah disampaikan kepada Otoritas Jasa Keuangan dan seluruh <i>stakeholders</i> secara tepat waktu, sesuai ketentuan yang berlaku. • Transparansi laporan telah dilakukan dengan cakupan sesuai ketentuan dan dipublikasikan pada <i>website</i> Bank. • Laporan Pelaksanaan Tata Kelola Bank telah mencerminkan kondisi Bank yang sebenarnya. • Tidak terdapat penyalahgunaan rekayasa keuangan dan/atau rekayasa hukum untuk kepentingan Bank dan/atau pihak lain baik internal maupun eksternal Bank. <p>Tidak terdapat faktor negatif dalam aspek <i>governance outcome</i> Integritas Pelaporan dan Sistem Teknologi Informasi.</p>	<p>Governance Structure <i>Positive factors in the governance structure aspect of reporting integrity and information technology systems include:</i> <i>The Bank has adequate structure and infrastructure for Corporate Governance (GCG) in the transparency of financial and non-financial conditions, as follows:</i></p> <ul style="list-style-type: none"> • <i>The Bank has established policies in the form of SOPs that regulate the preparation of reports intended for stakeholders;</i> • <i>The Corporate Governance (GCG) Implementation Report has been prepared at the end of each financial year in accordance with applicable regulations;</i> • <i>The Bank has a Management Information System (MIS) that supports the Bank's internal process in accurate and timely internal reporting;</i> • <i>The Bank has human resources with adequate and reliable competence to support the management and development of the Bank's information systems.</i> <p><i>There are no negative factors in the governance structure aspect of reporting integrity and information technology systems.</i></p> <p>Governance Process <i>Positive factors in the governance process aspect of reporting integrity and information technology systems include:</i></p> <ul style="list-style-type: none"> • <i>The Bank has prepared the Annual Report transparently and has submitted it to the Financial Services Authority and stakeholders on time and in accordance with applicable regulations;</i> • <i>The Bank has prepared the Corporate Governance (GCG) Implementation Report annually at the end of each period with content and scope that are in accordance with the established criteria;</i> • <i>The Bank has implemented transparency of products and customer data information in accordance with applicable provisions. The Bank always updates information on the Bank's website in accordance with applicable regulations; and</i> • <i>The Bank has implemented complaint-handling procedures and customer complaint resolution in accordance with applicable regulatory provisions.</i> <p><i>There are no negative factors in the governance process aspect of reporting integrity and information technology systems.</i></p> <p>Governance Outcome <i>Positive factors in the governance outcome aspect of reporting integrity and information technology systems include:</i></p> <ul style="list-style-type: none"> • <i>The Annual Report has been submitted to the Financial Services Authority and all stakeholders on time, in accordance with applicable provisions;</i> • <i>Transparency of the report has been carried out with the scope of the report in accordance with the provisions and publication on the Bank's website;</i> • <i>The Bank's Corporate Governance (GCG) Implementation Report has reflected the actual condition of the Bank; and</i> • <i>There has been no misuse of financial engineering and/or legal engineering for the benefit of the Bank and/or other parties, both internal and external to the Bank.</i> <p><i>There are no negative factors in the governance outcome aspect of reporting integrity and information technology systems.</i></p>		

Aspek <i>Aspect</i>	Rencana Strategis Bank <i>Bank's Strategic Plans</i>	Nilai <i>Score</i>	2
Analysis <i>Analysis</i>			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Rencana Strategis Bank adalah:</p> <ul style="list-style-type: none"> Rencana Strategis Bank dituangkan di dalam Rencana Bisnis Bank dan telah sesuai dengan visi dan misi Bank. Rencana Aksi Keuangan Berkelanjutan (RAKB) telah dilakukan beberapa aksi yang terkait pengembangan kapasitas karyawan melalui pelatihan/<i>training</i> yang bersertifikasi OJK. Pemegang saham senantiasa mendukung Rencana Strategis Bank dengan memperkuat permodalan. <p>Tidak terdapat faktor negatif dalam aspek <i>governance structure</i> Rencana Strategis Bank</p> <p>Governance Process Faktor-faktor positif aspek <i>governance process</i> Rencana Strategis Bank adalah:</p> <ul style="list-style-type: none"> Bank telah menyusun Rencana Bisnis secara lengkap dan realistis dengan memperhatikan seluruh faktor eksternal dan faktor internal serta memperhatikan prinsip kehati-hatian dan asas perbankan yang sehat. Direksi telah mengkomunikasikan Rencana Bisnis Bank dengan menyampaikan hasil penyusunan Rencana Bisnis Bank kepada pemegang saham Bank serta kepada seluruh Kepala Divisi/Satuan Kerja melalui Rapat Direksi dengan Kepala Divisi. Para Kepala Divisi/Satuan Kerja yang ada selanjutnya menyampaikan kepada jajaran dibawahnya. Dewan Komisaris melaksanakan pengawasan terhadap pelaksanaan Rencana Bisnis Bank melalui rapat rutin bulanan antara Dewan Komisaris dengan Direksi, serta menyampaikan beberapa <i>concern</i> secara langsung kepada Direksi untuk mendapatkan penjelasan lebih lanjut. Pemegang Saham Bank menunjukkan keseriusan dalam mendukung Rencana Strategis Bank. <p>Tidak terdapat faktor negatif dalam aspek <i>governance process</i> Rencana Strategis Bank.</p> <p>Governance Outcome Faktor-faktor positif aspek <i>governance outcome</i> Rencana Strategis Bank adalah:</p> <ul style="list-style-type: none"> Bank senantiasa melakukan investasi dalam pengembangan SDM, IT, jaringan kantor, kebijakan dan prosedur dalam rangka meningkatkan pelayanan kepada nasabah maupun peningkatan kualitas keamanan. Rencana Bisnis Bank telah menggambarkan pertumbuhan Bank yang berkesinambungan dan sesuai dengan visi dan misi Bank. Rencana bisnis yang lengkap dan realistis dengan memperhatikan seluruh faktor eksternal dan faktor internal serta memperhatikan prinsip kehati-hatian dan asas perbankan yang sehat. Rencana Korporasi dan Rencana Bisnis disusun oleh Direksi dan telah disetujui oleh Dewan Komisaris Realisasi Rencana Bisnis Bank pada Semester II 2024 pada dasarnya secara keseluruhan dinilai cukup baik, disaat pemulihan ekonomi nasional masih berlanjut di tengah situasi ekonomi global yang semakin menantang, baik karena tekanan inflasi dunia, pengetatan kebijakan moneter eksternal dan internal, serta konflik perang antar negara yang berkepanjangan. Realisasi pertumbuhan CAR sebesar 28,93%, tercapai lebih tinggi dari target yang sebesar 22,89%. Realisasi rasio NIM per posisi akhir Desember 2024 dicapai pada angka 5,04% lebih tinggi dari anggaran yang sebesar 4,83%, terdapat deviasi positif sebesar 0,21%. Bank telah menyampaikan Rencana Aksi Pemulihan (<i>Recovery Plan</i>) kepada OJK melalui Sistem Pelaporan OJK (SIPENA) berdasarkan Surat Nomor 09/724/BSS/DIR/XI/2024 tanggal 28 November 2024 sesuai dengan yang dipersyaratkan dalam POJK No. 5 Tahun 2024 tentang Penetapan Status Pengawasan dan Penanganan Permasalahan Bank Umum. 		<p>Governance Structure <i>Positive factors in the governance structure aspect of the Bank's Strategic Plan include:</i></p> <ul style="list-style-type: none"> <i>The Bank's Strategic Plan is outlined in the RBB and is in line with the Bank's Vision and Mission;</i> <i>Several actions related to employee capacity development through training certified by the Financial Services Authority have been carried out as per the Sustainable Finance Action Plan (RAKB); and</i> <i>Shareholders consistently support the RBB by strengthening capital.</i> <p><i>There are no negative factors in the governance structure aspect of the Bank's Strategic Plan.</i></p> <p>Governance Process <i>Positive factors in the governance process aspect of the Bank's Strategic Plan include:</i></p> <ul style="list-style-type: none"> <i>The Bank has prepared a complete and realistic RBB, taking into account all external and internal factors while observing the prudential principle and sound banking principles;</i> <i>The Board of Directors has communicated the RBB by presenting it to the Bank's Shareholders. The Board of Directors also presents the RBB to all Division Heads through the Board of Directors Meetings with the Division Heads, who will then convey it to their subordinates;</i> <i>The Board of Commissioners supervises the implementation of the RBB through regular monthly joint meetings of the Board of Commissioners and the Board of Directors and directly conveys several concerns to the Board of Directors for further explanation; and</i> <i>The Bank's Shareholders show seriousness in supporting the RBB.</i> <p><i>There are no negative factors in the governance process aspect of the Bank's Strategic Plan.</i></p> <p>Governance Outcome <i>Positive factors in the governance outcome aspect of the Bank's Strategic Plan include:</i></p> <ul style="list-style-type: none"> <i>The Bank consistently invests in the development of human resources, IT, office networks, policies, and procedures in order to improve service to customers and enhance security quality;</i> <i>The RBB has depicted the Bank's sustainable growth that is in line with the Bank's Vision and Mission;</i> <i>A complete and realistic business plan that takes into account all external and internal factors, as well as observes the prudential principle and sound banking principles;</i> <i>The Corporate Plan and Business Plan are prepared by the Board of Directors and have been approved by the Board of Commissioners;</i> <i>The realization of the Bank's Business Plan in the second semester of 2024 was basically overall considered quite good, while the national economic recovery continued in the midst of an increasingly challenging global economic situation, both due to world inflationary pressures, external and internal monetary policy tightening, and prolonged war conflicts between countries. Realized CAR growth of 28.93%, higher than the target of 22.89%.</i> <i>The realization of NIM ratio as of the end of December 2024 was achieved at 5.04% higher than the budget of 4.83%, there was a positive deviation of 0.21%.</i> <i>The Bank has submitted a Recovery Plan to OJK through the OJK Reporting System (SIPENA) based on Letter Number 09/724/BSS/DIR/XI/2024 dated November 28, 2024 as required by POJK No. 5 of 2024 concerning Determination of Supervisory Status and Handling of Commercial Bank Problems.</i> 	

Aspek Aspect	Rencana Strategis Bank Bank's Strategic Plans	Nilai Score	2
Analisis Analysis			
<p>Faktor-faktor negatif aspek <i>governance outcome</i> Rencana Strategis Bank adalah:</p> <ul style="list-style-type: none"> Realisasi rasio BOPO dicapai pada angka 95,98% sedikit lebih tinggi dari <i>target</i> sebesar 93,53%. ROE sebesar 0,56%, tercapai lebih rendah dari target yang sebesar 2,14%, serta ROA sebesar 0,24%, tercapai lebih rendah dari target yang sebesar 0,51%. Beberapa realisasi rasio dicapai lebih rendah dari anggaran, diantaranya: <ul style="list-style-type: none"> Rasio beban <i>overhead</i> terhadap pendapatan bersih kegiatan utama sebesar 69,54%, tercapai lebih tinggi dari anggaran yang sebesar 70,72%, terdapat deviasi positif sebesar 1,18%. Realisasi rasio debitur inti terhadap total kredit sebesar 35,38% dibandingkan anggaran sebesar 30,90%, terdapat deviasi negatif sebesar 4,48%. Realisasi rasio deposito inti terhadap total DPK sebesar 45,20%. Dibandingkan dengan anggaran sebesar 43,52%, terdapat deviasi negatif sebesar 1,68%. 		<p>Negative factors of <i>governance outcome</i> aspects of the Bank's Strategic Plan are:</p> <ul style="list-style-type: none"> BOPO ratio realization was achieved at 95.98% slightly higher than the target of 93.53%. ROE of 0.56%, achieved lower than the target of 2.14%, and ROA of 0.24%, achieved lower than the target of 0.51%. Several ratio realizations were achieved lower than the budget, including: <ul style="list-style-type: none"> The ratio of overhead costs to net income of main activities was 69.54%, achieved higher than the budget of 70.72%, there was a positive deviation of 1.18%. Realization of the ratio of core debtors to total credit was 35.38% compared to the budget of 30.90%, there was a negative deviation of 4.48%. Realization of the ratio of core depositors to total DPK was 45.20%. Compared to the budget of 43.52%, there was a negative deviation of 1.68%. 	

Aspek Aspect	Aspek Pemegang Saham Shareholder Aspect	Nilai Score	1
Analisis Analysis			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Aspek Pemegang saham adalah: Pemegang Saham Bank berkomitmen memenuhi Peraturan Otoritas Jasa Keuangan dan peraturan perundangan terkait lainnya serta memastikan Bank menjalankan kegiatan usaha dengan mematuhi ketentuan yang berlaku</p> <p>Tidak terdapat faktor negatif aspek <i>governance structure</i> Aspek Pemegang Saham</p> <p>Governance Process Faktor-faktor positif aspek <i>governance process</i> Aspek Pemegang Saham adalah:</p> <ul style="list-style-type: none"> Pemegang Saham Pengendali (PSP) Bank senantiasa berkomitmen untuk memenuhi ketentuan yang berlaku dalam mendukung bisnis Bank Bank mematuhi ketentuan yang berlaku sebelum melakukan Penyertaan Modal Penyertaan Modal oleh Bank kepada pihak ketiga dilakukan dengan analisa dan pertimbangan yang matang, serta dikomunikasikan dan dimintakan persetujuan terlebih dahulu kepada pengawas Bank Penyertaan modal dilaksanakan dengan memperhatikan tata kelola yang baik dan penerapan manajemen risiko <p>Tidak terdapat faktor negatif aspek <i>governance process</i> Aspek Pemegang Saham</p> <p>Governance Outcome Faktor-faktor positif aspek <i>governance outcome</i> Aspek Pemegang Saham adalah:</p> <ul style="list-style-type: none"> Bank tidak melakukan kegiatan aksi korporasi penggabungan, peleburan, pengambilalihan, integrasi, dan transaksi material lain Bank tidak melakukan pembagian dividen <p>Tidak terdapat faktor negatif aspek <i>governance outcome</i> Aspek Pemegang Saham</p>		<p>Governance Structure Positive factors in the <i>governance structure</i> aspect of the Shareholder aspect include: The Bank's Shareholders are committed to complying with the Financial Services Authority regulations and other relevant laws and regulations and ensuring that the Bank conducts business activities in compliance with applicable regulations.</p> <p>There are no negative factors in the <i>governance structure</i> aspect Shareholder Aspect</p> <p>Governance Process Positive factors in the <i>governance process</i> aspect of the Shareholder aspect include:</p> <ul style="list-style-type: none"> The Bank's Controlling Shareholders (PSP) are always committed to complying with the applicable regulations in supporting the Bank's business; The Bank complies with the applicable regulations before making Equity Participation; Equity participation by the Bank to third parties is carried out with thorough analysis and consideration and is communicated and requested for approval in advance to the Bank's supervisor; and Equity participation is carried out by taking into account good corporate governance and the implementation of risk management. <p>There are no negative factors in the <i>governance process</i> aspect of the Shareholder aspect.</p> <p>Governance Outcome Positive factors in the <i>governance outcome</i> aspect of the Shareholder aspect include:</p> <ul style="list-style-type: none"> No corporate actions such as mergers, consolidations, takeovers, integrations, and other material transactions; and No distribution of dividends. <p>There are no negative factors in the <i>governance outcome</i> aspect of the Shareholder aspect.</p>	

Aspek <i>Aspect</i>	Penerapan Strategi Anti-Fraud, termasuk Anti Penyuapan <i>Implementation of Anti-fraud Strategies, including Anti-Bribery</i>	Nilai <i>Score</i>	2
Analisis <i>Analysis</i>			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Penerapan Strategi Anti Fraud termasuk anti penyuapan adalah:</p> <ul style="list-style-type: none"> Bank telah memiliki unit kerja <i>Anti Fraud & Investigation</i> serta pejabat yang membawahi fungsi penerapan Strategi anti <i>fraud</i> Bank telah memiliki struktur organisasi <i>Anti Fraud & Investigation</i> yang melapor langsung ke <i>President Director</i> dan memiliki hubungan komunikasi dan pelaporan secara langsung kepada Dewan Komisaris. Bank telah memiliki pejabat yang membawahi fungsi penerapan Strategi anti <i>fraud</i>, yang memiliki pengalaman yang memadai di bidang perbankan. <p>Faktor-faktor negatif aspek <i>governance structure</i> Penerapan Strategi Anti Fraud adalah :</p> <ul style="list-style-type: none"> Petugas <i>Anti Fraud</i> yang berfungsi menangani penerapan Strategi <i>Anti Fraud</i> saat ini masih dalam proses sertifikasi keahlian di bidang <i>Anti Fraud</i>. <p>Governance Process: Faktor-faktor positif aspek <i>governance process</i> Penerapan Strategi Anti Fraud termasuk anti penyuapan adalah:</p> <ul style="list-style-type: none"> Dalam pelaksanaan proses penerapan strategi <i>Anti-Fraud</i> termasuk anti penyuapan bank telah memiliki kebijakan Strategi <i>Anti Fraud</i> nomor BSS/KK-SAF/AFM/02 dan memo yang mengatur mengenai penegasan pelaksanaan <i>Assessment</i> Anti Suap dan Korupsi Memo nomor 09/13/MI/SKMR/VII/21. Pemegang Saham BSS berkomitmen mendukung permodalan bank yang sehat dan senantiasa menjaga kesinambungan usaha bank. Selain itu pemegang saham pengendali BSS tidak melakukan tindakan yang dapat menyebabkan Bank terpapar risiko. <p>Tidak terdapat faktor negatif atas <i>governance process</i> terhadap Penerapan Strategi antri fraud termasuk anti penyuapan.</p> <p>Governance Outcome: Faktor-faktor positif aspek <i>governance outcome</i> Penerapan Strategi Anti Fraud termasuk anti penyuapan adalah: Bank telah menyampaikan secara rutin kepada OJK melalui sistem Apolo terkait:</p> <ul style="list-style-type: none"> Laporan penerapan Strategi <i>Anti Fraud</i> tiap Semester dan/atau jika terdapat koreksi laporan maupun perubahannya telah disusun sesuai, dengan ketentuan Regulator terkait dan telah disampaikan sebelum batas waktu yang ditetapkan. Laporan <i>Fraud</i> berdampak signifikan dan/atau jika terdapat koreksi laporan telah disusun sesuai dengan ketentuan Regulator terkait dan telah disampaikan sebelum batas waktu yang ditetapkan. Pada periode semester II tahun 2024 terdapat 2 kasus <i>Fraud</i> berdampak signifikan yang telah disampaikan kepada OJK melalui sistem Apolo dengan surat nomor 09/560/BSS/DIR/IX/2024 tanggal 10 September 2024 Pada periode semester II tahun 2024 terdapat pengkinian Strategi <i>Anti Fraud</i> dengan nomor BSS/KK-SAF/AFM/02 yang telah dikirimkan langsung kepada OJK berdasarkan surat nomor 09/714/BSS/DIR/XI/24 tanggal 22 November 2024 <p>Tidak terdapat faktor negatif atas <i>governance outcome</i> terhadap Penerapan Strategi <i>anti fraud</i> termasuk anti penyuapan</p>	<p>Governance Structure <i>Positive factors in the governance structure aspect of implementing an anti-fraud strategy:</i></p> <ul style="list-style-type: none"> <i>The Bank has an Anti-Fraud & Investigation unit and officers overseeing the implementation of the anti-fraud strategy;</i> <i>The Bank has an Anti-Fraud & Investigation organizational structure that reports directly to the President Director and directly communicates and reports to the Board of Commissioners; and</i> <i>The Bank has officers overseeing the implementation of the anti-fraud strategy who have adequate experience in banking.</i> <p><i>Negative factors in the governance structure aspect of the Anti Fraud Strategy Implementation are:</i></p> <ul style="list-style-type: none"> <i>The Anti Fraud Officer who functions to handle the implementation of the Anti Fraud Strategy is currently still in the process of certifying expertise in the field of Anti Fraud.</i> <p>Governance Process <i>Positive factors in the governance process aspect of implementing an anti-fraud strategy:</i></p> <ul style="list-style-type: none"> <i>In the implementation process of the anti-fraud strategy, the Bank has an Anti-Fraud Strategy Policy No. BSS/KK-SAF/ADT/02 and a memo regulating the affirmation of the implementation of the Anti-Bribery and Corruption Assessment No. 09/13/MI/SKMR/VII/21.</i> <i>Pemegang Saham BSS berkomitmen mendukung permodalan bank yang sehat dan senantiasa menjaga kesinambungan usaha bank. Selain itu pemegang saham pengendali BSS tidak melakukan tindakan yang dapat menyebabkan Bank terpapar risiko.</i> <p><i>There are no negative factors in the governance process aspect of implementing an anti-fraud strategy, including anti-bribery.</i></p> <p>Governance Outcome <i>Positive factors in the governance outcome aspect of implementing an anti-fraud strategy:</i> <i>The Bank has regularly submitted the following reports to the Financial Services Authority through the Financial Services Authority Reporting System (APOLO):</i></p> <ul style="list-style-type: none"> <i>The semi-annual Anti-Fraud Strategy Implementation Report and/or corrections or changes to the report have been prepared in accordance with the relevant regulatory provisions and have been submitted before the set deadline; and</i> <i>Significant Impact Fraud Reports and/or corrections to the report have been prepared in accordance with the relevant regulatory provisions and have been submitted before the set deadline.</i> <i>In the second semester period of 2024, there were 2 cases of Fraud with a significant impact that had been submitted to OJK through the Apolo system with letter number 09/560/BSS/DIR/IX/2024 dated September 10, 2024.</i> <i>In the second semester period of 2024, there was an update of the Anti Fraud Strategy with the number BSS/KK-SAF/AFM/02 which was sent directly to OJK based on letter number 09/714/BSS/DIR/XI/24 dated November 22, 2024.</i> <p><i>There are no negative factors in the governance outcome aspect of implementing an anti-fraud strategy, including anti-bribery.</i></p>		

Aspek <i>Aspect</i>	Penerapan Keuangan Berkelanjutan <i>Implementation of Sustainable Finance</i>	Nilai Score	1
Analisis <i>Analysis</i>			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Penerapan Keuangan berkelanjutan adalah: Menetapkan program RAKB yang akan dilaksanakan dalam jangka panjang yaitu 5 (lima) tahun dan jangka pendek yaitu 1 (satu) tahun</p> <p>Tidak ada faktor negatif aspek <i>governance structure</i> Penerapan Keuangan berkelanjutan</p> <p>Governance Process Faktor-faktor positif aspek <i>governance process</i> Penerapan Keuangan berkelanjutan adalah:</p> <ul style="list-style-type: none"> • Pelaksanaan rencana aksi keuangan sesuai ketentuan dari Regulasi yang ditetapkan. • Pelaksanaan program Keuangan Berkelanjutan diterapkan dengan prinsip-prinsip yang diatur dalam aturan regulator diantara sesuai prinsip tata kelola yang baik • Rencana Aksi Keuangan Berkelanjutan telah dikomunikasikan kepada pihak yang terkait • Tanggung jawab sosial dan lingkungan dalam mendukung kegiatan penerapan keuangan berkelanjutan, telah disalurkan dalam bentuk dana CSR dalam berbagai kegiatan <p>Tidak ada faktor negatif aspek <i>governance Process</i> Penerapan Keuangan berkelanjutan.</p> <p>Governance Outcome Faktor-faktor positif aspek <i>governance outcome</i> Penerapan Keuangan berkelanjutan adalah:</p> <ul style="list-style-type: none"> • Bank telah melakukan publikasi untuk Laporan Berkelanjutan pada situs web Bank secara tepat waktu. • Laporan rencana aksi keuangan berkelanjutan telah disampaikan sesuai ketentuan regulator • Pengalokasian dana Tanggung Jawab Sosial dan Lingkungan (TJSL) telah dituangkan dalam Laporan rencana aksi keuangan berkelanjutan <p>Tidak ada faktor negatif aspek <i>governance Outcome</i> Penerapan Keuangan berkelanjutan.</p>	<p>Governance Structure <i>Positive factors in the governance structure aspect of the implementation of sustainable finance:</i> <i>The Bank has established a Long-Term (5 years) and Short-Term (1 year) Sustainable Finance Action Plan (RAKB).</i></p> <p><i>There are no negative factors in the governance structure aspect of the implementation of sustainable finance.</i></p> <p>Governance Process <i>Positive factors in the governance process aspect of the implementation of sustainable finance:</i></p> <ul style="list-style-type: none"> • <i>The implementation of the finance action plan is in accordance with the regulations;</i> • <i>The implementation of the Sustainable Finance Program is carried out in accordance with principles regulated in the regulations, including good corporate governance principles;</i> • <i>The RAKB has been communicated to the relevant parties; and</i> • <i>Social and environmental responsibility in supporting the implementation of sustainable finance has been channeled in the form of corporate social responsibility (CSR) funds in various activities.</i> <p><i>There are no negative factors in the governance process aspect of sustainable finance implementation.</i></p> <p>Governance Outcome <i>Positive factors in the governance outcome aspect of the implementation of sustainable finance:</i></p> <ul style="list-style-type: none"> • <i>The Bank has published its Sustainability Report on the Bank's website in a timely manner;</i> • <i>The RAKB report has been submitted in accordance with the regulators' provisions; and</i> • <i>The allocation of environmental responsibility funds has been outlined in the RAKB Report.</i> <p><i>There were no negative factors on the governance outcome aspect of implementing sustainable finance.</i></p>		

Aspek <i>Aspect</i>	Penerapan Tata Kelola dalam Kelompok Usaha Bank <i>Implementation of Corporate Governance within the Bank's Business Group</i>	Nilai Score	1
Analisis <i>Analysis</i>			
<p>Governance Structure Faktor-faktor positif aspek <i>governance structure</i> Penerapan Tata Kelola Dalam Kelompok Usaha Bank adalah: Bank telah memiliki pedoman dan tata tertib kerja Dewan Komisaris yang sesuai dengan POJK no 17 Tahun 2023</p> <p>Tidak terdapat faktor negatif aspek <i>governance structure</i> dalam Penerapan Tata Kelola Dalam Kelompok Usaha Bank.</p> <p>Governance Process Faktor-faktor positif aspek <i>governance process</i> Penerapan Tata Kelola Dalam Kelompok Usaha Bank adalah: Bank bukan sebagai perusahaan induk maupun sebagai anggota kelompok usaha Bank, sehingga tidak terdapat faktor positif dalam Penerapan Tata Kelola Dalam Kelompok Usaha Bank</p> <p>Faktor-faktor negatif aspek <i>governance process</i> Penerapan Tata Kelola Dalam Kelompok Usaha Bank adalah: Bank bukan sebagai perusahaan induk maupun sebagai anggota kelompok usaha Bank, sehingga tidak terdapat faktor negatif dalam Penerapan Tata Kelola Dalam Kelompok Usaha Bank</p> <p>Governance Outcome Faktor-faktor positif aspek <i>governance outcome</i> Penerapan Tata Kelola Dalam Kelompok Usaha Bank adalah: Bank bukan sebagai perusahaan induk maupun sebagai anggota kelompok usaha Bank, sehingga tidak terdapat faktor positif dalam Penerapan Tata Kelola Dalam Kelompok Usaha Bank</p> <p>Faktor-faktor negatif aspek <i>governance outcome</i> Penerapan Tata Kelola Dalam Kelompok Usaha Bank adalah: Bank bukan sebagai perusahaan induk maupun sebagai anggota kelompok usaha Bank, sehingga tidak terdapat faktor negatif dalam Penerapan Tata Kelola Dalam Kelompok Usaha Bank</p>	<p>Governance Structure <i>Positive factors in the governance structure aspect of corporate governance implementation within the Bank's business group:</i> <i>The Bank has established a Board Manual of the Board of Commissioners in accordance with Financial Services Authority Regulation No. 17 of 2023.</i></p> <p><i>There are no negative factors in the governance structure aspect of corporate governance implementation within the Bank's business group.</i></p> <p>Governance Process <i>Positive factors in the governance process aspect of the Implementation of Governance in the Bank Group are:</i> <i>The Bank is neither a holding company nor a member of the Bank's business group, so there are no positive factors in the Implementation of Governance in the Bank's Business Group.</i></p> <p><i>Negative factors in the governance process aspect of the Implementation of Governance in the Bank's Business Group are:</i> <i>The Bank is neither a holding company nor a member of the Bank's business group, so there are no negative factors in the Implementation of Governance in the Bank's Business Group.</i></p> <p>Governance Outcome <i>Positive factors in the governance outcome aspect of the Implementation of Governance in the Bank Group are:</i> <i>The Bank is neither a holding company nor a member of the Bank's business group, so there are no positive factors in the Implementation of Governance in the Bank's Business Group.</i></p> <p><i>Negative factors in the governance outcome aspect of corporate governance implementation within the Bank's business group:</i> <i>The Bank is not a holding company and does not have a business group; therefore, there are no negative factors.</i></p>		

Rapat Umum Pemegang Saham

General Meeting of Shareholders

Rapat Umum Pemegang Saham (RUPS) merupakan organ tertinggi dalam struktur GCG Bank Sahabat Sampoerna yang berfungsi sebagai pengambil keputusan tertinggi dalam Bank, dan memiliki wewenang yang tidak dimiliki oleh Dewan Komisaris ataupun Direksi. RUPS juga merupakan sarana bagi para pemegang saham untuk mengambil keputusan penting dan strategis terkait keberlanjutan jangka panjang Bank, dengan memperhatikan ketentuan Anggaran Dasar dan peraturan perundang-undangan yang berlaku, termasuk menyetujui perubahan Anggaran Dasar, menyetujui laporan tahunan dan membagikan dividen. RUPS juga memiliki wewenang untuk menunjuk dan memberhentikan anggota Dewan Komisaris dan Direksi, mendelegasikan wewenang kepada Dewan Komisaris dan Direksi serta mengambil keputusan terkait tindakan Bank yang membutuhkan persetujuan pemegang saham.

Pelaksanaan RUPS di Bank berpedoman pada Undang-Undang Republik Indonesia Nomor 40 Tahun 2007 tentang Perseroan Terbatas dan Pasal 8 Anggaran Dasar Bank. Pelaksanaan RUPS terbagi atas 2 (dua) jenis, yaitu RUPS Tahunan dan RUPS Luar Biasa. RUPS Tahunan diselenggarakan minimal setahun sekali atau paling kurang 6 bulan sejak tahun buku berakhir. Sementara, RUPS Luar Biasa diselenggarakan untuk membahas hal-hal penting dan mendesak dengan waktu pelaksanaan menyesuaikan dengan kebutuhan Pemegang Saham, Dewan Komisaris, ataupun Direksi Bank.

Hak dan Wewenang RUPS

RUPS mempunyai hak dan wewenang yang terdiri dari:

1. Menyetujui dan menerima Laporan Tahunan dari Direksi Bank yang telah dikaji oleh Dewan Komisaris;
2. Memutuskan penggunaan laba Bank;
3. Memberikan pelunasan dan pembebasan tanggung jawab penuh kepada anggota Dewan Komisaris dan Direksi atas pengelolaan dan pengawasan yang dijalankan selama tahun buku yang berlaku;
4. Menunjuk dan mengangkat Dewan Komisaris dan Direksi;
5. Memberikan persetujuan jika perusahaan bermaksud untuk mengalihkan, melepaskan hak, atau menjadikan jaminan utang seluruh atau lebih dari 50% harta kekayaan bersih Bank, baik dalam satu transaksi dan/atau beberapa transaksi yang berdiri sendiri atau yang berkaitan satu sama lain;
6. Menyetujui pemindahan atas saham Bank; dan
7. Menyetujui perubahan Anggaran Dasar.

The General Meeting of Shareholders (GMS) is the highest authority in the GCG structure of Bank Sahabat Sampoerna which functions as the highest decision maker in the Bank, and has authority that is not possessed by the Board of Commissioners or the Board of Directors. The GMS is also a means for shareholders to make important and strategic decisions related to the long-term sustainability of the Bank, by taking into account the provisions of the Articles of Association and applicable laws and regulations, including approving changes to the Articles of Association, approving annual reports and distributing dividends. The GMS also has the authority to appoint and dismiss members of the Board of Commissioners and Board of Directors, delegate authority to the Board of Commissioners and Board of Directors and make decisions related to Bank actions that require shareholder approval.

The implementation of GMS, the Banks adheres with the Law of the Republic of Indonesia Number 40 of 2007 concerning Limited Liability Companies and Article 8 of the Bank's Articles of Association. The GMS is divided into two types: the Annual GMS and the Extraordinary GMS. The Annual GMS is held at least once a year or at least 6 months after the end of the financial year. On the other hand, the Extraordinary GMS is held to discuss urgent and significant matters, with the timing adjusted according to the needs of the Bank's Shareholders, Board of Commissioners, or Board of Directors.

Rights and Authority of the GMS

The GMS has rights and authority consisting of:

1. *To approve and accept Annual Reports from the Board of Directors of the Bank, which have been reviewed by the Board of Commissioners;*
2. *To decide the appropriation of the Bank's profits;*
3. *To give full discharge and release of responsibility to members of the Board of Commissioners and Board of Directors for the management and supervision performed during the applicable financial year;*
4. *To designate and appoint Board of Commissioners and Board of Directors;*
5. *To give approval if the Company intends to transfer, release rights, or pledge all or more than 50% of the Bank's net assets in one and/or several independent or dependent transactions;*
6. *To approve transfers of Bank shares; and*
7. *To approve amendments to the Articles of Association.*

Hak, Tanggung Jawab, dan Wewenang Pemegang Saham

Hak Pemegang Saham

Hak Pemegang Saham dalam pelaksanaan RUPS, terdiri dari:

1. Menghadiri dan memiliki hak suara dalam RUPS;
2. Menerima pembayaran dividen dan sisa kekayaan hasil likuidasi;
3. Mengangkat dan memberhentikan anggota Dewan Komisaris dan Direksi;
4. Memberikan persetujuan atas Laporan Tahunan dan Keuangan yang disampaikan oleh Direksi dan Laporan Pengawasan yang disampaikan oleh Dewan Komisaris, serta memberikan pembebasan dan pelunasan kepada Dewan Komisaris dan Direksi sepanjang tindakannya tercermin dan dilaporkan dalam Laporan Tahunan dan Keuangan;
5. Memindahkan hak atas saham yang dimiliki; dan
6. Mendapatkan penawaran atas saham yang akan dialihkan oleh Pemegang Saham lainnya.

Tanggung Jawab Pemegang Saham

Pemegang Saham memiliki tanggung jawab untuk:

1. Meminta pertanggungjawaban dari Dewan Komisaris dan Direksi atas pengawasan dan pengurusan yang dilakukan terhadap Bank; dan
2. Bertanggung jawab sebesar dana yang telah ditempatkan dalam Bank, jika Bank mengalami kepailitan.

Wewenang Pemegang Saham

Pemegang Saham memiliki kewenangan, antara lain:

1. Mengangkat dan memberhentikan Dewan Komisaris dan Direksi.
2. Memberikan persetujuan atas Laporan Tahunan dan Keuangan yang disampaikan oleh Direksi dan Laporan Pengawasan yang disampaikan oleh Dewan Komisaris, serta memberikan pembebasan dan pelunasan kepada Dewan Komisaris dan Direksi sepanjang tindakannya tercermin dan dilaporkan dalam Laporan Tahunan dan Laporan Keuangan.
3. Memberikan persetujuan atas pengalihan atau penjaminan atas 50% lebih aset kekayaan Bank.
4. Memberikan persetujuan atas pengalihan saham Pemegang Saham.
5. Memberikan persetujuan atas proses merger, akuisisi, dan likuidasi yang dilakukan Bank.
6. Menyetujui pembagian dividen.
7. Menyetujui jumlah remunerasi Dewan Komisaris dan Direksi.

Shareholders' Rights, Responsibilities, and Authority

Shareholders' Rights

The rights of Shareholders in the GMS include:

1. Attend and have voting rights at the GMS;
2. Receive dividend payments and the remaining proceeds of asset liquidation;
3. Appoint and dismiss members of the Board of Commissioners and the Board of Directors;
4. Approve the Annual Reports and Financial Statements submitted by the Board of Directors and Supervision Reports submitted by the Board of Commissioners, as well as provide release and discharge to the Board of Commissioners and the Board of Directors provided that their actions are reflected and reported in the Annual Reports and Financial Statements;
5. Transfer rights over shares owned; and
6. Receive an offer on shares to be transferred by other Shareholders.

Shareholders' Responsibilities

Shareholders are responsible for:

1. Asking for accountability from the Board of Commissioners and the Board of Directors for the supervision and management of the Bank; and
2. Being responsible for the amount of funds issued in the Bank, if the Bank goes bankrupt.

Shareholders' Authority

The Bank has established the authority for each Shareholder, as follows.

1. To appoint and dismiss the Board of Commissioners and the Board of Directors.
2. To approve the Annual Reports and Financial Statements submitted by the Board of Directors and Supervision Reports submitted by the Board of Commissioners, as well as to provide release and discharge to the Board of Commissioners and the Board of Directors provided that their actions are reflected and reported in the Annual Reports and Financial Statements.
3. To approve the transfer or the pledge of 50% or more of the Bank's assets.
4. To approve the transfer of Shareholders' shares.
5. To approve the merger, acquisition, and liquidation process conducted by the Bank.
6. To approve dividend distribution.
7. To approve the remuneration amount for the Board of Commissioners and the Board of Directors.

Mekanisme Pelaksanaan RUPS

Bank Sahabat Sampoerna melaksanakan RUPS sesuai dengan ketentuan Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas, di mana Pemegang saham dapat mengambil keputusan yang mengikat di luar RUPS dengan syarat semua Pemegang Saham dengan hak suara menyetujui secara tertulis dengan menandatangani usul yang bersangkutan atau biasa disebut Keputusan Sirkuler.

Pelaksanaan RUPS Tahun 2024

Sepanjang tahun 2024, Bank Sahabat Sampoerna telah menyelenggarakan RUPS sebanyak 2 (dua) kali yang terdiri dari 1 (satu) kali RUPS Tahunan pada tanggal 24 Juni 2024 dan RUPS Luar Biasa sebanyak 1 (satu) kali pada tanggal 26 Maret 2024. Seluruh RUPS Bank dilakukan secara sirkuler dan telah ditandatangani oleh seluruh Pemegang Saham. Masing-masing RUPS yang dilakukan oleh Bank diuraikan sebagai berikut:

RUPS Tahunan 2024

Bank Sahabat Sampoerna menyelenggarakan RUPS Tahunan secara sirkuler dan ditandatangani oleh seluruh Pemegang Saham yang mewakili 1.690.302.571 saham atau 100% dari seluruh saham yang ditempatkan dan disetor penuh sehingga ketentuan kuorum RUPS pada Pasal 10 Anggaran Dasar telah terpenuhi. Pelaksanaan RUPS Tahunan ini telah dicatatkan dalam Akta Notaris No. 26 tanggal 16 Juli 2024. Adapun keputusan dan realisasi RUPS Tahunan 2024 adalah sebagai berikut:

GMS Mechanism

The implementation of Bank Sahabat Sampoerna's GMS is guided by Law no. 40 of 2007 on Limited Liability Companies, in which shareholders can make binding decisions outside GMS, provided that all Shareholders with voting rights agree in writing by signing the relevant proposal or usually called as Circular Resolutions.

Implementation of 2024 GMS

Throughout 2024, Bank Sahabat Sampoerna has held 2 (two) GMS consisting of 1 (one) Annual GMS on June 24, 2024 and 1 (one) Extraordinary GMS on March 26, 2024. All of the Bank's GMS were conducted circularly and have been signed by all Shareholders. Each GMS conducted by the Bank is described as follows:

2024 Annual GMS

Bank Sahabat Sampoerna held an Annual GMS circularly and was signed by all Shareholders representing 1,690,302,571 shares or 100% of all issued and fully paid shares so that the GMS quorum provisions in Article 10 of the Articles of Association have been met. The implementation of this Annual GMS has been recorded in Notarial Deed No. 26 dated July 16, 2024. The decisions and realization of the 2024 Annual GMS are as follows:

Agenda <i>Agenda</i>	Keputusan RUPS <i>GMS Resolutions</i>	Realisasi <i>Realization</i>
Agenda I <i>Agenda – item I</i>	Menerima dan menyetujui Laporan Direksi Perseroan mengenai hasil kegiatan usaha Perseroan untuk tahun buku yang berakhir pada tanggal 31-12-2023 (tiga puluh satu Desember dua ribu dua puluh tiga). <i>Accepting and approving the Company's Board of Directors' Report on the results of Bank Sahabat Sampoerna's business activities for the financial year ending on December 31, 2023</i>	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions.</i>
Agenda II <i>Agenda – item II</i>	Menerima dan menyetujui Laporan Dewan Komisaris Perseroan mengenai tugas pengawasan terhadap Perseroan untuk tahun buku yang berakhir pada tanggal 31-12-2023 (tiga puluh satu Desember dua ribu dua puluh tiga). <i>Accepting and approving the Company's Board of Commissioners' Report on the supervisory duties over Bank Sahabat Sampoerna for the financial year ending on December 31, 2023</i>	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions.</i>
Agenda III <i>Agenda – item III</i>	Menyetujui dan mengesahkan Laporan Tahunan Perseroan termasuk Laporan Keuangan untuk tahun buku yang berakhir pada tanggal 31-12-2023 (tiga puluh satu Desember dua ribu dua puluh tiga) yang telah diaudit oleh Kantor Akuntan Publik TANUBRATA SUTANTO FAHMI BAMBANG, dan REKAN dan menerima seluruh pertanggungjawaban Direksi dan Dewan Komisaris Perseroan serta membebaskan Direksi dan Dewan Komisaris Perseroan dari segala tanggung jawabnya menurut hukum dalam mengurus dan menjalankan Perseroan ("acquit et de charge") selama tahun buku 2023 (dua ribu dua puluh tiga) sejauh tindakan tersebut tercantum dalam Laporan Tahunan Perseroan serta tidak melanggar ketentuan peraturan dan perundangan yang berlaku. <i>Approving and ratifying the Annual Report of Bank Sahabat Sampoerna, including the Financial Statements for the financial year ending on December 31, 2023, which has been audited by the Public Accounting Firm TANUBRATA SUTANTO FAHMI BAMBANG & REKAN, and accepting all accountability of the Board of Directors and the Board of Commissioners of Bank Sahabat Sampoerna, as well as releasing the Board of Directors and the Board of Commissioners of Bank Sahabat Sampoerna from all their legal responsibilities in managing and operating Bank Sahabat Sampoerna (Acquit et de charge) during the 2023 financial year provided these actions are included in the Annual Report of Bank Sahabat Sampoerna and do not violate the provisions of applicable laws and regulations.</i>	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions.</i>

Agenda <i>Agenda</i>	Keputusan RUPS <i>GMS Resolutions</i>	Realisasi <i>Realization</i>
Agenda IV <i>Agenda – item IV</i>	Menyetujui usulan Direksi untuk menetapkan seluruh keuntungan yang diperoleh Perseroan pada tahun buku 2023 (dua ribu dua puluh tiga) sebagai Laba Ditahan (<i>Retained Earning</i>). <i>Approving the proposal of the Board of Directors to designate all profits earned by Bank Sahabat Sampoerna in the 2023 financial year as retained earnings.</i>	
Agenda V <i>Agenda – item V</i>	Menerima usulan Direksi untuk meningkatkan dana cadangan umum dari laba tahun buku 2023 (dua ribu dua puluh tiga). <i>Accepting the proposal of the Board of Directors to increase the general reserves from the 2023 financial year profits.</i>	
Agenda VI <i>Agenda – item VI</i>	Menyetujui untuk memberikan kewenangan kepada Dewan Komisaris untuk mendapatkan paket remunerasi anggota Direksi dan Dewan Komisaris. <i>Approving to grant authority to the Board of Commissioners to determine the remuneration package for members of the Board of Directors and the Board of Commissioners.</i>	
Agenda VII <i>Agenda – item VII</i>	Menyetujui untuk memberikan kewenangan kepada Dewan Komisaris untuk menunjuk Jasa Kantor Akuntan Publik yang akan digunakan sebagai Akuntan Publik Perseroan untuk tahun buku 2024 (dua ribu dua puluh empat), semata-mata dikarenakan Para Pemegang Saham Perseroan beranggapan Dewan Komisaris mengetahui dengan baik mengenai Perseroan karena meakukan tugas pengawasan terhadap jalannya kegiatan Perseroan. <i>Approving the granting of authority to the Board of Commissioners to appoint a public accounting firm as the Bank's public accountant for the 2024 financial year, solely because the Shareholders believe that the Board of Commissioners has a good understanding of the Bank due to their supervisory duties over the Bank's business activities.</i>	

RUPS Luar Biasa 26 Maret 2024

Bank Sahabat Sampoerna menyelenggarakan RUPS Luar Biasa secara sirkuler dan ditandatangani oleh seluruh Pemegang Saham yang mewakili 1.690.302.571 saham atau 100% dari seluruh saham yang ditempatkan dan disetor penuh sehingga ketentuan kuorum RUPS pada Pasal 10 Anggaran Dasar telah terpenuhi. Pelaksanaan RUPS Luar Biasa ini telah dicatatkan dalam Akta Notaris No. 30 tanggal 24 Juni 2024. Adapun keputusan dan realisasi RUPS Luar Biasa 26 Maret 2024 adalah sebagai berikut:

Extraordinary GMS March 26, 2024

Bank Sahabat Sampoerna held the Extraordinary GMS in circulation and was last signed on March 26, 2024 by all Shareholders representing 1,690,302,571 shares or 100% of all issued and fully paid shares. Therefore, the quorum requirements for the GMS in Article 10 of the Articles of Association were fulfilled. The implementation of this Extraordinary GMS has been recorded in Notarial Deed No. 30 dated June 24, 2023. The resolutions and realization of the Extraordinary GMS on March 26, 2024 are disclosed as follows.

Agenda <i>Agenda</i>	Keputusan RUPS <i>GMS Resolutions</i>	Realisasi <i>Realization</i>
Agenda I <i>Agenda-item I</i>	Menyetujui perubahan Pasal 3 Anggaran Dasar Perseroan guna memenuhi tindak lanjut ketentuan Peraturan Pemerintah nomor 5 Tahun 2021 (dua ribu dua puluh satu) tentang Penyelenggaraan Perizinan Berusaha Berbasis Risiko dan Peraturan Badan Pusat Statistik nomor 2 tahun 2020 (dua ribu dua puluh) tentang Klasifikasi Baku Lapangan Usaha Indonesia. <i>Ratify the amendment to Article 3 of the Company's Articles of Association in order to meet the follow-up actions on the provisions of Government Regulation Number 5 of 2021 concerning the Implementation of Risk-Based Business Licensing and Regulation of the Central Statistics Agency Number 2 of 2020 concerning the Indonesian Standard Classification of Business Fields.</i>	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions.</i>

Pelaksanaan RUPS Tahun 2023

Bank Sahabat Sampoerna telah menyelenggarakan RUPS Tahunan pada tanggal 10 Juli 2023 secara sirkulasi dan ditandatangani oleh seluruh Pemegang Saham. Sementara, RUPS Luar Biasa diselenggarakan sebanyak 1 kali secara sirkulasi dan telah ditandatangani oleh seluruh Pemegang Saham terakhir pada tanggal 17 Mei 2023.

2023 GMS Implementation

Bank Sahabat Sampoerna has held an Annual GMS on July 10, 2023 in circulation and signed by all Shareholders. Meanwhile, the Extraordinary GMS was held 1 time in circulation and has been signed by all Shareholders last on May 17, 2023.

RUPS Tahunan 2023

Bank Sahabat Sampoerna menyelenggarakan RUPS Tahunan secara sirkulasi dan ditandatangani oleh seluruh Pemegang Saham yang mewakili 1.690.302.571 saham atau 100% dari seluruh saham yang ditempatkan dan disetor penuh. Maka dari itu, ketentuan kuorum RUPS pada Pasal 10 Anggaran Dasar telah terpenuhi. Pelaksanaan RUPS Tahunan ini telah dicatatkan dalam Akta Notaris No. 14 tanggal 10 Juli 2023. Keputusan dan realisasi RUPS Tahunan 2023 diungkapkan sebagai berikut:

2023 Annual GMS

Bank Sahabat Sampoerna held the Annual GMS through circulation and signed by all Shareholders representing 1,690,302,571 shares or 100% of all shares issued and fully paid. Therefore, the quorum provisions for the GMS in Article 10 of the Articles of Association have been met. The implementation of this Annual GMS has been recorded in Notarial Deed No. 14 dated July 10, 2023. The decisions and realization of the 2023 Annual GMS are disclosed as follows:

Agenda <i>Agenda</i>	Keputusan RUPS <i>GMS Resolution</i>	Realisasi <i>Realization</i>
Agenda I <i>Agenda – Item I</i>	Menerima dan menyetujui Laporan Direksi Perseroan mengenai hasil kegiatan usaha Bank Sahabat Sampoerna untuk tahun buku yang berakhir pada tanggal 31 Desember 2022. <i>Accepting and approving the Bank's Board of Directors' Report on the Bank's business activity results for the financial year that ends on December 31, 2022.</i>	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions</i>
Agenda II <i>Agenda – Item II</i>	Menerima dan menyetujui Laporan Dewan Komisaris Perseroan mengenai tugas pengawasan terhadap Bank Sahabat Sampoerna untuk tahun buku yang berakhir pada tanggal 31 Desember 2022. <i>Accepting and approving the Bank's Board of Commissioners' Report on the Bank's supervisory duty for the financial year that ends on December 31, 2022.</i>	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions</i>
Agenda III <i>Agenda – Item III</i>	Menyetujui dan mengesahkan Laporan Tahunan Bank Sahabat Sampoerna, termasuk Laporan Keuangan untuk tahun buku yang berakhir pada tanggal 31 Desember 2022 yang telah diaudit oleh Kantor Akuntan Publik Tanubrata Sutanto Fahmi Bambang & Rekan dan menerima seluruh pertanggungjawaban Direksi dan Dewan Komisaris Bank Sahabat Sampoerna, serta membebaskan Direksi dan Dewan Komisaris Bank Sahabat Sampoerna dari segala tanggung jawabnya menurut hukum dalam mengurus dan menjalankan Bank Sahabat Sampoerna (<i>Acquit et de charge</i>) selama tahun buku 2022 sejauh tindakan tersebut tercantum dalam Laporan Tahunan Bank Sahabat Sampoerna serta tidak melanggar ketentuan peraturan dan perundangan yang berlaku. <i>Approving and ratifying the Annual Report of Bank Sahabat Sampoerna, including the Financial Statements for the financial year ending on December 31, 2022, which has been audited by the Public Accounting Firm Tanubrata Sutanto Fahmi Bambang & Rekan, and accepting all accountability of the Board of Directors and the Board of Commissioners of Bank Sahabat Sampoerna, as well as releasing the Board of Directors and the Board of Commissioners of Bank Sahabat Sampoerna from all their legal responsibilities in managing and operating Bank Sahabat Sampoerna (Acquit et de charge) during the 2022 financial year provided these actions are included in the Annual Report of Bank Sahabat Sampoerna and do not violate the provisions of applicable laws and regulations.</i>	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions</i>
Agenda IV <i>Agenda – Item IV</i>	Menyetujui usulan Direksi untuk menetapkan seluruh keuntungan yang diperoleh Bank Sahabat Sampoerna pada tahun buku 2022 sebagai laba ditahan (<i>retained-earning</i>). <i>Approving the proposal of the Board of Directors to designate all profits earned by Bank Sahabat Sampoerna in the 2022 financial year as retained earnings.</i>	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions</i>
Agenda V <i>Agenda – Item V</i>	Menerima usulan Direksi untuk meningkatkan dana cadangan umum dari laba tahun buku 2022 sebagaimana diatur dalam Anggaran Dasar, yaitu sebesar Rp500.000.000,-. <i>Accepting the Board of Directors' proposal to increase the general reserve fund from the 2022 financial year profit as stipulated in the Articles of Association, namely Rp500,000,000.</i>	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions</i>
Agenda VI <i>Agenda – Item VI</i>	Menyetujui untuk memberikan kewenangan kepada Dewan Komisaris untuk menetapkan paket remunerasi anggota Direksi dan Dewan Komisaris. <i>Approving to grant authority to the Board of Commissioners to determine the remuneration package for members of the Board of Directors and the Board of Commissioners.</i>	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions</i>
Agenda VII <i>Agenda – Item VII</i>	Menyetujui untuk memberikan kewenangan kepada Dewan Komisaris untuk menunjuk jasa kantor akuntan publik yang akan digunakan sebagai akuntan publik Bank untuk tahun buku 2023, semata-mata dikarenakan para Pemegang Saham beranggapan bahwa Dewan Komisaris mengetahui dengan baik mengenai Bank, karena melakukan tugas pengawasan terhadap jalannya kegiatan bisnis Bank. <i>Approving the granting of authority to the Board of Commissioners to appoint a public accounting firm as the Bank's public accountant for the 2023 financial year, solely because the Shareholders believe that the Board of Commissioners has a good understanding of the Bank due to their supervisory duties over the Bank's business activities.</i>	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions</i>

RUPS Luar Biasa 17 Mei 2023

Bank Sahabat Sampoerna menyelenggarakan RUPS Luar Biasa secara sirkulasi dan ditandatangani terakhir pada tanggal 17 Mei 2023 oleh seluruh Pemegang Saham yang mewakili 1.690.302.571 saham atau 100% dari seluruh saham yang ditempatkan dan disetor penuh. Maka dari itu, ketentuan kuorum RUPS pada Pasal 10 Anggaran Dasar telah terpenuhi. Pelaksanaan RUPS Luar Biasa ini telah dicatatkan dalam Akta Notaris No. 65 tanggal 26 Mei 2023. Keputusan dan realisasi RUPS Luar Biasa 17 Mei 2023 diungkapkan sebagai berikut:

Extraordinary GMS May 17, 2023

Bank Sahabat Sampoerna held an Extraordinary GMS by circulation and was last signed on May 17, 2023 by all Shareholders representing 1,690,302,571 shares or 100% of all shares issued and fully paid. Therefore, the GMS quorum provisions in Article 10 of the Articles of Association have been met. The implementation of this Extraordinary GMS has been recorded in Notarial Deed No. 65 dated May 26, 2023. The decisions and realization of the Extraordinary GMS on May 17, 2023 are disclosed as follows:

Agenda <i>Agenda</i>	Keputusan RUPS <i>GMS Resolutions</i>	Realisasi <i>Realizations</i>
Agenda I <i>Agenda – Item I</i>	<ol style="list-style-type: none"> Persetujuan perubahan susunan anggota Dewan Komisaris Bank Sahabat Sampoerna. Mengangkat kembali: <ul style="list-style-type: none"> > Budi Setiawan Halim sebagai Komisaris Utama; > Harry Mulyadi Santoso sebagai Komisaris; dan > Khoe Minhari Handikusuma sebagai Komisaris Independen. Selanjutnya, mengangkat Anggar Budhi Nuraini sebagai Komisaris Independen. <ol style="list-style-type: none"> <i>Approval of changes to the composition of the Board of Commissioners of Bank Sahabat Sampoerna.</i> <i>Reappointing:</i> <ul style="list-style-type: none"> > <i>Budi Setiawan Halim as President Commissioner;</i> > <i>Harry Mulyadi Santoso as Commissioner; and</i> > <i>Khoe Minhari Handikusuma as Independent Commissioner.</i> <i>Furthermore, appointing Anggar Budhi Nuraini as Independent Commissioner.</i> 	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions</i>
Agenda II <i>Agenda – Item II</i>	<ol style="list-style-type: none"> Persetujuan perubahan susunan Direksi Perseroan. Mengangkat kembali: <ul style="list-style-type: none"> > Ali Rukmijah sebagai Direktur Utama; > A. Dendi Hardiansyah sebagai Direktur Kepatuhan & Manajemen Risiko; > Henky Suryaputra sebagai Direktur; dan Rudy Mahasin sebagai Direktur. Selanjutnya, mengangkat Hendra Rahardja sebagai Direktur. <ol style="list-style-type: none"> <i>Approval of changes to the composition of the Company's Board of Directors.</i> <i>Reappoint:</i> <ul style="list-style-type: none"> > <i>Ali Rukmijah as President Director;</i> > <i>A. Dendi Hardiansyah as Director of Compliance & Risk Management;</i> > <i>Henky Suryaputra as Director; and Rudy Mahasin as Director.</i> <i>Furthermore, appoint Hendra Rahardja as Director.</i> 	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions</i>
Agenda III <i>Agenda – Item III</i>	<p>Persetujuan hibah seluruh saham milik Yan Peter Wangkar kepada Melvin Wangkar.</p> <p><i>Approval of the grant of all shares owned by Yan Peter Wangkar to Melvin Wangkar.</i></p>	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. <i>Realized and has been implemented according to the GMS Resolutions</i>

Dewan Komisaris

Board of Commissioners

Dewan Komisaris merupakan organ utama yang bertugas untuk melakukan pengawasan secara umum dan/atau khusus terhadap kebijakan dan pengelolaan Bank yang dilakukan oleh Direksi sesuai dengan Anggaran Dasar. Dewan Komisaris juga bertugas untuk memberikan nasihat, saran, dan rekomendasi kepada Direksi agar memastikan bahwa Bank telah melaksanakan prinsip-prinsip GCG secara komprehensif dan aktivitas Bank juga telah berjalan secara berkesinambungan.

The Board of Commissioners is the main organ tasked with carrying out general and/or specific supervision of the Bank's policies and management carried out by the Board of Directors in accordance with the Articles of Association. The Board of Commissioners is also tasked with providing advice, suggestions, and recommendations to the Board of Directors to ensure that the Bank has implemented GCG principles comprehensively and that the Bank's activities have also been running sustainably.

Komposisi Dewan Komisaris Tahun 2024

Sampai dengan 31 Desember 2024, komposisi Dewan Komisaris Bank Sahabat Sampoerna tidak mengalami perubahan, yakni berjumlah 4 (empat) orang yang terdiri dari 1 (satu) orang Komisaris Utama, 1 (satu) orang Komisaris, dan 2 (dua) orang Komisaris Independen. Seluruh anggota Dewan Komisaris tersebut diangkat dan diberhentikan berdasarkan keputusan RUPS, serta mempertimbangkan usulan dari PT Sampoerna Investama. Bank juga memastikan seluruh anggota Dewan Komisaris telah memenuhi kriteria sesuai dengan ketentuan Anggaran Dasar dan Kebijakan Umum Tata Kelola Perusahaan (GCG), serta telah lulus uji kelayakan dan kepatutan Otoritas Jasa Keuangan.

Composition of the Board of Commissioners in 2024

As of December 31, 2024, the composition of the Board of Commissioners of Bank Sahabat Sampoerna has not changed, namely 4 (four) people consisting of 1 (one) President Commissioner, 1 (one) Commissioner, and 2 (two) Independent Commissioners. All members of the Board of Commissioners are appointed and dismissed based on the decision of the GMS, and considering the proposal from PT Sampoerna Investama. The Bank also ensures that all members of the Board of Commissioners have met the criteria in accordance with the provisions of the Articles of Association and the General Policy on Corporate Governance (GCG), and have passed the fit and proper test of the Financial Services Authority.

Adapun komposisi anggota Dewan Komisaris Bank Sahabat Sampoerna sepanjang tahun 2024 adalah sebagai berikut:

The composition of the members of the Board of Commissioners of Bank Sahabat Sampoerna throughout 2024 is as follows:

Nama Name	Jabatan Position	Masa Jabatan dan Dasar Pengangkatan Term of Office and Basis of Appointment	Persetujuan Bank Indonesia/ Otoritas Jasa Keuangan Approval from Bank Indonesia/ Financial Services Authority	Akhir Periode Jabatan End of Term of Office
Budi Setiawan Halim	Komisaris Utama President Commissioner	<ul style="list-style-type: none"> 2023-2026: Keputusan di Luar RUPS Luar Biasa tanggal 26 Mei 2023; 2020-2023: Keputusan di Luar RUPS Luar Biasa tanggal 28 Mei 2020; 2017-2020: Keputusan di Luar RUPS Luar Biasa tanggal 22 Mei 2017; 2015-2017: Keputusan RUPS Luar Biasa tanggal 28 Januari 2015; dan 2012-2015: Keputusan RUPS Luar Biasa Februari 2012. 2023-2026 : Circular Resolutions of Extraordinary GMS dated May 26, 2023; 2020-2023 : Circular Resolutions of Extraordinary GMS dated May 28, 2020; 2017-2020 : Circular Resolutions of Extraordinary GMS dated May 22, 2017; 2015-2017 : Extraordinary GMS Resolutions dated January 28, 2015; and 2012-2015 : Extraordinary GMS Resolutions February 2012. 	No. 14/8/GBI/DPIP/Rahasia tanggal 18 Januari 2012. No. 14/8/GBI/DPIP/Rahasia dated January 18, 2012.	2023-2026

Nama Name	Jabatan Position	Masa Jabatan dan Dasar Pengangkatan Term of Office and Basis of Appointment	Persetujuan Bank Indonesia/ Otoritas Jasa Keuangan Approval from Bank Indonesia/ Financial Services Authority	Akhir Periode Jabatan End of Term of Office
Harry Mulyadi Santoso	Komisaris Commissioner	<ul style="list-style-type: none"> 2023-2026 : Keputusan di Luar RUPS Luar Biasa tanggal 26 Mei 2023; 2020-2023 : Keputusan di Luar RUPS Luar Biasa tanggal 28 Mei 2020; dan 2019-2020 : Keputusan Sirkuler Pemegang Saham tanggal 8 Februari 2019. 2023-2026 : Circular Resolutions of Extraordinary GMS dated May 26, 2023; 2020-2023 : Circular Resolutions of Extraordinary GMS dated May 28, 2020; and 2019-2020 : Shareholders Circular Resolutions dated February 8, 2019. 	No. KEP-11/PB.1/2019 tanggal 29 Januari 2019. No. KEP-11/PB.1/2019 dated January 29, 2019.	2023-2026
Khoe Minhari Handikusuma	Komisaris Independen Independent Commissioner	<ul style="list-style-type: none"> 2023-2026 : Keputusan di Luar RUPS Luar Biasa tanggal 26 Mei 2023; 2020-2023 : Keputusan di Luar RUPS Luar Biasa tanggal 28 Mei 2020; 2017-2020 : Keputusan di Luar RUPS Luar Biasa tanggal 22 Mei 2017; dan 2015-2017 : Keputusan RUPS Luar Biasa tanggal 28 Januari 2015. 2023-2026 : Circular Resolutions of Extraordinary GMS dated May 26, 2023; 2020-2023 : Circular Resolutions of Extraordinary GMS dated May 28, 2020; 2017-2020 : Circular Resolutions of Extraordinary GMS dated May 22, 2017; and 2015-2017 : Extraordinary GMS Resolutions dated January 28, 2015. 	No. SR-86/D.03/2015 tanggal 21 Mei 2017. No. SR-86/D.03/2015 dated May 21, 2017.	2023-2026
Anggar Budhi Nuraini	Komisaris Independen Independent Commissioner	2023-2026 : Keputusan di Luar RUPS Luar Biasa tanggal 26 Mei 2023. 2023-2026 : Circular Resolutions of Extraordinary GMS dated May 26, 2023	No. KEPR-104/D.03/2023 tanggal 25 Agustus 2023. No. KEPR-104/D.03/2023 dated August 25, 2023.	2023-2026

Kriteria Anggota Dewan Komisaris

Dewan Komisaris Bank wajib memenuhi ketentuan persyaratan dan pengangkatan sesuai dengan kriteria berikut:

- Yang dapat diangkat menjadi anggota Dewan Komisaris adalah orang perseorangan yang memenuhi persyaratan pada saat diangkat dan selama menjabat, yaitu:
 - Mempunyai akhlak, moral, dan integritas yang baik;
 - Cakap melakukan perbuatan hukum;
 - Dalam waktu 5 tahun sebelum pengangkatannya dan selama menjabat:
 - Tidak pernah dinyatakan pailit;
 - Tidak pernah menjadi anggota Dewan Komisaris yang dinyatakan bersalah menyebabkan suatu perusahaan dinyatakan pailit;
 - Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan Negara dan/atau yang berkaitan dengan sektor keuangan;
 - Memiliki komitmen terhadap pengembangan Lembaga Jasa Keuangan (LJK) yang sehat;
 - Tidak termasuk sebagai pihak yang dilarang untuk menjadi Pihak Utama;
 - Tidak memiliki kredit dan/atau pembiayaan macet;
 - Persyaratan kompetensi meliputi pengetahuan dan/atau pengalaman yang mendukung pengelolaan LJK;

Criteria for Members of the Board of Commissioners

The Bank's Board of Commissioners is required to fulfill the requirements and appointment provisions in accordance with the following criteria:

- The individual who may be appointed as a member of the Board of Commissioners meets the following requirements at the time of appointment and during the term of office:
 - Have good character, morals, and integrity;
 - Capable of performing legal actions;
 - Within 5 years before the appointment and during the term of office:
 - Never been declared bankrupt;
 - Never become a member of a Board of Commissioners found guilty of causing a company to be declared bankrupt;
 - Never been punished for committing a criminal act that is detrimental to state finances and/or related to the financial sector;
 - Has a commitment to the development of a sound Financial Services Institutions (LJK);
 - Not included as a party who is prohibited from becoming Main Party;
 - Not having loss loans and/or financing;
 - Competency requirements include knowledge and/or experience that supports LJK management;

- h. Tidak pernah menjadi Dewan Komisaris yang selama menjabat:
- Pernah tidak menyelenggarakan RUPS Tahunan;
 - Pertanggungjawabannya pernah tidak diterima oleh RUPS atau pernah tidak memberikan pertanggungjawaban sebagai anggota Direksi dan/atau Dewan Komisaris kepada RUPS;
 - Pernah menyebabkan perusahaan yang memperoleh izin, persetujuan, atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan Laporan Tahunan dan/atau Laporan Keuangan kepada Otoritas Jasa Keuangan;
- i. Memiliki komitmen untuk mematuhi peraturan perundang-undangan dan mendukung kebijakan Otoritas Jasa Keuangan;
- j. Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan oleh Bank; dan
- k. Memenuhi persyaratan integritas, kompetensi dan reputasi keuangan sebagaimana disyaratkan oleh regulator.
2. Ketentuan persyaratan sebagaimana dimaksud pada angka (1) di atas tidak mengurangi kemungkinan instansi lain yang berwenang menetapkan persyaratan tambahan berdasarkan peraturan perundang-undangan.
3. Selain persyaratan tersebut di atas, khusus untuk Komisaris Independen juga wajib memenuhi persyaratan sebagai berikut:
- a. Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan Bank termasuk mantan anggota Direksi atau Pejabat Eksekutif Bank atau pihak-pihak yang mempunyai hubungan dengan Bank, yang dapat memengaruhi kemampuannya untuk bertindak independen dalam waktu 1 (satu) tahun terakhir, kecuali untuk pengangkatan kembali sebagai Komisaris Independen Bank pada periode berikutnya;
- b. Ketentuan sebagaimana dimaksud pada angka (3.a) di atas tidak berlaku bagi mantan Direksi atau Pejabat Eksekutif yang melakukan fungsi pengawasan;
- c. Tidak mempunyai saham baik langsung maupun tidak langsung pada bank;
- d. Tidak mempunyai hubungan afiliasi dengan Bank, anggota Dewan Komisaris, anggota Direksi, atau Pemegang Saham Utama Bank;
- e. Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank;
- f. Komisaris Independen yang menjabat sebagai Ketua Komite, hanya dapat merangkap jabatan sebagai Ketua Komite maksimum pada 1 (satu) Komite lain.
- g. Untuk Calon Komisaris Independen harus memiliki Pengetahuan di bidang perbankan yang memadai dan relevan dengan jabatan sebagai Komisaris Independen serta memiliki pengalaman di bidang perbankan dan/atau bidang keuangan.
- h. *Never been a member of a Board of Commissioners, who, during the term of office:*
- *Has failed to convene an annual GMS;*
 - *Has ever had its accountability rejected by the GMS or has ever failed to give its accountability as Board of Directors and/or Board of Commissioners to the GMS;*
 - *Has ever caused a company that obtains permit, approval, or registration from the Financial Services Authority to fail to fulfill its obligation to submit its Annual Report and/or Financial Statements to the Financial Services Authority;*
- i. *Has a commitment to comply with the laws and regulations and support the Financial Services Authority policies;*
- j. *Has knowledge and/or expertise in the field required by the Bank; and*
- k. *Has integrity, competence, and financial reputation as required by the regulator.*
2. *The provisions of requirements mentioned in point (1) above do not eliminate other authorized institutions' ability to impose additional requirements based on laws and regulations.*
3. *In addition to the above requirements, specifically for Independent Commissioners, they must also meet the following requirements:*
- a. *Not a person who works or has the authority and responsibility to plan, lead, control, or supervise the Bank's activities, including former members of the Board of Directors or Executive Officers of the Bank or parties who have a relationship with the Bank, which may affect their ability to act independently within the last 1 (one) year, except for reappointment as Independent Commissioner of the Bank in the following period;*
- b. *The provisions as referred to in number (3.a) above do not apply to former Directors or Executive Officers who perform supervisory functions;*
- c. *Does not have shares either directly or indirectly in the bank;*
- d. *Does not have an affiliated relationship with the Bank, members of the Board of Commissioners, members of the Board of Directors, or Major Shareholders of the Bank;*
- e. *Does not have a business relationship either directly or indirectly related to the Bank's business activities;*
- f. *Independent Commissioners who serve as Committee Chairpersons may only hold concurrent positions as Committee Chairpersons on a maximum of 1 (one) other Committee.*
- g. *Candidates for Independent Commissioners must have adequate knowledge in the banking sector that is relevant to the position of Independent Commissioner and have experience in the banking and/or financial sectors.*

4. Seseorang yang telah memenuhi persyaratan, diajukan kepada Bank untuk dilakukan proses seleksi (*assessment*) kemampuan, latar belakang, kelayakan, pendidikan, akhlak, moral dan integritas calon oleh Komite Remunerasi dan Nominasi (KRN).
 5. Untuk calon yang memenuhi kualifikasi yang akan diajukan kepada Dewan Komisaris untuk diajukan kepada RUPS dan Otoritas Jasa Keuangan (OJK), wajib telah mendapatkan rekomendasi KRN.
 6. Dalam hal anggota KRN memiliki benturan kepentingan (*conflict of interest*) dengan calon anggota Dewan Komisaris, maka hal tersebut wajib diungkapkan.
 7. Anggota Dewan Komisaris diangkat oleh RUPS untuk jangka waktu 3 (tiga) tahun dengan tidak mengurangi hak RUPS untuk memberhentikannya sewaktu-waktu.
 8. Pengangkatan anggota Dewan Komisaris harus mendapat persetujuan RUPS dan telah lulus Penilaian Kemampuan dan Kepatutan (*Fit and Proper Test*) dari OJK, dan/atau memenuhi persyaratan lain yang ditetapkan oleh instansi lain yang terkait sebelum dinyatakan efektif menjabat sebagai Komisaris.
 9. Calon Komisaris yang belum dinyatakan efektif, tidak dapat melakukan tugas dan tanggung jawabnya sebagai Komisaris dan tidak dapat membuat keputusan yang mengikat secara hukum, dan oleh karenanya belum melekat hak dan kewajibannya sebagai Komisaris.
 10. Calon Komisaris yang telah dinyatakan efektif wajib membuat dan menyampaikan Surat Pernyataan Pribadi Komisaris mengenai penjaminan simpanan kepada Lembaga Penjamin Simpanan (LPS) sesuai ketentuan yang berlaku.
 11. Dalam hal jabatan anggota Dewan Komisaris lowong maka sampai diangkatnya seorang anggota Dewan Komisaris baru untuk mengisi lowongan tersebut, Dewan Komisaris akan terdiri dari anggota Dewan Komisaris yang masih tersisa, sampai diangkatnya seorang pengganti. Selambatnya dalam jangka waktu 30 (tiga puluh) hari kalender setelah terjadinya lowongan, Bank harus mengadakan RUPS untuk mengisi lowongan tersebut.
 12. Anggota Dewan Komisaris berhak mengundurkan diri dari jabatannya dengan memberitahukan secara tertulis kepada Bank sekurang-kurangnya 30 (tiga puluh) hari sebelum tanggal pengunduran dirinya.
 13. Jabatan anggota Dewan Komisaris berakhir apabila: i) mengundurkan diri sesuai dengan angka 12 di atas; ii) tidak lagi memenuhi persyaratan yang berlaku; iii) meninggal dunia; iv) diberhentikan oleh RUPS.
 14. Anggota Dewan Komisaris wajib bersedia meningkatkan kompetensi secara terus menerus melalui pendidikan dan pelatihan.
 15. Tidak sedang menjalani konsekuensi hasil akhir dari penilaian kembali pihak utama dengan predikat tidak lulus dan/atau tidak termasuk dalam daftar tidak lulus
 16. Penggantian dan/atau pengangkatan anggota Dewan Komisaris mengedepankan komposisi secara profesional, independensi, kesesuaian kompetensi, dan memperhatikan keberagaman, yang dibutuhkan secara
4. A person who has met the requirements is submitted to the Bank for a selection process (*assessment*) of the candidate's ability, background, eligibility, education, morals, and integrity by the Remuneration and Nomination Committee (KRN).
 5. For candidates who meet the qualifications to be submitted to the Board of Commissioners to be submitted to the GMS and the Financial Services Authority (OJK), they must have received a recommendation from the KRN.
 6. In the event that a KRN member has a conflict of interest with a candidate for member of the Board of Commissioners, this must be disclosed.
 7. Members of the Board of Commissioners are appointed by the GMS for a period of 3 (three) years without reducing the right of the GMS to dismiss them at any time.
 8. The appointment of members of the Board of Commissioners must be approved by the GMS and have passed the Fit and Proper Test from the OJK, and/or meet other requirements set by other related agencies before being declared effective as Commissioners.
 9. Prospective Commissioners who have not been declared effective cannot perform their duties and responsibilities as Commissioners and cannot make legally binding decisions, and therefore their rights and obligations as Commissioners are not yet attached.
 10. Prospective Commissioners who have been declared effective are required to make and submit a Personal Statement of Commissioners regarding deposit insurance to the Deposit Insurance Corporation (LPS) in accordance with applicable provisions.
 11. In the event that the position of a member of the Board of Commissioners is vacant, then until a new member of the Board of Commissioners is appointed to fill the vacancy, the Board of Commissioners will consist of the remaining members of the Board of Commissioners, until a replacement is appointed. No later than 30 (thirty) calendar days after the vacancy occurs, the Bank must hold a GMS to fill the vacancy.
 12. Members of the Board of Commissioners have the right to resign from their positions by notifying the Bank in writing at least 30 (thirty) days before the date of their resignation.
 13. The position of a member of the Board of Commissioners ends if: i) they resign in accordance with point 12 above; ii) they no longer meet the applicable requirements; iii) they die; iv) dismissed by the GMS.
 14. Members of the Board of Commissioners must be willing to continuously improve their competence through education and training.
 15. Not currently undergoing the consequences of the final results of the re-assessment of the main party with a predicate of failing and/or not included in the list of failing
 16. Replacement and/or appointment of members of the Board of Commissioners prioritizes professional composition, independence, suitability of competence, and attention to diversity, which are

- tepat dalam pelaksanaan tugas dan tanggung jawab Dewan Komisaris
17. Bank menetapkan dalam anggaran dasar mengenai kriteria, mekanisme, dan tata cara pengangkatan, penggantian, pemberhentian, dan/atau pengunduran diri anggota Dewan Komisaris, termasuk kewenangan yang melekat kepada Dewan Komisaris, sesuai dengan ketentuan peraturan perundang-undangan
18. Anggota komite yang menjalankan fungsi nominasi yang memiliki benturan kepentingan dengan usulan yang direkomendasikan wajib mengungkapkan dalam usulan yang direkomendasikan.
19. Bank menetapkan dalam anggaran dasar mengenai periode masa jabatan anggota Dewan Komisaris paling lama 5 (lima) tahun untuk 1 (satu) periode masa jabatan yang dimulai sejak tanggal efektif pengangkatan anggota Dewan Komisaris oleh RUPS, serta menetapkan kondisi lain dalam pemenuhan jabatan anggota Dewan Komisaris.
20. Terkait dengan Penerapan Tata Kelola bagi Bank Umum
- Anggota Dewan Komisaris merupakan orang perseorangan yang memenuhi persyaratan persetujuan Otoritas Jasa Keuangan
 - Komisaris Independen dapat merangkap jabatan sebagai Ketua Komite paling banyak pada 2 (dua) Komite pada Bank yang sama.
 - Seluruh anggota Dewan Komisaris selama menjabat wajib memiliki integritas, kompetensi dan reputasi yang baik.
 - Memiliki kompetensi, antara lain;
 - memiliki pengetahuan dan/atau kompetensi (keahlian) yang dapat digunakan dalam pengawasan Bank, termasuk terkait kebijakan pengurusan dan jalannya pengurusan serta memberi nasihat kepada Direksi
 - melakukan pengawasan Bank serta mengarahkan, memantau, dan mengevaluasi pelaksanaan kebijakan strategis Bank sesuai regulasi, dalam rangka pengembangan Bank yang sehat, penerapan manajemen risiko dan sistem pengendalian internal yang efektif dan efisien serta mematuhi peraturan perundang-undangan dan standar yang berlaku;
 - melakukan pengawasan terhadap penyusunan strategi bisnis dan pelaksanaan kegiatan usaha oleh Direksi agar adanya keselarasan aspek lingkungan, sosial, dan tata kelola; dan
 - memiliki pengetahuan tentang Indonesia, terutama mengenai ekonomi, budaya, dan bahasa Indonesia, bagi anggota Dewan Komisaris yang merupakan tenaga kerja asing sesuai dengan Peraturan Otoritas Jasa Keuangan mengenai pemanfaatan tenaga kerja asing dan program alih pengetahuan di sektor perbankan
- needed appropriately in carrying out the duties and responsibilities of the Board of Commissioners*
17. *The Bank stipulates in the articles of association regarding the criteria, mechanisms, and procedures for the appointment, replacement, dismissal, and/or resignation of members of the Board of Commissioners, including the authority inherent in the Board of Commissioners, in accordance with the provisions of laws and regulations*
18. *Members of the committee who carry out the nomination function who have a conflict of interest with the recommended proposal must disclose it in the recommended proposal.*
19. *The Bank stipulates in the articles of association regarding the term of office of members of the Board of Commissioners for a maximum of 5 (five) years for 1 (one) term of office starting from the effective date of the appointment of members of the Board of Commissioners by the GMS, and stipulates other conditions in fulfilling the position of members of the Board of Commissioners.*
20. *Related to the Implementation of Governance for Commercial Banks*
- Members of the Board of Commissioners are individuals who meet the requirements for approval from the Financial Services Authority*
 - Independent Commissioners may hold concurrent positions as Chair of a Committee in a maximum of 2 (two) Committees at the same Bank.*
 - All members of the Board of Commissioners during their term of office must have integrity, competence and a good reputation.*
 - Has the competencies, including;*
 - has the knowledge and/or competence (expertise) that can be used in supervising the Bank, including related to management policies and the course of management and providing advice to the Board of Directors*
 - supervise the Bank and direct, monitor, and evaluate the implementation of the Bank's strategic policies in accordance with regulations, in order to develop a healthy Bank, implement effective and efficient risk management and internal control systems and comply with applicable laws and standards;*
 - supervise the preparation of business strategies and the implementation of business activities by the Board of Directors so that there is harmony between environmental, social, and governance aspects; and*
 - has the knowledge regarding Indonesia, especially regarding the economy, culture, and Indonesian language, for members of the Board of Commissioners who are foreign workers in accordance with the Financial Services Authority Regulation regarding the utilization of foreign workers and knowledge transfer programs in the banking sector*

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| <p>e. Dewan Komisaris telah melaksanakan tugas untuk memastikan terselenggaranya penerapan prinsip Tata Kelola yang baik dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi</p> <p>f. Dewan Komisaris telah melaksanakan tugas dan tanggung jawab secara independen</p> <p>g. Pemilik melakukan intervensi terhadap pelaksanaan tugas Dewan Komisaris yang menyebabkan kegiatan operasional Bank terganggu sehingga berdampak pada berkurangnya keuntungan Bank dan/atau menyebabkan kerugian Bank.</p> <p>h. Hasil rapat Dewan Komisaris merupakan rekomendasi dan/atau arahan yang dapat diimplementasikan oleh RUPS dan/atau Direksi.</p> <p>i. Peningkatan pengetahuan, keahlian, dan kemampuan anggota Dewan Komisaris dalam pengawasan Bank yang ditunjukkan antara lain dengan peningkatan kinerja Bank, penyelesaian permasalahan yang dihadapi Bank, dan pencapaian hasil sesuai ekspektasi Pemangku Kepentingan. Peningkatan budaya pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang perbankan dan perkembangan terkini terkait bidang keuangan atau bidang lain yang mendukung pelaksanaan tugas dan tanggung jawab anggota Dewan Komisaris</p> <p>j. Kegiatan operasional Bank terganggu dan/atau memberikan keuntungan yang tidak wajar kepada pemilik yang berdampak pada berkurangnya keuntungan Bank dan/atau menyebabkan kerugian Bank, akibat intervensi pemilik terhadap komposisi dan/atau pelaksanaan tugas Dewan Komisaris.</p> | <p>e. <i>The Board of Commissioners has carried out its duties to ensure the implementation of Good Governance principles in every business activity of the Bank at all levels or levels of the organization</i></p> <p>f. <i>The Board of Commissioners has carried out its duties and responsibilities independently</i></p> <p>g. <i>The owner intervenes in the implementation of the duties of the Board of Commissioners which causes the Bank's operational activities to be disrupted, resulting in reduced Bank profits and/or causing Bank losses.</i></p> <p>h. <i>The results of the Board of Commissioners meeting are recommendations and/or directives that can be implemented by the GMS and/or the Board of Directors.</i></p> <p>i. <i>Increasing the knowledge, expertise, and abilities of members of the Board of Commissioners in supervising the Bank, demonstrated by, among others, increasing the Bank's performance, resolving problems faced by the Bank, and achieving results according to Stakeholders' expectations. Increasing the culture of continuous learning in order to increase knowledge about banking and the latest developments related to the financial sector or other fields that support the implementation of the duties and responsibilities of members of the Board of Commissioners</i></p> <p>j. <i>The Bank's operational activities are disrupted and/or provide unfair benefits to the owner which results in reduced Bank profits and/or causes Bank losses, due to the owner's intervention in the composition and/or implementation of the duties of the Board of Commissioners.</i></p> |
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Pedoman dan Tata Tertib Kerja Dewan Komisaris

Dewan Komisaris menjalankan tugas dan tanggung jawabnya berdasarkan Pedoman dan Tata Tertib Kerja Dewan Komisaris No. BSS/KK-DEKOM/CSC/01/2024. Pedoman dan Tata Tertib Kerja tersebut membahas mengenai pokok-pokok fungsi Dewan Komisaris, yaitu:

1. Struktur dan Keanggotaan;
2. Persyaratan dan Pengangkatan;
3. Tugas dan Tanggung Jawab;
4. Benturan Kepentingan;
5. Transparansi;
6. Etika dan Waktu Kerja;
7. Rapat;
8. Masa Jabatan;
9. Pengunduran Diri; dan
10. Penilaian dan Pertanggungjawaban Kinerja.

The Board Manual of the Board of Directors

The Board of Directors carries out its duties and responsibilities based on the Board Manual of the Board of Directors No. BSS/KK-DIR/CSC/01/2023. The Board Manual discusses the main functions of the Board of Directors, including:

- 1. Structure and Composition;*
- 2. Requirements and Appointments;*
- 3. Duties and Responsibilities;*
- 4. Conflict of Interest;*
- 5. Transparency;*
- 6. Work Ethics and Working Hours;*
- 7. Meetings;*
- 8. Term of Office;*
- 9. Resignation; and*
- 10. Performance Assessment and Accountability.*

Independensi Dewan Komisaris

Seluruh anggota Dewan Komisaris Bank Sahabat Sampoerna berkomitmen untuk menjalankan tugas dan tanggung jawabnya dengan secara independen. Komitmen tersebut dibuktikan dengan menjalankan tugas dan tanggung jawab secara profesional, objektif, serta penuh kehati-hatian. Bank juga memastikan bahwa anggota Dewan Komisaris tidak memiliki benturan kepentingan dan intervensi dari para Pemegang Saham, sehingga pelaksanaan tugas Dewan Komisaris dapat dijalankan dengan maksimal dan efektif.

Tugas, Tanggung Jawab, dan Wewenang Dewan Komisaris

Dalam melaksanakan fungsi pengawasan terhadap pengelolaan Bank, Dewan Komisaris memiliki tugas dan tanggung jawab sebagai berikut:

1. Setiap anggota Dewan Komisaris tidak dapat bertindak sendiri-sendiri, melainkan berdasarkan keputusan Dewan Komisaris.
2. Dewan Komisaris bertugas melakukan pengawasan untuk kepentingan Bank atas kebijakan dan jalannya pengurusan oleh Direksi, memberikan nasihat kepada Direksi, dan bertanggung jawab atas pengawasan tersebut, sesuai dengan maksud dan tujuan Bank yang ditetapkan dalam ketentuan peraturan perundang-undangan, Anggaran Dasar, dan keputusan RUPS.
3. Dewan Komisaris wajib melaksanakan tugas dan tanggung jawab dengan itikad baik, penuh tanggung jawab, kehati-hatian, dan independen.
4. Dewan Komisaris menerima dan melaksanakan kewenangan sesuai ketentuan perundang-undangan, Anggaran Dasar, dan RUPS.
5. Dewan Komisaris wajib memastikan terselenggaranya pelaksanaan *good corporate governance* dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi paling kurang melalui:
 - a. Pelaksanaan tugas dan tanggung jawab Dewan Komisaris dan Direksi;
 - b. Kelengkapan dan pelaksanaan tugas komite-komite dan satuan kerja yang menjalankan fungsi pengendalian internal Bank;
 - c. Penerapan fungsi kepatuhan, auditor internal, dan auditor eksternal;
 - d. Penerapan manajemen risiko, termasuk sistem pengendalian internal;
 - e. Penyediaan dana kepada pihak terkait dan penyediaan dana besar;
 - f. Rencana strategis Bank;
 - g. Transparansi kondisi keuangan dan non-keuangan Bank; serta
 - h. Menyetujui dan me-review secara berkala visi, misi, dan nilai-nilai utama Bank.

Independence of the Board of Commissioners

All members of the Board of Commissioners of Bank Sahabat Sampoerna are committed to carrying out their duties and responsibilities independently. This commitment is proven by carrying out duties and responsibilities professionally, objectively, and with great care. The Bank also ensures that members of the Board of Commissioners do not have any conflict of interest and intervention from Shareholders, so that the implementation of the Board of Commissioners' duties can be carried out optimally and effectively.

Duties, Responsibilities, and Authorities of the Board of Commissioners

In carrying out its supervisory function over the management of the Bank, the Board of Commissioners has the following duties and responsibilities:

1. *Each member of the Board of Commissioners cannot act alone, but rather based on the decision of the Board of Commissioners.*
2. *The Board of Commissioners is tasked with supervising the interests of the Bank over the policies and management of the Board of Directors, providing advice to the Board of Directors, and is responsible for such supervision, in accordance with the intent and purpose of the Bank as stipulated in the provisions of laws and regulations, the Articles of Association, and decisions of the GMS.*
3. *The Board of Commissioners is required to carry out its duties and responsibilities in good faith, with full responsibility, prudence, and independence.*
4. *The Board of Commissioners receives and exercises authority in accordance with the provisions of laws and regulations, the Articles of Association, and the GMS.*
5. *The Board of Commissioners is required to ensure the implementation of good corporate governance in every business activity of the Bank at all levels or levels of the organization at least through:*
 - a. *Implementation of the duties and responsibilities of the Board of Commissioners and the Board of Directors;*
 - b. *Completeness and implementation of the duties of the committees and work units that carry out the Bank's internal control functions;*
 - c. *Implementation of compliance functions, internal auditors, and external auditors;*
 - d. *Implementation of risk management, including internal control systems;*
 - e. *Provision of funds to related parties and provision of large funds;*
 - f. *The Bank's strategic plan;*
 - g. *Transparency of the Bank's financial and non-financial conditions; and*
 - h. *Approving and periodically reviewing the Bank's vision, mission, and core values.*

6. Dewan Komisaris bertugas melakukan pengawasan terhadap kebijakan pengurusan, jalannya pengurusan pada umumnya dan bertanggung jawab atas pengawasan tersebut serta memberikan nasihat kepada Direksi.
 7. Dalam melakukan pengawasan, Dewan Komisaris wajib mengarahkan, memantau, dan mengevaluasi pelaksanaan kebijakan strategis Bank sesuai peraturan yang berlaku.
 8. Dalam hal hanya ada seorang anggota Dewan Komisaris karena anggota lainnya berhalangan, segala tugas dan wewenang yang diberikan kepada Komisaris Utama atau anggota Dewan Komisaris lainnya dalam Anggaran Dasar Bank berlaku pula baginya.
 9. Dewan Komisaris dilarang terlibat dalam pengambilan keputusan kegiatan operasional Bank, kecuali:
 - a. Penyediaan dana kepada pihak terkait sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan tentang Batas Maksimum Pemberian Kredit Bank Umum; dan
 - b. Hal-hal lain yang ditetapkan dalam Anggaran Dasar Bank atau peraturan perundangan yang berlaku.
 10. Pengambilan keputusan oleh Dewan Komisaris merupakan bagian dari tugas pengawasan Dewan Komisaris sehingga tidak meniadakan tanggung jawab Direksi atas pelaksanaan kepengurusan Bank.
 11. Dewan Komisaris menyetujui dan melakukan pengawasan atas penerapan Strategi Rencana Bisnis Bank dan beberapa kebijakan Bank sesuai ketentuan yang berlaku, antara lain penetapan serta penerapan strategi Anti-Fraud, prosedur Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme (APU-PPT), Batas Minimum Pemberian Kredit (BMPK), dan strategi Bank lainnya sesuai ketentuan yang berlaku.
 12. Pengawasan aktif Dewan Komisaris terhadap penerapan APU-PPT dan PPPSPM paling kurang meliputi:
 - 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; serta
 - e. Memastikan adanya pembahasan terkait penerapan program APU-PPT dan PPPSPM dalam rapat Direksi dan Dewan Komisaris.
6. *The Board of Commissioners is tasked with supervising management policies, the course of management in general and is responsible for such supervision and providing advice to the Board of Directors.*
 7. *In carrying out supervision, the Board of Commissioners is required to direct, monitor, and evaluate the implementation of the Bank's strategic policies in accordance with applicable regulations.*
 8. *In the event that there is only one member of the Board of Commissioners because the other members are absent, all duties and authorities given to the President Commissioner or other members of the Board of Commissioners in the Bank's Articles of Association shall also apply to him/her.*
 9. *The Board of Commissioners is prohibited from being involved in decision-making on the Bank's operational activities, except:*
 - a. *Provision of funds to related parties as stipulated in the Financial Services Authority provisions on the Maximum Credit Limit for Commercial Banks; and*
 - b. *Other matters stipulated in the Bank's Articles of Association or applicable laws and regulations.*
 10. *Decision-making by the Board of Commissioners is part of the Board of Commissioners' supervisory duties so that it does not eliminate the Board of Directors' responsibility for the implementation of the Bank's management.*
 11. *The Board of Commissioners approves and supervises the implementation of the Bank's Business Plan Strategy and several Bank policies in accordance with applicable provisions, including the determination and implementation of the Anti-Fraud strategy, Anti-Money Laundering and Prevention of Terrorism Financing (APU-PPT) procedures, Minimum Credit Limit (BMPK), and other Bank strategies in accordance with applicable provisions.*
 12. *The Board of Commissioners' active supervision of the implementation of AML-CTF and CPF includes at least:*
 - a. *Ensuring that the Bank has policies and procedures for implementing the AML-CTF and CPF programs;*
 - b. *Granting approval for the policies and procedures for the implementation of the AML-CTF and CPF programs proposed by the Board of Directors;*
 - c. *Conducting an evaluation of the policies and procedures for the implementation of the AML-CTF and CPF programs;*
 - d. *Conducting supervision over the implementation of the Board of Directors' responsibilities for the implementation of the AML-CTF and CPF programs; and*
 - e. *Ensuring that there is a discussion regarding the implementation of the AML-CTF and CPF programs in meetings of the Board of Directors and the Board of Commissioners.*

- f. Dewan Komisaris dilarang memberitahukan kepada Pengguna Jasa atau pihak lain, baik secara langsung maupun tidak langsung, dengan cara apa pun mengenai laporan Transaksi Keuangan Mencurigakan yang sedang disusun atau telah disampaikan kepada PPATK, mengenai larangan sebagaimana dimaksud tidak berlaku untuk pemberian informasi kepada Lembaga Pengawas dan Pengatur.
13. Wewenang dan tanggung jawab Dewan Komisaris terhadap penerapan manajemen risiko dalam penggunaan teknologi informasi paling kurang meliputi:
- Mengevaluasi, mengarahkan dan memantau rencana strategis teknologi informasi dan kebijakan Bank terkait penggunaan teknologi informasi; dan
 - Mengevaluasi pertanggungjawaban Direksi atas penerapan manajemen risiko dalam penggunaan teknologi informasi.
 - Bank wajib menerapkan manajemen risiko secara efektif dalam penggunaan Teknologi Informasi, penerapan manajemen risiko sebagaimana dimaksud paling sedikit mencakup pengawasan aktif Dewan Komisaris
 - Bank wajib menetapkan wewenang dan tanggung jawab yang jelas dari Dewan Komisaris, dan pejabat pada setiap jenjang jabatan yang terkait dengan penerapan tata kelola Teknologi Informasi.
 - Wewenang dan tanggung jawab Dewan Komisaris sebagaimana dimaksud paling sedikit mencakup:
 - mengevaluasi, mengarahkan, dan memantau rencana strategis Teknologi Informasi dan
 - mengevaluasi, mengarahkan, dan memantau penerapan tata kelola Teknologi Informasi
14. Dewan Komisaris melalui Komite Remunerasi dan Nominasi melakukan pengawasan terhadap pemilihan dan penilaian calon anggota Direksi maupun Dewan Komisaris tanpa melakukan intervensi.
15. Dewan Komisaris wajib memastikan bahwa Direksi telah menindaklanjuti temuan audit dan rekomendasi dari satuan audit intern Bank, auditor ekstern, hasil pengawasan Otoritas Jasa Keuangan dan/atau hasil pengawasan otoritas lainnya.
16. Dewan Komisaris wajib memberitahukan kepada Otoritas Jasa Keuangan paling lambat 5 hari kerja sejak ditemukannya:
- Pelanggaran peraturan perundang-undangan di bidang keuangan, perbankan, dan yang terkait dalam kegiatan usaha Bank; dan/atau
 - Keadaan atau perkiraan keadaan yang dapat membahayakan kelangsungan usaha Bank; serta
- f. *The Board of Commissioners is prohibited from notifying Service Users or other parties, either directly or indirectly, in any way regarding the Suspicious Financial Transaction report that is being prepared or has been submitted to the PPATK, regarding the prohibition as referred to does not apply to the provision of information to the Supervisory and Regulatory Institution.*
13. *The authority and responsibility of the Board of Commissioners regarding the implementation of risk management in the use of information technology at least include:*
- Evaluating, directing and monitoring the strategic plan of information technology and the Bank's policies related to the use of information technology; and*
 - Evaluating the accountability of the Board of Directors for the implementation of risk management in the use of information technology.*
 - The Bank is required to implement risk management effectively in the use of Information Technology, the implementation of risk management as referred to at least includes active supervision of the Board of Commissioners*
 - The Bank is required to determine the clear authority and responsibility of the Board of Commissioners, and officials at each level of office related to the implementation of Information Technology governance.*
 - The authority and responsibility of the Board of Commissioners as referred to at least include:*
 - evaluating, directing, and monitoring the strategic plan of Information Technology and*
 - evaluating, directing, and monitoring the implementation of Information Technology governance*
14. *The Board of Commissioners through the Remuneration and Nomination Committee supervises the selection and assessment of prospective members of the Board of Directors and the Board of Commissioners without intervening.*
15. *The Board of Commissioners must ensure that the Board of Directors has followed up on audit findings and recommendations from the Bank's internal audit unit, external auditors, the results of supervision by the Financial Services Authority and/or the results of supervision by other authorities.*
16. *The Board of Commissioners must notify the Financial Services Authority no later than 5 working days after the discovery of:*
- Violations of laws and regulations in the fields of finance, banking, and those related to the Bank's business activities; and/or*
 - Circumstances or estimated circumstances that may endanger the continuity of the Bank's business; and*

- c. Berdasarkan rekomendasi dari komite-komite yang membantu efektivitas pelaksanaan tugas Dewan Komisaris. Hal yang dilaporkan adalah temuan yang belum atau tidak dilaporkan oleh Bank dan/atau oleh Direktur yang membawahkan fungsi kepatuhan kepada Otoritas Jasa Keuangan.
17. Dalam rangka mendukung efektivitas pelaksanaan tugas dan tanggung jawabnya, Dewan Komisaris wajib membentuk paling kurang:
- Komite Audit;
 - Komite Pemantau Risiko;
 - Komite Remunerasi dan Nominasi;
 - Dewan Komisaris dapat membentuk komite lain yang disesuaikan dengan kebutuhan dan/atau kompleksitas Bank dan/atau memperluas cakupan pelaksanaan tugas, tanggung jawab, dan wewenang komite dalam mendukung pelaksanaan tugas dan tanggung jawab pengawasan Dewan Komisaris; dan
 - Dalam hal Dewan Komisaris membentuk komite lain, keanggotaan komite lain paling sedikit terdiri atas Komisaris Independen dan/atau Komisaris Non- Independen, serta dapat melibatkan pihak lain sesuai dengan tujuan pembentukan komite.
18. Pengangkatan anggota Komite dilakukan oleh Direksi berdasarkan keputusan Rapat Dewan Komisaris.
19. Tugas dan tanggung jawab masing-masing komite diatur dalam Pedoman dan Tata Tertib Kerja Komite masing-masing.
20. Dewan Komisaris wajib melakukan pengawasan terhadap komite yang telah dibentuk, menjalankan tugasnya secara efektif, dan wajib melakukan evaluasi dan/atau penilaian terhadap kinerja komite dimaksud sekurang-kurangnya pada setiap akhir tahun buku.
21. Dewan Komisaris wajib melakukan pengawasan aktif terhadap fungsi kepatuhan dengan:
- Mengevaluasi pelaksanaan Fungsi Kepatuhan Bank paling kurang 2 kali dalam satu tahun; dan
 - Memberikan saran-saran dalam rangka meningkatkan kualitas pelaksanaan Fungsi Kepatuhan Bank.
22. Dewan Komisaris menyampaikan saran-saran dalam rangka peningkatan kualitas pelaksanaan Fungsi Kepatuhan kepada Direktur Utama dengan tembusan kepada Direktur yang membawahkan Fungsi Kepatuhan.
23. Dewan Komisaris bertanggung jawab untuk memastikan penerapan manajemen risiko sesuai dengan karakteristik, kompleksitas, dan profil risiko Bank dengan:
- Menyetujui kebijakan manajemen risiko termasuk strategi dan kerangka manajemen risiko yang ditetapkan sesuai dengan tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) Bank;
 - Mengevaluasi kebijakan manajemen risiko dan strategi
- c. *Based on recommendations from committees that assist in the effective implementation of the Board of Commissioners' duties. Matters reported are findings that have not been or are not reported by the Bank and/or by the Director in charge of the compliance function to the Financial Services Authority.*
17. *In order to support the effective implementation of its duties and responsibilities, the Board of Commissioners must form at least:*
- Audit Committee;*
 - Risk Monitoring Committee;*
 - Remuneration and Nomination Committee;*
 - The Board of Commissioners may form other committees that are adjusted to the needs and/or complexity of the Bank and/or expand the scope of the implementation of the duties, responsibilities, and authorities of the committee in supporting the implementation of the duties and responsibilities of supervision of the Board of Commissioners; and*
 - In the event that the Board of Commissioners forms another committee, the membership of the other committee shall consist of at least Independent Commissioners and/or Non-Independent Commissioners, and may involve other parties in accordance with the purpose of establishing the committee.*
18. *The appointment of Committee members is made by the Board of Directors based on the decision of the Board of Commissioners Meeting.*
19. *The duties and responsibilities of each committee are regulated in the Guidelines and Work Procedures of each Committee.*
20. *The Board of Commissioners must supervise the committees that have been established, carry out their duties effectively, and must evaluate and/or assess the performance of the committee at least at the end of each financial year.*
21. *The Board of Commissioners is required to actively supervise the compliance function by:*
- Evaluating the implementation of the Bank's Compliance Function at least 2 times a year; and*
 - Providing suggestions in order to improve the quality of the implementation of the Bank's Compliance Function.*
22. *The Board of Commissioners submits suggestions in order to improve the quality of the implementation of the Compliance Function to the President Director with a copy to the Director in charge of the Compliance Function.*
23. *The Board of Commissioners is responsible for ensuring the implementation of risk management in accordance with the characteristics, complexity, and risk profile of the Bank by:*
- Approving risk management policies including risk management strategies and frameworks that are determined in accordance with the level of risk to be taken (risk appetite) and risk tolerance of the Bank;*
 - Evaluate risk management policies and risk*

- manajemen risiko paling kurang satu kali dalam satu tahun atau dalam frekuensi yang lebih sering dalam hal terdapat perubahan faktor-faktor yang mempengaruhi kegiatan usaha Bank secara signifikan;
- c. Menyetujui kebijakan, pengawasan, dan prosedur pengelolaan serta mitigasi TPPU, TPPT, dan/atau PPPSPM dan dokumen penilaian risiko individual (*internal risk assessment*, TPPU, TPPT, dan/atau PPPSPM pada Bank);
 - d. Wewenang dan tanggung jawab Dewan Komisaris paling sedikit:
 - Mengevaluasi pertanggungjawaban Direksi atas pelaksanaan kebijakan manajemen risiko; serta
 - Mengevaluasi dan memutuskan permohonan Direksi yang berkaitan dengan transaksi yang memerlukan persetujuan Dewan Komisaris.
24. Rencana aksi keuangan berkelanjutan yang disusun oleh Direksi wajib disetujui oleh Dewan Komisaris.
25. Setiap anggota Dewan Komisaris bertanggung jawab secara tanggung renteng atas kerugian Bank yang disebabkan oleh kesalahan atau kelalaian anggota Dewan Komisaris dalam menjalankan tugasnya.
26. Anggota Dewan Komisaris tidak dapat dipertanggungjawabkan atas kerugian Bank sebagaimana dimaksud pada angka (25) apabila dapat membuktikan bahwa:
- a. Kerugian tersebut bukan karena kesalahan atau kelalaiannya;
 - b. Telah melakukan pengawasan dengan itikad baik, penuh tanggung jawab, dan kehati-hatian untuk kepentingan dan sesuai dengan maksud dan tujuan Bank;
 - c. Tidak mempunyai benturan kepentingan baik langsung maupun tidak langsung atas tindakan pengurusan yang mengakibatkan kerugian; dan
 - d. Telah mengambil tindakan untuk mencegah timbul atau berlanjutnya kerugian tersebut.
27. Dalam RUPS, apabila semua Direksi tidak hadir atau berhalangan karena sebab apa pun hal mana tidak perlu dibuktikan kepada pihak ketiga, maka RUPS akan dipimpin oleh Komisaris Utama. Apabila Komisaris Utama tidak hadir atau berhalangan karena sebab apa pun yang tidak perlu dibuktikan kepada pihak ketiga, maka RUPS dipimpin oleh seorang anggota Dewan Komisaris.
28. Dewan Komisaris berdasarkan keputusan Rapat Dewan Komisaris berwenang memberhentikan untuk sementara anggota Direksi dengan menyebutkan alasannya. Terkhusus untuk Direktur Utama dan/atau Direktur yang membawahkan fungsi kepatuhan diatur bahwa:
- a. Pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan sebelum periode masa jabatan berakhir wajib mendapatkan persetujuan terlebih dahulu dari Otoritas Jasa Keuangan sebelum diputuskan dalam RUPS.
- management strategies at least once a year or more frequently in the event of changes in factors that significantly affect the Bank's business activities;*
- c. *Approve policies, supervision, and procedures for the management and mitigation of TPPU, TPPT, and/or PPPSPM and individual risk assessment documents (internal risk assessment, TPPU, TPPT, and/or PPPSPM at the Bank);*
 - d. *The authority and responsibility of the Board of Commissioners are at least:*
 - *Evaluate the accountability of the Board of Directors for the implementation of risk management policies; and*
 - *Evaluate and decide on requests from the Board of Directors relating to transactions that require the approval of the Board of Commissioners.*
24. *The sustainable financial action plan prepared by the Board of Directors must be approved by the Board of Commissioners.*
25. *Each member of the Board of Commissioners is jointly and severally liable for the Bank's losses caused by errors or negligence of members of the Board of Commissioners in carrying out their duties.*
26. *Members of the Board of Commissioners cannot be held responsible for the Bank's losses as referred to in number (25) if they can prove that:*
- a. *The loss was not due to their error or negligence;*
 - b. *Has carried out supervision in good faith, with full responsibility, and with caution for the interests and in accordance with the intent and purpose of the Bank;*
 - c. *Has no conflict of interest, either directly or indirectly, regarding management actions that result in losses; and*
 - d. *Has taken action to prevent the occurrence or continuation of such losses.*
27. *In the GMS, if all Directors are absent or are prevented from attending for any reason whatsoever, which does not need to be proven to a third party, then the GMS will be led by the President Commissioner. If the President Commissioner is absent or prevented from attending for any reason whatsoever, which does not need to be proven to a third party, then the GMS will be led by a member of the Board of Commissioners.*
28. *The Board of Commissioners based on the decision of the Board of Commissioners Meeting has the authority to temporarily dismiss members of the Board of Directors by stating the reasons. Specifically for the President Director and/or Director in charge of the compliance function, it is regulated that:*
- a. *Dismissal or replacement of the president director and/or director in charge of the compliance function before the end of the term of office must first obtain approval from the Financial Services Authority before being decided in the GMS.*

- b. Dalam memberikan persetujuan, Otoritas Jasa Keuangan melakukan penilaian terhadap kelayakan rencana pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan.
- c. Sebagai bahan penilaian oleh Otoritas Jasa Keuangan, Bank menyampaikan permohonan kepada Otoritas Jasa Keuangan dengan memuat informasi mengenai:
- Alasan atau pertimbangan dilakukannya pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan; dan
 - Bank dapat menyertakan profil calon pengganti yang dinilai memenuhi persyaratan untuk dilakukan penilaian kemampuan dan kepatutan.
- d. Penyampaian permohonan kepada Otoritas Jasa Keuangan disampaikan Bank paling lama 1 (satu) bulan sebelum rencana pelaksanaan RUPS yang memuat agenda pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan.
- e. Dalam hal Otoritas Jasa Keuangan menilai rencana pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan tidak layak maka:
- rencana pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan dimaksud tidak disetujui Otoritas Jasa Keuangan; dan
 - Bank dilarang memuat agenda pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan dalam RUPS.
29. Dalam hal terdapat anggota Direksi yang diberhentikan untuk sementara, Dewan Komisaris harus menyelenggarakan RUPS dalam jangka waktu paling lambat 30 hari setelah tanggal pemberhentian sementara tersebut, untuk mencabut atau menguatkan keputusan pemberhentian sementara tersebut.
30. Pertanggungjawaban atas pelaksanaan tugas yang dijalankan oleh anggota Direksi yang diberhentikan sementara tersebut sejak pertanggungjawaban yang terakhir sampai dengan pemberhentian sementara efektif tetap harus dimintakan pada RUPS Tahunan yang terdekat.
31. Dewan Komisaris dapat melakukan tindakan pengurusan Bank dalam keadaan tertentu dan untuk jangka waktu tertentu. Dalam hal demikian berlaku semua ketentuan mengenai hak, wewenang, dan kewajiban Direksi terhadap Bank dan pihak ketiga.
32. Dewan Komisaris setiap waktu dalam jam kerja kantor berhak memasuki bangunan dan halaman atau tempat lain yang dipergunakan atau yang dikuasai oleh Bank, dan berhak memeriksa semua pembukuan, surat dan alat bukti lainnya, memeriksa dan mencocokkan keadaan uang kas dan lain-lain serta berhak untuk mengetahui segala tindakan yang telah dijalankan oleh Direksi.
- b. *In providing approval, the Financial Services Authority assesses the feasibility of the plan to dismiss or replace the president director and/or director in charge of the compliance function.*
- c. *As material for assessment by the Financial Services Authority, the Bank submits an application to the Financial Services Authority containing information regarding:*
- *Reasons or considerations for dismissing or replacing the president director and/or director in charge of the compliance function; and*
 - *The Bank may include a profile of a replacement candidate who is considered to meet the requirements for a fit and proper assessment.*
- d. *The Bank submits the application to the Financial Services Authority no later than 1 (one) month before the planned implementation of the GMS containing the agenda for dismissing or replacing the president director and/or director in charge of the compliance function.*
- e. *In the event that the Financial Services Authority deems the plan to dismiss or replace the president director and/or director in charge of the compliance function to be inappropriate, then:*
- *the plan to dismiss or replace the president director and/or director in charge of the compliance function is not approved by the Financial Services Authority; and*
 - *The Bank is prohibited from including the agenda for dismissing or replacing the president director and/or director in charge of the compliance function in the GMS.*
29. *In the event that a member of the Board of Directors is temporarily dismissed, the Board of Commissioners must hold a GMS no later than 30 days after the date of the temporary dismissal, to revoke or strengthen the decision on the temporary dismissal.*
30. *Accountability for the implementation of duties carried out by the member of the Board of Directors who has been temporarily dismissed since the last accountability until the temporary dismissal becomes effective must still be requested at the nearest Annual GMS.*
31. *The Board of Commissioners may take action to manage the Bank under certain circumstances and for a certain period of time. In such a case, all provisions regarding the rights, authorities, and obligations of the Board of Directors towards the Bank and third parties apply.*
32. *The Board of Commissioners at any time during office hours has the right to enter buildings and yards or other places used or controlled by the Bank, and has the right to examine all books, letters and other evidence, examine and match the condition of cash and others and has the right to know all actions that have been carried out by the Board of Directors.*

33. Dewan Komisaris berhak untuk memperoleh penjelasan mengenai segala hal yang berkaitan dengan operasional Bank dan anak perusahaan serta hal-hal yang berkaitan dengan etika Bank.
34. Dewan Komisaris harus memastikan Direksi memiliki dan melaksanakan rencana kegiatan literasi keuangan dan inklusi keuangan.

Tugas Pokok Komisaris Utama

1. Mengkoordinasikan pelaksanaan tugas dan tanggung jawab Dewan Komisaris;
2. Memberikan usulan untuk mengadakan rapat Dewan Komisaris, termasuk agenda rapat;
3. Melakukan pemanggilan dan memimpin rapat Dewan Komisaris;
4. Menyampaikan Laporan Pengawasan untuk mendapatkan persetujuan RUPS Tahunan atas pelaksanaan tugas dan pengawasan Dewan Komisaris, laporan paling sedikit meliputi penilaian Dewan Komisaris, mengenai:
 - a. Pelaksanaan rencana bisnis, baik secara kuantitatif ataupun kualitatif;
 - b. Faktor-faktor yang mempengaruhi kinerja Bank; serta
 - c. Upaya memperbaiki kinerja Bank;
5. Memastikan bahwa pelaksanaan tanggung jawab Dewan Komisaris telah dilaksanakan sesuai prosedur;
6. Memastikan bahwa rapat Dewan Komisaris melakukan pengambilan keputusan secara efektif berdasarkan informasi yang benar dan lengkap, termasuk memastikan bahwa:
 - a. Semua isu-isu strategis dan penting menjadi bahan pertimbangan oleh Dewan Komisaris;
 - b. Permasalahan yang ada dibahas dengan seksama dan teliti;
 - c. Semua anggota Dewan Komisaris diberi kesempatan untuk berkontribusi secara efektif;
 - d. Setiap Komisaris menerima informasi yang relevan secara tepat waktu, termasuk diberi penjelasan singkat mengenai isu-isu yang akan dibahas dalam rapat Dewan Komisaris; serta
 - e. Rapat Dewan Komisaris menghasilkan keputusan-keputusan yang jelas dan dicatat di dalam Risalah Rapat;
7. Memastikan bahwa Dewan Komisaris bersikap sesuai dengan Pedoman dan Tata Tertib Kerja Dewan Komisaris;
8. Memimpin upaya untuk memenuhi kebutuhan pengembangan Dewan Komisaris;
9. Melakukan tanggung jawab lain yang ditugaskan oleh Dewan Komisaris dari waktu ke waktu; dan
10. Melakukan evaluasi akhir dengan mempertimbangkan rekomendasi Komite Remunerasi dan Nominasi atas hasil evaluasi kolektif Dewan Komisaris dan komite-komite, serta evaluasi individu anggota Dewan Komisaris dan anggota Komite.

33. *The Board of Commissioners has the right to obtain an explanation regarding all matters relating to the operations of the Bank and its subsidiaries and matters relating to the Bank's ethics.*
34. *The Board of Commissioners must ensure that the Board of Directors has and implements a financial literacy and financial inclusion activity plan.*

Main Duties of the President Commissioner

1. *Coordinating the implementation of the duties and responsibilities of the Board of Commissioners;*
2. *Providing proposals to hold meetings of the Board of Commissioners, including meeting agendas;*
3. *Summoning and leading meetings of the Board of Commissioners;*
4. *Submitting a Supervisory Report to obtain approval from the Annual GMS on the implementation of the duties and supervision of the Board of Commissioners, the report at least includes the Board of Commissioners' assessment of:*
 - a. *Implementation of the business plan, both quantitatively and qualitatively;*
 - b. *Factors affecting the Bank's performance; and*
 - c. *Efforts to improve the Bank's performance;*
5. *Ensuring that the implementation of the Board of Commissioners' responsibilities has been carried out according to procedure;*
6. *Ensuring that the Board of Commissioners' meetings make decisions effectively based on correct and complete information, including ensuring that:*
 - a. *All strategic and important issues are considered by the Board of Commissioners;*
 - b. *Existing problems are discussed carefully and thoroughly;*
 - c. *All members of the Board of Commissioners are given the opportunity to contribute effectively;*
 - d. *Each Commissioner receives relevant information in a timely manner, including being given a brief explanation of the issues to be discussed in the Board of Commissioners meeting; and*
 - e. *The Board of Commissioners meeting produces clear decisions and is recorded in the Minutes of Meeting;*
7. *Ensures that the Board of Commissioners acts in accordance with the Board of Commissioners Guidelines and Work Procedures;*
8. *Leads efforts to meet the development needs of the Board of Commissioners;*
9. *Performs other responsibilities assigned by the Board of Commissioners from time to time; and*
10. *Conducts a final evaluation by considering the recommendations of the Remuneration and Nomination Committee on the results of the collective evaluation of the Board of Commissioners and committees, as well as individual evaluations of members of the Board of Commissioners and Committee members.*

Benturan Kepentingan

Kebijakan terkait benturan kepentingan Dewan Komisaris telah dijelaskan dalam Pedoman dan Tata Tertib Dewan Komisaris Bank Sahabat Sampoerna, sebagai berikut:

1. Anggota Dewan Komisaris harus menghindari terjadinya potensi benturan kepentingan atau selalu menempatkan diri untuk tidak berada dalam potensi terjadinya benturan kepentingan dalam situasi apa pun. Dalam hal terjadi benturan kepentingan, anggota Dewan Komisaris dilarang mengambil tindakan yang dapat merugikan atau mengurangi keuntungan Bank dan wajib mengungkapkan potensi benturan kepentingan dimaksud dalam setiap keputusan.
2. Prosedur yang harus dilalui oleh anggota Dewan Komisaris apabila terjadi benturan kepentingan adalah sebagai berikut.
 - a. Wajib untuk segera melaporkan secara tertulis kepada Dewan Komisaris mengenai semua hal yang berpotensi menciptakan dan/atau mengandung benturan kepentingan yang berdampak signifikan dalam segi finansial maupun reputasi untuk Bank, Dewan Komisaris, dan Direksi.
 - b. Tidak diperbolehkan untuk turut serta dalam proses penilaian terhadap semua kegiatan yang mengandung benturan kepentingan tersebut.
 - c. Dapat ikut serta dalam rapat, namun tidak diperkenankan untuk ikut serta dalam pengambilan keputusan.
3. Dalam hal anggota Dewan Komisaris yang ditunjuk oleh Dewan Komisaris untuk memimpin RUPS mempunyai benturan kepentingan atas hal yang akan diputuskan dalam RUPS, maka RUPS dipimpin oleh anggota Dewan Komisaris lainnya yang ditunjuk oleh Dewan Komisaris yang tidak mempunyai benturan kepentingan.
4. Apabila semua anggota Dewan Komisaris mempunyai benturan kepentingan atas hal yang akan diputuskan dalam RUPS, maka RUPS dipimpin oleh Direktur Utama.
5. Apabila semua anggota Dewan Komisaris dan Direksi mempunyai benturan kepentingan, maka RUPS akan dipimpin oleh salah seorang Pemegang Saham Independen, yaitu Pemegang Saham yang tidak mempunyai benturan kepentingan, yang dipilih dari dan oleh Pemegang Saham Independen yang hadir dalam RUPS.
6. Anggota Dewan Komisaris, dilarang meminta, menerima, mengizinkan, dan/atau menyetujui untuk menerima imbalan, komisi, uang tambahan, pelayanan, uang, barang berharga, dan/atau segala sesuai yang mempunyai nilai ekonomis atau manfaat lain, untuk keuntungan pribadi, keluarga, dan pihak lain, dalam pelaksanaan kegiatan usaha Bank dan kegiatan lain terkait dengan Bank.
7. Anggota Dewan Komisaris, wajib menolak dan/atau dilarang menerima suatu perintah atau permintaan dari Pemegang Saham Bank, pihak terafiliasi, dan/atau pihak lain untuk:
 - a. Melakukan tindakan yang terkait dengan kegiatan usaha Bank dan/atau kegiatan lain yang tidak sesuai dengan penerapan tata kelola yang baik (GCG) pada Bank;

Conflict of Interest

The policy related to conflicts of interest of the Board of Commissioners has been explained in the Guidelines and Rules of Procedure of the Board of Commissioners of Bank Sahabat Sampoerna, as follows:

1. *Members of the Board of Commissioners must avoid potential conflicts of interest or always position themselves so as not to be in a potential conflict of interest in any situation. In the event of a conflict of interest, members of the Board of Commissioners are prohibited from taking actions that could harm or reduce the Bank's profits and are required to disclose the potential conflict of interest in every decision.*
2. *The procedures that must be followed by members of the Board of Commissioners if a conflict of interest occurs are as follows.*
 - a. *Must immediately report in writing to the Board of Commissioners regarding all matters that have the potential to create and/or contain a conflict of interest that has a significant impact in terms of finance or reputation for the Bank, the Board of Commissioners, and the Board of Directors.*
 - b. *Not allowed to participate in the assessment process for all activities that contain the conflict of interest.*
 - c. *May participate in meetings, but are not allowed to participate in decision making.*
3. *In the event that a member of the Board of Commissioners appointed by the Board of Commissioners to lead the GMS has a conflict of interest on matters to be decided in the GMS, then the GMS will be led by another member of the Board of Commissioners appointed by the Board of Commissioners who does not have a conflict of interest.*
4. *If all members of the Board of Commissioners have a conflict of interest on matters to be decided in the GMS, then the GMS will be led by the President Director.*
5. *If all members of the Board of Commissioners and the Board of Directors have a conflict of interest, then the GMS will be led by one of the Independent Shareholders, namely a Shareholder who does not have a conflict of interest, who is selected from and by the Independent Shareholders present at the GMS.*
6. *Members of the Board of Commissioners are prohibited from requesting, accepting, permitting, and/or agreeing to receive compensation, commission, additional money, services, money, valuables, and/or anything that has economic value or other benefits, for personal gain, family, and other parties, in the implementation of the Bank's business activities and other activities related to the Bank.*
7. *Members of the Board of Commissioners must reject and/or are prohibited from accepting an order or request from the Bank's Shareholders, affiliated parties, and/or other parties to:*
 - a. *Take actions related to the Bank's business activities and/or other activities that are not in accordance with the implementation of good governance (GCG) at the Bank;*

- b. Melakukan tindakan pidana dan/atau hal yang terindikasi tindak pidana; dan/atau
 - c. Melakukan tindakan dan hal yang dapat merugikan, berpotensi merugikan, dan/atau mengurangi keuntungan Bank.
8. Dalam hal terdapat benturan kepentingan atau potensi benturan kepentingan dari calon anggota Dewan Komisaris sehubungan dengan pencalonan yang bersangkutan pada Bank, calon yang bersangkutan mengungkapkan benturan kepentingan dalam proses penilaian kemampuan dan kepatutan.
 9. Dalam hal berdasarkan penilaian Otoritas Jasa Keuangan terdapat benturan kepentingan atau potensi benturan kepentingan dari calon Komisaris Independen atau calon Komisaris Non Independen yang terkait dengan Bank sehubungan dengan pencalonan yang bersangkutan, Otoritas Jasa Keuangan berwenang menetapkan tindakan pengawasan yang diperlukan.
 10. Dewan komisaris yang dengan sengaja :
 - a. membuat atau menyebabkan adanya pencatatan palsu dalam pembukuan atau dalam proses laporan, maupun dalam dokumen atau laporan kegiatan usaha, laporan transaksi atau rekening suatu bank;
 - b. menghilangkan atau tidak memasukkan atau menyebabkan tidak dilakukannya pencatatan dalam pembukuan atau dalam laporan, maupun dalam dokumen atau laporan kegiatan usaha, laporan transaksi atau rekening suatu bank;
 - c. mengubah, mengaburkan, menyembunyikan, menghapus, atau menghilangkan adanya suatu pencatatan dalam pembukuan atau dalam laporan, maupun dalam dokumen atau laporan kegiatan usaha, laporan transaksi atau rekening suatu bank, atau dengan sengaja mengubah, mengaburkan, menghilangkan, menyembunyikan atau merusak catatan pembukuan tersebut diancam dengan pidana penjara sekurang-kurangnya 5 (lima) tahun dan paling lama 15 (lima belas) tahun serta denda sekurang-kurangnya
- b. *Take criminal actions and/or things that are indicated as criminal acts; and/or*
 - c. *Take actions and things that can be detrimental, potentially detrimental, and/or reduce the Bank's profits.*
8. *In the event that there is a conflict of interest or potential conflict of interest from a candidate for member of the Board of Commissioners in connection with the nomination of the person concerned at the Bank, the candidate concerned shall disclose the conflict of interest in the fit and proper assessment process.*
 9. *In the event that based on the Financial Services Authority's assessment there is a conflict of interest or potential conflict of interest from a candidate for Independent Commissioner or candidate for Non-Independent Commissioner related to the Bank in connection with the nomination of the person concerned, the Financial Services Authority has the authority to determine the necessary supervisory actions.*
 10. *Board of Commissioners who intentionally:*
 - a. *making or causing false records in bookkeeping or in the reporting process, or in documents or reports of business activities, transaction reports or bank accounts;*
 - b. *eliminating or not including or causing no records to be made in bookkeeping or in reports, or in documents or reports of business activities, transaction reports or bank accounts;*
 - c. *changing, obscuring, hiding, deleting, or eliminating any records in bookkeeping or in reports, or in documents or reports of business activities, transaction reports or bank accounts, or intentionally changing, obscuring, eliminating, hiding or damaging the bookkeeping records shall be subject to imprisonment of at least 5 (five) years and a maximum of 15 (fifteen) years and a fine of at least.*

Etika dan Waktu Kerja

Kebijakan terkait etika dan waktu kerja Dewan Komisaris telah tertuang dalam Pedoman dan Tata Tertib Dewan Komisaris Bank Sahabat Sampoerna, sebagai berikut:

1. Dewan Komisaris wajib menyediakan waktu yang cukup untuk melaksanakan tugas dan tanggung jawabnya secara optimal. Penyediaan waktu yang cukup dicerminkan antara lain oleh kehadiran yang bersangkutan dalam Rapat Dewan Komisaris, pelaksanaan tugas-tugas Dewan Komisaris, dan lain-lain.
2. Jika anggota Dewan Komisaris berencana tidak dapat melaksanakan tugasnya dalam jangka waktu melampaui 3 bulan berturut-turut, maka rencana tersebut harus diajukan dengan surat resmi terhadap Komisaris Utama

Ethics and Working Hours

The policy related to ethics and working hours of the Board of Commissioners has been stated in the Guidelines and Rules of Procedure of the Board of Commissioners of Bank Sahabat Sampoerna, as follows:

1. *The Board of Commissioners must provide sufficient time to carry out its duties and responsibilities optimally. The provision of sufficient time is reflected, among others, by the presence of the person concerned in the Board of Commissioners Meeting, the implementation of the duties of the Board of Commissioners, and others.*
2. *If a member of the Board of Commissioners plans to be unable to carry out his duties for a period exceeding 3 consecutive months, then the plan must be submitted with an official letter to the President Commissioner*

- disertai dengan alasannya dan selanjutnya rencana tersebut harus disetujui terlebih dahulu oleh Dewan Komisaris.
3. Jika karena suatu hal, anggota Dewan Komisaris berada dalam status hukum sebagai tersangka atau terdakwa sehingga tidak dapat melakukan kewajibannya, maka hal tersebut harus dilaporkan kepada Dewan Komisaris dengan tembusan kepada Direksi, untuk selanjutnya melalui Rapat Dewan Komisaris akan diputuskan status yang bersangkutan.
 4. Dewan Komisaris harus berorientasi kepada pemenuhan asas kepatuhan terhadap hukum perundangan yang berlaku.
 5. Dewan Komisaris tidak boleh memanfaatkan informasi yang diperoleh dari Bank untuk mengambil keputusan-keputusan untuk keuntungan dan kepentingan pribadi, keluarga, dan pihak yang terafiliasi.
 6. Dewan Komisaris tidak boleh menerima pendapatan maupun keuntungan pribadi dari Bank selain dari remunerasi dan fasilitas lain yang telah ditetapkan dalam kebijakan Bank dan disetujui oleh RUPS.
 7. Dewan Komisaris wajib mengutamakan kepentingan Bank dengan penerapan asas profesionalisme dan integritas, serta bekerja dan berperilaku dengan standar yang tinggi.
 8. Dewan Komisaris tidak boleh menyimpan dan menggandakan dokumen-dokumen serta menguasai aset Bank untuk kepentingan pribadi.
 9. Kecuali diatur di dalam peraturan perundangan yang berlaku dan Anggaran Dasar, Dewan Komisaris tidak berhak mewakili Bank meskipun mendapat kuasa dari Direksi, kecuali bila karena tak berfungsinya Direksi, Dewan Komisaris mengambil alih peran Direksi.
 10. Setiap anggota Dewan Komisaris tidak boleh menerima, memberikan atau menawarkan sesuatu dari/kepada Pejabat Negara dan mitra bisnis.
 11. Mayoritas anggota Dewan Komisaris dilarang saling memiliki hubungan keluarga sampai dengan derajat kedua dengan sesama anggota Dewan Komisaris dan/atau anggota Direksi.
 12. Dewan Komisaris wajib menjaga informasi yang bersifat rahasia tentang Bank, atau informasi tentang nasabah dan rekanan kepada siapa pun yang tidak berhak mengetahuinya, atau pihak yang tidak berkepentingan terhadap informasi tersebut, kecuali diminta oleh pihak yang berwenang sesuai ketentuan hukum yang berlaku.
 13. Anggota Dewan Komisaris beserta keluarga yang akan melakukan investasi dan kepemilikan saham dalam Bank maupun anak perusahaan harus dengan persetujuan sekurang-kurangnya 2/3 dari jumlah anggota Dewan Komisaris lainnya atau sesuai dengan ketentuan yang berlaku.
 14. Etika kerja Dewan Komisaris juga berpedoman kepada Kebijakan Kode Etik Bank.
- accompanied by the reasons and then the plan must be approved first by the Board of Commissioners.*
3. *If for some reason, a member of the Board of Commissioners is in a legal status as a suspect or defendant so that he cannot carry out his duties, then this must be reported to the Board of Commissioners with a copy to the Board of Directors, and then through the Board of Commissioners Meeting the status of the person concerned will be decided.*
 4. *The Board of Commissioners must be oriented towards fulfilling the principle of compliance with applicable laws and regulations.*
 5. *The Board of Commissioners may not use information obtained from the Bank to make decisions for personal, family, and affiliated party benefits and interests.*
 6. *The Board of Commissioners may not receive income or personal benefits from the Bank other than remuneration and other facilities that have been determined in the Bank's policies and approved by the GMS.*
 7. *The Board of Commissioners must prioritize the interests of the Bank by implementing the principles of professionalism and integrity, and working and behaving with high standards.*
 8. *The Board of Commissioners may not store and duplicate documents and control Bank assets for personal interests.*
 9. *Unless regulated in the applicable laws and regulations and the Articles of Association, the Board of Commissioners has no right to represent the Bank even though it has received power of attorney from the Board of Directors, unless due to the Board of Directors not functioning, the Board of Commissioners takes over the role of the Board of Directors.*
 10. *Each member of the Board of Commissioners may not accept, give or offer anything from/to State Officials and business partners.*
 11. *The majority of members of the Board of Commissioners are prohibited from having family relationships up to the second degree with fellow members of the Board of Commissioners and/or members of the Board of Directors.*
 12. *The Board of Commissioners is required to keep confidential information about the Bank, or information about customers and partners from anyone who is not entitled to know it, or parties who are not interested in the information, unless requested by the authorized party in accordance with applicable laws.*
 13. *Members of the Board of Commissioners and their families who will invest and own shares in the Bank or its subsidiaries must have the approval of at least 2/3 of the other members of the Board of Commissioners or in accordance with applicable provisions.*
 14. *The work ethics of the Board of Commissioners are also guided by the Bank's Code of Conduct Policy.*

Jenis-Jenis Keputusan yang Perlu Mendapatkan Persetujuan Dewan Komisaris

Dalam melaksanakan fungsi pengelolaan perusahaan, terdapat sejumlah keputusan Direksi yang memerlukan persetujuan Dewan Komisaris, di antaranya:

1. Kebijakan, penetapan, serta penerapan strategi anti-*fraud*, anti pencucian uang pencegahan pendanaan terorisme dan pencegahan pendanaan proliferasi senjata pemusnah massal (APU-PPT & PPPSPM), batas minimum pemberian kredit (BMPK), dan strategi Bank lainnya sesuai ketentuan yang berlaku;
2. Rencana Aksi Keuangan Berkelanjutan yang disusun oleh Direksi; dan
3. Hal-hal lain yang ditetapkan dalam Anggaran Dasar Bank atau peraturan perundang-undangan yang berlaku.

Pelaksanaan Rapat Internal Dewan Komisaris

Sebagaimana diatur dalam Pedoman dan Tata Tertib, Dewan Komisaris wajib melaksanakan rapat internal minimal 1 (satu) kali dalam 2 (dua) bulan. Sepanjang tahun 2024, Dewan Komisaris melaksanakan rapat sebanyak 11 (sebelas) kali, baik secara daring maupun tatap muka. Adapun frekuensi kehadiran dan agenda rapat internal sepanjang tahun 2024 dapat dilihat sebagai berikut:

Nama <i>Name</i>	Jabatan <i>Position</i>	Total Rapat <i>Total Meeting</i>	Kehadiran <i>Attendance</i>	Persentase (%) <i>Percentage</i>
Budi Setiawan Halim	Komisaris Utama <i>President Commissioner</i>	11	11	100%
Harry Mulyadi Santoso	Komisaris <i>Commissioner</i>	11	11	100%
Khoe Minhari Handikusuma	Komisaris Independen <i>Independent Commissioner</i>	11	11	100%
Anggar Budhi Nuraini	Komisaris Independen <i>Independent Commissioner</i>	11	11	100%
Rata-Rata <i>Average</i>				100%

Tanggal <i>Date</i>	Agenda <i>Agenda</i>	Kehadiran <i>Attendance</i>			
		BSH	HMS	KMH	ABN
25 Januari <i>January 25</i>	<ul style="list-style-type: none"> • Batas Deviasi • Persetujuan notulen rapat Dewan Komisaris 23 November 2023 • Rangkuman Portofolio bulanan per Desember 2023 • Laporan Komite Audit • Laporan Komite Pemantau Risiko • <i>Deviation Limit</i> • <i>Approval of Board of Commissioners meeting minutes November 23, 2023</i> • <i>Monthly Portfolio Summary as of December 2023</i> • <i>Audit Committee Report</i> • <i>Risk Monitoring Committee Report</i> 	v	v	v	v

Resolutions Requiring Board of Commissioners' Approval

In carrying out the company's management function, there are a number of Board of Directors' decisions that require the Board of Commissioners' approval, including:

1. *Policies, determination, and implementation of anti-fraud strategies, anti-money laundering, prevention of terrorism financing, and prevention of financing for the proliferation of weapons of mass destruction (APU-PPT & PPPSPM), minimum credit limit (BMPK), and other Bank strategies in accordance with applicable provisions;*
2. *Sustainable Financial Action Plan prepared by the Board of Directors; and*
3. *Other matters stipulated in the Bank's Articles of Association or applicable laws and regulations.*

Implementation of Internal Meetings of the Board of Commissioners

As stipulated in the Guidelines and Rules of Procedure, the Board of Commissioners is required to hold internal meetings at least 1 (one) time in 2 (two) months. Throughout 2024, the Board of Commissioners held meetings as many as 11 (eleven) times, both online and face-to-face. The frequency of attendance and agenda of internal meetings throughout 2024 can be seen as follows:

Tanggal Date	Agenda Agenda	Kehadiran Attendance			
		BSH	HMS	KMH	ABN
22 Februari February 22	<ul style="list-style-type: none"> • Persetujuan notulen rapat Dewan Komisaris 25 Januari 2024 • Rangkuman Portofolio bulanan per Januari 2024 • Laporan Komite Audit • Laporan Komite Pemantau Risiko • <i>Approval of the minutes of the January 25, 2024 Board of Commissioners meeting</i> • <i>Monthly Portfolio Summary as of January 2024</i> • <i>Audit Committee Report</i> • <i>Risk Monitoring Committee Report</i> 	v	v	v	v
21 Maret March 21	<ul style="list-style-type: none"> • Persetujuan notulen rapat Dewan Komisaris 22 Februari 2024 • Rangkuman Portofolio bulanan per Februari 2024 • Laporan Komite Audit • Laporan Komite Pemantau Risiko • <i>Approval of the minutes of the Board of Commissioners meeting of February 22, 2024</i> • <i>Monthly Portfolio Summary as of February 2024</i> • <i>Audit Committee Report</i> • <i>Risk Monitoring Committee Report</i> 	v	v	v	v
30 April April 30	<ul style="list-style-type: none"> • Persetujuan notulen rapat Dewan Komisaris 21 Maret 2024 • Rangkuman Portofolio bulanan per Maret 2024 • Laporan Komite Audit • Laporan Komite Pemantau Risiko • <i>Approval of the minutes of the Board of Commissioners meeting of March 21, 2024</i> • <i>Monthly Portfolio Summary as of March 2024</i> • <i>Audit Committee Report</i> • <i>Risk Monitoring Committee Report</i> 	v	v	v	v
30 Mei May 30	<ul style="list-style-type: none"> • Persetujuan notulen rapat Dewan Komisaris 30 April 2024 • Rangkuman Portofolio bulanan per April 2024 • ESME Portofolio dan AYDA Update • Laporan Komite Audit • Laporan Komite Pemantau Risiko • <i>Approval of the minutes of the Board of Commissioners meeting of April 30, 2024</i> • <i>Monthly Portfolio Summary as of April 2024</i> • <i>ESME Portfolio and AYDA Update</i> • <i>Audit Committee Report</i> • <i>Risk Monitoring Committee Report</i> 	v	v	v	v
28 Juni June 28	<ul style="list-style-type: none"> • Persetujuan notulen rapat Dewan Komisaris 30 Mei 2024 • Rangkuman Portofolio bulanan per Mei 2024 • Laporan Komite Audit • Laporan Komite Pemantau Risiko • <i>Approval of the minutes of the May 30, 2024 Board of Commissioners meeting</i> • <i>Monthly Portfolio Summary as of May 2024</i> • <i>Audit Committee Report</i> • <i>Risk Monitoring Committee Report</i> 	v	v	v	v
25 Juli July 25	<ul style="list-style-type: none"> • Persetujuan notulen rapat Dewan Komisaris 28 Juni 2024 • Rangkuman Portofolio bulanan per Juni 2024 • Laporan Komite Audit • Laporan Komite Pemantau Risiko • <i>Approval of the minutes of the June 28, 2024 Board of Commissioners meeting</i> • <i>Monthly Portfolio Summary as of June 2024</i> • <i>Audit Committee Report</i> • <i>Risk Monitoring Committee Report</i> 	v	v	v	v

Tanggal Date	Agenda Agenda	Kehadiran Attendance			
		BSH	HMS	KMH	ABN
15 Agustus August 15	<ul style="list-style-type: none"> • Persetujuan notulen rapat Dewan Komisaris 25 Juli 2024 • Rangkuman Portofolio bulanan per Juli 2024 • Laporan Komite Audit • Laporan Komite Pemantau Risiko • <i>Approval of the minutes of the July 25, 2024 Board of Commissioners meeting</i> • <i>Monthly Portfolio Summary as of July 2024</i> • <i>Audit Committee Report</i> • <i>Risk Monitoring Committee Report</i> 	v	v	v	v
19 September September 19	<ul style="list-style-type: none"> • Persetujuan notulen rapat Dewan Komisaris 15 Agustus 2024 • Rangkuman Portofolio bulanan per Agustus 2024 • Laporan Komite Audit • Laporan Komite Pemantau Risiko • <i>Approval of Board of Commissioners meeting minutes August 15, 2024</i> • <i>Monthly Portfolio Summary as of August 2024</i> • <i>Audit Committee Report</i> • <i>Risk Monitoring Committee Report</i> 	v	v	v	v
23 Oktober October 23	<ul style="list-style-type: none"> • Persetujuan notulen rapat Dewan Komisaris 19 September 2024 • Rangkuman Portofolio bulanan per September 2024 • Laporan Komite Audit • Laporan Komite Pemantau Risiko • <i>Approval of the minutes of the September 19, 2024 Board of Commissioners meeting</i> • <i>Monthly Portfolio Summary as of September 2024</i> • <i>Audit Committee Report</i> • <i>Risk Monitoring Committee Report</i> 	v	v	v	v
21 November November 21	<ul style="list-style-type: none"> • Persetujuan notulen rapat Dewan Komisaris 23 oktober 2024 • Resolution Plan & Recovery Plan BSS 2024 • Rangkuman Portofolio bulanan per Oktober 2024 • Laporan Komite Audit • Laporan Komite Pemantau Risiko • <i>Approval of the minutes of the Board of Commissioners meeting on October 23, 2024</i> • <i>Resolution Plan & Recovery Plan BSS 2024</i> • <i>Monthly Portfolio Summary as of October 2024</i> • <i>Audit Committee Report</i> • <i>Risk Monitoring Committee Report</i> 	v	v	v	v

Keterangan / Description:
 BSH : Budi Setiawan Halim
 HMS : Harry Mulyadi Santoso
 KMH : Khoe Minhari Handikusuma
 ABN : Anggar Budhi Nuraini

Rapat Gabungan Dewan Komisaris bersama Direksi

Dewan Komisaris wajib mengadakan rapat Direksi secara berkala minimal 1 (satu) kali dalam 4 (empat) bulan atau paling kurang 3 (tiga) kali dalam setahun. Sepanjang tahun 2024, Dewan Komisaris telah menyelenggarakan rapat bersama Direksi sebanyak 11 (sebelas) kali, baik secara daring maupun luring. Adapun frekuensi kehadiran dan agenda rapat gabungan Dewan Komisaris bersama Direksi sepanjang tahun 2024 dapat dilihat sebagai berikut:

Joint Meeting of the Board of Commissioners with the Board of Directors

The Board of Commissioners is required to hold regular Board of Directors meetings at least 1 (one) time in 4 (four) months or at least 3 (three) times a year. Throughout 2024, the Board of Commissioners has held joint meetings with the Board of Directors as many as 11 (eleven) times, both online and offline. The frequency of attendance and agenda of joint meetings of the Board of Commissioners with the Board of Directors throughout 2024 can be seen as follows:

Nama Name	Jabatan Position	Total Rapat Total Meeting	Kehadiran Attendance	Persentase (%) Percentage
Dewan Komisaris <i>Board of Commissioners</i>				
Budi Setiawan Halim	Komisaris Utama <i>President Commissioner</i>	11	11	100%
Harry Mulyadi Santoso	Komisaris <i>Commissioner</i>	11	11	100%
Khoe Minhari Handikusuma	Komisaris Independen <i>Independent Commissioner</i>	11	11	100%
Anggar Budhi Nuraini	Komisaris Independen <i>Independent Commissioner</i>	11	11	100%
Rata-Rata <i>Average</i>				100%
Direksi <i>Board of Directors</i>				
Ali Rukmijah	Direktur Utama <i>President Director</i>	11	10	91%
Henky Suryaputra	Direktur Keuangan & Perencanaan Bisnis <i>Director of Finance & Business Planning</i>	11	10	91%
Hendra Rahardja	Direktur Teknologi Informasi <i>Director of Information Technology</i>	11	11	100%
Rudy Mahasin	Direktur Bisnis UMKM <i>Director of UMKM Business</i>	11	11	100%
A. Dendi Hardiansyah	Direktur Kepatuhan & Manajemen Risiko <i>Director of Compliance & Risk Management</i>	11	11	100%
Rata-Rata <i>Average</i>				96%

Tanggal Date	Agenda Agenda	Kehadiran Attendance								
		BSH	HMS	KMH	ABN	AR	HS	HR	RM	ADH
25 Januari January 25	<ul style="list-style-type: none"> Persetujuan Notulen Rapat Dewan Komisaris & Direksi 23 November 2023 Paparan Kinerja Keuangan per Desember 2023 Penyampaian Hasil Pemeriksaan OJK Tahun 2023 tentang Penerapan APUPPT & PPPSM di BSS Penguatan struktur organisasi Approval of Minutes of the Board of Commissioners & Directors Meeting November 23, 2023 Presentation of Financial Performance as of December 2023 Submission of OJK Examination Results in 2023 on the Implementation of APUPPT & PPPSM at BSS Strengthening of organizational structure 	v	v	v	v	v	v	v	v	v
22 Februari February 22	<ul style="list-style-type: none"> Persetujuan Notulen Rapat Dewan Komisaris & Direksi 25 Januari 2024 Paparan Kinerja Keuangan per Januari 2024 Penyampaian hasil FIR on ML/TF Review kebijakan deviasi dan persetujuan khusus Vintage analysis segmen bisnis ESME dan SME Approval of Minutes of the Board of Commissioners & Directors Meeting January 25, 2024 Presentation of Financial Performance as of January 2024 Submission of FIR on ML/TF Review of deviation and special purpose policies Vintage analysis of ESME and SME business segments 	v	v	v	v	x	v	v	v	v
21 Maret March 21	<ul style="list-style-type: none"> Persetujuan Notulen Rapat Dewan Komisaris & Direksi 22 Februari 2024 Paparan Kinerja Keuangan per Februari 2024 APU PPT & PPPSM update Approval of Minutes of the Board of Commissioners & Directors Meeting February 22, 2024 Presentation of Financial Performance as of February 2024 AML/CFT & PPPSM update 	v	v	v	v	v	v	v	v	v
30 April April 30	<ul style="list-style-type: none"> Persetujuan Notulen Rapat Dewan Komisaris & Direksi 21 Maret 2024 Paparan Kinerja Keuangan per Maret 2024 APU PPT & PPPSM update Approval of Minutes of the Board of Commissioners & Directors Meeting March 21, 2024 Presentation of Financial Performance as of March 2024 AML/CFT & PPPSM update 	v	v	v	v	v	v	v	v	v
31 Mei May 30	<ul style="list-style-type: none"> Persetujuan Notulen Rapat Dewan Komisaris & Direksi 30 April 2024 Paparan Kinerja Keuangan per April 2024 APU PPT & PPPSM update Approval of Minutes of Board of Commissioners & Directors Meeting April 30, 2024 Presentation of Financial Performance as of April 2024 AML/CFT & PPPSM update 	v	v	v	v	v	v	v	v	v

Tanggal Date	Agenda Agenda	Kehadiran Attendance								
		BSH	HMS	KMH	ABN	AR	HS	HR	RM	ADH
28 Juni June 28	<ul style="list-style-type: none"> • Persetujuan Notulen Rapat Dewan Komisaris & Direksi 31 Mei 2024 • Paparan Kinerja Keuangan per Mei 2024 • APU PPT & PPPSM update • Approval of Minutes of the Board of Commissioners & Directors Meeting May 31, 2024 • Presentation of Financial Performance as of May 2024 • AML/CFT & PPPSM update 	v	v	v	v	v	v	v	v	v
25 Juli July 25	<ul style="list-style-type: none"> • Persetujuan Notulen Rapat Dewan Komisaris & Direksi 28 Juni 2024 • Paparan Kinerja Keuangan per Juni 2024 • APU PPT & PPPSM update • Approval of Minutes of the June 28, 2024 Board of Commissioners & Directors Meeting • Presentation of Financial Performance as of June 2024 • AML/CFT & PPPSM update 	v	v	v	v	v	v	v	v	v
15 Agustus August 15	<ul style="list-style-type: none"> • Persetujuan Notulen Rapat Dewan Komisaris & Direksi 25 Juli 2024 • Paparan Kinerja Keuangan per Juli 2024 • APU PPT & PPPSM update • Approval of Minutes of July 25, 2024 Board of Commissioners & Directors Meeting • Presentation of Financial Performance as of July 2024 • AML/CFT & PPPSM update 	v	v	v	v	v	v	v	v	v
19 September September 19	<ul style="list-style-type: none"> • Persetujuan Notulen Rapat Dewan Komisaris & Direksi 15 Agustus 2024 • Paparan Kinerja Keuangan per Agustus 2024 • APU PPT & PPPSM update • Approval of Minutes of the Board of Commissioners & Directors Meeting August 15, 2024 • Presentation of Financial Performance as of August 2024 • AML/CFT & PPPSM update 	v	v	v	v	v	v	v	v	v
23 Oktober October 23	<ul style="list-style-type: none"> • Persetujuan Notulen Rapat Dewan Komisaris & Direksi 19 September 2024 • Presentasi compliance APU PPT • Paparan Kinerja Keuangan per September 2024 • Reviu profitabilitas berdasarkan segmen dan produk • CASA & Funding Initiative update • Approval of Minutes of the September 19, 2024 Board of Commissioners & Directors Meeting • AML/CFT compliance presentation • Financial performance presentation as of September 2024 • Review of profitability by segment and product • CASA & Funding Initiative update 	v	v	v	v	v	x	v	v	v
21 November November 21	<ul style="list-style-type: none"> • Persetujuan Notulen Rapat Dewan Komisaris & Direksi 23 oktober 2024 • Presentasi compliance APU PPT • Paparan Kinerja Keuangan per Oktober 2024 • Approval of Minutes of the Board of Commissioners & Directors Meeting on October 23, 2024 • AML/CFT compliance presentation • Presentation of Financial Performance as of October 2024 	v	v	v	v	v	v	v	v	v

Keterangan | Description:

BSH : Budi Setiawan Halim

HMS : Harry Mulyadi Santoso

KMH : Khoe Minhari Handikusuma

ABN : Anggar Budhi Nuraini

AR : Ali Rukmijah

HS : Henky Suryaputra

HR : Hendra Rahardja

RM : Rudy Mahasin

ADH : A. Dendi Hardiansyah

Kepemilikan Saham

Sampai dengan 31 Desember 2024, seluruh anggota Dewan Komisaris Bank Sahabat Sampoerna tidak memiliki saham di dalam Bank lain. Informasi tentang Kepemilikan Saham Dewan Komisaris telah diungkapkan pada Bab Profil Perusahaan dalam Laporan Tahunan ini.

Hubungan Afiliasi

Berikut disampaikan informasi terkait hubungan afiliasi antara Dewan Komisaris dengan Komisaris lainnya, Direksi, serta Pemegang Saham Pengendali.

Nama Name	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	Pemegang Saham Pengendali Controlling Shareholders	Keterangan Description
Budi Setiawan Halim	x	x	v	Hubungan Kepengurusan Management Relationship
Harry Mulyadi Santoso	x	x	x	-
Khoe Minhari Handikusuma	x	x	x	-
Anggar Budhi Nuraini	x	x	x	-

Keterangan | Description:

v: Ada | Yes

x: Tidak ada | No

Rangkap Jabatan

Pedoman dan Tata Tertib Dewan Komisaris telah mengatur terkait kebijakan rangkap jabatan Dewan Komisaris, antara lain:

- Anggota Dewan Komisaris hanya dapat merangkap jabatan sebagai:
 - Anggota Dewan Komisaris, Direksi, atau Pejabat Eksekutif pada 1 lembaga/perusahaan bukan lembaga keuangan; atau
 - Anggota Dewan Komisaris, Direksi, atau Pejabat Eksekutif yang melaksanakan fungsi pengawasan pada 1 perusahaan anak bukan bank yang dikendalikan oleh Bank.
- Tidak termasuk rangkap jabatan, apabila:
 - Anggota Dewan Komisaris non-Independen menjalankan tugas fungsional dari Pemegang Saham Bank yang berbentuk badan hukum pada kelompok usahanya;
 - Anggota Dewan Komisaris menduduki jabatan pada organisasi atau lembaga nirlaba sepanjang yang bersangkutan tidak mengabaikan pelaksanaan tugas dan tanggung jawab sebagai anggota Dewan Komisaris Bank; dan/atau
 - Anggota Dewan Komisaris menjabat sebagai anggota Direksi, anggota Dewan Komisaris atau Pejabat Eksekutif yang melaksanakan fungsi pengawasan pada 1 Entitas Anak bukan bank yang dikendalikan oleh Bank.

Share Ownership

As of December 31, 2024, all members of the Board of Commissioners of Bank Sahabat Sampoerna do not own shares in other banks. Information on the Share Ownership of the Board of Commissioners has been disclosed in the Company Profile Chapter of this Annual Report.

Affiliated Relationships

The following is information regarding the affiliated relationships between the Board of Commissioners and other Commissioners, the Board of Directors, and Controlling Shareholders.

Concurrent Positions

The Guidelines and Rules of Procedure of the Board of Commissioners have regulated the policy of concurrent positions of the Board of Commissioners, including:

- Members of the Board of Commissioners may only hold dual positions as:
 - Members of the Board of Commissioners, Board of Directors, or Executive Officers at 1 non-financial institution/company; or
 - Members of the Board of Commissioners, Board of Directors, or Executive Officers who carry out supervisory functions at 1 non-bank subsidiary controlled by the Bank.
- Does not considered to be a concurrent position, if:
 - Non-Independent members of the Board of Commissioners carry out functional duties from the Bank's Shareholders in the form of legal entities in their business groups;
 - Members of the Board of Commissioners hold positions in non-profit organizations or institutions as long as the person concerned does not neglect the implementation of duties and responsibilities as members of the Board of Commissioners of the Bank; and/or
 - Members of the Board of Commissioners serve as members of the Board of Directors, members of the Board of Commissioners or Executive Officers who carry out supervisory functions at 1 non-bank subsidiary controlled by the Bank.

Rangkap jabatan masing-masing anggota Dewan Komisaris Bank Sahabat Sampoerna di tahun 2024 dapat dilihat sebagai berikut:

The dual positions of each member of the Board of Commissioners of Bank Sahabat Sampoerna in 2024 can be seen as follows:

Nama <i>Name</i>	Jabatan di Bank Sahabat Sampoerna <i>Position at Bank Sahabat Sampoerna</i>	Perusahaan/Instansi Lain <i>Other Company/Institution</i>	
		Nama Perusahaan <i>Company Name</i>	Jabatan <i>Position</i>
Budi Setiawan Halim	<ul style="list-style-type: none"> Komisaris Utama Anggota Komite Remunerasi dan Nominasi <i>President Commissioner</i> <i>Member of the Remuneration and Nomination Committee</i> 	PT Sampoerna Agro Tbk*)	Direktur Utama <i>President Director</i>
Harry Mulyadi Santoso	<ul style="list-style-type: none"> Komisaris Anggota Komite Pemantau Risiko <i>Commissioner</i> <i>Member of the Risk Monitoring Committee</i> 	PT Dinamika Mitra Sukses Makmur*)	Komisaris <i>Commissioner</i>
Khoe Minhari Handikusuma	<ul style="list-style-type: none"> Komisaris Independen Ketua Komite Remunerasi dan Nominasi Ketua Komite Pemantau Risiko <i>Independent Commissioner</i> <i>Chairman of the Remuneration and Nomination Committee</i> <i>Chairman of the Risk Monitoring Committee</i> 	PT Pandawa Gagas Rahaerja*)	Komisaris <i>Commissioner</i>
Anggar Budhi Nuraini	<ul style="list-style-type: none"> Komisaris Independen Ketua Komite Audit <i>Independent Commissioner</i> <i>Chairman of the Audit Committee</i> 	-	-

*) Bukan lembaga/perusahaan keuangan / *Non-financial institution/company.*

Kebijakan Keberagaman Komposisi Dewan Komisaris

Bank Sahabat Sampoerna belum menyusun dan menetapkan kebijakan terkait keberagaman komposisi Dewan Komisaris hingga tahun buku 2024. Meski demikian, komposisi anggota Dewan Komisaris telah disesuaikan dengan ketentuan perundang-undangan yang berlaku dengan memperhatikan aspek keberagaman, antara lain:

Board of Commissioners Composition Diversity Policy

Bank Sahabat Sampoerna has not yet prepared and established a policy regarding the diversity of the composition of the Board of Commissioners until the 2024 financial year. However, the composition of the members of the Board of Commissioners has been adjusted to the provisions of applicable laws and regulations by taking into account aspects of diversity, including:

Aspek Keberagaman <i>Diversity Aspect</i>	Penjelasan <i>Explanation</i>	
Pendidikan <i>Education</i>	Latar belakang pendidikan Dewan Komisaris beragam, mulai dari sarjana sampai master, dengan kompetensi di bidang Ekonomi, Sains, Keuangan, dan Administrasi Bisnis. <i>The educational backgrounds of the members of the Board of Commissioners are diverse, ranging from bachelor's to master's degrees, with competencies in the fields of Economics, Science, Finance, and Business Administration.</i>	Komposisi Dewan Komisaris telah memenuhi unsur keberagaman, yaitu perpaduan dari sisi pendidikan, pengalaman kerja, dan usia. <i>The composition of the Board of Commissioners has fulfilled the element of diversity, which is a combination of education, work experience, and age.</i>
Pengalaman Kerja <i>Work Experience</i>	Keberagaman pengalaman kerja anggota Dewan Komisaris berasal dari profesional pada perbankan, perusahaan non keuangan, dan konsultan. <i>The diversity of work experience of members of the Board of Commissioners comes from professionals in banking, nonfinancial companies, and consultants.</i>	
Usia <i>Age</i>	Usia Dewan Komisaris Bank antara 52-62 tahun. <i>The age range of the members of the Board of Commissioners of the Bank is between 56-62 years.</i>	
Jenis Kelamin <i>Gender</i>	Bank Sahabat Sampoerna mempunyai anggota Dewan Komisaris yang berjenis kelamin wanita. <i>Bank Sahabat Sampoerna has a female member in its Board of Commissioners composition.</i>	

Program Pengenalan bagi Dewan Komisaris Baru

Bank Sahabat Sampoerna memiliki kebijakan bagi anggota Dewan Komisaris yang baru diangkat wajib untuk mengikuti program pengenalan perusahaan. Program pengenalan tersebut dilakukan untuk memberikan pemahaman mengenai tugas dan tanggung jawab sebagai anggota Dewan Komisaris agar dijalankan sebaik-baiknya. Kegiatan ini juga bertujuan agar anggota Dewan Komisaris dapat memahami latar belakang dan kegiatan usaha Bank agar dapat mempermudah dan melancarkan pelaksanaan tugas Dewan Komisaris secara efektif.

Pada tahun 2024, Bank tidak melaksanakan program pengenalan bagi anggota Dewan Komisaris baru sehubungan dengan tidak adanya perubahan komposisi dan susunan Dewan Komisaris Bank Sahabat Sampoerna.

Pengembangan Kompetensi Dewan Komisaris Tahun 2024

Bank Sahabat Sampoerna senantiasa memfasilitasi seluruh Insan Bank di seluruh level organisasi untuk mengikuti program pengembangan kompetensi guna memperluas wawasan dan meningkatkan kompetensi yang dimiliki dalam menunjang pelaksanaan tugas dan tanggung jawab. Informasi pengembangan kompetensi yang diikuti oleh Dewan Komisaris sepanjang tahun 2024 diuraikan sebagai berikut:

Introduction Program for New Board of Commissioners

Bank Sahabat Sampoerna has a policy that newly appointed members of the Board of Commissioners are required to participate in the company's introduction program. The introduction program is carried out to provide an understanding of the duties and responsibilities as members of the Board of Commissioners so that they are carried out as well as possible. This activity also aims to enable members of the Board of Commissioners to understand the background and business activities of the Bank in order to facilitate and facilitate the implementation of the Board of Commissioners' duties effectively.

In 2024, the Bank did not conduct an introduction program for new members of the Board of Commissioners, as there were no changes in the composition or structure of the Board of Commissioners of Bank Sahabat Sampoerna.

Board of Commissioners Competency Development in 2024

Bank Sahabat Sampoerna always facilitates all Bank Personnel at all levels of the organization to participate in competency development programs to broaden their horizons and improve their competencies in supporting the implementation of their duties and responsibilities. Information on competency development participated in by the Board of Commissioners throughout 2024 is described as follows:

Nama Name	Jabatan Position	Topik Pelatihan Topic of Training	Penyelenggara Organizer	Tanggal Pelatihan Date of Training
Budi Setiawan Halim	Komisaris Utama President Commissioner	Sertifikasi Manajemen Risiko Jenjang 6 Risk Management Certification Level 6	Garda	21 Februari 2024 February 21, 2024
Harry Mulyadi Santoso	Komisaris Commissioner	Sertifikasi Manajemen Risiko Jenjang 6 Risk Management Certification Level 6	Garda	21 Februari 2024 February 21, 2024
Khoe Minhari Handikusuma	Komisaris Independen Independent Commissioner	Sertifikasi Manajemen Risiko Jenjang 7 Risk Management Certification Level 7	Garda	6 Agustus 2024 August 6, 2024
Anggar Budhi Nuraini	Komisaris Independen Independent Commissioner	Sertifikasi Manajemen Risiko Jenjang 6 Risk Management Certification Level 6	Garda	11 Januari 2024 January 11, 2024

Pelaksanaan Tugas Dewan Komisaris Tahun 2024

Sepanjang tahun 2024, seluruh anggota Dewan Komisaris telah melaksanakan tugas dan tanggung jawab dengan baik dan sesuai pedoman kerja berlaku, di antaranya :

1. Pelaksanaan Rencana Bisnis Bank, baik secara kuantitatif maupun kualitatif;
2. Faktor-faktor yang mempengaruhi kinerja Bank; dan
3. Upaya memperbaiki kinerja Bank.

Penilaian Kinerja Dewan Komisaris

Pedoman dan Tata Tertib Dewan Komisaris telah mengatur ketentuan penilaian dan pertanggungjawaban kinerja Dewan Komisaris, antara lain:

1. Penilaian dan pengukuran kinerja Dewan Komisaris, baik secara individu maupun kolektif, wajib dilakukan sekurang-kurangnya 1 kali dalam setahun dengan metode lainnya baik oleh pihak internal maupun menggunakan pihak ketiga. Ringkasan hasil penilaian tersebut wajib dituangkan dalam Laporan Tahunan.
2. Laporan pertanggungjawaban mengenai tugas-tugas pengawasan Dewan Komisaris selama tahun buku sebelumnya wajib disampaikan dan dimintakan persetujuan Pemegang Saham dalam RUPS Tahunan berikutnya.
3. Laporan hasil *self-assessment* terkait pelaksanaan Tata Kelola Perusahaan (GCG) wajib disampaikan kepada Otoritas Jasa Keuangan sesuai ketentuan yang berlaku, yaitu 2 kali dalam setahun (posisi Juni dan Desember).
4. Laporan pelaksanaan tugas pengawasan Dewan Komisaris terhadap realisasi Rencana Kerja Bank dilakukan 2 kali dalam setahun (posisi Juni dan Desember) paling lambat 2 bulan setelah bulan pelaporan.
5. Dewan Komisaris juga wajib membuat dan menyampaikan laporan lainnya kepada regulator terkait yang diprasyarakatkan berdasarkan ketentuan yang berlaku.

Pada tahun 2024, berdasarkan hasil *self-assessment* tata kelola perusahaan atas Aspek Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris memperoleh nilai komposit 1 atau "Low" Hasil penilaian tersebut telah diungkapkan pada uraian Hasil *Self-Assessment* Tata Kelola Perusahaan (GCG) di dalam Laporan Tahunan ini.

Penilaian Kinerja Komite di bawah Dewan Komisaris

Penilaian kinerja organ pendukung Dewan Komisaris dilakukan sebagai proses evaluasi untuk mengetahui pelaksanaan tugas dan pencapaian target dari masing-

Implementation of the Board of Commissioners' Duties in 2024

Throughout 2024, all members of the Board of Commissioners have carried out their duties and responsibilities properly and in accordance with applicable work guidelines, including:

1. *Implementation of the Bank's Business Plan, both quantitatively and qualitatively;*
2. *Factors affecting the Bank's performance; and*
3. *Efforts to improve the Bank's performance.*

Board of Commissioners' Performance Assessment

The Board of Commissioners' Guidelines and Rules of Procedure have regulated the provisions for the assessment and accountability of the Board of Commissioners' performance, including:

1. *Assessment and measurement of the Board of Commissioners' performance, both individually and collectively, must be carried out at least once a year using other methods, either by internal parties or using third parties. A summary of the assessment results must be included in the Annual Report.*
2. *An accountability report regarding the Board of Commissioners' supervisory duties during the previous financial year must be submitted and requested for approval by Shareholders at the next Annual GMS.*
3. *The report on the results of the self-assessment related to the implementation of Corporate Governance (GCG) must be submitted to the Financial Services Authority in accordance with applicable provisions, namely twice a year (June and December positions).*
4. *The report on the implementation of the Board of Commissioners' supervisory duties regarding the realization of the Bank's Work Plan is carried out twice a year (June and December positions) no later than 2 months after the reporting month.*
5. *The Board of Commissioners is also required to prepare and submit other reports to the relevant regulators as required by applicable provisions.*

In 2024, based on the results of the corporate governance self-assessment on the Aspect of Implementation of Duties and Responsibilities of the Board of Commissioners, a composite score of 1 or "Low" was obtained. The results of the assessment have been disclosed in the description of the Results of the Corporate Governance (GCG) Self-Assessment in this Annual Report.

Performance Assessment of Committees under the Board of Commissioners

The performance assessment of the Board of Commissioners' supporting organs is carried out as an evaluation process to determine the implementation of tasks and achievement of

masing organ pendukung. Penilaian kinerja organ pendukung Dewan Komisaris juga dilakukan melalui proses *self-assessment* Tata Kelola Perusahaan (GCG). Proses penilaian ini dilakukan secara periodik dengan memperhatikan sejumlah kriteria, antara lain:

1. Ketepatan laporan yang diberikan kepada Dewan Komisaris.
2. Tingkat kehadiran dan partisipasi masing-masing anggota komite dalam rapat.
3. Keaktifan anggota pada saat rapat.

Pada tahun 2024, hasil penilaian *self-assessment* untuk Aspek Kelengkapan dan Pelaksanaan Tugas Komite sebagai organ pendukung Dewan Komisaris meraih nilai komposit 2 atau "Low to Moderate". Walaupun masih terdapat kelemahan dalam penerapan prinsip Tata Kelola/*Good Corporate Governance*, namun demikian secara umum kelemahan tersebut kurang signifikan dan dapat diselesaikan dengan tindakan normal oleh Manajemen Bank. Hasil penilaian tersebut telah diungkapkan pada uraian Hasil *Self-Assessment* Tata Kelola Perusahaan (GCG) di dalam Laporan Tahunan ini.

Komisaris Independen

Komisaris Independen merupakan anggota Dewan Komisaris yang tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham dan/atau hubungan keluarga dengan anggota Dewan Komisaris, anggota Direksi dan/atau pemegang saham pengendali atau dengan Bank yang mungkin menghalangi atau menghambat posisinya untuk bertindak independen sesuai dengan prinsip-prinsip GCG. Komisaris

Independen diangkat oleh RUPS dengan memperhatikan bahwa anggota yang diangkat tidak memiliki hubungan afiliasi dengan pihak yang berkepentingan, terutama pemegang saham mayoritas, anggota Direksi, dan/atau anggota Dewan Komisaris.

Di tahun 2024, Bank Sahabat Sampoerna memiliki 2 (dua) orang Komisaris Independen atau 50% dari total anggota Dewan Komisaris secara keseluruhan. Jumlah ini telah memenuhi ketentuan yang diatur pada Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum.

Kriteria Komisaris Independen

Komisaris Independen Bank Sahabat Sampoerna wajib memenuhi kriteria sebagai berikut:

1. Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan Bank termasuk mantan anggota Direksi atau Pejabat Eksekutif Bank atau pihak-pihak yang mempunyai hubungan dengan

targets for each supporting organ. The performance assessment of the Board of Commissioners' supporting organs is also carried out through the Corporate Governance (GCG) self-assessment process. This assessment process is carried out periodically by considering a number of criteria, including:

1. Accuracy of reports provided to the Board of Commissioners.
2. The level of attendance and participation of each committee member in meetings.
3. Member activity during meetings.

In 2024, the results of the self-assessment for the Completeness and Implementation of Committee Duties Aspect as a supporting organ of the Board of Commissioners achieved a composite score of 2 or "Low to Moderate". Although there are still weaknesses in the implementation of Good Corporate Governance principles, however, in general these weaknesses are less significant and can be resolved with normal actions by the Bank's Management. The results of the assessment have been disclosed in the description of the Corporate Governance (GCG) Self-Assessment Results in this Annual Report.

Independent Commissioner

An Independent Commissioner is a member of the Board of Commissioners who does not have any financial, management, share ownership and/or family relationships with members of the Board of Commissioners, members of the Board of Directors and/or controlling shareholders or with the Bank that may hinder or hinder his position to act independently in accordance with the principles of GCG.

Independent Commissioners are appointed by the GMS by taking into account that the appointed members do not have any affiliated relationships with interested parties, especially majority shareholders, members of the Board of Directors, and/or members of the Board of Commissioners.

In 2024, Bank Sahabat Sampoerna has 2 (two) Independent Commissioners or 50% of the total members of the Board of Commissioners as a whole. This number has fulfilled the provisions stipulated in the Financial Services Authority Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks and the Financial Services Authority Circular Letter No. 13/SEOJK.03/2017 concerning the Implementation of Governance for Commercial Banks.

Independent Commissioner Criteria

Independent Commissioners of Bank Sahabat Sampoerna must meet the following criteria:

1. *They must not be individuals who work for or have the authority and responsibility to plan, lead, control, or supervise the Bank's activities. This includes former members of the Board of Directors or Executive Officers of the Bank or individuals with relationships that*

- Bank, yang dapat memengaruhi kemampuannya untuk bertindak independen dalam waktu 1 (satu tahun terakhir, kecuali untuk pengangkatan kembali sebagai Komisaris Independen Bank pada periode berikutnya;
2. Ketentuan sebagaimana dimaksud pada angka (1) di atas tidak berlaku bagi mantan Direksi atau Pejabat Eksekutif yang melakukan fungsi pengawasan;
 3. Tidak mempunyai saham baik langsung maupun tidak langsung pada bank;
 4. Tidak mempunyai hubungan afiliasi dengan Bank, anggota Dewan Komisaris, anggota Direksi, atau Pemegang Saham Utama Bank;
 5. Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank;
 6. Komisaris Independen yang menjabat sebagai Ketua Komite, hanya dapat merangkap jabatan sebagai Ketua Komite maksimum pada 1 (satu) Komite lain.
 7. Untuk Calon Komisaris Independen harus memiliki Pengetahuan di bidang perbankan yang memadai dan relevan dengan jabatan sebagai Komisaris Independen serta memiliki pengalaman di bidang perbankan dan/atau bidang keuangan

Pernyataan Independensi Komisaris Independen

Komisaris Independen Bank Sahabat Sampoerna berkomitmen mengedepankan sikap independensi dengan menjalankan tugas dan tanggung jawab secara profesional, objektif, penuh kehati-hatian, serta memenuhi aspek-aspek independensi yang telah ditentukan oleh regulator, sebagai berikut:

could affect their independence within the past year, except when being reappointed as an Independent Commissioner of the Bank.

2. *The restriction in point (1) does not apply to former Directors or Executive Officers who previously held supervisory roles.*
3. *They must not own shares in the Bank, either directly or indirectly.*
4. *They must not have any affiliation with the Bank, members of the Board of Commissioners, members of the Board of Directors, or the Bank's Major Shareholders.*
5. *They must not have any business relationships, either directly or indirectly, related to the Bank's business activities.*
6. *Independent Commissioners serving as Committee Chairpersons may only hold a concurrent position as a Committee Chairperson in a maximum of one other Committee.*
7. *Candidates for Independent Commissioner must possess adequate banking knowledge relevant to the role and have experience in banking and/or finance.*

Statement of Independence of Independent Commissioner

The Independent Commissioners of Bank Sahabat Sampoerna are committed to upholding independence by executing their duties and responsibilities in a professional, objective, and prudent manner. Furthermore, they adhere to the aspects of independence as stipulated by the regulatory authority.

Aspek Independensi <i>Aspect of Independence</i>	Khoe Minhari Handikusuma	Anggar Budhi Nuraini
Tidak bekerja atau memiliki wewenang untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan Bank selama 6 bulan sebelum pengangkatannya, kecuali dalam tugasnya sebagai Komisaris Independen yang diangkat kembali. <i>Not working or having the authority to plan, lead, control, or oversee the Bank's activities for 6 months prior to the appointment, except in the assignment as a reappointed Independent Commissioner.</i>	v	v
Tidak secara langsung atau tidak langsung memiliki saham di Bank. <i>Not holding shares in the Bank, directly or indirectly.</i>	v	v
Tidak memiliki hubungan afiliasi dengan Bank atau Pemegang Saham Utama dan Pengendali atau salah satu anggota Dewan Komisaris atau Direksi. <i>Not having an affiliation relationship with the Bank or Main and Controlling Shareholders or one of the members of the Board of Commissioners or the Board of Directors.</i>	v	v
Tidak memiliki hubungan kerja/profesional langsung atau tidak langsung dengan Bank. <i>Not having a direct or indirect employment/professional relationship with the Bank.</i>	v	v
Tidak mempunyai usaha, baik langsung maupun tidak langsung, yang berkaitan dengan kegiatan usaha Bank. <i>Not having a business, either directly or indirectly, that is related to the Bank's business activities.</i>	v	v

v : Terpenuhi / *Fulfilled*

x : Tidak Terpenuhi / *Not Fulfilled*

Pengunduran Diri

1. Anggota Dewan Komisaris berhak mengundurkan diri dari jabatannya dengan memberitahukan secara tertulis mengenai maksudnya tersebut kepada Bank selambatnya 30 (tiga puluh) hari sebelum efektif pengunduran dirinya.

Resignation

1. *Members of the Board of Commissioners have the right to resign from their positions by notifying the Bank in writing of their intention no later than 30 (thirty) days before the effective date of their resignation.*

2. Anggota Dewan Komisaris yang mengundurkan diri sebelum masa jabatannya berakhir maka pertanggungjawaban atas pelaksanaan tugas pengawasan yang dijalankan sejak pertanggungjawaban yang terakhir sampai dengan pemberhentian sementara tersebut efektif tetap harus dimintakan pada RUPS Tahunan yang terdekat.
 3. Anggota Dewan Komisaris yang terlibat dalam kejahatan keuangan dan/atau tindak pidana lainnya wajib mengundurkan diri.
 4. Anggota Dewan Komisaris dapat mengundurkan diri dari jabatannya sebelum masa jabatan berakhir melalui pemberitahuan tertulis kepada Bank.
 5. Dalam hal anggota Dewan Komisaris mengundurkan diri sehingga mengakibatkan jumlah anggota Dewan Komisaris menjadi kurang dari 3 (tiga) orang, pengunduran diri tersebut sah jika telah ditetapkan oleh RUPS dan telah diangkat anggota Dewan Komisaris yang baru.
 6. Otoritas Jasa Keuangan berwenang melakukan evaluasi terhadap pengunduran diri anggota Dewan Komisaris untuk menilai pengunduran diri dilakukan secara sukarela, terdapat unsur paksaan, atau kondisi lain.
 7. Dewan Komisaris Bank yang diberhentikan, mengundurkan diri, atau meninggal dunia, Bank wajib menginformasikan kepada OJK paling lama 10 (sepuluh) hari kerja sejak tanggal pemberhentian, pengunduran diri, atau dinyatakan meninggal dunia, disertai dengan dokumen pendukung pemberhentian, pengunduran diri, dan/atau yang menyatakan meninggal dunia.
 8. Dewan Komisaris yang telah disetujui OJK belum diangkat dalam jangka waktu sebagaimana dimaksud, persetujuan yang telah diterbitkan oleh OJK menjadi tidak berlaku.
 9. Bank wajib menginformasikan kepada OJK paling lama 10 (sepuluh) hari kerja setelah tanggal pengangkatan efektif, disertai dengan notulen RUPS atau dokumen pengangkatan dari pejabat yang berwenang pada bank yang berkedudukan di luar negeri.
2. *Members of the Board of Commissioners who resign before their term of office ends, accountability for the implementation of supervisory duties carried out since the last accountability until the temporary dismissal becomes effective must still be requested at the nearest Annual GMS.*
 3. *Members of the Board of Commissioners who are involved in financial crimes and/or other criminal acts are required to resign.*
 4. *Members of the Board of Commissioners may resign from their positions before the end of their term of office through written notification to the Bank.*
 5. *In the event that a member of the Board of Commissioners resigns resulting in the number of members of the Board of Commissioners becoming less than 3 (three) people, the resignation is valid if it has been determined by the GMS and a new member of the Board of Commissioners has been appointed.*
 6. *The Financial Services Authority has the authority to evaluate the resignation of members of the Board of Commissioners to assess whether the resignation was voluntary, there was an element of coercion, or other conditions.*
 7. *The Board of Commissioners of the Bank who are dismissed, resign, or die, the Bank is required to inform the OJK no later than 10 (ten) working days from the date of the letter of dismissal, resignation, or declared death, accompanied by supporting documents for the dismissal, resignation, and/or stating death.*
 8. *The Board of Commissioners who have been approved by the OJK have not been appointed within the period as referred to, the approval issued by the OJK becomes invalid.*
 9. *The Bank is required to inform the OJK no later than 10 (ten) working days after the effective date of appointment, accompanied by minutes of the GMS or appointment documents from authorized officials at banks domiciled abroad.*

Direksi

Board of Directors

Direksi adalah organ utama yang bertugas menjalankan tindakan pengurusan untuk mencapai visi dan misi demi kepentingan Bank. Direksi juga bertanggung jawab mewakili Bank, baik di dalam dan di luar pengadilan. Masing-masing anggota Direksi dapat melaksanakan tugas dan mengambil keputusan sesuai dengan pembagian tugas dan wewenangnya, namun pelaksanaan tugas oleh masing-masing anggota Direksi tetap merupakan tanggung jawab bersama. Dalam pelaksanaan tugas dan tanggung jawabnya tersebut, Direksi diawasi oleh Dewan Komisaris dan bertanggung jawab langsung kepada Pemegang Saham dalam pelaksanaan RUPS Tahunan.

Komposisi Direksi Tahun 2024

Per 31 Desember 2024, komposisi Direksi Bank Sahabat Sampoerna tidak mengalami perubahan, yakni berjumlah 5 (lima) orang. Jumlah tersebut telah memenuhi ketentuan dalam POJK No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum yang mewajibkan setiap bank memiliki minimal tiga anggota Direksi.

Adapun komposisi anggota Direksi Bank Sahabat Sampoerna sepanjang tahun 2024 dapat dilihat sebagai berikut:

The Board of Directors is the main organ tasked with carrying out management actions to achieve the vision and mission for the benefit of the Bank. The Board of Directors is also responsible for representing the Bank, both inside and outside the court. Each member of the Board of Directors can carry out duties and make decisions in accordance with the division of duties and authorities, but the implementation of duties by each member of the Board of Directors remains a shared responsibility. In carrying out its duties and responsibilities, the Board of Directors is supervised by the Board of Commissioners and is directly responsible to the Shareholders in the implementation of the Annual GMS.

Composition of the Board of Directors in 2024

As of December 31, 2024, the composition of the Board of Directors of Bank Sahabat Sampoerna has not changed, namely 5 (five) people. This number has met the provisions in POJK No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks which requires each bank to have a minimum of three members of the Board of Directors.

The composition of the members of the Board of Directors of Bank Sahabat Sampoerna throughout 2024 can be seen as follows:

Nama Name	Jabatan Position	Masa Jabatan dan Dasar Pengangkatan Term of Office and Basis of Appointment	Persetujuan Bank Indonesia/ Otoritas Jasa Keuangan Approval from Bank Indonesia/ Financial Services Authority	Akhir Periode Jabatan End of Term of Office
Ali Rukmijah	Direktur Utama President Director	<ul style="list-style-type: none"> 2023-2026: Keputusan di Luar RUPS Luar Biasa tanggal 26 Mei 2023; 2020-2023: Keputusan di Luar RUPS Luar Biasa tanggal 28 Mei 2020; 2017-2020: Keputusan di Luar RUPS Luar Biasa tanggal 22 Mei 2017; dan 2014-2017: Keputusan RUPS Luar Biasa tanggal 9 Juni 2014. 2023-2026 : Circular Resolutions of Extraordinary GMS dated May 26, 2023; 2020-2023 : Circular Resolutions of Extraordinary GMS dated May 28, 2020; 2017-2020 : Circular Resolutions of Extraordinary GMS dated May 22, 2017; and 2014-2017 : Extraordinary GMS Resolutions dated June 9, 2014. 	No. SR-67/D.03/2014 tanggal 19 Mei 2014 No. SR-67/D.03/2014 dated May 19, 2014	2023-2026
Henky Suryaputra	Direktur Keuangan & Perencanaan Bisnis Finance & Business Planning Director	<ul style="list-style-type: none"> 2023-2026: Keputusan di Luar RUPS Luar Biasa tanggal 26 Mei 2023; dan 2020-2023: Keputusan di Luar RUPS Luar Biasa tanggal 27 Juli 2020. 2023-2026 : Circular Resolutions of Extraordinary GMS dated May 26, 2023; and 2020-2023 : Circular Resolutions of Extraordinary GMS dated July 27, 2020. 	No. KEP-70/D.03/2020 tanggal 26 Juni 2020 No. KEP-70/D.03/2020 dated June 26, 2020	2023-2026

Nama <i>Name</i>	Jabatan <i>Position</i>	Masa Jabatan dan Dasar Pengangkatan <i>Term of Office and Basis of Appointment</i>	Persetujuan Bank Indonesia/ Otoritas Jasa Keuangan <i>Approval from Bank Indonesia/ Financial Services Authority</i>	Akhir Periode Jabatan <i>End of Term of Office</i>
Hendra Rahardja	Direktur Teknologi Informasi <i>Information Technology Director</i>	2023-2026 : Keputusan di Luar RUPS Luar Biasa tanggal 26 Mei 2023. <i>2023-2026 : Circular Resolutions of Extraordinary GMS dated May 26, 2023.</i>	No. KEPR-105/D.03/2023 tanggal 25 Agustus 2023 <i>No. KEPR-105/D.03/2023 dated August 25, 2023</i>	2023-2026
Rudy Mahasin	Direktur Bisnis UMKM <i>ESME Business Director</i>	<ul style="list-style-type: none"> • 2023-2026: Keputusan di Luar RUPS Luar Biasa tanggal 26 Mei 2023; • 2020-2023: Keputusan di Luar RUPS Luar Biasa tanggal 28 Mei 2020; • 2017-2020: Keputusan di Luar RUPS Luar Biasa tanggal 22 Mei 2017; dan • 2015-2017: Keputusan RUPS Luar Biasa tanggal 28 April 2015. • <i>2023-2026 : Circular Resolutions of Extraordinary GMS dated May 26, 2023;</i> • <i>2020-2023 : Circular Resolutions of Extraordinary GMS dated May 28, 2020;</i> • <i>2017-2020 : Circular Resolutions of Extraordinary GMS dated May 22, 2017; and</i> • <i>2015-2017 : Extraordinary GMS Resolutions dated April 28, 2015.</i> 	No. SR-21/D.03/2015 tanggal 20 Februari 2015 <i>No. SR-21/D.03/2015 dated February 20, 2015</i>	2023-2026
A. Dendi Hardiansyah	Direktur Kepatuhan & Manajemen Risiko <i>Compliance & Risk Director</i>	<ul style="list-style-type: none"> • 2023-2026: Keputusan di Luar RUPS Luar Biasa tanggal 26 Mei 2023; dan • 2022-2023: Keputusan RUPS Luar Biasa tanggal 9 Mei 2022. • <i>2023-2026 : Circular Resolutions of Extraordinary GMS dated May 26, 2023; and</i> • <i>2022-2023 : Extraordinary GMS Resolutions dated May 9, 2022.</i> 	No. KEP-19/PB.1/2022 tanggal 14 April 2022 <i>No. KEP-19/PB.1/2022 dated April 14, 2022</i>	2023-2026

Kriteria Anggota Direksi

Bank telah mengatur kriteria bagi anggota Direksi sesuai dengan ketentuan dan perundang-undangan yang berlaku. Seluruh anggota Direksi Bank wajib memenuhi sejumlah persyaratan, antara lain:

1. Persyaratan anggota Direksi:
 - a. Mempunyai akhlak, moral, dan integritas yang baik;
 - b. Cakap melakukan perbuatan hukum;
 - c. Dalam waktu 5 tahun sebelum pengangkatan sebagai Direktur, dan selama menjabat:
 - Tidak pernah dinyatakan pailit;
 - Tidak pernah menjadi anggota Direksi dan/atau anggota Dewan Komisaris yang dinyatakan bersalah menyebabkan suatu perusahaan dinyatakan pailit;
 - Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan;

Criteria for Board of Directors Members

The Bank has set criteria for Board of Directors members in accordance with applicable laws and regulations. All members of the Bank's Board of Directors are required to meet a number of requirements, including:

1. Requirements for members of the Board of Directors:
 - a. Have good morals, ethics, and integrity;
 - b. Capable of carrying out legal acts;
 - c. Within 5 years prior to appointment as Director, and during his/her term of office:
 - Never been declared bankrupt;
 - Never been a member of the Board of Directors and/or a member of the Board of Commissioners who was found guilty of causing a company to be declared bankrupt;
 - Never been convicted of committing a crime that is detrimental to state finances and/or related to the financial sector;

- Tidak pernah menjadi anggota Direksi dan/atau Dewan Komisaris yang selama menjabat:
 - › Pernah tidak menyelenggarakan RUPS Tahunan;
 - › Pertanggungjawabannya pernah tidak diterima oleh RUPS atau pernah tidak memberikan pertanggungjawaban sebagai anggota Direksi dan/atau Dewan Komisaris;
 - › Pernah menyebabkan perusahaan yang memperoleh izin, persetujuan, atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan Laporan Tahunan dan/atau Laporan Keuangan kepada Otoritas Jasa Keuangan;
 - › Memiliki komitmen untuk mematuhi peraturan perundang-undangan dan mendukung kebijakan OJK;
 - › Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan oleh Bank, meliputi:
 - » Pengetahuan di bidang perbankan: pemahaman peraturan dan operasional bank, manajemen risiko, pemasaran, akuntansi, audit, pendanaan, perkreditan, pasar uang, pasar modal, hukum atau pengalaman dan keahlian di bidang pengawasan lembaga jasa keuangan.
 - » Kemampuan untuk melakukan pengelolaan strategis antara lain memiliki kemampuan untuk mengantisipasi perkembangan perekonomian, keuangan dan perbankan menginterpretasikan visi dan misi Bank, serta analisis situasi industri perbankan.
 - » Memenuhi persyaratan mengenai kepemilikan dan pengurusan/pengelolaan Bank sebagaimana diatur dalam ketentuan peraturan perundang-undangan yang berlaku.
 - d. Memiliki komitmen terhadap pengembangan Lembaga Jasa Keuangan (LJK) yang sehat;
 - e. Tidak termasuk sebagai pihak yang dilarang untuk menjadi Pihak Utama;
 - f. Tidak memiliki kredit dan/atau pembiayaan macet; dan
 - g. Persyaratan kelayakan keuangan paling sedikit dibuktikan dengan:
 - memiliki reputasi keuangan;
 - memiliki kemampuan keuangan yang dapat mendukung perkembangan bisnis LJK; dan
 - memiliki komitmen untuk melakukan upaya-upaya yang diperlukan apabila LJK menghadapi kesulitan keuangan.
 - Tidak sedang menjalani konsekuensi hasil akhir dari penilaian kembali pihak Utama dengan predikat tidak lulus dan/atau tidak termasuk dalam daftar tidak lulus.
- *Never been a member of the Board of Directors and/or Board of Commissioners who during his/her term of office:*
 - › *Never held an Annual GMS;*
 - › *His/her accountability was never accepted by the GMS or he/she never provided accountability as a member of the Board of Directors and/or Board of Commissioners;*
 - › *Ever caused a company that obtained a permit, approval, or registration from the Financial Services Authority to fail to fulfill its obligation to submit an Annual Report and/or Financial Report to the Financial Services Authority;*
 - › *Has a commitment to comply with laws and regulations and support OJK policies;*
 - › *Have knowledge and/or expertise in the fields required by the Bank, including:*
 - » *Knowledge in banking: understanding bank regulations and operations, risk management, marketing, accounting, auditing, funding, credit, money markets, capital markets, law or experience and expertise in the field of supervision of financial services institutions.*
 - » *Ability to carry out strategic management including having the ability to anticipate economic, financial and banking developments, interpret the Bank's vision and mission, and analyze the banking industry situation.*
 - » *Meet the requirements regarding ownership and management/management of the Bank as stipulated in the provisions of applicable laws and regulations.*
 - d. *Have a commitment to the development of a healthy Financial Services Institution (LJK);*
 - e. *Not included as a party prohibited from becoming a Main Party;*
 - f. *Do not have bad credit and/or financing; and*
 - g. *Financial eligibility requirements are at least proven by:*
 - *having a financial reputation;*
 - *having financial capabilities that can support the development of the LJK business; and*
 - *having a commitment to make the necessary efforts if the LJK faces financial difficulties.*
 - *Not undergoing the consequences of the final result of the reassessment of the Main party with the predicate of not passing and/or not included in the list of not passing.*

- Tidak pernah dinyatakan pailit dan/atau tidak pernah menjadi anggota Direksi yang dinyatakan bersalah menyebabkan suatu perseroan dinyatakan pailit dalam waktu 5 (lima) tahun terakhir sebelum dicalonkan
2. Mayoritas anggota Direksi paling kurang memiliki pengalaman 5 (lima) tahun di bidang operasional sebagai pejabat eksekutif Bank.
 3. Mayoritas anggota Direksi dilarang memiliki hubungan keluarga sampai dengan derajat kedua dengan sesama anggota Direksi dan/atau anggota Dewan Komisaris maupun pemegang saham pengendali.
 4. Yang dimaksud dengan hubungan keluarga sampai derajat kedua adalah hubungan baik vertikal maupun horizontal meliputi:
 - a. Orang tua kandung/tiri/angkat
 - b. Saudara kandung/tiri/angkat beserta suami atau istri
 - c. Anak kandung/tiri/angkat
 - d. Kakek atau nenek kandung/tiri/angkat
 - e. Cucu kandung/tiri/angkat
 - f. Saudara kandung/tiri/angkat dari orang tua beserta suami atau istri
 - g. Suami atau istri
 - h. Mertua
 - i. Besan
 - j. Suami atau istri dari anak kandung/tiri/angkat
 - k. Kakek atau nenek dari suami atau istri
 - l. Suami atau istri dari cucu kandung/tiri/angkat
 - m. Saudara kandung/tiri/angkat dari suami atau istri beserta
 - n. Suami atau istri
 5. Seseorang yang telah memenuhi persyaratan untuk menjadi calon Direktur, diajukan kepada Bank untuk dilakukan proses seleksi (*assessment*) kemampuan, latar belakang, kelayakan, pendidikan, akhlak, moral, dan integritas calon oleh Komite Remunerasi dan Nominasi (KRN).
 6. Bagi calon yang telah memenuhi kualifikasi, KRN wajib memberikan rekomendasi kepada Dewan Komisaris untuk diputuskan dan diajukan kepada pemegang saham melalui RUPS dan kepada OJK untuk mengikuti proses Penilaian Kemampuan dan Kepatutan. KRN juga harus membuat analisa hasil penilaian (*assessment*) calon anggota Direksi untuk digunakan sebagai salah satu persyaratan pengajuan calon Direktur kepada OJK.
 7. Dalam hal anggota KRN memiliki benturan kepentingan (*conflict of interest*) dengan calon Direktur, maka wajib diungkapkan dalam usulan tersebut.
 8. Pengangkatan anggota Direksi harus mendapat persetujuan RUPS dan telah lulus Penilaian Kemampuan dan Kepatutan (*Fit and Proper Test*) dari OJK, dan/atau memenuhi persyaratan lain yang ditetapkan oleh instansi lain yang terkait sebelum dinyatakan efektif menjabat sebagai Direktur.
- *Has never been declared bankrupt and/or has never been a member of the Board of Directors who was found guilty of causing a company to be declared bankrupt within the last 5 (five) years before nomination.*
 2. *The majority of members of the Board of Directors must have at least 5 (five) years of experience in the operational field as executive officers of the Bank.*
 3. *The majority of members of the Board of Directors are prohibited from having family relationships up to the second degree with fellow members of the Board of Directors and/or members of the Board of Commissioners or controlling shareholders.*
 4. *Family relationships up to the second degree are relationships that are either vertical or horizontal including:*
 - a. *Biological/step/adoptive parents*
 - b. *Biological/step/adoptive siblings and their husbands or wives*
 - c. *Biological/step/adoptive children*
 - d. *Biological/step/adoptive grandfathers or grandmothers*
 - e. *Biological/step/adoptive grandchildren*
 - f. *Biological/step/adoptive siblings of parents and their husbands or wives*
 - g. *Husband or wife*
 - h. *In-laws*
 - i. *In-laws*
 - j. *Husband or wife of biological/step/adoptive children*
 - k. *Grandfather or grandmother of husband or wife*
 - l. *Husband or wife of biological/step/adoptive grandchildren*
 - m. *Biological/step/adoptive siblings of husband or wife and*
 - n. *Husband or wife*
 5. *A person who has met the requirements to become a candidate for Director, is submitted to the Bank for a selection process (assessment) of the candidate's ability, background, eligibility, education, morals, ethics, and integrity by the Remuneration and Nomination Committee (KRN).*
 6. *For candidates who have met the qualifications, KRN is required to provide recommendations to the Board of Commissioners to be decided and submitted to shareholders through the GMS and to the OJK to follow the Fit and Proper Test process. KRN must also analyze the results of the assessment of prospective members of the Board of Directors to be used as one of the requirements for submitting a candidate for Director to the OJK.*
 7. *In the event that a member of the KRN has a conflict of interest with a candidate for Director, this must be disclosed in the proposal.*
 8. *The appointment of members of the Board of Directors must be approved by the GMS and have passed the Fit and Proper Test from the OJK, and/or meet other requirements set by other related agencies before being declared effective as Director.*

9. Calon Direktur yang belum dinyatakan efektif atau belum memperoleh persetujuan OJK, tidak dapat melakukan tugas dan tanggung jawabnya sebagai Direktur serta tidak dapat membuat keputusan yang mengikat secara hukum, dan oleh karenanya belum melekat hak dan kewajibannya sebagai Direktur walaupun telah mendapat persetujuan dan diangkat oleh RUPS.
 10. Calon Direktur yang telah dinyatakan efektif wajib dilaporkan kepada OJK paling lambat 10 (sepuluh) hari kerja setelah tanggal pengangkatan efektif, disertai dengan akta RUPS, dan yang bersangkutan wajib membuat dan menyampaikan Surat Pernyataan Direksi kepada Lembaga Penjamin Simpanan sesuai ketentuan yang berlaku.
 11. Anggota Direksi yang telah memenuhi persyaratan persetujuan Otoritas Jasa Keuangan selama menjabat wajib memiliki:
 - a. integritas;
 - b. kompetensi; dan
 - c. reputasi yang baik.
 12. Anggota Direksi harus bersedia meningkatkan kompetensi secara terus menerus melalui pendidikan dan pelatihan.
 13. Pengangkatan anggota Direksi yang berasal dari pegawai atau pejabat pada lembaga yang melakukan fungsi pengaturan dan/atau pengawasan Bank dan/atau lembaga jasa keuangan lain dilakukan setelah yang bersangkutan telah berhenti secara efektif sebagai pegawai atau pejabat dan menjalani masa tunggu paling singkat 6 (enam) bulan.
 14. Persyaratan kompetensi, paling sedikit meliputi pengetahuan dan/atau pengalaman yang mendukung pengelolaan LJK.
 15. Anggota Direksi dilarang menjadi anggota komite audit, komite pemantau risiko, atau komite remunerasi dan nominasi.
 16. Tentang Penilaian Kemampuan dan Kepatutan Calon Anggota Direksi:
 - a. Calon anggota Direksi meliputi:
 - Orang yang belum pernah menjadi anggota Direksi Bank yang dicalonkan menjadi anggota Direksi Bank;
 - Orang yang sedang menjabat sebagai anggota Direksi Bank, yang dicalonkan menjadi anggota Direksi pada Bank lainnya;
 - Orang yang pernah menjabat sebagai anggota Direksi Bank, yang dicalonkan menjadi anggota Direksi atau anggota Dewan Komisaris pada Bank yang sama atau pada Bank lainnya;
 - Anggota Dewan Komisaris Bank yang dicalonkan menjadi anggota Direksi pada Bank yang sama;
 - Anggota Direksi Bank yang dicalonkan menjadi
9. *Director candidates who have not been declared effective or have not obtained OJK approval, cannot perform their duties and responsibilities as Directors and cannot make legally binding decisions, and therefore their rights and obligations as Directors have not been attached even though they have received approval and been appointed by the GMS.*
 10. *Director candidates who have been declared effective must be reported to the OJK no later than 10 (ten) working days after the effective appointment date, accompanied by a GMS deed, and the person concerned must prepare and submit a Directors' Statement Letter to the Deposit Insurance Corporation in accordance with applicable provisions.*
 11. *Members of the Board of Directors who have met the requirements for approval from the Financial Services Authority during their term of office must have:*
 - a. *integrity;*
 - b. *competence; and*
 - c. *good reputation.*
 12. *Members of the Board of Directors must be willing to continuously improve their competence through education and training.*
 13. *The appointment of members of the Board of Directors who are employees or officials at institutions that carry out regulatory and/or supervisory functions for Banks and/or other financial services institutions is carried out after the person concerned has effectively resigned as an employee or official and has undergone a waiting period of at least 6 (six) months.*
 14. *Competency requirements, at least include knowledge and/or experience that supports the management of LJK.*
 15. *Members of the Board of Directors are prohibited from becoming members of the audit committee, risk monitoring committee, or remuneration and nomination committee.*
 16. *Regarding the Fit and Proper Assessment of Prospective Members of the Board of Directors:*
 - a. *Prospective members of the Board of Directors include:*
 - *Persons who have never been members of the Board of Directors of the Bank who are nominated as members of the Board of Directors of the Bank;*
 - *Persons who are currently serving as members of the Board of Directors of the Bank, who are nominated as members of the Board of Directors of another Bank;*
 - *Persons who have served as members of the Board of Directors of the Bank, who are nominated as members of the Board of Directors or members of the Board of Commissioners of the same Bank or another Bank;*
 - *Members of the Board of Commissioners of the Bank who are nominated as members of the Board of Directors of the same Bank;*
 - *Members of the Board of Directors of the Bank*

- Direktur yang membawahkan Fungsi Kepatuhan pada Bank yang sama;
- Anggota Direksi yang dicalonkan ke jabatan yang lebih tinggi pada Bank yang sama, yaitu anggota Direksi yang akan diangkat menjadi direktur utama/wakil direktur utama atau yang setara dengan itu pada Bank yang sama;
 - orang yang dicalonkan menjadi anggota Direksi pada Bank hasil penggabungan yang berasal dari Bank yang menggabungkan (merger);
 - orang yang dicalonkan menjadi anggota Direksi pada Bank hasil penggabungan yang berasal dari Bank yang menerima penggabungan (*surviving bank*) termasuk perpanjangan jabatan;
 - orang yang dicalonkan menjadi anggota Direksi Bank hasil peleburan yang berasal dari Bank yang melakukan peleburan.
- b. Perpanjangan jabatan anggota Direksi dilaporkan kepada OJK disertai dengan keputusan RUPS yang menetapkan perpanjangan jabatan dimaksud
- c. Bank terlebih dahulu menyusun daftar pemenuhan syarat (*compliance checklist*) dokumen persyaratan administratif kepada OJK yang dilakukan oleh Satuan Kerja Kepatuhan. Kemudian Bank melakukan permohonan perolehan persetujuan atas calon anggota Direksi melalui anggota Direksi Bank, dengan melengkapi dokumen persyaratan administratif yang telah ditentukan.
- Surat permohonan dan dokumen disampaikan kepada Departemen Perizinan dan Informasi Perbankan, Otoritas Jasa Keuangan dengan tembusan kepada Departemen Pengawasan Bank atau Kantor Regional Otoritas Jasa Keuangan di Jakarta.
- d. Jumlah calon anggota Direksi yang dapat diajukan dalam permohonan paling banyak berjumlah 2 (dua) orang untuk setiap lowongan jabatan dan penetapan calon yang diajukan telah sesuai dengan ketentuan perundang-undangan yang berlaku.
- e. OJK dapat menghentikan penilaian kemampuan dan kepatutan calon anggota Direksi apabila pada saat penilaian dilakukan calon tersebut:
- Sedang menjalani proses hukum
 - Sedang menjalani proses penilaian kemampuan dan kepatutan pada suatu LJK sedang dalam proses penilaian kembali karena terdapat indikasi permasalahan integritas, kelayakan/reputasi keuangan dan/atau kompetensi pada suatu LJK.
 - Sedang dalam proses penilaian kembali karena terdapat indikasi permasalahan integritas, kelayakan/reputasi keuangan dan/atau kompetensi pada suatu LJK.
- f. Calon anggota Direksi yang dihentikan penilaian kemampuan dan kepatutan, dapat diajukan kembali
- who are nominated as Directors in charge of the Compliance Function at the same Bank;*
- *Members of the Board of Directors who are nominated to higher positions at the same Bank, namely members of the Board of Directors who will be appointed as president director/deputy president director or equivalent at the same Bank;*
 - *person nominated as a member of the Board of Directors at the merged Bank originating from the Bank that merged (merged);*
 - *person nominated as a member of the Board of Directors at the merged Bank originating from the Bank that received the merger (surviving bank) including extension of office;*
 - *person nominated as a member of the Board of Directors of the merged Bank originating from the Bank that conducted the merger.*
- b. *Extension of office of the Board of Directors member is reported to the OJK accompanied by the decision of the GMS that determines the extension of office in question*
- c. *The Bank first prepares a compliance checklist of administrative requirement documents to the OJK which is carried out by the Compliance Work Unit. Then the Bank submits an application for approval of the candidate for the Board of Directors member through the Bank's Board of Directors member, by completing the specified administrative requirement documents.*
- *The application letter and documents are submitted to the Department of Banking Licensing and Information, Financial Services Authority with a copy to the Bank Supervision Department or the Financial Services Authority Regional Office in Jakarta.*
- d. *The number of candidates for members of the Board of Directors that can be submitted in an application is a maximum of 2 (two) people for each vacancy and the determination of the candidates submitted is in accordance with the provisions of applicable laws and regulations.*
- e. *OJK may stop the assessment of the capability and propriety of a candidate for member of the Board of Directors if at the time the assessment is carried out the candidate:*
- *Is undergoing a legal process*
 - *Is undergoing a process of assessing the capability and propriety of a LJK is in the process of being re-assessed because there are indications of problems with integrity, financial feasibility/reputation and/or competence at a LJK.*
 - *Is in the process of being re-assessed because there are indications of problems with integrity, financial feasibility/reputation and/or competence at a LJK.*
- f. *A candidate for member of the Board of Directors whose capability and propriety assessment has*

- kepada OJK untuk menjadi calon anggota Direksi apabila yang bersangkutan telah selesai menjalani proses hukum yang dibuktikan dengan adanya:
- Surat Perintah Penghentian Penyidikan (SP3)
 - Putusan Pengadilan yang telah memperoleh kekuatan hukum tetap yang menyatakan bahwa yang bersangkutan tidak bersalah
 - Putusan Pengadilan yang telah memperoleh kekuatan hukum tetap yang menyatakan bahwa yang bersangkutan tidak ditetapkan pailit
 - Tidak terbukti memiliki permasalahan integritas, kelayakan/reputasi keuangan, dan/atau kompetensi.
- g. Calon anggota Direksi yang ditetapkan Tidak Disetujui dapat dicalonkan kembali kepada OJK paling cepat 6 (enam) bulan sejak tanggal penetapan Tidak Disetujui dari OJK.
- h. Calon anggota Direksi atau calon anggota Dewan Komisaris yang Tidak Disetujui karena persyaratan kompetensi dapat dicalonkan kembali sebelum 6 (enam) bulan apabila dicalonkan kembali pada:
- Bidang jabatan yang berbeda pada jabatan yang setingkat atau jabatan yang lebih rendah pada Bank yang sama
 - Jabatan di Bank lain yang mempunyai ukuran dan kompleksitas yang lebih rendah
 - Jabatan di LJK selain Bank.
17. Anggota Direksi merupakan orang perseorangan yang memenuhi persyaratan persetujuan Otoritas Jasa Keuangan.
18. Setiap usulan penggantian dan/atau pengangkatan anggota Direksi kepada RUPS wajib memperhatikan rekomendasi komite yang menjalankan fungsi nominasi.
19. Penggantian dan/atau pengangkatan anggota Direksi mengedepankan komposisi secara profesional, independensi, kesesuaian kompetensi, dan memperhatikan keberagaman, yang dibutuhkan secara tepat dalam pelaksanaan tugas dan tanggung jawab Direksi.
20. Bank menetapkan dalam anggaran dasar mengenai kriteria, mekanisme dan tata cara pengangkatan, penggantian, pemberhentian, dan/atau pengunduran diri anggota Direksi, termasuk kewenangan yang melekat kepada Direksi, sesuai dengan ketentuan peraturan perundang-undangan.
21. Untuk memastikan kepatuhan Bank pada ketentuan Otoritas Jasa Keuangan dan Bank wajib memiliki direktur yang membawahkan fungsi kepatuhan dan membentuk satuan kerja kepatuhan
22. Pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan sebelum periode masa jabatan berakhir wajib
- been terminated can be re-submitted to OJK to become a candidate for member of the Board of Directors if the person concerned has completed the legal process as evidenced by:*
- *Letter of Order to Terminate Investigation (SP3)*
 - *Court Decision that has obtained permanent legal force stating that the person concerned is not guilty*
 - *Court Decision that has obtained permanent legal force stating that the person concerned is not declared bankrupt*
 - *Not proven to have integrity, financial feasibility/reputation, and/or competency issues.*
- g. *Prospective members of the Board of Directors who are determined to be Not Approved can be re-nominated to the OJK no sooner than 6 (six) months from the date of the determination of Not Approved from the OJK.*
- h. *Prospective members of the Board of Directors or prospective members of the Board of Commissioners who are Not Approved due to competency requirements can be re-nominated before 6 (six) months if they are re-nominated in:*
- *Different field of office at the same level or lower position at the same Bank*
 - *Position at another Bank that has a lower size and complexity*
 - *Position at LJK other than Bank.*
17. *Members of the Board of Directors are individuals who meet the requirements for approval from the Financial Services Authority.*
18. *Every proposal for replacement and/or appointment of members of the Board of Directors to the GMS must take into account the recommendations of the committee that carries out the nomination function.*
19. *Replacement and/or appointment of members of the Board of Directors prioritizes professional composition, independence, suitability of competence, and attention to diversity, which is needed appropriately in carrying out the duties and responsibilities of the Board of Directors.*
20. *The Bank stipulates in the articles of association regarding the criteria, mechanisms and procedures for the appointment, replacement, dismissal, and/or resignation of members of the Board of Directors, including the authority inherent in the Board of Directors, in accordance with the provisions of laws and regulations.*
21. *To ensure the Bank's compliance with the provisions of the Financial Services Authority and the Bank is required to have a director who is in charge of the compliance function and form a compliance work unit*
22. *Dismissal or replacement of the president director and/or director in charge of the compliance function before the end of the term of office must first obtain approval*

- mendapatkan persetujuan terlebih dahulu dari Otoritas Jasa Keuangan sebelum diputuskan dalam RUPS.
23. Dalam memberikan persetujuan, Otoritas Jasa Keuangan melakukan penilaian terhadap kelayakan rencana pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan.
24. Bank menyampaikan permohonan kepada Otoritas Jasa Keuangan dengan memuat informasi mengenai:
- Alasan atau pertimbangan dilakukannya pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan
 - Bank juga dapat menyertakan profil calon pengganti yang dinilai memenuhi persyaratan untuk dilakukan penilaian kemampuan dan kepatutan.
- a. Penyampaian permohonan kepada Otoritas Jasa Keuangan disampaikan oleh Bank paling lama 1 (satu) bulan sebelum rencana pelaksanaan RUPS yang memuat agenda pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan.
- b. Jika Otoritas Jasa Keuangan menilai rencana pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan tidak layak, maka:
- Rencana pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan dimaksud tidak disetujui Otoritas Jasa Keuangan
 - Bank dilarang memuat agenda pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan dalam RUPS.
- c. Ketentuan pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan sebelum periode masa jabatan berakhir dan ketentuan penerapan sanksi terkait pemberhentian atau penggantian direktur utama dan/atau direktur yang membawahkan fungsi kepatuhan sebelum periode masa jabatan berakhir berlaku secara mutatis mutandis bagi Komisaris Independen.
25. Kepemilikan saham anggota Direksi secara sendiri sendiri atau bersama-sama sehubungan penerimaan bonus dan/atau tantiem dalam bentuk saham yang mengakibatkan kepemilikan saham sebesar 25% (dua puluh lima persen) atau lebih dapat dikecualikan.
26. Kepemilikan saham direktur utama atau direktur yang membawahkan fungsi kepatuhan yang berasal dari pemberian bonus, tantiem, program kepemilikan saham bagi manajemen, dan/atau program kepemilikan saham bagi karyawan pada perusahaan yang merupakan pemegang saham pengendali dan/atau pengendali terakhir Bank, tidak diperhitungkan dalam penilaian independensi terhadap pemegang saham pengendali, sepanjang:
- from the Financial Services Authority before being decided in the GMS.*
23. *In granting approval, the Financial Services Authority shall assess the feasibility of the plan to dismiss or replace the president director and/or director in charge of the compliance function.*
24. *The Bank shall submit an application to the Financial Services Authority containing information regarding:*
- *Reasons or considerations for dismissing or replacing the president director and/or director in charge of the compliance function*
 - *The Bank may also include a profile of a replacement candidate who is deemed to meet the requirements for a fit and proper assessment.*
- a. *The application to the Financial Services Authority shall be submitted by the Bank no later than 1 (one) month before the planned implementation of the GMS containing the agenda for dismissing or replacing the president director and/or director in charge of the compliance function.*
- b. *If the Financial Services Authority considers the plan to dismiss or replace the president director and/or director in charge of the compliance function to be unfeasible, then:*
- *The plan to dismiss or replace the president director and/or director in charge of the compliance function is not approved by the Financial Services Authority*
 - *The Bank is prohibited from including the agenda for dismissing or replacing the president director and/or director in charge of the compliance function in the GMS.*
- c. *The provisions for the dismissal or replacement of the main director and/or director in charge of the compliance function before the end of the term of office and the provisions for imposing sanctions related to the dismissal or replacement of the main director and/or director in charge of the compliance function before the end of the term of office apply mutatis mutandis to Independent Commissioners.*
25. *Ownership of shares by members of the Board of Directors individually or jointly in connection with the receipt of bonuses and/or bonuses in the form of shares resulting in share ownership of 25% (twenty five percent) or more may be excluded.*
26. *Share ownership of the president director or director in charge of the compliance function originating from the provision of bonuses, tantiems, management share ownership programs, and/or employee share ownership programs in companies that are the controlling and/or ultimate controlling shareholders of the Bank, is not taken into account in the assessment of independence of the controlling shareholders, as long as:*

- a. Kepemilikan saham merupakan kebijakan dari pemegang saham pengendali dan/atau pengendali terakhir Bank dan bukan merupakan inisiatif dari direktur utama atau direktur yang membawahkan fungsi kepatuhan
 - b. Kepemilikan saham tidak untuk diperdagangkan
 - c. Yang bersangkutan menyampaikan surat pernyataan bahwa senantiasa bertindak independen selama menjadi direktur utama atau direktur yang membawahkan fungsi kepatuhan walaupun memiliki saham pemegang saham pengendali dan/atau pengendali terakhir Bank
27. Kepemilikan saham yang berasal dari pemberian bonus, tantiem, program kepemilikan saham bagi manajemen/*management share ownership program*, dan/atau program kepemilikan saham bagi karyawan/*employee share ownership program* dibuktikan dengan keputusan RUPS dan/atau dokumen lain yang menetapkan hal tersebut.
28. Anggota Direksi dilarang meminta, menerima, mengizinkan, dan/atau menyetujui untuk menerima imbalan, komisi, uang tambahan, pelayanan, uang, barang berharga, dan/atau segala sesuatu yang mempunyai nilai ekonomis atau manfaat lain, untuk keuntungan pribadi, keluarga, dan pihak lain, dalam pelaksanaan kegiatan usaha Bank dan kegiatan lain terkait dengan Bank.
29. Anggota Direksi wajib menolak dan/atau dilarang menerima suatu perintah atau permintaan dari pemegang saham Bank, pihak terafiliasi, dan/atau pihak lain untuk:
- a. Melakukan tindakan yang terkait kegiatan usaha Bank dan/atau kegiatan lain yang tidak sesuai dengan penerapan Tata Kelola yang Baik pada Bank;
 - b. Melakukan tindak pidana dan/atau hal yang terindikasi tindak pidana
 - c. Melakukan tindakan dan hal yang dapat merugikan, berpotensi merugikan, dan/atau mengurangi keuntungan Bank.
- a. *Share ownership is the policy of the controlling and/or ultimate controlling shareholders of the Bank and is not an initiative of the president director or director in charge of the compliance function*
 - b. *Share ownership is not for trading*
 - c. *The person concerned submits a statement that he/she always acts independently while serving as the president director or director in charge of the compliance function even though he/she owns shares of the controlling and/or ultimate controlling shareholders of the Bank*
27. *Share ownership originating from the granting of bonuses, tantiem, management share ownership program, and/or employee share ownership program is evidenced by the GMS resolution and/or other documents stipulating such matters.*
28. *Members of the Board of Directors are prohibited from requesting, accepting, allowing, and/or agreeing to receive compensation, commission, additional money, services, money, valuables, and/or anything that has economic value or other benefits, for personal, family, and other party benefits, in the implementation of the Bank's business activities and other activities related to the Bank.*
29. *Members of the Board of Directors are required to reject and/or are prohibited from accepting an order or request from the Bank's shareholders, affiliated parties, and/or other parties to:*
- a. *Take actions related to the Bank's business activities and/or other activities that are not in accordance with the implementation of Good Governance at the Bank;*
 - b. *Commit criminal acts and/or things that are indicated as criminal acts*
 - c. *Take actions and things that can harm, have the potential to harm, and/or reduce the Bank's profits.*

Pedoman dan Tata Tertib Direksi

Dalam menjalankan tugas dan tanggung jawabnya, Direksi senantiasa mengacu pada Pedoman dan Tata Tertib Kerja Direksi No. BSS/KK-DIR/CSC/01/2024. Pedoman dan Tata Tertib Kerja tersebut membahas mengenai pokok-pokok fungsi Direksi, yaitu:

1. Struktur dan Keanggotaan;
2. Persyaratan dan Pengangkatan;
3. Tugas dan Tanggung Jawab;
4. Benturan Kepentingan;
5. Transparansi;
6. Etika Kerja;
7. Waktu Kerja;
8. Rapat;
9. Masa Jabatan;
10. Pengunduran Diri; serta
11. Penilaian dan Pertanggungjawaban Kinerja.

Board Manual of the Board of Directors

Board Manual The Board of Directors carries out its duties and responsibilities based on the Board Manual of the Board of Directors No. BSS/KK-DIR/CSC/01/2024. The Board Manual discusses the main functions of the Board of Directors, including:

1. *Structure and Composition;*
2. *Requirements and Appointments;*
3. *Duties and Responsibilities;*
4. *Conflict of Interest;*
5. *Transparency;*
6. *Work Ethics;*
7. *Working Hours;*
8. *Meetings;*
9. *Term of Office;*
10. *Resignation; and*
11. *Performance Assessment and Accountability.*

Independensi Direksi

Seluruh anggota Direksi Bank Sahabat Sampoerna senantiasa menjalankan tugas dan tanggung jawab pengelolaan perusahaan dengan mengedepankan sikap independen. Komitmen tersebut dibuktikan dengan menjalankan tugas dan tanggung jawab secara profesional, objektif, serta penuh kehati-hatian. Selain itu, Bank memastikan tidak adanya benturan kepentingan dan intervensi dari para Pemegang Saham, sehingga pelaksanaan tugas Direksi dapat dijalankan dengan maksimal dan efektif.

Tugas, Tanggung Jawab, dan Wewenang Direksi

Dalam melaksanakan fungsi pengelolaan Bank, Direksi memiliki tugas dan tanggung jawab sebagai berikut:

1. Direksi bertugas menjalankan dan bertanggung jawab atas pengurusan Bank untuk kepentingan Bank sesuai dengan maksud dan tujuan Bank yang ditetapkan dalam ketentuan peraturan perundang-undangan, anggaran dasar, dan keputusan RUPS
2. Direksi wajib melaksanakan tugas, wewenang, dan tanggung jawab dengan itikad baik dan dengan prinsip kehati-hatian
3. Direksi berwenang mewakili Bank sesuai dengan ketentuan peraturan perundang-undangan, anggaran dasar, dan keputusan RUPS.
4. Direksi menerapkan Tata Kelola yang Baik pada Bank, manajemen risiko, dan kepatuhan secara terintegrasi yang disesuaikan dengan perkembangan ekosistem perbankan terkini serta didukung dengan digitalisasi dan inovasi teknologi.
5. Dalam menerapkan Tata Kelola yang Baik pada Bank, Direksi paling sedikit wajib membentuk, antara lain:
 - a. Satuan kerja audit intern
 - b. Satuan kerja manajemen risiko
 - c. Satuan Kerja Kepatuhan
6. Selain membentuk satuan kerja sebagaimana ayat (5), Direksi membentuk satuan kerja lain yang diwajibkan sesuai dengan Peraturan Otoritas Jasa Keuangan.
7. Direksi wajib menindaklanjuti temuan audit atau pemeriksaan dan rekomendasi dari satuan kerja audit intern Bank, auditor ekstern, hasil pengawasan Otoritas Jasa Keuangan, dan/atau hasil pengawasan otoritas dan lembaga lain.
8. Direksi wajib mengungkapkan kepada pegawai mengenai kebijakan internal Bank yang bersifat strategis di bidang kepegawaian.
9. Direksi wajib mempertanggungjawabkan pelaksanaan tugas kepada pemegang saham melalui RUPS

Independence of the Board of Directors

All members of the Board of Directors of Bank Sahabat Sampoerna always carry out their duties and responsibilities in managing the company by prioritizing an independent attitude. This commitment is proven by carrying out their duties and responsibilities professionally, objectively, and with great care. In addition, the Bank ensures that there is no conflict of interest and intervention from Shareholders, so that the implementation of the Board of Directors' duties can be carried out optimally and effectively.

Duties, Responsibilities, and Authorities of the Board of Directors

In carrying out the Bank's management function, the Board of Directors has the following duties and responsibilities:

1. The Board of Directors is tasked with carrying out and being responsible for managing the Bank for the interests of the Bank in accordance with the Bank's intent and objectives as stipulated in the provisions of laws and regulations, articles of association, and decisions of the GMS
2. The Board of Directors is required to carry out its duties, authorities, and responsibilities in good faith and with the principle of prudence
3. The Board of Directors is authorized to represent the Bank in accordance with the provisions of laws and regulations, articles of association, and decisions of the GMS.
4. The Board of Directors implements Good Governance at the Bank, risk management, and compliance in an integrated manner that is adjusted to the latest developments in the banking ecosystem and supported by digitalization and technological innovation.
5. In implementing Good Governance at the Bank, the Board of Directors is required to form at least, among others:
 - a. Internal audit work unit
 - b. Risk management work unit
 - c. Compliance Work Unit
6. In addition to forming work units as referred to in paragraph (5), the Board of Directors forms other work units that are required in accordance with the Financial Services Authority Regulations.
7. The Board of Directors is required to follow up on audit findings or examinations and recommendations from the Bank's internal audit work unit, external auditors, the results of supervision by the Financial Services Authority, and/or the results of supervision by other authorities and institutions.
8. The Board of Directors is required to disclose to employees regarding the Bank's internal policies that are strategic in the field of personnel.
9. The Board of Directors is required to be accountable for the implementation of its duties to shareholders through the GMS

10. Direksi dilarang menggunakan penasihat perorangan dan/atau jasa profesional sebagai tenaga ahli atau konsultan, kecuali :
 - a. untuk proyek bersifat khusus;
 - b. berdasarkan pada kontrak kerja yang jelas;
 - c. dilaksanakan oleh Pihak Independen yang memiliki pengetahuan teknis tertentu dengan standar kualifikasi keahlian yang memadai untuk mengerjakan proyek yang bersifat khusus sebagaimana dimaksud dalam huruf a;
 - d. dilaksanakan oleh pihak yang tidak menduduki jabatan struktural pada Bank; dan
 - e. dilaksanakan oleh pihak yang tidak mempunyai wewenang untuk membuat keputusan operasional Bank.
 11. Dalam pengelolaan data dan informasi terkait Bank, Direksi wajib:
 - a. memiliki dan menyediakan data dan informasi yang akurat, relevan, dan tepat waktu, termasuk kepada Dewan Komisaris; dan
 - b. melaksanakan pengelolaan data dan informasi sesuai dengan Tata Kelola yang Baik pada Bank dan ketentuan peraturan perundang-undangan
 12. Direksi wajib memiliki pedoman dan tata tertib kerja yang bersifat mengikat bagi setiap anggota Direksi, yang mencantumkan:
 - a. pengorganisasian Bank dan pembagian tugas Direksi;
 - b. tugas, tanggung jawab, dan wewenang Direksi;
 - c. pengaturan kewenangan dan prosedur keputusan Direksi;
 - d. pengaturan etika kerja Direksi;
 - e. pengaturan rapat Direksi;
 - f. larangan terhadap Direksi;
 - g. evaluasi kinerja Direksi; dan
 - h. pola hubungan kerja Direksi dan Dewan Komisaris.
 13. Keputusan Direksi yang diambil sesuai dengan pedoman dan tata tertib kerja mengikat dan menjadi tanggung jawab seluruh anggota Direksi.
 14. Direksi wajib menumbuhkan dan mewujudkan terlaksananya Budaya Kepatuhan pada semua tingkatan organisasi dan kegiatan usaha Bank, serta wajib memastikan terlaksananya Fungsi Kepatuhan Bank.
 15. Terkait Anti Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (APU, PPT dan PPPSPM), pengawasan aktif Direksi paling kurang meliputi:
 - a. Mengusulkan kebijakan dan prosedur tertulis mengenai penerapan program APU, PPT dan PPPSPM kepada Dewan Komisaris;
10. *The Board of Directors is prohibited from using individual advisors and/or professional services as experts or consultants, except:*
 - a. *for special projects;*
 - b. *based on a clear work contract;*
 - c. *carried out by an Independent Party who has certain technical knowledge with adequate skill qualification standards to work on special projects as referred to in letter a;*
 - d. *carried out by a party who does not hold a structural position at the Bank; and*
 - e. *carried out by a party who does not have the authority to make operational decisions for the Bank.*
 11. *In managing data and information related to the Bank, the Board of Directors is required to:*
 - a. *possess and provide accurate, relevant, and timely data and information, including to the Board of Commissioners; and*
 - b. *implement data and information management in accordance with Good Governance at the Bank and provisions of laws and regulations*
 12. *The Board of Directors must have guidelines and work procedures that are binding for each member of the Board of Directors, which include:*
 - a. *organization of the Bank and division of duties of the Board of Directors;*
 - b. *duties, responsibilities, and authorities of the Board of Directors;*
 - c. *regulation of authority and procedures for decisions of the Board of Directors;*
 - d. *regulation of work ethics of the Board of Directors;*
 - e. *regulation of meetings of the Board of Directors;*
 - f. *prohibitions against the Board of Directors;*
 - g. *evaluation of the performance of the Board of Directors; and*
 - h. *pattern of work relations between the Board of Directors and the Board of Commissioners.*
 13. *Decisions of the Board of Directors taken in accordance with the guidelines and work procedures are binding and become the responsibility of all members of the Board of Directors.*
 14. *The Board of Directors must foster and realize the implementation of a Compliance Culture at all levels of the Bank's organization and business activities, and must ensure the implementation of the Bank's Compliance Function.*
 15. *Regarding Anti-Money Laundering, Prevention of Terrorism Financing and Prevention of Proliferation of Weapons of Mass Destruction (APU, PPT and PPPSPM), active supervision by the Board of Directors at least includes:*
 - a. *Proposing written policies and procedures regarding the implementation of AML-CTF & PFPWMD 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 PPPSPM; dan
- 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; dan
- g. Memastikan adanya pembahasan terkait penerapan program APU, PPT dan PPPSPM dalam rapat Direksi.
- h. Mereview dan menyetujui kebijakan, pengawasan dan prosedur pengelolaan serta mitigasi risiko TPPU, TPPT dan/atau PPPSPM dan dokumen penilaian risiko individual (*Internal Risk Assessment*) TPPU, TPPT dan/atau PPPSPM pada BSS.
- i. Bank wajib menerapkan program APUPPT dan PPPSPM secara efektif dengan memperhatikan risiko TPPU, TPPT, dan/atau PPSM serta kegiatan, skala usaha, kompleksitas usaha, dan/atau karakteristik usaha PJK yang mencakup;
- Pengawasan aktif Direksi dan Dewan Komisaris
 - Kebijakan dan prosedur
 - Pengendalian intern
 - System informasi manajemen
 - Sumber daya manusia dan pelatihan
- j. Direksi dilarang memberitahukan kepada Pengguna Jasa atau pihak lain, baik secara langsung maupun tidak langsung, dengan cara apa pun mengenai laporan Transaksi Keuangan Mencurigakan yang sedang disusun atau telah disampaikan kepada PPATK
- k. Direksi dilarang memberitahukan kepada Pengguna Jasa Keuangan atau pihak lain, baik secara langsung maupun tidak langsung, dengan cara apa pun mengenai laporan Transaksi Keuangan Mencurigakan Terkait Pendanaan Terorisme yang sedang disusun atau telah disampaikan kepada PPATK.
16. Terkait Penerapan Manajemen Risiko :
- a. Terkait *country risk* dan *transfer risk* Direksi wajib paling sedikit :
- menyusun dan menerapkan strategi dalam mengelola *transfer risk* dan *country risk* sesuai karakteristik dan kompleksitas Bank.
 - menetapkan limit dan memantau kepatuhan terhadap limit eksposur risiko.
- b. Ensuring that the implementation of APU, PPT and PPPSPM programs is carried out in accordance with the established written policies and procedures;
- c. Establishing special work units and/or appointing officials responsible for the implementation of APU, PPT and PPPSPM programs;
- d. Supervising the compliance of work units in implementing AML-CTF & PFPWMD programs;
- e. Ensuring that written policies and procedures regarding the implementation of APU, PPT and PPPSPM programs are in line with changes and developments in products, services, and technology in the financial services sector and in accordance with developments in AML-CTF & PFPWMD modes; and
- f. ensure that officials and/or employees, especially employees from related work units and new employees, have attended training related to the implementation of the APU, PPT and PPPSPM programs once every 1 (one) year; and
- g. Ensure that there is a discussion related to the implementation of the AML-CTF & PFPWMD programs in the Board of Directors meeting.
- h. Review and approve policies, supervision and procedures for the management and mitigation of AML-CTF and/or PFPWMD risks and individual risk assessment documents (*Internal Risk Assessment*) of AML-CTF and/or PFPWMD at the BSS.
- i. Banks are required to implement the AML-CTF & PFPWMD programs effectively by considering the risks of AML-CTF and/or PFPWMD as well as activities, business scale, business complexity, and/or characteristics of PJK businesses which include;
- Active supervision of the Board of Directors and Board of Commissioners
 - Policies and procedures
 - Internal control
 - Management information system
 - Human resources and training
- j. The Board of Directors is prohibited from notifying the Service Users or other parties, either directly or indirectly, in any way regarding the Suspicious Financial Transaction report that is being prepared or has been submitted to the PPATK
- k. The Board of Directors is prohibited from notifying the Financial Service Users or other parties, either directly or indirectly, in any way regarding the Suspicious Financial Transaction report related to Terrorism Funding that is being prepared or has been submitted to the PPATK.
16. Related to the Implementation of Risk Management:
- a. Related to *country risk* and *transfer risk*, the Board of Directors must at least:
- prepare and implement strategies in managing *transfer risk* and *country risk* according to the characteristics and complexity of the Bank.
 - set limits and monitor compliance with risk exposure limits.

- menyusun, menetapkan, dan memastikan penerapan kebijakan dan prosedur untuk mengidentifikasi, mengukur, memantau, dan mengendalikan risiko terkait *country risk* dan *transfer risk* dalam kegiatan usaha Bank.
 - melakukan pemantauan terhadap perkembangan *country risk* dan *transfer risk* dan menerapkan tindak lanjut yang memadai.
 - melakukan pengendalian risiko terhadap eksposur risiko untuk masing-masing negara, yang mencakup eksposur *intragroup*, berdasarkan regional tertentu, dan pihak lawan transaksi.
 - memiliki dan mengembangkan sistem informasi manajemen yang mampu menyediakan data secara akurat, lengkap, informatif, tepat waktu, dan dapat diandalkan sehingga dapat menyediakan laporan yang memadai.
 - melakukan evaluasi dan *stress testing* secara berkala paling sedikit 1 kali dalam 1 tahun atau berdasarkan kondisi tertentu yang berpengaruh signifikan kepada Bank; dan
 - memastikan pengendalian internal dan kaji ulang yang memadai atas *country risk* dan *transfer risk*.
- b. Direksi wajib menyusun dan menyampaikan hasil identifikasi, pengukuran, pemantauan, dan pengendalian *country risk* dan *transfer risk* dalam laporan profil risiko.
- c. Direksi wajib paling sedikit:
- menyusun kebijakan dan prosedur untuk mengidentifikasi dan mengelola aset bermasalah, klasifikasi aset, perhitungan terkait penyisihan dan pencadangan, dan hapus buku aset;
 - melakukan reviu secara berkala atas pengklasifikasian aset dan pencadangan untuk kredit dan/atau pembiayaan bermasalah, serta mengidentifikasi dan mengelola aset bermasalah secara memadai, termasuk pencadangan yang sejalan dengan risiko yang terjadi; dan
 - melakukan *review* secara berkala terhadap pencadangan yang dibentuk agar sesuai dengan kondisi terkini, sesuai standar dan ketentuan peraturan perundang-undangan.
- d. Direksi berwenang dan bertanggung jawab paling sedikit:
- menyusun kebijakan dan strategi Manajemen Risiko secara tertulis dan komprehensif;
 - bertanggung jawab atas pelaksanaan kebijakan Manajemen Risiko dan eksposur Risiko yang diambil oleh Bank secara keseluruhan;
 - mengevaluasi dan memutuskan transaksi yang memerlukan persetujuan Direksi;
 - mengembangkan budaya Manajemen Risiko pada seluruh jenjang organisasi;
 - memastikan peningkatan kompetensi sumber daya manusia yang terkait dengan Manajemen Risiko;
- *prepare, determine, and ensure the implementation of policies and procedures to identify, measure, monitor, and control risks related to country risk and transfer risk in the Bank's business activities.*
 - *monitor the development of country risk and transfer risk and implement adequate follow-up.*
 - *carry out risk control on risk exposure for each country, which includes intragroup exposure, based on certain regions, and counterparties.*
 - *have and develop a management information system that is able to provide accurate, complete, informative, timely, and reliable data so that it can provide adequate reports.*
 - *conduct periodic evaluations and stress testing at least once a year or based on certain conditions that have a significant impact on the Bank; and*
 - *ensure adequate internal control and review of country risk and transfer risk.*
- b. *The Board of Directors is required to prepare and submit the results of identification, measurement, monitoring, and control of country risk and transfer risk in the risk profile report.*
- c. *The Board of Directors is required to at least:*
- *prepare policies and procedures to identify and manage problematic assets, asset classification, calculations related to provisions and reserves, and write-offs of assets;*
 - *conduct periodic reviews of asset classification and reserves for problematic credit and/or financing, and identify and manage problematic assets adequately, including reserves in line with the risks that occur; and*
 - *conduct periodic reviews of reserves formed to comply with current conditions, in accordance with standards and provisions of laws and regulations.*
- d. *The Board of Directors is authorized and responsible for at least;*
- *prepare written and comprehensive Risk Management policies and strategies;*
 - *be responsible for the implementation of Risk Management policies and Risk exposures taken by the Bank as a whole;*
 - *evaluate and decide on transactions that require the approval of the Board of Directors;*
 - *develop a Risk Management culture at all levels of the organization;*
 - *ensure the improvement of human resource competency related to Risk Management;*

- memastikan bahwa fungsi Manajemen Risiko telah beroperasi secara independen; dan
- melaksanakan kaji ulang secara berkala untuk memastikan:
 - › keakuratan metodologi penilaian Risiko
 - › kecukupan implementasi sistem informasi Manajemen Risiko
 - › ketepatan kebijakan dan prosedur Manajemen Risiko serta penetapan limit Risiko
- e. Direksi harus memiliki pemahaman yang memadai mengenai risiko yang melekat pada seluruh aktivitas fungsional Bank dan mampu mengambil tindakan yang diperlukan sesuai dengan profil Risiko Bank.
- f. Untuk mendukung penerapan manajemen risiko secara efektif pada Bank, kepemilikan Sertifikat Manajemen Risiko bagi SDM salah satunya ditetapkan untuk: anggota Direksi.
- g. Sertifikasi Manajemen Risiko bagi anggota Direksi diselenggarakan oleh LSP sektor perbankan yang terdaftar di Otoritas Jasa Keuangan, yang disesuaikan dengan:
 - Unit kompetensi yang mengacu pada SKKNI bidang manajemen risiko perbankan
 - Jenjang kualifikasi yang mengacu pada KKNi bidang manajemen risiko perbankan, dengan memedomani dan memperhatikan:
 - › Ruang lingkup dan penerapan manajemen risiko sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan antara lain mengenai penerapan manajemen risiko bagi bank umum.
 - › Kegiatan usaha Bank yaitu kegiatan usaha konvensional, serta disesuaikan dengan perkembangan risiko terkini yang terkait dengan sektor perbankan antara lain terkait keamanan siber, perubahan iklim, dan perkembangan risiko lainnya.
- h. Masa berlaku dari Sertifikat Manajemen Risiko yaitu untuk jangka waktu 3 (tiga) tahun sejak tanggal penerbitan sertifikat dimaksud, dan dapat diperpanjang. Masa berlaku perpanjangan Sertifikat Manajemen Risiko adalah 3 (tiga) tahun setelah tanggal masa berlaku Sertifikat Manajemen Risiko sebelumnya berakhir.
- i. Kepemilikan Sertifikat Manajemen Risiko merupakan salah satu aspek penilaian faktor kompetensi dalam penilaian kemampuan dan kepatutan bagi calon anggota Direksi ketentuan Otoritas Jasa Keuangan mengenai penilaian kemampuan dan kepatutan bagi pihak utama lembaga jasa keuangan.
- j. Dalam hal anggota Direksi selama menduduki jabatan tidak memenuhi keberlakuan Sertifikat Manajemen Risiko dan/atau yang
 - ensure that the Risk Management function has been operating independently; and
 - conduct periodic reviews to ensure:
 - › the accuracy of the Risk assessment methodology
 - › the adequacy of the implementation of the Risk Management information system
 - › the accuracy of Risk Management policies and procedures and the determination of Risk limits
- e. The Board of Directors must have an adequate understanding of the risks inherent in all functional activities of the Bank and be able to take the necessary actions in accordance with the Bank's Risk profile.
- f. To support the implementation of effective risk management in the Bank, the ownership of the Risk Management Certificate for HR is stipulated for: members of the Board of Directors.
- g. Risk Management Certification for members of the Board of Directors is organized by the LSP banking sector registered with the Financial Services Authority, which is adjusted to:
 - Competency units referring to the SKKNI in the field of banking risk management
 - Qualification levels referring to the KKNi in the field of banking risk management, by referring to and paying attention to:
 - › The scope and application of risk management as regulated in the provisions of the Financial Services Authority, including regarding the application of risk management for commercial banks.
 - › The Bank's business activities are conventional business activities, and are adjusted to the latest risk developments related to the banking sector, including cybersecurity, climate change, and other risk developments.
- h. The validity period of the Risk Management Certificate is for a period of 3 (three) years from the date of issuance of the certificate in question, and can be extended. The validity period of the Risk Management Certificate extension is 3 (three) years after the date of the previous Risk Management Certificate expires.
- i. Ownership of a Risk Management Certificate is one aspect of the competency factor assessment in the assessment of the ability and propriety of prospective members of the Board of Directors the provisions of the Financial Services Authority regarding the assessment of the ability and propriety of the main parties of financial services institutions.
- j. In the event that a member of the Board of Directors during his/her tenure does not fulfill the validity of the Risk Management Certificate and/or the person

bersangkutan tidak melakukan upaya untuk memenuhi keberlakuan Sertifikat Manajemen Risiko tersebut, Bank harus mengganti anggota Direksi paling lambat:

- Dalam jangka waktu 6 (enam) bulan sejak berakhirnya masa berlaku Sertifikat Manajemen Risiko. Selama jangka waktu tersebut, anggota Direksi dimaksud dapat melakukan upaya untuk memenuhi keberlakuan Sertifikat Manajemen Risiko; atau
 - Dalam jangka waktu 6 (enam) bulan sejak tanggal penetapan dari Otoritas Jasa Keuangan mengenai pemenuhan keberlakuan Sertifikat Manajemen Risiko untuk memenuhi kondisi tertentu yang ditetapkan oleh Otoritas Jasa Keuangan. Selama jangka waktu tersebut, anggota Direksi dimaksud dapat melakukan upaya untuk memenuhi keberlakuan Sertifikat Manajemen Risiko. Kondisi tertentu antara lain didasarkan atas pertimbangan dalam hal pergantian anggota Direksi akan mempengaruhi operasional Bank.
- k. Dalam hal anggota Direksi, anggota Dewan Komisaris, dan Pejabat Eksekutif belum dapat memenuhi keberlakuan Sertifikat Manajemen Risiko dalam jangka waktu yang telah ditetapkan, Otoritas Jasa Keuangan dapat menetapkan jangka waktu lain dengan mempertimbangkan upaya pemenuhan Sertifikat Manajemen Risiko yang telah dilakukan.
- l. Kriteria pelaksanaan program akselerasi (*fast track*) dalam uji kompetensi Sertifikasi Manajemen Risiko yaitu:
- Berlaku untuk pihak yang akan dicalonkan dalam jabatan sebagai anggota Direksi baik yang belum atau telah ditetapkan dalam rapat umum pemegang saham, yang dibuktikan dengan surat pengantar permohonan pengajuan uji kompetensi yang ditandatangani oleh anggota Direksi dalam hal anggota Direksi berhalangan atau menolak menandatangani surat pengantar, dengan dilampirkan:
 - > Keputusan rapat umum pemegang saham yang menyatakan bahwa yang bersangkutan telah diangkat sebagai anggota Direksi oleh rapat umum pemegang saham
 - > Rekomendasi komite remunerasi dan nominasi dalam hal yang bersangkutan dicalonkan sebagai anggota Direksi dan belum diangkat oleh rapat umum pemegang saham.
 - Mempertimbangkan kemampuan atau kompetensi kerja dari pihak yang akan dicalonkan dalam jabatan sebagai anggota Direksi terkait dengan:

concerned does not make efforts to fulfill the validity of the Risk Management Certificate, the Bank must replace the member of the Board of Directors no later than:

- *Within a period of 6 (six) months from the end of the validity period of the Risk Management Certificate. During this period, the member of the Board of Directors in question may make efforts to fulfill the validity of the Risk Management Certificate; or*
 - *Within a period of 6 (six) months from the date of the determination of the Financial Services Authority regarding the fulfillment of the validity of the Risk Management Certificate to fulfill certain conditions set by the Financial Services Authority. During this period, the member of the Board of Directors in question may make efforts to fulfil the validity of the Risk Management Certificate. Certain conditions are based on considerations in the event that the replacement of members of the Board of Directors will affect the Bank's operations.*
- k. *In the event that members of the Board of Directors, members of the Board of Commissioners, and Executive Officers have not been able to fulfil the validity of the Risk Management Certificate within the specified time period, the Financial Services Authority may determine another time period by considering the efforts to fulfil the Risk Management Certificate that have been made.*
- l. *Criteria for implementing the acceleration program (fast track) in the Risk Management Certification competency test, namely:*
- *Applicable to parties who will be nominated for positions as members of the Board of Directors, whether or not they have been appointed in a general meeting of shareholders, as evidenced by a cover letter of application for a competency test signed by a member of the Board of Directors in the event that a member of the Board of Directors is unable to attend or refuses to sign the cover letter, with the following attachments:*
 - > *Decision of the general meeting of shareholders stating that the person concerned has been appointed as a member of the Board of Directors by the general meeting of shareholders*
 - > *Recommendation of the remuneration and nomination committee in the event that the person concerned is nominated as a member of the Board of Directors and has not been appointed by a general meeting of shareholders.*
 - *Considering the ability or work competence of the party to be nominated for the position as a member of the Board of Directors related to:*

- › Profil, yaitu pengalaman kerja atau portofolio di bidang keuangan atau pada otoritas di bidang keuangan
 - › Karakteristik, yaitu kekhususan karakter, nilai yang dimiliki, atau kekhususan lain yang dapat dipertimbangkan keterkaitannya pada Bank; dan/atau
 - › Spesialisasi kompetensi.
 - m. Terhadap pihak yang akan dicalonkan dalam jabatan sebagai anggota Direksi, program akselerasi (*fast track*) yang memenuhi kriteria hanya dapat dilakukan oleh yang bersangkutan dalam 1 (satu) kali kesempatan uji kompetensi Sertifikasi Manajemen Risiko di LSP sektor perbankan.
 - n. Dalam hal calon anggota Direksi telah mengikuti program akselerasi (*fast track*) dalam uji kompetensi Sertifikasi Manajemen Risiko di LSP sektor perbankan dengan hasil tidak kompeten (tidak lulus), maka yang bersangkutan:
 - Dapat mengikuti uji kompetensi Sertifikasi Manajemen Risiko yang dilaksanakan secara berjenjang (normal)
 - Tidak boleh mengikuti program akselerasi (*fast track*) berikutnya pada LSP sektor perbankan yang sama atau pada LSP sektor perbankan lain untuk uji kompetensi Sertifikasi Manajemen Risiko
 - o. Bagi anggota Direksi yang sebelumnya telah menjabat dan masih menjabat pada Bank pada saat skema Sertifikasi Manajemen Risiko berdasarkan KKNi terkini telah berlaku atau telah divalidasi dan/atau diverifikasi oleh instansi yang berwenang (Badan Nasional Sertifikasi Profesi), dilakukan penyesuaian terhadap kepemilikan Sertifikat Manajemen Risiko:
 - Area penyesuaian lebih difokuskan untuk unit kompetensi baru dari SKKNi dan KKNi di bidang manajemen risiko perbankan dibandingkan SKKNi dan KKNi sebelumnya
 - Mekanisme dan metode penyesuaian ditetapkan oleh LSP sektor perbankan berkoordinasi dengan Otoritas Jasa Keuangan, dengan ketentuan:
 - › Bagi Direksi pemilik Sertifikat Manajemen Risiko tingkat 5 atau setara jenjang kualifikasi 7, dilakukan penyesuaian yang lebih difokuskan untuk unit kompetensi baru dalam SKKNi dan KKNi.
 - › Bagi pemilik Sertifikat Manajemen Risiko tingkat 4 atau setara jenjang kualifikasi 6, tingkat 3 atau setara jenjang kualifikasi 5, dan tingkat 2 atau setara jenjang kualifikasi 5, dilakukan penyesuaian yang lebih difokuskan untuk unit kompetensi baru dalam SKKNi dan KKNi, termasuk unit kompetensi lain yang masih perlu dipenuhi. Setelah dilakukan penyesuaian, yang bersangkutan memenuhi kompetensi pada
- › *Profile, namely work experience or portfolio in the financial sector or in the authority in the financial sector*
 - › *Characteristics, namely the specific character, values possessed, or other specificities that can be considered related to the Bank; and/or*
 - › *Competency specialization.*
 - m. *For parties to be nominated for the position as members of the Board of Directors, the acceleration program (fast track) that meets the criteria can only be carried out by the person concerned in 1 (one) opportunity for the Risk Management Certification competency test at the LSP banking sector.*
 - n. *In the event that a prospective member of the Board of Directors has participated in the acceleration program (fast track) in the Risk Management Certification competency test at the LSP banking sector with an incompetent result (did not pass), then the person concerned:*
 - *Can participate in the Risk Management Certification competency test which is carried out in stages (normally)*
 - *May not participate in the next acceleration program (fast track) at the same banking sector LSP or at another banking sector LSP for the Risk Management Certification competency test*
 - o. *For members of the Board of Directors who have previously served and are still serving at the Bank at the time the Risk Management Certification scheme based on the latest KKNi has been in effect or has been validated and/or verified by the authorized agency (National Professional Certification Agency), an alignment is carried out on the ownership of the Risk Management Certificate:*
 - *The alignment area is more focused on new competency units from SKKNi and KKNi in the field of banking risk management compared to the previous SKKNi and KKNi*
 - *The mechanism and method of alignment are determined by the banking sector LSP in coordination with the Financial Services Authority, with the following provisions:*
 - › *For Directors who own a level 5 Risk Management Certificate or equivalent to qualification level 7, an alignment is carried out that is more focused on new competency units in SKKNi and KKNi.*
 - › *For holders of Risk Management Certificate level 4 or equivalent to qualification level 6, level 3 or equivalent to qualification level 5, and level 2 or equivalent to qualification level 5, a more focused alignment is carried out for new competency units in SKKNi and KKNi, including other competency units that still need to be fulfilled. After the alignment is carried out, the person concerned fulfills the competency at qualification level 7.*

jenjang kualifikasi 7.

- Dalam pelaksanaan penyalarsan, dilakukan melalui koordinasi antar LSP sektor perbankan dan dilaksanakan dalam periode waktu yang sama
- p. Bagi calon anggota Direksi, penyalarsan terhadap kepemilikan Sertifikat Manajemen Risiko dilakukan oleh LSP sektor perbankan.
- q. Kepemilikan Sertifikat Manajemen Risiko yang masih berlaku sebelum berlakunya skema Sertifikasi Kompetensi Kerja manajemen risiko berdasarkan SKKNI dan KKNi, tetap diakui dalam proses penilaian kemampuan dan kepatutan bagi calon anggota Direksi sepanjang:
 - Kepemilikan Sertifikat Manajemen Risiko memenuhi ketentuan sesuai PBI Sertifikasi Manajemen Risiko dan dilakukan penyetaraan
 - Dalam hal setelah dilakukan belum memenuhi jenjang kualifikasi yang ditetapkan bagi anggota Direksi sesuai KKNi:
 - › Pemenuhan penjenjangan termasuk dengan melalui penyalarsan terhadap kepemilikan Sertifikat Manajemen Risiko dapat dipenuhi paling lambat selama 6 (enam) bulan setelah ditetapkan sebagai anggota Direksi.
 - › Otoritas Jasa Keuangan dapat menetapkan jangka waktu lain, antara lain dengan mempertimbangkan upaya pemenuhan yang telah dilakukan atau pertimbangan pemenuhan komposisi pengurus Bank.
 - › Dalam hal anggota Direksi belum memenuhi jenjang kualifikasi yang ditetapkan bagi anggota Direksi sesuai KKNi sesuai jangka waktu yang telah ditetapkan, Bank harus mengganti anggota Direksi dimaksud pada rapat umum pemegang saham terdekat.
- r. Mengenai Jenjang Kualifikasi 7 Bidang Manajemen Risiko Perbankan mensyaratkan Direksi mempunyai kemampuan keahlian dalam merencanakan penerapan manajemen risiko dan mengelola sumber daya di bawah tanggung jawabnya, dan mengevaluasi secara komprehensif penerapan manajemen risiko dengan mengacu kepada ketentuan perundang-undangan dan regulasi yang berlaku, praktik umum yang terbaik serta standar dan prosedur kerja di organisasi untuk menghasilkan langkah-langkah pengembangan strategis manajemen risiko secara *enterprise*.
- s. Mengenai Jenjang Kualifikasi 7 Bidang Manajemen Risiko mensyaratkan kemampuan untuk mampu memecahkan permasalahan dalam manajemen risiko melalui pendekatan monodisipliner serta mampu melakukan riset dan mengambil keputusan strategis dengan akuntabilitas dan tanggung jawab penuh atas semua aspek pengelolaan risiko
 - *In implementing the alignment, it is carried out through coordination between LSPs in the banking sector and is carried out in the same time period*
 - p. *For prospective members of the Board of Directors, the alignment of ownership of the Risk Management Certificate is carried out by the LSP banking sector.*
 - q. *Ownership of a Risk Management Certificate that is still valid before the enactment of the Risk Management Work Competency Certification scheme based on SKKNI and KKNi, will still be recognized in the process of assessing the ability and propriety of prospective members of the Board of Directors as long as:*
 - *Ownership of the Risk Management Certificate meets the provisions according to PBI Risk Management Certification and is equivalized*
 - *In the event that after being carried out it has not met the qualification level set for members of the Board of Directors according to KKNi:*
 - › *Fulfillment of the leveling including through alignment of ownership of the Risk Management Certificate can be fulfilled no later than 6 (six) months after being appointed as a member of the Board of Directors.*
 - › *The Financial Services Authority may determine another time period, including by considering the fulfillment efforts that have been made or consideration of the fulfillment of the composition of the Bank's management.*
 - › *In the event that a member of the Board of Directors has not met the qualification level set for members of the Board of Directors according to the KKNi according to the time period that has been determined, the Bank must replace the member of the Board of Directors in question at the nearest general meeting of shareholders.*
 - r. *Regarding the Qualification Level of 7 Banking Risk Management Fields, it requires the Board of Directors to have expertise in planning the implementation of risk management and managing resources under their responsibility, and comprehensively evaluating the implementation of risk management by referring to applicable laws and regulations, best general practices and standards and work procedures in the organization to produce strategic steps for developing risk management in an enterprise manner.*
 - s. *Regarding the Qualification Level of 7 Risk Management Fields, it requires the ability to be able to solve problems in risk management through a monodisciplinary approach and be able to conduct research and make strategic decisions with full accountability and responsibility for all aspects of risk management that are under the responsibility*

- yang berada di bawah tanggung jawab bidang keahliannya.
- t. Anggota Direksi membudayakan pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang perbankan dan perkembangan terkini terkait bidang keuangan atau bidang lain yang mendukung pelaksanaan tugas dan tanggung jawab pada seluruh tingkatan atau jenjang organisasi.
- u. Direksi mengangkat anggota komite berdasarkan pada keputusan rapat Dewan Komisaris.
- v. Setiap keputusan rapat yang diambil Direksi dapat diimplementasikan dan sesuai dengan kebijakan, pedoman serta tata tertib kerja yang berlaku.
- w. Direksi mengkomunikasikan kepada pegawai mengenai arah bisnis Bank dalam rangka pencapaian misi dan visi Bank
- x. Anggota Direksi terus meningkatkan pengetahuan, keahlian, dan kemampuan dalam pengelolaan Bank, yang ditunjukkan dengan peningkatan kerja individu sesuai tugas dan tanggung jawab, peningkatan kinerja Bank, penyelesaian permasalahan yang dihadapi Bank, dan pencapaian hasil sesuai ekspektasi Pemangku Kepentingan Bank.
- y. Anggota Direksi terus meningkatkan budaya pembelajaran secara berkelanjutan dalam rangka peningkatan pengetahuan tentang perbankan dan perkembangan terkini terkait bidang keuangan atau bidang lain yang mendukung pelaksanaan dan tanggung jawab, ditunjukkan dengan peningkatan keikutsertaan dalam sertifikasi perbankan dan/atau pendidikan atau pelatihan dalam rangka pengembangan kualitas individu.
17. Terkait Penerapan Manajemen Risiko Teknologi Informasi, Direksi :
- a. Menetapkan Rencana Strategis Teknologi Informasi dan kebijakan Bank terkait penggunaan Teknologi Informasi;
- b. Menetapkan kebijakan, standar, dan prosedur terkait penyelenggaraan Teknologi Informasi yang memadai dan mengomunikasikannya secara efektif, baik pada satuan kerja penyelenggara maupun pengguna Teknologi Informasi;
- c. Memastikan:
- Teknologi Informasi yang digunakan Bank dapat mendukung perkembangan usaha Bank, pencapaian tujuan bisnis Bank dan kelangsungan pelayanan terhadap nasabah Bank;
 - Terdapat kegiatan peningkatan kompetensi sumber daya manusia yang terkait dengan penyelenggaraan dan penggunaan Teknologi Informasi;
- of their field of expertise.*
- t. *Members of the Board of Directors cultivate continuous learning in order to increase knowledge about banking and the latest developments related to the financial sector or other fields that support the implementation of duties and responsibilities at all levels or levels of the organization.*
- u. *The Board of Directors appoints committee members based on the decision of the Board of Commissioners meeting.*
- v. *Every decision taken by the Board of Directors meeting can be implemented and in accordance with the applicable policies, guidelines and work procedures.*
- w. *The Board of Directors communicates to employees regarding the direction of the Bank's business in order to achieve the Bank's mission and vision*
- x. *Members of the Board of Directors continue to improve their knowledge, expertise, and abilities in managing the Bank, as indicated by improving individual work according to duties and responsibilities, improving the Bank's performance, resolving problems faced by the Bank, and achieving results according to the expectations of the Bank's Stakeholders.*
- y. *Members of the Board of Directors continue to improve the culture of continuous learning in order to improve knowledge about banking and the latest developments related to finance or other fields that support the implementation and responsibilities, as indicated by increasing participation in banking certification and/or education or training in order to develop individual quality.*
17. *Related to the Implementation of Information Technology Risk Management, the Board of Directors:*
- a. *Determine the Information Technology Strategic Plan and the Bank's policies related to the use of Information Technology;*
- b. *Determine policies, standards, and procedures related to the implementation of adequate Information Technology and communicate them effectively, both to the work units that implement and use Information Technology;*
- c. *Ensure:*
- *Information Technology used by the Bank can support the development of the Bank's business, the achievement of the Bank's business objectives and the continuity of service to the Bank's customers;*
 - *There are activities to improve the competence of human resources related to the implementation and use of Information Technology;*

- Ketersediaan sistem pengelolaan pengamanan informasi (*information security management system*) yang efektif dan dikomunikasikan kepada satuan kerja pengguna dan penyelenggara Teknologi Informasi;
 - d. Penerapan proses manajemen risiko dalam penggunaan Teknologi Informasi dilaksanakan secara memadai dan efektif;
 - e. Kebijakan, standar, dan prosedur Teknologi Informasi diterapkan secara efektif pada satuan kerja pengguna dan penyelenggara Teknologi Informasi;
 - f. Terdapat sistem pengukuran kinerja proses penyelenggaraan Teknologi Informasi yang paling sedikit dapat mendukung proses pemantauan terhadap implementasi strategi; mendukung penyelesaian proyek pengembangan Teknologi Informasi; mengoptimalkan pendayagunaan sumber daya manusia dan investasi pada infrastruktur; dan meningkatkan kinerja proses penyelenggaraan Teknologi Informasi dan kualitas layanan penyampaian hasil proses kepada pengguna Teknologi Informasi.
 - g. Bank wajib menetapkan wewenang dan tanggung jawab yang jelas dari Direksi, dan pejabat pada setiap jenjang jabatan yang terkait dengan penerapan tata kelola TI.
 - h. Direksi berwenang dan bertanggung jawab;
 - mengevaluasi tujuan strategis, mengarahkan pejabat eksekutif Bank, dan memantau seluruh kegiatan penyelenggaraan TI untuk memastikan:
 - > penerapan tata kelola TI sesuai dengan kebutuhan dan karakteristik Bank;
 - > efektivitas dan efisiensi penyelenggaraan TI secara keseluruhan untuk memberikan manfaat yang optimal bagi Bank;
 - > penerapan proses manajemen risiko dalam penyelenggaraan TI dilaksanakan secara efektif;
 - > tersedianya sumber daya yang memadai terkait penyelenggaraan TI untuk mendukung bisnis Bank secara efektif dan efisien; dan
 - > dukungan dan keterlibatan pemangku kepentingan dalam penerapan tata kelola TI.
 - i. Bank membentuk komite pengarah TI, yang paling sedikit beranggotakan: direktur yang membawahkan satuan kerja penyelenggara TI, direktur yang membawahkan satuan kerja manajemen risiko, pejabat tertinggi yang memimpin satuan kerja penyelenggara TI, dan pejabat tertinggi yang memimpin satuan kerja pengguna TI.
 - j. Komite pengarah TI diketuai oleh salah satu direktur Bank merangkap sebagai anggota.
- *The availability of an effective information security management system and is communicated to the work units that use and implement Information Technology;*
 - d. *The implementation of the risk management process in the use of Information Technology is carried out adequately and effectively;*
 - e. *Information Technology policies, standards, and procedures are implemented effectively in the work units that use and implement Information Technology;*
 - f. *There is a performance measurement system for the implementation of Information Technology that can at least support the monitoring process for the implementation of strategies; support the completion of Information Technology development projects; optimizing the utilization of human resources and investment in infrastructure; and improving the performance of the Information Technology implementation process and the quality of service delivery of process results to Information Technology users.*
 - g. *Banks are required to establish clear authority and responsibility of the Board of Directors, and officials at each level of office related to the implementation of IT governance.*
 - h. *The Board of Directors is authorized and responsible;*
 - *evaluating strategic objectives, directing the Bank's executive officers, and monitoring all IT implementation activities to ensure:*
 - > *the implementation of IT governance in accordance with the needs and characteristics of the Bank;*
 - > *the effectiveness and efficiency of IT implementation as a whole to provide optimal benefits for the Bank;*
 - > *the implementation of risk management processes in IT implementation is carried out effectively;*
 - > *the availability of adequate resources related to IT implementation to support the Bank's business effectively and efficiently; and*
 - > *support and involvement of stakeholders in the implementation of IT governance.*
 - i. *The Bank forms an IT steering committee, which at least consists of: a director in charge of the IT implementation work unit, a director in charge of the risk management work unit, the highest official leading the IT implementation work unit, and the highest official leading the IT user work unit.*
 - j. *The IT steering committee is chaired by one of the Bank's directors who also serves as a member.*

- k. Direksi menetapkan arahan untuk aktivitas pengelolaan TI untuk mencapai tujuan bisnis Bank.
18. Dalam hal anggota Direksi hanya terdiri dari 1 (satu) orang direktur, tugas dan tanggung jawab direktur yang membawahkan fungsi kepatuhan dilaksanakan oleh kepala satuan kerja kepatuhan Bank paling lama 6 (enam) bulan.
19. Direktur pengganti dilarang untuk dipenuhi dari pihak lain selain dari anggota Direksi yang sedang menjabat, kecuali karena pemenuhan ketentuan peraturan perundangundangan.
20. Bidang tugas direktur yang dipenuhi oleh direktur pengganti wajib berlaku paling lama 6 (enam) bulan.
21. Dalam hal diperlukan, pembidangan tugas direktur pengganti dapat diperpanjang berdasarkan pertimbangan tertentu dari Bank dan mendapatkan persetujuan Otoritas Jasa Keuangan.
22. Bank wajib memastikan ketersediaan dan kecukupan pelaporan internal yang didukung oleh sistem informasi manajemen yang memadai untuk meningkatkan kualitas proses pengambilan keputusan oleh Direksi dan kualitas proses pengawasan oleh Dewan Komisaris.
23. Rencana korporasi wajib disusun oleh Direksi dan disetujui oleh Dewan Komisaris.
24. Dalam hal terdapat kondisi eksternal dan internal yang secara signifikan mempengaruhi sasaran dan strategi Bank sebagaimana dimuat dalam rencana korporasi yang sedang berjalan, Bank dapat melakukan perubahan rencana korporasi.
25. Perubahan rencana korporasi wajib disusun oleh Direksi dan disetujui oleh Dewan Komisaris.
26. Rencana Bisnis wajib disusun oleh Direksi dan disetujui oleh Dewan Komisaris dan wajib melaksanakan Rencana Bisnis secara efektif.
27. Direksi wajib menyusun Rencana Aksi Keuangan Berkelanjutan dan disetujui Dewan Komisaris
28. Direksi PUJK menugaskan fungsi atau unit Literasi Keuangan untuk menyusun rencana kegiatan dalam rangka meningkatkan Literasi Keuangan dan menyusun laporan realisasi kegiatan dalam rangka meningkatkan Literasi Keuangan.
29. Direksi PUJK menugaskan fungsi atau unit Inklusi Keuangan untuk menyusun rencana kegiatan dalam rangka meningkatkan Inklusi Keuangan dan menyusun laporan realisasi kegiatan dalam rangka meningkatkan Inklusi Keuangan.
30. Terkait dengan Perlindungan Konsumen Direksi wajib;
- bertanggung jawab atas kepatuhan pelaksanaan Perlindungan Konsumen
 - Direksi wajib menunjuk:
- k. *The Board of Directors determines the direction for IT management activities to achieve the Bank's business objectives.*
18. *In the event that the Board of Directors consists of only one (1) director, the duties and responsibilities of the director who oversees the compliance function are carried out by the head of the compliance unit of the Bank for a maximum of 6 (six) months.*
19. *The replacement director is prohibited from being filled by a party other than the incumbent member of the Board of Directors, except for the fulfillment of provisions of laws and regulations.*
20. *The field of duties of the director filled by the replacement director must be valid for a maximum of 6 (six) months.*
21. *If necessary, the field of duties of the replacement director can be extended based on certain considerations from the Bank and obtain approval from the Financial Services Authority.*
22. *The Bank is required to ensure the availability and adequacy of internal reporting supported by an adequate management information system to improve the quality of the decision-making process by the Board of Directors and the quality of the supervision process by the Board of Commissioners.*
23. *The corporate plan must be prepared by the Board of Directors and approved by the Board of Commissioners.*
24. *In the event that there are external and internal conditions that significantly affect the Bank's goals and strategies as stated in the ongoing corporate plan, the Bank may make changes to the corporate plan.*
25. *Changes to the corporate plan must be prepared by the Board of Directors and approved by the Board of Commissioners.*
26. *The Business Plan must be prepared by the Board of Directors and approved by the Board of Commissioners and must implement the Business Plan effectively.*
27. *The Board of Directors must prepare a Sustainable Financial Action Plan and have it approved by the Board of Commissioners*
28. *The PUJK Board of Directors assigns the Financial Literacy function or unit to prepare an activity plan in order to improve Financial Literacy and prepare a report on the realization of activities in order to improve Financial Literacy.*
29. *The PUJK Board of Directors assigns the Financial Inclusion function or unit to prepare an activity plan in order to improve Financial Inclusion and prepare a report on the realization of activities in order to improve Financial Inclusion.*
30. *Related to Consumer Protection The Board of Directors must;*
- be responsible for compliance with the implementation of Consumer Protection*
 - The Board of Directors must appoint:*

- Anggota Direksi atau pejabat setingkat di bawah Direksi di kantor pusat dan
 - Pejabat dan/atau Pegawai di setiap kantor selain kantor pusat yang menjalankan fungsi atau unit perlindungan konsumen
 - Pejabat yang menjalankan fungsi atau unit perlindungan Konsumen sebagaimana dimaksud bertanggung jawab langsung kepada direksi terkait
 - Direksi dilarang memperkaya atau menguntungkan diri sendiri atau pihak lain
 - Direksi dilarang menyalahgunakan kewenangan, kesempatan, atau sarana yang ada padanya karena jabatan atau kedudukannya, yang berakibat merugikan Konsumen.
- c. Bank wajib bertanggung jawab atas kerugian Konsumen yang timbul akibat kesalahan, kelalaian, dan/atau perbuatan yang bertentangan dengan ketentuan peraturan perundang-undangan di sektor jasa keuangan, yang dilakukan oleh Direksi, Dewan Komisaris, Pegawai, dan/atau pihak ketiga yang bekerja untuk atau mewakili kepentingan Bank
- d. Direksi menandatangani surat pengantar dalam bentuk cetak atas penyampaian laporan rencana, laporan realisasi, penyesuaian laporan, dan perubahan laporan terkait Literasi Keuangan dan Inklusi Keuangan, laporan layanan pengaduan, dan laporan penilaian sendiri secara luar jaringan dan/atau dalam jaringan sebelum disampaikan kepada OJK.
- e. Direksi menerima laporan mengenai implementasi Pelindungan Konsumen dan Masyarakat, serta memberikan rekomendasi untuk perbaikan dan pengembangan Pelindungan Konsumen dan Masyarakat untuk Fungsi atau Unit Kerja Pelindungan Konsumen.
- f. Bank wajib menyusun dan menyampaikan laporan Layanan Pengaduan dan penilaian sendiri (*self assessment*) kepada Otoritas Jasa Keuangan melalui Direksi.
- g. Direksi harus memiliki kapasitas yang memadai dalam memberikan layanan atas penggunaan produk dan/atau layanan.
- h. Direksi wajib bertanggung jawab atas kepatuhan pelaksanaan ketentuan Peraturan Otoritas Jasa Keuangan, dengan menunjuk anggota Direksi atau pejabat setingkat di bawah Direksi di kantor pusat dan pejabat dan/atau pegawai di setiap kantor selain kantor pusat, yang menjalankan fungsi atau unit Pelindungan Konsumen
31. Terkait dengan Ketentuan Pemberian Data Nasabah Direksi dapat:
- *Members of the Board of Directors or officials at the same level as the Board of Directors at the head office and*
 - *Officials and/or Employees at each office other than the head office who carry out consumer protection functions or units*
 - *Officials who carry out consumer protection functions or units as referred to are directly responsible to the relevant board of directors*
 - *The Board of Directors is prohibited from enriching or benefiting themselves or other parties*
 - *The Board of Directors is prohibited from abusing the authority, opportunities, or facilities available to them because of their position or position, which results in losses to Consumers.*
- c. *The Bank must be responsible for Consumer losses arising from errors, negligence, and/or actions that are contrary to the provisions of laws and regulations in the financial services sector, carried out by the Board of Directors, Board of Commissioners, Employees, and/or third parties who work for or represent the interests of the Bank*
- d. *The Board of Directors signs a cover letter in printed form for the submission of the plan report, realization report, report adjustments, and changes to the report related to Financial Literacy and Financial Inclusion, complaint service report, and self-assessment report offline and/or online before being submitted to the OJK.*
- e. *The Board of Directors receives reports on the implementation of Consumer and Community Protection, and provides recommendations for the improvement and development of Consumer and Community Protection for the Consumer Protection Function or Work Unit.*
- f. *Banks are required to prepare and submit Complaint Service reports and self-assessments to the Financial Services Authority through the Board of Directors.*
- g. *The Board of Directors must have adequate capacity in providing services for the use of products and/or services.*
- h. *The Board of Directors must be responsible for compliance with the implementation of the provisions of the Financial Services Authority Regulation, by appointing members of the Board of Directors or officials at the same level as the Board of Directors at the head office and officials and/or employees at each office other than the head office, who carry out the Consumer Protection function or unit*
31. *Regarding the Provisions on Provision of Customer Data, the Board of Directors may:*

- a. Dalam perkara perdata antara bank dengan nasabahnya, Direksi dapat menginformasikan kepada Pengadilan tentang keadaan keuangan nasabah yang bersangkutan dan dapat memberikan keterangan lain yang relevan dengan perkara tersebut.
- b. Dalam perkara perdata antara Nasabah dan Nasabah, Direksi harus menginformasikan kepada pengadilan tentang keadaan keuangan Nasabah dan informasi lain yang relevan dengan perkara berdasarkan permintaan ketua pengadilan negeri, ketua pengadilan tinggi, atau Ketua Mahkamah Agung.
- c. Dalam rangka tukar menukar informasi antarbank, Direksi dapat memberitahukan keadaan keuangan nasabahnya kepada bank lain.
32. Direktur yang membawahkan Fungsi Kepatuhan wajib menyampaikan laporan kepada Otoritas Jasa Keuangan tentang pelaksanaan tugasnya, meliputi:
- a. Rencana kerja kepatuhan yang dimuat dalam Rencana Bisnis Bank
- b. Laporan Kepatuhan
- c. Laporan khusus mengenai kebijakan dan/atau keputusan Direksi yang menurut direktur yang membawahkan Fungsi Kepatuhan telah menyimpang dari ketentuan Otoritas Jasa Keuangan dan/atau ketentuan peraturan perundang-undangan.
33. Merujuk pada Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas,
- a. Direksi Perseroan wajib mengadakan dan menyimpan daftar pemegang saham, yang memuat minimal:
- Nama dan alamat pemegang saham;
 - Jumlah, nomor, tanggal perolehan saham yang dimiliki pemegang saham, dan klasifikasinya dalam hal dikeluarkan lebih dari satu klasifikasi saham;
 - Jumlah yang disetor atas setiap saham;
 - Nama dan alamat dari orang perseorangan atau badan hukum yang mempunyai hak gadai atas saham atau sebagai penerima jaminan fidusia saham dan tanggal perolehan hak gadai atau tanggal pendaftaran jaminan fidusia tersebut
 - Keterangan penyetoran saham dalam bentuk lain
- b. Direksi Perseroan wajib mengadakan dan menyimpan daftar khusus yang memuat keterangan mengenai saham anggota Direksi dan Dewan Komisaris beserta keluarganya dalam Perseroan dan/atau pada Perseroan lain serta tanggal saham itu diperoleh.
- c. Direksi wajib mencatat pemindahan hak atas saham, tanggal, dan hari pemindahan hak tersebut dalam daftar pemegang saham atau daftar khusus dan
- a. *In civil cases between banks and their customers, the Board of Directors may inform the Court about the financial condition of the customer concerned and may provide other information relevant to the case.*
- b. *In civil cases between Customers and Customers, the Board of Directors must inform the court about the financial condition of the Customer and other information relevant to the case based on the request of the head of the district court, the head of the high court, or the Chief Justice of the Supreme Court.*
- c. *In order to exchange information between banks, the Board of Directors may inform other banks about the financial condition of its customers.*
32. *The Director in charge of the Compliance Function is required to submit a report to the Financial Services Authority regarding the implementation of his/her duties, including:*
- a. *Compliance work plan contained in the Bank's Business Plan*
- b. *Compliance Report*
- c. *Special report regarding policies and/or decisions of the Board of Directors which, according to the director in charge of the Compliance Function, have deviated from the provisions of the Financial Services Authority and/or provisions of laws and regulations.*
33. *Referring to Law No. 40 of 2007 concerning Limited Liability Companies,*
- a. *The Company's Board of Directors is required to hold and keep a list of shareholders, which contains at least:*
- *Name and address of shareholders;*
 - *Number, number, date of acquisition of shares owned by shareholders, and their classification in the event that more than one classification of shares is issued;*
 - *Amount paid for each share;*
 - *Name and address of the individual or legal entity that has a pledge right on shares or as a recipient of a share fiduciary guarantee and the date of acquisition of the pledge right or the date of registration of the fiduciary guarantee*
 - *Information on share deposits in other forms*
- b. *The Company's Board of Directors is required to hold and keep a special list containing information on the shares of members of the Board of Directors and Board of Commissioners and their families in the Company and/or in other Companies and the date the shares were acquired.*
- c. *The Board of Directors is required to record the transfer of rights to shares, the date, and day of the transfer of rights in the shareholders list or*

- memberitahukan perubahan susunan pemegang saham kepada Menteri untuk dicatat dalam daftar Perseroan maksimal 30 hari terhitung sejak tanggal pencatatan pemindahan hak.
- d. Direksi menyusun rencana kerja tahunan sebelum dimulainya tahun buku yang akan datang.
- Anggaran dasar dapat menentukan rencana kerja yang disampaikan oleh Direksi harus mendapat persetujuan Dewan Komisaris atau RUPS.
 - Dalam hal Direksi tidak menyampaikan rencana kerja, rencana kerja tahun yang lampau diberlakukan.
34. Direksi menyampaikan laporan tahunan kepada RUPS untuk dapat diperiksa oleh pemegang saham setelah ditelaah oleh Dewan Komisaris dan ditandatangani oleh semua anggota Direksi dan semua anggota Dewan Komisaris yang menjabat pada tahun buku yang bersangkutan dalam jangka waktu paling lambat 6 (enam) bulan setelah tahun buku Perseroan berakhir.
- a. Jika terdapat anggota Direksi yang tidak menandatangani laporan tahunan, yang bersangkutan harus menyebutkan alasannya secara tertulis, atau alasan tersebut dinyatakan oleh Direksi dalam surat tersendiri yang dilekatkan dalam laporan tahunan.
- b. Jika terdapat anggota Direksi yang tidak menandatangani laporan tahunan dan tidak memberi alasan secara tertulis, yang bersangkutan dianggap telah menyetujui isi laporan tahunan.
35. Direksi wajib menyerahkan laporan keuangan pada akuntan publik untuk diaudit apabila kegiatan usaha Perseroan adalah menghimpun dan/atau mengelola dana masyarakat, Perseroan menerbitkan surat pengakuan utang kepada masyarakat, Perseroan mempunyai aset dan/atau jumlah peredaran usaha dengan jumlah nilai paling sedikit Rp50.000.000.000,- atau diwajibkan oleh peraturan perundang-undangan. Direksi turut menyampaikan hasil laporan audit akuntan publik kepada RUPS secara tertulis.
- a. Dalam hal laporan keuangan yang disediakan ternyata tidak benar dan/atau menyesatkan, anggota Direksi dan anggota Dewan Komisaris secara tanggung renteng bertanggung jawab terhadap pihak yang dirugikan.
- b. Anggota Direksi dan anggota Dewan Komisaris dibebaskan dari tanggung jawab apabila terbukti bahwa keadaan tersebut bukan karena kesalahannya.
36. Direksi menyelenggarakan RUPS tahunan dan RUPS lain dengan didahului pemanggilan RUPS, kemudian Direksi wajib melakukan pemanggilan RUPS dalam jangka waktu paling lambat 15 hari terhitung sejak tanggal permintaan penyelenggaraan RUPS diterima. Direksi turut melakukan pemanggilan kepada pemegang saham sebelum menyelenggarakan RUPS.
- special list and notify the Minister of changes in the composition of shareholders to be recorded in the Company register a maximum of 30 days from the date of recording the transfer of rights.*
- d. *The Board of Directors shall prepare an annual work plan before the start of the upcoming financial year.*
- *The articles of association may determine that the work plan submitted by the Board of Directors must be approved by the Board of Commissioners or the GMS.*
 - *In the event that the Board of Directors does not submit a work plan, the previous year's work plan shall apply.*
34. *The Board of Directors shall submit an annual report to the GMS to be examined by shareholders after being reviewed by the Board of Commissioners and signed by all members of the Board of Directors and all members of the Board of Commissioners serving in the relevant financial year within a maximum period of 6 (six) months after the Company's financial year ends.*
- a. *If there is a member of the Board of Directors who does not sign the annual report, the person concerned must state the reason in writing, or the reason is stated by the Board of Directors in a separate letter attached to the annual report.*
- b. *If there is a member of the Board of Directors who does not sign the annual report and does not provide a reason in writing, the person concerned is deemed to have approved the contents of the annual report.*
35. *The Board of Directors is required to submit financial reports to a public accountant for audit if the Company's business activities are collecting and/or managing public funds, the Company issues a letter of acknowledgement of debt to the public, the Company has assets and/or business turnover with a minimum value of Rp50,000,000,000,-, or is required by laws and regulations. The Board of Directors also submits the results of the public accountant's audit report to the GMS in writing.*
- a. *In the event that the financial report provided turns out to be incorrect and/or misleading, members of the Board of Directors and members of the Board of Commissioners are jointly and severally liable to the injured party.*
- b. *Members of the Board of Directors and members of the Board of Commissioners are released from responsibility if it is proven that the situation is not due to their fault.*
36. *The Board of Directors holds an annual GMS and other GMS preceded by a summons for a GMS, then the Board of Directors is required to summon a GMS within a maximum period of 15 days from the date the request for holding a GMS is received. The Board of Directors also summons shareholders before holding a GMS.*

37. Dalam pemungutan suara, anggota Direksi dilarang bertindak sebagai kuasa dari pemegang saham.
38. Direksi menjalankan pengurusan Perseroan untuk kepentingan Perseroan dan sesuai dengan maksud dan tujuan Perseroan.
39. Perseroan yang kegiatan usahanya berkaitan dengan menghimpun dan/atau mengelola dana masyarakat, Perseroan yang menerbitkan surat pengakuan utang kepada masyarakat, atau Perseroan Terbuka wajib mempunyai paling sedikit 2 (dua) orang anggota Direksi.
- Dalam hal Direksi terdiri atas 2 (dua) anggota Direksi atau lebih, pembagian tugas dan wewenang pengurusan di antara anggota Direksi ditetapkan berdasarkan keputusan RUPS.
 - Dalam hal RUPS tidak menetapkan, pembagian tugas dan wewenang anggota Direksi ditetapkan berdasarkan keputusan Direksi.
40. Anggota Direksi diangkat oleh RUPS untuk jangka waktu tertentu dan dapat diangkat kembali.
41. Dalam hal terjadi pengangkatan, penggantian, dan pemberhentian anggota Direksi, Direksi wajib memberitahukan perubahan anggota Direksi kepada Menteri untuk dicatat dalam daftar Perseroan dalam jangka waktu paling lambat 30 (tiga puluh) hari terhitung sejak tanggal keputusan RUPS tersebut.
- Pemberitahuan ini tidak termasuk pemberitahuan yang disampaikan oleh Direksi baru atas pengangkatan dirinya sendiri.
42. Pengangkatan anggota Direksi yang tidak memenuhi persyaratan karena hukum sejak saat anggota Direksi lainnya atau Dewan Komisaris mengetahui tidak terpenuhinya persyaratan tersebut.
- Dalam jangka waktu paling lambat 7 (tujuh) hari terhitung sejak diketahui, anggota Direksi lainnya atau Dewan Komisaris harus mengumumkan batalnya pengangkatan anggota Direksi yang bersangkutan dalam surat kabar dan memberitahukannya kepada Menteri untuk dicatat dalam daftar Perseroan.
 - Perbuatan hukum yang telah dilakukan untuk dan atas nama Perseroan oleh anggota Direksi sebelum pengangkatannya batal, tetap mengikat dan menjadi tanggung jawab Perseroan.
43. Direksi bertanggung jawab atas pengurusan Perseroan dan wajib dilaksanakan dengan itikad baik dan penuh tanggung jawab.
- Setiap anggota Direksi bertanggung jawab penuh secara pribadi atas kerugian Perseroan apabila yang bersangkutan bersalah atau lalai menjalankan tugasnya.
 - Jika Direksi terdiri atas 2 (dua) anggota Direksi atau lebih, tanggung jawab berlaku secara tanggung renteng bagi setiap anggota Direksi.
- 37. In voting, members of the Board of Directors are prohibited from acting as proxies for shareholders.*
- 38. The Board of Directors carries out the management of the Company for the interests of the Company and in accordance with the intent and purpose of the Company.*
- 39. Companies whose business activities are related to collecting and/or managing public funds, Companies that issue debt acknowledgment letters to the public, or Public Companies must have at least 2 (two) members of the Board of Directors.*
- In the event that the Board of Directors consists of 2 (two) or more members of the Board of Directors, the division of tasks and authority of management among the members of the Board of Directors is determined based on a decision of the GMS.*
 - In the event that the GMS does not determine, the division of tasks and authority of the members of the Board of Directors is determined based on a decision of the Board of Directors.*
- 40. Members of the Board of Directors are appointed by the GMS for a certain period of time and can be reappointed.*
- 41. In the event of the appointment, replacement, and dismissal of members of the Board of Directors, the Board of Directors must notify the Minister of changes in the members of the Board of Directors to be recorded in the Company register within a maximum period of 30 (thirty) days from the date of the GMS decision.*
- This notification does not include notification submitted by the new Board of Directors regarding their own appointment.*
- 42. Appointment of members of the Board of Directors who do not meet the requirements due to law from the time the other members of the Board of Directors or the Board of Commissioners become aware that the requirements have not been met.*
- Within a maximum period of 7 (seven) days from the time it is known, other members of the Board of Directors or the Board of Commissioners must announce the cancellation of the appointment of the relevant member of the Board of Directors in a newspaper and notify the Minister to be recorded in the Company register.*
 - Legal acts that have been carried out for and on behalf of the Company by members of the Board of Directors before their appointment is cancelled, remain binding and are the responsibility of the Company.*
- 43. The Board of Directors is responsible for the management of the Company and must be carried out in good faith and with full responsibility.*
- Each member of the Board of Directors is fully responsible personally for the Company's losses if the person concerned is guilty or negligent in carrying out his duties.*
 - If the Board of Directors consists of 2 (two) or more members of the Board of Directors, the responsibility applies jointly and severally to each member of the Board of Directors.*

- Anggota Direksi tidak dapat dipertanggungjawabkan atas kerugian Perseroan apabila dapat membuktikan: kerugian tersebut bukan karena kesalahan atau kelalaiannya
 - telah melakukan pengurusan dengan itikad baik dan kehati-hatian untuk kepentingan dan sesuai dengan maksud dan tujuan Perseroan
 - tidak mempunyai benturan kepentingan baik langsung maupun tidak langsung atas tindakan pengurusan yang mengakibatkan kerugian
 - telah mengambil tindakan untuk mencegah timbul atau berlanjutnya kerugian tersebut.
44. Direksi mewakili Perseroan baik di dalam maupun di luar pengadilan. Dalam hal anggota Direksi terdiri lebih dari 1 (satu) orang, yang berwenang mewakili Perseroan adalah setiap anggota Direksi, kecuali ditentukan lain dalam anggaran dasar.
- a. Kewenangan Direksi untuk mewakili Perseroan tidak terbatas dan tidak bersyarat, kecuali ditentukan lain dalam undang-undang ini, anggaran dasar, atau keputusan RUPS.
45. Anggota Direksi tidak berwenang mewakili Perseroan apabila terjadi perkara di pengadilan antara Perseroan dengan anggota Direksi yang bersangkutan atau anggota Direksi yang bersangkutan mempunyai benturan kepentingan dengan Perseroan.
- a. Jika hal tersebut terjadi, maka yang berhak mewakili Perseroan adalah anggota Direksi lainnya yang tidak mempunyai benturan kepentingan dengan Perseroan, Dewan Komisaris dalam hal seluruh anggota Direksi mempunyai benturan kepentingan dengan Perseroan, atau pihak lain yang ditunjuk oleh RUPS dalam hal seluruh anggota Direksi atau Dewan Komisaris mempunyai benturan kepentingan dengan Perseroan.
46. Direksi wajib meminta persetujuan RUPS untuk mengalihkan kekayaan Perseroan atau menjadikan jaminan utang kekayaan Perseroan; yang merupakan lebih dari 50% (lima puluh persen) jumlah kekayaan bersih Perseroan dalam 1 (satu) transaksi atau lebih, baik yang berkaitan satu sama lain maupun tidak.
- Ketentuan ini tidak berlaku terhadap tindakan pengalihan atau penjaminan kekayaan Perseroan yang dilakukan oleh Direksi sebagai pelaksanaan kegiatan usaha Perseroan sesuai dengan anggaran dasarnya.
47. Direksi dapat memberi kuasa tertulis kepada 1 (satu) orang karyawan Perseroan atau lebih atau kepada orang lain untuk dan atas nama Perseroan melakukan perbuatan hukum tertentu.
- *Members of the Board of Directors cannot be held responsible for losses to the Company if they can prove that: the loss was not due to their fault or negligence*
 - *they have carried out management in good faith and with care for the interests and in accordance with the intent and purpose of the Company*
 - *they do not have a conflict of interest, either directly or indirectly, regarding management actions that result in losses*
 - *they have taken action to prevent the occurrence or continuation of such losses.*
44. *The Board of Directors represents the Company both inside and outside the court. In the event that the Board of Directors consists of more than 1 (one) person, the person authorized to represent the Company is each member of the Board of Directors, unless otherwise specified in the articles of association.*
- a. *The authority of the Board of Directors to represent the Company is unlimited and unconditional, unless otherwise specified in this law, the articles of association, or the resolution of the GMS.*
45. *Members of the Board of Directors are not authorized to represent the Company if a case occurs in court between the Company and the relevant member of the Board of Directors or the relevant member of the Board of Directors has a conflict of interest with the Company.*
- a. *If this occurs, then the party authorized to represent the Company is another member of the Board of Directors who does not have a conflict of interest with the Company, the Board of Commissioners in the event that all members of the Board of Directors have a conflict of interest with the Company, or another party appointed by the GMS in the event that all members of the Board of Directors or the Board of Commissioners have a conflict of interest with the Company.*
46. *The Board of Directors is required to request the approval of the GMS to transfer the Company's assets or to use the Company's assets as collateral for debt; which constitutes more than 50% (fifty percent) of the Company's net assets in 1 (one) or more transactions, whether related to each other or not.*
- This provision does not apply to the transfer or guarantee of the Company's assets carried out by the Board of Directors as the implementation of the Company's business activities in accordance with its articles of association.*
47. *The Board of Directors may grant written power of attorney to 1 (one) or more employees of the Company or to other persons for and on behalf of the Company to carry out certain legal acts.*

48. Anggota Direksi dapat diberhentikan sewaktu-waktu berdasarkan keputusan RUPS dengan menyebutkan alasannya. Keputusan ini diambil setelah yang bersangkutan telah diberi tahu terlebih dahulu tentang rencana pemberhentian dan diberi kesempatan untuk membela diri dalam RUPS, namun tidak diperlukan apabila yang bersangkutan tidak berkeberatan atas pemberhentian ini.
49. Jika terjadi pembubaran Perseroan (karena keputusan RUPS atau jangka waktu berdirinya yang ditetapkan dalam anggaran dasar telah berakhir) atau dicabutnya kepaillitan berdasarkan keputusan pengadilan niaga, Direksi bertindak sebagai likuidator apabila RUPS tidak menunjuk likuidator.
- a. Direksi tidak boleh melakukan perbuatan hukum baru atas nama Perseroan apabila jangka waktu berdirinya Perseroan yang ditetapkan dalam anggaran dasar telah berakhir.
50. Direksi mengungkapkan kepada pegawai mengenai kebijakan Bank yang bersifat strategis di bidang kepegawaian, yang dilakukan melalui sarana yang diketahui atau diakses dengan mudah oleh pegawai
51. Direksi dilarang memberikan kuasa umum kepada pihak lain yang mengakibatkan pengalihan tugas dan fungsi Direksi
52. Segala keputusan Direksi diambil sesuai dengan pedoman dan tata tertib kerja, yang mengikat dan menjadi tanggung jawab seluruh anggota Direksi. Dalam hal terjadi perbedaan pendapat (*dissenting opinion*), dicantumkan secara jelas dalam risalah rapat Direksi beserta alasan perbedaan pendapat. Terkait dengan hal tersebut, salinan risalah rapat Direksi yang telah ditandatangani oleh seluruh anggota Direksi yang hadir, harus didistribusikan kepada seluruh anggota Direksi.
53. Direksi, bersama Dewan Komisaris, komite-komite, dan satuan kerja pada Bank termasuk dalam struktur Tata Kelola Bank.
54. Direksi menandatangani laporan penilaian sendiri (*self-assessment*) penerapan Tata Kelola.
48. *Members of the Board of Directors may be dismissed at any time based on a decision of the GMS by stating the reasons. This decision is taken after the person concerned has been notified in advance of the planned dismissal and given the opportunity to defend himself in the GMS, but is not necessary if the person concerned does not object to this dismissal.*
49. *If the Company is dissolved (due to a decision of the GMS or the term of its establishment as stipulated in the articles of association has ended) or the bankruptcy is revoked based on a decision of the commercial court, the Board of Directors acts as a liquidator if the GMS does not appoint a liquidator.*
- a. *The Board of Directors may not perform new legal acts on behalf of the Company if the term of the Company's establishment as stipulated in the articles of association has ended.*
50. *The Board of Directors discloses to employees regarding the Bank's strategic policies in the field of personnel, which are carried out through means known or easily accessible by employees*
51. *The Board of Directors is prohibited from granting general power of attorney to other parties that result in the transfer of duties and functions of the Board of Directors*
52. *All decisions of the Board of Directors are taken in accordance with the guidelines and work procedures, which are binding and are the responsibility of all members of the Board of Directors. In the event of a difference of opinion (dissenting opinion), it is clearly stated in the minutes of the Board of Directors meeting along with the reasons for the difference of opinion. In relation to this, a copy of the minutes of the Board of Directors meeting that has been signed by all members of the Board of Directors present, must be distributed to all members of the Board of Directors.*
53. *The Board of Directors, together with the Board of Commissioners, committees, and work units at the Bank are included in the Bank's Governance structure.*
54. *The Board of Directors signs a self-assessment report on the implementation of Governance.*

Pembagian Tugas Antar Direksi

Implementation of Duties and Responsibilities

Berikut disampaikan pembagian tugas dan tanggung jawab masing-masing Direksi Bank Sahabat Sampoerna.

The duties and responsibilities of each member of the Board of Directors of the Bank are as follows.

Direktur Utama <i>President Director</i>	
Sisi Finansial <i>Financial Side</i>	Mengelola dan memastikan pencapaian target dan kualitas bisnis Bank, namun tidak terbatas pada pertumbuhan portofolio perkreditan dan dana pihak ketiga beserta target lainnya yang ditetapkan dalam Rencana Bisnis Bank. <i>To manage and ensure target achievement and the Bank's business quality, but not limited to the growth of credit portfolio and third-party funds along with other targets set in the Bank's Business Plan.</i>
Sisi Nasabah <i>Customer Side</i>	Mengendalikan, mengawasi, dan menjalankan fungsi hubungan masyarakat terkait pengenalan Bank kepada masyarakat umum. <i>To control, supervise, and perform public relations functions related to the introduction of the Bank to the general public.</i>
Sisi SDM <i>HR Side</i>	<ul style="list-style-type: none"> • Mengendalikan dan mengawasi kegiatan pengelolaan dan pengembangan sumber daya manusia, dengan menyeimbangkan antara Visi dan Misi Bank, <i>best practice</i> secara umum, serta peraturan dan perundang-undangan yang berlaku. • Mengendalikan dan mengawasi pelaksanaan pemberian wewenang kepada pejabat atau fungsi yang dapat bertindak atas nama Bank, namun tidak terbatas pada batas wewenang pemutus kredit, pengelolaan sumber daya manusia, pengeluaran biaya, serta pengawasan dan pengendalian Bank. • <i>To control and oversee the management and development of human resources by balancing the Bank's Vision and Missions, best practices in general, and the applicable laws and regulations.</i> • <i>To control and supervise the granting of authority to officials or functions that may act on behalf of the Bank, but not limited to the limits of authority for credit approval, human resource management, expenses, as well as supervision and control of the Bank.</i>
Sisi Proses <i>Process Side</i>	<ul style="list-style-type: none"> • Mengendalikan dan mengawasi penyusunan dan pelaksanaan kebijakan, prosedur, dan pedoman kerja pada masing-masing fungsi sejalan dengan strategi Bank yang telah ditetapkan, namun tidak terbatas pada hal-hal terkait manajemen risiko, prinsip mengenal nasabah, dan pencegahan atas transaksi mencurigakan. • Memantau dan menjaga kepatuhan Bank terhadap seluruh ketentuan yang berlaku, maupun terhadap perjanjian dan komitmen yang dilaksanakan Bank dengan pihak lain. • Menetapkan kerangka manajemen risiko melalui pembentukan komite-komite pendukung pengelolaan manajemen risiko. • Memantau dan mengelola aktivitas fungsi manajemen risiko berdasarkan kebijakan dan prosedur manajemen risiko, termasuk merancang model operasi manajemen risiko. • Bertanggung jawab atas kebenaran dan keabsahan data pelaporan kegiatan pengendalian internal Bank kepada pihak-pihak yang berkepentingan (tidak terbatas pada Bank Indonesia, Pemegang Saham, dan badan eksternal lainnya). • <i>To control and supervise the preparation and implementation of policies, procedures, and work guidelines for each function in line with the Bank's established strategy, but not limited to matters related to risk management, know-your customer principle, and prevention of suspicious transactions.</i> • <i>To monitor and maintain the Bank's compliance with all applicable provisions, as well as agreements and commitments implemented by the Bank with other parties.</i> • <i>To establish a risk management framework by establishing committees supporting risk management.</i> • <i>To monitor and manage the activities of the risk management function based on risk management policies and procedures, including designing risk management operations models.</i> • <i>To be responsible for the authenticity and validity of reporting data of the Bank's internal control activities to interested parties (not limited to Bank Indonesia, Shareholders, and other external bodies).</i>

Direktur Keuangan & Perencanaan Bisnis <i>Finance & Business Planning Director</i>	
Sisi Finansial <i>Financial Side</i>	Memimpin pengelolaan operasional keuangan dan perencanaan bisnis, termasuk dan tidak terbatas terhadap pengembangan produk-produk Bank. <i>To lead the operational management of Finance and Business Planning, including but not limited to the development of Bank products.</i>
Sisi Nasabah <i>Customer Side</i>	Merumuskan arahan strategis yang sejalan dengan Visi dan Misi Bank untuk memastikan pengelolaan, pertumbuhan, dan pencapaian keuangan sesuai dengan perencanaan bisnis. <i>To formulate strategic directions in line with the Bank's Vision and Mission to ensure that financial management, growth, and achievement are in line with the business plan.</i>
Sisi SDM <i>HR Side</i>	<ul style="list-style-type: none"> • Bertanggung jawab melakukan supervisi terhadap pejabat/karyawan pada masing-masing divisi yang berada dalam cakupan tugasnya. • Bertanggung jawab atas pengelolaan dan pengembangan karier dan kompetensi SDM dalam cakupan kerjanya. • <i>To be responsible for supervising officials/employees in each division within the scope of the duties.</i> • <i>To be responsible for career and competence management and development of HR in the scope of work.</i>
Sisi Proses <i>Process Side</i>	<ul style="list-style-type: none"> • Bertanggung jawab atas penyusunan rencana kerja dan anggaran dari Fungsi Keuangan dan Perencanaan Bisnis, termasuk melakukan pemantauan dan pengawasan terhadap realisasi atas pencapaian rencana kerja dan anggaran tersebut. • Mengelola dan memastikan pencapaian target dan kualitas hasil kerja. • Mengendalikan dan mengawasi penyusunan dan pelaksanaan kebijakan, prosedur, dan pedoman kerja sejalan dengan strategi Bank yang telah ditetapkan, termasuk namun tidak terbatas pada hal-hal terkait manajemen risiko, prinsip mengenal nasabah, dan pencegahan atas transaksi mencurigakan. • Memastikan kepatuhan terhadap seluruh ketentuan internal, termasuk memantau pelaksanaan pengendalian internal yang dilakukan oleh fungsi Audit Internal secara efektif dan memantau tindak lanjut atas temuan, baik oleh internal dan eksternal audit. • Mengawasi dan memimpin pengelolaan hubungan dan/atau transaksi usaha dan keuangan Bank dengan memerhatikan prinsip kehati-hatian dan <i>good corporate governance</i> (GCG). • <i>To be responsible for preparing work plans and budgets for the Finance and Business Planning Function, including monitoring and supervising the actual achievement of the work plans and budgets.</i> • <i>To manage and ensure target achievement and quality of work results.</i> • <i>To control and supervise the preparation and implementation of Policies, Procedures, and Work Guidelines in line with the Bank's established strategy, including but not limited to matters related to risk management, know your-customer principle, and prevention of suspicious transactions.</i> • <i>To ensure compliance with all internal regulations, including monitoring the internal control carried out by the Internal Audit function effectively and monitoring the follow-up on findings, both by internal and external audits.</i> • <i>To supervise and lead the management of the Bank's business and financial relationships and/or transactions by observing the prudential principle and good corporate governance (GCG).</i>

Direktur Teknologi Informasi <i>Information Technology Director</i>	
Sisi Finansial <i>Financial Side</i>	Mengelola kegiatan operasional Bank dan penyediaan sistem teknologi informasi dalam upaya mendukung kebutuhan bisnis dan pelaksanaan penerapan manajemen risiko. <i>To manage the Bank's operational activities and the provision of information technology systems in an effort to support business needs and implementation of risk management.</i>
Sisi Nasabah <i>Customer Side</i>	Mengendalikan, mengawasi, dan menjalankan fungsi untuk menjaga tingkat kepuasan nasabah kepada layanan Bank secara umum. <i>To control, supervise, and carry out functions to maintain customer satisfaction with the Bank's services in general</i>
Sisi SDM <i>HR Side</i>	<ul style="list-style-type: none"> • Bertanggung jawab melakukan supervisi terhadap pejabat/karyawan pada masing-masing divisi yang berada dalam cakupan tugasnya. • Bertanggung jawab atas pengelolaan dan pengembangan karier dan kompetensi SDM dalam cakupan kerjanya, termasuk namun tidak terbatas pada hal-hal terkait manajemen risiko dan kepatuhan. • <i>To be responsible for supervising officials/employees in each division within the scope of duties</i> • <i>To be responsible for career and competence management and development of HR in the scope of work, including but not limited to matters related to risk management and compliance.</i>
Sisi Proses <i>Process Side</i>	<ul style="list-style-type: none"> • Mengendalikan dan mengawasi penyusunan dan pelaksanaan kebijakan, prosedur, dan pedoman kerja terkait kegiatan operasional dan transaksi Bank serta sistem teknologi informasi. • Bertanggung jawab atas kegiatan operasional Bank dalam upaya mendukung kebutuhan bisnis dan pelaksanaan penerapan manajemen risiko. • Mengendalikan dan mengawasi kegiatan operasional Bank secara keseluruhan, termasuk kegiatan transaksi serta akurasi dan keamanan sistem teknologi yang digunakan dalam mendukung seluruh kegiatan operasional dan transaksional. • Merancang, menetapkan, serta mengevaluasi keseluruhan sistem teknologi informasi dalam upaya menciptakan suatu sistem yang terintegrasi dan dapat dioperasikan secara efektif dan efisien dalam mendukung kebutuhan bisnis dan pelaksanaan penerapan manajemen risiko. • Turut bertanggung jawab atas pelaksanaan kebijakan manajemen risiko dan eksposur risiko yang diambil oleh Bank secara keseluruhan, terutama dalam aspek kegiatan operasional dan sistem teknologi. • Mempertanggungjawabkan laporan kegiatan operasional Bank kepada pihak-pihak yang berkepentingan (namun tidak terbatas pada Bank Indonesia, Pemegang Saham, dan badan eksternal lainnya). • <i>To control and supervise the preparation and implementation of policies, procedures, and work guidelines related to the Bank's operational activities, transactions, and information technology system.</i> • <i>To be responsible for the Bank's operational activities in an effort to support business needs and implement risk management.</i> • <i>To control and oversee the Bank's operational activities overall, including transaction activities, as well as the accuracy and security of the technology system used in supporting all operational and transactional activities.</i> • <i>To design, determine, and evaluate the entire information technology system in an effort to create an integrated system that can be operated effectively and efficiently in supporting business needs and implementing risk management.</i> • <i>To also be responsible for the implementation of risk management policies and risk exposures taken by the Bank as a whole, especially in aspects of operational activities and technology systems.</i> • <i>To be responsible for the report of Bank's operational activities to interested parties (but not limited to Bank Indonesia, Shareholders, and other external bodies).</i>

Direktur Bisnis UMKM <i>ESME Business Director</i>	
Sisi Finansial <i>Financial Side</i>	<ul style="list-style-type: none"> Mengelola dan memastikan pencapaian target dan kualitas bisnis kredit mikro. Mengelola inisiatif perancangan bisnis dan produk baru Bank. <i>To manage and ensure target achievement and micro-credit business quality.</i> <i>To manage the Bank's new business and product design initiatives.</i>
Sisi Nasabah <i>Customer Side</i>	<p>Mengelola dan memastikan pertumbuhan portofolio kredit mikro yang sehat dan berkualitas baik, serta portofolio untuk bisnis dan produk baru lainnya.</p> <p><i>To manage and ensure the growth of a healthy and good quality micro-credit portfolio, as well as portfolios for businesses and other new products.</i></p>
Sisi SDM <i>HR Side</i>	<ul style="list-style-type: none"> Bertanggung jawab melakukan supervisi terhadap pejabat/karyawan pada masing-masing divisi yang berada dalam cakupan tugasnya. Bertanggung jawab atas pengelolaan dan pengembangan karier dan kompetensi SDM dalam cakupan kerjanya, termasuk namun tidak terbatas pada aspek yang terkait dengan manajemen risiko dan kepatuhan. <i>To be responsible for supervising officials/employees in each division within the scope of duties.</i> <i>To be responsible for career and competence management and development of HR in the scope of work, including but not limited to aspects related to risk management and compliance.</i>
Sisi Proses <i>Process Side</i>	<ul style="list-style-type: none"> Mengendalikan dan mengawasi penyusunan dan pelaksanaan kebijakan, prosedur, dan pedoman kerja terkait bisnis mikro dan pengembangan bisnis serta produk baru. Memberi masukan untuk kebijakan perkreditan dan produk Bank, berdasarkan hasil evaluasi bisnis dan kebutuhan pasar. <i>To control and supervise the preparation and implementation of policies, procedures, and work guidelines related to micro business and the development of new businesses and products.</i> <i>To give input to the Bank's credit and product policies based on the results of business evaluations and market needs.</i>
Direktur Kepatuhan & Manajemen Risiko <i>Compliance & Risk Director</i>	
Sisi Finansial <i>Financial Side</i>	<p>Mengelola aspek kepatuhan dan manajemen risiko Bank dalam upaya mendukung kebutuhan bisnis, termasuk:</p> <ul style="list-style-type: none"> Mengelola risiko yang dihadapi oleh Divisi Bisnis, terutama namun tidak terbatas pada risiko kepatuhan, risiko hukum, risiko strategis, risiko kredit, risiko operasional, risiko pasar, risiko likuiditas, dan risiko reputasi; serta Membangun dan mengelola bisnis resiliensi Bank. <p><i>To manage the Bank's compliance and risk management aspects in an effort to support business needs, including:</i></p> <ul style="list-style-type: none"> <i>To manage the risks confronted by the Business Division, especially but not limited to compliance risk, legal risk, strategic risk, credit risk, operational risk, market risk, liquidity risk, and reputation risk; and</i> <i>To build and manage the Bank's resilience business.</i>
Sisi Nasabah <i>Customer Side</i>	<p>Mengelola dan memantau kondisi pasar dan nasabah melalui hasil analisa riset pasar dan nasabah.</p> <p><i>To manage and monitor market and customer conditions through the results of market and customer research analysis.</i></p>
Sisi SDM <i>HR Side</i>	<ul style="list-style-type: none"> Bertanggung jawab melakukan supervisi terhadap pejabat/karyawan pada masing-masing divisi yang berada dalam cakupan tugasnya. Bertanggung jawab atas pengelolaan serta pengembangan karier dan kompetensi SDM dalam cakupan kerjanya, namun tidak terbatas pada hal-hal terkait manajemen risiko dan kepatuhan. <i>To be responsible for supervising officials/employees in each division within the scope their duties.</i> <i>To be responsible for career and competence management and development of HR in the scope of work, but not limited to matters related to risk management and compliance.</i>
Sisi Proses <i>Process Side</i>	<ul style="list-style-type: none"> Mengusulkan, mengendalikan, dan mengawasi penyusunan dan pelaksanaan kebijakan, prosedur, sistem dan pedoman kerja pada masing-masing fungsi sejalan dengan strategi Bank yang telah ditetapkan, serta kegiatan usaha yang dilakukan Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan, Bank Indonesia, dan peraturan perundang-undangan, namun tidak terbatas pada hal-hal terkait manajemen risiko, prinsip mengenal nasabah, dan pencegahan atas transaksi mencurigakan. Memantau dan menjaga kepatuhan Bank terhadap seluruh ketentuan yang berlaku, maupun terhadap perjanjian dan komitmen yang dilaksanakan Bank dengan pihak lain. Menetapkan kerangka manajemen risiko melalui pembentukan komite-komite pendukung pengelolaan manajemen risiko. Memantau dan mengelola aktivitas fungsi manajemen risiko berdasarkan kebijakan dan prosedur manajemen risiko, termasuk merancang model operasi manajemen risiko. Bertanggung jawab atas kebenaran dan keabsahan data pelaporan kegiatan pengendalian internal Bank kepada pihak-pihak yang berkepentingan (tidak terbatas pada Bank Indonesia, Pemegang Saham, dan badan eksternal lainnya). Merumuskan strategi guna mendorong terciptanya budaya kepatuhan. <i>To propose, control, and supervise the preparation and implementation of policies, procedures, systems, and work guidelines for each function in line with the Bank's established strategies and business activities conducted by the Bank in accordance with the provisions of the Financial Services Authority, Bank Indonesia, and laws and regulations, but not limited to matters related to risk management, know-your-customer principle, and prevention of suspicious transactions.</i> <i>To monitor and maintain the Bank's compliance with all applicable provisions, as well as agreements and commitments implemented by the Bank with other parties.</i> <i>To establish a risk management framework by establishing committees supporting risk management.</i> <i>To monitor and manage the activities of the risk management function based on risk management policies and procedures, including designing risk management operations models.</i> <i>To be responsible for the authenticity and validity of reporting data of the Bank's internal control activities to interested parties (not limited to Bank Indonesia, Shareholders, and other external bodies).</i> <i>To formulate strategies to encourage the Bank's compliance culture growth.</i>

Benturan Kepentingan

Pedoman dan Tata Tertib Direksi mengatur mengenai kebijakan benturan kepentingan anggota Direksi, antara lain:

1. Anggota Direksi harus menghindari potensi atau menempatkan diri untuk tidak terjadi benturan kepentingan. Dalam hal benturan kepentingan tidak dapat dihindari, anggota Direksi wajib mengungkapkan potensi benturan kepentingan dimaksud dan dilarang melakukan tindakan yang dapat merugikan atau mengurangi keuntungan Bank.
2. Dalam hal Direktur yang membawahkan fungsi kepatuhan mempunyai benturan kepentingan dengan Bank, maka daftar pemenuhan persyaratan (*compliance checklist*) ditandatangani oleh anggota Direksi lainnya.
 - a. Anggota Direksi dilarang mengambil tindakan yang berpotensi merugikan Bank atau mengurangi keuntungan Bank.
 - b. Dalam hal terdapat benturan kepentingan atau potensi benturan kepentingan dari pegawai atau pejabat calon anggota Direksi sehubungan dengan pencalonan yang bersangkutan pada Bank, calon yang bersangkutan mengungkapkan benturan kepentingan dalam proses penilaian kemampuan dan kepatutan.
3. Dalam hal terdapat benturan kepentingan atau potensi benturan kepentingan dari pegawai atau pejabat calon anggota Direksi sehubungan dengan pencalonan yang bersangkutan pada Bank, calon yang bersangkutan mengungkapkan benturan kepentingan dalam proses penilaian kemampuan dan kepatutan
4. Dalam hal berdasarkan penilaian Otoritas Jasa Keuangan terdapat benturan kepentingan atau potensi benturan kepentingan dari pegawai atau pejabat calon anggota Direksi sehubungan dengan pencalonan yang bersangkutan pada Bank, Otoritas Jasa Keuangan berwenang menetapkan tindakan pengawasan yang diperlukan
5. Dalam hal anggota Direksi tidak dapat menjalankan fungsinya atau mempunyai benturan kepentingan, permohonan diajukan oleh:
 - a. anggota Direksi lainnya yang tidak mempunyai benturan kepentingan;
 - b. anggota Dewan Komisaris apabila seluruh anggota Direksi tidak dapat menjalankan fungsinya atau mempunyai benturan kepentingan; atau
 - c. pihak lain yang ditunjuk oleh RUPS apabila seluruh anggota Direksi atau anggota Dewan Komisaris tidak dapat menjalankan fungsinya atau mempunyai benturan kepentingan.

Etika Kerja

Kebijakan terkait etika kerja Direksi telah dijelaskan dalam Pedoman dan Tata Tertib Kerja Direksi Bank Sahabat Sampoerna, sebagai berikut:

Conflict of Interest

The Board Manual of the Board of Directors regulates the policy on conflicts of interest for members of the Board of Directors, including:

1. *Members of the Board of Directors must avoid potential or position themselves so that there is no conflict of interest. In the event that a conflict of interest cannot be avoided, members of the Board of Directors must disclose the potential conflict of interest and are prohibited from taking actions that could harm or reduce the Bank's profits.*
2. *In the event that the Director in charge of the compliance function has a conflict of interest with the Bank, then the compliance checklist is signed by other members of the Board of Directors*
 - a. *Members of the Board of Directors are prohibited from taking actions that have the potential to harm the Bank or reduce the Bank's profits.*
 - b. *In the event of a conflict of interest or potential conflict of interest from an employee or official who is a candidate for a member of the Board of Directors in connection with the nomination related to the Bank, the candidate concerned shall disclose the conflict of interest in the fit and proper assessment process.*
3. *In the event of a conflict of interest or potential conflict of interest from an employee or officer who is a candidate member of the Board of Directors in connection with their nomination at the Bank, the candidate in question must disclose the conflict of interest during the fit and proper test process.*
4. *In the event that, based on the assessment of the Financial Services Authority, there is a conflict of interest or potential conflict of interest from an employee or officer who is a candidate member of the Board of Directors in connection with their nomination at the Bank, the Financial Services Authority has the authority to determine the necessary supervisory actions.*
5. *In the event that a member of the Board of Directors cannot perform their functions or has a conflict of interest, a request is submitted by:*
 - a. *Other members of the Board of Directors who do not have a conflict of interest;*
 - b. *Members of the Board of Commissioners if all members of the Board of Directors cannot perform their functions or have a conflict of interest; or*
 - c. *Other parties appointed by the GMS if all members of the Board of Directors or members of the Board of Commissioners cannot perform their functions or have a conflict of interest.*

Work Ethics

The policy related to the work ethics of the Board of Directors is included in the Board Manual of the Board of Directors of Bank Sahabat Sampoerna as follows.

1. Setiap anggota Direksi wajib melaksanakan tugas dan tanggung jawab dengan itikad baik, penuh tanggung jawab, dan kehati-hatian, dengan mengutamakan kepentingan Bank secara profesional, serta bekerja dan berperilaku dengan integritas tinggi.
2. Anggota Direksi wajib berorientasi kepada pemenuhan asas kepatuhan terhadap hukum, tunduk pada kode etik Bank dan kebijakan internal Bank lainnya, serta peraturan perundang-undangan yang berlaku.
3. Anggota Direksi dilarang memanfaatkan Bank dan/atau informasi yang diperoleh dari Bank untuk kepentingan pribadi, keluarga, dan/atau pihak lain yang dapat merugikan dan/atau mengurangi keuntungan serta reputasi Bank maupun anak perusahaannya.
4. Anggota Direksi dilarang mengambil dan/atau menerima keuntungan pribadi dari Bank selain remunerasi dan fasilitas lainnya yang ditetapkan RUPS dan/atau kebijakan internal.
5. Anggota Direksi wajib mengungkapkan remunerasi dan fasilitas lain sesuai dengan ketentuan mengenai penerapan tata kelola dalam pemberian remunerasi bagi bank umum.
6. Anggota Direksi dilarang merangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris atau pejabat eksekutif pada bank, perusahaan dan/atau lembaga lain.
7. Anggota Direksi dilarang merangkap jabatan pada bidang tugas fungsional di bank dan/atau lembaga keuangan bukan bank di dalam negeri maupun luar negeri. Direksi dapat merangkap jabatan dengan kriteria:
 - a. Bertanggung jawab terhadap pengawasan atas penyertaan Bank pada perusahaan anak, menjalankan tugas fungsional menjadi Dewan Komisaris ada perusahaan anak bukan bank yang dikendalikan
 - b. bertanggung jawab terhadap pengawasan atas penyertaan Bank pada perusahaan anak, menjalankan tugas fungsional menjadi anggota
 - c. Dewan Komisaris pada perusahaan anak bukan bank yang dikendalikan oleh Bank
 - d. Bertanggung jawab terhadap pengawasan dana pensiun atau menjalankan tugas sebagai dewan pengawas dana pensiun, yang dimiliki oleh Bank
 - e. Melaksanakan tugas sebagai direktur pengganti
 - f. Menduduki jabatan pada organisasi atau lembaga nirlaba, sepanjang tidak mengakibatkan yang bersangkutan mengabaikan pelaksanaan tugas dan tanggung jawab sebagai anggota Direksi

Poin (i) dan (ii) wajib mendapatkan persetujuan dari rapat Dewan Komisaris dan Poin (iv) wajib dilaporkan dalam rapat Dewan Komisaris. Calon anggota Direksi yang memiliki jabatan rangkap pada Poin (c.i, c.ii, dan c.iv), wajib membuat pernyataan untuk: menjaga

Points (i) and (ii) must obtain approval from the Board of Commissioners meeting and Point (iv) must be reported in the Board of Commissioners meeting. Prospective members of the Board of Directors who hold dual positions in Points (c.i, c.ii, and c.iv), are

integritas, menghindari segala bentuk benturan kepentingan, dan menghindari tindakan yang dapat merugikan Bank dan/atau menyebabkan Bank melanggar prinsip kehati-hatian, selama menjabat sebagai anggota Direksi

8. Anggota Direksi dilarang merangkap jabatan pada jabatan lain yang berpotensi benturan kepentingan dan jabatan lain sesuai ketentuan perundang-undangan.
 9. Anggota Direksi baik secara sendiri-sendiri maupun bersama-sama dilarang memiliki saham pada perusahaan lain 25% (dua puluh lima persen) atau lebih dari modal disetor perusahaan lain dimaksud.
 10. Dalam hal direktur yang membawahkan Fungsi Kepatuhan berhalangan sementara sehingga tidak dapat menjalankan tugas jabatannya selama lebih dari 7 (tujuh) hari kerja berturut-turut, pelaksanaan tugas yang bersangkutan wajib digantikan sementara oleh direktur lain sampai dengan direktur yang membawahkan Fungsi Kepatuhan dapat menjalankan tugas jabatannya kembali dan wajib dilaporkan kepada OJK sesuai ketentuan yang berlaku.
 11. Dalam hal direktur yang membawahkan Fungsi Kepatuhan berhalangan tetap, mengundurkan diri, atau habis masa jabatannya, Bank wajib segera mengangkat pengganti direktur yang membawahkan Fungsi Kepatuhan, paling lama 6 (enam) bulan setelah direktur yang membawahkan Fungsi Kepatuhan berhalangan tetap, mengundurkan diri, atau habis masa jabatannya.
 12. Selama dalam proses penggantian direktur yang membawahkan Fungsi Kepatuhan, Bank wajib menunjuk atau menugaskan salah satu direktur lainnya untuk sementara melaksanakan tugas direktur yang membawahkan Fungsi Kepatuhan.
 13. Penggantian sementara jabatan direktur yang membawahkan Fungsi Kepatuhan wajib dilaporkan kepada Otoritas Jasa Keuangan.
 14. Etika kerja Direksi juga berpedoman kepada Kebijakan Kode Etik Bank.
 15. Direksi dilarang memberikan kuasa umum kepada pihak lain yang mengakibatkan pengalihan tugas dan fungsi Direksi sebagaimana diatur dalam POJK Tata Kelola Bank Umum. Yang dimaksud dengan pemberian kuasa umum adalah pemberian kuasa kepada 1 (satu) orang karyawan atau lebih atau orang lain yang mengakibatkan pengalihan tugas, wewenang, dan tanggung jawab Direksi secara menyeluruh yaitu tanpa batasan ruang lingkup dan waktu.
 16. Tidak termasuk rangkap jabatan dalam hal anggota Direksi: 1) bertanggung jawab terhadap pengawasan atas penyertaan Bank pada perusahaan anak, menjalankan tugas fungsional menjadi anggota Dewan Komisaris pada perusahaan anak bukan bank yang dikendalikan oleh Bank; 2) bertanggung jawab terhadap pengawasan dana pensiun atau menjalankan tugas sebagai dewan pengawas dana pensiun, yang dimiliki oleh Bank; 3) melaksanakan tugas sebagai direktur pengganti;
- required to make a statement to: maintain integrity, avoid all forms of conflict of interest, and avoid actions that may harm the Bank and/or cause the Bank to violate the principle of prudence, during their term as members of the Board of Directors.*
 - 8. Members of the Board of Directors are prohibited from holding other positions that could potentially lead to conflicts of interest and other positions in accordance with laws and regulations.*
 - 9. Members of the Board of Directors, both individually and jointly, are prohibited from owning shares of more than 25% of the paid-up capital in other companies.*
 - 10. In the event that the Director in charge of the Compliance Function is temporarily unavailable and therefore unable to carry out duties for more than 7 consecutive working days, the concerned duties implementation must be replaced temporarily by another Director until the Director in charge of Compliance Function can resume his/her duties. This must be reported to the Financial Services Authority in accordance with applicable regulations.*
 - 11. In the event that the Director overseeing the Compliance Function is permanently unable to perform his/her duties, resigns, or his/her term of office expires, the Bank must immediately appoint a replacement, no later than 6 months after the individual is permanently unable to perform his/her duties, resigns, or his/her term of office expires.*
 - 12. During the process of replacing the Director overseeing the Compliance Function, the Bank must appoint or assign another Director to temporarily perform the duties of the Director overseeing the Compliance Function.*
 - 13. The temporary replacement of the position of the Director overseeing the Compliance Function must be reported to the Financial Services Authority.*
 - 14. The Board of Directors' work ethics are also guided by the Bank's Code of Conduct Policy*
 - 15. The Board of Directors is prohibited from giving general power of attorney to other parties, which results in the transfer of duties and functions of the Board of Directors as stipulated in the Financial Services Authority Regulation on Corporate Governance for Commercial Banks. Granting of a general power of attorney means granting power of attorney to 1 employee or more or another person, which results in the transfer of the Board of Directors' duties, authorities, and responsibilities without limitation of scope and time.*
 - 16. These are not considered as serving concurrent positions: 1) Responsible for overseeing the Bank's investments in subsidiaries, performing functional duties as members of the Board of Commissioners in non-bank Subsidiaries controlled by the Bank; 2) Responsible for overseeing the pension fund or performing duties as the supervisory board of the pension fund, which is owned by the Bank; 3) Carrying out duties as an acting director; and/or 4) Holding positions in non-profit organizations*

dan/atau 4) menduduki jabatan pada organisasi atau lembaga nirlaba, sepanjang tidak mengakibatkan yang bersangkutan mengabaikan pelaksanaan tugas dan tanggung jawab sebagai anggota Direksi.

17. Terkait Pelaksanaan Fungsi Kepatuhan Bank Umum
- a. Tugas dan tanggung jawab direktur yang membawahkan Fungsi Kepatuhan, wajib paling sedikit:
- Merumuskan strategi guna mendorong terciptanya Budaya Kepatuhan Bank;
 - Mengusulkan kebijakan kepatuhan atau prinsip prinsip kepatuhan yang akan ditetapkan oleh Direksi;
 - Menetapkan sistem dan prosedur kepatuhan yang digunakan untuk menyusun ketentuan dan pedoman internal Bank;
 - Memastikan bahwa seluruh kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan, termasuk Prinsip Syariah bagi bank umum syariah dan unit usaha syariah
 - Meminimalkan Risiko Kepatuhan Bank
 - Melakukan tindakan pencegahan agar kebijakan dan/atau keputusan yang diambil Direksi Bank atau pimpinan kantor cabang dari bank yang berkedudukan di luar negeri tidak menyimpang dari ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan
- b. Tugas dan tanggung jawab tidak menghilangkan hak dan kewajiban direktur yang membawahkan Fungsi Kepatuhan sebagai anggota Direksi Bank, dalam hal diperlukan keputusan terhadap perbuatan tertentu dari seluruh anggota Direksi Bank
18. Calon anggota Direksi yang telah mengikuti penilaian kemampuan dan kepatutan dan telah mendapat persetujuan dari OJK, dilakukan pengangkatan oleh RUPS paling lama 6 (enam) bulan setelah diperoleh persetujuan OJK
- a. Apabila melewati batas waktu yang telah ditentukan, maka persetujuan OJK menjadi tidak berlaku.
19. Dalam hal terdapat anggota Direksi diberhentikan, mengundurkan diri, atau meninggal dunia, Bank BHI wajib menginformasikan kepada OJK paling lama 10 (sepuluh) hari kerja sejak tanggal surat pemberhentian, pengunduran diri, atau dinyatakan meninggal dunia.

Waktu Kerja

Waktu kerja Direksi sebagaimana diatur dalam Pedoman dan Tata Tertib Kerja Direksi adalah sebagai berikut:

1. Waktu kerja adalah waktu yang ditetapkan oleh Bank kepada anggota Direksi untuk hadir di tempat kerja untuk melaksanakan tugas pengurusan Bank.

or institutions, as long as it does not result in neglecting the execution of duties and responsibilities as a member of the Board of Directors.

17. Regarding the Implementation of the Compliance Function of General Banks
- a. The duties and responsibilities of the director in charge of the Compliance Function must at least:
- Formulate strategies in order to create the Bank's Compliance Culture;
 - Propose compliance policies or compliance principles to be determined by the Board of Directors;
 - Determine the compliance system and procedures used to prepare the Bank's internal provisions and guidelines
 - Ensure that all policies, provisions, systems, and procedures, as well as business activities carried out by the Bank are in accordance with the provisions of the Financial Services Authority and the provisions of laws and regulations, including the Sharia Principles for Islamic general banks and Islamic business units
 - Minimize Bank Compliance Risk
 - Take preventive measures so that policies and/or decisions taken by the Bank's Board of Directors or branch office managers of banks domiciled abroad do not deviate from the provisions of the Financial Services Authority and the provisions of laws and regulations
- b. Duties and responsibilities do not eliminate the rights and obligations of the director who is in charge of the Compliance Function as a member of the Bank's Board of Directors, in the event that a decision is required regarding certain actions of all members of the Bank's Board of Directors
18. Prospective members of the Board of Directors who have undergone a fit and proper assessment and have received approval from the OJK, shall be appointed by the GMS no later than 6 months after obtaining OJK approval
- a. If the specified time limit has been exceeded, the OJK approval shall be invalid.
19. In the event that a member of the Board of Directors is dismissed, resigns, or dies, Bank BHI is required to inform the OJK no later than 10 working days from the date of the letter of dismissal, resignation, or being declared dead.

Working Hours

The working hours of the Board of Directors outlined in the Board Manual of the Board of Directors of Bank Sahabat Sampoerna are as follows.

1. Working hours are the time determined by the Bank for members of the Board of Directors to be present at the workplace to carry out Bank management duties.

2. Anggota Direksi dapat berada di luar kantor-kantor Bank dalam rangka kedinasan. Dalam hal perjalanan dinas, seluruh anggota Direksi secara bersamaan tidak dapat berada di dalam satu moda transportasi (khususnya pesawat).
 3. Waktu kerja anggota Direksi adalah 5 hari kerja dalam seminggu. Apabila diperlukan, anggota Direksi dapat hadir di tempat kerja di luar waktu kerja Bank karena adanya hal yang penting dan mendesak.
2. *Members of the Board of Directors may be outside the Bank's offices for official duties. In terms of official travel, all members of the Board of Directors cannot be in one mode of transportation (especially airplanes) at the same time.*
 3. *The Board of Directors members work 5 working days a week. If necessary, members of the Board of Directors may be present at the workplace outside of the Bank's working hours due to important and urgent matters.*

Pelaksanaan Rapat Internal Direksi

Sebagaimana diatur dalam Pedoman dan Tata Tertib Kerja, Direksi wajib menyelenggarakan rapat internal secara berkala paling sedikit 1 (satu) kali setiap bulan. Sepanjang tahun 2024, Direksi telah menyelenggarakan rapat internal sebanyak 49 kali, baik secara daring maupun luring. Adapun frekuensi kehadiran Direksi dan agenda rapat internal Direksi disampaikan sebagai berikut:

Board of Directors' Internal Meeting

The Board of Directors is required to hold regular internal meetings at least once a month. Throughout 2024, the Board of Directors held a total of 49 meetings, both online and offline, with details of the attendance as follows.

Nama Name	Jabatan Position	Total Rapat Total Meetings	Kehadiran Attendance	Persentase Percentage (%)
Ali Rukmijah	Direktur Utama President Director	49	43	88%
Henky Suryaputra	Direktur Keuangan & Perencanaan Bisnis Finance & Business Planning Director	49	44	90%
Hendra Rahardja	Direktur Teknologi Informasi Information Technology Director	49	41	84%
Rudy Mahasin	Direktur Bisnis UMKM ESME Business Director	49	44	90%
A. Dendi Hardiansyah	Direktur Kepatuhan & Manajemen Risiko Compliance & Risk Director	49	46	94%
Rata-Rata Average				89%

Dalam pelaksanaan rapat internal Direksi tersebut, turut dihadiri oleh Jajaran Manajemen Bank, yaitu:

1. Chief Operations Officer
2. Chief Credit Officer
3. Chief Human Capital Officer
4. Chief Digital Business
5. Chief Internal Auditor
6. Senior Management Team

The internal meetings of the Board of Directors were attended by the following members of the Bank's Management:

1. *Chief Operations Officer*
2. *Chief Credit Officer*
3. *Chief Human Capital Officer*
4. *Chief Digital Business*
5. *Chief Internal Auditor*
6. *Senior Management Team*

No	Tanggal Date	Agenda Agenda	Kehadiran Attendance				
			AR	HS	HR	RM	ADH
1	8 Januari January 8	<ul style="list-style-type: none"> • Follow Up Items & Reminder Rapat BoM-SMT 27 Desember 2023 • Pengesahan Notulen Rapat BoM-SMT 27 Desember 2023 • BiWeekly Portfolio Update • Managing Funding Tabel Rate On Core Banking System • Follow Up Items & Reminder BoM-SMT Meeting December 27, 2023 • Ratification of BoM-SMT Meeting Minutes December 27, 2023 • BiWeekly Portfolio Update • Managing Funding Core Banking System Rate Table 	v	v	v	v	v

No	Tanggal Date	Agenda Agenda	Kehadiran Attendance				
			AR	HS	HR	RM	ADH
2	15 Januari January 15	<ul style="list-style-type: none"> Follow Up Items & Reminder Rapat BoM-SMT 8 Januari 2024 Pengesahan Notulen Rapat BoM-SMT 8 Januari 2024 Pelaksanaan Pengawasan Kepatuhan UKK APU PPT & PPPSPM BSS Financial December 2023 Update Pemanfaatan Aktiva Tetap Bank di Kota Malang Produktifitas Branch Service Officer Follow Up Items & Reminder BoM-SMT Meeting January 8, 2024 Ratification of BoM-SMT Meeting Minutes January 8, 2024 Implementation of UKK APU PPT & PPPSPM Compliance Supervision BSS Financial December 2023 Update Utilization of Bank Fixed Assets in Malang City Branch Service Officer Productivity 	v	v	v	v	v
3	22 Januari January 22	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 15 Januari 2024 Pengesahan Notulen Rapat BoM 15 Januari 2024 BiWeekly Portfolio Update RBB Realization Q4 2023 Update Project Personal Data Protection Follow-Up Items & Reminder BoM Meeting January 15, 2024 Ratification of BoM Meeting Minutes January 15, 2024 BiWeekly Portfolio Update RBB Realization Q4 2023 Update Personal Data Protection Project 	v	v	v	v	v
4	29 Januari January 29	<ul style="list-style-type: none"> Follow Up Items & Reminder Rapat BoM-SMT 22 Januari 2024 Pengesahan Notulen Rapat BoM-SMT 22 Januari 2024 Cyber Security Update Rencana Pembelian Gedung Untuk Cabang Medan & Palembang Payment Service Solution Follow Up Items & Reminder BoM-SMT Meeting January 22, 2024 Approval of BoM-SMT Meeting Minutes January 22, 2024 Cyber Security Update Building Purchase Plan for Medan & Palembang Branches Payment Service Solution 	v	v	v	v	v
5	5 Februari February 5	<ul style="list-style-type: none"> Follow Up Items & Reminder Rapat BoM 29 Januari 2024 Pengesahan Notulen Rapat BoM 29 Januari 2024 BiWeekly Portfolio Update Follow Up Items & Reminder BoM Meeting January 29, 2024 Approval of BoM Meeting Minutes January 29, 2024 BiWeekly Portfolio Update 	v	v	v	v	v
6	12 Februari February 12	<ul style="list-style-type: none"> Follow Up Items & Reminder Rapat BoM-SMT 5 Februari 2024 Pengesahan Notulen Rapat BoM-SMT 5 Februari 2024 BoM Strategic Discussion Follow Up Items & Reminder BoM-SMT Meeting February 5, 2024 Approval of BoM-SMT Meeting Minutes February 5, 2024 BoM Strategic Discussion 	v	v	v	x	v
7	19 Februari February 19	<ul style="list-style-type: none"> Follow Up Items & Reminder Rapat BoM 12 Februari 2024 Pengesahan Notulen Rapat BoM 12 Februari 2024 BiWeekly Portfolio Update BSS Financial January 2024 Update Follow Up Items & Reminder BoM Meeting February 12, 2024 Approval of BoM Meeting Minutes February 12, 2024 BiWeekly Portfolio Update BSS Financial January 2024 Update 	v	v	v	v	v
8	26 Februari February 26	<ul style="list-style-type: none"> Follow Up Items & Reminder Rapat BoM-SMT 19 Februari 2024 Pengesahan Notulen Rapat BoM-SMT 19 Februari 2024 Roadmap S.A.F.E (Sampoerna Anti Fraud Ecosystem) 2024 L360 Survey Result 2024 Update Follow Up Items & Reminder BoM-SMT Meeting February 19, 2024 Approval of BoM-SMT Meeting Minutes February 19, 2024 S.A.F.E (Sampoerna Anti Fraud Ecosystem) Roadmap 2024 L360 Survey Results 2024 Update 	v	v	v	v	v
9	4 Maret March 4	<ul style="list-style-type: none"> Follow Up Items & Reminder Rapat BoM 26 Februari 2024 Pengesahan Notulen Rapat BoM 26 Februari 2024 BiWeekly Portfolio Update Follow Up Items & Reminder BoM Meeting February 26, 2024 Approval of BoM Meeting Minutes February 26, 2024 BiWeekly Portfolio Update 	x	v	v	v	v

No	Tanggal Date	Agenda Agenda	Kehadiran Attendance				
			AR	HS	HR	RM	ADH
10	13 Maret March 13	<ul style="list-style-type: none"> Follow Up Items & Reminder Rapat BoM-SMT 4 Maret 2024 Pengesahan Notulen Rapat BoM-SMT 4 Maret 2024 BoM Strategic Discussion Follow Up Items & Reminder BoM-SMT Meeting March 4, 2024 Approval of BoM-SMT Meeting Minutes March 4, 2024 BoM Strategic Discussion 	v	v	v	v	v
11	18 Maret March 18	<ul style="list-style-type: none"> Follow Up Items & Reminder Rapat BoM 13 Maret 2024 Pengesahan Notulen Rapat BoM 13 Maret 2024 BiWeekly Portfolio Update BSS Financial Februari 2024 Penerapan Program APU PPT & PPPSPM Update Follow Up Items & Reminder BoM Meeting March 13, 2024 Approval of BoM Meeting Minutes March 13, 2024 BiWeekly Portfolio Update BSS Financial February 2024 Implementation of APU PPT & PPPSPM Program Update 	v	v	v	v	v
12	27 Maret March 27	<ul style="list-style-type: none"> Follow Up Items & Reminder Rapat BoM-SMT 18 Maret 2024 Pengesahan Notulen Rapat BoM-SMT 18 Maret 2024 OP Generator & eRequest Project Update Follow Up Items & Reminder BoM-SMT Meeting 18 March 2024 Approval of Meeting Minutes BoM-SMT March 18, 2024 OP Generator & eRequest Project Update 	v	v	v	x	v
13	1 April April 1	<ul style="list-style-type: none"> Follow Up Items & Reminder Rapat BoM 27 Maret 2024 Pengesahan Notulen Rapat BoM 27 Maret 2024 BiWeekly Portfolio Update Follow Up Items & Reminder BoM Meeting March 27, 2024 Approval of BoM Meeting Minutes March 27, 2024 BiWeekly Portfolio Update 	v	v	v	v	v
14	17 April April 17	<ul style="list-style-type: none"> Follow Up Items & Reminder Rapat BoM 01 April 2024 Pengesahan Notulen Rapat BoM 01 April 2024 BiWeekly Portfolio Update Follow Up Items & Reminder BoM Meeting April 01, 2024 Approval of BoM Meeting Minutes April 01, 2024 BiWeekly Portfolio Update 	v	v	v	v	x
15	22 April April 22	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 17 April 2024 Pengesahan Notulen Rapat BoM-SMT 17 April 2024 BoM Strategic Discussion Follow-Up Items & Reminders for BoM-SMT Meeting 17 April, 2024 Ratification of the BoM-SMT Meeting Minutes April 17, 2024 BoM Strategic Discussion 	v	v	v	v	v
16	29 April April 29	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 22 April 2024 Pengesahan Notulen Rapat BoM 22 April 2024 APU PPT & PPPSPM Update BiWeekly Portfolio Update RBB Realization Q1 2024 Update GA Infrastructure Progress Update Follow-Up Items & Reminders for BoM Meeting April 22, 2024 Ratification of BoM Meeting Minutes April 22, 2024 APU PPT & PPPSPM Update BiWeekly Portfolio Update RBB Realization Q1 2024 Update GA Infrastructure Progress Update 	v	x	v	v	v
17	6 Mei May 6	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 29 April 2024 Pengesahan Notulen Rapat BoM-SMT 29 April 2024 BoM Strategic Discussion Follow-Up Items & Reminders for BoM-SMT Meeting April 29, 2024 Ratification of the BoM-SMT Meeting Minutes April 29, 2024 BoM Strategic Discussion 	v	v	v	v	v

No	Tanggal Date	Agenda Agenda	Kehadiran Attendance				
			AR	HS	HR	RM	ADH
18	13 Mei May 13	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 6 Mei 2024 Pengesahan Notulen Rapat BoM 6 Mei 2024 BiWeekly Portfolio Update BSS Financial April 2024 Update & PL by Business IBB Transaction & Time Deposits Dashboard Update Google Workspace Roll Out Update Awareness APK Penipuan dan Modus Operandinya Credit Administration Control Project Update Follow-Up Items & Reminders for BoM Meeting May 6, 2024 Approval of BoM Meeting Minutes May 6, 2024 BiWeekly Portfolio Update BSS Financial April 2024 Update & PL by Business IBB Transaction & Time Deposits Dashboard Update Google Workspace Roll Out Update Awareness APK Fraud and Its Modus Operandi Credit Administration Control Project Update 	v	v	v	v	v
19	20 Mei May 20	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 13 Mei 2024 Pengesahan Notulen Rapat BoM-SMT 13 Mei 2024 DFC Term & Condition Fulfilment Update BoM Strategic Discussion Follow-Up Items & Reminder BoM-SMT Meeting May 13, 2024 Approval of BoM-SMT Meeting Minutes May 13, 2024 DFC Term & Condition Fulfilment Update BoM Strategic Discussion 	v	v	v	v	v
20	29 Mei May 29	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 20 Mei 2024 Pengesahan Notulen Rapat BoM 20 Mei 2024 APU PPT & PPPSPM Update BiWeekly Portfolio Update Follow-Up Items & Reminder BoM Meeting May 20, 2024 Approval of BoM Meeting Minutes May 20, 2024 APU PPT & PPPSPM Update BiWeekly Portfolio Update 	v	v	v	v	v
21	3 Juni June 3	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 29 Mei 2024 Pengesahan Notulen Rapat BoM-SMT 29 Mei 2024 BoM Strategic Discussion Follow-Up Items & Reminder BoM-SMT Meeting May 29, 2024 Approval of BoM-SMT Meeting Minutes May 29, 2024 BoM Strategic Discussion 	v	v	v	v	v
22	10 Juni June 10	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 3 Juni 2024 Pengesahan Notulen Rapat BoM 3 Juni 2024 BiWeekly Portfolio Update Follow-Up Items & Reminder BoM Meeting June 3, 2024 Approval of Meeting Minutes BoM June 3, 2024 BiWeekly Portfolio Update 	v	x	v	v	v
23	19 Juni June 19	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 10 Juni 2024 Pengesahan Notulen Rapat BoM-SMT 10 Juni 2024 BSS Financial May 2024 Update Follow-Up Items & Reminder BoM-SMT Meeting June 10, 2024 Approval of BoM-SMT Meeting Minutes June 10, 2024 BSS Financial May 2024 Update 	x	x	x	v	v
24	24 Juni June 24	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 19 Juni 2024 Pengesahan Notulen Rapat BoM 19 Juni 2024 BiWeekly Portfolio Update Project Steering Committee – Perlindungan Data Pribadi Update Follow-Up Items & Reminder BoM Meeting June 19, 2024 Approval of BoM Meeting Minutes June 19, 2024 BiWeekly Portfolio Update Project Steering Committee – Personal Data Protection Update 	v	v	x	v	v
25	1 Juli July 1	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 24 Juni 2024 Pengesahan Notulen Rapat BoM-SMT 24 Juni 2024 Penyegaran Tampilan Booth ATM Update BoM Strategic Discussion Follow-Up Items & Reminder BoM-SMT Meeting June 24, 2024 Approval of BoM-SMT Meeting Minutes June 24, 2024 Refreshed ATM Booth Display Update BoM Strategic Discussion 	v	v	x	v	v

No	Tanggal Date	Agenda Agenda	Kehadiran Attendance				
			AR	HS	HR	RM	ADH
26	8 Juli July 8	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 1 Juli 2024 Pengesahan Notulen Rapat BoM 1 Juli 2024 BiWeekly Portfolio Update Implikasi Sampoerna Credit Unity Update Follow-Up Items & Reminder BoM Meeting July 1, 2024 Approval of BoM Meeting Minutes July 1, 2024 BiWeekly Portfolio Update Implications of Sampoerna Credit Unity Update 	v	v	x	x	v
27	15 Juli July 15	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 8 Juli 2024 Pengesahan Notulen Rapat BoM-SMT 8 Juli 2024 BSS Financial June 2024 Update Follow-Up Items & Reminder BoM-SMT Meeting July 8, 2024 Approval of BoM-SMT Meeting Minutes July 8, 2024 BSS Financial June 2024 Update 	x	v	v	v	v
28	22 Juli July 22	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 15 Juli 2024 Pengesahan Notulen Rapat BoM 15 Juli 2024 BiWeekly Portfolio Update Follow-Up Items & Reminder BoM Meeting July 15, 2024 Approval of BoM Meeting Minutes July 15, 2024 BiWeekly Portfolio Update 	x	v	v	v	v
29	29 Juli July 29	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 22 Juli 2024 Pengesahan Notulen Rapat BoM -SMT 22 Juli 2024 RBB Q2 2024 Realization Update Booth ATM Design Progress Update Follow-Up Items & Reminder BoM-SMT Meeting July 22, 2024 Approval of BoM -SMT Meeting Minutes July 22, 2024 RBB Q2 2024 Realization Update Booth ATM Design Progress Update 	v	v	v	v	v
30	5 Agustus August 5	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 29 Juli 2024 Pengesahan Notulen Rapat BoM 29 Juli 2024 BiWeekly Portfolio Update Stanford Training Summary HC Update Google Workspace Migration Process Update Follow-Up Items & Reminder BoM Meeting July 29, 2024 Approval of BoM Meeting Minutes July 29, 2024 BiWeekly Portfolio Update Stanford Training Summary HC Update Google Workspace Migration Process Update 	v	v	v	v	v
31	12 Agustus August 12	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 5 Agustus 2024 Pengesahan Notulen Rapat BoM-SMT 5 Agustus 2024 BSS Financial July 2024 Follow-Up Items & Reminder BoM-SMT Meeting August 5, 2024 Approval of BoM-SMT Meeting Minutes August 5, 2024 BSS Financial July 2024 	v	v	v	v	v
32	19 Agustus August 19	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 12 Agustus 2024 Pengesahan Notulen Rapat BoM 12 Agustus 2024 BiWeekly Portfolio Update Follow-Up Items & Reminder BoM Meeting August 12, 2024 Approval of BoM Meeting Minutes August 12, 2024 BiWeekly Portfolio Update 	v	v	v	v	v
33	26 Agustus August 26	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 19 Agustus 2024 Pengesahan Notulen Rapat BoM-SMT 19 Agustus 2024 Self-Assessment Pelindungan Konsumen Follow-Up Items & Reminder BoM-SMT Meeting August 19, 2024 Ratification of BoM-SMT Meeting Minutes 19 August 2024 Consumer Protection Self-Assessment 	v	v	v	v	v
34	2 September September 2	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 26 Agustus 2024 Pengesahan Notulen Rapat BoM 26 Agustus 2024 BiWeekly Portfolio Update Data Quality Dashboard Update BSS AI Roadmap Update Follow-Up Items & Reminder BoM Meeting August 26, 2024 Approval of BoM Meeting Minutes August 26, 2024 BiWeekly Portfolio Update Data Quality Dashboard Update BSS AI Roadmap Update 	v	v	v	v	x

No	Tanggal Date	Agenda Agenda	Kehadiran Attendance				
			AR	HS	HR	RM	ADH
35	9 September September 9	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 2 September 2024 Pengesahan Notulen Rapat BoM-SMT 2 September 2024 Building Renovation Update AYDA Policy Update Follow-Up Items & Reminder BoM-SMT Meeting September 2, 2024 Approval of BoM-SMT Meeting Minutes September 2, 2024 Building Renovation Update AYDA Policy Update 	v	v	v	v	x
36	18 September September 18	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 9 September 2024 Pengesahan Notulen Rapat BoM 9 September 2024 BiWeekly Lending & Funding Portfolio Update BSS Financial August 2024 Update Self-Assessment Pelindungan Konsumen Update Follow-Up Items & Reminder BoM Meeting September 9, 2024 Approval of BoM Meeting Minutes September 9, 2024 BiWeekly Lending & Funding Portfolio Update BSS Financial August 2024 Update Consumer Protection Self-Assessment Update 	v	v	x	x	v
37	23 September September 23	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 18 September 2024 Pengesahan Notulen Rapat BoM-SMT 18 September 2024 IT Infrastructure & Security Update Follow-Up Items & Reminder BoM-SMT Meeting September 18, 2024 Approval of BoM-SMT Meeting Minutes September 18, 2024 IT Infrastructure & Security Update 	v	v	v	v	v
38	30 September September 30	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 23 September 2024 Pengesahan Notulen Rapat BoM 23 September 2024 BiWeekly Funding & Lending Portfolio Report Annual Regular Audit OJK, DPS & SBY Branch Update Follow-Up Items & Reminder BoM Meeting September 23, 2024 Approval of BoM Meeting Minutes September 23, 2024 BiWeekly Funding & Lending Portfolio Report Annual Regular Audit OJK, DPS & SBY Branch Update 	v	v	x	v	v
39	14 Oktober October 14	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 30 September 2024 Pengesahan Notulen Rapat BoM-SMT 30 September 2024 BiWeekly Lending & Funding Portfolio Update BSS Financial September 2024 Update & PL by Business Project Deliverables Pelindungan Data Pribadi (PDP) Follow-Up Items & Reminder BoM-SMT Meeting September 30, 2024 Approval of BoM-SMT Meeting Minutes September 30, 2024 BiWeekly Lending & Funding Portfolio Update BSS Financial September 2024 Update & PL by Business Personal Data Protection Project Deliverables (PDP) 	v	v	v	v	v
40	21 Oktober October 21	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 14 Oktober 2024 Pengesahan Notulen Rapat BoM-SMT 14 Oktober 2024 RBB Realization Q3 2024 Update Pelaksanaan Self Assessment Pelindungan Konsumen Update Follow-Up Items & Reminder BoM-SMT Meeting October 14, 2024 Approval of BoM-SMT Meeting Minutes October 14, 2024 RBB Realization Q3 2024 Update Implementation of Consumer Protection Self Assessment Update 	v	v	v	v	v
41	28 Oktober October 28	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 21 Oktober 2024 Pengesahan Notulen Rapat BoM 21 Oktober 2024 BiWeekly Lending & Funding Portfolio Update Data Loss Prevention Enforcement Plan Update Follow-Up Items & Reminder BoM Meeting October 21, 2024 Approval of BoM Meeting Minutes October 21, 2024 BiWeekly Lending & Funding Portfolio Update Data Loss Prevention Enforcement Plan Update 	v	v	v	v	v
42	4 November November 4	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 28 Oktober 2024 Pengesahan Notulen Rapat BoM-SMT 28 Oktober 2024 Presentasi Summary Report Engagement Survey oleh PT. Mercer Follow-Up Items & Reminder BoM-SMT Meeting October 28, 2024 Ratification of BoM-SMT Meeting Minutes October 28, 2024 Presentation of Summary Report Engagement Survey by PT. Mercer 	v	v	v	v	v

No	Tanggal Date	Agenda Agenda	Kehadiran Attendance				
			AR	HS	HR	RM	ADH
43	11 November November 11	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 4 November 2024 Pengesahan Notulen Rapat BoM 4 November 2024 BiWeekly Portfolio Lending & Funding Update Funding Business Activities & Initiatives Rencana Aksi Keuangan Berkelanjutan (RKAB) Follow-Up Items & Reminder BoM Meeting November 4, 2024 Approval of BoM Meeting Minutes November 4, 2024 BiWeekly Portfolio Lending & Funding Update Funding Business Activities & Initiatives Sustainable Finance Action Plan (RKAB) 	v	v	v	v	v
44	18 November November 18	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 11 November 2024 Pengesahan Notulen Rapat BoM-SMT 11 November 2024 BSS Financial Update October 2024 Banccasurance Business Partners Update Follow-Up Items & Reminder BoM-SMT Meeting November 11, 2024 Approval of BoM-SMT Meeting Minutes November 11, 2024 BSS Financial Update October 2024 Banccasurance Business Partners Update 	v	v	v	v	v
45	25 November November 25	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 18 November 2024 Pengesahan Notulen Rapat BoM 18 November 2024 BiWeekly Lending & Funding Portfolio Update Funding Business Activities & Initiatives Update Follow-Up Items & Reminder BoM Meeting November 18, 2024 Approval of BoM Meeting Minutes November 18, 2024 BiWeekly Lending & Funding Portfolio Update Funding Business Activities & Initiatives Update 	v	v	v	v	v
46	2 Desember December 2	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 25 November 2024 Pengesahan Notulen Rapat BoM 25 November 2024 BoM Strategic Discussion Follow-Up Items & Reminder BoM-SMT Meeting November 25, 2024 Approval of BoM Meeting Minutes November 25, 2024 BoM Strategic Discussion 	v	v	v	v	v
47	17 Desember December 17	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 2 Desember 2024 Pengesahan Notulen Rapat BoM 2 Desember 2024 BSS Financials Update November 2024 Follow-Up Items & Reminder BoM Meeting December 2, 2024 Approval of BoM Meeting Minutes December 2, 2024 BSS Financials Update November 2024 	v	v	x	v	v
48	23 Desember December 23	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM 17 Desember 2024 Pengesahan Notulen Rapat BoM 17 Desember 2024 BiWeekly Lending & Funding Portfolio Update Funding Business Activities & Initiatives Update Follow-Up Items & Reminder BoM Meeting December 17, 2024 Approval of BoM Meeting Minutes December 17, 2024 BiWeekly Lending & Funding Portfolio Update Funding Business Activities & Initiatives Update 	x	x	x	x	v
49	30 Desember December 30	<ul style="list-style-type: none"> Follow-Up Items & Reminder Rapat BoM-SMT 23 Desember 2024 Pengesahan Notulen Rapat BoM-SMT 23 Desember 2024 BoM Strategic Discussion Follow-Up Items & Reminder BoM-SMT Meeting December 23, 2024 Approval of BoM Meeting Minutes BoM-SMT Meeting December 23, 2024 BoM Strategic Discussion 	x	x			
Jumlah Kehadiran Total Attendance			43	44	41	44	46

Keterangan | Remarks
AR : Ali Rukmijah
HS : Henky Suryaputra
HR : Hendra Rahardja
RM : Rudy Mahasin
ADH : A. Dendi Hardiansyah

Kepemilikan Saham

Sampai dengan 31 Desember 2024, seluruh anggota Direksi Bank Sahabat Sampoerna tidak memiliki saham di dalam Bank ataupun di perusahaan lain di atas 5%. Informasi tentang Kepemilikan Saham Direksi telah diungkapkan pada Bab Profil Perusahaan dalam Laporan Tahunan ini.

Hubungan Afiliasi

Berikut disampaikan informasi terkait hubungan afiliasi antara Direksi dengan Direksi lainnya, Dewan Komisaris, serta Pemegang Saham Pengendali.

Nama Name	Dewan Komisaris Board of Commissioner	Direksi Board of Director	Pemegang Saham Pengendali Controlling Shareholders	Keterangan Descriptions
Ali Rukmijah	x	x	x	-
Henky Suryaputra	x	x	x	-
Hendra Rahardja	x	x	x	-
Rudy Mahasin	x	x	x	-
A. Dendi Hardiansyah	x	x	x	-

Keterangan | Remarks:
v: Ada | Yes
x: Tidak ada | No

Rangkap Jabatan

Kebijakan rangkap jabatan Direksi telah tercantum pada Etika Kerja dalam Pedoman dan Tata Tertib Kerja Direksi. Kebijakan tersebut telah dipenuhi oleh seluruh anggota Direksi. Adapun pengungkapan rangkap jabatan masing-masing anggota Direksi hingga akhir tahun 2024 adalah sebagai berikut:

Nama Name	Jabatan di Bank Sahabat Sampoerna Position at Bank Sahabat Sampoerna	Perusahaan/Instansi Lain Other Company/Institution	
		Nama Perusahaan Company Name	Jabatan Position
Ali Rukmijah	Direktur Utama President Director	Nihil None	Nihil None
Henky Suryaputra	Direktur Keuangan & Perencanaan Bisnis Finance & Business Planning Director	Nihil None	Nihil None
Hendra Rahardja	Direktur Teknologi Informasi Information Technology Director	Nihil None	Nihil None
Rudy Mahasin	Direktur Bisnis UMKM ESME Business Director	Nihil None	Nihil None
A. Dendi Hardiansyah	Direktur Kepatuhan & Manajemen Risiko Compliance & Risk Director	Nihil None	Nihil None

Share Ownership

As of December 31, 2024, all members of the Board of Directors of Bank Sahabat Sampoerna do not own shares in the Bank or in other companies above 5%. Information on the Board of Directors' Share Ownership has been disclosed in the Company Profile Chapter in this Annual Report.

Affiliated Relationships

The following is information regarding the affiliated relationships between the Board of Directors and other Directors, the Board of Commissioners, and Controlling Shareholders.

Concurrent Positions

The policy of dual positions of the Board of Directors has been stated in the Work Ethics in the Guidelines and Work Regulations of the Board of Directors. The policy has been complied with by all members of the Board of Directors. The disclosure of dual positions of each member of the Board of Directors until the end of 2024 is as follows:

Kebijakan Keberagaman Komposisi

Sampai dengan 31 Desember 2024, Bank Sahabat Sampoerna belum menyusun dan menetapkan kebijakan terkait keberagaman komposisi Direksi. Namun, komposisi anggota Direksi telah disusun sedemikian rupa untuk memungkinkan pengambilan keputusan dapat dilakukan secara efektif, tepat, dan cepat dengan tetap mematuhi ketentuan perundang-undangan yang berlaku dengan memperhatikan aspek keberagaman.

Composition Diversity Policy

As of 31 December 2024, Bank Sahabat Sampoerna has not yet prepared and established a policy regarding the diversity of the composition of the Board of Directors. However, the composition of the members of the Board of Directors has been arranged in such a way as to enable decision-making to be carried out effectively, accurately, and quickly while still complying with the provisions of applicable laws and regulations by considering the diversity aspect.

Aspek Keberagaman <i>Diversity Aspect</i>	Penjelasan <i>Explanation</i>
Pendidikan <i>Education</i>	Latar belakang pendidikan Direksi beragam, mulai dari sarjana sampai magister, dengan kompetensi di bidang Teknik Mesin, Teknik Industri, Akuntansi dan Keuangan, Bisnis Administrasi, Komputer, serta Ekonomi dan Hukum Bisnis. <i>The educational background of the Board of Directors varies from bachelor's degree to master's, with competencies in Mechanical Engineering, Industrial Engineering, Accounting and Finance, Business Administration, Computer, and Economics and Business Law.</i>
Pengalaman Kerja <i>Work Experience</i>	Keberagaman pengalaman kerja Direksi antara lain berasal dari profesional pada perbankan maupun lembaga keuangan non-bank. <i>The diversity of the Board of Directors' work experience comes from professionals in banking and non-bank financial institutions.</i>
Usia <i>Age</i>	Usia Direksi Bank antara 46-52 tahun. <i>The age of the members of the Bank's Board of Directors ranges between 46 and 52 years.</i>

Komposisi Direksi telah memenuhi unsur keberagaman, yaitu perpaduan dari sisi pendidikan, pengalaman kerja, dan usia.
The Board of Directors composition has fulfilled the elements of diversity, a combination of education, work experience, and age.

Penilaian Kinerja Direksi

Penilaian dan pengukuran terhadap kinerja anggota Direksi didasarkan pada hasil pelaksanaan tugas yang dilakukan oleh yang bersangkutan sesuai dengan target pencapaian kinerja Bank atau individu Direksi, baik dengan menilai kewajaran Laporan Keuangan, pencapaian rasio-rasio keuangan dan pangsa pasar, maupun pencapaian komponen-komponen lain yang tercantum dalam *key performance indicator* (KPI) Direksi. Laporan Pertanggungjawaban Direksi mengenai tugas-tugasnya disusun untuk selanjutnya dituangkan dalam Laporan Tahunan dan disetujui oleh RUPS Tahunan serta diunggah dalam situs web Bank dan kepada pihak-pihak lainnya sesuai peraturan perundang-undangan yang berlaku.

Performance Assessment of the Board of Directors

The performance assessment and measurement of the members of the Board of Directors are based on the results of their duties in regard to the Bank's or individual Director's performance targets. This process includes assessing the fairness of the Financial Statements, the financial ratios and market share figures achieved, and the achievement of other components listed in the Board of Directors' Key Performance Indicators (KPIs). The Board of Directors Accountability Report regarding their duties is prepared to be included in the Annual Report and approved by the Annual General Meeting of Shareholders. The report is also uploaded to the Bank's website and shared with other parties in accordance with applicable laws and regulations.

Selain itu, Bank melakukan self-assessment atas penerapan Tata Kelola Perusahaan (GCG) dengan salah satu aspek yang dinilai adalah Pelaksanaan Tugas dan Tanggung Jawab Direksi. Pada tahun 2024, aspek tersebut memperoleh nilai komposit 1 atau "Low". Hasil penilaian tersebut telah diungkapkan pada uraian Hasil *Self-Assessment* Tata Kelola Perusahaan (GCG) di dalam Laporan Tahunan ini.

Moreover, the Bank conducts a self-assessment of the implementation of Corporate Governance (GCG), with one of the assessed aspects being the Implementation of Duties and Responsibilities of the Board of Directors. In 2023, this aspect obtained a composite score of 1 or "Low". The results of this assessment have been disclosed in the description of the Self Assessment Results of Corporate Governance (GCG) in this Annual Report.

Penilaian Kinerja Organ Pendukung Direksi

Bank Sahabat Sampoerna turut melakukan penilaian kinerja terhadap organ pendukung Direksi yang dilakukan sebagai proses evaluasi untuk mengetahui pelaksanaan tugas dan

Performance Assessment of Board of Directors' Supporting Organs

The performance assessment of the organs supporting the Board of Directors is conducted as an evaluation process to ascertain the execution of duties and achievement

pencapaian target dari masing-masing organ pendukung. Proses penilaian ini dilakukan secara periodik dengan memperhatikan kriteria berikut:

1. Pelaksanaan tugas dan tanggung jawab selama tahun 2024.
2. Rekomendasi yang diberikan.
3. Tingkat kehadiran dalam masing-masing rapat komite.

Direksi menilai bahwa sepanjang tahun 2024 seluruh organ pendukung telah melaksanakan tugas dan tanggung jawab dengan baik, serta telah memenuhi pedoman kerja dan peraturan perundang-undangan yang berlaku. Direksi juga senantiasa memberikan saran dan rekomendasi kepada organ pendukung untuk memaksimalkan pelaksanaan tugas dan menyesuaikan dengan perkembangan bisnis terkini.

Program Pengenalan bagi anggota Direksi Baru

Bank Sahabat Sampoerna memiliki kebijakan bagi anggota Direksi yang baru diangkat untuk mengikuti program pengenalan perusahaan. Program pengenalan tersebut dilakukan untuk memberikan pemahaman mengenai tugas dan tanggung jawab sebagai anggota Direksi agar dijalankan sebaik-baiknya. Kegiatan ini juga bertujuan agar anggota Direksi dapat memahami latar belakang dan kegiatan usaha Bank agar dapat mempermudah dan melancarkan pelaksanaan tugas Direksi secara efektif.

Pada tahun 2024, Bank tidak melaksanakan program pengenalan bagi anggota Direksi baru sehubungan dengan tidak adanya perubahan komposisi dan susunan Direksi Bank Sahabat Sampoerna.

Pengembangan Kompetensi Direksi Tahun 2024

Bank Sahabat Sampoerna senantiasa memfasilitasi seluruh Insan Bank di seluruh level organisasi untuk mengikuti program pengembangan kompetensi guna memperluas wawasan dan meningkatkan kompetensi yang dimiliki dalam menunjang pelaksanaan tugas dan tanggung jawab. Informasi pengembangan kompetensi yang diikuti oleh Direksi sepanjang tahun 2024 diuraikan sebagai berikut:

of targets by each respective supporting organ. This assessment process is carried out periodically, taking into account the following criteria.

1. The implementation of duties and responsibilities throughout 2024.
2. Recommendations provided.
3. Attendance rate in each committee's meeting.

In 2024, all supporting organs of the Board of Directors executed their duties and responsibilities effectively and complied with the applicable work guidelines and laws and regulations. The Board of Directors consistently provided advice and recommendations to the supporting organs to maximize task execution and adapt to the latest business developments.

Introduction Program for New Board of Directors

Bank Sahabat Sampoerna has a policy for newly appointed Board of Directors to participate in the company's introduction program. The introduction program is carried out to provide an understanding of the duties and responsibilities as members of the Board of Directors so that they are carried out as well as possible. This activity also aims for members of the Board of Directors to understand the background and business activities of the Bank in order to facilitate and facilitate the implementation of the Board of Directors' duties effectively.

In 2024, the Bank will not implement an introduction program for new Board of Directors due to the absence of changes in the composition and structure of the Board of Directors of Bank Sahabat Sampoerna

Competency Development of the Board of Directors in 2024

Bank Sahabat Sampoerna always facilitates all Bank Personnel at all levels of the organization to participate in competency development programs to broaden their horizons and improve their competencies in supporting the implementation of their duties and responsibilities. Information on competency development participated by the Board of Directors throughout 2024 is described as follows:

Nama Name	Jabatan Position	Topik Pelatihan Training Topic	Penyelenggara Organizer	Tanggal Pelatihan Training Date
Ali Rukmijah	Direktur Utama President Director	<ul style="list-style-type: none"> • Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 • Learning from Milestones: Strategic Collaboration for Continuous Improvement • Risk Management Level 7 Certification Briefing & Exam • Learning from Milestones: Strategic Collaboration for Continuous Improvement 	Garda Bank Sahabat Sampoerna	5 Februari 3 Oktober February 5 October 3
Henry Suryaputra	Direktur Keuangan & Perencanaan Bisnis Finance & Business Planning Director	<ul style="list-style-type: none"> • Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 • Learning from Milestones: Strategic Collaboration for Continuous Improvement • Risk Management Level 7 Certification Briefing & Exam • Learning from Milestones: Strategic Collaboration for Continuous Improvement 	Garda Bank Sahabat Sampoerna	5 Februari 3 Oktober February 5 October 3

Nama Name	Jabatan Position	Topik Pelatihan Training Topic	Penyelenggara Organizer	Tanggal Pelatihan Training Date
Hendra Rahardja	Direktur Teknologi Informasi <i>Information Technology Director</i>	<ul style="list-style-type: none"> Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 The Innovative Technology Leader Program to be held Learning from Milestones: Strategic Collaboration for Continuous Improvement Risk Management Level 7 Certification Briefing & Exam The Innovative Technology Leader Program to be held Learning from Milestones: Strategic Collaboration for Continuous Improvement 	Garda Stanford Bank Sahabat Sampoerna	18 Januari 30 Juni 3 Oktober January 18 June 30 October 3
Rudy Mahasin	Direktur Bisnis UMKM <i>ESME Business Director</i>	<ul style="list-style-type: none"> Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 Learning from Milestones: Strategic Collaboration for Continuous Improvement Risk Management Level 7 Certification Briefing & Exam Learning from Milestones: Strategic Collaboration for Continuous Improvement 	Garda Bank Sahabat Sampoerna	5 Februari 3 Oktober February 5 October 3
A. Dendi Hardiansyah	Direktur Kepatuhan & Manajemen Risiko <i>Compliance and Risk Management Director</i>	<ul style="list-style-type: none"> Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 ASEAN Global Leadership Program : LSE 2024 at London School of Economics and Political Science (LSE) Learning from Milestones: Strategic Collaboration for Continuous Improvement Risk Management Level 7 Certification Briefing & Exam ASEAN Global Leadership Program: LSE 2024 at London School of Economics and Political Science (LSE) Learning from Milestones: Strategic Collaboration for Continuous Improvement 	Garda AGLP Bank Sahabat Sampoerna	5 Februari 2 September 3 Oktober February 5 September 2 October 3

Pelaksanaan Tugas Direksi Tahun 2024

Sepanjang tahun 2024, Direksi telah melaksanakan tugas dan tanggung jawabnya dalam pengelolaan Bank sesuai dengan pedoman kerja dan peraturan perundang-undangan yang berlaku, serta telah memenuhi rekomendasi dari para Pemegang Saham melalui sejumlah kegiatan, seperti:

- Menjalankan fungsi kepengurusan untuk kepentingan Bank sesuai dengan maksud dan sebagaimana tertuang dalam pedoman Direksi, anggaran dasar Bank, peraturan perundang-undangan yang berlaku, dan aspirasi pemegang saham (Keputusan RUPS).
- Menerapkan Tata Kelola yang Baik pada Bank, manajemen risiko, dan kepatuhan secara terintegrasi yang disesuaikan dengan perkembangan ekosistem perbankan terkini serta didukung dengan digitalisasi dan inovasi teknologi.
- Menerapkan Tata Kelola yang Baik pada Bank, Direksi paling sedikit wajib membentuk Satuan Kerja Audit Internal, Satuan Kerja Manajemen Risiko, dan Satuan Kerja Kepatuhan.
- Menindaklanjuti temuan audit atau pemeriksaan dan rekomendasi dari satuan kerja audit intern Bank, auditor eksterne, hasil pengawasan Otoritas Jasa Keuangan, dan/atau hasil pengawasan otoritas dan lembaga lain.
- Menyediakan data dan informasi yang akurat, relevan, dan tepat waktu, termasuk kepada Dewan Komisaris, dan melaksanakan pengelolaan data dan informasi sesuai dengan tata kelola yang baik pada Bank dan ketentuan peraturan perundang-undangan.

Implementation of the Board of Directors' Duties in 2024

Throughout 2024, the Board of Directors has carried out its duties and responsibilities in managing the Bank in accordance with the work guidelines and applicable laws and regulations, and has fulfilled the recommendations of the Shareholders through a number of activities, such as:

- Carrying out management functions for the interests of the Bank in accordance with the intent and as stated in the Board of Directors' guidelines, the Bank's articles of association, applicable laws and regulations, and shareholder aspirations (GMS Decisions).
- Implementing Good Governance at the Bank, risk management, and compliance in an integrated manner that is adjusted to the latest developments in the banking ecosystem and supported by digitalization and technological innovation.
- Implementing Good Governance at the Bank, the Board of Directors is required to form at least an Internal Audit Work Unit, a Risk Management Work Unit, and a Compliance Work Unit.
- Following up on audit findings or examinations and recommendations from the Bank's internal audit work unit, external auditors, the results of supervision by the Financial Services Authority, and/or the results of supervision by other authorities and institutions.
- Provide accurate, relevant and timely data and information, including to the Board of Commissioners, and carry out data and information management in accordance with good governance at the Bank and the provisions of laws and regulations.

Mekanisme Pengunduran Diri dan Pemberhentian Direksi

Mekanisme Pengunduran Diri

Mekanisme pengunduran diri anggota Direksi Bank Sahabat Sampoerna dijelaskan sebagai berikut:

1. Seorang anggota Direksi dapat mengundurkan diri dari jabatannya dengan menyampaikan permohonan secara tertulis kepada Bank dengan mencantumkan alasan pengunduran dirinya tersebut.
2. Permohonan pengunduran diri tersebut disampaikan kepada Bank selambatnya 30 hari sebelum efektif pengunduran diri disertai dengan alasan pengunduran dirinya, dan tetap kepada yang bersangkutan harus dimintakan pertanggungjawabannya di dalam RUPS tentang pelaksanaan tugasnya untuk masa jabatan sejak pertanggungjawaban yang berakhir sampai dengan tanggal efektif pengunduran dirinya.
3. Bank wajib melaporkan pengunduran diri anggota Direksi kepada regulator terkait dan menyelenggarakan RUPS sesuai dengan ketentuan perundang-undangan yang berlaku.
4. Anggota Direksi yang terlibat dalam kejahatan keuangan dan/atau tindak pidana lainnya wajib mengundurkan diri dari Direksi.

Mekanisme Pemberhentian

Bank Sahabat Sampoerna telah menyusun dan menetapkan mekanisme pemberhentian bagi anggota Direksi sebagai berikut:

1. Anggota Direksi dapat diberhentikan untuk sementara oleh Dewan Komisaris dengan menyebutkan alasannya.
2. Pemberhentian sementara anggota Direksi wajib disampaikan secara tertulis.
3. Dewan Komisaris harus menyelenggarakan RUPS untuk mencabut atau menguatkan keputusan pemberhentian sementara.
4. RUPS wajib diselenggarakan dalam jangka waktu paling lambat 90 hari setelah tanggal pemberhentian sementara.
5. Jika dalam waktu yang ditentukan RUPS tidak dapat mengambil keputusan, maka pemberhentian sementara menjadi batal.
6. Anggota Direksi yang diberhentikan sementara tidak berwenang untuk:
 - a. Menjalankan kepengurusan Bank; dan
 - b. Mewakili Bank di dalam maupun di luar pengadilan.
7. Batas kewenangan anggota Direksi berlaku sejak dikeluarkannya keputusan pemberhentian sementara oleh Dewan Komisaris sampai dengan:
 - a. Dikeluarkannya keputusan RUPS yang menguatkan atau membatalkan pemberhentian sementara; dan
 - b. Terlampauinya jangka waktu penyelenggaraan RUPS.

Mechanism of Resignation and Dismissal of Board of Directors

Resignation Mechanism

The mechanism for the resignation of members of the Board of Directors of Bank Sahabat Sampoerna is as follows.

1. A member of the Board of Directors may resign from the position by submitting a written application to the Bank outlining the reasons for such resignation.
2. The resignation request must be submitted to the Bank no later than 30 days prior to the resignation's effective date, along with the reasons for the resignation. This member is still held accountable at the GMS for the performance of duties throughout the term of office from the last accountability to the resignation's effective date.
3. In line with the relevant laws and regulations, the Bank must conduct a GMS and notify the appropriate regulators of any resignations from the Board of Directors.
4. Members of the Board of Directors involved in financial crimes and/or other criminal acts must resign from their positions as members of the Board of Directors.

Dismissal Mechanism

Bank Sahabat Sampoerna has formulated and established the following mechanism for the dismissal of members of the Board of Directors.

1. Members of the Board of Directors may be suspended by the Board of Commissioners by stating the reasons.
2. Suspension of members of the Board of Directors must be submitted in writing.
3. The Board of Commissioners must hold a GMS to revoke or affirm the resolution on the suspension.
4. The GMS must be convened no more than 90 days after the suspension date.
5. If, within the determined time, the GMS cannot make any resolution, the suspension will be canceled.
6. The suspended member of the Board of Directors is not authorized to:
 - a. Run the Bank's management; and
 - b. Represent the Bank inside and outside the court.
7. The limit of authority of the said member of the Board of Directors shall enter into force from the issuance of suspension by the Board of Commissioners until:
 - a. A GMS resolution that reinforces or cancels the suspension is adopted; and
 - b. The duration of the GMS has passed

Nominasi dan Remunerasi Dewan Komisaris dan Direksi

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

Prosedur Nominasi Dewan Komisaris dan Direksi

Kebijakan Nominasi Dewan Komisaris dan Direksi mengacu pada ketentuan Otoritas Jasa Keuangan yang berlaku dan Anggaran Dasar Bank. Berdasarkan ketentuan tersebut, calon Dewan Komisaris dan Direksi yang dinominasikan harus memenuhi persyaratan yang telah ditentukan dalam Anggaran Dasar Bank dan peraturan perundang-undangan yang berlaku, dengan melakukan seleksi sesuai dengan yang dipersyaratkan oleh peraturan tersebut.

Adapun proses nominasi Dewan Komisaris dan Direksi adalah sebagai berikut:

1. Kandidat yang dinominasikan dapat diajukan dengan memenuhi syarat kriteria yang berlaku dan dapat berasal dari sumber internal dan eksternal.
2. Nominasi kandidat dilengkapi dengan syarat administrasi yang ditetapkan dan diproses melalui seleksi oleh Komite Remunerasi dan Nominasi.
3. Komite Remunerasi dan Nominasi dapat melakukan pertemuan lebih lanjut dalam rangka mengenali kualifikasi kandidat yang dinominasikan.
4. Komite Remunerasi dan Nominasi dapat melibatkan pihak lain yang dinilai independen untuk dimintai opini (jika perlu), termasuk melakukan *interview* bersama pihak independen tersebut, dengan syarat pengambilan keputusan tetap dilakukan oleh Komite Remunerasi dan Nominasi.
5. Kandidat nominasi yang direkomendasikan oleh Komite Remunerasi dan Nominasi wajib mengikuti *fit and proper test* yang dilakukan oleh otoritas keuangan berwenang dan hasil keputusan yang dihasilkan menjadi rekomendasi untuk RUPS dalam rangka pengesahan dan/atau penetapan hasil keputusan tersebut.

Nomination Procedure for the Board of Commissioners and the Board of Directors

The Nomination Policy for the Board of Commissioners and the Board of Directors refers to the prevailing Financial Services Authority regulations and the Bank's Articles of Association. Based on these provisions, nominated candidates for the Board of Commissioners and the Board of Directors must meet the requirements stipulated in the Bank's Articles of Association and applicable laws and regulations. A selection process is conducted in accordance with these requirements.

The nomination process for the Board of Commissioners and the Board of Directors is as follows.

1. *Nominated candidates may be proposed by meeting the applicable criteria and may come from both internal and external sources.*
2. *The nomination of candidates is accompanied by the required administrative documents, which go through a selection process by the Remuneration and Nomination Committee.*
3. *The Remuneration and Nomination Committee may hold further meetings to recognize the qualifications of the nominated candidates.*
4. *The Remuneration and Nomination Committee may involve other parties deemed independent for opinions (if necessary), including conducting interviews with these independent parties, provided that decision-making is still carried out by the Remuneration and Nomination Committee.*
5. *Nominated candidates recommended by the Remuneration and Nomination Committee must undergo a fit and proper test conducted by the authorized financial authority, and the resulting decision serves as a recommendation for the General Meeting of Shareholders for the ratification and/or approval of the decision*

Prosedur Penetapan Remunerasi Dewan Komisaris dan Direksi

Remunerasi Dewan Komisaris dan Direksi ditetapkan berdasarkan hasil kinerja dan posisi jabatan. Penilaian kinerja masing-masing organ dilakukan dengan berpedoman pada *key performance indicator* (KPI) dengan pelaksanaan di awal dan di akhir tahun buku. Bank meyakini bahwa pemberian remunerasi yang baik dan objektif dapat memberikan dampak positif pada kinerja Bank karena akan menyelaraskan kepentingan antara Pemegang Saham dengan Dewan Komisaris dan Direksi sebagai sumber daya utama yang bertanggung jawab dalam mengawasi dan mengelola keberlangsungan bisnis Bank.

Penetapan remunerasi di Bank Sahabat Sampoerna juga sebagai bentuk apresiasi atas pelaksanaan tugas dan pencapaian target yang telah ditentukan dengan membagi dalam 2 jenis remunerasi, yaitu:

1. Remunerasi Tetap
Remunerasi yang diberikan atas pelaksanaan tugas dan tanggung jawab jabatan Dewan Komisaris dan Direksi selama tahun buku.
2. Remunerasi Variabel
Remunerasi yang diberikan atas pencapaian kinerja Bank serta kontribusi dan pencapaian masing-masing anggota Dewan Komisaris dan anggota Direksi yang ditetapkan berdasarkan *key performance indicator* (KPI).

Struktur dan Besaran Remunerasi Dewan Komisaris dan Direksi

Penerapan kebijakan remunerasi Dewan Komisaris dan Direksi Bank Sahabat Sampoerna senantiasa mengacu pada POJK No. 45/POJK.03/2015 dan SEOJK No. 40/SEOJK.03/2016 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum. Berdasarkan ketentuan tersebut, Dewan Komisaris berhak mendapatkan struktur remunerasi yang terdiri atas honorarium, tunjangan hari raya (THR), serta fasilitas asuransi kesehatan dan Badan Penyelenggaraan Jaminan Sosial (BPJS) Ketenagakerjaan. Sementara Direksi, mendapatkan struktur remunerasi yang terdiri atas gaji pokok, THR, subsidi kepemilikan kendaraan, transportasi dan komunikasi, serta fasilitas kesehatan dan BPJS Kesehatan/Ketenagakerjaan.

Adapun informasi mengenai struktur dan besaran remunerasi masing-masing anggota Dewan Komisaris dan Direksi diuraikan sebagai berikut:

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

The remuneration of the Board of Commissioners and Board of Directors is determined based on performance results and job positions. The performance assessment of each organ is carried out based on key performance indicators (KPIs) with implementation at the beginning and end of the financial year. The Bank believes that providing good and objective remuneration can have a positive impact on the Bank's performance because it will align the interests of Shareholders with the Board of Commissioners and Board of Directors as the main resources responsible for supervising and managing the sustainability of the Bank's business.

The determination of remuneration at Bank Sahabat Sampoerna is also a form of appreciation for the implementation of tasks and achievement of predetermined targets by dividing it into 2 types of remuneration, namely:

1. *Fixed Remuneration*
Remuneration given for the implementation of the duties and responsibilities of the Board of Commissioners and Board of Directors during the financial year.
2. *Variable Remuneration*
Remuneration given for the achievement of the Bank's performance as well as the contribution and achievements of each member of the Board of Commissioners and Board of Directors which is determined based on key performance indicators (KPIs).

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

The implementation of the remuneration policy for the Board of Commissioners and Directors of Bank Sahabat Sampoerna always refers to POJK No. 45/POJK.03/2015 and SEOJK No. 40/SEOJK.03/2016 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks. Based on these provisions, the Board of Commissioners is entitled to a remuneration structure consisting of honorarium, holiday allowance (THR), as well as health insurance facilities and the Social Security Administration Agency (BPJS) for Employment. Meanwhile, the Board of Directors receives a remuneration structure consisting of basic salary, THR, vehicle ownership subsidies, transportation and communication, as well as health facilities and BPJS Health/Employment.

The information regarding the structure and amount of remuneration for each member of the Board of Commissioners and Directors is described as follows:

Jumlah Remunerasi dan Fasilitas Lain yang Diterima Dewan Komisaris
Amount of Remuneration and Other Facilities Received by the Board of Commissioners

Jenis Remunerasi dan Fasilitas Lain <i>Types of Remuneration and Other Facilities</i>	Jumlah Diterima dalam 1 Tahun <i>Amount Received in 1 Year</i>	
	Dewan Komisaris <i>Board of Commissioners</i>	
	Orang <i>Persons</i>	Nominal (Rp juta) <i>Amount (Rp million)</i>
Remunerasi (gaji, bonus, tunjangan rutin, tantiem, dan fasilitas lainnya dalam bentuk non-natura) <i>Remuneration (salary, bonus, routine allowance, tantiem, and other facilities in non-kind form)</i>	4	3.644
Fasilitas lain dalam bentuk natura (perumahan, fasilitas kesehatan, dan sebagainya) yang: <i>Other facilities in kind (housing, health facilities, etc.) which:</i>	4	0.232
Dapat dimiliki <i>Can be owned</i>	4	0.232*
Tidak dapat dimiliki <i>Cannot be owned</i>	Nihil <i>None</i>	Nihil <i>None</i>
Jumlah <i>Total</i>	4	3.876

*) Premi Asuransi | Insurance Premium

Jumlah Remunerasi Tunai yang Diterima Dewan Komisaris
Amount of Cash Remuneration Received by the Board of Commissioners

Jumlah Remunerasi Tunai per Orang dalam 1 Tahun* <i>Total Cash Remuneration per Person in 1 Year*</i>	Jumlah Dewan Komisaris <i>Total Members of the Board of Commissioners</i>
Di atas Rp2 miliar <i>Above Rp2 billion</i>	0
Di atas Rp1 miliar - Rp2 miliar <i>Above Rp1 billion - Rp2 billion</i>	2
Di atas Rp500 juta - Rp1 miliar <i>Above Rp500 million - Rp1 billion</i>	1
Rp500 juta ke bawah <i>Rp500 million and below</i>	1

*) Jumlah yang diterima secara tunai | Received in cash

Jumlah Remunerasi yang Bersifat Variabel yang Diterima
Variable Remuneration Received

Keterangan <i>Description</i>	Jumlah Diterima dalam 1 Tahun <i>Amount Received in 1 Year</i>	
	Dewan Komisaris <i>Board of Commissioners</i>	
	Orang <i>Persons</i>	Nominal (Rp juta) <i>Nominal (Rp million)</i>
Remunerasi yang Bersifat Variabel yang Diterima <i>Variable Remuneration Received</i>	4	229,5

Jumlah Remunerasi dan Fasilitas Lain yang Diterima Direksi
Amount of Remuneration and Other Facilities Received by the Board of Directors

Jenis Remunerasi dan Fasilitas Lain <i>Types of Remuneration and Other Facilities</i>	Jumlah Diterima dalam 1 Tahun <i>Amount Received in 1 Year</i>	
	Direksi <i>Board of Directors</i>	
	Orang <i>Persons</i>	Nominal <i>(Rp juta)</i>
Remunerasi (gaji, bonus, tunjangan rutin, tantiem, dan fasilitas lainnya dalam bentuk non-natura) <i>Remuneration (salary, bonus, routine allowances, tantiem, and other non in kind facilities)</i>	5	37.597

Jenis Remunerasi dan Fasilitas Lain <i>Types of Remuneration and Other Facilities</i>	Jumlah Diterima dalam 1 Tahun <i>Amount Received in 1 Year</i>	
	Direksi <i>Board of Directors</i>	
	Orang <i>Persons</i>	Nominal <i>(Rp juta)</i>
Fasilitas lain dalam bentuk natura (perumahan, fasilitas kesehatan, dan sebagainya) yang: <i>Other facilities in kind (housing, health facilities, etc.) which:</i>	5	0.950
Dapat dimiliki <i>Can be owned</i>	5	0.950*
Tidak dapat dimiliki <i>Cannot be owned</i>	Nihil <i>None</i>	Nihil <i>None</i>
Jumlah <i>Total</i>	5	38.547

*) Premi Asuransi | Insurance Premium

Jumlah Remunerasi Tunai yang Diterima Direksi**Total Cash Remuneration Received by the Board of Directors**

Jumlah Remunerasi Tunai per Orang dalam 1 Tahun* <i>Total Cash Remuneration per Person in 1 Year*</i>	Jumlah Dewan Komisaris <i>Total Board of Directors</i>
Di atas Rp2 miliar <i>Above Rp2 billion</i>	5
Di atas Rp1 miliar - Rp2 miliar <i>Above Rp1 billion - Rp2 billion</i>	-
Di atas Rp500 juta - Rp1 miliar <i>Above Rp500 million - Rp1 billion</i>	-
Rp500 juta ke bawah <i>Rp500 million and below</i>	-

*) Jumlah yang diterima secara tunai | Received in cash

Jumlah Remunerasi yang Bersifat Variabel yang Diterima**Variable Remuneration Received**

Keterangan <i>Description</i>	Jumlah Diterima dalam 1 Tahun <i>Amount Received in 1 Year</i>			
	Direksi <i>Board of Directors</i>		Pegawai <i>Employee</i>	
	Orang <i>Persons</i>	Nominal (Rp juta) <i>Nominal (Rp million)</i>	Orang <i>Persons</i>	Nominal (Rp juta) <i>Nominal (Rp million)</i>
Remunerasi yang Bersifat Variabel yang Diterima <i>Variable Remuneration Received</i>	5	13.049	588	13.113

Rasio Gaji**Salary Ratio**

Berdasarkan remunerasi yang diterima oleh Dewan Komisaris dan Direksi, rasio gaji karyawan dan Dewan Komisaris dan/atau Direksi pada tahun 2024 dapat dilihat sebagai berikut:

Based on the remuneration received by the Board of Commissioners and Board of Directors, the ratio of employee salaries and the Board of Commissioners and/or Board of Directors in 2024 can be seen as follows:

Rasio Gaji Tertinggi dan Terendah <i>Ratio of Highest and Lowest Salary</i>	Rasio 2024 <i>2024 Ratio</i>
Rasio gaji karyawan tertinggi dan terendah <i>Ratio of employee's highest and lowest salary</i>	1:106
Rasio gaji Direksi tertinggi dan terendah <i>Ratio of the Board of Director's highest and lowest salary</i>	1:3.2
Rasio gaji Dewan Komisaris tertinggi dan terendah <i>Ratio of the Board of Commissioner's highest and lowest salary</i>	1:2.2
Rasio gaji Direksi tertinggi dan karyawan terendah <i>Ratio of the Board of Director's highest salary and employee's lowest salary</i>	1:150

Jumlah Nominal Pesangon yang Dibayarkan per Orang dalam 1 Tahun
Total Nominal of Severance Pay Per Person in 1 Year

Jumlah Nominal Pesangon yang Dibayarkan per Orang dalam 1 Tahun <i>Total Nominal of Severance Pay Per Person in 1 Year</i>	Total Pegawai <i>Total Employees</i>
Di atas Rp1 miliar <i>Above Rp1 billion</i>	4
Di atas Rp500 juta - Rp1 miliar <i>Above Rp500 million - Rp1 billion</i>	4
Di bawah Rp500 juta <i>Below Rp500 million</i>	116

Remunerasi yang Bersifat Variabel
Variable Remuneration

Bank tidak memiliki kebijakan pemberian saham/opsi pembelian saham kepada Dewan Komisaris, Direksi, dan Pejabat Eksekutif. Dengan demikian total remunerasi yang diberikan kepada *Material Risk Taker* (MRT) diungkapkan sebagai berikut:

The Bank does not have a policy of granting shares/stock purchase options to the Board of Commissioners, Directors, and Executive Officers. Thus, the total remuneration given to Material Risk Takers (MRT) is disclosed as follows:

No.	Keterangan <i>Description</i>	Nominal (Rp juta) <i>Nominal (Rp million)</i>	
1.	Remunerasi yang Bersifat Tetap* Fixed Remuneration		
a.	Tunai Cash	44.486	
b.	Saham/instrumen berbasis saham yang diterbitkan Bank <i>Shares/share-based instruments issued by the Bank</i>	Nihil <i>None</i>	
2.	Remunerasi yang Bersifat Variabel* Variable Remuneration	Tidak Ditangguhkan <i>Not Deferred</i>	Ditangguhkan <i>Deferred</i>
a.	Tunai Cash	18.666	13.246
b.	Saham/instrumen berbasis saham yang diterbitkan Bank <i>Shares/share-based instruments issued by the Bank</i>	Nihil <i>None</i>	Nihil <i>None</i>

*) Hanya untuk MRT / Only for MRT

Informasi Kuantitatif
Quantitative Information

Jenis Remunerasi yang Bersifat Variabel* <i>Types of Variable Remuneration*)</i>	Total Pengurangan Selama Periode Laporan <i>Total Deduction During the Reporting Period</i>			
	Sisa yang Masih Ditangguhkan <i>Deferred Balance</i>	Disebabkan Penyesuaian Eksplisit <i>Explicit Adjustment</i>	Disebabkan Penyesuaian Implisit <i>Implicit Adjustment</i>	Total (A) + (B)
Tunai (dalam jutaan Rupiah) <i>Cash (in million Rupiah)</i>	13.246	Nihil <i>None</i>	Nihil <i>None</i>	13.246
Saham/instrumen berbasis saham yang diterbitkan Bank (dalam lembar saham dan nominasi juta Rupiah yang merupakan konversi dari lembar saham tersebut) <i>Shares/share-based instruments issued by the Bank (in shares and nominations of million Rupiah, which are conversions from these shares)</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>

*) Hanya untuk MRT / Only for MRT

Komite dan Organ Pendukung Dewan Komisaris

Committees and Supporting Organs of the Board of Commissioners

Dalam menjalankan fungsi pengawasan atas pengelolaan perusahaan, Bank membentuk sejumlah organ pendukung untuk membantu pelaksanaan tugas Dewan Komisaris lebih optimal. Organ Pendukung Dewan Komisaris Bank Sahabat Sampoerna terdiri dari Komite Audit, Komite Remunerasi dan Nominasi, serta Komite Pemantau Risiko. Informasi mengenai masing-masing organ pendukung Dewan Komisaris diuraikan sebagai berikut.

Komite Audit

Komite Audit merupakan organ pendukung Dewan Komisaris yang bertugas untuk mendukung pelaksanaan tugas Dewan Komisaris dalam memantau, memeriksa, dan menelaah Laporan Keuangan Bank, baik bulanan, triwulanan, ataupun tahunan. Selain itu, Komite Audit bertanggung jawab dalam merekomendasikan akuntan eksternal, memeriksa kepatuhan Bank terhadap peraturan yang berlaku, serta mengawasi penerapan GCG secara keseluruhan.

Piagam Komite

Komite Audit melaksanakan tugas dan tanggung jawabnya dengan berpedoman pada Piagam Komite Audit yang telah diperbarui dan disetujui oleh Dewan Komisaris dan efektif berlaku pada tanggal 1 Desember 2023. Piagam Komite Audit tersebut terdiri dari:

1. Tujuan Umum;
2. Fungsi dan Peranan Secara Umum;
3. Tugas dan Tanggung Jawab;
4. Wewenang;
5. Tata Cara dan Prosedur Kerja;
6. Struktur dan Keanggotaan;
7. Persyaratan Keanggotaan;
8. Masa Tugas;
9. Mekanisme Kerja;
10. Waktu Kerja;
11. Rapat Komite;
12. Mekanisme Pengambilan Keputusan Rapat;
13. Risalah Rapat;
14. Pelaporan;
15. Penanganan Pengaduan/Pelaporan Dugaan/
Pelanggaran Pelaporan Keuangan; dan
16. Penutup.

In carrying out its supervisory function over the management of the company, the Bank has formed a number of supporting organs to assist in the implementation of the Board of Commissioners' duties more optimally. The Supporting Organs of the Board of Commissioners of Bank Sahabat Sampoerna consist of the Audit Committee, the Remuneration and Nomination Committee, and the Risk Monitoring Committee. Information regarding each supporting organ of the Board of Commissioners is described as follows.

Audit Committee

The Audit Committee is a supporting organ of the Board of Commissioners, whose role involves checking, examining, and reviewing the Bank's monthly, quarterly, and annual Financial Statements. In addition, the Audit Committee is responsible for recommending external accountants, inspecting the Bank's compliance with applicable regulations, and overseeing the overall implementation of Good Corporate Governance (GCG).

Charter

The Audit Committee Charter, which serves as a work guideline, has been updated and approved by the Board of Commissioners. It came into effect on 1 December 2023 and consists of the following:

1. *General Purpose;*
2. *Functions and Roles in General;*
3. *Duties and Responsibilities;*
4. *Authority;*
5. *Work Conduct and Procedures;*
6. *Structure and Composition;*
7. *Membership Requirements;*
8. *Term of Office;*
9. *Work Mechanism;*
10. *Business Hours;*
11. *Committee Meetings;*
12. *Decision-Making Mechanism in Meetings;*
13. *Minutes of Meeting;*
14. *Reporting;*
15. *Handling of Complaints/Reports on Alleged/Violations of Financial Reporting; and*
16. *Closing.*

Komposisi dan Profil Komite

Per 31 Desember 2024, komposisi Komite Audit Bank berjumlah 3 (tiga) orang yang terdiri dari 1 (satu) orang Ketua yang berasal dari Komisaris Independen Bank, serta 2 (dua) orang pihak independen yang mempunyai pengalaman di bidang keuangan atau akuntansi, hukum, dan perbankan. Sebagai organ pendukung Dewan Komisaris, Komite Audit bertanggung jawab, berkoordinasi, serta menyampaikan Laporan Pelaksanaan Tugas secara langsung kepada Dewan Komisaris Bank. Adapun komposisi Komite Audit Bank Sahabat Sampoerna di tahun 2024 diungkapkan sebagai berikut:

Committee Composition and Profile

As of December 31, 2024, the composition of the Bank's Audit Committee consists of 3 (three) people consisting of 1 (one) Chairperson who is an Independent Commissioner of the Bank, and 2 (two) independent parties who have experience in finance or accounting, law, and banking. As a supporting organ of the Board of Commissioners, the Audit Committee is responsible for, coordinating, and submitting the Task Implementation Report directly to the Bank's Board of Commissioners. The composition of the Bank Sahabat Sampoerna Audit Committee in 2024 is disclosed as follows:

Nama Name	Jabatan Position	Dasar Pengangkatan Basis of Appointment	Akhir Periode Jabatan End of Term of Office
Anggar Budhi Nuraini	Ketua Chairperson	Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 tanggal 19 Mei 2023 <i>The Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 dated 19 May 2023.</i>	19 Mei 2026 May 19, 2026
Juwono Akuan Rokanta	Anggota Member	<ul style="list-style-type: none"> Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 tanggal 19 Mei 2023 Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/VIII/2021 tanggal 18 Agustus 2021 <i>The Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 dated 19 May 2023; and</i> <i>The Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/VIII/2021 dated 18 August 2021.</i> 	19 Mei 2026 May 19, 2026
Muhammad Rizaldy	Anggota Member	Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 tanggal 19 Mei 2023. <i>The Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 dated 19 May 2023.</i>	19 Mei 2026 May 19, 2026

Anggar Budhi Nuraini

Ketua Komite Audit Chairperson of the Audit Committee

Profil Anggar Budhi Nuraini selaku Ketua Komite Audit dapat dilihat pada bagian Profil Dewan Komisaris dalam Bab Profil Perusahaan Laporan Tahunan ini.
The profile of Anggar Budhi Nuraini as Chairperson of the Audit Committee can be seen in the Board of Commissioners Profile section in the Company Profile Chapter of this Annual Report.



Juwono Akuan Rokanta

Anggota Komite Audit

Member of the Audit Committee

Kewarganegaraan | Nationality
Indonesia | Indonesian

Usia | Age
63 Tahun | years old

Domisili | Domicile
Bogor, Jawa Barat, Indonesia
Bogor, West Java, Indonesia

Dasar Hukum Pengangkatan Legal Basis of Appointment

- 2023-2026: Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 tanggal 19 Mei 2023
- 2021-2023: Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/VIII/2021 tanggal 18 Agustus 2021
- 2023-2026: *Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 dated 19 May 2023*
- 2021-2023: *Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/VIII/2021 dated 18 August 2021*

Riwayat Pendidikan Education

- Magister Manajemen, Sekolah Tinggi Manajemen Bandung, Bandung (1995)
- Sarjana Ekonomi jurusan Manajemen, Universitas Katolik Atmajaya, Jakarta (1986)
- Master of Management, Bandung Management College, Bandung (1995)*
- Bachelor of Economics majoring in Management, Atmajaya Catholic University, Jakarta (1986)*

Keahlian <i>Expertise</i>	Ekonomi, Manajemen, dan Perbankan <i>Economics, Management, and Banking</i>
Sertifikasi Profesi <i>Professional Certification</i>	<ul style="list-style-type: none"> Sertifikasi Manajemen Risiko Jenjang 7 <i>Risk Management Certification Level 7</i>
Riwayat Pekerjaan <i>Work Experience</i>	<p>Menduduki beberapa posisi di PT Bank Danamon Indonesia Tbk:</p> <ul style="list-style-type: none"> Collector Advisor SEMM Business Internal Control, Fraud Management, and ORM Head - Executive Vice President SEMM Business SUM and UKM Head - Executive Vice President SEMM Business Special Unit Management Head - Senior Vice President/Executive Vice President SEMM Business Risk Management Head - Senior Vice President SEMM Business CSA and Documentation Risk Head - Senior Vice President SME-C Credit Risk Division Credit Audit Head - Vice President Satuan Kerja Audit Internal Regional Manager II - Jawa Barat/Bandung (Vice President) Regional Manager Sumatra/Medan - Vice President (sementara) Division Head of Credit Quality Assurance - Vice President Deputy Chief Credit Control - Vice President (Division Head) Credit Risk Division Head - Vice President Coordinator of Credit Commercial and Corporate - Vice President Senior Credit Officer Jawa Barat Senior Credit Officer Jawa Tengah Credit Review Department Head - Assistant Vice President Credit Department Head - Senior Assistant Manager Cabang Jatinegara Assistant on Credit Department and Account Office - Assistant Manager Cabang Jatinegara <p>several positions at PT Bank Danamon Indonesia Tbk:</p> <ul style="list-style-type: none"> Collector Advisor SEMM Business Internal Control, Fraud Management, and ORM Head - Executive Vice President SEMM Business SUM and UKM Head - Executive Vice President SEMM Business Special Unit Management Head - Senior Vice President/Executive Vice President SEMM Business Risk Management Head - Senior Vice President SEMM Business CSA and Documentation Risk Head - Senior Vice President SME-C Credit Risk Division Credit Audit Head - Vice President of the Internal Audit Work Unit Regional Manager II - West Java/Bandung (Vice President) Regional Manager Sumatra/Medan - Vice President (temporary) Division Head of Credit Quality Assurance - Vice President Deputy Chief Credit Control - Vice President (Division Head) Credit Risk Division Head - Vice President Coordinator of Credit Commercial and Corporate - Vice President Senior Credit Officer West Java Senior Credit Officer Central Java Credit Review Department Head - Assistant Vice President Credit Department Head - Senior Assistant Manager Jatinegara Branch Assistant on Credit Department and Account Office - Assistant Manager Jatinegara Branch
Rangkap Jabatan <i>Concurrent Positions</i>	Anggota Komite Pemantau Risiko PT Bank Sahabat Sampoerna (sejak 2017) <i>Member of the Risk Monitoring Committee of PT Bank Sahabat Sampoerna (since 2017)</i>
Hubungan Afiliasi <i>Affiliation Relationship</i>	Tidak memiliki hubungan keuangan, kepengurusan, dan kekeluargaan dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali. <i>Has no financial, management, and family relationships with members of the Board of Commissioners, members of the Board of Directors, and Majority and Controlling Shareholders.</i>
Kepemilikan Saham <i>Share Ownership</i>	Tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic. <i>Has no shares, either in Bank Sahabat Sampoerna or other companies affiliated with the Sampoerna Strategic Group.</i>



Muhammad Rizaldy

● Anggota Komite Audit

Member of the Audit Committee

Kewarganegaraan | Nationality
Indonesia | Indonesian

Usia | Age
61 Tahun | years old

Domisili | Domicile
Bogor, Jawa Barat, Indonesia
Bogor, West Java, Indonesia

Dasar Hukum Pengangkatan <i>Legal Basis of Appointment</i>	2023-2026: Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 tanggal 19 Mei 2023 <i>2023-2026: Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 dated 19 May 2023</i>
Riwayat Pendidikan <i>Education</i>	<ul style="list-style-type: none"> • Magister Manajemen Prasetiya Mulya Business School, Jakarta (1999) • Sarjana Ekonomi, Universitas Padjadjaran, Bandung (1989) • Master of Management Prasetiya Mulya Business School, Jakarta (1999) • Bachelor of Economics, Padjadjaran University, Bandung (1989)
Keahlian <i>Expertise</i>	Ekonomi Perbankan <i>Banking Economics</i>
Sertifikasi Profesi <i>Professional Certification</i>	Sertifikasi Manajemen Risiko Jenjang 4 <i>Risk Management Certification Level 4</i>
Riwayat Pekerjaan <i>Work Experience</i>	<ul style="list-style-type: none"> • Co-Founder & Finance Director PT Indoasia Energi Persada • Founder & Director PT Indoasia Sawit Persada • Branch Audit Group Head PT Bank Danamon Indonesia Tbk • Co-Founder & Finance Director PT Indoasia Energi Persada • Founder & Director PT Indoasia Sawit Persada • Branch Audit Group Head PT Bank Danamon Indonesia Tbk
Rangkap Jabatan <i>Concurrent Positions</i>	Tidak memiliki rangkap jabatan di perusahaan lain di luar Grup Sampoerna Strategic <i>Does not hold concurrent positions in other companies outside the Sampoerna Strategic Group</i>
Hubungan Afiliasi <i>Affiliation Relationship</i>	Tidak memiliki hubungan keuangan, kepengurusan, dan kekeluargaan dengan anggota Dewan Komisaris lainnya, anggota Direksi, serta Pemegang Saham Utama dan Pengendali. <i>Does not have financial, management, and family relationships with other members of the Board of Commissioners, members of the Board of Directors, and Majority and Controlling Shareholders.</i>
Kepemilikan Saham <i>Share Ownership</i>	Tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic. <i>Does not have shares, either in Bank Sahabat Sampoerna or other companies affiliated with the Sampoerna Strategic Group.</i>

Tugas, Tanggung Jawab, dan Wewenang Komite

Mengacu kepada Piagam Komite Audit, tugas dan tanggung jawab Komite Audit adalah sebagai berikut:

1. Perencanaan dan pelaksanaan audit serta pemantauan atas tindak lanjut hasil audit dalam rangka menilai kecukupan pengendalian intern, termasuk kecukupan proses pelaporan keuangan.
2. Berpartisipasi dalam proses memberikan rekomendasi dalam penunjukan Kepala Satuan Kerja Audit Internal (SKAI).
3. Melakukan review atas informasi keuangan yang akan dikeluarkan Bank kepada publik dan/atau pihak otoritas antara lain Laporan Keuangan, proyeksi, dan laporan lainnya terkait dengan informasi keuangan Bank.
4. Melakukan penelaahan atas kepatuhan Bank terhadap peraturan perundang-undangan yang berlaku terkait dengan kegiatan usaha Bank.

Duties, Responsibilities, and Authorities of the Committee

Referring to the Audit Committee Charter, the duties and responsibilities of the Audit Committee are as follows:

1. Planning and implementing audits and monitoring the follow-up of audit results in order to assess the adequacy of internal control, including the adequacy of the financial reporting process.
2. Participating in the process of providing recommendations in the appointment of the Head of the Internal Audit Work Unit (SKAI).
3. Reviewing financial information to be issued by the Bank to the public and/or authorities, including Financial Reports, projections, and other reports related to the Bank's financial information.
4. Reviewing the Bank's compliance with applicable laws and regulations related to the Bank's business activities.

5. Memberikan pendapat independen dalam hal terjadi perbedaan pendapat antara manajemen dan kantor akuntan publik atas jasa yang diberikannya.
 6. Memberikan rekomendasi kepada Dewan Komisaris mengenai penunjukan Kantor Akuntan Publik (KAP) dan Akuntan Publik (AP) yang didasarkan pada independensi, ruang lingkup penugasan, dan imbalan jasa.
 7. Menelaah dan melaporkan kepada Dewan Komisaris atas pengaduan yang berkaitan dengan proses akuntansi dan pelaporan keuangan Bank.
 8. Menghindari segala bentuk benturan kepentingan dalam pelaksanaan tugas pengelolaan dan pengawasan Bank. Dalam hal terjadi benturan kepentingan, wajib mengungkapkan benturan kepentingan dalam setiap keputusan yang memenuhi kondisi adanya benturan kepentingan serta dilarang mengambil tindakan yang berpotensi merugikan Bank atau mengurangi keuntungan Bank.
 9. Melakukan penelaahan dan pemantauan atas implementasi GCG yang efektif dan berkelanjutan.
 10. Menjaga kerahasiaan dokumen, data, dan informasi Bank.
 11. Menjalankan tugas-tugas lain yang relevan dengan fungsi Komite Audit dan penugasan dari Dewan Komisaris, termasuk namun tidak terbatas pada penyelenggaraan Rapat Komite Audit.
 12. Laporan Keuangan:
 - a. Mempelajari secara mendalam Rencana Kerja dan Anggaran Bank;
 - b. Mempelajari secara mendalam Laporan Keuangan interim dan tahunan, baik yang diaudit maupun yang tidak diaudit;
 - c. Mempelajari secara mendalam laporan realisasi rencana kerja dan anggaran serta meneliti pos-pos yang mempunyai perbedaan angka/nilai yang signifikan;
 - d. Melakukan pertemuan secara berkala dengan unit kerja terkait dan auditor eksternal yang memeriksa Bank untuk meminta tambahan informasi dan klarifikasi dalam bidang akuntansi dan keuangan; serta
 - e. Melaporkan secara berkala atas hasil pemantauannya dan memberi masukan atas hal-hal yang perlu menjadi perhatian Dewan Komisaris.
 13. Pengendalian Internal:
 - a. Mempelajari dan memastikan bahwa Bank telah memiliki sistem pengendalian internal (internal control system) yang baku sesuai dengan praktik yang berlaku;
 - b. Mempelajari secara mendalam laporan hasil pemeriksaan SKAI dan auditor eksternal yang memeriksa Bank guna memastikan bahwa pengendalian internal telah dilaksanakan dengan benar;
 - c. Melakukan pertemuan berkala dengan unit-unit kerja yang terkait dengan sistem pengendalian internal dan pelaksanaannya;
 - d. Melakukan pemantauan dan evaluasi terhadap pelaksanaan tindak lanjut Direksi atas hasil temuan
5. *Providing independent opinions in the event of differences of opinion between management and the public accounting firm regarding the services provided.*
 6. *Providing recommendations to the Board of Commissioners regarding the appointment of a Public Accounting Firm (KAP) and Public Accountant (AP) based on independence, scope of assignment, and service fees.*
 7. *Reviewing and reporting to the Board of Commissioners regarding complaints related to the Bank's accounting and financial reporting processes.*
 8. *Avoiding all forms of conflict of interest in carrying out the Bank's management and supervision duties. In the event of a conflict of interest, it is mandatory to disclose the conflict of interest in every decision that meets the conditions for a conflict of interest and is prohibited from taking actions that have the potential to harm the Bank or reduce the Bank's profits.*
 9. *Conducting reviews and monitoring of the implementation of effective and sustainable GCG.*
 10. *Maintaining the confidentiality of the Bank's documents, data, and information.*
 11. *Carrying out other tasks relevant to the functions of the Audit Committee and assignments from the Board of Commissioners, including but not limited to holding Audit Committee Meetings.*
 12. *Financial Reports*
 - a. *Studying in depth the Bank's Work Plan and Budget;*
 - b. *Studying in depth the interim and annual Financial Reports, both audited and unaudited;*
 - c. *Studying in depth the work plan and budget realization report and examining items that have significant differences in figures/values;*
 - d. *Conducting regular meetings with related work units and external auditors who audit the Bank to request additional information and clarification in the fields of accounting and finance; and*
 - e. *Reporting periodically on the results of its monitoring and providing input on matters that need the attention of the Board of Commissioners.*
 13. *Internal Control:*
 - a. *Studying and ensuring that the Bank has a standard internal control system in accordance with applicable practices;*
 - b. *Studying in depth the audit reports of the SKAI and external auditors who examine the Bank to ensure that internal control has been implemented properly;*
 - c. *Conducting regular meetings with work units related to the internal control system and its implementation;*
 - d. *Monitoring and evaluating the implementation of the Board of Directors' follow-up on the findings of SKAI,*

SKAI, auditor eksternal, akuntan publik, dan hasil pengawasan Otoritas Jasa Keuangan; serta

- e. Melaporkan secara berkala atas hasil pemantauan dan evaluasi, dan memberi rekomendasi atau masukan atas hal-hal yang perlu menjadi perhatian Dewan Komisaris.

14. Kepatuhan:

Melakukan pemantauan dan evaluasi atas kepatuhan perusahaan terhadap peraturan internal dan peraturan Otoritas Jasa Keuangan serta peraturan lainnya yang terkait dengan usaha perbankan, antara lain:

- a. Mempelajari laporan hasil pemeriksaan yang terkait dengan kepatuhan terhadap peraturan internal dan eksternal yang dikeluarkan oleh SKAI dan Auditor Eksternal;
- b. Melakukan pemantauan dan evaluasi terhadap kesesuaian pelaksanaan audit oleh Kantor Akuntan Publik dengan standar audit yang berlaku;
- c. Melakukan pemantauan dan evaluasi terhadap kesesuaian laporan keuangan dengan standar akuntansi yang berlaku; dan
- d. Melaporkan secara berkala atas hasil pemantauannya dan memberi masukan atas hal-hal yang perlu menjadi perhatian Dewan Komisaris.

15. Audit Internal:

Melakukan pemantauan dan evaluasi terhadap efektivitas pelaksanaan fungsi audit intern Bank, antara lain:

- a. Melakukan evaluasi kinerja SKAI terhadap pelaksanaan audit tahunan dan memberikan rekomendasi kepada Dewan Komisaris terkait penyusunan rencana audit, ruang lingkup, dan anggaran SKAI;
- b. Mengevaluasi program dan cakupan audit dalam rangka pelaksanaan Rencana Kerja Tahunan SKAI;
- c. Melakukan evaluasi atas pelaksanaan audit oleh SKAI untuk memastikan bahwa program audit sudah berjalan dengan cakupan yang benar;
- d. Mempelajari secara mendalam semua temuan yang signifikan dari hasil pemeriksaan SKAI; *d*.
- e. Melakukan pertemuan berkala dengan SKAI guna membahas temuan-temuan Audit yang signifikan serta memberikan masukan yang dianggap perlu dalam pelaksanaan pemeriksaan oleh SKAI;
- f. Meminta bantuan SKAI untuk melakukan pemeriksaan/ investigasi khusus apabila terdapat temuan audit dan atau informasi yang berkaitan dengan pelanggaran hukum dan peraturan perundang-undangan yang berlaku;
- g. Melaporkan secara berkala atas hasil pemantauannya dan memberi masukan atas hal-hal yang perlu menjadi perhatian Dewan Komisaris;
- h. Meninjau Laporan Audit dan memastikan Direksi mengambil tindakan perbaikan yang diperlukan secara cepat untuk mengatasi kelemahan pengendalian, fraud, masalah kepatuhan terhadap kebijakan, undang-

external auditors, public accountants, and the results of supervision by the Financial Services Authority; and

- e. *Reporting periodically on the results of monitoring and evaluation, and providing recommendations or input on matters that need the attention of the Board of Commissioners.*

14. *Compliance:*

Monitoring and evaluating the company's compliance with internal regulations and regulations of the Financial Services Authority and other regulations related to banking businesses, including:

- a. *Studying the audit report related to compliance with internal and external regulations issued by SKAI and External Auditor;*
- b. *Monitoring and evaluating the conformity of the audit implementation by the Public Accounting Firm with applicable audit standards;*
- c. *Monitoring and evaluating the conformity of financial reports with applicable accounting standards; and*
- d. *Reporting periodically on the results of its monitoring and providing input on matters that need the attention of the Board of Commissioners.*

15. *Internal Audit:*

Monitoring and evaluating the effectiveness of the Bank's internal audit function, including:

- a. *Evaluating the performance of SKAI on the implementation of annual audits and providing recommendations to the Board of Commissioners regarding the preparation of SKAI audit plans, scope, and budgets;*
- b. *Evaluating the audit program and scope in the context of implementing the SKAI Annual Work Plan;*
- c. *Evaluating the implementation of audits by SKAI to ensure that the audit program is running with the correct scope;*
- d. *Studying in depth all significant findings from the results of SKAI's examinations;*
- e. *Conducting regular meetings with SKAI to discuss significant audit findings and provide input deemed necessary in the implementation of examinations by SKAI;*
- f. *Requesting assistance from SKAI to conduct special examinations/investigations if there are audit findings and/or information related to violations of applicable laws and regulations;*
- g. *Reporting periodically on the results of its monitoring and providing input on matters that need the attention of the Board of Commissioners;*
- h. *Reviewing the Audit Report and ensuring that the Board of Directors takes the necessary corrective actions promptly to address control weaknesses, fraud, compliance issues with policies, laws, and*

- undang, dan peraturan, atau masalah lain yang diidentifikasi dan dilaporkan oleh SKAI;
- i. Memastikan SKAI melakukan komunikasi dengan Direksi, Dewan Komisaris, Auditor Eksternal, dan Otoritas Jasa Keuangan (paling sedikit 1 kali dalam 1 tahun);
 - j. Memastikan SKAI bekerja secara independen dan objektif;
 - k. Memberikan rekomendasi kepada Dewan Komisaris terkait pemberian remunerasi tahunan SKAI secara keseluruhan serta penghargaan kinerja;
 - l. Memastikan SKAI menjunjung tinggi integritas dalam pelaksanaan tugas;
 - m. Memberikan rekomendasi atas Piagam Audit Internal;
 - n. Memberikan rekomendasi usulan kepada Dewan Komisaris atas penunjukan pengendali mutu independen dari pihak eksternal untuk melakukan kaji ulang terhadap kinerja SKAI; serta
 - o. Memastikan Bank wajib menyampaikan laporan kepada Otoritas Jasa Keuangan tentang pelaksanaan fungsi audit intern, yang terdiri atas:
 - Laporan pengangkatan atau pemberhentian Kepala Satuan Kerja Audit Internal;
 - Laporan khusus mengenai setiap temuan audit internal yang diperkirakan dapat membahayakan kelangsungan usaha Bank;
 - Laporan hasil kaji ulang pihak eksternal yang independen;
 - Laporan pelaksanaan dan pokok-pokok hasil audit internal; dan
 - Laporan lain atas permintaan Otoritas Jasa Keuangan.
16. Audit Eksternal:
- Dalam menyediakan informasi keuangan yang transparan dan berkualitas, Bank menggunakan penyelenggaraan fungsi audit eksternal oleh akuntan publik dan/atau kantor akuntan publik. Penggunaan dan penunjukan akuntan publik dan/atau kantor akuntan publik pada Bank sesuai dengan Peraturan Otoritas Jasa Keuangan mengenai penggunaan jasa akuntan publik dan kantor akuntan publik dalam kegiatan jasa keuangan melalui:
- a. Memberikan rekomendasi usulan penunjukan KAP dan/atau AP yang diajukan oleh Dewan Komisaris apabila RUPS telah mendelegasikan kewenangan penunjukan AP dan/atau KAP kepada Dewan Komisaris;
 - b. Dalam menyusun rekomendasi tersebut, Komite Audit dapat mempertimbangkan:
 - Independensi AP, KAP, dan orang dalam KAP dengan mempelajari nama dan/atau reputasi KAP yang akan diundang untuk mengikuti tender;
- regulations, or other issues identified and reported by the Internal Audit Unit;*
- i. *Ensuring that the Internal Audit Unit communicates with the Board of Directors, Board of Commissioners, External Auditor, and Financial Services Authority (at least once a year);*
 - j. *Ensuring that the Internal Audit Unit works independently and objectively;*
 - k. *Providing recommendations to the Board of Commissioners regarding the provision of the overall annual remuneration for the Internal Audit Unit and performance awards;*
 - l. *Ensuring that the Internal Audit Unit upholds integrity in carrying out its duties;*
 - m. *Providing recommendations on the Internal Audit Charter;*
 - n. *Providing recommendations to the Board of Commissioners regarding the appointment of an independent quality controller from an external party to conduct a review of the Internal Audit Unit's performance; and*
 - o. *Ensuring that the Bank is required to submit a report to the Financial Services Authority regarding the implementation of the internal audit function, consisting of:*
 - *Report on the appointment or dismissal of the Head of the Internal Audit Work Unit;*
 - *Special report on any internal audit findings that are estimated to endanger the Bank's business continuity;*
 - *Report on the results of independent external party reviews;*
 - *Report on the implementation and main results of internal audits; and*
 - *Other reports upon request from the Financial Services Authority.*
16. *External Audit:*
- In providing transparent and quality financial information, the Bank uses the implementation of external audit functions by public accountants and/or public accounting firms. The use and appointment of public accountants and/or public accounting firms at the Bank are in accordance with the Financial Services Authority Regulation regarding the use of public accountant services and public accounting firms in financial services activities through:*
- a. *Providing recommendations for the appointment of KAP and/or AP submitted by the Board of Commissioners if the GMS has delegated the authority to appoint AP and/or KAP to the Board of Commissioners;*
 - b. *In preparing these recommendations, the Audit Committee may consider:*
 - *Independence of AP, KAP, and people within KAP by studying the name and/or reputation of KAP that will be invited to participate in the tender;*



- Ruang lingkup audit dengan mempelajari perencanaan dan cakupan audit yang disampaikan KAP yang sudah dipilih/ditunjuk, guna memastikan bahwa perencanaan dan cakupan audit tersebut sesuai, serta sudah mempertimbangkan semua risiko yang dianggap penting;
 - Imbalan jasa audit;
 - Keahlian dan pengalaman AP, KAP, dan Tim Audit dari KAP;
 - Metodologi, teknik, dan sarana audit yang digunakan KAP;
 - Manfaat sudut pandang baru yang akan diperoleh melalui penggantian AP, KAP, dan Tim Audit dari KAP;
 - Potensi risiko atas penggunaan jasa audit oleh KAP yang sama secara berturut-turut untuk kurun waktu yang cukup panjang; dan/atau
 - Hasil evaluasi terhadap pelaksanaan pemberian jasa audit atas informasi keuangan historis tahunan oleh AP dan KAP pada periode sebelumnya, jika ada.
- c. Mempelajari dan memastikan bahwa proses pelaksanaan pemilihan KAP dan/atau AP sudah berjalan dengan benar sesuai dengan tata cara yang baku;
- d. Melakukan evaluasi terhadap pelaksanaan pemberian jasa audit atas informasi keuangan historis tahunan oleh AP dan/atau KAP kepada Dewan Komisaris yang mencakup:
- Kesesuaian pelaksanaan audit oleh AP dan/atau KAP dengan standar audit yang berlaku;
 - Kecukupan waktu pekerjaan lapangan;
 - Pengkajian cakupan jasa yang diberikan dan kecukupan uji petik; dan
 - Rekomendasi perbaikan yang diberikan oleh AP dan/atau KAP.
- e. Melakukan komunikasi secara berkala dengan KAP yang sedang memeriksa Bank, antara lain sebagai berikut:
- Progres pelaksanaan pemeriksaan;
 - Temuan-temuan penting;
 - Perubahan peraturan/ketentuan dalam pencatatan akuntansi dan keuangan dari institusi yang berwenang;
 - Penyesuaian-penyesuaian yang terjadi berdasarkan hasil pemeriksaan; serta
 - Kendala/hambatan yang dijumpai dalam pelaksanaan pemeriksaan.
- f. Mempelajari secara mendalam semua temuan yang signifikan dari hasil pemeriksaan auditor ekstern serta institusi pemeriksa lainnya.
- g. Melakukan pemantauan dan evaluasi atas tindaklanjut auditee terhadap hasil pemeriksaan yang dilakukan oleh auditor eksternal.

- *Scope of the audit by studying the audit planning and scope submitted by the KAP that has been selected/appointed, to ensure that the audit planning and scope are appropriate, and have considered all risks that are considered important;*
 - *Audit service fees;*
 - *Expertise and experience of AP, KAP, and Audit Team from KAP;*
 - *Audit methodology, techniques, and means used by the KAP;*
 - *Benefits of new perspectives to be gained through the replacement of AP, KAP, and Audit Team from KAP;*
 - *Potential risks of using audit services by the same KAP consecutively for a sufficiently long period of time; and/or*
 - *Results of evaluation of the implementation of the provision of audit services on annual historical financial information by AP and KAP in the previous period, if any.*
- c. *Studying and ensuring that the process of selecting KAP and/or AP has been carried out correctly in accordance with standard procedures;*
- d. *Conducting an evaluation of the implementation of the provision of audit services on annual historical financial information by AP and/or KAP to the Board of Commissioners which includes:*
- *Compliance of the implementation of the audit by AP and/or KAP with applicable audit standards;*
 - *Adequacy of fieldwork time;*
 - *Assessment of the scope of services provided and the adequacy of random testing; and*
 - *Recommendations for improvement provided by AP and/or KAP.*
- e. *Conducting regular communication with the KAP that is auditing the Bank, including the following:*
- *Progress of the audit implementation;*
 - *Important findings;*
 - *Changes in regulations/provisions in accounting and financial records from authorized institutions;*
 - *Adjustments that occur based on the audit results; and*
 - *Obstacles/barriers encountered in the audit implementation.*
- f. *Studying in depth all significant findings from the audit results of external auditors and other audit institutions.*
- g. *Monitoring and evaluating the auditee's follow-up to the audit results conducted by the external auditor.*

- h. Melaporkan secara berkala atas hasil pemantauannya dan memberikan masukan atas hal-hal yang perlu menjadi perhatian Dewan Komisaris.

- h. Reporting periodically on the results of its monitoring and providing input on matters that need the attention of the Board of Commissioners.*

Sementara itu, Komite Audit mempunyai wewenang sebagai berikut:

1. Mengakses dokumen, data, informasi Bank tentang karyawan, dana, aset, dan sumber daya Bank yang diperlukan.
2. Melakukan koordinasi dan berkomunikasi langsung dan/atau memanggil dalam rapat dengan karyawan, manajemen, termasuk Direksi terkait tugas dan tanggung jawab Komite Audit.
3. Jika diperlukan, dapat melibatkan pihak independen di luar anggota Komite Audit yang diperlukan untuk membantu pelaksanaan tugas Komite Audit.
4. Melaksanakan kewenangan lain yang diberikan oleh Dewan Komisaris, sesuai dengan ketentuan peraturan perundang-undangan.

Meanwhile, the Audit Committee has the following authorities:

1. Accessing documents, data, Bank information about employees, funds, assets, and Bank resources as needed.
2. Coordinating and communicating directly and/or calling in meetings with employees, management, including the Board of Directors regarding the duties and responsibilities of the Audit Committee.
3. If necessary, may involve independent parties outside the Audit Committee members as needed to assist in carrying out the duties of the Audit Committee.
4. Carry out other authorities granted by the Board of Commissioners, in accordance with the provisions of laws and regulations.

Independensi Komite

Anggota Komite Audit berkomitmen untuk mengutamakan sikap independensi, berlaku objektif, dan penuh kehati-hatian dalam pelaksanaan tugas dan tanggung jawabnya. Selain itu, komite ini senantiasa memastikan tidak memiliki benturan kepentingan dengan organ Bank lainnya dan tidak menerima intervensi dari para Pemegang Saham. Komitmen tersebut tercermin dalam pemenuhan aspek independensi sebagai berikut:

Independency of the Committee

The members of the Audit Committee are committed to prioritizing independence and acting objectively and prudentially in carrying out their duties and responsibilities. In addition, this committee always ensures that it does not have a conflict of interest with other Bank organs and does not receive intervention from Shareholders. This commitment is reflected in the fulfillment of the following aspects of independence.

Aspek Independensi <i>Independence Aspect</i>	Anggar Budhi Nuraini	Juwono Akuan Rokanta	Muhammad Rizaldy
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. <i>Does not have financial relationship with the Board of Commissioners and Board of Directors.</i>	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. <i>Does not have management relationship with Shareholders, Subsidiaries, and affiliated companies.</i>	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. <i>Does not have share ownership relationship in the Bank.</i>	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Audit. <i>Does not have family relationship with the Board of Commissioners, Board of Directors, and/or among members of the Audit Committee.</i>	v	v	v

Sertifikasi Profesi Anggota Komite

Bank Sahabat Sampoerna berupaya untuk memastikan seluruh anggota Komite yang dimiliki telah memiliki kualifikasi dan kompetensi yang memadai dalam melaksanakan fungsi dan tugasnya. Untuk itu, Bank mendorong dan memfasilitasi seluruh anggota Komite Audit untuk mengikuti program sertifikasi sehingga dapat memastikan kapabilitas yang dimiliki tetap optimal sesuai dengan ketentuan yang berlaku. Adapun sertifikasi yang telah dimiliki oleh Komite Audit Bank hingga tahun 2024 disajikan sebagai berikut:

Professional Certification of Committee Members

Bank Sahabat Sampoerna strives to ensure that all members of the Committee have adequate qualifications and competencies in carrying out their functions and duties. To that end, the Bank encourages and facilitates all members of the Audit Committee to participate in the certification program so that they can ensure that their capabilities remain optimal in accordance with applicable provisions. The certifications that have been held by the Bank's Audit Committee until 2024 are presented as follows:

No.	Sertifikasi <i>Certification</i>	Jumlah (orang) <i>Total (persons)</i>
1.	Sertifikasi Manajemen Risiko Jenjang 4 <i>Risk Management Certification Level 4</i>	1
2.	Sertifikasi Manajemen Risiko Jenjang 7 <i>Risk Management Certification Level 7</i>	1
3.	Sertifikasi Manajemen Risiko Jenjang 6 <i>Risk Management Certification Level 6</i>	1

Pelaksanaan Rapat Komite

Komite Audit wajib menyelenggarakan rapat sekurang-kurangnya sebanyak 1 (satu) kali dalam 1 (satu) bulan. Sepanjang tahun 2024, Komite Audit telah menyelenggarakan 18 (delapan belas) kali rapat internal secara daring dan luring. Frekuensi kehadiran dan agenda rapat Komite Audit di tahun 2024 dapat dilihat sebagai berikut:

Implementation of Committee Meetings

The Audit Committee is required to hold meetings at least 1 (one) time in 1 (one) month. Throughout 2024, the Audit Committee has held 18 (eighteen) internal meetings online and offline. The frequency of attendance and agenda of the Audit Committee meetings in 2024 can be seen as follows:

Nama <i>Name</i>	Jabatan <i>Position</i>	Total Rapat <i>Total Meetings</i>	Kehadiran <i>Attendances</i>	Persentase <i>Percentage (%)</i>
Anggar Budhi Nuraini	Ketua Chairperson	18	17	94%
Juwono Akuan Rokanta	Anggota Member	18	17	94%
Muhammad Rizaldy	Anggota Member	18	17	94%
Rata-Rata <i>Average</i>				94%

No	Tanggal <i>Date</i>	Agenda <i>Agenda</i>	Kehadiran <i>Attendance</i>		
			ABN	JAR	MR
1	23 Januari <i>January 23</i>	<ul style="list-style-type: none"> Update review pengalihan aset Update temuan OJK Laporan Hasil Pemeriksaan audit Update on asset transfer review Update on OJK findings Audit report 	v	v	v
2	19 Februari <i>February 19</i>	<ul style="list-style-type: none"> Hasil pemeriksaan laporan keuangan BSS Matters arising Realisasi audit plan dan budget Issue tracking OJK Laporan hasil pemeriksaan Laporan validasi trigger BSS financial report audit results Matters arising Audit plan and budget realization OJK issue tracking Audit report Trigger validation report 	v	v	v
3	19 Maret <i>March 19</i>	<ul style="list-style-type: none"> Matters arising Realisasi audit plan per 15 Maret 2024 Issue tracking OJK Laporan Hasil Pemeriksaan audit Update hasil pre-test pemahaman cabang terhadap SOP Matters arising Audit plan realization as of March 15, 2024 OJK issue tracking Audit report Update on pre-test results of branch understanding of SOP 	v	v	v
4	22 Maret <i>March 22</i>	<ul style="list-style-type: none"> Rapat koordinasi dengan KAP Coordination meeting with KAP 	v	v	v

No	Tanggal Date	Agenda Agenda	Kehadiran Attendance		
			ABN	JAR	MR
6	26 April April 26	<ul style="list-style-type: none"> Matters arising Realisasi audit plan Issue tracking OJK Laporan hasil pemeriksaan Coordination meeting with KAP Matters arising Audit plan realization OJK issue tracking Audit report 	v	v	v
6	2 Mei May 2	<ul style="list-style-type: none"> Persetujuan publikasi laporan keuangan maret 2024 Laporan posisi keuangan Laporan laba rugi komprehensif Rasio keuangan Approval of March 2024 financial report publication Financial position report Comprehensive income statement Financial ratios 	v	x	v
7	21 Mei May 21	<ul style="list-style-type: none"> Matters arising Realisasi audit plan Issue tracking OJK Laporan hasil pemeriksaan Matters arising Audit plan realization OJK issue tracking Audit report 	v	v	v
8	25 Juni June 25	<ul style="list-style-type: none"> Matters arising Realisasi audit plan Issue tracking OJK Laporan hasil pemeriksaan Matters arising Audit plan realization OJK issue tracking Audit report 	v	v	v
9	23 Juli July 23	<ul style="list-style-type: none"> Matters arising Realisasi audit plan Issue tracking OJK Laporan hasil pemeriksaan Update perubahan metodologi offsite dan continuous audit Matters arising Audit plan realization OJK issue tracking Audit report Update on changes to the offsite methodology and continuous audit 	v	v	v
10	29 Juli July 29	<ul style="list-style-type: none"> Update QA Review Persetujuan publikasi laporan keuangan Juni 2024 Laporan posisi keuangan Laporan laba rugi komprehensif Rasio keuangan QA Review Update Approval of June 2024 financial report publication Financial position report Comprehensive income statement Financial ratios 	v	v	x
110	9 Agustus August 9	<ul style="list-style-type: none"> Matters arising Realisasi audit plan Issue tracking OJK Laporan hasil pemeriksaan Matters arising Audit plan realization OJK issue tracking Audit result report 	v	v	v

No	Tanggal Date	Agenda Agenda	Kehadiran Attendance		
			ABN	JAR	MR
12	17 September September 17	<ul style="list-style-type: none"> Matters arising Realisasi audit plan Issue tracking OJK Laporan hasil pemeriksaan Matters arising Audit plan realization OJK issue tracking Audit result report 	v	v	v
13	22 Oktober October 22	<ul style="list-style-type: none"> Matters arising Realisasi audit plan Issue tracking OJK Laporan hasil pemeriksaan Matters arising Audit plan realization OJK issue tracking Audit result report 	v	v	v
14	19 Nopember November 19	<ul style="list-style-type: none"> Matters arising Realisasi audit plan Issue tracking OJK Laporan hasil pemeriksaan Analisa SLA Pelaksanaan Audit Risk Assesment dan Audit Plan tahun 2025 Matters arising Audit plan realization OJK issue tracking Audit result report Audit Implementation SLA Analysis Risk Assessment and Audit Plan for 2025 	v	v	v
15	11 Desember December 11	<ul style="list-style-type: none"> Anti Fraud Ecosystem Fraud Monitoring Tahun 2022-2024 Anti Fraud Ecosystem Fraud Monitoring for 2022-2024 	x	v	v
16	13 Desember December 13	<ul style="list-style-type: none"> Laporan hasil pemeriksaan Audit result report 	v	v	v
17	18 Desember December 18	<ul style="list-style-type: none"> Matters arising Realisasi audit plan Issue tracking OJK Laporan hasil pemeriksaan Matters arising Audit plan realization OJK issue tracking Audit result report 	v	v	v
18	27 Desember December 27	<ul style="list-style-type: none"> Update progress pemeriksaan laporan keuangan BSS Laporan hasil pemeriksaan Update on BSS financial report audit progress Audit result report 	v	v	v
Jumlah Kehadiran Total Attendance			17	17	17

Keterangan : Description:
 ABN : Anggar Budhi Nuraini
 JAR : Juwono Akuan Rokanta
 MR : Muhammad Rizaldy

Pengembangan Kompetensi

Bank Sahabat Sampoerna senantiasa memfasilitasi Komite Audit untuk mengikuti kegiatan pengembangan kompetensi untuk memperluas pemahaman mengenai pelaksanaan tugas dan tanggung jawabnya. Sepanjang tahun 2024, Komite Audit telah mengikuti sejumlah kegiatan pengembangan kompetensi yang diungkapkan sebagai berikut:

Competency Development

Bank Sahabat Sampoerna always facilitates the Audit Committee to participate in competency development activities to broaden their understanding of the implementation of their duties and responsibilities. Throughout 2024, the Audit Committee has participated in a number of competency development activities as disclosed as follows:

Nama Name	Jabatan Position	Topik Pelatihan Training Topic	Penyelenggara Organizer	Tanggal Pelatihan Training Date
Anggar Budhi Nuraini	Ketua Chairperson	Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 6 <i>Risk Management Certification Briefing & Exam Level 6</i>	Garda	11 Januari January 11
Juwono Akuan Rokanta	Anggota Member	Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 <i>Risk Management Certification Briefing & Exam Level 7</i>	Garda	7 Oktober October 7
Muhammad Rizaldy	Anggota Member	Webinar Artificial Intelligence Changes The Face of The Financial Sector Confirmation <i>Artificial Intelligence Changes The Face of The Financial Sector Confirmation Webinar</i>	OJK	7 Maret March 7

Tanggung Jawab Komite Audit dalam Pemberian Rekomendasi atas Penunjukan dan Pemberhentian Auditor Eksternal

Di tahun 2024, Komite Audit telah mengevaluasi dan memberikan rekomendasi terkait penunjukan KAP Tanubrata Sutanto Fahmi Bambang & Rekan (BDO International) dengan kesimpulan sebagai berikut:

Audit Committee Responsibilities in Providing Recommendations on the Appointment and Dismissal of External Auditors

In 2024, the Audit Committee has evaluated and provided recommendations regarding the appointment of KAP Tanubrata Sutanto Fahmi Bambang & Rekan (BDO International) with the following conclusions:

Independensi AP, KAP, dan Orang dalam KAP <i>Independence of AP, KAP, and People in KAP</i>	AP, KAP, maupun orang dalam KAP tidak memiliki hubungan terkait baik dengan Bank Sahabat Sampoerna (BSS) maupun manajemen BSS. Penilaian independensi telah dilakukan dan akan diterbitkannya Surat Pernyataan Independensi dari KAP <i>AP, KAP, or any person within KAP has no related relationship with Bank Sahabat Sampoerna (BSS) or BSS management. An independence assessment has been conducted and a Statement of Independence from KAP will be issued</i>
Ruang Lingkup Audit <i>Audit Scope</i>	Ruang lingkup audit sesuai dengan standar audit yang berlaku dan ketentuan/ regulasi (POJK/ SEOJK) yang berlaku <i>The scope of the audit is in accordance with applicable audit standards and applicable provisions/regulations (POJK/SEOJK)</i>
Imbalan Jasa Audit <i>Audit Fees</i>	Biaya pelaksanaan audit tahun 2024 adalah sebesar Rp550.000.000,- (lima ratus lima puluh juta rupiah) belum termasuk PPN 11%. Biaya tersebut diluar biaya-biaya terkait penugasan di luar kota, perusahaan akan menyediakan transportasi dan akomodasi sesuai dengan standar yang berlaku di perusahaan. Penambahan buku laporan audit independen dikenakan penggantian biaya cetak sebesar Rp750.000,- (tujuh ratus lima puluh ribu rupiah). <i>The cost of implementing the audit in 2024 is Rp550,000,000 (five hundred and fifty million rupiah) excluding 11% VAT.</i> <i>This cost is excluding costs related to assignments outside the city, the company will provide transportation and accommodation in accordance with the standards applicable in the company.</i> <i>The addition of an independent audit report book is subject to a printing fee of Rp750,000 (seven hundred and fifty thousand rupiah).</i>
Keahlian dan Pengalaman AP, KAP, dan Tim Audit dari KAP <i>Expertise and Experience of AP, KAP, and Audit Team from KAP</i>	KAP Tanubrata Sutanto Fahmi Bambang & Rekan (BDO) memiliki keahlian dan pengalaman serta independen dan profesional dalam setiap penugasan dan memahami Standar Akuntansi Keuangan (SAK) terbaru sebagai konvergensi terhadap International Financial Reporting Standard (IFRS). Disamping itu, KAP memiliki pengalaman untuk audit di bidang perbankan. <i>KAP Tanubrata Sutanto Fahmi Bambang & Rekan (BDO) has expertise and experience as well as being independent and professional in every assignment and understands the latest Financial Accounting Standards (SAK) as a convergence to the International Financial Reporting Standard (IFRS). In addition, KAP has experience in auditing in the banking sector.</i>
Metodologi, Teknik, dan Sarana Audit yang Digunakan KAP <i>Audit Methodology, Techniques, and Tools Used by KAP</i>	KAP Tanubrata Sutanto Fahmi Bambang & Rekan (BDO) akan melakukan beberapa prosedur dalam hal pemeriksaan akun-akun yang signifikan antara lain : 1. Planning the audit (high level review atas laporan keuangan, mendiskusikan dan melakukan presentasi terkait rencana audit). 2. Field Work (melakukan testing and assessment atas kontrol dan sistem manajemen dan mengunjungi sample cabang). 3. Final Visit (menangani masalah yang belum terselesaikan, pengendalian internal dan diskusi dengan Manajemen terkait issue yang ada). 4. Audit Completion (mendiskusikan improvement untuk tahun buku selanjutnya). <i>KAP Tanubrata Sutanto Fahmi Bambang & Rekan (BDO) will carry out several procedures in terms of examining significant accounts, including:</i> 1. <i>Planning the audit (high-level review of financial statements, discussing and making presentations related to the audit plan).</i> 2. <i>Field Work (conducting testing and assessment of controls and management systems and visiting sample branches).</i> 3. <i>Final Visit (handling unresolved issues, internal controls and discussions with Management regarding existing issues).</i> 4. <i>Audit Completion (discussing improvements for the next fiscal year).</i>

<p>Manfaat Fresh Eye Perspectives yang akan Diperoleh melalui Pergantian AP, KAP, dan Tim Audit dari KAP</p> <p><i>Benefits of Fresh Eye Perspectives to be Obtained through Replacement of AP, KAP, and Audit Team from KAP</i></p>	<p>Tim Audit dari KAP telah memenuhi ketentuan audit dari OJK untuk melakukan rotasi dalam melaksanakan jasa auditnya agar selalu memperoleh manfaat fresh eye perspectives.</p> <p>Bank telah menggunakan KAP yang sama (KAP BDO memasuki tahun kelima) dan tahun ini merupakan tahun ke 3 (tiga) untuk Akuntan Publik yang bertanggungjawab atas audit laporan keuangan beserta tim Audit yaitu Bapak Sutomo, dimana sebelumnya Bank pernah menggunakan jasa Akuntan Publik Pak Sutomo (untuk tahun 2020 dan 2021).</p> <p><i>The Audit Team from KAP has fulfilled the audit requirements of the OJK to rotate in carrying out its audit services in order to always obtain the benefits of fresh eye perspectives.</i></p> <p><i>The Bank has been using the same KAP (KAP BDO is entering its fifth year) and this year is the 3rd (third) year for the Public Accountant responsible for the audit of the financial statements and the Audit team, namely Mr. Sutomo, where previously the Bank had used the services of Public Accountant Mr. Sutomo (for 2020 and 2021).</i></p>
<p>Potensi Risiko atas Penggunaan Jasa Audit oleh KAP yang sama Secara Berturut-turut untuk Kurun Waktu yang Cukup Panjang</p> <p><i>Potential Risks of Using Audit Services by the Same KAP Consecutively for a Sufficiently Long Period of Time</i></p>	<p>Pemeriksaan (Audit) KAP BDO adalah tahun ke 5 (lima) untuk tahun buku 2024, dan Akuntan Publik yang bertanggung jawab, Bapak Sutomo yang terdaftar di OJK dengan nomor Register AP.0007, merupakan tahun ke 3 (tiga), hal ini masih sesuai dengan ketentuan POJK Nomor 9 Tahun 2023 Tentang Penggunaan Jasa Akuntan Publik Dan Kantor Akuntan Publik Dalam Kegiatan Jasa Keuangan</p> <p><i>The Audit of KAP BDO is the 5th (fifth) year for the 2024 financial year, and the Public Accountant in charge, Mr. Sutomo who is registered with the OJK with the Registration number AP.0007, is the 3rd (third) year, this is still in accordance with the provisions of POJK Number 9 of 2023 concerning the Use of Public Accountant Services and Public Accounting Firms in Financial Services Activities</i></p>
<p>Hasil Evaluasi terhadap Pelaksanaan Pemberian Jasa Audit atas Informasi Keuangan Historis Tahunan oleh AP dan KAP pada Periode Sebelumnya</p> <p><i>Evaluation Results of the Implementation of Audit Services for Annual Historical Financial Information by AP and KAP in the Previous Period</i></p>	<p>Sesuai dengan memo internal No. 001/BSS/KA/VI/2024 tanggal 21 Juni 2024 perihal Laporan Hasil Evaluasi Komite Audit terhadap Pelaksanaan Pemberian Jasa Audit oleh AP dan/ atau KAP Tahun Buku 2023, dengan hasil evaluasi sebagai berikut :</p> <ol style="list-style-type: none"> 1. Pelaksanaan sejauh yang kami ketahui dan pahami telah sesuai dengan Standar Akuntansi Keuangan di Indonesia, Standar Audit yang berlaku oleh IAPI, dan peraturan regulasi yang relevan seperti POJK dan SEOJK yang berlaku. 2. Pelaksanaan pemeriksaan oleh KAP BDO dinilai telah cukup sesuai timeline dengan ketepatan waktu penyelesaian. 3. Ruang lingkup audit minimum dan uji petik telah cukup mengakomodasi ketentuan OJK, hal-hal lain yang ditentukan berdasarkan hasil komunikasi KAP dengan OJK dan hal-hal yang diatur dalam SAK dan PAPI. 4. Rekomendasi perbaikan yang disampaikan melalui Management Letter tahun 2023 telah ditanggapi dan ditindaklanjuti oleh Manajemen Bank. 5. Komite Audit menilai bahwa kecukupan CKPN untuk periode mendatang perlu dilihat kembali lebih mendalam. <p><i>In accordance with internal memo No. 001/BSS/KA/VI/2024 dated June 21, 2024 concerning the Audit Committee Evaluation Results Report on the Implementation of Audit Services by AP and/or KAP for the 2023 Financial Year, with the following evaluation results:</i></p> <ol style="list-style-type: none"> 1. <i>The implementation as far as we know and understand has been in accordance with the Financial Accounting Standards in Indonesia, the applicable Audit Standards by IAPI, and relevant regulations such as the applicable POJK and SEOJK.</i> 2. <i>The implementation of the audit by KAP BDO is considered to be quite in accordance with the timeline with the punctuality of completion.</i> 3. <i>The scope of the minimum audit and random testing has sufficiently accommodated the provisions of the OJK, other matters determined based on the results of communication between the KAP and the OJK and matters regulated in the SAK and PAPI.</i> 4. <i>Recommendations for improvement submitted through the 2023 Management Letter have been responded to and followed up by the Bank's Management.</i> 5. <i>The Audit Committee considers that the adequacy of CKPN for the coming period needs to be reviewed in more depth.</i>

Mekanisme Pengangkatan dan Pemberhentian Ketua Komite Audit

Proses pengangkatan dan pemberhentian Ketua Komite Audit Bank mengacu pada Keputusan Dewan Komisaris. Pihak yang ditunjuk sebagai Ketua Komite Audit merupakan Komisaris Independen yang telah memenuhi syarat dan kriteria yang berlaku. Adapun masa jabatan Ketua Komite Audit ditetapkan selama 2 tahun atau lebih, akan tetapi tidak melebihi masa jabatan anggota Dewan Komisaris. Sementara, pengangkatan kembali Ketua Komite Audit ditentukan berdasarkan hasil penilaian dari Dewan Komisaris.

Mechanism for Appointment and Dismissal of the Chairman of the Audit Committee

The process of appointment and dismissal of the Chairman of the Bank's Audit Committee refers to the Decision of the Board of Commissioners. The party appointed as the Chairman of the Audit Committee is an Independent Commissioner who has met the applicable requirements and criteria. The term of office of the Chairman of the Audit Committee is set for 2 years or more, but does not exceed the term of office of the members of the Board of Commissioners. Meanwhile, the reappointment of the Chairman of the Audit Committee is determined based on the results of the assessment by the Board of Commissioners.

Remunerasi

Anggota Komite Audit yang bukan bagian dari anggota Dewan Komisaris menerima remunerasi sesuai dengan kebijakan Bank dan disesuaikan dengan kondisi bisnis terkini.

Remuneration

Members of the Audit Committee who are not part of the Board of Commissioners receive remuneration in accordance with the Bank's policy and adjusted to the latest business conditions.

Pelaksanaan Tugas Komite di Tahun 2024

Sepanjang tahun 2024, Komite Audit telah melaksanakan tugas dan tanggung jawabnya, antara lain:

Implementation of Duties by the Committee in 2024

Throughout 2024, the Audit Committee has carried out its duties and responsibilities, including:

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
<p>Memantau dan mengevaluasi pelaksanaan tugas SKAI. <i>Monitoring and evaluating the duties of the Internal Audit Division</i></p>	<ul style="list-style-type: none"> • Dalam proses penyusunan rencana kerja, Komite Audit telah melakukan evaluasi atas pengajuan dan memberikan rekomendasi sbb : • In the process of formulating the work plan, the Audit Committee has conducted an evaluation of the submissions and provided the following recommendations: • Mengevaluasi rencana audit tahun, ruang lingkup dan anggaran SKAI, serta memberikan rekomendasi kepada Dewan Komisaris; • Memastikan tidak ada batasan yang diberlakukan Manajemen pada proses audit, termasuk kebutuhan sumber daya; • Meminta SKAI untuk melakukan audit khusus terkait kasus penyimpangan terhadap hukum dan peraturan, serta indikasi fraud, atau pendalaman atas temuan yang berisiko tinggi; • Memantau pelaksanaan / realisasi rencana kerja audit dalam setiap pelaksanaan rapat komite audit yang dilaksanakan minimal 1 kali dalam sebulan; • Memantau pelaksanaan tindak lanjut oleh Direksi atas hasil temuan SKAI dan Otoritas Jasa Keuangan; dan • Memeriksa kesesuaian Laporan Keuangan dengan standar akuntansi yang berlaku. • <i>Evaluating the annual audit plan, scope, and budget of the Internal Audit Division, as well as providing recommendations to the Board of Commissioners.</i> • <i>Ensuring that there are no restrictions imposed by the Management on the audit process, including on resources required.</i> • <i>Requesting the Internal Audit Division to conduct special audits related to cases of legal and regulatory violations, fraud, and/or thorough investigations of high-risk findings.</i> • <i>Monitoring the implementation of follow-up by the Board of Directors on the Internal Audit Division's and the Financial Services Authority's findings.</i> • <i>Ensuring the conformity of the Financial Statements with the applicable accounting standards.</i>
<p>Memantau dan mengevaluasi pelaksanaan tugas kantor akuntan publik (KAP) terhadap pelaksanaan pemberian jasa audit Laporan Keuangan Bank. <i>Monitoring and evaluating the implementation of duties of the public accounting firm (KAP) on the provision of audit services for the Bank's Financial Statements.</i></p>	<ul style="list-style-type: none"> • Memeriksa kesesuaian pelaksanaan audit oleh KAP dengan standar audit yang berlaku; • Memastikan kecukupan waktu pengerjaan lapangan; • Melakukan pengkajian cakupan jasa yang diberikan dan kecukupan uji petik; • Memantau pelaksanaan tindak lanjut oleh Direksi atas hasil temuan KAP; • Secara umum Komite Audit telah mengevaluasi atas hasil audit laporan keuangan oleh KAP yang dinilai telah berjalan dengan efektif dan objektif; serta • Menyampaikan Laporan Hasil Evaluasi Komite Audit terhadap Pelaksanaan Pemberian Jasa Audit Tahun Buku 2023 kepada Dewan Komisaris untuk selanjutnya disampaikan kepada Otoritas Jasa Keuangan pada tanggal 25 Juni 2024. • <i>Examining the conformity of the audit conducted by KAP with the applicable auditing standards.</i> • <i>Ensuring adequate time for fieldwork.</i> • <i>Reviewing the scope of services provided and the adequacy of sampling test.</i> • <i>Monitoring the implementation of follow-ups by the Board of Directors on KAP findings.</i> • <i>Generally, the Audit Committee has evaluated the results of the Financial Statement audit by the KAP, which is considered to have been conducted effectively and objectively. In this audit, there were no material dissenting opinions between the Board of Directors and the accountant.</i> • <i>Submitting the Audit Committee Evaluation Result Report on the Implementation of the Provision of Audit Services for the 2022 Financial Year to the Board of Commissioners for further submission to the Financial Services Authority on 25 June 2024.</i>
<p>Memberikan rekomendasi kepada Dewan Komisaris mengenai penunjukan KAP untuk melakukan jasa audit Laporan Keuangan Bank. <i>Providing recommendations to the Board of Commissioners on the appointment of KAP to provide audit services of the Bank's Financial Statements.</i></p>	<ul style="list-style-type: none"> • Merekomendasikan penunjukan KAP Tanubrata, Sutanto, Fahmi, Bambang & Rekan, anggota jaringan BDO International Limited (KAP BDO) untuk melakukan audit Laporan Keuangan tahun 2024 yang didasarkan pada independensi, ruang lingkup penugasan, keahlian/pengalaman, teknik audit, dan biaya untuk selanjutnya disampaikan kepada Dewan Komisaris; serta • Menyampaikan rekomendasi dalam penunjukan KAP BDO untuk jasa audit tahun buku 2024 kepada Dewan Komisaris untuk selanjutnya dilaporkan kepada Otoritas Jasa Keuangan melalui Aplikasi Pelaporan Online (APOLO) pada tanggal 28 Oktober 2024. • <i>Recommending the appointment of KAP Tanubrata, Sutanto, Fahmi, Bambang & Rekan, a member firm of BDO International Limited (KAP BDO), to conduct an audit of the 2023 Financial Statements based on independence, assignment scope, expertise/experience, audit techniques, and fees for further submission to the Board of Commissioners.</i> • <i>Providing recommendations on the appointment of KAP BDO to provide audit services for the 2023 financial year to the Board of Commissioners, to subsequently be conveyed to the Financial Services Authority on 30 August 2023 and reported to the Financial Services Authority through Management System for Official Documents and Archives (SIPENA) on 28 October 2023.</i>

Rekomendasi

Berdasarkan pelaksanaan tugas sepanjang tahun 2024, Komite Audit telah menyampaikan rekomendasi terkait pengelolaan Bank, yang diungkapkan sebagai berikut:

Recommendation

Based on the implementation of duties throughout 2024, the Audit Committee has submitted recommendations regarding the management of the Bank, which are described as follows:

<p>Perkreditan <i>Credit</i></p>	<ul style="list-style-type: none"> • Melakukan kajian menyeluruh terhadap laporan keuangan debitur untuk memastikan akurasi dan validitas, terutama pada laporan yang tidak diaudit. • Melakukan pengecekan terhadap debitur besar BSS yang memiliki fasilitas di bank lain untuk memastikan penerapan prinsip one obligor concept. • Melakukan kajian terhadap isu atau berita terkait industri Fintech, dengan fokus pada peningkatan risiko yang dihadapi, termasuk regulasi yang berlaku pada perusahaan Fintech, terutama terkait dengan mekanisme Write Off (WO). • SKAI secara konsisten melakukan pengujian terhadap informasi trade checking untuk memastikan reputasi dari bouwheer debitur. • Unit kerja Credit Admin mengambil peran sebagai kontrol kedua dalam memastikan pemenuhan hasil uji kepatuhan terhadap debitur dengan fasilitas diatas Rp10 miliar. • Perlu menetapkan batasan (capping) pada portofolio AB termasuk pada standar suku bunga yang ditetapkan. • <i>Conduct a comprehensive review of the debtor's financial statements to ensure accuracy and validity, especially on unaudited reports.</i> • <i>Conduct checks on large BSS debtors who have facilities at other banks to ensure the implementation of the one obligor concept.</i> • <i>Conduct studies on issues or news related to the Fintech industry, with a focus on increasing risks faced, including regulations applicable to Fintech companies, especially related to the Write Off (WO) mechanism.</i> • <i>SKAI consistently tests trade checking information to ensure the reputation of the debtor's bouwheer.</i> • <i>The Credit Admin work unit takes on the role of second control in ensuring the fulfillment of compliance test results for debtors with facilities above Rp10 billion.</i> • <i>Need to set limits (capping) on the AB portfolio including the interest rate standards set.</i>
<p>Operasional <i>Operational</i></p>	<ul style="list-style-type: none"> • Pelaporan risk event oleh Risk Taking Unit kepada SKMR harus dilakukan secara lebih konsisten dan dimonitor oleh tim Ops Risk untuk memastikan tindakan perbaikan yang tepat dapat segera dilakukan. • Data atau file yang bersifat kritikal atau rahasia harus dicadangkan secara teratur dan dikelola dengan baik agar tidak bergantung pada satu individu. • Pengkinian SOP yang mencakup kewajiban site visit ke vendor, pemeriksaan stock opname kartu ATM di lokasi vendor, dan kontrol atas pengelolaan serta pengiriman kartu ATM. • Perlu ditetapkan ketentuan mengenai batas waktu internalisasi terhadap POJK baru. • Analisis lebih mendalam perlu dilakukan terhadap potensi risiko likuiditas yang dapat timbul jika salah satu deposan besar menarik dananya dan berdampak pada deposan lain dalam satu grup. • Kelengkapan dan kesiapan infrastruktur Cabang Bank Devisa sudah dipastikan tuntas sebelum diperluas ke cabang-cabang lainnya. • Terhadap seluruh kerjasama bisnis dengan Mitra, untuk dipastikan terkait perizinan dan persetujuan dari OJK/regulator telah diperoleh, mencakup izin usaha mitra, izin kerjasama dengan mitra, dan produk layanan yang terkait, termasuk terkait penyedia jasa layanan TI yang terlibat. • <i>Risk event reporting by the Risk Taking Unit to SKMR must be carried out more consistently and monitored by the Ops Risk team to ensure that appropriate corrective actions can be taken immediately.</i> • <i>Critical or confidential data or files must be backed up regularly and managed properly so as not to depend on one individual.</i> • <i>Updating SOPs that include mandatory site visits to vendors, checking ATM card stock opname at vendor locations, and controlling ATM card management and delivery.</i> • <i>Provisions need to be set regarding the internalization time limit for the new POJK.</i> • <i>A more in-depth analysis needs to be carried out on the potential liquidity risk that can arise if one of the large depositors withdraws their funds and impacts other depositors in the same group.</i> • <i>The completeness and readiness of the Foreign Exchange Bank Branch infrastructure has been ensured to be complete before being expanded to other branches.</i> • <i>For all business collaborations with Partners, to ensure that permits and approvals from the OJK/regulator have been obtained, including partner business permits, cooperation permits with partners, and related service products, including those related to the IT service providers involved.</i>
<p>Teknologi Informasi <i>Information Technology</i></p>	<ul style="list-style-type: none"> • Optimasi pengembangan sistem CRMA pada modul Audit BI perlu dilakukan agar dapat memantau temuan regulator dengan lebih efektif, sekaligus berfungsi sebagai sistem yang mengakomodasi seluruh regulasi dan menyampaikannya kepada Risk Taking Unit secara akurat dan tepat waktu. • Membuat memorandum sebagai solusi sementara guna mempercepat pembuatan SPO yang membutuhkan waktu lebih lama. • Kewajiban untuk melakukan audit TI oleh auditor independen dan menyampaikan laporannya kepada Bank dapat dijadikan sebagai salah satu persyaratan di awal saat penunjukan Penyedia Jasa TI khusus. • Field data dokumen yang sudah tersedia pada LOS dapat diintegrasikan dengan DMS, sehingga tidak perlu dilakukan input manual pada DMS. • <i>Optimization of CRMA system development in the BI Audit module needs to be done in order to monitor regulator findings more effectively, while also functioning as a system that accommodates all regulations and delivers them to the Risk Taking Unit accurately and on time.</i> • <i>Creating a memorandum as a temporary solution to accelerate the creation of SPOs that take longer.</i> • <i>The obligation to conduct IT audits by independent auditors and submit their reports to the Bank can be used as one of the initial requirements when appointing a special IT Service Provider.</i> • <i>Document data fields that are already available in the LOS can be integrated with the DMS, so that manual input is not necessary in the DMS.</i>

Lain Lain <i>Others</i>	<ul style="list-style-type: none"> • Dalam PKS dengan Mitra AB, perlu dicantumkan klausula yang mewajibkan mitra untuk segera melaporkan kepada BSS jika ditemukan indikasi fraud pada akun yang dibeli oleh BSS. • Setiap unit wajib memastikan bahwa PKS yang ada mencakup seluruh ketentuan dan regulasi yang berlaku, serta memastikan bahwa ketentuan tersebut terpenuhi dan diperbarui secara berkala. • Uji petik terhadap prosedur pengarsipan perlu dilakukan dengan mempertimbangkan tingkat kritikalitas dokumen, guna memastikan pengelolaan yang efektif, aman, dan sesuai dengan standar yang berlaku. • Terkait temuan-temuan yang dikategorikan pelanggaran berat, agar direkomendasikan penerapan sanksi kepada karyawan terkait sesuai ketentuan yang berlaku di Bank. • <i>In the PKS with AB Partners, a clause must be included that requires partners to immediately report to BSS if there is any indication of fraud in the account purchased by BSS.</i> • <i>Each unit must ensure that the existing PKS covers all applicable provisions and regulations, and ensure that these provisions are met and updated regularly.</i> • <i>Random testing of archiving procedures must be carried out by considering the level of criticality of the documents, in order to ensure effective, safe management, and in accordance with applicable standards.</i> • <i>Regarding findings that are categorized as serious violations, it is recommended that sanctions be applied to related employees in accordance with the provisions applicable at the Bank.</i>
Pelaporan <i>Reporting</i>	<ul style="list-style-type: none"> • Skenario pada engine/trigger MIS perlu dirancang sebagai bagian dari continuous auditing untuk memantau dan mengidentifikasi permasalahan pelaporan SLIK yang menjadi temuan regulator. • Diperlukan sistem atau tools yang dapat membantu mencegah kesalahan dalam pengambilan data, seperti dalam pemberian kode atau proses lainnya. • <i>Scenarios on the MIS engine/trigger need to be designed as part of continuous auditing to monitor and identify SLIK reporting issues that are found by regulators.</i> • <i>A system or tool is needed that can help prevent errors in data collection, such as in coding or other processes.</i>

Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi merupakan organ pendukung yang berperan dalam membantu Dewan Komisaris untuk menetapkan dan mengawasi terkait kebijakan remunerasi bagi organ Bank, serta memberikan usulan terkait pencalonan anggota Dewan Komisaris, anggota Direksi, dan termasuk pihak-pihak eksternal yang menjadi bagian dari komite Bank.

Piagam Komite

Piagam Komite Remunerasi dan Nominasi berfungsi sebagai pedoman kerja bagi Komite Remunerasi dan Nominasi yang telah diperbarui dan disahkan oleh Dewan Komisaris pada 1 April 2016. Isi dari piagam tersebut, terdiri dari:

1. Tujuan;
2. Referensi;
3. Fungsi dan Peranan secara Umum;
4. Tugas dan Tanggung Jawab;
5. Wewenang;
6. Struktur dan Keanggotaan;
7. Masa Tugas;
8. Waktu Kerja;
9. Mekanisme Kerja;
10. Mekanisme Pengambilan Keputusan Rapat;
11. Risalah Rapat;
12. Pelaporan; dan
13. Penutup.

Komposisi dan Profil Komite

Per 31 Desember 2024, Komite Remunerasi dan Nominasi Bank terdiri dari Komisaris Independen sebagai Ketua, 1 Komisaris, dan 1 Pejabat Eksekutif yang membidangi Direktorat Sumber Daya Manusia. Komite Remunerasi dan Nominasi merupakan organ pendukung di bawah Dewan Komisaris yang bertanggung jawab, berkoordinasi,

Remuneration and Nomination Committee

The Remuneration and Nomination Committee assists the Board of Commissioners in establishing and overseeing the remuneration policy for the Bank's organs. Furthermore, it provides proposals related to the nomination of members of the Board of Commissioners, members of the Board of Directors, and external parties who are part of the Bank's committees.

Charter of the Committee

The Remuneration and Nomination Committee Charter, which serves as a work guideline, was updated and ratified by the Board of Commissioners on 1 April 2016. The contents of the charter consist of:

1. Objectives;
2. Reference;
3. Functions and Roles in General;
4. Duties and Responsibilities;
5. Authority;
6. Structure and Composition;
7. Term of Office;
8. Business Hours;
9. Work Mechanism;
10. Decision-Making Mechanism in Meetings;
11. Minutes of Meeting;
12. Reporting; and
13. Closing.

Composition and Profile of the Committee

As of December 31, 2024, the Bank's Remuneration and Nomination Committee consists of an Independent Commissioner as Chairman, 1 Commissioner, and 1 Executive Officer in charge of the Human Resources Directorate. The Remuneration and Nomination Committee is a supporting organ under the Board of Commissioners that is responsible

serta menyampaikan Laporan Pelaksanaan Tugas secara langsung kepada Dewan Komisaris Bank. Adapun komposisi Komite Remunerasi dan Nominasi Bank selama tahun 2024 diungkapkan sebagai berikut:

for, coordinating, and submitting the Task Implementation Report directly to the Bank's Board of Commissioners. The composition of the Bank's Remuneration and Nomination Committee during 2024 is disclosed as follows:

Nama Name	Jabatan Position	Dasar Pengangkatan Basis of Appointment	Akhir Periode Jabatan End of Term of Office
Khoe Minhari Handikusuma	Ketua Chairperson	<ul style="list-style-type: none"> Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep 004/BSS/DIR/V/2023 tanggal 19 Mei 2023 Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-004/BSS/DIR/V/2020 tanggal 18 Mei 2020 Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep-004/BSS/DIR/V/2023 dated 19 May 2023; and Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep-004/BSS/DIR/V/2020 dated 18 May 2020. 	2023-2026
Budi Setiawan Halim	Anggota Member	<ul style="list-style-type: none"> Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-004/BSS/DIR/V/2023 tanggal 19 Mei 2023; Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-004/BSS/DIR/V/2020 tanggal 18 Mei 2020; dan Memorandum Penetapan Anggota Baru dan Penggantian Anggota Komite Pembantu Dewan Komisaris No. 018/IM/KOM/BSS/V/2017 tanggal 18 Mei 2017. 	2023-2026
Adriana Riani Novitasari	Anggota Member	<ul style="list-style-type: none"> Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep-004/BSS/DIR/V/2023 dated 19 May 2023; Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep-004/BSS/DIR/V/2020 dated 18 May 2020; and Memorandum of Determination of New Members and Replacement of Members of the Supporting Committees of the Board of Commissioners No. 018/IM/KOM/BSS/V/2017 dated 18 May 2017. 	

Khoe Minhari Handikusuma

Ketua Komite Remunerasi dan Nominasi Chairperson of Remuneration and Nomination Committee

Profil Khoe Minhari Handikusuma selaku Ketua Komite Remunerasi dan Nominasi dapat dilihat pada bagian Profil Dewan Komisaris dalam Bab Profil Perusahaan Laporan Tahunan ini.
The profile of Khoe Minhari Handikusuma as Chairman of the Remuneration and Nomination Committee can be seen in the Board of Commissioners Profile section in the Company Profile Chapter of this Annual Report.

Budi Setiawan Halim

Anggota Komite Remunerasi dan Nominasi Member of Remuneration and Nomination Committee

Profil Budi Setiawan Halim selaku Anggota Komite Remunerasi dan Nominasi dapat dilihat pada bagian Profil Dewan Komisaris dalam Bab Profil Perusahaan Laporan Tahunan ini.
The profile of Budi Setiawan Halim as a Member of the Remuneration and Nomination Committee can be seen in the Board of Commissioners Profile section in the Company Profile Chapter of this Annual Report.

Adriana Riani Novitasari

Anggota Komite Remunerasi dan Nominasi Member of Remuneration and Nomination Committee

Profil Adriana Riani Novitasari selaku Anggota Komite Remunerasi dan Nominasi dapat dilihat pada bagian Profil Pejabat Eksekutif dalam Bab Profil Perusahaan Laporan Tahunan ini.
The profile of Adriana Riani Novitasari as a Member of the Remuneration and Nomination Committee can be seen in the Executive Officer Profile section in the Company Profile Chapter of this Annual Report.

Tugas, Tanggung Jawab, dan Wewenang Komite

Komite Remunerasi dan Nominasi menjalankan tugas dan tanggung jawab sebagai berikut:

- Tugas terkait kebijakan remunerasi:
 - Melakukan pengawasan independen terhadap penerapan kebijakan remunerasi;
 - Memastikan bahwa kebijakan remunerasi telah sesuai dengan ketentuan yang berlaku;
 - Berkoordinasi dengan Satuan Kerja Manajemen Risiko dalam menetapkan kebijakan remunerasi yang bersifat variabel;

Duties, Responsibilities, and Authority of the Committee

The Remuneration and Nomination Committee carries out the following duties and responsibilities:

- Duties related to remuneration policy:
 - Conduct independent supervision of the implementation of the remuneration policy;
 - Ensure that the remuneration policy is in accordance with applicable provisions;
 - Coordinate with the Risk Management Work Unit in determining variable remuneration policies;

- d. Terkait remunerasi yang bersifat variabel, komite melakukan evaluasi secara berkala terhadap prinsip dan/atau kebijakan remunerasi dan nominasi, serta pelaksanaannya;
- e. Menyampaikan hasil evaluasi dan rekomendasi kepada Dewan Komisaris mengenai:
- Kebijakan remunerasi bagi Dewan Komisaris dan Direksi untuk disampaikan kepada RUPS; dan
 - Kebijakan remunerasi bagi Pejabat Eksekutif dan pegawai secara keseluruhan untuk disampaikan kepada Direksi;
- f. Dalam menjalankan tugas dan tanggung jawab terkait kebijakan remunerasi, sekurang-kurangnya anggota Komite Remunerasi dan Nominasi wajib memperhatikan:
- Kinerja keuangan dan pemenuhan cadangan sebagaimana diatur dalam peraturan perundangundangan yang berlaku;
 - Prestasi kerja individual;
 - Kewajaran dengan peer group; serta
 - Pertimbangan saran dan strategi jangka panjang Bank.
2. Tugas terkait kebijakan nominasi:
- a. Melakukan evaluasi terhadap prinsip dan/atau kebijakan promosi jabatan dan/atau nominasi serta pelaksanaannya, pada posisi strategis setingkat Direktur dan 1 level di bawah Direktur;
- b. Melakukan evaluasi berkala terhadap penerapan kebijakan promosi jabatan Bank, sebagaimana dimaksud pada poin a;
- c. Menyusun dan merekomendasikan sistem dan prosedur pemilihan dan/atau penggantian anggota Dewan Komisaris dan Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS;
- d. Memberikan rekomendasi mengenai calon anggota Dewan Komisaris dan/atau Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS; dan
- e. Memberikan rekomendasi mengenai pihak independen yang akan menjadi anggota Komite Audit maupun Komite Pemantau Risiko kepada Dewan Komisaris.
3. Tugas terkait tugas dan tanggung jawabnya:
- a. Menyusun pedoman dan tata tertib komite;
- b. Melaksanakan tugas lain yang diberikan Dewan Komisaris terkait remunerasi dan nominasi sesuai ketentuan yang berlaku; serta
- c. Melaporkan hasil pengkajian dan rekomendasi sehubungan tugas-tugas Komite Remunerasi dan Nominasi kepada Dewan Komisaris, apabila diperlukan.
- d. *Regarding variable remuneration, the committee conducts periodic evaluations of the principles and/or policies of remuneration and nomination, as well as their implementation;*
- e. *Submit evaluation results and recommendations to the Board of Commissioners regarding:*
- *Remuneration policy for the Board of Commissioners and Board of Directors to be submitted to the GMS; and*
 - *Remuneration policy for Executive Officers and employees as a whole to be submitted to the Board of Directors;*
- f. *In carrying out duties and responsibilities related to the remuneration policy, at least members of the Remuneration and Nomination Committee must pay attention to:*
- *Financial performance and fulfillment of reserves as stipulated in applicable laws and regulations;*
 - *Individual work performance;*
 - *Fairness with peer group; and*
 - *Consideration of the Bank's long-term suggestions and strategies.*
2. *Tasks related to nomination policies:*
- a. *Evaluating the principles and/or policies of job promotion and/or nomination and their implementation, in strategic positions at the Director level and 1 level below the Director;*
- b. *Conducting periodic evaluations of the implementation of the Bank's job promotion policy, as referred to in point a;*
- c. *Preparing and recommending the system and procedures for the selection and/or replacement of members of the Board of Commissioners and Board of Directors to the Board of Commissioners to be submitted to the GMS;*
- d. *Providing recommendations regarding candidates for members of the Board of Commissioners and/or Board of Directors to the Board of Commissioners to be submitted to the GMS; and*
- e. *Providing recommendations regarding independent parties who will become members of the Audit Committee or Risk Monitoring Committee to the Board of Commissioners.*
3. *Tasks related to their duties and responsibilities:*
- a. *Preparing guidelines and rules of procedure for the committee;*
- b. *Carrying out other tasks assigned by the Board of Commissioners related to remuneration and nomination in accordance with applicable provisions; and*
- c. *Reporting the results of the review and recommendations regarding the duties of the Remuneration and Nomination Committee to the Board of Commissioners, if necessary.*

Adapun wewenang yang dimiliki oleh Komite Remunerasi dan Nominasi Bank, yaitu:

1. Mengakses dokumen, data, dan informasi Bank Sahabat Sampoerna yang diperlukan;
2. Melakukan komunikasi secara langsung dengan karyawan, Direksi, dan pihak-pihak lain sesuai kebutuhan;
3. Melaksanakan kewenangan lain yang diberikan oleh Dewan Komisaris; dan
4. Melakukan kerja sama dengan Direktorat Sumber Daya Manusia.

Independensi

Anggota Komite Remunerasi dan Nominasi berkomitmen untuk mengutamakan sikap independensi, berlaku objektif, dan penuh kehati-hatian dalam pelaksanaan tugas dan tanggung jawabnya. Selain itu, komite ini senantiasa memastikan tidak memiliki benturan kepentingan dengan organ Bank lainnya dan tidak menerima intervensi dari para Pemegang Saham. Komitmen tersebut tercermin dalam pemenuhan aspek independensi sebagai berikut:

The authority held by the Bank's Remuneration and Nomination Committee is as follows:

1. *Accessing required Bank Sahabat Sampoerna documents, data, and information;*
2. *Communicating directly with employees, the Board of Directors, and other parties as needed;*
3. *Carrying out other authorities granted by the Board of Commissioners; and*
4. *Cooperating with the Human Resources Directorate.*

Independence

Members of the Remuneration and Nomination Committee are committed to prioritizing an independent attitude, acting objectively, and being careful in carrying out their duties and responsibilities. In addition, this committee always ensures that it does not have a conflict of interest with other Bank organs and does not accept intervention from Shareholders. This commitment is reflected in the fulfillment of the following independence aspects:

Aspek Independensi <i>Independence Aspect</i>	Khoe Minhari Handikusuma	Budi Setiawan Halim	Adriana Riani Novitasari
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. <i>Does not have financial relationships with the Board of Commissioners and the Board of Directors.</i>	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. <i>Does not have management relationships with Shareholders, Subsidiaries, and affiliated companies</i>	v	x Komisaris Utama adalah perwakilan dari Pemegang Saham <i>The President Commissioner is a representative of the Shareholders</i>	v
Tidak memiliki hubungan kepemilikan saham di Bank. <i>Does not have a share ownership relationship in the Bank.</i>	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Remunerasi dan Nominasi. <i>Does not have family relationships with the Board of Commissioners, the Board of Directors, and/or among members of the Remuneration and Nomination Committee.</i>	v	v	v

v : Terpenuhi / Fulfilled

x : Tidak terpenuhi / Unfulfilled

Sertifikasi Profesi Anggota Komite

Bank Sahabat Sampoerna berupaya untuk memastikan anggota Komite memiliki kualifikasi dan kompetensi yang memadai dalam melaksanakan fungsi dan tugasnya. Untuk itu, Bank mendorong dan memfasilitasi seluruh anggota Komite untuk mengikuti program sertifikasi sehingga dapat memastikan kapabilitas yang dimiliki tetap optimal sesuai dengan ketentuan yang berlaku. Adapun sertifikasi yang telah dimiliki oleh Komite Remunerasi dan Nominasi Bank hingga tahun 2024 disajikan sebagai berikut:

Professional Certification of Committee Members

Bank Sahabat Sampoerna strives to ensure that Committee members have adequate qualifications and competencies in carrying out their functions and duties. To that end, the Bank encourages and facilitates all Committee members to participate in certification programs so that they can ensure that their capabilities remain optimal in accordance with applicable provisions. The certifications that have been held by the Bank's Remuneration and Nomination Committee until 2024 are presented as follows:

No.	Sertifikasi <i>Certification</i>	Total (orang) <i>Total (Persons)</i>
1.	Sertifikasi Manajemen Risiko Jenjang 7 <i>Risk Management Certification Level 7</i>	1
2.	Sertifikasi Manajemen Risiko Jenjang 6 <i>Risk Management Certification Level 6</i>	2

Pelaksanaan Rapat Komite

Berdasarkan Piagam Komite, Komite Remunerasi dan Nominasi wajib melaksanakan rapat internal minimal 1 (satu) kali dalam 3 (tiga) bulan yang dipimpin oleh Ketua Komite. Sepanjang tahun 2024, Komite Remunerasi dan Nominasi telah melaksanakan rapat sebanyak 12 (dua belas) kali secara daring dan luring. Adapun frekuensi tingkat kehadiran dan agenda rapat Komite Remunerasi dan Nominasi yang dilakukan di tahun 2024 adalah sebagai berikut:

Nama Name	Jabatan Position	Total Rapat Total Meeting	Kehadiran Attendance	Persentase Percentage (%)
Khoe Minhari Handikusuma	Ketua Chairperson	2	2	100%
Budi Setiawan Halim	Anggota Member	2	2	100%
Adriana Riani Novitasari	Anggota Member	2	2	100%
Rata-Rata				100%

Implementation of Committee Meetings

Based on the Committee Charter, the Remuneration and Nomination Committee is required to hold an internal meeting at least 1 (one) time in 3 (three) months led by the Committee Chairperson. Throughout 2024, the Remuneration and Nomination Committee has held meetings as many as 12 (twelve) times online and offline. The frequency of attendance and agenda of the Remuneration and Nomination Committee meetings held in 2024 are as follows:

Tanggal Date	Agenda Agenda	Kehadiran Attendance		
		KMH	BSH	ARN
31 Mei 2024 May 31, 2024	<ol style="list-style-type: none"> Pembaruan struktur organisasi Cabang Paparan hasil pemenuhan Karyawan Paparan atas pelaksanaan kebijakan pengelolaan kinerja tim penjualan. Paparan atas pelaksanaan program sertifikasi untuk Bank Umum Paparan hasil penilaian kinerja Karyawan tahun 2023 <ol style="list-style-type: none"> Branch organizational structure update Employee fulfillment results presentation Exposure to the implementation of the sales team performance management policy. Exposure to the implementation of the certification program for Commercial Banks Exposure to the results of employee performance appraisal in 2023 	v	v	v
30 Desember 2024 December 30, 2024	<ol style="list-style-type: none"> Paparan atas perubahan organisasi SME & High End Business Paparan atas progres inisiatif program dari Human Capital tahun 2024 Paparan atas pelaksanaan program sertifikasi untuk Bank Umum <ol style="list-style-type: none"> Exposure to organizational changes in SME & High End Business Exposure on the progress of Human Capital program initiatives in 2024. Exposure on the implementation of certification program for Commercial Banks 	v	v	v

Keterangan / Description :
KMH: Khoe Minhari Handikusuma
BSH: Budi Setiawan Halim
ARN: Adriana Riani Novitasari

Pengembangan Kompetensi

Bank Sahabat Sampoerna senantiasa memfasilitasi Komite Remunerasi dan Nominasi untuk mengikuti kegiatan pengembangan kompetensi untuk memperluas pemahaman mengenai pelaksanaan tugas dan tanggung jawabnya. Sepanjang tahun 2024, Komite Remunerasi dan Nominasi telah mengikuti sejumlah kegiatan pengembangan kompetensi yang diungkapkan sebagai berikut:

Competency Development

Bank Sahabat Sampoerna always facilitates the Remuneration and Nomination Committee to participate in competency development activities to broaden their understanding of the implementation of their duties and responsibilities. Throughout 2024, the Remuneration and Nomination Committee has participated in a number of competency development activities as disclosed below:

Nama Name	Jabatan Position	Topik Pelatihan Training Topic	Penyelenggara Organizer	Tanggal Pelatihan Training Date
Khoe Minhari Handikusuma	Ketua Chairperson	Uji Sertifikasi Manajemen Risiko Jenjang 7 Risk Management Certification Test Level	Garda	6 Agustus 2024 August 6, 2024
Budi Setiawan Halim	Anggota Members	Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 6 Risk Management Certification Briefing & Test Level 6	Garda	21 Februari 2024 February 21, 2024

Nama Name	Jabatan Position	Topik Pelatihan Training Topic	Penyelenggara Organizer	Tanggal Pelatihan Training Date
Adriana Riani Novitasari	Anggota Members	<ul style="list-style-type: none"> Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 6 Learning from Milestones: Strategic Collaboration for Continuous Improvement Risk Management Certification Briefing & Test Level Learning from Milestones: Strategic Collaboration for Continuous Improvement 	Garda Bank Sahabat Sampoerna	14 Juni 2024 3 Oktober 2024 June 14, 2024 October 3, 2024

Mekanisme Pengangkatan dan Pemberhentian Ketua Komite Remunerasi dan Nominasi

Proses pengangkatan dan pemberhentian Ketua Komite Remunerasi dan Nominasi Bank mengacu pada Keputusan Dewan Komisaris. Pihak yang ditunjuk sebagai ketua komite ini merupakan Komisaris Independen yang telah memenuhi syarat dan kriteria yang berlaku. Adapun masa jabatan Ketua Remunerasi dan Nominasi ditetapkan selama 2 (dua) tahun atau lebih, akan tetapi tidak melebihi masa jabatan anggota Dewan Komisaris. Sementara itu, pengangkatan kembali ketua komite ini ditentukan berdasarkan hasil penilaian dari Dewan Komisaris.

Remunerasi

Anggota Komite Remunerasi dan Nominasi yang bukan bagian dari anggota Dewan Komisaris menerima remunerasi sesuai dengan kebijakan Bank dan disesuaikan dengan kondisi bisnis terkini.

Pelaksanaan Tugas Komite di Tahun 2024

Sepanjang tahun 2024, Komite Remunerasi dan Nominasi melaksanakan tugas dan tanggung jawabnya, antara lain:

Program Kerja Work Program	Pelaksanaan Implementation
Terkait Remunerasi Related to Remuneration	<ul style="list-style-type: none"> Penilaian kinerja tahun 2024 Penetapan remunerasi yang bersifat tetap dan variabel karyawan Performance appraisal in 2024 Determination of fixed and variable employee remuneration
Terkait Nominasi Related to Nominations	Paparan atas perubahan organisasi SME & High End Business Exposure to SME & High End Business organizational changes

Rekomendasi

Berdasarkan pelaksanaan tugas sepanjang tahun 2024, Komite Remunerasi dan Nominasi telah menyampaikan sejumlah rekomendasi, antara lain:

- Dalam rangka pengembangan karier karyawan, agar dilakukan penilaian kinerja seluruh organisasi Bank secara obyektif dan adil, meliputi seluruh karyawan sesuai dengan prinsip meritokras.
- Optimalisasi fungsi pengembangan kompetensi yang berkelanjutan sehingga dapat memberikan kontribusi yang lebih maksimal bagi Bank. Hal tersebut dilakukan melalui proses monitoring terhadap efektivitas training, khususnya pada Fungsi Sales dan Kredit.

Mechanism for Appointment and Dismissal of the Chairman of the Remuneration and Nomination Committee

The process of appointment and dismissal of the Chairman of the Bank's Remuneration and Nomination Committee refers to the Decision of the Board of Commissioners. The party appointed as the chairman of this committee is an Independent Commissioner who has met the applicable requirements and criteria. The term of office of the Chairman of Remuneration and Nomination is set for 2 years or more, but does not exceed the term of office of the members of the Board of Commissioners. Meanwhile, the reappointment of the chairman of this committee is determined based on the results of the assessment by the Board of Commissioners.

Remuneration

Members of the Remuneration and Nomination Committee who are not part of the Board of Commissioners receive remuneration in accordance with the Bank's policy and adjusted to current business conditions.

Implementation of Committee Duties in 2024

Throughout 2024, the Remuneration and Nomination Committee carries out its duties and responsibilities, including:

Recommendations

Based on the implementation of tasks throughout 2024, the Remuneration and Nomination Committee has submitted a number of recommendations, including:

- In order to develop employee careers, an objective and fair performance assessment of the entire Bank organization should be carried out, covering all employees in accordance with the principle of meritocracy.
- Optimizing the function of sustainable competency development so that it can provide maximum contribution to the Bank. This is done through a monitoring process of training effectiveness, especially in the Sales and Credit Functions.

3. Melakukan evaluasi terhadap kebutuhan Bank dan diseleraskan dengan program pengembangan kompetensi secara berkelanjutan dalam rangka menghadirkan kinerja terbaik bagi Bank.

Komite Pemantau Risiko

Komite Pemantau Risiko merupakan organ pendukung berfungsi untuk membantu Dewan Komisaris melaksanakan tanggung jawab pengawasan risiko yang mungkin timbul dari kegiatan operasional Bank. Komite Pemantau Risiko juga bertugas untuk mengevaluasi kesesuaian antara kebijakan manajemen risiko dengan penerapannya di lingkungan Bank.

Piagam Komite

Komite Pemantau Risiko melaksanakan tugas dan tanggung jawabnya dengan berpedoman pada Piagam Komite Pemantau Risiko yang telah diperbarui dan disahkan oleh Dewan Komisaris pada Februari 2024. Isi dari piagam tersebut, terdiri dari:

1. Tujuan;
2. Referensi;
3. Fungsi dan Peranan Secara Umum;
4. Tugas dan Tanggung Jawab;
5. Wewenang;
6. Struktur dan Keanggotaan;
7. Persyaratan Keanggotaan;
8. Masa Tugas;
9. Mekanisme Kerja;
10. Waktu Kerja;
11. Rapat Komite;
12. Mekanisme Pengambilan Keputusan Rapat;
13. Risalah Rapat;
14. Pelaporan; dan
15. Penutup.

Komposisi dan Profil Komite

Di tahun 2024, komposisi Komite Pemantau Risiko berjumlah 4 (empat) orang yang terdiri dari 1 (satu) orang Ketua yang merupakan Komisaris Independen, 1 (satu) orang Komisaris, dan 2 (dua) orang pihak independen yang masing-masing ahli di bidang keuangan dan manajemen risiko. Komite Pemantau Risiko merupakan organ pendukung di bawah Dewan Komisaris yang bertanggung jawab, berkoordinasi, serta menyampaikan Laporan Pelaksanaan Tugas secara langsung kepada Dewan Komisaris Bank. Adapun komposisi Komite Audit di tahun 2024 adalah sebagai berikut:

3. *Evaluating the Bank's needs and aligning them with the sustainable competency development program in order to present the best performance for the Bank.*

Risk Oversight Committee

The Risk Oversight Committee is established to assist the Board of Commissioners in carrying out the responsibility of overseeing risks that may arise from the Bank's operational activities. This committee also has the duty to evaluate the alignment between the Bank's risk management policy and its implementation.

Charter of the Committee

The Risk Oversight Charter, as a work guideline, was updated and ratified by the Board of Commissioners in May 2023. The contents of the charter consist of:

1. Objectives;
2. Reference;
3. Functions and Roles in General;
4. Duties and Responsibilities;
5. Authority;
6. Structure and Composition;
7. Membership Requirements;
8. Term of Office;
9. Work Mechanism;
10. Business Hours;
11. Committee Meetings;
12. Decision-Making Mechanism in Meetings;
13. Minutes of Meeting;
14. Reporting; and
15. Closing.

Committee Composition and Profile

In 2024, the composition of the Risk Monitoring Committee will consist of 4 (four) people consisting of 1 (one) Chairperson who is an Independent Commissioner, 1 (one) Commissioner, and 2 (two) independent parties who are each experts in the fields of finance and risk management. The Risk Monitoring Committee is a supporting organ under the Board of Commissioners which is responsible for, coordinating, and submitting the Task Implementation Report directly to the Bank's Board of Commissioners. The composition of the Audit Committee in 2024 is as follows:

Nama <i>Name</i>	Jabatan <i>Position</i>	Dasar Pengangkatan <i>Basis of Appointment</i>	Akhir Periode Jabatan <i>End of Term of Office</i>
Khoe Minhari Handikusuma	Ketua <i>Chairperson</i>	<ul style="list-style-type: none"> Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 tanggal 19 Mei 2023 Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-005/BSS/DIR/V/2020 tanggal 18 Mei 2020 Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep.004/BSS/DIR/ VIII/2017 tanggal 18 Agustus 2017 <i>Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep-002/BSS/ DIR/V/2023 dated 19 May 2023;</i> <i>Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep-005/BSS/ DIR/V/2020 dated 18 May 2020; and</i> <i>Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep.004/BSS/DIR/VIII/2017 dated 18 August 2017.</i> 	2023-2026
Harry Mulyadi Santoso	Anggota <i>Member</i>	<ul style="list-style-type: none"> Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 tanggal 19 Mei 2023 Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-005/BSS/DIR/V/2020 tanggal 18 Mei 2020 Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-001.a/BSS/DIR/II/2019 tanggal 15 Februari 2019 <i>Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep-002/BSS/ DIR/V/2023 dated 19 May 2023;</i> <i>Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep-005/BSS/ DIR/V/2020 dated 18 May 2020; and</i> <i>Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep-001.a/BSS/DIR/II/2019 dated 15 February 2019.</i> 	2023-2026
Juwono Akuan Rokanta	Anggota <i>Member</i>	<ul style="list-style-type: none"> Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 tanggal 19 Mei 2023 Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-005/BSS/DIR/V/2020 tanggal 18 Mei 2020 Memorandum Penetapan Anggota Baru dan Penggantian Anggota Komite Pembantu Dewan Komisaris No. 018/IM/KOM/BSS/V/2017 tanggal 18 Mei 2017 <i>Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep-002/BSS/ DIR/V/2023 dated 19 May 2023;</i> <i>Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep-005/BSS/ DIR/V/2020 dated 18 May 2020; and</i> <i>Memorandum of Determination of New Members and Replacement of Members of the Supporting Committee of the Board of Commissioners No. 018/IM/KOM/BSS/V/2017 dated 18 May 2017.</i> 	2023-2026
Ikun M. Soedrajat	Anggota <i>Member</i>	Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 tanggal 19 Mei 2023. <i>Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 dated 19 May 2023.</i>	2023-2026

Khoe Minhari Handikusuma

Ketua Komite Pemantau Risiko *Chairperson of Risk Oversight Committee*

Profil Khoe Minhari Handikusuma selaku Ketua Komite Pemantau Risiko dapat dilihat pada bagian Profil Dewan Komisaris dalam Bab Profil Perusahaan Laporan Tahunan ini.

The profile of Khoe Minhari Handikusuma as Chairman of the Risk Monitoring Committee can be seen in the Board of Commissioners Profile section in the Company Profile Chapter of this Annual Report.

Harry Mulyadi Santoso

Anggota Komite Pemantau Risiko *Member of Risk Oversight Committee*

Profil Harry Mulyadi Santoso selaku Anggota Komite Pemantau Risiko dapat dilihat pada bagian Profil Dewan Komisaris dalam Bab Profil Perusahaan Laporan Tahunan ini.

The profile of Harry Mulyadi Santoso as a Member of the Risk Monitoring Committee can be seen in the Board of Commissioners Profile section in the Company Profile Chapter of this Annual Report.

Juwono Akuan Rokanta

Anggota Komite Pemantau Risiko *Member of Risk Oversight Committee*

Profil Juwono Akuan Rokanta selaku Anggota Komite Pemantau Risiko dapat dilihat pada bagian Komposisi dan Profil Komite Audit dalam Bab Tata Kelola Perusahaan Laporan Tahunan ini.

The profile of Juwono Akuan Rokanta as a Member of the Risk Monitoring Committee can be seen in the Composition and Profile of the Audit Committee section in the Corporate Governance Chapter of this Annual Report.



Ikun M. Soedrajat

Anggota Komite Pemantau Risiko
Member of the Risk Oversight Committee

Kewarganegaraan | Nationality
Indonesia | Indonesian

Usia | Age
62 Tahun | years old

Domisili | Domicile
Jakarta, Indonesia
Jakarta, Indonesia

Dasar Hukum Pengangkatan <i>Legal Basis of Appointment</i>	2023-2026: Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 tanggal 19 Mei 2023 2023-2026: Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 dated May 19, 2023
Riwayat Pendidikan <i>Education</i>	<ul style="list-style-type: none"> Master of Management, Universitas Gajah Mada, Yogyakarta (2023) Electricity Power Engineering, Institut Teknologi Bandung, Bandung (1987)
Keahlian <i>Expertise</i>	Manajemen dan Perbankan <i>Management and Banking</i>
Sertifikasi Profesi <i>Professional Certification</i>	Sertifikasi Manajemen Risiko Jenjang 7 <i>Level 7 Risk Management Certification</i>
Riwayat Pekerjaan <i>Work Experience</i>	<ul style="list-style-type: none"> Anggota Komite Audit dan Komite Pemantau Risiko PT Commerce Finance Komisaris Utama PT Samulos Harmoni Energi Perkasa Direktur Keuangan di PT Dewata Freight International Tbk Member of the Audit Committee and Risk Monitoring Committee of PT Commerce Finance President Commissioner of PT Samulos Harmoni Energi Perkasa Finance Director at PT Dewata Freight International Tbk
Rangkap Jabatan <i>Concurrent Position</i>	Tidak memiliki rangkap jabatan di perusahaan lain di luar Grup Sampoerna Strategic. <i>Does not hold concurrent positions in other companies outside the Sampoerna Strategic Group.</i>
Hubungan Afiliasi <i>Affiliation Relationship</i>	Tidak memiliki hubungan keuangan, kepengurusan, dan kekeluargaan dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali. <i>Does not have financial, management, and family relationships with members of the Board of Commissioners, members of the Board of Directors, and Majority and Controlling Shareholders.</i>
Kepemilikan Saham <i>Share Ownership</i>	Tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic. <i>Does not own shares, either in Bank Sahabat Sampoerna or other companies affiliated with the Sampoerna Strategic Group.</i>

Tugas, Tanggung Jawab, dan Wewenang Komite

Bank telah menetapkan tugas dan tanggung jawab Komite Pemantau Risiko sebagai berikut.

- Memberikan pendapat profesional yang independen kepada Dewan Komisaris atas laporan atau hal-hal yang disampaikan Direksi, serta mengidentifikasi hal yang memerlukan perhatian Dewan Komisaris sehubungan dengan manajemen risiko Bank Sahabat Sampoerna.
- Mengevaluasi isi kebijakan manajemen risiko Bank Sahabat Sampoerna dan mengevaluasi kesesuaian kebijakan tersebut dengan pelaksanaannya dalam rangka memberikan rekomendasi kepada Dewan Komisaris, setidaknya sekali setahun.
- Memantau dan mengevaluasi Satuan Kerja Manajemen Risiko dan pelaksanaan tugas-tugas komitennya dalam rangka memberikan rekomendasi tertulis kepada Dewan Komisaris.

Duties, Responsibilities, and Authority of the Committee

The Bank has established the duties and responsibilities of the Risk Oversight Committee as follows.

- Providing independent professional opinion to the Board of Commissioners on reports or matters submitted by the Board of Directors, and identifying matters that require the attention of the Board of Commissioners in relation to Bank Sahabat Sampoerna's risk management.
- Evaluating the contents of Bank Sahabat Sampoerna's risk management policy and the conformity of the policy with its implementation in order to provide recommendations to the Board of Commissioners at least once a year.
- Monitoring and evaluating the Risk Management Division and the implementation of its committee tasks in order to provide written recommendations to the Board of Commissioners.

4. Melaporkan berbagai risiko yang dihadapi oleh Bank Sahabat Sampoerna kepada Dewan Komisaris dan penerapan manajemen risiko oleh Direksi.
5. Mengevaluasi pertanggungjawaban Direksi atas pelaksanaan kebijakan manajemen risiko setidaknya sekali dalam 3 bulan.
6. Mengatur atau memberikan wewenang pelaksanaan penyelidikan dalam ruang lingkupnya.
7. Memiliki kewajiban mematuhi Kode Etik Bank Sahabat Sampoerna.
8. Melakukan tindakan secara independen dalam pelaksanaan tugas dan tanggung jawab.
9. Menjaga kerahasiaan dokumen, data, dan informasi Bank Sahabat Sampoerna.
10. Menyusun, mengkaji, dan memperbarui Piagam Komite Pemantau Risiko secara berkala.
11. Wajib meningkatkan kompetensi melalui pendidikan dan pelatihan secara terus-menerus.

Sementara, wewenang yang dimiliki oleh Komite Pemantau Risiko Bank, yaitu:

1. Mengakses dokumen, data, dan informasi Bank Sahabat Sampoerna yang diperlukan;
2. Melakukan komunikasi secara langsung dengan karyawan, Direksi, dan pihak-pihak lainnya;
3. Melibatkan pihak berwenang yang merupakan pihak independen untuk membantu pelaksanaan tugasnya, jika diperlukan;
4. Melakukan kewenangan lain yang diberikan oleh Dewan Komisaris; dan
5. Bekerja sama dengan Satuan Kerja Manajemen Risiko.

Independensi Komite

Anggota Komite Pemantau Risiko berkomitmen untuk mengutamakan sikap independensi, berlaku objektif, dan penuh kehati-hatian dalam pelaksanaan tugas dan tanggung jawabnya. Selain itu, komite ini senantiasa memastikan tidak memiliki benturan kepentingan dengan organ Bank lainnya dan tidak menerima intervensi dari para Pemegang Saham. Komitmen tersebut tercermin dalam pemenuhan aspek independensi sebagai berikut.

4. Reporting various risks faced by Bank Sahabat Sampoerna to the Board of Commissioners and the risk management implementation by the Board of Directors.
5. Evaluating the accountability of the Board of Directors for the implementation of risk management policies at least once every 3 months.
6. Regulating or authorizing an audit within its scope.
7. Having an obligation to comply with the Code of Conduct of Bank Sahabat Sampoerna.
8. Performing actions independently in implementing the duties and responsibilities.
9. Maintaining the confidentiality of documents, data, and information of Bank Sahabat Sampoerna.
10. Preparing, reviewing, and updating the Risk Oversight Committee Charter periodically.
11. Having the obligation to increase competence through continuous education and training.

Furthermore, the authority possessed by the Bank's Risk Oversight Committee includes:

1. Access the required Bank Sahabat Sampoerna documents, data, and information;
2. Communicate directly with employees, the Board of Directors, and other parties;
3. Involve the authorities who are independent parties to assist in the implementation of the duties, if needed;
4. Perform other authority granted by the Board of Commissioners; and
5. Cooperate with the Risk Management Division.

Independency of the Committee

Members of the Risk Oversight Committee are committed to prioritizing independence and acting objectively and prudentially in executing their duties and responsibilities. In addition, this committee consistently ensures that it does not have a conflict of interest with other Bank organs and does not receive intervention from Shareholders. This commitment is reflected in the fulfillment of the following aspects of independence.

Aspek Independensi <i>Independence Aspect</i>	Khoe Minhari Handikusuma	Harry Mulyadi Santoso	Juwono Akuan Rokanta	Ikun M. Soedrajat
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. <i>Does not have financial relationships with the Board of Commissioners and Board of Directors.</i>	v	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. <i>Does not have management relationships with Shareholders, Subsidiaries, and affiliated companies</i>	v	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. <i>Does not have a share ownership relationship in the Bank.</i>	v	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Pemantau Risiko.	v	v	v	v

v : Terpenuhi | Fulfilled

x : Tidak terpenuhi | Unfulfilled

Bank Sahabat Sampoerna berupaya untuk memastikan anggota Komite memiliki kualifikasi dan kompetensi yang memadai dalam melaksanakan fungsi dan tugasnya. Untuk itu, Bank mendorong dan memfasilitasi seluruh anggota Komite untuk mengikuti program sertifikasi sehingga dapat memastikan kapabilitas yang dimiliki tetap optimal sesuai dengan ketentuan yang berlaku. Adapun sertifikasi yang telah dimiliki oleh Komite Pemantau Risiko Bank hingga tahun 2024 disajikan sebagai berikut:

Bank Sahabat Sampoerna strives to ensure that Committee members have adequate qualifications and competencies in carrying out their functions and duties. To that end, the Bank encourages and facilitates all Committee members to participate in certification programs so that they can ensure that their capabilities remain optimal in accordance with applicable regulations. The certifications that have been held by the Bank's Risk Monitoring Committee until 2024 are presented as follows:

No.	Sertifikasi Certification	Total (orang) Total (Persons)
1.	Sertifikasi Manajemen Risiko Jenjang 7 Risk Management Certification Level 7	3
2.	Sertifikasi Manajemen Risiko Jenjang 6 Risk Management Certification Level 6	1

Pelaksanaan Rapat Komite

Berdasarkan Piagam Komite, Komite Pemantau Risiko wajib melaksanakan rapat internal minimal 1 (satu) kali dalam 1 (satu) bulan. Sepanjang tahun 2024, Komite Pemantau Risiko telah melaksanakan rapat sebanyak 12 (dua belas) kali, secara daring dan luring. Adapun frekuensi tingkat kehadiran dan agenda rapat Komite Pemantau Risiko yang dilakukan di tahun 2024 adalah sebagai berikut:

Committee Meeting Implementation

Based on the Committee Charter, the Risk Monitoring Committee is required to hold an internal meeting at least 1 (one) time in 1 (one) month. Throughout 2024, the Risk Monitoring Committee has held meetings as many as 12 (twelve) times, online and offline. The frequency of attendance and agenda of the Risk Monitoring Committee meetings held in 2024 are as follows:

Nama Name	Jabatan Position	Total Rapat Total Meeting	Kehadiran Attendance	Persentase Percentage (%)
Khoe Minhari Handikusuma	Ketua Chairman	12	12	100%
Harry Mulyadi Santoso	Anggota Member	12	10	83%
Juwono Akuan Rokanta	Anggota Member	12	12	100%
Ikun M. Soedrajat	Anggota Member	12	11	92%
Rata-Rata Average				94%

No	Tanggal Date	Agenda Agenda	Kehadiran Attendance			
			KMH	HMS	JAR	IMS
1	23 Januari 23 January	<ul style="list-style-type: none"> Update ketentuan EWS FI Update kinerja BSS per Desember 2023 Strategy and activity risk terhadap RBB 2024 Update on EWS FI provisions Update on BSS performance as of December 2023 Strategy and activity risk towards RBB 2024 	v	v	v	v
2	20 Februari 20 February	<ul style="list-style-type: none"> Update regulasi Update portfolio Update action plan perbaikan kualitas kredit Update on regulations Update on portfolio Update on action plan for credit quality improvement 	v	v	v	v
3	19 Maret 19 March	<ul style="list-style-type: none"> Update terkait penjelasan permasalahan hukum dan posisi Bank atas gugatan hukum Update booking quality 3 tahun dan portfolio kredit Update hasil review RAS dan limit kredit Update on explanation of legal issues and the Bank's position on lawsuits Update on 3-year booking quality and credit portfolio Update on RAS review results and credit limits 	v	x	v	v

No	Tanggal Date	Agenda Agenda	Kehadiran Attendance			
			KMH	HMS	JAR	IMS
4	26 April 26 April	<ul style="list-style-type: none"> Update APU PPT Update portfolio Update ProBiz AML-CTF Update Portfolio Update ProBiz Update 	v	v	v	v
5	27 Mei 27 May	<ul style="list-style-type: none"> Update APU PPT Anti fraud update Portfolio FI & EWS Update portfolio AML-CTF Update Anti fraud update FI & EWS Portfolio Portfolio Update 	v	v	v	x
6	21 Juni 21 June	<ul style="list-style-type: none"> Update resolution plan dan recovery Update kebijakan pengamanan informasi Update portfolio beserta strategi dan action plan Resolution plan and recovery update Information security policy update Portfolio update along with strategy and action plan 	v	v	v	v
7	23 Juli 23 July	<ul style="list-style-type: none"> Update regulasi dan kepatuhan semester 1 Update risiko likuiditas Update portfolio kredit-action plan & progress monitoring Regulation and compliance update semester 1 Liquidity risk update Credit portfolio update-action plan & progress monitoring 	v	v	v	v
8	13 Agustus 13 August	<ul style="list-style-type: none"> Update ESME Business update-profitabilitas & strategi portfolio ESME Business update-profitability & portfolio strategy 	v	v	v	v
9	17 September 17 September	<ul style="list-style-type: none"> Early warning system FI Update lanjutan profitability life time ESME Yield analisis dari aset produktif beserta interest bearing liabilities cost BSS Update portfolio FI early warning system ESME profitability life time update Yield analysis of productive assets along with interest bearing liabilities cost BSS Portfolio update 	v	v	v	v
10	22 Oktober 22 October	<ul style="list-style-type: none"> Kewenangan Khusus Update CKPN Overview Update portofolio per September 2024 Kasus fraud per September 2024 Special Authority CKPN Overview Update Portfolio update as of September 2024 Fraud cases as of September 2024 	v	v	v	v
11	19 November 19 November	<ul style="list-style-type: none"> Update kepatuhan per semester III 2024 Update APU PPT per semester III 2024 Update hasil resolution dan recovery plan BSS Update fraud trend 2024 beserta pelaksanaan strategi anti fraud Update portofolio per Oktober 2024 Compliance update as of semester III 2024 APU PPT update as of semester III 2024 BSS resolution and recovery plan results update Fraud trend update 2024 along with implementation of anti-fraud strategy Portfolio update as of October 2024 	v	v	v	v

No	Tanggal Date	Agenda Agenda	Kehadiran Attendance			
			KMH	HMS	JAR	IMS
13	20 Desember 20 December	<ul style="list-style-type: none"> Lending Center Update Credit Policy Update Strategi dan Penguatan Manajemen Risiko – 2025 Portofolio Update as of November 2024 Lending Center Update Credit Policy Update Risk Management Strategy and Strengthening - 2025 Portofolio Update as of November 2024 	v	x	v	v
Jumlah Kehadiran Total Attendance			12	10	12	11

Keterangan | Description:
 KMH : Khoe Minhari Handikusuma
 IMS : Ikun M Soedrajat
 JAR : Juwono Akuan Rokanta
 HMS : Harry Mulyadi Santoso

Pengembangan Kompetensi

Bank Sahabat Sampoerna senantiasa memfasilitasi Komite Pemantau Risiko untuk mengikuti kegiatan pengembangan kompetensi untuk memperluas pemahaman mengenai pelaksanaan tugas dan tanggung jawabnya. Sepanjang tahun 2024, Komite Pemantau Risiko telah mengikuti sejumlah kegiatan pengembangan kompetensi yang diungkapkan sebagai berikut:

Competence Development

Bank Sahabat Sampoerna always facilitates the Risk Monitoring Committee to participate in competency development activities to broaden understanding regarding the implementation of its duties and responsibilities. Throughout 2024, the Risk Monitoring Committee has participated in a number of competency development activities as disclosed as follows:

Nama Name	Jabatan Position	Topik Pelatihan Topic of Training	Penyelenggara Organizer	Tanggal Pelatihan Training Date
Khoe Minhari Handikusuma	Ketua Chairperson	Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 Risk Management Certification Provision & Exam Level 7	Garda	6 Agustus August 6
Harry Mulyadi Santoso	Anggota Members	Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 6 Risk Management Certification Provision & Exam Level 6	Garda	21 Februari February 21
Juwono Akuan Rokanta	Anggota Member	<ul style="list-style-type: none"> Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 APU PPT & PPPSPM Risk Management Certification Provision & Test Level 7 APU PPT & PPPSPM 	<ul style="list-style-type: none"> Garda Bank Sahabat Sampoerna 	7 Oktober October 7
Ikun M. Soedrajat	Anggota Member	Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 Risk Management Certification Provision & Exam Level 7	Garda	7 Oktober October 7

Mekanisme Pengangkatan dan Pemberhentian Ketua Komite Pemantau Risiko

Proses pengangkatan dan pemberhentian Ketua Pemantau Risiko Bank mengacu pada Surat Keputusan Direksi Bank tentang Penetapan Anggota Komite Pemantau Risiko, serta berpedoman pada Memorandum Internal dari Dewan Komisaris mengenai Penetapan Anggota Baru dan Penggantian Anggota Komite Pembantu Dewan Komisaris.

Mechanism for Appointment and Dismissal of the Chairman of the Risk Monitoring Committee

The process of appointment and dismissal of the Chairman of the Bank's Risk Monitoring Committee refers to the Decree of the Bank's Board of Directors concerning the Determination of Members of the Risk Monitoring Committee, and is guided by the Internal Memorandum of the Board of Commissioners concerning the Determination of New Members and Replacement of Members of the Assistant Committee of the Board of Commissioners.

Pihak yang ditunjuk sebagai ketua komite ini merupakan Komisaris Independen yang telah memenuhi syarat dan kriteria yang berlaku. Adapun masa jabatan Ketua Pemantau Risiko ditetapkan selama 2 tahun atau lebih, akan tetapi tidak melebihi masa jabatan anggota Dewan Komisaris. Sementara, pengangkatan kembali Ketua Pemantau Risiko ditentukan berdasarkan hasil penilaian dari Dewan Komisaris.

Remunerasi

Anggota Komite Pemantau Risiko yang bukan bagian dari anggota Dewan Komisaris menerima remunerasi sesuai dengan kebijakan Bank dan disesuaikan dengan kondisi bisnis terkini.

Pelaksanaan Tugas Komite di Tahun 2024

Sepanjang tahun 2024, Komite Pemantau Risiko melaksanakan tugas dan tanggung jawabnya, antara lain:

The party appointed as the chairman of this committee is an Independent Commissioner who has met the applicable requirements and criteria. The term of office of the Chairman of the Risk Monitoring Committee is set for 2 years or more, but does not exceed the term of office of members of the Board of Commissioners. Meanwhile, the reappointment of the Chairman of the Risk Monitoring Committee is determined based on the results of the assessment by the Board of Commissioners.

Remuneration

Members of the Risk Monitoring Committee who are not part of the Board of Commissioners receive remuneration in accordance with Bank policy and adjusted to current business conditions.

Implementation of Duties of the Committee in 2024

Throughout 2024, the Risk Monitoring Committee carries out its duties and responsibilities, including:

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
<p>Memantau dan mengevaluasi tugas Satuan Kerja Manajemen Risiko <i>Monitor and evaluate the work of the Risk Management Unit</i></p>	<ul style="list-style-type: none"> • Memantau pelaksanaan penerapan manajemen risiko Bank berdasarkan penilaian tingkat risiko Bank secara keseluruhan • Mendiskusikan pelaksanaan monitoring atas risk appetite statement Bank dan limit parameter kredit Bank • Mendiskusikan hasil monitoring atas <i>report early warning system</i> pada debitur segmen bisnis <i>Financial Institution (FI)</i> • <i>Monitored the implementation of the Bank's risk management based on an assessment of the Bank's overall risk level</i> • <i>Discussed the implementation of monitoring on the Bank's risk appetite statement and the Bank's credit parameter limits</i> • <i>Discussed the monitoring results of the early warning system report on Financial Institution (FI) business segment debtors</i>
<p>Mengevaluasi kebijakan manajemen risiko Bank dan kesesuaian kebijakan manajemen risiko dengan pelaksanaannya <i>Evaluate the Bank's risk management policy and the suitability of the risk management policy with its implementation</i></p>	<ul style="list-style-type: none"> • Mendiskusikan dan mengevaluasi penerapan kebijakan perkreditan Bank sesuai dengan pelaksanaannya • <i>Discuss and evaluate the application of the Bank's credit policy in accordance with its implementation</i>
<p>Melaporkan kepada Dewan Komisaris berbagai risiko yang dihadapi oleh Bank dan penerapan manajemen risiko oleh Direksi <i>Report to the Board of Commissioners the various risks faced by the Bank and the implementation of risk management by the Board of Directors.</i></p>	<ul style="list-style-type: none"> • Mendiskusikan mengenai kondisi performance portfolio perkreditan Bank sesuai dengan segmen bisnis Bank • Mendiskusikan mengenai penilaian tingkat risiko Bank secara keseluruhan berdasarkan penilaian 8 jenis risiko • <i>Discussed the performance condition of the Bank's loan portfolio in accordance with the Bank's business segments</i> • <i>Discussed the assessment of the Bank's overall risk level based on the assessment of 8 types of risk</i>

Rekomendasi

Berdasarkan pelaksanaan tugas sepanjang tahun 2024, Komite Pemantau Risiko telah menyampaikan sejumlah rekomendasi sesuai dengan fungsinya. Rekomendasi tersebut tak lepas dari wewenang komite dalam hal mengakses dokumen, data, dan informasi Bank Sahabat Sampoerna yang diperlukan, melibatkan pihak berwenang yang merupakan pihak independen untuk membantu pelaksanaan tugasnya (jika diperlukan), serta bekerja sama dengan Satuan Kerja Manajemen Risiko.

Recommendations

Based on the implementation of tasks throughout 2024, the Risk Monitoring Committee has submitted a number of recommendations in accordance with its functions. These recommendations are inseparable from the committee's authority in terms of accessing the necessary documents, data, and information of Bank Sahabat Sampoerna, involving authorized parties who are independent parties to assist in the implementation of its duties (if necessary), and collaborating with the Risk Management Work Unit.

Organ Pendukung Direksi

Board of Directors Supporting Organs

Dalam membantu memaksimalkan pelaksanaan tugas dan tanggung jawab pengelolaan Bank, Direksi dapat membentuk organ pendukung sesuai dengan ketentuan perundang-undangan. Direksi telah membentuk sejumlah organ pendukung, antara lain Manajemen Risiko, Komite Kebijakan Perkreditan, *Assets Liability Committee* (ALCO), Komite Pengarah Teknologi Informasi, Komite Manajemen Risiko Operasional, Komite Produk, dan Komite Kredit. Informasi terkait masing-masing organ pendukung Direksi diuraikan sebagai berikut:

Komite Manajemen Risiko

Komite Manajemen Risiko merupakan organ pendukung Direksi yang berperan untuk menjaga Bank dari kerugian yang mungkin disebabkan oleh aktivitas operasional, serta bertanggung jawab menjaga besaran risiko yang dihadapi Bank, agar sesuai dengan *risk appetite* yang ditetapkan oleh manajemen Bank.

Piagam Komite

Dalam menjalankan tugas dan tanggung jawabnya, Komite Manajemen Risiko berpedoman pada Kebijakan Umum Manajemen Risiko dan Memo Internal perihal Penyempurnaan Susunan Komite Manajemen Risiko Bank Sahabat Sampoerna.

Tugas, Tanggung Jawab, dan Wewenang Komite

Tugas dan tanggung jawab Komite Manajemen Risiko, yaitu memberikan rekomendasi kepada Direktur Utama mengenai hal-hal berikut:

1. Penyusunan kebijakan manajemen risiko serta perubahannya, termasuk strategi manajemen risiko, tingkat risiko yang diambil dan toleransi risiko, kerangka manajemen risiko, serta rencana kontingensi untuk mengantisipasi terjadinya kondisi tidak normal.
2. Penyempurnaan proses manajemen risiko secara berkala maupun bersifat insidental sebagai akibat dari suatu perubahan kondisi eksternal dan internal Bank yang memengaruhi kecukupan modal, profil risiko Bank, dan tidak efektifnya penerapan manajemen risiko berdasarkan hasil evaluasi.
3. Penetapan kebijakan dan/atau keputusan bisnis yang menyimpang dari prosedur normal, seperti pelampauan ekspansi usaha yang signifikan dibandingkan dengan Rencana Bisnis Bank yang telah ditetapkan sebelumnya atau pengambilan posisi/eksposur risiko yang melampaui limit yang telah ditetapkan.

In helping to maximize the implementation of the duties and responsibilities of managing the Bank, the Board of Directors can form supporting organs in accordance with statutory provisions. The Board of Directors has formed a number of supporting organs, including Risk Management, Credit Policy Committee, Assets Liability Committee (ALCO), Information Technology Steering Committee, Operational Risk Management Committee, Product Committee, and Credit Committee. Information related to each of the Board of Directors' supporting organs is described as follows:

Risk Management Committee

The Risk Management Committee is a supporting organ of the Board of Directors whose role is to protect the Bank from losses that may be caused by operational activities, and is responsible for maintaining the amount of risk faced by the Bank, so that it is in accordance with the risk appetite set by the Bank's management.

Committee Charter

In carrying out its duties and responsibilities, the Risk Management Committee is guided by the General Risk Management Policy and the Internal Memo regarding the Improvement of the Composition of the Bank Sahabat Sampoerna Risk Management Committee.

Duties, Responsibilities, and Authorities of the Committee

The duties and responsibilities of the Risk Management Committee are to provide recommendations to the President Director regarding the following:

1. *Preparation of risk management policies and changes thereto, including risk management strategies, risk levels taken and risk tolerance, risk management frameworks, and contingency plans to anticipate abnormal conditions.*
2. *Improvement of the risk management process periodically or incidentally as a result of changes in the Bank's external and internal conditions that affect capital adequacy, the Bank's risk profile, and the ineffectiveness of risk management implementation based on evaluation results.*
3. *Determination of policies and/or business decisions that deviate from normal procedures, such as significant business expansion exceeding the Bank's previously established Business Plan or taking a position/risk exposure that exceeds the established limit.*

Kedudukan Komite

Secara struktural, kedudukan Komite Manajemen Risiko berada di bawah Direktur Kepatuhan & Manajemen Risiko. Dengan demikian, dalam pelaksanaan tugasnya, Komite Manajemen Risiko bertanggung jawab langsung kepada Direktur Utama Bank.

Komposisi dan Profil Komite

Adapun komposisi Komite Manajemen Risiko telah ditetapkan berdasarkan Surat Keputusan Direksi No. Skep-011/BSS/DIR/XI/2023 perihal Penetapan Anggota Komite Manajemen Risiko. Susunan dan komposisi Komite Manajemen Risiko adalah sebagai berikut:

Ketua (Merangkap Anggota Tetap) <i>Chairperson (Concurrently as Permanent Member)</i>	Direktur Kepatuhan & Manajemen Risiko <i>Compliance & Risk Management Director</i>
Koordinator (Anggota Tetap) <i>Coordinator (Permanent Member)</i>	Kepala Enterprise Risk, Analytics & Control <i>Head of Enterprise Risk, Analytics & Control</i>
Anggota Tetap <i>Permanent Member</i>	<ul style="list-style-type: none"> • Direktur Utama President Director • Direktur Teknologi Informasi Director of Information Technology • Direktur Bisnis UMKM MSME Business Director • Direktur Keuangan & Perencanaan Bisnis Financial and Business Planning Director • Chief Credit Officer • Chief SME & High End Business • Chief Human Capital Officer • Chief Digital Business • Chief Operations Officer • Chief of Internal Audit*)
Anggota Tidak Tetap <i>Non-Permanent Member</i>	Head of Divisions

*) Chief Internal Auditor sebagai anggota tetap, dalam hal ini berfungsi sebagai pihak independen yang dapat memberikan masukan terhadap penerapan manajemen risiko Bank. Organ tersebut tidak berfungsi sebagai pihak yang menyetujui (memberikan hak suara) terhadap kebijakan penerapan manajemen risiko yang akan diatur dan diberlakukan di Bank.
*) Chief Internal Auditor as a permanent member, in this case functions as an independent party who can provide input on the implementation of the Bank's risk management. The organ does not function as a party that approves (gives voting rights) on the implementation of risk management policies that will be regulated and enforced in the Bank.

Profil anggota Komite Manajemen Risiko telah diungkapkan pada Profil Pejabat Eksekutif dan Profil Kepala Satuan Kerja Manajemen Risiko di dalam Laporan Tahunan ini.

Position of the Committee

Structurally, the position of the Risk Management Committee is under the Director of Compliance & Risk Management. Thus, in carrying out its duties, the Risk Management Committee is directly responsible to the President Director of the Bank.

Committee Composition and Profile

The composition of the Risk Management Committee has been determined based on the Decree of the Board of Directors No. Skep-011/BSS/DIR/XI/2023 concerning the Determination of Members of the Risk Management Committee. The composition and structure of the Risk Management Committee are as follows:

The profile of the members of the Risk Management Committee has been disclosed in the Profile of Executive Officers and the Profile of the Head of the Risk Management Work Unit in this Annual Report.

Independensi

Anggota Komite Manajemen Risiko berkomitmen untuk mengutamakan sikap independensi, berlaku objektif, dan penuh kehati-hatian dalam pelaksanaan tugas dan tanggung jawabnya. Selain itu, komite ini senantiasa memastikan tidak memiliki benturan kepentingan dengan organ Bank lainnya dan tidak menerima intervensi dari para Pemegang Saham. Komitmen tersebut tercermin dalam pemenuhan aspek independensi sebagai berikut:

Independence

Members of the Risk Management Committee are committed to prioritizing an independent attitude, acting objectively, and being careful in carrying out their duties and responsibilities. In addition, this committee always ensures that it does not have a conflict of interest with other Bank organs and does not accept intervention from Shareholders. This commitment is reflected in the fulfillment of the following independence aspects:

Aspek Independensi <i>Independence Aspect</i>	Ketua (Merangkap Anggota Tetap) <i>Chairperson (Concurrently as Permanent Member)</i>	Koordinator (Anggota Tetap) <i>Coordinator (Permanent Member)</i>	Anggota Tetap <i>Permanent Member</i>	Anggota Tidak Tetap <i>Non-Permanent Member</i>
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. <i>Does not have financial relationships with the Board of Commissioners and the Board of Directors.</i>	√	√	√	√

Aspek Independensi <i>Independence Aspect</i>	Ketua (Merangkap Anggota Tetap) <i>Chairperson (Concurrently as Permanent Member)</i>	Koordinator (Anggota Tetap) <i>Coordinator (Permanent Member)</i>	Anggota Tetap <i>Permanent Member</i>	Anggota Tidak Tetap <i>Non-Permanent Member</i>
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. Does not have management relationship with Shareholders, Subsidiaries, and affiliated companies.	v	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. Does not have a share ownership relationship in the Bank.	v	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Manajemen Risiko. <i>Does not have family relationships with the Board of Commissioners, the Board of Directors, and/or among members of the Risk Management Committee.</i>	v	v	v	v

v : Terpenuhi Fulfilled
x : Tidak terpenuhi Unfulfilled

Pelaksanaan Tugas Komite di Tahun 2024

Sepanjang tahun 2024, Komite Manajemen Risiko melaksanakan tugas dan tanggung jawabnya, antara lain:

Implementation of Committee Duties in 2024

Throughout 2024, the Risk Management Committee carries out its duties and responsibilities, including:

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
Mengevaluasi dan memberikan rekomendasi atas penyusunan Kebijakan Manajemen Risiko, termasuk strategi manajemen risiko, tingkat risiko yang diambil dan toleransi risiko, kerangka manajemen risiko, serta rencana kontingensi untuk mengantisipasi terjadinya kondisi tidak normal <i>Evaluate and provide recommendations on the preparation of the Risk Management Policy, including risk management strategies, the level of risk taken and risk tolerance, risk management framework, and contingency plans to anticipate the occurrence of abnormal conditions</i>	<ul style="list-style-type: none"> Mendiskusikan dan mengevaluasi penilaian tingkat risiko Bank secara keseluruhan berdasarkan penilaian 8 jenis risiko Mendiskusikan dan mengevaluasi atas pelaksanaan monitoring terhadap limit Risk Appetite Statement (RAS) dan Limit Parameter Kredit Bank Discussed and evaluated the assessment of the Bank's overall risk level based on the assessment of 8 types of risk Discussed and evaluated the implementation of monitoring of the Risk Appetite Statement (RAS) limit and the Bank's Credit Parameter Limit
Mengevaluasi penyempurnaan proses manajemen risiko secara berkala maupun bersifat insidental sebagai akibat dari suatu perubahan kondisi eksternal dan internal Bank <i>Evaluate the improvement of the risk management process periodically or incidentally as a result of changes in external and internal conditions of the Bank.</i>	<ul style="list-style-type: none"> Memantau pelaksanaan penerapan manajemen risiko Bank berdasarkan penilaian tingkat risiko Bank secara keseluruhan Monitor the implementation of the Bank's risk management based on an assessment of the Bank's overall risk level
Mengevaluasi dan memberikan rekomendasi atas penyusunan Kebijakan Manajemen Risiko, termasuk strategi manajemen risiko, tingkat risiko yang diambil dan toleransi risiko, kerangka manajemen risiko, serta rencana kontingensi untuk mengantisipasi terjadinya kondisi tidak normal <i>Evaluate and provide recommendations on the preparation of the Risk Management Policy, including risk management strategies, the level of risk taken and risk tolerance, risk management framework, and contingency plans to anticipate the occurrence of abnormal conditions</i>	<ul style="list-style-type: none"> Mendiskusikan dan mengevaluasi penilaian tingkat risiko Bank secara keseluruhan berdasarkan penilaian 8 jenis risiko Mendiskusikan dan mengevaluasi atas pelaksanaan monitoring terhadap limit Risk Appetite Statement (RAS) dan Limit Parameter Kredit Bank Discussed and evaluated the assessment of the Bank's overall risk level based on the assessment of 8 types of risk Discussed and evaluated the implementation of monitoring of the Risk Appetite Statement (RAS) limits and the Bank's Credit Parameter Limits

Pelaksanaan Rapat Komite

Komite Manajemen Risiko dapat melaksanakan rapat internal minimal 1 (satu) kali dalam 3 (tiga) bulan atau dapat dilaksanakan sewaktu-waktu sesuai dengan kepentingan Bank. Sepanjang tahun 2024, Komite Manajemen Risiko telah melaksanakan rapat sebanyak 4 (empat) kali. Adapun rincian pelaksanaan dan agenda rapat Komite Manajemen Risiko di tahun 2024 dapat dilihat sebagai berikut:

Committee Meeting Implementation

The Risk Management Committee may hold internal meetings at least 1 time in 3 months or may be held at any time in accordance with the interests of the Bank. Throughout 2024, the Risk Management Committee has held meetings as many as 4 (four) times. The details of the implementation and agenda of the Risk Management Committee meetings in 2024 can be seen as follows:

Tanggal Date	Agenda Agenda
18 Maret March 18	<ul style="list-style-type: none"> Regulatory Update Pelaporan SKMR Evaluasi Profil Risiko Evaluasi RAS dan Limit Kredit Regulatory Update SKMR Reporting Risk Profile Evaluation RAS and Credit Limit Evaluation
10 Juni June 10	<ul style="list-style-type: none"> Regulatory Update SKMR Update
30 September September 30	<ul style="list-style-type: none"> Regulatory Update Pelaporan SKMR Profil Risiko, RAS, BMPK, dan RPIM ATMR dan KPMM Regulatory Update SKMR Reporting Risk Profile, RAS, LLL, and RPIM ATMR and KPMM
17 Desember December 17	<ul style="list-style-type: none"> Regulatory Update Pelaporan SKMR Profil Risiko, RAS, BMPK, dan RPIM ATMR dan KPMM Regulatory Update SKMR Reporting Risk Profile, RAS, LLL, and RPIM ATMR and KPMM

Rekomendasi

Komite Manajemen Risiko telah memberikan rekomendasi mengenai pengelolaan dan mitigasi risiko di internal Bank, sebagaimana tercatat dalam Notulen Rapat Komite Manajemen Risiko tahun 2024.

Recommendations

The Risk Management Committee has provided recommendations on risk management and mitigation within the Bank, as recorded in the Minutes of the Risk Management Committee Meeting in 2024.

Pengembangan Kompetensi

Bank Sahabat Sampoerna senantiasa memfasilitasi Komite Manajemen Risiko untuk mengikuti kegiatan pengembangan kompetensi untuk memperluas pemahaman mengenai pelaksanaan tugas dan tanggung jawabnya. Sepanjang tahun 2024, Komite Manajemen Risiko telah mengikuti sejumlah kegiatan pengembangan kompetensi yang diungkapkan sebagai berikut:

Competence Development

Bank Sahabat Sampoerna always facilitates the Risk Management Committee to participate in competency development activities to broaden their understanding of the implementation of their duties and responsibilities. Throughout 2024, the Risk Management Committee has participated in a number of competency development activities as disclosed as follows:

Topik Pelatihan Training Topic	Penyelenggara Organizer	Tanggal Pelatihan Training Date
Sertifikasi Majemen Risiko Jenjang 6 Risk Management Certification Level 6	Garda	21 Februari February 21
Sertifikasi Majemen Risiko Jenjang 7 Risk Management Certification Level 7	Garda	7 Oktober October 7
APU PPT & PPPSPM AML-CTF & PFPWMD	Bank Sahabat Sampoerna	7 November November 7

Mekanisme Pengangkatan dan Pemberhentian Anggota Komite

Proses pengangkatan dan pemberhentian Komite Manajemen Risiko Bank mengacu pada Surat Keputusan Direksi Bank tentang Penetapan Anggota Komite Manajemen Risiko, dan berpedoman pada Memorandum Internal mengenai Penyempurnaan Susunan Komite Manajemen Risiko Bank Sahabat Sampoerna.

Mechanism of Appointment and Dismissal of the Committee Members

The process of appointing and dismissing the Bank's Risk Management Committee refers to the Bank's Board of Directors' Decree on the Determination of Members of the Risk Management Committee, and is guided by the Internal Memorandum on the Improvement of the Composition of the Bank Sahabat Sampoerna Risk Management Committee.

Komite Kebijakan Perkreditan

Bank Sahabat Sampoerna membentuk Komite Kebijakan Perkreditan untuk membantu Direksi dalam menentukan kebijakan kredit, meliputi pengelolaan penyaluran kredit, jumlah portofolio kredit yang akan dikelola, dan strategi untuk mencapainya. Pembentukan Komite Kebijakan Perkreditan telah sesuai dengan POJK No. 42/POJK.03/2017 tanggal 12 Juli 2017 tentang Kewajiban Penyusunan dan Pelaksanaan Kebijakan Perkreditan atau Pembiayaan Bank bagi Bank Umum.

Piagam Komite

Dalam menjalankan tugas dan tanggung jawabnya, Komite Kebijakan Perkreditan telah memiliki pedoman kerja dengan mengacu kepada Memo No. 09/248a/MI/CP/I/2020 perihal Pedoman Pemberian Kredit (PPK) 2020 beserta perubahannya.

Tugas, Tanggung Jawab, dan Wewenang Komite

Fungsi dan tanggung jawab yang dilaksanakan oleh Komite Kebijakan Perkreditan dijelaskan sebagai berikut:

1. Fungsi Komite Kebijakan Perkreditan
 - a. Memberikan masukan kepada Direksi dalam penyusunan Kebijakan Perkreditan Bank, terutama yang berkaitan dengan perumusan prinsip kehati-hatian dalam perkreditan atau pembiayaan;
 - b. Mengawasi agar Kebijakan Perkreditan Bank dapat diterapkan dan dilaksanakan secara konsekuen dan konsisten serta merumuskan pemecahan dalam hal terdapat hambatan atau kendala dalam penerapan Kebijakan Perkreditan Bank;
 - c. Melakukan kajian berkala terhadap Kebijakan Perkreditan Bank dan memberikan saran kepada Direksi dalam hal diperlukan perubahan atau perbaikan kebijakan;
 - d. Memantau dan mengevaluasi:
 - Perkembangan dan kualitas portofolio perkreditan secara keseluruhan;
 - Kebenaran pelaksanaan kewenangan memutus kredit;
 - Kebenaran proses pemberian, perkembangan, dan kualitas kredit yang diberikan kepada pihak yang terkait dengan Bank serta debitur-debitur besar tertentu;
 - Kebenaran pelaksanaan ketentuan batas maksimum pemberian kredit;
 - Ketaatan terhadap ketentuan perundang-undangan dan peraturan lainnya dalam pelaksanaan pemberian kredit;
 - Penyelesaian kredit bermasalah sesuai dengan yang ditetapkan dalam Kebijakan Perkreditan Bank;
 - Upaya Bank dalam memenuhi kecukupan jumlah penyisihan penghapusan kredit; dan
 - e. Terhadap Kepala Satuan Kerja Audit Internal, sebagai anggota tetap, berfungsi sebagai pihak yang independen yang memberikan masukan terhadap Kebijakan Perkreditan Bank. Terkait hal ini,

Credit Policy Committee

The Credit Policy Committee plays a role in assisting the Board of Directors in determining credit policies, including managing loan disbursements, the amount of credit portfolio to be managed, and strategies to achieve them. This committee is established in accordance with Financial Services Authority Regulation No. 42/POJK.03/2017 dated July 12, 2017, regarding the Obligation to Prepare and Implement Credit Policies or Financing for Commercial Banks.

Charter of the Committee

In carrying out its duties and responsibilities, the Credit Policy Committee has a working guideline referring to Memo No. 09/248a/MI/CP/I/2020 concerning the 2020 Credit Granting Guidelines (PPK) and its amendments.

Duties, Responsibilities, and Authorities of the Committee

The functions and responsibilities carried out by the Credit Policy Committee are explained as follows:

1. *Functions of the Credit Policy Committee*
 - a. *Provide input to the Board of Directors in the preparation of the Bank's Credit Policy, especially those related to the formulation of the principle of prudence in credit or financing;*
 - b. *Supervise so that the Bank's Credit Policy can be implemented and carried out consistently and consistently and formulate solutions in the event of obstacles or constraints in the implementation of the Bank's Credit Policy;*
 - c. *Conduct periodic reviews of the Bank's Credit Policy and provide advice to the Board of Directors in the event that changes or improvements to the policy are needed;*
 - d. *Monitor and evaluate:*
 - *The development and quality of the credit portfolio as a whole;*
 - *The correctness of the implementation of the authority to decide on credit;*
 - *The correctness of the process of granting, development, and quality of credit given to parties related to the Bank and certain large debtors;*
 - *The correctness of the implementation of the provisions on the maximum credit limit;*
 - *Compliance with laws and other regulations in the implementation of credit provision;*
 - *Settlement of problem loans in accordance with those stipulated in the Bank's Credit Policy;*
 - *The Bank's efforts to meet the adequacy of the amount of credit write-off provisions; and*
 - e. *The Head of the Internal Audit Work Unit, as a permanent member, functions as an independent party that provides input on the Bank's Credit Policy. In this regard, the Internal Audit Work Unit does not*

Satuan Kerja Audit Internal tidak berfungsi sebagai pihak yang menyetujui kebijakan perkreditan yang akan diatur dan diberlakukan di Bank.

2. Tanggung jawab Komite Kebijakan Perkreditan
 - a. Menyampaikan laporan tertulis secara berkala kepada Direksi dengan tembusan kepada Dewan Komisaris mengenai:
 - Hasil pengawasan atas penerapan dan pelaksanaan Kebijakan Perkreditan Bank;
 - Hasil pemantauan dan evaluasi mengenai hal-hal yang di maksud dalam butir 1.d di atas; dan
 - b. Memberikan saran langkah-langkah perbaikan kepada Direksi dengan tembusan kepada Dewan Komisaris mengenai hal-hal yang terkait dengan butir 2.a di atas.

Kedudukan Komite

Secara struktural, Komite Kebijakan Perkreditan berada langsung di bawah Direktur Utama sehingga bertanggung jawab, berkoordinasi, dan menyampaikan Laporan Pelaksanaan Tugas secara langsung kepada Direksi Bank.

Komposisi dan Profil Komite

Komposisi keanggotaan Komite Kebijakan Perkreditan telah diungkapkan dalam Buku Pedoman Pemberian Kredit (PPK) tahun 2020 Bab X Organisasi Manajemen Perkreditan dan telah disesuaikan dengan standar penamaan jabatan di tingkat Board of Management berdasarkan pengkinian Organisasi Bankwide tahun 2023, yakni sebagai berikut:

Ketua (Merangkap Anggota Tetap) <i>Chairperson (Concurrently a Permanent Member)</i>	Direktur Utama <i>President Director</i>
Sekretaris (Merangkap Anggota) <i>Secretary (Concurrently a Member)</i>	Chief Credit Officer
Anggota Tetap <i>Permanent Member</i>	Direktur Kepatuhan & Manajemen Risiko <i>Director of Compliance & Risk Management</i>
Anggota Tidak Tetap <i>Non-Permanent Member</i>	Kepala Enterprise Risk, Analytics & Control Head of Enterprise Risk, Analytics & Control Kepala Divisi Satuan Kerja Kepatuhan Head of Compliance Work Unit Division ESME Credit Division Head SME & FI Credit Division Head Chief Internal Auditor Chief SME & High End Business Direktur Bisnis UMKM MSME Business Director Direktur Keuangan & Perencanaan Bisnis Financial and Business Director Financial Institution Division Head Lending & Fintech Product & Partnership Division Head

Profil anggota Komite Kebijakan Perkreditan telah diungkapkan pada Profil Pejabat Eksekutif, Profil Kepala Satuan Kerja Kepatuhan, dan Profil Kepala Satuan Kerja Manajemen Risiko di dalam Laporan Tahunan ini.

Independensi

Anggota Komite Kebijakan Perkreditan berkomitmen untuk mengutamakan sikap independensi, berlaku objektif, dan penuh kehati-hatian dalam pelaksanaan tugas dan tanggung jawabnya. Selain itu, komite ini senantiasa

function as a party that approves credit policies that will be regulated and enforced at the Bank.

2. Responsibilities of the Credit Policy Committee
 - a. Submitting written reports periodically to the Board of Directors with a copy to the Board of Commissioners regarding:
 - Results of supervision of the implementation and execution of the Bank's Credit Policy;
 - Results of monitoring and evaluation regarding the matters referred to in point 1.d above; and
 - b. Providing suggestions for corrective measures to the Board of Directors with a copy to the Board of Commissioners regarding matters related to point 2.a above.

Position of the Committee

Structurally, the Credit Policy Committee is directly under the President Director so that it is responsible, coordinates, and submits the Task Implementation Report directly to the Bank's Board of Directors.

Committee Composition and Profile

The composition of the Credit Policy Committee membership has been disclosed in the 2020 Credit Granting Guidelines (PPK) Chapter X Credit Management Organization and has been adjusted to the standard naming of positions at the Board of Management level based on the 2023 Bankwide Organization update, namely as follows:

The profile of the members of the Credit Policy Committee has been disclosed in the Profile of Executive Officers, Profile of the Head of Compliance Work Unit, and Profile of the Head of Risk Management Work Unit in this Annual Report.

Independence

Members of the Credit Policy Committee are committed to prioritizing an independent attitude, acting objectively, and being very careful in carrying out their duties and

memastikan tidak memiliki benturan kepentingan dengan organ Bank lainnya dan tidak menerima intervensi dari para Pemegang Saham. Komitmen tersebut tercermin dalam pemenuhan aspek independensi sebagai berikut.

responsibilities. In addition, this committee always ensures that it does not have a conflict of interest with other Bank organs and does not accept intervention from Shareholders. This commitment is reflected in the fulfillment of the independence aspects as follows.

Aspek Independensi <i>Independence Aspect</i>	Ketua (Merangkap Anggota Tetap) <i>(Concurrently a Permanent Member)</i>	Wakil Ketua (Merangkap Anggota) <i>Vice Chairman (Concurrently a Member)</i>	Sekretaris (Merangkap Anggota) <i>Secretary (Concurrently a Member)</i>	Anggota Tetap <i>Permanent Members</i>
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. <i>Does not have financial relationship with the Board of Commissioners and Board of Directors.</i>	v	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. <i>Does not have management relationship with Shareholders, Subsidiaries, and affiliated companies.</i>	v	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. <i>Does not have share ownership relationship in the Bank.</i>	v	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Manajemen Risiko. <i>Does not have any family relationship with the Board of Commissioners, Board of Directors, and/or fellow members of the Risk Management Committee.</i>	v	v	v	v

v : Terpenuhi Fulfilled
x : Tidak terpenuhi Unfulfilled

Pelaksanaan Tugas Komite di Tahun 2024

Sepanjang tahun 2024, Komite Kebijakan Perkreditan melaksanakan tugas dan tanggung jawabnya melalui sejumlah program, antara lain:

Implementation of Committee Duties in 2024

Throughout 2024, the Credit Policy Committee will carry out its duties and responsibilities through a number of programs, including:

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
Peningkatan kompetensi Risk <i>Risk competency improvement</i>	Pelaksanaan pelatihan sertifikasi Management Risiko , dilaksanakan 3 - 4 September 2024 <i>Implementation of Risk Management certification training, held September 3 - 4, 2024</i>
Pelaksanaan Review ketentuan pemberian kredit, sehingga dalam kondisi terupdated regulasi yang berlaku dan relevan dengan kondisi internal appetite BSS <i>Review of lending regulations, so that they are up-to-date with prevailing regulations and relevant to BSS' internal appetite</i>	Pelaksanaan <i>review</i> ketentuan kredit sepanjang tahun 2024 dilakukan terhadap: <ul style="list-style-type: none"> • Kebijakan Perkreditan Bank (KPB) • Ketentuan Asset Based Finance (ABF) • Parameter Monitoring Debitur <i>Finantial Institution</i> dan Perusahaan Rintisan • Proses pengikatan kredit (Matriks Pejabat Penandatanganan Dokumen Kredit) • Ketentuan Penerimaan Dokumen Agunan Sertipikat Elektronik • Ketentuan Pemeriksaan KTP-EL Melalui <i>Card Reader</i> • Perubahan Ketentuan Pembiayaan dan eskalasi • Penyempurnaan Format Perjanjian Kredit dan Perjanjian tambahan (<i>accessoir</i>) di BSS • Pedoman pemberian kredit dengan program KMG • Ketentuan Kunjungan Debitur Usaha Jaminan dan <i>Account Monitoring</i> <i>The implementation of the review of credit provisions throughout 2024 was carried out on:</i> <ul style="list-style-type: none"> • <i>Bank Credit Policy (KPB)</i> • <i>Asset Based Finance (ABF) provisions</i> • <i>Finantial Institution and Start-up Company Debtor Monitoring Parameters</i> • <i>Credit binding process (Matrix of Credit Document Signing Officer)</i> • <i>Provisions on Acceptance of Electronic Collateral Documents</i> • <i>Provisions for Checking ID Card through Card Reader</i> • <i>Changes in Financing Conditions and escalation</i> • <i>Improvement of Credit Agreement and accessoir Agreement Format in BSS</i> • <i>Guidelines for granting credit under the KMG program</i> • <i>Provisions on Collateral Business Debtor Visit and Account Monitoring</i>
Pelaksanaan Sosialisasi hasil review ketentuan pemberian kredit yang diberlakukan internal bank, kepada unit kerja terkait proses <i>Socialization of the results of the review of lending provisions imposed internally by the bank, to work units related to the process</i>	Pelaksanaan Sosialisasi kepada unit kerja terkait proses, dari hasil <i>review</i> ketentuan pemberian kredit yang dilakukan sepanjang tahun 2024, untuk di efektifkan diinternal bank pada periode tahun 2024 <i>Implementation of socialization to work units related to the process, from the results of the review of lending provisions carried out throughout 2024, to be effective within the bank in the 2024 period.</i>

Pelaksanaan Rapat Komite

Sepanjang tahun 2024, Komite Kebijakan Perkreditan telah melaksanakan rapat sebanyak 4 (empat) kali. Adapun rincian pelaksanaan dan agenda rapat Komite Kebijakan Perkreditan di tahun 2024 dapat dilihat sebagai berikut:

Tanggal Date	Agenda Agenda
23 Februari February 23	<ol style="list-style-type: none"> Update Perubahan Kebijakan (Periode Desember 2023 – Februari 2024) Inisiatif/Usulan terkait Perubahan Prosedur Kredit <ol style="list-style-type: none"> Policy Change Update (Period December 2023 - February 2024) Initiatives/Proposals related to Credit Procedure Changes
4 Juni June 4	<ol style="list-style-type: none"> Update Perubahan Kebijakan (Periode Maret – Mei 2024) Inisiatif/Usulan terkait Perubahan Prosedur Kredit <ol style="list-style-type: none"> Policy Change Update (Period March - May 2024) Initiatives/Proposals related to Credit Procedure Changes
11 September September 11	<ol style="list-style-type: none"> Update Perubahan Kebijakan (Periode Juni – September 2024) Inisiatif/Usulan terkait Perubahan Prosedur Kredit <ol style="list-style-type: none"> Policy Change Update (Period June - September 2024) Initiatives/Proposals related to Credit Procedure Changes
12 Desember December 12	<ol style="list-style-type: none"> Update Perubahan Policy (Periode 2024) Inisiatif/Usulan terkait Perubahan Prosedur Kredit <ol style="list-style-type: none"> Policy Change Update (Period 2024) Initiatives/Proposals related to Credit Procedure Changes

Rekomendasi

Berdasarkan pelaksanaan tugas sepanjang tahun 2024, Komite Kebijakan Perkreditan telah menyampaikan sejumlah rekomendasi terkait perumusan dan perbaikan kebijakan perkreditan, seperti:

- Review Kebijakan Perkreditan Bank
- Penyempurnaan Ketentuan Asset Based Finance (ABF)
- Perubahan Framework BWMK
- Penerimaan Dokumen Agunan Sertifikat Elektronik
- Pedoman pemberian kredit dengan program KMG
- Perubahan Parameter Monitoring Debitur Financial Institution dan Perusahaan Rintisan
- Pemeriksaan KTP Elektronik melalui Card Reader
- Perubahan Ketentuan Kunjungan Usaha dan Account Monitoring
- Penyempurnaan Format Perjanjian Kredit dan Perjanjian tambahan (*accessoir*) di BSS

Pengembangan Kompetensi

Bank Sahabat Sampoerna senantiasa memfasilitasi Komite Kebijakan Perkreditan untuk mengikuti kegiatan pengembangan kompetensi untuk memperluas pemahaman mengenai pelaksanaan tugas dan tanggung jawabnya. Sepanjang tahun 2024, Komite Kebijakan Perkreditan telah mengikuti sejumlah kegiatan pengembangan kompetensi yang diungkapkan sebagai berikut:

Committee Meeting Implementations

Throughout 2024, the Credit Policy Committee has held meetings as many as 4 (four) times. The details of the implementation and agenda of the Credit Policy Committee meetings in 2024 can be seen as follows:

Recommendations

Based on the implementation of tasks throughout 2024, the Credit Policy Committee has submitted a number of recommendations regarding the formulation and improvement of credit policies, such as:

- Review of the Bank's Credit Policy
- Refinement of Asset Based Finance (ABF) Provisions
- Amendment to BWMK Framework
- Acceptance of Electronic Certificate Collateral Documents
- Guidelines for granting credit with KMG program
- Changes in Monitoring Parameters for Financial Institution Debtors and Start-up Companies
- Electronic ID Card Check through Card Reader
- Changes in Business Visit and Account Monitoring Provisions
- Improvement of Credit Agreement and *accessoir* Agreement Format at BSS

Competence Development

Bank Sahabat Sampoerna always facilitates the Credit Policy Committee to participate in competency development activities to broaden their understanding of the implementation of their duties and responsibilities. Throughout 2024, the Credit Policy Committee has participated in a number of competency development activities as stated below:

Topik Pelatihan <i>Training Topic</i>	Penyelenggara <i>Organizer</i>	Tanggal Pelatihan <i>Training Date</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 <i>Risk Management Certification Training & Test Level 7</i>	Garda	5 Februari <i>February 5</i>
Disruptive Innovation Workshop <i>Disruptive Innovation Workshop</i>	Bank Sahabat Sampoerna	11 Januari <i>January 11</i>
Training Advance Credit Analyst SME Business <i>Training Advance Credit Analyst SME Business</i>	Bank Sahabat Sampoerna	19 Juli <i>July 19</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 5 <i>Risk Management Certification Training & Test Level 5</i>	Garda	14 Maret <i>March 14</i>

Mekanisme Pengangkatan dan Pemberhentian Anggota Komite

Proses pengangkatan dan pemberhentian Komite Kebijakan Perkreditan Bank mengacu pada Surat Keputusan Direksi Bank tentang Penetapan Anggota Komite Kebijakan Perkreditan dan berpedoman pada Memorandum Internal mengenai Penyempurnaan Susunan Komite Kebijakan Perkreditan Bank Sahabat Sampoerna.

ALCO

Bank Sahabat Sampoerna membentuk *Assets Liability Committee* (ALCO) sebagai organ pendukung Direksi yang bertanggung jawab untuk mengelola aset dan liabilitas, serta membantu menetapkan lending dan *funding rate* yang sesuai. ALCO juga bertanggung jawab dalam melakukan analisa terkait *maturity gap*, analisa *cash flow*, strategi atas pengelolaan aset dan liabilitas, dampak terhadap rentabilitas Bank, posisi devisa bersih, serta kondisi likuiditas Bank terhadap struktur pendanaan dengan memperhatikan faktor-faktor eksternal.

Piagam Komite

Dalam melaksanakan tugas dan tanggung jawabnya, ALCO senantiasa berpedoman pada Kebijakan Khusus Tresuri.

Tugas, Tanggung Jawab, dan Wewenang Komite

Berdasarkan Kebijakan Khusus Tresuri yang berfungsi sebagai pedoman kerja, ALCO memiliki tugas dan tanggung jawab untuk mengevaluasi, memantau, dan membuat prakiraan (proforma) kinerja Bank di masa mendatang berkaitan dengan kinerja pengelolaan risiko yang melekat pada aset dan liabilitas. Hal tersebut timbul karena adanya ketidakseimbangan neraca (aset dan liabilitas) dan/atau ketidakseimbangan arus kas (penerimaan dan pembayaran).

Kedudukan Komite

Secara struktural, kedudukan ALCO berada di bawah Direktur Utama dan bertanggung jawab secara langsung kepada Direktur Utama terkait pelaksanaan tugas dan tanggung jawab selama tahun buku.

Mechanism for Appointment and Dismissal of Committee Members

The process of appointment and dismissal of the Bank's Credit Policy Committee refers to the Decree of the Bank's Board of Directors on the Determination of Members of the Credit Policy Committee and is guided by the Internal Memorandum on the Improvement of the Composition of the Bank Sahabat Sampoerna Credit Policy Committee.

ALCO

Bank Sahabat Sampoerna has established the Assets Liability Committee (ALCO) as a Board of Directors-supporting organ, responsible for managing assets and liabilities and assisting in setting appropriate lending and funding rates. Additionally, ALCO is responsible for conducting analyses related to maturity gaps, cash flow analysis, asset and liability management strategies, impact on the Bank's profitability, net foreign exchange position, and the Bank's liquidity conditions against funding structures, considering external factors.

Charter of Committee

In carrying out its duties and responsibilities, ALCO always refers to the Special Treasury Policy.

Duties, Responsibilities, and Authority of the Committee

Based on the Special Treasury Policy which serves as a work guideline, ALCO has the duty and responsibility to evaluate, monitor, and make forecasts (proforma) of the Bank's future performance related to the performance of risk management inherent in assets and liabilities. This arises due to an imbalance in the balance sheet (assets and liabilities) and/or an imbalance in cash flow (receipts and payments).

Position of the Committee

Structurally, ALCO's position is under the President Director and is directly responsible to the President Director regarding the implementation of duties and responsibilities during the financial year.

Komposisi dan Profil Komite

Komposisi keanggotaan ALCO pada tahun 2024 telah tercantum dalam Kebijakan Khusus Tresuri BSS/KK-TRS/TRS/03 yang berlaku sejak Oktober 2022. Adapun komposisi Komite dapat dilihat sebagai berikut:

Ketua (Merangkap Anggota Tetap) <i>Chairperson (Concurrently as Permanent Members)</i>	Direktur Utama <i>President Director</i>
Wakil Ketua (Merangkap Anggota) <i>Deputy (Concurrently as Members)</i>	Direktur yang membawahi Treasury & International Banking <i>Director in charge of Treasury & International Banking Director in charge of Treasury & International Banking</i>
Sekretaris (Merangkap Anggota) <i>Secretary (Concurrently as Members)</i>	Treasury & International Banking Head
Anggota Tetap <i>Permanent Members</i>	<ul style="list-style-type: none"> • Direktur Kepatuhan & Manajemen Risiko <i>Compliance & Risk Management Director</i> • Chief SME & High End Business • Chief Credit Officer • ESME Business • Chief Internal Auditor • Sales Management Division Head • Financial Institution Division Head • Funding Business Division Head • Network Management Division Head • Finance, Accounting & Tax Division Head • Corporate Planning Division Head • Funding & Bancassurance Business Development Division Head • Enterprise Risk, Analytics & Control Division Head • Treasury & ALCO Manager

Profil anggota ALCO telah diungkapkan pada Profil Pejabat Eksekutif dalam Bab Profil Perusahaan pada Laporan Tahunan ini.

Independensi

Anggota ALCO berkomitmen untuk mengutamakan sikap independensi, berlaku objektif, dan penuh kehati-hatian dalam pelaksanaan tugas dan tanggung jawabnya. Selain itu, komite ini senantiasa memastikan tidak memiliki benturan kepentingan dengan organ Bank lainnya dan tidak menerima intervensi dari para Pemegang Saham. Komitmen tersebut tercermin dalam pemenuhan aspek independensi sebagai berikut.

Committee Composition and Profile

The composition of ALCO membership in 2024 has been stated in the Special Treasury Policy BSS/KK-TRS/TRS/03 which has been in effect since October 2022. The composition of the Committee can be seen as follows:

The profiles of ALCO members have been disclosed in the Executive Officer Profiles in the Company Profile Chapter of this Annual Report.

Independence

ALCO members are committed to prioritizing an independent attitude, acting objectively, and being careful in carrying out their duties and responsibilities. In addition, this committee always ensures that it does not have a conflict of interest with other Bank organs and does not accept intervention from Shareholders. This commitment is reflected in the fulfillment of the independence aspects as follows.

Aspek Independensi <i>Independence Aspect</i>	Ketua (Merangkap Anggota Tetap) <i>Chairman (Concurrently Permanent Member)</i>	Wakil Ketua (Merangkap Anggota) <i>Vice Chairman (Concurrently Member)</i>	Sekretaris (Merangkap Anggota) <i>Secretary (Concurrently Member)</i>	Anggota Tetap <i>Permanent Member</i>
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. <i>Has no financial relationship with the Board of Commissioners and Board of Directors.</i>	v	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. <i>Has no management relationship with Shareholders, Subsidiaries, or affiliated companies.</i>	v	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. <i>Has no share ownership relationship in the Bank.</i>	v	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota ALCO. <i>Has no family relationship with the Board of Commissioners, Board of Directors, and/or fellow ALCO members.</i>	v	v	v	v

v : Terpenuhi Yes

x : Tidak terpenuhi No

Pelaksanaan Tugas Komite di Tahun 2024

Sepanjang tahun 2024, ALCO telah melaksanakan tugas dan tanggung jawabnya melalui sejumlah kegiatan, seperti:

1. Melakukan rapat secara rutin setiap bulan.
2. Memberikan pandangan perekonomian global dan domestik untuk keselarasan strategi bisnis.
3. Menetapkan suku bunga simpanan dan kredit, melakukan evaluasi kinerja Bank selama tahun 2024.
4. Membuat perkiraan prospek bisnis Bank pada tahun 2024.

Pelaksanaan Rapat Komite

Berdasarkan pedoman kerja, ALCO wajib melaksanakan rapat sekurang-kurangnya sebanyak 1 (satu) kali dalam 1 (satu) bulan atau sewaktu-waktu disesuaikan dengan kebutuhan Bank. Sepanjang tahun 2024, ALCO telah melaksanakan rapat sebanyak 13 (tiga belas) kali. Adapun rincian pelaksanaan dan agenda rapat Komite Kebijakan Perkreditan di tahun 2024 dapat dilihat sebagai berikut:

Implementation of Committee Duties in 2024

Throughout 2024, ALCO has carried out its duties and responsibilities through a number of activities, such as:

1. Conducting regular monthly meeting.
2. Providing global and domestic economic views for business strategy alignment.
3. Setting deposit and credit interest rates, evaluating the Bank's performance throughout 2023.
4. Forecasting the Bank's business prospects in 2024.

Committee Meetings

Based on the work guidelines, ALCO is required to hold meetings at least 1 (one) time in 1 (one) month or at any time adjusted to the Bank's needs. Throughout 2024, ALCO has held 13 (thirteen) meetings. The details of the implementation and agenda of the Credit Policy Committee meetings in 2024 can be seen as follows:

Tanggal Date	Agenda Agenda
22 Januari January 22	<ul style="list-style-type: none"> • Penyampaian outlook ekonomi, proyeksi keuangan bank dan evaluasi risiko bisnis di bulan Desember 2023 s.d Januari 2024. • Suku bunga simpanan (giro, tabungan dan deposito) Rupiah dipertahankan tetap. • Perubahan matrik kewenangan pemberian special rate TD untuk bulan Februari 2024 diturunkan 25bps, menjadi sebagai berikut: <ul style="list-style-type: none"> > Untuk RIM ≤ 98%, Authority Matrix (A) dari > 0,75% menjadi > 0,50% > Untuk RIM ≤ 98%, Authority Matrix (B) dari ≤ 0,75% menjadi ≤ 0,50% > Untuk RIM > 98%, Authority Matrix (A) dari > 1,25% menjadi > 1,00% > Untuk RIM > 98%, Authority Matrix (B) dari ≤ 1,25% menjadi ≤ 1,00% • Submission of economic outlook, bank financial projections and business risk evaluation in December 2023 to January 2024. • Rupiah savings interest rates (current accounts, savings and deposits) are maintained. • Changes in the authority matrix for granting TD special rates for February 2024 have been reduced by 25bps, to the following: <ul style="list-style-type: none"> > For RIM ≤ 98%, Authority Matrix (A) from > 0.75% to > 0.50% > For RIM ≤ 98%, Authority Matrix (B) from ≤ 0.75% to ≤ 0.50% > For RIM > 98%, Authority Matrix (A) from > 1.25% to > 1.00% > For RIM > 98%, Authority Matrix (B) from ≤ 1.25% to ≤ 1.00%
19 Februari February 19	<ul style="list-style-type: none"> • Penyampaian outlook ekonomi, proyeksi keuangan bank dan evaluasi risiko bisnis di bulan Januari 2024 s.d Februari 2024. • Suku bunga simpanan (giro, tabungan dan deposito) Rupiah dipertahankan tetap. • Evaluasi proporsi dana DPK dan arahan untuk penurunan COF. • Submission of economic outlook, bank financial projections and business risk evaluation in January 2024 to February 2024. • Rupiah savings interest rates (current accounts, savings and deposits) are maintained. • Evaluation of the proportion of DPK funds and directions for reducing COF.
18 Maret March 18	<ul style="list-style-type: none"> • Penyampaian outlook ekonomi, proyeksi keuangan bank dan evaluasi risiko bisnis di bulan Februari 2024 s.d Maret 2024. • Suku bunga simpanan (giro, tabungan dan deposito) Rupiah dipertahankan tetap. • Penetapan internal appetite untuk rasio likuiditas dan berbagai inisiatif bisnis yang dapat meningkatkan rasio alat likuid Bank. • Mendapatkan izin dari OJK untuk dapat melakukan kegiatan usaha dalam valuta asing (Bank Devisa) • Submission of economic outlook, bank financial projections and evaluation of business risks in February 2024 to March 2024. • Rupiah savings interest rates (current accounts, savings and deposits) are maintained constant. • Determination of internal appetite for liquidity ratios and various business initiatives that can increase the Bank's liquid asset ratio. • Obtaining permission from OJK to be able to conduct business activities in foreign currency (Foreign Exchange Bank)

Tanggal Date	Agenda Agenda																																													
22 April April 22	<ul style="list-style-type: none"> Penyampaian outlook ekonomi, proyeksi keuangan bank dan evaluasi risiko bisnis di bulan Maret 2024 s.d April 2024. Suku bunga simpanan (giro, tabungan dan deposito) Rupiah dipertahankan tetap. Perubahan acuan matrik kewenangan pemberian special rate TD untuk bulan April 2024 dari RIM menjadi AL/DPK, sebagaimana berikut: <ul style="list-style-type: none"> Acuan RIM $\leq 98\%$ menjadi AL/DPK $> 14\%$ Acuan RIM $> 98\%$ menjadi AL/DPK $\leq 14\%$ Tingkat RIM yang digunakan yaitu RIM satu hari kerja sebelumnya, menjadi Tingkat AL/DPK yang digunakan yaitu AL/DPK dua hari kerja sebelumnya Untuk besaran kewenangan masih diusulkan tetap Submission of economic outlook, bank financial projections and evaluation of business risks in March 2024 to April 2024. Rupiah savings interest rates (current accounts, savings and deposits) are maintained constant. Changes in the reference matrix for the authority to provide special TD rates for April 2024 from RIM to AL/DPK, as follows: <ul style="list-style-type: none"> RIM reference $\leq 98\%$ becomes AL/DPK $> 14\%$ RIM reference $> 98\%$ becomes AL/DPK $\leq 14\%$ The RIM rate used is the RIM one working day before, becoming the AL/DPK rate used is AL/DPK two working days before The amount of authority remains for approval 																																													
20 Mei May 20	<ul style="list-style-type: none"> Penyampaian outlook ekonomi, proyeksi keuangan bank dan evaluasi risiko bisnis di bulan April 2024 s.d Mei 2024. Suku bunga simpanan (giro, tabungan dan deposito) Rupiah dipertahankan tetap. Mempertimbangkan untuk pendanaan lain selain DPK. Submission of economic outlook, bank financial projections and business risk evaluation in April 2024 to May 2024. Rupiah savings interest rates (current accounts, savings and deposits) are maintained. Considering other funding besides DPK. 																																													
24 Juni June 24	<ul style="list-style-type: none"> Penyampaian outlook ekonomi, proyeksi keuangan bank dan evaluasi risiko bisnis di bulan Mei 2024 s.d Juni 2024. Suku bunga simpanan (giro, tabungan dan deposito) Rupiah dipertahankan tetap. Penyempurnaan ketentuan Pembelian Surat Berharga Korporasi. Submission of economic outlook, bank financial projections and business risk evaluation in May 2024 to June 2024. Rupiah savings interest rates (current accounts, savings and deposits) are maintained constant. Improvement of provisions for Purchase of Corporate Securities. 																																													
22 Juli July 22	<ul style="list-style-type: none"> Penyampaian outlook ekonomi, proyeksi keuangan bank dan evaluasi risiko bisnis di bulan Juni 2024 s.d Juli 2024. Suku bunga simpanan (giro, tabungan dan deposito) Rupiah dipertahankan tetap. Kaji ulang formula penentuan table rate CASA dan TD Rupiah. Submission of economic outlook, bank financial projections and business risk evaluation in June 2024 to July 2024. Rupiah savings interest rates (current accounts, savings and deposits) are maintained constant. Review the formula for determining the CASA and TD Rupiah table rates. 																																													
19 Agustus August 19	<ul style="list-style-type: none"> Penyampaian outlook ekonomi, proyeksi keuangan bank dan evaluasi risiko bisnis di bulan Juli 2024 s.d Agustus 2024. Submission of economic outlook, bank financial projections and business risk evaluation in July 2024 to August 2024. Suku bunga simpanan (giro, tabungan dan deposito) Rupiah dipertahankan tetap. Rupiah savings interest rates (current accounts, savings and deposits) are maintained constant Mempertimbangkan penawaran Bilateral Loan dari counterparty, sebagai alternatif pendanaan lain selain DPK. 3) Consider Bilateral Loan offers from counterparties, as an alternative funding other than DPK Go live Bank Devisa dengan membuka layanan mata uang USD. 4) Go live Foreign Exchange Bank by opening USD currency services Penetapan suku bunga simpanan (giro, tabungan dan deposito) USD sebagaimana berikut: Determination of USD savings interest rates (current accounts, savings and deposits) as follows: <table border="1" data-bbox="432 1615 1214 2033"> <thead> <tr> <th colspan="2">Giro Valas</th> <th colspan="2">Tabungan Valas</th> </tr> <tr> <th>Nominal (USD)</th> <th>(% pa)</th> <th>Nominal (USD)</th> <th>(% pa)</th> </tr> </thead> <tbody> <tr> <td>< 10.000</td> <td>0,00</td> <td>< 1.000</td> <td>0,00</td> </tr> <tr> <td>10.000 - < 100.000</td> <td>0,20</td> <td>1.000 - < 10.000</td> <td>0,10</td> </tr> <tr> <td>100.000 - < 500.000</td> <td>0,25</td> <td>10.000 - < 100.000</td> <td>0,20</td> </tr> <tr> <td>≥ 500.000</td> <td>0,50</td> <td>≥ 100.000</td> <td>0,50</td> </tr> </tbody> </table> <table border="1" data-bbox="432 1872 1214 2033"> <thead> <tr> <th colspan="2">Deposito Valas</th> <th colspan="4">(% pa)</th> </tr> <tr> <th>Nominal (USD)</th> <th>1 mo</th> <th>3 mo</th> <th>6 mo</th> <th>12 mo</th> </tr> </thead> <tbody> <tr> <td>1.000 - < 100.000</td> <td>1,25</td> <td>1,25</td> <td>1,25</td> <td>1,25</td> </tr> <tr> <td>≥ 100.000</td> <td>2,25</td> <td>2,25</td> <td>2,25</td> <td>2,25</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Penetapan suku bunga RAK USD sebesar 2,5%. Determination of USD RAK interest rates at 2.5%. 	Giro Valas		Tabungan Valas		Nominal (USD)	(% pa)	Nominal (USD)	(% pa)	< 10.000	0,00	< 1.000	0,00	10.000 - < 100.000	0,20	1.000 - < 10.000	0,10	100.000 - < 500.000	0,25	10.000 - < 100.000	0,20	≥ 500.000	0,50	≥ 100.000	0,50	Deposito Valas		(% pa)				Nominal (USD)	1 mo	3 mo	6 mo	12 mo	1.000 - < 100.000	1,25	1,25	1,25	1,25	≥ 100.000	2,25	2,25	2,25	2,25
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Tanggal Date	Agenda Agenda																																													
23 September September 23	<ul style="list-style-type: none"> • Penyampaian outlook ekonomi, proyeksi keuangan bank dan evaluasi risiko bisnis di bulan Agustus 2024 s.d September 2024. • Suku bunga simpanan (giro, tabungan dan deposito) Rupiah dan USD dipertahankan tetap. • Penambahan likuiditas dari bilateral loan senilai total Rp650 Miliar dengan jangka waktu 3 (tiga) tahun. • Pembelian SRBI sebagai salah satu komponen Surat Berharga Negara yang masuk dalam klasifikasi asset likuid • <i>Submission of economic outlook, bank financial projections and business risk evaluation in August 2024 to September 2024.</i> • <i>Rupiah and USD savings interest rates (current accounts, savings and deposits) are maintained constant.</i> • <i>Additional liquidity from bilateral loans totaling Rp650 billion with a term of 3 (three) years.</i> • <i>Purchase of SRBI as one of the components of Government Securities that are included in the liquid asset classification</i> 																																													
21 Oktober October 21	<ul style="list-style-type: none"> • Penyampaian outlook ekonomi, proyeksi keuangan bank dan evaluasi risiko bisnis di bulan September 2024 s.d Oktober 2024. <i>Submission of economic outlook, bank financial projections and business risk evaluation in September 2024 to October 2024.</i> • Suku bunga simpanan (giro, tabungan dan deposito) Rupiah dan USD dipertahankan tetap. <i>Rupiah and USD savings interest rates (current accounts, savings and deposits) are maintained constant.</i> • Penetapan suku bunga simpanan (giro, tabungan dan deposito) SGD yang akan diberlakukan mulai tanggal 1 November 2024 sebagaimana berikut: <i>Stipulation of savings interest rates (current accounts, savings and deposits) SGD which will be enforced starting November 1, 2024 as follows:</i> <table border="1" data-bbox="517 875 1291 1272"> <thead> <tr> <th colspan="2" data-bbox="517 875 852 920">Giro Valas</th> <th colspan="2" data-bbox="956 875 1291 920">Tabungan Valas</th> </tr> <tr> <th data-bbox="517 920 692 965">Nominal (SGD)</th> <th data-bbox="692 920 852 965">(% pa)</th> <th data-bbox="956 920 1131 965">Nominal (SGD)</th> <th data-bbox="1131 920 1291 965">(% pa)</th> </tr> </thead> <tbody> <tr> <td data-bbox="517 965 692 999">< 10.000</td> <td data-bbox="692 965 852 999">0,10</td> <td data-bbox="956 965 1131 999">< 1.000</td> <td data-bbox="1131 965 1291 999">0,10</td> </tr> <tr> <td data-bbox="517 999 692 1032">10.000 - < 100.000</td> <td data-bbox="692 999 852 1032">0,10</td> <td data-bbox="956 999 1131 1032">1.000 - < 10.000</td> <td data-bbox="1131 999 1291 1032">0,10</td> </tr> <tr> <td data-bbox="517 1032 692 1066">100.000 - < 500.000</td> <td data-bbox="692 1032 852 1066">0,15</td> <td data-bbox="956 1032 1131 1066">10.000 - < 100.000</td> <td data-bbox="1131 1032 1291 1066">0,10</td> </tr> <tr> <td data-bbox="517 1066 692 1099">≥ 500.000</td> <td data-bbox="692 1066 852 1099">0,20</td> <td data-bbox="956 1066 1131 1099">≥ 100.000</td> <td data-bbox="1131 1066 1291 1099">0,10</td> </tr> </tbody> </table> <table border="1" data-bbox="517 1122 1291 1272"> <thead> <tr> <th colspan="2" data-bbox="517 1122 852 1167">Deposito Valas</th> <th colspan="4" data-bbox="852 1122 1291 1167">(% pa)</th> </tr> <tr> <th data-bbox="517 1167 852 1211">Nominal (SGD)</th> <th data-bbox="852 1167 956 1211">1 mo</th> <th data-bbox="956 1167 1059 1211">3 mo</th> <th data-bbox="1059 1167 1163 1211">6 mo</th> <th data-bbox="1163 1167 1291 1211">12 mo</th> </tr> </thead> <tbody> <tr> <td data-bbox="517 1211 852 1245">1.000 - < 100.000</td> <td data-bbox="852 1211 956 1245">0,25</td> <td data-bbox="956 1211 1059 1245">0,25</td> <td data-bbox="1059 1211 1163 1245">0,25</td> <td data-bbox="1163 1211 1291 1245">0,25</td> </tr> <tr> <td data-bbox="517 1245 852 1279">≥ 100.000</td> <td data-bbox="852 1245 956 1279">0,50</td> <td data-bbox="956 1245 1059 1279">0,50</td> <td data-bbox="1059 1245 1163 1279">0,50</td> <td data-bbox="1163 1245 1291 1279">0,50</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • Penetapan suku bunga RAK SGD sebesar 1%. <i>Determination of RAK SGD interest rate of 1%.</i> • Simulasi perhitungan ATMR Risiko Pasar untuk transaksi valas. <i>Simulation of Market Risk ATMR calculation for foreign exchange transactions</i> 	Giro Valas		Tabungan Valas		Nominal (SGD)	(% pa)	Nominal (SGD)	(% pa)	< 10.000	0,10	< 1.000	0,10	10.000 - < 100.000	0,10	1.000 - < 10.000	0,10	100.000 - < 500.000	0,15	10.000 - < 100.000	0,10	≥ 500.000	0,20	≥ 100.000	0,10	Deposito Valas		(% pa)				Nominal (SGD)	1 mo	3 mo	6 mo	12 mo	1.000 - < 100.000	0,25	0,25	0,25	0,25	≥ 100.000	0,50	0,50	0,50	0,50
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30 Oktober October 30	<p>Penyesuaian perhitungan SBDK mengacu pada ketentuan baru yang tertuang dalam POJK No 13/2024. <i>Adjustment of SBDK calculation refers to the new provisions contained in POJK No. 13/2024</i></p>																																													
18 November November 18	<ul style="list-style-type: none"> • Penyampaian outlook ekonomi, proyeksi keuangan bank dan evaluasi risiko bisnis di bulan Oktober 2024 s.d November 2024. • Suku bunga simpanan (giro, tabungan dan deposito) Rupiah, USD, dan SGD dipertahankan tetap. • Suku bunga RAK tetap dimana Rupiah sebesar 9%, USD sebesar 2,5% dan SGD sebesar 1%. • Simulasi kesediaan likuiditas menjelang akhir tahun 2024. • Strategi menekan COF dan perubahan komposisi DPK dengan meningkatkan CASA • <i>Submission of economic outlook, bank financial projections and business risk evaluation in October 2024 to November 2024.</i> • <i>Deposit interest rates (current accounts, savings and deposits) in Rupiah, USD, and SGD are maintained constant.</i> • <i>RAK interest rates remain where Rupiah is 9%, USD is 2.5% and SGD is 1%.</i> • <i>Simulation of liquidity availability towards the end of 2024.</i> • <i>Strategy to suppress COF and changes in DPK composition by increasing CASA</i> 																																													
17 Desember December 17	<ul style="list-style-type: none"> • Penyampaian outlook ekonomi, proyeksi keuangan bank dan evaluasi risiko bisnis di bulan November 2024 s.d Desember 2024. • Suku bunga simpanan (giro, tabungan dan deposito) Rupiah, USD, dan SGD dipertahankan tetap. • Suku bunga RAK tetap dimana Rupiah sebesar 9%, USD sebesar 2,5% dan SGD sebesar 1%. • Penyampaian data SBDK menggunakan perhitungan baru di POJK 13/2024 menggunakan data bulan November 2024, yang akan dilaporkan awal bulan Januari 2025. • <i>Submission of economic outlook, bank financial projections and business risk evaluation in November 2024 to December 2024.</i> • <i>Deposit interest rates (current accounts, savings and deposits) in Rupiah, USD, and SGD are maintained constant.</i> • <i>RAK interest rates remain where Rupiah is 9%, USD is 2.5% and SGD is 1%.</i> • <i>Submission of SBDK data using new calculations in POJK 13/2024 using data from November 2024, which will be reported in early January 2025.</i> 																																													

Rekomendasi

Di tahun 2024, ALCO telah menyampaikan sejumlah rekomendasi, di antaranya:

1. Melakukan pengelolaan portofolio asset dengan baik untuk memperoleh *return* yang optimal.
2. Melakukan pemantauan risiko atas konsentrasi pendanaan besar terutama porsi deposito inti.
3. Melakukan optimalisasi profitabilitas dengan mengurangi porsi dana mahal (TD) dan meningkatkan porsi dana murah (CASA) Bank.
4. Meningkatkan porsi alat likuid yang dimiliki dengan memperbesar porsi pendanaan stabil, memperbaiki komposisi DPK Individu & Korporasi, dan menambah Surat Berharga Negara yang dimiliki
5. Melakukan *selective lending* untuk mengurangi exposure risiko kredit
6. Melakukan penyesuaian perhitungan SBDK sesuai ketentuan regulator
7. Menetapkan STP untuk mata uang USD dan SGD sebagai Implementasi Bank Devisa
8. Melakukan berbagai inisiatif bisnis yang mendukung tercapainya target perusahaan

Pengembangan Kompetensi

Bank Sahabat Sampoerna senantiasa memfasilitasi ALCO untuk mengikuti kegiatan pengembangan kompetensi untuk memperluas pemahaman mengenai pelaksanaan tugas dan tanggung jawabnya. Sepanjang tahun 2024, ALCO telah mengikuti sejumlah kegiatan pengembangan kompetensi yang diungkapkan sebagai berikut:

Topik Pelatihan <i>Training Topics</i>	Penyelenggara <i>Organizer</i>	Tanggal Pelatihan <i>Training Date</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 <i>Risk Management Certification Training & Exam Level 7</i>	Garda	5 Februari <i>February 5</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 5 <i>Risk Management Certification Training & Exam Level 5</i>	Garda	12 Februari <i>February 12</i>
Pelatihan Teknis Pelaporan Antasena - Persiapan Bank Devisa <i>Antasena Reporting Technical Training - Foreign Exchange Bank Preparation</i>	Bank Panin	21 Juni <i>June 21</i>
Training Advance Credit Analyst SME Business <i>SME Business Advance Credit Analyst Training</i>	Bank Sahabat Sampoerna	12 Juli <i>July 12</i>
Workshop PSAK109 : Instrumen Keuangan <i>PSAK109 Workshop: Financial Instruments</i>	IAPI	18 Juli <i>July 18</i>
Learning from Milestones: Strategic Collaboration for Continuous Improvement <i>Learning from Milestones: Strategic Collaboration for Continuous Improvement</i>	Bank Sahabat Sampoerna	3 Oktober <i>October 3</i>
Training Rencana Aksi Keuangan Berkelanjutan (RAKB) <i>Sustainable Financial Action Plan (RAKB) Training</i>	LPPI	11 Juli <i>July 11</i>

Mekanisme Pengangkatan dan Pemberhentian Anggota Komite

Proses pengangkatan dan pemberhentian ALCO Bank mengacu pada Surat Keputusan Direksi Bank tentang Penetapan Anggota ALCO dan berpedoman pada Memorandum Internal mengenai Penyempurnaan Susunan ALCO Bank Sahabat Sampoerna.

Recommendation

In 2024, ALCO has submitted a number of recommendations, including:

1. Manage asset portfolios well to obtain optimal returns.
2. Monitor risks on large funding concentrations, especially the portion of core depositors.
3. Optimize profitability by reducing the portion of expensive funds (TD) and increasing the portion of low-cost funds (CASA) of the Bank.
4. Increase the portion of liquid assets owned by increasing the portion of stable funding, improving the composition of Individual & Corporate DPK, and increasing Government Securities owned
5. Conduct selective lending to reduce credit risk exposure
6. Adjust the calculation of SBDK according to regulatory provisions
7. Determine STP for USD and SGD currencies as the Implementation of Foreign Exchange Banks
8. Carry out various business initiatives that support the achievement of company targets.

Competency Development

Bank Sahabat Sampoerna always facilitates ALCO to participate in competency development activities to broaden understanding regarding the implementation of its duties and responsibilities. Throughout 2024, ALCO has participated in a number of competency development activities as stated below:

Mechanism of Appointment and Dismissal of Committee Members

The appointment and dismissal process of the Bank's ALCO refers to the Decree of the Bank's Board of Directors on the Determination of ALCO Members and is guided by the Internal Memorandum on the Improvement of ALCO Structure of Bank Sahabat Sampoerna.

Komite Pengarah Teknologi Informasi

Komite Pengarah Teknologi Informasi merupakan organ pendukung yang dibentuk oleh Bank sebagaimana diwajibkan dalam Peraturan Bank Indonesia tentang Penerapan Manajemen Risiko dalam penggunaan teknologi informasi oleh Bank Umum.

Piagam Komite

Komite Pengarah Teknologi Informasi menjalankan tugas dan tanggung jawabnya dengan berpedoman pada Surat Keputusan Direksi PT Bank Sahabat Sampoerna.

Tugas, Tanggung Jawab, dan Wewenang Komite

Komite Pengarah Teknologi Informasi memiliki tugas utama untuk memberikan masukan atau rekomendasi kepada Direksi terkait:

1. Rencana Strategis Teknologi Informasi yang sejalan dengan rencana strategis kegiatan usaha Bank;
2. Perumusan kebijakan, standar, dan prosedur teknologi informasi yang utama;
3. Kesesuaian antara pelaksanaan proyek teknologi informasi yang disetujui dengan Rencana Strategis Teknologi Informasi;
4. Kesesuaian antara pelaksanaan proyek teknologi informasi dengan rencana proyek yang disepakati (project charter);
5. Kesesuaian antara teknologi informasi dengan kebutuhan sistem informasi manajemen serta kebutuhan kegiatan usaha Bank;
6. Efektivitas langkah-langkah dalam meminimalkan risiko atas investasi Bank pada sektor teknologi informasi, agar investasi Bank pada sektor teknologi informasi memberikan kontribusi terhadap pencapaian tujuan bisnis Bank;
7. Pemantauan atas kinerja teknologi informasi dan upaya peningkatan kinerja teknologi informasi;
8. Upaya penyelesaian berbagai masalah terkait teknologi informasi yang tidak dapat diselesaikan oleh Satuan Kerja Pengguna dan Penyelenggara Teknologi Informasi secara efektif, efisien, dan tepat waktu; serta
9. Kecukupan dan alokasi sumber daya yang dimiliki Bank.

Kedudukan Komite

Secara struktural, kedudukan Komite Pengarah Teknologi Informasi berada di bawah Direktur Teknologi Informasi Bank. Sementara penyampaian laporan pelaksanaan tugas, komite ini disampaikan langsung kepada Direktur Utama Bank.

Komposisi dan Profil Komite

Sesuai dengan Surat Keputusan Direksi PT Bank Sahabat Sampoerna, komposisi keanggotaan Komite Pengarah Teknologi Informasi adalah sebagai berikut:

Information Technology Steering Committee

The Information Technology Steering Committee is a supporting organ formed by the Bank as required by the Bank Indonesia Regulation on the Implementation of Risk Management in the use of information technology by Commercial Banks.

Committee Charter

The Information Technology Steering Committee carries out its duties and responsibilities based on the Decree of the Board of Directors of PT Bank Sahabat Sampoerna.

Duties, Responsibilities, and Authority of the Committee

The main tasks of the Information Technology Steering Committee include providing input or recommendations to the Board of Directors regarding:

1. *The Information Technology Strategic Plan aligned with the Bank's business strategic plan;*
2. *Formulation of key information technology policies, standards, and procedures;*
3. *Alignment between the implementation of approved information technology projects and the Information Technology Strategic Plan;*
4. *Alignment between the implementation of information technology projects and the agreed project plan (project charter);*
5. *Alignment between information technology and the needs of management information systems and the Bank's business activities;*
6. *Effectiveness of measures to minimize risks associated with the Bank's investments in information technology sector, ensuring that investments in the information technology sector contribute to achieving the Bank's business objectives;*
7. *Monitoring the performance of information technology and efforts to improve information technology performance;*
8. *Efforts to resolve various information technology-related issues that cannot be resolved by the User Work Unit and Information Technology Service Provider effectively, efficiently, and timely; and*
9. *Sufficiency and allocation of the Bank's resources.*

Position of Information Technology Steering Committee

Structurally, the Information Technology Steering Committee reports to Information Technology Director of the Bank. However, the committee's task implementation reports are directly submitted to the President Director of the Bank.

Membership Composition and Profile of the Committee

The membership of the Information Technology Steering Committee has been established in the Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna, as follows:

Ketua (Merangkap Anggota Tetap) <i>Chairman (Concurrently a Permanent Member)</i>	Direktur Teknologi Informasi <i>Information Technology Director</i>
Sekretaris (Merangkap Anggota) <i>Secretary (Concurrently a Member)</i>	IT Strategic Planning, Governance & Risk Management <i>IT Strategic Planning, Governance & Risk Management</i>
Anggota Tetap <i>Permanent Members</i>	<ul style="list-style-type: none"> • Direktur Utama <i>President Director</i> • Chief Operations Officer • Finance & Business Planning Director • Chief Credit Officer • Chief SME & High End Business • Compliance & Risk Director • Chief Digital Business • Chief Human Capital Officer • Direktur Bisnis UMKM <i>ESME Business Director</i> • Chief Internal Auditor

Profil anggota Komite Pengarah Teknologi Informasi telah diungkapkan pada Profil Pejabat Eksekutif dalam Bab Profil Perusahaan pada Laporan Tahunan ini.

The profiles of the Information Technology Steering Committee members have been disclosed in the Management and Executive Officer Profiles section of the Company Profile in this Annual Report.

Independensi

Anggota Komite Pengarah Teknologi Informasi berkomitmen untuk mengutamakan sikap independensi, berlaku objektif, dan penuh kehati-hatian dalam pelaksanaan tugas dan tanggung jawabnya. Selain itu, komite ini senantiasa memastikan tidak memiliki benturan kepentingan dengan organ Bank lainnya dan tidak menerima intervensi dari para Pemegang Saham. Komitmen tersebut tercermin dalam pemenuhan aspek independensi sebagai berikut.

Independency

The members of the Information Technology Steering Committee are committed to prioritizing independence, objectivity, and prudence in carrying out their duties and responsibilities. Additionally, the committee ensures that it does not have conflicts of interest with other organs of the Bank and does not receive intervention from Shareholders. This commitment is reflected in the fulfillment of the following independence aspects.

Aspek Independensi <i>Independence Aspect</i>	Ketua (Merangkap Anggota Tetap) <i>Chairman (Concurrently a Permanent Member)</i>	Sekretaris (Merangkap Anggota) <i>Secretary (Concurrently a Member)</i>	Anggota Tetap <i>Permanent Members</i>
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. <i>Does not have financial relationship with the Board of Commissioners and Board of Directors.</i>	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. <i>Does not have management relationship with Shareholders, Subsidiaries, and affiliated companies.</i>	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. <i>Does not have share ownership relationship in the Bank.</i>	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Pengarah Teknologi Informasi. <i>Does not have family relationship with the Board of Commissioners, Board of Directors, and/or among members of Information Technology Steering Committee.</i>	v	v	v

v : Terpenuhi Fulfilled

x : Tidak terpenuhi Unfulfilled

Pelaksanaan Tugas Komite di Tahun 2024

Sepanjang tahun 2024, Komite Pengarah Teknologi Informasi melaksanakan tugas dan tanggung jawabnya melalui sejumlah program, antara lain:

Implementation of Duties of the Committee in 2024

Throughout 2024, the Information Technology Steering Committee has diligently fulfilled its duties and responsibilities, as detailed below.

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
IT Steering Committee	<ul style="list-style-type: none"> • Q1 2024 • Q2 2024 • Q3 2024 • Q4 2024
Rencana Pengembangan TI 2024 revisi Juni <i>IT Development Plan 2024 revised June</i>	Juni 2024 <i>June 2024</i>
Rencana Pengembangan TI 2025 <i>IT Development Plan 2025</i>	November 2024 <i>November 2024</i>

Pelaksanaan Rapat Komite

Komite Pengarah Teknologi Informasi melaksanakan rapat internal paling kurang 4 (empat) kali dalam 1 tahun (triwulanan) atau dapat dilaksanakan sewaktu-waktu sesuai dengan kebutuhan Bank. Sepanjang tahun 2024, Komite Pengarah Teknologi Informasi telah melaksanakan rapat sebanyak 4 (empat) kali. Adapun rincian pelaksanaan dan agenda rapat Komite Kebijakan Perkreditan di tahun 2024 dapat dilihat sebagai berikut:

Meeting Implementations by the Committee

The Information Technology Steering Committee held internal meetings at least 4 (four) times a year (quarterly), or meetings could be held as needed by the Bank. In 2024, the committee held 4 (four) times meetings. The details of the implementation and agenda of the Credit Policy Committee meeting in 2024 can be seen as follows:

Tanggal <i>Date</i>	Agenda <i>Agenda</i>
16 Februari <i>February 16</i>	<ul style="list-style-type: none"> • IT Steering Committee (Komite Pengarah TI) <ul style="list-style-type: none"> > Latar belakang / Background > Struktur Komite Pengarah TI / IT Steering Committee Structure > Struktur Organisasi TI (1 September 2024) / IT Organization Structure (September 1, 2024)
5 Juni <i>June 5</i>	<ul style="list-style-type: none"> • IT Strategic Planning, Governance & Risk Management <ul style="list-style-type: none"> > Summary update of IT Strategic Planning & PMO Specialist > Summary update of IT Finance > Summary update of IT Asset Management > Summary update of IT Governance, Risk & Assurance
21 Agustus <i>August 21</i>	<ul style="list-style-type: none"> • IT Service Delivery <ul style="list-style-type: none"> > System Application Availability Performance > Summary update of IT Service Delivery > Directly Handling of Delivery Channel Partner > 2024 DR Drill Strategy and Progress > Transaction Volume (Digital Service and Switching Channel) > Funding and Lending Volume (T24) > Digital Lending Volume (ARO)
13 November <i>November 13</i>	<ul style="list-style-type: none"> • IT Infrastructure & Security <ul style="list-style-type: none"> > IT Infrastructure & Security Timeline Status > Milestones Cyber Security BSS • IT Business Enablement <ul style="list-style-type: none"> > Update of Key Projects 2024

Rekomendasi

Berdasarkan pelaksanaan tugas sepanjang tahun 2024, Komite Pengarah Teknologi Informasi telah menyampaikan sejumlah rekomendasi terkait pengelolaan teknologi informasi, seperti:

1. Security Operation Center - SOC 24/7.
2. Annual Pentest.
3. Program Security Awareness kepada seluruh karyawan maupun pihak Penyedia Jasa TI.
4. Peningkatan Anti Malware ke Endpoint Detection and Response - EDR.
5. Peningkatan kemampuan pengelolaan aset (Asset Management).

Recommendation

Based on the implementation of tasks throughout 2024, the Information Technology Steering Committee has submitted a number of recommendations regarding information technology management, such as:

1. Security Operation Center - SOC 24/7.
2. Annual Pentest.
3. Security Awareness Program to all employees and IT Service Providers.
4. Anti Malware upgrade to Endpoint Detection and Response - EDR.
5. Improved asset management capabilities.

- | | |
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| <ol style="list-style-type: none"> 6. Peningkatan kapabilitas <i>Identity and Access Management</i>. 7. Peningkatan kemampuan Perangkat <i>Network and Security Devices</i>. 8. Penerapan pencegahan kebocoran data (<i>Data Loss Prevention - DLP</i>). 9. Program Peta Jalan Keamanan Siber secara berkelanjutan. 10. Pembentukan tim tanggap insiden siber. 11. Meningkatkan fitur-fitur digital, baik untuk transaksi finansial ataupun non-finansial. 12. Penerapan prosedur dan tata kelola TI terkait pengadaan, perubahan, dan peningkatan sistem. 13. Penerapan prosedur pengelolaan perubahan sistem baik dari sisi aplikasi, perangkat keras, maupun infrastruktur di area produksi. 14. Penerapan prosedur yang berkaitan dengan penyediaan personil yang mendukung operasional TI, standar proses eskalasi, dan standar <i>service level agreement (SLA)</i>. 15. Penerapan prosedur standar dalam menjalankan operasional <i>data center</i> mencakup <i>operation management, system management, network management, media storage keeping</i>, serta memastikan kapasitas dan kemampuan DRC. | <ol style="list-style-type: none"> 6. <i>Identity and Access Management capability enhancement</i>. 7. <i>Increased capability of Network and Security Devices</i>. 8. <i>Implementation of data loss prevention (DLP)</i>. 9. <i>Continuous Cybersecurity Roadmap Program</i>. 10. <i>Establishment of cyber incident response team</i>. 11. <i>Improving digital features, both for financial and non-financial transactions</i>. 12. <i>Implementation of IT procedures and governance related to procurement, changes, and system upgrades</i>. 13. <i>Implementation of system change management procedures both in terms of applications, hardware, and infrastructure in the production area</i>. 14. <i>Implementation of procedures relating to the provision of personnel supporting IT operations, escalation process standards, and service level agreement (SLA) standards</i>. 15. <i>Implementation of standard procedures in running data center operations including operation management, system management, network management, media storage keeping, and ensuring DRC capacity and capability</i>. |
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Pengembangan Kompetensi

Bank Sahabat Sampoerna senantiasa memfasilitasi Komite Pengarah Teknologi Informasi untuk mengikuti kegiatan pengembangan kompetensi untuk memperluas pemahaman mengenai pelaksanaan tugas dan tanggung jawabnya. Sepanjang tahun 2024, Komite Pengarah Teknologi Informasi telah mengikuti sejumlah kegiatan pengembangan kompetensi yang diungkapkan sebagai berikut:

Competency Development

Bank Sahabat Sampoerna always facilitates the Information Technology Steering Committee to participate in competency development activities to broaden understanding regarding the implementation of its duties and responsibilities. Throughout 2024, the Information Technology Steering Committee has participated in a number of competency development activities as stated below:

Topik Pelatihan <i>Topic of Training</i>	Penyelenggara <i>Organizer</i>	Tanggal Pelatihan <i>Training Date</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 <i>Risk Management Certification Provision & Exam Level 7</i>	Garda	5 Februari <i>February 5</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 5 <i>Risk Management Certification Provision & Exam Level 5</i>	Garda	14 Maret <i>March 14</i>
The Innovative Technology Leader Program <i>The Innovative Technology Leader Program</i>	Stanford Business School	30 Juni <i>June 30</i>
Personal Data Protection <i>Personal Data Protection</i>	Bank Sahabat Sampoerna	4 Maret <i>March 4</i>
Training IT GRC (Governance, Risk, Compliance di Lingkungan Kerja Direktorat Teknologi Informasi) <i>IT GRC Training (Governance, Risk, Compliance in the Directorate of Information Technology Work Environment)</i>	Prof Richardus Eko	20 November <i>November 20</i>

Mekanisme Pengangkatan dan Pemberhentian Anggota Komite

Proses pengangkatan dan pemberhentian Ketua Komite Pengarah Teknologi Informasi mengacu pada wewenang dari Direksi dengan masa jabatan tidak melebihi masa jabatan Direksi Bank. Pihak yang ditunjuk sebagai ketua komite ini harus merupakan seorang Direktur Bank yang

Mechanism of Appointment and Dismissal of Members of the Information Technology Steering Committee

The appointment and dismissal process of the Information Technology Steering Committee's Chairman is based on the Board of Directors' authority, with a term of office no longer than the Bank's Board of Directors. The elected chairman must be the Bank's Director in charge of technology and

membidangi teknologi dan informasi. Selain itu, prosedur pemberhentian Ketua Komite Pengarah Teknologi Informasi dilakukan saat masa jabatan telah selesai atau dapat diberhentikan sewaktu-waktu sesuai dengan keputusan RUPS atau Surat Keputusan Direksi PT Bank Sahabat Sampoerna.

Komite Manajemen Risiko Operasional

Komite Manajemen Risiko Operasional (KMRO) merupakan satu kesatuan dari Komite Manajemen Risiko Bank, yang berada di bawah koordinasi Direksi. KMRO menjalankan tugas dan tanggung jawabnya yang berfokus pada pengelolaan manajemen risiko operasional dan jenis risiko lainnya, seperti risiko hukum, strategis, reputasi, serta kepatuhan. Di samping itu, pembentukan KMRO bertujuan untuk memastikan efektivitas pelaksanaan manajemen risiko operasional dan lainnya secara menyeluruh, mendukung strategi Bank sesuai dengan kebijakan dan prosedur risiko operasional, serta memastikan strategi tersebut sudah dilaksanakan dengan efektif oleh Divisi Bisnis serta fungsi-fungsi pendukung, sejalan dengan strategi dan bisnisnya masing-masing.

Piagam Komite

KMRO menjalankan tugas dan tanggung jawab berpedoman pada Kebijakan Umum Manajemen Risiko, khususnya pada bab mengenai Penerapan Manajemen Risiko Operasional dan tercantum dalam Kebijakan Khusus Manajemen Risiko Operasional Bank Sahabat Sampoerna.

Tugas, Tanggung Jawab, dan Wewenang Komite

Dalam membantu Direksi melakukan fungsi pengelolaan Bank, KMRO memiliki tugas dan tanggung jawab utama, yaitu:

1. Melakukan evaluasi terhadap implementasi kebijakan manajemen risiko serta memberi rekomendasi kepada manajemen terkait kebijakan ataupun tindak lanjut yang harus diambil.
2. Menjadi fasilitator forum untuk melaksanakan identifikasi, penilaian, mitigasi, dan pemantauan yang berkelanjutan terhadap profil risiko dan isu operasional lainnya.

Selain itu, KMRO juga berkewajiban untuk memberi saran kepada Komite Manajemen Risiko dengan cara:

1. Melaporkan hasil *key control self-assessment* (KCSA) yang dilakukan oleh setiap divisi, terutama kantor cabang;
2. Melaporkan kemajuan/perkembangan cabang atas komitmen temuan KCSA; serta
3. Membahas *loss event* dan *lesson learned* untuk meningkatkan pengelolaan risiko operasional.

Kedudukan Komite

Secara struktural, KMRO berada di bawah Direktur Kepatuhan & Manajemen Risiko serta berkoordinasi dengan Kepala *Enterprise Risk, Analytics & Control*. Sementara

information. In addition, the procedure to dismiss the Information Technology Steering Committee's Chairman is carried out when the term of office ends or at any time following the GMS resolution or the Board of Directors' Decision Letter of PT Bank Sahabat Sampoerna

Operational Risk Management Committee

The Operational Risk Management Committee (ORMC) is a unit of the Bank's Risk Management Committee, which is under the coordination of the Board of Directors. ORMC carries out its duties and responsibilities which focus on the management of operational risk management and other types of risks, such as legal, strategic, reputational, and compliance risks. In addition, the establishment of ORMC aims to ensure the effectiveness of the implementation of operational and other risk management as a whole, support the Bank's strategy in accordance with operational risk policies and procedures, and ensure that the strategy has been implemented effectively by the Business Division and supporting functions, in line with their respective strategies and businesses.

Charter of the Committee

ORMC carries out its duties and responsibilities based on the General Risk Management Policy, especially in the chapter on the Implementation of Operational Risk Management and is stated in the Special Policy on Operational Risk Management of Bank Sahabat Sampoerna.

Duties, Responsibilities, and Authority of the Committee

In assisting the Board of Directors in carrying out the Bank's management functions, KMRO has the following main duties and responsibilities:

1. *Evaluating the implementation of risk management policies and providing recommendations to the management on policies or follow-up actions to be taken.*
2. *Becoming a forum facilitator to identify, assess, mitigate, and monitor risk profile and other operational issues on an ongoing basis.*

Also, ORMC is required to provide advice to the Risk Management Committee by:

1. *Reporting the results of key control self-assessment (KCSA) carried out by each division, especially branch offices;*
2. *Reporting the progress/development of branch offices on the commitment of KCSA's findings; and*
3. *Discussing loss events and lessons learned to improve operational risk management.*

Position of the Committee

Structurally, the ORMC is under the Compliance & Risk Director and coordinates with the Enterprise Risk, Analytics & Control Division Head. Whereas for reporting the duties

untuk pelaporan pelaksanaan tugas selama tahun buku, komite ini menyampaikan secara langsung kepada Direktur Utama Bank.

Komposisi dan Profil Komite

Komposisi Komite KMRO telah ditetapkan dalam Kebijakan Khusus Manajemen Risiko Operasional No. BSS/KK-KRO/MRI/03. Komposisi Komite KMRO dapat dilihat sebagai berikut:

Ketua (Merangkap Anggota Tetap) <i>Chairman (Concurrently a Permanent Member)</i>	Kepala Enterprise Risk, Analytics & Control <i>Head of the Enterprise Risk, Analytics & Control Division</i>
Sekretaris (Merangkap Anggota) <i>Secretary (Concurrently a Member)</i>	Operational Risk Department Head
Anggota Tetap <i>Permanent Members</i>	Kepala unit-unit kerja terkait dengan risiko operasional termasuk Kepala Satuan Kerja Kepatuhan, jika diperlukan melibatkan Satuan Kerja Audit Internal sebagai narasumber. <i>Heads of divisions related to operational risk, including the Compliance Division Head, if it is necessary to involve the Internal Audit Division as resource person.</i>

Profil anggota KMRO telah diungkapkan pada Profil Kepala Satuan Kerja Manajemen Risiko dan Pejabat Eksekutif dalam Laporan Tahunan ini.

Independensi

Anggota KMRO berkomitmen untuk mengutamakan sikap independensi, berlaku objektif, dan penuh kehati-hatian dalam pelaksanaan tugas dan tanggung jawabnya. Selain itu, komite ini senantiasa memastikan tidak memiliki benturan kepentingan dengan organ Bank lainnya dan tidak menerima intervensi dari para Pemegang Saham. Komitmen tersebut tercermin dalam pemenuhan aspek independensi sebagai berikut.

Aspek Independensi <i>Independence Aspect</i>	Ketua (Merangkap Anggota Tetap) <i>Chairman (Concurrently a Permanent Member)</i>	Sekretaris (Merangkap Anggota) <i>Secretary (Concurrently a Member)</i>	Anggota Tetap <i>Permanent Members</i>
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. <i>Does not have financial relationship with the Board of Commissioners and Board of Directors.</i>	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. <i>Does not have management relationship with Shareholders, Subsidiaries, and affiliated companies.</i>	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. <i>Does not have share ownership relationship in the Bank.</i>	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Manajemen Risiko Operasional. <i>Does not have family relationship with the Board of Commissioners, Board of Directors, and/or among members of Operational Risk Management Committee.</i>	v	v	v

v : Terpenuhi Fulfilled

x : Tidak terpenuhi Unfulfilled

and responsibilities performed during the fiscal year, this committee is submitting it directly to the President Director of the Bank.

Composition and Profile of the Committee

The ORMC membership has been disclosed in the Special Policy for Operational Risk Management No. BSS/KK-KRO/MRI/03, as follows.

Profile of ORMC members have been disclosed in the Profile of the Enterprise Risk, Analytics & Control Division Head and Executive Officers in this Annual Report.

Independency

ORMC members are committed to prioritize independency, objectivity, and prudence in implementing their duties and responsibilities. In addition, this committee always ensure there is no conflicts of interest with other organs of the Bank and receive no intervention from the Shareholders. The commitment is reflected in the fulfillment of the independency aspect as follows.

Pelaksanaan Tugas Komite di Tahun 2024

Sepanjang tahun 2024, KMRO melaksanakan tugas dan tanggung jawabnya melalui sejumlah program, antara lain:

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
<p>Mengevaluasi terhadap implementasi kebijakan manajemen risiko serta memberi masukan kepada Manajemen terkait kebijakan, langkah, maupun tindak lanjut yang harus ditempuh terutama terkait dengan isu operasional</p> <p><i>Evaluate the implementation of risk management policies and provide input to Management regarding policies, steps, and follow-up that must be taken, especially related to operational issues.</i></p>	<ul style="list-style-type: none"> • Mendiskusikan dan mengevaluasi atas hasil <i>Key Control Self-Assessment</i> (KCSA) yang disusun oleh unit kerja terkait • Mendiskusikan dan mengevaluasi kejadian terkait dengan isu operasional yang tercatat dalam <i>Loss Event Database</i> (LED) • Mendiskusikan dan mengevaluasi pelaksanaan <i>Business Continuity Management</i> (BCM) • Mendiskusikan dan mengevaluasi pelaksanaan <i>Pelindungan Data Pribadi</i> (PDP) • <i>Discuss and evaluate the results of the Key Control Self-Assessment (KCSA) prepared by the relevant work units.</i> • <i>Discuss and evaluate events related to operational issues recorded in the Loss Event Database (LED)</i> • <i>Discuss and evaluate the implementation of Business Continuity Management (BCM)</i> • <i>Discuss and evaluate the implementation of Personal Data Protection (PDP)</i>

Implementation of Duties of the Committee in 2024

Throughout 2024, the ORMC has conducted the following duties and responsibilities as follows:

Pelaksanaan Rapat Komite

Sepanjang tahun 2024, KMRO telah menyelenggarakan rapat sebanyak 3 (tiga) kali dengan rincian sebagai berikut:

Committee Meetings Implementation

Throughout 2024, KMRO has held meetings as many as 3 (three) times with the following details:

Tanggal <i>Date</i>	Agenda <i>Agenda</i>
20 Mei <i>May 20</i> (Quarter 1 2024)	<ul style="list-style-type: none"> • <i>Fraud Management System</i> (FMS) • <i>Pelindungan Data Pribadi</i> (PDP) • <i>Business Continuity Management</i> (BCM) & <i>Business Continuity Plan</i> (BCP) • <i>Disaster Recovery Plan</i> (DRP) & <i>Penetration Testing</i> • <i>Monitoring Implementasi Block Leave</i> Karyawan • <i>Fraud Management System</i> (FMS) • <i>Personal Data Protection</i> (PDP) • <i>Business Continuity Management</i> (BCM) & <i>Business Continuity Plan</i> (BCP) • <i>Disaster Recovery Plan</i> (DRP) & <i>Penetration Testing</i> • <i>Employee Block Leave Implementation Monitoring</i>
21 Agustus <i>August 21</i> (Quarter 2 2024)	<ul style="list-style-type: none"> • <i>Manajemen Insiden Risiko Operasional</i> • <i>Fraud Management System</i> (FMS) • <i>Monitoring Implementasi Block Leave</i> Karyawan • <i>Disaster Recovery Plan</i> (DRP) • <i>Project Pelindungan Data Pribadi</i> (PDP) • <i>Operational Risk Incident Management</i> • <i>Fraud Management System</i> (FMS) • <i>Employee Block Leave Implementation Monitoring</i> • <i>Disaster Recovery Plan</i> (DRP) • <i>Personal Data Protection Project</i> (PDP)
4 Desember <i>December 4</i> (Quarter 3 2024)	<ul style="list-style-type: none"> • <i>Manajemen Insiden Risiko Operasional</i> • <i>Fraud Management System</i> (FMS) • <i>Monitoring Implementasi Block Leave</i> Karyawan • <i>Disaster Recovery Plan</i> (DRP) • <i>Penetapan Sistem/Aplikasi Kritis</i> melalui <i>Business Impact Analysis</i> (BIA) • <i>Project Pelindungan Data Pribadi</i> (PDP) • <i>Operational Risk Incident Management</i> • <i>Fraud Management System</i> (FMS) • <i>Employee Block Leave Implementation Monitoring</i> • <i>Disaster Recovery Plan</i> (DRP) • <i>Determination of Critical Systems/Applications through Business Impact Analysis</i> (BIA) • <i>Personal Data Protection Project</i> (PDP)

Rekomendasi

Berdasarkan pelaksanaan tugas sepanjang tahun 2024, KMRO telah menyampaikan sejumlah rekomendasi terkait risiko operasional Bank, sebagaimana tercatat dalam Notulen Rapat Komite Manajemen Risiko Operasional tahun 2024.

Recommendations

Based on the implementation of its duties throughout 2024, KMRO has delivered a number of recommendations related to the Bank's operational risks, as recorded in the 2024 Operational Risk Management Committee Meeting Minutes.

Pengembangan Kompetensi

Bank Sahabat Sampoerna senantiasa memfasilitasi KMRO untuk mengikuti kegiatan pengembangan kompetensi untuk memperluas pemahaman mengenai pelaksanaan tugas dan tanggung jawabnya. Sepanjang tahun 2024, KMRO telah mengikuti sejumlah kegiatan pengembangan kompetensi yang diungkapkan sebagai berikut:

Topik Pelatihan <i>Training Topic</i>	Penyelenggara <i>Organizer</i>	Tanggal Pelatihan <i>Training Date</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 5 <i>Risk Management Certification Provision & Exam Level 5</i>	Garda	12 Juni <i>June 12</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 4 <i>Risk Management Certification Provision & Exam Level 4</i>	Garda	27 Agustus <i>August 27</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 <i>Risk Management Certification Provision & Test Level 7</i>	Garda	5 Februari <i>February 5</i>
Training Rencana Aksi Keuangan Berkelanjutan (RAKB) <i>Sustainable Finance Action Plan (RAKB) Training</i>	LPPI	11 Juli <i>July 11</i>
Training Simulasi Implementasi Bank Devisa <i>Foreign Exchange Bank Implementation Simulation Training</i>	BNI Corpu	14 Mei <i>May 14</i>

Mekanisme Pengangkatan dan Pemberhentian Anggota Komite

Proses pengangkatan dan pemberhentian Ketua KMRO mengacu pada wewenang Direksi Bank. Pihak yang ditunjuk sebagai ketua komite ini harus merupakan pimpinan yang menjadi bagian dari Direktorat Kepatuhan dan Manajemen Risiko yang bertanggung jawab dalam mengelola Manajemen Risiko Bank.

Komite Produk

Komite Produk adalah organ pendukung Direksi yang dibentuk untuk membantu Direksi dalam mengelola dan mengembangkan produk Bank, baik yang sudah ada maupun produk baru.

Piagam Komite

Komite Produk menjalankan tugas dan tanggung jawab dengan berpedoman pada Peraturan Otoritas Jasa Keuangan No. 13/POJK.03/2021 tentang Penyelenggaraan Produk Bank Umum.

Tugas, Tanggung Jawab, dan Wewenang Komite

Komite Produk memiliki tugas dan tanggung jawab untuk melakukan pengembangan produk maupun aktivitas yang sebelumnya belum pernah dilakukan oleh Bank yang berkoordinasi dengan unit kerja terkait, yaitu Tim *Business Product Development* (BPD), Tim Finance Accounting & Tax, Tim Information Technology Business Enablement, Tim Centralized Operation & Serviced, Tim Enterprise Risk, Analytics & i, Tim Compliance, Tim Corporate Legal & Litigation, serta Board of Management (BOM).

Competence Development

Bank Sahabat Sampoerna always facilitates KMRO to participate in competency development activities to broaden understanding regarding the implementation of its duties and responsibilities. Throughout 2024, KMRO has participated in a number of competency development activities as stated below:

Mechanism of Appointment and Dismissal of Committee Members

The appointment and dismissal process of the ORMC Chairman is based on the Board of Directors' authority. The elected committee's chairman is a leader who is part of the Bank's Compliance and Risk Management Directorate, who is responsible for managing the Bank's Risk Management.

Product Committee

The product committee is a committee appointed to assist the Board of Directors in managing and developing products, both existing and new products.

Charter of the Committee

The Product Committee carries out its duties and responsibilities by referring to the Financial Services Authority Regulation No. 13/POJK.03/2021 on Administration of Commercial Bank Products.

Duties, Responsibilities, and Authority of the Committee

The Product Committee has the duty and responsibility to develop products and activities that have not previously been carried out by the Bank in coordination with related work units, namely the Business Product Development (BPD) Team, Finance Accounting & Tax Team, Information Technology Business Enablement Team, Centralized Operation & Serviced Team, Enterprise Risk, Analytics & i Team, Compliance Team, Corporate Legal & Litigation Team, and Board of Management (BOM).

Kedudukan Komite Produk

Komite Produk merupakan organ pendukung di bawah Direktur Utama yang bertanggung jawab, berkoordinasi, serta menyampaikan Laporan Pelaksanaan Tugas secara langsung kepada Direksi Bank.

Komposisi dan Profil Komite

Sebagaimana tercantum dalam Memorandum No. 09/56/MI/BPD/BSS/III/23, keanggotaan Komite Produk adalah sebagai berikut:

Position of Product Committee

The Product Committee is under the authority of the Board of Directors, and is directly responsible for the implementation of its duties and responsibilities to the President Director of the Bank.

Composition and Profile of the Committee

The Product Committee' membership has been disclosed in Memorandum No. 09/56/MI/BPD/BSS/III/23, as follows.

Ketua (Merangkap Anggota Tetap) <i>Chairman (Concurrently a Permanent Member)</i>	Direktur Kepatuhan & Manajemen Risiko <i>Compliance & Risk Director</i>
Anggota Tetap <i>Permanent Members</i>	<ul style="list-style-type: none"> • Direktur Keuangan & Perencanaan Bisnis <i>Finance & Business Planning Director</i> • Direktur Bisnis UMKM <i>ESME Business Director</i> • Chief Operations Officer • Direktur Teknologi Informasi <i>Information Technology Director</i> • Chief SME & High End Business • Chief Credit Officer • Funding Product & Bancassurance Business Development Division Head • Lending, Fintech Product & Partnership Division Head • Compliance Division Head • Corporate Legal & Litigation Division Head • Finance & Accounting Division Head • Strategic Centralized Operation & Service Head • Enterprise Risk, Analytics & Control Division Head
Anggota Tetap <i>Permanent Members</i>	<ul style="list-style-type: none"> • Treasury & International Banking Head • Financial Institution Head • Lending Center Division Head • Regional Branch Head • New Business Transformation Division Head • Wholesale Division Head • Sales Management Division Head • Funding Business Division Head • SME & FI Credit Division Head • Network Management Division Head • SME Division Head • FI Division Head • Collection & SAM Division Head • Information Technology (IT) Division Head • Credit Legal & Collateral Management

Profil anggota Komite Produk telah diungkapkan pada Profil Pejabat Eksekutif dalam Laporan Tahunan ini.

The profile of the Product Committee members has been disclosed in the Profile of Management and Executive Officers in this Annual Report.

Independensi

Anggota Komite Produk berkomitmen untuk mengutamakan sikap independensi, berlaku objektif, dan penuh kehati-hatian dalam pelaksanaan tugas dan tanggung jawabnya. Selain itu, komite ini senantiasa memastikan tidak memiliki benturan kepentingan dengan organ Bank lainnya dan tidak menerima intervensi dari para Pemegang Saham. Komitmen tersebut tercermin dalam pemenuhan aspek independensi sebagai berikut.

Independency

Product Committee members are committed to prioritizing independence, being objective, and being careful in performing their duties and responsibilities. In addition, this committee always ensures that it does not have conflicts of interest with other Bank organs and does not accept intervention from Shareholders. This commitment is reflected in the fulfillment of independence aspects as follows.

Aspek Independensi <i>Independency Aspect</i>	Ketua (Merangkap Anggota Tetap) <i>Chairman (Concurrently a Permanent Member)</i>	Sekretaris (Merangkap Anggota) <i>Secretary (Concurrently Permanent Members)</i>	Anggota Tetap <i>Permanent Members</i>
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. <i>Does not have financial relationship with the Board of Commissioners and Board of Directors.</i>	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. <i>Does not have management relationship with Shareholders, Subsidiaries, and affiliated companies.</i>	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. <i>Does not have share ownership relationship in the Bank.</i>	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/ atau sesama anggota Komite Produk. <i>Does not have family relationship with the Board of Commissioners, Board of Directors, and/or among members of Product Committee.</i>	v	v	v

v : Terpenuhi Fulfilled
x : Tidak terpenuhi Unfulfilled

Pelaksanaan Tugas Komite di Tahun 2024

Sepanjang tahun 2024, Komite Produk telah melaksanakan tugas dan tanggung jawabnya melalui sejumlah program, antara lain:

Implementation of Committee Duties in 2024

Throughout 2024, the Product Committee has carried out its duties and responsibilities through a number of programs, including:

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
<i>Funding & Bancassurance</i>	<ol style="list-style-type: none"> 1. Memberi persetujuan atas inisiatif baru untuk produk dan layanan yang terkait dengan <i>Funding</i> <ul style="list-style-type: none"> > Layanan Tarik Tunai Tanpa Kartu > Produk Sampoerna <i>Mobile Time Deposit</i> > Produk Giro Sampoerna Usaha > Layanan <i>Cash Recycling Machine</i> 2. Memberikan persetujuan untuk kerja sama dengan mitra asuransi terkait dengan <i>Bancassurance</i> <ul style="list-style-type: none"> > Produk Asuransi Jiwa Kredit KMG HCID <ol style="list-style-type: none"> 1. <i>Approve new initiatives for products and services related to Funding</i> <ul style="list-style-type: none"> > <i>Cardless Cash Withdrawal Service</i> > <i>Sampoerna Mobile Time Deposit product</i> > <i>Giro Sampoerna Usaha Product</i> > <i>Cash Recycling Machine Service</i> 2. <i>Provide approval for cooperation with insurance partners related to Bancassurance</i> <ul style="list-style-type: none"> > <i>KMG HCID Credit Life Insurance Product</i>

Program Kerja Work Program	Pelaksanaan Implementation
<p>Fintech, Lending, Product & Partnership</p>	<ol style="list-style-type: none"> 1. Memberi persetujuan inisiatif baru dan termasuk pengembangan serta perubahan atas inisiatif eksisting, sebagai berikut : <ul style="list-style-type: none"> > Layanan dan Produk Pembiayaan <ul style="list-style-type: none"> • <i>Digital signature</i> bekerja sama dengan Penyedia Sertifikasi Elektronik (PsrE) • <i>Credit Scoring Service</i> bekerja sama dengan Lembaga Pengelola Informasi Perkreditan PT Pefindo Biro Kredit • <i>Buy Now Pay Later</i> (BNPL) • Sampoerna Business Solution (SBS) > Layanan Digital dan Produk Bank Umum <ul style="list-style-type: none"> • Loker Bank Sampoerna • Penghentian produk TASAku sebagai Produk Laku Pandai BSS 2. Memberikan arahan atas kerja sama BSS dan Mitra strategis terkait dengan produk pembiayaan <ul style="list-style-type: none"> > Pembiayaan <i>Channelling</i> bekerja sama dengan Mitra-Mitra strategis baru diantaranya PT Creative Mobile Adventure (BOOST), PT Sejahtera Sama Kita (SamaKita), Samir, 360Kredi dan Degadai > <i>Direct Lending</i> kepada <i>end users</i> bekerja sama dengan Multifinance PT Home Credit Indonesia, <i>platform dealer</i> mobil OTO dan Mitra strategis lainnya 3. Program Edukasi dan Literasi Keuangan Produk Digital Aplikasi Sampoerna Mobile Banking <ul style="list-style-type: none"> > <i>Event</i> Sampoerna Festival di kota-kota besar di Indonesia diantaranya Surabaya, Pontianak, Semarang dan Palembang > Program <i>marketing</i> untuk meningkatkan akuisisi Nasabah baru, program aktivasi Nasabah untuk menabung dan aktif menggunakan layanan digital BSS serta program <i>loyalty</i> untuk Nasabah. <ol style="list-style-type: none"> 1. <i>Approve new initiatives and include the development and amendment of existing initiatives, as follows:</i> <ul style="list-style-type: none"> > Financing Services and Products <ul style="list-style-type: none"> • <i>Digital signature in collaboration with Electronic Certification Provider (PsrE)</i> • <i>Credit Scoring Service in collaboration with Credit Information Management Institution PT Pefindo Credit Bureau</i> • <i>Buy Now Pay Later (BNPL)</i> • <i>Sampoerna Business Solution (SBS)</i> > Digital Services and Commercial Bank Products <ul style="list-style-type: none"> • <i>Bank Sampoerna Counter</i> • <i>Discontinuation of TASAku product as Laku Pandai BSS Product</i> 2. <i>Provide direction on the cooperation between BSS and strategic partners related to financing products</i> <ul style="list-style-type: none"> > <i>Channelling Financing in collaboration with new strategic Partners including PT Creative Mobile Adventure (BOOST), PT Sejahtera Sama Kita (SamaKita), Samir, 360Kredi and Degadai</i> > <i>Direct Lending to end users in collaboration with PT Home Credit Indonesia Multifinance, OTO car dealer platform and other strategic Partners</i> 3. <i>Financial Education and Literacy Program Digital Products Sampoerna Mobile Banking Application</i> <ul style="list-style-type: none"> > <i>Sampoerna Festival events in major cities in Indonesia including Surabaya, Pontianak, Semarang and Palembang</i> > <i>Marketing programs to increase new customer acquisition, customer activation programs to save and actively use BSS digital services and loyalty programs for customers.</i>

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
<p><i>Digital Initiative, Fintech, & Partnership</i></p>	<ol style="list-style-type: none"> 1. Memberi persetujuan atas inisiatif baru untuk produk dan layanan yang terkait dengan Digital/<i>electronic channel</i> dan terkait sistem pembayaran: <ul style="list-style-type: none"> > QRIS <i>Customer Presented Mode</i>, penambahan fitur setelah QRIS <i>Merchant Presented Mode</i> > API QRIS <i>Merchant Aggregator</i> yang berbasis standard SNAP > Pengembangan API <i>Consumer Open Banking</i> yang termasuk API registrasi dan penautan akun pada platform lain > Layanan E-KYC <i>funding</i> versi <i>inhouse</i> dan penambahan teknologi <i>Biometrics liveness</i> dan <i>face recognition</i> yang bekerja sama dengan VIDA > Pengembangan layanan E-KYC <i>lending</i> yang terhubung pada layanan BNPL > Pengembangan <i>webview</i> GPN dan Visa <i>card management</i>, <i>pin creation</i>, halaman transfer dana yang dapat dihubungkan pada <i>platform</i> Mitra > Pengembangan <i>sandbox</i> portal API untuk para developer calon Mitra > Penambahan <i>Third Party Processor</i> yang menyediakan sistem layanan CMS Visa untuk BSS > Penyesuaian spesifikasi API eksisting sesuai rekomendasi ASPI > Penambahan parameter FMS dan menghubungkan <i>Sampoerna Mobile Merchant</i> ke <i>Consent Management System & Operational Data Center</i> 2. Memberikan arahan atas kerja sama BSS dan Mitra strategis terkait dengan produk transaksi keuangan digital/<i>cash management</i>: <ul style="list-style-type: none"> > Kerja sama Virtual Account & Fund Transfer Host-to-Host berbasis API SNAP: Moneta Pembayaran Teknologi (MonetaPay), Nusa Satu Inti Artha (Doku), Kirim Uang Indonesia, Sahabat Kirim Digital (Easylink), Solusi Oke Logistik (KargoOke), Sejahtera Sama Kita (SSK), Priority Valasindo Remittance (PriorityPay), Samir > Kerja sama QRIS Merchant Aggregator berbasis API SNAP: Solusi Pembayaran Nasional (SPN Pay), Dompot Harapan Bangsa (OY!), Silot Technology Indonesia (Silot) > Kerja sama Consumer API Open Banking: Nex Teknologi Digital (Nex) <ol style="list-style-type: none"> 1. <i>Approved new initiatives for products and services related to Digital/electronic channels and payment system:</i> <ul style="list-style-type: none"> > QRIS <i>Customer Presented Mode</i>, <i>additional features after QRIS Merchant Presented Mode</i> > QRIS <i>Merchant Aggregator API based on SNAP standard</i> > <i>Development of Consumer Open Banking API which includes API registration and account linking on other platforms</i> > <i>In-house version of E-KYC funding service and addition of Biometrics liveness and face recognition technology in collaboration with VIDA</i> > <i>Development of E-KYC lending services connected to BNPL services</i> > <i>Development of GPN and Visa card management webviews, pin creation, fund transfer pages that can be connected to Partner platforms</i> > <i>Development of API portal sandbox for prospective Partner developers</i> > <i>Addition of Third Party Processor that provides Visa CMS service system for BSS</i> > <i>Adjustment of existing API specifications according to ASPI recommendations</i> > <i>Adding FMS parameters and connecting Sampoerna Mobile Merchant to Consent Management System & Operational Data Center.</i> 2. <i>Provide direction on the cooperation between BSS and strategic Partners related to digital financial transaction/cash management products:</i> <ul style="list-style-type: none"> > SNAP API-based Host-to-Host Virtual Account & Fund Transfer cooperation: <i>Moneta Payment Technology (MonetaPay), Nusa Satu Inti Artha (Doku), Kirim Uang Indonesia, Sahabat Kirim Digital (Easylink), Solusi Oke Logistik (KargoOke), Sejahtera Sama Kita (SSK), Priority Valasindo Remittance (PriorityPay), Samir</i> > QRIS Merchant Aggregator cooperation based on SNAP API: <i>National Payment Solution (SPN Pay), Dompot Harapan Bangsa (OY!), Silot Technology Indonesia (Silot)</i> > Consumer API Open Banking cooperation: <i>Nex Teknologi Digital (Nex)</i>

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
<i>Digital Business</i>	<ol style="list-style-type: none"> 3. Memberi persetujuan atas inisiatif baru untuk produk dan program yang terkait dengan produk <i>Digital Business</i> <ul style="list-style-type: none"> > Pengembangan layanan eKYC v2 dan penambahan teknologi <i>Biometrics liveness</i> dan <i>face recognition</i> yang bekerja sama dengan VIDA > Pengembangan layanan eKYB > Pengembangan layanan <i>Corporate OB</i> > Pengembangan layanan <i>Consumer OB In-House</i> > Pengembangan layanan <i>Deposit</i> rekening BSS melalui VA bank lain yang mengakomodasi 3 (tiga) <i>use case</i> : <i>Mitra Open Banking</i>, <i>Mitra Executing</i> dan <i>Mitra Channelling</i> 4. Memberikan arahan atas kerja sama BSS dan Mitra terkait dengan produk Digital <ul style="list-style-type: none"> > Kerja sama layanan eKYB & <i>Corporate Open banking</i> : <i>NexBusiness</i> <ol style="list-style-type: none"> 1. <i>Approved new initiatives for products and programs related to Digital Business products.</i> <ul style="list-style-type: none"> > <i>Development of eKYC v2 service and addition of Biometrics liveness and face recognition technology in collaboration with VIDA</i> > <i>Development of eKYB service</i> > <i>Development of Corporate OB service</i> > <i>Development of In-House Consumer OB service</i> > <i>Development of BSS account deposit services through other banks' VA that accommodates 3 (three) use cases: Open Banking Partner, Executing Partner and Channelling Partner.</i> 2. <i>Provide direction on BSS and Partner cooperation related to Digital products</i> <ul style="list-style-type: none"> > <i>eKYB & Corporate Open banking service cooperation: NexBusiness</i>
<i>Treasury</i>	Memberikan arahan dan persetujuan atas inisiatif baru untuk produk Bank Devisa <i>Provide direction and approval on new initiatives for Foreign Exchange Bank products</i>

Pelaksanaan Rapat Komite

Komite Produk dapat menyelenggarakan rapat sekurang-kurangnya 1 (satu) kali setiap bulannya. Sepanjang tahun 2024, Komite Produk telah menyelenggarakan rapat sebanyak 9 (Sembilan) kali dengan rincian sebagai berikut:

Committee Meetings Implementations

The Product Committee may hold a meeting at least 1 (one) time per month. Throughout 2024, the Product Committee has held 9 (nine) meetings with the following details:

Tanggal <i>Date</i>	Agenda <i>Agenda</i>
18 Januari <i>January 18</i>	1. Inisiatif Produk Baru untuk <i>Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership</i> dan <i>Digital Business</i>
15 Februari <i>February 15</i>	2. <i>Project Update</i> terkait dengan proses <i>enhancement</i> teknologi yang relevan untuk pengembangan produk <i>Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership</i> dan <i>Digital Business</i>
24 April <i>April 24</i>	3. Sumber daya dan anggaran untuk pengembangan produk <i>Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership</i> dan <i>Digital Business</i>
16 Mei <i>May 16</i>	4. Umpan balik dari Unit Kerja Terkait untuk pengembangan produk <i>Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership</i> dan <i>Digital Business</i>
2 Juli <i>July 2</i>	5. Tindak lanjut dari pelaksanaan atas keputusan pada rapat di periode sebelumnya terkait dengan pengembangan produk <i>Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership</i> dan <i>Digital Business</i>
31 Juli <i>July 31</i>	6. Rencana tindak lanjut atas aktivitas pengembangan produk <i>Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership</i> dan <i>Digital Business</i>
29 Agustus <i>August 29</i>	1. <i>New Product Initiatives for Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership and Digital Business</i>
17 Oktober <i>October 17</i>	2. <i>Project Update related to the technology enhancement process relevant to the development of Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership and Digital Business products.</i>
20 November <i>November 20</i>	3. <i>Resources and budget for Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership and Digital Business product development</i>
	4. <i>Feedback from Related Work Units for the development of Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership and Digital Business products</i>
	5. <i>Follow-up on the implementation of decisions made at meetings in the previous period related to the development of Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership and Digital Business products.</i>
	6. <i>Follow-up plan on product development activities of Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership and Digital Business</i>

Rekomendasi

Di tahun 2024, Komite Produk telah menyampaikan sejumlah rekomendasi terkait pengembangan produk Bank, antara lain:

Recommendations

In 2024, the Product Committee has submitted a number of recommendations regarding the Bank's product development, including:

Produk Product	Rekomendasi Recommendation
Funding & Bancassurance	<ol style="list-style-type: none"> 1. Layanan Tarik Tunai Tanpa Kartu 2. Produk Sampoerna <i>Mobile Time Deposit</i> 3. Produk Giro Sampoerna Usaha 4. Layanan <i>Cash Recycling Machine</i> 5. Produk Asuransi Jiwa Kredit KMG HCID <ol style="list-style-type: none"> 1. <i>Cardless Cash Withdrawal Service</i> 2. <i>Sampoerna Mobile Time Deposit product</i> 3. <i>Giro Sampoerna Usaha product</i> 4. <i>Cash Recycling Machine Service</i> 5. <i>KMG HCID Credit Life Insurance Product</i>
Fintech, Lending, Product & Partnership	<ol style="list-style-type: none"> 1. <i>Digital signature</i> bekerja sama dengan Penyedia Sertifikasi Elektronik (PsrE) 2. <i>Credit Scoring Service</i> bekerja sama dengan Lembaga Pengelola Informasi Perkreditan PT Pefindo Biro Kredit 3. <i>Buy Now Pay Later (BNPL)</i> 4. Sampoerna Business Solution (SBS) 5. Loker Bank Sampoerna 6. Penghentian produk TASAKU sebagai Produk Laku Pandai BSS 7. Pembiayaan <i>Channelling</i> bekerja sama dengan Mitra-Mitra strategis baru diantaranya PT Creative Mobile Adventure (BOOST), PT Sejahtera Sama Kita (SamaKita), Samir, 360Kredi dan Degadai 8. <i>Direct Lending</i> kepada <i>end users</i> bekerja sama dengan Multifinance PT Home Credit Indonesia, <i>platform dealer</i> mobil OTO dan Mitra strategis lainnya 9. Program Edukasi dan Literasi Keuangan Produk Digital Aplikasi Sampoerna Mobile Banking <ul style="list-style-type: none"> > Pelaksanaan <i>event</i> Sampoerna Festival di kota-kota besar di Indonesia diantaranya Surabaya, Pontianak, Semarang, dan Palembang > Program <i>marketing</i> untuk meningkatkan akuisisi Nasabah baru, program aktivasi Nasabah untuk menabung dan aktif menggunakan layanan digital BSS serta program <i>loyalty</i> untuk Nasabah <ol style="list-style-type: none"> 1. <i>Digital signature in collaboration with Electronic Certification Provider (PsrE)</i> 2. <i>Credit Scoring Service in collaboration with Credit Information Management Institution PT Pefindo Credit Bureau</i> 3. <i>Buy Now Pay Later (BNPL)</i> 4. <i>Sampoerna Business Solution (SBS)</i> 5. <i>Loker Bank Sampoerna</i> 6. <i>Discontinuation of TASAKU product as Laku Pandai BSS Product</i> 7. <i>Financing Channelling in collaboration with new strategic partners including PT Creative Mobile Adventure (BOOST), PT Sejahtera Sama Kita (SamaKita), Samir, 360Kredi and Degadai.</i> 8. <i>Direct Lending to end users in collaboration with PT Home Credit Indonesia Multifinance, OTO car dealer platform and other strategic Partners</i> 9. <i>Education and Financial Literacy Program for Digital Products Sampoerna Mobile Banking Application</i> <ol style="list-style-type: none"> 9. <i>Implementation of Sampoerna Festival events in major cities in Indonesia including Surabaya, Pontianak, Semarang, and Palembang</i> 9. <i>Marketing programs to increase new customer acquisition, customer activation programs to save and actively use BSS digital services and loyalty programs for customers</i>

Produk <i>Product</i>	Rekomendasi <i>Recommendation</i>
<p><i>Digital Initiative, Fintech, & Partnership</i></p>	<p>Memberi persetujuan atas inisiatif baru untuk produk dan layanan yang terkait dengan Digital/<i>electronic channel</i> dan terkait sistem pembayaran:</p> <ol style="list-style-type: none"> 1. QRIS <i>Customer Presented Mode</i>, penambahan fitur setelah QRIS <i>Merchant Presented Mode</i> 2. API QRIS Merchant Aggregator yang berbasis standard SNAP 3. Pengembangan API <i>Consumer Open Banking</i> yang termasuk API registrasi dan penautan akun pada platform lain 4. Layanan E-KYC <i>funding</i> versi <i>inhouse</i> dan penambahan teknologi <i>Biometrics liveness</i> dan <i>face recognition</i> yang bekerja sama dengan VIDA 5. Pengembangan layanan E-KYC <i>lending</i> yang terhubung pada layanan BNPL 6. Pengembangan <i>webview</i> GPN dan <i>Visa card management, pin creation</i>, halaman transfer dana yang dapat dihubungkan pada platform Mitra 7. Pengembangan sandbox portal API untuk para developer calon Mitra 8. Penambahan <i>Third Party Processor</i> yang menyediakan sistem layanan CMS Visa untuk BSS 9. Penyesuaian spesifikasi API eksisting sesuai rekomendasi ASPI 10. Penambahan parameter FMS dan menghubungkan <i>Sampoerna Mobile Merchant</i> ke <i>Consent Management System & Operational Data Center</i> 11. Kerja sama <i>Virtual Account & Fund Transfer</i> Host-to-Host berbasis API SNAP: Moneta Pembayaran Teknologi (MonetaPay), Nusa Satu Inti Artha (Doku), Kirim Uang Indonesia, Sahabat Kirim Digital (Easylink), Solusi Oke Logistik (KargoOke), Sejahtera Sama Kita (SSK), Priority Valasindo Remittance (PriorityPay), Samir 12. Kerja sama QRIS Merchant Aggregator berbasis API SNAP: Solusi Pembayaran Nasional (SPN Pay), Dompot Harapan Bangsa (OY!), Silot Technology Indonesia (Silot) 13. Kerja sama <i>Consumer API Open Banking</i>: Nex Teknologi Digital (Nex) <p><i>Approve new initiatives for products and services related to Digital/electronic channels and payment systems:</i></p> <ol style="list-style-type: none"> 1. QRIS <i>Customer Presented Mode</i>, an additional feature after QRIS <i>Merchant Presented Mode</i>. 2. QRIS Merchant Aggregator API based on SNAP standard. 3. Development of Consumer Open Banking API which includes API registration and account linking on other platforms 4. In-house version of E-KYC funding service and addition of Biometrics liveness and face recognition technology in collaboration with VIDA 5. Development of E-KYC lending services that are connected to BNPL services 6. Development of GPN and Visa card management webviews, pin creation, fund transfer pages that can be connected to the Partner platform 7. Development of API portal sandbox for prospective Partner developers 8. Addition of Third Party Processor that provides CMS Visa service system for BSS 9. Adjustment of existing API specifications according to ASPI recommendations 10. Adding FMS parameters and connecting Sampoerna Mobile Merchant to Consent Management System & Operational Data Center 10. 11. Host-to-Host Virtual Account & Fund Transfer cooperation based on SNAP API: Moneta Pembayaran Teknologi (MonetaPay), Nusa Satu Inti Artha (Doku), Kirim Uang Indonesia, Sahabat Kirim Digital (Easylink), Solusi Oke Logistik (KargoOke), Sejahtera Sama Kita (SSK), Priority Valasindo Remittance (PriorityPay), Samir. 12. QRIS Merchant Aggregator cooperation based on SNAP API: National Payment Solution (SPN Pay), Dompot Harapan Bangsa (OY!), Silot Technology Indonesia (Silot) 13. Consumer API Open Banking cooperation: Nex Digital Technology (Nex)
<p><i>Digital Business</i></p>	<ol style="list-style-type: none"> 1. Layanan eKYC v2 dan penambahan teknologi <i>Biometrics liveness</i> dan <i>face recognition</i> yang bekerja sama dengan VIDA 2. Layanan eKYB 3. Layanan <i>Corporate OB</i> 4. Layanan <i>Consumer OB In-House</i> 5. Layanan <i>Deposit</i> rekening BSS melalui VA bank lain yang mengakomodasi 3 use case : Mitra Open Banking, Mitra Executing dan Mitra Channelling <p><i>1. eKYC v2 service and the addition of Biometrics liveness and face recognition technology in collaboration with VIDA.</i></p> <ol style="list-style-type: none"> 2. eKYB service 3. Corporate OB service 4. Consumer OB In-House Service 5. BSS account deposit service through other banks' VA that accommodates 3 use cases: Open Banking Partner, Executing Partner and Channelling Partner.
<p><i>Treasury</i></p>	<p>Bank Devisa <i>foreign exchange bank</i></p>

Pengembangan Kompetensi

Bank Sahabat Sampoerna senantiasa memfasilitasi Komite Produk untuk mengikuti kegiatan pengembangan kompetensi untuk memperluas pemahaman mengenai pelaksanaan tugas dan tanggung jawabnya. Sepanjang tahun 2024, Komite Produk telah mengikuti sejumlah kegiatan pengembangan kompetensi yang diungkapkan sebagai berikut:

Topik Pelatihan <i>Training Topic</i>	Penyelenggara <i>Organizer</i>	Tanggal Pelatihan <i>Training Date</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 <i>Risk Management Certification Training & Exam Level 7</i>	Garda	18 Januari <i>January 18</i>
Disruptive Innovation Workshop <i>Disruptive Innovation Workshop</i>	Bank Sahabat Sampoerna	11 Januari <i>January 11</i>
Training Analisa Keuangan SME Business 2024 <i>2024 SME Business Financial Analysis Training</i>	Bank Sahabat Sampoerna	1 Maret <i>March 1</i>
Pemaparan materi Introduction Bank Devisa & Basic Forex, Pemaparan materi Product Knowledge Bank Devisa, Pemaparan materi Flow Process & SO <i>Presentation of Introduction to Foreign Exchange Bank & Basic Forex, Presentation of Foreign Exchange Bank Product Knowledge, Presentation of Flow Process & SO</i>	Bank Sahabat Sampoerna	24 April <i>April 24</i>
Training Simulasi Implementasi Bank Devisa <i>Training on Foreign Exchange Bank Implementation Simulation</i>	BNI Corpu	14 Mei <i>May 14</i>
Training Materi Suku Bunga Dasar kredit <i>Training on Basic Credit Interest Rate</i>	KeyPro	23 Oktober <i>October 23</i>

Mekanisme Pengangkatan dan Pemberhentian Anggota Komite

Proses pengangkatan dan pemberhentian Ketua Komite Produk mengacu pada wewenang Direksi Bank. Pihak yang ditunjuk sebagai ketua komite ini harus merupakan pimpinan yang menjadi bagian dari Direktorat Kepatuhan dan Manajemen Risiko.

Komite Kredit

Komite Kredit adalah organ pendukung Direksi berperan dalam memberikan persetujuan kredit, khususnya untuk segmen usaha mikro kecil dan menengah (UMKM) dan usaha kecil dan menengah (UKM). Bank Sahabat Sampoerna telah memiliki aplikasi *Loan Origination System* (LOS) untuk melakukan penilaian risiko kredit.

Piagam Komite

Dalam menjalankan tugas dan tanggung jawabnya, Komite Kredit senantiasa berpedoman pada PPK Bab XIII dan *Framework* Batas Wewenang Memutus Kredit (BWMK) Maret 2021.

Kedudukan Komite

Secara struktural, Komite Kredit merupakan organ pendukung di bawah Direktur Utama yang bertanggung jawab, berkoordinasi, serta menyampaikan Laporan Pelaksanaan Tugas secara langsung kepada Direksi Bank.

Competence Development

Bank Sahabat Sampoerna always facilitates the Product Committee to participate in competency development activities to broaden their understanding of the implementation of their duties and responsibilities. Throughout 2024, the Product Committee has participated in a number of competency development activities as stated below:

Mechanism for Appointment and Dismissal of Committee Members

The process of appointment and dismissal of the Chairperson of the Product Committee refers to the authority of the Bank's Board of Directors. The party appointed as the chairperson of this committee must be a leader who is part of the Compliance and Risk Management Directorate.

Credit Committee

The Credit Committee is a supporting organ for the Board of Directors that is in charge of providing credit approval, especially for the micro, small, and medium enterprise (MSME) and small and medium enterprise (UKM) segments. Bank Sahabat Sampoerna has a Loan Origination System (LOS) application to carry out credit risk assessments.

Charter of the Committee

The Credit Committee carries out its duties and responsibilities based on PPK Chapter XIII and the Credit Decision Authority Limits (BWMK) Framework of March 2021.

Position of the Committee

The Credit Committee is a supporting organ under the President Director that is having responsibility, coordinating, and submitting Duty Implementation Report directly to the Bank's Board of Directors.

Pelaksanaan Rapat Komite

Rapat Komite Kredit diselenggarakan pada saat membahas proposal kredit pada kewenangan level Direksi.

Committee Meeting Implementations

The Credit Committee's meeting is held when discussing credit proposals at the Board of Directors level.

Pengembangan Kompetensi

Bank Sahabat Sampoerna senantiasa memfasilitasi Komite Kredit untuk mengikuti kegiatan pengembangan kompetensi untuk memperluas pemahaman mengenai pelaksanaan tugas dan tanggung jawabnya. Sepanjang tahun 2024, Komite Kredit telah mengikuti sejumlah kegiatan pengembangan kompetensi yang diungkapkan sebagai berikut:

Competence Development

Bank Sahabat Sampoerna always facilitates the Credit Committee to participate in competency development activities to broaden their understanding of the implementation of their duties and responsibilities. Throughout 2024, the Credit Committee has participated in a number of competency development activities as disclosed below:

Topik Pelatihan <i>Training Topics</i>	Penyelenggara <i>Organizer</i>	Tanggal Pelatihan <i>Training Date</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 7 <i>Risk Management Certification Provision & Exam Level 7</i>	Garda	5 Februari <i>February 5</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 5 <i>Risk Management Certification Provision & Exam Level 5</i>	Garda	12 Juni <i>June 12</i>
Training Analisa Keuangan SME Business <i>SME Business Financial Analysis Training</i>	Bank Sahabat Sampoerna	22 Maret <i>March 22</i>
Training Rencana Aksi Keuangan Berkelanjutan <i>Sustainable Financial Action Plan Training</i>	LPPI	11 Juli <i>July 11</i>
Training Advance Credit Analyst SME Business <i>SME Business Advance Credit Analyst Training</i>	Bank Sahabat Sampoerna	12 Juli <i>July 12</i>

Sekretaris Perusahaan

Corporate Secretary

Sekretaris Perusahaan merupakan organ pendukung Direksi yang bertanggung jawab terhadap pembentukan citra positif Bank serta kegiatan penyampaian informasi material Bank secara tepat waktu dan akurat kepada seluruh pemangku kepentingan. Sekretaris Perusahaan juga bertanggung jawab menyediakan dan menyampaikan informasi kepada masyarakat umum maupun untuk kepentingan investor yang berhubungan dengan kinerja Bank secara tepat waktu, akurat, dan transparan sesuai ketentuan dan perundang-undangan yang berlaku bagi Bank. Dalam melaksanakan tugasnya, Sekretaris Perusahaan bertanggung jawab langsung kepada Direktur Utama.

The Corporate Secretary is a supporting organ of the Board of Directors that is responsible for the formation of a positive image of the Bank and the activities of delivering material information of the Bank in a timely and accurate manner to all stakeholders. The Corporate Secretary is also responsible for providing and delivering information to the general public and for the benefit of investors related to the Bank's performance in a timely, accurate and transparent manner in accordance with the provisions and laws applicable to the Bank. In carrying out his duties, the Corporate Secretary is directly responsible to the President Director

Profil Sekretaris Perusahaan

Di November tahun 2024, Bank telah menunjuk Yulfina Yusuf selaku Kepala Grup Kesekretariatan Perusahaan berdasarkan Surat Penugasan No: 001/PJSG-BSS/XI/2024 sebagai pelaksana tugas Sekretaris Perusahaan.

Corporate Secretary

In November 2024, the Bank has appointed Yulfina Yusuf as the Head of Corporate Secretariat Group based on Assignment Letter No: 001/PJSG-BSS/XI/2024 as the acting Corporate Secretary.

Yulfina Yusuf Kepala Grup Kesekretariatan Perusahaan <i>Head of Corporate Secretariat Group</i>	
Kewarganegaraan <i>Citizenship</i>	Indonesia <i>Indonesia</i>
Usia <i>Age</i>	46 tahun <i>46 years old</i>
Domisili <i>Domicile</i>	Jakarta, Indonesia <i>Jakarta, Indonesia</i>
Dasar Hukum Pengangkatan <i>Legal Basis of Appointment</i>	Surat Penugasan No. 001/PJSG-BSS/XI/2024 pada November 2024 <i>Decree No. 001/PJSG-BSS/XI/2024 in November 2024</i>
Riwayat Pendidikan <i>Education</i>	Sarjana Teknik Sipil Universitas Hasanuddin - Makassar <i>Bachelor of Civil Engineering Hasanuddin University - Makassar</i>
Keahlian <i>Expertise</i>	Ekonomi, Manajemen, dan Perbankan <i>Economics, Management, and Banking</i>
Sertifikasi Profesi <i>Professional Certification</i>	Sertifikasi Manajemen Risiko Jenjang 4 <i>Level 4 Risk Management Certification</i>

Riwayat Pekerjaan <i>Work Experience</i>	<ul style="list-style-type: none"> • Beberapa posisi di PT Bank Sahabat Sampoerna: <ul style="list-style-type: none"> › Corporate Secretarial Group Head, PJS (2024 - sekarang) › Credit & Market Risk Group Head (2021 – sekarang) › Credit Risk & Policy Group Head (2019 – 2021) › Credit Policy SME & FI Dept Head (2015 – 2019) • Beberapa posisi di PT Bank Danamon Tbk: <ul style="list-style-type: none"> › Credit Policy & Alignment Analyst TL/MGR › Branch Manager Cabang Bank Danamon Bantaeng Sul - Sel › Performance Monitoring Officer • Several positions at PT Bank Sahabat Sampoerna: <ul style="list-style-type: none"> › Corporate Secretarial Group Head, PJS (2024 - present) › Credit & Market Risk Group Head (2021 - present) › Credit Risk & Policy Group Head (2019 - 2021) › Credit Policy SME & FI Dept Head (2015 - 2019) • Several positions at PT Bank Danamon Tbk: <ul style="list-style-type: none"> › Credit Policy & Alignment Analyst TL/MGR › Branch Manager of Bank Danamon Bantaeng Branch Sul - Sel › Performance Monitoring Officer
Rangkap Jabatan <i>Concurrent Positions</i>	<p>Tidak memiliki rangkap jabatan di perusahaan lain di luar Grup Sampoerna Strategic. <i>Does not hold concurrent positions in other companies outside the Sampoerna Strategic Group.</i></p>
Hubungan Afiliasi <i>Affiliation Relationship</i>	<p>Tidak memiliki hubungan keuangan, kepengurusan, dan kekeluargaan dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali. <i>Does not have financial, management, and family relationships with members of the Board of Commissioners, members of the Board of Directors, and Majority and Controlling Shareholders.</i></p>
Kepemilikan Saham <i>Share Ownership</i>	<p>Tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic. <i>Does not own shares, either in Bank Sahabat Sampoerna or other companies affiliated with the Sampoerna Strategic Group.</i></p>

Tugas, Tanggung Jawab, dan Wewenang Sekretaris Perusahaan

Sekretaris Perusahaan menjalankan tugas dan tanggung jawab sebagai berikut:

1. Mengadakan rapat Dewan Komisaris, Direksi, gabungan, (Dewan Komisaris dan Direksi), Komite Pembantu Dewan Komisaris, serta membuat notulen dari rapat tersebut.
2. Memastikan bahwa setiap pembahasan dalam rapat ditindaklanjuti oleh penanggung jawab terkait.
3. Melakukan pengarsipan dan administrasi terkait notulen rapat tersebut beserta dokumen terkaitnya.
4. Mengatur keluar masuk surat, khususnya terkait dengan regulator.
5. Mengatur surat-surat masuk non-regulator.
6. Melakukan laporan rutin, di antaranya:
 - a. Kepada regulator dan Pemegang Saham terkait Laporan Keuangan in-house; serta
 - b. Laporan Keuangan perusahaan induk.
7. Melakukan publikasi, antara lain publikasi Laporan Keuangan Triwulanan, suku bunga dasar kredit, baik bulanan maupun triwulanan.
8. Mengatur pembuatan Laporan Tahunan Bank serta pelaporannya kepada regulator.

Duties, Responsibility, and Authority of Corporate Secretary

The Corporate Secretary carries out the following duties and responsibilities:

1. Holding meetings of the Board of Commissioners, Board of Directors, joint (Board of Commissioners and Board of Directors), the Board of Commissioners' Assistant Committee, and making minutes of the meeting.
2. Ensuring that every discussion in the meeting is followed up by the relevant person in charge.
3. Filing and administering the minutes of the meeting along with related documents.
4. Managing incoming and outgoing letters, especially those related to regulators.
5. Managing incoming non-regulatory letters.
6. Making routine reports, including:
 - a. To regulators and Shareholders regarding in-house Financial Reports; and
 - b. Financial Reports of the parent company.
7. Carrying out publications, including publication of Quarterly Financial Reports, basic credit interest rates, both monthly and quarterly.
8. Arranging the preparation of the Bank's Annual Report and its reporting to regulators.

9. Memimpin dan mengatur Sekretaris Perusahaan dan memastikan tim tersebut memiliki kemampuan yang baik dalam menjalankan tugasnya.

Pelaksanaan Tugas dan Kegiatan Sekretaris Perusahaan Tahun 2024

Sepanjang tahun 2024, Sekretaris Perusahaan telah menjalankan tugas dan tanggung jawab dengan efektif melalui sejumlah kegiatan, antara lain:

1. Menyelenggarakan rapat Dewan Komisaris, Direksi, gabungan, (Dewan Komisaris dan Direksi), Komite Pembantu Dewan Komisaris, serta membuat notulen dari rapat tersebut.
2. Melakukan publikasi melalui situs web Bank, antara lain publikasi Laporan Tahunan dan Laporan Keberlanjutan, Laporan Keuangan Triwulanan, suku bunga dasar kredit, baik bulanan maupun triwulanan.
3. Mengatur pembuatan Laporan Tahunan dan Laporan Keberlanjutan Bank tahun 2024 serta pelaporan dan penyampaiannya kepada regulator dan Pemegang Saham.

9. *Leading and managing the Corporate Secretary and ensuring that the team has good capabilities in carrying out its duties.*

Implementation of Duties and Activity of Corporate Secretary in 2024

Throughout 2024, the Corporate Secretary has carried out his duties and responsibilities effectively through a number of activities, including:

1. *Organizing meetings of the Board of Commissioners, Board of Directors, joint, (Board of Commissioners and Board of Directors), the Board of Commissioners' Assistant Committee, and making minutes of these meetings.*
2. *Publishing through the Bank's website, including publication of the Annual Report and Sustainability Report, Quarterly Financial Report, basic credit interest rates, both monthly and quarterly.*
3. *Arranging the preparation of the Bank's Annual Report and Sustainability Report for 2024 and reporting and submitting them to regulators and Shareholders.*

Satuan Kerja Audit Internal

Internal Audit Division

Satuan Kerja Audit Internal merupakan organ pendukung Bank yang menjadi pertahanan lapis ketiga (*third line of defense*). Satuan Kerja Audit Internal berperan untuk melakukan pengawasan dan evaluasi terhadap pengendalian internal Bank melalui pemeriksaan menyeluruh dan berkesinambungan pada masing-masing divisi kerja. Selain itu, Satuan Kerja Audit Internal juga melaksanakan kegiatan *assurance* dan *consulting* secara independen dan objektif untuk memberikan nilai tambah dan memaksimalkan kinerja operasional Bank.

Piagam Audit Internal

Satuan Kerja Audit Internal menjalankan tugas dan tanggung jawab dengan berpedoman pada Piagam Internal Audit yang telah diperbarui dan disahkan oleh Dewan Komisaris dan Direksi pada tanggal 21 November 2022. Piagam ini telah disesuaikan dengan Peraturan Otoritas Jasa Keuangan No. 01/POJK.03/2019 tentang Penerapan Fungsi Audit Intern pada Bank Umum dan Penerapan Fungsi Audit Internal pada Bank Umum di Indonesia. Isi Piagam Internal Audit, terdiri dari:

1. Visi dan Misi;
2. Struktur dan Kedudukan dalam Organisasi;
3. Ruang Lingkup;
4. Kewenangan, Tugas Pokok, dan Tanggung Jawab;
5. Independensi, Objektivitas, dan Profesionalisme;
6. Aktivitas Audit Internal dan Investigasi;
7. Hubungan dengan Direksi;
8. Hubungan dengan Dewan Komisaris;
9. Hubungan dengan Komite Audit;
10. Hubungan dengan Unit Kerja Pengendalian dan Auditor Eksternal;
11. Penggunaan Jasa Pihak Eksternal dalam Pelaksanaan Audit Internal;
12. Peran Assurance dan Consultancy;
13. Peran Quality Assurance; dan
14. Lain-Lain.

The Internal Audit Division is the third line of defense, with the role to perform supervision and evaluation on the internal control of the Bank by conducting a thorough and continuous audit of each division. In addition, this division is conducting assurance and consulting in independent and objective manner to provide added values and maximizes the operational performance of the Bank.

Charter of the Internal Audit

The Internal Audit Division performs its duties and responsibilities by referring to the Internal Audit Charter, which was updated and approved by the Board of Commissioners and Board of Directors on November 21, 2022. The charter was adjusted to the Financial Services Authority Regulation No. 01/POJK.03/2019 on the Implementation of Internal Audit Function in Commercial Banks and Implementation of Internal Audit Function in Commercial Banks in Indonesia. The Internal Audit Charter consists of:

1. Vision and Mission;
2. Structure and Position in Organization;
3. Scope;
4. Authority, Main Duties, and Responsibilities;
5. Independence, Objectivity, and Professionalism;
6. Internal Audit and Investigation Activities;
7. Relationship with Board of Directors;
8. Relationship with Board of Commissioners;
9. Relationship with Audit Committee;
10. Relationship with Control Division and External Auditor;
11. Use of External Party Services in Conducting Internal Audit;
12. The Role of Assurance and Consultancy;
13. The Role of Quality Assurance; and
14. Others

Visi dan Misi

Vision and Mission

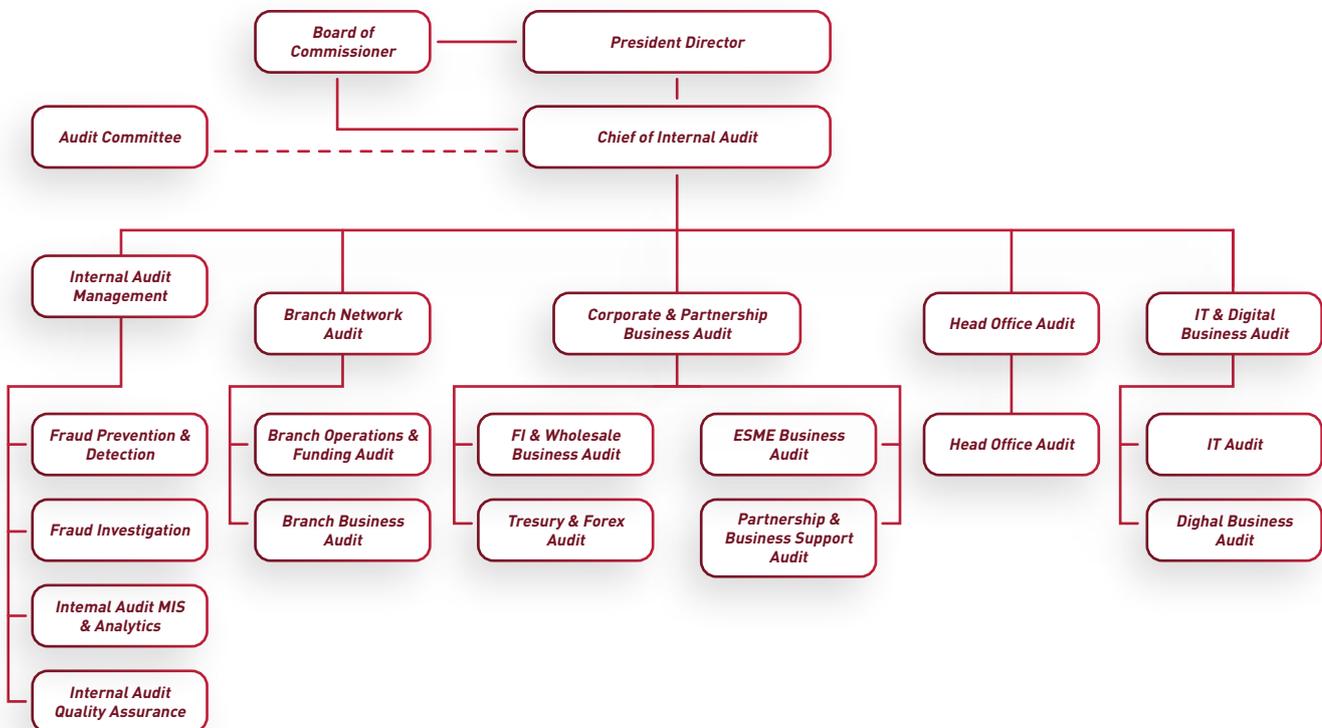
Visi Vision	
Menjadi strategic partner yang kompeten, profesional, dan independen serta terbaik bila dibandingkan sesuai kelasnya.	To be the best, competent, professional, and independent strategic partner according to its class.
Misi Mission	
<p>Membantu mencapai tujuan perusahaan melalui assurance dan consulting yang independen dan objektif, serta memberikan nilai tambah atas kinerja yang dihasilkan, melalui:</p> <ul style="list-style-type: none"> • Mengevaluasi efektivitas dan kecukupan pelaksanaan pengendalian internal, pengelolaan risiko, dan proses tata kelola perusahaan melalui penerapan risk based audit; • Memberikan jasa konsultasi yang independen dan objektif berdasarkan kebutuhan auditee terhadap aktivitas/produk baru sesuai rekomendasi terbaik dari Audit Internal; • Mengelola aktivitas audit internal secara efektif dan efisien; • Mengembangkan kompetensi internal auditor melalui perolehan sertifikasi dan kualifikasi profesi yang sesuai kebutuhan dan perkembangan organisasi, serta mengintensifkan penggunaan teknologi informasi; dan • Meningkatkan sinergi fungsi audit internal dan eksternal audit. 	<p>To help achieve Company goals through independent and objective assurance and consulting, as well as provide added value to the resulting performance, through:</p> <ul style="list-style-type: none"> • Evaluate the effectiveness and adequacy of internal control, risk management, and corporate governance process through risk-based audits; • Provide independent and objective consulting services based on the auditee's needs for new activities/products according to the best recommendations from the Internal Audit; • Manage internal audit activities effectively and efficiently; • Develop internal auditors' competence through obtaining certification and professional qualifications according to the organization's needs and development, and intensify information technology use; and • Improve the synergy of internal and ex-ternal audit functions.

Kedudukan dan Struktur Audit Internal

Position and Structure of Internal Audit

Secara struktural, Satuan Kerja Audit Internal berada langsung di bawah Direktur Utama dan dapat melakukan koordinasi dengan Komite Audit yang berada di bawah Dewan Komisaris sebagaimana dapat dilihat pada bagan berikut:

The Internal Audit Division of Bank Sahabat Sampoerna serves directly under the President Director and coordinates with the Audit Committee under the Board of Commissioners, as shown in the following chart.



Jumlah Auditor

Hingga 31 Desember 2024, Bank Sahabat Sampoerna memiliki auditor internal dalam Satuan Kerja Audit Internal sebanyak 34 orang, termasuk Kepala Satuan Kerja Audit Internal.

Number of Auditor

As of 31 December 2024, there are 33 internal auditors of the Bank's Internal Audit Division, including the Chief of Internal Audit.

Profil Kepada Satuan Kerja Audit Internal

Bank Sahabat Sampoerna telah menunjuk Nancy Suryani sebagai Kepala Satuan Kerja Audit Internal atau *Chief Internal Auditor* berdasarkan Surat Keputusan No. 0823/IM/HC/BSS/VIII/2022 tanggal 5 Agustus 2022.

Profile of Chief of Internal Audit

Banks Sahabat Sampoerna appointed Nancy Suryani as the Chief Internal Auditor based on Decision Letter No. 0823/IM/HC/BSS/VIII/2022 dated 5 August 2022.

Nancy Suryani Chief Internal Auditor	
Kewarganegaraan <i>Citizenship</i>	Indonesia Indonesia
Usia <i>Age</i>	53 tahun 53 years old
Domisili <i>Domicile</i>	Jakarta, Indonesia <i>Jakarta, Indonesia</i>
Dasar Hukum Pengangkatan <i>Legal Basis of Appointment</i>	Surat Keputusan No. 0823/IM/HC/BSS/VIII/2022 <i>Decree No. 0823/IM/HC/BSS/VIII/2022</i>
Riwayat Pendidikan <i>Education</i>	<ul style="list-style-type: none"> Magister jurusan Manajemen Keuangan, STIE IPWI, Jakarta (1998) Sarjana Akuntansi, Universitas Tarumanagara, Jakarta (1994) Master of Financial Management, STIE IPWI, Jakarta (1998) Bachelor of Accounting, Tarumanagara University, Jakarta (1994)
Keahlian <i>Expertise</i>	Perbankan Banking
Sertifikasi Profesi <i>Professional Certification</i>	<ul style="list-style-type: none"> Sertifikasi Manajemen Risiko Jenjang 7 Sertifikasi QIA Tingkat Manajerial Khusus Kepala SPI/CAE Risk Management Certification Level 7 QIA Certification Managerial Level Specifically for Head of SPI/CAE
Riwayat Pekerjaan <i>Work Experience</i>	<ul style="list-style-type: none"> SME & FI Credit Division Head PT Bank Sahabat Sampoerna (2017-2022) Senior Credit Manager PT Bank Danamon Indonesia Tbk Credit Advisor PT Bank Central Asia Tbk SME & FI Credit Division Head PT Bank Sahabat Sampoerna (2017-2022) Senior Credit Manager PT Bank Danamon Indonesia Tbk Credit Advisor PT Bank Central Asia Tbk
Rangkap Jabatan <i>Concurrent Positions</i>	Tidak memiliki rangkap jabatan di perusahaan lain di luar Grup Sampoerna Strategic. <i>Does not hold concurrent positions in other companies outside the Sampoerna Strategic Group.</i>
Hubungan Afiliasi <i>Affiliation Relationship</i>	Tidak memiliki hubungan keuangan, pengurusan, dan kekeluargaan dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali. <i>Does not have financial, management, and family relationships with members of the Board of Commissioners, members of the Board of Directors, and Majority and Controlling Shareholders.</i>
Kepemilikan Saham <i>Share Ownership</i>	Tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic. <i>Does not own shares, either in Bank Sahabat Sampoerna or other companies affiliated with the Sampoerna Strategic Group.</i>

Kualifikasi dan Sertifikasi Profesi Audit Internal Internal

Bank Sahabat Sampoerna telah memastikan seluruh auditor yang menjadi bagian dari Satuan Kerja Audit Internal telah memenuhi kualifikasi sesuai dengan Peraturan Bank Indonesia No. 12/7/PBI/2010 perihal Sertifikasi Manajemen Risiko bagi Pengurus dan Pejabat Bank Umum dan Surat Edaran No. 28/SEOJK.03/2022 tentang Sertifikasi Manajemen Risiko bagi Sumber Daya Manusia Bank Umum.

Audit Professional Qualifications and Certification

Bank Sahabat Sampoerna has ensured that all auditors in the Internal Audit Division have met the qualifications, in accordance with Bank Indonesia Regulation No. 12/7/PBI/2010 on Risk Management Certification for Management and Officials of Commercial Banks and Circular No.28/SEOJK.03/2022 on Risk Management Certification for Commercial Bank Human Resources. The

Bank juga akan melakukan penyetaraan dan penyelarasan atas Sertifikasi Manajemen Risiko yang dimiliki Unit Kerja SKAI sebagai pemenuhan ketentuan Surat Edaran No. 28/SEOJK.03/2022 tentang Sertifikasi Manajemen Risiko bagi Sumber Daya Manusia Bank, yang pelaksanaannya akan menyesuaikan dengan jadwal penyelenggara.

Bank memastikan bahwa seluruh personel Divisi Audit Internal telah memiliki kualifikasi dan kompetensi yang baik di bidang audit, serta telah memperoleh beberapa sertifikasi profesi berskala nasional maupun internasional. Kualifikasi/sertifikasi profesi yang dimiliki oleh personel Audit Internal dapat dilihat sebagai berikut:

Kualifikasi/Sertifikasi <i>Qualification/Certification</i>	Jumlah <i>Total</i>
Sertifikasi Qualified Internal Auditor (QIA) <i>Qualified Internal Auditor (QIA) Certification</i>	1 orang <i>1 person</i>
Badan Sertifikasi Manajemen Risiko (BSMR) Jenjang 4 <i>Risk Management Certification Body (BSMR) Level 4</i>	22 orang <i>22 person</i>
Badan Sertifikasi Manajemen Risiko (BSMR) Jenjang 7 <i>Risk Management Certification Body (BSMR) Level 7</i>	1 orang <i>1 person</i>
Skema Sertifikasi Auditor - Kualifikasi IV KKNi <i>Auditor Certification Scheme - KKNi IV Qualification</i>	14 orang <i>14 person</i>

Dalam menjalankan tugas dan tanggung jawabnya, Satuan Kerja Audit Internal senantiasa bertindak secara profesional dan penuh kehati-hatian, serta mengutamakan sikap independensi. Komitmen tersebut dibuktikan dengan tidak adanya hubungan kekerabatan sampai derajat kedua, baik vertikal ataupun horizontal dengan Pemegang Saham, anggota Dewan Komisaris, anggota Direksi, serta auditor di luar Satuan Kerja Audit Internal.

Kode Etik Auditor

Dalam melaksanakan tugas dan tanggung jawabnya, Satuan Kerja Audit Internal senantiasa berpedoman pada Kode Etik Auditor sebagaimana telah dijelaskan dalam Piagam Internal Audit yang terdiri dari:

Menjaga Integritas <i>Maintain Integrity</i>
<p>Integritas auditor internal akan membangun kepercayaan yang menjadi landasan penilaian sehingga auditor internal harus memiliki sikap:</p> <ul style="list-style-type: none"> • Jujur, tekun, dan tanggung jawab dalam melakukan pekerjaan; • Taat hukum, yang diwujudkan dalam pembuatan pengungkapan sesuai ketentuan perundang-undangan dan profesi; • Sadar untuk tidak boleh terlibat dalam aktivitas ilegal apa pun, atau terlibat dalam tindakan yang memalukan, baik untuk profesi auditor internal ataupun organisasi; serta • Menghormati dan berkontribusi agar tercapainya tujuan perusahaan. <p><i>Internal auditor's integrity will build the trust that becomes the basis of assessment. Therefore, internal auditor must:</i></p> <ul style="list-style-type: none"> • <i>Be honest, diligent, and responsible for doing work;</i> • <i>Obey the law, which is realized in the disclosures made in accordance with provisions of laws and regulations and the profession;</i> • <i>Be aware not to be involved in any illegal activity, or to engage in shameful actions, both for the profession of internal auditors or organizations; and</i> • <i>Respect and contribute to the achievement of company goals.</i>

Bank will also perform an equalization and alignment of the Risk Management certification owned by SKAI Division to meet the provisions of Circular No.28/SEOJK.03/2022 on Risk Management Certification for Commercial Bank Human Resources, which will be carried out according to the organizer's schedule.

The Bank ensures that all personnel in the Internal Audit Division possess strong qualifications and competencies in auditing and have earned various national and international professional certifications. The qualifications/professional certifications held by Internal Audit personnel can be seen as follows:

In carrying out its duties and responsibilities, the Internal Audit Work Unit always acts professionally and with great caution, and prioritizes an attitude of independence. This commitment is proven by the absence of kinship relations up to the second degree, either vertically or horizontally with Shareholders, members of the Board of Commissioners, members of the Board of Directors, and auditors outside the Internal Audit Work Unit.

Code of Conduct of Auditors

In carrying out its duties and responsibilities, the Internal Audit Unit is always guided by the Auditor's Code of Ethics as described in the Internal Audit Charter which consists of:

Menjaga Objektivitas*Maintain Objectivity*

Integritas auditor internal akan membangun kepercayaan yang menjadi landasan penilaian. Oleh karena itu, auditor internal harus memiliki sikap:

- Menghindari aktivitas yang dapat merusak objektivitas audit;
- Menolak pemberian apa pun yang dapat mengganggu kemampuannya untuk berlaku profesional; dan
- Melaporkan semua fakta hasil audit (yang seharusnya dilaporkan).

Internal auditor's integrity will build the trust that becomes the basis of assessment. Therefore, internal auditor must:

- *Avoid activities that can damage audit objectivity;*
- *Refuse any gift that can interfere with the ability to act professionally; and*
- *Reports all facts of audit results (which should be reported).*

Menjaga Kerahasiaan*Maintain Confidentiality*

Auditor tidak akan menyampaikan informasi kepada semua pihak yang tidak berhak, sehingga auditor internal harus memiliki sikap:

- Menjaga kerahasiaan informasi yang diperoleh dalam melaksanakan tugas; dan
- Menghindari penyalahgunaan informasi yang diperolehnya untuk keuntungan pribadi/kelompok atau menggunakan informasi dengan cara yang bertentangan dengan hukum atau yang merugikan tujuan dan etika perusahaan.

The auditor will not convey information to all unauthorized parties. Therefore, the internal auditor must:

- *Maintain the confidentiality of information collected while carrying out the tasks; and*
- *Avoid misuse of information obtained for personal/ group benefit or use the information in a way contrary to the law or that harms the company's interests and ethics.*

Memiliki Kompetensi*Have Competence*

Auditor menerapkan semua pengetahuan, keterampilan, dan pengalamannya dalam melaksanakan audit, sehingga auditor internal harus memiliki sikap:

- Menguasai (mempunyai) pengetahuan, keterampilan, dan pengalaman mengenai teknis audit dan disiplin ilmu lain yang relevan dengan bidang tugasnya untuk melaksanakan kegiatan audit;
- Memiliki pengetahuan tentang peraturan perundang-undangan di bidang pasar modal dan peraturan perundang-undangan terkait lainnya;
- Memiliki kecakapan untuk berinteraksi dan berkomunikasi baik lisan maupun tertulis secara efektif;
- Melaksanakan proses audit sesuai dengan Standar dan Panduan Audit;
- Meningkatkan pengetahuan/kecakapan/keahlian dan kemampuan profesionalisme serta efektivitas dan kualitas audit secara terencana dan berkesinambungan melalui seminar, kursus, atau pendidikan lanjutan lainnya; serta
- Memahami prinsip Tata Kelola (GCG) dan manajemen risiko.

The auditor applies all knowledge, skills, and experience in conducting audit. Therefore, internal auditor must:

- *Master (have) knowledge, skills, and experience on audit technicalities and other disciplines relevant to the field of duty to perform audit;*
- *Have knowledge of laws and regulations in capital market sector and other related laws and regulations;*
- *Have the ability to effectively interact and communicate verbally and in writing;*
- *Carry out the audit process in accordance with the Audit Standards and Guidelines;*
- *Enhance knowledge/skills/expertise and professional abilities as well as the effectiveness and quality of audit in a planned and continuous manner through seminars, courses, or other further education; and*
- *Understand GCG principles and risk management.*

Memelihara Independensi*Maintain Independence*

Untuk menjaga independensi, auditor harus bebas dari campur tangan pihak lainnya, sehingga auditor internal harus:

- Bebas dari pengaruh setiap pekerjaan dalam bidang yang diaudit atau yang pernah menjadi tanggung jawabnya;
- Tidak memihak kepada siapa pun; dan
- Tidak terlibat dalam pertentangan kepentingan dengan klien.

To maintain independence, auditor must be free from interference from other parties. Therefore, internal auditor must:

- *Be free from influence of any work in the area that is audited or that has been a responsibility of the auditor;*
- *Does not side with anyone; and*
- *Is not involved in a conflict of interest with client.*

Tugas dan Tanggung Jawab Audit Internal

Satuan Kerja Audit Internal memiliki sejumlah tugas dan tanggung jawab, antara lain:

1. Membuat rencana audit tahunan serta alokasi anggaran dan melaksanakan aktivitas audit internal dengan penekanan bidang/aktivitas yang mempunyai risiko tinggi serta mengevaluasi prosedur yang ada untuk memperoleh keyakinan bahwa tujuan Bank dapat dicapai secara optimal dan berkesinambungan.
2. Melaksanakan rencana audit tahunan dan alokasi anggaran harus disetujui oleh Direktur Utama dan Dewan Komisaris dengan mempertimbangkan rekomendasi Komite Audit dan penugasan lain yang bersifat *surprise/ad hoc* sesuai permintaan Dewan Komisaris, Direksi,

Duties and Responsibilities of Internal Audit

The Internal Audit Division performs the following duties and responsibilities.

1. *Prepare an annual audit plan and budget allocation, conduct internal audit with an emphasis on high-risk areas/activities, and evaluate existing procedures to gain confidence that the Bank's goals can be achieved optimally and sustainably.*
2. *The annual audit plan and budget allocation must be approved by the President Director and the Board of Commissioners by considering the Audit Committee's recommendations and other surprise/ad hoc assignments at the request of the Board of Commissioners, Board*

dan Komite Audit, berdasarkan urgency (kepentingan) dan indikasi tertentu.

3. Melakukan proses audit sesuai dengan ketentuan internal yang berlaku, *standard professional practices*, serta ketentuan Bank Indonesia dan standar profesional audit intern (standar pelaksanaan audit intern secara profesional).
4. Membuat laporan hasil pemeriksaan atas tugas yang dilaksanakan dan *summary top ten risk* hasil pemeriksaan audit untuk disampaikan kepada pihak-pihak yang berkepentingan termasuk Dewan Komisaris atau Direktur Utama. Selain itu, laporan disampaikan salinannya kepada Dewan Komisaris, Komite Audit, dan Direktur Kepatuhan.
5. Memberikan rekomendasi perbaikan atas hasil audit dan informasi yang objektif tentang kegiatan yang diperiksa, serta membuat dan menyampaikan laporan atas hal tersebut.
6. Melakukan monitoring dan analisa kecukupan tindak lanjut perbaikan hasil audit, baik temuan internal, eksternal, dan *management letter*.
7. Melakukan investigasi atau pemeriksaan khusus apabila terdapat dugaan terjadinya kecurangan, penyimpangan terhadap hukum dan peraturan yang berlaku, melaporkan dan menyampaikan informasi dugaan kecurangan (*fraud*) yang ditemukan selama proses audit dan menindaklanjuti sesuai dengan Kebijakan *Anti-Fraud & Investigation*.
8. Memastikan kebenaran Laporan Keuangan Bank dengan melakukan review terhadap Laporan Publikasi Bank secara kuartalan dan melaporkan kepada Komite Audit.
9. Meningkatkan kompetensi dan profesionalitas staf audit dari aspek pengetahuan, keterampilan, dan pengalaman yang diperlukan.
10. Mengembangkan dan menjalankan program untuk mengevaluasi dan meningkatkan kualitas SKAI.

Di samping itu, Satuan Kerja Audit Internal Bank juga memiliki wewenang untuk:

1. Melakukan aktivitas audit internal terhadap kegiatan seluruh semua unit kerja dalam organisasi serta afiliasinya sesuai governance yang berlaku.
2. Melakukan komunikasi secara langsung dengan Direksi termasuk Dewan Komisaris, Direktur Utama, dan Komite Audit.
3. Melakukan komunikasi atau koordinasi dengan pihak eksternal, termasuk regulator dan Auditor Eksternal, serta pihak-pihak lain yang berkaitan dengan tugas SKAI.
4. Melakukan koordinasi kegiatan dengan Auditor Eksternal.
5. Mengadakan dan/atau menghadiri rapat dengan Direksi, Manajemen, Komite Audit, dan komite-komite lain sesuai undangan.
6. Mengikuti rapat yang bersifat strategis, tanpa memiliki hak suara.

of Directors, and Audit Committee, based on urgency (interest) and certain indications.

3. *Carry out the audit process in accordance with applicable internal regulations, standard professional practices, Bank Indonesia provisions, and internal audit professional standards (standards for carrying out internal audit professionally).*
4. *Prepare the audit report on the task and a summary of the top 10 risks from the audit result to be conveyed to interested parties, including the Board of Commissioners or the President Director. A copy of the report is submitted to the Board of Commissioners, Audit Committee, and Compliance Director.*
5. *Provide recommendations for improvements to audit results and objective information about the audited activities, as well as prepare and submit reports on these matters.*
6. *Monitor and analyze the adequacy of follow-up actions for improvement as per the audit results, for internal and external findings, as well as management letter.*
7. *Carry out investigation or special audit if there is allegation of fraud, deviation from applicable laws and regulations, report and submit information on suspected fraud found during the audit process and follow up on such in accordance with the Anti-Fraud & Investigation Policy.*
8. *Ensure the correctness of the Bank's Financial Statements by reviewing the Bank's Publication Reports on a quarterly basis and report it to the Audit Committee.*
9. *Improve the competence and professionalism of audit staff in terms of the required knowledge, skills, and experience.*
10. *Develop and run programs to evaluate and improve the quality of Internal Audit Division.*

In addition, the Bank's Internal Audit Work Unit also has the authority to:

1. *Conduct internal audit on all divisions' activities within the organization and its affiliates according to the applicable governance.*
2. *Directly communicate with the Board of Directors including the Board of Commissioners, President Director, and Audit Committee.*
3. *Communicate or coordinate with external parties, including regulators and External Auditor, as well as other parties related to Internal Audit Division's duties.*
4. *Coordinate activities with the External Auditor.*
5. *Hold and/or attend meetings with the Board of Directors, Management, Audit Committee, and other committees as invited.*
6. *Participate in strategic meetings, without voting rights.*

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|---|---|
| <p>7. Menyelenggarakan rapat secara berkala dan insidental dengan Dewan Komisaris, Direksi, serta Komite Audit.</p> <p>8. Mengakses seluruh data, informasi, catatan, dokumen-dokumen, dan fisik aset, termasuk sistem manajemen informasi serta risalah pertemuan Manajemen yang relevan tentang Bank dan dianggap perlu terkait dengan tugas dan fungsi SKAI.</p> <p>9. Memilih object, menentukan frekuensi, dan cakupan kegiatan yang diperlukan untuk mencapai tujuan audit.</p> <p>10. Meminta bantuan dari personil unit lain (sesuai bidang pengetahuan yang diperlukan) untuk membantu tugas-tugas audit.</p> <p>11. Melakukan aktivitas investigasi terhadap kasus/masalah pada setiap aspek dan unsur kegiatan yang terindikasi terjadinya pelanggaran ketentuan perusahaan dan fraud.</p> | <p>7. Hold periodic and incidental meetings with the Board of Commissioners, Board of Directors, and Audit Committee.</p> <p>8. Access all data, information, records, documents, and physical assets, including information management systems and minutes of management meetings that are relevant to the Bank and deemed necessary in relation to SKAI's duties and functions.</p> <p>9. Select the object, determine the frequency and scope of activities required to achieve the audit objectives.</p> <p>10. Request assistance from other unit's personnel (according to the required knowledge) to assist with audit duties.</p> <p>11. Carry out investigative activities on cases/problems in every aspect and element of activity where there are indications of violations of company regulations and fraud.</p> |
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Kebijakan dan Frekuensi Rapat

Sepanjang tahun 2024, Satuan Kerja Audit Internal telah menyelenggarakan sejumlah kegiatan maupun menyampaikan presentasi dalam rapat Dewan Komisaris, Direksi, dan Komite Audit, dengan frekuensi kehadiran sebagai berikut:

Uraian <i>Details</i>	Rapat Dewan Komisaris <i>Board of Commissioners Meeting</i>	Rapat Direksi <i>Board of Directors Meeting</i>	Rapat Komite Audit <i>Audit Committee Meeting</i>
Frekuensi Kehadiran <i>Attendance Frequency</i>	11	49	18

Policies and Meeting Frequencies

Throughout 2024, the Internal Audit Work Unit has organized a number of activities and delivered presentations at meetings of the Board of Commissioners, Board of Directors, and Audit Committee, with the following attendance frequencies:

Pelaksanaan Tugas Audit Internal Tahun 2024

Pada tahun 2024, Satuan Kerja Audit Internal menginvestasikan biaya sebesar Rp335 juta untuk melaksanakan pemeriksaan audit internal. Di samping itu, Satuan Kerja Audit Internal juga melaksanakan tugas dan tanggung jawabnya melalui sejumlah program sebagai berikut:

Internal Audit Duties Implementation in 2024

In 2024, the Internal Audit Work Unit invested Rp335 million to carry out internal audit examinations. In addition, the Internal Audit Work Unit also carries out its duties and responsibilities through a number of programs as follows:

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
Menyusun rencana audit tahunan dan alokasi anggaran untuk pelaksanaan fungsi audit internal tahun 2025. <i>Prepare an annual audit plan and budget allocation for the implementation of the internal audit function in 2025.</i>	Satuan Kerja Audit Internal telah menyusun rencana audit tahunan dan alokasi anggaran berdasarkan penilaian risiko secara komprehensif untuk pelaksanaan fungsi audit internal tahun 2024 dan telah disetujui oleh Dewan Komisaris dan Direktur Utama dengan mempertimbangkan rekomendasi Komite Audit. <i>The Internal Audit Work Unit has prepared an annual audit plan and budget allocation based on a comprehensive risk assessment for the implementation of the internal audit function in 2024 and has been approved by the Board of Commissioners and the President Director by considering the recommendations of the Audit Committee.</i>
Melaksanakan rencana audit tahunan 2024 yang telah disetujui oleh Dewan Komisaris dan Direktur Utama dengan mempertimbangkan rekomendasi Komite Audit serta melaksanakan tugas-tugas lain sesuai dengan kepentingan (urgency) maupun permintaan khusus. <i>Implement the 2024 annual audit plan that has been approved by the Board of Commissioners and the President Director by considering the recommendations of the Audit Committee and carrying out other tasks according to urgency or special requests.</i>	Satuan Kerja Audit Internal telah melaksanakan pemeriksaan sebanyak 48 auditable unit dari total 48 plan, yaitu 5 kantor cabang/area (kredit, operasional dan funding), 9 business support, 3 Treasury & Forex, 13 kantor pusat, dan 18 pemeriksaan dibidang informasi teknologi. <i>The Internal Audit Work Unit has conducted audits of 48 auditable units from a total of 48 plans, namely 5 branch offices/areas (credit, operational and funding), 9 business support, 3 Treasury & Forex, 13 head offices, and 18 audits in the field of information technology.</i>

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
<p>Membuat laporan hasil pemeriksaan atas tugas yang dilaksanakan untuk disampaikan kepada pihak-pihak yang berkepentingan termasuk Dewan Komisaris dan Direktur Utama.</p> <p><i>Prepare a report on the results of the audit of the tasks carried out to be submitted to interested parties including the Board of Commissioners and the President Director.</i></p>	<p>Hingga 31 Desember 2024, Satuan Kerja Audit Internal telah menyampaikan sebanyak 48 laporan hasil pemeriksaan kepada Direktur terkait dan membahas temuan yang dianggap signifikan kepada Dewan Komisaris melalui Komite Audit. Selain itu, laporan disampaikan salinannya kepada Dewan Komisaris, Komite Audit, serta Direktur Kepatuhan & Manajemen Risiko.</p> <p><i>As of 31 December 2024, the Internal Audit Work Unit has submitted 48 audit report results to the relevant Director and discussed findings that were considered significant to the Board of Commissioners through the Audit Committee. In addition, copies of the report were submitted to the Board of Commissioners, the Audit Committee, and the Director of Compliance & Risk Management.</i></p>
<p>Memastikan kebenaran Laporan Keuangan Bank telah sesuai dengan standar akuntansi yang berlaku.</p> <p><i>Ensure the accuracy of the Bank's Financial Report in accordance with applicable accounting standards.</i></p>	<p>Satuan Kerja Audit Internal telah melakukan tinjauan terhadap Laporan Publikasi Bank secara semester dan melaporkannya kepada Komite Audit.</p> <p><i>The Internal Audit Work Unit has reviewed the Bank's Publication Reports on a semester basis and reported them to the Audit Committee.</i></p>
<p>Satuan Kerja Audit Internal melakukan komunikasi dengan pihak regulator.</p> <p><i>The Internal Audit Work Unit communicates with regulators.</i></p>	<p>Sepanjang tahun 2024, Kepala SKAI telah melakukan komunikasi dengan Otoritas Jasa Keuangan secara langsung untuk membahas hal:</p> <ul style="list-style-type: none"> • Area berisiko yang diidentifikasi oleh Otoritas Jasa Keuangan dan Satuan Kerja Audit Internal; • Pemahaman tindakan mitigasi risiko yang dilakukan Bank; • Pemantauan tindak lanjut Bank atas kelemahan yang teridentifikasi; • Temuan dan rekomendasi dari pelaksanaan audit internal pada tahun berjalan; • Rencana audit tahunan; serta • Selain itu, Satuan Kerja Audit Internal telah menyampaikan laporan pelaksanaan dan pokok-pokok hasil audit internal melalui sistem pelaporan Otoritas Jasa Keuangan secara semesteran yang ditandatangani oleh Direktur Utama dan Komisaris Independen yang menjadi ketua Komite Audit. <p><i>Throughout 2024, the Head of SKAI has communicated directly with the Financial Services Authority to discuss:</i></p> <ul style="list-style-type: none"> • Risk areas identified by the Financial Services Authority and the Internal Audit Work Unit; • Understanding of risk mitigation actions taken by the Bank; • Monitoring of the Bank's follow-up on identified weaknesses; • Findings and recommendations from the implementation of internal audits in the current year; • Annual audit plan; and • In addition, the Internal Audit Work Unit has submitted reports on the implementation and main results of internal audits through the Financial Services Authority reporting system on a semester basis, signed by the President Director and Independent Commissioner who is the chairman of the Audit Committee.
<p>Merencanakan dan merealisasikan peningkatan mutu keterampilan sumber daya manusia secara berkala dan berkelanjutan.</p> <p><i>Plan and realize improvements in the quality of human resource skills periodically and sustainably.</i></p>	<p>Dalam upaya peningkatan, pengembangan pengetahuan, dan keterampilan personil secara berkesinambungan, setiap karyawan SKAI berkewajiban untuk mengikuti pelatihan minimal 40 jam/tahun dan menjadi parameter penilaian KPI.</p> <p>Tahun 2024, sebagai langkah dalam standarisasi kompetensi auditor, SKAI bekerjasama dengan Human Capital menyelenggarakan program sertifikasi bagi internal auditor oleh Badan Nasional Sertifikasi Profesi (BNSP) secara bertahap guna memastikan bahwa semua auditor internal telah memenuhi standar kompetensi yang ditetapkan.</p> <p><i>In an effort to continuously improve, develop knowledge, and skills of personnel, every SKAI employee is required to attend a minimum of 40 hours of training/year and become a KPI assessment parameter.</i></p> <p><i>In 2024, as a step in standardizing auditor competency, SKAI in collaboration with Human Capital will organize a certification program for internal auditors by the National Professional Certification Agency (BNSP) in stages to ensure that all internal auditors have met the established competency standards.</i></p>

Temuan dan Tindak Lanjut

Satuan Kerja Audit Internal senantiasa menganalisis data yang diberikan oleh setiap auditor. Hasil analisis tersebut selanjutnya disampaikan kepada Direksi sebagai temuan yang perlu ditindaklanjuti. Adapun temuan dan tindak lanjut hasil audit Satuan Kerja Audit Internal sepanjang tahun 2024 diungkapkan sebagai berikut:

Findings and Follow Up

The Internal Audit Work Unit continuously analyzes the data provided by each auditor. The results of the analysis are then submitted to the Board of Directors as findings that need to be followed up. The findings and follow-up of the Internal Audit Work Unit's audit results throughout 2024 are disclosed as follows:

Status <i>Status</i>	Total Temuan <i>Total Findings</i>	Persentase (%) <i>Percentage (%)</i>
Open	168	13%
Overdue	0	0%
Closed	1.139	87%
Total	1.307	100%

Audit IT

Salah satu tugas Satuan Kerja Audit Internal adalah melakukan audit penggunaan teknologi informasi (TI). Pelaksanaan audit TI tersebut senantiasa mengacu pada Kebijakan Prosedur Audit Internal TI No. 09/058/BSS/SKAI/XI/2023 tanggal 1 November 2023.

Di tahun 2024, Bank telah melaporkan hasil audit TI kepada OJK yang terdiri dari:

1. Internet and Mobile Banking Delivery Channels
2. Security Audit - BI Payments and Fund Transfer System
3. Open Banking and Partnership Systems
4. Digital Business
5. ATM Delivery Channels
6. Acquiring / Merchant Payment Systems
7. Layanan Perbankan Elektronik *Electronic Banking Services*
8. Credit Channeling and Digital Lending Systems
9. Jaringan Komunikasi Data *Data Communication Network*
10. Operasional IT *IT Operations*
11. Regulatory Reporting Systems - LPS
12. Core Banking and Branch Service System
13. Business Continuity dan Disaster Recovery Plan
14. Penggunaan Pihak Penyedia Jasa TI *Use of IT Service Providers*
15. Pengamanan Informasi dan Ketahanan Cyber *Information Security and Cyber Resilience*
16. Procurement, Budgeting, Finance and Accounting Systems
17. Conventional Credit System
18. Regulatory Reporting Systems - CIF and SLIK

Di sisi lain, sesuai dengan SEOJK No. 34/SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, Bank Sahabat Sampoerna tidak ikut serta dalam proses penyempurnaan pedoman manajemen risiko dan penyusunan Laporan Profil Risiko Triwulanan.

Pengembangan Kompetensi

Bank Sahabat Sampoerna senantiasa memfasilitasi Satuan Kerja Audit Internal untuk mengikuti kegiatan pengembangan kompetensi untuk memperluas pemahaman mengenai pelaksanaan tugas dan tanggung jawabnya. Sepanjang tahun 2024, Satuan Kerja Audit Internal telah mengikuti sejumlah kegiatan pengembangan kompetensi, di antaranya:

Topik Pelatihan <i>Training Topic</i>	Penyelenggara <i>Organizer</i>	Tanggal Pelatihan <i>Training Date</i>
Public Speaking for Auditor	IIAC	3 Februari <i>February 3</i>
Peran UU P2SK dalam Memberikan Efek Jera bagi Pelaku Jasa Keuangan Ilegal Confirmation	OJK	15 Februari <i>February 15</i>

IT Audit

One of the tasks of the Internal Audit Work Unit is to conduct audits on the use of information technology (IT). The implementation of the IT audit always refers to the IT Internal Audit Procedure Policy No. 09/058/BSS/SKAI/XI/2023 dated November 1, 2023.

In 2024, the Bank has reported the results of the IT audit to the OJK consisting of:

- 1. Internet and Mobile Banking Delivery Channels*
- 2. Security Audit - BI Payments and Fund Transfer System*
- 3. Open Banking and Partnership Systems*
- 4. Digital Business*
- 5. ATM Delivery Channels*
- 6. Acquiring / Merchant Payment Systems*
- 7. Layanan Perbankan Elektronik *Electronic Banking Services**
- 8. Credit Channeling and Digital Lending Systems*
- 9. Jaringan Komunikasi Data *Data Communication Network**
- 10. Operasional IT *IT Operations**
- 11. Regulatory Reporting Systems - LPS*
- 12. Core Banking and Branch Service System*
- 13. Business Continuity dan Disaster Recovery Plan*
- 14. Penggunaan Pihak Penyedia Jasa TI *Use of IT Service Providers**
- 15. Pengamanan Informasi dan Ketahanan Cyber *Information Security and Cyber Resilience**
- 16. Procurement, Budgeting, Finance and Accounting Systems*
- 17. Conventional Credit System*
- 18. Regulatory Reporting Systems - CIF and SLIK*

On the other hand, in accordance with SEOJK No. 34/SEOJK.03/2016 concerning the Implementation of Risk Management for Commercial Banks, Bank Sahabat Sampoerna did not participate in the process of improving risk management guidelines and preparing the Quarterly Risk Profile Report.

Competence Development

Bank Sahabat Sampoerna always facilitates the Internal Audit Work Unit to participate in competency development activities to broaden understanding regarding the implementation of its duties and responsibilities. Throughout 2024, the Internal Audit Work Unit has participated in a number of competency development activities, including:

Topik Pelatihan <i>Training Topic</i>	Penyelenggara <i>Organizer</i>	Tanggal Pelatihan <i>Training Date</i>
Data Privacy Breach : What to do based on UU PDP & ISO/IEC 27001:2022	Proxisis	29 Februari <i>February 29</i>
Business Data Analytics for Today and Future Improvement	YPIA	4-5 Maret <i>March 4-5</i>
Data Analysis for Internal Auditors	IIA	6-7 Maret <i>March 6-7</i>
Risk Management ISO 31000:2018	Mind Indonesia	19 Maret <i>March 19</i>
Peluang Pertumbuhan Kredit Pasca Berakhirnya Kebijakan Restrukturisasi Kredit <i>Credit Growth Opportunities After Credit Restructuring Policy Ends</i>	OJK	22 Mei <i>May 22</i>
Persyaratan Pendaftaran Penyedia Jasa Audit Teknologi Informasi <i>Registration Requirements for Information Technology Audit Service Providers</i>	KASPI	26 Juni <i>June 26</i>
Internal Auditor Readiness In Facing Cyber Attack	YPIA	6 Juli <i>July 6</i>
How to Prevent Money Laundering & Terrorism Financing	OJK	5 September <i>September 5</i>
Navigating The Global Internal Audit Standards	IIA	12-13 September <i>September 12-13</i>
Transforming GRC Through the Three Lines Model: a Pathway to Enchance Oversight and Control	IIAC	13 November <i>November 13</i>
Workshop LPS SCV	BI	25 November <i>November 25</i>
Industrial Test Penggunaan Aplikasi Key Survey LHPK SP dan FMI BI serta KPDHN tahun 2024	BI	21 November <i>November 21</i>
Kupas Tuntas POJK 15 Tahun 2024 : Integritas Pelaporan Keuangan Bank <i>In-Depth Review POJK 15 of 2024: Integrity of Bank Financial Reporting</i>	IAIB	13 Desember <i>December 13</i>

Penilaian Kinerja Satuan Kerja Audit Internal

Bank Sahabat Sampoerna senantiasa melakukan penilaian terhadap Satuan Kerja Audit Internal secara berkala untuk mengetahui efektivitas pelaksanaan tugasnya di sepanjang tahun buku. Penilaian tersebut dilakukan dengan metode penilaian sendiri atau *self-assessment* Tata Kelola Perusahaan (GCG), yang dalam penilaiannya dibantu oleh Satuan Kerja Kepatuhan. Adapun kriteria penilaian Bank berpedoman pada POJK No. 17 tahun 2023 dan SEOJK No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola Perusahaan bagi Bank Umum. Hasil penilaian tersebut selanjutnya dilaporkan kepada Direktur Kepatuhan & Manajemen Risiko.

Berdasarkan hasil *self-assessment* Tata Kelola Perusahaan (GCG) yang dilakukan Bank pada tahun 2024, Penerapan Fungsi Audit Intern memperoleh nilai komposit 1 atau "Low Risk". Hasil penilaian ini telah diungkapkan pada pembahasan mengenai Hasil *Self-Assessment* Tata Kelola Perusahaan (GCG) di dalam Laporan Tahunan ini.

Mekanisme Pengangkatan dan Pemberhentian Kepala Satuan Kerja Audit Internal

Proses pengangkatan dan pemberhentian Kepala Satuan Kerja Audit Internal menjadi wewenang dari Direktur Utama dan disetujui oleh Dewan Komisaris Bank dengan memperhatikan rekomendasi dari Komite Audit. Pengangkatan dan pemberhentian Kepala Satuan Kerja

Performance Assessment of Internal Audit Division

Bank Sahabat Sampoerna always periodically assesses the Internal Audit Work Unit to determine the effectiveness of its task implementation throughout the financial year. The assessment is carried out using the Corporate Governance (GCG) self-assessment method, which is assisted by the Compliance Work Unit. The Bank's assessment criteria are guided by POJK No. 17 of 2023 and SEOJK No. 13/SEOJK.03/2017 concerning the Implementation of Corporate Governance for Commercial Banks. The results of the assessment are then reported to the Director of Compliance & Risk Management.

Based on the results of the Corporate Governance (GCG) self-assessment conducted by the Bank in 2024, the Implementation of the Internal Audit Function obtained a composite score of 1 or "Low Risk". The results of this assessment have been disclosed in the discussion regarding the Results of the Corporate Governance (GCG) Self-Assessment in this Annual Report.

Mechanism of Appointment and Dismissal of Chief of Internal Audit

The appointment and dismissal process of the Chief of Internal Audit is the authority of the President Director and approved by the Board of Commissioners of the Bank by considering Audit Committee's recommendation. The appointment and dismissal of the Chief of Internal Audit

Audit Internal Bank harus segera disampaikan kepada Otoritas Jasa Keuangan.

Sistem Pengendalian Internal

Sistem pengendalian internal merupakan suatu mekanisme proses pengawasan yang ditetapkan oleh manajemen Bank secara berkesinambungan (*ongoing basis*) yang kualitas desain dan pelaksanaannya dipengaruhi oleh Dewan Komisaris, Direksi, serta seluruh pejabat dan pegawai Bank, dirancang untuk dapat memberikan keyakinan yang memadai guna:

1. Menjaga dan mengamankan aset Bank;
2. Menjamin tersedianya pelaporan keuangan dan manajerial yang akurat dan dapat dipercaya;
3. Meningkatkan kepatuhan Bank terhadap ketentuan dan peraturan perundang-undangan yang berlaku;
4. Mengurangi dampak keuangan atau dampak kerugian, penyimpangan, termasuk fraud, dan pelanggaran aspek kehati-hatian; dan
5. Meningkatkan efektivitas organisasi dan efisiensi biaya.

Sistem Pengendalian Internal dibentuk dengan mengacu pada SEOJK No. 35/SEOJK.03/2017 tentang Pedoman Standar Sistem Pengendalian Internal bagi Bank Umum tanggal 7 Juli 2017, yang kemudian disesuaikan dengan struktur organisasi Bank yang masih terus disempurnakan. Di samping itu, penerapan sistem pengendalian internal diselaraskan dengan nilai-nilai perusahaan dan budaya yang ada di dalam *Sampoerna Way*.

Penerapan sistem pengendalian internal senantiasa dimaksimalkan oleh Bank untuk menjaga keberlangsungan bisnis dan mencapai tujuan yang telah ditetapkan melalui upaya berikut.

1. Mengembangkan kerangka kerja sistem pengendalian internal yang dapat dijadikan pedoman bagi setiap karyawan dalam menerapkan sistem pengendalian internal sesuai dengan *job description* masing-masing.
2. Melakukan pengendalian dan pemindahan fungsi pada seluruh tingkatan fungsional, sesuai struktur organisasi Bank.
3. Menyelenggarakan sistem akuntansi, informasi, dan komunikasi manajemen risiko sesuai ketentuan dan perundang-undangan yang berlaku sehingga Bank mampu memfasilitasi pelaksanaan proses manajemen risiko yang komprehensif secara memadai.

Kesesuaian Pengendalian Internal dengan Surat Edaran Otoritas Jasa Keuangan dan Basel Committee Internal Control Framework

Penerapan Sistem Pengendalian Internal pada Bank berpedoman pada SEOJK No. 35/SEOJK.03/2017 tentang Pedoman Standar Sistem Pengendalian Internal bagi Bank Umum dan *Basel Committee Internal Control Framework*.

must immediately be reported to the Financial Services Authority

Internal Control System

The internal control system is a supervisory process mechanism that is determined by the Bank's management on an ongoing basis, the quality of the design and implementation of which is influenced by the Board of Commissioners, Directors, and all Bank officials and employees, designed to provide adequate assurance in order to:

1. *Maintain and secure Bank assets;*
2. *Ensure the availability of accurate and trustworthy financial and managerial reporting;*
3. *Improve the Bank's compliance with the applicable provisions and laws and regulations;*
4. *Reduce the financial impact or impact of losses, irregularities, including fraud, and violation of prudential aspects; and*
5. *Improve organization effectiveness and cost efficiency.*

The Internal Control System was established with reference to SEOJK No. 35/SEOJK.03/2017 concerning Standard Guidelines for Internal Control Systems for Commercial Banks dated July 7, 2017, which was then adjusted to the Bank's organizational structure which is still being refined. In addition, the implementation of the internal control system is aligned with the corporate values and culture in Sampoerna Way.

The internal control system implementation is constantly improved by the Bank to maintain its business continuity and achieve the set objectives through the following efforts.

1. *Developing an internal control system framework that can be used as a guide for each employee in implementing the internal control system in accordance with the respective job descriptions.*
2. *Controlling and transferring functions at all functional levels, in accordance with the Bank's organizational structure.*
3. *Carrying out risk management accounting, information, and communication system in accordance with the applicable laws and regulations so that the Bank can facilitate the implementation of a comprehensive risk management process adequately.*

Conformity of Internal Control with Financial Services Authority Circular and Basel Committee Internal Control Framework

Bank Sahabat Sampoerna is implementing the internal control system by referring to the Financial Services Authority Circular No. 35/SEOJK.03/2017 on Standard Guidelines for Internal Control System for Commercial Banks and the Basel Committee Internal Control Framework.

Ruang Lingkup Pengendalian Internal

Sebagaimana tercantum dalam Memo Kerangka Kerja (*Framework*) Sistem Pengendalian Intern (SPI) No. 09/05/MI/SKMR/V/18, ruang lingkup kerja pada Sistem Pengendalian Internal mencakup 5 (lima) elemen pokok yang saling berkaitan, yaitu:

1. Pengawasan oleh Manajemen dan Budaya Pengendalian
 - a. Tugas dan tanggung jawab Dewan Komisaris terkait sistem pengendalian internal, di antaranya:
 - Melakukan pengawasan terhadap pelaksanaan internal secara umum, termasuk kebijakan Direksi yang menerapkan pengendalian internal;
 - Memastikan adanya perbaikan terhadap permasalahan Bank yang dapat mengurangi efektivitas sistem pengendalian internal; serta
 - Melakukan review secara berkala atas pelaksanaan pengendalian internal dan validasi strategi Bank terhadap pengendalian internal yang ditetapkan.
 - b. Tugas dan tanggung jawab Direksi terkait sistem pengendalian internal, antara lain:
 - Menciptakan dan memelihara sistem pengendalian internal yang kuat dan efektif;
 - Memastikan sistem berjalan secara aman dan andal, sesuai tujuan pengendalian internal yang ditetapkan Bank;
 - Menetapkan kebijakan dan strategi, prosedur pengendalian internal, serta memantau kecukupan dan efektivitas sistem pengendalian internal; dan
 - Direktur yang membawahi fungsi kepatuhan wajib berperan aktif untuk mencegah adanya penyimpangan yang dilakukan oleh manajemen dalam menetapkan kebijakan dengan berlandaskan pada prinsip kehati-hatian.
 - c. Pengawasan aktif Dewan Komisaris dan Direksi dijalankan melalui penetapan dan pelaksanaan strategi bisnis, pengembangan dan penerapan manajemen risiko, penyusunan organisasi dan pendelegasian wewenang dengan akuntabilitas yang jelas, pengembangan kebijakan pengendalian internal, serta pemantauan terhadap kecukupan dan efektivitas sistem pengendalian internal yang telah ditetapkan. Dewan Komisaris dan Direksi berkepentingan untuk memastikan pengembangan lingkungan kerja Bank dikendalikan dengan baik. Terkait hal ini, Dewan Komisaris dan Direksi berupaya meningkatkan etika kerja dan integritas yang tinggi serta menciptakan budaya organisasi yang dapat memberikan pemahaman bagi seluruh karyawan mengenai pentingnya pengendalian internal yang berlaku di Bank.

Scope of Internal Control

As stated in the Internal Control System (SPI) Framework Memo No. 09/05/MI/SKMR/V/18, the scope of work in the Internal Control System includes 5 (five) main elements that are interrelated, namely:

1. *Management Supervision and Control Culture*
 - a. *Duties and responsibilities of Board of Commissioners related to the internal control system, include:*
 - *Supervising the implementation of internal control in general, including the Board of Directors' policies that apply internal control;*
 - *Ensuring improvements to the Bank's problems that can reduce the effectiveness of internal control system; and*
 - *Conducting review periodically on the implementation of internal control and validating the Bank's strategy on the established internal controls.*
 - b. *Duties and responsibilities of the Board of Directors related to the internal control system, include:*
 - *Establishing and maintaining strong and effective internal control system;*
 - *Ensuring that the system runs safely and reliably, in accordance with the internal control objectives set by the Bank;*
 - *Establishing policies and strategies, internal control procedures, and monitoring the adequacy and effectiveness of the internal control system; and*
 - *The Director in charge of the compliance function must play an active role in preventing any deviation by the Management in setting policies based on the precautionary principle.*
 - c. *Active supervision by the Board of Commissioners and Board of Directors is carried out by establishing and implementing business strategies, developing and implementing risk management, preparing organization, delegating authority with clear accountability, developing internal control policies, and monitoring the adequacy and effectiveness of the established internal control system. The Board of Commissioners and Board of Directors have interests to ensure that the development of the Bank's work environment is well-controlled. Regarding this matter, the Board of Commissioners and Board of Directors strive to improve work ethics and high integrity as well as create an organizational culture that can provide understanding for all employees on the importance of internal control in the Bank.*

2. Identifikasi dan Penilaian Risiko

Identifikasi, analisis, dan penilaian risiko merupakan serangkaian tindakan yang dilakukan oleh Direksi. Namun, agar cakupan audit yang dilakukan lebih luas dan menyeluruh, maka penilaian risiko didelegasikan kepada Satuan Kerja Audit Internal, dengan mempertimbangkan faktor internal maupun eksternal, serta dilakukan pada entitas ataupun tingkat aktivitasnya.

Pelaksanaan identifikasi dan penilaian terhadap risiko yang melekat pada kegiatan operasional Bank dilakukan secara terus-menerus, baik secara individual maupun keseluruhan (*composite*), yang dapat memengaruhi pencapaian sasaran. Penilaian risiko dapat mengidentifikasi jenis risiko yang dihadapi oleh Bank, baik risiko individual maupun secara keseluruhan (*aggregate*), penetapan limit risiko, dan teknik pengendalian risiko tersebut.

3. Kegiatan Pengendalian dan Pemisahan Fungsi Operasional

Kegiatan pengendalian melibatkan seluruh karyawan Bank, termasuk Direksi. Kegiatan pengendalian direncanakan dan diterapkan untuk mengendalikan risiko yang telah diidentifikasi. Kegiatan pengendalian mencakup penetapan kebijakan dan prosedur pengendalian, serta proses verifikasi lebih dini untuk memastikan bahwa kebijakan dan prosedur dipatuhi secara konsisten. Kegiatan pengendalian ini menjadi bagian yang tidak terpisahkan dari setiap fungsi atau kegiatan Bank sehari-hari.

Kegiatan pengendalian meliputi kebijakan, prosedur, dan praktik yang memberikan keyakinan bagi pejabat dan karyawan Bank bahwa arahan Dewan Komisaris dan Direksi Bank telah dilaksanakan secara efektif. Kegiatan pengendalian dapat membantu Direksi, termasuk Komisaris Bank, dalam mengelola dan mengendalikan risiko yang dapat memengaruhi kinerja atau mengakibatkan kerugian Bank. Kegiatan pengendalian diterapkan pada semua jabatan fungsional sesuai dengan struktur organisasi Bank yang meliputi kaji ulang manajemen, kaji ulang kinerja operasional, pengendalian sistem informasi, pengendalian aset fisik, dokumentasi atas kebijakan, sistem dan prosedur, prinsip *dual control*, dan mengatur mengenai mekanisme pelaporan pelanggaran serta sanksi atas tindakan pelanggaran tersebut.

Sistem pengendalian internal yang efektif mensyaratkan adanya pemisahan fungsi. Pemisahan fungsi dimaksudkan agar setiap karyawan dalam jabatannya tidak memiliki peluang untuk melakukan dan menyembunyikan kesalahan atau penyimpangan dalam pelaksanaan tugasnya pada seluruh jenjang organisasi dan seluruh langkah kegiatan operasional. Selain

2. Risk Identification and Assessment

Risk identification, analysis, and assessment are a series of actions taken by the Board of Directors. However, in order for the audit scope to be more extensive and comprehensive, the risk assessment is delegated to the Internal Audit Division, by considering the internal and external factors, and is carried out at the entity or the level of activity.

Identification and assessment of risks inherent in the Bank's operational activities are carried out continuously, both individually and as a whole (composite), which can affect the target achievement. Risk assessment can identify the types of risks faced by the Bank, both individual and overall risks (aggregate), determination of risk limits, and risk control techniques.

3. Control Activities and Separation of Operational Functions

Control activities involve all Bank employees, including the Board of Directors. Control activities are planned and implemented to control the identified risks. Control activities include the establishment of control policies and procedures, as well as an early verification process to ensure that the policies and procedures are consistently adhered to. These control activities become an inseparable part of everyday function or activity of the Bank.

These control activities include policies, procedures, and practices that provide assurance to the Bank's officials and employees that directions from the Bank's Board of Commissioners and Board of Directors have been effectively implemented. Control activities can assist the Board of Directors, including the Bank's Board of Commissioners, in managing and controlling risks that can affect the Bank's performance or cause losses. Control activities are applied to all functional positions in accordance with the Bank's organizational structure, which includes management review, operational performance review, information system control, physical asset control, documentation of policies, systems, and procedures, dual control principle, and regulates whistleblowing mechanism and sanction for such violation.

An effective internal control system requires separation of functions. Separation of functions is intended so that each employee in his/her position does not have the opportunity to make and hide mistakes or irregularities in implementing his/her duties at all organizational levels and all steps of operational activities. In addition, an effective internal control system avoids the granting

itu, dalam sistem pengendalian internal yang efektif, pemberian wewenang serta tanggung jawab yang dapat menimbulkan berbagai benturan kepentingan (*conflict of interest*) dihindari. Seluruh aspek yang dapat menimbulkan pertentangan kepentingan diidentifikasi, diminimalkan, dan dipantau secara hati-hati oleh pihak independen.

4. Sistem Akuntansi, Informasi, dan Komunikasi

Sistem Akuntansi, Informasi, dan Komunikasi Sistem akuntansi, informasi, dan komunikasi manajemen risiko Bank diselenggarakan sesuai dengan ketentuan dan perundang-undangan yang berlaku. Sistem ini harus mampu memfasilitasi pelaksanaan proses manajemen risiko yang komprehensif secara memadai.

Sistem akuntansi meliputi metode dan catatan dalam rangka mengidentifikasi, mengelompokkan, menganalisis, mengklasifikasi, mencatat/membukukan, dan melaporkan transaksi Bank. Sistem informasi harus dapat menghasilkan laporan mengenai kegiatan usaha, kondisi keuangan, penerapan manajemen risiko, serta pemenuhan ketentuan yang mendukung pelaksanaan tugas Dewan Komisaris dan Direksi. Sistem komunikasi harus mampu memberikan informasi pada seluruh pihak, baik internal maupun eksternal, seperti Otoritas Jasa Keuangan, Auditor Eksternal, Pemegang Saham, dan nasabah Bank.

5. Kegiatan Pemantauan dan Tindakan Koreksi Penyimpangan

Bank melakukan pemantauan secara terus-menerus terhadap efektivitas keseluruhan pelaksanaan pengendalian internal. Pemantauan terhadap risiko utama yang melekat harus diprioritaskan pada aktivitas bisnis dan operasional serta berfungsi sebagai bagian dari kegiatan Bank sehari-hari, termasuk evaluasi secara berkala, baik oleh Satuan Kerja Operasional maupun oleh Satuan Kerja Audit Internal.

Pemantauan kecukupan sistem pengendalian internal secara terus-menerus berkaitan dengan adanya perubahan kondisi internal dan eksternal. Bank memastikan bahwa fungsi pemantauan telah ditetapkan secara jelas dan terstruktur dengan baik dalam organisasi Bank, serta mengintegrasikan sistem pengendalian internal ke dalam kegiatan operasional Bank agar kegiatan pemantauan dapat berjalan secara efektif.

Tinjauan Efektivitas Sistem Pengendalian Internal

Satuan Kerja Audit Internal selaku *third lines of defense* Bank Sahabat Sampoerna senantiasa melakukan pemeriksaan terhadap efektivitas Sistem Pengendalian Internal melalui kegiatan audit berbasis risiko. Guna memaksimalkan

of authority and responsibility that can lead to various conflicts of interest. All aspects that can cause conflict of interest are identified, minimized, and monitored carefully by independent party

4. Accounting, Information, and Communication System

The Bank's risk management accounting, information, and communication system is implemented in accordance with the applicable provisions, laws and regulations. This system must be able to facilitate the implementation of a comprehensive risk management process adequately.

The accounting system includes methods and records in order to identify, categorize, analyze, classify, note/record, and report Bank transactions. The information system shall be able to produce reports on business activities, financial conditions, risk management implementation, and fulfillment of provisions that support the implementation of Board of Commissioners' and Board of Directors' duties. The Communication System shall be able to provide information to all parties, both internal and external, such as the Financial Services Authority, External Auditors, Shareholders, and Bank's customers

5. Monitoring Activities and Corrective Actions

The Bank continuously monitors the overall effectiveness of internal control. Monitoring inherent major risks must be prioritized on business and operational activities and serves as part of the Bank's daily activities, including periodic evaluations, both by the Operational division and by the Internal Audit Division.

Continuous monitor of the adequacy of internal control system is related to changes in internal and external conditions. The Bank ensures that the monitoring function is clearly defined and structured within the Bank's organization, and integrates an internal control system into the Bank's operational activities so that monitoring activities can run effectively.

Review of Internal Control System Effectiveness

The Internal Audit Work Unit as Bank Sahabat Sampoerna's third line of defense always conducts examinations of the effectiveness of the Internal Control System through risk-based audit activities. In order to maximize the

penerapan sistem pengendalian internal, Dewan Komisaris dan Direksi telah menerapkan berbagai strategi, antara lain:

1. Meningkatkan pemahaman risk culture secara terus-menerus di seluruh jenjang organisasi melalui sosialisasi dan pelatihan manajemen risiko.
2. Merumuskan kebijakan dan prosedur yang mendukung struktur pengendalian internal yang efektif.
3. Melakukan pertemuan dengan setiap divisi secara berkala untuk mengevaluasi sistem pengendalian internal dan menekan kemungkinan terjadinya kesalahan atau pelanggaran yang dapat menimbulkan kerugian.
4. Mewajibkan kepada seluruh karyawan untuk membaca, memahami, dan mematuhi peraturan atau ketentuan, baik internal maupun eksternal, serta sosialisasi melalui training dan berbagai kegiatan Bank.
5. Meningkatkan peran aktif Satuan Kerja Kepatuhan, Satuan Kerja Manajemen Risiko, dan Satuan Kerja Audit Internal sebagai divisi independen dalam aktivitas Bank.
6. Meningkatkan peran Komite Audit dan Komite Pemantau Risiko melalui pertemuan berkala, dalam melaksanakan pemantauan atas temuan signifikan dan temuan berisiko tinggi.

Berdasarkan hasil pemeriksaan terhadap efektivitas sistem pengendalian internal, Satuan Kerja Audit Internal menyimpulkan bahwa sistem pengendalian internal Bank telah memadai untuk memitigasi risiko yang secara signifikan dapat mengganggu operasional Bank, walaupun masih terdapat beberapa aspek pengendalian yang perlu ditingkatkan sehingga pengendalian internal menjadi lebih efektif dan efisien.

Pernyataan Direksi dan/atau Dewan Komisaris atas Kecukupan Sistem Pengendalian Internal

Dewan Komisaris dan Direksi selaku organ utama tata kelola perusahaan secara konsisten melakukan evaluasi terhadap penerapan sistem pengendalian internal Bank. Berdasarkan hasil evaluasi atas efektivitas dan kecukupan pengendalian internal Bank, khususnya pada kecukupan sistem, prosedur, struktur organisasi, sumber daya manusia, dan pelaporan, Dewan Komisaris dan Direksi menilai bahwa penerapan Sistem Pengendalian Internal di lingkungan Bank Sahabat Sampoerna telah berjalan dengan baik dan memadai, baik dari kecukupan infrastruktur maupun metode. Meski demikian, Bank berkomitmen untuk terus meningkatkan dan menyempurnakan kualitas penerapan sistem pengendalian internal agar mampu menjaga kinerja bank secara berkelanjutan.

implementation of the internal control system, the Board of Commissioners and Board of Directors have implemented various strategies, including:

1. *Continuously improve the understanding of risk culture at all levels of the organization through socialization and risk management training.*
2. *Formulate policies and procedures that support an effective internal control structure.*
3. *Conduct meetings with each division on a regular basis to evaluate the internal control system and reduce the possibility of errors or violations that can cause losses.*
4. *Requiring all employees to read, understand, and comply with the rules or regulations, both internal and external, as well as socialization through training and various Bank activities.*
5. *Increasing the active role of the Compliance Work Unit, Risk Management Work Unit, and Internal Audit Work Unit as independent divisions in the Bank's activities.*
6. *Increase the role of the Audit Committee and Risk Monitoring Committee through periodic meetings, in monitoring significant findings and high risk findings.*

Based on the results of the examination of the effectiveness of the internal control system, the Internal Audit Work Unit concluded that the Bank's internal control system was adequate to mitigate risks that could significantly disrupt the Bank's operations, although there were still several aspects of control that needed to be improved so that internal control became more effective and efficient.

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

The Board of Commissioners and the Board of Directors as the main organ of corporate governance consistently evaluate the implementation of the Bank's internal control system. Based on the evaluation of the effectiveness and adequacy of the Bank's internal control, particularly on the adequacy of systems, procedures, organizational structure, human resources, and reporting, the Board of Commissioners and the Board of Directors assessed that the implementation of the Internal Control System within Bank Sahabat Sampoerna has been running well and adequately, both from the adequacy of infrastructure and methods. Nevertheless, the Bank is committed to continuously improving and refining the quality of the implementation of the internal control system in order to be able to maintain the bank's performance on an ongoing basis.

Fungsi Kepatuhan

Compliance Function

Semakin meningkatnya kompleksitas kegiatan usaha yang dijalankan oleh Bank seiring dengan perkembangan industri perbankan, Bank dihadapkan pada penambahan eksposur risiko sehingga diperlukannya upaya dalam memitigasi risiko yang mungkin dihadapi. Untuk itu, Bank membentuk Fungsi Kepatuhan yang berperan dalam mencegah penyimpangan dan memastikan bahwa kegiatan yang dilakukan Bank telah sesuai dengan ketentuan dan perundang-undangan yang berlaku sehingga kinerja Bank menjadi yang lebih baik dan sehat.

The increasing complexity of business activities carried out by the Bank along with the development of the banking industry, the Bank is faced with additional risk exposure so that efforts are needed to mitigate the risks that may be faced. To that end, the Bank has formed a Compliance Function that plays a role in preventing deviations and ensuring that the activities carried out by the Bank are in accordance with applicable provisions and laws so that the Bank's performance becomes better and healthier.

Kebijakan kepatuhan Bank telah disahkan oleh Direksi dan dituangkan dalam Kebijakan Kepatuhan No. 09/065/MI/Sisdur/X/2012 tanggal 31 Oktober 2012. Kebijakan tersebut juga telah disempurnakan menjadi Kebijakan Kepatuhan No. BSS/KU-SKK/SDR/01 tanggal 1 Februari 2018 untuk disesuaikan dengan POJK No. 46/POJK.03/2017 tanggal 12 Juli 2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum.

The Bank's compliance policy has been approved by the Board of Directors and is stated in Compliance Policy No. 09/065/MI/Sisdur/X/2012 dated October 31, 2012. The policy has also been refined into Compliance Policy No. BSS/KU-SKK/SDR/01 dated February 1, 2018 to be adjusted to POJK No. 46/POJK.03/2017 dated July 12, 2017 concerning the Implementation of the Compliance Function of Commercial Banks.

Struktur Organisasi Fungsi Kepatuhan

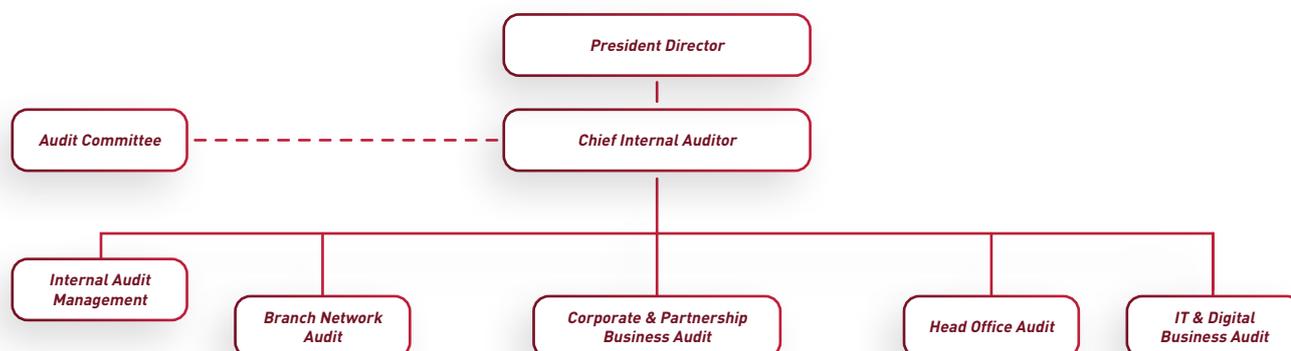
Organization Structure of Compliance Function

Pembentukan Fungsi Kepatuhan Bank tergambar melalui struktur organisasi Fungsi Kepatuhan Bank sebagaimana bagan berikut:

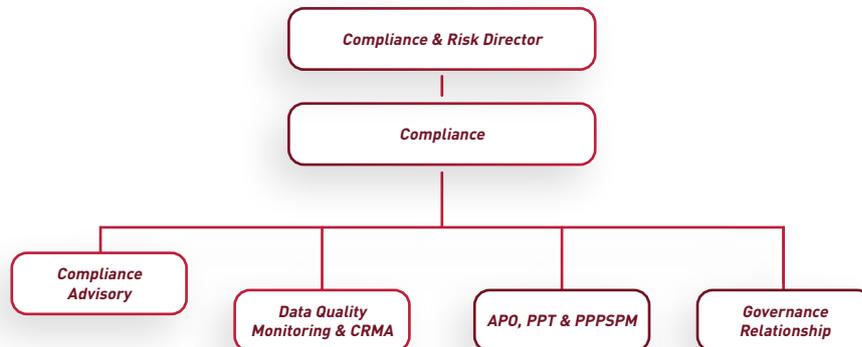
The establishment of the Bank's Compliance Function is illustrated through the organizational structure of the Bank's Compliance Function as shown in the following chart:

Kedudukan fungsi kepatuhan hingga dua level di bawah Presiden Direktur

Position of compliance function up to two levels below the President Director



Kedudukan fungsi kepatuhan hingga tiga level di bawah Presiden Direktur *Position of compliance function up to three levels below the President Director*



Pelaksanaan Fungsi Kepatuhan

Direktur Fungsi Kepatuhan

Bank telah menunjuk Direktur Kepatuhan & Manajemen Risiko sebagai koordinator atas Fungsi Kepatuhan Bank. Adapun tugas dan tanggung jawab Direktur Fungsi Kepatuhan, di antaranya:

1. Merumuskan strategi guna mendorong terciptanya Budaya Kepatuhan Bank.
2. Mengusulkan kebijakan kepatuhan atau prinsip-prinsip kepatuhan yang akan ditetapkan oleh Direksi.
3. Menetapkan sistem dan prosedur kepatuhan yang akan digunakan untuk menyusun ketentuan dan pedoman internal Bank.
4. Memastikan bahwa seluruh kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan, Bank Indonesia, dan peraturan perundang-undangan yang berlaku.
5. Meminimalkan risiko kepatuhan Bank.
6. Melakukan tindakan pencegahan agar kebijakan dan/atau keputusan yang diambil Direksi Bank tidak menyimpang dari ketentuan Bank Indonesia atau Otoritas Jasa Keuangan dan peraturan perundang-undangan yang berlaku.
7. Melakukan tugas-tugas lain terkait fungsi kepatuhan, yaitu:
 - a. Memastikan kepatuhan Bank terhadap komitmen yang dibuat oleh Bank kepada Otoritas Jasa Keuangan dan/ atau otoritas pengawas lain yang berwenang; dan
 - b. Melakukan sosialisasi kepada seluruh pegawai Bank mengenai hal-hal yang terkait dengan fungsi kepatuhan, terutama mengenai ketentuan yang berlaku, dan/atau bertindak sebagai narahubung (*contact person*) untuk permasalahan kepatuhan Bank bagi pihak internal maupun eksternal.

Executor of Compliance Function

Director of Compliance Function

The Bank has appointed Director of Compliance and Risk Management as the coordinator of the Bank's Compliance Function, with the following duties and responsibilities.

1. Formulating strategies in order to encourage the creation of the Bank's Compliance Culture.
2. Proposing compliance policies or compliance principles to be specified by the Board of Directors.
3. Establishing compliance system and procedure to be used in developing the Bank's internal provisions and guidelines.
4. Ensuring that all policies, regulations, systems, and procedures, as well as business activities conducted by the Bank are in accordance with provisions of the Financial Services Authority, Bank Indonesia, and the applicable laws and regulations.
5. Minimizing the Bank's compliance risk
6. Taking precaution measures so that the policies and/ or decisions taken by the Bank's Board of Directors do not deviate from the provisions of Bank Indonesia or Financial Services Authority and the applicable laws and regulations.
7. Performing other tasks related to the compliance function, which are:
 - a. Ensuring the Bank's compliance with the commitment made by the Bank to the Financial Services Authority and/ or other authorized supervisory authority; and
 - b. Disseminating information to all of the Bank's employees on matters related to compliance function, especially regarding the applicable regulations, and/or acting as a contact person for the Bank's compliance issues for internal and external parties.

Satuan Kerja Kepatuhan

Satuan Kerja Kepatuhan merupakan pihak yang melaksanakan Fungsi Kepatuhan Bank yang berperan dalam melaksanakan hal-hal seperti:

1. Mewujudkan terlaksananya budaya kepatuhan pada semua tingkatan organisasi dan kegiatan usaha perusahaan.
2. Mengelola risiko kepatuhan yang dihadapi perusahaan.
3. Memastikan agar kebijakan, ketentuan, sistem dan prosedur, serta kegiatan usaha yang dilakukan oleh perusahaan telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan.
4. Memastikan kepatuhan perusahaan terhadap komitmen yang dibuat oleh perusahaan kepada Otoritas Jasa Keuangan dan/atau otoritas pengawas lain yang berwenang.

Kedudukan Satuan Kerja Kepatuhan

Secara struktural, Satuan Kerja Kepatuhan berada di bawah pengawasan Direktur Kepatuhan & Manajemen Risiko. Dengan demikian, pertanggungjawaban pelaksanaan tugas Satuan Kerja Kepatuhan disampaikan langsung kepada Direktur Kepatuhan & Manajemen Risiko Bank.

Di tahun 2024, karyawan yang bertugas di Satuan Kerja Kepatuhan berjumlah 18 (delapan belas) orang yang terdiri dari:

- | | |
|-----------------------------------|-----------|
| 1. Compliance Head | : 1 Orang |
| 2. Data Quality Monitoring & CRMA | : 3 Orang |
| 3. Governance Relationship | : 1 Orang |
| 4. APU, PPT & PPPSPM | : 6 Orang |
| 5. Compliance Advisory | : 7 Orang |

Profil Kepala Satuan Kerja Kepatuhan

Bank menunjuk Emalia Indra Juanti sebagai Kepala Satuan Kerja Kepatuhan berdasarkan Surat Keputusan No. 001/HC_SK/BSS/III/2021.

Compliance Division

The Compliance Division is the party executing the Compliance Function of the Bank. This division has a role to perform the following actions.

1. Achieving the implementation of compliance culture at all organizational levels and business activities of the Company.
2. Managing the compliance risk faced by the Company.
3. Ensuring that policies, regulations, systems, and procedures as well as business activities conducted by the Company are in accordance with provisions of the Financial Services Authority and the applicable laws and regulations.
4. Ensuring the Bank's compliance with the commitment made by the Bank to the Financial Services Authority and/ or other authorized supervisory authority.

Position of Compliance Division

Structurally, the Compliance Division is under the supervision of the Compliance & Risk Director. Likewise, this division submitted its accountability of the implementation of duties directly to the Compliance & Risk Director.

In 2024, the Compliance Division of the Bank has 18 (eighteen) employees, consisting of:

- | | |
|-----------------------------------|------------|
| 1. Compliance Head | : 1 Person |
| 2. Data Quality Monitoring & CRMA | : 3 Person |
| 3. Governance Relationship | : 1 Person |
| 4. APU, PPT & PPPSPM | : 6 Person |
| 5. Compliance Advisory | : 7 Person |

Profile of Compliance Division Head

The Bank appointed Emalia Indra Juanti as Head of Compliance Work Unit based on Decree No. 001/HC_SK/BSS/III/2021

Emalia Indra Juanti Kepala Satuan Kerja Kepatuhan	
Kewarganegaraan <i>Citizenship</i>	Indonesia Indonesia
Usia <i>Age</i>	Jakarta Jakarta
Domisili <i>Domicile</i>	52 Tahun 52 years old
Dasar Hukum Pengangkatan <i>Legal Basis of Appointment</i>	Sejak 2021, berdasarkan Surat Keputusan No. 001/HC_SK/BSS/III/2021. Since 2021, based on Decree No. 001/HC_SK/BSS/III/2021.
Riwayat Pendidikan <i>Education</i>	<ul style="list-style-type: none"> • Magister Hukum, The University of Melbourne, Australia (1998) • Sarjana Hukum, Universitas Padjadjaran, Bandung (1991) • Master of Laws, The University of Melbourne, Australia (1998) • Bachelor of Laws, Padjadjaran University, Bandung (1991)
Keahlian <i>Expertise</i>	Hukum Legal

Sertifikasi Profesi <i>Professional Certification</i>	<ul style="list-style-type: none"> • Sertifikasi Kepatuhan Level 1 • Sertifikasi Manajemen Risiko Jenjang 5 • <i>Compliance Certification Level 1</i> • <i>Risk Management Certification Level 4</i>
Riwayat Pekerjaan <i>Work Experience</i>	<ul style="list-style-type: none"> • Corporate Secretary and Compliance Division Head PT Bank Sahabat Sampoerna (2020-2022) • Division Head of Corporate Secretary & License PT Bank Sahabat Sampoerna (2018-2020) • Division Head of Legal & Corporate Secretary PT Bank Sahabat Sampoerna (2016-2018) • Division Head of Corporate Legal PT Sahabat Sejati Kapital • General Counsel - Head of Legal AXA Indonesia • Vice President Legal ABN AMRO Bank • Legal Manager HSBC Indonesia
Rangkap Jabatan <i>Concurrent Positions</i>	Tidak memiliki rangkap jabatan di perusahaan lain di luar Grup Sampoerna Strategic. <i>Does not hold concurrent positions in other companies outside the Sampoerna Strategic Group.</i>
Hubungan Afiliasi <i>Affiliation Relationship</i>	Tidak memiliki hubungan keuangan, kepengurusan, dan kekeluargaan dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali. <i>Does not have financial, management, and family relationships with members of the Board of Commissioners, members of the Board of Directors, and Majority and Controlling Shareholders.</i>
Kepemilikan Saham <i>Share Ownership</i>	Tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic. <i>Does not own shares, either in Bank Sahabat Sampoerna or other companies affiliated with the Sampoerna Strategic Group.</i>

Tanggung Jawab dan Wewenang Satuan Kerja Kepatuhan

Satuan Kerja Kepatuhan menjalankan tanggung jawab sebagai berikut:

1. Membuat langkah untuk mendukung terciptanya budaya kepatuhan pada seluruh kegiatan usaha Bank pada setiap jenjang organisasi, antara lain melalui pembuatan sistem kerja, program, standard operating procedure (SOP), petunjuk pelaksanaan (Juklak), Kode Etik kepatuhan (*compliance Code of Conduct*), serta kebijakan kepatuhan (*compliance policy*).
2. Melakukan identifikasi, pengukuran, pemantauan, dan pengendalian terhadap risiko kepatuhan dengan mengacu pada ketentuan Otoritas Jasa Keuangan yang mengatur mengenai penerapan manajemen risiko bagi bank umum.
3. Menilai dan mengevaluasi efektivitas, kecukupan dan kesesuaian kebijakan, ketentuan, sistem, maupun prosedur yang dimiliki oleh Bank dengan ketentuan peraturan perundang-undangan, antara lain:
 - a. Menilai rancangan kebijakan, ketentuan, sistem, maupun prosedur baru; dan
 - b. Berinisiatif untuk menyempurnakan kebijakan, ketentuan, sistem, maupun prosedur berdasarkan informasi yang diperoleh.
4. Melakukan kaji ulang dan/atau merekomendasikan pengkinian dan penyempurnaan kebijakan, ketentuan, sistem, maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan perundang-undangan.
5. Melakukan upaya untuk memastikan bahwa kebijakan, ketentuan, sistem dan prosedur, serta kegiatan usaha Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan peraturan perundang-undangan.

Responsibilities and Authority of Compliance Division

The Compliance Division is performing the following responsibilities.

1. Making steps to support the creation of compliance culture in all of the Bank's business activities at every organizational level, among others, through creating work system, program, standard operating procedure (SOP), implementation instructions (Juklak), compliance Code of Conduct, and compliance policy.
2. Identifying, measuring, monitoring, and controlling compliance risk, by referring to the Financial Services Authority regulations on risk management implementation for commercial banks.
3. Assessing and evaluating the effectiveness, adequacy, and conformity of the Bank's policies, regulations, systems, and procedures against the provisions of laws and regulations, among others:
 - a. Assessing the design of new policies, provisions, systems, and procedures; and
 - b. Taking initiative to improve policies, regulations, systems, and procedures based on information obtained.
4. Reviewing and/or recommending updates and refinements of policies, provisions, systems, and procedures of the Bank to be in accordance with the provisions of Financial Services Authority and provisions of laws and regulations.
5. Taking measures to ensure that the policies, regulations, systems, and procedures, as well as the Bank's business activities are in accordance with the provisions of Financial Services Authority and provisions of laws and regulations.

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| <p>6. Melakukan tugas lain terkait Fungsi Kepatuhan, antara lain:</p> <ol style="list-style-type: none"> a. Memastikan kepatuhan perusahaan terhadap komitmen yang dibuat oleh Bank kepada Otoritas Jasa Keuangan dan/atau otoritas pengawas lain yang berwenang; b. Melakukan sosialisasi kepada seluruh karyawan mengenai hal-hal yang terkait dengan fungsi kepatuhan terutama mengenai ketentuan yang berlaku; dan/atau c. Bertindak sebagai narahubung (<i>contact person</i>) untuk permasalahan kepatuhan perusahaan, baik pihak internal maupun eksternal. | <p>6. <i>Performing other tasks related to the Compliance Function, among others:</i></p> <ol style="list-style-type: none"> a. <i>Ensuring the Bank's compliance with the commitment made by the Bank to the Financial Services Authority and/ or other authorized supervisory authority;</i> b. <i>Disseminating information to all employees on matters relating to compliance function, especially on the applicable provisions; and/or</i> c. <i>Acting as a contact person for company compliance issues, both internal and external party.</i> |
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Di samping itu, Satuan Kerja Kepatuhan juga memiliki wewenang untuk:

1. Membangun database peraturan perundangan yang berkaitan dengan bisnis Bank secara lengkap dan terkini berkaitan dengan bisnis Bank;
2. Menyebarkan referensi kepatuhan dan menyosialisasikannya;
3. Menjalankan fungsi sebagai tempat bertanya seluruh karyawan mengenai hal-hal terkait peraturan dan perundang-undangan; Melakukan uji kepatuhan terhadap proposal kredit dengan jumlah tertentu, produk dan/atau aktivitas baru maupun kebijakan dan prosedur sebelum diimplementasikan;
5. Mengakses semua bukti transaksi, catatan, maupun dokumen untuk diperiksa, jika diperlukan;
6. Mengidentifikasi risiko kepatuhan yang melekat pada setiap transaksi, termasuk transaksi baru dan/atau transaksi atas produk baru, secara proaktif;
7. Melakukan pemantauan dan memberi masukan, usulan, ataupun klarifikasi terhadap praktik yang dilakukan Bank; dan
8. Bertindak sebagai penghubung Bank dengan pihak otoritas atau pihak lain yang membuat peraturan.

Furthermore, the Compliance Division also has the authorities:

1. *To develop a database of laws and regulations relating to the Bank's business in a complete and up-to-date manner related to the Bank's business;*
2. *To distribute compliance references and disseminate them;*
3. *To run a function as a place for all employees to ask about matters related to laws and regulations;*
4. *To conduct compliance tests on loans proposals with a certain amount, new products and/or activities, as well as policies and procedures before being implemented;*
5. *To access all transaction evidence, records, and documents for inspection, if needed;*
6. *To identify compliance risks inherent in each transaction, including new transactions and/or transactions on new products, proactively;*
7. *To monitor and provide input, proposals, or clarification of practices conducted by the Bank; and*
8. *To act as a liaison between the Bank and the authorities or other parties that make the regulations.*

Tanggung Jawab dan Wewenang Kepala Satuan Kerja Kepatuhan

Kepala Satuan Kerja Kepatuhan mempunyai tanggung jawab dan wewenang yang dijelaskan sebagai berikut:

1. Menyampaikan setiap perkembangan dan perubahan peraturan perundang-undangan yang berlaku, yang berdampak signifikan pada Bank, serta memberi saran kepada Direksi terkait peraturan perundang-undangan yang berlaku.
2. Membuat petunjuk-petunjuk praktis untuk seluruh karyawan dalam rangka mengimplementasikan suatu peraturan perundang-undangan yang baru berlaku.
3. Menilai perlu tidaknya mengubah kebijakan pengelolaan kepatuhan sesuai kebutuhan.
4. Memantau dan melaporkan kepada Dewan Komisaris dan Direksi atau kepada Pemegang Saham dan pihak otoritas yang berwenang apakah kepatuhan telah dilaksanakan, termasuk apakah tindakan perbaikan sudah dilaksanakan jika terjadi ketidaksesuaian.

Responsibilities and Authority of the Compliance Division Head

The Compliance Division Head has the following responsibilities and authorities as explained below.

1. *To deliver any developments and changes in the applicable laws and regulations, which have a significant impact on the Bank, as well as to provide advice to the Board of Directors on relevant applicable laws and regulations.*
2. *To make practical guidelines for all employees in order to implement newly effective laws and regulations.*
3. *To assess whether or not to change compliance management policies as needed.*
4. *To monitor and report to the Board of Commissioners and Board of Directors or Shareholders and relevant authorities whether compliance has been carried out, including whether corrective action has been taken if there is a non-compliance.*

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| <p>5. Membentuk organisasi dan infrastruktur kepatuhan serta pengelolaan sumber daya lainnya agar tugas-tugas kepatuhan dilaksanakan dengan baik.</p> <p>6. Menyusun suatu Program Kepatuhan (<i>Compliance Program</i>) yang terdiri dari rencana aktivitas yang akan dilakukan, meliputi implementasi dan peninjauan terhadap pelaksanaan peraturan tertentu, melakukan penilaian kepatuhan, dan pelaksanaan <i>compliance testing</i>. Penyusunan <i>Compliance Program</i> ini dilakukan berdasarkan risiko kepatuhan terbesar yang sedang dihadapi Bank.</p> <p>7. Melakukan <i>enforcement</i> agar prinsip kepatuhan dipenuhi atau dilaksanakan oleh semua karyawan dan organisasi di Bank, baik dengan membina komitmen, menetapkan langkah pencegahan, merancang program tindak lanjut, dan meminta pihak terkait untuk melaksanakannya, serta mengenakan sanksi sesuai tata cara dan kebijakan Bank yang berlaku.</p> | <p>5. <i>To establish compliance organization and infrastructure and management of other resources so that compliance tasks are carried out properly.</i></p> <p>6. <i>To compile a Compliance Program which consists of planned activities to be carried out, including the implementation and review of the implementation of certain regulations, conducting compliance assessments, and implementing compliance testing. Compilation of the Compliance Program is based on the biggest compliance risk faced by the Bank.</i></p> <p>7. <i>To enforce so that compliance principles are fulfilled or implemented by all employees and organizations in the Bank, either by building commitment, establishing preventive measure, designing follow up program, or asking related parties to implement them, and imposing sanction in accordance with the applicable Bank procedures and policies.</i></p> |
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Pelaksanaan Tugas Satuan Kerja Kepatuhan

Implementation of Compliance Division's Duties

Pada tahun 2024, Satuan Kerja Kepatuhan telah melaksanakan tugas dan tanggung jawab melalui sejumlah program kerja, antara lain:

In 2024, the Compliance Division has implemented the following duties and responsibilities, as follows:

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
<p>Melaksanakan uji kepatuhan <i>Conducting compliance test</i></p>	<ul style="list-style-type: none"> • Melakukan uji kepatuhan/review untuk setiap kebijakan, prosedur, baik terkait perkreditan maupun non-perkreditan, serta produk dan/atau aktivitas baru yang akan dikeluarkan untuk memastikan kesesuaian kebijakan, prosedur, dan produk/aktivitas baru tersebut dengan peraturan perundang-undangan yang berlaku. Terhadap hasil review Satuan Kerja Kepatuhan, apabila ditemukan adanya hal-hal yang kurang sesuai dengan peraturan perundang-undangan yang berlaku, akan disampaikan ke unit kerja terkait untuk segera dilakukan perubahan atau penyesuaian sesuai dengan mekanisme yang berlaku. Apabila diperlukan, hasil review dapat dipresentasikan dalam rapat Direksi. • <i>Conducting compliance test/review for each policy, procedure, both related to credit and non-credit, as well as new product and/or activity that will be issued to ensure compliance with the new policy, procedure, and product/ activity with the applicable laws and regulations. Regarding Compliance Division's review results, in the event that there are matters not sufficiently in accordance with the applicable laws and regulations, it will be submitted to the relevant division for immediate action to amend or adjust to be in accordance with the applicable mechanism. If necessary, the review results can be presented at the Board of Directors' meeting.</i> • Melakukan uji kepatuhan untuk plafond kredit di atas Rp10 miliar dan/atau pemberian kredit kepada pihak terkait. • <i>Conducting compliance test for credit limit above Rp10 billion and/or credit extension to related parties.</i> • Melakukan review secara sampling terhadap uji kepatuhan yang dilakukan oleh cabang dan telah di analisa oleh Reviewer atas proposal kredit Rp5-Rp10 miliar yang telah disetujui. Hasil sampling disampaikan ke masing-masing cabang untuk ditindaklanjuti apabila terdapat ketidaksesuaian. • <i>Sampling the review of compliance test conducted by the branch, which has been analyzed by the Reviewer for credit proposal of Rp5 billion-Rp10 billion, which has been approved. Sampling results are submitted to each branch for further action in the event of a discrepancy.</i> • Melakukan uji kepatuhan terhadap surat-surat dan semua laporan yang akan disampaikan ke regulator sebelum disetujui oleh pejabat yang berwenang. • <i>Conducting compliance test on all letters and reports to be submitted to the regulator before being approved by the authorized official.</i> • Melakukan update checklist atas ketentuan terbaru yang diterima dari regulator sebagai kertas kerja compliance. • <i>Updating checklist on the latest provisions received from the regulator as Compliance working papers.</i> • Melaksanakan self-assessment terhadap Tata Kelola Perusahaan (GCG) setiap semester dan berkoordinasi dengan unit kerja terkait. • <i>Implementing self-assessment of Corporate Governance (GCG) every semester and coordinate with the relevant divisions.</i> • Melakukan uji kepatuhan terhadap permohonan perijinan atas produk dan/atau aktivitas baru, pembukaan cabang, penutupan cabang, relokasi cabang. • <i>Conducting compliance tests on licensing applications for new products and/or activities, branch openings, branch closures, branch relocations.</i> • Melaksanakan uji kepatuhan program APU-PPT & PPPSPM terhadap ketentuan internal Bank dan pengembangan produk baru. • <i>Conducting compliance test of AML-CTF & PFPWMD program with the Bank's internal regulations and new product development.</i> • Memberikan opini kepatuhan atas pertanyaan yang diajukan unit kerja lainnya. • <i>Provide a compliance opinion on questions from other divisions.</i>

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
<p>Memastikan kepatuhan Bank terhadap komitmen yang telah dibuat oleh Bank kepada Pengawas/Otoritas Jasa Keuangan dan/atau otoritas lain yang berwenang <i>Ensuring the Bank's compliance with the commitment made by the Bank to the Authority/ Financial Services Authority and/ or other authorized authority</i></p>	<ul style="list-style-type: none"> Bersama dengan Satuan Kerja Audit Internal memantau secara penuh terhadap seluruh perjanjian dan komitmen yang dibuat oleh Bank kepada pengawas, berdasarkan hasil pemeriksaan Otoritas Jasa Keuangan dan Bank Indonesia. Monitoring pemenuhan kewajiban pelaporan bank melalui Aplikasi Compliance Regulatory Monitoring Application (CRMA) yang senantiasa terus dikembangkan sesuai dengan ketentuan regulator terkini. Fully monitoring, together with the Internal Audit Division, all agreements and commitments made by the Bank to supervisors, based on the Financial Services Authority and Bank Indonesia audit results. Monitoring the fulfillment of bank reporting obligations through the Compliance Regulatory Monitoring Application (CRMA) which is constantly developed in accordance with the latest regulatory provisions.
<p>Rapat koordinasi triwulanan antara Satuan Kerja Kepatuhan, Satuan Kerja Audit Internal, dan Satuan Kerja Manajemen Risiko <i>Quarterly coordination meeting among Compliance Division, Internal Audit Division, and Risk Management Division</i></p>	<p>Mengadakan rapat koordinasi antara Satuan Kerja Kepatuhan, Satuan Kerja Audit Internal, dan Satuan Kerja Manajemen Risiko dalam rangka penguatan sistem pengendalian internal secara triwulanan. <i>Holding coordination meetings among Compliance Division, Internal Audit Division, and Risk Management Division in the context of strengthening the internal control system on a quarterly basis.</i></p>
<p>Review Rencana Bisnis Bank (RBB) <i>Reviewing Bank's Business Plans (RBB)</i></p>	<p>Melakukan review RBB sebelum disampaikan ke regulator, termasuk apabila terdapat revisi terhadap RBB dan juga terhadap laporan realisasinya. <i>Reviewing RBB before submitting it to the regulator, including if there are revisions to the RBB and also the realization report.</i></p>
<p>Review laporan yang akan disampaikan ke regulator <i>Reviewing report to be submitted to regulator</i></p>	<p>Memastikan setiap laporan yang akan disampaikan ke regulator melalui review dan uji kepatuhan dari Divisi Kepatuhan telah sesuai ketentuan regulator yang berlaku. <i>Ensuring that every report to be submitted to the regulators has gone through a review and compliance test by the Compliance Division and is in accordance with the applicable regulatory provisions.</i></p>
<p>Sosialisasi ketentuan regulator <i>Dissemination of regulatory provisions</i></p>	<ul style="list-style-type: none"> Setiap penerbitan ketentuan baru oleh regulator (pihak eksternal), berupa Peraturan Bank Indonesia, Peraturan Anggota Dewan Gubernur, Peraturan dan Surat Edaran Otoritas Jasa Keuangan, serta ketentuan perundang-undangan lainnya terkait penyedia jasa keuangan, dilakukan pendistribusian, dan disosialisasikan kepada unit-unit kerja terkait di Bank melalui e-mail regulation update. Every issuance of new provision by regulators (external parties), in the form of Bank Indonesia Regulation, Regulation of Member of Board of Governors, Regulation and Circular of Financial Services Authority, and other provisions of laws and regulations related to financial service providers, is distributed, and disseminated to the relevant work units at the Bank via regulation e-mail update. Hal yang berkaitan langsung dengan operasional perbankan dituangkan dalam aplikasi Compliance Regulatory Self-Assessment (CRSA) dan disampaikan kepada unit kerja terkait untuk dilakukan self-assessment, dengan tujuan unit terkait memahami dan mengaplikasikan dalam pelaksanaan transaksi. Matters directly related to banking operations are outlined in the Compliance Regulatory Self-Assessment (CRSA) application and submitted to the relevant work units for self-assessment, with the aim that the related units understand and apply such matters in executing transactions. Apabila terdapat ketentuan eksternal yang mengharuskan Bank membuat satu kebijakan internal, maka unit kerja terkait akan menginternalisasikan kebijakan tersebut untuk selanjutnya dilakukan uji kepatuhan sebelum meminta persetujuan kepada Dewan Komisaris dan/atau Direksi. If there are external provisions that require the Bank to make an internal policy, the relevant work unit will internalize the policy and then conduct a compliance test before requesting approval from the Board of Commissioners and/or Board of Directors. Kebijakan dan prosedur yang telah selesai disusun dan disetujui, selanjutnya didistribusikan oleh unit kerja pembuat kebijakan/SOP kepada seluruh unit kerja/kantor cabang untuk dipelajari, dipahami, dan diimplementasikan. Salah satu bentuk sosialisasi yang dilakukan yaitu melalui e-mail, acara morning briefing/morning enlightenment di cabang-cabang dan kantor pusat, serta diunggah ke portal e-library. Policy and procedure that have been prepared and approved, are then distributed by the policy/SOP making unit to all work units/branch offices to be studied, understood, and implemented. One form of dissemination is through e-mail, morning briefing/morning enlightenment at branch offices and head office and uploaded to the e-library portal. Jika ketentuan eksternal yang baru diperlukan tindak lanjut segera untuk memberikan pemahaman yang lebih baik dan menghindari adanya pengertian yang berbeda, maka dilakukan sosialisasi ketentuan-ketentuan tersebut secara langsung ke unit terkait. If a new external provision requires immediate follow-up to provide a better understanding and to avoid different interpretation, then this provision is disseminated directly to the relevant unit. Sosialisasi ketentuan regulator dan ketentuan internal Bank Sahabat Sampoerna juga dilakukan melalui kewajiban pemenuhan e-learning APU-PPT & Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massa (PPPSPM), Compliance Awareness, dan Kode Etik Karyawan bagi seluruh karyawan Bank, serta pemenuhan e-learning refreshment rutin tahunan APU-PPT & PPPSPM bagi karyawan cabang yang berhubungan langsung dengan nasabah. Regulatory provisions and Bank Sahabat Sampoerna's internal regulations are also disseminated through the fulfillment of AML-CTF & Prevention of Funding for the Proliferation of Weapons of Mass Destruction (PFPPWMD) e-learning requirements, Compliance Awareness, and Employee Code of Conduct for all Bank personnel, and fulfillment of annual routine AML-CTF & PFPPWMD e-learning refreshment for branch employees directly in contact with customers.

Program Kerja <i>Work Program</i>	Pelaksanaan <i>Implementation</i>
Implementasi dan pengembangan Aplikasi CRMA <i>Implementation and development of CRMA application</i>	<p>Bank telah mengimplementasikan dan terus mengembangkan aplikasi Compliance Regulatory Monitoring Application (CRMA), di mana salah satu fungsinya adalah memantau komitmen Bank terhadap pemenuhan kewajiban yang harus dilakukan Bank kepada pihak regulator/ pengawas. Kualitas implementasi dari aplikasi ini secara terus-menerus ditingkatkan dan menjadi salah satu sarana penting dalam proses penegakan budaya kepatuhan.</p> <p><i>The Bank has implemented and continues to develop the Compliance Regulatory Monitoring Application (CRMA) application, in which one of its functions is to monitor the Bank's commitment to fulfilling obligations that must be carried out by the Bank to the regulator/ supervisor. The implementation quality of this application is continuously improved and becomes one of the important tools in the process of upholding the compliance culture.</i></p>
Implementasi e-learning materi APU-PPT & PPPSPM, Compliance Awareness, dan Kode Etik Karyawan <i>Implementation of e-learning for AML-CTF & PFPWMD, Compliance Awareness, and Employee's Code of Conduct materials</i>	<p>Bekerja sama dengan Direktorat Sumber Daya Manusia dalam memantau implementasi pelaksanaan e-learning Materi APU-PPT & PPPSPM, Compliance Awareness, dan Kode Etik karyawan yang wajib diikuti oleh seluruh karyawan Bank Sahabat Sampoerna, di antaranya untuk meningkatkan pemahaman serta kesadaran terhadap budaya kepatuhan, Kode Etik Karyawan, dan penerapan APU-PPT & PPPSPM di Bank. Selain itu, dilakukan pemantauan terhadap pelaksanaan e-learning refreshment APU-PPT & PPPSPM yang wajib dilakukan oleh seluruh karyawan cabang yang berhubungan langsung dengan nasabah yang dilakukan secara berkala setiap tahun.</p> <p><i>Cooperating with the Human Resources Directorate in monitoring the implementation of e-learning of AML-CTF & PFPWMD, Compliance Awareness, and Employee's Code of Conduct materials that must be attended by all Bank Sahabat Sampoerna's employees, among others to increase understanding and awareness of the compliance culture, Employee's Code of Conduct, and implementation of AML-CTF & PFPWMD in the Bank. Furthermore, monitoring is conducted on the implementation of AML-CTF & PFPWMD e-learning refreshment programs that must be taken by all branch employees who deal directly with customers is monitored regularly every year.</i></p>
Program Sertifikasi Kepatuhan <i>Compliance Certification Program</i>	<p>Dalam memastikan SDM Fungsi Kepatuhan yang kompeten, telah dilakukan Program Sertifikasi Kepatuhan yang diselenggarakan oleh Forum Komunikasi Direktur Kepatuhan Perbankan (FKDKP) dan diikuti karyawan di Satuan Kerja Kepatuhan, yaitu:</p> <p><i>In ensuring competent HR for the Compliance Function, a Compliance Certification Program was organized by the Banking Compliance Director Communication Forum (FKDKP) and attended by employees in the Compliance Division, namely:</i></p> <ul style="list-style-type: none"> • <i>Direktur Compliance & Risk telah mengikuti pembekalan untuk sertifikasi Kepatuhan Level 3. Terkait hal ini akan diikutsertakan jadwal ujian sertifikasi pada periode berikutnya menyesuaikan dengan jadwal penyelenggaraan dari FKDKP.</i> • <i>The Compliance Director has participated in the compliance certification training level 3 for the certification exam, which will adjust to the FKDKP schedule;</i> • <i>Division Head Satuan Kerja Kepatuhan telah memenuhi sertifikasi kepatuhan Level 1 dan akan segera mengikuti sertifikasi kepatuhan Level 2 sebagai pemenuhan persyaratan jenjang sertifikasi kepatuhan.</i> • <i>The Head of Compliance Division has met level 1 Compliance certification qualification and will attend level 2 to meet the compliance certification requirements.</i> • <i>1 orang karyawan setingkat Group Head Satuan Kerja Kepatuhan telah memenuhi sertifikasi kepatuhan Level 2, sementara 1 orang karyawan setingkat Group Head ang belum memenuhi sertifikasi akan diikutsertakan pada periode berikutnya menyesuaikan dengan jadwal penyelenggaraan dari FKDKP.</i> • <i>1 employee at the Group Head level of the Compliance Work Unit has fulfilled Level 2 compliance certification, while 1 employee at the Group Head level who has not fulfilled the certification will be included in the next period in accordance with the implementation schedule of the FKDKP.</i> • <i>5 orang karyawan Satuan Kerja Kepatuhan telah memenuhi sertifikasi kepatuhan Level 1, sementara 9 orang karyawan yang belum memenuhi sertifikasi dan akan diikutsertakan pada periode berikutnya menyesuaikan dengan jadwal penyelenggaraan dari FKDKP.</i> • <i>5 employees of the Compliance Work Unit have fulfilled Level 1 compliance certification, while 9 employees have not fulfilled the certification and will be included in the next period according to the implementation schedule of the FKDKP.</i>
Compliance Awareness Program	<p>Sosialisasi Compliance Awareness saat ini menggunakan mekanisme e-Learning yang dikoordinasikan oleh Human Capital dengan konsep Digital Fun e-Learning. Dimana seluruh karyawan baik Cabang dan Kantor Pusat diwajibkan untuk ikut serta dalam e-Learning tersebut.</p> <p><i>Compliance Awareness socialization currently uses an e-Learning mechanism coordinated by Human Capital with the concept of Digital Fun e-Learning. Where all employees both Branches and Head Office are required to participate in the e-Learning.</i></p>
Penyesuaian kebijakan dan prosedur	<p>penyesuaian kebijakan dan prosedur pada unit Satuan Kerja Kepatuhan yang disesuaikan dengan ketentuan regulator yang berlaku, meliputi Kebijakan Khusus Standar Etika Karyawan, Revisi SOP Uji Kepatuhan versi 3, dan SOP Laporan Kepatuhan.</p> <p><i>Adjustments to policies and procedures were carried out in the Compliance Division in accordance with applicable regulatory provisions, including Special Policy on Employee Ethical Standards, Revision of Compliance Test SOP, and SOP Compliance Report.</i></p>

Pengembangan Kompetensi

Bank Sahabat Sampoerna senantiasa memfasilitasi Satuan Kerja Kepatuhan untuk mengikuti kegiatan pengembangan kompetensi untuk memperluas pemahaman mengenai pelaksanaan tugas dan tanggung jawabnya. Sepanjang tahun 2024, Satuan Kerja Kepatuhan telah mengikuti sejumlah kegiatan pengembangan kompetensi, di antaranya:

Topik Pelatihan <i>Training Topic</i>	Penyelenggara <i>Organizer</i>	Tanggal Pelatihan <i>Training Date</i>
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 4 <i>Risk Management Certification Training & Exam Level 4</i>	Garda	24 Januari <i>January 24</i>
Mengenal & Memitigasi Risiko TPPO di Perbankan <i>Understanding & Mitigating TPPO Risks in Banking</i>	PPATK	8 Maret <i>March 8</i>
Mengenal & Memitigasi Risiko Kejahatan Tekfin di Perbankan <i>Understanding & Mitigating Fintech Crime Risks in Banking</i>	PPATK	18 Maret <i>March 18</i>
Pelatihan Operasional APU PPT & PPPSPM Bank Devisa <i>AML-CTF & PFPWMD Operational Training for Foreign Exchange Banks</i>	OCBC NISP	3 Mei <i>May 3</i>

Penilaian Kinerja Satuan Kerja Kepatuhan

Untuk memastikan penerapan GCG yang komprehensif, Bank senantiasa melakukan penilaian terhadap Fungsi Kepatuhan secara berkala untuk mengetahui keefektifan pelaksanaan tugas selama tahun buku. Penilaian tersebut dilakukan dengan metode penilaian sendiri atau *self-assessment* Tata Kelola Perusahaan (GCG) dengan kriteria penilaian yang mengacu pada POJK No. 17 tahun 2023 dan SEOJK No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola Perusahaan bagi Bank Umum. Hasil dari penilaian tersebut selanjutnya dilaporkan kepada Direktur Kepatuhan & Manajemen Risiko dan dilaporkan ke Otoritas Jasa Keuangan sesuai dengan ketentuan waktu yang telah ditetapkan.

Berdasarkan hasil *self-assessment* Tata Kelola Perusahaan (GCG) yang dilakukan Bank pada tahun 2024, aspek Penerapan Fungsi Kepatuhan memperoleh nilai komposit 2 atau "BAIK". Hasil penilaian ini telah diungkapkan pada pembahasan mengenai Hasil *Self-Assessment* Tata Kelola Perusahaan (GCG) di dalam Laporan Tahunan ini.

Mekanisme Pengangkatan dan Pemberhentian Kepala Satuan Kerja Kepatuhan

Proses pengangkatan dan pemberhentian Kepala Satuan Kerja Kepatuhan menjadi wewenang dari Direktur Kepatuhan & Manajemen Risiko dan disetujui oleh Direktur Utama Bank. Pengangkatan dan pemberhentian Satuan Kerja Kepatuhan harus segera disampaikan kepada Otoritas Jasa Keuangan.

Competency Development

Bank Sahabat Sampoerna always facilitates the Compliance Work Unit to participate in competency development activities to broaden understanding regarding the implementation of its duties and responsibilities. Throughout 2024, the Compliance Work Unit has participated in a number of competency development activities, including:

Performance Assessment of Compliance Division

The Bank assess the Compliance Function periodically to learn about the effectiveness of duties implementation in the fiscal year. This assessment is conducted using Corporate Governance (GCG) self-assessment method while the Bank's assessment criteria is referring to the Financial Services Authority Regulation No. 17 of 2023 and Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Corporate Governance for Commercial Banks. The assessment results are reported to the Compliance & Risk Director and reported to the Financial Services Authority in line with the stipulated time requirements.

Based on the results of the Bank's Corporate Governance (GCG) self-assessment in 2024, the Compliance Function Implementation aspect received a composite score of 2 or "GOOD". The results of this assessment have been disclosed in the discussion on the Results of the Corporate Governance (GCG) Self-Assessment in this Annual Report.

Mechanism of Appointment and Dismissal of Compliance Division Head

The appointment and dismissal process of Compliance Division Head is the authority of Compliance & Risk Director and approved by the Bank's President Director. Any appointment and dismissal on the Compliance Division must immediately be reported to the Financial Services Authority.

Program Anti Pencucian Uang dan Pencegahan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (APU PPT & PPPSPM)

Bank Sahabat Sampoerna telah membentuk unit kerja khusus APU-PPT & PPPSPM yang berada di bawah Satuan Kerja Kepatuhan Bank. Unit kerja ini akan bertindak sebagai penanggung jawab penerapan Program APU-PPT & PPPSPM, sesuai dengan ketentuan terkini, yakni POJK No. 8 Tahun 2023 tentang Penerapan Program APU-PPT & PPPSPM di Sektor Jasa Keuangan yang diinternalisasikan pada Kebijakan Khusus APU-PPT & PPPSPM No. BSS/KK/PMN-SDR/04.

Penerapan program APU-PPT & PPPSPM pada Bank Sahabat Sampoerna dilakukan dengan mengacu pada 5 (lima) pilar utama, yaitu:

1. Pengawasan Aktif Direksi dan Komisaris

Direksi dan Dewan Komisaris melaksanakan kewajiban pengawasan sesuai Peraturan Otoritas Jasa Keuangan yang berlaku.

2. Kebijakan dan Prosedur

Bank memiliki kebijakan dan prosedur yang merujuk pada peraturan-peraturan lembaga pengawasan dan pengatur terkini, serta sesuai dengan perkembangan bisnis Bank.

3. Pengendalian Internal

Pada Bank terdapat SKAI dan Unit Kerja Khusus APU PPT & PPPSPM yang melaksanakan pengawasan internal penerapan Program APU-PPT & PPPSPM, serta memastikan kepatuhan pelaporan dan kualitas pelaporan kepada PPATK dan Otoritas Jasa Keuangan.

4. Sistem Informasi dan Teknologi

Bank memiliki *core banking system* yang memenuhi Peraturan Otoritas Jasa Keuangan yang berlaku, serta menggunakan alat bantu pelaporan kepada PPATK, yang terus-menerus disempurnakan sejalan dengan peraturan terkini dan perkembangan bisnis Bank.

5. Sumber Daya Manusia dan Pelatihan

Bank memiliki program penyaringan dan pemantauan karyawan (*know your employee*) dan menyediakan berbagai program pelatihan terkait APU-PPT & PPPSPM kepada seluruh karyawan, baik secara mandiri maupun bekerja sama dengan Otoritas Jasa Keuangan dan PPATK, serta lembaga lainnya.

Anti-Money Laundering - Counter Terrorism Financing & Prevention of Funding for the Proliferation of Weapons of Mass Destruction Program (AML-CTF & PFPWMD)

The AML-CTF & PFPWMD Special Task Force is under the Bank's Compliance Division, and is responsible for the implementation of AML-CTF & PFPWMD program, following the latest provision, from Financial Services Authority Regulation No. 8 of 2023 on the implementation of AML-CTF and PFPWMD Program in Financial Services Sector, which is internalized in the AML-CTF & PFPWMD Special Policy No. BSS/KK/PMN/SDR04.

The Bank has implemented the AML-CTF & PFPWMD program based on 5 implementation pillars, as follows:

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

The Board of Directors and Board of Commissioners perform supervision in line with the applicable Financial Services Authority Regulations.

2. Policies and Procedures

The Bank has policies and procedures, referring to the latest regulations of supervisory and regulatory institutions, and in line with the Bank's business developments.

3. Internal Control

The Bank has SKAI and AML-CTF & PFPWMD Special Task Force to implement internal supervision of AML CTF & PFPWMD Program implementation and ensure reporting compliance and reporting quality to PPATK and the Financial Services Authority.

4. Information and Technology System

The Bank has a core banking system in compliance with the applicable Financial Services Authority Regulations, and uses reporting tools to PPATK, which are continuously refined in line with the latest regulations and Bank business developments.

5. Human Resources and Trainings

The Bank has employee screening and monitoring program (know your employee) and provide various AML-CTF & PFPWMD training programs for all employees, organized both independently and in collaboration with the Financial Services Authority and PPATK, as well as other institutions.

Kode Etik

Code of Conduct

Bank Sahabat Sampoerna menjadikan Kode Etik sebagai pedoman yang harus diikuti dan diimplementasikan oleh seluruh Insan Bank dalam menjalankan kegiatan usaha maupun operasi sehari-hari secara beretika dan berintegritas. Bank secara berkala melakukan evaluasi untuk memperbaharui Kode Etik yang dimiliki apabila diperlukan agar tetap relevan dengan perkembangan regulasi, norma, dan bisnis Bank yang bersifat dinamis. Adapun Kode Etik yang dimiliki oleh Bank Sahabat Sampoerna telah disahkan pada 4 Mei 2015 dan dinilai masih relevan dengan bisnis Bank saat ini.

Pokok-Pokok Kode Etik

Secara garis besar, pokok-pokok Kode Etik Bank Sahabat Sampoerna terdiri dari:

1. Noneai-Nilai Budaya Perusahaan
2. Budaya Kepatuhan
3. Anti-Fraud/Anti Suap/Anti-Korupsi
4. *Mis-Selling/Mis-Represent* Produk dan Jasa
5. Mencegah Pencucian Uang
6. Menghindari Benturan Kepentingan
7. Menjaga Kerahasiaan dan Perlindungan Data
8. Menghindari Berkompromi karena Hadiah/Hiburan
9. Cepat dan Tanggap Menangani Keluhan Nasabah
10. Berani Bicara
11. Penggunaan Peralatan dan Fasilitas

Pemberlakuan Kode Etik bagi Karyawan Bank

Bank telah memiliki Kode Etik yang disahkan berdasarkan Surat No. 09/026/MI/SKK/IX/2024 pada 26 September 2024. Kode Etik ini berlaku bagi Dewan Komisaris, Direksi, dan karyawan Bank. Seluruh karyawan telah menandatangani pernyataan bahwa yang bersangkutan telah memahami dan akan menaati serta menjalankan Kode Etik Bank Sahabat Sampoerna.

Bank Sahabat Sampoerna makes the Code of Ethics a guideline that must be followed and implemented by all Bank Personnel in carrying out business activities and daily operations ethically and with integrity. The Bank periodically evaluates to update the Code of Ethics if necessary to remain relevant to the development of regulations, norms, and the Bank's dynamic business. The Code of Ethics owned by Bank Sahabat Sampoerna was ratified on May 4, 2015 and is considered still relevant to the Bank's current business.

Principles of Code of Conduct

In general, the main points of the Bank Sahabat Sampoerna Code of Ethics consist of:

1. *Corporate Culture Values*
2. *Compliance Culture*
3. *Anti-Fraud/Anti-Bribe/Anti-Corruption*
4. *Mis-Selling/Mis-Representation of Products and Services*
5. *Preventing Money Laundering*
6. *Avoiding Conflict of Interest*
7. *Maintaining Data Privacy and Protection*
8. *Avoiding Compromising due to Gifts/Entertainment*
9. *Being Quick and Responsive in Handling Customer Complaints*
10. *Speak Up*
11. *Use of Equipment and Facility*

Implementation of Code of Ethics for Bank Employees

The Bank has a Code of Ethics that has been ratified based on Letter No. 09/026/MI/SKK/IX/2024 on September 26, 2024. This Code of Ethics applies to the Board of Commissioners, Directors, and employees of the Bank. All employees have signed a statement that they have understood and will obey and implement the Bank Sahabat Sampoerna Code of Ethics.

Wajib dipatuhi seluruh insan Bank di seluruh level organisasi, termasuk Dewan Komisaris dan Direksi.

Must be adhered to by all Bank personnel at all organizational levels, including the Board of Commissioners and Board of Directors.

Wajib membuat pernyataan kepatuhan terhadap Kode Etik atau menandatangani Pakta Integritas.

Must make a statement of compliance with the Code of Conduct or sign the Integrity Pact.

Penerapan sanksi bagi setiap pihak yang terbukti melanggar Kode Etik.

Imposing sanctions for any party proven to have violated the Code of Conduct

Sosialisasi dan Internalisasi Kode Etik

Bank secara berkala melakukan kegiatan sosialisasi Kode Etik melalui kegiatan internal kepada seluruh karyawan. Sosialisasi kode etik ini bertujuan untuk meningkatkan kesadaran para karyawan untuk terus menjalankan kegiatan operasional secara beretika dan berintegritas. Sosialisasi Kode Etik Bank dilakukan melalui 2 (dua) cara, yakni:

E-Learning	Wajib bagi seluruh karyawan Mandatory for all employees
Situs Web Internal Internal Web Site	Akses bagi karyawan terkait informasi Kode Etik. Access for employees regarding Code of Ethics information.

Information Dissemination and Internalization of the Code of Ethics

The Bank periodically conducts Code of Ethics socialization activities through internal activities to all employees. The socialization of this code of ethics aims to increase employee awareness to continue to carry out operational activities ethically and with integrity. Socialization of the Bank's Code of Ethics is carried out in 2 (two) ways, namely

Jenis Sanksi Pelanggaran Kode Etik

Pembinaan Periodik Periodical Development	Permintaan Ganti Rugi Compensation Request
Surat Teguran Reprimand Letter	Peringatan Lisan Verbal Warning
Pengurangan Upah Wage Reduction	Pemberhentian Sementara Temporary Suspension
Verbal Reprimand	Pemutusan Hubungan Kerja Termination of Employment
Surat Peringatan 1, 2, dan 3 Warning Letter 1,2 and 3	Penurunan atau Pemindahan dari Jabatan Karyawan Demotion or Transfer from Employee Position
Penindakan Secara Hukum Legal Actions	

Sanctions for Violating Code of Conduct

Pengungkapan Pelanggaran Kode Etik dan Tindak Lanjut

Bank menegakkan Kode Etik yang dimiliki dengan mengenakan sanksi atas pelanggaran yang terjadi sesuai dengan tingkat pelanggaran yang dilakukan. Bank telah menunjuk Direktorat Sumber Daya Manusia sebagai penanggung jawab atas penerapan Kode Etik, termasuk pelanggaran yang terjadi, di lingkungan Bank. Adapun rincian sanksi yang dikenakan atas pelanggaran kode etik Bank dalam 2 (dua) tahun terakhir dapat dilihat sebagai berikut:

Disclosure of Code of Ethics Violations and Follow-up

The Bank enforces its Code of Ethics by imposing sanctions for violations that occur according to the level of violation committed. The Bank has appointed the Human Resources Directorate as the person responsible for implementing the Code of Ethics, including violations that occur, within the Bank. The details of sanctions imposed for violations of the Bank's code of ethics in the last 2 (two) years can be seen as follows:

Sanksi Sanctions	2024	2023
Tindakan Disiplin Ringan Minor Disciplinary Action	8	11
Tindakan Disiplin Sedang Moderate Disciplinary Action	12	2
Tindakan Disiplin Berat Severe Disciplinary Action	0	0
Jumlah Total	20	13

Tata Kelola Teknologi Informasi

Information Technology Governance

Dalam menjawab perubahan tren ke arah digital, Bank menyadari bahwa pengelolaan Teknologi Informasi (TI) memegang peranan strategis untuk mendukung kelancaran kegiatan operasional dan keamanan pengolahan data dan informasi. Pengelolaan TI yang baik juga diyakini dapat memberikan peningkatan efisiensi kegiatan operasional dan mutu pelayanan Bank. Atas dasar ini, Bank Sahabat Sampoerna senantiasa memanfaatkan TI guna menyediakan produk dan layanan terbaik serta meminimalisir risiko operasional bisnis yang dihadapi.

Tata Kelola TI (*IT Governance*) dibentuk untuk menyeimbangkan strategi Bank dengan aktivitas Unit Kerja TI. Penerapan tata kelola TI ini berpedoman pada RSTI 2024-2026 dan peraturan perundang-undangan yang berlaku serta senantiasa memperhatikan ketersediaan SDM, manajemen risiko, dan pengukuran kinerja terbaik, sehingga tercipta nilai keberlanjutan untuk jangka panjang dan mampu memberi kontribusi yang lebih besar bagi iklim usaha yang kondusif.

Kebijakan dan Strategi Pengelolaan Teknologi Informasi

Pemanfaatan TI dilakukan secara masif oleh Bank Sahabat Sampoerna dengan tujuan untuk mengoptimalkan aktivitas operasional dan memberikan kemudahan yang tepat guna bagi para nasabah. Bank terus melanjutkan pengembangan layanan *Digital Onboarding*, yaitu mengintegrasikan layanan Mobile Banking dengan E-KYC sehingga memudahkan nasabah dalam melakukan pembukaan rekening dari mana saja.

Bank juga terus memaksimalkan pengendalian risiko keamanan informasi dan senantiasa menjaga kepercayaan nasabah dengan mempertahankan kepemilikan sertifikasi ISO 27001:2013 dengan ruang lingkup meningkatkan Sistem Manajemen Keamanan Informasi (SMKI) pada pengembangan dan operasional PDaja.com dan Sampoerna Mobile Banking, serta penerapan *web application firewall* dan *security operations center*.

Dalam rangka memaksimalkan penerapan tata kelola TI, Bank menerapkan standar prosedur sebagai berikut:

1. *System Development Life Cycle (SDLC)*
Prosedur dan tata kelola TI terkait pengadaan, perubahan, dan peningkatan sistem.

In responding to the changing trend towards digital, the Bank realizes that Information Technology (IT) management plays a strategic role in supporting the smooth running of operational activities and the security of data and information processing. Good IT management is also believed to be able to provide increased efficiency of operational activities and the quality of Bank services. On this basis, Bank Sahabat Sampoerna always utilizes IT to provide the best products and services and minimize the operational risks of the business faced.

IT Governance is formed to balance the Bank's strategy with the activities of the IT Work Unit. The implementation of this IT governance is guided by RSTI 2024-2026 and applicable laws and regulations and always pays attention to the availability of HR, risk management, and the best performance measurement, so that sustainable value is created for the long term and is able to make a greater contribution to a conducive business climate.

Information Technology Management Policy and Strategy

Bank Sahabat Sampoerna has been massively utilizing IT with the aim of optimizing operational activities and providing appropriate convenience for customers. The Bank continues to develop its Digital Onboarding service, namely integrating Mobile Banking services with E-KYC to make it easier for customers to open accounts from anywhere.

The Bank also continues to maximize information security risk control and always maintains customer trust by maintaining ownership of ISO 27001:2013 certification with the scope of improving the Information Security Management System (ISMS) in the development and operation of PDaja.com and Sampoerna Mobile Banking, as well as implementing web application firewalls and security operations centers.

In order to maximize the implementation of IT governance, the Bank implements the following standard procedures:

1. *System Development Life Cycle (SDLC)*
IT procedures and governance related to procurement, changes, and system improvements.

2. Change Management

Prosedur pengelolaan perubahan sistem baik dari sisi aplikasi, perangkat keras, maupun infrastruktur di area produksi.

3. Service Management

Prosedur yang berkaitan dengan penyediaan personil yang mendukung operasional TI, standar proses eskalasi, dan standar *service level agreement* (SLA).

4. Data Center Operation

Prosedur standar dalam menjalankan operasional data center mencakup operation management, system management, network management, media storage keeping, serta memastikan kapasitas dan kemampuan DRC.

IT Disruption

Disrupsi teknologi merupakan perubahan fundamental yang terjadi ketika teknologi baru muncul dan mengubah pola masyarakat menjalankan bisnis, pola konsumen berinteraksi, dan pola industri beroperasi. Dalam menjawab tantangan tersebut, Bank telah menerapkan strategi sebagai berikut:

1. Berkolaborasi dengan mitra-mitra strategis dalam hal pengembangan teknologi baru.
2. Pengembangan produk dan peningkatan pengalaman pengguna yang berfokus untuk menjaga kepuasan di sisi pengguna.
3. Investasi pada teknologi Kecerdasan Buatan (*Artificial Intelligence*).
4. Peningkatan dalam Keamanan Siber yang bertujuan untuk memberikan tingkat keamanan atas data dan transaksi pengguna.
5. Kepatuhan atas regulasi untuk memastikan bahwa inovasi yang dilakukan sesuai dengan regulasi yang ada.

Cyber Security

Bank Sahabat Sampoerna menyadari peningkatan layanan TI menyadari adanya peningkatan ancaman keamanan informasi. Untuk itu, Bank akan meningkatkan program yang mengacu pada SEOJK No.29/SEOJK.03/2022

Dalam rangka mencegah terjadinya serangan maupun ancaman yang masuk ke Perseroan melalui dunia maya, Bank telah melakukan berbagai upaya, seperti:

2. Change Management

Procedures for managing system changes in terms of applications, hardware, and infrastructure in the production area.

3. Service Management

Procedures related to the provision of personnel to support IT operations, escalation process standards, and service level agreement (SLA) standards.

4. Data Center Operation

Standard procedures in running data center operations include operation management, system management, network management, media storage keeping, and ensuring DRC capacity and capabilities.

IT Disruption

Technological disruption is a fundamental change that occurs when new technology emerges and changes the way people do business, the way consumers interact, and the way industries operate. In responding to these challenges, the Bank has implemented the following strategies:

1. *Collaborating with strategic partners in developing new technologies.*
2. *Product development and improving user experience that focuses on maintaining user satisfaction.*
3. *Investment in Artificial Intelligence technology.*
4. *Improvement in Cybersecurity that aims to provide a level of security for user data and transactions.*
5. *Compliance with regulations to ensure that innovations are in accordance with existing regulations.*

Cyber Security

Bank Sahabat Sampoerna is aware of the increase in IT services aware of the increase in information security threats. For this reason, the Bank will improve the program that refers to SEOJK No.29/SEOJK.03/2022

In order to prevent attacks or threats entering the Company through cyberspace, the Bank has made various efforts, such as:

1. *Security Operation Center - SOC 24/7.*
2. *Annual Pentest.*
3. *Program Security Awareness kepada seluruh karyawan maupun pihak Penyedia Jasa TI.*
4. *Peningkatan Anti Malware ke Endpoint Detection and Response - EDR.*
5. *Peningkatan kemampuan pengelolaan aset (Asset Management).*
6. *Peningkatan kapabilitas Identity and Access Management.*
7. *Peningkatan kemampuan Perangkat Network and Security Devices.*
8. *Penerapan pencegahan kebocoran data (Data Loss Prevention - DLP).*
9. *Program Peta Jalan Keamanan Siber secara berkelanjutan.*
10. *Pembentukan tim tanggap insiden siber.*

Disaster Recovery

Bank Sahabat Sampoerna berupaya untuk mengatasi berbagai potensi risiko dan mengamankan kelangsungan operasional dengan melaksanakan *Business Continuity Management (BCM)* dan pengujian *Disaster Recovery Plan (DRP)* secara berkesinambungan. *Disaster recovery* merupakan langkah pencegahan untuk mengamankan semua sistem, aplikasi, dan perangkat IT dari bencana yang akan datang. *Disaster recovery* dilakukan sebagai langkah pencegahan atas kejadian pada masa depan yang tidak bisa diprediksi. Berkaitan dengan hal tersebut, Bank telah menerapkan berbagai langkah mitigasinya sebagai berikut:

1. *Melakukan simulasi Disaster Recovery (DR Drill) secara konsisten satu tahun satu kali untuk setiap sistem aplikasi kritikal.*
2. *Melakukan capacity review berkala terhadap kapasitas infrastruktur yang berkaitan dengan sistem aplikasi kritikal.*
3. *Melakukan real time monitoring dengan jangkauan waktu dua puluh empat jam dalam tujuh hari (24/7) dan penerapan alert system terhadap sistem aplikasi yang berhubungan langsung dengan layanan nasabah sesuai dengan ketentuan alert threshold.*

Identifikasi dan Pengelolaan Risiko Utama yang Dilaporkan pada Direksi

Divisi TI Bank Sahabat Sampoerna telah membuat, mengidentifikasi, mengelola dan melapor secara periodik terkait risiko teknologi informasi kepada direktur yang membawahi bidang TI. Selain itu, kajian tersebut juga telah dilaporkan ke Divisi Manajemen Risiko dan komite terkait untuk dilakukan penelaahan lebih lanjut.

1. *Security Operation Center - SOC 24/7.*
2. *Annual Pentest.*
3. *Security Awareness Program for all employees and IT Service Providers.*
4. *Increasing Anti Malware to Endpoint Detection and Response - EDR.*
5. *Increasing asset management capabilities (Asset Management).*
6. *Increasing Identity and Access Management capabilities.*
7. *Increasing Network and Security Device capabilities.*
8. *Implementation of data leakage prevention (Data Loss Prevention - DLP).*
9. *Continuous Cyber Security Roadmap Program.*
10. *Formation of a cyber incident response team.*

Disaster Recovery

Bank Sahabat Sampoerna strives to overcome various potential risks and secure operational continuity by implementing Business Continuity Management (BCM) and continuous testing of the Disaster Recovery Plan (DRP). Disaster recovery is a preventive measure to secure all IT systems, applications, and devices from future disasters. Disaster recovery is carried out as a preventive measure against future events that cannot be predicted. In this regard, the Bank has implemented various mitigation steps as follows:

1. *Conducting Disaster Recovery (DR Drill) simulations consistently once a year for each critical application system.*
2. *Conducting periodic capacity reviews of infrastructure capacity related to critical application systems.*
3. *Conducting real-time monitoring with a time span of twenty-four hours in seven days (24/7) and implementing an alert system for application systems that are directly related to customer services in accordance with the provisions of the alert threshold.*

Identification and Management of Key Risks Reported to the Board of Directors

Bank Sahabat Sampoerna's IT Division has created, identified, managed and periodically reported information technology risks to the director in charge of IT. In addition, the study has also been reported to the Risk Management Division and related committees for further review.

Sertifikasi yang Dimiliki Personel TI Perusahaan

Bank berupaya untuk memastikan seluruh personel TI telah memiliki kualifikasi dan kompetensi yang dibutuhkan, di antaranya dengan mengikuti berbagai program sertifikasi terkait TI. Adapun sertifikasi yang dimiliki personel TI Bank hingga 31 Desember 2024 adalah sebagai berikut:

No.	Sertifikasi <i>Certification</i>	Total (orang) <i>Total (Persons)</i>
1.	Sertifikasi Manajemen Risiko Jenjang 4 <i>Risk Management Certification Level 4</i>	25
2.	Sertifikasi Manajemen Risiko Jenjang 5 <i>Risk Management Certification Level 5</i>	7
3.	Sertifikasi Manajemen Risiko Jenjang 7 <i>Risk Management Certification Level 7</i>	1
4.	Certified Ethical Hacking (CEH Version 13) <i>Certified Ethical Hacking (CEH Version 13)</i>	1

Certifications Held by the Company's IT Personnel

The Bank strives to ensure that all IT personnel have the required qualifications and competencies, including by participating in various IT-related certification programs. The certifications held by the Bank's IT personnel until December 31, 2024 are as follows:

Rencana Pengembangan TI ke Depan

Pemanfaatan TI yang berorientasi pada Rencana Strategis TI menjadi bagian penting untuk diwujudkan melalui pengembangan TI di tahun 2025. Hal ini mencakup pengembangan fitur, pemenuhan kapasitas, skalabilitas, dan fleksibilitas sistem TI, serta implementasi pengamanan TI yang komprehensif. Rencana pengembangan TI untuk tahun 2025 yang telah disusun diharapkan dapat memenuhi kebutuhan usaha. Bank telah menetapkan rencana pengembangan TI ke depan yang di antaranya:

1. *Digital Onboarding* untuk nasabah korporasi
2. *Open Banking* dengan nasabah korporasi
3. Pengembangan fitur untuk layanan *Consumer Open Banking*
4. Pengembangan fitur untuk layanan *Sampoerna Mobile Banking*
5. Pengembangan fitur untuk layanan *Internet Banking*
6. Pengembangan fitur untuk layanan *Card Management System*
7. Pengembangan fitur untuk layanan QRIS
8. Pengembangan fitur *Buy Now Pay Later (BNPL)*

Future IT Development Plans

The use of IT oriented towards the IT Strategic Plan is an important part to be realized through IT development in 2025. This includes feature development, capacity fulfillment, scalability, and flexibility of IT systems, as well as the implementation of comprehensive IT security. The IT development plan for 2025 that has been prepared is expected to meet business needs. The Bank has set a future IT development plan which includes:

1. *Digital Onboarding* for corporate customers
2. *Open Banking* with corporate customers
3. *Feature development* for *Consumer Open Banking* services
4. *Feature development* for *Sampoerna Mobile Banking* services
5. *Feature development* for *Internet Banking* services
6. *Feature development* for *Card Management System* services
7. *Feature development* for *QRIS* services
8. *Buy Now Pay Later (BNPL)* feature development

Pengendalian Gratifikasi

Gratification Control

Kebijakan terkait Gratifikasi

Pengendalian gratifikasi merupakan serangkaian kegiatan yang bertujuan untuk mengendalikan penerimaan gratifikasi dengan meningkatkan pemahaman dan kesadaran pelaporan gratifikasi secara transparan dan akuntabel berpedoman pada peraturan dan perundangan-undangan yang berlaku. Bank Sahabat Sampoerna berkomitmen untuk menerapkan pengendalian gratifikasi secara konsisten dan menyeluruh dengan berpedoman pada memo yang ditetapkan Direksi No. 09/006/MI/Sisdur/II/2015 tanggal 27 Februari 2015 tentang Ketentuan Penerimaan Hadiah dari Pihak Ketiga. Di sisi lain, Bank membentuk pengecualian, jika dalam kondisi tertentu penolakan dianggap dapat menimbulkan penghinaan, maka pihak yang bersangkutan boleh menerima pemberian/ imbalan dari pihak ketiga dengan syarat wajib dilaporkan kepada pimpinan Bank setempat atau kepada Pejabat Eksekutif dengan mengisi Formulir Deklarasi Penerimaan Hadiah.

Laporan Penerimaan Hadiah dari Pihak Ketiga

Sepanjang tahun 2024, Bank telah mencatat informasi terkait penerimaan hadiah dari pihak ketiga yang disajikan pada tabel berikut:

Divisi/Unit Kerja/ Jabatan <i>Division/Work Unit/ Position</i>	Tanggal Menerima Hadiah <i>Gift Receipt Date</i>	Dalam Rangka <i>Occasion</i>	Jenis Hadiah <i>Type of Gift</i>	Tanggal Pelaporan Satuan Kerja Kepatuhan <i>Compliance Division's Reporting Date</i>	Peruntukan Designation
BPD Fintech, Partnership & Digital Initiative	12 Desember 2023 <i>12 December 2023</i>	Hari Raya Natal <i>Christmas Day</i>	Hampers Christmas	02 Januari 2025	Dibagikan kepada team Compliance <i>Shared with Compliance team</i>
GA & Procurement	12 Februari 2024 <i>12 February 2024</i>	Hari Raya Imlek <i>Chinese New Year</i>	Hampers Imlek	12 Februari 2024	Dibagikan kepada team GA & Procurement <i>Shared with GA & Procurement team</i>
Corporate Legal	26 Februari 2024 <i>26 February 2024</i>	Menjelang Ramadhan <i>Welcoming Ramadhan</i>	Parcel Makanan	26 Februari 2024	Dibagikan kepada team <i>Shared with team</i>
SQ & CC/COS	03 April 2024 <i>3 April 2024</i>	Hari Raya Idul Fitri <i>Eid Fitr Day</i>	Gift Idul Fitri	03 April 2024	Dibagi untuk acara preloved <i>Shared for preloved event</i>

Gratification-related Policies

Gratification control is a series of activities aimed at controlling the acceptance of gratuities by increasing understanding and awareness of transparent and accountable gratuity reporting based on applicable regulations and laws. Bank Sahabat Sampoerna is committed to implementing consistent and comprehensive gratuity control based on the memo stipulated by the Board of Directors No. 09/006/MI/Sisdur/II/2015 dated February 27, 2015 concerning Provisions on Accepting Gifts from Third Parties. On the other hand, the Bank forms an exception, if under certain conditions the rejection is considered to be insulting, then the party concerned may accept gifts/ rewards from third parties on the condition that it must be reported to the local Bank management or to the Executive Officer by filling out the Gift Acceptance Declaration Form.

Report on the Receipt of Gifts from Third Parties

Throughout 2024, the Bank has recorded information related to the receipt of gifts from third parties which is presented in the following table:

Divisi/Unit Kerja/ Jabatan <i>Division/Work Unit/ Position</i>	Tanggal Menerima Hadiah <i>Gift Receipt Date</i>	Dalam Rangka <i>Occasion</i>	Jenis Hadiah <i>Type of Gift</i>	Tanggal Pelaporan Satuan Kerja Kepatuhan <i>Compliance Division's Reporting Date</i>	<i>Peruntukan Designation</i>
SQ & CC/COS	03 April 2024 <i>3 April 2024</i>	Hari Raya Idul Fitri <i>Eid Fitr Day</i>	Gift Idul Fitri	03 April 2024	Dibagikan kepada team <i>Shared with team</i>
IT Infrastructure & Security	11 November 2024 <i>11 November 2024</i>	Gift <i>Gift</i>	Snack	11 November 2024	Dibagikan untuk karyawan IT Infrastructure & Security <i>Shared for IT Infrastructure & Security employees</i>
HC	13 Desember 2024 <i>13 December 2024</i>	Hari Raya Natal <i>Christmas Day</i>	Hampers Natal <i>(Reed Diffuser & Tea Set)</i>	20 Desember 2024	Reed Diffuser: Agar digunakan sebagai pengharum ruang kerja/ruang meeting Tea Set : 1. Untuk diletakkan di Pantry, agar dapat digunakan bersama; atau 2. Untuk digunakan sebagai hadiah pada acara Sahabat Menyapa <i>Reed Diffuser: To be used as a fragrance for workspace/meeting room</i> <i>Tea Set: 1. To be placed in the Pantry, so that it can be used together; or 2. To be used as a gift at the Sahabat Menyapa event</i>

Komitmen terhadap Anti Korupsi

Commitment to Anti-Corruption

Kebijakan terhadap Anti Korupsi

Dewan Komisaris, Direksi, serta seluruh Insan Bank senantiasa menjunjung tinggi persaingan yang *fair*, nilai sportifitas dan profesionalisme, serta prinsip-prinsip GCG. Bank juga berkomitmen untuk menciptakan iklim usaha yang sehat, menghindari tindakan, perilaku ataupun perbuatan-perbuatan yang dapat menimbulkan konflik kepentingan, Korupsi, Kolusi dan Nepotisme (KKN) serta selalu mengutamakan kepentingan Bank di atas kepentingan pribadi, keluarga, kelompok ataupun golongan. Bank juga senantiasa memperhatikan kebijakan tentang anti korupsi seperti yang tertulis dalam Undang-Undang No. 20 Tahun 2001 tentang Perubahan atas Undang-Undang No. 31 Tahun 1999 tentang Pemberantasan Tindak Pidana Korupsi.

Sosialisasi terhadap Anti Korupsi di Perusahaan

Prinsip-prinsip dari kebijakan anti suap dan korupsi telah diatur dalam Kode Etik Bank yang berisi nilai-nilai yang dianut oleh Bank serta menetapkan standar perilaku seluruh Insan Bank dan sebagai salah satu bentuk pernyataan prinsip dan komitmen Bank dalam mendukung praktik anti suap dan korupsi yang dikategorikan juga sebagai tindakan kecurangan. Penerapan Kode Etik ini juga bertujuan untuk melindungi Bank dan seluruh karyawan dari dampak negatif seperti risiko hukum, kerugian finansial, reputasi negatif dan untuk menjaga kepercayaan seluruh pemegang saham, pemangku kepentingan, dan masyarakat luas.

Policy on Anti-Corruption

The Board of Commissioners, Directors, and all Bank Personnel always uphold fair competition, values of sportsmanship and professionalism, and principles of GCG. The Bank is also committed to creating a healthy business climate, avoiding actions, behaviors or deeds that can cause conflicts of interest, Corruption, Collusion and Nepotism (KKN) and always prioritizing the interests of the Bank above personal, family, group or class interests. The Bank also always pays attention to the policy on anti-corruption as stated in Law No. 20 of 2001 concerning Amendments to Law No. 31 of 1999 concerning the Eradication of Criminal Acts of Corruption.

Information Dissemination on Anti-Corruption in the Company

The principles of the anti-bribery and corruption policy have been regulated in the Bank's Code of Ethics which contains the values adopted by the Bank and establishes standards of behavior for all Bank Personnel and as a form of statement of the Bank's principles and commitment in supporting anti-bribery and corruption practices which are also categorized as fraudulent acts. The implementation of this Code of Ethics also aims to protect the Bank and all employees from negative impacts such as legal risks, financial losses, negative reputation and to maintain the trust of all shareholders, stakeholders, and the wider community.

Perkara Penting dan Sanksi Administratif

Significant Cases and Administrative Sanctions

Perkara Penting yang Dihadapi oleh Bank, Dewan Komisaris, dan Direksi yang Menjabat Tahun 2024

Important Cases Faced by Banks, Board of Commissioners, and Directors In-Office in 2024

Berikut disampaikan perkara hukum yang dihadapi oleh Bank sepanjang tahun 2024.

The following is a presentation of the legal cases faced by the Bank throughout 2024.

Permasalahan Hukum <i>Legal Cases</i>	Total Kasus <i>Total Cases</i>	
	Perdata <i>Civil</i>	Pidana <i>Criminal</i>
Telah mendapat putusan yang mempunyai kekuatan hukum tetap <i>Has obtain a decision that has permanent legal force</i>	1	1
Dalam proses penyelesaian <i>In settlement process</i>	18	17
Total <i>Total</i>	19	18

Pokok Perkara <i>Case Profile</i>	Status Penyelesaian <i>Settlement Status</i>	Pengaruh terhadap Kondisi Bank <i>Impact on Bank Condition</i>	Risiko yang Dihadapi <i>Risk Faced</i>	Sanksi Administrasi yang Diterima <i>Administrative Sanctions Imposed</i>
KASUS PERDATA CIVIL CASES				
Perkara Gugatan dari Nasabah Joanes Barlian Swandjaja <i>Lawsuit from Customer Joanes Barlian Swandjaja</i>	Perkara telah diputus di Tingkat Pengadilan Negeri dengan amarnya menyatakan gugatan penggugat tidak dapat diterima. Tidak terdapat informasi adanya upaya Banding atas perkara ini. <i>The case was decided at the District Court level with the verdict that the plaintiff's claim was inadmissible.</i> <i>There is no information regarding an appeal being filed in this case.</i>	Nihil <i>None</i>	Adanya tuntutan dari Debitur <i>Claim from Debtor</i>	Nihil <i>None</i>
Perkara Gugatan dari Nasabah Ahmad Kurniawan <i>Lawsuit from Customer Ahmad Kurniawan</i>	Saat ini sedang dalam pemeriksaan dalam tahap Banding. <i>Currently under appeal process.</i>	Nihil <i>None</i>	Adanya tuntutan dari Debitur <i>Claim from Debtor</i>	Nihil <i>None</i>
Perkara Gugatan atas nama Hendra Thiemailattu terkait Nasabah Dharma Wira Wijaya <i>Lawsuit filed by Hendra Thiemailattu regarding Customer Dharma Wira Wijaya</i>	Saat ini sedang dalam pemeriksaan dalam tahap Banding. <i>Currently under appeal process.</i>	Nihil <i>None</i>	Adanya tuntutan dari Pihak Ketiga <i>Claim from Third Party</i>	Nihil <i>None</i>
Perkara Gugatan dari Nasabah Idlinsah <i>Lawsuit from Customer Idlinsah</i>	Saat ini sedang dalam pemeriksaan dalam tahap Banding. <i>Currently under appeal process.</i>	Nihil <i>None</i>	Adanya tuntutan dari Debitur <i>Claim from Debtor</i>	Nihil <i>None</i>

Pokok Perkara <i>Case Profile</i>	Status Penyelesaian <i>Settlement Status</i>	Pengaruh terhadap Kondisi Bank <i>Impact on Bank Condition</i>	Risiko yang Dihadapi <i>Risk Faced</i>	Sanksi Administrasi yang Diterima <i>Administrative Sanctions Imposed</i>
Perkara Gugatan dari Nasabah Hj Hasna Nurdin <i>Lawsuit from Customer Hj Hasna Nurdin</i>	Saat ini sedang dalam pemeriksaan dalam tahap Banding. <i>Currently under appeal process.</i>	Nihil <i>None</i>	Adanya tuntutan dari Debitur <i>Claim from Debtor</i>	Nihil <i>None</i>
Perkara Gugatan dari Nasabah Maskur <i>Lawsuit from Customer Maskur</i>	Perkara masih dalam tahap persidangan di Pengadilan Negeri. <i>Still in the trial stage at District Court.</i>	Nihil <i>None</i>	Adanya tuntutan dari Debitur <i>Claim from Debtor</i>	Nihil <i>None</i>
Perkara Gugatan dari Pihak Ketiga (Non Nasabah) atas nama Sabaruddin <i>Lawsuit from Third Party (Non-Customer) named Sabaruddin</i>	Perkara masih dalam tahap persidangan di Pengadilan Negeri. <i>Still in the trial stage at District Court.</i>	Nihil <i>None</i>	Adanya tuntutan dari Pihak Ketiga <i>Claim from Third Party</i>	
Perkara Gugatan dari Nasabah PT EMKA Beschlagteile Pacific <i>Lawsuit from Customer PT EMKA Beschlagteile Pacific</i>	Perkara masih dalam tahap persidangan di Pengadilan Negeri. <i>Still in the trial stage at District Court.</i>	Nihil <i>None</i>	Adanya tuntutan dari Debitur <i>Claim from Debtor</i>	Nihil <i>None</i>
Perkara Gugatan atas nama Irvan Surya Lesmana terkait Nasabah PT Irma Mojang Wisata <i>Lawsuit by Irvan Surya Lesmana regarding Customer PT Irma Mojang Wisata</i>	Perkara masih dalam tahap persidangan di Pengadilan Negeri. <i>Still in the trial stage at District Court.</i>	Nihil <i>None</i>	Adanya tuntutan dari Pihak Ketiga <i>Claim from Third Party</i>	Nihil <i>None</i>
Perkara Gugatan atas nama Indrayaza terkait Nasabah Hj Hasna Nurdin <i>Lawsuit by Indrayaza regarding Customer Hj Hasna Nurdin</i>	Perkara masih dalam tahap persidangan di Pengadilan Negeri. <i>Still in the trial stage at District Court.</i>	Nihil <i>None</i>	Adanya tuntutan dari Debitur <i>Claim from Debtor</i>	Nihil <i>None</i>
Perkara Gugatan atas nama Faradillah Syarah terkait Nasabah Ahmad Kurniawan <i>Lawsuit by Faradillah Syarah regarding Customer Ahmad Kurniawan</i>	Perkara masih dalam tahap persidangan di Pengadilan Negeri. <i>Still in the trial stage at District Court.</i>	Nihil <i>None</i>	Adanya tuntutan dari Pihak Ketiga <i>Claim from Third Party</i>	Nihil <i>None</i>
Perkara Gugatan atas nama Moel Santoso Sayono terkait Nasabah Endang Irawaty <i>Lawsuit by Moel Santoso Sayono regarding Customer Endang Irawaty</i>	Perkara masih dalam tahap persidangan di Pengadilan Negeri. <i>Still in the trial stage at District Court.</i>	Nihil <i>None</i>	Adanya tuntutan dari Pihak Ketiga <i>Claim from Third Party</i>	Nihil <i>None</i>
Perkara Gugatan atas nama Ardy Putra Sulimin terkait Nasabah Andereas <i>Lawsuit by Ardy Putra Sulimin regarding Customer Andereas</i>	Perkara masih dalam tahap persidangan di Pengadilan Negeri. <i>Still in the trial stage at District Court.</i>	Nihil <i>None</i>	Adanya tuntutan dari Pihak Ketiga <i>Claim from Third Party</i>	Nihil <i>None</i>
Perkara Gugatan atas nama Ardy Putra Sulimin terkait Nasabah Soeryawan <i>Lawsuit by Ardy Putra Sulimin regarding Customer Soeryawan</i>	Perkara masih dalam tahap persidangan di Pengadilan Negeri. <i>Still in the trial stage at District Court.</i>	Nihil <i>None</i>	Adanya tuntutan dari Pihak Ketiga <i>Claim from Third Party</i>	Nihil <i>None</i>
Perkara Gugatan dari Nasabah Robert Sipayung <i>Lawsuit from Customer Robert Sipayung</i>	Perkara masih dalam tahap persidangan di Pengadilan Negeri. <i>Still in the trial stage at District Court.</i>	Nihil <i>None</i>	Adanya tuntutan dari Debitur <i>Claim from Debtor</i>	Nihil <i>None</i>
Perkara Gugatan dari Nasabah Euis Hodijah <i>Lawsuit from Customer Euis Hodijah</i>	Perkara masih dalam tahap persidangan di Pengadilan Negeri. <i>Still in the trial stage at District Court.</i>	Nihil <i>None</i>	Adanya tuntutan dari Debitur <i>Claim from Debtor</i>	Nihil <i>None</i>

Pokok Perkara <i>Case Profile</i>	Status Penyelesaian <i>Settlement Status</i>	Pengaruh terhadap Kondisi Bank <i>Impact on Bank Condition</i>	Risiko yang Dihadapi <i>Risk Faced</i>	Sanksi Administrasi yang Diterima <i>Administrative Sanctions Imposed</i>
Perkara PKPU terkait Nasabah PT EMKA Beschlagteile Pacific <i>PKPU Case regarding Customer PT EMKA Beschlagteile Pacific</i>	Sedang dalam proses pembahasan proposal perdamaian <i>In the process of discussing peace proposal.</i>	Nihil <i>None</i>	Adanya permohonan PKPU/Pailit terhadap Debitur <i>PKPU/Bankruptcy petition against Debtor</i>	Nihil <i>None</i>
Perkara Gugatan atas nama Ibrahim terkait Nasabah PT Wlja Malla Utama <i>Lawsuit by Ibrahim regarding Customer PT Wlja Malla Utama</i>	Perkara masih dalam tahap persidangan di Pengadilan Negeri. <i>Still in the trial stage at District Court.</i>	Nihil <i>None</i>	Adanya tuntutan dari Debitur/Penjamin <i>Claim from Debtor/Guarantor</i>	Nihil <i>None</i>
Perkara Perkara PKPU terkait Nasabah PT Pusaka Bumi Transportasi <i>PKPU Case regarding Customer PT Pusaka Bumi Transportasi</i>	Sedang dalam proses verifikasi tagihan. <i>In the process of claim verification.</i>	Nihil <i>None</i>	Adanya permohonan PKPU/Pailit terhadap Debitur <i>PKPU/Bankruptcy petition against Debtor</i>	Nihil <i>None</i>
KASUS PIDANA CRIMINAL CASES				
Panggilan Saksi dari Polda Sumatra Selatan, yang berkaitan dengan Nasabah Freddy Didi <i>Witness Summon from South Sumatra Police, related to Customer Freddy Didi</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Polres Jakarta Pusat, yang berkaitan dengan Nasabah Isidorus Iswardjo <i>Witness Summon from Central Jakarta Police, related to Customer Isidorus Iswardjo</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Polrestabes Palembang, yang berkaitan dengan Nasabah Martalius <i>Witness Summon from Palembang Police, related to Customer Martalius</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Polrestabes Bandung, yang berkaitan dengan Nasabah PT EMKA Beschlagteile Pacific <i>Witness Summon from Bandung Police, related to Customer PT EMKA Beschlagteile Pacific</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Laporan Pidana ke Polda Metro Jaya, yang berkaitan dengan Penjamin Rivan Putera Yuwono <i>Criminal Report to Metro Jaya Police, related to Guarantor Rivan Putera Yuwono</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>

Pokok Perkara <i>Case Profile</i>	Status Penyelesaian <i>Settlement Status</i>	Pengaruh terhadap Kondisi Bank <i>Impact on Bank Condition</i>	Risiko yang Dihadapi <i>Risk Faced</i>	Sanksi Administrasi yang Diterima <i>Administrative Sanctions Imposed</i>
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Sejahtera Sama Kita <i>Witness Summon from Metro Jaya Police, related to Customer PT Sejahtera Sama Kita</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Laporan Pidana ke Polsek Sukarami, yang berkaitan dengan Pihak Ketiga atas nama Suleman <i>Criminal Report to Sukarami Police, related to Third Party Suleman</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Inklusi Keuangan Nusantara <i>Witness Summon from Metro Jaya Police, related to Customer PT Inklusi Keuangan Nusantara</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah Elias Thomas <i>Witness Summon from Metro Jaya Police, related to Customer Elias Thomas</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Polda Jawa Barat, yang berkaitan dengan Nasabah Moladin <i>Witness Summon from West Java Police, related to Customer Moladin</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Polres Labuhanbatu, yang berkaitan dengan Nasabah Idlinsah <i>Witness Summon from Labuhanbatu Police, related to Customer Idlinsah</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Metro Jaya, yang berkaitan dengan Nasabah Rachmawati Muyiddin <i>Witness Summon from Metro Jaya Police, related to Customer Rachmawati Muyiddin</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Polres Sukabumi, yang berkaitan dengan Pihak Ketiga Yendriani (Non Nasabah) <i>Witness Summon from Sukabumi Police, related to Third Party Yendriani (Non-Customer)</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Polsek Sukarami, yang berkaitan dengan Nasabah Belia Puspitania <i>Witness Summon from Sukarami Police, related to Customer Belia Puspitania</i>	Perkara telah dicabut <i>Case withdrawn</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>

Pokok Perkara <i>Case Profile</i>	Status Penyelesaian <i>Settlement Status</i>	Pengaruh terhadap Kondisi Bank <i>Impact on Bank Condition</i>	Risiko yang Dihadapi <i>Risk Faced</i>	Sanksi Administrasi yang Diterima <i>Administrative Sanctions Imposed</i>
Panggilan Saksi dari Polda Jawa Barat, yang berkaitan dengan Nasabah PT EMKA Beschlagteile Pacific <i>Witness Summon from West Java Police, related to Customer PT EMKA Beschlagteile Pacific</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah A. Sucipto <i>Witness Summon from Metro Jaya Police, related to Customer A. Sucipto</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Polrestabes Surabaya, yang berkaitan dengan Nasabah CV Tiga Bintang Manunggal <i>Witness Summon from Surabaya Police, related to Customer CV Tiga Bintang Manunggal</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>
Panggilan Saksi dari Polres Metro Bekasi, yang berkaitan dengan Nasabah Yohanes Ardiono <i>Witness Summon from Bekasi Police, related to Customer Yohanes Ardiono</i>	Masih dalam proses pemeriksaan di kepolisian <i>Under police investigation</i>	Nihil <i>None</i>	Adanya panggilan dari kepolisian terhadap karyawan Bank <i>Police summon for Bank employee</i>	Nihil <i>None</i>

Sanksi Administratif

Administrative Sanctions

Pada tahun 2024, terdapat sanksi administratif yang diterima Bank dari Regulator dengan rincian sebagai berikut:

In 2024, there were administrative sanctions received by the Bank from the Regulator with the following details:

Tanggal <i>Date</i>	Keterangan <i>Description</i>	Kerugian Aktual (Rp) <i>Actual Loss (Rp)</i>
13 Februari 2024 <i>13 February 2024</i>	Sanksi Denda SLIK (Koreksi Laporan) <i>SLIK Fine Sanctions (Report Correction)</i>	250.000
27 Februari 2024 <i>27 February 2024</i>	Sanksi Denda SLIK (Hasil Laporan Hasil Pemeriksaan Kinerja OJK) <i>SLIK Fine Sanctions (Results of OJK Performance Audit Report)</i>	50.000.000
13 Mei 2024 <i>13 May 2024</i>	Sanksi Kewajiban membayar atas Pemantauan langsung kepatuhan PT Bank Sahabat Sampoerna sebagai Peserta Sistem Pembayaran BI dan Financial Market Infrastructure (SP dan FMI BI) serta Kantor Pengelola Daftar Hitam Nasional (KPDHN) <i>Sanctions of Obligation to Pay for Direct Monitoring of PT Bank Sahabat Sampoerna's Compliance as a Participant of the BI Payment System and Financial Market Infrastructure (SP and FMI BI) and the National Blacklist Management Office (KPDHN)</i>	300.000
10 Juni 2024 <i>10 June 2024</i>	Hasil Pemeriksaan Fullscope terhadap Penyedia Jasa Pembayaran (PJP) PT Bank Sahabat Sampoerna <i>Fullscope Examination Results of Payment Service Providers (PJP) PT Bank Sahabat Sampoerna</i>	30.000.000
10 Juli 2024 <i>10 July 2024</i>	Sanksi OJK – Denda Keterlambatan SLIK <i>OJK Sanctions – SLIK Late Fines</i>	250.000
24 Juli 2024 <i>24 July 2024</i>	Denda Tindak Lanjut Hasil Pemantauan Langsung <i>Follow-up Fines for Direct Monitoring Results</i>	300.000
31 Juli 2024 <i>31 July 2024</i>	Pembebanan Sanksi Kewajiban Membayar atas Transaksi Credit Transfer Request (CTR) Kode Error U 194 <i>Imposition of Obligation to Pay Sanctions for Credit Transfer Request (CTR) Transactions Error Code U 194</i>	5.000.000

Tanggal Date	Keterangan Description	Kerugian Aktual (Rp) Actual Loss (Rp)
1 Agustus 2024 1 August 2024	Pengenaan Sanksi Kewajiban Membayar Atas Koreksi di Luar Batas Waktu Penyampaian Laporan Bulanan Bank Umum Terintegrasi (LBUT) <i>Imposition of Sanctions for Obligations to Pay for Corrections Outside the Submission Deadline for Integrated Commercial Bank Monthly Reports (LBUT)</i>	50.000
13 Agustus 2024 13 August 2024	Denda Keterlambatan Pembayaran Sanksi No. : S-194/PB.32/2024 <i>Late Payment Fines for Sanctions No.: S-194/PB.32/2024</i>	5.000
13 Agustus 2024 13 August 2024	Mekanisme Pembayaran Sanksi Atas Rencana Pelaksanaan Proyek Uji Coba Terbatas Produk Sampoerna Mobile Time Deposit - PT Bank Sahabat Sampoerna <i>Sanction Payment Mechanism for the Implementation Plan for the Limited Trial Project of the Sampoerna Mobile Time Deposit Product - PT Bank Sahabat Sampoerna</i>	100.000.000
3 September 2024 3 September 2024	Sanksi Administratif - Sentralisasi (Biaya Proses Sanksi Transaksi Individu) <i>Administrative Sanctions - Centralization (Individual Transaction Sanction Processing Fees)</i>	200.000
19 September 2024 19 September 2024	Sanksi Pelanggaran GWM GWM Violation Sanctions	508
9 Desember 2024 9 December 2024	Pengenaan Sanksi Kewajiban Membayar atas Koreksi di Luar Batas Waktu Penyampaian Laporan Bulanan Bank Umum Terintegrasi (LBUT) - Penyampaian Koreksi Kelompok Informasi Keuangan Bulanan di Luar Batas Penyampaian Laporan Periode data Agustus dan September 2024 <i>Imposition of Payment Sanctions for Corrections Outside the Deadline for Submission of Integrated Commercial Bank Monthly Reports (LBUT) - Submission of Corrections to Groups of Monthly Financial Information Outside the Deadline for Submission of Reports for the Data Period of August and September 2024</i>	12.150.000
9 Desember 2024 9 December 2024	Pengenaan Sanksi Kewajiban Membayar atas Hasil Pengawasan dan/atau Pemeriksaan OJK terkait Laporan Bank Umum Terintegrasi (LBUT) <i>Imposition of Payment Sanctions for the Results of OJK Supervision and/or Examination related to Integrated Commercial Bank Reports (LBUT)</i>	400.000
19 Desember 2024 19 December 2024	Pengenaan Sanksi Kewajiban Membayar atas Koreksi di Luar Batas Waktu Penyampaian Laporan Bulanan Bank Umum Terintegrasi (LBUT) - Penyampaian Koreksi Kelompok Informasi Keuangan Bulanan di Luar Batas Penyampaian Laporan Periode data Oktober 2024 <i>Imposition of Payment Sanctions for Corrections Outside the Deadline for Submission of Integrated Commercial Bank Monthly Reports (LBUT) - Submission of Corrections to Groups of Monthly Financial Information Outside the Deadline for Submission of Reports for the Data Period of October 2024</i>	5.500.000
24 Desember 2024 24 December 2024	Sanksi Administratif atas Laporan Hasil Pemeriksaan Bank posisi 31 Agustus 2024 <i>Administrative Sanctions for Bank Examination Results Reports as of August 31, 2024</i>	304.550.000
Jumlah Denda Total Fine		508.955.508

Sistem Pelaporan Pelanggaran

Whistleblowing System

Kebijakan WBS

Sistem pelaporan pelanggaran (*whistleblowing system/ WBS*) merupakan sebuah mekanisme atau prosedur yang disediakan oleh Bank untuk melaporkan tindakan pelanggaran, baik perbuatan hukum, perbuatan tidak etis/tidak bermoral, atau perbuatan lainnya yang dapat mencemarkan dan merugikan organisasi ataupun pemangku kepentingan. Bank Sahabat Sampoerna menerapkan WBS secara masif terutama untuk menindaklanjuti pelanggaran terkait penerapan GCG dan *Code of Conduct*. Tujuan dari pembentuk sistem tersebut, yaitu:

1. Mencegah terjadinya penyimpangan;
2. Mengoptimalkan peran serta seluruh karyawan dan mitra usaha dalam mengungkapkan pelanggaran yang terjadi di lingkungan Bank;
3. Menciptakan lingkungan kerja yang kondusif; dan
4. Menjaga reputasi Bank Sahabat Sampoerna.

Prinsip Dasar Pelaporan Pelanggaran

Bank Sahabat Sampoerna menyediakan sistem pelaporan pelanggaran bagi seluruh pemangku kepentingan Bank. Pihak yang ingin menyampaikan pelanggaran harus dapat memberikan informasi dengan jelas mengenai jenis laporan, pihak yang terlibat, lokasi dan waktu pelanggaran, serta bukti pelanggaran yang terjadi. Selain itu, guna memudahkan proses identifikasi dan tindak lanjut, Bank meminta kepada pelapor untuk mengungkapkan data diri dan penyampaian laporan disertai dengan bukti nyata, tanpa adanya kepentingan pribadi.

Cara Penyampaian Laporan Pelanggaran

Laporan pelanggaran dapat disampaikan kepada Pengelola WBS melalui e-mail (ombudsman@banksampoerna.com) atau SMS ke nomor telepon seluler masing-masing anggota Komite Ombudsman.

Mekanisme Penyampaian Laporan Pelanggaran

Bank telah menyusun mekanisme penyampaian laporan pelanggaran yang diuraikan sebagai berikut.

WBS Policies

The Whistleblowing System (WBS) is a mechanism or procedure provided by the Bank to report any violations, whether legal actions, unethical/immoral actions, or other actions that may taint and harm the organization or stakeholders. Bank Sahabat Sampoerna is implementing WBS massively, in particular to follow up on violations related to the implementation of GCG and the Code of Conduct. The objectives of establishing the system are as follows:

1. *Prevent irregularities;*
2. *Optimize the participation of all employees and business partners in uncovering violations that occur within the Bank;*
3. *Create conducive working environment; and*
4. *Maintain Bank Sahabat Sampoerna's reputation.*

Basic Whistleblowing Principles

Bank Sahabat Sampoerna provides a whistleblowing system to report any form of violations for all Bank stakeholders. Any party wishes to report a violation must be able to provide clear information regarding the type of report, parties involved, location and time of the violation, as well as evidence of the violation occurred. Also, to facilitate the identification and follow-up process, the Bank asks the whistleblower to disclose personal data and submit the report with concrete evidence, without any personal interests.

How to Submit Whistleblowing Report

The whistleblowing report can be submitted to the WBS Manager via e-mail (ombudsman@banksampoerna.com) or SMS to the cell phone number of each member of Ombudsman Committee.

Mechanism of Whistleblowing Submission

The Bank has prepared the mechanism of whistleblowing submission as described below.

Pelapor <i>Whistleblower</i>	Komite Ombudsman <i>Ombudsman Committee</i>	Satuan Kerja Audit Internal <i>Internal Audit Division</i>	Komite Ombudsman <i>Ombudsman Committee</i>	Pengurus Unit Kerja Terlapor <i>Management of the Reported Division</i>
Pelapor menyampaikan laporannya beserta bukti kepada Komite Ombudsman. <i>The whistleblower submits the report along with evidence to the Ombudsman Committee.</i>	Komite Ombudsman Menyerahkan laporan beserta bukti kepada Satuan Kerja Audit Internal untuk dilakukan pemeriksaan. <i>The Ombudsman Committee submits the report along with evidence to the Internal Audit Division for inspection.</i>	Satuan Kerja Audit Internal kemudian menyampaikan hasil pemeriksaan kepada Komite Ombudsman. <i>The Internal Audit Division then submits the audit results to the Ombudsman Committee.</i>	Komite Ombudsman Memberikan rekomendasi kepada Pengurus Unit Kerja sesuai dengan hasil pemeriksaan Komite Ombudsman. <i>The Ombudsman Committee provides recommendations to the Management of the Reported Division in accordance with the Ombudsman Committee results.</i>	Pengurus unit kerja terlapor menindaklanjuti rekomendasi yang disampaikan oleh komite Ombudsman. <i>The management of the reported work unit follows up on the recommendations submitted by the Ombudsman committee.</i>

Perlindungan bagi Pelapor

Perlindungan bagi pelapor wajib diberikan oleh Bank agar pihak yang memberikan laporan merasa aman dan nyaman, serta terhindar dari tindakan diskriminasi pihak yang terlapor. Perlindungan tersebut diberikan dalam bentuk menjamin kerahasiaan identitas pelapor dan laporannya, serta pelapor berhak menerima perkembangan laporan beserta tindak lanjutnya. Selain itu, Bank senantiasa memastikan seluruh anggota Komite Ombudsman menjaga kerahasiaan laporan pelanggaran yang ditindaklanjuti dan tidak menyebarkan informasi terkait laporan tersebut, kecuali kepada pelapor atau pihak yang terkait dengan aduan.

Penanganan Pengaduan

Penanganan pengaduan pelanggaran dilakukan dengan objektif dan transparan oleh Komite Ombudsman. Adapun proses kerja dari penanganan laporan pelanggaran tersebut, yaitu Komite Ombudsman menerima laporan dan memeriksa kebenarannya. Hasil dari pemeriksaan Komite Ombudsman tersebut diserahkan kepada Satuan Kerja Audit Internal dan Direktorat Sumber Daya Manusia dalam bentuk rekomendasi. Apabila hasil dari pelanggaran tersebut bersifat fraud, maka akan ditindaklanjuti oleh Satuan Kerja Audit Internal. Namun, apabila pengaduan yang disampaikan bersifat hubungan kerja, maka ditindaklanjuti oleh Direktorat Sumber Daya Manusia.

Komite Ombudsman memberikan rekomendasi dalam format standar berupa:

1. Laporan penerimaan kontak sesuai kategori lingkup pengaduan/penyungkapan; dan
2. Laporan penyungkapan (*disclosure report*).

Laporan Pengaduan

Sepanjang tahun 2024, Bank telah menerima laporan pengaduan yang diungkapkan pada tabel berikut:

Protection for Whistleblower

The Bank must provide protection for whistleblower so that the party submitting the report feels safe and comfortable, and is free from any discriminatory actions from the reported party. This protection is provided in the form of ensuring the confidentiality of the identity of the whistleblower and the report, and the whistleblower entitled to receive progress on the report and its follow-up actions. Also, the Bank constantly ensures that all members of the Ombudsman Committee maintain the confidentiality of whistleblowing report being follow-up and do not disseminate information related to such report, except to the whistleblower or parties related to the complaint.

Complaint Handling

The complaint handling is conducted by the Ombudsman Committee objectively and transparently. The work process of the complaint handling is the Ombudsman Committee receives the report and examined its veracity. The examination results of the Ombudsman Committee then submitted to the Internal Audit Division and Human Resources Directorate in the form of recommendations. If the result of the violation is fraudulent, it will be followed up by the Internal Audit Division. However, if the complaint submitted is related to work relationship, it will be followed up by the Human Resources Directorate.

The Ombudsman Committee provided recommendation in a standard format in the form of:

1. *Contact acceptance reports in accordance with the scope of the complaint/disclosure category; and*
2. *Disclosure report.*

Complaint Report

Throughout 2024, the Bank has received complaint reports as disclosed in the following table:

Jumlah Pengaduan <i>Total Complaints</i>	Tindak Lanjut		
	Belum Diproses <i>Not Yet Processed</i>	Dalam Proses <i>In Settlement Process</i>	Selesai <i>Settled</i>
3.562	-	18	3.544

Sanksi atau Tindak Lanjut atas Pengaduan yang Selesai Diproses

Setiap laporan pengaduan yang diterima akan ditindaklanjuti oleh Satuan Kerja Audit Internal dengan transparan dan objektif. Selama tahun 2024, terdapat 20 karyawan yang dilaporkan melakukan pelanggaran dan terbukti sehingga dikenakan sanksi, yang dijelaskan pada tabel berikut.

Tahun <i>Year</i>	Surat Teguran <i>Reprimand Letter</i>	Surat Peringatan <i>Warning Letter</i>	SP 2 <i>Warning Letter 2</i>	SP 3 <i>Warning Letter 3</i>	PHK <i>Termination of Employment</i>	Total <i>Total</i>
2024	4	4	12	0	20	4
2023	3	8	2	0	13	3

Sanctions or Follow-Up on Settled Reports

Every complaint report received will be followed up by the Internal Audit Work Unit transparently and objectively. During 2024, there were 20 employees who were reported to have committed violations and were proven to have been subject to sanctions, which are explained in the following table.

Internal Fraud

Internal fraud yang terjadi di Bank dalam kurun waktu 2 (dua) tahun terakhir diungkapkan sebagai berikut:

Internal Fraud

Internal fraud that occurred at the Bank in the last 2 years is disclosed as follows:

Uraian <i>Description</i>	Jumlah Kasus yang Dilakukan oleh <i>Number of Cases by</i>					
	Anggota Dewan Komisaris dan Direksi <i>Members of the Board of Commissioners and Board of Directors</i>		Pegawai Tetap <i>Permanent Employee</i>		Pegawai Tidak Tetap <i>Non-Permanent Employee</i>	
	2024	2023	2024	2023	2024	2023
Total Fraud <i>Total Fraud</i>	Nihil <i>None</i>	Nihil <i>None</i>	2	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>
Telah Diselesaikan <i>Settled</i>	Nihil <i>None</i>	Nihil <i>None</i>	2	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>
Dalam Proses Penyelesaian Internal Bank <i>Under the Bank's Internal Settlement Process</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>
Belum Diupayakan Penyelesaian <i>Settlement has not been Sought</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>
Telah Ditindaklanjuti melalui Proses Hukum <i>Has been Followed-Up through Legal Process</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>

Penyediaan Dana kepada Pihak Terkait dan Dana Besar

Bank Sahabat Sampoerna memiliki mekanisme dan kebijakan mengenai penyediaan dana kepada pihak terkait dan kepada debitur dalam jumlah besar. Terkait hal tersebut, Bank mengedepankan prinsip kehati-hatian dengan melakukan peninjauan secara seksama dengan berpedoman pada kebijakan internal dan ketentuan Bank Indonesia aspek Batas Maksimum Pemberian Kredit (BMPK). Selain itu, penyediaan dana harus melalui persetujuan Komisaris Independen.

Pada tahun 2024, persentase penyediaan dana terbesar berada pada sektor rumah tangga, yang dilakukan sesuai dengan peraturan perundang-undangan yang berlaku, serta tidak terdapat pelampauan dan/atau pelanggaran. Informasi terkait penyediaan dana kepada pihak terkait dan besar di Bank selama tahun 2024 diuraikan sebagai berikut:

Provision of Fund to Related Party and Large Exposure

Bank Sahabat Sampoerna have the mechanisms and policies on provision of funds to related party and to debtors in large exposure. In relation to this, the Bank prioritizes the principle of prudence by carrying out a thorough review according to internal policies and Bank Indonesia regulations on Legal Lending Limit (BMPK) aspect. Also, the provision of funds must be approved by the Independent Commissioner.

In 2024, the largest percentage of provision of funds was to the household sector, which was carried out in accordance with applicable laws and regulations, and there were no exceedances and/or violations. Information related to the provision of funds to related and large parties in the Bank during 2024 is described as follows:

Penyediaan Dana <i>Provisions of Fund</i>	Total <i>Total</i>	
	Debitur <i>Debtor</i>	Nominal (dalam jutaan Rupiah) <i>Amount (in million Rupiah)</i>
Kepada Pihak Terkait <i>To Related Parties</i>	5	227.967
Kepada Debitur Inti <i>To Core Debtor</i>		
Individu <i>Individual</i>	5	1.590.809
Grup <i>Groups</i>	2	888.168

Pemberian Dana Kegiatan Sosial dan/atau Politik

Provisions of Fund for Social and/or Political Activities

Bank Sahabat Sampoerna memiliki tanggung jawab terhadap masalah sosial dan kemasyarakatan yang diwujudkan melalui program-program tanggung jawab sosial dan lingkungan. Kebijakan ini merupakan salah satu upaya untuk memberi dampak positif kepada khalayak luas untuk jangka panjang. Di samping itu, kebijakan internal Bank juga melarang adanya keterlibatan Bank, termasuk para karyawan, dalam kegiatan politik termasuk memberikan dana untuk kepentingan politik. Kebijakan ini diterapkan guna menjaga independensi dan profesionalisme Bank dan karyawan.

Bank Sahabat Sampoerna has a responsibility towards social and community issues which are realized through social and environmental responsibility programs. This policy is one of the efforts to provide a positive impact to the wider community for the long term. In addition, the Bank's internal policy also prohibits the involvement of the Bank, including employees, in political activities including providing funds for political interests. This policy is implemented to maintain the independence and professionalism of the Bank and its employees.

Kredit yang Direstrukturisasi

Restructured Loans

Kredit yang direstrukturisasi merupakan upaya perbaikan dari Bank untuk melakukan kegiatan perkreditan terhadap debitur yang mengalami kesulitan untuk membayar kreditnya. Penerapan kebijakan kredit yang direstrukturisasi ini berpedoman pada Peraturan Otoritas Jasa Keuangan No. 17/POJK.03/2021 yang merupakan Perubahan Kedua atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2020 tentang Stimulus Perekonomian Nasional sebagai Kebijakan *Countercyclical* Dampak Penyebaran Covid-19. Selama tahun 2024, Bank telah melakukan restrukturisasi kredit melalui perpanjangan dan penurunan suku bunga sebesar Rp2,87 triliun.

Restructured credit is an improvement effort from the Bank to carry out credit activities for debtors who are having difficulty paying their credit. The implementation of this restructured credit policy is guided by Financial Services Authority Regulation No. 17/POJK.03/2021 which is the Second Amendment to Financial Services Authority Regulation No. 11/POJK.03/2020 concerning National Economic Stimulus as a Countercyclical Policy for the Impact of the Spread of Covid-19. During 2024, the Bank has restructured credit through extensions and interest rate reductions of Rp2.87 trillion

Kebijakan Pencegahan Insider Trading

Insider Trading Prevention Policy

Sampai dengan 31 Desember 2024, Bank Sahabat Sampoerna belum memiliki kebijakan tertulis untuk mencegah terjadinya *insider trading* sehubungan dengan status Bank sebagai perusahaan tertutup. Namun demikian, Bank senantiasa memastikan bahwa seluruh karyawan dan pejabat Bank tidak memberikan informasi rahasia kepada karyawan atau pihak lain yang tidak memiliki kebutuhan bisnis.

As of 31 December 2024, Bank Sahabat Sampoerna does not yet have a written policy to prohibit insider trading due to Bank's position as a private business. However, the Bank always ensures that all Bank employees and officers do not provide confidential information to employees or other parties without legitimate business need.

Transaksi yang Mengandung Benturan Kepentingan

Transaction Containing Conflict of Interest

Bank berkomitmen untuk senantiasa meminimalisir adanya praktik-praktik yang bertolak belakang dengan praktik terbaik tata kelola, termasuk terhadap terjadinya transaksi yang mengandung benturan kepentingan. Hal tersebut ditujukan agar Bank dapat menghindari kerugian dan menjaga kredibilitas bisnis. Bank juga telah menerapkan kebijakan terkait pengelolaan pemberian kredit kepada pihak terkait dan nasabah besar.

The Bank is committed to continuously minimizing practices that are contrary to best practices of governance, including transactions that contain conflicts of interest. This is intended so that the Bank can avoid losses and maintain business credibility. In relation to this, the Bank is implementing policies on managing lending to related parties and large customers.

Informasi terkait transaksi yang mengandung benturan kepentingan pada Bank dalam waktu 3 (tiga) tahun terakhir diungkapkan sebagai berikut:

In the last 3 years, there was no transaction containing conflict of interest, as disclosed in the following table.

Tahun Year	Nama dan Jabatan Pihak yang Memiliki Benturan Kepentingan <i>Name and Position of Party Having Conflict of Interest</i>	Nama dan Jabatan Pengambilan Keputusan <i>Name and Position of Decision Maker</i>	Jenis Transaksi <i>Type of Transactions</i>	Nilai Transaksi (dalam jutaan Rupiah) <i>Transaction Value (in million Rupiah)</i>	Keterangan* <i>Description*</i>
2024	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>
2023	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>
2022	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>	Nihil <i>None</i>

*) Tidak sesuai sistem dan prosedur yang berlaku

Akses Informasi Access to Information

Keterbukaan Informasi Information Disclosure

Selama menjalankan bisnisnya, Bank Sahabat Sampoerna senantiasa menyediakan akses informasi kepada seluruh pemangku kepentingan yang sejalan dengan prinsip transparansi dalam tata kelola yang dijalankan oleh Bank. Seluruh pemangku kepentingan dapat melihat informasi yang dibutuhkan melalui kanal-kanal yang telah disediakan oleh Bank, antara lain:

During its business operations, Bank Sahabat Sampoerna always provides access to information to all stakeholders in line with the principle of transparency in governance carried out by the Bank. All stakeholders can view the information they need through channels provided by the Bank, including:

Divisi Komunikasi Korporasi dan Hubungan Investor Corporate Communications and Investor Relations Division

Sampoerna Strategic Square
North Tower, Mezzanine
Jl. Jenderal Sudirman Kav. 45-46
Jakarta 12930, Indonesia

Telepon /Phone : (021) 5795 1234, 5795 1515
Call Center : 15000 35
Website : www.banksampoerna.com
E-mail : info@banksampoerna.com
Faksimili / Fax : (021) 5795 0626
Twitter : @BankSampoerna
Instagram : @Banksampoerna
Facebook : Bank Sahabat Sampoerna
Youtube : Bank Sahabat Sampoerna

Selain itu, Bank menyediakan keterbukaan informasi kepada pemangku kepentingan, sebagai berikut.

In addition, the Bank provides information disclosure to stakeholders, as follows.

Bentuk Keterbukaan Informasi <i>Form of Information Disclosure</i>	2024	2023	2022
Iklan Publikasi Pengumuman <i>Announcement Publication Ad</i>	2	-	1
Iklan Publikasi Laporan Keuangan Kuartal <i>Quarterly Financial Statements Publication Ad</i>	1	-	-
Laporan Tahunan <i>Annual Report</i>	15	1	1
Siaran Pers <i>Press Conference</i>	1	12	10
Media Visit Virtual <i>Virtual Media Visit</i>	1	2	2
Media Gathering Virtual <i>Virtual Media Gathering</i>	2	9	8

Hubungan Investor

Sepanjang tahun 2024, Bank melaksanakan hubungan investor dengan melakukan kunjungan ke berbagai media dan beberapa instansi. Selain itu, komunikasi dilakukan dalam bentuk publikasi Laporan Keuangan secara berkala dan penyampaian respon atas pertanyaan yang diajukan oleh investor.

Investor Relations

In 2024, the Bank carried out investor relations by visiting various media and several institutions, including Kompas, Tribun News, and the Indonesia Banking School (IBS) campus. Communication is also conducted in the form of periodic publication of the Financial Statements and submission of responses to questions asked by the investors.

Materi Pengumuman <i>Announcement Material</i>	Tanggal <i>Date</i>	Media <i>Media</i>
Iklan Relokasi Cabang Puri Indah <i>Puri Indah Branch Relocation Advertisement</i>	24 April <i>April 24</i>	Harian Neraca
Iklan Relokasi Cabang Gading Serpong <i>Gading Serpong Branch Relocation Advertisement</i>	30 Mei <i>May 30</i>	Harian Neraca

Aktivitas Media Relations

Siaran Pers dan Liputan Pemberitaan

Sepanjang tahun 2024, Bank telah mempublikasikan sebanyak 15 siaran pers dalam bentuk transparansi informasi kepada masyarakat dan 369 liputan pemberitaan mengenai Bank Sahabat Sampoerna yang dipublikasikan di beberapa media sebagai berikut.

1. Siaran Pers / Press Release

No	Judul <i>Title</i>	Tanggal <i>Date</i>
1	Selenggarakan Sultan Dadakan Kaltim, Bank Sampoerna Ajak UMKM dan Masyarakat Untuk Mulai Manfaatkan Layanan Digital <i>Celebrating Sultan Dadakan Kaltim Event, Bank Sampoerna Invites MSMEs and the Community to Start Utilizing Digital Services</i>	27 Januari <i>January 27</i>
2	Kunjungi Nasabah di Kedoya, Bank Sampoerna Tegaskan Komitmen Pemberdayaan UMKM <i>Bank Sampoerna Visits Customers in Kedoya, Affirming Commitment to Empowering MSMEs</i>	29 Januari <i>January 29</i>
3	Hadirkan Sampoerna Fest 2024, Bank Sampoerna Ajak Masyarakat Capai Financial Goals <i>Presenting Sampoerna Fest 2024, Bank Sampoerna Invites the Community to Achieve Financial Goals</i>	15 Maret <i>March 15</i>
4	Turut Serta Dalam Pertumbuhan Ekonomi Nasional, Bank Sampoerna Bukukan Kinerja yang Baik <i>Participating in National Economic Growth, Bank Sampoerna Records Good Performance</i>	17 April <i>April 17</i>
5	Dukung Pertumbuhan Ekonomi Nasional, Bank Sampoerna Terus Fokus Salurkan Pinjaman ke UMKM <i>Supporting National Economic Growth, Bank Sampoerna Continues to Focus on Distributing Loans to MSMEs</i>	13 Mei <i>May 13</i>
6	Selenggarakan Sampoerna Fest Surabaya, Bank Sampoerna Dorong Masyarakat Capai Kesejahteraan Keuangan <i>Holding Sampoerna Fest Surabaya, Bank Sampoerna Encourages the Community to Achieve Financial Well-being</i>	25 Mei <i>May 25</i>
7	Dorong Inklusi Keuangan, Bank Sampoerna dan JULO Beri Akses Kredit Secara Digital <i>Encouraging Financial Inclusion, Bank Sampoerna and JULO Provide Digital Credit Access</i>	2 Juli <i>July 2</i>
8	Hadirkan Sampoerna Fest di Pontianak, Bank Sahabat Sampoerna Dorong Pentingnya Literasi Keuangan bagi Masyarakat <i>Presenting Sampoerna Fest in Pontianak, Bank Sahabat Sampoerna Encourages the Importance of Financial Literacy for the Community</i>	27 Juli <i>July 27</i>
9	Demi Perluasan Jangkauan Layanan Keuangan Digital Masyarakat, Bank Sahabat Sampoerna Jali Kerja Sama dengan 360Kredi <i>To Expand the Reach of Digital Financial Services for the Community, Bank Sahabat Sampoerna Collaborates with 360Kredi</i>	6 Agustus <i>August 6</i>
10	Kedepankan Kolaborasi dengan Mitra Strategis, Bank Sampoerna Catatkan Pertumbuhan Kredit kepada UMKM <i>Prioritizing Collaboration with Strategic Partners, Bank Sampoerna Records Credit Growth to MSMEs</i>	9 Agustus <i>August 9</i>
11	PDaja.com dan BD Ekspor Dukung Pelaku UMKM Tembus Pasar Ekspor Demi Indonesia Emas 2045 <i>PDaja.com and BD Ekspor Support MSME Players to Penetrate Export Markets for Indonesia Emas 2045</i>	21 Agustus <i>August 21</i>
12	Perkuat Literasi Keuangan di Kalangan Gen Z, Bank Sampoerna Gelar Event Literasi Keuangan <i>Strengthening Financial Literacy Among Gen Z, Bank Sampoerna Holds Financial Literacy Event</i>	28 September <i>September 28</i>
13	Bank Sampoerna Gelar Sampoerna Fest di Semarang <i>Bank Sampoerna Holds Sampoerna Fest in Semarang</i>	9 November <i>November 9</i>
14	Perkuat Digitalisasi dan Kolaborasi, Bank Sampoerna Catatkan Pertumbuhan Solid Kredit UMKM <i>Strengthening Digitalization and Collaboration, Bank Sampoerna Records Solid Growth in MSME Credit</i>	12 November <i>November 12</i>
15	Sambut Hari Raya Natal, Bank Sampoerna Salurkan Dana Pendidikan bagi Anak-Anak Panti Asuhan Pintu Elok <i>Welcoming Christmas, Bank Sampoerna Distributes Education Funds for Children at Pintu Elok Orphanage</i>	17 Desember <i>December 17</i>

Media Relations Activity

Press Release and News Coverage

Throughout 2024, the Bank has published 15 press releases in the form of information transparency to the public and 369 news coverage regarding Bank Sahabat Sampoerna which were published in several media as follows.

2. Liputan Pemberitaan / News Coverage

Topik <i>Topic</i>	Jumlah Artikel <i>Number of Articles</i>
Kunjungan Nasabah <i>Customer Visit</i>	18
Sampoerna Fest	94
Kinerja Keuangan <i>Financial Performance</i>	82
Peresmian Kerja Sama <i>Partnership Inauguration</i>	40
Edukasi Literasi - Lomba Band <i>Literacy Education – Games Band</i>	16
CSR	35
Lainnya <i>Others</i>	35
Passing Mention	47
Jumlah <i>Total</i>	369

Media Gathering dan Media Visit

Bank juga melaksanakan kegiatan *media gathering* dan *media visit* kepada pihak media dengan tujuan mempererat hubungan antara Bank dengan insan media, serta mendukung keterbukaan informasi Bank kepada seluruh pemangku kepentingan. Informasi terkait *media gathering* dan *media visit* Bank selama tahun 2024 diungkapkan sebagai berikut:

Media Gathering dan Media Visit

The Bank also conducts media gathering activities and media visits to the media with the aim of strengthening the relationship between the Bank and media personnel, as well as supporting the Bank's information disclosure to all stakeholders. Information related to the Bank's media gathering and media visits during 2024 is disclosed below:

1. Media Gathering / Media Gathering

Kegiatan <i>Activity</i>	Tanggal <i>Date</i>	Tempat <i>Location</i>
Lunch with Media	18 September <i>September 18</i>	Sampoerna Strategic Square

2. Media Visit / Media Visit

Kegiatan <i>Activity</i>	Tanggal <i>Date</i>	Tempat <i>Location</i>
Media Visit Jawa Pos	7 Mei <i>May 7</i>	Kantor Jawa Pos <i>Jawa Pos Office</i>

Rencana Strategis Bank

Bank's Strategic Plan

Menyikapi perubahan lingkungan eksternal yang dinamis dan penyesuaian terhadap perubahan perundang-undangan yang berlaku, Bank Sahabat Sampoerna senantiasa mengkaji strategi bisnis, baik untuk jangka pendek, menengah, ataupun jangka Panjang, yang dituangkan dalam Rencana Bisnis Bank. Rencana strategis tersebut diuraikan sebagai berikut:

1. Rencana Strategis Jangka Pendek
 - a. Mempertahankan Risk Based Bank Rating (RBBR) dan *good corporate governance* (GCG) di peringkat komposit 2;
 - b. Tingkat pertumbuhan kredit sebesar 17,8%;
 - c. Tingkat pertumbuhan Dana Pihak Ketiga 20,0%;
 - d. Peningkatan kompetensi dan keahlian SDM;
 - e. Peningkatan penerapan manajemen risiko;
 - f. Peningkatan kualitas audit internal;
 - g. Jumlah modal inti;
 - h. Tingkat Non-Performing Loan (NPL) berada di bawah 5%;
 - i. Jumlah Aset Yang Diambil Alih (AYDA) sebesar Rp210,06 miliar;
 - j. Penerapan Customer Due Diligence (CDD) dalam rangka pelaksanaan APU, PPT dan PPPSPM.
2. Rencana Strategis Jangka Menengah
 - a. Mempertahankan peringkat komposit RBBR 2 dengan tetap memonitor setiap komponen dari RBBR dan meningkatkan *risk awareness* dan *compliance culture* seluruh staf Bank melalui pelatihan dan sosialisasi;
 - b. Jumlah Modal Inti akan terus ditingkatkan melalui strategi pertumbuhan organik (*internal growth*) dan juga melalui strategi rencana penambahan modal baik dari pemegang saham saat ini maupun dari investor baru lainnya, jika ada. Pemegang Saham Pengendali senantiasa berkomitmen untuk pemenuhan terhadap ketentuan permodalan sesuai dengan kebijakan dari OJK;
 - c. Sejalan dengan pencapaian jumlah Modal Inti di atas, maka sesuai dengan strata API yang dipilih, Bank akan tetap menjadi bank dengan fokus kegiatan usaha pada segmen tertentu, yaitu UMKM. Lebih lanjut Bank akan terus mengembangkan ekosistem open banking yang ditujukan untuk menyediakan berbagai macam produk/jasa keuangan digital untuk memenuhi kebutuhan UMKM yang berada dalam lingkup stakeholder Bank;

Responding to the dynamic changes in external environment and adjustments to amendments to applicable laws, Bank Sahabat Sampoerna constantly reviews its business strategies, for the short, medium, and long-term, as outlined in the Bank's Business Plan. The strategic plan is described as follows:

1. *Short-term Strategic Plans*
 - a. *To maintain the risk-based bank rating (RBBR) and good corporate governance (GCG) in rating 2;*
 - b. *Loan growth rate of 17.8%;*
 - c. *Growth rate of third-party funds (DPK) of 20.0%;*
 - d. *HR competency and expertise improvement;*
 - e. *Improved risk management implementation;*
 - f. *Improved internal control quality;*
 - g. *Conducting business activities in accordance with the provisions, as well as maintaining and increasing core capital;*
 - h. *The level of non-performing loans (NPL) below 5%;*
 - i. *Implementing strategy for repossession of foreclosed assets (AYDA) as much as Rp210.06 billion;*
 - j. *Applying the principle of Customer Due Diligence (CDD) in the context of implementing AML-CTF & PFPWMD.*
2. *Medium-Term Strategic Plans*
 - a. *Maintaining RBBR 2 rating while continuing to monitor each RBBR component and increasing risk awareness and compliance culture of all Bank staffs through training and dissemination;*
 - b. *The quantity of core capital will continuously be increased through organic growth strategy (internal growth) and strategy of planning to increase capital both from current Shareholders or from other new investors, if any. The Controlling Shareholder is always committed to meet the capital requirements in line with the Financial Services Authority policies;*
 - c. *In line with the achievement of the amount of Tier 1 Capital above, in accordance with the chosen API strata, the Bank will remain a bank with a focus on business activities in certain segments, namely MSMEs. Furthermore, the Bank will continue to develop an open banking ecosystem aimed at providing a wide range of digital financial products/ services to meet the needs of MSMEs within the scope of the Bank's stakeholders;*

- d. Dalam upaya meningkatkan struktur pendanaan yang sehat, di samping tetap meningkatkan penghimpunan DPK, Bank akan mengupayakan diperolehnya alternatif sumber-sumber pendanaan lainnya, seperti penerbitan surat berharga maupun pinjaman lainnya;
 - e. Bank akan terus menerus melaksanakan penguatan penerapan APU, PPT dan PPPSPM, sesuai ketentuan regulator berlaku dan perkembangan modus TPPU, TPPT dan PPPSPM;
 - f. Bank secara aktif berpartisipasi dalam agenda PPATK dan Lembaga Pengawas dan Pengatur (LPP), serta mendukung pencegahan dan penegakan UU TPPU, TPPT dan PPPSPM yang dilaksanakan aparat penegak hukum;
 - g. Bank senantiasa akan memperhatikan kinerja cabang dan melakukan penyesuaian jaringan kantor dengan menambah, menutup atau merelokasi Kantor Cabang, Kantor Cabang Pembantu, dan/atau Kantor Fungsional sesuai kebutuhan.
3. Rencana Strategis Jangka Panjang
- a. Berkomitmen untuk terus menjaga kelangsungan usaha Bank secara jangka panjang;
 - b. Memberikan nilai kepada masyarakat sekitar, karena tujuan Bank bukan hanya semata-mata untuk memperoleh keuntungan;
 - c. Terus-menerus membangun brand awareness dan memperluas jaringan kantor secara selektif sebagai investasi jangka panjang; dan
 - d. Bank secara konsisten mengembangkan platform usaha yang lebih bervariasi.
- d. *The Bank will look for other alternative sources of funding, such as issuing securities or other loans. This improves a healthy funding structure and continues to increase Third-Party Funds collection;*
 - e. *The Bank will keep working to improve quality and modify how AML-CTF & PFPWMD is implemented to ensure that it complies with all relevant laws and regulations and the development of AML-CTF & PFPWMD Laws;*
 - f. *The Bank actively participates in PPATK (Indonesian Financial Transaction Reports and Analysis Center) and Supervisory and Regulatory Agency (LPP), as well as supporting the prevention and enforcement TPPU, TPPT and PFPWMD Law conducted by law enforcement;*
 - g. *The Bank will constantly monitor the performance of its branches and modify the office network as necessary by adding, closing, or relocating branch offices, sub branch offices, and/or functional offices; and*
 - h. *Become a Foreign Exchange Bank*
3. *Long-Term Strategic Plan*
- a. *Committed to always maintaining the Bank's business continuity in the long-term;*
 - b. *Providing value to the surrounding community because the Bank's goals extend beyond just making a profit;*
 - c. *Continually building brand awareness and selectively expanding the office network as a long-term investment; and*
 - d. *The Bank consistently develops more varied business platform*

Pernyataan dan Pratik *Bad Corporate Governance*

Statement and Practices of Bad Corporate Governance

Bank Sahabat Sampoerna berupaya untuk membangun aktivitas bisnis yang baik dan selaras dengan peraturan perundang-undangan dengan berupaya menghindari adanya praktik *bad corporate governance*, sebagai berikut.

Bank Sahabat Sampoerna strives to build good business activities and in line with the laws and regulations by avoiding bad corporate governance practices, as follows.

Uraian <i>Description</i>	Praktik <i>Practice</i>
Adanya laporan sebagai Bank yang mencemari lingkungan <i>There are reports that the Bank pollutes the environment</i>	Nihil <i>None</i>
Perkara penting yang sedang dihadapi oleh Bank, anggota Dewan Komisaris, dan/atau Direksi yang sedang menjabat tidak diungkapkan dalam Laporan Tahunan <i>Significant cases currently faced by the Bank, members of Board of Commissioners, and/or members of Board of Directors are not disclosed in the Annual Report</i>	Nihil <i>None</i>
Ketidakpatuhan dalam pemenuhan kewajiban perpajakan <i>Non-compliance in fulfilling tax obligations</i>	Nihil <i>None</i>
Ketidaksesuaian penyajian Laporan Tahunan dan Laporan Keuangan dengan peraturan yang berlaku dan Standar Akuntansi Keuangan <i>Inconsistency of presentation of Annual Report and Financial Statements with the applicable regulations and Financial Accounting Standards (SAK)</i>	Nihil <i>None</i>
Kasus terkait buruh dan karyawan <i>Cases related to workers and employees</i>	Nihil <i>None</i>
Terdapat ketidaksesuaian antara Laporan Tahunan hardcopy dengan Laporan Tahunan softcopy <i>There is a discrepancy between the hardcopy of Annual Report and the softcopy of Annual Report</i>	Nihil <i>None</i>

Transparansi Kondisi Keuangan dan Non-Keuangan Bank yang Belum Diungkap dalam Laporan Lain

Transparency of the Bank's Financial and Non-Financial Condition that is Not Yet Disclosed in Other Reports

Sepanjang tahun 2024, Bank telah menyampaikan transparansi terhadap Laporan Tahunan (keuangan dan nonkeuangan) serta Laporan Keuangan Publikasi Triwulanan dan Laporan Keuangan Publikasi Bulanan dengan tepat waktu dan disampaikan di situs web Bank.

In 2024, the Bank has delivered transparency on the Annual Report (financial and non-financial) as well as Quarterly Published Financial Statements and Monthly Published Financial Statements in a timely manner and posted on the Bank's website.

Informasi Lain terkait Tata Kelola Bank

Other Information related to the Bank's Governance

Bank menjaga komitmen untuk melaksanakan aktivitas bisnis dengan baik tanpa adanya campur tangan dari pemilik ataupun pihak lainnya, serta menghindari adanya perselisihan internal ataupun permasalahan lainnya, terutama permasalahan yang timbul dari kesenjangan remunerasi. Pada tahun 2024, Bank telah melaksanakan aktivitas bisnis dengan baik dan bertanggung jawab merujuk pada prinsip-prinsip Tata Kelola Perusahaan (GCG), PUGKI, Kode Etik, Sampoerna Way, serta peraturan perundang-undangan yang berlaku.

The Bank maintains its commitment to carry out business activities well without any interference from the owner or any other parties, as well as avoiding internal disputes or other problems, particularly problems arising from remuneration gaps. In 2023, the Bank conducted its business activities well and responsibly by referring to the principles of Corporate Governance (GCG), PUGKI, Code of Conduct, Sampoerna Way, as well as applicable laws and regulations.