05

Tata Kelola Perusahaan

Corporate Governance

Komitmen Bank terhadap Penerapan Tata Kelola Perusahaan

The Bank's Commitment to Corporate Governance

Bank Sahabat Sampoerna senantiasa berkomitmen dalam menerapkan prinsip-prinsip Tata Kelola Peru sahaan yang Baik dalam melaksanakan kegiatan usaha Bank dengan senantiasa meningkatkan kepatuhan terhadap peraturan perundang-undangan yang berlaku di industri perbankan.

Bank Sahabat Sampoerna remains committed to applying the principles of Good Corporate Governance in conducting the Bank's business operations while continuously enhancing compliance with applicable laws and regulations in the banking industry.

Penerapan Tata Kelola Perusahaan yang Baik (*Good Corporate Governance*/GCG) merupakan landasan penting dalam mendukung pencapaian visi, misi dan tujuan Bank Sahabat Sampoerna. Implementasi prinsip GCG di Bank Sahabat Sampoerna dilakukan secara bertanggung jawab dengan mengedepankan lima prinsip utama GCG, yaitu keterbukaan, akuntabilitas, pertanggungjawaban, independensi, dan kewajaran.

The implementation of Good Corporate Governance (GCG) is a crucial foundation in supporting the achievement of Bank Sahabat Sampoerna's vision, mission, and objectives. The implementation of GCG principles at Bank Sahabat Sampoerna is done responsibly by prioritizing the five core principles of GCG: transparency, accountability, responsibility, independence, and fairness.

Dengan penerapan GCG yang konsisten dan menyeluruh dalam kegiatan operasional menjadi salah satu upaya Bank dalam mengintegrasikan aspek keberlanjutan dalam proses bisnis Bank, serta memperoleh pertumbuhan dan hasil yang optimal, Bank terus berupaya meningkatkan kualitas penerapan GCG seiring waktu dan menjadikan budaya GCG sebagai dasar dalam menjalankan aktivitas perbankan

Through the consistent and comprehensive implementation of GCG in its operational activities—which is one of the Bank's efforts to integrate sustainability into its business processes and achieve optimal growth and results—the Bank continues to strive to improve the quality of its GCG implementation over time and to establish a GCG culture as the foundation for conducting its banking activities

Landasan Hukum Penerapan Tata Kelola Perusahaan

Legal Basis for the Implementation of Corporate Governance

Dalam menerapkan GCG, Bank Sahabat Sampoerna senantiasa mengacu kepada sejumlah peraturan dan ketentuan yang berlaku di Indonesia, antara lain:

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").
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 Pelindungan Konsumen Bank Indonesia.
6. Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021 tentang Bank Umum.
7. SEOJK No 20/SEOJK.08/2025 Tentang Publikasi Penanganan Pengaduan Dan Laporan Layanan Pengaduan.
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 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.
10. 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.

In implementing GCG, Bank Sahabat Sampoerna consistently adheres to a number of regulations and provisions in force in Indonesia, including:

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, which has been enacted as a Law pursuant to Law No. 6 of 2023 on the Enactment of Government Regulation in Lieu of LawNo. 2 of 2022 on Job Creation into Law.*
3. *Law of the Republic of Indonesia No. 10 of 1998 on Amendments to Law No. 7 of 1992 on Banking, as amended by Law No. 4 of 2023 on the Development and Strengthening of the Financial Sector ("P2SK Law").*
4. *Bank Indonesia Regulation No. 23/11/PBI/2021 on National Payment System Standards, amending Bank Indonesia Regulation No. 22/23/PBI/2020 of 2020 on Payment Systems.*
5. *Bank Indonesia Regulation No. 3 of 2023 on Bank Indonesia Consumer Protection.*
6. *Financial Services Authority Regulation No. 12/POJK.03/2021 on Commercial Banks.*
7. *SEOJK No. 20/SEOJK.08/2025 on the Publication of Complaint Handling and Complaint Service Reports.*
8. *Financial Services Authority Regulation No. 22 of 2023 on Consumer and Public Protection in the Financial Services Sector, Amending Financial Services Authority Regulation No. 18/POJK.07/2018 on Consumer Complaint Services in the Financial Services Sector.*
9. *Financial Services Authority Regulation No. 13 of 2024 on Transparency and Publication of Base Lending Rates for Conventional Commercial Banks, amending Financial Services Authority Regulation No. 37/POJK.03/2019 on Transparency and Publication of Bank Reports.*
10. *Regulation of the Financial Services Authority of the Republic of Indonesia No. 27 of 2022 on the Second Amendment to Regulation of the Financial Services Authority No. 11/POJK.03/2016 on Minimum Capital Requirements for Commercial Banks.*

11. 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 dan Surat Edaran Otoritas Jasa Keuangan No. 26/SEOJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum sesuai Profil Risiko dan Pemenuhan Capital Equivalency Maintained Asset.
12. Peraturan Otoritas Jasa Keuangan Nomor 17 Tahun 2023 tentang Penerapan Tata Kelola Bagi Bank Umum dan Surat Edaran Otoritas Jasa Keuangan Nomor 14/ SEOJK.03/2025 Tentang Penerapan Tata Kelola Bagi Bank Umum.
13. Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit.
14. Peraturan Otoritas Jasa Keuangan No. 56/POJK.04/2015 tentang Pembentukan dan Pedoman Penyusunan Piagam Unit Audit Internal.
15. Peraturan Otoritas Jasa Keuangan Nomor 04/ OJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum.
16. 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.
17. Peraturan Otoritas Jasa Keuangan No. 9/POJK.03/2016 tentang Prinsip Kehati-hatian Bank Umum yang Melakukan Penyerahan sebagian Pelaksanaan Kerja kepada Pihak Lain dan 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.
18. Peraturan Otoritas Jasa Keuangan No. 13/POJK.03/2021 Tentang Penyelenggaraan Produk Bank Umum.
19. Peraturan Otoritas Jasa Keuangan Nomor 18/ POJK.03/2016 Tentang Penerapan Manajemen Risiko Bagi Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum.
20. Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2022 Tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum dan PADK 1 Tahun 2026 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum.
21. Peraturan Otoritas Jasa Keuangan No. 56/POJK.03/2016 Tentang Kepemilikan Saham Bank Umum.
22. 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.

11. Regulation of the Financial Services Authority No. 34/ POJK.03/2016 on Amendments to Regulation of the Financial Services Authority No. 11/POJK.03/2016 on Minimum Capital Requirements for Commercial Banks and Circular Letter of the Financial Services Authority No. 26/SEOJK.03/2016 on Minimum Capital Requirements in Accordance with Risk Profile and Compliance with Capital Equivalency Maintained Assets.
12. Financial Services Authority Regulation No. 17 of 2023 on the Implementation of Corporate Governance for Commercial Banks and Financial Services Authority Circular Letter No. 14/SEOJK.03/2025 on the Implementation of Corporate Governance for Commercial Banks.
13. Financial Services Authority Regulation No. 55/ POJK.04/2015 on the Establishment and Guidelines for the Operation of the Audit Committee.
14. Financial Services Authority Regulation No. 56/ POJK.04/2015 on the Establishment and Guidelines for the Preparation of Internal Audit Charters.
15. Financial Services Authority Regulation No. 04/ OJK.03/2016 on the Assessment of the Soundness of Commercial Banks.
16. Financial Services Authority Regulation No. 05/ POJK.03/2016 and Financial Services Authority Circular Letter No. 12/SEOJK.03/2021 on the Business Plan of Commercial Banks.
17. Financial Services Authority Regulation No. 9/ POJK.03/2016 on the Principles of Prudence for Commercial Banks Outsourcing Part of Their Operations to Third Parties and Financial Services Authority Circular Letter No. 11/SEOJK.03/2017 on the Principles of Prudence for Commercial Banks Outsourcing Part of Their Operations to Third Parties.
18. Financial Services Authority Regulation No. 13/ POJK.03/2021 on the Operation of Commercial Bank Products.
19. Financial Services Authority Regulation No. 18/ POJK.03/2016 on the Implementation of Risk Management for Commercial Banks and Financial Services Authority Circular Letter No. 34/SEOJK.03/2016 on the Implementation of Risk Management for Commercial Banks.
20. Financial Services Authority Regulation No. 11/ POJK.03/2022 on the Implementation of Information Technology by Commercial Banks and PADK 1 of 2026 on the Implementation of Information Technology by Commercial Banks.
21. Financial Services Authority Regulation No. 56/ POJK.03/2016 on Share Ownership in Commercial Banks.
22. Regulation of the Financial Services Authority of the Republic of Indonesia No. 11 of 2024 on the Second Amendment to Regulation of the Financial Services Authority No. 18/POJK.03/2017 on Reporting and Requesting Debtor Information Through the Financial Information Service System.

23. Peraturan Otoritas Jasa Keuangan Nomor 27/ POJK.03/2016 Tentang Penilaian Kemampuan Dan Kepatutan Bagi Pihak Utama Lembaga Jasa Keuangan dan 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.
24. Peraturan Otoritas Jasa Keuangan Nomor 10/ POJK.03/2015 Tentang Penerbitan Sertifikat Deposito Oleh Bank dan Surat Edaran Otoritas Jasa Keuangan No. 41/SEOJK.03/2016 tentang Tata Cara Penerbitan Sertifikat Deposito.
25. Peraturan Otoritas Jasa Keuangan No 6 /POJK.03/2016 Tentang Kegiatan Usaha Dan Jaringan Kantor Berdasarkan Modal Inti Bank dan Surat Edaran Otoritas Jasa Keuangan No. 27/SEOJK.03/2016 tentang KegiatanUsaha Bank Umum berdasarkan Modal Inti.
26. Peraturan Otoritas Jasa Keuangan No.46/POJK.03/2017 Tentang Pelaksanaan Fungsi Kepatuhan Bank Umum.
27. Surat Edaran Otoritas Jasa Keuangan No. 14/ SEOJK.03/2016 tentang Pembukaan Jaringan Kantor Bank Umum berdasarkan Modal Inti.
28. 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.
29. 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.
30. Surat Edaran Otoritas Jasa Keuangan Nomor 23/ SEOJK.03/2022 Tentang Perhitungan Aset Tertimbang Menurut Risiko Untuk Risiko Pasar Bagi Bank Umum.
31. 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 dan Peraturan Otoritas Jasa Keuangan Nomor 9 Tahun 2023 tentang Penggunaan Jasa Akuntan Publik dan kantor Akuntan Publik dalam Kegiatan Jasa Keuangan.
32. Peraturan Bank Indonesia No 19/15/PBI/2017 tentang Perubahan Kedua atas Peraturan Bank Indonesia Nomr 17/9/PBI/2015 tentang Penyelenggaraan Transfer Dana dan Kliring Berjadwal oleh Bank Indonesia dan 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

23. *Financial Services Authority Regulation No. 27/ POJK.03/2016 on the Assessment of Competence and Suitability for Key Personnel of Financial Services Institutions and Financial Services Authority Circular Letter No. 39/SEOJK.03/2016 on the Assessment of Competence and Suitability for Prospective Controlling Shareholders, Prospective Members of the Board of Directors, and Prospective Members of the Board of Commissioners of Banks.*
24. *Financial Services Authority Regulation No. 10/ POJK.03/2015 on the Issuance of Certificates of Deposit by Banks and Financial Services Authority Circular Letter No. 41/SEOJK.03/2016 on Procedures for the Issuance of Certificates of Deposit.*
25. *Financial Services Authority Regulation No. 6/ POJK.03/2016 on Business Activities and Branch Networks Based on a Bank's Core Capital and Financial Services Authority Circular Letter No. 27/SEOJK.03/2016 on the Business Activities of Commercial Banks Based on Core Capital.*
26. *Financial Services Authority Regulation No. 46/ POJK.03/2017 on the Implementation of Compliance Functions in Commercial Banks.*
27. *Financial Services Authority Circular Letter No. 14/ SEOJK.03/2016 on the Establishment of Commercial Bank Branch Networks Based on Core Capital.*
28. *Financial Services Authority Circular Letter No. 20/ SEOJK.03/2016 on Conversion Features into Common Stock or Write-Downs of Additional Tier 1 and Tier 2 Capital Instruments Financial Services Authority Circular Letter No. 23/SEOJK.03/2022 on the Calculation of Risk-Weighted Assets for Market Risk for Commercial Banks.*
29. *Financial Services Authority Circular Letter No. 6/ SEOJK.03/2020 on the Calculation of Risk-Weighted Assets for Operational Risk Using the Standardized Approach for Commercial Banks, amending Financial Services Authority Circular Letter No. 24/SEOJK. 03/2016 on the Calculation of Risk-Weighted Assets for Operational Risk Using the Standard Indicator Approach.*
30. *Financial Services Authority Circular Letter No. 23/ SEOJK.03/2022 on the Calculation of Risk-Weighted Assets for Market Risk for Commercial Banks.*
31. *Financial Services Authority Circular Letter No. 18/ SEOJK.03/2023 on Procedures for the Use of Public Accountants and Public Accounting Firms in Financial Services Activities and Financial Services Authority Regulation No. 9 of 2023 on the Use of Public Accountants and Public Accounting Firms in Financial Services Activities.*
32. *Bank Indonesia Regulation No. 19/15/PBI/2017 on the Second Amendment to Bank Indonesia Regulation No. 17/ 9/PBI/2015 on the Conduct of Fund Transfers and Scheduled Clearing by Bank Indonesia and Regulation of the Board of Governors No. 5 of 2024 on Amendments to Regulation of the Board of Governors No. 21/12/PADG/2019 on the Conduct of Fund Transfers and Scheduled Clearing by Bank Indonesia*

33. 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
34. Peraturan Bank Indonesia No. 21/10/PBI/2019 tanggal 30 Agustus 2019 tentang Pengelolaan Uang Rupiah.
35. 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
36. Peraturan Bank Indonesia No. 23/6/PBI/2021 tentang Penyedia Jasa Pembayaran.

33. Bank Indonesia Regulation No. 23/14/PBI/2021 of 2021 on the Fifth Amendment to Bank Indonesia Regulation No. 17/18/PBI/2015 on the Conduct of Transactions, Securities Administration, and Real-Time Fund Settlement
34. Bank Indonesia Regulation No. 21/10/PBI/2019 dated August 30, 2019, on the Management of the Indonesian Rupiah.
35. Bank Indonesia Regulation No. 23/2/PBI/2021 regarding the Third Amendment to Bank Indonesia Regulation No. 20/8/PBI/2018 on the Loan-to-Value Ratio for Property Loans, the Financing-to-Value Ratio for Property Financing, and Down Payments for Motor Vehicle Loans or Financing
36. Bank Indonesia Regulation No. 23/6/PBI/2021 on Payment Service Providers.

Penerapan Prinsip Tata Kelola Perusahaan

Penerapan GCG di Bank Sahabat Sampoerna dilakukan dengan menggunakan prinsip dasar yang ditetapkan di dalam ketentuan POJK dan SEOJK GCG yang berlkau bagi Bank Umum yaitu POJK Nomor 17 tahun 2023 dan SEOJK Nomor 14 tahun 2025 tentang Penerapan Tata Kelola Bank Umum. Bank Sahabat Sampoerna menerapkan 5 (lima) prinsip dasar GCG, yakni Transparansi, Akuntabilitas, Responsibilitas, Independensi, dan *Fairness* (TARIF). Bank telah melakukan penerapan prinsip dasar ini secara konsisten, terstruktur, dan diintegrasikan dalam struktur, proses, serta hasil tata kelola dengan mengikuti 3 aspek tata kelola (*governance*):

1. *Governance structure* melalui penguatan peran Dewan Komisaris, Direksi, dan komite.
2. *Governance Process* melalui efektivitas manajemen risiko, audit intern/ekstern, dan fungsi kepatuhan.
3. *Governance outcome* melalui kinerja keuangan dan non-keuangan yang berkelanjutan.

Implementation of Corporate Governance Principles

The implementation of GCG at Bank Sahabat Sampoerna is carried out in accordance with the fundamental principles established in the POJK and SEOJK regulations on GCG applicable to commercial banks, namely POJK No. 17 of 2023 and SEOJK No. 14 of 2025 concerning the Implementation of Corporate Governance in Commercial Banks. Bank Sahabat Sampoerna applies 5 (five) fundamental principles of GCG, namely Transparency, Accountability, Responsibility, Independence, and *Fairness* (TARIF). The Bank has consistently and systematically implemented these fundamental principles, integrating them into the structure, processes, and outcomes of governance by adhering to the three aspects of *governance*:

1. *Governance structure* through the strengthening of the roles of the Board of Commissioners, the Board of Directors, and committees.
2. *Governance Process* through the effectiveness of risk management, internal/external audit, and compliance functions.
3. *Governance outcomes* through sustainable financial and non-financial performance.

Prinsip-prinsip GCG *GCG Principles*	**Penjelasan** *Explanation*
Transpararency (Keterbukaan)	Bank wajib mengungkapkan informasi material dan relevan (keuangan dan non-keuangan) secara akurat, tepat waktu, dan mudah diakses oleh pemangku kepentingan (stakeholders). Informasi yang material, tepat waktu, relevan, akurat, dan jelas, dapat diakses oleh para pemangku kepentingan melalui situs web Bank (www.banksampoerna.com). *The Bank is required to disclose material and relevant information (financial and non-financial) accurately, in a timely manner, and in a way that is easily accessible to stakeholders.* *Material, timely, relevant, accurate, and clear information is accessible to stakeholders through the Bank's website (www.banksampoerna.com).*
Accountability (Akuntabilitas)	Kejelasan fungsi, struktur, sistem, dan pertanggungjawaban organ bank (Direksi, Komisaris, Komite) sehingga pengelolaan berjalan efektif dan profesional. Bank menetapkan fungsi, tugas, dan tanggung jawab seluruh komponen organisasi Bank dengan berlandaskan pada Visi, Misi, dan Tujuan Bank serta Sampoerna Way. *Clarity regarding the functions, structure, systems, and accountability of the Bank's bodies (Board of Directors, Board of Commissioners, Committees) to ensure effective and professional management.* *The Bank defines the functions, duties, and responsibilities of all organizational components based on the Bank's Vision, Mission, and Objectives, as well as the Sampoerna Way.*
Responsibility (Pertanggungjawaban)	Kepatuhan bank dalam mengelola usaha sesuai peraturan perundang-undangan yang berlaku dan prinsip korporasi yang sehat. *The Bank's compliance with applicable laws and regulations and sound corporate governance principles.*
Independency (Kemandirian/independensi)	Bank dikelola secara profesional tanpa benturan kepentingan dan bebas dari pengaruh/tekanan pihak lain yang tidak sesuai peraturan. *The Bank is managed professionally without conflicts of interest and is free from undue influence or pressure from third parties.*
Fairness *(Kewajaran dan Kesetaraan)*	Keadilan dan kesetaraan dalam memenuhi hak-hak *stakeholder* yang timbul berdasarkan perjanjian dan peraturan perundang-undangan. *Fairness and equality in fulfilling the rights of stakeholders arising from agreements and laws and regulations.*

Struktur dan Kerangka Kerja Tata Kelola Perusahaan

Corporate Governance Structure and Framework

Struktur Tata Kelola Perusahaan

Stru ktur tata kelola yang memadai akan mendukung penerapan prinsip *Good Corporate Governance* (GCG) sehingga perusahaan dapat mencapai hasil yang sesuai dengan harapan para pemangku kepentingan. Berdasarkan Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas, secara garis besar struktur tata kelola perusahaan terdiri atas tiga organ utama, yaitu Rapat Umum Pemegang Saham (RUPS), Dewan Komisaris dan Direksi.

Bank menilai kecukupan dan efektivitas penerapan prinsip Tata Kelola yang Baik secara komprehensif dan terstruktur terhadap tiga aspek tata kelola (*governance*), yaitu struktur tata kelola (*governance structure*), proses tata kelola (*governance process*), dan hasil penerapan tata kelola (*governance outcome*). Adapun struktur tata kelola Bank Sahabat Sampoerna adalah sebagai berikut:

Corporate Governance Structure

A sound corporate governance structure supports the implementation of Good Corporate Governance (GCG) principles, enabling the company to achieve results that meet the expectations of its stakeholders. Pursuant to Law No. 40 of 2007 on Limited Liability Companies, the corporate governance structure generally consists of three main bodies: the General Meeting of Shareholders (GMS), the Board of Commissioners, and the Board of Directors.

The Bank assesses the adequacy and effectiveness of the implementation of Good Corporate Governance principles in a comprehensive and structured manner across three governance aspects: governance structure, governance process, and governance outcomes. The governance structure of Bank Sahabat Sampoerna is as follows:

Struktur Tata Kelola Perusahaan (Governance Structure)

Struktur perusahaan yang jelas dan memadai merupakan fondasi utama dalam penerapan prinsip Tata Kelola yang Baik (*Good Corporate Governance*/GCG). Struktur tersebut berperan penting dalam memastikan adanya pemisahan fungsi, kejelasan wewenang, serta mekanisme pengawasan yang efektif di seluruh tingkatan organisasi. Dengan struktur yang tersusun secara sistematis, Bank mampu menghindari tumpang tindih kewenangan dan memperkuat akuntabilitas masing-masing organ dalam menjalankan tugas dan tanggung jawabnya.

Struktur organisasi yang jelas memungkinkan penerapan prinsip *checks and balances* berjalan secara efektif, khususnya antara fungsi pengawasan dan fungsi pengelolaan. Hal ini berdampak langsung pada kualitas pengambilan keputusan, pengendalian risiko, serta kepatuhan terhadap peraturan perundang-undangan yang berlaku. Selain itu, struktur yang memadai menjadi dasar bagi terbentuknya mekanisme pelaporan dan pengawasan yang transparan, sehingga potensi penyimpangan dapat diidentifikasi dan ditindaklanjuti secara tepat waktu.

Corporate Governance Structure

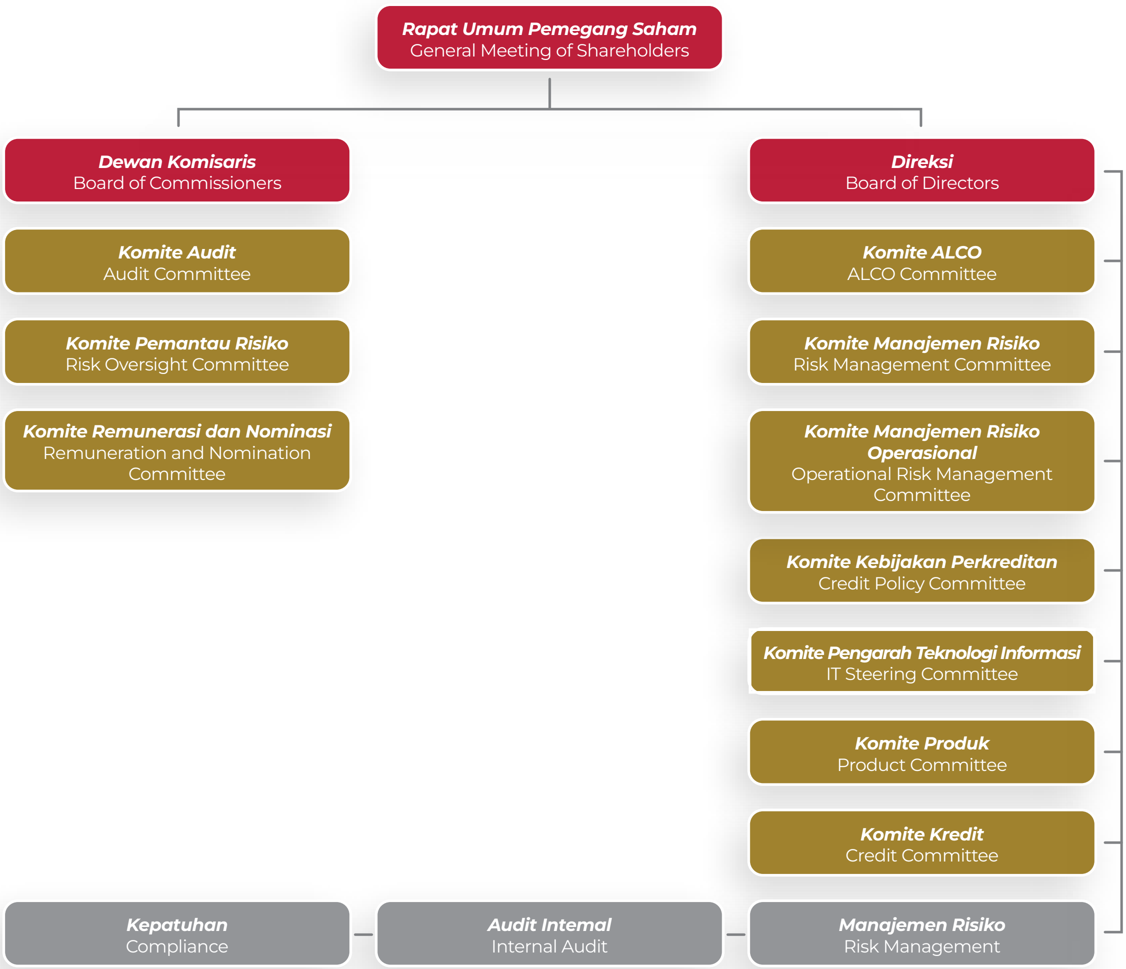
A clear and adequate corporate structure is the foundation of implementing the principles of Good Corporate Governance (GCG). This structure plays a vital role in ensuring the separation of functions, clarity of authority, and effective oversight mechanisms at all levels of the organization. With a systematically organized structure, the Bank is able to avoid overlapping authorities and strengthen the accountability of each governing body in performing its duties and responsibilities.

A clear organizational structure enables the effective implementation of the principle ***of checks and balances****, particularly between supervisory and management functions. This has a direct impact on the quality of decision-making, risk management, and compliance with applicable laws and regulations. Furthermore, an adequate organizational structure serves as the foundation for establishing transparent reporting and supervisory mechanisms, enabling potential misconduct to be identified and addressed in a timely manner.*

Adapun Struktur Tata Kelola Bank Sahabat Sampoerna terdiri sebagai berikut:
1. Rapat Umum Pemegang Saham (RUPS)
2. Dewan Komisaris
3. Direksi
4. Komite Audit
5. Komite Pemantau Risiko
6. Komite Remunerasi dan Nominasi
7. Komite-komite yang berada di bawah fungsi Direksi
8. Satuan Kerja Kepatuhan (SKK)
9. Satuan Kerja Manajemen Risiko (SKMR)
10. Satuan Kerja Audit Intern (SKAI)
11. *Corporate Secretary*
12. Unit kerja terkait

The corporate governance structure of Bank Sahabat Sampoerna consists of the following:
1. *General Meeting of Shareholders (GMS)*
2. *Board of Commissioners*
3. *Board of Directors*
4. *Audit Committee*
5. *Risk Monitoring Committee*
6. *Remuneration and Nomination Committee*
7. *Committees under the Board of Directors*
8. *Compliance Unit (SKK)*
9. *Risk Management Unit (SKMR)*
10. *Internal Audit Unit (SKAI)*
11. *Corporate Secretary*
12. *Related units*

Bagan Struktur Good Corporate Governance/GCG)
Organizational Chart for Good Corporate Governance (GCG)



Mekanisme Tata Kelola Perusahaan

Dalam memastikan penerapan GCG yang komprehensif, Bank telah memiliki mekanisme tata kelola yang mengacu pada peraturan perundang-undangan dan ketentuan yang berlaku. Mekanisme GCG ini bertujuan untuk menjelaskan hubungan antar organ Bank agar selaras dengan fungsi dan tugas yang telah ditetapkan. Untuk memastikan mekanisme GCG dapat berjalan optimal, Bank telah memiliki organ-organ yang 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;
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.

Corporate Governance Mechanisms

To ensure the comprehensive implementation of GCG, the Bank has established governance mechanisms in accordance with applicable laws and regulations. This corporate governance mechanism is intended to clarify the relationships among the Bank's bodies so that they are in line with their established functions and duties. To ensure that the corporate governance mechanism operates optimally, the Bank has established the following bodies:

1. *General Meeting of Shareholders (GMS)*
   The Bank's highest governing body, which makes significant decisions regarding the company. The GMS is convened by the Board of Commissioners and the Board of Directors, but the decisions resulting from the meeting are determined by the Shareholders;
2. *Board of Commissioners*
   The governingbody acting on behalf of the Shareholders is responsible for monitoring and overseeing the performance of the Board of Directors in managing the Bank;
3. *Board of Directors*
   The governing body that bears full responsibility for the Bank's operations, such as formulating business strategies, enhancing employee productivity and professionalism, managing employees, reporting the Bank's overall performance to the Shareholders, and other related matters;
4. *Supporting Bodies of the Board of Commissioners*
   The bodies tasked with assisting the Board of Commissioners in performing its duties and responsibilities, consisting of the Audit Committee, the Nomination and Remuneration Committee, and the Risk Monitoring Committee; and
5. *Supporting Bodies of the Board of Directors*
   The bodies responsible for assisting the Board of Directors in carrying out all operational functions consist 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.

Proses tata kelola (governance process)

Bank Sahabat Sampoerna menjalankan proses penerapan prinsip Tata Kelola yang Baik didukung oleh kecukupan struktur dan infrastruktur tata kelola Bank, sehingga menghasilkan *outcome* yang sesuai dengan harapan Pemangku Kepentingan Bank

Governance process

Bank Sahabat Sampoerna implements the principles of Good Governance supported by adequate governance structures and infrastructure, thereby producing outcomes that align with the expectations of the Bank's Stakeholders

Hasil penerapan tata kelola

Governance Outcome Bank Sahabat Sampoerna merupakan hasil proses penerapan prinsip Tata Kelola yang didukung oleh kecukupan struktur dan infrastruktur tata kelola Bank, yang mencakup aspek kualitatif dan aspek kuantitatif, antara lain: kecukupan transparansi laporan; kepatuhan terhadap ketentuan yang berlaku, perlindungan konsumen; objektivitas dalam melakukan penilaian (*assessment*) atau audit; kinerja Bank seperti rentabilitas, efisiensi, dan permodalan; dan/atau peningkatan atau penurunan kepatuhan terhadap ketentuan dan penyelesaian permasalahan yang dihadapi Bank.

Governance Outcomes

The governance outcomes of Bank Sahabat Sampoerna are the result of the implementation of governance principles, supported by the adequacy of the Bank's governance structure and infrastructure, which encompasses both qualitative and quantitative aspects, including: the adequacy of reporting transparency; compliance with applicable regulations and consumer protection; objectivity in conducting assessments or audits; the Bank's performance, such as profitability, efficiency, and capital adequacy; and/or improvements or declines in compliance with regulations and the resolution of issues encountered by the Bank.

Kebijakan Tata Kelola Perusahaan

Dalam rangka memastikan penerapan GCG dapat berjalan secara optimal, Bank Sahabat Sampoerna telah memiliki sejumlah kebijakan yang berlaku bagi seluruh organ Bank tanpa terkecuali. Bank Sahabat Sampoerna juga senantiasa melakukan evaluasi atas kebijakan tersebut secara berkala untuk menyesuaikan kebijakan-kebijakan tersebut dengan perkembangan bisnis terkini. Adapun kebijakan GCG yang dimiliki oleh Bank, di antaranya:

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 Policy

To ensure the optimal implementation of GCG, Bank Sahabat Sampoerna has established a number of policies that apply to all of the Bank's organizational units without exception. Bank Sahabat Sampoerna also regularly evaluates these policies to align them with the latest business developments. The Bank's GCG policies include the following:

1. *General Corporate Governance (GCG) Policy, which serves as the overarching internal policy for the implementation of Corporate Governance (GCG);*
2. *General Compliance Policy;*
3. *General Policy on Risk Management and Internal Control;*
4. *General Information Technology Risk Management Policy;*
5. *The Employee Code of Conduct is a formal document that requires all employees to behave in a professional, responsible, and appropriate manner, whether in conducting business with customers and partners or in their relationships with fellow employees;*
6. *Work Guidelines and Rules of Procedure, the Board of Commissioners, the Board of Directors, and committees assisting the Board of Commissioners; and*
7. *Policies and Standard Operating Procedures (SOPs), as well as other bank policies governing all business, operational, and business support activities.*

Pengembangan Kualitas Tata Kelola Perusahaan

Improving Corporate Governance Quality

Capaian Penerapan Tata Kelola Perusahaan Bank Sahabat Sampoerna Tahun 2025

Bank Sahabat Sampoerna secara konsisten melakukan perbaikan dan penyempurnaan terhadap implementasi GCG dengan melakukan penilaian terhadap hasil tata kelola di Bank. Penilaian hasil tata kelola tersebut merupakan *output* dari penerapan struktur dan proses tata kelola perusahaan di Bank, baik dari aspek hasil kinerja maupun praktik-praktik yang digunakan untuk mencapai hasil kinerja tersebut.

Dalam mengukur penerapan tata kelola perusahaan, Bank telah menetapkan fokus penerapan GCG agar dapat diterapkan secara terarah. Adapun fokus penerapan GCG yang dilaksanakan di tahun 2025, meliputi:

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 pengikinian 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.

Achievements in the Implementation of Corporate Governance at Bank Sahabat Sampoerna in 2025

Bank Sahabat Sampoerna consistently improves and refines its implementation of GCG by evaluating the Bank's governance outcomes. These governance outcomes are the result of the application of the Bank's corporate governance structure and processes, both in terms of performance results and the practices used to achieve those results.

In measuring the implementation of corporate governance, the Bank has established a focus for the implementation of GCG to ensure it is applied in a targeted manner. The focus of GCG implementation for 2025 includes:

1. *Upholding integrity, fairness, transparency, and a culture of compliance;*
2. *Improving and developing processes, methods, infrastructure, and the quality of risk management in line with business developments;*
3. *Fostering continuous synergy between the first line of defense, second line of defense, and third line of defense;*
4. *Improving processes, updating systems and procedures, enhancing human resource competencies, and strengthening quality assurance processes for key activities; and*
5. *Developing organizational structures in both the Business Division and the Supporting Division, tailored to the Bank's business growth and the risks it faces.*

Penilaian Penerapan Tata Kelola Perusahaan

Bank Sahabat Sampoerna secara berkala melakukan penilaian atas kualitas penerapan Tata Kelola Perusahaan yang Baik, dengan melakukan penilaian mandiri (*self-assessment*) atas implementasi GCG yang dilakukan oleh pihak internal minimal 2 (dua) kali dalam 1 (satu) tahun buku dan menyusun laporan pelaksanaannya. Penilaian yang dilakukan turut mengikutsertakan Dewan Komisaris, Direksi, pejabat eksekutif, dan seluruh divisi terkait yang dimiliki oleh Bank.

Assessment of Corporate Governance Implementation

Bank Sahabat Sampoerna periodically assesses the quality of its implementation of Good Corporate Governance by conducting internal self-assessments of GCG implementation at least twice per fiscal year and preparing reports on the results. The assessment involves the Board of Commissioners, the Board of Directors, executive officers, and all relevant divisions within the Bank.

Pelaksanaan *self-assessment* dilakukan untuk memperoleh peringkat penerapan tata kelola yang selanjutnya menjadi salah satu komponen penentu Tingkat Kesehatan Bank. Penilaian atas penerapan Tata Kelola Perusahaan yang Baik (GCG) tersebut dilaksanakan sejalan dengan ketentuan Peraturan Otoritas Jasa Keuangan (POJK) No. 4/POJK.03/2016 dan Surat Edaran Otoritas Jasa Keuangan (SEOJK) No. 14/SEOJK.03/2017 tentang Penilaian Tingkat Kesehatan Bank Umum.

The self-assessment is conducted to determine the implementation rating of corporate governance, which subsequently serves as one of the determining components of the Bank's Health Level. The assessment of the implementation of Good Corporate Governance (GCG) is carried out in accordance with the provisions of Financial Services Authority Regulation (POJK) No. 4/POJK.03/2016 and Financial Services Authority Circular Letter (SEOJK) No. 14/SEOJK.03/2017 regarding the Assessment of the Soundness Level of Commercial Banks.

Dasar Pelaksanaan Self-Assessment

Basis for Conducting the Self-Assessment

Pelaksanaan *self-assessment* atas penerapan prinsip Tata Kelola di Bank Sahabat Sampoerna dilakukan pal ing sedikit setiap semester untuk posisi akhir bulan Juni dan akhir bulan Desember sesuai dengan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 dan Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum.

Bank Sahabat Sampoerna conducts a self-assessment of its implementation of corporate governance principles bi ly, at the end of June and the end of December, in accordance with Financial Services Authority Regulation No. 17 of 2023 and Financial Services Authority Circular Letter No. 14/SEOJK.03/2025 regarding the Implementation of Corporate Governance for Commercial Banks.

Penilaian terhadap penerapan tata kelola berlandaskan pada 5 (lima) prinsip dasar Tata Kelola yang Baik pada Bank diantaranya Keterbukaan (*transparency*), Akuntabilitas (*accountability*), Tanggung jawab (*responsibility*), Independensi (*independency*), Kewajaran (*fairness*), dikelompokkan dalam 3 (tiga) aspek tata kelola (*governance*), yaitu struktur tata kelola (*governance structure*), proses tata kelola (*governance process*), dan hasil penerapan tata kelola (*governance outcome*)

The assessment of governance implementation is based on the 5 (five) fundamental principles of Good Governance in Banks, including Transparency, Accountability, Responsibility, Independence, Fairness, grouped into 3 (three) aspects of governance, namely governance structure, governance process, and governance outcome

Tujuan Pelaksanaan Self-Assessment

Purpose of the Self-Assessment

Tujuan pelaksanaan *self-assessment* atas penerapan GCG di lingkungan Bank, antara lain:

1. Penilaian *governance structure* bertujuan untuk menilai kecukupan struktur dan infrastruktur tata kelola Bank agar proses penerapan prinsip Tata Kelola yang Baik menghasilkan *outcome* yang sesuai dengan harapan Pemangku Kepentingan Bank. Yang termasuk dalam struktur tata kelola Bank adalah Direksi, Dewan Komisaris, Komite, dan Satuan Kerja pada Bank. Adapun yang termasuk infrastruktur tata kelola Bank, antara lain kebijakan dan prosedur Bank, sistem informasi manajemen serta tugas pokok dan fungsi masing-masing struktur organisasi.
2. Penilaian proses tata kelola (*governance process*) bertujuan untuk menilai efektivitas proses penerapan prinsip Tata Kelola yang Baik yang didukung oleh kecukupan struktur dan infrastruktur tata kelola Bank sehingga menghasilkan *outcome* yang sesuai dengan harapan Pemangku Kepentingan Bank.

The objectives of conducting a self-assessment of the implementation of GCG within the Bank include:

1. *The assessment of the governance structure aims to evaluate the adequacy of the Bank's governance structure and infrastructure so that the process of implementing the principles of Good Corporate Governance yields outcomes consistent with the expectations of the Bank's stakeholders. The Bank's governance structure includes the Board of Directors, the Board of Commissioners, Committees, and operational units within the Bank. The Bank's governance infrastructure includes the Bank's policies and procedures, management information systems, as well as the primary duties and functions of each organizational structure.*
2. *The governance process assessment aims to evaluate the effectiveness of the process for implementing the principles of Good Governance, supported by the Bank's adequate governance structure and infrastructure, so as to produce outcomes that meet the expectations of the Bank's stakeholders.*

3. Penilaian penerapan hasil tata kelola (*governance outcome*) bertujuan untuk menilai kualitas *outcome* yang memenuhi harapan Pemangku Kepentingan Bank yang merupakan hasil proses penerapan prinsip Tata Kelola yang Baik yang didukung oleh kecukupan struktur dan infrastruktur tata kelola Bank
   Adapun yang termasuk dalam *outcome* mencakup aspek kualitatif dan aspek kuantitatif, antara lain:
   a. kecukupan transparansi laporan;
   b. kepatuhan terhadap ketentuan peraturan perundang-undangan;
   c. pelindungan konsumen;
   d. objektivitas dalam melakukan penilaian (*assessment*) atau audit;
   e. kinerja Bank seperti rentabilitas, efisiensi, dan permodalan; dan/atau
   f. peningkatan atau penurunan kepatuhan terhadap ketentuan dan penyelesaian permasalahan yang dihadapi Bank seperti *fraud*, pelanggaran BMPK serta pelanggaran ketentuan terkait laporan bank kepada Otoritas Jasa Keuangan

3. The assessment of governance outcomes aims to evaluate the quality of outcomes that meet the expectations of the Bank's stakeholders, which are the results of the process of applying the principles of Good Governance supported by the adequacy of the Bank's governance structure and infrastructure.
The outcomes include both qualitative and quantitative aspects, such as:
a. adequacy of reporting transparency;
b. compliance with legal and regulatory provisions;
c. consumer protection;
d. objectivity in conducting assessments or audits;
e. the Bank's performance, such as profitability, efficiency, and capital adequacy; and/or
f. improvements or declines in compliance with regulations and the resolution of issues faced by the Bank, such as fraud, violations of the Legal Lending Limit (LLL), and violations of regulations regarding bank reporting to the Financial Services Authority

Kriteria Penilaian yang Digunakan dalam *Self-Assessment*

Dalam rangka memastikan penerapan 5 (lima) prinsip dasar Tata Kelola yang Baik, Mengacu pada ket entuan regulasi SEOJK 14/2025. Bank Sahabat Sampoerna melakukan penilaian sendiri (*self-assessment*) secara berkala yang paling sedikit meliputi 16 (enam belas) faktor penilaian penerapan tata kelola antara lain:

1. Pelaksanaan tugas, tanggung jawab, dan wewenang Direksi;
2. Pelaksanaan tugas, tanggung jawab, dan wewenang Dewan Komisaris;
3. Kelengkapan dan pelaksanaan tugas komite;
4. Penanganan benturan kepentingan;
5. Penerapan fungsi kepatuhan;
6. Penerapan fungsi audit intern;
7. Penerapan fungsi audit ekstern;
8. Penerapan manajemen risiko termasuk sistem pengendalian intern;
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, termasuk penerapan tanggung jawab sosial dan lingkungan; dan
16. Penerapan tata kelola dalam Kelompok Usaha Bank

Assessment Criteria Used in Self-Assessment

To ensure the implementation of the 5 (five) basic principles of Good Governance, in accordance with the provisions of SEOJK Regulation No. 14/2025. Bank Sahabat Sampoerna conducts periodic self-assessments covering at least 16 (sixteen) assessment factors regarding the implementation of governance, including:

1. The performance of the duties, responsibilities, and authorities of the Board of Directors;
2. The performance of the duties, responsibilities, and powers of the Board of Commissioners;
3. The composition and performance of committee duties;
4. Handling of conflicts of interest;
5. Implementation of the compliance function;
6. Implementation of the internal audit function;
7. Implementation of the external audit function;
8. Implementation of risk management, including internal control systems;
9. Remuneration;
10. Provision of funds to related parties and large-scale funding;
11. Reporting integrity and information technology systems;
12. The Bank's strategic plan;
13. Shareholder matters;
14. Implementation of anti-fraud strategies, including anti-bribery;
15. Implementation of sustainable finance, including social and environmental responsibility; and
16. Implementation of corporate governance within the Bank's Group

Pihak Pelaksana *Self-Assessment*

Pro ses penilaian sendiri (*self-assessment*) atas penerapan *Good Corporate Governance* (GCG) Bank Sahabat Sampoerna melibatkan seluruh Dewan Komisaris, Direksi, serta unit kerja yang terkait dengan faktor penilaian Tata Kelola sesuai dengan ketentuan POJK No. 17 Tahun 2023 dan SEOJK No.14/SEOJK.03/2025 Tentang Penerapan Tata Kelola Bagi Bank Umum, untuk menghasilkan penilaian yang komprehensif dan terstruktur atas efektivitas penerapan Tata Kelola Bank.

Self-Assessment Conducting Party

Pro 's self-assessment of the implementation of Good Corporate Governance (GCG) at Bank Sahabat Sampoerna involves the entire Board of Commissioners, the Board of Directors, and work units related to governance assessment factors in accordance with the provisions of POJK No. 17 of 2023 and SEOJK No. 14/SEOJK.03/2025 on the Implementation of Corporate Governance for Commercial Banks, to produce a comprehensive and structured assessment of the effectiveness of the Bank's corporate governance implementation.

Hasil *Self-Assessment*

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

Self-Assessment Results

The results of the self-assessment of GCG implementation at Bank Sahabat Sampoerna over the past 3 (three) years are as follows:

Aspek *Aspect*	**Nilai** *Score*		
	2025	**2024**	**2023**
Pelaksanaan Tugas dan Tanggung Jawab Direksi *Performance of the Board of Directors' Duties and Responsibilities*	1	1	2
Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris *Performance of Duties and Responsibilities of the Board of Commissioners*	1	1	2
Kelengkapan dan Pelaksanaan Tugas Komite *Composition and Performance of Committee Duties*	1	2	2
Penanganan Benturan Kepentingan *Handling Conflicts of Interest*	2	1	1
Penerapan Fungsi Kepatuhan Bank *Implementation of the Bank's Compliance Function*	2	2	1
Penerapan Fungsi Audit Intern *Implementation of the Internal Audit Function*	1	1	1
Penerapan Fungsi Audit Ekstern *Implementation of the External Audit Function*	1	1	1
Penerapan Fungsi Manajemen Risiko, termasuk Pengendalian Internal *Implementation of Risk Management Functions, including Internal Controls*	2	2	3
Pemberian Remunerasi *Remuneration*	1	1	1
Penyediaan Dana kepada Pihak Terkait dan Penyediaan Dana Besar *Provision of Funds to Related Parties and Large-Scale Funding*	1	2	1
Integritas Pelaporan dan Sistem Teknologi Informasi *Reporting Integrity and Information Technology Systems*	1	1	1
Rencana Strategis Bank *Bank Strategic Plan*	2	2	2
Aspek Pemegang Saham *Shareholder Aspects*	1	1	2
Penerapan Strategi *Anti-Fraud*, termasuk Anti Penyuapan *Implementation of Anti-Fraud Strategies, including Anti-Bribery*	1	2	1
Penerapan Keuangan Berkelanjutan *Implementation of Sustainable Finance*	2	1	2
Penerapan Tata Kelola dalam Kelompok Usaha Bank *Implementation of Corporate Governance in Banking Groups*	1	1	1
Peringkat Komposit *Composite Rating*	2	2	2

Berdasarkan hasil *self-assessment* pada tahun 2025, penerapan GCG Bank Sahabat Sampoerna memperoleh peringkat komposit 2 atau "BAIK" dengan analisis sebagai berikut:

Based on the results of the 2025 self-assessment, Bank Sahabat Sampoerna's implementation of GCG received a composite rating of 2, or "GOOD," with the following analysis:

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

Indikator *Indicator*	**Peringkat** *Rating*	**Definisi Peringkat** *Rating Definition*
Individual *Individual*	2	Mencerminkan Manajemen Bank telah melakukan penerapan Tata Kelola/*Good Corporate Governance* yang secara umum Baik Hal ini tercermin dari pemenuhan yang telah memadai atas prinsip-prinsip Tata Kelola/*Good Corporate Governance*. 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. *This indicates that the Bank's management has implemented Good Corporate Governance, which is generally Good* *This is reflected in the adequate compliance with the principles of Good Corporate Governance.* *Although there were still weaknesses in the implementation of Good Corporate Governance principles, these weaknesses were generally insignificant and could be resolved through normal management actions.*
Konsolidasian *Consolidated*	-	-

Analisis

Berdasarkan hasil *Self Assesment* terhadap aspek *Governance Structure*, *Governance Process* dan *Governance Outcome* terhadap 16 (enam belas) Faktor Penilaian Pelaksanaan Penerapan Tata Kelola (GCG) posisi Semester II Tahun 2025, Manajemen Bank Sahabat Sampoerna telah melakukan penerapan Tata Kelola (GCG) yang secara umum Baik, yang tercermin dari hal-hal sebagai berikut

1. Pelaksanaan tugas, tanggung jawab dan wewenang Direksi
    a. Direksi melaksanakan tugas dan tanggung jawabnya sesuai dengan rencana yang dituangkan di dalam RBB dan bertanggung jawab penuh atas pelaksanaan kepengurusan Bank dengan itikad baik dan dengan prinsip kehati-hatian;
    b. Direksi telah melaksanakan prinsip prinsip Tata Kelola yang baik dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi;
    c. Tidak ada intervensi pemegang saham dalam pelaksanaan tugas dan tanggung jawab Direksi. Direksi senantiasa melaporkan pencapaian kinerja keuangan bulanan (*unaudited*) kepada pemegang saham;

Analysis

Based on the results of the self-assessment of the Governance Structure, Governance Process, and Governance Outcome aspects regarding the 16 (sixteen) Assessment Factors for the Implementation of Good Corporate Governance (GCG) as of the second semester of 2025, the management of Bank Sahabat Sampoerna has implemented Good Corporate Governance (GCG) that is generally Good, as reflected in the following:

1. *Performance of the duties, responsibilities, and authority of the Board of Directors*
    a. *The Board of Directors conducts its duties and responsibilities in accordance with the plan set forth in the Bank Business Plan and is fully responsible for the management of the Bank in good faith and with the principle of prudence;*
    b. *The Board of Directors has implemented the principles of good corporate governance in all of the Bank's business activities at every level of the organization;*
    c. *There is no shareholder interference in the performance of the Board of Directors' duties and responsibilities. The Board of Directors consistently reports monthly financial performance (unaudited) to shareholders;*

d. Komposisi Anggota Direksi sudah memenuhi ketentuan yang ditetapkan oleh Regulator yaitu paling kurang 3 orang , jumlah anggota Direksi BSS sebanyak 5 orang. Seluruh anggota direksi berdomisili di Indonesia;

e. Pengalaman dan Pendidikan anggota Direksi relevan dengan tugas dan tanggung jawabnya. Seluruh anggota Direksi telah memiliki pengalaman paling kurang 5 tahun di bidang operasional dan sebagai Pejabat Eksekutif Bank;

f. Salah seorang anggota Direksi diangkat sebagai direktur utama, direktur utama berasal dari pihak yang independen terhadap pemegang saham pengendali;

g. Untuk Setiap usulan penggantian dan/atau pengangkatan anggota Direksi kepada RUPS telah memperhatikan rekomendasi komite yang menjalankan fungsi nominasi dengan mengedepankan komposisi secara profesional, independensi, kesesuaian kompetensi, dan memperhatikan keberagaman, yang dibutuhkan secara tepat dalam pelaksanaan tugas dan tanggung jawab Direksi;

h. Keseluruhan anggota Direksi tidak memiliki rangkap jabatan sebagai Komisaris, Direksi atau Pejabat Eksekutif pada Bank, perusahaan dan atau lembaga lain dan tidak memiliki saham melebihi 25% (dua puluh lima persen) dari modal disetor pada Bank dan atau pada suatu perusahaan lain;

i. Seluruh anggota Direksi tidak saling memiliki hubungan keluarga sampai dengan derajat kedua dengan sesama anggota Direksi dan/atau dengan anggota Dewan Komisaris.;

j. Seluruh anggota Direksi memiliki integritas yang teruji, kompetensi yang memadai dan reputasi keuangan yang baik serta telah lulus *fit and proper test* dan disetujui oleh OJK ;

k. Bank telah memiliki pedoman dan tata tertib Kerja yang telah mencantumkan pengaturan etika kerja, waktu kerja dan rapat Direksi yang telah disesuaikan dengan POJK 17 tahun 2023 tentang Penerapan Tata Kelola Bagi Bank Umum;

l. Seluruh anggota Direksi memiliki kemauan dan kemampuan dalam meningkatkan pengetahuan terkait bidang perbankan dan keuangan/bidang lainnya untuk mendukung pelaksanaan tugas dan tanggung jawabnya dan membudayakan pembelajaran secara berkelanjutan, semangat untuk terus belajar dan pengembangan diri telah menjadi cermin dan budaya organisasi Bank;

m. Direksi telah mengangkat anggota Komite, didasarkan pada keputusan rapat Dewan Komisaris, yang dituangkan lebih lanjut dalam memo persetujuan tertulis;

d. The composition of the Board of Directors meets the requirements set by the Regulator, namely a minimum of 3 members; the Board of Directors of Bank Sahabat Sampoerna consists of 5 members. All members of the Board of Directors are domiciled in Indonesia;

e. The experience and education of the members of the Board of Directors are relevant to their duties and responsibilities. All members of the Board of Directors have at least 5 years of experience in operational affairs and as Bank Executive Officers;

f. One member of the Board of Directors is appointed as the President Director; the President Director must be independent of the controlling shareholder;

g. For every proposal to replace and/or appoint members of the Board of Directors submitted to the General Meeting of Shareholders, the recommendations of the committee responsible for nominations have been taken into account, prioritizing professional composition, independence, suitability of competencies, and diversity, all of which are essential for the proper performance of the Board of Directors' duties and responsibilities;

h. No member of the Board of Directors holds concurrent positions as a Commissioner, other Director, or Executive Officer at the Bank, other companies, or institutions, nor does any member hold shares exceeding 25% (twenty-five percent) of the paid-in capital of the Bank or any other company;

i. No member of the Board of Directors is related by blood or marriage up to the second degree to any other member of the Board of Directors and/or to any member of the Board of Commissioners;

j. All members of the Board of Directors possess proven integrity, adequate competence, and a good financial reputation, and have passed the fit and proper test and been approved by the OJK;

k. The Bank has established guidelines and work regulations that include provisions on work ethics, working hours, and Board of Directors meetings, which have been aligned with OJK Regulation No. 17 of 2023 on the Implementation of Corporate Governance for Commercial Banks;

l. All members of the Board of Directors possess the willingness and ability to enhance their knowledge regarding banking and finance—as well as other fields—to support the fulfillment of their duties and responsibilities; the culture of continuous learning, the spirit of ongoing education, and self-development have become a hallmark of the Bank's organizational culture;

m. The Board of Directors has appointed Committee members based on the decision of the Board of Commissioners, which is further outlined in a written approval memo;

n. Tidak satupun anggota Direksi yang memberikan kuasa umum kepada pihak lain sehingga mengakibatkan adanya pengalihan tugas dan fungsi Direksi ke pihak lain , Direksi tidak memiliki penasihat perorangan atau jasa professional sebagai tenaga ahli atau konsultan;
o. Direksi menyediakan data dan informasi yang lengkap, akurat, terkini, dan tepat waktu kepada Dewan Komisaris;
p. Direksi mengungkapkan hal-hal yang bersifat strategis kepada pegawai meliputi kebijakan Bank dibidang kepegawaian, antara lain kebijakan mengenai perekrutan, sistem promosi serta sistem remunerasi;
q. Direksi melakukan monitoring ketat terhadap progress yang dilakukan seluruh Unit Kerja termasuk progress dalam rangka pemenuhan ketentuan BI/OJK dan/atau Regulator lainnya;
r. 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;
s. Direksi telah menetapkan kebijakan dan keputusan strategis melalui mekanisme rapat Direksi, Pengambilan keputusan Direksi senantiasa dilakukan berdasarkan musyawarah mufakat dengan 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 Direksi beserta alasan perbedaannya. Keputusan dan kebijakan strategis yang dilakukan Direksi telah memperhatikan pengawasan sesuai tugas dan tanggung jawab Dewan Komisaris;
t. Pelaksanaan RUPS dilakukan dengan persiapan yang baik sesuai dengan ketentuan POJK Tata Kelola Bank Umum dan POJK terkait lainnya .Direksi telah mempertanggungjawabkan pelaksanaan tugasnya kepada pemegang saham melalui RUPS dan Laporan pertanggungjawaban Direksi diterima oleh pemegang saham.

n. No member of the Board of Directors has granted general power of attorney to any other party, thereby resulting in the transfer of the Board's duties and functions to another party; the Board does not have any individual advisors or professional service providers acting as experts or consultants;
o. The Board of Directors provides complete, accurate, up-to-date, and timely data and information to the Board of Commissioners;
p. The Board of Directors discloses strategic matters to employees, including the Bank's policies regarding human resources, such as policies on recruitment, promotion systems, and compensation systems;
q. The Board of Directors closely monitors the progress made by all work units, including progress toward compliance with BI/OJK regulations and/or those of other regulators;
r. The Board of Directors does not use the Bank for personal, family, and/or third-party interests that harm or reduce the Bank's profits and does not take and/or receive personal benefits from the Bank other than remuneration and other benefits determined by the General Meeting of Shareholders;
s. The Board of Directors has established policies and strategic decisions through Board meetings. Decision-making by the Board is always based on consensus, guided by binding guidelines and rules of procedure that are the responsibility of all Board members. In the event of a dissenting opinion, it is clearly recorded in the minutes of the Board meeting along with the reasons for the disagreement. The strategic decisions and policies implemented by the Board of Directors have taken into account the oversight duties and responsibilities of the Board of Commissioners;
t. The General Meeting of Shareholders was conducted with thorough preparation in accordance with the provisions of the OJK Regulation on Corporate Governance of Commercial Banks and other relevant OJK regulations. The Board of Directors has accounted for the performance of its duties to the shareholders through the General Meeting of Shareholders, and the Board of Directors' accountability report was accepted by the shareholders.

2. Pelaksanaan tugas, tanggung jawab dan wewenang Dewan Komisaris
    a. Komposisi Dewan Komisaris sudah memenuhi ketentuan tanpa adanya intervensi pemilik. Jumlah anggota Dewan Komisaris telah sesuai dengan ketentuan yaitu sekurang-kurangnya 3 (tiga) orang dan tidak melampaui jumlah anggota Direksi, jumlah anggota Dewan Komisaris saat ini 4 orang,hal ini tidak melampaui jumlah Direksi yang berjumlah 5 orang . Seluruh anggota Dewan Komisaris berdomisili di Indonesia;

2. Performance of the duties, responsibilities, and authority of the Board of Commissioners
    a. The composition of the Board of Commissioners complies with regulations without any owner intervention. The number of Board of Commissioners members is in accordance with regulations, namely at least 3 (three) people and not exceeding the number of members of the Board of Directors; the current number of members of the Board of Commissioners are 4 people, which does not exceed the number of members of the Board of Directors, which are 5 people. All members of the Board of Commissioners are domiciled in Indonesia;

b. Bank memiliki pedoman dan tata tertib kerja Dewan Komisaris yang mencakup hal-hal yang diatur di dalam POJK 17 Tahun 2023 ;
c. Seluruh anggota Dewan Komisaris memiliki integritas, kompetensi dan reputasi keuangan yang memadai yang dapat digunakan dalam 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 dan melakukan pengawasan terhadap penyusunan strategi bisnis dan pelaksanaan kegiatan usaha oleh Direksi agar adanya keselarasan aspek lingkungan, sosial, dan tata kelola;
d. Seluruh anggota Dewan Komisaris Independen tidak berasal dari anggota Direksi maupun Pejabat Eksekutif Bank atau pihak-pihak yang memiliki hubungan dengan Bank yang dapat mempengaruhi kemampuannya untuk bertindak independen, dan tidak melakukan fungsi pengawasan serta berasal dari Bank sehingga tidak diperlukan masa tunggu (*cooling off*) dalam pelaksanaan tugasnya. Tidak terdapat Komisaris Independen yang berasal dari Komisaris Non Independen;
e. Pengangkatan kembali Komisaris Independen setelah menjabat selama 2 (dua) periode masa jabatan berturut-turut telah ditetapkan dalam rapat Dewan Komisaris bahwa yang bersangkutan tetap dapat bertindak independen, dan terdapat pernyataan mengenai independensinya dalam RUPS sesuai dengan POJK Tata Kelola Bank Umum;
f. Seluruh Komisaris Independen tidak memiliki hubungan keuangan, kepengurusan, kepemilikan dan hubungan keluarga dengan anggota Dewan Komisaris lainnya, anggota Direksi dan/atau Pemegang Saham Pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuannya untuk bertindak independen;
g. Dewan Komisaris telah melaksanakan tugas dan tanggung jawabnya secara independen. Dewan Komisaris melaksanakan pengawasan terhadap pelaksanaan tugas dan tanggung jawab Direksi secara berkala maupun sewaktu-waktu, serta memberikan nasihat kepada Direksi melalui rapat rutin bulanan antara Komisaris dengan Direksi dan rapat yang bersifat sewaktu-waktu dan melalui laporan-laporan serta informasi-informasi lain yang disampaikan manajemen kepada Dewan Komisaris;
h. Dewan Komisaris tidak terlibat dalam pengambilan keputusan kegiatan operasional Bank, kecuali dalam hal penyediaan dana kepada pihak terkait dan hal-hal lain yang ditetapkan dalam anggaran dasar Bank dan/atau peraturan perundang-undangan dalam rangka melaksanakan fungsi pengawasan;

b. The Bank has guidelines and rules of procedure for the Board of Commissioners that cover the matters stipulated in POJK 17 of 2023;
c. All members of the Board of Commissioners possess the integrity, competence, and sound financial reputation necessary to oversee the Bank, as well as to direct, monitor, and evaluate the implementation of the Bank's strategic policies in accordance with regulations, in order to foster the Bank's sound development, implement effective and efficient risk management and internal control systems, comply with applicable laws, regulations, and standards, and oversee the formulation of business strategies and the conduct of business activities by the Board of Directors to ensure alignment with environmental, social, and governance (ESG) aspects;
d. All members of the Board of Independent Commissioners are not members of the Board of Directors or Executive Officers of the Bank, nor are they parties affiliated with the Bank that could influence their ability to act independently; furthermore, they do not perform supervisory functions for the Bank, so no cooling-off period is required for the performance of their duties. There are no Independent Commissioners who were previously Non-Independent Commissioners;
e. The reappointment of an Independent Commissioner after serving two consecutive terms has been approved by the Board of Commissioners, which determined that the individual may continue to act independently, and that a statement regarding their independence is included in the General Meeting of Shareholders in accordance with the OJK Regulation on Corporate Governance of Commercial Banks;
f. None of the Independent Commissioners has any financial, managerial, ownership, or family ties with other members of the Board of Commissioners, members of the Board of Directors, and/or Controlling Shareholders, or any relationship with the Bank, that could affect their ability to act independently;
g. The Board of Commissioners has performed its duties and responsibilities independently. The Board of Commissioners supervises the performance of the Board of Directors' duties and responsibilities on a regular basis and from time to time, and provides advice to the Board of Directors through monthly meetings between the Commissioners and the Board of Directors, ad hoc meetings, and through reports and other information submitted by management to the Board of Commissioners;
h. The Board of Commissioners is not involved in decision-making regarding the Bank's operational activities, except in matters related to the provision of funds to related parties and other matters stipulated in the Bank's Articles of Association and/or applicable laws and regulations in the context of performing its supervisory functions;

i. Selama periode semester II tahun 2025 tidak ada pemberhentian dan/atau penggantian anggota Dewan Komisaris dan tidak terdapat pelanggaran peraturan perundang-undangan di bidang keuangan dan perbankan, dan keadaan atau perkiraan keadaan yang dapat membahayakan kelangsungan usaha Bank;
j. Seluruh anggota Dewan Komisaris merupakan Komisaris aktif dan menyediakan waktu yang cukup untuk melaksanakan tugas dan tanggung jawab secara optimal;
k. Anggota Dewan Komisaris tidak memanfaatkan Bank untuk kepentingan pribadi, keluarga dan/atau pihak lain yang merugikan atau mengurangi keuntungan Bank dan hanya menerima remunerasi dan fasilitas lainnya sebagaimana yang ditetapkan dalam RUPS dan tidak mengambil dan/atau menerima keuntungan pribadi dari Bank;
l. Anggota Komisaris Bank tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic;
m. Hasil rapat Dewan Komisaris dituangkan dalam notulen rapat dan didokumentasikan dengan baik serta telah dibagikan kepada seluruh anggota Dewan Komisaris dan pihak yang terkait.Hasil rapat Dewan Komisaris merupakan rekomendasi dan/atau arahan yang disampaikan dan telah diimplementasikan oleh RUPS dan/atau Direksi.

i. During the second half of 2025, there were no dismissals and/or replacements of Board of Commissioners members, and there were no violations of laws and regulations in the financial and banking sectors, nor any circumstances or anticipated circumstances that could jeopardize the Bank's business continuity;
j. All members of the Board of Commissioners are active Commissioners and dedicate sufficient time to optimally execute their duties and responsibilities;
k. Members of the Board of Commissioners shall not use the Bank for personal, family, and/or third-party interests that harm or reduce the Bank's profits, and shall only receive remuneration and other benefits as determined by the General Meeting of Shareholders, and shall not take and/or receive personal benefits from the Bank;
l. Members of the Bank's Board of Commissioners do not hold shares in either Bank Sahabat Sampoerna or any other company affiliated with the Sampoerna Strategic Group;
m. The results of the Board of Commissioners' meetings are recorded in meeting minutes, properly documented, and distributed to all members of the Board of Commissioners and relevant parties. The results of the Board of Commissioners' meetings constitute recommendations and/or directives that have been communicated and implemented by the General Meeting of Shareholders and/or the Board of Directors.

3. Kelengkapan dan pelaksanaan tugas Komite

a. Susunan Komite Audit telah memenuhi ketentuan dimana Anggota komite audit terdiri dari seorang Komisaris Independen, seorang Pihak Independen yang ahli di bidang keuangan atau akuntansi, dan seorang Pihak Independen yang ahli di bidang hukum atau perbankan, diketui oleh Komisaris Independen, Seluruh anggota terdiri dari komisaris independen dan pihak independen serta memiliki integritas, akhlak, dan moral yang baik;

b. Susunan Komite Pemantau Risiko telah memenuhi ketentuan dimana Anggota terdiri dari seorang Komisaris Independen, seorang Pihak Independen yang ahli di bidang manajemen risiko, dan seorang Pihak Independen yang ahli di bidang keuangan ,diketuai oleh Komisaris Independen, mayoritas anggota adalah Komisaris Independen dan Pihak Independen serta memiliki integritas, akhlak, dan moral yang baik;

c. Susunan Komite remunerasi dan nominasi telah memenuhi ketentuan dimana Anggota terdiri atas seorang Komisaris Independen, seorang Komisaris

3. Composition and Performance of the Audit Committee's Duties

a. The composition of the Audit Committee complies with the provisions whereby the members of the Audit Committee consist of an Independent Commissioner, an Independent Party who is an expert in finance or accounting, and an Independent Party who is an expert in law or banking, chaired by the Independent Commissioner. All members consist of independent commissioners and independent parties and possess integrity, good character, and high moral standards;

b. The composition of the Risk Monitoring Committee complies with the requirements, whereby the members of the Risk Monitoring Committee consist of one Independent Commissioner, one Independent Party with expertise in risk management, and one Independent Party with expertise in finance; the Committee is chaired by an Independent Commissioner, the majority of members are Independent Commissioners and Independent Parties, and all members possess integrity, good character, and high moral standards;

c. The composition of the Remuneration and Nomination Committee complies with the requirements, wherein the members consist of one

Non Independen, dan seorang Pejabat Eksekutif yang membawahkan sumber daya manusia yang memiliki pengetahuan dan mengetahui ketentuan sistem remunerasi dan/atau nominasi serta rencana suksesi (*succession plan*) Bank, diketuai oleh Komisaris Independen;

d. Seluruh Anggota komite audit, komite pemantau risiko, dan komite remunerasi dan nominasi dari Pihak Independen melaksanakan tugas, tanggung jawab, dan wewenang dengan berintegritas, independen, memiliki kompetensi, serta menjaga reputasi;

e. Tidak terdapat anggota komite audit, komite pemantau risiko, dan komite remunerasi dan nominasi yang merangkap sebagai anggota Direksi, baik di Bank yang sama maupun di Bank lain. Rangkap jabatan anggota komite dari Pihak Independen pada Bank yang sama, Bank lain dan/atau perusahaan lain telah memperhatikan kompetensi, kriteria independensi, kerahasiaan, kode etik, serta pelaksanaan tugas dan tanggung jawab. Pada semester II Tahun 2025 terdapat rangkap jabatan ketua komite pada 2 komite yaitu Komite Pemantau Risiko dan Komite Remunerasi & Nominasi;

f. Seluruh Pihak Independen anggota komite tidak memiliki hubungan keuangan, hubungan kepengurusan, hubungan kepemilikan, dan/atau hubungan keluarga dengan Direksi, Dewan Komisaris, dan/atau pemegang saham pengendali atau hubungan dengan Bank, yang dapat mempengaruhi kemampuan untuk bertindak independen;

g. Tidak ada pihak Independen yang berasal dari mantan Anggota Direksi atau mantan Pejabat Eksekutif yang berasal dari Bank yang sama dan tidak melakukan fungsi pengawasan atau pihak-pihak lain yang mempunyai hubungan dengan Bank yang dapat mempengaruhi kemampuan untuk bertindak independen sehingga tidak perlu menjalani masa tunggu (*cooling off*);

h. Bank memiliki pedoman dan tata tertib kerja untuk masing-masing komite, termasuk pelaksanaan evaluasi berkala terhadap kinerja komite;

i. Komite audit telah memantau dan mengevaluasi perencanaan dan pelaksanaan audit serta memantau tindak lanjut hasil audit dalam rangka menilai kecukupan pengendalian internal termasuk kecukupan proses pelaporan keuangan;

j. Komite Pemantau Risiko telah melakukan evaluasi terhadap kebijakan dan pelaksanaan manajemen risiko serta mengevaluasi pelaksanaan tugas Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko melalui laporan yang dibahas pada saat rapat berkala komite dimana di dalamnya melibatkan unit-unit kerja terkait sebagai risk taking units

Independent Commissioner, one Non-Independent Commissioner, and one Executive Officer in charge of human resources who possesses knowledge of and is familiar with the Bank's remuneration and/or nomination systems and succession plan, and is chaired by an Independent Commissioner;

d. All members of the Audit Committee, Risk Monitoring Committee, and Remuneration and Nomination Committee from the Independent Party perform their duties, responsibilities, and authorities with integrity, independence, and competence, while maintaining the Bank's reputation;

e. No member of the Audit Committee, Risk Monitoring Committee, or Remuneration and Nomination Committee holds a concurrent position on the Board of Directors, either at the same Bank or at another Bank. Concurrent positions held by committee members who are Independent Parties at the same Bank, another Bank, and/or as a member of the Board of Directors of another company have taken into account competence, independence criteria, confidentiality, the Code of Conduct, as well as the performance of duties and responsibilities. During the second semester of 2025, the Chairman concurrently held positions across two committees, namely the Risk Monitoring Committee and the Remuneration & Nomination Committee;

f. All Independent Committee Members have no financial, managerial, ownership, and/or family relationships with the Board of Directors, the Board of Commissioners, and/or controlling shareholders, nor any relationships with the Bank, that could impair their ability to act independently;

g. No Independent Party is a former member of the Board of Directors or a former Executive Officer of the same Bank and does not perform supervisory functions or is a party with ties to the Bank that could affect their ability to act independently, and therefore is not required to undergo a cooling-off period;

h. The Bank has guidelines and operating procedures for each committee, including the conduct of periodic evaluations of committee performance;

i. The Audit Committee has monitored and evaluated the planning and execution of audits and has monitored the follow-up on audit findings in order to assess the adequacy of internal controls, including the adequacy of the financial reporting process;

j. The Risk Monitoring Committee has evaluated the policies and implementation of risk management, as well as assessed the performance of the Risk Management Committee and the Risk Management Unit through reports discussed during the committee's regular meetings, which involve relevant business units as risk-taking units, as well as the serta SKMR dan Satuan Kerja Kepatuhan sebagai bagian yang bersifat independen atas pelaksanaan manajemen risiko yang dilakukan oleh risk taking units tersebut;

k. Komite Remunerasi dan Nominasi telah melakukan evaluasi kebijakan remunerasi yang berlaku bagi Dewan Direksi dan Dewan Komisaris serta Pejabat Eksekutif dan pegawai;

l. Hasil rapat Komite dibuat secara jelas dan didokumentasikan dengan baik, termasuk jika terdapat dissenting opinions. Keputusan rapat/rekomendasi Komite dilakukan secara musyawarah dan mufakat dan disamping itu dilakukan melalui sirkuler memo yang ditandatangani seluruh anggota Komite. Hasil keputusan Komite sudah dimanfaatkan secara optimal oleh Dewan Komisaris dan jika diperlukan untuk dibahas dalam Rapat Dewan Komisaris.

Risk Management Committee and the Compliance Unit as independent bodies overseeing the risk management activities conducted by those risk-taking units;

k. The Remuneration and Nomination Committee has evaluated the remuneration policies applicable to the Board of Directors and the Board of Commissioners, as well as Executive Officers and employees;

l. The results of Committee meetings are clearly recorded and well-documented, including any dissenting opinions. Committee decisions and recommendations are reached through deliberation and consensus, and are also communicated via through a circular memo signed by all Committee members. The Board of Commissioners makes full use of the Committee's decisions and, when necessary, discusses them at Board of Commissioners meetings.

4. Penanganan Benturan Kepentingan

a. Untuk mengidentifikasi, mengurangi, dan mengelola adanya potensi benturan kepentingan yang mungkin timbul dalam Bank akibat dari pelaksanaan kegiatan usaha Bank, Bank telah memiliki Kebijakan Standar Etika Karyawan, Kebijakan Penerapan Strategi Anti Fraud , Ketentuan Penerimaan Hadiah dari Pihak Ketiga, SOP Pengadaan Barang dan Jasa dan SOP Tata Kelola Vendor/Rekanan Pengadaan Barang dan Jasa yang mengikat setiap anggota Direksi, anggota Dewan Komisaris, anggota komite Bank, Pejabat Eksekutif, dan pegawai Bank;

b. Bank telah memiliki kebijakan dan prosedur yang mengatur mengenai benturan kepentingan khususnya terhadap ketentuan dan proses pembiayaan kepada pihak terkait Bank di dalam Kebijakan Perkreditan Bank (KPB) BSS serta Buku Pedoman Pemberian Kredit (PPK) Edisi Tahun 2020 Bab III. Risk Acceptance Criteria (RAC);

c. Tidak terjadi benturan kepentingan selama periode semester II tahun 2025, Anggota Direksi, Anggota Dewan Komisaris, Anggota Komite Bank, Pejabat Eksekutif, dan pegawai Bank tidak memiliki benturan kepentingan dalam setiap keputusan yang memenuhi kondisi adanya benturan kepentingan yang dapat merugikan Bank atau mengurangi keuntungan Bank. Bank akan mendokumentasikan setiap benturan kepentingan yang berpotensi merugikan Bank atau mengurangi keuntungan Bank;

d. Kegiatan operasional Bank bebas dari intervensi pemilik atau pihak terkait atau pihak lain yang dapat menimbulkan benturan kepentingan yang dapat merugikan Bank atau mengurangi keuntungan Bank.

4. Handling Conflicts of Interest

a. To identify, mitigate, and manage potential conflicts of interest that may arise within the Bank as a result of the Bank's business operations, the Bank has established a Standard Employee Ethics Policy, an Anti-Fraud Strategy Implementation Policy, and Guidelines for Accepting Gifts from Third Parties, Standard Operating Procedures (SOPs) for Goods and Services Procurement and SOPs for Vendor/Partner Management, as well as the Goods and Services Procurement Code of Conduct, which are binding on all members of the Board of Directors, members of the Board of Commissioners, members of the Bank's committees, Executive Officers, and Bank employees;

b. The Bank has policies and procedures governing conflicts of interest, particularly regarding the terms and processes for financing related parties of the Bank, as set forth in the Bank's Credit Policy (KPB) BSS and the Credit Granting Guidelines (PPK) 2020 Edition, Chapter III. Risk Acceptance Criteria (RAC);

c. No conflicts of interest arose during the second half of 2025; members of the Board of Directors, members of the Board of Commissioners, members of the Bank's committees, executive officers, and Bank employees had no conflicts of interest in any decisions that met the criteria for a conflict of interest that could harm the Bank or reduce the Bank's profits. The Bank will document any conflicts of interest that could potentially harm the Bank or reduce the Bank's profits;

d. The Bank's operational activities are free from interference by owners, related parties, or other parties that could give rise to conflicts of interest that could harm the Bank or reduce the Bank's profits.

5. Penerapan Fungsi Kepatuhan
   a. Bank memiliki direktur yang membawahi fungsi kepatuhan dan telah membentuk Satuan Kerja Kepatuhan yang bertanggung jawab langsung kepada Direktur Kepatuhan & Manajemen Risiko . Organisasi Satuan Kerja Kepatuhan independen terhadap satuan kerja operasional dan unit kerja lainnya serta berada di bawah supervisi langsung Direktur yang membawahkan fungsi kepatuhan;
   b. Direktur yang membawahkan fungsi kepatuhan memenuhi persyaratan independensi, serta memiliki integritas, pengetahuan dan pengalaman yang memadai dalam pengelolaan fungsi kepatuhan mengenai ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan;
   c. Sumber Daya Manusia (SDM) pada Satuan Kerja Kepatuhan (SKK) memiliki pengalaman yang memadai dalam pengelolaan fungsi kepatuhan. Bank senantiasa meningkatkan kompetensi dan kapasitas SDM SKK agar sejalan dengan perkembangan serta kompleksitas kegiatan usaha Bank;
   d. Direktur yang membawahkan fungsi kepatuhan telah melaksanakan tugas dan tanggung jawab dalam rangka penerapan fungsi kepatuhan dengan menetapkan langkah yang diperlukan dengan memperhatikan prinsip kehati-hatian , memantau dan menjaga kepatuhan agar kegiatan usaha Bank, perjanjian dan komitmen yang dibuat Bank tidak menyimpang dari ketentuan. Direktur yang membawahkan fungsi kepatuhan juga telah merumuskan strategi guna mendorong terciptanya budaya kepatuhan Bank;
   e. Satuan Kerja Kepatuhan melaporkan aktivitas bulanan kepada Direktur Kepatuhan & Manajemen Risiko. Direktur Kepatuhan & Manajemen Risiko telah menyampaikan laporan pelaksanaan tugas dan tanggung jawab kepada Direktur Utama dengan tembusan kepada Dewan Komisaris secara triwulanan serta laporan pelaksanaan tugas dan tanggung jawab kepada Regulator dengan tembusan Direktur Utama dan Dewan Komisaris secara semesteran;
   f. Bank telah memiliki Kebijakan Kepatuhan yang tercantum dalam Memo Internal BSS/KU-KEP/SKK/02 tertanggal 07 Mei 2024 Tentang Kebijakan Kepatuhan telah dilakukan penyesuaian berdasarkan POJK 17 Tahun 2023 dan SOP Uji Kepatuhan Bank dengan nomor BSS/SOP-HUK/SKK/04 diterbitkan pada Mei 2024;
   g. Direktur Kepatuhan & Manajemen Risiko telah memastikan bahwa seluruh kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan peraturan perundang-undangan melalui review yang dilakukan oleh Satuan Kerja Kepatuhan terhadap seluruh kebijakan, ketentuan, sistem dan prosedur serta produk

5. Implementation of the Compliance Function
   a. The Bank has a director overseeing the compliance function and has established a Compliance Unit that reports directly to the Compliance & Risk Director. The Compliance Unit is independent from operational units and other units and is under the direct supervision of the director overseeing the compliance function;
   b. The Director overseeing compliance functions meets the independence requirements and possesses the integrity, knowledge, and sufficient experience in managing compliance functions regarding the provisions of the Financial Services Authority and applicable laws and regulations;
   c. The Human Resources (HR) staff of the Compliance Unit (SKK) possess sufficient experience in managing compliance functions. The Bank continuously enhances the competence and capacity of the SKK's HR staff to keep pace with the development and complexity of the Bank's business activities;
   d. The Director overseeing the compliance function has carried out duties and responsibilities in implementing the compliance function by establishing necessary measures in accordance with the principle of prudence, monitoring and ensuring compliance so that the Bank's business activities, agreements, and commitments do not deviate from regulations. The Director overseeing the compliance function has also formulated strategies to foster a culture of compliance within the Bank;
   e. The Compliance Unit reports its monthly activities to the Compliance & Risk Director. The Compliance & Risk Director submits a report on the performance of duties and responsibilities to the President Director, with a copy to the Board of Commissioners, on a quarterly basis, as well as a report on the performance of duties and responsibilities regarding the Code of Conduct to the Regulator, with copies to the President Director and the Board of Commissioners, on a semi-annual basis;
   f. The Bank has a Compliance Policy set forth in Internal Memo BSS/KU-KEP/SKK/02 dated May 7, 2024, concerning the Compliance Policy, which has been adjusted in accordance with POJK 17 of 2023 and the Bank's Compliance Testing SOP numbered BSS/SOP-HUK/SKK/04, issued in May 2024;
   g. The Compliance & Risk Director has ensured that all policies, regulations, systems, and procedures, as well as the Bank's business activities, comply with the provisions of the Financial Services Authority and applicable laws and regulations through reviews conducted by the Compliance Unit of all policies, regulations, systems, and procedures, as well as new products, loans with a total exposure exceeding

baru, pemberian kredit dengan total exposure di atas Rp10 milyar (jaminan non back to back) dan pemberian kredit kepada pihak terkait , surat-surat dan laporan yang akan disampaikan ke Regulator;

h. Untuk meminimalkan Risiko Kepatuhan Bank, SKK bekerjasama dengan HC telah menyelenggarakan program *Compliance Awareness* yang dilakukan dengan metode *Digital Fun Learning (e-learning)* yang harus diikuti seluruh karyawan;

i. Satuan kerja kepatuhan telah melaksanakan tugas dan tanggung jawab membuat langkah dalam rangka mendukung terciptanya budaya kepatuhan pada seluruh kegiatan usaha Bank pada setiap jenjang organisasi, melakukan identifikasi, pengukuran, monitoring, dan pengendalian terhadap Risiko Kepatuhan dengan mengacu pada POJK mengenai penerapan manajemen risiko bagi bank umum , menilai dan mengevaluasi efektivitas, kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan peraturan perundang-undangan, melakukan kaji ulang dan/atau merekomendasikan penginian dan penyempurnaan kebijakan, ketentuan, serta sistem dan prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan OJK dan peraturan perundang-undangan, melakukan upaya untuk memastikan bahwa kebijakan, ketentuan, sistem dan prosedur, serta melakukan tugas lain yang terkait dengan fungsi kepatuhankegiatan usaha Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan peraturan perundangan-undangan;

j. Dewan Komisaris melakukan pengawasan aktif terhadap Fungsi Kepatuhan dengan mengevaluasi pelaksanaan Fungsi Kepatuhan Bank dan memberikan saran-saran dalam rangka meningkatkan kualitas pelaksanaan Fungsi Kepatuhan Bank;

k. Bank telah berhasil membangun budaya kepatuhan dalam pengambilan keputusan dan dalam kegiatan operasional bank , aktivitas pembangunan budaya kepatuhan dilakukan secara *hybrid*, melalui media *online* berupa diskusi menggunakan *Zoom Meeting*, serta pertemuan tatap muka dengan unit terkait, adanya koordinasi antara SKK, SKMR dan SKAI dalam meningkatkan kualitas budaya kepatuhan, budaya sadar risiko, dan pengendalian internal.

6. Penerapan Fungsi Audit Internal

a. Struktur dan hirarki SKAI telah memenuhi standar dan ketentuan yang berlaku, Kepala SKAI melapor dan bertanggung jawab langsung kepada Direktur Utama dan Komisaris melalui Komite Audit;

b. Bank telah memiliki standar pelaksanaan fungsi audit internal yang dituangkan dalam Piagam Audit Intern (*Internal Audit Charter*), yang ditetapkan oleh

Rp10 billion (non-back-to-back collateral), and loans to related parties, letters and reports to be submitted to the Regulator;

h. To minimize the Bank's compliance risks, the Compliance Unit, in collaboration with Human Resources, has implemented a Compliance Awareness program using the Digital Fun Learning (e-learning) method, which all employees are required to complete;

i. The Compliance Unit has carried out its duties and responsibilities to take steps aimed at fostering a culture of compliance across all of the Bank's business activities at every level of the organization; to identify, measure, monitor, and control Compliance Risks in accordance with the OJK Regulation on the implementation of risk management for commercial banks; and to assess and evaluate the effectiveness, adequacy, and the alignment of the Bank's policies, regulations, systems, and procedures with applicable laws and regulations; reviewing and/or recommending the revision and improvement of the Bank's policies, regulations, systems, and procedures to ensure compliance with OJK regulations and applicable laws and regulations; taking steps to ensure that the Bank's policies, regulations, systems, and procedures, and performing other duties related to the compliance function to ensure the Bank's business activities comply with Financial Services Authority (OJK) regulations and applicable laws and regulations

j. The Board of Commissioners actively oversees the Compliance Function by evaluating the implementation of the Bank's Compliance Function and providing recommendations to improve the quality of its implementation;

k. The Bank has successfully established a culture of compliance in decision-making and in the Bank's operational activities; efforts to build this culture of compliance are conducted in a hybrid manner, through online platforms such as Zoom Meetings, as well as in-person meetings with relevant units, with coordination among the Compliance, Risk Management, and Internal Audit units to enhance the quality of the compliance culture, risk-aware culture, and internal controls.

6. Implementation of the Internal Audit Function

a. The structure and hierarchy of the Internal Audit Unit (SKAI) comply with applicable standards and regulations; the Head of the Internal Audit Unit reports directly to the President Director and the Board of Commissioners through the Audit Committee;

b. The Bank has established standards for the performance of internal audit functions as set forth in the Internal Audit Charter, which is established by

Direktur Utama setelah memperoleh persetujuan dari Dewan Komisaris dengan mempertimbangkan rekomendasi Komite Audit dan direview secara periodik, selain itu Bank telah menyusun metodologi audit dan telah disahkan oleh pejabat terkait sebagai panduan audit intern;

c. Bank menyediakan SDM yang berkualitas pada SKAI untuk menyelesaikan tugas secara efektif dengan komposisi sesuai dengan kompleksitas kegiatan usaha yang dimiliki. Kepala SKAI memiliki kompetensi dan kemampuan yang memadai dalam memimpin fungsi audit intern yang independen dan objektif;
d. Direksi Bank bertanggung jawab atas terciptanya struktur pengendalian intern yang memadai serta menjamin terselenggaranya fungsi audit intern Bank secara efektif pada seluruh tingkatan manajemen;
e. Bank telah menerapkan fungsi audit intern secara efektif melalui pendekatan berbasis risiko (*Risk Based Audit*) yang didukung dengan Piagam Internal Audit untuk menetapkan maksud, tujuan, ruang lingkup tugas, dan kewenangan serta tanggung jawab dari Internal Audit, serta metodologi pelaksanaan audit dan penyusunan jadwal audit tahunan;
f. SKAI telah menyusun rencana audit tahunan dan alokasi anggaran dimana lingkup audit ditentukan berdasarkan pengukuran risiko terhadap seluruh auditable units pada kegiatan Bank yang telah disetujui oleh Direktur Utama dan Dewan Komisaris dengan mempertimbangkan rekomendasi Komite Audit menggunakan metodologi standar yang telah ditetapkan . Rencana pemeriksaan SKAI telah direalisasikan secara efektif;
g. Bank telah merencanakan dan merealisasikan peningkatan mutu keterampilan sumber daya manusia secara berkala dan berkelanjutan melalui kewajiban seluruh karyawan untuk mengikuti pelatihan minimal 40 jam/tahun;
h. SKAI telah melakukan fungsi pengawasan secara independen dengan cakupan tugas yang memadai dan sesuai dengan rencana, melaksanakan maupun memantau hasil audit, membuat analisis dan penilaian serta evaluasi kegiatan lain melalui audit, memperbaiki dan meningkatkan efisiensi penggunaan sumber daya manusia dan dana, dan memberikan saran perbaikan dan informasi yang objektif pada semua tingkatan manajemen;
i. SKAI telah menyampaikan Laporan Hasil Pemeriksaan kepada Komisaris, Direktur Utama, Direktur bidang terkait, Direktur Kepatuhan & Manajemen Risiko, unit kerja terkait, serta Komite Audit sesuai ketentuan yang berlaku dan melakukan monitoring tindak lanjut perbaikan temuan audit internal dan OJK sesuai komitmen yang telah disepakati dan kecukupan bukti yang disampaikan;

the President Director after obtaining approval from the Board of Commissioners, taking into account the recommendations of the Audit Committee, and is reviewed periodically; in addition, the Bank has developed an audit methodology that has been approved by the relevant officials as a guide for internal audits;

c. The Bank provides qualified personnel to the Internal Audit Unit (SKAI) to perform their duties effectively, with a staffing structure commensurate with the complexity of the Bank's business operations. The Head of the Internal Audit Unit possesses the necessary competencies and capabilities to lead an independent and objective internal audit function;
d. The Bank's Board of Directors is responsible for establishing an adequate internal control structure and ensuring the effective operation of the Bank's internal audit function at all levels of management;
e. The Bank has effectively implemented its internal audit function through a risk-based approach (Risk-Based Audit), supported by an Internal Audit Charter that defines the purpose, objectives, scope of duties, and the authority and responsibilities of Internal Audit, as well as an Internal Audit Manual outlining audit methodologies and the preparation of the annual audit schedule;
f. SKAI has prepared an annual audit plan and budget allocation, wherein the scope of the audit is determined based on risk assessments of all auditable units within the Bank's operations, which have been approved by the President Director and the Board of Commissioners, taking into account the recommendations of the Audit Committee using established standard methodologies. SKAI's audit plan has been effectively implemented;
g. The Bank has planned and implemented periodic and ongoing improvements in the quality of its human resources through a requirement that all employees complete at least 40 hours of training per year;
h. SKAI has performed its independent oversight functions with a scope of duties that is adequate and in accordance with the plan, conducting and monitoring audit results, performing analyses, assessments, and evaluations of other activities through audits, improving and enhancing the efficiency of human resource and fund utilization, and providing objective recommendations for improvement and information to all levels of management;
i. SKAI has submitted the Audit Report to the Board of Commissioners, the President Director, the relevant Division Directors, the Compliance & Risk Director, the relevant work units, and the Audit Committee in accordance with applicable regulations, and is monitoring the follow-up actions to address internal audit and OJK findings in accordance with the agreed-upon commitments and the adequacy of the evidence provided;

j. Kaji ulang atas pelaksanaan tugas dan kinerja SKAI dilakukan setiap tiga tahun. Untuk pelaksanaan kaji ulang oleh pihak eksternal dengan periode 1 Juli 2023 s/d 30 Juni 2026 saat ini sedang dalam proses pengajuan penunjukan pihak eksternal kepada manajemen Bank;
k. Fungsi SKAI telah dilaksanakan secara memadai , program audit telah mencakup keseluruhan unit kerja yang pelaksanaannya mempertimbangkan tingkat risiko pada masing-masing unit kerja, ruang lingkup audit telah memadai sesuai dengan prinsip SPFAIB antara lain terpenuhinya independensi, objektivitas, tidak ada pembatasan dalam cakupan dan ruang lingkup audit intern; dan terpenuhinya jumlah dan kualitas auditor intern.

j. A review of SKAI's duties and performance is conducted every three years. Regarding the external review for the period from July 1, 2023, to June 30, 2026, the process of proposing the appointment of an external party to the Bank's management is currently underway;
k. The functions of the Internal Audit Unit have been adequately implemented; the audit program has covered all work units, with implementation taking into account the risk level of each unit; the scope of the audit has been adequate in accordance with SPFAIB principles, including the fulfillment of independence and objectivity, the absence of restrictions on the scope and coverage of internal audits; and the fulfillment of the required number and quality of internal auditors.

7. Penerapan Fungsi Audit Ekstern
   a. Akuntan Publik (AP) dan Kantor Akuntan Publik (KAP) yang ditunjuk memiliki kinerja yang independen dengan kompetensi yang memadai dan 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 penunjukkan yang dilakukan oleh Dewan Komisaris atas wewenang dari RUPS dan rekomendasi dari Komite Audit;
   b. KAP yang ditunjuk telah melakukan komunikasi langsung dengan OJK perihal penugasan audit Laporan Keuangan Bank Sahabat Sampoerna tahun 2025 dengan surat No. 572/KAP-PIC/OJK/STM/XI-2025 tanggal 14 November 2025, komunikasi dilakukan pada tanggal 10 Desember 2025;
   c. Penugasan audit kepada akuntan publik dan kantor akuntan publik memenuhi aspek kapasitas , legalitas dan standar profesional dalam memberikan jasa audit;
   d. Penunjukan akuntan publik dan/atau kantor akuntan publik terlebih dahulu memperoleh persetujuan RUPS berdasarkan rekomendasi dari komite audit melalui Dewan Komisaris dan telah sesuai dengan peraturan perundang-undangan;
   e. Akuntan publik dan/atau kantor akuntan publik yang ditunjuk, mampu bekerja dan melaksanakan audit secara independen, memenuhi standar profesional akuntan publik dan perjanjian kerja serta ruang lingkup audit yang ditetapkan;
   f. Bank membatasi penggunaan jasa audit atas informasi keuangan historis dari akuntan publik yang sama sesuai dengan POJK mengenai penggunaan

7. Implementation of the External Audit Function
   a. The appointed Public Accountants (AP) and Public Accounting Firms (KAP) operate independently, possess adequate competence, and meet the professional standards for Public Accountants. This is inseparable from the effectiveness of the Bank's policies regarding audit assignments, which select both Public Accountants and Public Accounting Firms that are registered as Bank Auditors with the OJK through an appointment process conducted by the Board of Commissioners under the authority of the General Meeting of Shareholders and the recommendation of the Audit Committee;
   b. The appointed Public Accounting Firm has communicated directly with the OJK regarding the audit engagement of Bank Sahabat Sampoerna's 2025 Financial Statements via letter No. 572/KAP-PIC/OJK/STM/XI-2025 dated November 14, 2025, and; communication was conducted on December 10, 2025;
   c. The appointment of public accountants and public accounting firms for audit engagements must meet requirements regarding capacity, legal standing, and professional standards in the provision of audit services;
   d. The appointment of a public accountant and/or a public accounting firm must first obtain approval from the General Meeting of Shareholders based on a recommendation from the Audit Committee through the Board of Commissioners and must comply with applicable laws and regulations;
   e. The appointed public accountant and/or public accounting firm is capable of working and conducting audits independently, meets professional standards for public accountants and the terms of the engagement agreement, and adheres to the defined scope of the audit;
   f. The Bank limits the use of audit services for historical financial information provided by the same public accountant in accordance with the OJK Regulation

jasa akuntan publik dan/atau kantor akuntan publik dalam kegiatan jasa keuangan. Bank telah menunjuk kembali KAP yang sama pada tahun ini yaitu KAP Tanubrata Sutanto Fahmi Bambang & Rekan (BDO) dalam rangka Audit Laporan Keuangan tahun 2025 dan menunjuk AP yang sama yaitu Sutomo sebagai *Signing Partner*;

g. Bank telah menyampaikan laporan hasil audit dan management letter kepada Otoritas Jasa Keuangan yang telah menggambarkan informasi material mengenai kondisi Bank dan disampaikan secara tepat waktu dengan cakupan dan ruang lingkup sesuai ketentuan peraturan perundang-undangan dan telah menindaklanjuti rekomendasi hasil audit dari auditor ekstern.

8. Penerapan Manajemen Risiko termasuk Pengendalian Internal
   a. Bank telah memiliki Satuan Kerja Audit Intern (SKAI), Satuan Kerja Kepatuhan (SKK) dan Satuan Kerja Manajemen Risiko (SKMR) yang independen terhadap unit kerja operasional serta memiliki Komite Manajemen Risiko dalam rangka mendukung penerapan manajemen risiko, budaya kepatuhan, dan pengendalian intern yang baik dan memadai;
   b. Bank memiliki kebijakan, prosedur manajemen risiko dan penetapan limit yang cukup memadai dan dikaji ulang secara berkala atau secara insidentil bila dipandang perlu, sebagaimana tercantum dalam Memorandum Risk Appetite Statement (RAS) dan Limit Parameter Kredit Bank Sahabat Sampoerna (BSS)-2024 dengan Nomor 09/08/MI/SKMR/III/24 tanggal 14 Maret 2024;
   c. Bank telah memiliki kebijakan dan prosedur untuk mengidentifikasi dan mengelola aset bermasalah, klasifikasi aset, perhitungan terkait penyisihan dan pencadangan, dan hapus buku asset di dalam Pedoman Pemberian Kredit (PPK) No. 09/248a/MI/CP/I/2020 tanggal 22 Januari 2020;
   d. Bank telah memiliki kebijakan terkait penerapan tata kelola Bank yang telah dikinikan sesuai ketentuan POJK 17 tahun 2023 No.BSS/KU-GCG/SKK/03 tanggal 7 Mei 2024, manajemen risiko yang tercantum dalam Kebijakan Umum Manajemen Risiko (KUMR) dengan nomor 09/09/MI/SKMR/III/25 bulan Maret 2025 dan SOP uji kepatuhan dengan No.BSS/SOP-HUK SKK/04 Mei 2024 dan kebijakan umum Kepatuhan No. BSS/KU-KEP/SKK/02, tanggal 7 Mei 2024;
   e. Bank telah memiliki kebijakan terkait sistem peringatan dini yang tercantum dalam Kebijakan Umum Manajemen Risiko (KUMR) dengan nomor 09/09/MI/SKMR/III/25 bulan Maret 2025 beserta turunannya pada Pedoman Pemberian Kredit (PPK);
   f. Bank telah menerapkan manajemen risiko dan sistem pengendalian intern yang tepat dan efektif, serta melakukan evaluasi penerapan manajemen risiko secara berkala;

regarding the use of public accountants and/or public accounting firms in financial services activities. The Bank has reappointed the same public accounting firm this year, namely Tanubrata Sutanto Fahmi Bambang & Partners (BDO), to conduct the 2025 Financial Statement Audit, and has appointed the same public accountant, Sutomo, as the Signing Partner;

g. The Bank has submitted its audit report and management letter to the Financial Services Authority, which provide material information regarding the Bank's condition and were submitted in a timely manner with a scope and coverage in accordance with applicable laws and regulations, and has followed up on the audit recommendations from the external auditor.

8. Implementation of Risk Management, including Internal Controls
   a. The Bank has established an Internal Audit Unit (SKAI), a Compliance Unit (SKK), and a Risk Management Unit (SKMR) that are independent from operational units, as well as a Risk Management Committee to support the implementation of risk management, a culture of compliance, and sound and adequate internal controls;
   b. The Bank has policies, risk management procedures and limit setting that are sufficiently adequate and reviewed periodically or on an ad hoc basis when deemed necessary, as set forth in the Risk Appetite Statement (RAS) and Credit Limit Parameters of Bank Sahabat Sampoerna (BSS)-2024, No. 09/08/MI/SKMR/III/24 dated March 14, 2024;
   c. The Bank has policies and procedures for identifying and managing non-performing assets, asset classification, calculations related to allowances and provisions, and asset write-offs in the Credit Granting Guidelines (PPK) No. 09/248a/MI/CP/I/2020 dated January 22, 2020;
   d. The Bank has established policies regarding the implementation of corporate governance, which have been updated in accordance with the provisions of POJK 17 of 2023 No. BSS/KU-GCG/SKK/03 dated May 7, 2024, risk management as set forth in the General Risk Management Policy (KUMR) No. 09/09/MI/SKMR/III/25 dated March 2025, the compliance testing SOP No. BSS/SOP-HUK SKK/04 dated May 2024, and the General Compliance Policy ( ) No. BSS/KU-KEP/SKK/02, dated May 7, 2024;
   e. The Bank has established policies regarding early warning systems as set forth in the General Risk Management Policy (KUMR) No. 09/09/MI/SKMR/III/25 dated March 2025, along with its implementing guidelines in the Credit Granting Guidelines (PPK);
   f. The Bank has implemented appropriate and effective risk management and internal control systems, and conducts periodic evaluations of risk management implementation;

g. Bank menerapkan tata kelola, manajemen risiko, dan kepatuhan secara terintegrasi dalam proses pengambilan keputusan sesuai dengan kebijakan internal Bank dan ketentuan peraturan perundang-undangan;
h. Direksi telah menetapkan kebijakan, strategi, dan kerangka manajemen risiko yang disetujui oleh Dewan Komisaris yang terakomodir dalam Kebijakan Umum Manajemen Risiko (KUMR) No.09/09/MI/SKMR/III/25 tanggal Maret 2025. KUMR mencakup penerapan manajemen risiko terkait country risk dan transfer risk, penetapan limit risiko secara keseluruhan per jenis risiko, serta memperhatikan tingkat risiko yang diambil dan toleransi risiko terhadap kecukupan permodalan dan mekanisme persetujuan transaksi termasuk pelampauan limit dan kewenangan untuk setiap jenjang jabatan, wewenang dan tanggung jawab para pengelola risiko pada setiap jenjang jabatan yang terkait dengan penerapan manajemen risiko;
i. Direksi bertanggung jawab atas pelaksanaan kebijakan, strategi, dan kerangka manajemen risiko yang telah disetujui oleh Dewan Komisaris serta mengevaluasi dan memberikan arahan berdasarkan laporan yang disampaikan oleh SKMR termasuk laporan mengenai profil risiko dan memastikan seluruh risiko yang material dan dampak yang ditimbulkan oleh risiko dimaksud telah ditindaklanjuti dan telah menyampaikan laporan pertanggungjawaban kepada Dewan Komisaris secara berkala;
j. Direksi beserta unit terkait secara konsisten telah menindaklanjuti seluruh temuan Satuan Kerja Audit (SKAI) dan memastikan implementasi langkah perbaikan atas permasalahan atau penyimpangan dalam kegiatan usaha Bank;
k. Bank melakukan komunikasi yang memadai kepada seluruh jenjang organisasi tentang pentingnya pengendalian intern yang efektif dalam rangka mengembangkan budaya manajemen risiko termasuk kesadaran risiko pada seluruh jenjang organisasi;
l. Fungsi manajemen risiko telah diterapkan secara independen dengan adanya pemisahan fungsi antara SKMR yang melakukan identifikasi, pengukuran, pemantauan, dan pengendalian risiko dengan satuan kerja yang melakukan dan menyelesaikan transaksi;
m. Dewan Komisaris telah menyetujui Kebijakan Umum Manajemen Risiko yang didalamnya mencakup strategi dan kerangka manajemen risiko. Tingkat risiko yang diambil (*risk Appetite*) dan toleransi risiko (*Risk tolerance*) akan terus dipantau, dikaji ulang dan ditetapkan dari waktu ke waktu sesuai dengan kondisi yang dihadapi Bank melalui SKMR, rapat Komite Pemantau Risiko dan/atau Komite Manajemen Risiko;

g. The Bank integrates governance, risk management, and compliance into its decision-making processes in accordance with the Bank's internal policies and applicable laws and regulations;
h. The Board of Directors has established risk management policies, strategies, and frameworks approved by the Board of Commissioners, which are incorporated into the General Risk Management Policy (GRMP) No. 09/09/MI/SKMR/III/25 dated March 2025. The KUMR covers the implementation of risk management related to country risk and transfer risk, the setting of overall risk limits by risk type, as well as consideration of the level of risk taken and risk tolerance in relation to capital adequacy and transaction approval mechanisms including limit overrides and authorities for each job level, and the authority and responsibilities of risk managers at each job level related to the implementation of risk management;
i. The Board of Directors is responsible for implementing the policies, strategies, and risk management framework approved by the Board of Commissioners, as well as evaluating and providing guidance based on reports submitted by the Risk Management Unit (SKMR)—including reports on the risk profile—and ensuring that all material risks and their associated impacts have been addressed, and that accountability reports are submitted to the Board of Commissioners on a regular basis;
j. The Board of Directors, together with the relevant units, has consistently followed up on all findings of the InternalAudit Unit (SKAI) and ensured the implementation of corrective measures regarding issues or irregularities in the Bank's business activities;
k. The Bank communicates effectively to all levels of the organization regarding the importance of effective internal controls in order to foster a risk management culture, including risk awareness at all levels of the organization;
l. The risk management function has been implemented independently through the separation of functions between the Risk Management Unit (SKMR), which identifies, measures, monitors, and controls risks, and the operational units that execute and settle transactions;
m. The Board of Commissioners has approved the General Risk Management Policy, which includes risk management strategies and frameworks. The level of risk taken (risk appetite) and risk tolerance will be continuously monitored, reviewed, and determined from time to time in accordance with the conditions faced by the Bank through the General Risk Management Policy (SKMR), meetings of the Risk Monitoring Committee and/or the Risk Management Committee;

n. Dewan Komisaris mengevaluasi tanggung jawab Direksi secara berkala atas pelaksanaan Kebijakan Umum Manajemen Risiko, yang dilakukan paling sedikit 1 (satu) kali dalam 1 (satu) bulan.Bank telah melakukan pengkinian atas Kebijakan Umum Manajemen Risiko (KUMR) dengan nomor 09/09/MI/SKMR/III/25 bulan Maret 2025, sebagai penerapan atas ketentuan POJK No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum dan SEOJK No. 34/SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum
o. Sistem pengendalian intern dalam penerapan Manajemen Risiko dilaksanakan secara efektif dengan memperhatikan kebijakan dan prosedur yang berlaku. Prinsip pemisahan fungsi (*four eyes principle)* ditetapkan dengan memperhatikan eksposur risiko dan ketentuan yang berlaku, serta dilaksanakan secara konsisten;
p. Bank telah melakukan pencegahan dan penanganan agar kegiatan usaha Bank tidak dimanfaatkan dalam aktivitas yang terkait dengan tindak pidana untuk mendukung program APU, PPT, dan PPPSPM dengan mengevaluasi kesesuaian kebijakan dan prosedur APU, PPT, dan PPPSPM dengan perubahan dan perkembangan , mengevaluasi hasil pemantauan dan analisis transaksi nasabah untuk memastikan ada atau tidak adanya transaksi keuangan mencurigakan, transaksi keuangan tunai, dan/atau transaksi keuangan transfer dana dari dan ke luar negeri, mengidentifikasi area yang berisiko tinggi yang terkait dengan penerapan program APU, PPT, dan PPPSPM dengan mengacu pada peraturan perundang-undangan dan sumber informasi yang memadai, memberikan pelatihan tentang penerapan program APU, PPT, dan PPPSPM bagi pejabat dan/atau pegawai pelaku jasa keuangan serta memiliki sistem yang dapat mengidentifikasi, menganalisis, memantau dan menyediakan laporan secara efektif mengenai profil, karakteristik, atau kebiasaan pola transaksi yang dilakukan oleh nasabah;
q. Dewan Komisaris dan Direksi telah memastikan penerapan manajemen risiko mencakup country risk dan transfer risk melalui strategi dalam mengelola *country risk* dan *transfer risk* , penetapan limit risiko dan memantau kepatuhan terhadap limit eksposur *country risk* dan *transfer risk* , menyusun, menetapkan, dan memastikan penerapan kebijakan dan prosedur untuk mengidentifikasi, mengukur, memantau, dan mengendalikan risiko yang terkait dengan *country risk* dan *transfer risk* dalam kegiatan usaha bank, melakukan pemantauan terhadap perkembangannya dan menerapkan tindak lanjut yang memadai, melakukan pengendalian risiko kredit terhadap eksposur *country risk* dan *transfer risk* untuk masing-masing negara, yang mencakup eksposur intragrup, eksposur berdasarkan regional tertentu eksposur berdasarkan individu, dan eksposur berdasarkan pihak lawan transaksi;

n. The Board of Commissioners periodically evaluates the Board of Directors' performance regarding the implementation of the General Risk Management Policy, at least once a month. The Bank has updated the General Risk Management Policy (GRMP) under No. 09/09/MI/SKMR/III/25 dated March 2025, in accordance with POJK No. 18/POJK.03/2016 on the Implementation of Risk Management for Commercial Banks and SEOJK No. 34/SEOJK.03/2016 on the Implementation of Risk Management for Commercial Banks
o. The internal control system for risk management is implemented effectively in accordance with applicable policies and procedures. The four-eyes principle is established with due consideration for risk exposure and applicable regulations, and is consistently enforced;
p. The Bank has implemented preventive and corrective measures to ensure that its business operations are not exploited in activities related to criminal offenses, in support of the AML-CTF & CPWMD by evaluating the alignment of AML-CTF & CPWMD policies and procedures with changes and developments, evaluating the results of monitoring and analysis of customer transactions to ensure the presence or absence of suspicious financial transactions, cash transactions, and/or fund transfer transactions to and from abroad, identifying high-risk areas related to the implementation of the AML-CTF & CPWMD programs by referring to laws and regulations and adequate information sources; providing training on the implementation of AML-CTF & CPWMD programs for officials and/or employees of financial service providers; and having a system capable of effectively identifying, analyzing, monitoring, and reporting on the profile, characteristics, or habitual transaction patterns of customers;
q. The Board of Commissioners and the Board of Directors have ensured that risk management encompasses country risk and transfer risk through strategies for managing country risk and transfer risk, setting risk limits and monitoring compliance with country risk and transfer risk exposure limits, and developing, establishing, and ensuring the implementation of policies and procedures to identify, measure, monitoring, and controlling risks related to country risk and transfer risk in the bank's business activities, monitoring developments and implementing appropriate follow-up actions, and conducting credit risk controls on country risk and transfer risk exposures for each country, which include intragroup exposures, exposures based on specific regions, exposures based on individuals, and exposures based on counterparties;

r. Bank telah memiliki sistem informasi manajemen dalam Penerapan manajemen risiko terkait *couny risk* dan *transfer risk* yang mampu menyediakan data akurat, lengkap, tepat waktu, dan dapat diandalkan untuk mendukung laporan manajemen risiko yang memadai;
s. Direksi dan Dewan Komisaris Bank secara aktif melakukan pengawasan terhadap pelaksanaan kebijakan dan strategi manajemen risiko, termasuk yang berkaitan dengan *country risk* dan *transfer risk* serta pengelolaan aset bermasalah, penyisihan, dan pencadangan dalam pengelolaan risiko kredit;
t. Dewan Komisaris telah menyetujui dan mengevaluasi pelaksanaan Kebijakan Umum Manajemen Risiko (KUMR). Evaluasi atas strategi penerapan Manajemen Risiko Bank dilaksanakan diantaranya pada Rapat Komite Pemantau Risiko yang dilakukan paling sedikit 1 (satu) kali dalam 1 (satu) bulan untuk mengevaluasi tanggung jawab Direksi atas pelaksanaan Kebijakan Umum Manajemen Risiko termasuk kebijakan terkait country risk dan transfer risk;
u. Direksi telah menyusun kebijakan dan prosedur untuk mengidentifikasi dan mengelola aset bermasalah, klasifikasi aset, perhitungan terkait penyisihan dan pencadangan, dan hapus buku asetb) 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 reviu secara berkala terhadap pencadangan yang dibentuk agar sesuai dengan kondisi terkini, sesuai standar dan ketentuan peraturan perundang-undangan;
v. Bank telah melakukan kemitraan dalam kegiatan usaha sesuai prinsip kehati-hatian, manajemen risiko, dan pengelolaan Bank yang sehat;
w. Bank telah menerapkan manajemen risiko secara efektif, yang disesuaikan dengan tujuan, kebijakan, ukuran, dan kompleksitas usaha serta kemampuan Bank. Saat ini Bank menghadapi risiko yang signifikan pada risiko kredit dan risiko operasional;
x. Dewan Komisaris melalui Komite Pemantau Risiko mampu melakukan pengawasan terhadap penerapan manajemen risiko yang terkait country risk dan transfer risk yang dilakukan Bank, termasuk pelaksanaan evaluasi dan pengujian (*stress testing*).

9. Pemberian Remunerasi
   a. Bank telah memiliki kebijakan remunerasi sesuai dengan POJK penerapan tata kelola dalam pemberian remunerasi bagi bank umum dengan Nomor.BSS/KK-MRT/SDM/03 tanggal 1 Januari 2020;

r. The Bank has implemented a management information system for risk management related to country risk and transfer risk that is capable of providing accurate, complete, timely, and reliable data to support adequate risk management reporting;
s. The Bank's Board of Directors and Board of Commissioners actively oversee the implementation of risk management policies and strategies, including those related to country risk and transfer risk, as well as the management of non-performing assets, allowances, and provisions in credit risk management;
t. The Board of Commissioners has approved and evaluated the implementation of the General Risk Management Policy (GRMP). The evaluation of the Bank's risk management implementation strategy is conducted, among other things, at Risk Monitoring Committee meetings held at least once a month to assess the Board of Directors' responsibilities at regarding the implementation of the General Risk Management Policy, including policies related to country risk and transfer risk;
u. The Board of Directors has established policies and procedures for identifying and managing non-performing assets, classifying assets, calculating allowances and provisions, and write-offs of assets; b) periodically review the classification of assets and provisions for non-performing loans and/or financing, as well as adequately identify and manage non-performing assets, including provisions commensurate with the risks incurred, and periodically review the provisions established to ensure they align with current conditions, in accordance with standards and applicable laws and regulations;
v. The Bank has entered into business partnerships in accordance with the principles of prudence, risk management, and sound bank governance;
w. The Bank has effectively implemented risk management, tailored to the Bank's objectives, policies, size, and business complexity, as well as its capabilities. Currently, the Bank faces significant risks in credit risk and operational risk;
x. The Board of Commissioners, through the Risk Monitoring Committee, is able to monitor the implementation of risk management related to country risk and transfer risk undertaken by the Bank, including the conduct of evaluations and stress testing.

9. Remuneration
   a. The Bank has a remuneration policy in accordance with the OJK Regulation on the Implementation of Corporate Governance in the Granting of Remuneration for Commercial Banks, No. BSS/KK-MRT/SDM/03 dated January 1, 2020;

b. Penerapan dan pemantauan pelaksanaan kebijakan remunerasi di Bank dilakukan dengan mengacu pada prinsip kehati-hatian dan manajemen risiko dengan memperhatikan paling sedikit aspek kinerja, aspek risiko, kewajaran dengan peer group, sasaran, dan strategi jangka panjang Bank;

c. Dewan Komisaris telah melakukan pengawasan terhadap penerapan kebijakan Remunerasi ,kebijakan remunerasi sudah dilakukan review dan masih relevan dengan ketentuan terkait;

d. Bank telah menerapkan pemberian remunerasi dengan mempertimbangkan prinsip prudent risk taking untuk mendukung kelangsungan usaha Bank secara berkesinambungan dan telah mengungkapkan informasi kebijakan Remunerasi dalam laporan tahunan pelaksanaan tata kelola.

10. Penyediaan dana kepada Pihak terkait dan Penyediaan dana besar
    a. Bank telah memiliki kebijakan, sistem dan prosedur yang tertulis dan jelas untuk penyediaan dana kepada pihak terkait dan penyediaan dana besar berikut monitoring dan penyelesaian masalahnya di dalam Pedoman Pemberian Kredit (PPK) edisi tahun 2020, pada BAB XII Batas Maksimum Pemberian Kredit (BMPK) dan Surat Kuasa Substitusi pada buku PPK Edisi 2020, serta SOP Pelaksanaan Monitoring BMPK No.BSS/SOP-MRI/BMPK/SKMR/01, tanggal 26-10-2021 yang telah di evaluasi dan dilakukan penginian secara berkala;
    b. Bank telah menerapkan prinsip kehati-hatian dalam penyediaan dana besar dengan menerapkan penyebaran maupun diversifikasi portofolio penyediaan dana yang diberikan. Bank telah menetapkan limit-limit *Risk Appetite Statement* (RAS) dan Limit Perkreditan dengan diterbitkannya Memo No. 09/08/MI/SKMR/III/24 tanggal 14 Maret 2024;
    c. Untuk penyediaan dana kepada pihak terkait dan/atau penyediaan dana besar, Bank selalu memperhatikan ketentuan OJK tentang BMPK dan prinsip kehati-hatian. Untuk setiap penyediaan dana kepada pihak terkait, harus dilakukan uji kepatuhan oleh Satuan Kerja Kepatuhan dan disetujui oleh Dewan Komisaris;
    d. Bank telah menyampaikan laporan penyediaan dana kepada pihak terkait dan penyediaan dana besar (debitur inti) setiap bulannya kepada Otoritas Jasa Keuangan secara tepat waktu.

11. Integritas pelaporan dan Sistem Teknologi Informasi
    a. Bank telah memiliki kebijakan dan prosedur pengendalian internal dalam proses pelaporan keuangan serta tata cara pelaksanaan transparansi terkait informasi kondisi keuangan dan non keuangayang diatur dalam SOP Pelaporan Antasena

b. The implementation and monitoring of the remuneration policy at the Bank are conducted in accordance with the principles of prudence and risk management, taking into account at least the following aspects: performance, risk, comparability with peer groups, objectives, and the Bank's long-term strategy;

c. The Board of Commissioners has supervised the implementation of the remuneration policy; the remuneration policy has been reviewed and remains relevant to the relevant regulations;

d. The Bank has implemented a remuneration policy that takes into account the principle of prudent risk-taking to support the Bank's long-term sustainability and has disclosed information regarding its remuneration policy in its annual corporate governance report.

10. Provision of Funds to Related Parties and Large-Scale Funding
    a. The Bank has clear, written policies, systems, and procedures for the provision of funds to related parties and large-scale funding, including monitoring and resolution of issues, as outlined in the Credit Granting Guidelines (PPK) 2020 edition, in Chapter XII Maximum Credit Limit (BMPK) and Power of Attorney for Substitution in the 2020 edition of the PPK, as well as the SOP for BMPK Monitoring Implementation No. BSS/SOP-MRI/BMPK/SKMR/01, dated October 26, 2021, which has been evaluated and updated periodically;
    b. The Bank has applied the principle of prudence in providing large-scale funding by implementing portfolio diversification for the funds provided. The Bank has established limits for the Risk Appetite Statement (RAS) and Credit Limits through the issuance of Memo No. 09/08/MI/SKMR/III/24 dated March 14, 2024;
    c. For the provision of funds to related parties and/or large-scale funding, the Bank always adheres to OJK regulations regarding BMPK and the principle of prudence. For every provision of funds to a related party, a compliance review must be conducted by the Compliance Unit and approved by the Board of Commissioners;
    d. The Bank has submitted monthly reports on the provision of funds to related parties and large-scale funding (core debtors) to the Financial Services Authority in a timely manner.

11. Reporting Integrity and Information Technology Systems
    a. The Bank has established internal control policies and procedures for the financial reporting process, as well as guidelines for ensuring transparency regarding financial and non-financial information, as stipulated by the Financial Services Authority ( )

No. BSS/SOP-ANTS/AKT/01, SOP Pelaporan Bank Umum Melalui Sistem Pelaporan OJK No. BSS/SOP-APLO/AKT/01 serta Kebijakan Umum Manajemen Risiko (KUMR) No.09/09/MI/SKMR/III/25 bulan Maret 2025;

b. Bank secara rutin telah menyusun Laporan Pelaksanaan Tata Kelola Bank secara berkala pada setiap akhir tahun buku. Laporan Tata Kelola Bank disampaikan oleh Bank pada website yaitu www.banksampoerna.com bersamaan dengan Laporan Tahunan;

c. Bank telah memiliki Sistem Informasi Manajemen (SIM) yang digunakan untuk mendukung proses pelaporan di dalam internal perusahaan untuk membantu seluruh pengguna untuk mendapatkan laporan internal yang dibutuhkan secara akurat dan tepat waktu sehingga memudahkan dalam proses pengambilan keputusan;

d. Bank telah memiliki *Security System* yang memadai untuk memastikan keamanan sistem informasi Bank dari gangguan dan ancaman yang dapat menyebabkan kerusakan pada sistem informasi yang di dukung sumber daya manusia dengan tingkat kompetensi dan tingkat keahlian yang memadai;

e. Bank memiliki saluran penyebaran informasi melalui website resmi sebagai bentuk transparansi yang dapat diandalkan oleh para pemangku kepentingan,selain itu Bank juga menyampaikan seluruh pelaporan secara tertulis kepada Otoritas Jasa Keuangan (OJK);

f. Bank telah menerapkan proses pelaporan yang berintegritas guna memastikan kebenaran, keakuratan, serta transparansi informasi/laporan keuangan.;

g. Untuk mencerminkan prinsip transparansi, akuntabilitas, dan tanggung jawab, sehingga meningkatkan kualitas pelaporan keuangan, Direksi, Dewan Komisaris, dan Komite Audit menjalankan tugas dan tanggung jawabnya sesuai dengan ketentuan peraturan perundang-undangan;

h. Bank telah mewujudkan transparansi kondisi keuangan dan non-keuangan kepada seluruh stakeholders termasuk mengumumkan Laporan Keuangan Publikasi triwulanan dan melaporkannya kepada Otoritas Jasa Keuangan dan Pemangku Kepentingan (stakeholders) sesuai ketentuan yang berlaku;

i. Bank telah melaksanakan transparansi informasi produk kepada konsumen/nasabah sesuai dengan ketentuan yang diatur dalam POJK No. 13/POJK.03/2021 tentang Penyelenggaraan Produk Bank Umum. Dalam pengelolaan dan pemanfaatan data konsumen dan/atau nasabah, Bank tunduk dan patuh terhadap ketentuan dalam POJK Nomor 22 Tahun 2023 tentang Perlindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan serta UU No. 27 Tahun 2022 tentang Pelindungan Data Pribadi;

in the Antasena Reporting SOP No. BSS/SOP-ANTS/AKT/01, the Commercial Bank Reporting SOP via the OJK Reporting System No. BSS/SOP-APLO/AKT/01, and the General Risk Management Policy (KUMR) No. 09/09/MI/SKMR/III/25 dated March 2025;

b. The Bank has routinely prepared the Bank Governance Implementation Report periodically at the end of each fiscal year. The Bank Governance Report is published by the Bank on its website, www.banksampoerna.com, concurrently with the Annual Report;

c. The Bank has a Management Information System (MIS) in place to support internal reporting processes, enabling all users to obtain the necessary internal reports accurately and in a timely manner, thereby facilitating the decision-making process;

d. The Bank has an adequate security system to ensure the security of the Bank's information systems against disruptions and threats that could cause damage to the information systems, supported by human resources with adequate levels of competence and expertise;

e. The Bank maintains an information dissemination channel through its official website as a form of transparency that stakeholders can rely on, and the Bank also submits all reports in writing to the Financial Services Authority (OJK);

f. The Bank has implemented a reporting process based on integrity to ensure the truthfulness, accuracy, and transparency of financial information and reports;

g. To reflect the principles of transparency, accountability, and responsibility, thereby improving the quality of financial reporting, the Board of Directors, the Board of Commissioners, and the Audit Committee carry out their duties and responsibilities in accordance with applicable laws and regulations;

h. The Bank has ensured transparency regarding its financial and non-financial conditions to all stakeholders, including by publishing quarterly financial reports and submitting them to the Financial Services Authority and stakeholders in accordance with applicable regulations;

i. The Bank has implemented transparency regarding product information for consumers/customers in accordance with the provisions set forth in POJK No. 13/POJK.03/2021 on the Provision of Commercial Bank Products. In the management and utilization of consumer and/or customer data, the Bank is subject to and complies with the provisions of POJK No. 22 of 2023 regarding Consumer and Public Protection in the Financial Services Sector as well as Law No. 27 of 2022 regarding Personal Data Protection;

j. Bank telah mentransparansikan tata cara pengaduan nasabah dan penyelesaian sengketa kepada nasabah sesuai POJK pelindungan konsumen;

k. Bank telah menyusun dan menyajikan Laporan Keberlanjutan (Sustainability Report) sesuai dengan POJK Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, dengan cakupan yang mencerminkan aspek ekonomi, sosial, lingkungan, serta tata kelola;

l. Bank telah menyampaikan laporan terstruktur dan tidak terstruktur telah disampaikan kepada OJK secara tepat waktu.Bank telah menyampaikan Laporan Tahunan, Laporan Keuangan Audited Tahunan, Laporan Keuangan Publikasi Triwulan pada website Bank sebagai bentuk transparansi kepada Stakeholers termasuk juga dalam hal ini menyampaikan secara tertulis kepada OJK

m. Bank telah menyusun laporan pelaksanaan Tata Kelola (GCG) setiap tahun dengan isi dan cakupan yang telah sesuai dengan kriteria yang telah ditentukan. Penyampaian laporan pelaksanaan Tata Kelola menjadi satu kesatuan dengan Laporan Tahunan Bank sesuai dengan Ketentuan Otoritas Jasa Keuangan;

n. Dalam penyelenggaraan teknologi informasi, Bank berpedoman pada ketentuan POJK No 11/POJK.03/2022 dan SEOJK No. 29/SEOJK.03/2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum;

o. Bank telah menerapkan proses pelaporan keuangan yang berintegritas sesuai dengan kebijakan internal dan ketentuan peraturan perundang-undangan;

p. Laporan Keuangan Publikasi Triwulanan telah dipublikasikan dalam menu Hubungan Investor pada website Bank. Laporan Tahunan Bank 2024 telah disampaikan kepada OJK dan dicantumkan pada website Bank yaitu pada tanggal 30 April 2025;

q. Seluruh anggota Direksi dan seluruh anggota Komisaris tidak memiliki kepemilikan saham di Bank Sahabat Sampoerna maupun di perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic, dan tidak memiliki hubungan keuangan, kepengurusan, maupun kekeluargaan dengan anggota Dewan Komisaris lainnya, anggota Direksi, maupun Pemegang Saham Utama dan Pengendali;

r. Pada Periode semester II tahun 2025 tidak terdapat transaksi yang mengandung benturan kepentingan dan tidak terdapat buy back saham dan/atau Obligasi Bank. Selain itu tidak terdapat sanksi administratif yang bersifat material dan berdampak signifikan terhadap kegiatan usaha Bank, serta tidak terdapat sanksi administratif yang dikenakan kepada anggota Dewan Komisaris maupun anggota Direksi Bank yang diberikan Otoritas Jasa Keuangan dan otoritas lainnya kepada Bank;

j. The Bank has made its customer complaint procedures and dispute resolution process transparent to customers at in accordance with the OJK Regulation on Consumer Protection;

k. The Bank has prepared and presented a Sustainability Report in accordance with the OJK Regulation on the Implementation of Sustainable Finance for Financial Services Institutions, with a scope that reflects economic, social, environmental, and governance aspects;

l. The Bank has submitted both structured and unstructured reports to the OJK in a timely manner. Bank has published its Annual Report, Audited Annual Financial Statements, and Quarterly Financial Reports on the Bank's website as a form of transparency to stakeholders, including submitting these in writing to the OJK

m. The Bank has prepared an annual Corporate Governance (CG) Implementation Report, the content and scope of which comply with the established criteria. The submission of the Corporate Governance Implementation Report is integrated into the Bank's Annual Report in accordance with the regulations of the Financial Services Authority;

n. In the management of information technology, the Bank adheres to the provisions of POJK No. 11/POJK.03/2022 and SEOJK No. 29/SEOJK.03/2022 regarding the Management of Information Technology by Commercial Banks;

o. The Bank has implemented a financial reporting process with integrity in accordance with internal policies and applicable laws and regulations;

p. The Quarterly Financial Reports have been published in the Investor Relations section of the Bank's website. The Bank's 2024 Annual Report has been submitted to the OJK and posted on the Bank's website on April 30, 2025;

q. None of the members of the Board of Directors or the Board of Commissioners hold shares in Bank Sahabat Sampoerna or in any other company affiliated with the Sampoerna Strategic Group, nor do they have any financial, managerial, or family ties with other members of the Board of Commissioners, members of the Board of Directors, or the Major and Controlling Shareholders;

r. During the second half of 2025, there were no transactions involving conflicts of interest, and there were no buybacks of the Bank's shares and/or bonds. Furthermore, there were no material administrative sanctions that significantly impacted the Bank's business operations, nor were there any administrative sanctions imposed on members of the Board of Commissioners or the Board of Directors by the Financial Services Authority or other authorities;

s. Bank telah menerapkan transparansi informasi atas produk serta penggunaan data pribadi Nasabah melalui penjelasan kepada Nasabah baik secara lisan maupun tertulis, termasuk melalui penyediaan Syarat dan Ketentuan Umum (SKU) atas produk dan layanan Bank.

12. Rencana Strategis Bank
    a. Bank telah menyusun dan menyampaikan rencana strategis dalam bentuk Rencana Korporasi (corporate plan) dan Rencana Bisnis (*business plan*) sesuai dengan visi dan misi Bank. Bank telah menyusun rencana bisnis secara lengkap komprehensif, terukur (*achievable*) dan realistis dengan memperhatikan seluruh faktor eksternal dan faktor internal serta memperhatikan prinsip kehati-hatian dan asas perbankan yang sehat;
    b. Rencana strategis Bank didukung sepenuhnya oleh pemilik, hal ini tercermin dari komitmen dan upaya pemilik untuk memperkuat permodalan Bank, serta upaya penanganan dan/atau penyelesaian permasalahan keuangan Bank;
    c. Bank memiliki rencana untuk mengatasi permasalahan keuangan yang mungkin terjadi di Bank yang telah mendapatkan persetujuan pemegang saham dalam RUPS dan telah menyampaikan kepada OJK melalui Sistem Pelaporan OJK (SIPENA) berdasarkan Surat Nomor 09/668A/BSS/DIR/XI/2025 tanggal 28 November 2025 sesuai dengan yang dipersyaratkan dalam POJK No.5 Tahun 2024 tentang Penetapan Status Pengawasan dan Penanganan Permasalahan Bank Umum;
    d. Bank akan menjalankan opsi pemulihan untuk mengatasi permasalahan keuangan pada saat terjadi krisis permasalahan keuangan dan/atau penguatan modal Bank sebagaimana tercantum pada Laporan Rencana Aksi Pemulihan (*Recovery Plan*) yang telah disampaikan kepada OJK;
    e. Bank memastikan keselarasan rencana strategis Bank dengan RBB dan rencana korporasi Bank;
    f. Rencana Korporasi dan Rencana Bisnis Bank disusun oleh Direksi dan telah mendapat persetujuan Dewan Komisaris. Direksi telah mengkomunikasikan Rencana Korporasi dan Rencana Bisnis Bank beserta realisasinya kepada Pemegang Saham Bank melalui Dewan Komisaris serta kepada seluruh Kepala Divisi/Satuan Kerja untuk diteruskan kepada seluruh jenjang organisasi yang ada pada Bank;
    g. Rencana Bisnis Bank telah menggambarkan pertumbuhan Bank yang berkesinambungan dan sesuai dengan visi dan misi Bank.Pertumbuhan Bank telah dan senantiasa diupayakan untuk memberikan manfaat ekonomis dan non ekonomis bagi pemangku kepentingan / *stakeholders*;

s. The Bank has implemented transparency regarding information on products and the use of customers' personal data through explanations provided to customers both verbally and in writing, including through the provision of General Terms and Conditions (GTC) for the Bank's products and services.

12. Bank Strategic Plan
    a. The Bank has formulated and submitted strategic plans in the form of a Corporate Plan and a Business Plan in accordance with the Bank's vision and mission. The Bank has formulated a comprehensive, achievable, and realistic business plan, taking into account all external and internal factors while adhering to the principles of prudence and sound banking practices;
    b. The Bank's strategic plan is fully supported by the owners, as evidenced by their commitment and efforts to strengthen the Bank's capital, as well as their efforts to address and/or resolve the Bank's financial issues;
    c. The Bank has a plan to address potential financial issues at the Bank, which has been approved by shareholders at the General Meeting of Shareholders and has been submitted to the OJK through the OJK Reporting System (SIPENA) pursuant to Letter No. 09/668A/BSS/DIR/XI/2025 dated November 28, 2025, in accordance with the requirements of OJK Regulation No. 5 of 2024 concerning the Determination of Supervisory Status and Handling of Commercial Bank Issues;
    d. The Bank will implement recovery options to address financial problems in the event of a financial crisis and/or to strengthen the Bank's capital as set forth in the Recovery Plan that has been submitted to the OJK;
    e. The Bank ensures the alignment of the Bank's strategic plan with the RBB and the Bank's corporate plan;
    f. The Bank's Corporate Plan and Business Plan were prepared by the Board of Directors and have been approved by the Board of Commissioners. The Board of Directors has communicated the Corporate Plan and the Bank's Business Plan, along with their implementation, to the Bank's shareholders through the Board of Commissioners, as well as to all Division Heads/Work Units for dissemination to all levels of the Bank's organization;
    g. The Bank's Business Plan has outlined the Bank's sustainable growth in line with the Bank's vision and mission. The Bank's growth has been and continues to be pursued to provide economic and non-economic benefits for stakeholders;

h. Rencana strategis bank yang dituangkan dalam Rencana Bisnis Bank telah disusun atas dasar kajian yang komprehensif dengan memperhatikan peluang bisnis dan kekuatan yang dimiliki bank serta mengidentifikasikan kelemahan dan ancaman (*SWOT Analysis*).;
i. Rencana strategis Bank telah didukung dengan persiapan infrastruktur yang memadai antara lain SDM, teknologi informasi, jaringan kantor, serta kebijakan dan prosedur. Bank senantiasa melakukan investasi dalam pengembangan SDM, IT, jaringan kantor, kebijakan dan prosedur dalam rangka meningkatkan kualitas pelayanan kepada nasabah maupun peningkatan kualitas keamanan;
j. Dewan Komisaris telah melaksanakan pengawasan terhadap pelaksanaan Rencana Bisnis Bank melalui rapat rutin bulanan antara Dewan Komisaris dengan Direksi;
k. Pemilik dan Pemegang Saham Bank menunjukkan keseriusan dalam mendukung rencana strategis Bank, sehingga total modal Bank sudah sesuai dengan ketentuan POJK No. 12/ POJK.03/2020 mengenai Konsolidasi Bank Umum yakni Modal Inti Minimum Bank untuk tahun 2022 sebesar Rp 3 triliun. Modal inti Bank Sahabat Sampoerna per 31 Desember 2025 adalah sebesar Rp3,09 triliun;
l. Tidak ada intervensi pemilik terhadap pembagian keuntungan Bank yang dilakukan tanpa memperhatikan upaya pemupukan modal untuk mendukung rencana strategis Bank kedepannya. Sampai dengan semester II - 2025 belum ada pembagian keuntungan (dividen) kepada para pemegang saham;
m. Pemilik dan Pemegang Saham Bank menunjukkan keseriusan dalam mendukung rencana strategis Bank, sehingga total modal Bank sudah sesuai dengan ketentuan POJK No. 12/ POJK.03/2020 mengenai Konsolidasi Bank Umum . Bank telah menginformasikan rencana penanganan permasalahan keuangan dan/atau penguatan modal Bank kepada pemegang saham pengendali dan akan melaksanakan rencana tersebut dalam hal terjadi permasalahan keuangan di Bank;
n. Terdapat dukungan yang memadai dari Pemegang Saham Pengendali dalam penanganan dan/atau penyelesaian permasalahan keuangan yang terjadi di Bank, hal ini tercermin dari komitmen dalam menjaga keberlangsungan usaha Bank, antara lain melalui upaya penguatan permodalan serta pelaksanaan langkah-langkah strategis lainnya sesuai dengan ketentuan yang berlaku.

h. The Bank's strategic plan, as outlined in the Bank's Business Plan, has been developed based on a comprehensive analysis that takes into account the Bank's business opportunities and strengths, while also identifying its weaknesses and threats (SWOT Analysis).;
i. The Bank's strategic plan is supported by adequate infrastructure, including human resources, information technology, branch networks, as well as policies and procedures. The Bank consistently conducts investments in the development of human resources, IT, branch networks, policies, and procedures to enhance the quality of service to customers and improve security;
j. The Board of Commissioners has exercised oversight over the implementation of the Bank's Business Plan through regular monthly meetings between the Board of Commissioners and the Board of Directors;
k. The Bank's owners and shareholders have demonstrated a strong commitment to supporting the Bank's strategic plan, ensuring that the Bank's total capital is in compliance with the provisions of POJK No. 12/POJK.03/2020 regarding the Consolidation of Commercial Banks, specifically the Minimum Core Capital requirement for 2022 of Rp3 trillion. Bank Sahabat Sampoerna's core capital as of December 31, 2025, stands at Rp3.09 trillion;
l. There has been no owner intervention regarding the Bank's profit distribution, which is conducted by without disregarding efforts to build capital to support the Bank's future strategic plans. As of the second half of 2025, no profit distribution (dividends) has been made to shareholders;
m. The Bank's owners and shareholders have demonstrated their commitment to supporting the Bank's strategic plan, ensuring that the Bank's total capital complies with the provisions of POJK No. 12/POJK.03/2020 regarding the Consolidation of Commercial Banks. The Bank has informed the controlling shareholders of its plan to address financial issues and/or strengthen the Bank's capital and will implement this plan should financial issues arise at the Bank;
n. There is sufficient support from the Controlling Shareholders in addressing and/or resolving financial issues arising at the Bank; this is reflected in their commitment to ensuring the Bank's business continuity, including through efforts to strengthen capital and the implementation of other strategic measures in accordance with applicable regulations.

13. Aspek Pemegang Saham
    a. Pemegang saham bank mendukung terlaksananya kegiatan usaha dan pengelolaan Bank yang sehat, berdaya saing serta sesuai prinsip kehati-hatian dan manajemen risiko;
    b. Bank telah memiliki kebijakan dividen No. BSS/KK-KD/AKT/01 yang didalamnya memuat mekanisme penetapan dividen dan cakupan lain sesuai dengan POJK 17 tahun 2023, diantaranya Pertimbangan Bank dalam pembagian dividen, besaran dividen yang diberikan, mekanisme persetujuan usulan pembagian dividen dan Periode pengkinian kebijakan dividen. Hal ini untuk memastikan perlakuan yang adil terhadap seluruh pemegang saham;
    c. Bank Sampoerna merupakan perusahaan tertutup dengan jumlah pemegang saham yang sangat terbatas.Bank tidak memiliki program terkait kepemilikan dan pelepasan saham yang merupakan hasil dari ESOP/MSOP yang memungkinkan karyawan;
    d. Bank belum pernah membagikan dividen kepada pemegang saham. Dalam RBB tahun 2025-2027 Bank juga tidak merencanakan adanya pembagian dividen;
    e. Bank telah mengomunikasikan kebijakan terkait dividen kepada pemegang saham , ketentuan penginian secara berkala atas kebijakan dividen tercantum di dalam kebijakan deviden No. BSS/KK-KD/AKT/01;
    f. Apabila di kemudian hari Bank membagikan dividen, Bank memastikan seluruh pemegang saham mendapatkan haknya dan mendapatkan perlakuan yang sama atas dividen yang dibagikan oleh Bank termasuk perlindungan terhadap pemegang saham minoritas dengan mempertimbangkan aspek eksternal dan internal dalam penetapan pembagian dividen, memperhatikan kinerja profitabilitas yang dihasilkan Bank dengan wajar. Pembagian dividen yang dilakukan oleh Bank kepada pemegang saham Bank tidak mengganggu kelangsungan usaha Bank. Hal ini tercantum pada kebijakan deviden No. BSS/KK-KD/AKT/01;
    g. Pemegang saham tidak melakukan intervensi dalam kegiatan operasional Bank serta tidak melakukan intervensi, mengambil keuntungan pribadi atau golongan tertentu, dan memiliki benturan kepentingan dalam menetapkan keputusan strategis
    h. Penyertaan Modal kepada pihak ketiga dilakukan dengan analisa dan pertimbangan yang matang, serta dikomunikasikan dan dimintakan persetujuan terlebih dahulu kepada pengawas Bank;
    i. Pemegang saham Bank terus mendukung pelaksanaan kegiatan usaha Bank yang sehat dan menjaga keberlangsungan usaha Bank sesuai dengan prinsip kehati-hatian, serta bertanggung

13. Shareholder Aspects
    a. The Bank's shareholders support the conduct of business activities and the management of the Bank in a manner that is sound, competitive, and consistent with the principles of prudence and risk management;
    b. The Bank has established Dividend Policy No. BSS/KK-KD/AKT/01, which outlines the dividend determination mechanism and other relevant provisions in accordance with POJK 17 of 2023, including the Bank's considerations regarding dividend distribution, the amount of dividends to be paid, the approval mechanism for dividend distribution proposals, and the policy update period. This is to ensure fair treatment of all shareholders;
    c. Bank Sampoerna is a privately held company with a very limited number of shareholders. The Bank does not have a program related to the ownership and disposal of shares resulting from an ESOP/MSOP that would allow employees;
    d. The Bank has never distributed dividends to shareholders. In the 2025–2027 Business Plan, the Bank also does not plan to distribute dividends;
    e. The Bank has communicated its dividend policy to shareholders; the provisions for periodic review of the dividend policy are set forth in Dividend Policy No. BSS/KK-KD/AKT/01;
    f. Should the Bank distribute dividends in the future, the Bank ensures that all shareholders receive their rights and are treated equally regarding the dividends distributed by the Bank, including the protection of minority shareholders, by taking into account both external and internal factors in determining dividend distributions, while reasonably considering the Bank's profitability performance. The distribution of dividends by the Bank to its shareholders does not disrupt the Bank's business continuity. This is stipulated in Dividend Policy No. BSS/KK-KD/AKT/01;
    g. Shareholders do not interfere in the Bank's operational activities, and does not interfere, seek personal or group gain, or have conflicts of interest in making strategic decisions
    h. Capital investments in third parties are made based on thorough analysis and careful consideration, and are communicated to and require prior approval from the Bank's supervisory body;
    i. The Bank's shareholders continue to support the implementation of the Bank's sound business activities and ensure the Bank's business continuity in accordance with the principle of prudence, and

jawab terhadap penanganan dan penyelesaian permasalahan Bank;

j. Tidak terdapat aksi *insider trading* dan/atau *insider information*, dikarenakan seluruh *dealing* yang terjadi di *dealingroom* dilakukan secara transparan menggunakan infrastruktur dealing yang disertai dengan voice & text recording sehingga apabila diketahui ada kejadian yang melanggar dapat segera diantisipasi;

k. Hak seluruh pemegang saham Bank untuk memperoleh laporan mengenai kondisi keuangan Bank secara tepat waktu, penyelesaian jika pemegang saham tidak setuju terhadap aktivitas dan aksi korporasi Bank, memberikan suara dalam RUPS, serta memperoleh dividen berdasarkan keputusan RUPS sesuai dengan ketentuan peraturan perundang-undangan terlindungi.

14. Penerapan Strategi Anti Fraud termasuk Anti Penyuapan
   a. Bank telah memiliki unit kerja Anti Fraud yang memadai untuk mendukung penerapan strategi anti fraud sesuai dengan Peraturan Otoritas Jasa Keuangan yang dikepalai secara langsung oleh Kepala Divisi Satuan Kerja Manajemen Risiko dibawah Direktur yang membawahi fungsi Kepatuhan dan Manajemen Risiko;
   b. Bank telah memiliki pejabat pada unit kerja Anti Fraud yang berfungsi menangani penerapan Strategi Anti Fraud dan memiliki pengalaman di bidang perbankan serta bersertifikasi di bidang Anti Fraud sejak Januari 2025;
   c. Bank telah memiliki kebijakan dan/atau prosedur dalam pemberian kredit atau pembiayaan yang didasarkan pada prinsip Tata Kelola yang Baik;
   d. Bank telah memiliki struktur organisasi yang memadai terkait penyaluran, persetujuan, dan hapus buku kredit atau pembiayaan dengan menerapkan pemisahan fungsi yang jelas (four eyes principle);
   e. Direksi dan Dewan Komisaris Bank telah memastikan penerapan strategi anti fraud berjalan secara efektif;
   f. Bank telah menyusun dan menyampaikan strategi anti fraud kepada OJK, laporan atau koreksi laporan penerapan strategi anti fraud, dan/atau laporan kejadian fraud berdampak signifikan dengan cakupan sesuai dengan POJK mengenai penerapan strategi anti fraud bagi lembaga jasa keuangan;
   g. Proses pengadaan barang dan jasa, serta pelaksanaan penganggaran dan pengeluaran biaya Bank dilakukan sesuai dengan kebutuhan bank, kebijakan internal Bank dan ketentuan peraturan perundang-undangan serta dilaksanakan dengan memperhatikan Tata Kelola yang Baik pada Bank dan dengan prinsip paling sedikit efisien, efektif, transparan, terbuka, bersaing, adil, dan akuntabel, terlepas dari benturan kepentingan, serta adanya pemisahan fungsi dan kewenangan dalam

are responsible for addressing and resolving the Bank's issues;

j. There is no insider trading and/or use of insider information, as all trading activities conducted in the trading room are implemented transparently using a trading infrastructure equipped with voice and text recording, so that any violations can be promptly addressed;

k. The rights of all Bank shareholders to receive timely reports regarding the Bank's financial condition, to seek resolution if shareholders disagree with the Bank's corporate activities and actions, to vote at the General Meeting of Shareholders (GMS), and to receive dividends based on GMS resolutions in accordance with applicable laws and regulations are protected.

14. Implementation of Anti-Fraud Strategies, including Anti-Bribery
   a. The Bank has established an adequate Anti-Fraud unit to support the implementation of anti-fraud strategies in accordance with Financial Services Authority regulations, headed directly by the Head of the Risk Management Unit under the Director responsible for Compliance and Risk Management;
   b. The Bank has appointed an officer within the Anti-Fraud unit responsible for implementing the Anti-Fraud Strategy, who possesses banking experience and is certified in Anti-Fraud as of January 2025;
   c. The Bank has policies and/or procedures for granting credit or financing based on the principles of Good Governance;
   d. The Bank has an adequate organizational structure in place for the disbursement, approval, and write-off of loans or financing, implementing a clear separation of duties (four-eyes principle);
   e. The Bank's Board of Directors and Board of Commissioners have ensured that the anti-fraud strategy is implemented effectively;
   f. The Bank has formulated and submitted an anti-fraud strategy to the OJK, reports or corrections to reports on the implementation of the anti-fraud strategy, and/or reports on fraud incidents with significant impact, with a scope consistent with the OJK Regulation regarding the implementation of anti-fraud strategies for financial services institutions;
   g. The procurement of goods and services, as well as the Bank's budgeting and expenditure processes, are conducted in accordance with the Bank's needs, internal policies, and applicable laws and regulations, and are performed in accordance with the Bank's principles of good governance and the principles of efficiency, effectiveness, transparency, openness, competitive, fair, and accountable, free from conflicts of interest, with a clear separation

proses pengadaan, serta berpegang pada konsep harga terbaik;

h. Bank telah menerapkan strategi anti fraud secara efektif dengan melakukan pencegahan dan penanganan agar kegiatan usaha Bank tidak dimanfaatkan dalam aktivitas yang terkait dengan tindak pidana dengan mengimplementasikan 4 (empat) pilar yaitu pencegahan; deteksi; investigasi, pelaporan, dan sanksi; serta pemantauan, evaluasi, dan tindak lanjut.

15. Penerapan Keuangan Berkelanjutan
    a. Bank telah menerapkan keuangan berkelanjutan dan menyusun Rencana Aksi Keuangan Berkelanjutan (RAKB) kedalam kegiatan usaha yang dijalankan Bank, serta telah menyampaikan Laporan Rencana Aksi Keuangan Berkelanjutan Tahun 2026 per tanggal 28 November 2025;
    b. Bank telah memiliki struktur organisasi yang memadai untuk mendukung penerapan manajemen risiko, unit kerja yang bertanggung jawab telah ditetapkan untuk mengelola mekanisme identifikasi, evaluasi, dan implementasi strategi mitigasi termasuk risiko terkait iklim;
    c. Bank telah memiliki dan mengalokasikan sebagian dananya sebagai dana tanggung jawab sosial dan lingkungan dalam mendukung kegiatan penerapan keuangan berkelanjutan;
    d. Bank telah melakukan aktivitas yang mengintegrasikan prinsip *Environmental, Social, and Governance* (ESG). Dalam mendukung arah taksonomi nasional, Bank telah melakukan klasifikasi portofolio pembiayaan berdasarkan sektor yang relevan dengan Taksonomi Hijau dan sektor-sektor prioritas keberlanjutan
    e. Bank telah menerapkan keuangan berkelanjutan dalam kegiatan usaha dengan menggunakan prinsip sesuai dengan POJK mengenai penerapan keuangan berkelanjutan bagi lembaga jasa keuangan, emiten, dan perusahaan public;
    f. Bank telah menyusun dan menyajikan Laporan Keberlanjutan (Sustainability Report) untuk periode pelaporan tahun 2024 pada tanggal 29 April 2025, sesuai dengan ketentuan POJK mengenai Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, dengan cakupan yang mencerminkan aspek ekonomi, sosial, lingkungan, serta tata kelola;
    g. Bank secara proaktif telah mengomunikasikan Rencana Aksi Keuangan Berkelanjutan (RAKB) kepada pemegang saham serta seluruh jenjang organisasi sebagai bagian dari penguatan tata kelola dan manajemen perubahan menuju praktik keuangan berkelanjutan;
    h. Bank telah melaksanakan Rencana Aksi Keuangan Berkelanjutan (RAKB) secara efektif dan terstruktur sesuai dengan kebijakan internal serta ketentuan peraturan perundang-undangan yang berlaku;

of functions and authorities in the procurement process, and adhering to the concept of best value;

h. The Bank has effectively implemented an anti-fraud strategy by taking preventive and corrective measures to ensure that the Bank's business operations are not exploited for criminal activities, through the implementation of four pillars: prevention; detection; investigation, reporting, and sanctions; and monitoring, evaluation, and follow-up.

15. Implementation of Sustainable Finance
   a. The Bank has implemented sustainable finance and developed a Sustainable Finance Action Plan; into the business activities performed by the Bank, and has submitted the 2026 Sustainable Finance Action Plan Report as of November 28, 2025;
   b. The Bank has an adequate organizational structure to support the implementation of risk management, and a dedicated unit has been established to manage the mechanisms for identifying, assessing, and implementing mitigation strategies, including those related to climate risk;
   c. The Bank has set aside a portion of its funds as social and environmental responsibility funds to support sustainable finance activities;
   d. The Bank has organized activities that integrate Environmental, Social, and Governance (ESG) principles. In support of the national taxonomy framework, the Bank has classified its financing portfolio based on sectors relevant to the Green Taxonomy and priority sustainability sectors
   e. The Bank has implemented sustainable finance in its business operations by applying principles in accordance with the OJK Regulation on the implementation of sustainable finance for financial services institutions, issuers, and public companies;
   f. The Bank has prepared and presented a Sustainability Report for the 2024 reporting period on April 29, 2025, in accordance with the provisions of the POJK regarding the Implementation of Sustainable Finance for Financial Services Institutions, with a scope that reflects economic, social, environmental, and governance aspects;
   g. The Bank has proactively communicated its Sustainable Finance Action Plan to shareholders and all levels of the organization as part of efforts to strengthen governance and manage the transition toward sustainable finance practices;
   h. The Bank has implemented the Sustainable Finance Action Plan (RAKB) effectively and in a structured manner in accordance with internal policies and applicable laws and regulations;

i. Proses pengadaan, penganggaran dan pengeluaran dana tanggung jawab sosial dan lingkungan telah dilakukan sesuai dengan kebijakan internal Bank dan ketentuan peraturan perundang-undangan. Ketentuan mengenai pelaksanaan kegiatan tanggung jawab sosial perusahaan Bank diatur dalam SOP *Corporate Communications & Investor Relations* nomor BSS/SPO-CCIR/CCIR/03;

j. Bank telah menerapkan, memperhatikan, dan mengintegrasikan nilai lingkungan, sosial, dan tata kelola dalam mendukung pelaksanaan praktik bisnis dan strategi investasi sesuai dengan pedoman SOP RAKB yang sudah diberlakukan;

k. Direksi, Dewan Komisaris, serta unit kerja terkait di Bank memiliki peran dan tanggung jawab yang jelas dalam pengelolaan risiko terkait iklim. Peran tersebut telah tertuang secara eksplisit dalam laporan *Climate Risk Management System* (CRMS) yang disampaikan kepada OJK, sebagai bagian dari komitmen tata kelola yang mendukung integrasi risiko iklim ke dalam manajemen risiko secara menyeluruh;

l. Bank telah melakukan identifikasi, monitoring dan mengelola risiko keuangan terkait iklim yang dapat mempengaruhi kondisi keuangan Bank. Telah dilakukan *stress tess* terkait climate untuk jangka waktu pendek sampai dengan jangka waktu panjang sesuai dengan skenario dari panduan CRMS OJK;

m. Sebagai pemenuhan komitmen Bank dalam mengintegrasikan aspek lingkungan, sosial, dan tata kelola (LST) ke dalam praktik bisnis dan strategi keberlanjutan jangka panjang, bank berupaya efektif dan konsisten menerapkan prinsip keuangan berkelanjutan, termasuk pengalokasian dana tanggung jawab sosial dan lingkungan (TJSL) yang selaras dengan POJK mengenai penerapan keuangan berkelanjutan bagi lembaga jasa keuangan, emiten, dan perusahaan public;

n. Bank telah menyusun Rencana Aksi Keuangan Berkelanjutan yang menggambarkan rencana kegiatan usaha dan program kerja jangka pendek (satu tahun) dan jangka panjang (lima tahun) dengan memuat target waktu penerapan yang terukur serta telah disampaikan kepada Otoritas Jasa Keuangan secara lengkap dan tepat waktu sesuai dengan ketentuan yang berlaku. Laporan Rencana Aksi Keuangan Berkelanjutan tahun 2026 telah disampaikan kepada Regulator per tanggal 28 November 2025;

o. Bank senantiasa mengedepankan prinsip tata kelola yang baik (Good Corporate Governance) dalam mengelola risiko terkait perubahan iklim melalui pelibatan aktif Direksi, Dewan Komisaris, dan unit kerja terkait dalam proses identifikasi, evaluasi, serta pemantauan risiko iklim secara terstruktur dan berbasis data;

i. The procurement, budgeting, and expenditure of funds for social and environmental responsibility have been carried out in accordance with the Bank's internal policies and applicable laws and regulations. Provisions regarding the implementation of the Bank's corporate social responsibility activities are regulated in the Corporate Communications & Investor Relations SOP number BSS/SPO-CCIR/CCIR/03;

j. The Bank has implemented, taken into account, and integrated environmental, social, and governance (ESG) values to support the implementation of business practices and investment strategies in accordance with the Sustainable Finance Action Plan SOP guidelines that have been enacted;

k. The Board of Directors, Board of Commissioners, and relevant units within the Bank have clear roles and responsibilities in managing climate-related risks. These roles are explicitly outlined in the Climate Risk Management System (CRMS) report submitted to the OJK, as part of the governance commitment supporting the integration of climate risks into comprehensive risk management;

l. The Bank has identified, monitored, and managed climate-related financial risks that could affect the Bank's financial condition. Climate-related stress tests have been conducted for both the short and long term in accordance with the scenarios outlined in the OJK's CRMS guidelines;

m. In fulfillment of the Bank's commitment to integrating environmental, social, and governance (ESG) aspects into its business practices and long-term sustainability strategy, the Bank strives to effectively and consistently apply the principles of sustainable finance, including the allocation of funds for social and environmental responsibility (TJSL) in accordance with the OJK Regulation on the implementation of sustainable finance for financial services institutions, issuers, and public companies;

n. The Bank has developed a Sustainable Finance Action Plan that outlines its business activities and work programs for the short term (one year) and long term (five years), including measurable implementation timelines, and has submitted it to the Financial Services Authority in full and on time in accordance with applicable regulations. The 2026 Sustainable Finance Action Plan report was submitted to the Regulator on November 28, 2025;

o. The Bank consistently prioritizes the principles of good corporate governance in managing climate-related risks through the active involvement of the Board of Directors, the Board of Commissioners, and relevant work units in the structured, data-driven process of identifying, evaluating, and monitoring climate-related risks;

p. Perencanaan kegiatan tanggung jawab sosial perusahaan dilakukan dengan mempertimbangkan prinsip akuntabilitas dan transparansi agar kegiatan yang dilakukan sesuai regulasi, mencegah konflik kepentingan, serta memastikan fokus pada dampak sosial dan lingkungan yang optimal.

16. Penerapan Tata Kelola dalam Kelompok Usaha Bank

    Bank belum memiliki kewajiban menerapkan tata kelola dalam kelompok usaha bank karena Bank bukan sebagai perusahaan induk maupun sebagai anggota kelompok usaha Bank.

Memperhatikan kesimpulan tersebut di atas, dapat disampaikan kekuatan dan kelemahan pelaksanaan implementasi penerapan tata kelola (GCG) di Bank Sahabat Sampoerna yaitu sebagai berikut:

Kekuatan Pelaksanaan GCG :

1. Governance Structure
   Guna mendukung proses pelaksanaan prinsip tata kelola (GCG) pada setiap lini organisasi dan operasional yang bertujuan untuk menghasilkan *outcome* yang sesuai dengan harapan *stakeholders* Bank, secara umum Bank telah memiliki struktur dan infrastruktur Tata Kelola yang lengkap dan telah sesuai dengan ketentuan yang berlaku.

2. Governance Process
   a. Pemegang saham,Dewan Komisaris,Direksi dan seluruh jajaran dalam lini organisasi memiliki komitmen yang tinggi dalam mendorong dan menjunjung tinggi budaya kepatuhan dan budaya risiko , integritas, keadilan dan transparansi dalam setiap pelaksanaan tugas dan tanggung jawabnya;
   b. Pemegang saham, Dewan Komisaris dan Direksi telah melaksanakan Prinsip Tata Kelola secara konsisten melalui komunikasi yang transparan secara rutin terkait kebijakan, strategi dan performance Bank serta adanya penerapan reward and punishment system berbasis meritokrasi kepada seluruh pegawai;
   c. Pelaksanaan implementasi penerapan tata kelola (GCG) secara umum telah sesuai dengan ketentuan, hal ini tercermin dari terpenuhinya pelaksanaan kewajiban Bank kepada Regulator serta pemenuhan pelaksanaan kewajiban kepada segenap *stakeholders*.

3. Governance Outcome
   Secara umum *outcome* penerapan tata kelola (GCG) di Bank Sahabat Sampoerna tercapai dengan baik, hal ini tercermin dari pencapaian Bank baik secara finansial maupun non finansial pada realisasi Rencana Bisnis Bank yang telah disampaikan kepada Regulator dan seluruh *stakeholders* Bank.

p. Planning for corporate social responsibility activities is conducted with consideration of the principles of accountability and transparency to ensure that activities comply with regulations, prevent conflicts of interest, and ensure a focus on optimal social and environmental impacts.

16. Implementation of Corporate Governance within the Bank's Business Group
    The Bank is not yet required to implement corporate governance within its banking group because the Bank is neither a parent company nor a member of the banking group.

In light of the above conclusions, the strengths and weaknesses of the implementation of corporate governance (GCG) at Bank Sahabat Sampoerna are as follows:

Strengths of GCG Implementation:

1. Governance Structure
   To support the implementation of corporate governance (GCG) principles across all organizational and operational levels—aimed at producing outcomes aligned with the Bank's stakeholders' expectations—the Bank generally possesses a comprehensive governance structure and infrastructure that complies with applicable regulations.

2. Governance Process
   a. Shareholders, the Board of Commissioners, the Board of Directors, and all levels of the organization are deeply committed to fostering and upholding a culture of compliance and risk management, integrity, fairness, and transparency in the performance of their duties and responsibilities;
   b. Shareholders, the Board of Commissioners, and the Board of Directors have consistently implemented Corporate Governance Principles through regular transparent communication regarding the Bank's policies, strategies, and performance, as well as the implementation of a merit-based reward and punishment system for all employees;
   c. The implementation of good corporate governance (GCG) is generally in accordance with regulations, as reflected in the Bank's fulfillment of its obligations to regulators and to all stakeholders.

3. Governance Outcome
   In general, the outcomes of the implementation of good corporate governance (GCG) at Bank Sahabat Sampoerna have been successfully achieved, as reflected in the Bank's financial and non-financial performance in the implementation of the Bank's Business Plan, which has been submitted to the regulator and all of the Bank's stakeholders.

Kelemahan Pelaksanaan GCG

1. Bank terus memastikan pelaksanaan transaksi dengan pihak yang memiliki hubungan istimewa sesuai dengan kebijakan dan prosedur yang disusun . Setiap Transaksi Bank dengan pihak yang memiliki hubungan istimewa agar dilaksanakan secara wajar (*arm's length principle*). Saat ini, Bank sedang dalam proses finalisasi SOP Pihak Berelasi yang mengatur transaksi dengan pihak terkait, tidak terbatas pada transaksi kredit atau pembiayaan, namun juga mencakup eksposur dan transaksi lainnya;
2. Hingga semester II tahun 2025, terdapat denda yang dikenakan oleh Regulator dari periode Januari sampai dengan Desember 2025 sebesar Rp32.443.861 mayoritas dikarenakan adanya sanksi Kewajiban Membayar atas Koreksi di Luar Batas Waktu Penyampaian Laporan Bulanan Bank Umum Terintegrasi (LBUT);
3. Laporan profil risiko Bank telah memuat hasil identifikasi, pengukuran, pemantauan, dan pengendalian terkait *country risk* dan *transfer risk*. Bank juga telah menyampaikan laporan profil risiko secara triwulanan kepada OJK dengan peringkat risiko *Low to Moderate* .Berdasarkan profil risiko, secara komposit peringkat Risiko Kredit Bank masih pada peringkat Moderate, Bank terus melakukan berbagai upaya perbaikan untuk meningkatkan kualitas dan efektivitas penerapan manajemen risiko khususnya risiko kredit, agar sejalan dengan risk appetite internal Bank;
4. Direksi telah melaksanakan RBB secara efektif. Realisasi Rencana Bisnis Bank (RBB) pada Semester II tahun 2025 secara keseluruhan dinilai cukup baik dengan beberapa rasio yang masih berada dibawah target yang ditetapkan, diantaranya pencapaian ROA, ROE, BOPO, NIM, Rasio beban overhead terhadap pendapatan bersih kegiatan utama, rasio debitur inti terhadap total kredit dan rasio deposan inti terhadap total DPK;

Bank telah memiliki kerangka kebijakan dan prosedur manajemen risiko serta penetapan limit risiko yang memadai secara umum termasuk perencanaan implementasi strategi untuk memitigasi potensi dampak risiko terkait iklim terhadap keberlangsungan bisnis . Namun, untuk aspek pengelolaan risiko terkait iklim, Bank belum memiliki kebijakan yang tertuang secara formal dan sedang dalam proses penyempurnaan melalui revisi Kebijakan Umum Manajemen Risiko yang akan memasukkan aspek pengelolaan risiko iklim secara lebih komprehensif .

Weaknesses in the Implementation of GCG

1. *The Bank continues to ensure that transactions with related parties are conducted in accordance with established policies and procedures. All transactions between the Bank and related parties must be conducted on an arm's-length basis. Currently, the Bank is in the process of finalizing its Related Party SOP, which governs transactions with related parties not limited to credit or financing transactions, but also covers exposures and other transactions;*
2. *As of the second semester of 2025, the regulator has imposed fines totaling Rp32,443,861 for the period from January through December 2025, primarily due to penalties for late submission of monthly reports by integrated commercial banks (LBUT);*
3. *The Bank's risk profile report includes the results of the identification, measurement, monitoring, and control of country risk and transfer risk. The Bank has also submitted quarterly risk profile reports to the OJK with a risk rating of Low to Moderate. Based on the risk profile, the Bank's composite credit risk rating remains at Moderate. The Bank continues to undertake various improvement efforts to enhance the quality and effectiveness of risk management implementation, particularly regarding credit risk, to align with the Bank's internal risk appetite;*
4. *The Board of Directors has effectively implemented the Business Plan. The overall implementation of the Bank's Business Plan (RBB) in the second half of 2025 is considered satisfactory, although several ratios remain below the set targets, including ROA, ROE, BOPO, NIM, the ratio of overhead expenses to net income from core operations, the ratio of core debtors to total loans, and the ratio of core depositors to total third-party funds (DPK);*

The Bank has established a framework of risk management policies and procedures, as well as generally adequate risk limits, including a strategic implementation plan to mitigate the potential impact of climate-related risks on business continuity. However, regarding climate-related risk management, the Bank does not yet have a formally documented policy and is currently in the process of refining it through a revision of the General Risk Management Policy, which will incorporate climate risk management aspects more comprehensively.

Rapat Umum Pemegang Saham

Annual General Meeting of Shareholders

Rapat Umum Pemegang Saham (RUPS) merupakan organ utama yang berfungsi sebagai pengambilan keputusan tertinggi dalam Bank dan memiliki wewenang yang tidak dimiliki oleh Dewan Komisaris maupun Direksi. RUPS juga berfungsi sebagai 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 berwenang untuk mengangkat 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.

The General Meeting of Shareholders (GMS) is the primary governing body that serves as the Bank's highest decision-making authority and possesses powers not held by either the Board of Commissioners or the Board of Directors. The GMS also serves as a forum for shareholders to make important and strategic decisions regarding the Bank's long-term sustainability, in accordance with the provisions of the Articles of Association and applicable laws and regulations, including approving amendments to the Articles of Association, approving the annual report, and distributing dividends. The GMS also has the authority to appoint and dismiss members of the Board of Commissioners and the Board of Directors, delegate authority to the Board of Commissioners and the Board of Directors, and make decisions regarding the Bank's actions that require shareholder approval.

Hak dan Wewenang RUPS

RUPS mempunyai hak dan wewenang, antara lain untuk:

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 pengurusan 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.

Rights and Authorities of the General Meeting of Shareholders

The General Meeting of Shareholders has the rights and authorities, to:

1. *Approve and accept the Annual Report from the Bank's Board of Directors, which has been reviewed by the Board of Commissioners;*
2. *Decide on the use of the Bank's profits;*
3. *Grant full discharge and release of liability to members of the Board of Commissioners and the Board of Directors for the management and supervision implemented during the current fiscal year;*
4. *Appoint and elect the Board of Commissioners and the Board of Directors;*
5. *Grant approval if the company intends to transfer, dispose of, or pledge as collateral for debt all or more than 50% of the Bank's net assets, whether in a single transaction and/or in several separate or interrelated transactions;*
6. *Approve the transfer of the Bank's shares; and*
7. *Approve amendments to the Articles of Association.*

Hak, Tanggung Jawab, dan Wewenang Pemegang Saham

Hak Pemegang Saham

Pemegang saham memiliki sejumlah hak dalam pelaksanaan RUPS sesuai ketentuan yang berlaku, di antaranya:

1. Menghadiri dan memiliki hak suara dalam RUPS;

Rights, Responsibilities, and Authorities of Shareholders

Shareholders' Rights

Shareholders have certain rights in the conduct of the General Meeting of Shareholders in accordance with applicable regulations, including:

1. *Attending and ecercising voting rights at the General Meeting of Shareholders;*

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 eputusa saham yang dimiliki; dan
6. Mendapatkan penawaran atas saham yang akan dialihkan oleh Pemegang Saham lainnya.

2. Receiving dividend payments and the remaining assets from liquidation;
3. Appointing and removing members of the Board of Commissioners and the Board of Directors;
4. Approving the Annual and Financial Reports submitted by the Board of Directors and the Supervisory Report submitted by the Board of Commissioners, as well as granting discharge and release to the Board of Commissioners and the Board of Directors to the extent that their actions are reflected and reported in the Annual and Financial Reports;
5. Transferring rights to shares held; and
6. Receiving offers for shares to be transferred by other Shareholders.

Tanggung Jawab Pemegang Saham

Berdasarkan ketentuan yang berlaku, 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.

Shareholders' Responsibilities

In accordance with applicable regulations, shareholders have the responsibility to:
1. Hold the Board of Commissioners and the Board of Directors accountable for the supervision and management of the Bank; and
2. Liable for the amount of funds deposited with the Bank in the event that the Bank becomes insolvent.

Wewenang Pemegang Saham

Dalam menjalankan fungsinya, pemegang saham memiliki kewenangan untuk:
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; dan
7. Menyetujui jumlah remunerasi Dewan Komisaris dan Direksi.

Shareholders' Authorities

In performing their functions, shareholders have the authority to:
1. Appoint and remove the Board of Commissioners and the Board of Directors;
2. Approve the Annual and Financial Reports submitted by the Board of Directors and the Supervisory Report submitted by the Board of Commissioners, as well as grant discharge and release to the Board of Commissioners and the Board of Directors to the extent that their actions are reflected and reported in the Annual Report and Financial Statements;
3. Approve the transfer or pledging of more than 50% of the Bank's assets.
4. Approve the transfer of shares by Shareholders;
5. Approving the Bank's mergers, acquisitions, and liquidations;
6. Approving the distribution of dividends; and
7. Approving the remuneration amounts for the Board of Commissioners and the Board of Directors.

Mekanisme Pelaksanaan RUPS

Pelaksanaan RUPS di Bank mengacu kepada Undang-Undang Republik Indonesia No. 40 Tahun 2007 tentang Perseroan Terbatas dan Pasal 8 Anggaran Dasar Bank. Berdasarkan ketentuan tersebut, pelaksanaan RUPS terbagi atas 2 (dua) jenis, yaitu RUPS Tahunan dan RUPS Luar Biasa.

Mechanism for Conducting the GMS

The conduct of the General Meeting of Shareholders at the Bank is governed by Law of the Republic of Indonesia No. 40 of 2007 on Limited Liability Companies and Article 8 of the Bank's Articles of Association. Pursuant to these provisions, the General Meeting of Shareholders is divided into two types: the Annual General Meeting of Shareholders and the Extraordinary General Meeting of Shareholders.

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. Selain itu, dalam melaksanakan RUPS, pemegang saham dapat mengambil eputusan 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.

The Annual General Meeting of Shareholders is held at least once a year or no later than six months after the end of the fiscal year. Meanwhile, an Extraordinary General Meeting of Shareholders is convened to discuss important and urgent matters, with the timing of the meeting determined according to the needs of the shareholders, the Board of Commissioners, or the Bank's Board of Directors. Additionally, in conducting the GMS, Shareholders may make binding decisions outside of a general meeting of shareholders, provided that all shareholders with voting rights give their written consent by signing the relevant proposal, commonly referred to as a Circular Resolution.

Pelaksanaan RUPS Tahun 2025

Sepanjang tahun 2025, Bank Sahabat Sampoerna telah menyelenggarakan RUPS sebanyak 3 (tiga) kali yang terdiri dari 1(satu) kali RUPS Tahunan dan RUPS Luar Biasa sebanyak 2 (dua) kali. Seluruh RUPS Bank dilakukan secara sirkuler dan telah ditandatangani oleh seluruh pemegang saham.

GMS Implementation in 2025

Throughout 2025, Bank Sahabat Sampoerna held three (3) General Shareholders' Meetings, consisting of one (1) Annual General Meeting of Shareholders and two (2) Extraordinary General Meeting of Shareholders. All of the Bank's General Meeting of Shareholders were conducted by written resolution and were signed by all shareholders.

RUPS Tahunan 2025

Pada tanggal 19 Juni 2025, Bank telah menyelenggarakan RUPS Tahunan secara sirkuler dan telah ditandatangani oleh seluruh Pemegang Saham yang mewakili 1.690.302.571saham atau 100% dari seluruh saham yang ditempatkan dan disetor penuh sehingga telah memenuhi ketentuan kuorum RUPS pada Pasal 10 Anggaran Dasar Bank. Pelaksanaan RUPS Tahunan ini telah dicatatkan dalam Akta Notaris No. 38 tanggal 16 Juli 2025. Adapun eputusan dan realisasi RUPS Tahunan 2025 dapat dilihat sebagai berikut:

2025 Annual General Meeting of Shareholders

On June 19, 2025, the Bank held an Annual GMS by circular resolution, which was signed by all shareholders representing 1,690,302,571 shares, or 100% of all issued and fully paid-up shares, thereby fulfilling the quorum requirements for the GMS as stipulated in Article 10 of the Bank's Articles of Association. The conduct of this Annual General Meeting was recorded in Notarial Deed No. 38 dated July 16, 2025. The resolutions and outcomes of the 2025 Annual General Meeting are as follows:

Agenda	Keputusan RUPS *GMS Resolutions*	Realisasi *Realization*
Agenda I	Menyetujui Laporan Direksi Perseroan *To approve the Company's Board of Directors' Report*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*
Agenda II	Menyetujui Laporan Dewan Komisaris Perseroan *To approve the Company's Board of Commissioners' Report*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*
Agenda III	Menyetujui dan mengesahkan Laporan Tahunan Perseroan termasuk Laporan Keuangan untuk tahun buku yang berakhir pada tanggal 31 Desember 2024. *To approve and ratify the Company's Annual Report, including the Financial Statements for the fiscal year ending December 31, 2024.*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*
Agenda IV	Menyetujui usulan Direksi untuk menetapkan seluruh keuntungan yang diperoleh Perseroan pada tahun buku 2024 sebagai Laba Ditahan (*Retained Earning*). *To approve the Board of Directors' proposal to allocate all profits earned by the Company in the 2024 fiscal year as Retained Earnings.*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*
Agenda V	Menerima usulan Direksi untuk meningkatkan dana cadangan umum dari laba tahun buku 2024. sebagaimana diatur dalam Anggaran Dasar yaitu sebesar Rp500.000.000 (lima ratus juta Rupiah). *To approve the Board of Directors' proposal to increase the general reserve fund from the profits of the 2024 fiscal year, as stipulated in the Articles of Association, to the amount of Rp500,000,000 (five hundred million Rupiah).*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*

Agenda	Keputusan RUPS *GMS Resolutions*	Realisasi *Realization*
Agenda VI	Menyetujui untuk memberikan kewenangan kepada Dewan Komisaris untuk menetapkan paket remunerasi anggota Direksi dan Dewan Komisaris. *To approve and grant authority to the Board of Commissioners to determine the remuneration packages for members of the Board of Directors and the Board of Commissioners.*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*
Agenda VII	Menyetujui untuk memberikan kewenangan kepada Dewan Komisaris untuk menunjuk Jasa Kantor Akuntan Publik yang akan digunakan sebagai Akuntan Publik Perseroan untuk tahun buku 2025. *To approve and grant authority to the Board of Commissioners to appoint a Public Accounting Firm to serve as the Company's Public Accountant for the 2025 fiscal year.*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*

RUPS Luar Biasa 2025

2025 Extraordinary General Meeting of Shareholders

1. Pada tanggal 18 Januari 2025, Bank telah menyelenggarakan RUPS Luar Biasa secara sirkuler dan telah ditandatangani oleh seluruh Pemegang Saham yang mewakili 1.690.302.571 saham atau 100% dari seluruh saham yang ditempatkan dan disetor penuh sehingga telah memenuhi ketentuan kuorum RUPS pada Pasal 10 Anggaran Dasar Bank. Pelaksanaan RUPS Luar Biasa ini telah dicatatkan dalam Akta Notaris No. 14 tanggal 15 Mei 2025. Adapun keputusan dan realisasi RUPS Luar Biasa ini dapat dilihat sebagai berikut:

1. On January 18, 2025, the Bank held an Extraordinary General Meeting of Shareholders by written proxy, which was signed by all Shareholders representing 1,690,302,571 shares, or 100% of all issued and fully paid-up shares, thereby satisfying the quorum requirements for the General Meeting of Shareholders as stipulated in Article 10 of the Bank's Articles of Association. The conduct of this Extraordinary General Meeting of Shareholders was recorded in Notarial Deed No. 14 dated May 15, 2025. The resolutions and outcomes of this Extraordinary General Meeting of Shareholders are as follows:

Agenda	Keputusan RUPS *GMS Resolutions*	Realisasi *Realization*
Agenda	Menyetujui perubahan dan pernyataan kembali seluruh isi Anggaran Dasar dalam rangka penyesuaian dengan Peraturan Otoritas Jasa Keuangan Nomor 17 Tahun 2023 (dua ribu dua puluh tiga) Tentang Penerapan Tata Kelola Bagi Bank Umum merujuk pada Lampiran --Keputusan Di Luar Rapat Umum Pemegang Saham. *To approve the amendments and restatement of the entire contents of the Articles of Association in order to comply with Financial Services Authority Regulation No. 17 of 2023 (two thousand twenty-three) on the Implementation of Corporate Governance for Commercial Banks, as set forth in the Appendix—Circular Resolution of the General Meeting of Shareholders.*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*

2. Pada tanggal 25 November 2025, Bank telah menyelenggarakan RUPS Luar Biasa secara sirkuler dan telah ditandatangani oleh seluruh Pemegang Saham yang mewakili 1.690.302.571 saham atau 100% dari seluruh saham yang ditempatkan dan disetor penuh sehingga telah memenuhi ketentuan kuorum RUPS pada Pasal 10 Anggaran Dasar Bank. Pelaksanaan RUPS Luar Biasa ini telah dicatatkan dalam Akta Notaris No. 66 tanggal 17 Desember 2025. Adapun keputusan dan realisasi RUPS Luar Biasa ini dapat dilihat sebagai berikut:

2. On November 25, 2025, the Bank held an Extraordinary General Meeting of Shareholders by written resolution, which was signed by all Shareholders representing 1,690,302,571 shares, or 100% of all issued and fully paid-up shares, thereby satisfying the quorum requirements for the General Meeting of Shareholders as stipulated in Article 10 of the Bank's Articles of Association. The conduct of this Extraordinary General Meeting of Shareholders was recorded in Notarial Deed No. 66 dated December 17, 2025. The resolutions and outcomes of this Extraordinary General Meeting of Shareholders are as follows:

Agenda	Keputusan RUPS *GMS Resolutions*	Realisasi *Realization*
Agenda I	Menyetujui Pengunduran Diri Anggota Direksi Perseroan *To approve of the Resignation of a Member of the Company's Board of Directors*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*
Agenda II	Menyetuju Pengangkatan Anggota Direksi Perseroan *To approve of the Appointment of a Member of the Company's Board of Directors*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*

Agenda	Keputusan RUPS *GMS Resolutions*	Realisasi *Realization*
Agenda III	Menyetujui Laporan Rencana Aksi Pemulihan PT Bank Sahabat Sampoerna pada November 2025 *To approve the Recovery Action Plan Report of PT Bank Sahabat Sampoerna for November 2025*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*

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:

GMS Implementation in 2024

Throughout 2024, Bank Sahabat Sampoerna 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 General Meetings of Shareholders were conducted by written resolution and were signed by all Shareholders. Each General Meeting of Shareholders held by the Bank is described as follows:

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:

2024 Annual General Meeting of Shareholders

Bank Sahabat Sampoerna held its Annual General Meeting of Shareholders by written resolution, which was signed by all shareholders representing 1,690,302,571 shares, or 100% of all issued and fully paid-up shares, thereby fulfilling the quorum requirements for the Annual General Meeting of Shareholders as stipulated in Article 10 of the Articles of Association. The conduct of this Annual General Meeting has been recorded in Notarial Deed No. 26 dated July 16, 2024. The resolutions and outcomes of the 2024 Annual General Meeting are as follows:

Agenda	Keputusan RUPS *GMS Resolutions*	Realisasi *Realization*
Agenda 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). *To accept and approve the Company's Board of Directors' Report regarding the results of the Company's business activities for the fiscal year ending on December 31, 2023 (thirty-first of December two thousand twenty-three).*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*
Agenda II	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). *To accept and approve the Company's Board of Directors' Report regarding the results of the Company's business activities for the fiscal year ending on December 31, 2023 (thirty-first of December two thousand twenty-three).*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*
Agenda III	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. *To approve and ratify the Company's Annual Report, including the Financial Statements for the fiscal year ending on December 31, 2023, which have been audited by the Public Accounting Firm TANUBRATA SUTANTO FAHMI BAMBANG, and PARTNERS, and to accept the full accountability of the Company's Board of Directors and Board of Commissioners, as well as to release the Company's Board of Directors and Board of Commissioners from all legal liability in managing and operating the Company ("acquit et de charge") for the 2023 fiscal year (two thousand twenty-three) to the extent that such actions are set forth in the Company's Annual Report and do not violate applicable laws and regulations.*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*

Agenda	Keputusan RUPS *GMS Resolutions*	Realisasi *Realization*
Agenda IV	Menyetujui usulan Direksi untuk menetapkan seluruh keuntungan yang diperoleh Perseroan pada tahun buku 2023 (dua ribu dua puluh tiga) sebagai Laba Ditahan (*Retained Earning*). *To approve the Board of Directors' proposal to allocate all profits earned by the Company in the 2023 fiscal year (two thousand twenty-three) as Retained Earnings.*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*
Agenda V	Menerima usulan Direksi untuk meningkatkan dana cadangan umum dari laba tahun buku 2023 (dua ribu dua puluh tiga). *To accept the Board of Directors' proposal to increase the general reserve fund from the profits of the 2023 fiscal year (two thousand twenty-three).*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*
Agenda VI	Menyetujui untuk memberikan kewenangan kepada Dewan Komisaris untuk mendapatkan paket remunerasi anggota Direksi dan Dewan Komisaris. *To approve and grant authority to the Board of Commissioners to determine the remuneration packages for members of the Board of Directors and the Board of Commissioners.*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*
Agenda VII	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 melakukan tugas pengawasan terhadap jalannya kegiatan Perseroan. *To approve and grant authority to the Board of Commissioners to appoint a Public Accounting Firm to serve as the Company's Public Accountant for the fiscal year 2024 (two thousand twenty-four), solely because the Company's Shareholders believe that the Board of Commissioners has a thorough understanding of the Company due to its oversight of the Company's operations.*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*

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 General Meeting of Shareholders, March 26, 2024

Bank Sahabat Sampoerna held an Extraordinary General Meeting of Shareholders by written resolution, which was signed by all shareholders representing 1,690,302,571 shares, or 100% of all issued and fully paid-up shares, thereby fulfilling the quorum requirements for the General Meeting of Shareholders as stipulated in Article 10 of the Articles of Association. The conduct of this Extraordinary General Meeting of Shareholders has been recorded in Notarial Deed No. 30 dated June 24, 2024. The resolutions and outcomes of the Extraordinary General Meeting of Shareholders held on March 26, 2024, are as follows:

Agenda	Keputusan RUPS *GMS Resolutions*	Realisasi *Realization*
Agenda 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. *To approve the amendment to Article 3 of the Company's Articles of Association to comply with the provisions of Government Regulation No. 5 of 2021 regarding the Implementation of Risk-Based Business Licensing and Central Statistics Agency Regulation No. 2 of 2020 regarding the Standard Classification of Indonesian Economic Activities.*	Terealisasi dan telah dilaksanakan sesuai keputusan RUPS. *Implemented and executed in accordance with the GMS resolution.*

Dewan Komisaris

Board of Commissioners

Dewan Komisaris merupakan organ perusahaan yang bertugas dan bertanggung jawab secara kolektif untuk melakukan pengawasan dan pemberian nasihat kepada Direksi. Selain itu, Dewan Komisaris juga senantiasa memastikan pelaksanaan GCG di seluruh tingkatan atau jenjang organisasi sudah berjalan efektif sesuai dengan prinsip dan peraturan yang berlaku guna memastikan aktivitas Bank dapat berjalan secara efektif.

The Board of Commissioners is a corporate governing body tasked with and collectively responsible for supervising and advising the Board of Directors. In addition, the Board of Commissioners also ensures that the implementation of good corporate governance (GCG) at all levels of the organization is executed effectively in accordance with applicable principles and regulations to ensure that the Bank's operations run effectively.

Komposisi Dewan Komisaris Tahun 2025

Selama tahun 2025, susunan dan komposisi Dewan Komisaris Bank tidak mengalami perubahan. Komposisi Dewan Komisaris Bank terdiri dari 4 (empat) orang, dimana 2 (dua) di antaranya adalah Komisaris Independen. Susunan dan komposisi tersebut telah sesuai dengan ketentuan dari regulator yang mengatur komposisi anggota Komisaris Independen paling kurang 50% dari jumlah anggota Dewan Komisaris.

Seluruh anggota Dewan Komisaris Bank Sahabat Sampoerna diangkat dan diberhentikan berdasarkan keputusan RUPS serta mempertimbangkan usulan dari PT Sampoerna Investama selaku pemegang saham pengendali. 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 for 2025

Throughout 2025, the composition of the Bank's Board of Commissioners remained unchanged. The Board of Commissioners consists of 4 (four) members, 2 (two) of whom are Independent Commissioners. This composition complies with regulatory requirements stipulating that Independent Commissioners must constitute at least 50% of the total members of the Board of Commissioners.

All members of the Board of Commissioners of Bank Sahabat Sampoerna are appointed and dismissed based on a resolution of the General Meeting of Shareholders and taking into account proposals from PT Sampoerna Investama as the controlling shareholder. The Bank also ensures that all members of the Board of Commissioners meet the criteria in accordance with the provisions of the Articles of Association and the General Corporate Governance Policy (GCG), and have passed the fit and proper test of the Financial Services Authority.

Adapun komposisi anggota Dewan Komisaris Bank Sahabat Sampoerna sepanjang tahun 2025 adalah sebagai berikut:

The composition of the Board of Commissioners of Bank Sahabat Sampoerna for the year 2025 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 by Bank Indonesia/Financial Services Authority*	**Periode Jabatan** *Term of Office*
Budi Setiawan Halim	Komisaris Utama *President Commissioner*	• 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 Resolution of the Extraordinary General Meeting of Shareholders dated May 26, 2023;* • *2020–2023: Circular Resolution of the Extraordinary General Meeting of Shareholders on May 28, 2020;* • *2017–2020: Circular Resolution of the Extraordinary General Meeting of Shareholders on May 22, 2017;* • *2015–2017: Resolution of the Extraordinary General Meeting of Shareholders dated January 28, 2015; and* • *2012–2015: Resolution of the Extraordinary General Meeting of Shareholders in February 2012;*	No. 14/8/GBI/DPIP/ Rahasia tanggal 18 Januari 2012. *No. 14/8/GBI/DPIP/ Rahasia dated January 18, 2012.*	2023-2026
Harry Mulyadi Santoso	Komisaris *Commissioner*	• 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 Resolution of the Extraordinary General Meeting of Shareholders dated May 26, 2023;* • *2020–2023: Circular Resolution of the Extraordinary General Meeting of Shareholders dated May 28, 2020; and* • *2019–2020: Shareholders' Circular Resolution 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*	• 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 Resolution of the Extraordinary General Meeting of Shareholders dated May 26, 2023;* • *2020–2023: Circular Resolution of the Extraordinary General Meeting of Shareholders dated May 28, 2020;* • *2017–2020: Circular Resolution of the Extraordinary General Meeting of Shareholders on May 22, 2017; and* • *2015–2017: Resolution of the Extraordinary General Meeting of Shareholders dated January 28, 2015.*	No. SR-86/D.03/2015 tanggal 21 Mei 2015. *No. SR-86/D.03/2015 dated May 21, 2015.*	2023-2026
Anggar Budhi Nuraini	Komisaris Independen *Independent Commissioner*	2023-2026: Keputusan di Luar RUPS Luar Biasa tanggal 26 Mei 2023. *2023–2026: Circular Resolution of the Extraordinary General Meeting of Shareholders on 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:

1. Yang dapat diangkat menjadi anggota Dewan Komisaris adalah orang perseorangan yang memenuhi persyaratan pada saat diangkat dan selama menjabat, yaitu:
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.
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.

Criteria for Members of the Board of Commissioners

The Bank's Board of Commissioners must comply with the requirements and appointment procedures in accordance with the following criteria:

1. *Individuals eligible for appointment as members of the Board of Commissioners must meet the requirements at the time of appointment and throughout their term of office, namely:*
2. *The eligibility requirements referred to in point (1) above do not preclude other competent authorities from establishing additional requirements based on laws and regulations.*
3. *In addition to the above requirements, Independent Commissioners must also meet the following requirements:*
    a. *Not a person who works for 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 affiliated with the Bank, which could affect their ability to act independently within the last 1 (one) year, except for reappointment as an Independent Commissioner of the Bank for the subsequent term;*
    b. *The provision referred to in point (3.a) above does not apply to former members of the Board of Directors or Executive Officers who perform supervisory functions;*
    c. *Do not hold any shares, either directly or indirectly, in the bank;*
    d. *Have no affiliation with the Bank, members of the Board of Commissioners, members of the Board of Directors, or the Bank's Major Shareholders;*
    e. *Do not have any business relationships, either directly or indirectly, related to the Bank's business activities;*
    f. *An Independent Commissioner serving as Chairman of a Committee may concurrently serve as Chair of a maximum of 1 (one)other Committee;*
    g. *Candidates for Independent Commissioner must possess adequate knowledge of banking and relevant to the position of Independent Commissioner, as well as experience in banking and/or finance.*
4. *Individuals who meet these requirements are submitted to the Bank for a selection process (assessment) of the candidate's capabilities, background, suitability, education, character, ethics, and integrity, conducted by the Remuneration and Nomination Committee (KRN).*
5. *Candidates who meet the qualifications and are to be submitted to the Board of Commissioners for submission to the General Meeting of Shareholders (GMS) and the Financial Services Authority (OJK) must have received a recommendation from the RNC.*

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 sekurangnya 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 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

6. If a member of the KRN has a conflict of interest with a candidate for the Board of Commissioners, such conflict must be disclosed.
7. Members of the Board of Commissioners are appointed by the General Meeting of Shareholders (GMS) for a term of 3 (three) years, without prejudice to the GMS's right to remove them at any time.
8. The appointment of members of the Board of Commissioners must be approved by the GMS and they must have passed the Fit and Proper Test conducted by the OJK, and/or meet other requirements established by other relevant authorities before being declared effective as Commissioners.
9. A Commissioner-designate who has not yet been officially appointed may not perform the duties and responsibilities of a commissioner or make legally binding decisions, and therefore does not yet possess the rights and obligations of a commissioner.
10. A Commissioner-designate who has been officially appointed is required to prepare and submit a Personal Statement by the Commissioner regarding deposit insurance to the Deposit Insurance Corporation (LPS) in accordance with applicable regulations.
11. n the event of a vacancy on the Board of Commissioners, the Board of Commissioners shall consist of the remaining members until a new member is appointed to fill the vacancy. No later than 30 (thirty) calendar days after the vacancy arises, the Bank must hold a General Meeting of Shareholders to fill the vacancy.
12. A member of the Board of Commissioners has the right to resign from his or her position by giving written notice to the Bank at least 30 (thirty) days prior to the date of resignation.
13. The term of office of a member of the Board of Commissioners shall end if: i) the member resigns in accordance with paragraph 12 above; ii) the member no longer meets the applicable requirements; iii) the member dies; iv) the member is dismissed by the General Meeting of Shareholders.
14. Members of the Board of Commissioners must be willing to continuously improve their competencies through education and training.
15. Is not currently subject to the final consequences of a reassessment by a major party with a failing grade and/or is not included on the list of those who failed.
16. The replacement and/or appointment of members of the Board of Commissioners prioritizes professional composition, independence, suitability of competencies, and consideration of diversity, which are appropriately required in the performance of the duties and responsibilities of the Board of Commissioners.
17. The Bank shall stipulate in its articles of association the criteria, mechanisms, and procedures for the appointment, replacement, dismissal, and/or resignation of members of the Board of Commissioners, including

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:
    a. Anggota Dewan Komisaris merupakan orang perseorangan yang memenuhi persyaratan persetujuan Otoritas Jasa Keuangan;
    b. Komisaris Independen dapat merangkap jabatan sebagai Ketua Komite paling banyak pada 2 (dua) Komite pada Bank yang sama;
    c. Seluruh anggota Dewan Komisaris selama menjabat wajib memiliki integritas, kompetensi dan reputasi yang baik;
    d. 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.
    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.

the powers vested in the Board of Commissioners, in accordance with applicable laws and regulations.

18. *Committee members performing nomination functions who have a conflict of interest with a recommended proposal must disclose such conflict in the recommended proposal.*
19. *The Bank shall stipulate in its Articles of Association that the term of office for members of the Board of Commissioners shall be a maximum of 5 (five) years for 1 (one) term of office, commencing on the effective date of the appointment of the Board of Commissioners by the General Meeting of Shareholders, and shall also stipulate other conditions regarding the fulfillment of the duties of Board of Commissioners members.*
20. *Regarding the Implementation of Corporate Governance for Commercial Banks:*
    a. *Members of the Board of Commissioners are individuals who meet the requirements for approval by the Financial Services Authority;*
    b. *Independent Commissioners may concurrently serve as Chair of a Committee on no more than 2 (two) Committees at the same Bank;*
    c. *All members of the Board of Commissioners must possess integrity, competence, and a good reputation throughout their term of office;*
    d. *Possess competence, including:*
        - *possessing knowledge and/or competence (expertise) that can be utilized in the supervision of the Bank, including matters related to management policies and the conduct of management, as well as providing advice to the Board of Directors;*
        - *overseeing the Bank and direct, monitor, and evaluate the implementation of the Bank's strategic policies in accordance with regulations, with the aim of fostering the healthy development of Bank, implementing effective and efficient risk management and internal control systems, and complying with applicable laws, regulations, and standards;*
        - *overseeing the formulation of business strategies and the execution of business activities by the Board of Directors to ensure alignment with environmental, social, and governance aspects; and*
        - *Possessing knowledge of Indonesia, particularly regarding the economy, culture, and the Indonesian language, for members of the Board of Commissioners who are foreign workers, in accordance with the Financial Services Authority's regulations on the employment of foreign workers and knowledge transfer programs in the banking sector.*
    e. *The Board of Commissioners has fulfilled its duty to ensure the implementation of good governance principles in all of the Bank's business activities at every level of the organization.*

f. Dewan Komisaris telah melaksanakan tugas dan tanggung jawab secara independen.
g. Hasil rapat Dewan Komisaris merupakan rekomendasi dan/atau arahan yang dapat diimplementasikan oleh RUPS dan/atau Direksi.
h. 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

f. The Board of Commissioners has conducted its duties and responsibilities independently.
g. The results of the Board of Commissioners' meetings consist of recommendations and/or directives that may be implemented by the General Meeting of Shareholders and/or the Board of Directors.
h. Enhancement of the knowledge, expertise, and capabilities of the members of the Board of Commissioners in the supervision of the Bank, as evidenced by improved Bank performance, the resolution of issues faced by the Bank, and the achievement of results in line with stakeholder expectations. Fostering a culture of continuous learning to enhance knowledge of banking and the latest developments in the financial sector or other fields that support the performance of the duties and responsibilities of the members of the Board of Commissioners

Pedoman dan Tata Tertib Kerja Dewan Komisaris

Bank Sahabat Sampoerna telah memiliki Pedoman dan Tata Tertib Kerja Dewan Komisaris yang ditetapkan melalui Surat Keputusan No. BSS/KK-DEKOM/CSC/01/2024. Pedoman ini berfungsi sebagai acuan bagi Dewan Komisaris dalam menjalankan tugas, tanggung jawab, dan melaksanakan fungsi pengawasan perusahaan. Pedoman ini disusun dengan mengacu pada Anggaran Dasar dan peraturan perundang-undangan yang berlaku. Secara umum, Pedoman dan Tata Tertib Kerja Dewan Komisaris memuat 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.

Guidelines and Rules of Procedure for the Board of Commissioners

Bank Sahabat Sampoerna has established Guidelines and Rules of Procedure for the Board of Commissioners, which were enacted through Decree No. BSS/KK-DEKOM/CSC/01/2024. These guidelines serve as a reference for the Board of Commissioners in performing their duties, responsibilities, and supervisory functions within the company. These guidelines were drafted in accordance with the Articles of Association and applicable laws and regulations. In general, the Guidelines and Rules of Procedure for the Board of Commissioners cover the main functions of the Board of Commissioners, namely:

1. Structure and Membership;
2. Requirements and Appointment;
3. Duties and Responsibilities;
4. Conflicts of Interest;
5. Transparency;
6. Ethics and Working Hours;
7. Meetings;
8. Term of Office;
9. Resignation; and
10. Performance Evaluation and Accountability.

Aspek Independensi Dewan Komisaris

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

Aspects of the Independence of the Board of Commissioners

All members of the Board of Commissioners of Bank Sahabat Sampoerna are committed to performing their duties and responsibilities independently by carrying out their duties and responsibilities professionally, objectively, and with due diligence. The Bank also ensures that all members of the Board of Commissioners have no conflicts of interest and are free from interference by shareholders, so that the Board of Commissioners can perform its duties to the fullest and most effective extent.

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.
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

Duties, Responsibilities, and Authorities of the Board of Commissioners

In performing its supervisory function over the Bank's management, the Board of Commissioners has the following duties and responsibilities:

1. *No member of the Board of Commissioners may act individually, but must act based on the decisions of the Board of Commissioners.*
2. *The Board of Commissioners is responsible for supervising, in the Bank's best interests, the policies and management practices of the Board of Directors, providing advice to the Board of Directors, and assuming responsibility for such oversight, in accordance with the Bank's objectives and purposes as set forth in applicable laws and regulations, the Articles of Association, and resolutions of the General Meeting of Shareholders.*
3. *The Board of Commissioners is obligated to perform its duties and responsibilities in good faith, with full responsibility, due diligence, and independence.*
4. *The Board of Commissioners receives and exercises its authority in accordance with applicable laws and regulations, the Articles of Association, and the General Meeting of Shareholders.*
5. *The Board of Commissioners must ensure the implementation of good corporate governance in all of the Bank's business activities at all levels of the organization, at a minimum through:*
    a. *The performance of the duties and responsibilities of the Board of Commissioners and the Board of Directors;*
    b. *The composition and performance of the duties of the committees and units that execute the Bank's internal control functions;*
    c. *The implementation of compliance, internal audit, and external audit functions;*
    d. *Implementation of risk management, including internal control systems;*
    e. *Provision of funds to related parties and large-scale funding;*
    f. *The Bank's strategic plan;*
    g. *Transparency regarding the Bank's financial and non-financial conditions; and*
    h. *Approving and periodically reviewing the Bank's vision, mission, and core values.*
6. *The Board of Commissioners is responsible for overseeing management policies and the general conduct of management, is accountable for such oversight, and provides advice to the Board of Directors.*
7. *In performing its supervisory duties, 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 unable to attend, all duties and authorities granted*

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 APUPPT dan PPPSPM;
   e. Memastikan adanya pembahasan terkait penerapan program APU-PPT dan PPPSPM dalam rapat Direksi dan Dewan Komisaris; dan
   f. Dewan Komisaris dilarang memberitahukan kepada Pengguna Jasa atau pihak lain, baik secara langsung maupun tidak langsung, dengan cara apapun 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:
   a. Mengevaluasi, mengarahkan dan memantau rencana strategis teknologi informasi dan kebijakan Bank terkait penggunaan teknologi informasi;

to the President Commissioner or other members of the Board of Commissioners in the Bank's Articles of Association shall also apply to that member.

9. *The Board of Commissioners is prohibited from participating in decision-making regarding the Bank's operational activities, except:*
   a. *The provision of funds to related parties as regulated in the Financial Services Authority's provisions regarding 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's supervisory duties and therefore does not negate the Board of Directors' responsibility for the management of the Bank.*
11. *The Board of Commissioners approves and oversees the implementation of the Bank's Business Strategy and certain Bank policies in accordance with applicable regulations, including the establishment and implementation of Anti-Fraud strategies, Anti-Money Laundering and Counter-Terrorism Financing (AML-CFT) procedure, Legal Lending Limit (LLL), and other Bank strategies in accordance with applicable regulations.*
12. *The Board of Commissioners' active oversight of the implementation of AML, CFT, and CPF includes, at a minimum:*
   a. *Ensuring the Bank has policies and procedures for implementing the AML-CTF & CPWMD programs;*
   b. *Approving the policies and procedures for implementing the AML-CTF & CPWMD programs proposed by the Board of Directors;*
   c. *Conduct evaluations of policies and procedures for implementing the APU-PPT and PPPSPM programs;*
   d. *Monitoring the Board of Directors' fulfillment of its responsibilities regarding the implementation of the APU-PPT and PPPSPM programs;*
   e. *Ensuring that the implementation of the AML-CTF & CPWMD programs is discussed in meetings of the Board of Directors and the Board of Commissioners; and*
   f. *The Board of Commissioners is prohibited from disclosing to Service Users or other parties, either directly or indirectly, in any manner whatsoever, regarding Suspicious Financial Transaction reports that are being prepared or have been submitted to the PPATK; however, this prohibition does not apply to the provision of information to Supervisory and Regulatory Agencies.*
13. *The authority and responsibilities of the Board of Commissioners regarding the implementation of risk management in the use of information technology include, at a minimum:*
   a. *Evaluating, directing, and monitoring the Bank's strategic information technology plans and policies regarding the use of information technology;*

b. Mengevaluasi pertanggungjawaban Direksi atas penerapan manajemen risiko dalam penggunaan teknologi informasi;
c. Bank wajib menerapkan manajemen risiko secara efektif dalam penggunaan Teknologi Informasi, penerapan manajemen risiko sebagaimana dimaksud paling sedikit mencakup pengawasan aktif Dewan Komisaris;
d. 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; dan
e. 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:
    a. Pelanggaran peraturan perundang-undangan di bidang keuangan, perbankan, dan yang terkait dalam kegiatan usaha Bank;
    b. Keadaan atau perkiraan keadaan yang dapat membahayakan kelangsungan usaha Bank; serta
    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:
    a. Komite Audit;
    b. Komite Pemantau Risiko;
    c. Komite Remunerasi dan Nominasi;
    d. 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

b. Evaluating the Board of Directors' accountability for the implementation of risk management in the use of information technology;
c. The Bank is required to effectively implement risk management in the use of information technology; such implementation of risk management must, at a minimum, include active oversight by the Board of Commissioners;
d. The Bank must establish clear authorities and responsibilities for the Board of Commissioners and officials at every level of the organization with regard to the implementation of information technology governance; and
e. The authority and responsibilities of the Board of Commissioners referred to herein shall include, at a minimum:
    - *evaluating, directing, and monitoring the strategic plan for Information Technology; and*
    - *evaluating, directing, and monitoring the implementation of Information Technology governance.*

14. The Board of Commissioners, through the Remuneration and Nomination Committee, oversees the selection and assessment of candidates for the Board of Directors and the Board of Commissioners' Executive Committee 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 business days from the discovery of:
    a. Violations of laws and regulations in the fields of finance, banking, and those related to the Bank's business activities;
    b. Circumstances or anticipated circumstances that could jeopardize the Bank's business continuity; and
    c. Based on recommendations from committees that support the effectiveness of the Board of Commissioners' performance of its duties. The matters reported are findings that have not yet been or were not reported by the Bank and/or by the Director responsible for compliance functions to the Financial Services Authority.

17. To support the effective performance of its duties and responsibilities, the Board of Commissioners must establish at least:
    a. An Audit Committee;
    b. Risk Monitoring Committee;
    c. Remuneration and Nomination Committee;
    d. The Board of Commissioners may establish other committees tailored to the needs and/or complexity of the Bank and/or expand the scope of the committees' duties, responsibilities, and authorities in support of the Board of Commissioners' oversight

tanggung jawab pengawasan Dewan Komisaris; dan

e. 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:
    a. Mengevaluasi pelaksanaan Fungsi Kepatuhan Bank paling kurang 2 kali dalam satu tahun; dan
    b. 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:
    a. 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;
    b. Mengevaluasi kebijakan manajemen risiko dan strategi 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); dan
    d. Wewenang dan tanggung jawab Dewan Komisaris paling sedikit:
        - Mengevaluasi pertanggungjawaban Direksi atas pelaksanaan kebijakan manajemen risiko; serta

duties and responsibilities; and

e. In the event that the Board of Commissioners establishes another committee, the membership of such committee shall consist of at least one Independent Commissioner and/or one Non-Independent Commissioner, and may include other parties in accordance with the purpose of the committee's establishment.

18. The appointment of committee members is made by the Board of Directors based on a resolution of the Board of Commissioners.

19. The duties and responsibilities of each committee are set forth in the respective Committee Guidelines and Rules of Procedure.

20. The Board of Commissioners is required to supervise the established committees, ensure they perform their duties effectively, and conduct evaluations and/or assessments of the performance of such committees at least at the end of each fiscal year.

21. The Board of Commissioners is required to actively oversee the compliance function by:
a. Evaluating the implementation of the Bank's Compliance Function at least twice a year; and
b. Providing recommendations to improve the quality of the Bank's Compliance Function.

22. The Board of Commissioners shall submit recommendations aimed at improving the quality of the implementation of the Compliance Function to the President Director, with a copy to the Director overseeing the Compliance Function.

23. The Board of Commissioners is responsible for ensuring the implementation of risk management in accordance with the Bank's characteristics, complexity, and risk profile by:
a. Approve risk management policies, including risk management strategies and frameworks established in accordance with the Bank's risk appetite and risk tolerance;
b. Evaluate risk management policies and risk management strategies at least once a year or more frequently in the event of significant changes in factors affecting the Bank's business activities;
c. Approve policies, oversight, and procedures for the management and mitigation of money laundering, terrorist financing, and/or the financing of the proliferation of weapons of mass destruction, as well as individual risk assessment documents (internal risk assessment, money laundering, terrorist financing, and/or the financing of the proliferation of weapons of mass destruction at the Bank); and
d. The authority and responsibilities of the Board of Commissioners shall include, at a minimum:
- *Evaluate the Board of Directors' accountability for the implementation of risk management policies; and*

- 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;
    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

- *Evaluating and deciding on requests from the Board of Directors regarding transactions requiring the approval of the Board of Commissioners.*

24. *The sustainable finance 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 the errors or negligence of a member of the Board of Commissioners in the performance of their duties.*
26. *Members of the Board of Commissioners shall not be held liable for the Bank's losses as referred to in paragraph (25) if they can prove that:*
    a. *The loss was not due to their error or negligence;*
    b. *Has done oversight in good faith, with a sense of responsibility, and with due care in the best interests of and in accordance with the Bank's objectives;*
    c. *Has no direct or indirect conflict of interest regarding management actions that result in losses; and*
    d. *Has taken measures to prevent the occurrence or continuation of such losses.*
27. *At a General Meeting of Shareholders, if all members of the Board of Directors are absent or unable to attend for any reason—which need not be proven to third parties—the meeting shall be chaired by the Lead Commissioner. If the Lead Commissioner is absent or unable to attend for any reason—which need not be proven to third parties—the meeting shall be chaired by a member of the Board of Commissioners.*
28. *The Board of Commissioners, based on a resolution of the Board of Commissioners' meeting, has the authority to temporarily dismiss a member of the Board of Directors, stating the reasons therefor. Specifically, regarding the President Director and/or the Director in charge of compliance functions, it is stipulated that:*
    a. *The dismissal or replacement of the President Director and/or the director responsible for compliance functions prior to the end of their term of office must first be approved by the Financial Services Authority before being decided upon at the General Meeting of Shareholders;*
    b. *In granting approval, the Financial Services Authority assesses the appropriateness of the plan to dismiss or replace the President Director and/or the director responsible for compliance functions;*
    c. *As material for the Financial Services Authority's assessment, the Bank submits a request for prior approval to the Financial Services Authority containing information regarding:*
        - *The reasons or considerations for the dismissal or replacement of the President Director and/or the director responsible for compliance*

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; dan
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.
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.

functions; and
- *The Bank may include the profile of a prospective replacement deemed to meet the requirements for a Fit and Proper Test.*

d. The Bank shall submit the request to the Financial Services Authority no later than 1 (one) month prior to the scheduled General Meeting of Shareholders that includes the agenda item regarding the dismissal or replacement of the President Director and/or the director in charge of compliance; and
e. If the Financial Services Authority deems the plan to dismiss or replace the President Director and/or the director responsible for compliance functions to be inappropriate, then:
- *the plan to dismiss or replace the President Director and/or the director in charge of compliance functions shall not be approved by the Financial Services Authority; and*
- *the Bank is prohibited from including the agenda item regarding the dismissal or replacement of the President Director and/or the director responsible for compliance functions in the General Meeting of Shareholders.*

29. In the event that a member of the Board of Directors is temporarily suspended, the Board of Commissioners must convene a General Meeting of Shareholders no later than 30 days after the date of such temporary suspension, to revoke or uphold the decision regarding the temporary suspension.
30. Accountability for the performance of duties conducted by the temporarily suspended member of the Board of Directors from the last accountability report until the temporary suspension takes effect must still be sought at the next Annual General Meeting of Shareholders.
31. The Board of Commissioners may manage the Bank under certain circumstances and for a specific period of time. In such cases, all provisions regarding the rights, powers, and obligations of the Board of Directors toward the Bank and third parties shall apply.
32. The Board of Commissioners shall at all times during office hours have the right to enter any building, premises, or other location used or controlled by the Bank, and shall have the right to inspect all books, documents, and other evidence, to examine and verify the status of cash and other assets, and to be informed of all actions taken by the Board of Directors.
33. The Board of Commissioners has the right to receive explanations regarding all matters related to the operations of the Bank and its subsidiaries, as well as matters related to the Bank's ethics.
34. The Board of Commissioners must ensure that the Board of Directors has and implements a plan for financial literacy and financial inclusion.

Tugas-Tugas Pokok Komisaris Utama

Selain melaksanakan tugas dan tanggung jawab secara kolegial, Komisari Utama memiliki sejumlah tugas pokok, antara lain:

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.

Key Duties of the President Commissioner

In addition to performing duties and responsibilities collectively, the President Commissioner has a number of key duties, including:

1. *Coordinating the implementation of the duties and responsibilities of the Board of Commissioners;*
2. *Proposing the convening of Board of Commissioners meetings, including the meeting agenda;*
3. *Convening and chairing Board of Commissioners meetings;*
4. *Submiting a Supervisory Report to obtain approval from the Annual General Meeting of Shareholders regarding the performance of duties and supervision by the Board of Commissioners; the report shall, at a minimum, include the Board of Commissioners' assessment of:*
    a. *The 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 Board of Commissioners has fulfilled its responsibilities in accordance with procedures;*
6. *Ensuring that the Board of Commissioners' meetings make decisions effectively based on accurate and complete information, including ensuring that:*
    a. *All strategic and important issues are considered by the Board of Commissioners;*
    b. *Existing issues are discussed thoroughly and carefully;*
    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 a brief explanation of the issues to be discussed at the Board of Commissioners meeting; and*
    e. *Board of Commissioners meetings result in clear decision which are recorded in the Meeting Minutes;*
7. *Ensuring that the Board of Commissioners acts in accordance with the Board of Commissioners' Guidelines and Rules of Procedure;*
8. *Leading efforts to meet the development needs of the Board of Commissioners;*
9. *Performing other responsibilities assigned by the Board of Commissioners from time to time; and*
10. *Conducting a final evaluation, taking into account the recommendations of the Remuneration and Nomination Committee regarding the results of the collective evaluation of the Board of Commissioners and its committees, as well as the individual evaluations of the members of the Board of Commissioners and the committee members.*

Benturan Kepentingan

Pedoman dan Tata Tertib Dewan Komisaris telah mengatur kebijakan terkait benturan kepentingan Dewan Komisaris Bank. Adapun kebijakan terkait benturan kepentingan tersebut, meliputi:

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.

Conflicts of Interest

The Board of Commissioners' Guidelines and Rules of Procedure have established policies regarding conflicts of interest involving the Bank's Board of Commissioners. These policies regarding conflicts of interest include:

1. *Members of the Board of Commissioners must avoid potential conflicts of interest or ensure that they do not place themselves in a position where a potential conflict of interest could arise under any circumstances. In the event of a conflict of interest, members of the Board of Commissioners are prohibited from taking any action that could harm or diminish the Bank's interests and are required to disclose such potential conflicts of interest in every decision.*
2. *The procedures that members of the Board of Commissioners must follow in the event of a conflict of interest are as follows:*
    a. *It is mandatory to immediately report in writing to the Board of Commissioners regarding all matters that have the potential to create and/or involve a conflict of interest that could have a significant financial or reputational impact on the Bank, the Board of Commissioners, and the Board of Directors.*
    b. *It is not permitted to participate in the evaluation process of any activities involving such conflicts of interest.*
    c. *May participate in meetings, but is not permitted to participate in decision-making.*
3. *If a member of the Board of Commissioners appointed by the Board of Commissioners to chair the General Meeting of Shareholders has a conflict of interest regarding a matter to be resolved at the General Meeting of Shareholders, the General Meeting of Shareholders shall be chaired 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 regarding matters to be decided at the GMS, the GMS shall be chaired by the President Director.*
5. *If all members of the Board of Commissioners and the Board of Directors have a conflict of interest, the GMS shall be chaired by one of the Independent Shareholders, namely a Shareholder who has no conflict of interest, 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 accept compensation, commissions, additional payments, services, money, valuables, and/or any other items of economic value or benefit, for the personal gain of themselves, their families, or other parties, in the course of the Bank's business activities and other activities related to the 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;
   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. 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.

7. Members of the Board of Commissioners are required to refuse and/or are prohibited from accepting any 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 inconsistent with the application of good corporate governance (GCG) at the Bank;
   b. Commit a criminal offense and/or acts that appear to constitute a criminal offense; and/or
   c. Engage in acts and matters that may harm, potentially harm, and/or reduce the Bank's profits.
8. In the event of a conflict of interest or a potential conflict of interest involving a candidate for the Board of Commissioners in connection with their nomination at the Bank, the candidate in question must disclose the conflict of interest during Fit and Proper Test.
9. A member of the Board of Commissioners who intentionally:
   a. making or causing false entries in the books of account or in the reporting process, as well as in business activity documents or reports, transaction reports, or bank accounts;
   b. omitting or failing to include, or causing the failure to record, entries in the books of account or in reports, as well as in business activity documents or reports, transaction reports, or a bank account;
   c. altering, obscuring, concealing, deleting, or eliminating the existence of an entry in the books of account or in a report, as well as in business activity documents or reports, transaction reports or bank accounts, or intentionally altering, obscuring, eliminating, concealing, or damaging such accounting records, shall be punishable by imprisonment for a minimum of 5 (five) years and a maximum of 15 (fifteen) years, as well as a fine of at least.

Etika dan Waktu Kerja

Dewan komisaris telah mematuhi etika dan waktu kerja berdasarkan Pedoman dan Tata Tertib Dewan Komisaris yang ditetapkan 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

Ethics and Working Hours

The Board of Commissioners has complied with ethics and working hours in accordance with the Guidelines and Rules of Procedure of the Board of Commissioners, which are stipulated as follows:
1. The Board of Commissioners must allocate sufficient time to optimally execute its duties and responsibilities. The allocation of sufficient time is reflected, among other things, by the relevant members' attendance at Board of Commissioners meetings, the performance of the Board of Commissioners' duties, and other related matters.
2. If a member of the Board of Commissioners plans to be unable to perform their duties for a period exceeding 3 consecutive months, such a plan must be submitted

diajukan dengan surat resmi terhadap Komisaris Utama 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 ketentuan yang berlaku di internal Bank.

in a formal letter to the President Commissioner, accompanied by the reasons, and subsequently, the plan must be approved in advance by the Board of Commissioners.

3. *If, for any reason, a member of the Board of Commissioners is legally classified as a suspect or defendant and is therefore unable to perform their duties, this must be reported to the Board of Commissioners, with a copy to the Board of Directors, so that the Board of Commissioners may subsequently decide on the member's status at a Board of Commissioners meeting.*
4. *The Board of Commissioners must be committed to upholding the principle of compliance with applicable laws and regulations.*
5. *The Board of Commissioners must not use information obtained from the Bank to make decisions for the personal benefit or interest of themselves, their families, or affiliated parties.*
6. *The Board of Commissioners may not receive any income or personal benefits from the Bank other than the remuneration and other benefits established in the Bank's policies and approved by the General Meeting of Shareholders.*
7. *The Board of Commissioners must prioritize the Bank's interests by applying the principles of professionalism and integrity, and must work and conduct themselves to the highest standards.*
8. *The Board of Commissioners shall not retain or duplicate documents or control the Bank's assets for personal gain.*
9. *Unless otherwise provided for in applicable laws and regulations and the Articles of Association, the Board of Commissioners is not authorized to represent the Bank even if granted authority by the Board of Directors, except in cases where the Board of Directors is unable to function, in which case the Board of Commissioners assumes the role of the Board of Directors.*
10. *No member of the Board of Commissioners may accept, give, or offer anything from or to government officials or business partners.*
11. *A majority of the 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 obligated to safeguard confidential information regarding the Bank, or information regarding customers and business partners, from anyone who is not authorized to know such information, or parties with no legitimate interest in such information, unless requested by an authorized party in accordance with applicable laws.*
13. *Members of the Board of Commissioners and their family members who intend to invest in or hold shares in the Bank or its subsidiaries must obtain the approval of at least two-thirds of the other members of the Board of Commissioners or in accordance with applicable regulations.*
14. *The Board of Commissioners' code of conduct is also guided by the Bank's internal regulations.*

Jenis-Jenis Keputusan yang Perlu Mendapatkan Persetujuan Dewan Komisaris

Anggaran Dasar Bank mengatur tentang pembatasan wewenang Direksi, dimana Direksi harus terlebih dahulu memperoleh persetujuan Dewan Komisaris untuk sejumlah tindakan, meliputi:

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.

Types of Decisions Requiring Approval by the Board of Commissioners

The Bank's Articles of Association stipulate limitations on the Board of Directors' authority, requiring the Board of Directors to first obtain the Board of Commissioners' approval for certain actions, including:

1. *Policies, establishment, and implementation of anti-fraud, anti-money laundering, counter-terrorist financing, and counter-proliferation of weapons of mass destruction (AML-CTF & CPWMD) strategies, Legal Lending Limit (LLL), and other Bank strategies in accordance with applicable regulations;*
2. *The Sustainable Finance 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.*

Pelaksanaan Rapat Internal Dewan Komisaris

Pedoman dan Tata Tertib Dewan Komisaris mengatur mengenai pelaksanaan rapat bagi Dewan Komisaris yang wajib diselenggarakan sekurang-kurangnya sebanyak 1 (satu) kali dalam 2 (dua) bulan. Pada pelaksanaannya, Dewan Komisaris telah melaksanakan rapat internal sebanyak 10 (sepuluh) kali sepanjang tahun 2025 yang dilakukan secara daring maupun tatap muka. Adapun frekuensi kehadiran beserta agenda rapat internal Dewan Komisaris di tahun 2025 adalah sebagai berikut:

Conduct of Internal Meetings of the Board of Commissioners

The Board of Commissioners' Guidelines and Rules of Procedure stipulate that the Board of Commissioners must hold meetings at least once every two months. In practice, the Board of Commissioners held 10 internal meetings throughout 2025, conducted both online and in person. The attendance frequency and agenda for the Board of Commissioners' internal meetings in 2025 are as follows:

Nama *Name*	**Jabatan** *Position*	**Total Rapat** *Total Meetings*	**Kehadiran** *Attendance*	**Persentase (%)** *Percentage (%)*
Budi Setiawan Halim	Komisaris Utama *President Commissioner*	10	10	100%
Harry Mulyadi Santoso	Komisaris *Commissioner*	10	5	50%
Khoe Minhari Handikusuma	Komisaris Independen *Independent Commissioner*	10	10	100%
Anggar Budhi Nuraini	Komisaris Independen *Independent Commissioner*	10	10	100%
Rata-rata *Average*				88%

Tanggal *Date*	Agenda	Kehadiran *Attendance*			
		BSH	HMS	KMH	ABN
23 Januari 2025 *January 23, 2025*	• Summary Portfolio Desember 2024 • Laporan Komite Audit • Laporan Komite pemantau Risiko • *December 2024 Portfolio Summary* • *Audit Committee Report* • *Risk Monitoring Committee Report*	v	x	v	v
27 Februari 2025 *February 27, 2025*	• Summary Portfolio Januari 2025 • Laporan Komite Audit • Laporan Komite pemantau Risiko • *January 2025 Portfolio Summary* • *Audit Committee Report* • *Risk Monitoring Committee Report*	v	x	v	v
25 Maret 2025 *March 25, 2025*	• Summary Portfolio Februari 2025 • Laporan Komite Audit • Laporan Komite pemantau Risiko • *February 2025 Portfolio Summary* • *Audit Committee Report* • *Risk Monitoring Committee Report*	v	x	v	v
27 Mei 2025 *May 27, 2025*	• Summary Portfolio April 2025 • Laporan Komite Audit • Laporan Komite pemantau Risiko • *April 2025 Portfolio Summary* • *Audit Committee Report* • *Risk Monitoring Committee Report*	v	v	v	v
19 Juni 2025 *June 19, 2025*	• Summary Portfolio Mei 2025 • Laporan Komite Audit Laporan Komite pemantau Risiko • *May 2025 Portfolio Summary* • *Audit Committee Report Risk Monitoring Committee Report*	v	v	v	v
24 Juli 2025 *July 24, 2025*	• Summary Portfolio Juni 2025 • Laporan Komite Audit • Laporan Komite pemantau Risiko • *June 2025 Portfolio Summary* • *Audit Committee Report* • *Risk Monitoring Committee Report*	v	v	v	v
21 Agustus 2025 *August 21, 2025*	• Summary Portfolio Juli 2025 • Laporan Komite Audit • Laporan Komite pemantau Risiko • *July 2025 Portfolio Summary* • *Audit Committee Report* • *Risk Monitoring Committee Report*	v	v	v	v
25 September 2025 *September 25, 2025*	• Summary Portfolio Agustus 2025 • Laporan Komite Audit • Laporan Komite pemantau Risiko • *August 2025 Portfolio Summary* • *Audit Committee Report* • *Risk Monitoring Committee Report*	v	x	v	v
23 Oktober 2025 *October 23, 2025*	• Summary Portfolio September 2025 • Laporan Komite Audit • Laporan Komite pemantau Risiko • *September 2025 Portfolio Summary* • *Audit Committee Report* • *Risk Monitoring Committee Report*	v	v	v	v
20 November 2025 *November 20, 2025*	• Summary Portfolio Oktober 2025 • Recovery Plan & RAKB 2025 • Laporan Komite Audit • Laporan Komite pemantau Risiko • *October 2025 Portfolio Summary* • *Recovery Plan & RAKB 2025* • *Audit Committee Report* • *Risk Monitoring Committee Report*	v	x	v	v

Keterangan | *Remarks*:
BSH: Budi Setiawan Halim
HMS: Harry Mulyadi Santoso
KMH: Khoe Minhari Handikusuma
ABN: Anggar Budhi Nuraini

Rapat Gabungan Dewan Komisaris bersama Direksi

Joint Meeting of the Board of Commissioners and the Board of Directors

Selain mengadakan rapat internal, Dewan Komisaris juga dapat menyelenggarakan rapat gabungan bersama Direksi secara berkala minimal 1 (satu) kali dalam 4 (empat) bulan atau paling kurang 3 (tiga) kali dalam setahun. Di tahun 2025, Dewan Komisaris telah menyelenggarakan rapat gabungan sebanyak 10 (sepuluh) kali. Frekuensi kehadiran dan agenda rapat gabungan Dewan Komisaris bersama Direksi sepanjang tahun 2025 dapat dilihat sebagai berikut:

In addition to holding internal meetings, the Board of Commissioners may also hold joint meetings with the Board of Directors on a regular basis, at least once every four months or at least three times a year. In 2025, the Board of Commissioners held 10 (ten) joint meetings. The attendance frequency and agenda of the joint meetings between the Board of Commissioners and the Board of Directors' Executive Committee throughout 2025 are as follows:

Nama *Name*	**Jabatan** *Position*	**Total Rapat** *Total Meetings*	**Kehadiran** *Attendance*	**Persentase (%)** *Percentage (%)*
Dewan Komisaris ***Board of Commissioners***				
Budi Setiawan Halim	Komisaris Utama *President Commissioner*	10	9	90%
Harry Mulyadi Santoso	Komisaris *Commissioner*	10	10	100%
Khoe Minhari Handikusuma	Komisaris Independen *Independent Commissioner*	10	10	100%
Anggar Budhi Nuraini	Komisaris Independen *Independent Commissioner*	10	10	100%
Rata-rata *Average*				98%
Direksi ***Board of Directors***				
Ali Rukmijah	Direktur Utama *President Director*	10	10	100%
A. Dendi Hardiansyah	Direktur Kepatuhan & Manajemen Risiko *Compliance & Risk Director*	10	10	100%
Henky Suryaputra	Direktur Keuangan & Perencanaan Bisnis *Finance & Business Planning Director*	10	10	100%
Patrick Wong*	Direktur Bisnis *Business Director*	10	10	100%
Rudy Mahasin**	Direktur Bisnis UMKM *MSME Business Director*	10	10	100%
Hendra Rahardja	Direktur Teknologi Informasi *Information Technology Director*	10	10	100%
Rata-rata *Average*				100%

* Resmi menjabat per 25 November 2025 | *Officially serving as of November 25, 2025*
** Perubahan Nomenklatur Jabatan Menjadi Chief ESME per 25 November 2025 | *Job title changed to Chief ESME effective November 25, 2025*

Tanggal *Date*	**Agenda**	**Kehadiran** *Attendance*									
		BSH	**HMS**	**KMH**	**ABN**	**AR**	**ADH**	**HS**	**PW**	**RM**	**HR**
23 Januari 2025 *January 23, 2025*	• Paparan Kinerja Keuangan per posisi Desember 2024 • Presentasi Perlindungan Konsumen • *Financial Performance Overview as of December 2024* • *Consumer Protection Presentation*	v	v	v	v	v	v	v	v	v	v
27 Februari 2025 *February 27, 2025*	Paparan Kinerja Keuangan per posisi Januari 2025 *Financial Performance Report as of January 2025*	v	v	v	v	v	v	v	v	v	v

Tanggal *Date*	Agenda	Kehadiran *Attendance*									
		BSH	HMS	KMH	ABN	AR	ADH	HS	PW	RM	HR
25 Maret 2025 *March 25, 2025*	• Presentasi APU – PPT • Paparan Kinerja Keuangan per posisi Februari 2025 • *Funding Business Activities & Initiatives Update* • *Presentation of AML-CTF* • *Financial Performance Overview as of February 2025* • *Update on Funding Business Activities & Initiatives*	v	v	v	v	v	v	v	v	v	v
27 Mei 2025 *May 27, 2025*	• Tindak lanjut Rekomendasi BoC ke Management • Paparan Kinerja Keuangan per posisi April 2025 • Tindak lanjut Penyertaan Modal EDV • *Follow-up on Board of Commissioners Recommendations to Management* • *Financial Performance Presentation as of April 2025* • *Follow-up on EDV Capital Contribution*	v	v	v	v	v	v	v	v	v	v
19 Juni 2025 *June 19, 2025*	Paparan Kinerja Keuangan per posisi Mei 2025 *Financial Performance Report as of May 2025*	v	v	v	v	v	v	v	v	v	v
24 Juli 2025 *July 24, 2025*	Paparan Kinerja Keuangan per posisi Juni 2025 *Financial Performance Report as of June 2025*	v	v	v	v	v	v	v	v	v	v
21 Agustus 2025 *August 21, 2025*	Paparan Kinerja Keuangan per posisi Juli 2025 *Financial Performance Report as of July 2025*	v	v	v	v	v	v	v	v	v	v
25 September 2025 *September 25, 2025*	Paparan Kinerja Keuangan per posisi Agustus 2025 *Financial Performance Report as of August 2025*	v	v	v	v	v	v	v	v	v	v
23 Oktober 2025 *October 23, 2025*	Paparan Kinerja Keuangan per posisi September 2025 *Financial Performance Report as of September 2025*	v	v	v	v	v	v	v	v	v	v
20 November 2025 *November 20, 2025*	• Tindaklanjut Rekomendasi BoC ke Management • Paparan Kinerja Keuangan per posisi Oktober 2025 • *Follow-up on Board of Commissioners Recommendations to Management* • *Financial Performance Presentation as of October 2025*	x	v	v	v	v	v	v	v	v	v

Keterangan | *Remarks*
BSH: Budi Setiawan Halim
HMS: Harry Mulyadi Santoso
KMH: Khoe Minhari Handikusuma
ABN: Anggar Budhi Nuraini
AR: Ali Rukmijah
ADH: A. Dendi Hardiansyah
HS: Henky Suryaputra
PW: Patrick Wong*
RM: Rudy Mahasin**
HR: Hendra Rahardja
* Resmi menjabat per 25 November 2025 | *Officially serving as of November 25, 2025*
** Perubahan Nomenklatur Jabatan Menjadi Chief ESME per 25 November 2025 | *Job title changed to Chief ESME effective November 25, 20*

Kepemilikan Saham

Per 31 Desember 2025, seluruh Anggota Dewan Komisaris tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic. Informasi tentang Kepemilikan Saham Dewan Komisaris telah diungkapkan pada Bab Profil Perusahaan dalam Laporan Tahunan ini.

Share Ownership

As of December 31, 2025, none of the members of the Board of Commissioners held shares in either Bank Sahabat Sampoerna or any other company affiliated with the Sampoerna Strategic Group. Information regarding the Board of Commissioners' shareholdings is disclosed in the Company Profile section of this Annual Report.

Hubungan Afiliasi

Informasi terkait hubungan afiliasi antara Dewan Komisaris dengan Dewan Komisaris lainnya, Direksi, dan Pemegang Saham Pengendali dapat dilihat sebagai berikut:

Affiliated Relationships

Information regarding affiliate relationships between members of the Board of Commissioners and other members of the Board of Commissioners, the Board of Directors, and Controlling Shareholders is as follows:

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

Keterangan | *Remarks*:
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:

1. Anggota Dewan Komisaris hanya dapat merangkap jabatan sebagai:
   a. Anggota Dewan Komisaris, Direksi, atau Pejabat Eksekutif pada 1 lembaga/perusahaan bukan lembaga keuangan; atau
   b. Anggota Dewan Komisaris, Direksi, atau Pejabat Eksekutif yang melaksanakan fungsi pengawasan pada 1 perusahaan anak bukan bank yang dikendalikan oleh Bank.
2. Tidak termasuk rangkap jabatan, apabila:
   a. Anggota Dewan Komisaris non-Independen menjalankan tugas fungsional dari Pemegang Saham Bank yang berbentuk badan hukum pada kelompok usahanya;
   b. 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
   c. 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.

Concurrent Positions

The Board of Commissioners' Guidelines and Rules of Procedure have established policies regarding the holding of concurrent positions by members of the Board of Commissioners, including:

1. *Members of the Board of Commissioners may only hold concurrent positions as:*
   a. *A member of the Board of Commissioners, the Board of Directors, or an Executive Officer at one non-financial institution or company; or*
   b. *A member of the Board of Commissioners, the Board of Directors, or an Executive Officer performing supervisory functions at one non-bank subsidiary controlled by the Bank.*
2. *This does not constitute a conflict of interest if:*
   a. *A non-independent member of the Board of Commissioners performs functional duties for a shareholder of the Bank that is a legal entity within its business group;*
   b. *A member of the Board of Commissioners holds a position in a non-profit organization or institution, provided that such person does not neglect the performance of duties and responsibilities as a member of the Bank's Board of Commissioners; and/or*
   c. *A member of the Board of Commissioners serves as a member of the Board of Directors, a member of the Board of Commissioners, or an Executive Officer performing supervisory functions at one non-bank subsidiary controlled by the Bank.*

Rangkap jabatan masing-masing anggota Dewan Komisaris Bank Sahabat Sampoerna di tahun 2025 dapat dilihat sebagai berikut:

The concurrent positions held by each member of the Board of Commissioners of Bank Sahabat Sampoerna in 2025 are as follows:

Nama *Name*	**Jabatan di Bank Sahabat Sampoerna** *Position at Bank Sahabat Sampoerna*	**Perusahaan/Instansi Lain** *Other Companies/Institutions*	
		Nama Perusahaan *Company Name*	**Jabatan** *Position*
Budi Setiawan Halim	• Komisaris Utama • Anggota Komite Remunerasi dan Nominasi • *President Commissioner* • *Member of the Remuneration and Nomination Committee*	PT Sampoerna Agro Tbk*)	Direktur Utama *President Director*
Harry Mulyadi Santoso	• Komisaris • Anggota Komite Pemantau Risiko • *Commissioner* • *Member of the Risk Monitoring Committee*	-	-
Khoe Minhari Handikusuma	• Komisaris Independen • Ketua Komite Remunerasi dan Nominasi • Ketua Komite Pemantau Risiko • *Independent Commissioner* • *Chair of the Remuneration and Nomination Committee* • *Chairman of the Risk Monitoring Committee*	PT Pandawa Gagas Raharja*)	Komisaris *Commissioner*
Anggar Budhi Nuraini	• Komisaris Independen • Ketua Komite Audit • *Independent Commissioner* • *Chair of the Audit Committee*	-	-

*) Bukan lembaga/perusahaan keuangan | *Not a financial institution/company*

Kebijakan Keberagaman Komposisi Dewan Komisaris

Diversity Policy for the Composition of the Board of Commissioners

Di tahun 2025, Bank belum menyusun dan menetapkan kebijakan yang mengatur keberagaman komposisi Dewan Komisaris. Meski demikian, komposisi Dewan Komisaris telah disusun sedemikian rupa dengan memperhatikan kombinasi karakteristik dan kemampuan sesuai dengan kebutuhan Bank serta memastikan kesesuaiannya dengan peraturan perundang-undangan yang berlaku.

As of 2025, the Bank has not yet formulated or established a policy governing the diversity of the Board of Commissioners' composition. Nevertheless, the composition of the Board of Commissioners has been structured in such a way as to take into account a combination of characteristics and capabilities aligned with the Bank's needs, while ensuring compliance with applicable laws and regulations.

Aspek Keberagaman *Diversity Aspects*	**Penjelasan** *Explanation*	
Pendidikan *Education*	Latar belakang pendidikan Dewan Komisaris beragam, mulai dari sarjana sampai master, dengan kompetensi di bidang Ekonomi, Sains, Keuangan, dan Administrasi Bisnis. *The educational backgrounds of the Board of Commissioners are diverse, ranging from bachelor's to master's degrees, with expertise in the fields of Economics, Science, Finance, and Business Administration.*	Komposisi Dewan Komisaris telah memenuhi unsur keberagaman, yaitu perpaduan dari sisi pendidikan, pengalaman kerja, dan usia. *The composition of the Board of Commissioners reflects diversity, encompassing a mix of educational backgrounds, work experience, and age.*
Pengalaman Kerja *Work Experience*	Keberagaman pengalaman kerja anggota Dewan Komisaris berasal dari profesional pada perbankan, perusahaan non keuangan, dan konsultan. *The members of the Board of Commissioners bring a diverse range of professional experience from the banking sector, non-financial companies, and consulting firms.*	
Usia *Age*	Usia Dewan Komisaris Bank antara 52-62 tahun. *The ages of the Bank's Board of Commissioners range from 52 to 62 years.*	
Jenis Kelamin *Gender*	Bank Sahabat Sampoerna mempunyai anggota Dewan Komisaris yang berjenis kelamin laki-laki dan wanita. *Bank Sahabat Sampoerna has both male and female members on its Board of Commissioners.*	

Program Pengenalan bagi Dewan Komisaris Baru

Bank Sahabat Sampoerna memliki program pengenalan perusahaan bagi anggota Dewan Komisaris yang baru diangkat. Program ini bertujuan untuk memberikan pemahaman yang memadai mengenai tugas dan tanggung jawabnya sebagai anggota Dewan Komisaris agar dapat dijalankan secara optimal. Selain itu, program pengenalan ini juga bertujuan untuk memberikan pemahaman mengenai latar belakang serta kegiatan usaha Bank, sehingga mendukung kelancaran dan efektivitas pelaksanaan tugas dan fungsi Dewan Komisaris.

Di tahun 2025, Bank Sahabat Sampoerna tidak mengalami perubahan komposisi Dewan Komisaris. Dengan demikian, Bank tidak melaksanakan program pengenalan perusahaan bagi anggota Dewan Komisaris yang baru menjabat.

Orientation Program for New Board of Commissioners Members

Bank Sahabat Sampoerna has a company orientation program for newly appointed members of the Board of Commissioners. This program aims to provide a thorough understanding of their duties and responsibilities as members of the Board of Commissioners so that can be managed optimally. In addition, this orientation program also aims to provide an understanding of the Bank's background and business activities, thereby supporting the smooth and effective performance of the Board of Commissioners' duties and functions.

In 2025, Bank Sahabat Sampoerna did not have any changes in the composition of its Board of Commissioners. Consequently, the Bank did not conduct an orientation program for newly appointed members of the Board of Commissioners.

Pengembangan Kompetensi Dewan Komisaris Tahun 2025

Untuk menunjang Dewan Komisaris dalam melaksanakan tugas dan tanggung jawabnya, Bank memberikan kesempatan kepada anggota Dewan Komisaris untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh pihak internal maupun eksternal. Sepanjang tahun 2025, anggota Dewan Komisaris Bank telah mengikuti program pelatihan dan pengembangan kompetensi sebagai berikut:

Development of the Board of Commissioners' Competencies in 2025

To support the Board of Commissioners in performing its duties and responsibilities, the Bank provides members of the Board of Commissioners with opportunities to participate in training and competency development programs, whether organized internally or externally. Throughout 2025, members of the Bank's Board of Commissioners have participated in the following training and competency development programs:

Nama *Name*	**Jabatan** *Position*	**Topik Pelatihan** *Training Topic*	**Penyelenggara** *Organizer*	**Tanggal Pelatihan** *Training Date*
Budi Setiawan Halim	Komisaris Utama *President Commissioner*	Sertifikasi Manajemen Risiko *Risk Management Certification*	Garda	Juli 2025 *July 2025*
Harry Mulyadi Santoso	Komisaris *Commissioner*	Sertifikasi Manajemen Risiko *Risk Management Certification*	Garda	Juli 2025 *July 2025*
Khoe Minhari Handikusuma	Komisaris Independen *Independent Commissioner*	Sertifikasi Manajemen Risiko *Risk Management Certification*	Garda	Juli 2025 *July 2025*
Anggar Budhi Nuraini	Komisaris Independen *Independent Commissioner*	Sertifikasi Manajemen Risiko *Risk Management Certification*	Garda	Juli 2025 *July 2025*

Pelaksanaan Tugas Dewan Komisaris Tahun 2025

Sepanjang tahun 2025, seluruh anggota Dewan Komisaris telah melaksanakan tugas dan tanggung jawabnya dengan baik serta sesuai dengan pedoman kerja yang berlaku, antara lain:

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

Performance of the Board of Commissioners in 2025

Throughout 2025, all members of the Board of Commissioners have conducted 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.*

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 diprasyaratkan berdasarkan ketentuan yang berlaku.

Pada tahun 2025, berdasarkan hasil *self-assessment* tata kelola perusahaan pada Aspek Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris, Bank memperoleh nilai komposit 1 atau "*low*". Hasil penilaian tersebut telah diungkapkan dalam uraian Hasil *Self-Assessment* Tata Kelola Perusahaan (GCG) sebagaimana disajikan dalam Laporan Tahunan ini.

Penilaian Kinerja Komite di bawah Dewan Komisaris

Dewan Komisaris secara berkala melakukan penilaian atas efektivitas kinerja organ pendukungnya, yakni Komite Audit, Komite Remunerasi dan Nominasi, serta Komite Pemantau Risiko. Hal tersebut bertujuan untuk mengetahui realisasi pencapaian target serta mendorong peningkatan performa masing-masing organ. Penilaian tersebut terintegrasi dalam proses *self-assessment* GCG sebagai upaya untuk menilai kesesuaian praktik tata kelola dengan prinsip-prinsip yang berlaku. Adapun kriteria yang digunakan dalam penilaian tersebut, yakni:

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

Performance Evaluation of the Board of Commissioners

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

1. *The performance of the Board of Commissioners, both individually and collectively, must be evaluated and measured at least once a year using other methods, either by internal parties or through third parties. A summary of the evaluation results must be included in the Annual Report.*
2. *A report on the Board of Commissioners' oversight duties during the previous fiscal year must be submitted and approved by the Shareholders at the next Annual General Meeting.*
3. *The report on the results of the self-assessment regarding the implementation of Corporate Governance (GCG) must be submitted to the Financial Services Authority in accordance with applicable regulations, namely twice a year (as of June and December).*
4. *The Board of Commissioners submits a report on the implementation of its supervisory duties regarding the Bank's Work Plan twice a year (as of June and December), no later than two 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 regulations.*

In 2025, based on the results of the corporate governance self-assessment regarding the "Performance of Duties and Responsibilities of the Board of Commissioners," the Bank received a composite score of 1 or "low." These assessment results have been disclosed in the Corporate Governance (GCG) Self-Assessment Results section as presented in this Annual Report.

Performance Assessment of Committees under the Board of Commissioners

The Board of Commissioners periodically evaluates the effectiveness of its supporting bodies—namely the Audit Committee, the Remuneration and Nomination Committee, and the Risk Monitoring Committee. This is done to assess the achievement of targets and to encourage improved performance by each body. This assessment is integrated into the GCG self-assessment process as an effort to evaluate the alignment of governance practices with applicable principles. The criteria used in this assessment are as follows:

1. *The accuracy of reports submitted to the Board of Commissioners;*
2. *The attendance and participation levels of each committee member in meetings; and*
3. *The level of engagement of members during meetings.*

Berdasarkan *self-assessment* atas Aspek Kelengkapan dan Pelaksanaan Tugas Komite sebagai organ pendukung Dewan Komisaris tahun 2025, Bank memperoleh nilai komposit 1 atau "*Low*". Informasi mengenai hasil penilaian tersebut dapat dilihat pada bagian Hasil *Self-Assessment* Tata Kelola Perusahaan (GCG) dalam Laporan Tahunan ini.

Based on the self-assessment of the Committee's adequacy and performance of duties as a supporting body to the Board of Commissioners for 2025, the Bank received a composite score of 1, or "Low." Information regarding the results of this assessment is available in the Corporate Governance (GCG) Self-Assessment Results section of this Annual Report.

Komisaris Independen

Independent Commissioner

Komisaris Independen merupakan anggota Dewan Komisaris yang tidak memiliki hubungan keuangan, hubungan kepengurusan, kepemilikan saham, dan/atau hubungan keluarga dengan anggota Dewan Komisaris lainnya, anggota Direksi, dan/atau pemegang saham pengendali, maupun dengan Bank, yang berpotensi mempengaruhi kemampuannya untuk bertindak secara independen sesuai dengan prinsip-prinsip GCG. Komisaris Independen diangkat melalui RUPS dengan memperhatikan bahwa calon yang diangkat tidak memiliki hubungan afiliasi dengan pihak-pihak yang berkepentingan, khususnya pemegang saham mayoritas, anggota Direksi, dan/atau anggota Dewan Komisaris.

An Independent Commissioner is a member of the Board of Commissioners who has no financial, managerial, shareholding, and/or family ties with other members of the Board of Commissioners, members of the Board of Directors, and/or controlling shareholders, or with the Bank, that could potentially affect their ability to act independently in accordance with the principles of Good Corporate Governance (GCG). Independent Commissioners are appointed through a General Meeting of Shareholders, ensuring that the nominees have no affiliation with interested parties, particularly majority shareholders, members of the Board of Directors, and/or members of the Board of Commissioners.

Pada tahun 2025, Bank Sahabat Sampoerna memiliki 2 (dua) orang Komisaris Independen dari total 4 (empat) orang atau sebesar 50% dari total keseluruhan anggota Dewan Komisaris. Komposisi tersebut telah memenuhi ketentuan sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No. 17 tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 14 tahun 2025 tentang Penerapan Tata Kelola bagi Bank Umum.

As of 2025, Bank Sahabat Sampoerna has 2 (two) Independent Commissioners out of a total of 4 (four) members, or 50% of the total membership of the Board of Commissioners. This composition complies with the provisions set forth in Financial Services Authority Regulation No. 17 of 2023 on the Implementation of Corporate Governance for Commercial Banks and Financial Services Authority Circular Letter No. 14 of 2025 on the Implementation of Corporate Governance for Commercial Banks.

Pernyataan Independensi Komisaris Independen

Statement of Independence of Independent Commissioners

Komisaris Independen Bank Sahabat Sampoerna senantiasa 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:

The Independent Commissioners of Bank Sahabat Sampoerna consistently uphold independence by performing their duties and responsibilities professionally, objectively, and with due diligence, while meeting the independence criteria established by the regulator, as follows:

Aspek Independensi *Aspects of Independence*	**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. *Did not work for or have the authority to plan, lead, control, or supervise the Bank's activities for 6 months prior to his/her appointment, except in his capacity as a reappointed Independent Commissioner.*	v	v
Tidak secara langsung atau tidak langsung memiliki saham di Bank. *Does not directly or indirectly own shares in the Bank.*	v	v
Tidak memiliki hubungan afiliasi dengan Bank atau Pemegang Saham Utama dan Pengendali atau salah satu anggota Dewan Komisaris atau Direksi. *Does not have an affiliation with the Bank or the Major Shareholders and Controlling Parties or any member of the Board of Commissioners or the Board of Directors.*	v	v
Tidak memiliki hubungan kerja/profesional langsung atau tidak langsung dengan Bank. *Has no direct or indirect employment or professional relationship with the Bank.*	v	v

Aspek Independensi *Aspects of Independence*	Khoe Minhari Handikusuma	Anggar Budhi Nuraini
Tidak mempunyai usaha, baik langsung maupun tidak langsung, yang berkaitan dengan kegiatan usaha Bank. *Does not have any business interests, either directly or indirectly, related to the Bank's business activities.*	v	v

v : Terpenuhi | *Fulfilled*
x : Tidak Terpenuhi | *Not Fulfilled*

Mekanisme Pengunduran Diri dan Pemberhentian Dewan Komisaris

Berdasarkan Pedoman dan Tata Tertib Dewan Komisaris, mekanisme dan kriteria pengunduran diri dan/atau pemberhentian Dewan Komisaris adalah sebagai berikut:

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.
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 surat 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.

Mechanism for Resignation and Dismissal of the Board of Commissioners

Pursuant to the Board of Commissioners' Guidelines and Rules of Procedure, the mechanisms and criteria for the resignation and/or dismissal of the Board of Commissioners are as follows:

1. *A member of the Board of Commissioners has the right to resign from his or her position by notifying the Bank in writing of his or her intention no later than 30 (thirty) days prior to the effective date of resignation.*
2. *A member of the Board of Commissioners who resigns before the end of his or her term of office shall remain accountable to the next Annual General Meeting for the performance of supervisory duties conducted from the last accountability report until the effective date of such resignation.*
3. *A member of the Board of Commissioners involved in financial crimes and/or other criminal offenses must resign.*
4. *A member of the Board of Commissioners may resign from their position before the end of their term by providing written notice 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 falling below 3 (three), such resignation shall be valid if it has been approved by the General Meeting of Shareholders and a new member of the Board of Commissioners has been appointed.*
6. *The Financial Services Authority is authorized to evaluate the resignation of a member of the Board of Commissioners to determine whether the resignation was voluntary, involved coercion, or other circumstances.*
7. *If a member of the Bank's Board of Commissioners is dismissed, resigns, or passes away, the Bank must notify the OJK no later than 10 (ten) business days from the date of the dismissal letter, resignation letter, or death certificate, accompanied by supporting documents regarding the dismissal, resignation, and/or death.*
8. *If a Commissioner that has been approved by the OJK has not been appointed within the specified timeframe, the approval issued by the OJK shall become invalid*
9. *The Bank is required to notify the OJK no later than 10 (ten) business days after the effective date of appointment, accompanied by the minutes of the General Meeting of Shareholders or the appointment document from the authorized official of the bank domiciled abroad.*

Direksi

Board of Directors

Direksi adalah organ perusahaan yang bertanggung jawab penuh atas pengurusan dan pengelolaan Bank. Direksi bertugas dan bertanggung jawab secara kolektif kolegial dalam mengelola Bank demi tercapainya tujuan Perseroan dengan tetap tunduk dan patuh terhadap setiap ketentuan yang berlaku. Masing-masing anggota Direksi melaksanakan tugas dan mengambil keputusan sesuai dengan pembagian tugas, wewenang, dan hal-hal lain yang terkait dengan jabatannya sesuai dengan anggaran dasar dan peraturan perundang-undangan yang berlaku.

Setiap anggota Direksi menjalankan tugas dan mengambil keputusan sesuai dengan pembagian tugas dan kewenangan masing-masing, namun seluruh pelaksanaan tugas tersebut tetap menjadi tanggung jawab Direksi secara kolektif. Dalam menjalankan tugas dan tanggung jawab dimaksud, Direksi berada di bawah pengawasan Dewan Komisaris serta bertanggung jawab kepada Pemegang Saham melalui penyelenggaraan RUPS Tahunan.

The Board of Directors is the corporate body that has full responsibility for the administration and management of the Bank. The Board of Directors acts and is collectively responsible for managing the Bank to achieve the Company's objectives, while remaining subject to and complying with all applicable regulations. Each member of the Board of Directors performs duties and makes decisions in accordance with the division of duties, authority, and other matters related to their position, as stipulated in the Articles of Association and applicable laws and regulations.

Each member of the Board of Directors performs duties and makes decisions in accordance with their respective divisions of duties and authority; however, the Board of Directors remains collectively responsible for the overall performance of these duties. In performing these duties and responsibilities, the Board of Directors operates under the supervision of the Board of Commissioners and is accountable to the Shareholders through the Annual General Meeting of Shareholders.

Komposisi Direksi Tahun 2025

Di tahun 2025, susunan dan komposisi Direksi mengalami perubahan berdasarkan Keputusan di Luar RUPS Biasa tanggal 25 November 2025 dimana terdapat perubahan nomenklatur jabatan Bapak Rudy Mahasin yang sebelumnya Direktur Bisnis UMKM menjadi Chief ESME, sementara Bapak Patrick Wong resmi menjabat sebagai Direktur Bisnis. Berdasarkan Keputusan RUPS Tahunan yang ditetapkan dalam Akta No.66 tanggal 17 Desember 2025, jumlah anggota Direksi Bank Sahabat Sampoerna berjumlah 5 (lima) orang. Jumlah tersebut telah memenuhi ketentuan sebagaimana diatur dalam POJK No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, yang mewajibkan setiap bank memiliki paling sedikit tiga anggota Direksi. Susunan anggota Direksi Bank Sahabat Sampoerna hingga akhir tahun 2025 adalah sebagai berikut:

Composition of the Board of Directors for 2025

In 2025, the composition of the Board of Directors underwent changes pursuant to a Circular Resolution of the Annual General Meeting of Shareholders on November 25, 2025, whereby Mr. Rudy Mahasin's title was changed from MSME Business Director to Chief ESME, while Mr. Patrick Wong officially assumed the position of Business Director. Pursuant to the Annual General Meeting Resolution set forth in Deed No. 66 dated December 17, 2025, the Bank Sahabat Sampoerna Board of Directors consists of 5 (five) members. This number complies with the provisions of POJK No. 17 of 2023 on the Implementation of Corporate Governance for Commercial Banks, which requires every bank to have at least three members on its Board of Directors. The composition of the Board of Directors of Bank Sahabat Sampoerna through the end of 2025 is as follows:

Nama *Name*	**Jabatan** *Position*	**Masa Jabatan dan Dasar Pengangkatan** *Term of Office and Basis for Appointment*	**Persetujuan Bank Indonesia/ Otoritas Jasa Keuangan** *Approval from Bank Indonesia/Financial Services Authority*	**Periode Jabatan** *Term of Office*
Ali Rukmijah	Direktur Utama *President Director*	• 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 Resolution of the Extraordinary General Meeting of Shareholders dated May 26, 2023;* • *2020–2023: Circular Resolution of the Extraordinary General Meeting of Shareholders on May 28, 2020;* • *2017–2020: Circular Resolution of the Extraordinary General Meeting of Shareholders on May 22, 2017; and* • *2014–2017: Resolution of the Extraordinary General Meeting of Shareholders dated June 9, 2014.*	No. SR-67/D.03/2014 tanggal 19 Mei 2014 *No. KEP-19/PB.1/2022 dated April 14, 2022*	2023-2026
A. Dendi Hardiansyah	Direktur Kepatuhan & Manajemen Risiko *Compliance & Risk Director*	• 2023-2026: Keputusan di Luar RUPS Luar Biasa tanggal 26 Mei 2023; dan • 2022-2023: Keputusan RUPS Luar Biasa tanggal 9 Mei 2022. • *2023–2026: Circular Resolution of the Extraordinary General Meeting of Shareholders on May 26, 2023; and* • *2022–2023: Resolution of the Extraordinary General Meeting of Shareholders dated May 9, 2022.*	No. KEP-19/PB.1/2022 tanggal 14 April 2022 *No. KEP-19/PB.1/2022 dated April 14, 2022*	2023-2026
Henky Suryaputra	Direktur Keuangan & Perencanaan Bisnis *Finance & Business Planning Director*	• 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 Resolution of the Extraordinary General Meeting of Shareholders on May 26, 2023; and* • *2020–2023: Circular Resolution of the Extraordinary General Meeting of Shareholders 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
Patrick Wong	Direktur Bisnis *Business Director*	2025-2026: Keputusan di Luar RUPS Luar Biasa tanggal 25 November 2025. *2025–2026: Circular Resolution of the Extraordinary General Meeting of Shareholders dated November 25, 2025.*	No. KEPR-208/D.03/2025 tanggal 24 Oktober 2025 *No. KEPR-208/D.03/2025 dated October 24, 2025*	2025-2026
Hendra Rahardja	Direktur *Teknologi Informasi* *Information Technology Director*	2023-2026 : Keputusan di Luar RUPS Luar Biasa tanggal 26 Mei 2023. *2023–2026: Circular Resolution of the Extraordinary General Meeting of Shareholders held on May 26, 2023.*	No. KEPR-105/D.03/2023 tanggal 25 Agustus 2023 *No. KEPR-105/D.03/2023 dated August 25, 2023*	2023-2026

Kriteria Anggota Direksi

Seluruh anggota Direksi wajib memenuhi sejumlah kriteria yang dipersyaratkan sesuai dengan ketentuan perundang-undangan, 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;

Criteria for Members of the Board of Directors

All members of the Board of Directors must meet a number of criteria required in accordance with statutory provisions, including:

1. *Requirements for Board members:*
    a. *Possess good character, morals, and integrity;*
    b. *Be competent to perform legal acts;*
    c. *Within 5 years prior to appointment as a Director, and during their term of office:*
        - *Never have been declared bankrupt;*
        - *Must never have served as 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;*

- Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan;
- 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 kepengurusan/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.

- *Has never been convicted of a criminal offense involving financial loss to the state and/or related to the financial sector;*
- *Has never served as a member of the Board of Directors and/or Board of Commissioners who, during their term of office:*
  » *Failed to hold an Annual General Meeting of Shareholders;*
  » *Had their accountability report rejected by the General Meeting of Shareholders or failed to provide an accountability report as a member of the Board of Directors and/or Board of Commissioners;*
  » *Has caused a company that obtained a license, approval, or registration from the Financial Services Authority to fail to fulfill its obligation to submit an Annual Report and/or Financial Statements to the Financial Services Authority;*
  » *Committed to complying with laws and regulations and supporting OJK policies;*
  » *Possess knowledge and/or expertise in the fields required by the Bank, including:*
    › *Knowledge in the banking sector: understanding of banking regulations and operations, risk management, marketing, accounting, auditing, funding, lending, money markets, capital markets, law, or experience and expertise in the supervision of financial services institutions.*
    › *Ability to perform strategic management, including the ability to anticipate economic, financial, and banking developments; interpret the Bank's vision and mission; and analyze the banking industry landscape.*
    › *Comply with the requirements regarding ownership and management of the Bank as stipulated in applicable laws and regulations.*

d. *Demonstrate a commitment to the development of sound Financial Services Institutions (FSIs);*
e. *Not listed as a party prohibited from becoming a Principal Party;*
f. *Not having any non-performing loans and/or financing; and*
g. *Financial eligibility requirements must be demonstrated by at least:*
   - *having a sound financial reputation;*
   - *possessing financial capacity capable of supporting the business development of the FSI; and*
   - *having a commitment to take the necessary measures should the LJK face financial difficulties.*

- Tidak sedang menjalani konsekuensi hasil akhir dari penilaian kembali pihak Utama dengan predikat tidak lulus dan/atau tidak termasuk dalam daftar tidak lulus.
- 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.

- *Is not currently subject to the final consequences of a reassessment by the Principal Party resulting in a failing grade and/or is not included on the list of those who failed.*
- *Has never been declared bankrupt and/or has never served as a member of the Board of Directors found guilty of causing a company to be declared bankrupt within the 5 (five) years prior to nomination*

2. *A majority of the Board members must have at least 5 (five) years of experience in operations as executive officers of a 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, as well as with controlling shareholders.*
4. *The term "family relations up to the second degree" refers to both vertical and horizontal relationships, including:*
   a. *Biological/step/adoptive parents*
   b. *Biological, step, or adopted siblings, including their spouses*
   c. *Biological, step, or adopted children*
   d. *Biological, step, or adopted grandparents*
   e. *Biological, step, or adopted grandchildren*
   f. *Biological/step/adopted siblings of the parents, including their spouses*
   g. *Spouse*
   h. *Mother/Father In-laws*
   i. *the parents of [his/her] spouse*
   j. *The spouse of a biological, step, or adopted children*
   k. *Grandfather or grandmother of the husband or wife*
   l. *Spouse of a biological, step, or adopted grandchildren*
   m. *Biological, step, or adopted sibling of the husband or wife, along with*
   n. *spouse*
5. *A person who has met the requirements to become a candidate for the position of Director is submitted to the Bank for a selection process (assessment) of the candidate's capabilities, background, suitability, education, character, ethics, and integrity by the Remuneration and Nomination Committee (KRN).*
6. *For candidates who meet the qualifications, the Nomination Committee (KRN) is required to submit a recommendation to the Board of Commissioners for a decision and to be presented to the shareholders through the General Meeting of Shareholders (GMS) and to the OJK to undergo the Fit and Proper Test. The KRN must also prepare an analysis of the assessment results for prospective Board members to be used as one of the requirements for submitting the Director candidates 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. 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.
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;

8. The appointment of members of the Board of Directors must be approved by the General Meeting of Shareholders and must have passed the OJK's Fit and Proper Test, and/or meet other requirements set by relevant authorities before being officially appointed as a Director.
9. A Director-designate who has not yet been declared effective or has not yet obtained OJK approval may not perform the duties and responsibilities of a Director nor make legally binding decisions; consequently, the rights and obligations of a Director do not yet apply to them, even if they have been approved and appointed by the GMS.
10. The appointment of a Director who has been declared effective must be reported to the OJK no later than 10 (ten) business days after the effective date of appointment, accompanied by the minutes of the General Meeting of Shareholders, and the individual concerned must prepare and submit a Statement of the Board of Directors to the Deposit Insurance Corporation in accordance with applicable regulations.
11. Directors who have met the Financial Services Authority's approval requirements during their term of office must possess:
    a. integrity;
    b. competence; and
    c. a 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 former employees or officials of an institution that performs regulatory and/or supervisory functions over banks and/or other financial services institutions shall be made after the individual has effectively ceased to be an employee or official and has completed a waiting period of at least 6 (six) months.
14. Competency requirements must, at a minimum, include knowledge and/or experience relevant to the management of financial services institutions.
15. Members of the Board of Directors are prohibited from serving as members of the audit committee, risk monitoring committee, or remuneration and nomination committee.
16. Regarding the Fit and Proper Test of Director-designate:
    a. The terms include:
        - *A person who has never served as a member of a bank's Board of Directors and is nominated to serve as a member of a bank's Board of Directors;*
        - *A person currently serving as a member of the Board of Directors of a Bank, who is nominated to become a member of the Board of Directors of another Bank;*
        - *A person who has previously served as a member of the Board of Directors of a Bank, who is nominated to become a member of the Board of Directors or a member of the Board of Commissioners at the same Bank or at another Bank;*

- Anggota Dewan Komisaris Bank yang dicalonkan menjadi anggota Direksi pada Bank yang sama;
- Anggota Direksi Bank yang dicalonkan menjadi 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.

- *A member of the Board of Commissioners of a Bank who is nominated to become a member of the Board of Directors of the same Bank;*
- *A member of the Board of Directors of a Bank who is nominated to become the Director overseeing the Compliance Function at the same Bank;*
- *A member of the Board of Directors nominated for a higher position at the same Bank, namely a member of the Board of Directors who is to be appointed as president director/vice president director or the equivalent at the same Bank;*
- *a person nominated to become a member of the Board of Directors at the merged bank who comes from the merging bank;*
- *a person nominated to become a member of the Board of Directors of the resulting bank from a merger, originating from the surviving bank, including term extensions;*
- *a person nominated to become a member of the Board of Directors of the bank resulting from a consolidation who comes from the bank initiating the consolidation.*

b. The extension of a Board member's term of office is reported to the OJK, accompanied by the GMS resolution approving such extension
c. The Bank first prepares a compliance checklist of administrative requirements to be submitted to the OJK, which is conducted by the Compliance Unit. The Bank then submits a request for approval of prospective Board members through the Bank's Board members, accompanied by the required administrative documents.
   - *The application letter and documents are submitted to the Banking Licensing and Information Department of the Financial Services Authority, with a copy to the Banking Supervision Department or the Financial Services Authority Regional Office in Jakarta.*
d. The maximum number of candidates for the Board of Directors that may be nominated in an application is 2 (two) persons for each vacant position, and the nomination of candidates must comply with applicable laws and regulations.
e. OJK may suspend the assessment of the competence and suitability of a candidate for the Board of Directors if, at the time of the assessment, the candidate:
   - *Is currently undergoing legal proceedings*
   - *is currently undergoing a fit and proper assessment at a financial institution is currently undergoing a reassessment due to indications of issues regarding integrity, financial fitness/reputation, and/or competence at a financial institution.*
   - *Currently undergoing a reassessment due to indications of issues regarding integrity, financial fitness/reputation, and/or competence at a financial institution.*

f. Calon anggota Direksi yang dihentikan penilaian kemampuan dan kepatutan, dapat diajukan kembali 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 mendapatkan persetujuan terlebih dahulu dari Otoritas Jasa Keuangan sebelum diputuskan dalam RUPS.

f. A candidate for the Board of Directors whose fitness and propriety assessment has been suspended may be resubmitted to the OJK as a candidate for the Board of Directors if the individual has completed the legal process, as evidenced by:
- *A Letter of Termination of Investigation (SP3)*
- *A court decision that has become final and binding stating that the individual is not guilty*
- *A court decision that has obtained final and binding legal force stating that the person concerned has not been declared bankrupt*
- *Having no issues regarding integrity, financial fitness/reputation, and/or competence have been identified.*

g. A candidate for the Board of Directors who has been designated as "Not Approved" may be resubmitted to the OJK no sooner than 6 (six) months from the date of the OJK's "Not Approved" designation.

h. A candidate for the Board of Directors or the Board of Commissioners who is deemed "Not Approved" due to competency requirements may be resubmitted before the 6 (six) month period if resubmitted for:
- *A different position at the same level or a lower-level position at the same Bank*
- *A position at another bank with a smaller size and lower complexity*
- *A position at a financial institution other than a bank.*

17. Members of the Board of Directors are individuals who meet the requirements for approval by the Financial Services Authority.

18. Any proposal for the replacement and/or appointment of Board members submitted to the General Meeting of Shareholders must take into account the recommendations of the committee responsible for nominations.

19. The replacement and/or appointment of Board members prioritizes professional composition, independence, suitability of competencies, and consideration of diversity, all of which are essential for the proper execution of the Board's duties and responsibilities.

20. The Bank shall stipulate in its articles of association the criteria, mechanisms, and procedures for the appointment, replacement, dismissal, and/or resignation of members of the Board of Directors, including the powers vested in the Board of Directors, in accordance with applicable laws and regulations.

21. To ensure the Bank's compliance with Financial Services Authority regulations, the Bank must have a director overseeing compliance functions and establish a compliance unit

22. The dismissal or replacement of the President Director and/or the director overseeing compliance functions prior to the end of their term of office must first obtain approval from the Financial Services Authority before being decided upon at the General Meeting of Shareholders.

23. 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.
24. 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:
    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
25. 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.
26. 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.
27. 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.

23. Share ownership of members of the Board of Directors, either individually or collectively, resulting from the receipt of bonuses and/or profit-sharing in the form of shares that lead to a shareholding of 25% (twenty-five percent) or more may be exempted.
24. Share ownership of the President Director or the director in charge of compliance arising from bonuses, profit-sharing, management share ownership programs, and/or employee share ownership programs at a company that is a controlling shareholder and/or the ultimate controlling shareholder of the Bank, shall not be taken into account in assessing independence from the controlling shareholder, provided that:
    a. Share ownership is a matter determined by the Bank's controlling shareholders and/or ultimate controllers and is not an initiative of the President Director or the director responsible for compliance functions
    b. The shares are not intended for trading
    c. The individual concerned has submitted a written statement affirming that they will always act independently while serves as President Director or the director overseeing compliance functions, even though they hold shares as a controlling shareholder and/or ultimate controlling shareholder of the Bank
25. Share ownership resulting from bonuses, profit-sharing, management share ownership programs, and/or employee share ownership programs must be evidenced by a resolution of the General Meeting of Shareholders and/or other documents establishing such ownership.
26. Members of the Board of Directors are prohibited from requesting, accepting, permitting, and/or approving the acceptance of rewards, commissions, additional money, services, cash, valuables, and/or anything else of economic value or other benefit, for the personal gain of themselves, their families, or other parties, in the conduct of the Bank's business activities and other activities related to the Bank.
27. Members of the Board of Directors are required to refuse and/or are prohibited from accepting any 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 inconsistent with the implementation of Good Corporate Governance at the Bank;
    b. Commit criminal acts and/or acts indicative of criminal activity
    c. Engage in actions and matters that may harm, potentially harm, and/or reduce the Bank's profits.

Pedoman dan Tata Tertib Direksi

Bank Sahabat Sampoerna telah memiliki Pedoman dan Tata Tertib Kerja Direksi yang ditetapkan melalui Surat Keputusan No. BSS/KK-DIR/CSC/01/2024. Pedoman ini berfungsi sebagai acuan bagi Direksi untuk menjalankan tugas dan tanggung jawabnya dalam melaksanakan pengelolaan perusahaan. Pedoman dan Tata Tertib ini disusun dengan mengacu kepada sejumlah ketentuan dan peraturan perundang-undangan yang berlaku. Adapun pokok-pokok isi Pedoman dan Tata Tertib Kerja Direksi membahas mengenai:

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.

Guidelines and Rules of Procedure for the Board of Directors

Bank Sahabat Sampoerna has established Guidelines and Rules of Procedure for the Board of Directors, which were enacted via Decree No. BSS/KK-DIR/CSC/01/2024. These guidelines serve as a reference for the Board of Directors in performing its duties and responsibilities in managing the company. These Guidelines and Rules of Procedure were drafted in accordance with and in reference to a number of applicable laws and regulations. The main points of the Guidelines and Rules of Procedure for the Board of Directors cover:

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

Independensi Direksi

Seluruh anggota Direksi Bank Sahabat Sampoerna senantiasa melaksanakan tugas dan tanggung jawab pengelolaan Bank dengan menjunjung tinggi prinsip independensi. Komitmen tersebut tercermin dalam pelaksanaan tugas secara profesional, objektif, dan penuh kehati-hatian. Selain itu, Bank memastikan bahwa tidak terdapat benturan kepentingan maupun intervensi dari Pemegang Saham, sehingga Direksi dapat menjalankan tugas dan tanggung jawabnya secara optimal dan efektif.

Independence of the Board of Directors

All members of the Board of Directors of Bank Sahabat Sampoerna consistently execute their duties and responsibilities in managing the Bank while upholding the principle of independence. This commitment is reflected in the professional, objective, and prudent performance of their duties. Furthermore, the Bank ensures that there are no conflicts of interest or interference from Shareholders, so that the Board of Directors can perform its duties and responsibilities optimally and effectively.

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.

Duties, Responsibilities, and Authorities of the Board of Directors

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

1. *The Board of Directors is responsible for managing the Bank in the Bank's best interests, in accordance with the Bank's objectives and purposes as set forth in applicable laws and regulations, the Articles of Association, and resolutions of the General Meeting of Shareholders.*
2. *The Board of Directors must perform its duties, exercise its authority, and fulfill its responsibilities in good faith and with due diligence.*
3. *The Board of Directors is authorized to represent the Bank in accordance with applicable laws and regulations, the Articles of Association, and the decisions of the General Meeting of Shareholders.*
4. *The Board of Directors implements integrated corporate governance, risk management, and compliance practices that are aligned with the latest developments in the banking ecosystem and supported by digitalization and technological innovation.*

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
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 pembidangan 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;

5. In implementing Good Corporate Governance at the Bank, the Board of Directors is required to establish, at a minimum, the following:
   a. An internal audit unit
   b. A risk management unit
   c. Compliance Unit
6. In addition to establishing the units referred to in paragraph (5), the Board of Directors shall establish other units as required by Financial Services Authority regulations.
7. The Board of Directors must follow up on audit findings or inspections 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 and institutions.
8. The Board of Directors shall disclose to employees the Bank's strategic internal policies regarding human resources.
9. The Board of Directors must be accountable for the performance of its duties to shareholders through the General Meeting of Shareholders
10. The Board of Directors is prohibited from engaging individual advisors and/or professional service providers as experts or consultants, except:
    a. for special projects;
    b. based on a clear employment contract;
    c. conducted by an Independent Party possessing specific technical knowledge with adequate professional qualification standards to undertake the special-natured project as referred to in subparagraph (a);
    d. conducted by a party who does not hold a structural position at the Bank; and
    e. conducted 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. maintain and provide accurate, relevant, and timely data and information, including to the Board of Commissioners; and
    b. manage data and information in accordance with the Bank's Good Governance principles and applicable laws and regulations.
12. The Board of Directors must have binding guidelines and rules of procedure for each member of the Board of Directors, which include:
    a. the Bank's organizational structure and the division of duties among the Board of Directors;
    b. the duties, responsibilities, and authorities of the Board of Directors;
    c. regulations regarding the Board of Directors' authority and decision-making procedures;
    d. regulations regarding the Board of Directors' work ethics;
    e. regulations regarding Board meetings;
    f. prohibitions on the Board of Directors;

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;
    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;
    f. memastikan pejabat dan/atau pegawai, khususnya pegawai dari satuan kerja terkait dan pegawai baru, telah mengikuti pelatihan yang berkaitan dengan penerapan program APU, PPT dan PPPSPM sebanyak 1 (satu) kali dalam 1 (satu) tahun;
    g. Memastikan adanya pembahasan terkait penerapan program APU, PPT dan PPPSPM dalam rapat Direksi;
    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 PPSPM serta kegiatan, skala usaha, kompleksitas usaha, dan/atau karakteristik usaha PJK yang mencakup;

        • Pengawasan aktif Direksi dan Dewan Komisaris;

g. evaluation of the Board of Directors' performance; and

h. the framework for the working relationship between the Board of Directors and the Board of Commissioners.

13. Decisions made by the Board of Directors in accordance with guidelines and work procedures are binding and are the responsibility of all members of the Board of Directors.

14. The Board of Directors is obligated to foster and ensure the implementation of a Culture of Compliance at all levels of the Bank's organization and business operations, and must ensure the proper functioning of the Bank's Compliance Function.

15. Regarding Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Financing of the Proliferation of Weapons of Mass Destruction (AML, CTF, and CFWMD), the Board of Directors' active oversight shall include at least the following:

    a. Proposing written policies and procedures regarding the implementation of AML, CFT, and PFWMD programs to the Board of Commissioners;
    b. Ensuring that the implementation of AML, CFT, and PFWMD programs is conducted in accordance with the established written policies and procedures;
    c. Establish a dedicated unit and/or appoint an official responsible for implementing the AML, CFT, and PFWMD programs;
    d. Monitoring the compliance of work units in implementing the AML, CFT, and PFWMD programs;
    e. Ensuring that written policies and procedures regarding the implementation of the AML, CFT, and PFWMD programs are aligned with changes and developments in products, services, and technology in the financial services sector, as well as with evolving methods of money laundering, terrorist financing, and/or the financing of the proliferation of weapons of mass destruction;
    f. Ensuring that officials and/or employees, particularly employees from relevant work units and new employees, have attended training related to the implementation of the AML, CFT, and PFWMD programs at least once a year;
    g. Ensuring that the implementation of the AML, CFT, and PFWMD programs is discussed at Board of Directors meetings;
    h. Reviewing and approving policies, oversight, and procedures for the management and mitigation of AML, CFT, and PFWMD risks, as well as individual risk assessment (Internal Risk Assessment) documents for AML, CFT, and PFWMD at the BSS;
    i. The Bank is required to effectively implement the APUPPT and PPPSPM programs by taking into account the risks of TPPU, TPPT, and/or PPSPM as well as the activities, business scale, business complexity, and/or business characteristics of PJK, which include;

        • *Active oversight by the Board of Directors and Board of Commissioners;*

- Kebijakan dan prosedur;
- Pengendalian intern;
- Sistem 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;
       - 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

- *Policies and procedures;*
- *Internal controls;*
- *Management information systems;*
- *Human resources and training;*

j. The Board of Directors is prohibited from disclosing to Financial Service Users or any other party, either directly or indirectly, in any manner whatsoever, information regarding Suspicious Financial Transactions Related to Terrorism Financing reports that are being prepared or have been submitted to the PPATK;

k. The Board of Directors is prohibited from disclosing to Financial Service Users or other parties, either directly or indirectly, in any manner whatsoever, regarding reports on Suspicious Financial Transactions Related to Terrorism Financing that are being prepared or have been submitted to the PPATK.

16. Regarding the Implementation of Risk Management:
    a. With regard to country risk and transfer risk, the Board of Directors must, at a minimum:
       - *develop and implement strategies for managing transfer risk and country risk in accordance with the Bank's characteristics and complexity;*
       - *set limits and monitor compliance with risk exposure limits;*
       - *develop, establish, 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 developments in country risk and transfer risk and implement appropriate follow-up actions;*
       - *conducting risk controls on risk exposures for each country, which include intragroup exposures, based on specific regions, and transaction counterparties;*
       - *maintain and develop a management information system capable of providing accurate, complete, informative, timely, and reliable data so as to generate adequate reports;*
       - *conduct evaluations and stress tests periodically at least once a year or based on specific conditions that significantly affect the Bank; and*
       - *ensure adequate internal controls and reviews regarding country risk and transfer risk.*
    b. The Board of Directors must prepare and present the results of the identification, measurement, monitoring, and control of country risk and transfer risk in the risk profile report;
    c. The Board of Directors must, at a minimum:
       - *develop policies and procedures for identifying and managing non-performing assets, asset*

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;
- 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:

classification, calculations related to allowances and provisions, and asset write-offs;
- *conducting periodic reviews of asset classifications and provisions for non-performing loans and/or financing, as well as adequately identifying and managing non-performing assets, including provisions commensurate with the risks incurred; and*
- *conduct periodic reviews of established provisions to ensure they align with current conditions, in accordance with standards and applicable laws and regulations.*

d. The Board of Directors has the authority and is responsible for at least;
- *developing comprehensive, written risk management policies and strategies;*
- *be responsible for the implementation of Risk Management policies and the overall risk exposure taken by the Bank;*
- *evaluating and deciding on transactions requiring Board approval;*
- *develop a Risk Management culture across all levels of the organization;*
- *ensuring the enhancement of human resource competencies related to Risk Management;*
- *ensuring that the Risk Management function operates independently; and*
- *conducting periodic reviews to ensure:*
  - » *the accuracy of risk assessment methodologies;*
  - » *the adequacy of the implementation of the Risk Management information system;*
  - » *the appropriateness of Risk Management policies and procedures, as well as the setting of risk limits.*

e. The Board of Directors must have a sufficient understanding of the risks inherent in all of the Bank's functional activities and be able to take the necessary actions in accordance with the Bank's risk profile;

f. To support the effective implementation of risk management at the Bank, the requirement for human resources to hold a Risk Management Certificate——is established, among others, for: members of the Board of Directors;

g. Risk Management Certification for members of the Board of Directors is conducted by a banking sector LSP registered with the Financial Services Authority, which is aligned with:
- *Competency units based on the National Competency Standards (SKKNI) for banking risk management;*
- *Qualification levels that refer to the National Qualifications Framework (KKNI) in the field of banking risk management, while adhering to and taking into account:*

» 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 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;

» *The scope and application of risk management as regulated by the Financial Services Authority, including provisions regarding the application of risk management for commercial banks;*
» *The Bank's business activities, namely conventional business activities, as well as adjustments to current risk developments related to the banking sector, including those related to cybersecurity, climate change, and other emerging risks;*

h. The validity period of the Risk Management Certificate is 3 (three) years from the date of issuance of said certificate, and may be renewed. The validity period of the renewed Risk Management Certificate is 3 (three) years following the expiration of the previous Risk Management Certificate;
i. Possession of a Risk Management Certificate is one of the competency factors considered in the assessment of the competence and suitability of prospective Board members, in accordance with the Financial Services Authority's regulations regarding the assessment of competence and suitability for key personnel of financial services institutions;
j. If a member of the Board of Directors fails to maintain a valid Risk Management Certificate during their term of office and/or fails to make efforts to maintain such a certificate, the Bank must replace the member of the Board of Directors no later than:
   - *Within 6 (six) months from the expiration of the Risk Management Certificate. During that period, the Board member in question may make efforts to ensure the validity of the Risk Management Certificate; or*
   - *Within a period of 6 (six) months from the date of the Financial Services Authority's decision regarding the validity of the Risk Management Certificate to meet certain conditions set by the Financial Services Authority. During this period, the relevant member of the Board of Directors may take steps to ensure the validity of the Risk Management Certificate. These conditions are based, among other things, on the consideration that a change in the membership of the Board of Directors would 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 of a Financial Institution ( ) are unable to meet the requirements for a Risk Management Certificate within the specified timeframe, the Financial Services Authority may set an alternative timeframe, taking into account the efforts already made to obtain the Risk Management Certificate;

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:
     - » 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

l. The criteria for implementing the fast-track program in the Risk Management Certification competency test are as follows:
   - *Applies to individuals to be nominated for the position of member of the Board of Directors, whether or not they have been appointed at a general meeting of shareholders, as evidenced by a cover letter for the competency assessment application signed by a member of the Board of Directors; if a member of the Board of Directors is unable to or refuses to sign the cover letter, the following must be attached:*
     - *» A resolution 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;*
     - *» Recommendations of the Remuneration and Nomination Committee regarding candidates nominated as members of the Board of Directors who have not yet been appointed by the general meeting of shareholders.*
   - *Consider the work capabilities or competencies of the party to be nominated for the position of Board member in relation to:*
     - *» Profile, namely work experience or portfolio in the financial sector or at financial authorities;*
     - *» Characteristic, namely specific character traits, values, or other specific qualities that may be considered relevant to the Bank; and/or*
     - *» Specialized competencies.*

m. For candidates nominated for a position on the Board of Directors, the fast-track program that meets the criteria may only be undertaken by the candidate on a single occasion during the Risk Management Certification competency assessment at the banking sector's LSP;

n. If a candidate for the Board of Directors has participated in the fast-track program for the Risk Management Certification competency assessment at the banking sector LSP and received an "incompetent" result (failed), then the individual:
   - *May take the Risk Management Certification competency test conducted in a tiered (standard) manner*
   - *May not enroll in the next acceleration (fast-track) program at the same banking sector LSP or at another banking sector LSP for the Risk Management Certification competency assessment*

o. For members of the Board of Directors who previously held office and are still serving at the Bank at the time the Risk Management Certification scheme based on the latest KKNI has taken effect or has been validated and/or verified by the competent

(Badan Nasional Sertifikasi Profesi), dilakukan penyelarasan terhadap kepemilikan Sertifikat Manajemen Risiko:
- Area penyelarasan lebih difokuskan untuk unit kompetensi baru dari SKKNI dan KKNI di bidang manajemen risiko perbankan dibandingkan SKKNI dan KKNI sebelumnya;
- Mekanisme dan metode penyelarasan 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 penyelarasan 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 penyelarasan yang lebih difokuskan untuk unit kompetensi baru dalam SKKNI dan KKNI, termasuk unit kompetensi lain yang masih perlu dipenuhi. Setelah dilakukan penyelarasan, yang bersangkutan memenuhi kompetensi pada jenjang kualifikasi 7;
- Dalam pelaksanaan penyelarasan, dilakukan melalui koordinasi antar LSP sektor perbankan dan dilaksanakan dalam periode waktu yang sama.

p. Bagi calon anggota Direksi, penyelarasan 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 penyelarasan 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;

authority (National Professional Certification Agency), alignment of Risk Management Certificate ownership shall be conducted:
- *The alignment process focuses more on new competency units from the SKKNI and KKNI in the field of banking risk management compared to the previous SKKNI and KKNI;*
- *The mechanisms and methods for alignment are established by the banking sector's LSP in coordination with the Financial Services Authority, subject to the following conditions:*
  - » *For directors holding a Level 5 Risk Management Certificate or an equivalent Level 7 qualification, alignment is conducted with a greater focus on new competency units within the SKKNI and KKNI;*
  - » *For holders of a Level 4 Risk Management Certificate or its equivalent at Qualification Level 6, a Level 3 certificate or its equivalent at Qualification Level 5, and a Level 2 certificate or its equivalent at Qualification Level 5, the alignment process is more focused on new competency units within the SKKNI and KKNI, including the unit and other competencies that still need to be met. After alignment, the individual meets the competencies at Qualification Level 7;*
- *The alignment process is executed through coordination among LSPs in the banking sector and implemented within the same timeframe.*

p. *For prospective members of the Board of Directors, verification of Risk Management Certificate ownership is conducted by the banking sector's LSP;*

q. *Possession of a valid Risk Management Certificate prior to the implementation of the Risk Management Work Competency Certification scheme based on SKKNI and KKNI remains recognized in the assessment of competence and suitability for prospective Board members provided that:*
- *Possession of the Risk Management Certificate meets the requirements in accordance with the PBI on Risk Management Certification and equivalence has been established;*
- *In the event that, after such equivalence is conducted, the holder does not meet the qualification levels established for Board members in accordance with the KKNI:*
  - » *Compliance with the requirements, including through alignment with the possession of a Risk Management Certificate, may be fulfilled no later than 6 (six) months after the t is appointed as a member of the Board of Directors;*
  - » *The Financial Services Authority may set a different timeframe, taking into account, among other things, the efforts already made to meet the requirements or the composition of the Bank's management;*

- » 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 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

- » *If a member of the Board of Directors has not met the qualification requirements established for Board members under the KKNI within the specified timeframe, the Bank must replace that member at the next general meeting of shareholders.*

r. Regarding Qualification Level 7 in Banking Risk Management, the Board of Directors is required to possess the expertise to plan the implementation of risk management and manage the resources under their responsibility, and to comprehensively evaluate the implementation of risk management in accordance with applicable laws and regulations, best practices, and the organization's standards and operating procedures to develop enterprise-wide strategic risk management initiatives.

s. Regarding Qualification Level 7 in the Risk Management Division, it requires the ability to solve problems in risk management through a multidisciplinary approach, as well as the ability to conduct research and make strategic decisions with full accountability and responsibility for all aspects of risk management falling under the scope of their area of expertise.

t. Board members foster a culture of continuous learning to enhance knowledge of banking and the latest developments in finance or other fields that support the performance of duties and responsibilities at all levels of the organization.

u. The Board of Directors appoints committee members based on the decision of the Board of Commissioners.

v. Any decisions made by the Board of Directors at a meeting may be implemented and must be in accordance with applicable policies, guidelines, and work procedures.

w. The Board of Directors communicates to employees regarding the Bank's business direction in order to achieve the Bank's mission and vision

x. Members of the Board of Directors continuously enhance their knowledge, expertise, and capabilities in managing the Bank, as evidenced by improved individual performance in line with their duties and responsibilities, enhanced Bank performance, resolution of challenges faced by the Bank, and the achievement of results in line with the expectations of the Bank's stakeholders.

y. Members of the Board of Directors continue to foster a culture of continuous learning to enhance their knowledge of banking and the latest developments in the financial sector or other fields relevant to their duties and responsibilities, as evidenced by increased participation in banking certification 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;
        - 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;

programs and/or education or training aimed at individual professional development.

17. Regarding the Implementation of Information Technology Risk Management, the Board of Directors:
    a. Establish the Bank's Information Technology Strategic Plan and policies regarding the use of Information Technology;
    b. Establishing appropriate policies, standards, and procedures related to the implementation of information technology and communicating them effectively to both the implementing units and the users of information technology;
    c. Ensuring:
        - *The Information Technology used by the Bank supports the Bank's business development, the achievement of the Bank's business objectives, and the continuity of service to the Bank's customers;*
        - *There are human resource competency development activities related to the implementation and use of Information Technology;*
        - *The availability of an effective information security management system and its communication to both user units and IT operational units;*
    d. The implementation of risk management processes in the use of information technology is executed adequately and effectively;
    e. Information Technology policies, standards, and procedures are effectively implemented in user units and Information Technology service providers;
    f. There is a performance measurement system for the Information Technology management process that, at a minimum, supports the monitoring of strategy implementation; supports the completion of Information Technology development projects; optimizes the utilization of human resources and investments in infrastructure; and improves the performance of the Information Technology management process and the quality of service in delivering process results to Information Technology users.
    g. The Bank must establish clear authorities and responsibilities for the Board of Directors and officers at every level of the organization related to the implementation of IT governance.
    h. The Board of Directors has the authority and responsibility to:
        - *evaluate strategic objectives, direct the Bank's executive officers, and monitor all IT operations to ensure:*
            » *the implementation of IT governance aligns with the Bank's needs and characteristics;*
            » *the overall effectiveness and efficiency of IT operations to provide optimal benefits for the 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.
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 perundang-undangan.
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

» *the effective implementation of risk management processes in IT operations;*
» *the availability of adequate resources related to IT operations to support the Bank's business effectively and efficiently; and*
» *stakeholder support and engagement in the implementation of IT governance.*

i. The Bank establishes an IT steering committee, which must include at least: the director overseeing the IT operations unit, the director overseeing the risk management unit, the senior official leading the IT operations unit, and the senior official leading the IT user unit.
j. The IT steering committee is chaired by one of the Bank's directors who also serves as a member.
k. The Board of Directors establishes guidelines for IT management activities to achieve the Bank's business objectives.

18. In the event that the Board of Directors consists of only one director, the duties and responsibilities of the director overseeing compliance functions shall be executed by the head of the Bank's compliance unit for a maximum period of six months.
19. The position of acting director may not be filled by anyone other than a current member of the Board of Directors, except as required by applicable laws and regulations.
20. The scope of duties of the director performed by the acting director shall apply for a maximum period of 6 (six) months.
21. If necessary, the assignment of duties to the acting director may be extended based on specific considerations by the Bank and upon approval by the Financial Services Authority.
22. The Bank must ensure the availability and adequacy of internal reporting, supported by an adequate management information system, to enhance the quality of the Board of Directors' decision-making process and the quality of the Board of Commissioners' oversight process.
23. The corporate plan must be prepared by the Board of Directors and approved by the Board of Commissioners.
24. In the event of external and internal conditions that significantly affect the Bank's objectives and strategies as set forth in the current corporate plan, the Bank may amend the corporate plan.
25. Amendments 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 the Bank must implement the Business Plan effectively.
27. The Board of Directors is required to prepare a Sustainable Finance Action Plan, which must be approved by the Board of Commissioners

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 Pelindungan Konsumen Direksi wajib;
    a. bertanggung jawab atas kepatuhan pelaksanaan Pelindungan Konsumen
    b. Direksi wajib 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
        - Pejabat yang menjalankan fungsi atau unit pelindungan 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.

28. The Board of Directors of the Financial Institution shall assign the Financial Literacy function or unit to develop an activity plan aimed at improving financial literacy and to prepare a report on the implementation of activities aimed at improving financial literacy.
29. The Board of Directors of PUJK shall assign the Financial Inclusion function or unit to develop an activity plan aimed at improving Financial Inclusion and to prepare a report on the implementation of activities aimed at improving Financial Inclusion.
30. Regarding Consumer Protection, the Board of Directors is required to:
    a. be responsible for ensuring compliance with consumer protection regulations
    b. The Board of Directors must appoint:
        - *A member of the Board of Directors or an official of equivalent rank under the Board of Directors at the head office and*
        - *Officials and/or employees at each office other than the head office who manage consumer protection functions or units*
        - *Officials who perform the functions or manage the consumer protection units referred to herein are directly responsible to the relevant Board of Directors*
        - *The Board of Directors is prohibited from enriching or benefiting themselves or any other party*
        - *The Board of Directors is prohibited from abusing the authority, opportunities, or resources available to them by virtue of their position or status, which results in harm to consumers.*
    c. The Bank shall be liable for any losses incurred by the Consumer as a result of errors, negligence, and/or acts that violate the provisions of laws and regulations in the financial services sector, committed by the Board of Directors, the Board of Commissioners, Employees, and/or third parties acting on behalf of or in the interest of the Bank
    d. The Board of Directors signs a printed cover letter for the submission of plan reports, implementation reports, report adjustments, and report revisions related to Financial Literacy and Financial Inclusion, complaint handling reports, and self-assessment reports—whether submitted offline and/or online—prior to their submission to the OJK.
    e. The Board of Directors receives reports on the implementation of Consumer and Public Protection and provides recommendations for the improvement and development of Consumer and Public Protection for the Consumer Protection Function or Unit.
    f. Banks are required to prepare and submit a Complaints Handling Report and a self-assessment to the Financial Services Authority through the Board of Directors.

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:
    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 disampaikan kepada Otoritas Jasa Keuangan secara Semesteran
    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

g. The Board of Directors must possess adequate capacity to provide services regarding the use of products and/or services.
h. The Board of Directors is responsible for ensuring compliance with Financial Services Authority regulations by appointing a member of the Board of Directors, or an official of equivalent rank under the Board of Directors at the head office, and officials and/or employees at each branch office other than the head office, to oversee the Consumer Protection function or unit

31. Regarding the Provisions on the Provision of Customer Data, the Board of Directors may:
    a. In civil cases between a bank and its customers, the Board of Directors may inform the court of the financial condition of the customer in question and may provide other information relevant to the case.
    b. In civil cases between customers, the Board of Directors must inform the court of the customer's financial condition and other information relevant to the case upon request by the chief judge of a district court, the chief judge of a high court, or the Chief Justice of the Supreme Court.
    c. For the purpose of exchanging information between banks, the Board of Directors may disclose the financial condition of its customers to other banks.
32. The director overseeing the Compliance Function is required to submit a report to the Financial Services Authority regarding the performance of his or her duties, including:
    a. The compliance work plan included in the Bank's Business Plan
    b. Compliance reports are submitted to the Financial Services Authority on a semi-annual basis
    c. Special reports regarding policies and/or decisions of the Board of Directors that, in the opinion of the director overseeing the Compliance Function, have deviated from the provisions of the Financial Services Authority and/or applicable laws and regulations.
33. Pursuant to Law No. 40 of 2007 on Limited Liability Companies,
    a. the Company's Board of Directors is required to maintain and keep a list of shareholders, which must include at least:
        - *The names and addresses of the shareholders;*
        - *The number, serial numbers, and dates of acquisition of the shares held by shareholders, and their classification if more than one class of shares has been issued;*
        - *The amount paid up on each share;*
        - *The name and address of the individual or legal entity holding a pledge over the shares or acting as the beneficiary of a fiduciary security interest in the shares, and the date of acquisition of the pledge or the date of registration of such fiduciary security interest*

- 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 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.

- *Details of share contributions in other forms*

b. The Company's Board of Directors shall maintain a special register containing details regarding the shares held by members of the Board of Directors and the Board of Commissioners, as well as their family members, in the Company and/or in other companies, along with the dates on which such shares were acquired.

c. The Board of Directors is required to record the transfer of rights to shares, the date, and the day of such transfer in the shareholder register or special register and notify the Minister of changes in the composition of shareholders for recording in the Company's register within 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 prior to the commencement of the upcoming fiscal year.

- *The articles of association may stipulate that work plans submitted by the Board of Directors must be approved by the Board of Commissioners or the General Meeting of Shareholders.*
- *In the event that the Board of Directors does not submit a work plan, the work plan from the previous year shall apply.*

34. The Board of Directors shall submit the annual report to the General Meeting of Shareholders for review by the shareholders after it has been examined by the Board of Commissioners and signed by all members of the Board of Directors and all members of the Board of Commissioners in office during the relevant fiscal year, no later than 6 (six) months after the Company's fiscal year ends.

a. If any member of the Board of Directors fails to sign the annual report, that person must state the reason in writing, or the reason must be stated by the Board of Directors in a separate letter attached to the annual report.

b. If a member of the Board of Directors does not sign the annual report and does not provide a written reason, that person is deemed to have approved the contents of the annual report.

35. The Board of Directors is required to submit financial statements to a public accountant for audit if the Company's business activities involve raising and/or managing public funds, the Company issues debt instruments to the public, the Company has assets and/or total revenue of at least Rp50,000,000,000, or as required by applicable laws and regulations. The Board of Directors shall also submit the results of the public accountant's audit report to the General Meeting of Shareholders in writing.

a. In the event that the financial statements provided are found to be incorrect and/or misleading, members of the Board of Directors and members of the Board of Commissioners shall be jointly and severally liable to the aggrieved party.

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.
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.
    a. Dalam hal Direksi terdiri atas 2 (dua) anggota Direksi atau lebih, pembagian tugas dan wewenang pengurusan di antara anggota Direksi ditetapkan berdasarkan keputusan RUPS.
    b. 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.
    a. 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.
    a. 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.
    b. Perbuatan hukum yang telah dilakukan untuk dan atas nama Perseroan oleh anggota Direksi sebelum

b. Members of the Board of Directors and members of the Board of Commissioners shall be relieved of liability if it is proven that the circumstances were not due to their fault.

36. The Board of Directors shall convene the Annual General Meeting of Shareholders and other General Meetings of Shareholders following the issuance of a notice of the General Meeting; the Board of Directors is required to issue such a notice within no later than 15 days from the date the request to convene the General Meeting is received. The Board of Directors shall also notify shareholders prior to convening the General Meeting.
37. In voting, members of the Board of Directors are prohibited from acting as proxies for shareholders.
38. The Board of Directors manages the Company for the benefit of the Company and in accordance with the Company's objectives and purposes.
39. A company whose business activities involve raising and/or managing public funds, a company that issues debt securities to the public, or a public company must have at least 2 (two) members of the Board of Directors.
    a. If the Board of Directors consists of 2 (two) or more members, the division of duties and management authority among the members of the Board of Directors shall be determined by a resolution of the General Meeting of Shareholders.
    b. If the GMS does not determine such distribution, the division of duties and authority among Board members shall be determined by a resolution of the Board of Directors.
40. Members of the Board of Directors are appointed by the General Meeting of Shareholders for a specific term and may be reappointed.
41. In the event of the appointment, replacement, or dismissal of a member of the Board of Directors, the Board of Directors is required to notify the Minister of such changes to the Company's roster within a period of no later than 30 (thirty) days from the date of the General Meeting of Shareholders' resolution.
    a. This notification does not include a notification submitted by the new Board of Directors regarding its own appointment.
42. The appointment of a member of the Board of Directors who does not meet the legal requirements shall be deemed invalid from the moment another member of the Board of Directors or the Board of Commissioners becomes aware of the failure to meet such requirements.
    a. Within a period of no later than 7 (seven) days from the date of such knowledge, the other members of the Board of Directors or the Board of Commissioners must announce the revocation of the appointment of the relevant member of the Board of Directors in a newspaper and notify the Minister for entry in the Company's registry.
    b. Legal acts performed for and on behalf of the Company by a member of the Board of Directors

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.
    a. Setiap anggota Direksi bertanggung jawab penuh secara pribadi atas kerugian Perseroan apabila yang bersangkutan bersalah atau lalai menjalankan tugasnya.
    b. Jika Direksi terdiri atas 2 (dua) anggota Direksi atau lebih, tanggung jawab berlaku secara tanggung renteng bagi setiap anggota Direksi.
        - 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

prior to the revocation of their appointment shall remain binding and shall be the responsibility of the Company.

43. The Board of Directors is responsible for the management of the Company and must perform its duties in good faith and with full responsibility.
    a. Each member of the Board of Directors is personally and fully liable for any losses incurred by the Company if such member is at fault or negligent in the performance of their duties.
    b. If the Board of Directors consists of 2 (two) or more members, liability applies jointly and severally to each member of the Board of Directors.
        - *A member of the Board of Directors shall not be held liable for the Company's losses if they can prove: that such losses were not due to their fault or negligence*
        - *they have managed the Company in good faith and with due care for the benefit of and in accordance with the Company's objectives and purposes*
        - *has no direct or indirect conflict of interest regarding management actions that result in losses*
        - *have taken measures to prevent the occurrence or continuation of such losses.*

44. The Board of Directors represents the Company both in and out of court. In the event that the Board of Directors consists of more than 1 (one) person, each member of the Board of Directors is authorized to represent the Company, unless otherwise specified in the Articles of Association.
    a. The Board of Directors' authority to represent the Company is unlimited and unconditional, unless otherwise provided for in this Act, the Articles of Association, or a resolution of the General Meeting of Shareholders.

45. A member of the Board of Directors is not authorized to represent the Company if there is a court case between the Company and the relevant member of the Board of Directors, or if the relevant member of the Board of Directors has a conflict of interest with the Company.
    a. If such a situation arises, the person authorized to represent the Company shall be another member of the Board of Directors who has no 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 General Meeting of Shareholders 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 must obtain the approval of the General Meeting of Shareholders to transfer the Company's assets or pledge the Company's assets as collateral for debt; where such transfer or pledge constitutes more than 50% (fifty percent) of the Company's total net assets in one (1) transaction or more, whether related or unrelated. This provision does 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.
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 kepailitan 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.

not apply to the transfer or use of the Company's assets as collateral by the Board of Directors in the course of conducting the Company's business in accordance with its Articles of Association.

47. The Board of Directors may grant written authority to one or more employees of the Company or to other persons to perform certain legal acts for and on behalf of the Company.
48. Members of the Board of Directors may be removed at any time by a resolution of the General Meeting of Shareholders, stating the reasons therefor. This resolution shall be adopted after the person concerned has been notified in advance of the proposed removal and given the opportunity to defend themselves at the General Meeting of Shareholders; however, this is not required if the person concerned has no objection to the removal.
49. In the event of the Company's dissolution (due to a resolution of the General Meeting of Shareholders or the expiration of the term of existence specified in the Articles of Association) or the lifting of bankruptcy pursuant to a commercial court decision, the Board of Directors shall act as liquidators if the General Meeting of Shareholders does not appoint liquidators.
    a. The Board of Directors may not enter into any new legal transactions on behalf of the Company if the term of the Company's existence as set forth in the Articles of Association has expired.
50. The Board of Directors shall disclose to employees the Bank's strategic policies regarding human resources, which shall be communicated through channels known to or easily accessible by employees
51. The Board of Directors is prohibited from granting general power of attorney to third parties that results in the delegation of the Board's duties and functions
52. All decisions of the Board of Directors are made in accordance with the guidelines and rules of procedure, which are binding and the responsibility of all members of the Board of Directors. In the event of a dissenting opinion, it shall be clearly stated in the minutes of the Board of Directors' meeting along with the reasons for the dissent. In this regard, a copy of the minutes of the Board of Directors' meeting, 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 operational units of the Bank, are part of the Bank's governance structure.
54. The Board of Directors signs a self-assessment report on the implementation of corporate governance.

Pembagian Tugas Antar Direksi

Agar Direksi dapat menjalankan tugas dan tanggung jawabnya dengan lebih optimal, Bank telah menetapkan pembagian tugas dan tanggung jawab untuk masing-masing anggota Direksi sesuai dengan keahliannya masing-masing serta melakukan peninjauan dan pembaharuan atas pembagian peran dan tanggung jawab ini dari waktu ke waktu.

Division of Duties Among Board Members

To enable the Board of Directors to perform its duties and responsibilities more effectively, the Bank has established a division of duties and responsibilities for each member of the Board of Directors in accordance with their respective expertise, and reviews and updates this division of roles and responsibilities from time to time.

Direktur Utama *President Director*	
Sisi Finansial *Financial Aspects*	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. *Managing and ensuring the achievement of the Bank's business targets and quality, including but not limited to the growth of the loan portfolio and third-party funds, as well as other targets set forth in the Bank's Business Plan.*
Sisi Nasabah *Costumer Aspects*	Mengendalikan, mengawasi, dan menjalankan fungsi hubungan masyarakat terkait pengenalan Bank kepada masyarakat umum. *Managing, overseeing, and performing public relations functions related to promoting the Bank to the general public.*
Sisi SDM *Human Resources Aspects*	• Mengendalikan dan mengawasi kegiatan pengelolaan dan pengembangan sumber daya manusia, dengan menyeimbangkan antara Visi dan Misi Bank, best practice 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. • *Managing and overseeing human resources management and development activities, balancing the Bank's Vision and Mission, general best practices, and applicable laws and regulations.* • *Controlling and supervising the delegation of authority to officers or functions authorized to act on behalf of the Bank, including but not limited to credit approval authority, human resources management, expense authorization, and the Bank's oversight and control.*
Sisi Proses *Process Aspects*	• 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). • *Overseeing and supervising the development and implementation of policies, procedures, and operational guidelines across all functions in alignment with the Bank's established strategy, including but not limited to matters related to risk management, know-your-customer principles, and the prevention of suspicious transactions.* • *Monitoring and ensuring the Bank's compliance with all applicable regulations, as well as with agreements and commitments entered into by the Bank with third parties.* • *Establishing a risk management framework through the formation of committees supporting risk management.* • *Monitoring and managing risk management functions based on risk management policies and procedures, including designing risk management operational models.* • *Responsible for the accuracy and validity of data reported on the Bank's internal control activities to relevant parties (including, but not limited to, Bank Indonesia, shareholders, and other external entities).*

Direktur Keuangan & Perencanaan Bisnis *Finance & Business Planning Director*	
Sisi Finansial *Financial Aspects*	Memimpin pengelolaan operasional keuangan dan perencanaan bisnis, termasuk dan tidak terbatas terhadap pengembangan produk-produk Bank. *Leading the management of financial operations and business planning, including but not limited to the development of the Bank's products.*
Sisi Nasabah *Costumer Aspects*	Merumuskan arahan strategis yang sejalan dengan Visi dan Misi Bank untuk memastikan pengelolaan, pertumbuhan, dan pencapaian keuangan sesuai dengan perencanaan bisnis. *Formulating strategic directions aligned with the Bank's Vision and Mission to ensure financial management, growth, and achievement in line with business planning.*
Sisi SDM *Human Resources Aspects*	• 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. • *Responsible for supervising officials/employees in each division within the scope of their duties.* • *Responsible for managing and developing the careers and competencies of human resources within their scope of work.*
Sisi Proses *Process Aspects*	• 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 good corporate governance (GCG). • *Responsible for preparing work plans and budgets for the Finance and Business Planning Function, including monitoring and overseeing the implementation of these work plans and budgets.* • *Managing and ensuring the achievement of targets and the quality of work outcomes.* • *Controlling and overseeing the development 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 principles, and the prevention of suspicious transactions.* • *Ensuring compliance with all internal regulations, including monitoring the effective implementation of internal controls executed by the Internal Audit function and monitoring the follow-up on findings from both internal and external audits.* • *Overseeing and leading the management of the Bank's business and financial relationships and/or transactions while adhering to the principles of prudence and good corporate governance (GCG).*

Direktur Teknologi Informasi *Information Technology Director*	
Sisi Finansial *Financial Aspects*	Mengelola kegiatan operasional Bank dan penyediaan sistem teknologi informasi dalam upaya mendukung kebutuhan bisnis dan pelaksanaan penerapan manajemen risiko. *Managing the Bank's operational activities and the provision of information technology systems to support business needs and the implementation of risk management.*
Sisi Nasabah *Costumer Aspects*	Mengendalikan, mengawasi, dan menjalankan fungsi untuk menjaga tingkat kepuasan nasabah kepada layanan Bank secara umum. *Controlling, supervising, and performing functions to maintain customer satisfaction with the Bank's services in general.*
Sisi SDM *Human Resources Aspects*	• 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. • *Responsible for supervising officials/employees in each division within the scope of their duties.* • *Responsible for managing and developing the careers and competencies of human resources within their scope of work, including but not limited to matters related to risk management and compliance.*
Sisi Proses *Process Aspects*	• 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). • *Controlling and overseeing the formulation and implementation of policies, procedures, and work guidelines related to the Bank's operational activities, transactions, and information technology systems.* • *Responsible for the Bank's operational activities in support of business needs and the implementation of risk management.* • *Overseeing and monitoring the Bank's overall operational activities, including transactional activities as well as the accuracy and security of the technology systems used to support all operational and transactional activities.* • *Designing, establishing, and evaluating the overall information technology system to create an integrated system that can be operated effectively and efficiently to support business needs and the implementation of risk management.* • *Sharing responsibility for the implementation of risk management policies and risk exposures undertaken by the Bank as a whole, particularly regarding operational activities and technology systems.* • *Reporting on the Bank's operational activities to stakeholders (including, but not limited to, Bank Indonesia, shareholders, and other external entities).*

Direktur Bisnis *Business Director*	
Sisi Finansial *Financial Aspects*	• Mengelola dan memastikan pencapaian target dan kualitas bisnis kredit mikro. • Mengelola inisiatif perancangan bisnis dan produk baru Bank. • *Managing and ensuring the achievement of microcredit business targets and quality.* • *Managing the Bank's new business and product development initiatives*
Sisi Nasabah *Costumer Aspects*	Mengelola dan memastikan pertumbuhan portofolio kredit mikro yang sehat dan berkualitas baik, serta portofolio untuk bisnis dan produk baru lainnya. *Managing and ensuring the growth of a healthy, high-quality microcredit portfolio, as well as portfolios for other new businesses and products.*
Sisi SDM *Human Resources Aspects*	• 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. • *Responsible for supervising officers/employees in each division within the scope of their duties.* • *Responsible for managing and developing the careers and competencies of human resources within their scope of work, including but not limited to aspects related to risk management and compliance.*
Sisi Proses *Process Aspects*	• *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.* • *Controlling and overseeing the formulation and implementation of policies, procedures, and work guidelines related to microfinance, business development, and new products.* • *Providing input on the Bank's credit policies and products, based on business evaluations and market needs.*

Direktur Kepatuhan & Manajemen Risiko *Compliance & Risk Director*	
Sisi Finansial *Financial Aspects*	• Mengelola aspek kepatuhan dan manajemen risiko Bank dalam upaya mendukung kebutuhan bisnis, termasuk: • 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. • *Managing the Bank's compliance and risk management aspects to support business needs, including:* • *Managing the risks faced by the Business Division, including but not limited to compliance risks, legal risks, strategic risks, credit risks, operational risks, market risks, liquidity risks, and reputational risks; and* • *Building and managing the Bank's business resilience.*
Sisi Nasabah *Costumer Aspects*	Mengelola dan memantau kondisi pasar dan nasabah melalui hasil analisa riset pasar dan nasabah. *Managing and monitoring market and customer conditions through the results of market and customer research analysis.*
Sisi SDM *Human Resources Aspects*	• 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. • *Responsible for supervising officers/employees in each division within the scope of their duties.* • *Responsible for the management and development of HR careers and competencies within the scope of their work, including but not limited to matters related to risk management and compliance.*
Sisi Proses *Process Aspects*	• 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. • *Proposing, managing, and overseeing the development and implementation of policies, procedures, systems, and work guidelines for each function in line with the Bank's established strategy, and ensuring that the Bank's business activities comply with the regulations of the Financial Services Authority (OJK), Bank Indonesia, and applicable laws and regulations, including but not limited to matters related to risk management, know-your-customer principles, and the prevention of suspicious transactions.* • *Monitoring and ensuring the Bank's compliance with all applicable regulations, as well as with agreements and commitments entered into by the Bank with third parties.* • *Establishing a risk management framework through the formation of committees supporting risk management.* • *Monitor and manage risk management activities in accordance with risk management policies and procedures, including designing risk management operational models.* • *Ensuring the accuracy and validity of data in reports on the Bank's internal control activities submitted to stakeholders (including, but not limited to, Bank Indonesia, Shareholders, and other external entities).* • *Formulating strategies to foster a culture of compliance.*

Benturan Kepentingan

Dalam rangka menerapkan prinsip kehati-hatian, pengelolaan risiko, serta pemenuhan ketentuan regulasi yang berlaku, dimana Bank wajib melakukan identifikasi, evaluasi, dan pemantauan atas transaksi terkait dengan benturan kepentingan guna mencegah konflik kepentingan dan menjaga integritas Bank dalam membangun dan menjalin kerja sama dengan Pihak-Pihak Terkaitnya dan pelaksanaan identifikasi dan pemantauan transaksi dengan Pihak Terkait dilakukan secara efektif, terdokumentasi, dan terkoordinasi sesuai dengan ketentuan regulator dan prinsip tata kelola perusahaan yang baik. Hal ini sejalan dengan dimilikinya ketentuan Internal Bank terkait dengan Benturan Kepentingan.

Conflicts of Interest

In order to apply the principles of prudence, risk management, and compliance with applicable regulations—under which the Bank is required to identify, evaluate, and monitor transactions involving conflicts of interest to prevent such conflicts and uphold the Bank's integrity in establishing and maintaining cooperation with Related Parties, and the identification and monitoring of transactions with Related Parties are executed effectively, in a documented and coordinated manner in accordance with regulatory requirements and the principles of good corporate governance. This is consistent with the Bank's internal policies regarding conflicts of interest.

Selain itu pengelolaan benturan kepentingan diatur di dalam Pedoman dan Tata Tertib Direksi telah 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.

In addition, the management of conflicts of interest is governed by the Board of Directors' Guidelines and Rules of Procedure, which address the conflict-of-interest policy for Board members, including:

1. *Board members must avoid potential conflicts of interest or position themselves so that conflicts of interest do not arise. In the event that a conflict of interest cannot be avoided, Board members are required to disclose the potential conflict of interest in question and are prohibited from taking actions that could harm or reduce the Bank's profits.*
2. *If the Director responsible for compliance has a conflict of interest with the Bank, the compliance checklist shall be signed by another member of the Board of Directors.*
    a. *Members of the Board of Directors are prohibited from taking actions that could potentially harm the Bank or reduce the Bank's profits.*
    b. *In the event of a conflict of interest or potential conflict of interest involving an employee or an official who is a candidate for the Board of Directors in connection with their nomination at the Bank, the relevant candidate must disclose the conflict of interest during the Fit and Proper Test.*
3. *In the event of a conflict of interest or a potential conflict of interest involving an employee or an official who is a candidate for the Board of Directors in connection with their nomination at the Bank, the candidate in question must disclose the conflict of interest during the fitness and propriety assessment process*
4. *In the event that, based on the assessment of the Financial Services Authority, there is a conflict of interest or a potential conflict of interest involving an employee or an official who is a candidate for the Board of Directors of in connection with the relevant nomination at the Bank, the Financial Services Authority has the authority to impose the necessary supervisory measures*
5. *In the event that a member of the Board of Directors is unable to perform their duties or has a conflict of interest, the request shall be submitted by:*
    a. *another member of the Board of Directors who has no conflict of interest;*
    b. *a member of the Board of Commissioners if all members of the Board of Directors are unable to perform their duties or have a conflict of interest; or*
    c. *another party appointed by the General Meeting of Shareholders if all members of the Board of Directors or the Board of Commissioners are unable to perform their duties or have a conflict of interest.*

Etika Kerja

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

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

Code of Conduct

Policies regarding the Board of Directors' work ethics are outlined in the Bank Sahabat Sampoerna Board of Directors' Guidelines and Code of Conduct, as follows:

1. *Each member of the Board of Directors is required to perform their duties and responsibilities in good faith, with a sense of responsibility and due diligence, prioritizing the Bank's interests in a professional manner, and working and conducting themselves with the highest integrity.*
2. *Members of the Board of Directors must be committed to upholding the principle of legal compliance, adhere to the Bank's Code of Conduct and other internal policies, as well as applicable laws and regulations.*
3. *Members of the Board of Directors are prohibited from using the Bank and/or information obtained from the Bank for the personal benefit of themselves, their families, and/or other parties that may harm and/or diminish the profits and reputation of the Bank or its subsidiaries.*
4. *Members of the Board of Directors are prohibited from deriving and/or receiving personal benefits from the Bank other than the remuneration and other benefits established by the General Meeting of Shareholders and/or internal policies.*
5. *Members of the Board of Directors are required to disclose their remuneration and other benefits in accordance with the provisions regarding the implementation of corporate governance in the granting of remuneration for commercial banks.*
6. *Members of the Board of Directors are prohibited from holding concurrent positions as members of the Board of Directors, members of the Board of Commissioners, or executive officers at banks, companies, and/or other institutions.*
7. *Members of the Board of Directors are prohibited from holding concurrent positions in functional roles at banks and/or non-bank financial institutions, both domestically and abroad. Members of the Board of Directors may hold concurrent positions under the following criteria:*
   a. *Responsible for overseeing the Bank's investments in subsidiaries; performs functional duties as a member of the Board of Commissioners of non-bank subsidiaries under the Bank's control*
   b. *Responsible for overseeing the Bank's equity investments in subsidiaries, and performing functional duties as a member*
   c. *the Board of Commissioners of non-bank subsidiaries controlled by the Bank*
   d. *Responsible for the supervision of pension funds or performing duties as a member of the supervisory board of pension funds owned by the Bank*
   e. *Serving as an alternate director*
   f. *Holding a position in a nonprofit organization or institution, provided that such position does not cause the individual to neglect the performance of*

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 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.

their duties and responsibilities as a member of the Board of Directors

Points (i) and (ii) must be approved by the Board of Commissioners, and Point (iv) must be reported at a meeting of the Board of Commissioners. A candidate for the Board of Directors who holds concurrent positions as described in Points (c.i, c.ii, and c.iv) must make a statement to: maintain integrity, avoid any form of conflict of interest, and avoid actions that could harm the Bank and/or cause the Bank to violate the principle of prudence, while serving as a member of the Board of Directors

8. *Members of the Board of Directors are prohibited from holding concurrent positions in other roles that could result in a conflict of interest, as well as other positions, in accordance with applicable laws and regulations.*
9. *Members of the Board of Directors, either individually or collectively, are prohibited from holding shares in another company amounting to 25% (twenty-five percent) or more of the paid-in capital of said company.*
10. *In the event that the director overseeing the Compliance Function is temporarily unable to perform his or her duties for more than 7 (seven) consecutive business days, the relevant duties must be temporarily assumed by another director until the director overseeing the Compliance Function is able to resume his or her duties, and this must be reported to the OJK in accordance with applicable regulations.*
11. *In the event that the director in charge of the Compliance Function becomes permanently unable to perform his or her duties, resigns, or completes his or her term of office, the Bank must immediately appoint a replacement director in charge of the Compliance Function, no later than 6 (six) months after the director in charge of the Compliance Function becomes permanently unable to perform his or her duties, resigns, or completes his or her term of office.*
12. *During the process of replacing the director in charge of the Compliance Function, the Bank must appoint or assign one of the other directors to temporarily perform the duties of the director in charge of the Compliance Function.*
13. *The temporary replacement of the director in charge of 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 granting general authority to any other party that results in the delegation of the Board's duties and functions as stipulated in the OJK Regulation on Corporate Governance of Commercial Banks. The term "general authority" refers to the delegation of authority to one or more employees or other individuals that results in the comprehensive delegation of the Board's duties, powers, and responsibilities—that is, without any limitations on scope or duration.*

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; 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.

16. The following do not constitute dual roles for members of the Board of Directors: 1) being responsible for overseeing the Bank's investment in a subsidiary, while performing functional duties as a member of the Board of Commissioners of a non-bank subsidiary controlled by the Bank; 2) being responsible for overseeing a pension fund or serving on the supervisory board of a pension fund owned by the Bank; 3) performing duties as an alternate director; and/or 4) holding a position in a non-profit organization or institution, provided that this does not cause the individual to neglect the performance of their duties and responsibilities as a member of the Board of Directors.

17. Regarding the Implementation of Compliance Functions at Commercial Banks
   a. The duties and responsibilities of the director overseeing the Compliance Function must include, at a minimum:
      - *Formulate strategies to foster the creation of a Bank Compliance Culture;*
      - *Proposing compliance policies or principles to be established by the Board of Directors;*
      - *Establishing compliance systems and procedures used to develop the Bank's internal regulations and guidelines;*
      - *Ensuring that all policies, regulations, systems, and procedures, as well as business activities conducted by the Bank, comply with the provisions of the Financial Services Authority and applicable laws and regulations, including Sharia Principles for Sharia commercial banks and Sharia business units*
      - *Minimizing the Bank's Compliance Risks*
      - *Take preventive measures to ensure that policies and/or decisions made by the Bank's Board of Directors or the management of overseas branch offices do not deviate from the regulations of the Financial Services Authority and applicable laws and regulations*
   b. These duties and responsibilities do not negate the rights and obligations of the director overseeing the Compliance Function as a member of the Bank's Board of Directors, in cases where the Board of Directors must make a decision regarding specific actions by all members of the Bank's Board of Directors

18. Candidates for the Board of Directors who have undergone a fit and proper assessment and have received approval from the OJK shall be appointed by the General Meeting of Shareholders no later than 6 (six) months after obtaining OJK approval
   a. If the specified deadline is exceeded, the OJK's approval shall become invalid.

19. In the event that a member of the Board of Directors is dismissed, resigns, or passes away, Bank BHI is required to notify the OJK no later than 10 (ten) business days from the date of the dismissal letter, resignation, or declaration of death.

Waktu Kerja

Berdasarkan Pedoman dan Tata Tertib Kerja, waktu kerja Direksi ditetapkan sebagai berikut:

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

Working Hours

Pursuant to the Guidelines and Rules of Procedure, the working hours of the Board of Directors are set as follows:

1. *Working hours are the hours designated by the Bank for members of the Board of Directors to be present at the workplace to carry out their duties in managing the Bank.*
2. *Members of the Board of Directors may be away from the Bank's offices on official business. In the case of official travel, all members of the Board of Directors may not travel together on the same mode of transportation (particularly an airplane).*
3. *The workweek for members of the Board of Directors is five working days. If necessary, members of the Board of Directors may be present at the workplace outside of the Bank's regular working hours due to important and urgent matters.*

Pelaksanaan Rapat Internal Direksi

Berdasarkan Pedoman dan Tata Tertib Kerja, Direksi wajib menyelenggarakan rapat internal secara berkala paling sedikit 1 (satu) kali setiap bulan. Sepanjang tahun 2025, Direksi telah melaksanakan rapat internal sebanyak 41 kali yang diselenggarakan baik secara daring maupun tatap muka. Rapat internal tersebut turut dihadiri oleh jajaran manajemen Bank, seperti *Chief Operations Officer, Chief Credit Officer, Chief Human Capital Officer, Chief Digital Business, Chief Internal Auditor, Senior Management Team*. Informasi terkait frekuensi kehadiran serta agenda rapat internal Direksi dapat dilihat sebagai berikut:

Implementation of Internal Board of Directors Meeting

In accordance with the Work Guidelines and Rules of Procedure, the Board of Directors is required to hold internal meetings on a regular basis at least once a month. Throughout 2025, the Board of Directors held 41 internal meetings, conducted both online and in person. These internal meetings were also attended by the Bank's management, including the Chief Operations Officer, Chief Credit Officer, Chief Human Capital Officer, Chief Digital Business Officer, Chief Internal Auditor, and the Senior Management Team. Information regarding attendance frequency and the agenda of the Board of Directors' internal meetings is as follows:

Nama *Name*	**Jabatan** *Position*	**Total Rapat** *Total Meetings*	**Kehadiran** *Attendance*	**Persentase** *Percentage*
Ali Rukmijah	Direktur Utama *President Director*	41	37	90,2%
A. Dendi Hardiansyah	Direktur Kepatuhan & Manajemen Risiko *Compliance & Risk Director*	41	38	92,7%
Henky Suryaputra	Direktur Keuangan & Perencanaan Bisnis *Finance & Business Planning Director*	41	36	87,8%
Patrick Wong*	Direktur Bisnis *Business Director*	41	37	90,2%
Rudy Mahasin**	Direktur Bisnis UMKM *MSME Business Director*	41	40	90,2%
Hendra Rahardja	Direktur *Teknologi Informasi* *Information Technology* *Director*	41	40	97,6%
Rata-rata *Average*				91,5%

* Resmi menjabat per 25 November 2025 | *Officially serving as of November 25, 2025*
** Perubahan Nomenklatur Jabatan Menjadi Chief ESME per 25 November 2025 | *Job title changed to Chief ESME effective November 25, 2025*

No.	Tanggal *Date*	Agenda *Agenda*	Kehadiran *Attendance*					
			AR	ADH	HS	PW	RM	HR
1.	6 Januari 2025 *January 6, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update*	v	x	v	v	v	v
2.	13 Januari 2025 *January 13, 2025*	• BSS Financials Update Desember 2024 • *BSS financial update for December 2024*	v	v	v	v	v	v
3.	20 Januari 2025 *January 20, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • Realisasi RBB OJK Q4 2024 • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update* • *OJK RBB realization for Q4 2024*	v	v	v	x	v	v
4.	3 Februari 2025 *February 3, 2025*	• Diskusi Strategis BoM • *BoM strategic discussion*	v	v	v	v	v	v
5.	10 Februari 2025 *February 10, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • *Biweekly update on the Lending & Funding portfolio* • *- Funding program and business initiatives update*	v	v	v	v	v	v
6.	17 Februari 2025 *February 17, 2025*	• BSS Financials Jan-25 & PL by Business • BSS Laporan Tahunan & Laporan Keberlanjutan Project Update • *BSS financials Jan-25 and P&L by business* • *BSS annual and sustainability report project update*	v	x	x	v	v	v
7.	24 Februari 2025 *February 24, 2025*	• xUpdate Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • Group FUM dan Special Rate Management • Info Google Workspace Direktorat • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update* • *Group FUM and special rate management* • *Directorate Google Workspace update*	v	v	v	v	v	v
8.	3 Maret 2025 *March 3, 2025*	• Diskusi Strategis BoM • *BoM strategic discussion*	v	v	v	v	v	v
9.	10 Maret 2025 *March 10, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • SFG Financials Februari 2025 Update • BSS AI Roadmap February 2025 Update • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update* • *SFG financial update for February 2025* • *BSS AI roadmap update February 2025*	v	v	v	v	v	v
10.	17 Maret 2025 *March 17, 2025*	• KYC System Update • Diskusi Strategis BoM • *KYC system update* • *BoM strategic discussion*	v	v	v	v	v	v
11.	24 Maret 2025 *March 24, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update*	v	v	x	x	v	v
12.	14 April 2025 *April 14, 2025*	• Case BIFAST Artajasa - Preventive Action Plan by BSS • BSS Financials Maret 2025 Update • Diskusi Strategis BoM • *BIFAST Artajasa case – preventive action plan by BSS* • *BSS financial update for March 2025* • *BoM strategic discussion*	v	v	v	v	v	v
13.	21 April 2025 *April 21, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update*	v	v	x	v	v	v
14.	28 April 2025 *April 28, 2025*	• DASI Update • Sampoerna Mobile Banking UI/UX Revamp • *DASI update* • *Sampoerna Mobile Banking UI/UX revamp*	v	v	v	v	v	v

No.	Tanggal *Date*	Agenda *Agenda*	Kehadiran *Attendance*					
			AR	ADH	HS	PW	RM	HR
15.	5 Mei 2025 *May 5, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • Pengembangan Deal Calculator Rate & Fee Value Proposition (GenAI) • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update* • *Development of deal calculator rate & fee value proposition (GenAI)*	v	v	v	v	v	v
16.	19 Mei 2025 *May 19, 2025*	• BSS Financials April 2025 Update • Diskusi Strategis BoM • *BSS financial update for April 2025* • *BoM strategic discussion*	v	x	v	v	v	v
17.	26 Mei 2025 *May 26, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update*	v	v	v	v	v	v
18.	2 Juni 2025 *June 2, 2025*	• Diskusi Strategis BoM • Pembahasan ADVASA Project • *BoM strategic discussion* • *ADVASA project discussion*	v	v	v	v	v	v
19.	10 Juni 2025 *June 10, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • BSS Financials Mei 2025 Update • Piloting Open Banking with Ajaib Update • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update* • *BSS financial update for May 2025* • *Open Banking pilot with Ajaib update*	v	v	v	v	v	v
20.	23 Juni 2025 *June 23, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update*	v	v	v	x	v	v
21.	7 Juli 2025 *July 7, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • Sosialisasi Keamanan Email • Update Finalisasi Gedung Kantor Cibubur • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update* • *Email security awareness session* • *Update on the completion of the Cibubur office building*	x	v	v	v	v	v
22.	15 Juli 2025 *July 15, 2025*	• BSS Financials Juni 2025 Update • Diskusi Strategis BoM • *BSS financial update for June 2025* • *BoM strategic discussion*	x	v	v	v	v	v
23.	21 Juli 2025 *July 21, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • Asuransi Update • Tematik : Opex Trend Review • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update* • *Insurance update* • *Thematic: Opex trend review*	v	v	v	v	v	v
24.	4 Agustus 2025 *August 4, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • AYDA Web Information • Sosialisasi Kopkar Sampoerna Strategic • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update* • *AYDA web information* • *Sampoerna Strategic cooperative outreach*	v	v	v	v	v	v
25.	11 Agustus 2025 *August 11, 2025*	• Update Kewajiban Climate Risk Report ke OJK • Opex HO Non & Manpower Direktorat CFO & IT • *Update on climate risk reporting obligations to OJK* • *Head Office non-operational Opex & manpower – CFO & IT Directorate*	v	v	v	x	v	v

<table>
<tr><th rowspan="2">No.</th><th rowspan="2">Tanggal
Date</th><th rowspan="2">Agenda
Agenda</th><th colspan="6">Kehadiran
Attendance</th></tr>
<tr><th>AR</th><th>ADH</th><th>HS</th><th>PW</th><th>RM</th><th>HR</th></tr>
<tr><td>26.</td><td>26 Agustus 2025
August 26, 2025</td><td>• 2025 Business Unit KPI
• Opex HO Non & Manpower Direktorat Credit
• Opex HO Non & Manpower Direktorat SME & High End Business
• 2025 business unit KPIs
• Head Office non-operational Opex & manpower – Credit Directorate
• Head Office non-operational Opex & manpower – SME & High-End Business Directorate</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td></tr>
<tr><td>27.</td><td>1 September 2025
September 1, 2025</td><td>• Update Dwi Mingguan portfolio Lending & Funding
• Update Program Funding dan Inisiatif Bisnis
• Productivity & Activity Frontline team Cabang
• Biweekly update on the Lending & Funding portfolio
• Funding program and business initiatives update
• Productivity and activity of branch frontline teams</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td></tr>
<tr><td>28.</td><td>8 September 2025
September 8, 2025</td><td>• 2026 Budget Kick-Off
• Opex HO Non & Manpower Direktorat Human Capital, SKAI, Compliance & Risk
• 2026 budget kick-off
• Head Office non-operational Opex & manpower – Human Capital, Internal Audit Unit, Compliance & Risk Directorate</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td></tr>
<tr><td>29.</td><td>22 September 2025
September 22, 2025</td><td>• Update Dwi Mingguan portfolio Lending & Funding
• Update Program Funding dan Inisiatif Bisnis
• Biweekly update on the Lending & Funding portfolio
• Funding program and business initiatives update</td><td>v</td><td>v</td><td>v</td><td>v</td><td>x</td><td>v</td></tr>
<tr><td>30.</td><td>6 Oktober 2025
October 6, 2025</td><td>• Update Dwi Mingguan portfolio Lending & Funding
• Update Program Funding dan Inisiatif Bisnis
• Biweekly update on the Lending & Funding portfolio
• Funding program and business initiatives update</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td></tr>
<tr><td>31.</td><td>13 Oktober 2025
October 13, 2025</td><td>• BSS Financials September 2025 Update
• BSS financial update for September 2025</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td></tr>
<tr><td>32.</td><td>20 Oktober 2025
October 20, 2025</td><td>• Update Dwi Mingguan portfolio Lending & Funding
• Update Program Funding, asuransi, Inisiatif Bisnis
• Biweekly update on the Lending & Funding portfolio
• Program updates: funding, insurance, and business initiatives</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td></tr>
<tr><td>33.</td><td>27 Oktober 2025
October 27, 2025</td><td>• Review DR Drill Delivery Channel Application
• Diskusi Strategis BoM
• Review of DR drill delivery channel application
• BoM strategic discussion</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td></tr>
<tr><td>34.</td><td>3 November 2025
November 3, 2025</td><td>• Update Dwi Mingguan portfolio Lending & Funding
• DR Drill in General & Next DR Drill
• Biweekly update on the Lending & Funding portfolio
• DR drill overview and next DR drill plan</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td></tr>
<tr><td>35.</td><td>10 November 2025
November 10, 2025</td><td>• BSS Financials Oktober 2025 Update
• Diskusi Strategis
• BSS financial update for October 2025
• Strategic discussion</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td></tr>
<tr><td>36.</td><td>17 November 2025
November 17, 2025</td><td>• Update Dwi Mingguan portfolio Lending & Funding
• Update Program Funding dan Inisiatif Bisnis
• KYC Project Update
• OJK Audit Progress
• Biweekly update on the Lending & Funding portfolio
• Funding program and business initiatives update
• KYC project update
• OJK audit progress</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td></tr>
<tr><td>37.</td><td>24 November 2025
November 24, 2025</td><td>• Capacity Planning Strategy 2026–2028
• Diskusi Strategis
• Capacity planning strategy 2026–2028
• Strategic discussion</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td><td>v</td></tr>
</table>

No.	Tanggal *Date*	Agenda *Agenda*	Kehadiran *Attendance*					
			AR	ADH	HS	PW	RM	HR
38.	1 Desember 2025 *December 1, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • Sosialisasi POJK 24/'25 Pengelolaan Rekening & HASIL FIR on ML/TF 2025 BSS • Audit OJK Update • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update* • *Outreach on POJK 24/'25 account management & FIR results on ML/TF 2025 BSS* • *OJK audit update*	v	v	v	v	v	v
39.	15 Desember 2025 *December 15, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • Update Program Funding dan Inisiatif Bisnis • Financials November Update • Management Update • *Biweekly update on the Lending & Funding portfolio* • *Funding program and business initiatives update* • *November financial update* • *Management update*	v	v	v	v	v	v
40.	22 Desember 2025 *December 22, 2025*	• Persiapan Alert Saldo BI Fast Akhir Tahun 2025 • *Preparation for year-end BI Fast balance alert 2025*	x	v	x	v	v	x
41.	29 Desember 2025 *December 29, 2025*	• Update Dwi Mingguan portfolio Lending & Funding • *Biweekly update on the Lending & Funding portfolio*	x	v	x	v	v	v
TOTAL KEHADIRAN *TOTAL ATTENDANCE*			37	38	36	37	40	40

V: hadir | *present* x: tidak hadir | *absent*
Keterangan | *Remarks*:
AR: Ali Rukmijah
ADH: A. Dendi Hardiansyah
HS: Henky Suryaputra
PW: Patrick Wong*
RM: Rudy Mahasin**
HR: Hendra Rahardja
* Resmi menjabat per 25 November 2025 | *Officially serving as of November 25, 2025*
** Perubahan Nomenklatur Jabatan Menjadi Chief ESME per 25 November 2025 | *Job title changed to Chief ESME effective November 25, 2025*

Kepemilikan Saham

Per 31 Desember 2025, seluruh anggota Direksi Bank Sahabat Sampoerna tidak memiliki saham di dalam Bank ataupun di perusahaan lain di atas 5%, Sebagaimana tabel berikut:

Share Ownership

As of December 31, 2025, no member of the Board of Directors of Bank Sahabat Sampoerna owns more than a 5% stake in the Bank or in any other company, as shown in the following table:

Nama *Name*	**Bank Sahabat Sampoerna**	**Perusahaan lain >5%** *Other companies >5%*
Ali Rukmijah	Nihil *None*	Nihil *None*
A. Dendi Hardiansyah	Nihil *None*	Nihil *None*
Henky Suryaputra	Nihil *None*	Nihil *None*
Patrick Wong	Nihil *None*	Nihil *None*
Hendra Rahardja	Nihil *None*	Nihil *None*

Hubungan Afiliasi

Informasi terkait hubungan afiliasi antara Direksi dengan Direksi lainnya, Dewan Komisaris, dan Pemegang Saham Pengendali dapat dilihat sebagai berikut:

Affiliated Relationships

Information regarding affiliate relationships between the Board of Directors and other Boards of Directors, the Board of Commissioners, and Controlling Shareholders is as follows:

Nama *Name*	**Dewan Komisaris** *Board of Commissioners*	**Direksi** *Board of Directors*	**Pemegang Saham Pengendali** *Controlling Shareholders*	**Keterangan** *Remarks*
Ali Rukmijah	x	x	v	-
A. Dendi Hardiansyah	x	x	x	-
Henky Suryaputra	x	x	x	-
Patrick Wong	x	x	x	-
Hendra Rahardja	x	x	x	-

Keterangan | *Remarks*:
v: Ada | *Yes*
x: Tidak ada | *None*

Rangkap Jabatan

Pedoman dan Tata Tertib Kerja Direksi turut memuat mengenai kebijakan rangkap jabatan bagi seluruh anggota Direksi. Bank memastikan bahwa seluruh anggota Direksi telah memenuhi seluruh ketentuan yang telah ditetapkan, baik dalam kebijakan internal maupun peraturan yang berlaku. Adapun pengungkapan rangkap jabatan masing-masing anggota Direksi hingga akhir tahun 2025 adalah sebagai berikut:

Concurrent Positions

The Board of Directors' Guidelines and Code of Conduct also address the policy on concurrent positions for all members of the Board of Directors. The Bank ensures that all members of the Board of Directors have complied with all applicable requirements, both in internal policies and applicable regulations. The disclosure of concurrent positions held by each member of the Board of Directors through the end of 2025 is as follows:

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

Kebijakan Keberagaman Komposisi Direksi

Pada tahun 2025, Bank belum menyusun dan menetapkan kebijakan yang mengatur keberagaman komposisi Direksi. Meski demikian, komposisi Direksi telah disusun sedemikian rupa dengan memperhatikan kombinasi karakteristik dan kemampuan sesuai dengan kebutuhan Bank serta memastikan kesesuaiannya dengan peraturan perundang-undangan yang berlaku. Hal tersebut bertujuan untuk memungkinkan pengambilan keputusan dapat dilakukan secara efektif, tepat, dan cepat dengan tetap mematuhi ketentuan perundang-undangan yang berlaku dengan memperhatikan aspek keberagaman.

Diversity Policy for the Composition of the Board of Director

As of 2025, the Bank has not yet formulated and established a policy governing the diversity of the Board of Directors' composition. Nevertheless, the composition of the Board of Directors has been structured in such a way as to take into account a combination of characteristics and capabilities in line with the Bank's needs, while ensuring compliance with applicable laws and regulations. This aims to enable decision-making to be had effectively, appropriately, and promptly while adhering to applicable laws and regulations and taking into account diversity aspects.

Aspek Keberagaman *Diversity Aspects*	**Penjelasan** *Explanation*	
Pendidikan *Education*	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. *The Board of Directors has a diverse educational background, ranging from bachelor's to master's degrees, with expertise in Mechanical Engineering, Industrial Engineering, Accounting and Finance, Business Administration, Computer Science, and Economics and Business Law.*	Komposisi Direksi telah memenuhi unsur keberagaman, yaitu perpaduan dari sisi pendidikan, pengalaman kerja, dan usia. *The composition of the Board of Directors meets the criteria for diversity, namely a combination of educational background, work experience, and age.*
Pengalaman Kerja *Work Experience*	Keberagaman pengalaman kerja Direksi antara lain berasal dari profesional pada perbankan maupun lembaga keuangan non bank. *The diversity of the Board of Directors' work experience includes professionals from both the banking sector and non-bank financial institutions.*	
Usia *Age*	Usia Direksi Bank antara 46-52 tahun. *The ages of the Bank's Board members range from 46 to 52 years.*	

Program Pengenalan bagi Anggota Direksi Baru

Direksi yang baru menjabat akan mendapatkan program orientasi yang bertujuan untuk memberikan pemahaman mengenai latar belakang serta kegiatan usaha Bank Sahabat Sampoerna, sehingga mendukung kelancaran dan efektivitas pelaksanaan tugas dan fungsi Direksi. Untuk meningkatkan pemahaman Direksi, Perusahaan juga menyampaikan dokumen-dokumen penunjang lainnya antara lain Laporan Tahunan, Rencana Kerja dan Anggaran Perusahaan, Anggaran Dasar, dan sebagainya.

Orientation Program for New Board of Directors' Members

Newly appointed members of the Board of Directors will undergo an orientation program designed to provide an understanding of the background and business activities of Bank Sahabat Sampoerna, thereby supporting the smooth and effective performance of the Board's duties and functions. To enhance the Board's understanding, the Company also provides other supporting documents, including the Annual Report, the Company's Work Plan and Budget, the Articles of Association, and so on.

Di tahun 2025, terdapat perubahan komposisi Direksi Bank Sahabat Sampoerna sesuai dengan keputusan RUPS Tahunan yang ditetapkan dalam Akta No.66 tanggal 17 Desember 2025, Bank telah melaksanakan program pengenalan bagi Patrick Wong yang baru menjabat sebagai Direktur Bisnis di Bank Sahabat Sampoerna.

In 2025, there was a change in the composition of Bank Sahabat Sampoerna's Board of Directors in accordance with the decision of the Annual General Meeting of Shareholders as stipulated in Deed No. 66 dated December 17, 2025. The Bank has conducted an orientation program for Patrick Wong, who has recently assumed the position of Business Director at Bank Sahabat Sampoerna.

Pengembangan Kompetensi Direksi Tahun 2025

Board of Director's Competency Development in 2025

Untuk menunjang Direksi dalam melaksanakan tugas dan tanggung jawabnya, Bank memberikan kesempatan kepada anggota Direksi untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh pihak internal maupun eksternal. Sepanjang tahun 2025, anggota Direksi telah mengikuti program pelatihan dan pengembangan kompetensi sebagai berikut:

To support the Board of Directors in performing their duties and responsibilities, the Bank provides opportunities for Board members to participate in training and competency development programs, both organized internally and externally. Throughout 2025, Board members have participated in the following training and competency development programs:

Nama *Name*	Jabatan *Position*	Topik Pelatihan *Training Topic*	Penyelenggara *Organizer*	Tanggal Pelatihan *Training Date*
Ali Rukmijah	Direktur Utama *President Director*	• Sertifikasi Manajemen Risiko • "ACTION-POWERED FROM WITHIN: Leveraging Inner Strength for a High Energy result • *Risk Management Certification* • *"ACTION-POWERED FROM WITHIN: Leveraging Inner Strength for High-Energy Results* • *Webinar: The 2025 ASEAN-KOREA Financial Cooperation Forum with the theme "The Future of Digital Innovation in Finance*	• Garda • Bank Sahabat Sampoerna	• Juli 2025 • October 2025 • *July 2025* • *October 2025*
Henky Suryaputra	Direktur Keuangan & Perencanaan Bisnis *Finance & Business Planning Director*	• Sertifikasi Manajemen Risiko • "ACTION-POWERED FROM WITHIN: Leveraging Inner Strength for a High Energy result • Sertifikasi SPPUR J6 – Pemrosesan Transaksi Pembayaran • *Risk Management Certification* • *"ACTION-POWERED FROM WITHIN: Leveraging Inner Strength for High-Energy Results* • *Webinar: The 2025 ASEAN-KOREA Financial Cooperation Forum with the theme "The Future of Digital Innovation in Finance*	• Garda • Bank Sahabat Sampoerna • LPPI	• Juli 2025 • October 2025 • Agustus 2025 • *July 2025* • *October 2025* • *August 2025*
Hendra Rahardja	Direktur Teknologi Informasi *Information Technology Director*	• Sertifikasi Manajemen Risiko • "ACTION-POWERED FROM WITHIN: Leveraging Inner Strength for a High Energy result • Webinar The 2025 ASEAN-KOREA Financial Cooperation Forum dengan tema "The Future of Digital Innovation in Finance • *Risk Management Certification* • *"ACTION-POWERED FROM WITHIN: Leveraging Inner Strength for High-Energy Results* • *Webinar: The 2025 ASEAN-KOREA Financial Cooperation Forum with the theme "The Future of Digital Innovation in Finance*	• Garda • Bank Sahabat Sampoerna • OJK	• Juli 2025 • October • October 2025 • 2 Dec 2025 • *July 2025* • *October* • *October 2025* • *December 2, 2025*
Patrick Wong	Direktur Bisnis UMKM *MSME Business Director*	• Sertifikasi Manajemen Risiko • "ACTION-POWERED FROM WITHIN: Leveraging Inner Strength for a High Energy result • *Risk Management Certification* • *"ACTION-POWERED FROM WITHIN: Leveraging Inner Strength for High-Energy Results*	• Garda • Bank Sahabat Sampoerna	• Juli 2025 • October 2025 • *July 2025* • *October 2025*
A. Dendi Hardiansyah	Direktur Kepatuhan & Manajemen Risiko *Compliance & Risk Director*	• Sertifikasi Manajemen Risiko • "ACTION-POWERED FROM WITHIN: Leveraging Inner Strength for a High Energy result • *Risk Management Certification* • *"ACTION-POWERED FROM WITHIN: Leveraging Inner Strength for High-Energy Results*	• Garda • Bank Sahabat Sampoerna	• Juli 2025 • October 2025 • *July 2025* • *October 2025*

Pelaksanaan Tugas Direksi Tahun 2025

Sepanjang tahun 2025, 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:

1. 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).
2. 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.
3. Menerapkan Tata Kelola yang Baik pada Bank, Direksi paling sedikit wajib membentuk Satuan Kerja Audit Internal, Satuan Kerja Manajemen Risiko, dan Satuan Kerja Kepatuhan.
4. 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.
5. 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.

Penilaian Kinerja Direksi

Penilaian dan pengukuran kinerja anggota Direksi didasarkan pada hasil pelaksanaan tugas dan tanggung jawab yang dijalankan oleh masing-masing anggota Direksi sesuai dengan target kinerja Bank maupun target kinerja individu. Penilaian tersebut dilakukan antara lain melalui evaluasi atas kewajaran Laporan Keuangan, pencapaian rasio-rasio keuangan dan pangsa pasar, serta realisasi komponen-komponen lain yang tercantum dalam *Key Performance Indicator* (KPI) Direksi.

Laporan pertanggungjawaban Direksi atas pelaksanaan tugas disusun untuk selanjutnya dimuat dalam Laporan Tahunan, memperoleh persetujuan RUPS Tahunan, serta dipublikasikan melalui situs web Bank dan disampaikan kepada pihak-pihak terkait sesuai dengan ketentuan peraturan perundang-undangan yang berlaku. Selain itu, Bank melaksanakan *self-assessment* atas penerapan GCG dengan salah satu aspek penilaian mencakup Pelaksanaan Tugas dan Tanggung Jawab Direksi.

Performance of the Board of Directors in 2025

Throughout 2025, the Board of Directors has done its duties and responsibilities in managing the Bank in accordance with applicable work guidelines and laws and regulations, and has fulfilled the recommendations of the General Meeting of Shareholders through a number of activities, such as:

1. *Executing management functions for the Bank's benefit in accordance with the intent and as set forth in the Board of Directors' guidelines, the Bank's articles of association, applicable laws and regulations, and the aspirations of shareholders (Resolutions of the General Meeting of Shareholders).*
2. *Implementing sound governance in banks, risk management, and compliance in an integrated manner that is aligned with the latest developments in the banking ecosystem and supported by digitalization and technological innovation.*
3. *Implementing Good Corporate Governance in the Bank, the Board of Directors is required to establish, at a minimum, an Internal Audit Unit, a Risk Management Unit, and a Compliance Unit.*
4. *Follow up on audit findings or inspections 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 and institutions.*
5. *Provide accurate, relevant, and timely data and information, including to the Board of Commissioners, and manage data and information in accordance with the Bank's good governance principles and applicable laws and regulations.*

Board of Directors Performance Evaluation

The assessment and measurement of Board members' performance are based on the results of the duties and responsibilities conducted by each Board member in accordance with the Bank's performance targets and individual performance targets. Such assessments are conducted, among other things, through evaluations of the fairness of the Financial Statements, the achievement of financial ratios and market share, as well as the realization of other components listed in the Board of Directors' Key Performance Indicators (KPIs).

The Board of Directors' accountability report on the performance of its duties is prepared for inclusion in the Annual Report, approved by the Annual General Meeting of Shareholders, published on the Bank's website, and submitted to relevant parties in accordance with applicable laws and regulations. In addition, the Bank conducts a self-assessment of the implementation of GCG, with one of the assessment aspects covering the Performance of the Board of Directors' Duties and Responsibilities.

Berdasarkan penilaian yang dilakukan di tahun 2025, hasil untuk aspek Pelaksanaan Tugas dan Tanggung Jawab Direksi memperoleh nilai komposit 1 atau "*Low*". Informasi lengkap terkait hasil penilaian tersebut dapat dilihat pada bagian Hasil *Self-Assessment* Tata Kelola Perusahaan (GCG) dalam Laporan Tahunan ini.

Based on the assessment conducted in 2025, the results for the aspect of the Board of Directors' Performance of Duties and Responsibilities received a composite score of 1, or "Low." Complete information regarding these assessment results is available in the Corporate Governance (GCG) Self-Assessment Results section of this Annual Report.

Penilaian Kinerja Organ Pendukung Direksi

Performance Assessment of the Board's Supporting Bodies

Bank Sahabat Sampoerna turut melakukan penilaian kinerja terhadap organ pendukung Direksi yang dilakukan sebagai proses evaluasi untuk mengetahui pelaksanaan tugas dan 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 2025.
2. Rekomendasi yang diberikan.
3. Tingkat kehadiran dalam masing-masing rapat komite.

Bank Sahabat Sampoerna also conducts performance assessments of the Board's supporting bodies as part of an evaluation process to determine the execution of duties and achievement of targets by each supporting governing body. This assessment process is conducted periodically, taking into account the following criteria:

1. *Performance of duties and responsibilities during 2025.*
2. *Recommendations provided.*
3. *Attendance rates at each committee meeting.*

Sepanjang tahun 2025, Direksi menilai bahwa 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.

Throughout 2025, the Board of Directors assessed that all supporting bodies had performed their duties and responsibilities well and had complied with applicable work guidelines and laws and regulations. The Board of Directors also consistently provided advice and recommendations to the supporting bodies to optimize the performance of their duties and adapt to current business developments.

Mekanisme Pengunduran Diri dan Pemberhentian Direksi

Mechanism for Resignation and Dismissal of the Board of Directors

Mekanisme Pengunduran Diri

Resignation Mechanism

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
3. 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.
4. Bank wajib melaporkan pengunduran diri anggota Direksi kepada regulator terkait dan menyelenggarakan RUPS sesuai dengan ketentuan perundang-undangan yang berlaku.
5. Anggota Direksi yang terlibat dalam kejahatan keuangan dan/atau tindak pidana lainnya wajib mengundurkan diri dari Direksi.

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

1. *A member of the Board of Directors may resign from his or her position by submitting a written request to the Bank, stating the reasons for the resignation.*
2. *The resignation request must be submitted to the Bank no later than 30 days prior to the effective date*
3. *resignation, accompanied by the reason for the resignation; however, the individual in question must still be held accountable at the General Meeting of Shareholders regarding the performance of their duties for the term of office from the end of their accountability period until the effective date of their resignation.*
4. *The bank is required to report the resignation of a member of the Board of Directors to the relevant regulator and convene a General Meeting of Shareholders in accordance with applicable laws and regulations.*
5. *Board members involved in financial crimes and/or other criminal offenses must resign from the Board.*

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.

Dismissal Mechanism

Bank Sahabat Sampoerna has established the following dismissal mechanism for members of the Board of Directors:

1. *A Board member may be temporarily suspended by the Board of Commissioners, stating the reasons for the suspension.*
2. *The temporary dismissal of a member of the Board of Directors must be communicated in writing.*
3. *The Board of Commissioners must convene a General Meeting of Shareholders to revoke or uphold the decision on temporary suspension.*
4. *The GMS must be held no later than 90 days after the date of the temporary dismissal.*
5. *If the GMS is unable to make a decision within the specified timeframe, the temporary suspension shall be deemed void.*
6. *A member of the Board of Directors who has been temporarily suspended is not authorized to:*
    a. *Manage the Bank; and*
    b. *Represent the Bank in or out of court.*
7. *The limitations on the authority of Board members shall apply from the issuance of the temporary suspension decision by the Board of Commissioners until:*
    a. *The issuance of a GMS resolution confirming or revoking the temporary suspension; and*
    b. *Exceeding the time limit for holding the General Meeting of Shareholders.*

Prosedur Penetapan Remunerasi Dewan Komisaris dan Direksi

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

Bank Sahabat Sampoerna mengelompokkan bentuk apresiasi finansial bagi Dewan Komisaris dan Direksi menjadi 2 (dua) komponen 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).

Bank Sahabat Sampoerna categorizes financial compensation for the Board of Commissioners and the Board of Directors into 2 (two) remuneration components, namely:

1. *Fixed Remuneration*
   Remuneration provided for the performance of duties and responsibilities of the Board of Commissioners and the Board of Directors during the fiscal year.
2. *Variable Remuneration*
   Remuneration awarded for the Bank's performance achievements, as well as the contributions and achievements of each member of the Board of Commissioners and the Board of Directors, is determined based on key performance indicators (KPIs).

Struktur dan Besaran Remunerasi Dewan Komisaris dan Direksi

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

Dalam menetapkan struktur dan besaran remunerasi bagi anggota Dewan Komisaris dan Direksi, Bank menyesuaikan kebijakan tersebut dengan Peraturan OJK No. 45/POJK.03/2015 dan Surat Edaran OJK No. 40/SEOJK.03/2016 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum. Berdasarkan ketentuan tersebut, Dewan Komisaris berhak memperoleh struktur remunerasi yang meliputi honorarium, Tunjangan Hari Raya (THR), serta fasilitas asuransi kesehatan dan Badan Penyelenggaraan Jaminan Sosial (BPJS) Ketenagakerjaan dan Kesehatan. Sementara, Direksi memperoleh struktur remunerasi yang terdiri atas gaji pokok, THR, subsidi tunai, serta fasilitas kesehatan dan BPJS Ketenagakerjaan dan Kesehatan.

In determining the structure and amount of remuneration for members of the Board of Commissioners and the Board of Directors, the Bank aligns its policy with OJK Regulation No. 45/POJK.03/2015 and OJK Circular Letter No. 40/SEOJK.03/2016 regarding the Implementation of Corporate Governance in the Granting of Remuneration for Commercial Banks. Based on these provisions, the Board of Commissioners is entitled to a compensation package that includes honoraria, Holiday Allowance (THR), as well as health insurance coverage as well as coverage under the Social Security Administration Agency (BPJS) for Employment and Health. Meanwhile, the Board of Directors receives a compensation package consisting of a base salary, THR, cash subsidies, and health insurance coverage as well as coverage under BPJS for Employment and Health.

Struktur dan besaran remunerasi masing-masing anggota Dewan Komisaris dan Direksi diuraikan sebagai berikut:

The structure and amount of remuneration for each member of the Board of Commissioners and the Board of Directors are outlined as follows:

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

Jenis Remunerasi dan Fasilitas Lain *Types of Compensation and Other Benefits*	Jumlah Diterima dalam 1 Tahun *Amount Received in 1 Year*	
	Dewan Komisaris *Board of Commissioners*	
	Orang *Number of People*	Nominal (Rp juta) *Amount (IDR million)*
Remunerasi (gaji, bonus, tunjangan rutin, tantiem, dan fasilitas lainnya dalam bentuk non-natura) *Remuneration (salary, bonuses, regular allowances, profit sharing, and other non-in-kind benefits)*	4	3.492
Fasilitas lain dalam bentuk natura (perumahan, fasilitas kesehatan, dan sebagainya) yang: *Other benefits in kind (housing, health benefits, etc.) that:*	4	0.258
Dapat dimiliki* *Can be owned**	4	0.258
Tidak dapat dimiliki *Cannot be owned*	Nihil *None*	Nihil *None*
Jumlah *Total*	4	3.749

*) Nilai Premi Asuransi | *Value of Insurance Premiums*

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

Jumlah Remunerasi Tunai per Orang dalam 1 Tahun *Total Cash Remuneration per Person per Year*	Jumlah Dewan Komisaris *Total Board of Commissioners*
Di atas Rp2 miliar *Over Rp2 billion*	0
Di atas Rp1 miliar - Rp2 miliar *Over Rp1 billion - Rp2 billion*	2
Di atas Rp500 juta - Rp1 miliar *Over Rp1 billion - Rp2 billion*	1
Rp500 juta ke bawah *Under Rp500 million*	1

*) Jumlah yang diterima secara tunai | *Amount received in cash*

Jumlah Remunerasi yang Bersifat Variabel yang Diterima Dewan Komisaris
Amount of Variable Remuneration Received by the Board of Commissioners

Keterangan *Description*	**Jumlah Diterima dalam 1 Tahun** *Total Received in 1 Year*	
	Dewan Komisaris *Board of Commissioners*	
	Orang *Number of People*	**Nominal (Rp juta)** *Amount (Rp million)*
Remunerasi yang Bersifat Variabel yang Diterima *Variable Remuneration Received*	4	65

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

Jenis Remunerasi dan Fasilitas Lain *Type of Remuneration and Other Benefits*	**Jumlah Diterima dalam 1 Tahun** *Amount Received in 1 Year*	
	Direksi *Board of Directors*	
	Orang *Number of People*	**Nominal (Rp juta)** *Amount (Rp million)*
Remunerasi (gaji, bonus, tunjangan rutin, tantiem, dan fasilitas lainnya dalam bentuk non-natura) *Remuneration (salary, bonuses, regular allowances, profit sharing, and other non-in-kind benefits)*	5	28.441
Fasilitas lain dalam bentuk natura (perumahan, fasilitas kesehatan, dan sebagainya) yang: *Other benefits in kind (housing, health benefits, etc.) that:*	5	1.138
Dapat dimiliki* *Can be owned**	5	1.138
Tidak dapat dimiliki *Cannot be owned*	Nihil	Nihil
Jumlah *Total*	5	29.579

*) Nilai Premi Asuransi | *Value of Insurance Premiums*

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

Jumlah Remunerasi Tunai per Orang dalam 1 Tahun* *Total Cash Remuneration per Person per Year**	**Jumlah Direksi** *Number of Directors*
Di atas Rp2 miliar *Over Rp2 billion*	5
Di atas Rp1 miliar - Rp2 miliar *Over Rp1 billion - Rp2 billion*	0
Di atas Rp500 juta - Rp1 miliar *Over Rp1 billion - Rp2 billion*	0
Rp500 juta ke bawah *Under Rp500 million*	0

*) dalam Gross | *gross*

Jumlah Remunerasi yang Bersifat Variabel yang Diterima
Total Variable Remuneration Received

Keterangan *Description*	**Jumlah Diterima dalam 1 Tahun** *Amount Received in 1 Year*			
	Direksi *Board of Directors*		**Pegawai** *Employees*	
	Orang *Number of People*	**Nominal (Rp juta)** *Amount (Rp million)*	**Orang** *Number of People*	**Nominal (Rp juta)** *Amount (Rp million)*
Remunerasi yang Bersifat Variabel yang Diterima *Variable Remuneration Received*	5	5,385	399	6,225

Rasio Gaji

Berdasarkan remunerasi yang diterima oleh Dewan Komisaris dan Direksi, rasio gaji karyawan dan Dewan Komisaris dan/atau Direksi pada tahun 2025 dapat dilihat sebagai berikut:

Salary Ratio

Based on the remuneration received by the Board of Commissioners and the Board of Directors, the salary ratio between employees and the Board of Commissioners and/or the Board of Directors in 2025 is as follows:

Rasio Gaji Tertinggi dan Terendah *Highest and Lowest Salary Ratios*	**Rasio 2025** *2025 Ratio*
Rasio gaji karyawan tertinggi dan terendah *Highest and Lowest Employee Salary Ratios*	1: 62.7
Rasio gaji Direksi tertinggi dan terendah *Highest and lowest salary ratio for the Board of Directors*	1: 3.2
Rasio gaji Dewan Komisaris tertinggi dan terendah *Highest and lowest salary ratio for the Board of Commissioners*	1: 2.3
Rasio gaji Direksi tertinggi dan karyawan terendah *Ratio of highest to lowest executive compensation*	1: 141.2

Jumlah Nominal Pesangon yang Dibayarkan per Orang dalam 1 Tahun
Nominal Severance Pay Amount Paid Per Person Per Year

Jumlah Nominal Pesangon yang Dibayarkan per Orang dalam 1 Tahun *Total Severance Pay Paid Per Person in One Year*	**Total Pegawai** *Total Employees*
Di atas Rp1 miliar *Over Rp1 billion*	4
Di atas Rp500 juta - Rp1 miliar *Over Rp500 million - Rp1 billion*	4
Di bawah Rp500 juta *Under Rp500 million*	136

Remunerasi yang Bersifat Variabel

Hingga akhir tahun 2025, Bank belum memiliki kebijakan pemberian saham/opsi pembelian saham kepada Dewan Komisaris, Direksi, dan Pejabat Eksekutif. Meski demikian, Bank Sahabat Sampoerna memberikan remunerasi yang bersifat variabel kepada *Material Risk Taker* (MRT) dengan rincian sebagai berikut:

Variable Remuneration

As of the end of 2025, the Bank has not yet established a policy regarding the granting of shares or stock options to the Board of Commissioners, the Board of Directors, and Executive Officers. However, Bank Sahabat Sampoerna provides variable remuneration to Material Risk Takers (MRT) as detailed below:

No.	Keterangan *Description*	Nominal (Rp juta) *Amount (Rp million)*
1.	Remunerasi yang Bersifat Tetap* *Fixed Remuneration**	
a.	Tunai *Cash*	32,966
b.	Saham/instrumen berbasis saham yang diterbitkan Bank *Shares/equity-based instruments issued by the Bank*	Nihil *None*
2.	Remunerasi yang Bersifat Variabel* *Variable Remuneration**	
a.	Tunai *Cash*	7,364
b.	Saham/instrumen berbasis saham yang diterbitkan Bank *Shares/equity-based instruments issued by the Bank*	Nihil *None*

*) Hanya untuk MRT | *For MRT only*

Informasi Kuantitatif
Quantitative Information

Jenis Remunerasi yang Bersifat Variabel *Types of Variable Remuneration*	Total Pengurangan Selama Periode Laporan *Total Reduction During the Reporting Period*			
	Sisa yang Masih Ditangguhkan *Remaining Deferred Amount*	Disebabkan Penyesuaian Eksplisit *Due to Explicit Adjustments*	Disebabkan Penyesuaian Implisit *Due to Implicit Adjustments*	Total *(A) + (B)*
Tunai (dalam jutaan Rupiah) *Cash (in millions of Rupiah)*	7,363	Nihil *None*	Nihil *None*	7,363
Saham/instrumen berbasis saham yang diterbitkan Bank (dalam lembar saham dan nominasi juta Rupiah yang merupakan konversi dari lembar saham tersebut) *Shares/equity-based instruments issued by the Bank (in number of shares and nominal value in millions of Rupiah converted from those shares)*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*

Komite dan Organ Pendukung Dewan Komisaris

Committees and Supporting Bodies of the Board of Commissioners

Bank Sahabat Sampoerna telah membentuk organ pendukung Dewan Komisaris untuk melaksanakan fungsi pengawasan terhadap pengelolaan perusahaan. Organ pendukung Dewan Komisaris Bank Sahabat Sampoerna terdiri dari Komite Audit, Komite Remunerasi dan Nominasi, serta Komite Pemantau Risiko. Uraian mengenai masing-masing organ pendukung Dewan Komisaris disajikan sebagai berikut.

Bank Sahabat Sampoerna has established supporting bodies under the Board of Commissioners to perform oversight functions regarding the management of the company. The supporting bodies under the Board of Commissioners of Bank Sahabat Sampoerna consist of the Audit Committee, the Remuneration and Nomination Committee, and the Risk Monitoring Committee. A description of each of these supporting bodies is provided below.

Komite Audit

Komite Audit merupakan organ pendukung Dewan Komisaris yang dibentuk untuk mendukung pelaksanaan tugas Dewan Komisaris dalam melakukan pemantauan, pemeriksaan, dan penelaahan atas Laporan Keuangan Bank, baik laporan bulanan, triwulanan, maupun tahunan. Komite Audit juga bertanggung jawab untuk memberikan rekomendasi terkait penunjukan akuntan eksternal, melakukan penelaahan atas tingkat kepatuhan Bank terhadap ketentuan peraturan perundang-undangan yang berlaku, serta mengawasi penerapan GCG secara menyeluruh.

Audit Committee

The Audit Committee is a supporting body of the Board of Commissioners established to assist the Board of Commissioners in monitoring, examining, and reviewing the Bank's financial statements, including monthly, quarterly, and annual reports. The Audit Committee is also responsible for providing recommendations regarding the appointment of external auditors, reviewing the Bank's level of compliance with applicable laws and regulations, and overseeing the comprehensive implementation of GCG.

Piagam Komite

Bank Sahabat Sampoerna telah memiliki Piagam Komite Audit yang telah diperbarui dan disetujui oleh Dewan Komisaris dan efektif berlaku pada 1 Desember 2023. Piagam ini berfungsi sebagai pedoman dasar bagi Komite Audit untuk melaksanakan tugas dan tanggung jawabnya. Piagam ini juga disusun dengan mengacu kepada peraturan perundang-undangan yang berlaku dan Anggaran Dasar Bank. Adapun pokok-pokok pada Piagam Komite Audit, antara lain:

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.

Committee Charter

Bank Sahabat Sampoerna has adopted an updated Audit Committee Charter, which has been approved by the Board of Commissioners and is effective as of December 1, 2023. This Charter serves as a fundamental guideline for the Audit Committee in performing its duties and responsibilities. It was drafted in accordance with the Indonesian Financial Services Authority regulations, applicable laws and regulations, and the Bank's Articles of Association. The key points of the Audit Committee Charter include:

1. *General Objectives;*
2. *General Functions and Roles;*
3. *Duties and Responsibilities;*
4. *Authority;*
5. *Working Procedures and Processes;*
6. *Structure and Membership;*
7. *Membership Requirements;*
8. *Term of Office;*
9. *Operating Mechanisms;*
10. *Working Hours;*
11. *Committee Meetings;*
12. *Meeting Decision-Making Mechanism;*
13. *Meeting Minutes;*
14. *Reporting;*
15. *Handling of Complaints/Reports of Alleged Financial Reporting Violations; and*
16. *Conclusion.*

Kiri ke Kanan | *Left to Right:*

- **Juwono Akuan Rokanta**
  Anggota Komite Audit
  Member of the Audit Committee
- **Muhammad Rizaldy**
  Anggota Komite Audit
  Member of the Audit Committee
- **Anggar Budhi Nuraini**
  Ketua Komite Audit
  Chairman of the Audit Committee

Komposisi dan Profil Komite

Per 31 Desember 2025, Komite Audit Bank berjumlah 3 (tiga) orang, yang terdiri atas 1 (satu) orang Ketua yang berasal dari Komisaris Independen Bank serta 2 (dua) orang pihak independen yang memiliki pengalaman di bidang keuangan atau akuntansi, hukum, dan perbankan. Sebagai organ pendukung Dewan Komisaris, Komite Audit bertanggung jawab untuk berkoordinasi serta menyampaikan Laporan Pelaksanaan Tugas secara langsung kepada Dewan Komisaris Bank. Adapun susunan keanggotaan Komite Audit Bank Sahabat Sampoerna pada tahun 2025 diungkapkan sebagai berikut:

Composition and Profile of the Committee

As of December 31, 2025, the Bank's Audit Committee consists of 3 (three) members, comprising 1 (one) Chairperson selected from the Bank's Independent Commissioners and 2 (two) independent members with experience in finance or accounting, law, and banking. As a supporting body of the Board of Commissioners, the Audit Committee is responsible for coordinating and submitting its Activity Report directly to the Bank's Board of Commissioners. The composition of the Audit Committee of Bank Sahabat Sampoerna in 2025 is as follows:

Nama *Name*	**Jabatan** *Position*	**Dasar Pengangkatan** *Basis of Appointment*	**Periode Jabatan** *Term of Office*
Anggar Budhi Nuraini	Ketua *Chairman*	Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 tanggal 19 Mei 2023 *Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 dated May 19, 2023*	19 Mei 2026 *May 19, 2026*
Juwono Akuan Rokanta	Anggota *Member*	• 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 • *Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 dated May 19, 2023* • *Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep- 002/BSS/DIR/VIII/2021 dated August 18, 2021*	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. *Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 dated May 19, 2023.*	19 Mei 2026 *May 19, 2026*

Anggar Budhi Nuraini

Ketua Komite Audit
Chairman 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 Chairman of the Audit Committee is available in the Board of Commissioners section of the Company Profile chapter in this Annual Report.

Juwono Akuan Rokanta

Anggota Komite Audit
Member of the Audit Committee

Kewarganegaraan *Nationality*	Usia *Age*	Domisili *Domicile*
Indonesia *Indonesian*	64 Tahun *64 years old*	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 May 19, 2023* • *2021–2023: Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/VIII/2021 dated August 18, 2021*
Riwayat Pendidikan *Educational Background*	• Magister Manajemen, Sekolah Tinggi Manajemen Bandung, Bandung (1995) • Sarjana Ekonomi jurusan Manajemen, Universitas Katolik Atmajaya, Jakarta (1986)	• *Master of Management, Bandung School of Management, Bandung (1995)* • *Bachelor of Economics, majoring in Management, Atmajaya Catholic University, Jakarta (1986)*
Keahlian *Expertise*	Ekonomi, Manajemen, dan Perbankan	*Economics, Management, and Banking*
Sertifikasi Profesi *Professional Certification*	Sertifikasi Manajemen Risiko Jenjang 7	*Level 7 Risk Management Certification*
Riwayat Pekerjaan *Work History*	Menduduki beberapa posisi di PT Bank Danamon Indonesia Tbk: • *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	*Held several positions at PT Bank Danamon Indonesia Tbk:* • *Collector Advisor, SEMM Business* • *Internal Control, Fraud Management, and ORM Head - Executive Vice President of SEMM Business* • *SUM and SMEs Head - Executive Vice President of SEMM Business* • *Special Unit Management Head - Senior Vice President/Executive Vice President of 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 Unit* • *Regional Manager II - West Java/Bandung (Vice President)* • *Regional Manager for Sumatra/Medan - Vice President (interim)* • *Division Head of Credit Quality Assurance - Vice President* • *Deputy Chief of Credit Control - Vice President (Division Head)* • *Credit Risk Division Head - Vice President* • *Coordinator of Commercial and Corporate Credit - Vice President* • *Senior Credit Officer, West Java* • *Senior Credit Officer for Central Java* • *Credit Review Department Head - Assistant Vice President* • *Credit Department Head - Senior Assistant Manager, Jatinegara Branch* • *Assistant in the Credit Department and Account Office - Assistant Manager, Jatinegara Branch*

Rangkap Jabatan *Concurrent Position*	Anggota Komite Pemantau Risiko PT Bank Sahabat Sampoerna (sejak 2017)	*Member of the Risk Monitoring Committee at PT Bank Sahabat Sampoerna (since 2017)*
Hubungan Afiliasi *Affiliation*	Tidak memiliki hubungan keuangan, kepengurusan, dan kekeluargaan dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.	*Does not have any financial, managerial, or family ties with members of the Board of Commissioners, members of the Board of Directors, or major and controlling shareholders.*
Kepemilikan Saham *Share Ownership*	Tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic.	*Does not hold any shares in either Bank Sahabat Sampoerna or any other company affiliated with the Sampoerna Strategic Group.*

Muhammad Rizaldy

Anggota Komite Audit
Member of the Audit Committee

Kewarganegaraan *Nationality*	**Usia** *Age*	**Domisili** *Domicile*
Indonesia *Indonesian*	62 Tahun *62 years old*	Jakarta Selatan, DKI Jakarta, Indonesia *South Jakarta, Jakarta Special Capital Region, 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	*2023–2026: Decree of the Board of Directors of PT Bank Sahabat Sampoerna No. Skep-003/BSS/DIR/V/2023 dated May 19, 2023*
Riwayat Pendidikan *Educational Background*	• 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 *Expertise*	Ekonomi Perbankan	*Banking Economics*
Sertifikasi Profesi *Professional Certification*	• *Certification in Audit Committee Practice* • Sertifikasi Manajemen Risiko Jenjang 4 • *Qualified Internal Audit*	• *Certification in Audit Committee Practice* • *Level 4 Risk Management Certification* • *Qualified Internal Auditor*
Riwayat Pekerjaan *Work History*	• *Co-Founder & Finance Director* Indoasia Companies Group • *Founder & Director* Bumi Tambang Indonesia Group • *Retail Banking, Micro Banking, & Shari'a Banking Audit Group Head* PT Bank Danamon Indonesia Tbk • *Branch Audit Group Head* PT Bank Danamon Indonesia Tbk • *Team Leader Audit* PT Bank International Indonesia Tbk	• *Co-Founder & Finance Director of Indoasia Companies Group* • *Founder & Director of Bumi Tambang Indonesia Group* • *Retail Banking, Micro Banking, & Shari'a Banking Audit Group Head at PT Bank Danamon Indonesia Tbk* • *Branch Audit Group Head at PT Bank Danamon Indonesia Tbk* • *Audit Team Leader at PT Bank International Indonesia Tbk*
Rangkap Jabatan *Concurrent Position*	Tidak memiliki rangkap jabatan di perusahaan lain di luar Grup Sampoerna Strategic	*Does not hold any concurrent positions at other companies outside the Sampoerna Strategic Group*
Hubungan Afiliasi *Affiliation*	Tidak memiliki hubungan keuangan, kepengurusan, dan kekeluargaan dengan anggota Dewan Komisaris lainnya, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.	*Does not have any financial, managerial, or family relationships with other members of the Board of Commissioners, members of the Board of Directors, or major and controlling shareholders.*
Kepemilikan Saham *Share Ownership*	Tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic.	*Does not hold any shares in either Bank Sahabat Sampoerna or any other company affiliated with the Sampoerna Strategic Group.*

Tugas, Tanggung Jawab, dan Wewenang Komite

Berdasarkan Piagam Komite Audit, tugas dan tanggung jawab Komite Audit, antara lain:

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.
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;

Duties, Responsibilities, and Authorities of the Committee

Based on the Audit Committee Charter, the duties and responsibilities of the Audit Committee include:

1. *Planning and conducting audits, as well as monitoring the follow-up on audit findings, to assess the adequacy of internal controls, including the adequacy of financial reporting processes.*
2. *Participate in the process of providing recommendations regarding the appointment of the Head of the Internal Audit Unit (SKAI).*
3. *Reviewing financial information to be released by Bank to the public and/or regulatory authorities, including financial statements, projections, and other reports related to the Bank's financial information.*
4. *Conducting an examination of the Bank's compliance with applicable laws and regulations regarding the Bank's business activities.*
5. *Providing an independent opinion in the event of a disagreement between management and the public accounting firm regarding the services provided.*
6. *Provide recommendations to the Board of Commissioners regarding the appointment of a Public Accounting Firm (PAF) and a Public Accountant (PA), based on independence, scope of engagement, and fees.*
7. *Reviewing and reporting to the Board of Commissioners on complaints related to the Bank's accounting and financial reporting processes.*
8. *Avoid any form of conflict of interest in the performance of the Bank's management and oversight duties. In the event of a conflict of interest, disclose the conflict of interest in any decision that meets the conditions for a conflict of interest and refrain from taking actions that could potentially harm the Bank or reduce the Bank's profits.*
9. *Conducting reviews and monitoring of the effective and sustainable implementation of GCG.*
10. *Maintaining the confidentiality of the Bank's documents, data, and information.*
11. *Performing other duties relevant to the Audit Committee's functions and assignments from the Board of Commissioners, including but not limited to convening Audit Committee meetings.*
12. *Financial Statements:*
    a. *Thoroughly reviewing the Bank's Work Plan and Budget;*
    b. *Thoroughly reviewing interim and annual financial statements, both audited and unaudited;*
    c. *Thoroughly reviewing reports on the implementation of the work plan and budget and examining items with significant discrepancies in figures or values;*

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 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;

d. Hold regular meetings with relevant departments and the external auditors examining the Bank to request additional information and clarification regarding accounting and financial matters; and
e. Reporting periodically on the results of its monitoring and providing input on matters that require the attention of the Board of Commissioners.

13. Internal Control:
    a. Reviewing and ensuring that the Bank has a standardized internal control system in accordance with applicable practices;
    b. Thoroughly reviewing the audit reports from SKAI and the external auditors examining the Bank to ensure that internal controls have been properly implemented;
    c. Conducting regular meetings with work units involved in the internal control system and its implementation;
    d. Monitoring and evaluating the Board of Directors' follow-up actions on findings from the Internal Audit Committee, external auditors, public accountants, and the Financial Services Authority; and
    e. Reporting periodically on the results of monitoring and evaluation, and providing recommendations or input on matters requiring the attention of the Board of Commissioners.
14. Compliance:
    Monitor and evaluate the company's compliance with internal regulations, Financial Services Authority regulations, and other regulations related to banking operations, including:
    a. Reviewing audit reports related to compliance with internal and external regulations issued by SKAI and the External Auditor;
    b. Monitoring and evaluating the compliance of audits conducted by Public Accounting Firms with applicable audit standards;
    c. Monitoring and evaluating the compliance of financial statements with applicable accounting standards; and
    d. Reporting periodically on the results of its monitoring and providing input on matters requiring the attention of the Board of Commissioners.
15. Internal Audit:
    Monitor and evaluate the effectiveness of the Bank's internal audit function, including:
    a. Conducting a performance evaluation of SKAI regarding the implementation of the annual audit and provide recommendations to the Board of Commissioners regarding the preparation of SKAI's audit plan, scope, and budget;
    b. Evaluating audit programs and scope in the context of implementing SKAI's Annual Work Plan;

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;
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- 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.

c. Evaluating the conduct of audits by SKAI to ensure that audit programs are being conducted with the correct scope;
d. Thoroughly reviewing all significant findings from SKAI's audit results;
e. Holding regular meetings with SKAI to discuss significant audit findings and provide input deemed necessary for the conduct of audits by SKAI;
f. Requesting assistance from SKAI to conduct a special examination or investigation 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 require the attention of the Board of Commissioners;
h. Reviewing the Audit Report and ensure that the Board of Directors promptly takes the necessary corrective actions to address control weaknesses, fraud, compliance issues with policies, laws, and regulations, or other issues identified and reported by SKAI;
i. Ensuring that SKAI communicates with the Board of Directors, the Board of Commissioners, the External Auditor, and the Financial Services Authority (at least once a year);
j. Ensuring that SKAI operates independently and objectively;
k. Providing recommendations to the Board of Commissioners regarding the overall annual remuneration of SKAI as well as performance-based awards;
l. Ensuring that SKAI upholds integrity in the performance of its duties;
m. Providing recommendations on the Internal Audit Charter;
n. Providing recommendations to the Board of Commissioners regarding the appointment of an independent external quality controller to review SKAI's performance; and
o. Ensuring that banks are required to submit reports to the Financial Services Authority regarding the performance of internal audit functions, which consist of:
    - *Reports on the appointment or dismissal of the Head of the Internal Audit Unit;*
    - *Special reports regarding any internal audit findings that are expected to jeopardize the Bank's business continuity;*
    - *Reports on the results of reviews by independent external parties;*
    - *Reports on the implementation and key findings of internal audits; and*
    - *Other reports as requested by the Financial Services Authority.*

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;
        - 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:

16. External Audit:
In providing transparent and high-quality financial information, the Bank utilizes external audit services provided by public accountants and/or public accounting firms. The engagement and appointment of public accountants and/or public accounting firms by the Bank comply with the Financial Services Authority's regulations regarding the use of public accountants and public accounting firms in financial services activities through:
a. Providing recommendations on the proposed appointment of a public accounting firm and/or a public accountant submitted by the Board of Commissioners if the General Meeting of Shareholders has delegated the authority to appoint a public accountant and/or a public accounting firm to the Board of Commissioners;
b. In preparing such recommendations, the Audit Committee may consider:
- *The independence of the Public Accountant, the Public Accounting Firrm, and Public Accounting Firrm personnel by reviewing the name and/or reputation of the Public Accounting Firrm to be invited to participate in the tender;*
- *The scope of the audit by reviewing the audit plan and scope submitted by the selected/appointed KAP, to ensure that the audit plan and scope are appropriate and have taken into account all risks deemed significant;*
- *Audit fees;*
- *The expertise and experience of the Public Accountant, the Public Accounting Firrm and the Public Accounting Firrm's Audit Team;*
- *The audit methodologies, techniques, and tools used by the Public Accounting Firm;*
- *The benefits of a new perspective to be gained through the replacement of the Public Accountant, the Public Accounting Firm, and the*
- *Audit from the Public Accounting Firm;*
- *Potential risks associated with the use of audit services by the same public accounting firm for consecutive periods over a sufficiently long period of time; and/or*
- *The results of the evaluation of the provision of audit services for annual historical financial information by the Public Accountant (PA) and the Public Accounting Firm (KAP) in the previous period, if any.*

c. Reviewing and ensuring that the process for selecting the KAP and/or the AP has been conducted properly in accordance with standard procedures;
d. Conducting an evaluation of the provision of audit services for annual historical financial information by the AP and/or KAP to the Board of Commissioners, such as:

- 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 tindak lanjut auditee terhadap hasil pemeriksaan yang dilakukan oleh auditor eksternal.

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

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.

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:

- *The compliance of the audit conducted by the AP and/or KAP with applicable audit standards;*
- *Adequacy of time allocated for fieldwork;*
- *Review of the scope of services provided and the adequacy of sampling; and*
- *Recommendations for improvements provided by the AP and/or KAP.*

e. Maintain regular communication with the KAP currently auditing the Bank, including the following:
- *Progress of the audit;*
- *Significant findings;*
- *Changes in regulations/provisions regarding accounting and financial reporting from the relevant authorities;*
- *Adjustments made based on the audit results; and*
- *Challenges/obstacles encountered during the audit.*

f. Thoroughly review all significant findings from the audit results of external auditors and other auditing institutions.

g. Monitor and evaluate the auditee's follow-up actions regarding the findings of the external auditor's examination.

h. Reporting periodically on the results of its monitoring and providing input on matters requiring the attention of the Board of Commissioners.

Meanwhile, the Audit Committee has the following authority:

1. *Accessing the Bank's documents, data, and information regarding employees, funds, assets, and resources as required.*
2. *Coordinating and communicating directly and/or convening meetings with employees and management, including the Board of Directors, regarding the duties and responsibilities of the Audit Committee.*
3. *If necessary, the Audit Committee may engage independent parties outside its membership to assist in the performance of its duties.*
4. *Exercise other authorities granted by the Board of Commissioners, in accordance with applicable laws and regulations.*

Committee Independence

Audit Committee members are committed to prioritizing independence, acting objectively, and exercising due diligence in the performance of their duties and responsibilities. Furthermore, the Committee consistently ensures it has no conflicts of interest with other Bank bodies and does not accept interference from Shareholders. This commitment is reflected in the fulfillment of the following aspects of independence:

Aspek Independensi *Aspects of Independence*	**Anggar Budhi** *Nuraini*	**Juwono Akuan** *Rokanta*	**Muhammad** *Rizaldy*
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. *Has no financial relationship with the Board of Commissioners and the Board of Directors.*	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. *Has no management relationship with Shareholders, Subsidiaries, or affiliated companies.*	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. *Has no shareholding relationship with the Bank.*	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Audit. *Has no family relationship with the Board of Commissioners, the Board of Directors, and/or fellow members of the Audit Committee.*	v	v	v

v : Terpenuhi | *Fulfilled*
x : Tidak terpenuhi | *Not Fulfilled*

Sertifikasi Profesi Anggota Komite

Dalam rangka memastikan seluruh anggota Komite Audit memiliki kualifikasi dan kompetensi yang memadai, Bank senantiasa memfasilitasi seluruh anggota Komite Audit untuk mengikuti program sertifikasi. Program ini juga bertujuan untuk menjaga dan meningkatkan pelaksanaan fungsi dan tugas Komite Audit agar dapat tetap berjalan optimal. Sertifikasi yang telah dimiliki oleh anggota Komite Audit Bank sampai dengan tahun 2025 adalah sebagai berikut:

Professional Certification of Committee Members

To ensure that all members of the Audit Committee possess adequate qualifications and competencies, the Bank consistently facilitates opportunities for all Audit Committee members to participate in certification programs. These programs also aim to maintain and enhance the performance of the Audit Committee's functions and duties to ensure they continue to operate optimally. The certifications held by the Bank's Audit Committee members as of 2025 are as follows:

No.	**Sertifikasi** *Certification*	**Jumlah (orang)** *Total (people)*
1.	Sertfikasi *Qualified Internal Auditor* (QIA) *Qualified Internal Auditor (QIA) Certification*	1
2.	Badan Sertifikasi Manajemen Risiko (BSMR) Jenjang 4 *Risk Management Certification Agency (BSMR) Level 4*	26
3.	Badan Sertifikasi Manajemen Risiko (BSMR) Jenjang 7 *Risk Management Certification Agency (BSMR) Level 7*	1
4	Certification in Audit Committee Practice	2

Pelaksanaan Rapat Komite

Komite Audit wajib menyelenggarakan rapat paling sedikit sebanyak 1 (satu) kali dalam 1 (satu) bulan. Sepanjang tahun 2025, Komite Audit telah menyelenggarakan lima belas (15) kali rapat internal secara daring maupun tatap muka. Adapun frekuensi kehadiran dan agenda rapat Komite Audit sepanjang tahun 2025 adalah sebagai berikut:

The Audit Committee Meetings

The Audit Committee is required to hold meetings at least once a month. Throughout 2025, the Audit Committee held fifteen (15) internal meetings, both online and in person. The attendance rates and meeting agendas of the Audit Committee throughout 2025 are as follows:

Nama *Name*	**Jabatan** *Position*	**Total Rapat** *Total Meetings*	**Kehadiran** *Attendance*	**Persentase (%)** *Percentage (%)*
Anggar Budhi Nuraini	Ketua *Chairman*	15	14	93%
Juwono Akuan Rokanta	Anggota *Member*	15	15	100%
Muhammad Rizaldy	Anggota *Member*	15	15	100%
Rata-Rata *Average*				98%

No.	Tanggal *Date*	Agenda	Kehadiran *Attendance*		
			ABN	JAR	MR
1.	21 Januari *January 21*	• Matter Arrising • Realisasi Audit Plan • Laporan Hasil Pemeriksaan • Update sebaran Temuan OJK & SKAI • *Matter Arising* • *Implementation of Audit Plan* • *Inspection Report* • *Update on OJK & SKAI Findings*	v	v	v
2.	25 Februari 2025 *February 25, 2025*	• Matter Arrising • Realisasi Audit Plan • Laporan Hasil Pemeriksaan • OJK Issue Tracking • QA Update • Validasi Trigger Update • *Matter Arising* • *Implementation of the Audit Plan* • *Audit Report* • *OJK Issue Tracking* • *QA Update* • *Validation Trigger Update*	v	v	v
3.	21 Maret 2025 *March 21, 2025*	• Matter Arrising • Realisasi Audit Plan • Laporan Hasil Pemeriksaan • OJK Issue Tracking • Update hasil audit Laporan Keuangan 2024-KAP BDO • Laporan Hasil Pemeriksaan • *Matter Arising* • *Implementation of Audit Plan* • *Audit Report* • *OJK Issue Tracking* • *Update on the 2024 Financial Statement Audit Results - KAP BDO* • *Audit Report*	v	v	v
4.	17 April 2025 *April 17, 2025*	• Matter Arrising • Realisasi Audit Plan 2025 • Laporan Hasil Pemeriksaan • *Matter Arising* • *Implementation of the 2025 Audit Plan* • *Audit Report*	v	v	v
5.	23 Mei 2025 *May 23, 2025*	• Matter Arrising • Realisasi Audit Plan • OJK Issue Tracking • Laporan Hasil Pemeriksaan • Update aplikasi CAAT's • Audit Committee Survey (ACB) • Timeline Pengkinian Metodology • *Matter Arising* • *Audit Plan Implementation* • *OJK Issue Tracking* • *Inspection Report* • *CAAT Application Update* • *Audit Committee Survey (ACB)* • *Methodology Update Timeline*	v	v	v
6.	17 Juni 2025 *June 17, 2025*	• Matter Arrising • Realisasi Audit Plan • OJK Issue Tracking • Laporan Hasil Pemeriksaan • Update monitoring temuan KAP 3 Tahunan • Rencana Visit Komite Audit • *Matter Arising* • *Audit Plan Implementation* • *OJK Issue Tracking* • *Inspection Report* • *CAAT Application Update* • *Audit Committee Survey (ACB)* • *Methodology Update Timeline*	v	v	v

No.	Tanggal *Date*	Agenda	Kehadiran *Attendance*		
			ABN	JAR	MR
7.	22 Juli 2025 *July 22, 2025*	• Matter Arrising • Realisasi Audit Plan • OJK Issue Tracking • Laporan Hasil Pemeriksaan • Audit Committee Survey (ACB) • *Matter Arising* • *Audit Plan Implementation* • *OJK Issue Tracking* • *Audit Findings Report* • *Audit Committee Survey (ACB)*	v	v	v
8.	19 Agustus 2025 *August 19, 2025*	• Matter Arrising • Realisasi Audit Plan • OJK Issue Tracking • Laporan Hasil Pemeriksaan • Update draft Internal Control Over Financial Reporting (ICFOR) • *Matter Arising* • *Audit Plan Implementation* • *OJK Issue Tracking* • *Inspection Report* • *Update on the draft Internal Control Over Financial Reporting (ICFOR)*	v	v	v
9.	23 September 2025 *September 23, 2025*	• Matter Arrising • Realisasi Audit Plan • OJK Issue Tracking • Laporan Hasil Pemeriksaan • *Matter Arising* • *Implementation of Audit Plan* • *OJK Issue Tracking* • *Inspection Report*	v	v	v
10.	21 Oktober 2025 *October 21, 2025*	• Matter Arrising • Realisasi Audit Plan • OJK Issue Tracking • Audit Committee Survey (ACB) • *Matter Arising* • *Implementation of Audit Plan* • *OJK Issue Tracking* • *Inspection Report*	v	v	v
11.	17 November 2025 *November 17, 2025*	Update Hasil Risk Assessment 2025 dan Audit Plan 2026 *Update on the 2025 Risk Assessment Results and the 2026 Audit Plan*	v	v	v
12.	18 November 2025 *November 18, 2025*	• Matter Arrising • Realisasi Audit Plan • OJK Issue Tracking • *Matter Arising* • *Audit Plan Implementation* • *OJK Issue Tracking*	v	v	v
13.	20 November 2025 *November 20, 2025*	Kick off meeting dengan KAP BDO *Kickoff meeting with KAP BDO*	v	v	v
14.	24 November 2025 *November 24, 2025*	Finalisasi hasil risk assessment dan rencana audit 2026 *Finalize the results of the risk assessment and the 2026 audit plan*	x	v	v
15.	18 Desember 2025 *December 18, 2025*	• Matter Arrising • Realisasi Audit Plan • OJK Issue Tracking • Audit Committee Survey (ACB) • *Matter Arising* • *Audit Plan Implementation* • *OJK Issue Tracking* • *Audit Committee Survey (ACB)*	v	v	v

Keterangan | *Remarks*:
ABN: Anggar Budhi Nuraini
JAR: Juwono Akuan Rokanta
MR: Muhammad Rizaldy

Pengembangan Kompetensi

Untuk menunjang Komite Audit dalam melaksanakan tugas dan tanggung jawabnya, Bank Sahabat Sampoerna memberikan kesempatan kepada anggota Komite Audit untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal maupun pihak eksternal. Adapun program pengembangan kompetensi yang diikuti oleh Komite Audit di tahun 2025 adalah sebagai berikut:

Competency Development

To support the Audit Committee in performing its duties and responsibilities, Bank Sahabat Sampoerna provides Audit Committee members with the opportunity to participate in training and competency development programs, whether organized internally or by external parties. The competency development programs participated in by the Audit Committee in 2025 are as follows:

Nama *Name*	**Jabatan** *Position*	**Topik Pelatihan** *Training Topic*	**Penyelenggara** *Organizer*	**Tanggal Pelatihan** *Training Date*
Anggar Budhi Nuraini	Ketua *Chairman*	Sertifikasi Manajemen Risiko *Risk Management Certification*	Garda	Juli 2025 *July 2025*
Juwono Akuan Rokanta	Anggota *Member*	• Sertifikasi Manajemen Risiko • Training Certified Audit Committee Practice • *Risk Management Certification* • *Certified Audit Committee Practice Training*	• Garda • IKAI	• Juli 2025 • Mei 2025 • *July 2025* • *May 2025*
Muhammad Rizaldy	Anggota *Member*	• Sertifikasi Manajemen Risiko • Training Certified Audit Committee Practice • *Risk Management Certification* • *Certified Audit Committee Practice Training*	• Garda • IKAI	• Juli 2025 • Mei 2025 • *July 2025* • *May 2025*

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

Di tahun 2025, Komite Audit telah mengevaluasi dan memberikan rekomendasi terkait penunjukan KAP Tanubrata Sutanto Fahmi Bambang & Rekan (BDO International) dengan kesimpulan sebagai berikut:

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

In 2025, the Audit Committee evaluated and provided recommendations regarding the appointment of KAP Tanubrata Sutanto Fahmi Bambang & Partners (BDO International) with the following conclusions:

Independensi AP, KAP, dan Orang dalam KAP *Independence of the AP, the Firm, and Persons within the Firm*	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 *The Board of Commissioners, the Audit Firm, and the Audit Firm's personnel have no related-party relationships with either Bank Sahabat Sampoerna (BSS) or BSS Management. An independence assessment has been conducted, and a Statement of Independence from the Audit Firm will be issued*
Ruang Lingkup Audit *Scope of the Audit*	Ruang lingkup Audit sesuai dengan standar Audit yang berlaku ketentuan/regulasi (POJK/SEOJK) yang berlaku *The scope of the audit complies with applicable audit standards and regulations (POJK/SEOJK).*
Imbalan Jasa Audit *Audit Fees*	Biaya pelaksanaan Audit tahun 2025 adalah sebesar Rp575.000.000,- (lima ratus tujuh puluh lima juta rupiah) belum termasuk PPN 11%, meningkat 5% dibandingkan audit fee tahun 2024. 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 independent dikenakan pengganti biaya cetak sebesar Rp750.000,- (Tujuh ratus lima puluh ribu rupiah) *The cost of the 2025 audit is Rp575,000,000 (five hundred seventy-five million rupiah), excluding 11% VAT, representing a 5% increase compared to the 2024 audit fee. This cost excludes expenses related to out-of-town assignments; the Company will provide transportation and accommodation in accordance with the Company's applicable standards. An additional fee of Rp750,000 (seven hundred fifty thousand rupiah) will be charged for the printing of the independent audit report.*

Keahlian dan Pengalaman AP, KAP, dan Tim Audit dari KAP *Expertise and Experience of the AP, KAP, and Audit Team from the KAP*	KAP Tanubrata Sutanto Fahmi Bambang & Rekan (BDO International) memiliki keahlian dan pengalaman serta independensi dan professional 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. KAP BDO terdaftar sebagai KAP di Bank Indonesia dan OJK dengan No.STTD.KAP-05/PM.22/2018. AP yang menangani perikatan untuk penugasan Audit di tahun 2025 adalah Bpk.Sutomo dan telah terdaftar sebagai Akuntan Publik OJK dengan No register AP 0007. *Tanubrata Sutanto Fahmi Bambang & Partners (BDO International) possesses the expertise, experience, independence, and professionalism required for every assignment and is well-versed in the latest Financial Accounting Standards (SAK) as they converge with International Financial Reporting Standards (IFRS). In addition, the firm has extensive experience in auditing the banking sector.* *BDO is registered as a public accounting firm with Bank Indonesia and the OJK under No. STTD.KAP-05/PM.22/2018.* *The CPA handling the engagement for the 2025 audit assignment is Mr. Sutomo, who is registered as a Public Accountant with the OJK under CPA Registration No. 0007.*
Metodologi, Teknik, dan Sarana Audit yang Digunakan KAP *Audit Methodology, Techniques, and Tools Used by the Public Accounting Firm*	KAP BDO akan melakukan beberapa prosedur dalam hal pemeriksaan akun-akun yang signifikan antara lain : • Planning the audit (high level review atas laporan keuangan), mendiskusikan dan melakukan presentasi terkait rencana audit • Field work (melakukan testing and assessement atas control dan system manajemen dan mengunjungi sample Cabang) • Final visit (menangani masalah yang belum terselesaikan, pengendalian internal dan diskusi dengan manajemen terkait issue yang ada) • Audit completion (mendiskusikan improvement untuk tahun buku selanjutnya) *BDO will perform several procedures in connection with the examination of significant accounts, including:* • *Planning the audit (high-level review of the financial statements), discussing and presenting the audit plan* • *Fieldwork (testing and assessing controls and management systems, and visiting a sample of branches)* • *Final visit (addressing unresolved issues, internal controls, and discussions with management regarding existing issues)* • *Audit completion (discussing improvements for the next fiscal year)*
Manfaat Fresh Eye Perspectives yang akan Diperoleh melalui Pergantian AP, KAP, dan Tim Audit dari KAP *The Benefits of Fresh Perspectives Gained Through the Replacement of the Public Accountant, the Public Accounting Firm, and the Audit Team from the Public Accounting Firm*	-
Potensi Risiko atas Penggunaan Jasa Audit oleh KAP yang sama Secara Berturut-turut untuk Kurun Waktu yang Cukup Panjang *Potential Risks Associated with Using the Same Public Accounting Firm for Audit Services Consecutively Over a Significant Period of Time*	Tim audit dari KAP telah memenuhi ketentuan audit dari OJK untuk melakukan rotasi dalam melakanakan jasa auditnya agar selalu memperoleh manfaat fresh eye prespectives. Bank telah menggunakan KAP yang sama (KAP BDO memasuki tahun ke enam) dan tahun ini merupakan tahun ke 4 (empat) untuk Akuntan Publik yang bertanggungjawab atas Audit Laporan Keuangan beserta tim Audit yaitu Bpk. Sutomo, dimana sebelumnya Bank pernah menggunakan jasa Akuntan Publik Pak Sutomo (untuk tahun 2020,2021,dan 2024). Hal tersebut masih sesuai dengan ketentuan POJK No.9 Tahun 2023 Tentang Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik Dalam Kegiatan Jasa Keuangan, dimana diatur bahwa pergantian KAP paling lama setiap 7 (tujuh) tahun dan AP setiap 5 (lima) tahun. *The audit team from the KAP has complied with OJK audit regulations regarding rotation in the provision of audit services to consistently benefit from fresh perspectives.* *The Bank has been using the same public accounting firm (BDO Public Accounting Firm, now in its sixth year), and this year marks the fourth year for the public accountant responsible for the financial statement audit and his audit team, Mr. Sutomo, as the Bank previously engaged Mr. Sutomo's services (for the years 2020, 2021, and 2024).* *This remains in accordance with the provisions of POJK No. 9 of 2023 on the Use of Public Accountants and Public Accounting Firms in Financial Services Activities, which stipulates that the rotation of the Public Accounting Firm (KAP) must occur at most every 7 (seven) years and that of the Public Accountant (AP) every 5 (five) years.*

Hasil Evaluasi terhadap Pelaksanaan Pemberian Jasa Audit atas Informasi Keuangan Historis Tahunan oleh AP dan KAP pada Periode Sebelumnya *Results of the Evaluation of the Provision of Audit Services on Annual Historical Financial Information by Public Accountants and Public Accounting Firms in the Previous Period*	Agar memastikan seluruh hasil pemeriksaan yang disampaikan dan disepakati oleh Manajemen PT. Bank Sahabat Sampoerna dapat terpenuhi, antara lain sebagai berikut : • Tinjauan terhadap proses penilaian 3 pilar dalam inspeksi dan Analisa kredit • Tinjauan terhadap SOP penilaian 3 pilar dalam inspeksi dan Analisa kredit • Proses identifikasi dan pemantauan transaksi dengan pihak berelasi • Ketidaksesuaian pencatatan pada kolektibilitas OJK, jumlah hari tunggakan (DPD) dan tahapan (staging) • Bank belum mempertimbangkan opini Audit dengan Emphasis of Metter pada penilaian kualitas kredit debitur • Bank belum Menyusun Tata Kelola Informasi (TI) untuk mengelola dan memantau keamanan akses vendor *To ensure that all audit findings communicated to and agreed upon by the management of PT. Bank Sahabat Sampoerna are addressed, the following measures will be taken:* • *Review of the 3-pillar assessment process in credit inspection and analysis* • *Review of the SOP for the 3-pillar assessment in credit inspection and analysis* • *Process for identifying and monitoring transactions with related parties* • *Discrepancies in OJK collectibility records, number of days past due (DPD), and staging* • *The Bank has not taken into account the Audit Opinion with Emphasis of Matter regarding the assessment of borrower credit quality* • *The bank has not established an Information Technology (IT) governance framework to manage and monitor vendor access security*

Mekanisme Pengangkatan dan Pemberhentian Ketua Komite Audit

Mekanisme pengangkatan dan pemberhentian Komite Audit telah diatur berdasarkan Piagam Komite Audit. Adapun proses pengangkatan dan pemberhentiannya dilaksanakan berdasarkan Keputusan Dewan Komisaris, dimana Ketua Komite Audit berasal dari Komisaris Independen yang telah memenuhi persyaratan dan kriteria yang ditetapkan. Masa jabatan Ketua Komite Audit ditetapkan selama 2 (dua) tahun atau lebih, dengan ketentuan tidak melebihi masa jabatan anggota Dewan Komisaris. Selanjutnya, pengangkatan kembali Ketua Komite Audit ditetapkan berdasarkan hasil penilaian yang dilakukan oleh Dewan Komisaris.

Mechanism for the Appointment and Dismissal of the Audit Committee Chairman

The mechanism for the appointment and removal of the Audit Committee is governed by the Audit Committee Charter. The appointment and removal process is carried out based on a resolution of the Board of Commissioners, whereby the Chairman of the Audit Committee is selected from among the Independent Commissioners who have met the established requirements and criteria. The term of office for the Chairman of the Audit Committee is set at 2 (two) years or longer, provided that it does not exceed the term of office of the members of the Board of Commissioners. Furthermore, the reappointment of the Chairman of the Audit Committee is determined based on the results of an assessment conducted 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

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

Pelaksanaan Tugas Komite di Tahun 2025

Komite Audit Komite Audit bertindak secara independen dalam melaksanakan tugas dan tanggung jawabnya.

Implementation of the Committee's Duties in 2025

The Audit Committee acts independently in carrying out its duties and responsibilities.

Program Kerja *Work Program*	**Pelaksanaan** *Implementation*
Memantau dan mengevaluasi pelaksanaan tugas SKAI, dalam proses perencanaan dan pelaksanaan Audit *Monitoring and evaluating the implementation of SKAI's duties, in the planning and execution of audits*	Dalam proses penyusunan rencana kerja tahunan serta pelaksanaan Audit, Komite Audit telah melaksanakan kewajiban dengan memberikan evaluasi dan rekomendasi, antara lain: • 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 pelaksaan rapat komite audit yang dilaksanakan minimal 1 kali dalam sebulan; • Memantau pelaksanaan tindak lanjut oleh Direksi atas hasil temuan SKAI dan OJK • Meminta penjelasan dari unit kerja Finance & Accounting sebelum menerbitkan Laporan Keuangan Publikasi setiap kuarter *In the process of preparing the annual work plan and conducting audits, the Audit Committee has fulfilled its obligations by providing evaluations and recommendations, including:* • *Evaluating the annual audit plan, scope, and budget of SKAI, and providing recommendations to the Board of Commissioners;* • *Ensuring that Management imposes no restrictions on the audit process, including resource requirements;* • *Requesting SKAI to conduct a special audit regarding cases of non-compliance with laws and regulations, as well as indications of fraud, or to investigate high-risk findings in greater depth;* • *Monitoring the implementation/execution of the audit work plan during each audit committee meeting, held at least once a month;* • *Monitor the Board of Directors' follow-up actions on the findings of SKAI and OJK* • *Requesting explanations from the Finance & Accounting department prior to issuing the Quarterly Financial Statements*
Memantau dan mengevaluasi pelaksanaan tugas Kantor Akuntan Publik (KAP) terhadap pelaksanaan pemberian jasa audit Laporan Keuangan Bank *Monitor and evaluate the performance of the Public Accounting Firm (KAP) regarding the provision of audit services for the Bank's Financial Statements*	• 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. • *Verifying that the audit conducted by the public accounting firm complies with applicable audit standards;* • *Ensuring that sufficient time is allocated for fieldwork;* • *Reviewing the scope of services provided and the adequacy of sampling;* • *Monitoring the Board of Directors' follow-up actions on the findings of the Public Accounting Firm;* • *In general, the Audit Committee has evaluated the results of the financial statement audit by the Public Accounting Firm, which was deemed to have been conducted effectively and objectively; and* • *Submitting the Audit Committee's Evaluation Report on the Provision of Audit Services for the 2023 Fiscal Year to the Board of Commissioners for subsequent submission to the Financial Services Authority on June 25, 2024.*
Memberikan rekomendasi kepada Dewan Komisaris mengenai penunjukan KAP untuk melakukan jasa audit Laporan Keuangan Bank. *Providing recommendations to the Board of Commissioners regarding the appointment of the KAP to perform audit services for the Bank's Financial Statements.*	Merekomendasikan penunjukan KAP Tanubrata, Sutanto, Fahmi, Bambang & Rekan, anggota jaringan BDO International Limited (KAP BDO) untuk melakukan audit Laporan Keuangan tahun 2025 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 2025 kepada Dewan Komisaris untuk selanjutnya dilaporkan kepada Otoritas Jasa Keuangan melalui Aplikasi Pelaporan Online (APOLO) pada tanggal 20 Oktober 2025. *Recommending the appointment of Tanubrata, Sutanto, Fahmi, Bambang & Partners, a member firm of the BDO International Limited network (BDO), to conduct the audit of the 2025 Financial Statements based on independence, scope of engagement, expertise/experience, audit techniques, and fees, to be subsequently submitted to the Board of Commissioners; and* *Submitting a recommendation regarding the appointment of KAP BDO for the 2025 fiscal year audit services to the Board of Commissioners for subsequent reporting to the Financial Services Authority via the Online Reporting Application (APOLO) on October 20, 2025.*

Rekomendasi

Berdasarkan pelaksanaan tugas yang dilakukan sepanjang tahun 2025, Komite Audit telah menyampaikan rekomendasi terkait pengelolaan Bank, antara lain:

Recommendations

Based on the duties performed throughout 2025, the Audit Committee has submitted recommendations regarding the Bank's management, including:

Perkreditan *Credit*	• Komite Audit meminta SKAI melakukan identifikasi terkait dengan potensi pelanggaran pada Kantor Fungsional untuk meyakini tidak ada pihak-pihak terkait dengan Bank • Hasil pemeriksaan SKAI terhadap unit kerja yang dalam beberapa periode memperoleh rating "*Unsatisfactory*", Komite Audit meminta : › Dilakukan pemetaan untuk mengidentifikasi dan perlu perhatian lebih lanjut. Pemetaan ini didasarkan pada kriteria diantaranya perubahan personil kunci maupun adanya kelemahan proses yang menjadi temuan SKAI › Agar disampaikan sanksi yang telah diberikan kepada petugas terkait, baik pada pemeriksaan tahun 2025 maupun pemeriksaan sebelumnya atas kelalaian yang dilakukan • Kelemahan proses verifikasi maupun analisa kredit antara lain, Komite Audit memberi masukan agar dilakukan pemeriksaan terkait dengan kelengkapan dokumen underlying project dan analisa keuangan calon debitur dan dilakukan pelatihan terhadap personil yang melakukan proses kredit tersebut • Komite Audit meminta agar dibuat rekapitulasi *root cause* atas temuan-temuan terkait perkreditan di cabang, sehingga dapat dianalisa dan diidentifikasi lebih lanjut atas akar penyebab kelemahan, seperti aspek SDM, pemahaman kebijakan, dan faktor terkait lainnya. • Agar menjadi pertimbangan dalam implementasi pemberian rekomendasi atas debitur dengan risiko tinggi yang diperiksa, Komite Audit menyarankan agar SKAI juga dapat memberikan rekomendasi penyesuaian kualitas kredit apabila dinilai diperlukan. • Bank diminta untuk melakukan evaluasi secara periodik dan intens terhadap portfolio kredit besar, yang memiliki trigger penurunan usaha maupun cashflow, yang dapat berdampak terhadap kualitas asset Bank • Komite Audit meminta agar dipastikan terkait RAC, penurunan kualitas portfolio mitra, dan monitoring, serta penerapan sanksi pihak-pihak pemroses jika ditemukan pelanggaran, dan dilakukan pengecekan aturan internal ataupun regulator • Terkait pemberian resktruktur, Komite Audit meminta dapat dipastikan kembali proses awal pengajuan restruktur sampai dengan persetujuannya, dan proses pengajuan perpanjangan restruktur tersebut. • Komite Audit meminta untuk untuk dimonitoring tekait pemasangan Hak Tanggungan (HT) yang belum terselesaikan • *The Audit Committee requested SKAI to identify potential violations within the Functional Offices to ensure that no parties associated with the Bank* • *Based on SKAI's review of work units that received an "Unsatisfactory" rating over several periods, the Audit Committee requests:* › *A mapping exercise be conducted to identify areas requiring further attention. This mapping is based on criteria including changes in key personnel and the presence of process weaknesses identified by SKAI* › *That sanctions previously imposed on relevant staff—whether from the 2025 audit or prior audits—regarding committed negligence be communicated* • *Weaknesses in the credit verification and analysis processes include the following: The Audit Committee recommends conducting an examination of the completeness of the underlying project documentation and the financial analysis of prospective borrowers, as well as providing training for the personnel involved in the credit process* • *The Audit Committee requests that a summary of root causes be prepared for findings related to lending at branches, so that the root causes of weaknesses—such as human resources aspects, policy understanding, and other related factors—can be further analyzed and identified.* • *To be taken into consideration when implementing recommendations regarding high-risk borrowers under review, the Audit Committee recommends that SKAI also provide recommendations for credit quality adjustments if deemed necessary.* • *The Bank is requested to conduct periodic and intensive evaluations of large credit portfolios that exhibit triggers for business or cash flow deterioration, which could impact the Bank's asset quality* • *The Audit Committee requests that matter related to RAC, the deterioration of partner portfolios, and monitoring be ensured, as well as the imposition of sanctions on processing parties if violations are found, and that internal or regulatory rules be checked* • *Regarding the granting of restructuring, the Audit Committee requests that the initial process from the submission of a restructuring request through to its approval, as well as the process for requesting an extension of such restructuring, be re-confirmed.* • *The Audit Committee requested ongoing monitoring of the pending establishment of Mortgage Security Rights (HT).*

Operasional *Operations*	• Komite Audit meminta agar dilakukan pengecekan terhadap kesesuaian pencatatan amortisasi dan depresiasi pada unit kerja Finance & Accounting • Komite Audit mengingatkan kembali untuk dipastikan terkait selisih lebih/kurang saldo ATM pada Cabang dan dipastikan telah dicatat pada risiko operasional • Terdapat Keterlambatan SLA Transaksi RTGS & SKN > 1 Jam , Komite Audit meminta agar menjadi perhatian, dan unit pengelola risiko diharapkan untuk segera melaporkannya kepada SKMR pada hari yang sama. • Komite Audit meminta untuk dipastikan terkait dengan proses dan perijinan pengajuan produk dan aktivitas baru • Terkait kelengkapan dan ketidaksesuaian data mandatory nasabah, Komite Audit memberi masukan agar dapat dilakukan pembenahan disisi cabang sebagai inputer, dan unit kerja APUPPT Kantor Pusat • Terkait kesalahan transaksi outgoing, Komite Audit merekomendasikan untuk kesalahan tsb dilaporkan sebagai risk event dan mintakan Berita Acara (BA) atas kesalahan tsb • *The Audit Committee requests that a review be conducted regarding the accuracy of amortization and depreciation entries in the Finance & Accounting work unit* • *The Audit Committee reiterates the need to verify discrepancies in ATM balances at branches and ensure they are recorded under operational risk* • *There are SLA delays for RTGS & SKN transactions exceeding 1 hour; the Audit Committee requests that this be addressed, and the risk management unit is expected to report it to SKMR on the same day.* • *The Audit Committee requests confirmation regarding the processes and approvals for new product submissions and activities* • *Regarding the completeness and discrepancies in mandatory customer data, the Audit Committee recommends that improvements be made at the branch level as the data input source, and by the APUPPT unit at the Head Office* • *Regarding outgoing transaction errors, the Audit Committee recommends that such errors be reported as risk events and that an official report be prepared regarding these errors*
TI *IT*	• Komite Audit memberikan masukan untuk dipastikan terkait ketentuan internal yang mengatur masa retensi untuk *back up* rekaman, sehingga pembuatan PKS merujuk kepada ketentuan tersebut. • Komite Audit memberi masukan agar adanya penjelasan untuk budget khususnya yang memiliki materialitas besar, pada realisasi anggaran IT • Komite Audit membahas terkait pelaksanaan project, sehingga kedepan implementasi beberapa project dapat ditingkatkan agar tujuan dari project tersebut bisa tercapai secara optimal • Perihal assessement berupa penetapan *server* yang wajib / dan monitoring, komite memberi masukan bahwa mitigasi risiko terkait asset yang belum dimonitoring. • Komite Audit meminta dilakukan action plan atas hasil *penetration test* • *The Audit Committee provided input to ensure compliance with internal regulations governing the retention period for backup records, so that the preparation of the PKS refers to those regulations.* • *The Audit Committee provided input regarding the need for explanations regarding the budget, particularly for items with significant materiality, in the IT budget implementation* • *The Audit Committee discussed project implementation, so that in the future the implementation of several projects can be improved to ensure the project objectives are optimally achieved* • *Regarding the assessment involving the identification of mandatory servers and monitoring, the committee provided input on risk mitigation related to assets that have not yet been monitored.* • *The Audit Committee requests that an action plan be developed based on the results of the penetration test*
Pelaporan *Reporting*	Masih ditemukan data-data pelaporan SLIK yang dilakukan perbaikan, Komite Audit meminta agar dipastikan bahwa seluruh data setelah *cut off* audit telah diperbaiki sebelum adanya tindak lanjut berupa ketetapan manajemen yang nanti akan dituangkan dalam bentuk SOP atau ketentuan internal untuk standarisasi pelaporan *Corrections are still being made to SLIK reporting data; the Audit Committee requests that it be ensured that all data after the audit cutoff date has been corrected prior to any follow-up in the form of management decisions, which will later be formalized as SOPs or internal regulations for standardizing reporting*

Lain-lain *Miscellaneous*	• Dalam hal pelaksanaan kunjungan ke debitur, Komite Audit menyarankan agar teknis dan mekanisme pelaksanaannya diatur dengan jelas, hal ini bertujuan untuk menghindari potensi sengketa dengan auditee dan memastikan adanya bukti yang dapat dipertanggungjawabkan. • Komite Audit memberikan masukan mengenai pentingnya meningkatkan kesadaran terkait regulasi. Saat dilakukan pemeriksaan oleh SKAI, pihak audite dapat diminta untuk menyampaikan regulasi yang menjadi acuan/dasar dalam proses yang dijalankan dan dilakukan validasi oleh auditor. • Sehubungan dengan Rencana Aksi Pemulihan (RAP), KA menyampaikan perhatian khusus dan meminta agar hal ini menjadi fokus dalam pemeriksaan SKMR • Terkait pelaksanaan offsite audit dan monitoring, Komite Audit memberikan masukan untuk mekanisme validasi trigger perlu distandarisasi sehingga dapat diterapkan secara konsisten dan efektif, antara lain : • Penetapan risk level pada trigger, agar mempertimbangkan impact/risiko dari trigger tersebut sehingga bisa menjadi prioritas untuk dilakukan validasi setiap kuartal khususnya dengan tingkat risiko tinggi • Validasi hasil trigger menjadi sample untuk dilakukan pemeriksaan oleh Auditor, sehingga trigger-trigger tersebut dapat dikembangkan lebih lanjut oleh tim MIS berdasarkan hasil validasi yang ada. • Selain itu, Komite Audit meminta agar data yang diperoleh dari hasil trigger CAATs dipergunakan untuk keperluaan pemeriksaan, sehingga lebih optimal pemanfaatannya. • SKAI diminta untuk menyampaikan trigger-trigger yang telah teridentifikasi melalui CAAT's, termasuk pemanfaatan trigger tersebut oleh auditor serta contoh temuan yang telah disampaikan kepada auditee berdasarkan trigger dimaksud. • Komite Audit meminta untuk dibuatkan list auditor yang telah mengikuti pelatihan/pendidikan serta tahun pelaksanaannya, dan dapat dipastikan peserta training (Karyawan) mengikuti pelaksanaan training sampai dengan akhir training. Selain itu, SKAI disarankan untuk menyusun kebutuhan training wajib *(minimum requirement)* auditor per jabatan serta rencana pemenuhannya. • Komite Audit merekomendasikan agar aktivitas yang dilakukan oleh SKAI, seperti forum tanya jawab atau diskusi, dapat diselenggarakan dalam bentuk ROI dan dipublikasikan melalui CA News sebagai sarana edukasi dan sosialisasi yang bermanfaat bagi seluruh unit kerja. Terkait pelaksanaan ROI yang telah dilakukan SKAI kepada seluruh cabang, Komite Audit memberi masukan agar dilakukan review terhadap Cabang atas pemahaman materi yang disampaikan, dengan memberikan *pre test* sebelum SKAI melakukan Audit di Cabang dan menanyakan secara langsung pemahaman serta perbaikan proses setelah mengikuti ROI. • *Regarding visits to debtors, the Audit Committee recommends that the technical aspects and mechanisms for conducting such visits be clearly defined; this is intended to avoid potential disputes with the auditee and ensure the existence of verifiable evidence.* • *The Audit Committee provided input on the importance of raising awareness regarding regulations. During an audit conducted by SKAI, the auditee may be asked to provide the regulations that serve as the reference or basis for the processes being conducted, which are then validated by the auditor.* • *Regarding the Recovery Action Plan (RAP), the Audit Committee expressed particular concern and requested that this be a focus of the SKMR audit* • *Regarding the implementation of offsite audits and monitoring, the Audit Committee provided input that the trigger validation mechanism needs to be standardized so that it can be applied consistently and effectively, including:* • *Assigning risk levels to triggers to account for their impact and risk, so that high-risk triggers can be prioritized for quarterly validation* • *Validation results from triggers serve as a sample for review by the Auditor, so that these triggers can be further developed by the MIS team based on the existing validation results.* • *Additionally, the Audit Committee requests that data obtained from CAAT trigger results be utilized for audit purposes to optimize their use.* • *SKAI is requested to report on the triggers identified through CAATs, including how auditors utilize these triggers and examples of findings communicated to the auditee based on the identified triggers.* • *The Audit Committee requests a list of auditors who have completed training or education, along with the year the training was conducted, and confirmation that the trainees (employees) attended the training sessions through to completion. In addition, SKAI is advised to establish mandatory training requirements (minimum requirements) for auditors by position, along with a plan for meeting those requirements.* • *The Audit Committee recommends that activities conducted by SKAI, such as Q&A sessions or discussions, be organized in the form of ROI sessions and published through CA News as a useful educational and outreach tool for all work units. Regarding the ROI sessions SKAI has conducted for all branches, the Audit Committee suggests that a review be conducted of the branches' understanding of the material presented, by administering a pre-test before SKAI conducts an audit at the branch and directly inquiring about their understanding and process improvements following the ROI session.*

Kiri ke Kanan | *Left to Right:*

Adriana Riani Novitasari
Anggota Komite Remunerasi dan Nominasi
Member of the Remuneration and Nomination Committee

Khoe Minhari Handikusuma
Ketua Komite Remunerasi dan Nominasi
Chairman of the Remuneration and Nomination Committee

Budi Setiawan Halim
Anggota Komite Remunerasi dan Nominasi
Member of the Remuneration and Nomination Committee

Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi merupakan organ pendukung yang berfungsi untuk membantu Dewan Komisaris dalam merumuskan, mengevaluasi, serta mengawasi kebijakan remunerasi bagi organ Bank. Selain itu, Komite Remunerasi dan Nominasi memberikan rekomendasi terkait proses pencalonan anggota Dewan Komisaris, anggota Direksi, serta pihak-pihak eksternal yang menjadi bagian dari komite Bank.

Remuneration and Nomination Committee

The Remuneration and Nomination Committee is a supporting body tasked with assisting the Board of Commissioners in formulating, evaluating, and overseeing remuneration policies for the Bank's bodies. In addition, the Remuneration and Nomination Committee provides recommendations regarding the nomination process for members of the Board of Commissioners, members of the Board of Directors, and external parties serving on the Bank's committees.

Komposisi dan Profil Komite

Di tahun 2025, komposisi Komite Remunerasi dan Nominasi tidak mengalami perubahan. Komite Remunerasi dan Nominasi Bank terdiri 1 (satu) orang Ketua yang merupakan Komisaris Independen, 1 (satu) orang Komisaris, dan 1 (satu) orang Pejabat Eksekutif yang membidangi Direktorat Sumber Daya Manusia. Adapun komposisi Komite Remunerasi dan Nominasi Bank hingga akhir tahun 2025 adalah sebagai berikut:

Committee Composition and Profile

In 2025, the composition of the Remuneration and Nomination Committee remained unchanged. The Bank's Remuneration and Nomination Committee consists of 1 (one) Chairperson, who is an Independent Commissioner, 1 (one) Commissioner, and 1 (one) Executive Officer in charge of the Human Resources Directorate. The composition of the Bank's Remuneration and Nomination Committee through the end of 2025 is as follows:

Nama *Name*	**Jabatan** *Position*	**Dasar Pengangkatan** *Basis of Appointment*	**Periode Jabatan** *Term of Office*
Khoe Minhari Handikusuma	Ketua *Chairman*	• 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' Decree of PT Bank Sahabat Sampoerna No. Skep 004/BSS/DIR/V/2023 dated May 19, 2023* • *Board of Directors' Decree of PT Bank Sahabat Sampoerna No. Skep-004/BSS/DIR/V/2020 dated May 18, 2020*	2023-2026
Budi Setiawan Halim	Anggota *Member*	• 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. • *Board of Directors' Decree of PT Bank Sahabat Sampoerna No. Skep-004/BSS/DIR/V/2023 dated May 19, 2023;* • *Board of Directors' Decree of PT Bank Sahabat Sampoerna No. Skep-004/BSS/DIR/V/2020 dated May 18, 2020; and* • *Memorandum on the Appointment of New Members and Replacement of Members of the Board of Commissioners' Auxiliary Committee No. 018/IM/KOM/BSS/V/2017 dated May 18, 2017.*	2023-2026
Adriana Riani Novitasari	Anggota *Member*		

Khoe Minhari Handikusuma

Ketua Komite Remunerasi dan Nominasi
Chairman of the 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 is available in the Board of Commissioners section of the Company Profile chapter in this Annual Report.

Budi Setiawan Halim

Anggota Komite Remunerasi dan Nominasi
Member of the 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 is available in the Board of Commissioners section of the Company Profile chapter in this Annual Report.

Adriana Riani Novitasari

Anggota Komite Remunerasi dan Nominasi
Member of the 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 is available in the Executive Profiles section of the Company Profile chapter in this Annual Report.

Independensi

Anggota Komite Remunerasi dan Nominasi senantiasa menjunjung tinggi prinsip independensi serta melaksanakan tugas dan tanggung jawabnya secara objektif dan penuh kehati-hatian. Selain itu, Komite Remunerasi dan Nominasi memastikan tidak terdapat benturan kepentingan dengan organ Bank lainnya serta tidak adanya intervensi dari para Pemegang Saham. Komitmen tersebut tercermin dalam pemenuhan aspek independensi sebagai berikut:

Independence

Members of the Remuneration and Nomination Committee consistently uphold the principle of independence and perform their duties and responsibilities objectively and with due diligence. Additionally, the Remuneration and Nomination Committee ensures there are no conflicts of interest with other Bank bodies and no interference from Shareholders. This commitment is reflected in the fulfillment of the following aspects of independence:

Aspek Independensi *Aspects of Independence*	**Khoe Minhari Handikusuma**	**Budi Setiawan Halim**	**Adriana Riani** *Novitasari*
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. *Has no financial relationship with the Board of Commissioners and the Board of Directors.*	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. *Has no management relationship with Shareholders, Subsidiaries, or affiliated companies.*	v	x Komisaris Utama adalah perwakilan dari Pemegang Saham *The Chairman of the Board of Commissioners is a representative of the shareholders*	v
Tidak memiliki hubungan kepemilikan saham di Bank. *Has no shareholding relationship with the Bank.*	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Audit. *Has no family relationship with the Board of Commissioners, the Board of Directors, and/or fellow members of the Audit Committee.*	v	v	v

v : Terpenuhi | *Fulfilled*
x : Tidak terpenuhi | *Not Fulfilled*

Sertifikasi Profesi Anggota Komite

Bank Sahabat Sampoerna senantiasa memastikan seluruh anggota Komite Remunerasi dan Nominasi memiliki kualifikasi dan kompetensi yang memadai dalam menjalankan tugas dan tanggung jawabnya dengan memfasilitasi seluruh anggota Komite untuk mengikuti program sertifikasi. Program ini juga bertujuan untuk

Professional Certification of Committee Members

Bank Sahabat Sampoerna consistently ensures that all members of the Remuneration and Nomination Committee possess the necessary qualifications and competencies to conduct their duties and responsibilities by facilitating their participation in certification programs. This program also aims to maintain and improve the performance of menjaga dan meningkatkan pelaksanaan fungsi dan tugas Komite Remunerasi dan Nominasi agar dapat tetap berjalan optimal. Sertifikasi yang telah dimiliki oleh anggota Komite Remunerasi dan Nominasi Bank sampai dengan tahun 2025 adalah sebagai berikut:

the Remuneration and Nomination Committee's functions and duties so that they can continue to operate optimally. The certifications held by members of Bank Sahabat Sampoerna's Remuneration and Nomination Committee as of 2025 are as follows:

No.	Sertifikasi *Certification*	Jumlah (orang) *Total (persons)*
1.	Sertifikasi Manajemen Risiko Jenjang 7 *Level 7 Risk Management Certification*	2
2.	Sertifikasi Manajemen Risiko Jenjang 6 *Level 6 Risk Management Certification*	1

Pelaksanaan Rapat Komite

Remuneration and Nomination Committee Meeting

Sepanjang tahun 2025, Komite Remunerasi dan Nominasi telah melaksanakan pertemuan sebanyak 4 (empat) kali dengan pembahasan topik terkait dengan , antara lain:

Throughout 2025, the Remuneration and Nomination Committee held four (4) meetings to discuss topics related to, among others:

No.	Tanggal *Date*	Agenda	Kehadiran *Attendance*		
			KMH	BSH	ARN
1.	27 Februari 2025 *February 27, 2025*	Paparan atas pelaksanaan penilaian kinerja Karyawan *Presentation on the Implementation of Employee Performance Appraisals*	V	V	V
2.	09 Juli 2025 *July 9, 2025*	Paparan struktur organisasi Bank *Bank Organizational Structure Overview*	V	V	V
3.	05 September 2025 *September 5, 2025*	Pemenuhan persyaratan dan kelengkapan atas Permohonan Penilaian Kemampuan dan Kepatuhan atas pencalonan Direktur Bank *Fulfillment of requirements and completeness of the Application for Assessment of Competency and Compliance regarding the nomination of a Bank Director*	V	V	V
4.	05 November 2025 *November 5, 2025*	Tindak lanjut hasil Penilaian Kemampuan dan Kepatuhan calon Direktur Bank *Follow-up on the Results of the Assessment of Competency and Compliance of Bank Director Candidates*	V	V	V

Keterangan | *Remark*:
KMH: Khoe Minhari Handikusuma
BSH: Budi Setiawan Halim
ARN: Adriana Riani Novitasari

Adapun frekuensi kehadiran dan agenda rapat Komite Remunerasi dan Nominasi sepanjang tahun 2025 adalah sebagai berikut:

The attendance frequency and meeting agendas of the Remuneration and Nomination Committee throughout 2025 are as follows:

Nama *Name*	Jabatan *Position*	Total Rapat *Total Meetings*	Kehadiran *Attendance*	Persentase (%) *Percentage (%)*
Khoe Minhari Handikusuma	Ketua *Chairman*	4	4	100%
Budi Setiawan Halim	Anggota *Member*	4	4	100%
Adriana Riani Novitasari	Anggota *Member*	4	4	100%
Rata-Rata *Average*				100%

Pengembangan Kompetensi

Untuk menunjang Komite Remunerasi dan Nominasi dalam melaksanakan tugas dan tanggung jawabnya, Bank Sahabat Sampoerna memberikan kesempatan kepada anggota Komite Remunerasi dan Nominasi untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal maupun pihak eksternal. Adapun program pengembangan kompetensi yang diikuti oleh Komite Remunerasi dan Nominasi di tahun 2025 adalah sebagai berikut:

Competency Development

To support the Remuneration and Nomination Committee in performing its duties and responsibilities, Bank Sahabat Sampoerna provides members of the Remuneration and Nomination Committee with the opportunity to participate in training and competency development programs, whether organized internally or by external parties. The competency development programs participated in by the Remuneration and Nomination Committee in 2025 are as follows:

Nama *Name*	Jabatan *Position*	Topik Pelatihan *Training Topic*	Penyelenggara *Organizer*	Tanggal Pelatihan *Training Date*
Khoe Minhari Handikusuma	Ketua *Chairman*	Sertifikasi Manajemen Risiko *Risk Management Certification*	Garda	Juni 2025 *June 2025*
Budi Setiawan Halim	Anggota *Member*	Sertifikasi Manajemen Risiko *Risk Management Certification*	Garda	Juni 2025 *June 2025*
Adriana Riani Novitasari	Anggota *Member*	• Sertifikasi Manajemen Risiko • HR Tech Summit 2025 • *Risk Management Certification* • *HR Tech Summit 2025*	• Garda • People Matters	• Juni 2025 • Maret 2025 • *June 2025* • *March 2025*

Pelaksanaan Tugas Komite di Tahun 2025

Selain melaksanakan program kerja strategis, Komite Remunerasi dan Nominasi juga telah menyampaikan sejumlah rekomendasi pada tahun 2025, antara lain:

1. Penilaian kinerja individual karyawan perlu sejalan dengan pencapaian tingkat kinerja Bank dan Unit Kerja Bisnis yang dapat mempengaruhi tingkat kemampuan Bank membayarkan apresiasi finansial kepada karyawan. Manajemen perlu memperhatikan pemberian apresiasi dalam bentuk non finansial dalam bentuk pengembangan karyawan dan kesempatan pelatihan dan pembimbingan untuk pencapaian produktifitas kerja yang lebih baik.
2. Dalam rangka peningkatan motivasi dan kompetensi karyawan di fungsi penjualan (*sales lending dan sales funding*), Bank secara periodik melakukan review terhadap skema insentif yang mengacu kepada pencapaian target KPI. Di lain sisi, peningkatan kompetensi fungsional (*teknis*) dilakukan dengan perbaikan modul pendidikan dan pelatihan di bidang penjualan (*sales*) dan kredit.
3. Memastikan efektifitas organisasi yang ramping (*lean*) untuk percepatan pengambilan keputusan, perbaikan tingkat layanan kepada nasabah dan pemanfaatan teknologi informasi dalam proses kerja serta optimalisasi biaya operasional.

Committee Activities in 2025

In addition to implementing strategic work programs, the Remuneration and Nomination Committee has also submitted a number of recommendations for 2025, including:

1. *Individual employee performance evaluations must align with the performance levels of the Bank and its Business Units, as these can influence the Bank's ability to provide financial incentives to employees. Management should also consider offering non-financial incentives, such as employee development programs and opportunities for training and mentoring, to enhance work productivity.*
2. *To enhance employee motivation and competence in the sales functions (sales lending and sales funding), the Bank periodically reviews its incentive schemes based on the achievement of KPI targets. Meanwhile, improvements in functional (technical) competence are achieved through enhancements to education and training modules in the areas of sales and credit.*
3. *Ensuring the effectiveness of a lean organizational structure to accelerate decision-making, improve customer service levels, leverage information technology in work processes, and optimize operational costs.*

Kiri ke Kanan | *Left to Right:*

Harry Mulyadi Santoso
Anggota Komite Pemantau Risiko
Member of the Risk Monitoring Committee

Juwono Akuan Rokanta
Anggota Komite Pemantau Risiko
Member of the Risk Monitoring Committee

Ikun M. Soedrajat
Anggota Komite Pemantau Risiko
Member of the Risk Monitoring Committee

Khoe Minhari Handikusuma
Ketua Komite Pemantau Risiko
Chairman of the Risk Monitoring Committee

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.

Risk Monitoring Committee

The Risk Monitoring Committee is a supporting body established to assist the Board of Commissioners in fulfilling its responsibility to oversee risks that may arise from the Bank's operational activities. The Risk Monitoring Committee is also tasked with evaluating the alignment between risk management policies and their implementation within the Bank.

Piagam Komite

Bank Sahabat Sampoerna telah memiliki Piagam Komite Pemantau Risiko yang telah diperbarui dan disetujui oleh Dewan Komisaris pada Februari 2025 yang disusun sesuai dengan peraturan yang berlaku dan Anggaran Dasar Bank. Piagam ini berfungsi sebagai pedoman dasar bagi Komite Pemantau Risiko untuk melaksanakan tugas dan tanggung jawabnya. Pokok-pokok pada Piagam Komite Pemantau Risiko, 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.

Committee Charter

Bank Sahabat Sampoerna has an updated Risk Monitoring Committee Charter, which was approved by the Board of Commissioners in February 2025 and drafted in accordance with applicable regulations and the Bank's Articles of Association. This Charter serves as a basic guideline for the Risk Monitoring Committee in performing its duties and responsibilities. The key provisions of the Risk Monitoring Committee Charter include:

1. *Purpose;*
2. *References;*
3. *General Functions and Roles;*
4. *Duties and Responsibilities;*
5. *Authority;*
6. *Structure and Membership;*
7. *Membership Requirements;*
8. *Term of Office;*
9. *Operating Mechanisms;*
10. *Working Hours;*
11. *Committee Meetings;*
12. *Meeting Decision-Making Mechanism;*
13. *Meeting Minutes;*
14. *Reporting; and*
15. *Conclusion.*

Komposisi dan Profil Komite

Di tahun 2025, komposisi Komite Pemantau Risiko tidak mengalami perubahan. Komite Pemantau Risiko Bank 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. Adapun komposisi Komite Audit di tahun 2025 adalah sebagai berikut:

Committee Composition and Profile

In 2025, the composition of the Risk Monitoring Committee remains unchanged. The Bank's Risk Monitoring Committee consists of 4 (four) members, comprising 1 (one) Chairperson who is an Independent Commissioner, 1 (one) Commissioner, and 2 (two) independent members, each of whom is an expert in finance and risk management. The composition of the Audit Committee in 2025 is as follows:

Nama *Name*	Jabatan *Position*	Dasar Pengangkatan *Basis of Appointment*	Periode Jabatan *Term of Office*
Khoe Minhari Handikusuma	Ketua *Chairman*	• 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 • *Board of Directors' Decree of PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 dated May 19, 2023* • *Board of Directors' Decree of PT Bank Sahabat Sampoerna No. Skep-005/BSS/DIR/V/2020 dated May 18, 2020* • *Board of Directors' Decree of PT Bank Sahabat Sampoerna No. Skep.004/BSS/DIR/VIII/2017 dated August 18, 2017*	2023-2026

Nama *Name*	Jabatan *Position*	Dasar Pengangkatan *Basis of Appointment*	Periode Jabatan *Term of Office*
Harry Mulyadi Santoso	Anggota *Member*	• 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 • *Board of Directors' Decree of PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 dated May 19, 2023* • *Board of Directors' Decree of PT Bank Sahabat Sampoerna No. Skep-005/BSS/DIR/V/2020 dated May 18, 2020* • *Board of Directors' Decree of PT Bank Sahabat Sampoerna No. Skep-001.a/BSS/DIR/II/2019 dated February 15, 2019*	2023-2026
Juwono Akuan Rokanta	Anggota *Member*	• 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 • *Board of Directors' Decree of PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 dated May 19, 2023* • *Board of Directors' Decree of PT Bank Sahabat Sampoerna No. Skep-005/BSS/DIR/V/2020 dated May 18, 2020* • *Memorandum on the Appointment of New Members and Replacement of Members of the Board of Commissioners' Advisory Committee No. 018/IM/KOM/BSS/V/2017 dated May 18, 2017*	2023-2026
Ikun M. Soedrajat	Anggota *Member*	Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 tanggal 19 Mei 2023. *Board of Directors' Decree of PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 dated May 19, 2023.*	2023-2026

Khoe Minhari Handikusuma

Ketua Komite Pemantau Risiko
Chairman of the Risk Monitoring 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 is available in the Board of Commissioners section of the Company Profile chapter in this Annual Report.

Harry Mulyadi Santoso

Anggota Komite Pemantau Risiko
Member of the Risk Monitoring 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 is available in the Board of Commissioners section of the Company Profile chapter in this Annual Report.

Juwono Akuan Rokanta

Anggota Komite Pemantau Risiko
Member of the Risk Monitoring 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 is available in the Audit Committee Composition and Profile section of the Corporate Governance chapter of this Annual Report.

Ikun M. Soedrajat

Anggota Komite Pemantau Risiko
Member of the Risk Monitoring Committee

Kewarganegaraan *Nationality*	**Usia** *Age*	**Domisili** *Domicile*
Indonesia *Indonesian*	63 Tahun *63 years old*	Jakarta, Indonesia

Dasar Hukum Pengangkatan *Legal Basis of Appointment*	2023-2026: Surat Keputusan Direksi PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 tanggal 19 Mei 2023	*2023–2026: Board of Directors' Decision of PT Bank Sahabat Sampoerna No. Skep-002/BSS/DIR/V/2023 dated May 19, 2023*
Riwayat Pendidikan *Educational Background*	• *Master of Management*, Universitas Gajah Mada, Yogyakarta (2023) • *Electricity Power Engineering*, Institut Teknologi Bandung, Bandung (1987)	• *Master of Management, Gadjah Mada University, Yogyakarta (2023)* • *Electrical Power Engineering, Bandung Institute of Technology, Bandung (1987)*
Keahlian *Expertise*	*Manajemen dan Perbankan*	*Management and Banking*
Sertifikasi Profesi *Professional Certification*	*Sertifikasi Manajemen Risiko Jenjang 7*	*Level 7 Risk Management Certification*
Riwayat Pekerjaan *Work History*	• *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* • *Financial Director at PT Dewata Freight International Tbk*
Rangkap Jabatan *Concurrent Position*	Tidak memiliki rangkap jabatan di perusahaan lain di luar Grup Sampoerna Strategic.	*Does not hold any concurrent positions at other companies outside the Sampoerna Strategic Group*
Hubungan Afiliasi *Affiliation*	Tidak memiliki hubungan keuangan, kepengurusan, dan kekeluargaan dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.	*Does not have any financial, managerial, or family ties with members of the Board of Commissioners, members of the Board of Directors, or major and controlling shareholders.*
Kepemilikan Saham *Share Ownership*	Tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic.	*Does not hold any shares in either Bank Sahabat Sampoerna or any other company affiliated with the Sampoerna Strategic Group.*

Tugas, Tanggung Jawab, dan Wewenang Komite

Berdasarkan Piagam Komite Pemantau Risiko, tugas dan tanggung jawab Komite Pemantau Risiko meliputi:

1. 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.
2. 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.

Duties, Responsibilities, and Authorities of the Committee

Based on the Risk Monitoring Committee Charter, the duties and responsibilities of the Risk Monitoring Committee include:

1. *Provide independent professional opinions to the Board of Commissioners regarding reports or matters submitted by the Board of Directors, and identify issues requiring the Board of Commissioners' attention regarding Bank Sahabat Sampoerna's risk management.*
2. *Evaluating the content of Bank Sahabat Sampoerna's risk management policies and assessing the alignment of such policies with their implementation to provide recommendations to the Board of Commissioners, at least once a year.*

3. Memantau dan mengevaluasi Satuan Kerja Manajemen Risiko dan pelaksanaan tugas-tugas komitenya dalam rangka memberikan rekomendasi tertulis kepada Dewan Komisaris.
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.

3. Monitoring and evaluating the Risk Management Unit and the performance of its committee duties in order to provide written recommendations to the Board of Commissioners.
4. Reporting various risks faced by Bank Sahabat Sampoerna to the Board of Commissioners and the implementation of risk management by the Board of Directors.
5. Evaluate the Board of Directors' accountability for the implementation of risk management policies at least once every three months.
6. Conduct or authorize investigations within its scope.
7. Have a duty to comply with the Bank Sahabat Sampoerna Code of Conduct.
8. Act independently in the performance of duties and responsibilities.
9. Maintain the confidentiality of Bank Sahabat Sampoerna's documents, data, and information.
10. Draft, review, and update the Risk Monitoring Committee Charter periodically.
11. Must continuously improve competencies through education and training.

Meanwhile, the authorities held by the Bank's Risk Monitoring Committee are as follows:
1. Accessing the necessary documents, data, and information of Bank Sahabat Sampoerna;
2. Communicating directly with employees, the Board of Directors, and other parties;
3. Engaging independent third parties to assist in the performance of duties, if necessary;
4. Exercising other authorities granted by the Board of Commissioners; and
5. Cooperating with the Risk Management Unit.

Committee Independence

Members of the Risk Monitoring Committee are committed to prioritizing independence, acting objectively, and exercising due diligence in the performance of their duties and responsibilities. Furthermore, the committee consistently ensures that it has no conflicts of interest with other Bank bodies and does not accept interference from Shareholders. This commitment is reflected in the fulfillment of the following independence requirements.

Aspek Independensi *Aspects of Independence*	**Khoe Minhari** *Handikusuma*	**Harry Mulyadi Santoso**	**Juwono** *Akuan Rokanta*	**Ikun M.** *Soedrajat*
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. *Has no financial relationship with the Board of Commissioners and the Board of Directors.*	v	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. *Has no management relationship with Shareholders, Subsidiaries, or affiliated companies.*	v	v	v	v

Aspek Independensi *Aspects of Independence*	**Khoe Minhari** *Handikusuma*	**Harry Mulyadi Santoso**	**Juwono** *Akuan Rokanta*	**Ikun M.** *Soedrajat*
Tidak memiliki hubungan kepemilikan saham di Bank. *Has no shareholding relationship with the Bank.*	v	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Pemantau Risiko. *Has no family relationship with the Board of Commissioners, the Board of Directors, and/or fellow members of the Risk Monitoring Committee.*	v	v	v	v

v : Terpenuhi | *Fulfilled*
x : Tidak terpenuhi | *Not fulfilled*

Sertifikasi Profesi Anggota Komite

Dalam rangka memastikan seluruh anggota Komite Pemantau Risiko memiliki kualifikasi dan kompetensi yang memadai, Bank senantiasa memfasilitasi seluruh anggota Komite Pemantau Risiko untuk mengikuti program sertifikasi. Program ini juga bertujuan untuk menjaga dan meningkatkan pelaksanaan fungsi dan tugas Komite Pemantau Risiko agar dapat tetap berjalan optimal. Sertifikasi yang telah dimiliki oleh anggota Komite Pemantau Risiko Bank sampai dengan tahun 2025 adalah sebagai berikut:

Professional Certification of Committee Members

To ensure that all members of the Risk Monitoring Committee possess adequate qualifications and competencies, the Bank consistently facilitates all members of the Risk Monitoring Committee to participate in certification programs. These programs also aim to maintain and enhance the performance of the Risk Monitoring Committee's functions and duties so that they continue to operate optimally. The certifications held by members of the Bank's Risk Monitoring Committee as of 2025 are as follows:

No.	**Sertifikasi** *Certification*	**Jumlah (orang)** *Total (persons)*
1.	Sertifikasi Manajemen Risiko Jenjang 7 *Level 7 Risk Management Certification*	3
2.	Sertifikasi Manajemen Risiko Jenjang 6 *Level 6 Risk Management Certification*	1
3.	Training Certified Audit Committee Practice (CACP)	2

Pelaksanaan Rapat Komite

Komite Pemantau Risiko wajib melaksanakan rapat internal minimal 1 (satu) kali dalam 1 (satu) bulan. Sepanjang tahun 2025, Komite Pemantau Risiko telah melaksanakan rapat sebanyak 12 (dua belas) kali, secara daring dan luring. Frekuensi kehadiran dan agenda rapat Komite Pemantau Risiko yang dilakukan sepanjang tahun 2025 adalah sebagai berikut:

Risk Monitoring Committee Meetings

The Risk Monitoring Committee is required to hold internal meetings at least once a month. Throughout 2025, the Risk Monitoring Committee held 12 (twelve) meetings, both online and in person. The attendance rates and meeting agendas of the Risk Monitoring Committee throughout 2025 are as follows:

Nama *Name*	**Jabatan** *Position*	**Total Rapat** *Position*	**Kehadiran** *Attendance*	**Persentase (%)** *Percentage (%)*
Khoe Minhari Handikusuma	Ketua *Chairman*	12	12	100%
Harry Mulyadi Santoso	Anggota *Member*	12	7	58%
Juwono Akuan Rokanta	Anggota *Member*	12	12	100%
Ikun M. Soedrajat	Anggota *Member*	12	12	100%
Rata-Rata *Average*				89,5%

No.	Tanggal *Date*	Agenda	Kehadiran *Attendance*			
			KMH	HMS	JAR	IMS
1.	21 Januari 2025 *January 21, 2025*	• *Account Profitabitability* Julo (*follow up last mont* KPR) • *Update* temuan OJK (Pemenuhan dan *action plan)* • *Rescovery Plan Update* – OJK • *Portfolio Update as of* Desember 2024 • *Julo Profitability Account (follow-up on last month's mortgage)* • *Update on OJK Findings (Compliance and Action Plan)* • *Recovery Plan Update – OJK* • *Portfolio Update as of December 2024*	v	x	v	v
2.	25 Februari 2025 *February 25, 2025*	• *Update Regulation* Q4 – 2024 • Risiko Likuiditas BSS – Strategi Pengelolaan Likuiditas 2025 • *Portfolio Update as of* Januari 2025 beserta *Action Plan* Perbaikan *Credit Initiation* • *Update to Regulation Q4 – 2024* • *BSS Liquidity Risk – 2025 Liquidity Management Strategy* • *Portfolio Update as of January 2025 and Action Plan for Credit Initiation Improvements*	v	x	v	v
3.	21 Maret 2025 *March 21, 2025*	• *Update* APU PPT • *Update* EWS FI Q4 – 2024 • Pemenuhan *Concern* OJK – Implementasi Kebijakan Kredit yang Lebih Disiplin • *Portfolio Update as of February* 2025 • *Update on AML-CTF* • *Update on EWS FI Q4 – 2024* • *Compliance with OJK Guidelines – Implementation of More Disciplined Credit Policies* • *Portfolio Update as of February 2025*	v	v	v	v
4.	25 April 2025 *April 25, 2025*	• *Update* Kantor Fungsional (KF) BSS, meliputi, bisnis *performance, control & monitoring, people capacity & competency* dan rencana pembukaan di tahun 2025 • *Update* Implementasi *Climate Risk Management & Scenario Analysis* • *Review* KUMR Tahun 2025 • *Portfolio Update as of March* 2025 • *Update on the BSS Functional Office (KF), covering business performance, control & monitoring, people capacity & competency, and plans for opening in 2025* • *Update on the Implementation of Climate Risk Management & Scenario Analysis* • *Review of the 2025 KUMR* • *Portfolio Update as of March 2025*	v	v	v	v
5.	23 Mei 2025 *May 23, 2025*	• *Wholesale Business – Strategies & Portfolio Update* • Pelaksanaan Strategi *Anti Fraud* 2025 • *Stress Test Update* • *Portfolio Update as of* April 2025 • *Wholesale Business – Strategies & Portfolio Update* • *Implementation of the 2025 Anti-Fraud Strategy* • *Stress Test Update* • *Portfolio Update as of April 2025*	v	v	v	v
6.	17 Juni 2025 *June 17, 2025*	• *Fintech Portfolio Update and Strategy* • *Regulation* & APU PPT *Update* • *Portfolio Update as of* Mei 2025\ • *Fintech Portfolio Update and Strategy* • *Regulation & APU PPT Update* • *Portfolio Update as of May 2025*	v	x	v	v
7.	22 Juli 2025 *July 22, 2025*	• ESME *Update* • SME & ESME *Performance by Vintage* termasuk *Settlement and Recovery Trend* • *Portfolio Update as of* Juni 2025 • *ESME Update* • *SME & ESME Performance by Vintage, including Settlement and Recovery Trends* • *Portfolio Update as of June 2025*	v	v	v	v

No.	Tanggal *Date*	Agenda	Kehadiran *Attendance*			
			KMH	HMS	JAR	IMS
8.	19 Agustus 2025 *August 19, 2025*	• *Update* Pelaporan *Climate Risk Management & Scenario Analysis* Perbankan (CRMS) kepada OJK • Penanganan dan Penguatan Manajemen Risiko Likuiditas • *Cap Limit Product* dan *Segment* beserta *Review Risk Appetite Statement* (RAS) Tahun 2025] • *Portfolio Update as of July* 2025 • *Update on Reporting of Climate Risk Management & Scenario Analysis in Banking (CRMS) to the OJK* • *Liquidity Risk Management and Strengthening* • *Product and Segment Cap Limits along with Review of the 2025 Risk Appetite Statement (RAS)* • *Portfolio Update as of July 2025*	v	x	v	v
9.	23 September 2025 *September 23, 2025*	• ESME *Portfolio Grading Analysis as of* Agustus 2025 • *Regular Portfolio Update as of* Agustus 2025 • *ESME Portfolio Grading Analysis as of August 2025* • *Regular Portfolio Update as of August 2025*	v	x	v	v
10.	21 Oktober 2025 *October 21, 2025*	• *Update* Regulasi & APU PPT Q3 2025 • *Updae* Pelaporan *Recovery Plan* BSS 2025 • EDV *Portfolio Update & Action Plan* • *Regular Portfolio Update as of September 2025* • *Regulatory & APU PPT Update Q3 2025* • *BSS 2025 Recovery Plan Reporting Update* • *EDV Portfolio Update & Action Plan* • *Regular Portfolio Update as of September 2025*	v	v	v	v
11.	18 November 2025 *November 18, 2025*	• FI (Through The Partner) Business - Strategics & Portfolio Update • Evaluasi Portfolio Pembiayaan melalui Agen • Regular Portfolio Update as of Oktober 2025 • *FI (Through The Partner) Business - Strategy & Portfolio Update* • *Evaluation of Financing Portfolio through Agents* • *Regular Portfolio Update as of October 2025*	v	v	v	v
12.	18 Desember 2025 *December 18, 2025*	• Pemaparan Rencana Penanganan Kredit Bermasalah, termasuk Rencana Recovery dan Identifikasi AYDA • Penanganan Restruktur Berulang AS • Evaluasi dan penjelasan terkait CKPN yang turun termasuk Pembentukan CKPN pada Debitur Restruktur • Regular Portfolio Update as of November 2025 MHL • *Presentation of the Plan for Handling Non-Performing Loans, including the Recovery Plan and Identification of AYDA* • *Handling of Repeated Restructuring in the US* • *Evaluation and explanation regarding the decline in CKPN, including the Formation of CKPN for Restructured Debtors* • *Regular Portfolio Update as of November 2025 MHL*	v	v	v	v

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

Pengembangan Kompetensi

Untuk menunjang Komite Pemantau Risiko dalam melaksanakan tugas dan tanggung jawabnya, Bank Sahabat Sampoerna memberikan kesempatan kepada anggota Komite Pemantau Risiko untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal maupun pihak eksternal. Adapun program pengembangan kompetensi yang diikuti oleh Komite Pemantau Risiko di tahun 2025 adalah sebagai berikut:

Competency Development

To support the Risk Monitoring Committee in carrying out its duties and responsibilities, Bank Sahabat Sampoerna provides members of the Risk Monitoring Committee with the opportunity to participate in training and competency development programs, whether organized internally or by external parties. The competency development programs attended by the Risk Monitoring Committee in 2025 are as follows:

Nama *Name*	**Jabatan** *Position*	**Topik Pelatihan** *Training Topic*	**Penyelenggara** *Organizer*	**Tanggal Pelatihan** *Training Date*
Khoe Minhari Handikusuma	Ketua *Chairman*	Sertifikasi Manajemen Risiko *Risk Management Certification*	Garda	Juli 2025 *July 2025*
Harry Mulyadi Santoso	Anggota *Member*	Sertifikasi Manajemen Risiko *Risk Management Certification*	Garda	Juli 2025 *July 2025*
Juwono Akuan Rokanta	Anggota *Member*	• Sertifikasi Manajemen Risiko • Training Certified Audit Committee Practice • *Risk Management Certification* • *Certified Audit Committee Practice Training*	• Garda • IKAI	• Juli 2025 • Mei 2025 • *July 2025* • *May 2025*
Ikun M. Soedrajat	Anggota *Member*	• Sertifikasi Manajemen Risiko • Training Certified Audit Committee Practice • *Risk Management Certification* • *Certified Audit Committee Practice Training*	• Garda • IKAI	• Juli 2025 • Mei 2025 • *July 2025* • *May 2025*

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.

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.

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

The process for the appointment and dismissal of the Chair of the Bank's Risk Monitoring Committee is based on the Bank's Board of Directors' Decision regarding the Appointment of Risk Monitoring Committee Members, and is guided by the Board of Commissioners' Internal Memorandum regarding the Appointment of New Members and the Replacement of Members of the Board of Commissioners' Advisory Committee.

The individual appointed as chair of this committee is an Independent Commissioner who meets the applicable qualifications and criteria. The term of office for the Chair of the Risk Monitoring Committee is set at two years or more, but shall not exceed the term of office of the members of the Board of Commissioners. Meanwhile, the reappointment of the Chair of the Risk Monitoring Committee is determined based on the assessment results of the Board of Commissioners.

Remunerasi

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

Remuneration

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

Pelaksanaan Tugas Komite di Tahun 2025

Sepanjang tahun 2025, Komite Pemantau Risiko melaksanakan tugas dan tanggung jawabnya melalui pelaksanaan sejumlah program kerja, antara lain:

Committee Activities in 2025

Throughout 2025, the Risk Monitoring Committee conducted its duties and responsibilities through the implementation of a number of work programs, including:

Program Kerja *Work Programs*	**Pelaksanaan** *Implementation*
Memantau dan mengevaluasi tugas Satuan Kerja Manajemen Risiko *Monitoring and evaluating the tasks of the Risk Management*	• 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 report early warning system pada debitur segmen bisnis Financial Institution (FI). • *Monitoring the implementation of the Bank's risk management based on an assessment of the Bank's overall risk level.* • *Discussing the monitoring of the Bank's risk appetite statement and credit limit parameters.* • *Discussing the results of monitoring the early warning system reports on borrowers in the Financial Institution (FI) business segment.*
Mengevaluasi kebijakan manajemen risiko Bank dan kesesuaian kebijakan manajemen risiko dengan pelaksanaannya *Monitoring and evaluating the tasks of the Risk Management*	Mendiskusikan dan mengevaluasi penerapan kebijakan perkreditan Bank sesuai dengan pelaksanaannya. *Discussing and evaluating the implementation of the Bank's credit policies in accordance with their implementation.*
Melaporkan kepada Dewan Komisaris berbagai risiko yang dihadapi oleh Bank dan penerapan manajemen risiko oleh Direksi. *Reporting to the Board of Commissioners on various risks faced by the Bank and the implementation of risk management by the Board of Directors.*	• 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. • *Discussing the performance of the Bank's loan portfolio in accordance with the Bank's business segments.* • *Discussing the assessment of the Bank's overall risk level based on the assessment of 8 types of risk.*

Rekomendasi

Berdasarkan pelaksanaan tugas sepanjang tahun 2025, 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 performance of its duties throughout 2025, the Risk Monitoring Committee has issued a number of recommendations in accordance with its functions. These recommendations are in line with the committee's authority to access necessary documents, data, and information from Bank Sahabat Sampoerna; to engage independent third parties to assist in the performance of its duties (if necessary); and to collaborate with the Risk Management Unit.

Organ Pendukung Direksi

Supporting Bodies to the Board of Directors

Bank Sahabat Sampoerna memiliki organ pendukung yang dapat membantu memaksimalkan pelaksanaan tugas dan tanggung jawab Direksi dalam mengelola Bank. Organ pendukung Direksi Bank Sahabat Sampoerna terdiri dari Komite 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.

Bank Sahabat Sampoerna has supporting bodies that assist the Board of Directors in effectively fulfilling its duties and responsibilities in managing the Bank. The supporting bodies of Bank Sahabat Sampoerna's Board of Directors consist of the Management and Risk, the Credit Policy Committee, the Assets Liability Committee (ALCO), the Information Technology Steering Committee, the Operational Risk Management Committee, the Product Committee, and the Credit Committee. Information regarding each of the Board's supporting bodies is outlined below.

Komite Manajemen Risiko

Risk Management Committee

Komite Manajemen Risiko merupakan organ pendukung Direksi yang berfungsi untuk mendukung upaya pengendalian risiko Bank terhadap potensi kerugian yang timbul dari aktivitas operasional. Selain itu, Komite Manajemen Risiko bertanggung jawab untuk memastikan bahwa tingkat risiko yang dihadapi Bank berada dalam batas risk appetite yang telah ditetapkan oleh manajemen Bank.

The Risk Management Committee is a supporting body of the Board of Directors that serves to support the Bank's risk control efforts against potential losses arising from operational activities. In addition, the Risk Management Committee is responsible for ensuring that the level of risk faced by the Bank remains within the risk appetite limits established by the Bank's management.

Piagam Komite

Committee Charter

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

Risk Management Committee carries out its duties and responsibilities in accordance with the General Risk Management Policy and the Internal Memo regarding the Reorganization of Bank Sahabat Sampoerna's Risk Management Committee.

Tugas, Tanggung Jawab, dan Wewenang Komite

Duties, Responsibilities, and Authorities of the Committee

Komite Manajemen Risiko memiliki tugas dan tanggung jawab untuk 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

The Risk Management Committee is tasked with and responsible for providing recommendations to the President Director regarding the following matters:

1. *The formulation of risk management policies and their amendments, including risk management strategies, risk appetite and risk tolerance levels, the risk management framework, and contingency plans to anticipate the occurrence of abnormal conditions.*
2. *Periodic or ad hoc improvements to the risk management process resulting from 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. *The adoption of policies and/or business decisions that deviate from standard procedures, such as significant business expansion that exceeds the Bank's previously*

Rencana Bisnis Bank yang telah ditetapkan sebelumnya atau pengambilan posisi/eksposur risiko yang melampaui limit yang telah ditetapkan.

established Business Plan or the assumption of risk positions/exposures that exceed established limits.

Kedudukan Komite

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

Position of the Risk Management Committee

Structurally, the Risk Management Committee reports to the Compliance & Risk Director. Thus, the Risk Management Committee is responsible for performing its duties directly to the President Director.

Komposisi dan Profil Komite

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

Committee Composition and Profile

The composition of the Risk Management Committee has been established pursuant to Board of Directors Decision No. Skep-011/BSS/DIR/XI/2023 regarding the Appointment of Risk Management Committee Members. The structure and composition of the Risk Management Committee are as follows:

Ketua (Merangkap Anggota Tetap) *Chairman (concurrently as a Permanent Member)*	Direktur Kepatuhan & Manajemen Risiko *Compliance & Risk Director*
Koordinator (Anggota Tetap) *Coordinator (Permanent Member)*	Kepala *Enterprise Risk*, Analytics & *Control* *Enterprise Risk, Analytics & Control Head*
Anggota Tetap *Permanent Members*	• Direktur Utama *President Director* • Direktur Teknologi *Informasi Information Technology Director* • Direktur Bisnis UMKM MSME *Business Director* • Direktur Keuangan & Perencanaan Bisnis *Financial and Business Planning Director* • *President Director* • *Information Technology Director* • *MSME Business Director* • *Finance & Business Planning Director*
Anggota Tidak Tetap *Non-Permanent Members*	Kepala Divisi *Division Head*

*) *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. | *The Chief Internal Auditor serves as a permanent member, acting in this capacity as an independent party capable of providing input on the implementation of the Bank's risk management. This body does not function as an approving authority (with voting rights) regarding risk management policies to be established and implemented at 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.

The profiles of the Risk Management Committee members are disclosed in the Executive Officer Profiles and the Profile of the Head of the Risk Management Unit within 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 independence, acting objectively, and exercising due diligence in the performance of their duties and responsibilities. In addition, the committee consistently ensures that it has no conflicts of interest with other Bank bodies and does not accept interference from Shareholders. This commitment is reflected in the fulfillment of the following aspects of independence:

Aspek Independensi *Aspects of Independence*	**Ketua (Merangkap Anggota Tetap)** *(Concurrently as Permanent Member)*	**Koordinator (Anggota Tetap)** *Coordinator (Permanent Member)*	**Anggota Tetap** *Permanent Member*	**Anggota Tidak Tetap** *Non-Permanent Member*
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. *Has no financial relationship with the Board of Commissioners and the Board of Directors.*	v	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. *Has no management relationship with Shareholders, Subsidiaries, or affiliated companies.*	v	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. *Has no shareholding relationship with the Bank.*	v	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Manajemen Risiko *Has no family relationship with the Board of Commissioners, the Board of Directors, and/or fellow members of the Risk Management Committee*	v	v	v	v

v : Terpenuhi | *Fulfilled*
x : Tidak terpenuhi | *Not fulfilled*

Pelaksanaan Tugas Komite di Tahun 2025

Sepanjang tahun 2025, Komite Manajemen Risiko telah melaksanakan tugas dan tanggung jawabnya melalui program kerja strategis, antara lain:

Committee Activities in 2025

Throughout 2025, the Risk Management Committee has implemented its duties and responsibilities through strategic work programs, including:

Program Kerja *Work Programs*	**Pelaksanaan** *Implementation*
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. *Evaluating and providing recommendations on the development of risk management policies, including risk management strategies, risk appetite and risk tolerance, risk management frameworks, and contingency plans to anticipate the occurrence of abnormal conditions*	• 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. • *Discuss and evaluate the Bank's overall risk level assessment based on the assessment of 8 types of risk.* • *Discuss and evaluate the implementation of monitoring of the Bank's Risk Appetite Statement (RAS) limits and Credit Parameter limits.*
Mengevaluasi penyempurnaan proses manajemen risiko secara berkala maupun bersifat insidental sebagai akibat dari suatu perubahan kondisi eksternal dan internal Bank. *Evaluating improvements to the risk management process on a regular basis or as needed in response to changes in the Bank's external and internal conditions.*	Memantau pelaksanaan penerapan manajemen risiko Bank berdasarkan penilaian tingkat risiko Bank secara keseluruhan. *Monitor the implementation of the Bank's risk management based on the Bank's overall risk assessment*
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. *Evaluating and providing recommendations on the development of risk management policies, including risk management strategies, risk appetite and risk tolerance, risk management frameworks, and contingency plans to anticipate the occurrence of abnormal conditions*	• 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. • *Discuss and evaluate the Bank's overall risk assessment based on the assessment of eight types of risk.* • *Discuss and evaluate the implementation of monitoring regarding the limits set forth in the Risk Appetite Statement (RAS) and the Bank's credit limit parameters.*

Rekomendasi

Komite Manajemen Risiko telah memberikan rekomendasi mengenai pengelolaan dan mitigasi risiko di internal Bank, sebagaimana tercatat dalam Notulen Rapat Komite Manajemen Risiko tahun 2025.

Recommendations

The Risk Management Committee has provided recommendations regarding risk management and mitigation within the Bank, as recorded in the Minutes of the 2025 Risk Management Committee Meeting.

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 2025, Komite Manajemen Risiko telah melaksanakan rapat sebanyak 3 (tiga) kali. Adapun rincian pelaksanaan dan agenda rapat Komite Manajemen Risiko di tahun 2025 dapat dilihat sebagai berikut:

Risk Management Committee Meetings

The Risk Management Committee may hold internal meetings at least once every three months or may convene at any time as deemed necessary by the Bank. Throughout 2025, the Risk Management Committee held 3 (three) meetings. The details regarding the meetings and agendas of the Risk Management Committee in 2025 are as follows:

Tanggal *Date*	**Agenda**
17 Maret 2025 *March 17, 2025*	• *Regulatory Update* • *Recovery Plan Update* • *Review* RAS & KUMR • Pelaporan SKMR • Profil Risiko, RAS, BMPK, & RPIM • ATMR & KPMM • *Regulatory Update* • *Recovery Plan Update* • *RAS & KUMR Review* • *SKMR Reporting* • *Risk Profile, RAS, LLL, & RPIM* • *RWA & CAR*
28 Juli 2025 *July 28, 2025*	• Profil Risiko • *Risk Appetite Statement* (RAS) • Diskusi & Rekomendasi • *Risk Profile* • *Risk Appetite Statement (RAS)* • *Discussion & Recommendations*
20 Oktober 2025 *October 20, 2025*	• Profil RIsiko • *Risk Appetite Statement* (RAS) • *Recovery Plan* 2025 • *Risk Profile* • *Risk Appetite Statement (RAS)* • *2025 Recovery Plan*

Pengembangan Kompetensi

Untuk menunjang Komite Manajemen Risiko dalam melaksanakan tugas dan tanggung jawabnya, Bank Sahabat Sampoerna memberikan kesempatan kepada seluruh anggota Komite untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal maupun pihak eksternal. Adapun program pengembangan kompetensi yang diikuti oleh Komite Manajemen Risiko selama tahun 2025 adalah sebagai berikut:

Competency Development

To support the Risk Management Committee in performing its duties and responsibilities, Bank Sahabat Sampoerna provides all Committee members with the opportunity to participate in competency training and development programs— —conducted by both internal and external parties. The competency development programs attended by the Risk Management Committee during 2025 are as follows:

Topik Pelatihan *Training Topics*	**Penyelenggara** *Organizer*	**Tanggal Pelatihan** *Training Date*
Sertifikasi Manajemen Risiko Jenjang 7 *Level 7 Risk Management Certification*	Garda	Juli 2025 *July 2025*
Sertifikasi Manajemen Risiko Jenjang 5 *Level 5 Risk Management Certification*	Garda	Juli 2025 *July 2025*
"ACTION-POWERED FROM WITHIN: Leveraging Inner Strength for a High Energy result	Bank Sahabat Sampoerna	October 2025 *October 2025*

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 for the Appointment and Dismissal of Committee Members

The appointment and dismissal of the Bank's Risk Management Committee are governed by the Bank's Board of Directors' Decision on the Appointment of Risk Management Committee Members and guided by the Internal Memorandum on the Reorganization of the Risk Management Committee of Bank Sahabat Sampoerna.

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.

Credit Policy Committee

Bank Sahabat Sampoerna has established a Credit Policy Committee to assist the Board of Directors in determining credit policies, including the management of credit disbursement, the size of the credit portfolio to be managed, and strategies for achieving these objectives. The establishment of the Credit Policy Committee is in accordance with POJK No. 42/POJK.03/2017 dated July 12, 2017, regarding the Obligation to Formulate and Implement Credit or Financing Policies for Commercial Banks.

Piagam Komite

Bank telah memiliki pedoman kerja bagi Komite Kebijakan Perkreditan sebagai acuan dalam menjalankan tugas dan tanggung jawabnya. Pedoman tersebut mengacu kepada Memo No. 09/248a/MI/CP/I/2020 perihal Pedoman Pemberian Kredit (PPK) 2020 beserta perubahannya.

Committee Charter

The Bank has established operational guidelines for the Credit Policy Committee to serve as a reference in performing its duties and responsibilities. These guidelines are based on Memo No. 09/248a/MI/CP/I/2020 regarding the 2020 Credit Granting Guidelines (PPK) and its amendments.

Tugas, Tanggung Jawab, dan Wewenang Komite

Komite Kebijakan Perkreditan memiliki tugas dan tanggung jawab 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;

Duties, Responsibilities, and Authorities of the Committee

The Credit Policy Committee has the following duties and responsibilities:

1. *Functions of the Credit Policy Committee*
   a. *Provide input to the Board of Directors in the formulation of the Bank's Credit Policy, particularly regarding the formulation of prudential principles in lending or financing;*
   b. *Ensure that the Bank's Credit Policy is implemented and enforced consistently and thoroughly, and develop solutions in the event of obstacles or challenges in the implementation of the Bank's Credit Policy;*
   c. *Conduct periodic reviews of the Bank's Credit Policy and providing recommendations to the Board of Directors regarding necessary changes or improvements to the policy;*
   d. *Monitor and evaluate:*
      - *The development and quality of the overall credit portfolio;*
      - *The proper exercise of credit approval authority;*
      - *The correctness of the process of granting, developing, and the quality of credit provided to parties related to the Bank as well as certain large debtors;*

- 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, 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 dimaksud 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.

- *Compliance with the provisions regarding maximum credit limits;*
- *Compliance with laws, regulations, and other relevant provisions in the execution of credit granting;*
- *Resolution of non-performing loans in accordance with the Bank's Credit Policy;*
- *The Bank's efforts to ensure adequate loan loss provisions; and*

e. The Head of the Internal Audit Unit, as a permanent member, serves as an independent party providing input on the Bank's Credit Policy. In this regard, the Internal Audit Unit does not function as the approving authority for credit policies to be established and implemented at the Bank.

2. Responsibilities of the Credit Policy Committee
   a. Submit periodic written reports to the Board of Directors, with copies to the Board of Commissioners, regarding:
      - *The results of monitoring the implementation and execution of the Bank's Credit Policy;*
      - *The results of monitoring and evaluation regarding the matters referred to in point 1.d above; and*
   b. Providing recommendations for corrective measures to the Board of Directors, with copies to the Board of Commissioners, regarding matters related to item 2.a above.

Kedudukan Komite

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

Position of Credit Policy Committee

Structurally, the Credit Policy Committee reports directly to the President Director. Therefore, the Credit Policy Committee is responsible for coordinating and submitting its Performance Report directly to the Bank's Board of Directors.

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, yakni sebagai berikut:

Committee Composition and Profile

The membership composition of the Credit Policy Committee has been disclosed in the 2020 Credit Granting Guidelines (PPK) Chapter X Credit Management Organization and has been aligned with the job title standards at the Board of Management level based on the Bankwide Organizational Update, as follows:

Ketua (Merangkap Anggota Tetap) *Chairman (concurrently as a Permanent Member)*	Direktur Utama *President Director*
Anggota Tetap*) *Permanent Members*)*	• Direktur Kepatuhan & Manajemen Risiko • Kepala *Enterprise Risk, Analytics & Control* • Kepala Divisi Satuan Kerja Kepatuhan/Compliance • ESME *Credit Division Head***) • SME & FI *Credit Division Head***) • *Chief Internal Auditor* • *Compliance & Risk Director* • *Head of Enterprise Risk, Analytics & Control* • *Head of the Compliance Division* • *Head of the SME Credit Division***) • *Head of SME & FI Credit Division***) • *Chief Internal Auditor*

Anggota Tidak Tetap*) *Permanent Members*)*	• *Chief of ESME Credit* **) • Kepala Keuangan & Perencanaan Bisnis (*Finance & Business Planning*) • Kepala Divisi Institusi Keuangan (*Financial Institution*) • Kepala Pengembangan Produk Pembiayaan (*Product Development*) • *Chief of ESME Credit* **) • *Head of Finance & Business Planning* • *Head of Financial Institutions Division* • *Head of Financing Product Development*

*) Setelah berlakunya Surat Keputusan ini, baik anggota tetap (kecuali Kepala Satuan Kerja Audit Internal (SKAI)/ Internal Audit) maupun anggota tidak tetap menandatangani kebijakan perkreditan yang terkait dengan unit kerjanya saja. | *After this Decree takes effect, both permanent members (except for the Head of the Internal Audit Unit (SKAI)/Internal Audit) and non-permanent members shall sign only the credit policies related to their respective units.*
**) Disesuaikan dengan segmen bisnis | *Adjusted according to business segment*

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.

The profiles of the members of the Credit Policy Committee are included in the Executive Officer Profiles, the Compliance Unit Head Profile, and the Risk Management Unit Head Profile in this Annual Report.

Independensi

Independence

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 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.

Members of the Credit Policy Committee are committed to prioritizing independence, acting objectively, and exercising due diligence in the performance of their duties and responsibilities. Furthermore, the committee consistently ensures it has no conflicts of interest with other Bank bodies and does not accept interference from Shareholders. This commitment is reflected in the fulfillment of the following independence requirements.

Aspek Independensi *Aspects of Independence*	**Ketua (Merangkap Anggota Tetap)** *Chairman (concurrently as Permanent Member)*	**Wakil Ketua (Merangkap Anggota)** *Vice Chairman (Concurrently as Member)*	**Sekretaris (Merangkap Anggota)** *Secretary (Concurrently as Member)*	**Anggota Tetap** *Permanent Member*
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. *Has no financial relationship with the Board of Commissioners and the Board of Directors.*	v	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. *Has no management relationship with Shareholders, Subsidiaries, or affiliated companies.*	v	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. *Has no shareholding relationship with the Bank.*	v	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Manajemen Risiko *Has no family relationship with the Board of Commissioners, the Board of Directors, and/or fellow members of the Risk Management Committee.*	v	v	v	v

v : Terpenuhi | *Fulfilled*
x : Tidak terpenuhi | *Not fulfilled*

Pelaksanaan Tugas Komite di Tahun 2025

Committee Task Implementation in 2025

Sepanjang tahun 2025, Komite Kebijakan Perkreditan melaksanakan tugas dan tanggung jawabnya, sebagaimana tabel berikut:

Throughout 2025, the Credit Policy Committee implemented its duties and responsibilities as outlined in the following table:

Program Kerja *Work Program*	**Pelaksanaan** *Work Program*
Pelaksanaan Review ketentuan pemberian kredit, sehingga dalam kondisi terupdated regulasi yang berlaku dan relevan dengan kondisi internal appetite BSS *Implementation Review of credit granting provisions to ensure they are updated in accordance with applicable regulations and aligned with BSS's internal risk appetite*	Pelaksanaan review ketentuan kredit sepanjang tahun 2025 dilakukan terhadap: • Kebijakan Segmen Kredit • Ketentuan pembiayaan Wholesale • Perubahan Ketentuan FI dan Rintisan • Perubahan Ketentan SOP dan KMG Probiz_2025 • Penyempurnaan JUKLAK Pemantauan Probiz • Reviu Framework BWMK • Ketentuan Perlindungan Data Pribadi (PDP) • Ketentuan Perubahan Kredit • Juklak Pendistribusian Surat Kuasa penandatanganan dokumen PK • Ketentuan Penanganan Account Restruktur *The review of credit provisions throughout 2025 was conducted on:* • *Credit Segment Policies* • *Wholesale Financing Regulations* • *Changes to FI and Pilot Program Provisions* • *Changes to SOP and KMG Probiz_2025 Regulations* • *Improvements to the Probiz Monitoring Implementation Guidelines* • *Review of the BWMK Framework* • *Personal Data Protection (PDP) Regulations* • *Credit Change Regulations* • *Implementation Guidelines for the Distribution of Powers of Attorney for Signing PK Documents* • *Provisions for Handling Restructured Accounts*
Pelaksanaan Sosialisasi hasil review ketentuan pemberian kredit yang diberlakukan internal bank, kepada unit kerja terkait proses *Conducting outreach on the results of the review of internal credit granting policies to departments involved in the process*	Pelaksanaan Sosialisasi kepada unit kerja terkait proses, dari hasil review ketentuan pemberian kredit yang dilakukan sepanjang tahun 2025, untuk di efektifkan diinternal bank pada periode tahun 2025 *Conducting outreach on the results of the review of internal credit granting policies to departments involved in the process*

Pelaksanaan Rapat Komite

Sepanjang tahun 2025, Komite Kebijakan Perkreditan telah melaksanakan rapat sebanyak 3 (tiga) kali. Adapun rincian pelaksanaan dan agenda rapat Komite Kebijakan Perkreditan di tahun 2025 dapat dilihat sebagai berikut:

Credit Policy Committee Meetings

Throughout 2025, the Credit Policy Committee held three (3) meetings. The details of the Credit Policy Committee's meetings and agendas in 2025 are as follows:

Tanggal *Date*	**Agenda**
19 Maret 2025 *March 19, 2025*	• Update perubahan policy (Periode Januari – Maret 2025) • Inisiatif atau usulan terkait perubahan prosedur kredit sebagai pemenuhan concern OJK • Monitoring Deviasi kredit • *Update on policy changes (January–March 2025 period)* • *Initiatives or proposals regarding changes to credit procedures in response to OJK concerns* • *Monitoring of credit deviations*
30 Juli 2025 *July 30, 2025*	• Update perubahan prosedur kredit (periode April – Juli 2025) • Inisiatif atau usulan terkait perubahan prosedur kredit • Monitoring deviasi kredit • *Update on changes to credit procedures (April–July 2025)* • *Initiatives or proposals regarding changes to credit procedures* • *Credit deviation monitoring*
7 Oktober 2025 *October 7, 2025*	• Update perubahan policy (periode Agustus – September 2025) • Inisiatif atau usulan terkait perubahan prosedur kredit • *Update on policy changes (August–September 2025)* • *Initiatives or proposals regarding changes to credit procedures*

Rekomendasi

Berdasarkan pelaksanaan tugas sepanjang tahun 2025, Komite Kebijakan Perkreditan telah menyampaikan sejumlah rekomendasi terkait perumusan dan perbaikan kebijakan perkreditan, seperti:

1. Direkomendasikan untuk dilakukan perubahan ketentuan sesuai dengan ketentuan regulator dan perkembangan bisnis.
2. Probiz tipe II tetap dipasarkan dengan kondisi yang lebih konservatif berdasarkan CAP portofolio dan memenuhi threshold (yield – CoC) yang ditentukan.

Recommendations

Based on the performance of its duties throughout 2025, the Credit Policy Committee has submitted a number of recommendations regarding the formulation and improvement of credit policies, such as:

1. *It is recommended that provisions be amended in accordance with regulatory requirements and business developments.*
2. *Type II Probiz products continue to be marketed under more conservative conditions based on the portfolio's CAP and meet the specified (yield – CoC) threshold.*

Pengembangan Kompetensi

Untuk menunjang Komite Kebijakan Perkreditan dalam melaksanakan tugas dan tanggung jawabnya, Bank Sahabat Sampoerna memberikan kesempatan kepada anggota Komite untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal maupun pihak eksternal. Adapun program pengembangan kompetensi yang diikuti oleh Komite Kebijakan Perkreditan di tahun 2025 adalah sebagai berikut:

Competency Development

To support the Credit Policy Committee in performing its duties and responsibilities, Bank Sahabat Sampoerna provides Committee members with the opportunity to participate in training and competency development programs, whether organized internally or by external parties. The competency development programs participated in by the Credit Policy Committee in 2025 are as follows:

Topik Pelatihan *Training Topics*	Penyelenggara *Organizer*	Tanggal Pelatihan *Training Date*
Sertifikasi Manajemen Risiko *Risk Management Certification*	Garda	Juli 2025 *July 2025*
ACTION-POWERED FROM WITHIN: Leveraging Inner Strength for a High Energy result	Bank Sahabat Sampoerna	October 2025 *October 2025*
Credit Knowledge for Business	Bank Sahabat Sampoerna	Februari 2025 *February 2025*

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.

Mechanism for the Appointment and Dismissal of Committee Members

The process of appointing and dismissing members of the Bank's Credit Policy Committee is based on the Bank's Board of Directors' Decree on the Appointment of Credit Policy Committee Members and guided by the Internal Memorandum regarding the Reorganization of the Credit Policy Committee of Bank Sahabat Sampoerna.

ALCO

Bank Sahabat Sampoerna membentuk *Assets Liability Committee* (ALCO) sebagai salah satu organ penting perusahaan yang mendukung Direksi untuk bertanggung jawab atas pengelolaan aset dan liabilitas Bank, termasuk dalam penetapan *lending* dan *funding rate* yang sesuai. Selain itu, ALCO berperan dalam melakukan analisis terhadap pergerakan pasar finansial, *maturity gap*, arus kas, serta penyusunan strategi pengelolaan aset dan liabilitas, dengan mempertimbangkan dampaknya terhadap tingkat rentabilitas Bank, posisi devisa bersih, serta kondisi likuiditas Bank terhadap struktur pendanaan, dengan tetap memperhatikan faktor-faktor eksternal yang relevan.

ALCO

Bank Sahabat Sampoerna established an Assets and Liabilities Committee (ALCO) as one of the company's key bodies, supporting the Board of Directors in managing the Bank's assets and liabilities, including setting appropriate lending and funding rates. Additionally, the ALCO plays a role in analyzing financial market movements, maturity gaps, and cash flows, as well as formulating asset and liability management strategies, while considering their impact on the Bank's profitability, net foreign exchange position, and liquidity conditions relative to its funding structure, all while taking relevant external factors into account.

Piagam Komite

ALCO melaksanakan tugas dan tanggung jawabnya dengan berpedoman pada Kebijakan Khusus Tresuri.

Committee Charter

ALCO carries out its duties and responsibilities in accordance with the Special Treasury Policy.

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). Selain itu ALCO juga bertanggung jawab atas pengelolaan kelebihan dan/atau kekurangan kas serta pengelolaan cadangan likuiditas di pasar keuangan.

Committee Duties, Responsibilities, and Authorities

Based on the Special Treasury Policy, which serves as a working guideline, the ALCO has the duties and responsibilities to evaluate, monitor, and prepare forecasts (pro forma) of the Bank's future performance regarding the management of risks inherent in assets and liabilities. This arises due to an imbalance in the balance sheet (assets and liabilities) and/or an imbalance in cash flows (receipts and payments). Additionally, the ALCO is responsible for managing cash surpluses and/or shortfalls as well as managing liquidity reserves in the financial markets.

Kedudukan Komite

Secara struktural, kedudukan ALCO berada di bawah Direktur Utama. Oleh karena itu, ALCO bertanggung jawab secara langsung kepada Direktur Utama dalam melaksanakan tugas dan tanggung jawabnya selama tahun buku.

Position of ALCO Committee

Structurally, the ALCO reports to the President Director. Therefore, the ALCO is directly accountable to the President Director for the performance of its duties and responsibilities during the fiscal year.

Komposisi dan Profil Komite

Komposisi keanggotaan ALCO telah diatur dalam Kebijakan Khusus Tresuri BSS/KK-TRS/TRS/03 yang berlaku sejak Oktober 2022. Adapun komposisi ALCO di tahun 2025 adalah sebagai berikut:

Committee Composition and Profile

The composition of ALCO membership is regulated in Special Treasury Policy BSS/KK-TRS/TRS/03, effective as of October 2022. The composition of ALCO in 2025 is as follows:

Ketua (Merangkap Anggota Tetap) *Chairman (concurrently as a Permanent Member)*	Direktur Utama *President Director*
Wakil Ketua (Merangkap Anggota) *Vice Chairman (concurrently as a Member)*	Direktur yang membawahi *Treasury & International Banking* *Director in charge of Treasury & International Banking*
Sekretaris (Merangkap Anggota) *Secretary (concurrently as a Member)*	*Treasury & International Banking Head*

Anggota Tetap *Permanent Member*	• Direktur Kepatuhan & Manajemen Risiko • *Chief* SME, Funding, FI & *Network* • *Chief of Credit & Collection* • Direktur Bisnis Mikro • *Chief of Internal Audit* • *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* • *Compliance & Risk Director* • *Chief of SME, Funding, FI & Network* • *Chief of Credit & Collections* • *Micro Business Director* • *Chief of Internal Audit* • *Sales Management Division Head* • *Financial Institutions 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* • *Treasury & ALCO Manager Head*

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

The profiles of ALCO members are disclosed in the Executive Profiles section of the Company Profile chapter in this Annual Report.

Independensi

Independence

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.

ALCO members are committed to prioritizing independence, acting objectively, and exercising due diligence in the performance of their duties and responsibilities. Furthermore, the committee consistently ensures it has no conflicts of interest with other Bank bodies and does not accept interference from Shareholders. This commitment is reflected in the fulfillment of the following independence requirements.

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

v : Terpenuhi | *Fulfilled*
x : Tidak terpenuhi | *Not fulfilled*

Pelaksanaan Tugas Komite di Tahun 2025

Sepanjang tahun 2025, 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. Melakukan analisa kinerja Bank selama tahun 2025.
4. Menetapkan suku bunga simpanan dan kredit
5. Membuat perkiraan analisa kinerja Bank pada tahun 2026.

Committee Activities in 2025

Throughout 2025, ALCO has implemented its duties and responsibilities through a number of activities, such as:
1. *Holding regular monthly meetings.*
2. *Providing insights on the global and domestic economy to align business strategies.*
3. *Conducting an analysis of the Bank's performance for the year 2025.*
4. *Setting deposit and loan interest rates*
5. *Preparing a performance forecast for the Bank for the year 2026.*

Rekomendasi

Di tahun 2025, ALCO telah menyampaikan sejumlah rekomendasi, di antaranya:
1. Suku bunga Sampoerna Mobile Banking Time Deposit
2. Usulan peningkatan porsi DPK Individu, termasuk diantaranya pengurangan porsi dana dari Lembaga Jasa Keuangan seperti dari Aset Management, Sekuritas, Dana Pensiun, dll.
3. Penjagaan likuiditas menjelang hari libur panjang
4. Penurunan suku bunga DPK rupiah
5. Usulan suku bunga RAK yang akan berlaku pada tahun 2026

Recommendations

In 2025, the ALCO presented a number of recommendations, including:
1. *Interest rates for Sampoerna Mobile Banking Time Deposits*
2. *Proposal to increase the share of Individual Deposits, including reducing the share of funds from Financial Services Institutions such as Asset Management, Securities, Pension Funds, etc.*
3. *Maintaining liquidity ahead of long holidays*
4. *Reduction of rupiah DPK interest rates*
5. *Proposed RAK interest rates to take effect in 2026*

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 2025, ALCO telah melaksanakan rapat sebanyak 12 (dua belas) kali. Adapun rincian pelaksanaan dan agenda rapat Komite ALCO di tahun 2025 dapat dilihat sebagai berikut:

Committee Meeting

In accordance with the operating guidelines, the ALCO is required to hold meetings at least once a month or as needed, depending on the Bank's requirements. Throughout 2025, the ALCO held a total of 12 (twelve) meetings. The details of the ALCO Committee's meetings and agendas for 2025 are as follows:

Tanggal *Date*	Agenda
20 Januari 2025 *January 20, 2025*	• Tinjauan ekonomi/kebijakan ekonomi • Analisa kinerja keuangan Bank • Proyeksi likuiditas • Penetapan tingkat bunga DPK dan Kredit • Penetapan kewenangan persetujuan pemberian suku bunga DPK • Penetapan suku bunga RAK • *Economic review/economic policy* • *Analysis of the Bank's financial performance* • *Liquidity projections* • *Setting of DPK and Credit Interest Rates* • *Determination of approval authority for the setting of interest rates on third-party funds (DPK).* • *Setting of RAK interest rates*
17 Februari 2025 *February 17, 2025*	• Tinjauan ekonomi/kebijakan ekonomi • Analisa kinerja keuangan Bank • Proyeksi likuiditas • Penetapan tingkat bunga DPK dan Kredit • Penetapan kewenangan persetujuan pemberian suku bunga DPK • Penetapan suku bunga RAK • *Economic review/economic policy* • *Analysis of the Bank's financial performance* • *Liquidity projections* • *Setting of DPK and Credit Interest Rates* • *Determination of approval authority for the setting of interest rates on third-party funds (DPK).* • *Setting of RAK interest rates*

Tanggal *Date*	**Agenda**
17 Maret 2025 *March 17, 2025*	• Tinjauan ekonomi/kebijakan ekonomi • Analisa kinerja keuangan Bank • Proyeksi likuiditas • Penetapan tingkat bunga DPK dan Kredit • Penetapan kewenangan persetujuan pemberian suku bunga DPK • Penetapan suku bunga RAK • *Economic review/economic policy* • *Analysis of the Bank's financial performance* • *Liquidity projections* • *Setting of DPK and Credit Interest Rates* • *Determination of approval authority for the setting of interest rates on third-party funds (DPK).* • *Setting of RAK interest rates*
21 April 2025 *April 21, 2025*	• Tinjauan ekonomi/kebijakan ekonomi • Analisa kinerja keuangan Bank • Proyeksi likuiditas • Penetapan tingkat bunga DPK dan Kredit • Penetapan kewenangan persetujuan pemberian suku bunga DPK • Penetapan suku bunga RAK • *Economic review/economic policy* • *Analysis of the Bank's financial performance* • *Liquidity projections* • *Setting of DPK and Credit Interest Rates* • *Determination of approval authority for the setting of interest rates on third-party funds (DPK).* • *Setting of RAK interest rates*
19 Mei 2025 *May 19, 2025*	• Tinjauan ekonomi/kebijakan ekonomi • Analisa kinerja keuangan Bank • Proyeksi likuiditas • Penetapan tingkat bunga DPK dan Kredit • Penetapan kewenangan persetujuan pemberian suku bunga DPK • Penetapan suku bunga RAK • *Economic review/economic policy* • *Analysis of the Bank's financial performance* • *Liquidity projections* • *Setting of DPK and Credit Interest Rates* • *Determination of approval authority for the setting of interest rates on third-party funds (DPK).* • *Setting of RAK interest rates*
23 Juni 2026 *June 23, 2026*	• Tinjauan ekonomi/kebijakan ekonomi • Analisa kinerja keuangan Bank • Proyeksi likuiditas • Penetapan tingkat bunga DPK dan Kredit • Penetapan kewenangan persetujuan pemberian suku bunga DPK • Penetapan suku bunga RAK • *Economic review/economic policy* • *Analysis of the Bank's financial performance* • *Liquidity projections* • *Setting of DPK and Credit Interest Rates* • *Determination of approval authority for the setting of interest rates on third-party funds (DPK).* • *Setting of RAK interest rates*
21 Juli 2025 *July 21, 2025*	• Tinjauan ekonomi/kebijakan ekonomi • Analisa kinerja keuangan Bank • Proyeksi likuiditas • Penetapan tingkat bunga DPK dan Kredit • Penetapan kewenangan persetujuan pemberian suku bunga DPK • Penetapan suku bunga RAK • *Economic review/economic policy* • *Analysis of the Bank's financial performance* • *Liquidity projections* • *Setting of DPK and Credit Interest Rates* • *Determination of approval authority for the setting of interest rates on third-party funds (DPK).* • *Setting of RAK interest rates*
26 Agustus 2025 *August 26, 2025*	• Tinjauan ekonomi/kebijakan ekonomi • Analisa kinerja keuangan Bank • Proyeksi likuiditas • Penetapan tingkat bunga DPK dan Kredit • Penetapan kewenangan persetujuan pemberian suku bunga DPK • Penetapan suku bunga RAK • *Economic review/economic policy* • *Analysis of the Bank's financial performance* • *Liquidity projections* • *Setting of DPK and Credit Interest Rates* • *Determination of approval authority for the setting of interest rates on third-party funds (DPK).* • *Setting of RAK interest rates*

Tanggal *Date*	**Agenda**
22 September 2025 *September 22, 2025*	• Tinjauan ekonomi/kebijakan ekonomi • Analisa kinerja keuangan Bank • Proyeksi likuiditas • Penetapan tingkat bunga DPK dan Kredit • Penetapan kewenangan persetujuan pemberian suku bunga DPK • Penetapan suku bunga RAK • *Economic review/economic policy* • *Analysis of the Bank's financial performance* • *Liquidity projections* • *Setting of DPK and Credit Interest Rates* • *Determination of approval authority for the setting of interest rates on third-party funds (DPK).* • *Setting of RAK interest rates*
20 Oktober 2025 *October 20, 2025*	• Tinjauan ekonomi/kebijakan ekonomi • Analisa kinerja keuangan Bank • Proyeksi likuiditas • Penetapan tingkat bunga DPK dan Kredit • Penetapan kewenangan persetujuan pemberian suku bunga DPK • Penetapan suku bunga RAK • *Economic review/economic policy* • *Analysis of the Bank's financial performance* • *Liquidity projections* • *Setting of DPK and Credit Interest Rates* • *Determination of approval authority for the setting of interest rates on third-party funds (DPK).* • *Setting of RAK interest rates*
24 November 2025 *November 24, 2025*	• Tinjauan ekonomi/kebijakan ekonomi • Analisa kinerja keuangan Bank • Proyeksi likuiditas • Penetapan tingkat bunga DPK dan Kredit • Penetapan kewenangan persetujuan pemberian suku bunga DPK • Penetapan suku bunga RAK • *Economic review/economic policy* • *Analysis of the Bank's financial performance* • *Liquidity projections* • *Setting of DPK and Credit Interest Rates* • *Determination of approval authority for the setting of interest rates on third-party funds (DPK).* • *Setting of RAK interest rates*
15 Desember 2025 *December 15, 2025*	• Tinjauan ekonomi/kebijakan ekonomi • Analisa kinerja keuangan Bank • Proyeksi likuiditas • Penetapan tingkat bunga DPK dan Kredit • Penetapan kewenangan persetujuan pemberian suku bunga DPK • Penetapan suku bunga RAK • *Economic review/economic policy* • *Analysis of the Bank's financial performance* • *Liquidity projections* • *Setting of DPK and Credit Interest Rates* • *Determination of approval authority for the setting of interest rates on third-party funds (DPK).* • *Setting of RAK interest rates*

Pengembangan Kompetensi

Untuk menunjang ALCO dalam melaksanakan tugas dan tanggung jawabnya, Bank Sahabat Sampoerna memberikan kesempatan kepada anggota Komite untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal maupun pihak eksternal. Adapun program pengembangan kompetensi yang diikuti oleh ALCO di tahun 2025 adalah sebagai berikut:

Competency Development

To support the ALCO in carrying out its duties and responsibilities, Bank Sahabat Sampoerna provides Committee members with opportunities to participate in training and competency development programs, whether organized internally or by external parties. The competency development programs in which the ALCO participated in 2025 are as follows:

Topik Pelatihan *Training Topic*	Penyelenggara *Organizer*	Tanggal Pelatihan *Training Date*
Basic Technical Analysis & Implementation in Bond Market	PHEI	22-23 Oktober 2025 *October 22–23, 2025*
Review Perhitungan LCR, NSFR & Persiapan Perhitungan Internal Liquidity Adequacy Assessment Process (ILAAP) *Review of LCR and NSFR Calculations & Preparation for the Internal Liquidity Adequacy Assessment Process (ILAAP)*	Key Pro	8-10 Januari 2025 *January 8–10, 2025*
Risk Management : Good Market & Liquidity Risk Strategy & Controlling	Key Pro	12-13 November 2025 *November 12–13, 2025*

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.

Mechanism for the Appointment and Dismissal of Committee Members

The process for appointing and dismissing members of the Bank's ALCO is based on the Bank's Board of Directors' Decision regarding the Appointment of ALCO Members and guided by the Internal Memorandum on the Reorganization of the ALCO at 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.

Information Technology Steering Committee

The Information Technology Steering Committee is a supporting body established by the Bank as required by Bank Indonesia's Regulation on the Implementation of Risk Management in the Use of Information Technology by Commercial Banks.

Piagam Komite

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

Committee Charter

The Information Technology Steering Committee carries out its duties and responsibilities in accordance with the Board of Directors' Resolution of 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;

Duties, Responsibilities, and Authorities of the Committee

The Information Technology Steering Committee has the primary duty of providing input or recommendations to the Board of Directors regarding:

1. *The Information Technology Strategic Plan, which is 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-upon project plan (project charter);*
5. *Alignment of information technology with management information system requirements and the Bank's business needs;*
6. *The effectiveness of measures to minimize risks associated with the Bank's investments in the information technology sector, so that such investments contribute to the achievement of the Bank's business objectives;*

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.

7. Monitoring of information technology performance and efforts to improve information technology performance;
8. Resolving various information technology-related issues that cannot be effectively, efficiently, and timely resolved by the User Units and the Information Technology Provider; and
9. The adequacy and allocation of the Bank's resources.

Kedudukan Komite

Position of Information Technology Steering Committee

Secara struktural, kedudukan Komite Pengarah Teknologi Informasi berada di bawah Direktur Teknologi Informasi Bank. Meski demikian, Komite Pengarah Teknologi Informasi wajib menyampaikan laporan pelaksanaan tugasnya secara langsung kepada Direktur Utama Bank.

Structurally, the Information Technology Steering Committee reports to the Bank's Chief Information Officer. However, the Information Technology Steering Committee is required to report directly to the Bank's President Director regarding the execution of its duties.

Komposisi dan Profil Komite

Composition and Profile of the Committee

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

In accordance with the Board of Directors' Resolution of PT Bank Sahabat Sampoerna, the membership of the Information Technology Steering Committee is as follows:

Ketua (Anggota Tetap) *Chairman (Permanent Member)*	Direktur Teknologi Informasi *Information Technology Director*
Sekretaris (Anggota Tetap) *Secretary (Permanent Member)*	IT Strategic Planning, Governance & Risk Management
Anggota Tetap *Permanent Member*	• President Director • Chief ESME • Business Director • Finance & Business Planning Director • Compliance & Risk Director • Chief Human Capital Officer • Chief Internal Auditor
Ketua (Anggota Tetap) *Chairman (Permanent Member)*	Direktur Teknologi Informasi *Information Technology Director*
Sekretaris (Anggota Tetap) *Secretary (Permanent Member)*	IT Strategic Planning, Governance & Risk Management
Anggota Tetap *Permanent Member*	• President Director • Chief ESME • Business Director • Finance & Business Planning Director • Compliance & Risk Director • Chief Human Capital Officer • 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 members of the Information Technology Steering Committee are disclosed in the Executive Profiles section of the Company Profile chapter in this Annual Report.

Independensi

Independence

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.

Members of the Information Technology Steering Committee are committed to prioritizing independence, acting objectively, and exercising due diligence in the performance of their duties and responsibilities. Furthermore, the committee consistently ensures that it has no conflicts of interest with other Bank bodies and does not accept interference from Shareholders. This commitment is reflected in the fulfillment of the following independence requirements.

Aspek Independensi *Aspects of Independence*	**Ketua (Merangkap Anggota Tetap)** *Chairman (concurrently as Permanent Member)*	**Sekretaris (Merangkap Anggota)** *Secretary (Concurrently as Member)*	**Anggota Tetap** *Permanent Member*
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. *Has no financial relationship with the Board of Commissioners and the Board of Directors.*	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. *Has no management relationship with Shareholders, Subsidiaries, or affiliated companies.*	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. *Has no shareholding relationship with the Bank.*	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Pengarah Teknologi Informasi. *Has no family relationship with the Board of Commissioners, the Board of Directors, and/or fellow members of the Information Technology Steering Committee.*	v	v	v

v : Terpenuhi | *Fulfilled*
x : Tidak terpenuhi | *Not fulfilled*

Pelaksanaan Tugas Komite di Tahun 2025

Sepanjang tahun 2025, Komite Pengarah Teknologi Informasi melaksanakan tugas dan tanggung jawabnya melalui sejumlah program, antara lain:

Implementation of the Committee's Duties in 2025

Throughout 2025, the Information Technology Steering Committee implemented its duties and responsibilities through a number of programs, including:

Program Kerja *Work Program*	**Pelaksanaan** *Implementation*
IT Steering Committee	• Q1 2025 • Q2 2025 • Q3 2025 • Q4 2025
Rencana Pengembangan TI 2025 *IT Development Plan 2025*	• Februari 2025 (Revisi) • June 2025 (Revisi) • *February 2025 (Revised)* • *June 2025 (Revised)*
Rencana Pengembangan TI 2026 *IT Development Plan 2026*	November 2025

Rekomendasi

Selain melaksanakan sejumlah program kerja strategis, Komite Pengarah Teknologi Informasi juga telah menyampaikan sejumlah rekomendasi terkait pengelolaan teknologi informasi, antara lain:

1. Peningkatan monitoring dari Security Operation Center - SOC 24/7.
2. Memastikan Annual Pentest dijalankan tepat waktu dan diremediasi sesuai target.
3. Program Security Awareness kepada seluruh karyawan maupun pihak Penyedia Jasa TI.
4. Peningkatan Keamanan Siber sesuai standar NIST Framework dan standar keamanan dari regulator.
5. Program Peta Jalan Keamanan Siber secara berkelanjutan.
6. Pembentukan tim tanggap insiden siber.

Recommendations

In addition to implementing a number of strategic work programs, the Information Technology Steering Committee has also issued several recommendations regarding information technology management, including:

1. *Enhancing monitoring by the Security Operations Center (SOC) 24/7.*
2. *Ensuring that the Annual Penetration Test is conducted on time and that issues are remediated as per the targets.*
3. *Security Awareness programs for all employees and IT Service Providers.*
4. *Enhancing cybersecurity in accordance with the NIST Framework and regulatory security standards.*
5. *A continuous Cybersecurity Roadmap program.*
6. *Establishment of a cyber incident response team.*

7. Meningkatkan fitur-fitur digital, baik untuk transaksi finansial maupun non-finansial.
8. Penerapan prosedur dan tata kelola TI terkait pengadaan, perubahan, dan peningkatan sistem.
9. Penerapan prosedur pengelolaan perubahan sistem baik dari sisi aplikasi, perangkat keras, maupun infrastruktur di area produksi.
10. Penerapan prosedur yang berkaitan dengan penyediaan personil yang mendukung operasional TI, standar proses eskalasi, dan standar service level agreement (SLA).
11. Penerapan prosedur standar dalam menjalankan operasional data center mencakup operation management, system management, network management, media storage keeping, serta memastikan kapasitas dan kemampuan DRC.

7. Enhancing digital features for both financial and non-financial transactions.
8. Implementation of IT procedures and governance related to system procurement, changes, and upgrades.
9. Implementation of system change management procedures for applications, hardware, and infrastructure in the production environment.
10. Implementation of procedures related to the provision of personnel supporting IT operations, standard escalation processes, and standard service level agreements (SLAs).
11. Implementation of standard procedures for data center operations, including operation management, system management, network management, media storage management, and ensuring the capacity and capabilities of the DRC.

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 2025, Komite Pengarah Teknologi Informasi telah melaksanakan rapat sebanyak 4 (Empat) kali. Adapun rincian pelaksanaan dan agenda rapat Komite Pengarah Teknologi Informasi di tahun 2025 dapat dilihat sebagai berikut:

Committee Meetings

The Information Technology Steering Committee holds internal meetings at least four (4) times a year (quarterly) or may convene at any time as needed by the Bank. Throughout 2025, the Information Technology Steering Committee held four (4) meetings. The details of the implementation and agenda of the Information Technology Steering Committee meetings in 2025 are as follows:

<table>
<tr><th>Tanggal
Date</th><th>Agenda</th></tr>
<tr><td>12 Februari 2025
February 12, 2025</td><td rowspan="4">• IT Steering Committee
› Latar belakang
› Struktur Komite Pengarah TI
› Struktur Organisasi TI
› Background
› IT Steering Committee Structure
› IT Organizational Structure

• IT Strategic Planning, Governance & Risk Management
› 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

• IT Service Delivery
› System Application Availability Performance
› Summary IT Service Delivery (Production Request & Problem Management, Transaction Volume, Digital Lending Volume (ARO), SMB & Card Transaction)
› Other updates

• IT Infrastructure & Security
› IT Infrastructure & Security Deliverable/ Timeline Status
› BSS Cyber Security Threat Intelligence

• IT Business Enablement
› Regular Key Projects/ Summary Initiative
› Highlighted Realization
› Highlighted Ongoing Initiatives</td></tr>
<tr><td>5 Mei 2025
May 5, 2025</td></tr>
<tr><td>11 Agustus 2025
August 11, 2025</td></tr>
<tr><td>5 November 2025
November 5, 2025</td></tr>
</table>

Pengembangan Kompetensi

Untuk menunjang Komite Pengarah Teknologi Informasi dalam melaksanakan tugas dan tanggung jawabnya, Bank Sahabat Sampoerna memberikan kesempatan kepada anggota Komite untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal maupun pihak eksternal. Adapun program pengembangan kompetensi yang diikuti oleh Komite Pengarah Teknologi Informasi di tahun 2025 adalah sebagai berikut:

Competency Development

To support the Information Technology Steering Committee in carrying out its duties and responsibilities, Bank Sahabat Sampoerna provides Committee members with the opportunity to participate in training and competency development programs, whether organized internally or by external parties. The competency development programs participated in by the Information Technology Steering Committee in 2025 are as follows:

Topik Pelatihan *Training Topics*	**Penyelenggara** *Organizer*	**Tanggal Pelatihan** *Training Date*
Sertifikasi Manajemen Risiko *Risk Management Certification*	Garda	2025
Webinar The 2025 ASEAN-KOREA Financial Cooperation Forum dengan tema "The Future of Digital Innovation in Finance" *Webinar: The 2025 ASEAN-KOREA Financial Cooperation Forum with the theme "The Future of Digital Innovation in Finance"*	OJK	2025

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 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.

Mechanism for the Appointment and Dismissal of Committee Members

The appointment and removal of the Chair of the Information Technology Steering Committee are subject to the authority of the Board of Directors, with the term of office not exceeding that of the Bank's Board of Directors. The individual appointed as Chair of this committee must be a Bank Director responsible for technology and information. Furthermore, the procedure for dismissing the Chair of the Information Technology Steering Committee is carried out upon the expiration of the term of office or may be dismissed at any time in accordance with a resolution of the General Meeting of Shareholders or a Board of Directors' Decision of PT Bank Sahabat Sampoerna.

Komite Manajemen Risiko Operasional

Komite Manajemen Risiko Operasional (KMRO) merupakan bagian yang tidak terpisahkan dari Komite Manajemen Risiko Bank dan berada di bawah koordinasi Direksi. KMRO melaksanakan tugas dan tanggung jawab dengan fokus pada pengelolaan risiko operasional serta jenis risiko lainnya, termasuk risiko hukum, strategis, reputasi, dan kepatuhan. Pembentukan KMRO bertujuan untuk memastikan efektivitas penerapan manajemen risiko operasional dan risiko lainnya secara menyeluruh, mendukung pencapaian strategi Bank sesuai dengan kebijakan dan prosedur risiko operasional yang berlaku, serta memastikan bahwa strategi tersebut telah diimplementasikan secara efektif oleh Divisi Bisnis dan fungsi-fungsi pendukung, selaras dengan strategi dan kegiatan usaha masing-masing.

Operational Risk Management Committee

The Operational Risk Management Committee (KMRO) is an integral part of the Bank's Risk Management Committee and operates under the coordination of the Board of Directors. The KMRO carries out its duties and responsibilities with a focus on managing operational risks as well as other types of risks, including legal, strategic, reputational, and compliance risks. The establishment of the KMRO aims to ensure the effective implementation of operational risk management and other risks comprehensively, support the achievement of the Bank's strategy in accordance with applicable operational risk policies and procedures, and ensure that such strategies are effectively implemented by the Business Divisions and supporting functions, in alignment with their respective business strategies and activities.

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.

Committee Charter

KMRO carries out its duties and responsibilities in accordance with the General Risk Management Policy, specifically the chapter on the Implementation of Operational Risk Management, as set forth in Bank Sahabat Sampoerna's Specific Operational Risk Management Policy.

Tugas, Tanggung Jawab, dan Wewenang Komite

Berdasarkan Kebijakan Umum Manajemen Risiko, 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 Unit Kerja, terutama Kantor Cabang;
2. Melaporkan perkembangan penyelesaian komitmen atas temuan KCSA maupun insiden risiko operasional;
3. Membahas dan menganalisis kejadian risiko operasional yang tercatat dalam *Loss Event Database* (LED) beserta *lesson learned* guna mendukung peningkatan pengelolaan risiko operasional;
4. Membahas dan menganalisis efektivitas pelaksanaan *Business Continuity Management* (BCM);
5. Membahas perkembangan implementasi proyek UU Pelindungan Data Pribadi; serta
6. Melaporkan pengembangan dan/atau reviu *rules Exposure Management System* (EMS) sebagai bagian dari penguatan pengendalian risiko *fraud*.

Duties, Responsibilities, and Authorities of the Committee

Based on the General Risk Management Policy, the KMRO has the following primary duties and responsibilities:

1. *Conducting evaluations of the implementation of risk management policies and providing recommendations to management regarding policies or follow-up actions that must be taken.*
2. *Serve as a forum facilitator to conduct the identification, assessment, mitigation, and ongoing monitoring of risk profiles and other operational issues.*

In addition, the KMRO is also responsible for advising the Risk Management Committee by:

1. *Reporting the results of the Key Control Self-Assessment (KCSA) conducted by business units, particularly branch offices;*
2. *Reporting on the progress of resolving commitments regarding KCSA findings and operational risk incidents;*
3. *Discussing and analyzing operational risk events recorded in the Loss Event Database (LED) along with lessons learned to support the improvement of operational risk management;*
4. *Discussing and analyzing the effectiveness of Business Continuity Management (BCM) implementation;*
5. *Discussing the progress of the implementation of the Personal Data Protection Law project; and*
6. *Reporting on the development and/or review of the Exposure Management System (EMS) rules as part of strengthening fraud risk controls.*

Kedudukan Komite

Secara struktural, KMRO berada di bawah Direktur Kepatuhan & Manajemen Risiko serta berkoordinasi dengan Kepala *Enterprise Risk, Analytics* & *Control*. Sementara untuk pelaporan pelaksanaan tugas selama tahun buku, komite ini menyampaikan secara langsung kepada Direktur Utama Bank.

Position of Operational Risk Management Committee

Structurally, the KMRO reports to the Compliance & Risk Director and coordinates with the Head of Enterprise Risk, Analytics & Control. Regarding reporting on the performance of duties during the fiscal year, the committee reports directly to the Bank's President Director.

Komposisi dan Profil Komite

Committee Composition and Profile

Komposisi Komite KMRO telah diatur dalam Kebijakan Khusus Manajemen Risiko Operasional No. BSS/KK-KRO/MRI/03. Adapun komposisi Komite KMRO di tahun 2025 dapat dilihat sebagai berikut:

The composition of the KMRO Committee is stipulated in Special Policy on Operational Risk Management No. BSS/KK-KRO/MRI/03. The composition of the KMRO Committee in 2025 is as follows:

Ketua (Merangkap Anggota Tetap) *Chairman (concurrently as a Permanent Member)*	Kepala *Enterprise Risk, Analytics & Control* *Enterprise Risk, Analytics & Control Head*
Sekretaris (Merangkap Anggota) *Secretary (concurrently as a member)*	*Operational Risk Department Head*
Anggota Tetap *Permanent Members*	Kepala unit-unit kerja terkait dengan risiko operasional termasuk Kepala Satuan Kerja Kepatuhan, jika diperlukan melibatkan Satuan Kerja Audit Internal sebagai narasumber. *Heads of units related to operational risk, including the Head of the Compliance Unit; where necessary, the Internal Audit Unit is involved as a resource.*

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

The profiles of KMRO members have been disclosed in the Profiles of Risk Management Unit Heads and Executive Officers in this Annual Report.

Independensi

Independence

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.

KMRO members are committed to prioritizing independence, acting objectively, and exercising due diligence in the performance of their duties and responsibilities. Furthermore, the committee consistently ensures that it has no conflicts of interest with other Bank bodies and does not accept interference from Shareholders. This commitment is reflected in the fulfillment of the following independence requirements.

Aspek Independensi *Aspects of Independence*	**Ketua (Merangkap Anggota Tetap)** *Chairman (concurrently as Permanent Member)*	**Sekretaris (Merangkap Anggota)** *Secretary (Concurrently as Member)*	**Anggota Tetap** *Permanent Member*
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. *Has no financial relationship with the Board of Commissioners and the Board of Directors.*	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. *Has no management relationship with Shareholders, Subsidiaries, or affiliated companies.*	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. *Has no shareholding relationship with the Bank.*	v	v	v
Tidak memiliki hubungan keluarga Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Manajemen Risiko Operasional. *Has no family relationship with the Board of Commissioners, the Board of Directors, and/or fellow members of the Operational Risk Management Committee.*	v	v	v

v : Terpenuhi | *Fulfilled*
x : Tidak terpenuhi | *Not fulfilled*

Pelaksanaan Tugas Komite di Tahun 2025

Committee Activities in 2025

Sepanjang tahun 2025, KMRO telah melaksanakan tugas dan tanggung jawabnya dengan menjalankan sejumlah program kerja strategis, di antaranya:

Throughout 2025, KMRO has implemented its duties and responsibilities by implementing a number of strategic work programs, including:

Program Kerja *Work Programs*	**Pelaksanaan** *Implementation*
Mengevaluasi penguatan implementasi manajemen risiko operasional serta memberikan rekomendasi terkait langkah dan tindak lanjut atas isu operasional. *Evaluating the strengthening of operational risk management implementation and providing recommendations regarding steps and follow-up actions on operational issues.*	• Mendiskusikan dan mengevaluasi hasil *Key Control Self-Assessment* (KCSA) yang disampaikan oleh unit kerja terkait. • Mendiskusikan dan mengevaluasi kejadian terkait dengan isu risiko operasional yang tercatat dalam *Loss Event Database* (LED). • Mendiskusikan dan mengevaluasi pelaksanaan *Business Continuity Management* (BCM). • Mendiskusikan dan mengevaluasi implementasi Pelindungan Data Pribadi (PDP). • Mendiskusikan dan mengevaluasi pengembangan dan/atau reviu rules *Exposure Management System* (EMS). • *Discussing and evaluating the results of the Key Control Self-Assessment (KCSA) submitted by the relevant work units.* • *Discuss and evaluate incidents related to operational risk issues recorded in the Loss Event Database (LED).* • *Discuss and evaluate the implementation of Business Continuity Management (BCM).* • *Discuss and evaluate the implementation of Personal Data Protection (PDP).* • *Discuss and evaluate the development and/or review of Exposure Management System (EMS) rules.*

Rekomendasi

Recommendations

Selain melaksanakan program kerja, KMRO juga telah menyampaikan sejumlah rekomendasi terkait risiko operasional Bank sepanjang tahun 2025, sebagaimana tercatat dalam Notulen Rapat Komite Manajemen Risiko Operasional tahun 2025.

In addition to performing its work program, the KMRO has also submitted a number of recommendations regarding the Bank's operational risks throughout 2025, as recorded in the Minutes of the 2025 Operational Risk Management Committee Meeting.

Pelaksanaan Rapat Komite

Operational Risk Management Committee Meeting

Sepanjang tahun 2025, KMRO telah menyelenggarakan rapat sebanyak 4 (empat) kali dengan rincian sebagai berikut:

Throughout 2025, the KMRO held four (4) meetings, with the following details:

Tanggal *Date*	**Agenda** *Agenda*
12 Maret 2025 (Quarter 4 2024) *March 12, 2025* *(Q4 2024)*	• Manajemen Insiden Risiko Operasional • *Exposure Management System* (EMS) • Indonesia *Anti-Scam Center* (IASC) 2024 • Pelindungan Data Pribadi (PDP) • *Business Continuity Management* (BCM) • *Disaster Recovery Plan* (DRP) & *Penetration Testing* 2024 • Pelaporan Maturitas Digital & Maturitas Siber 2024 • Monitoring Implementasi *Block Leave* Karyawan • *Operational Risk Incident Management* • *Exposure Management System (EMS)* • *Indonesia Anti-Scam Center (IASC) 2024* • *Personal Data Protection (PDP)* • *Business Continuity Management (BCM)* • *Disaster Recovery Plan (DRP) & Penetration Testing 2024* • *Digital Maturity & Cyber Maturity Reporting 2024* • *Monitoring of Employee Block Leave Implementation*

Tanggal *Date*	**Agenda** *Agenda*
5 Juni 2025 (Quarter 1 2025) *June 5, 2025* *(Q1 2025)*	• Manajemen Insiden Risiko Operasional • Exposure Management System (EMS) • Indonesia Anti-Scam Center (IASC) 2025 • Penguatan Keamanan Layanan BI-FAST • Pelindungan Data Pribadi (PDP) • Business Continuity Management (BCM) • Disaster Recovery Plan • Monitoring Implementasi Block Leave Karyawan • *Operational Risk Incident Management* • *Exposure Management System (EMS)* • *Indonesia Anti-Scam Center (IASC) 2025* • *Strengthening BI-FAST Service Security* • *Personal Data Protection (PDP)* • *Business Continuity Management (BCM)* • *Disaster Recovery Plan* • *Monitoring the Implementation of Employee Block Leave*

25 Agustus 2025
(Quarter 2 2025)
August 25, 2025
(Q2 2025)
	• Manajemen Insiden Risiko Operasional
	• Kajian Risiko Operasional
	• *Exposure Management System* (EMS)
	• Indonesia *Anti-Scam Center* (IASC) 2025
	• Rencana Strategis Keamanan Sistem Informasi dan Ketahanan Siber (KKS)
	• Pelindungan Data Pribadi (PDP)
	• *Business Continuity Management* (BCM)
	• *Disaster Recovery Plan* (DRP)
	• *People Risk Monitoring*
	  › *Monitoring* Implementasi *Block Leave* Karyawan
	  › *Monitoring* Pelaksanaan Pelatihan dan Sertifikasi
	• *Operational Risk Incident Management*
	• *Operational Risk Assessment*
	• *Exposure Management System (EMS)*
	• *Indonesia Anti-Scam Center (IASC) 2025*
	• *Strategic Plan for Information System Security and Cyber Resilience (KKS)*
	• *Personal Data Protection (PDP)*
	• *Business Continuity Management (BCM)*
	• *Disaster Recovery Plan (DRP)*
	• *People Risk Monitoring*
	  › *Monitoring of Employee Block Leave Implementation*
	  › *Monitoring of Training and Certification Implementation*

16 Desember 2025
(Quarter 3 2025)
December 16, 2025
(Q3 2025)
	• Manajemen Insiden Risiko Operasional
	• *Business Continuity Management* (BCM)
	• *People Risk Monitoring*
	  › *Monitoring* Implementasi *Block Leave* Karyawan
	  › *Monitoring* Pelaksanaan Pelatihan dan Sertifikasi
	• *Exposure Management System* (EMS)
	• Indonesia *Anti-Scam Center* (IASC) 2025
	• Pelindungan Data Pribadi (PDP)
	• Rencana Strategis Keamanan Sistem Informasi dan Ketahanan Siber (KKS)
	• *Disaster Recovery Plan* (DRP)
	• *Operational Risk Incident Management*
	• *Business Continuity Management (BCM)*
	• *People Risk Monitoring*
	  › *Monitoring of Employee Block Leave Implementation*
	  › *Monitoring of Training and Certification Implementation*
	• *Exposure Management System (EMS)*
	• *Indonesia Anti-Scam Center (IASC) 2025*
	• *Personal Data Protection (PDP)*
	• *Strategic Plan for Information System Security and Cyber Resilience (KKS)*
	• *Disaster Recovery Plan (DRP)*

Pengembangan Kompetensi

Untuk menunjang KMRO dalam melaksanakan tugas dan tanggung jawabnya, Bank Sahabat Sampoerna memberikan kesempatan kepada anggota Komite untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal maupun pihak eksternal. Adapun program pengembangan kompetensi yang diikuti oleh KMRO di tahun 2025 adalah sebagai berikut:

Competency Development

To support the KMRO in performing its duties and responsibilities, Bank Sahabat Sampoerna provides Committee members with the opportunity to participate in training and competency development programs, whether organized internally or by external parties. The competency development programs participated in by the KMRO in 2025 are as follows:

Topik Pelatihan *Training Topics*	Penyelenggara *Organizer*	Tanggal Pelatihan *Training Date*
Pembekalan & Uji Sertifikasi Manajemen Risiko Jenjang 4 *Level 4 Risk Management Briefing & Certification Exam*	Garda	26-27 Agustus 2025 *August 26–27, 2025*
Cyber Security	Badan Siber dan Sandi Negara (BSSN) *National Cybersecurity and Cryptography Agency (BSSN)*	16 Oktober 2025 *October 16, 2025*

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.

Mechanism for the Appointment and Removal of Committee Members

The process of appointing and dismissing the Chairman of the KMRO falls under the authority of the Bank's Board of Directors. The individual appointed as chair of this committee must be a senior executive who is part of the Compliance and Risk Management Directorate responsible for managing the Bank's risk management.

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.

Product Committee

The Product Committee is a supporting body of the Board of Directors established to assist the Board in managing and developing the Bank's products, both existing and new.

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.

Committee Charter

The Product Committee carries out its duties and responsibilities in accordance with Financial Services Authority Regulation No. 13/POJK.03/2021 on the Management of Commercial Bank Products.

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 Bisnis, Tim Finance Accounting & Tax, Tim Information Technology Business Enablement, Tim Centralized Operation & Serviced, Tim Enterprise Risk, Analytics & Policy, Tim Compliance, Tim Corporate Legal & Litigation, serta Board of Management (BOM).

Duties, Responsibilities, and Authorities of the Committee

The Product Committee is tasked with and responsible for developing products and undertaking activities not previously conducted by the Bank, in coordination with relevant departments, namely the Business Product Development (BPD) Team, the Business Team, the Finance, Accounting & Tax Team, the Information Technology Business Enablement Team, the Centralized Operations & Services Team, the Enterprise Risk, Analytics & Policy Team, the Compliance Team, the Corporate Legal & Litigation Team, and the 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.

Position of the Product Committee

The Product Committee is a supporting body under the President Director that is responsible for coordinating and submitting Task Implementation Reports directly to the Bank's Board of Directors.

Komposisi dan Profil Komite

Sebagaimana tercantum dalam Memorandum nomor 09/315/MI/BPD/BSS/XI/25, keanggotaan Komite Produk adalah sebagai berikut:

Committee Composition and Profile

As stated in Memorandum No. 09/315/MI/BPD/BSS/XI/25, the membership of the Product Committee is as follows:

Ketua (Merangkap Anggota) *Chairman (concurrently as a member)*	Direktur Utama *President Director*
Anggota Tetap *Permanent Member*	• Compliance & Risk Director • Finance & Business Planning Director • Information Technology Director • ESME Business Director • Chief SME & High End Business • Chief Credit Officer • Chief Digital Business • Funding Product & Bancassurance Business Development Group Head • Lending, Fintech Product & Partnership Division Head • Digital Initiative, Fintech, & Partnership Group Head • Compliance Division Head • Corporate Legal & Litigation Division Head • Finance & Accounting Division Head • Centralized Operation & Service Head • Enterprise Risk, Analytics, Policy & Control Division Head
Anggota Tidak Tetap *Non-Permanent Member*	• Treasury & International Banking Head • Financial Institution Head • Lending Center Division Head • New Business Transformation Division Head • ESME Sales & Performance Management Division Head • Funding Business Division Head • SME & FI Credit Division Head • SME & High End Business Sales and Performance Management • SME Division Head • Collection & SAM Division Head • Information Technology (IT) Business Enablement Division Head • Credit Legal & Collateral Management

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

The profiles of Product Committee members have been disclosed in the Executive Profiles section of 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.

Independence

Members of the Product Committee are committed to prioritizing independence, acting objectively, and exercising due diligence in the performance of their duties and responsibilities. Furthermore, the committee consistently ensures that it has no conflicts of interest with other Bank bodies and does not accept interference from Shareholders. This commitment is reflected in the fulfillment of the following aspects of independence.

Aspek Independensi *Aspects of Independence*	**Ketua (Merangkap Anggota Tetap)**	**Sekretaris (Merangkap Anggota)**	**Anggota Tetap**
Tidak memiliki hubungan keuangan dengan Dewan Komisaris dan Direksi. *Has no financial relationship with the Board of Commissioners and the Board of Directors.*	v	v	v
Tidak memiliki hubungan kepengurusan dengan Pemegang Saham, Entitas Anak, maupun perusahaan afiliasi. *Has no management relationship with Shareholders, Subsidiaries, or affiliated companies.*	v	v	v
Tidak memiliki hubungan kepemilikan saham di Bank. *Has no shareholding relationship with the Bank.*	v	v	v
Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau sesama anggota Komite Produk. *Has no family relationship with the Board of Commissioners, the Board of Directors, and/or other members of the Product Committee.*	v	v	v

Pelaksanaan Tugas Komite di Tahun 2025

Sepanjang tahun 2025, Komite Produk telah melaksanakan tugas dan tanggung jawabnya melalui sejumlah program, antara lain:

Committee Activities in 2025

Throughout 2025, the Product Committee has conducted its duties and responsibilities through a number of programs, including:

Program Kerja *Work Program*	**Pelaksanaan** *Work Program*
Fintech, Lending, Product & Partnership	1. Memberi persetujuan inisiatif baru dan termasuk pengembangan serta perubahan atas inisiatif eksisting, sebagai berikut : 2. **Layanan dan Produk Pembiayaan** › *Digital Signature System* BSS bekerja sama dengan Penyelenggara Sertifikasi Elektronik (PSrE) › *Buy Now Pay Later* (BNPL) › *Sampoerna Business Solutions* (SBS) › Kredit Multi Guna (KMG) Pembiayaan *Handphone* bekerja sama dengan Mitra Strategis **Layanan dan Produk Pembiayaan** › Loket Bank Sampoerna › *Digital Signing System via One Time Password* (OTP) 3. Memberikan arahan atas kerja sama BSS dan Mitra strategis terkait dengan produk pembiayaan › Pembiayaan *Chanelling* bekerja sama dengan Mitra-Mitra strategis › *Direct Lending* kepada *end users* bekerja sama dengan Multifinance, *platform dealer* mobil dan Mitra strategis lainnya. 4. Program Edukasi dan Literasi Keuangan Produk Digital Aplikasi Sampoerna Mobile Banking › *Event Sampoerna* Festival di kota-kota besar di Indonesia diantaranya Samarinda, Makassar, Pekanbaru, dan Pontianak › Program *marketing* untuk meningkatkan akuisisi Nasabah baru, program aktivasi Nasabah untuk menabung dan aktif menggunakan layanan digital BSS serta program *loyalty* untuk Nasabah. *1. Approving new initiatives, including the development and modification of existing initiatives, as follows:* ***Financing Services and Products*** › *The BSS Digital Signature System partners with Electronic Certification Authorities (ECAs)* › *Buy Now Pay Later (BNPL)* › *Sampoerna Business Solutions (SBS)* › *Multi-Purpose Credit (KMG) Mobile Phone Financing in collaboration with Strategic Partners* ***Financing Services and Products*** › *Sampoerna Bank Counter* › *Digital Signing System via One-Time Password (OTP)* *2. Providing guidance on the collaboration between BSS and strategic partners regarding financing products* › *Financing Channeling in collaboration with Strategic Partners* › *Direct Lending to end users in collaboration with Multifinance, car dealer platforms, and other strategic partners.* *3. Financial Education and Literacy Programs Digital Products: Sampoerna Mobile Banking App* › *Sampoerna Festival events in major cities across Indonesia, including Samarinda, Makassar, Pekanbaru, and Pontianak* › *Marketing programs to increase new customer acquisition, customer activation programs to encourage savings and active use of BSS digital services, and customer loyalty programs.*

Program Kerja *Work Program*	**Pelaksanaan** *Work Program*
Funding & Bancassurance Business Development	1. Pengembangan Produk dan Layanan baru yang bertujuan untuk meningkatkan daya saing BSS di pasar perbankan. › Kerja Sama *Bancassurance* dengan Mitra Asuransi (PT Asuransi MAG) serta Pengembangan Produk yang Dipasarkan (Asuransi Magna Properti) › *Cash Recycling Machine* (CRM) / ATM Setor Tunai › *Cardless Cash Withdrawal*/Tarik Tunai Tanpa Kartu di ATM Bank Lain melalui Sampoerna *Mobile Banking* › Sampoerna *Mobile Time Deposit*/Deposito *Online* melalui Sampoerna *Mobile Banking* › Produk Tabungan, Giro, dan Deposito Valas serta Layanan *Remittance* untuk mata uang *Australian Dollar* (AUD) › Layanan *Direct Settlement Remittance* untuk mata uang *United States Dollar* (USD) bekerja sama dengan BCA dan Bank Mandiri 2. Penyelenggaraan berbagai program menabung untuk meningkatkan jumlah nasabah dan dana pihak ketiga. › Program *Customer Get Customer* (CGC) Tahun 2025 › Program Gratis Biaya Sewa *Safe Deposit Box* untuk Nasabah Deposito Tahun 2025 › Program *Bundling* Deposito Berjangka dan Tabungan Sampoerna Tahun 2025 › Program *Lock* Dana Berhadiah Emas Tahun 2025 › Program Kemilau Emas Cabang Jabodetabek Tahun 2025 › Program Kemilau Emas Cabang Surabaya dan Malang Tahun 2025 › Program Kemilau Emas Tahun 2025 Periode 2 › Program *Bundling* Deposito Berjangka dan Tabungan Sampoerna Tahun 2025 Periode 2 › Program Kemilau Emas Tahun 2025 Periode 3 › Program Angpao Bank Sahabat Sampoerna *1. Development of new products and services aimed at enhancing BSS's competitiveness in the banking market.* *› Bancassurance Partnership with Insurance Partner (PT Asuransi MAG) and Development of Marketed Products (Magna Property Insurance)* *› Cash Recycling Machine (CRM) / Cash Deposit ATM* *› Cardless Cash Withdrawal at Other Banks' ATMs via Sampoerna Mobile Banking* *› Sampoerna Mobile Time Deposit / Online Time Deposit via Sampoerna Mobile Banking* *› Savings, Checking, and Foreign Currency Deposit Products as well as Remittance Services for the Australian Dollar (AUD)* *› Direct Settlement Remittance Services for the United States Dollar (USD) in collaboration with BCA and Bank Mandiri* *2. Implementation of various savings programs to increase the number of customers and third-party funds.* *› Customer Get Customer (CGC) Program for 2025* *› Free Safe Deposit Box Rental Fee Program for Time Deposit Customers in 2025* *› 2025 Sampoerna Time Deposit and Savings Bundling Program* *› 2025 Lock Funds with Gold Prizes Program* *› 2025 Jabodetabek Branch "Golden Glow" Program* *› 2025 Surabaya and Malang Branch Golden Glow Program* *› 2025 Golden Glow Program, Period 2* *› 2025 Fixed-Term Deposit and Sampoerna Savings Bundling Program, Period 2* *› 2025 Golden Glow Program, Period 3* *› Sampoerna Bank Sahabat Angpao Program*
Digital Initiative, Fintech & Partnership	1. Pengembangan fitur tambahan pada produk eksisting: › Fitur layanan QRIS *Customer Presented Mode* › Layanan API Registrasi berbasis SNAP untuk integrasi dengan calon mitra bisnis melalui layanan BSS. 2. Menetapkan arah kerja sama BSS dengan pihak ketiga, termasuk: › Penambahan *Third Party Processor Card Management System Visa* melalui kerja sama dengan PT Artajasa Pembayaran Elektronis. › Ekspansi pemanfaatan API SNAP melalui onboarding mitra bisnis baru yang telah memenuhi persyaratan regulator, memperoleh rekomendasi ASPI, serta telah dilaporkan kepada Bank Indonesia sesuai ketentuan pelaporan berkala. *1. Development of additional features for existing products:* *› QRIS Customer Presented Mode service feature* *› SNAP-based Registration API service for integration with prospective business partners through the BSS service.* *2. Establishing the direction of BSS's collaboration with third parties, including:* *› Adding a Visa Third-Party Card Management System through a partnership with PT Artajasa Pembayaran Elektronis.* *› Expanding the use of the SNAP API by onboarding new business partners who have met regulatory requirements, obtained an ASPI recommendation, and have been reported to Bank Indonesia in accordance with periodic reporting requirements.*

Rekomendasi

Recommendations

Selain melaksanakan sejumlah program kerja strategis, Komite Produk juga menyampaikan sejumlah rekomendasi terkait pengembangan produk Bank di tahun 2025, antara lain:

In addition to implementing a number of strategic work programs, the Product Committee also presented several recommendations regarding the Bank's product development for 2025, including:

Produk *Product*	**Rekomendasi** *Recommendations*
Fintech, Lending, Product & Partnership	1. *Digital Signature System* BSS bekerja sama dengan Penyelenggara Sertifikasi Elektronik (PSrE) 2. *Buy Now Pay Later* (BNPL) 3. *Sampoerna Business Solutions* 4. Program Kredit Multi Guna (KMG) Pembiayaan *Handphone* Bekerja sama dengan Mitra Strategis 5. Loket Bank Sampoerna 6. *Digital Signing System via One Time Password* (OTP) 7. Pembiayaan *Channelling* bekerja sama dengan Mitra-Mitra strategis 8. *Direct Lending* kepada *end users* bekerja sama dengan Multifinance, *platform dealer* mobil dan Mitra strategis lainnya. 9. Program Edukasi, Literasi, dan Inklusi Keuangan Produk Digital Aplikasi Sampoerna Mobile Banking › *Event* SampoernaFest di kota-kota besar di Indonesia diantaranya Samarinda, Makassar, Pekanbaru, dan Pontianak › Program *marketing* untuk meningkatkan akuisisi Nasabah baru, program aktivasi Nasabah untuk menabung dan aktif menggunakan layanan digital BSS serta program *loyalty* untuk Nasabah. *1. Digital Signature System BSS collaborates with an Electronic Certification Authority (PSrE)* *2. Buy Now Pay Later (BNPL)* *3. Sampoerna Business Solutions* *4. Multi-Purpose Credit Program (KMG) for Mobile Phone Financing in Collaboration with Strategic Partners* *5. Sampoerna Bank Counter* *6. Digital Signing System via One-Time Password (OTP)* *7. Financing Channelling in collaboration with strategic partners* *8. Direct Lending to end users in collaboration with Multifinance, car dealer platforms, and other strategic partners.* *9. Financial Education, Literacy, and Inclusion Programs Digital Products: Sampoerna Mobile Banking App* *› SampoernaFest events in major cities across Indonesia, including Samarinda, Makassar, Pekanbaru, and Pontianak* *› Marketing programs to increase new customer acquisition, customer activation programs to encourage saving and active use of BSS digital services, and customer loyalty programs.*
Funding & Bancassurance Business Development	1. Kerja Sama *Bancassurance* dengan Mitra Asuransi (PT Asuransi MAG) serta Pengembangan Produk yang Dipasarkan (Asuransi Magna Properti) 2. *Cash Recycling Machine* (CRM) / ATM Setor Tunai 3. *Cardless Cash Withdrawal* / Tarik Tunai Tanpa Kartu di ATM Bank Lain melalui Sampoerna *Mobile Banking* 4. Sampoerna *Mobile Time Deposit* / Deposito *Online* melalui Sampoerna *Mobile Banking* 5. Produk Tabungan, Giro, dan Deposito Valas serta Layanan *Remittance* untuk mata uang *Australian Dollar* (AUD) 6. Layanan *Direct Settlement Remittance* untuk mata uang *United States Dollar* (USD) bekerja sama dengan BCA dan Bank Mandiri *1. Bancassurance Partnership with an Insurance Partner (PT Asuransi MAG) and Development of Marketed Products (Magna Property Insurance)* *2. Cash Recycling Machine (CRM) / Cash Deposit ATM* *3. Cardless Cash Withdrawal / Cardless Cash Withdrawal at Other Banks' ATMs via Sampoerna Mobile Banking* *4. Sampoerna Mobile Time Deposit / Online Time Deposit via Sampoerna Mobile Banking* *5. Savings, Checking, and Foreign Currency Deposit Products, as well as Remittance Services for the Australian Dollar (AUD)* *6. Direct Settlement Remittance Services for the United States Dollar (USD) in collaboration with BCA and Bank Mandiri*
Digital Initiative, Fintech & Partnership	1. *QRIS Customer Presented Mode* 2. API Registrasi berbasis SNAP melalui layanan *Consumer Open Banking* BSS. 3. Kerjasama dengan PT Artajasa Pembayaran Elektronis untuk penambahan *Third Party Processor Card Management System Visa.* 4. Kerjasama API SNAP dengan mitra bisnis baru yang telah memenuhi persyaratan. *1. QRIS Customer-Initiated Mode* *2. SNAP-based Registration API via the BSS Consumer Open Banking service.* *3. Collaboration with PT Artajasa Pembayaran Elektronis to add a Third-Party Processor Card Management System for Visa.* *4. SNAP API collaboration with new business partners who have met the requirements.*

Pelaksanaan Rapat Komite

Komite Produk dapat menyelenggarakan rapat paling sedikit sebanyak 1 (satu) kali setiap bulannya. Sepanjang tahun 2025, Komite Produk telah menyelenggarakan rapat sebanyak 8 (delapan) kali dengan rincian sebagai berikut:

Product Committee Meetings

The Product Committee may hold meetings at least once a month. Throughout 2025, the Product Committee held a total of 8 (eight) meetings, as detailed below:

Tanggal *Date*	**Agenda**
3 Februari 2025 *February 3, 2025* 3 Maret 2025 *March 3, 2025* 16 April 2025 *April 16, 2025* 15 Mei 2025 *May 15, 2025* 20 Juni 2025 *June 20, 2025* 18 Juli 2025 *July 18, 2025* 26 Agustus 2025 *August 26, 2025* 29 Oktober 2025 *August 26, 2025*	1. Pembahasan inisiatif produk baru pada segmen Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership, dan Digital Business. 2. Pembahasan perkembangan pelaksanaan peningkatan dan penguatan sistem teknologi informasi yang mendukung pengembangan produk Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership dan Digital Business 3. Sumber daya dan anggaran untuk pengembangan produk Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership dan Digital Business 4. Pembahasan masukan dan umpan balik dari unit kerja terkait sebagai dasar penyempurnaan pengembangan produk Funding, Bancassurance, Lending, Inisiatif Digital, Fintech, Kerja Sama Strategis, dan Digital Business, serta penyelarasan proses bisnis. 5. Tindak lanjut dari pelaksanaan atas keputusan pada rapat di periode sebelumnya terkait dengan pengembangan produk Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership dan Digital Business 6. Rencana tindak lanjut atas aktivitas pengembangan produk Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership dan Digital Business *1. Discussion of new product initiatives in the Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership, and Digital Business segments.* *2. Discussion of progress in implementing improvements and strengthening information technology systems that support the development of Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership, and Digital Business products* *3. Resources and budget for the development of Funding, Bancassurance, Lending, Digital Initiative, Fintech, Partnership, and Digital Business products* *4. Discussion of input and feedback from relevant departments as a basis for refining the development of products in Funding, Bancassurance, Lending, Digital Initiatives, Fintech, Strategic Partnerships, and Digital Business, as well as the alignment of business processes.* *5. Follow-up on the implementation of decisions made at previous meetings regarding the development of Funding, Bancassurance, Lending, Digital Initiatives, Fintech, Partnerships, and Digital Business* *6. Action plan for product development activities in Funding, Bancassurance, Lending, Digital Initiatives, Fintech, Partnerships, and Digital Business*

Pengembangan Kompetensi

Untuk menunjang Komite Produk dalam melaksanakan tugas dan tanggung jawabnya, Bank Sahabat Sampoerna memberikan kesempatan kepada anggota Komite untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal maupun pihak eksternal. Adapun program pengembangan kompetensi yang diikuti oleh Komite Produk di tahun 2025 adalah sebagai berikut:

Competency Development

To support the Product Committee in performing its duties and responsibilities, Bank Sahabat Sampoerna provides Committee members with the opportunity to participate in training and competency development programs, whether organized internally or by external parties. The competency development programs participated in by the Product Committee in 2025 are as follows:

Topik Pelatihan *Training Topics*	**Penyelenggara** *Training Topics*	**Tanggal Pelatihan** *Training Date*
Leading With Impact	*Learning Center* Sahabat Financial Institute *Sahabat Financial Institute Learning Center*	13-14 Maret 2025 *March 13–14, 2025*
Refreshment Sertifikasi Manajemen Risiko Jenjang 5 *Level 5 Risk Management Certification Refresher Course*	*Learning Center* Sahabat Financial Institute *Sahabat Financial Institute Learning Center*	20 Juni 2025 *June 20, 2025*
Pelindungan Data Pribadi *Personal Data Protection*	*Learning Center* Sahabat Financial Institute *Sahabat Financial Institute Learning Center*	16 Juli 2025 *July 16, 2025*
Rencana Aksi Keuangan Berkelanjutan *Sustainable Finance Action Plan*	*Learning Center* Sahabat Financial Institute *Sahabat Financial Institute Learning Center*	22 Agustus 2025 *August 22, 2025*
Cybersecurity (Bersama Badan Siber dan Sandi Negara) *Cybersecurity (In collaboration with the National Cybersecurity and Cryptography Agency)*	*Learning Center* Sahabat Financial Institute *Sahabat Financial Institute Learning Center*	16 Oktober 2025 *October 16, 2025*

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.

Mechanism for the Appointment and Removal of Committee Members

The process of appointing and dismissing the Chair of the Product Committee falls under the authority of the Bank's Board of Directors. The individual appointed as chair of this committee must be a senior executive who is part of the Compliance and Risk Management Directorate.

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. Komite Kredit menjalankan tugas dan tanggung jawabnya dengan berpedoman pada PPK Maret 2020 dan pengkinian *Framework* Batas Wewenang Memutus Kredit (BWMK)

Credit Committee

The Credit Committee is a supporting body of the Board of Directors that plays a role in approving loans, particularly for the micro, small, and medium-sized enterprise (MSME) and small and medium-sized enterprise (SME) segments. Bank Sahabat Sampoerna has implemented a Loan Origination System (LOS) to conduct credit risk assessments. The Credit Committee carries out its duties and responsibilities in accordance with the March 2020 Credit Policy (PPK) and the updated Credit Decision Authority Limits (BWMK) Framework of the Indonesian Banking Association .

Sekretaris Perusahaan

Corporate Secretary

Sekretaris Perusahaan merupakan organ pendukung Direksi yang berperan penting dalam menjaga hubungan antara Bank Sahabat Sampoerna dengan pemangku kepentingan melalui publikasi aktivitas Bank, serta memelihara kewajaran, konsistensi, dan transparansi mengenai hal-hal terkait tata kelola perusahaan dan tindakan korporasi. Sekretaris Perusahaan juga bertanggung jawab dalam menjaga dan membangun citra positif Bank serta menyampaikan informasi kepada masyarakat maupun investor secara tepat waktu, akurat, dan transparan sesuai dengan ketentuan dan peraturan perundang-undangan yang berlaku. Dalam melaksanakan tugas dan tanggung jawabnya, Sekretaris Perusahaan bertanggung jawab langsung kepada Direktur Utama.

The Corporate Secretary serves as a support function for the Board of Directors, playing a crucial role in maintaining relationships between Bank Sahabat Sampoerna and its stakeholders through the publication of the Bank's activities, as well as ensuring fairness, consistency, and transparency regarding matters related to corporate governance and corporate actions. The Corporate Secretary is also responsible for maintaining and building the Bank's positive image and for communicating information to the public and investors in a timely, accurate, and transparent manner in accordance with applicable laws and regulations. In conducting their duties and responsibilities, the Corporate Secretary reports directly 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 dan pembaharuannya pada Surat Penugasan No: 003/PJSG-BSS/XI/2025 sebagai pelaksana tugas Sekretaris Perusahaan.

Corporate Secretary Profile

In November 2024, the Bank appointed Yulfina Yusuf as Head of the Corporate Secretariat Group pursuant to Appointment Letter No. 001/PJSG-BSS/XI/2024 and its renewal in Appointment Letter No. 003/PJSG-BSS/XI/2025 as Acting Corporate Secretary.

Yulfina Yusuf

Kepala Grup Kesekretariatan Perusahaan
Head of the Corporate Secretariat Group

Kewarganegaraan *Nationality*	Usia *Age*	Domisili *Domicile*
Indonesia *Indonesian*	47 Tahun *47 years old*	Jakarta, Indonesia

Dasar Hukum Pengangkatan *Legal Basis of Appointment*	• Surat Penugasan No. 001/PJSG-BSS/XI/2024 pada November 2024 • Surat Penugasan No: 003/PJSG-BSS/XI/2025 pada November 2025	• *Assignment Letter No. 001/PJSG-BSS/XI/2024 dated November 2024* • *Assignment Letter No. 003/PJSG-BSS/XI/2025 dated November 2025*
Riwayat Pendidikan *Educational Background*	*Sarjana Teknik Sipil Universitas Hasanuddin – Makassar*	*Bachelor of Civil Engineering, Hasanuddin University – Makassar*
Keahlian *Expertise*	*Ekonomi, Manajemen, dan Perbankan*	*Economics, Management, and Banking*
Sertifikasi Profesi *Professional Certification*	*Sertifikasi Manajemen Risiko Jenjang 4*	*Level 4 Risk Management Certification*
Riwayat Pekerjaan *Work History*	Beberapa posisi di PT Bank Sahabat Sampoerna: • *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: • *Credit Policy & Alignment Analyst* TL/MGR • *Branch Manager* Cabang Bank Danamon Bantaeng Sul - Sel • *Performance Monitoring Officer*	*Various positions at PT Bank Sahabat Sampoerna:* • *Head of Corporate Secretarial Group, PJS (2024 – present)* • *Head of Credit & Market Risk Group (2021 – present)* • *Head of Credit Risk & Policy Group (2019 – 2021)* • *Head of SME & FI Credit Policy Department (2015 – 2019)* *Selected positions at PT Bank Danamon Tbk:* • *Credit Policy & Alignment Analyst TL/MGR* • *Branch Manager, Bank Danamon Bantaeng Branch, South Sulawesi* • *Performance Monitoring Officer*
Rangkap Jabatan *Concurrent Position*	Tidak memiliki rangkap jabatan di perusahaan lain di luar Grup Sampoerna Strategic.	*Does not hold any concurrent positions at other companies outside the Sampoerna Strategic Group*
Hubungan Afiliasi *Affiliation*	Tidak memiliki hubungan keuangan, kepengurusan, dan kekeluargaan dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.	*Does not have any financial, managerial, or family ties with members of the Board of Commissioners, members of the Board of Directors, or major and controlling shareholders.*
Kepemilikan Saham *Share Ownership*	Tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic.	*Does not hold any shares in either Bank Sahabat Sampoerna or any other company affiliated with the Sampoerna Strategic Group.*

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.

Duties, Responsibilities, and Authorities of the Corporate Secretary

The Corporate Secretary performs the following duties and responsibilities:

1. *Convening meetings of the Board of Commissioners, the Board of Directors, joint meetings (Board of Commissioners and Board of Directors'), and the Board of Commissioners' Auxiliary Committee, as well as preparing the minutes of such meetings.*
2. *Ensure that every discussion in the meeting is followed up by the relevant person in charge.*
3. *Handling the filing and administration of the meeting minutes and related documents.*
4. *Managing incoming and outgoing mail, particularly regarding regulatory agencies.*

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.
9. Memimpin dan mengatur Sekretaris Perusahaan dan memastikan tim tersebut memiliki kemampuan yang baik dalam menjalankan tugasnya.

5. Manage incoming non-regulatory correspondence.
6. Preparing routine reports, including:
   a. To regulators and shareholders regarding in-house financial reports; and
   b. The parent company's financial reports.
7. Handling publications, including the publication of Quarterly Financial Reports and base lending rates, both monthly and quarterly.
8. Manage the preparation of the Bank's Annual Report and its submission to regulators.
9. Lead and manage the Corporate Secretary and ensure that the team is well-equipped to perform its duties.

Pengembangan Kompetensi Sekretaris Perusahaan

Untuk menunjang Sekretaris Perusahaan dalam melaksanakan tugas dan tanggung jawabnya, Bank Sahabat Sampoerna memberikan kesempatan kepada Sekretaris Perusahaan untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal maupun pihak eksternal. Adapun program pengembangan kompetensi yang diikuti oleh Sekretaris Perusahaan di tahun 2025 adalah sebagai berikut:

Corporate Secretary Competency Development

To support the Corporate Secretary in conducting their duties and responsibilities, Bank Sahabat Sampoerna provides opportunities for the Corporate Secretary to participate in training and competency development programs, both those organized internally and by external parties. The competency development programs participated in by the Corporate Secretary in 2025 are as follows:

Topik Pelatihan *Training Topics*	**Penyelenggara** *Organizer*	**Tanggal Pelatihan** *Training Date*
Good Corporate Secretary & Good Corporate Culture	Key-Pro	5 Desember 2025 *December 5, 2025*
Sertifikasi Manajemen Risiko Jenjang 4 *Level 4 Risk Management Certification*	Garda	April 2025 *April 2025*

Pelaksanaan Tugas dan Kegiatan Sekretaris Perusahaan Tahun 2025

Sepanjang tahun 2025, Sekretaris Perusahaan telah menjalankan tugas dan tanggung jawab dengan efektif melalui sejumlah kegiatan yang dilaksanakan sesuai dengan tugas dan tanggung serta wewenang sekretaris perusahaan bank.

Implementation of Corporate Secretary Duties and Activities in 2025

Throughout 2025, the Corporate Secretary has effectively conducted their duties and responsibilities through a number of activities conducted in accordance with the duties, responsibilities, and authority of a bank's corporate secretary.

Satuan Kerja Audit Internal

Internal Audit Unit

Satuan Kerja Audit Internal merupakan organ pendukung Bank yang berfungsi sebagai pertahanan lapis ketiga (*third line of defense*). Satuan Kerja Audit Internal menjalankan peran pengawasan dan evaluasi atas efektivitas pengendalian internal Bank melalui pelaksanaan pemeriksaan yang komprehensif dan berkesinambungan pada setiap divisi kerja. Selain itu, Satuan Kerja Audit Internal melaksanakan kegiatan assurance dan consulting secara independen dan objektif guna memberikan nilai tambah serta mendukung peningkatan kinerja operasional Bank secara berkelanjutan.

The Internal Audit Unit is a support unit of the Bank that functions as the third line of defense. The Internal Audit Unit performs oversight and evaluation of the effectiveness of the Bank's internal controls through the conduct of comprehensive and continuous audits across all business divisions. In addition, the Internal Audit Unit conducts assurance and consulting activities independently and objectively to provide added value and support the continuous improvement of the Bank's operational performance.

Piagam Audit Internal

Bank Sahabat Sampoerna telah memiliki Piagam Internal Audit yang telah diperbarui dan disahkan oleh Dewan Komisaris dan Direksi pada 17 Desember 2025. Piagam ini berfungsi sebagai pedoman bagi Satuan Kerja Audit Internal dalam menjalankan tugas dan tanggung jawabnya dalam melaksanakan fungsi audit internal di Bank. Piagam ini disusun sesuai 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. Persyaratan Auditor Internal
5. Fungsi Kepala Satuan Kerja Audit Intern
6. Tugas Pokok dan Tanggung Jawab Pelaksanaan Fungsi Audit Intern
7. Wewenang Auditor Internal
8. Independendsi, Obejektivitas, dan Profesionalisme
9. Aktivitas Audit Intern
10. Hubungan Dengan Unit Kerja Pengendalian dan Audit Ekstern
11. Penggunaan Jasa Pihak Ekstern Dalam Pelaksanaan Audit Intern
12. Peran Assurance dan Consultacy
13. Peran Quality Assurance
14. Lain-lain

Internal Audit Charter

Bank Sahabat Sampoerna has an Internal Audit Charter that was updated and approved by the Board of Commissioners and the Board of Directors on December 17, 2025. This Charter serves as a guideline for the Internal Audit Unit in conducting its duties and responsibilities in performing internal audit functions at the Bank. This Charter was drafted in accordance with Financial Services Authority Regulation No. 01/POJK.03/2019 concerning the Implementation of Internal Audit Functions at Commercial Banks and the Implementation of Internal Audit Functions at Commercial Banks in Indonesia. The contents of the Internal Audit Charter consist of:

1. *Vision and Mission;*
2. *Structure and Position within the Organization;*
3. *Scope;*
4. *Requirements for Internal Auditors*
5. *Functions of the Head of the Internal Audit Unit*
6. *Primary Duties and Responsibilities in Performing Internal Audit Functions*
7. *Authority of Internal Auditors*
8. *Independence, Objectivity, and Professionalism*
9. *Internal Audit Activities*
10. *Relationship with the External Control and Audit Unit*
11. *Use of External Services in the Conduct of Internal Audits*
12. *The Roles of Assurance and Consultancy*
13. *The Role of Quality Assurance*
14. *Miscellaneous*

Visi dan Misi
Vision and Mission

Visi *Vision*
Menjadi stratjik mitra yang professional, independent, kompeten, untuk mendukung tujuan perusahaan menjadi institusi keuangan pilihan masyarakat yang berfokus pada sector usaha mikro, kecil dan menengah dengan pelayanan yang terpercaya dan professional *To be a professional, independent, and competent strategic partner, supporting the company's goal of becoming the community's preferred financial institution focused on the micro, small, and medium enterprise (MSME) sector, providing reliable and professional services*

Misi
Mission

Membantu mencapai tujuan perusahaan melalui assurance dan consulting yang independen dan objektif, serta memberikan nilai tambah atas kinerja yang dihasilkan, melalui:
- 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.
- Meningkatkan sinergi fungsi Audit Intern dan Audit Ekstern

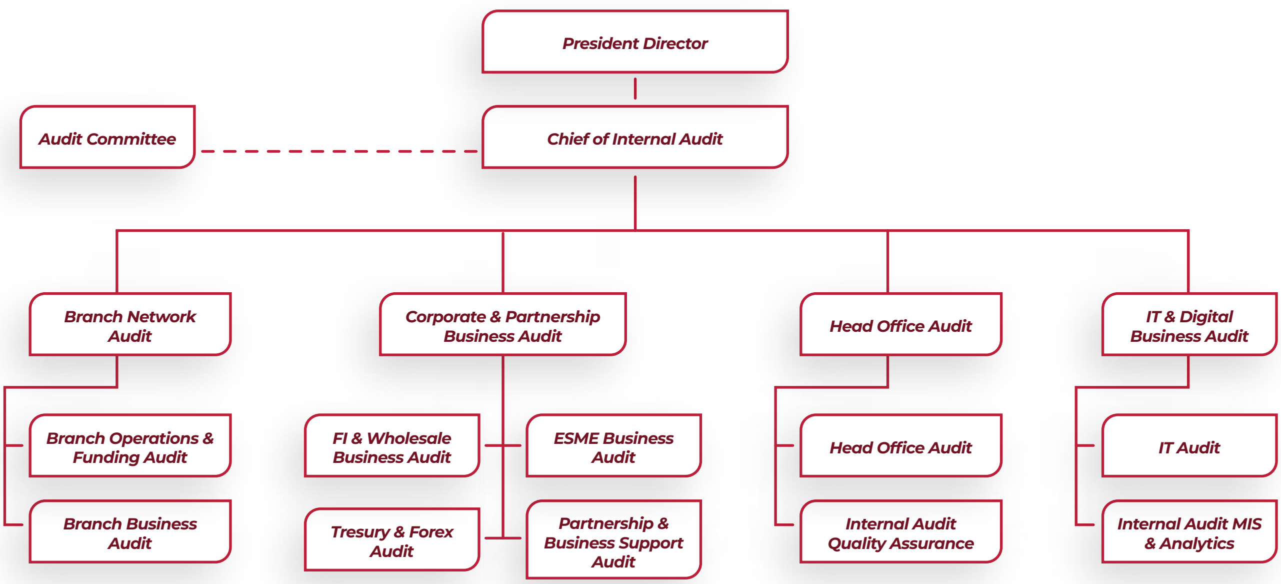
To help achieve the company's objectives through independent and objective assurance and consulting services, and to provide added value to the results achieved, by:
- *Evaluating the effectiveness and adequacy of internal controls, risk management, and corporate governance processes through the application of risk-based audits;*
- *Providing independent and objective consulting services tailored to the auditee's needs regarding new activities or products, in accordance with the best recommendations from Internal Audit;*
- *Effectively and efficiently managing internal audit activities;*
- *Developing the competencies of internal auditors through the acquisition of certifications and professional qualifications aligned with the organization's needs and development, as well as intensifying the use of information technology; and Enhancing synergy between the internal audit and external audit functions.*
- *Enhancing synergy between the Internal Audit and External Audit functions*

Kedudukan dan Struktur Audit Internal

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. Adapun kedudukan Satuan Kerja Audit Internal dalam struktur organisasi Bank dapat dilihat sebagai berikut:

Position and Structure of Internal Audit

Structurally, the Internal Audit Unit reports directly to the President Director and coordinates with the Audit Committee, which reports to the Board of Commissioners. The position of the Internal Audit Unit within the Bank's organizational structure is as follows:



Jumlah Auditor

Per 31 Desember 2025, jumlah auditor internal dalam Satuan Kerja Audit Internal Bank berjumlah 35 orang, termasuk Kepala Satuan Kerja Audit Internal.

Profil Kepala Satuan Kerja Audit Internal

Di tahun 2025, Kepala Satuan Kerja Audit Internal dijabat oleh Nancy Suryani selaku Chief Internal Auditor. Penunjukan ini ditetapkan melalui Surat Keputusan No. 0823/IM/HC/BSS/VIII/2022 tanggal 5 Agustus 2022. Adapun profil Kepala Satuan Kerja Audit Internal dapat dilihat sebagai berikut:

Number of Auditors

As of December 31, 2025, the number of internal auditors in the Bank's Internal Audit Unit totaled 35, including the Head of the Internal Audit Unit.

Profile of the Head of the Internal Audit Unit

In 2025, the Head of the Internal Audit Unit is held by Nancy Suryani as Chief Internal Auditor. This appointment was established through Decree No. 0823/IM/HC/BSS/VIII/2022 dated August 5, 2022. The profile of the Head of the Internal Audit Unit is as follows:

Nancy Suryani

Kepala Internal Audit
Chief Internal Auditor

Kewarganegaraan *Nationality*	**Usia** *Age*	**Domisili** *Domicile*
Indonesia *Indonesian*	54 Tahun *54 years old*	Jakarta, Indonesia

Dasar Hukum Pengangkatan *Legal Basis of Appointment*	Surat Keputusan No. 0823/IM/HC/BSS/VIII/2022	*Decree No. 0823/IM/HC/BSS/VIII/2022*
Riwayat Pendidikan *Educational Background*	• Magister jurusan Manajemen Keuangan, STIE IPWI, Jakarta (1998) • Sarjana Akuntansi, Universitas Tarumanagara, Jakarta (1994)	• *Master's Degree in Financial Management, STIE IPWI, Jakarta (1998)* • *Bachelor of Accounting, Tarumanagara University, Jakarta (1994)*
Keahlian *Expertise*	Perbankan Banking	*Banking*
Sertifikasi Profesi *Professional Certification*	• Sertifikasi Manajemen Risiko Jenjang 7 • Sertifikasi QIA Tingkat Manajerial Khusus Kepala SPI/CAE	• *Level 7 Risk Management Certification* • *QIA Certification at the Managerial Level, Specializing in Head of SPI/CAE*
Riwayat Pekerjaan *Work History*	• 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 at PT Bank Danamon Indonesia Tbk* • *Credit Advisor at PT Bank Central Asia Tbk*
Rangkap Jabatan *Concurrent Position*	Tidak memiliki rangkap jabatan di perusahaan lain di luar Grup Sampoerna Strategic.	*Does not hold any concurrent positions at other companies outside the Sampoerna Strategic Group*
Hubungan Afiliasi *Affiliation*	Tidak memiliki hubungan keuangan, kepengurusan, dan kekeluargaan dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.	*Does not have any financial, managerial, or family ties with members of the Board of Commissioners, members of the Board of Directors, or major and controlling shareholders.*
Kepemilikan Saham *Share Ownership*	Tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic.	*Does not hold any shares in either Bank Sahabat Sampoerna or any other company affiliated with the Sampoerna Strategic Group.*

Kualifikasi dan Sertifikasi Profesi Audit 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.

Bank juga 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:

Internal Audit Professional Qualifications and Certifications

Bank Sahabat Sampoerna has ensured that all auditors who are part of the Internal Audit Unit have met the qualifications in accordance with Bank Indonesia Regulation No. 12/7/PBI/2010 regarding Risk Management Certification for Directors and Officers of Commercial Banks and Circular Letter No. 28/SEOJK.03/2022 regarding Risk Management Certification for Commercial Bank Human Resources.

The Bank also conducts equivalence and alignment of the Risk Management Certifications held by the Internal Audit Unit to comply with the provisions of Circular Letter No. 28/SEOJK.03/2022 regarding Risk Management Certification for Bank Human Resources, the implementation of which will be adjusted to the organizer's schedule.

The Bank ensures that all personnel in the Internal Audit Division possess the necessary qualifications and competencies in the field of auditing, and have obtained several national and international professional certifications. The professional qualifications and certifications held by Internal Audit personnel are as follows:

Kualifikasi/Sertifikasi *Qualifications/Certifications*	**Jumlah** *Total*
Sertifikasi *Qualified Internal Auditor* (QIA) *Qualified Internal Auditor (QIA) Certification*	1 orang *1 person*
Badan Sertifikasi Manajemen Risiko (BSMR) Jenjang 4 *Level 4 Risk Management Certification Agency (BSMR)*	27 orang *27 people*
Badan Sertifikasi Manajemen Risiko (BSMR) Jenjang 7 *Level 7 Risk Management Certification Body (BSMR)*	1
Skema Sertifikasi Auditor - Kualifikasi IV KKNI *Auditor Certification Scheme - KKNI Level IV Qualification*	19 orang *19 people*

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.

In conducting its duties and responsibilities, the Internal Audit Unit always acts professionally and with due care, and prioritizes independence. This commitment is demonstrated by the absence of any familial relationships up to the second degree, whether vertical or horizontal, with Shareholders, members of the Board of Commissioners, members of the Board of Directors, and auditors outside the Internal Audit Unit.

Kode Etik Auditor

Satuan Kerja Audit Internal menjalankan tugas dan tanggung jawabnya dengan berpedoman pada Kode Etik Auditor sebagaimana telah dijelaskan dalam Piagam Internal Audit yang terdiri dari:

Auditor Code of Conduct

The Internal Audit Unit carries out its duties and responsibilities in accordance with the Auditor Code of Conduct as outlined in the Internal Audit Charter, which consists of:

Menjaga Integritas	*Maintaining Integrity*
• Memiliki integritas dan perilaku yang professional, independent, dan objektif • Melakukan pekerjaan dengan kejujuran, ketekunan, dan bertanggung jawab • Mematuhi perundang-undangan dan peraturan profesi yang berlaku • Tidak menyalahgunakan wewenang yang dimiliki untuk kepentingan pribadi • Tidak menyalahgunakan asset-aset perusahaan untuk kepentingan pribadi • Tidak dengan sengaja menjadi bagian aktivitas illegal atau ikut serta dalam aktivitas yang tidak terpuji bagi profesi Audit Intern dan Organisasi • Menghormati dan berkontribusi mempertahankan tujuan perusahaan yang sah dan etis	• *Possessing integrity and behaving in a professional, independent, and objective manner* • *Performing work with honesty, diligence, and a sense of responsibility* • *Complying with applicable laws and professional regulations* • *Not abusing one's authority for personal gain* • *Not misusing company assets for personal gain* • *Not intentionally engaging in illegal activities or participating in activities that are unbecoming of the Internal Audit profession and the Organization* • *Respecting and contributing to the maintenance of the company's legitimate and ethical objectives*
Menjaga Objektivitas	*Maintain objectivity*
• Dapat mengemukakan temuan berdasarkan bukti-bukti atau fakta-fakta yang dapat dipertanggungjawabkan melalui hasil laporan yang lengkap dalam melakukan proses audit yang tercermin melalui laporan yang lengkap, objektif serta berdasarkan analisis yang cermat dan tidak memihak • Menghindari bias dan benturan kepentingan (conflict of interest) atau objek atau kegiatanyang diperiksanya, baik yang actual atau yang potensial • Menyampaikan kepada Chief Internal Auditor atau pihak terkait sebelum penugasan diterima, apabila memiliki potensi kendala independensi atau objektifitas agar tidak diberikan penugasan terhadap objek atau kegiatan dimaksud, termasuk menolak penugasan yang pernah menjadi tanggung jawabnya pada tahun sebelumnya • Dapat memberikan jasa konsultasi terhadap kegiatan yang sebelumnya pernah menjadi tanggung jawabnya • Dapat memberikan jasa assurance untuk aktivitas yang sebelumnya telah mendapatkan jasa konsultasi, selama tidak memiliki potensi kendala objektifitas. Jika ada kendala tersebut telah dikelola pada saat penugasan • Penugasan jasa assurance yang dilakukan terhadap aktivitas yang pernah menjadi tanggung jawab Chief Internal Auditor, harus diawasi pihak lain diluar aktivitas Audit Intern • Tidak menerima apapun yang dapat mempengaruhi penilaian profesionalnya • Tidak menyembunyikan fakta yang diketahui atau mengubah laporan aktivitas yang sedang diperiksa	• *Be able to present findings based on verifiable evidence or facts through comprehensive audit reports, reflecting a thorough audit process characterized by reports that are complete, objective, and grounded in careful and impartial analysis* • *Avoiding bias and conflicts of interest regarding the objects or activities being examined, whether actual or potential* • *Notifying the Chief Internal Auditor or relevant parties prior to accepting an assignment if there is a potential conflict regarding independence or objectivity, to ensure the individual is not assigned to audit the subject matter or activity in question, including declining assignments that were previously under their responsibility in the prior year* • *May provide consulting services for activities that were previously under its responsibility* • *May provide assurance services for activities that previously received consulting services, provided there is no potential conflict of interest. If such a conflict exists, it must be managed at the time of the engagement* • *Assignments of assurance services conducted on activities that were previously the responsibility of the Chief Internal Auditor must be supervised by a party outside the Internal Audit function* • *Must not accept anything that could influence their professional judgment* • *Must not conceal known facts or alter reports of activities under review*
Menjaga Kerahasiaan	*Maintain Confidentiality*
• Menggunakan dan melindungi informasi dan/atau data perusahaan terkait pelaksanaan tugas dan tanggung jawab Audit Intern kecuali diwajibkan berdasarkan peraturan perundang-undangan atau penetapan/putusan pengadilan • Tidak menggunakan informasi untuk kepentingan pribadi atau kepentingan lain yang dapat bertentangan dengan hukum atau tujuan organiasi	• *Use and protect company information and/or data related to the performance of internal audit duties and responsibilities, except as required by law or court orders* • *Not using information for personal gain or other interests that may conflict with the law or the organization's objectives*
Memelihara Independensi	*Maintaining Independence*
SKAI memiliki independensi dalam melakukan aktivitas Audit Intern dan Aktivitas pemeriksaan, mengemukakan pandangan serta pemikiran sesuai dengan profesinya dan standar yang berlaku • Mampu mengungkapkan pandangan dan pemikirannya tanpa pengaruh ataupun tekanan dari pihak lain manapun • Menerapkan metode scope,cara, Teknik, dan pendekatan audit sesuai dengan standar profesi dan standar audit yang berlaku umum serta menyesuaikannya dengan situasi di lapangan • Tidak diperkenankan merangkap tugas dan jabatan atau melakukan kegiatan yang bersifat operasional maupun afiliasinya, diluar aktivitas Audit intern • Memiliki kebebasan untuk menentukan klien yang akan diperiksa, berdasarkan standar review dan proses yang telah ditetapkan oleh SKAI • Menjaga independensi apabila diminta untuk memberikan layanan konsultasi atau tugas khusus, pemberian layanan konsultasi oleh SKAI kepada pihak intern Bank tetap memperhatikan aspek independensi	*Internal Audit Unit maintains independence in conducting Internal Audit and examination activities, expressing views and opinions in accordance with its profession and applicable standards* • *Being able to express views and thoughts without influence or pressure from any other party* • *Applying audit methods, procedures, techniques, and approaches in accordance with professional standards and generally accepted auditing standards, and adapt them to the situation on the ground* • *Not permitted to hold concurrent roles or positions, or to engage in operational activities or those of affiliated entities, outside the scope of internal audit activities* • *Having the freedom to determine which clients to audit, based on review standards and processes established by SKAI* • *Maintaining independence when requested to provide consulting services or perform special assignments; the provision of consulting services by SKAI to internal parties of the Bank must still uphold independence*

Tugas dan Tanggung Jawab Audit Internal

Berdasarkan Piagam Internal Audit, tugas dan tanggung jawab Satuan Kerja Audit Internal, antara lain:

1. Menyusun dan melaksanakan 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, dan Komite Audit, berdasarkan urgency (kepentingan) dan indikasi tertentu.
3. Menguji dan mengevaluasi pelaksanaan pengendalian internal dan system manajemen risiko sesuai dengan ketentuan Perusahaan dan Standar Profesional Practices serta ketentuan regulator dan Standar Profesional Audit Intern (Standar Pelaksanaan Audit Intern secara Profesional)
4. Melakukan pemeriksaan dan penilaian atas efisiensi dan efektivitas dibidang keuangan, akuntansi, operasional, sumber daya manusia, pemasaran, teknologi informasi, dan kegiatan lainnya
5. Memberikan rekomendasi perbaikan atas hasil audit dan informasi yang objektif tentang kegiatan yang diperiksa, serta membuat dan menyampaikan laporan atas hal tersebut.
6. 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 & Manajemen Risiko.
7. Melakukan monitoring dan analisa kecukupan tindak lanjut perbaikan hasil audit, baik temuan internal, eksternal, dan *management letter*.
8. Melakukan pendalaman dari hasil pemeriksaan 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
9. Memastikan kebenaran Laporan Keuangan Bank dengan melakukan review terhadap Laporan Publikasi Bank secara kuartalan dan melaporkan kepada Komite Audit.
10. Meningkatkan kompetensi dan profesionalitas staf audit dari aspek pengetahuan, keterampilan, dan pengalaman yang diperlukan.

Duties and Responsibilities of Internal Audit

Based on the Internal Audit Charter, the duties and responsibilities of the Internal Audit Unit include:

1. *Developing and implementing the annual audit plan and budget allocation, and conducting internal audit activities with a focus on high-risk areas/activities, as well as evaluating existing procedures to ensure that the Bank's objectives can be achieved optimally and sustainably.*
2. *The implementation of the annual audit plan and budget allocation must be approved by the President Director and the Board of Commissioners, taking into account the recommendations of the Audit Committee and other surprise/ad hoc assignments as requested by the Board of Commissioners, the Board of Directors, and the Audit Committee, based on urgency (importance) and specific indications.*
3. *Testing and evaluating the implementation of internal controls and risk management systems in accordance with Company policies, Professional Practice Standards, regulatory requirements, and the Standards for the Professional Practice of Internal Auditing*
4. *Conducting examinations and assessments of the efficiency and effectiveness of financial, accounting, operational, human resources, marketing, information technology, and other activities*
5. *Providing recommendations for improvements based on audit findings and objective information regarding the activities examined, as well as preparing and submitting reports on such matters.*
6. *Prepare audit reports on completed tasks and a summary of the top ten risks identified during the audit to be submitted to relevant parties, including the Board of Commissioners or the President Director. Additionally, copies of the reports are submitted to the Board of Commissioners, the Audit Committee, and the Compliance & Risk Director.*
7. *Monitoring and analyzing the adequacy of follow-up actions on audit findings, including internal, external, and management letter findings.*
8. *Conducting in-depth investigations of audit findings or special audits if there is a suspicion of fraud or violations of applicable laws and regulations; reporting and communicating information regarding suspected fraud (fraud) identified during the audit process; and following up in accordance with the Anti-Fraud & Investigation Policy*
9. *Ensuring the accuracy of the Bank's financial statements by conducting quarterly reviews of the Bank's published reports and reporting to the Audit Committee.*
10. *Enhancing the competence and professionalism of audit staff in terms of the necessary knowledge, skills, and experience.*

11. 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.
7. Menyelenggarakan rapat secara berkala dan insidental dengan Dewan Komisaris, Direksi, serta Komite Audit.
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.
9. Memilih object, menentukan frekuensi, dan cakupan kegiatan yang diperlukan untuk mencapai tujuan audit.
10. Meminta bantuan dari personil unit lain (sesuai bidang pengetahuan yang diperlukan) untuk membantu tugas-tugas audit.
11. Melakukan aktivitas investigasi terhadap kasus/masalah pada setiap aspek dan unsur kegiatan yang terindikasi terjadinya pelanggaran ketentuan perusahaan dan *fraud*.

11. Developing and implementing programs to evaluate and improve the quality of the Internal Audit Unit.

Furthermore, the Bank's Internal Audit Unit also has the authority to:
1. *Conduct internal audits of the activities of all operational units within the organization and its affiliates in accordance with applicable governance.*
2. *Communicate directly with the Board of Directors, including the Board of Commissioners, the President Director, and the Audit Committee.*
3. *Communicate and coordinate with external parties, including regulators and external auditors, as well as other parties relevant to SKAI's duties.*
4. *Coordinate activities with the External Auditor.*
5. *Convene and/or attend meetings with the Board of Directors, Management, the Audit Committee, and other committees as invited.*
6. *Attend strategic meetings without voting rights.*
7. *Convene regular and ad hoc meetings with the Board of Commissioners, the Board of Directors, and the Audit Committee.*
8. *Access all data, information, records, documents, and physical assets, including information management systems and relevant management meeting minutes regarding the Bank, as deemed necessary in connection with the duties and functions of SKAI.*
9. *Select audit subjects, determine the frequency, and scope of activities necessary to achieve the audit objectives.*
10. *Request assistance from personnel in other units (based on the required expertise) to support audit tasks.*
11. *Conduct investigative activities regarding cases/issues in every aspect and element of operations where violations of company regulations and fraud are suspected.*

Kebijakan dan Frekuensi Rapat

Sepanjang tahun 2025, Satuan Kerja Audit Internal telah menyelenggarakan sejumlah kegiatan maupun menyampaikan presentasi dalam rapat Dewan Komisaris, Direksi, dan Komite Audit, dengan frekuensi kehadiran sebagai berikut:

Meeting Policies and Frequency

Throughout 2025, the Internal Audit Unit has organized a number of activities and delivered presentations at meetings of the Board of Commissioners, the Board of Directors, and the Audit Committee, with the following attendance rates:

Uraian *Description*	**Rapat Dewan Komisaris** *Board of Commissioners Meetings*	**Rapat Direksi** *Board of Directors Meetings*	**Rapat Komite Audit** *Audit Committee Meetings*
Frekuensi Kehadiran *Attendance Frequency*	10	41	15

Pelaksanaan Tugas Audit Internal Tahun 2025

Implementation of Internal Audit Tasks in 2025

Pada tahun 2025, Satuan Kerja Audit Internal menginvestasikan biaya sebesar Rp 275 juta untuk melaksanakan pemeriksaan audit internal. Di samping itu, Satuan Kerja Audit Internal juga melaksanakan tugas dan tanggung jawabnya melalui sejumlah program sebagai berikut:

In 2025, the Internal Audit Unit allocated Rp 275 million to conduct internal audits. In addition, the Internal Audit Unit also conducted its duties and responsibilities through the following programs:

Program Kerja *Work Programs*	**Pelaksanaan** *Implementation*
Menyusun rencana audit tahunan dan alokasi anggaran untuk pelaksanaan fungsi audit internal tahun 2025. *Developing the annual audit plan and budget allocation for the implementation of the internal audit function in 2025.*	Satuan Kerja Audit Internal telah menyusun rencana audit tahunan dan alokasi anggaran berdasarkan penilaian risiko secara komprehensif untuk pelaksanaan fungsi audit internal tahun 2025 dan telah disetujui oleh Dewan Komisaris dan Direktur Utama dengan mempertimbangkan rekomendasi Komite Audit. *The Internal Audit Unit has prepared the annual audit plan and budget allocation based on a comprehensive risk assessment for the implementation of internal audit functions in 2025, and it has been approved by the Board of Commissioners and the President Director, taking into account the recommendations of the Audit Committee.*
Melaksanakan rencana audit tahunan 2025 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. *Implementing the 2025 annual audit plan approved by the Board of Commissioners and the President Director, taking into account the Audit Committee's recommendations, as well as performing other tasks in accordance with urgency or specific requests.*	Satuan Kerja Audit Internal telah melaksanakan pemeriksaan sebanyak 40 auditable unit dari total 38 plan yaitu 4 kantor cabang/area (kredit, operasional dan funding), 6 business support, 2 Treasury & Forex, 11 kantor pusat, dan 15 pemeriksaan dibidang informasi teknologi dan 2 Unplan yaitu 1 business support, 1 Kantor Pusat. *The Internal Audit Unit has conducted audits of 40 auditable units out of a total of 38 planned units, including 4 branch/area offices (credit, operations, and funding), 6 business support units, 2 Treasury & Forex units, 11 head offices, and 15 audits in the information technology sector, as well as 2 unplanned audits—1 business support unit and 1 head office.*
Membuat laporan hasil pemeriksaan atas tugas yang dilaksanakan untuk disampaikan kepada pihak-pihak yang berkepentingan termasuk Dewan Komisaris dan Direktur Utama. *Prepared audit reports on the tasks performed to be submitted to relevant parties, including the Board of Commissioners and the President Director.*	Hingga 31 Desember 2025, Satuan Kerja Audit Internal telah menyampaikan sebanyak 36 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. *As of December 31, 2025, the Internal Audit Unit has submitted a total of 36 audit reports to the relevant directors and discussed findings deemed significant with the Board of Commissioners through the Audit Committee. In addition, copies of the reports were submitted to the Board of Commissioners, the Audit Committee, and the Compliance & Risk Director.*

Temuan dan Tindak Lanjut

Findings and Follow-Up

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 2025 diungkapkan sebagai berikut:

The Internal Audit Unit continuously analyzes the data provided by each auditor. The results of this analysis are then submitted to the Board of Directors as findings requiring follow-up. The findings and follow-up actions resulting from the Internal Audit Unit's audits throughout 2025 are disclosed as follows:

Status	**Total Temuan** *Total Findings*	**Persentase (%)** *Percentage (%)*
Open	65	16%
Overdue	-	-
Closed	338	84%
Jumlah ***Total***	**403**	**100%**

Audit IT

Satuan Kerja Audit Internal juga bertugas untuk melakukan audit terhadap penggunaan teknologi informasi (TI). Pelaksanaan tugas audit TI yang dilaksanakan sejalan dengan Kebijakan Prosedur Audit Internal TI No. 09/058/BSS/SKAI/XI/2023 tanggal 1 November 2023.

Di tahun 2025, Bank telah melaporkan hasil audit TI kepada OJK yang terdiri dari:
1. LHPK
2. Security Audit - BI Payments and Fund Transfer System
3. Tematik Audit - Fitur baru Layanan Perbankan Elektronik
4. HC, Learning and Payroll Systems
5. Customer Communication Systems
6. Credit Channeling and Digital Lending Systems
7. Organisasi dan Manajemen
8. Pengembangan, Pengadaan dan Pemeliharaan
9. Procurement, Budgeting, Finance and Accounting Systems
10. Onboarding, KYC and APU PPT Systems
11. SWIFT System
12. Pengamanan Informasi dan Ketahanan Cyber
13. Regulatory Reporting Systems – LPS
14. ISO
15. Regulatory Reporting Systems - CIF and SLIK

IT Audit

The Internal Audit Unit is also responsible for conducting audits of information technology (IT) usage. The implementation of IT audit tasks is conducted in accordance with the IT Internal Audit Policy and Procedures No. 09/058/BSS/SKAI/XI/2023 dated November 1, 2023.

In 2025, the Bank reported the results of the IT audit to the OJK, which consisted of:
1. *LHPK*
2. *Security Audit - BI Payments and Fund Transfer System*
3. *Thematic Audit - New Features in Electronic Banking Services*
4. *HC, Learning, and Payroll Systems*
5. *Customer Communication Systems*
6. *Credit Channeling and Digital Lending Systems*
7. *Organization and Management*
8. *Development, Procurement, and Maintenance*
9. *Procurement, Budgeting, Finance, and Accounting Systems*
10. *Onboarding, KYC, and APU PPT Systems*
11. *SWIFT System*
12. *Information Security and Cyber Resilience*
13. *Regulatory Reporting Systems – LPS*
14. *ISO*
15. *Regulatory Reporting Systems - CIF and SLIK*

Pengembangan Kompetensi

Untuk menunjang Satuan Kerja Audit Internal dalam melaksanakan tugas dan tanggung jawabnya, Bank Sahabat Sampoerna memberikan kesempatan kepada Satuan Kerja Audit Internal untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal maupun pihak eksternal. Adapun program pengembangan kompetensi yang diikuti oleh Satuan Kerja Audit Internal di tahun 2025 adalah sebagai berikut:

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 2025, Satuan Kerja Audit Internal telah mengikuti sejumlah kegiatan pengembangan kompetensi, di antaranya:

Competency Development

To support the Internal Audit Unit in performing its duties and responsibilities, Bank Sahabat Sampoerna provides the Internal Audit Unit with opportunities to participate in training and competency development programs, whether organized internally or by external parties. The competency development programs participated in by the Internal Audit Unit in 2025 are as follows:

Bank Sahabat Sampoerna consistently facilitates the Internal Audit Unit's participation in activities competency development to broaden understanding of the performance of duties and responsibilities. Throughout 2025, the Internal Audit Unit has participated in a number of competency development activities, including:

Topik Pelatihan *Training Topics*	**Penyelenggara** *Organizer*	**Tanggal Pelatihan** *Training Date*
Navigating GRC : Key Insight and Comparisons Between EU and Indonesia	IIAC	15 Januari 2525 *January 15, 2025*
Meningkatkan Integritas Pelaporan Keuangan : Identifikasi Akun Signifikan & Memperkuat Pengawasan ICoFR Perbankan *Enhancing Financial Reporting Integrity: Identifying Significant Accounts & Strengthening Banking ICoFR Oversight*	Vedapraxis	12 Februari 2025 *February 12, 2025*
Strengthening Third Party Oversight : Internal Audit's Roles and Fraud Prevention Strategy	IAIB	19 Februari 2025 *February 19, 2025*

Topik Pelatihan *Training Topics*	**Penyelenggara** *Organizer*	**Tanggal Pelatihan** *Training Date*
Peran & Tanggung Jawab Internal Audit dalam Perlindungan Data Pribadi *The Role & Responsibilities of Internal Audit in Personal Data Protection*	IAIB	25 Februari 2025 *February 25, 2025*
Ensuring Effective and Efficient Business Processes	YPIA	12-13 Maret 2025 *March 12–13, 2025*
Analisis Data dengan Excel *Data Analysis with Excel*	Skillmahir	22-23 dan 29 Maret 2025 *March 22–23 and 29, 2025*
Digitalisasi Perbankan dari Dua Sudut Pandang *Banking Digitalization from Two Perspectives*	OJK	23 Juni 2025 *June 23, 2025*
Agentic AI In Finance : New Era Of Autonomous Decision Making (OJK)	OJK	3 Juli 2025 *July 3, 2025*
Keamanan Digital Banking serta Mencegah dan mendeteksi potensi fraud digital *Digital Banking Security and Preventing and Detecting Potential Digital Fraud*	One Point Indonesia	17 dan 20 Oktober 2025 *October 17 and 20, 2025*
Cybersecurity Bootcamp	PT. Systech Global Informasi	21-24 Oktober 2025 *October 21–24, 2025*
ICOFR	YPIA	30-31 Oktober 2025 *October 30–31, 2025*
Training VBA Basic Intermediate	Sigma Training	6-7 November 2025 *November 6–7, 2025*
Risk Management : Good Market & Liquidity Risk Strategy & Controlling	KeyPro	12-13 November 2025 *November 12–13, 2025*
Sosialisasi LHPK SP FMI BI dan KPDHN *Outreach on BI's SP FMI LHPK and KPDHN*	BI	27 November 2025 *November 27, 2025*

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, Penerapan Fungsi Audit Intern pada tahun 2025 berhasil memperoleh nilai komposit 1 atau "Low". Hasil penilaian ini telah diungkapkan pada pembahasan mengenai Hasil *Self-Assessment* Tata Kelola Perusahaan (GCG) di dalam Laporan Tahunan ini.

Performance Evaluation of the Internal Audit Unit

Bank Sahabat Sampoerna regularly evaluates its Internal Audit Unit to assess the effectiveness of its performance throughout the fiscal year. This evaluation is conducted using the Corporate Governance (GCG) self-assessment method, with assistance from the Compliance Unit. The Bank's assessment criteria are based on POJK No. 17 of 2023 and SEOJK No. 13/SEOJK.03/2017 regarding the Implementation of Corporate Governance for Commercial Banks. The results of these assessments are subsequently reported to the Compliance & Risk Director.

Based on the results of the Corporate Governance (GCG) self-assessment conducted, the Implementation of the Internal Audit Function in 2025 received a composite score of 1, or "Low." These assessment results have been disclosed in the section on Corporate Governance (GCG) Self-Assessment Results in this Annual Report.

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 Audit Internal Bank harus segera disampaikan kepada Otoritas Jasa Keuangan.

Mechanism for the Appointment and Dismissal of the Head of the Internal Audit Unit

The process of appointing and dismissing the Head of the Internal Audit Unit is the authority of President Director and is approved by the Bank's Board of Commissioners, taking into account the recommendations of the Audit Committee. The appointment and dismissal of the Head of the Bank's Internal Audit Unit must be immediately reported to the Financial Services Authority.

Sistem Pengendalian Internal

Internal Control System

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.

The internal control system is a monitoring mechanism established by the Bank's management on an ongoing basis, the quality of whose design and implementation is influenced by the Board of Commissioners, the Board of Directors, and all officers and employees of the Bank, designed to provide reasonable assurance for:

1. *Safeguard and secure the Bank's assets;*
2. *Ensure the availability of accurate and reliable financial and managerial reporting;*
3. *Enhance the Bank's compliance with applicable laws and regulations;*
4. *Minimize the financial impact or consequences of losses, irregularities—including fraud—and breaches of prudential standards; and*
5. *Improve organizational effectiveness and cost efficiency.*

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.

The Internal Control System was established in accordance with SEOJK No. 35/SEOJK.03/2017 regarding Guidelines on Internal Control System Standards for Commercial Banks dated July 7, 2017, and has since been adapted to the Bank's organizational structure, which continues to be refined. Furthermore, the implementation of the internal control system is aligned with the company's values and culture as embodied in the 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.

The Bank consistently maximizes the implementation of the internal control system to ensure business continuity and achieve established objectives through the following efforts:

1. *Developing an internal control system framework that can serve as a guideline for every employee in implementing the internal control system in accordance with their respective job descriptions.*
2. *Implementing controls and delegating functions at all functional levels, in accordance with the Bank's organizational structure.*
3. *Implementing risk management accounting, information, and communication systems in accordance with applicable regulations and laws so that the Bank is able to adequately facilitate the implementation of a comprehensive risk management process.*

Kesesuaian Pengendalian Internal dengan Peraturan Otoritas Jasa Keuangan

Compliance of Internal Controls with Financial Services Authority Regulations

Bank Sahabat Sampoerna memastikan bahwa seluruh kerangka pengendalian internal atas pelaporan keuangan telah selaras dengan Peraturan Otoritas Jasa Keuangan

Bank Sahabat Sampoerna ensures that its entire internal control framework for financial reporting is in compliance with Regulation No. 15 of 2024 of the Financial Services

Republik Indonesia Nomor 15 Tahun 2024 tentang Integritas Pelaporan Keuangan Bank. Kesesuaian ini diwujudkan melalui penguatan struktur pengendalian yang mencakup aspek tata kelola, proses bisnis, sistem informasi, serta fungsi pengawasan, sehingga mampu menjamin bahwa setiap informasi keuangan disusun secara andal, akurat, dan dapat dipertanggungjawabkan.

Authority of the Republic of Indonesia on the Integrity of Bank Financial Reporting. 's compliance is achieved through the strengthening of its control structure, which encompasses governance, business processes, information systems, and oversight functions, thereby ensuring that all financial information is prepared reliably, accurately, and in a manner that can be accounted for.

Implementasi pengendalian dilakukan secara menyeluruh pada level entitas maupun aktivitas operasional, dengan menitikberatkan pada identifikasi dan mitigasi risiko yang berpotensi memengaruhi kualitas pelaporan keuangan. Bank secara berkala melakukan penelaahan atas desain dan efektivitas pengendalian, termasuk penyesuaian terhadap ketentuan terbaru yang diatur dalam regulasi. Proses ini didukung oleh dokumentasi yang memadai, pengujian kontrol yang terstruktur, serta mekanisme tindak lanjut yang disiplin atas setiap temuan.

Controls are implemented comprehensively at both the entity and operational activity levels, with a focus on identifying and mitigating risks that could potentially affect the quality of financial reporting. The Bank periodically reviews the design and effectiveness of controls, including adjustments to comply with the latest regulatory requirements. This process is supported by adequate documentation, structured control testing, and a disciplined follow-up mechanism for every finding.

Dalam memastikan kepatuhan yang berkelanjutan, Bank memperkuat peran fungsi Kepatuhan, Manajemen Risiko, dan Audit Internal sebagai lini pengawasan yang independen dan objektif. Sinergi antar fungsi tersebut memastikan bahwa seluruh kebijakan dan prosedur yang diterapkan tidak hanya memenuhi ketentuan regulator, tetapi juga efektif dalam menjaga integritas proses pelaporan keuangan.

To ensure ongoing compliance, the Bank has strengthened the roles of the Compliance, Risk Management, and Internal Audit functions as independent and objective oversight bodies. Synergy among these functions ensures that all policies and procedures implemented not only meet regulatory requirements but are also effective in maintaining the integrity of the financial reporting process.

Selain itu, Bank secara aktif meningkatkan pemahaman dan kompetensi seluruh insan perusahaan melalui sosialisasi regulasi, pelatihan teknis, serta integrasi prinsip-prinsip pengendalian ke dalam budaya kerja. Upaya ini bertujuan untuk membangun kesadaran kolektif bahwa integritas pelaporan keuangan merupakan tanggung jawab bersama di seluruh lini organisasi.

In addition, the Bank actively works to enhance the understanding and competence of all employees through regulatory outreach, technical training, and the integration of control principles into the work culture. These efforts aim to foster a collective awareness that financial reporting integrity is a shared responsibility across all levels of the organization.

Melalui penerapan yang konsisten dan berkesinambungan, Bank Sahabat Sampoerna menegaskan komitmennya dalam memenuhi ketentuan POJK No. 15 Tahun 2024 sekaligus memperkuat kualitas tata kelola perusahaan. Kesesuaian ini menjadi landasan penting dalam menjaga transparansi, meningkatkan kepercayaan pemangku kepentingan, serta mendukung pertumbuhan Bank yang sehat dan berkelanjutan.

Through consistent and continuous implementation, Bank Sahabat Sampoerna reaffirms its commitment to complying with the provisions of POJK No. 15 of 2024 while strengthening the quality of its corporate governance. This compliance serves as a crucial foundation for maintaining transparency, enhancing stakeholder trust, and supporting the Bank's healthy and sustainable growth.

Komitmen Terhadap Penerapan Internal Control over Financial Reporting (ICOFR)

Commitment to the Implementation of Internal Control over Financial Reporting (ICOFR)

Bank Sahabat Sampoerna secara konsisten memperkuat penerapan *Internal Control over Financial Reporting* (ICOFR) sebagai bagian dari tata kelola yang terintegrasi, guna memastikan pelaporan keuangan yang akurat, transparan, dan andal. Pendekatan ini dibangun secara sistematis dan melekat pada seluruh proses bisnis, dengan penekanan pada keselarasan antara desain pengendalian, profil risiko, serta dinamika model bisnis Bank.

Bank Sahabat Sampoerna consistently strengthens the implementation of Internal Control over Financial Reporting (ICOFR) as part of its integrated governance framework, to ensure accurate, transparent, and reliable financial reporting. This approach is systematically built into all business processes, with an emphasis on aligning control design, risk profiles, and the dynamics of the Bank's business model.

Sejalan dengan penerapan POJK No. 15 Tahun 2024 tentang Integritas Pelaporan Keuangan Bank, saat ini telah diwujudkan melalui beberapa inisiatif utama dimana Bank telah membentuk unit kerja khusus di bawah Satuan Kerja Manajemen Risiko yang berfokus pada pencegahan kecurangan dan manipulasi dalam informasi keuangan. Selain itu, Bank juga melakukan penyempurnaan kebijakan ICOFR sebagai kerangka acuan pengendalian yang lebih komprehensif.

In line with the implementation of POJK No. 15 of 2024 on the Integrity of Bank Financial Reporting, the Bank has taken several key initiatives, including the establishment of a dedicated unit under the Risk Management Division focused on preventing fraud and manipulation of financial information. In addition, the Bank has refined its ICOFR policy to serve as a more comprehensive control framework.

Penguatan implementasi dilakukan melalui pemetaan proses bisnis (*Business Process Mapping*) bersama konsultan untuk mengidentifikasi proses yang berdampak terhadap pelaporan keuangan, serta penyusunan *Risk Control Matrix* (RCM) guna memastikan kecukupan titik kendali dan mitigasi atas potensi risiko. Selanjutnya, Bank juga telah mengembangkan Control Self Assessment (CSA) yang digunakan oleh unit kerja sebagai lini pertama untuk menilai efektivitas pengendalian secara berkala.

The implementation was strengthened through business process mapping conducted in collaboration with consultants to identify processes that impact financial reporting, as well as the development of a Risk Control Matrix (RCM) to ensure the adequacy of control points and mitigation measures for potential risks. Furthermore, the Bank has also developed a Control Self-Assessment (CSA) that is used by business units as the first line of defense to periodically assess the effectiveness of controls.

Efektivitas pengendalian dievaluasi secara berkelanjutan melalui sinergi antara *Risk Taking Unit*, Satuan Kerja Manajemen Risiko, dan Satuan Kerja Audit Intern, serta didukung oleh peningkatan kapabilitas internal melalui program literasi dan pelatihan pengendalian. Pendekatan ini memberikan keyakinan memadai bahwa seluruh mekanisme pengendalian telah berjalan efektif dalam menjaga integritas pelaporan keuangan.

The effectiveness of controls is continuously evaluated through collaboration between the Risk-Taking Unit, the Risk Management Unit, and the Internal Audit Unit, and is supported by enhanced internal capabilities through control literacy and training programs. This approach provides reasonable assurance that all control mechanisms are functioning effectively to maintain the integrity of financial reporting.

Dengan fondasi pengendalian yang semakin kuat, Bank terus berkomitmen untuk menjaga kualitas pelaporan keuangan sebagai pilar utama dalam membangun kepercayaan pemangku kepentingan dan mendukung pertumbuhan usaha yang sehat dan berkelanjutan.

With an increasingly robust control foundation, the Bank remains committed to maintaining the quality of financial reporting as a key pillar in building stakeholder trust and supporting healthy and sustainable business growth.

Sejalan dengan penerapan POJK No 15 Tahun 2024 tentang Integritas Pelaporan Keuangan Bank, Dewan Komisaris memantau langkah Direksi dalam memperkuat integritas laporan keuangan melalui pengembangan *Internal Control over Financial Reporting* (ICOFR), dimana saat ini Bank berada pada tahap:

1. Telah terbentuk unit kerja khusus yang bertanggung jawab terhadap pencegahan kecurangan atau manipulasi dalam Informasi Keuangan dan/atau Laporan Keuangan Bank Umum yang berada dibawah Satuan Kerja Manajemen Risiko.
2. Penyempurnaan terhadap kebijakan ICOFR sebagai acuan pengendalian pelaporan keuangan.
3. Telah dilakukan pemetaan proses bisnis yang relevan melalui *Business Process Mapping* (BPM) bersama konsultan untuk mengidentifikasi alur kerja yang mempengaruhi pelaporan keuangan serta penyusunan *Risk Control Matrix* (RCM) untuk memetakan titik kendali dan potensi celah pengendalian yang perlu dimitigasi.
4. Telah dilakukan pembuatan template *Control Self Assessment* (CSA) berkoordinasi antara unit kerja khusus dengan unit kerja yang terkait sebagai lini

In line with the implementation of POJK No. 15 of 2024 on the Integrity of Bank Financial Reporting, the Board of Commissioners monitors the Board of Directors' efforts to strengthen the integrity of financial reports through the development of Internal Control over Financial Reporting (ICOFR), with the Bank currently at the following stage:

1. *A dedicated unit has been established under the Risk Management Division to prevent fraud or manipulation in the financial information and/or financial statements of commercial banks.*
2. *Refinement of the ICOFR policy as a guideline for financial reporting controls.*
3. *Relevant business processes have been mapped using Business Process Mapping (BPM) in collaboration with consultants to identify workflows that impact financial reporting, as well as to develop a Risk Control Matrix (RCM) to map control points and potential control gaps that need to be mitigated.*
4. *A Control Self-Assessment (CSA) template has been developed through coordination between the dedicated unit and the relevant units serving as the first line of*

pertama untuk menilai dan memastikan efektivitas pengendalian internal yang dilakukan oleh masing-masing unit kerja.

defense to assess and ensure the effectiveness of internal controls implemented by each unit.

Dewan Komisaris menilai bahwa inisiatif ini merupakan pondasi penting dalam memastikan keandalan pelaporan keuangan, serta mendorong Direksi untuk menyelesaikan implementasinya sesuai Rencana Bisnis Bank dengan evaluasi dan perbaikan berkelanjutan.

The Board of Commissioners believes that this initiative is a crucial foundation for ensuring the reliability of financial reporting, and encourages the Board of Directors to complete its implementation in accordance with the Bank's Business Plan, with ongoing evaluation and improvement.

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

Scope of Internal Control

As stated in the Internal Control System (ICS) Framework Memo No. 09/05/MI/SKMR/V/18, the scope of work within the Internal Control System encompasses 5 (five) interrelated key elements, namely:

1. *Management Oversight and Control Culture*
    a. *The duties and responsibilities of the Board of Commissioners regarding the internal control system include:*
        - *Monitoring the overall implementation of internal controls, including Board policies that establish internal controls;*
        - *Ensuring that issues at the Bank that could reduce the effectiveness of the internal control system are addressed; and*
        - *Conducting periodic reviews of the implementation of internal controls and validating the Bank's strategy regarding the established internal controls.*

    b. *The duties and responsibilities of the Board of Directors regarding the internal control system include:*
        - *Establishing and maintaining a robust and effective internal control system;*
        - *Ensuring the system operates securely and reliably, in accordance with the Bank's established internal control objectives;*
        - *Establishing policies and strategies, internal control procedures, and the " " framework, as well as monitoring the adequacy and effectiveness of the internal control system; and*
        - *The director in charge of compliance must play an active role in preventing management from deviating from the principle of prudence when establishing policies.*

    c. *The Board of Commissioners and the Board of Directors exercise active oversight through the formulation and implementation of business strategies, the development and application of risk management, organizational structuring and the delegation of authority with clear accountability, the development of internal control policies, and the monitoring of the adequacy and effectiveness of the established internal control system. The Board of Commissioners and the Board of Directors are committed to ensuring that the development of the Bank's work environment is well-managed. In this*

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.

regard, the Board of Commissioners and the Board of Directors strive to enhance high work ethics and integrity and to foster an organizational culture that instills in all employees an understanding of the importance of the internal controls in place at 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.

2. Risk Identification and Assessment
Risk identification, analysis, and assessment are a series of actions conducted by the Board of Directors. However, to ensure that the scope of the audit is broader and more comprehensive, risk assessment is delegated to the Internal Audit Unit, taking into account both internal and external factors, and is conducted at the entity or activity level.

The implementation of the identification and assessment of risks inherent in operational activities The Bank conducts risk assessments on an ongoing basis, both individually and on an aggregate basis, which can affect the achievement of objectives. Risk assessments can identify the types of risks faced by the Bank, both individual and aggregate risks, establish risk limits, and determine risk control techniques.

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

3. Operational Control Activities and Segregation of Duties

Control activities involve all Bank employees, including the Board of Directors. Control activities are planned and implemented to manage identified risks. These activities include establishing control policies and procedures, as well as early verification processes to ensure that policies and procedures are consistently followed. These control activities are an integral part of every function and the Bank's day-to-day operation.

Control activities include policies, procedures, and practices that provide assurance to the Bank's officers and employees that the directives of the Board of Commissioners and the Board of Directors have been effectively implemented. Control activities can assist the Board of Directors, including the Bank's Commissioners, in managing and controlling risks that could affect the Bank's performance or result in 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 controls, physical asset controls, documentation of policies, systems, and procedures, the dual control principle, and provisions regarding mechanisms for reporting violations and sanctions for such violations.

An effective internal control system requires the separation of duties. This separation is intended to ensure that no employee, in their position, has the peluang untuk melakukan dan menyembunyikan kesalahan atau penyimpangan dalam pelaksanaan tugasnya pada seluruh jenjang organisasi dan seluruh langkah kegiatan operasional. Selain 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.

opportunity to commit and conceal errors or irregularities in the performance of their duties at all levels of the organization and throughout all operational steps. Furthermore, in an effective internal control system, the delegation of authority and responsibility could give rise to various conflicts of interest are avoided. All aspects that could lead to conflicts of interest are identified, minimized, and carefully monitored by an independent party.

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.

4. Accounting, Information, and Communication Systems
   The Bank's risk management accounting, information, and communication systems are organized in accordance with applicable regulations and laws. These systems must be capable of adequately facilitating the implementation of a comprehensive risk management process.

   The accounting system encompasses methods and records used to identify, group, analyze, classify, record, and report the Bank's transactions. The information system must be capable of generating reports on business activities, financial condition, risk management practices, and compliance with regulations that support the performance of the duties of the Board of Commissioners and the Board of Directors. The communication system must be capable of providing information to all parties, both internal and external, such as the Financial Services Authority, External Auditors, Shareholders, and the Bank's customers.

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.

5. Monitoring Activities and Corrective Actions for Deviations
   The Bank continuously monitors the overall effectiveness of its internal control implementation. Monitoring of key inherent risks must be prioritized in business and operational activities and integrated into the Bank's daily operations, including periodic evaluations conducted by both the Operational Units and the Internal Audit Unit.

   Continuous monitoring of the adequacy of the internal control system relates to changes in internal and external conditions. The Bank ensures that monitoring functions are clearly defined and well-structured within the Bank's organization, and integrates the internal control system into the Bank's operational activities so that monitoring activities can be conducted effectively.

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

Review of the Effectiveness of the Internal Control System

The Internal Audit Unit, as the third line of defense at Bank Sahabat Sampoerna, continuously assesses the effectiveness of the Internal Control System through risk-

kegiatan audit berbasis risiko. Guna memaksimalkan 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.

Satuan Kerja Audit Internal menilai bahwa hasil pemeriksaan terhadap efektivitas sistem pengendalian internal Bank pada tahun 2025 telah memadai untuk memitigasi risiko yang dapat mengganggu operasional Bank secara signifikan. Meski demikian, Satuan Kerja Audit Internal memandang bahwa masih terdapat beberapa aspek pengendalian yang dapat terus ditingkatkan dan dioptimalkan kembali sehingga pengendalian internal Bank Sahabat Sampoerna ke depan dapat menjadi lebih efektif dan efisien.

Pernyataan Direksi dan/atau Dewan Komisaris atas Kecukupan Sistem Pengendalian Internal

Dalam memastikan penerapan tata kelola perusahaan yang komprehensif, Dewan Komisaris dan Direksi ikut berperan aktif dalam 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. Ke depan, Bank berkomitmen untuk terus meningkatkan dan menyempurnakan kualitas penerapan sistem pengendalian internal yang dapat berperan dalam mendorong pencapaian kinerja Bank yang lebih baik secara jangka panjang.

based audits. To maximize the implementation of the internal control system, the Board of Commissioners and the Board of Directors have implemented various strategies, including:

1. *Continuously enhance understanding of risk culture across all levels of the organization through risk management awareness campaigns and training.*
2. *Formulating policies and procedures that support an effective internal control structure.*
3. *Conducting regular meetings with each division to evaluate the internal control system and minimize the likelihood of errors or violations that could result in losses.*
4. *Require all employees to read, understand, and comply with regulations or provisions, both internal and external, and conduct outreach through training and various Bank activities.*
5. *Enhancing the active role of the Compliance Unit, the Risk Management Unit, and the Internal Audit Unit as independent divisions within the Bank's operations.*
6. *Enhancing the role of the Audit Committee and the Risk Oversight Committee through regular meetings to monitor significant findings and high-risk findings.*

The Internal Audit Unit assesses that the results of the 2025 audit of the effectiveness of the Bank's internal control system are sufficient to mitigate risks that could significantly disrupt the Bank's operations. However, the Internal Audit Unit believes that there are still several control aspects that can be further improved and optimized so that Bank Sahabat Sampoerna's internal controls can become more effective and efficient in the future.

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

To ensure the implementation of comprehensive corporate governance, the Board of Commissioners and the Board of Directors play an active role in evaluating the implementation of the Bank's internal control system. Based on the results of the evaluation of the effectiveness and adequacy of the Bank's internal control system—specifically regarding the adequacy of systems, procedures, organizational structure, human resources, and reporting—the Board of Commissioners and the Board of Directors assess that the implementation of the Internal Control System at Bank Sahabat Sampoerna has been performed effectively and adequately, both in terms of infrastructure and methodology. Moving forward, the Bank is committed to continuously improving and refining the quality of its internal control system implementation, which can play a role in driving better long-term performance for the Bank.

Fungsi Kepatuhan

Compliance Function

Bank Sahabat Sampoerna menyadari bahwa perkembangan industri perbankan yang semakin kompleks serta persaingan bisnis yang ketat turut berdampak pada eksposur risiko usaha Bank. Untuk memastikan Bank dapat memitigasi risiko yang dapat dihadapi, Bank Sahabat Sampoerna membentuk fungsi kepatuhan yang berperan dalam mencegah penyimpangan dan memastikan seluruh kegiatan yang dilakukan oleh Bank telah sesuai dengan ketentuan dan perundang-undangan yang berlaku sehingga kinerja Bank menjadi yang lebih baik dan sehat.

Bank Sahabat Sampoerna recognizes that the increasingly complex development of the banking industry and intense business competition have an impact on the Bank's business risk exposure. To ensure the Bank can mitigate potential risks, Bank Sahabat Sampoerna has established a compliance function that plays a role in preventing violations and ensuring that all activities conducted by the Bank comply with applicable regulations and laws, thereby improving the Bank's performance and ensuring its financial health.

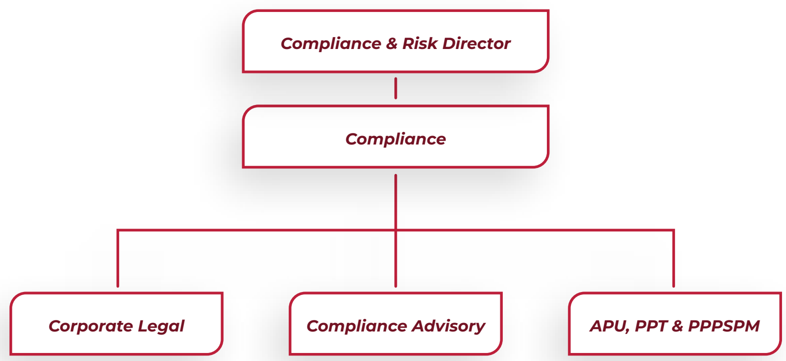
Kebijakan kepatuhan Bank telah disahkan oleh Direksi dan dituangkan dalam Kebijakan Umum Kepatuhan No.BSS/KU-KEP/SKK/02 tanggal 7 Mei 2024. Kebijakan tersebut telah disesuaikan dengan POJK No. 46/POJK.03/2017 tanggal 12 Juli 2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum dan POJK 17 tahun 2023 tentang Penerapan tata Kelola Bank Umum.

The Bank's compliance policy has been approved by the Board of Directors and is set forth in General Compliance Policy No. BSS/KU-KEP/SKK/02 dated May 7, 2024. This policy has been aligned with POJK No. 46/POJK.03/2017 dated July 12, 2017, regarding the Implementation of Compliance Functions in Commercial Banks, and POJK No. 17 of 2023 regarding the Implementation of Corporate Governance in Commercial Banks.

Struktur Organisasi Fungsi Kepatuhan

Organizational Structure of the Compliance Function

Kedudukan fungsi kepatuhan hingga tiga level di bawah Presiden Direktur
The compliance function is positioned up to three levels below the President Director



Pelaksanaan Fungsi Kepatuhan

Direktur yang Membawahi 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.

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.

Implementation of the Compliance Function

Director Overseeing the Compliance Function

The Bank has appointed the Compliance & Risk Director as the coordinator of the Bank's Compliance Function. The duties and responsibilities of Compliance Function Director include:

1. *Formulating strategies to foster the Bank's Compliance Culture.*
2. *Proposing compliance policies or principles to be established by the Board of Directors.*
3. *Establishing compliance systems and procedures to be used in developing the Bank's internal regulations and guidelines.*
4. *Ensuring that all policies, regulations, systems, and procedures, as well as business activities conducted by the Bank, comply with the regulations of the Financial Services Authority, Bank Indonesia, and applicable laws and regulations.*
5. *Minimizing the Bank's compliance risks.*
6. *Taking preventive measures to ensure that policies and/or decisions made by the Bank's Board of Directors do not deviate from the regulations of Bank Indonesia or the Financial Services Authority and applicable laws and regulations.*
7. *Performing other tasks related to compliance functions, namely:*
    a. *Ensuring the Bank's compliance with commitments made by the Bank to the Financial Services Authority and/or other authorized supervisory authorities; and*
    b. *Conducting outreach to all Bank employees regarding matters related to the compliance function, particularly regarding applicable regulations, and/or acting as a contact person for the Bank's compliance issues for both internal and external parties.*

Compliance Unit

The Compliance Unit is the entity responsible for carrying out the Bank's compliance functions, which include:

1. *Fostering a culture of compliance at all levels of the organization and in the company's business operations.*
2. *Managing compliance risks faced by the company.*
3. *Ensuring that the company's policies, regulations, systems, procedures, and business activities comply with the provisions of the Financial Services Authority and applicable laws and regulations.*
4. *Ensuring the company's compliance with commitments made to the Financial Services Authority and/or other competent supervisory authorities.*

Kedudukan Satuan Kerja Kepatuhan

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 2025, karyawan yang bertugas di Satuan Kerja Kepatuhan terdiri dari:

1. *Compliance Head*: 1 Orang
2. *Data Quality Monitoring &* CRMA: 2 Orang
3. *Governance Relationship*: 1 Orang
4. Compliance Digital & International Banking : 2 orang
5. APU, PPT & PPPSPM: 7 Orang
6. *Compliance Advisory*: 6 Orang

Position of the Compliance Unit

The Compliance Unit operates under the supervision of the Compliance & Risk Director. Consequently, the Compliance Unit's accountability for the performance of its duties is reported directly to the Bank's Compliance & Risk Director.

In 2025, the staff assigned to the Compliance Unit at consists of:

1. *Compliance Head: 1 person*
2. *Data Quality Monitoring & CRMA: 2 people*
3. *Governance Relationship: 1 person*
4. *Compliance Digital & International Banking: 2 people*
5. *AML-CTF & CPWMD: 7 people*
6. *Compliance Advisory: 6 People*

Profil Kepala Satuan Kerja Kepatuhan

Di tahun 2025, Kepala Satuan Kerja Kepatuhan dijabat oleh Emalia Indra Juanti. Penunjukan tersebut ditetapkan berdasarkan Surat Keputusan No. 001/HC_SK/BSS/III/2021. Adapun profil Kepala Satuan Kerja Kepatuhan Bank dapat dilihat sebagai berikut:

Profile of the Head of the Compliance Unit

In 2025, Emalia Indra Juanti was appointed Head of the Compliance Unit. The appointment was made pursuant to Decree No. 001/HC_SK/BSS/III/2021. The profile of the Bank's Head of the Compliance Unit is as follows:

Emalia Indra Juanti

Kepala Satuan Kerja Kepatuhan
Head of the Compliance Unit

Kewarganegaraan *Nationality*	Usia *Age*	Domisili *Domicile*
Indonesia *Indonesian*	53 Tahun *53 years old*	Jakarta, Indonesia

Dasar Hukum Pengangkatan *Legal Basis of Appointment*	Sejak 2021, berdasarkan Surat Keputusan No. 001/HC_SK/BSS/III/2021.	*Since 2021, pursuant to Decision Letter No. 001/HC_SK/BSS/III/2021.*
Riwayat Pendidikan *Educational Background*	• 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 *Expertise*	Hukum Legal	*Legal Law*
Sertifikasi Profesi *Professional Certification*	• Sertifikasi Kepatuhan Level 1 • Sertifikasi Manajemen Risiko Jenjang 5	• *Level 1 Compliance Certification* • *Level 5 Risk Management Certification*
Riwayat Pekerjaan *Work History*	• *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	• *Head of the Corporate Secretary and Compliance Division at PT Bank Sahabat Sampoerna (2020–2022)* • *Division Head of Corporate Secretary & Licensing at PT Bank Sahabat Sampoerna (2018–2020)* • *Division Head of Legal & Corporate Secretary at PT Bank Sahabat Sampoerna (2016–2018)* • *Division Head of Corporate Legal at PT Sahabat Sejati Kapital* • *General Counsel - Head of Legal, AXA Indonesia* • *Vice President of Legal at ABN AMRO Bank* • *Legal Manager at HSBC Indonesia*

Rangkap Jabatan *Concurrent Position*	Tidak memiliki rangkap jabatan di perusahaan lain di luar Grup Sampoerna Strategic.	*Does not hold any concurrent positions at other companies outside the Sampoerna Strategic Group*
Hubungan Afiliasi *Affiliation*	Tidak memiliki hubungan keuangan, kepengurusan, dan kekeluargaan dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.	*Does not have any financial, managerial, or family ties with members of the Board of Commissioners, members of the Board of Directors, or major and controlling shareholders.*
Kepemilikan Saham *Share Ownership*	Tidak memiliki saham, baik di Bank Sahabat Sampoerna ataupun perusahaan lain yang terafiliasi dengan Grup Sampoerna Strategic.	*Does not hold any shares in either Bank Sahabat Sampoerna or any other company affiliated with the Sampoerna Strategic Group.*

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.
6. Melakukan tugas lain terkait Fungsi Kepatuhan, antara lain:
   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

Responsibilities and Authorities of the Compliance Unit

The Compliance Unit carries out the following responsibilities:

1. *Taking steps to foster a culture of compliance across all of the Bank's business activities at every level of the organization, including through the development of work systems, programs, standard operating procedures (SOPs), implementation guidelines (Juklak), a Compliance Code of Conduct, and a compliance policy.*
2. *Identifying, measuring, monitoring, and controlling compliance risks in accordance with Financial Services Authority regulations governing the implementation of risk management for commercial banks.*
3. *Assessing and evaluating the effectiveness, adequacy, and suitability of the Bank's policies, regulations, systems, and procedures against applicable laws and regulations, including:*
   a. *Evaluate proposed policies, regulations, systems, and procedures; and*
   b. *Taking the initiative to improve policies, regulations, systems, and procedures based on the information obtained.*
4. *Conducting reviews and/or recommending updates and improvements to the Bank's policies, regulations, systems, and procedures to ensure compliance with Financial Services Authority (OJK) regulations and applicable laws and regulations.*
5. *Striving to ensure that the Bank's policies, regulations, systems, and procedures, as well as its business activities, comply with the regulations of the Financial Services Authority and applicable laws and regulations.*
6. *Performing other duties related to the Compliance Function, including:*
   a. *Ensuring the company's compliance with the commitments made by the Bank to the Financial Services Authority and/or other competent supervisory authorities;*
   b. *Conducting awareness sessions for all employees regarding matters related to compliance functions, particularly regarding applicable regulations; and/or*

c. Bertindak sebagai narahubung (*contact person*) untuk permasalahan kepatuhan perusahaan, baik pihak internal maupun eksternal.

c. Serving as the contact person for corporate compliance issues, both internally and externally.

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
4. 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.

In addition, the Compliance Unit also has the authority to:

1. *Build a comprehensive and up-to-date database of laws and regulations related to the Bank's business;*
2. *Distribute compliance references and disseminate them;*
3. *Serving as a point of contact for all employees regarding matters related to regulations and*
4. *legislation; Conducting compliance reviews of credit proposals for specific amounts, new products and/or activities, as well as policies and procedures prior to implementation;*
5. *Accessing all transaction evidence, records, and documents for review, if necessary;*
6. *Proactively identify compliance risks inherent in every transaction, including new transactions and/or transactions involving new products;*
7. *Monitor and provide feedback, suggestions, or clarifications regarding the Bank's practices; and*
8. *Act as a liaison between the Bank and regulatory authorities or other entities that establish 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 perba
5. Membentuk organisasi dan infrastruktur kepatuhan serta pengelolaan sumber daya lainnya agar tugas-tugas kepatuhan dilaksanakan dengan baik.

Responsibilities and Authorities of the Head of the Compliance Unit

The Head of the Compliance Unit has the responsibilities and authorities described as follows:

1. *Communicating any developments and changes in applicable laws and regulations that have a significant impact on the Bank, and advising the Board of Directors regarding applicable laws and regulations.*
2. *Developing practical guidelines for all employees to implement newly enacted laws and regulations.*
3. *Assessing the need to amend compliance management policies as necessary.*
4. *Monitoring and reporting to the Board of Commissioners and the Board of Directors, or to shareholders and the relevant authorities, on whether compliance has been implemented, including whether corrective actions*
5. *Establishing a compliance organization and infrastructure, as well as managing other resources, to ensure that compliance tasks are performed effectively.*

6. Menyusun suatu Program Kepatuhan (Compliance Program) yang terdiri dari rencana aktivitas yang akan dilakukan, meliputi implementasi dan peninjauan terhadap pelaksanaan peraturan tertentu, melakukan penilaian kepatuhan, dan pelaksanaan compliance testing. Penyusunan Compliance Program ini dilakukan berdasarkan risiko kepatuhan terbesar yang sedang dihadapi Bank.
7. Melakukan enforcement 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.

6. Developing a Compliance Program consisting of a plan of activities to be performed, including the implementation and review of specific regulations, conducting compliance assessments, and performing compliance testing. The development of this Compliance Program is based on the Bank's most significant compliance risks.

7. Enforcing compliance principles to ensure they are adhered to and implemented by all employees and organizational units within the Bank, including fostering commitment, establishing preventive measures, designing follow-up programs, and requiring relevant parties to implement them, as well as imposing sanctions in accordance with the Bank's applicable procedures and policies.

Pelaksanaan Tugas Satuan Kerja Kepatuhan

Implementation of the Compliance Unit's Duties

Pada tahun 2025, Satuan Kerja Kepatuhan telah melaksanakan tugas dan tanggung jawab melalui sejumlah program kerja, antara lain:

In 2025, the Compliance Unit performed its duties and responsibilities through a number of work programs, including:

Program Kerja *Work Programs*	**Pelaksanaan** *Implementation*
Mempertahankan GCG pada peringkat 2 (BAIK) *Maintaining GCG at Rating 2 (GOOD)*	Berdasarkan hasil *self assessment* atas penerapan Tata Kelola Perusahaan (*Good Corporate Governance*/GCG) , penerapan Tata Kelola di Bank Sahabat Sampoerna selama tahun 2025 berada pada peringkat 2 , hal ini mencerminkan Manajemen Bank telah melakukan penerapan Tata Kelola / *Good Corporate Governance* yang secara umum Baik Hal ini tercermin dari pemenuhan yang telah memadai atas prinsip-prinsip Tata Kelola /*Good Corporate Governance*. 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 *Based on the results of the self-assessment of the implementation of Good Corporate Governance (GCG), Bank Sahabat Sampoerna's GCG implementation in 2025 achieved a rating 2, reflecting that the Bank's management has generally implemented Good Corporate Governance* *This is reflected in the adequate fulfillment of the principles of Corporate Governance/Good Corporate Governance.* *Although there are still weaknesses in the implementation of the principles of Corporate Governance, these weaknesses are generally not significant and can be resolved through normal management actions*

Program Kerja *Work Programs*	**Pelaksanaan** *Implementation*
Membuat langkah untuk mendukung terciptanya Budaya Kepatuhan pada seluruh kegiatan usaha Bank pada setiap jenjang organisasi *Ensuring to foster a culture of compliance across all the Bank's business activities at every level of the organization*	1. Untuk mendukung terciptanya Budaya Kepatuhan, Satuan Kerja Kepatuhan telah memiliki kebijakan umum Kepatuhan yang dilengkapi dengan Standar Operating Prosedur (SOP) untuk setiap aktifitas yang dilakukan pada Satuan Kerja Kepatuhan. 2. Satuan Kerja Kepatuhan juga telah menerbitkan Kebijakan Umum, Standar Operating Procedure ,Petunjuk Pelaksanaan dan Metodology GCG Self Assesment atas Penerapan Tata Kelola yang senantiasa disesuaikan dengan ketentuan Regulator yang berlaku, 3. Satuan Kerja Kepatuhan juga memiliki sistem dan program kerja yang senantiasa disesuaikan dengan ketentuan Regulator yang berlaku . 4. Satuan Kerja Kepatuhan melakukan penyesuaian kebijakan dan prosedur sesuai dengan ketentuan regulator yang berlaku, meliputi Kebijakan Khusus Standar Etika Karyawan, Revisi SOP Uji Kepatuhan versi 4, SOP Tata Kelola Bank (*Good Corporate Governance*), Kebijakan Tata Kelola Bank (*Good Corporate Governance*), SOP Indentifikasi dan Pemantauan Pihak Terkait (Pihak Berelasi). *1. To support the creation of a culture of compliance, the Compliance Unit has established a general compliance policy, supplemented by Standard Operating Procedures (SOPs) for every activity performed within the Compliance Unit.* *2. The Compliance Unit has also issued General Policies, Standard Operating Procedures, Implementation Guidelines, and the GCG Self-Assessment Methodology regarding the Implementation of Corporate Governance, which are consistently aligned with applicable regulatory requirements.* *3. The Compliance Unit also maintains systems and work programs that are consistently aligned with applicable regulatory requirements.* *4. The Compliance Unit adjusts policies and procedures in accordance with applicable regulatory requirements, including the Special Policy on Employee Ethics Standards, the Revision of the Compliance Test SOP Version 4, the Bank Governance SOP (Good Corporate Governance), the Bank Governance Policy (Good Corporate Governance), and the SOP for the Identification and Monitoring of Related Parties (Related Parties).*
Melakukan identifikasi, pengukuran, pemantauan, dan pengendalian terhadap Risiko Kepatuhan *Identifying, measuring, monitoring, and controlling compliance risks*	Dalam rangka melakukan proses pengelolaan Risiko Kepatuhan, satuan kerja kepatuhan berkoordinasi dengan satuan kerja manajemen risiko; Risiko Kepatuhan merupakan salah satu risiko yang dilakukan *assessment* secara berkala dan disampaikan di dalam Laporan profil risiko yang setiap bulan disampaikan kepada Manajemen; Satuan Kerja Kepatuhan berkoordinasi dengan Satuan Kerja Manajemen Risiko dalam melakukan pengawasan terhadap ketentuan pelanggaran dan/atau pelampauan BMPK dari sisi pemberian kredit dan secara berkesinambungan Bank akan terus meningkatkan kualitas proses pemberian kredit yang mengacu kepada prinsip kehati-hatian, hal ini tercermin dengan adanya kebijakan bahwa pemberian fasilitas kredit dengan total eksposur tertentu dan pemberian fasilitas kredit kepada pihak terkait wajib melalui uji Kepatuhan dari Satuan Kerja Kepatuhan; Dalam rangka penguatan sistem pengendalian internal secara triwulanan, diadakan rapat koordinasi antara Satuan Kerja Kepatuhan, Satuan Kerja Audit Internal, dan Satuan Kerja Manajemen Risiko dan untuk meningkatkan pengawasan internal bank dilakukan rapat secara intensif melalui Komite Manajemen Risiko, Komite ALCO, Komite Pemantau Risiko, dan Komite Audit sementara disisi lain bank juga memperkuat struktur SKMR, SKK, dan SKAI seiring dengan perkembangan usaha dan risiko yang dihadapi oleh Bank *As part of the Compliance Risk management process, the compliance unit coordinates with the risk management unit;* *Compliance Risk is one of the risks that is assessed periodically and reported in the Risk Profile Report, which is submitted monthly to Management;* *The Compliance Unit coordinates with the Risk Management Unit in monitoring compliance with the Legal Lending Limit (LLL)regarding violations and/or exceedances of the Legal Lending Limit (LLL)) in credit granting, and the Bank will continuously improve the quality of the credit granting process in accordance with the principle of prudence; This is reflected in the policy that the granting of credit facilities with a certain total exposure and the granting of credit facilities to related parties must undergo a compliance review by the Compliance Unit;* *To strengthen the internal control system on a quarterly basis, coordination meetings are held between the Compliance Unit, the Internal Audit Unit, and the Risk Management Unit. To enhance the Bank's internal oversight, intensive meetings are held through the Risk Management Committee, the ALCO Committee, the Risk Monitoring Committee, and the Audit Committee. Meanwhile, the Bank is also strengthening the structures of the Risk Management Unit (SKMR), the Compliance Unit (SKK), and the Internal Audit Unit (SKAI) in line with the Bank's business growth and the risks it faces.*

Program Kerja *Work Programs*	**Pelaksanaan** *Implementation*
Menilai dan mengevaluasi efektivitas, kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan peraturan perundang-undangan *Assessing and evaluating the effectiveness, adequacy, and compliance of the Bank's policies, regulations, systems, and procedures with applicable laws and regulations*	1. Satuan Kerja Kepatuhan menilai rancangan kebijakan, ketentuan, sistem maupun prosedur baru yang diterbitkan oleh Unit Kerja terkait melalui serangkaian uji Kepatuhan yang dilakukan untuk memastikan bahwa kebijakan, ketentuan dan sistem dan prosedur tersebut telah sesuai dengan ketentuan internal dan eksternal yang berlaku ; 2. Satuan Kerja Kepatuhan berinisiatif untuk melakukan penyempurnaan kebijakan, ketentuan, sistem maupun prosedur berkoordinasi dengan Unit Kerja terkait berdasarkan hasil gap analysis terhadap ketentuan terbaru yang terkait dengan operasional perbankan . *1. The Compliance Unit assesses draft policies, regulations, systems, and procedures issued by relevant business units through a series of compliance tests conducted to ensure that such policies, regulations, systems, and procedures comply with applicable internal and external regulations;* *2. The Compliance Unit takes the initiative to refine policies, regulations, systems, and procedures in coordination with relevant departments based on the results of a gap analysis against the latest regulations related to banking operations.*
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 peraturan perundang-undangan *Conducting reviews and/or recommending updates and improvements to the Bank's policies, regulations, systems, and procedures to ensure compliance with Financial Services Authority (OJK) regulations and applicable laws and regulations*	Ketentuan Regulator yang terkait dengan oeprasional perbankan , dilakukan *gap analysis* untuk menilai dan mengevaluasi kecukupan dan kesesuaian kebijakan dan/atau prosedur yang berlaku di bank , apabila diperlukan Satuan Kerja Kepatuhan akan merekomendasikan pengkinian dan penyempurnaan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan. *Regulatory requirements related to banking operations are subject to a gap analysis to assess and evaluate the adequacy and compliance of the policies and/or procedures in effect at the bank. If necessary, the Compliance Unit will recommend updates and improvements to the Bank's policies, regulations, systems, and procedures to ensure they comply with the requirements of the Financial Services Authority and applicable laws and regulations.*

Program Kerja *Work Programs*	**Pelaksanaan** *Implementation*
Melakukan upaya untuk memastikan bahwa kebijakan, ketentuan, sistem dan prosedur, serta kegiatan usaha Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan *Making efforts to ensure that the Bank's policies, regulations, systems, and procedures, as well as its business activities, comply with the provisions of the Financial Services Authority and applicable laws and regulations*	Untuk 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 yang berlaku, Satuan Kerja Kepatuhan bertanggung jawab untuk: 1. Melakukan uji kepatuhan untuk setiap kebijakan dan/atau prosedur, baik terkait perkreditan maupun non-perkreditan, serta produk dan/atau aktivitas baru yang akan diterbitkan, dengan tujuan untuk memastikan kesesuaian kebijakan, prosedur, dan produk/aktivitas baru tersebut dengan peraturan perundang-undangan yang berlaku. Apabila ditemukan adanya hal-hal yang tidak/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; 2. Melakukan uji kepatuhan terhadap pemberian kredit dengan *plafond* kredit di atas Rp10 miliar dan/atau pemberian kredit kepada pihak terkait; 3. Melakukan uji kepatuhan terhadap surat-surat dan semua laporan yang akan disampaikan ke Regulator sebelum disetujui oleh pejabat yang berwenang dan memastikan setiap laporan yang akan disampaikan ke regulator melalui *review* dan uji kepatuhan dari Divisi Kepatuhan telah sesuai ketentuan regulator yang berlaku.; 4. Melakukan *update checklist* atas ketentuan terbaru yang diterima dari regulator sebagai kertas kerja *compliance;* 5. Melakukan uji kepatuhan terhadap permohonan perijinan atas produk dan/atau aktivitas baru, pembukaan cabang, penutupan cabang, relokasi cabang; 6. Melaksanakan uji kepatuhan program APU-PPT & PPPSPM terhadap ketentuan internal Bank dan pengembangan produk baru; 7. Melaksanakan *self-assessment* terhadap Tata Kelola Perusahaan (GCG) setiap semester dan berkoordinasi dengan unit kerja terkait; 8. Melakukan *review* RBB sebelum disampaikan ke regulator, termasuk apabila terdapat revisi terhadap RBB dan juga terhadap laporan realisasinya. *To ensure that all policies, regulations, systems, and procedures, as well as the Bank's business activities, comply with the provisions of the Financial Services Authority and applicable laws and regulations, the Compliance Unit is responsible for:* *1. Conducting compliance reviews of all policies and/or procedures—whether related to lending or non-lending activities—as well as new products and/or activities to be introduced, with the aim of ensuring that such policies, procedures, and new products/activities comply with applicable laws and regulations. If any non-compliance or insufficient compliance with applicable laws and regulations is identified, it will be reported to the relevant unit for immediate changes or adjustments in accordance with established procedures. If necessary, the review results may be presented at a Board of Directors meeting;* *2. Conducting compliance checks on credit facilities with a credit limit exceeding Rp10 billion and/or credit facilities extended to related parties;* *3. Conduct compliance reviews of all documents and reports to be submitted to the regulator prior to approval by the authorized officer, and ensure that every report submitted to the regulator has undergone review and compliance testing by the Compliance Division and complies with applicable regulatory requirements;* *4. Update checklists based on the latest regulations received from the regulator as compliance working papers;* *5. Conduct compliance testing on licensing applications for new products and/or activities, branch openings, branch closures, and branch relocations;* *6. Conduct compliance testing of the AML-CTF & CPWMD programs against the Bank's internal regulations and new product development;* *7. Conducting self-assessments of Corporate Governance (GCG) every semester and coordinating with relevant work units;* *8. Review the RBB before submission to the regulator, including in cases where revisions are made to the RBB and its implementation report.*

Program Kerja *Work Programs*	**Pelaksanaan** *Implementation*
Memastikan kepatuhan Bank terhadap komitmen yang dibuat oleh Bank kepada Otoritas Jasa Keuangan dan/atau otoritas pengawas lain yang berwenang *Ensuring the Bank's compliance with the commitments it has made to the Financial Services Authority and/or other competent supervisory authorities*	1. 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. 2. *Monitoring* pemenuhan kewajiban pelaporan bank melalui Aplikasi *Compliance Regulatory Monitoring Application* (CRMA) yang senantiasa terus dikembangkan sesuai dengan ketentuan regulator terkini *1. In collaboration with the Internal Audit Unit, fully monitor all agreements and commitments made by the Bank to regulators, based on the findings of the Financial Services Authority and Bank Indonesia.* *2. Monitoring the Bank's fulfillment of reporting obligations through the Compliance Regulatory Monitoring Application (CRMA), which is continuously updated in accordance with the latest regulatory requirements*
Melakukan sosialisasi kepada seluruh pegawai Bank mengenai hal-hal yang terkait dengan Fungsi Kepatuhan terutama mengenai ketentuan yang berlaku *Conducting awareness sessions for all Bank employees regarding matters related to the Compliance Function, particularly regarding applicable regulations*	1. *Mandatory e-learning* untuk materi *Compliance Awareness,* APU-PPT & Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massa (PPPSPM*)* dan Kode Etik Karyawan bagi seluruh karyawan . Bagi karyawan cabang yang berhubungan langsung dengan nasabah , wajib memenuhi *refreshment e-learning refreshment* APU-PPT & PPPSPM setiap tahun; 2. Sosialisasi melalui *Regulation update* untuk setiap ketentuan baru dari regulator berupa Peraturan Bank Indonesia, Peraturan Anggota Dewan Gubernur, Peraturan dan Surat Edaran Otoritas Jasa Keuangan, serta ketentuan perundang-undangan lainnya terkait penyedia jasa keuangan*;* 3. Ketentuan 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; 4. 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; 5. Apabila terdapat ketentuan eksternal yang mengharuskan Bank membuat atau melakukan penyesuaian atas suatu kebijakan internal, maka unit kerja terkait harus menginternalisasikan kebijakan tersebut untuk selanjutnya dilakukan uji kepatuhan sebelum meminta persetujuan kepada Dewan Komisaris dan/atau Direksi; 6. Kebijakan dan/atau prosedur yang telah selesai disusun dan disetujui, selanjutnya didistribusikan 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.* *1. Mandatory e-learning on Compliance Awareness, Anti-Money Laundering and Counter-Terrorist Financing (AML-CTF), and the Prevention of Financing the Proliferation of Weapons of Mass Destruction (CPWMD;), as well as the Employee Code of Conduct, for all employees. Branch employees who interact directly with customers are required to complete annual refresher e-learning on AML-CTF & CPWMD;* *2. Socialization through regulatory updates for every new provision from regulators, including Bank Indonesia Regulations, Regulations of the Board of Governors, Regulations and Circular Letters of the Financial Services Authority, as well as other laws and regulations related to financial service providers;* *3. Provisions directly related to banking operations are incorporated into the Compliance Regulatory Self-Assessment (CRSA) application and communicated to the relevant work units for self-assessment, with the aim of ensuring these units understand and apply them in transaction execution;* *4. If new external regulations require immediate follow-up to provide a better understanding and avoid differing interpretations, then these regulations are communicated directly to the relevant units;* *5. If there are external regulations requiring the Bank to establish or amend an internal policy, the relevant department must incorporate such policy and conduct a compliance review before seeking approval from the Board of Commissioners and/or the Board of Directors;* *6. Policies and/or procedures that have been finalized and approved are subsequently distributed to all work units/branch offices to be studied, understood, and implemented. One form of dissemination is via email, morning briefings/morning enlightenment sessions at branches and the Head Office, as well as uploading to the e-library portal.*
Implementasi dan pengembangan Aplikasi *Compliance Regulatory Monitoring Application* (CRMA) *Implementation and Development of the Compliance Regulatory Monitoring Application (CRMA)*	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. *The Bank has implemented and continues to develop the Compliance Regulatory Monitoring Application (CRMA), one of whose functions is to monitor the Bank's commitment to fulfilling obligations required by regulators/supervisors. The quality of this application's implementation is continuously improved and serves as a key tool in fostering a culture of compliance.*

Program Kerja *Work Programs*	**Pelaksanaan** *Implementation*
Pemantauan atas kewajiban pemenuhan Kewajiban Sertifikasi sesuai dengan Kewajiban Regulator *Monitoring of Compliance with Certification Requirements in Accordance with Regulatory Obligations*	Satuan Kerja Kepatuhan melakukan Pemantauan atas pemenuhan kewajiban sertifikasi sesuai dengan bidang tugas Unit Kerja yang diwajibkan oleh Regulator, sesuai dengan jenjang/level masing-masing yang ditetapkan Regulator diantaranya sertifikasi di bidang Manajemen Risiko, Pemeliharaan Sertifikasi Manajemen Risiko, Serifikasi Kepatuhan dan APU PPT, Sertifikasi Profesi *Treasury*, Sertifikasi Penilai Internal, Sertifikasi Standar Kompetensi di Bidang Sistem Pembayaran (SK SP) *The Compliance Unit monitors compliance with certification requirements in accordance with the scope of duties of the relevant work units as mandated by the regulator, in accordance with the respective levels established by the regulator, including certifications in the fields of Risk Management, Risk Management Certification Maintenance, Compliance Certification, and Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF), Treasury Professional Certification, Internal Auditor Certification, and Certification of Competency Standards in the Field of Payment Systems (SK SP)*
Program Sertifikasi Kepatuhan *Compliance Certification Program*	Sumber Daya Manusia (SDM) pada Satuan Kerja Kepatuhan (SKK) memiliki pengalaman yang memadai dalam pengelolaan fungsi kepatuhan. Bank senantiasa meningkatkan kompetensi dan kapasitas SDM SKK agar sejalan dengan perkembangan serta kompleksitas kegiatan usaha Bank, antara lain melalui pelaksanaan Program Sertifikasi Kepatuhan yang diselenggarakan oleh Forum Komunikasi Direktur Kepatuhan Perbankan (FKDKP), yang diikuti oleh Direktur Kepatuhan, pejabat dan karyawan SKK. *The Human Resources (HR) staff at the Compliance Unit (SKK) have sufficient experience in managing compliance functions. The Bank continuously enhances the competence and capacity of SKK HR to keep pace with the development and complexity of the Bank's business activities, including through the implementation of the Compliance Certification Program organized by the Banking Compliance Directors Communication Forum (FKDKP), which is attended by the Compliance Director, SKK officials, and employees.*

Sebelum	Sesudah
Level 1	Jenjang 5 (Officer)
Level 2	Jenjang 6 (Manager)
Level 3	Jenjang 7 (Direksi dan Komisaris)

Karyawan Satuan Kerja Kepatuhan yang mengikuti Sertifikasi Kepatuhan adalah seluruh karyawan yang tergabung dalam Unit Kerja *Compliance Advisory*, *Compliance Digital & International Banking* dan *Data Quality Management & Compliance Regulatory Monitoring Application* (DQM & CRMA), karyawan level *manager* yaitu *Compliance Advisory Group Head* dan Kepala Satuan Kerja Kepatuhan, dan karyawan level Direksi yaitu *Compliance & Risk Director*. Jumlah karyawan yang telah mengikuti Sertifikasi Kepatuhan hingga bulan Desember 2025 dengan rincian sebagai berikut :

The employees of the Compliance Unit participating in the Compliance Certification program include all employees within the Compliance Advisory, Compliance Digital & International Banking, and Data Quality Management & Compliance Regulatory Monitoring Application (DQM & CRMA) units; manager-level employees, namely the Head of the Compliance Advisory Group and the Head of the Compliance Unit; and executive-level employees, namely the Compliance & Risk Director. The number of employees who have participated in the Compliance Certification as of December 2025 is as follows:

Jenjang	Tersertifikasi Sebelum KKNI 2023	Bersertifikasi Setelah KKNI 2023	Belum Tersertifikasi	Jumlah Karyawan Terpenuhi
Jenjang 5	2	5	1	7 dari 8 (87,5%)
Jenjang 6	1	0	1	1 dari 2 (50%)
Jenjang 7	0	0	1	O dari 1 (0%)

Hingga periode Desember 2025, secara keseluruhan terdapat terdapat satu orang karyawan level *staf/officer* yang belum mengikuti Sertifikasi Kepatuhan Jenjang 5, satu orang karyawan level *Senior Management Team* (SMT) belum mengikuti Sertifikasi Kepatuhan Jenjang 6, dan satu orang karyawan level *Board of Management* (BoM) yang belum mengikuti Sertifikasi Kepatuhan Jenjang 7
Untuk karyawan yang belum ikutserta dalam program sertifikasi akan diikutsertakan pada program sertifikasi menyesuaikan dengan jadwal penyelenggaraan dari Badan Penyelenggaran Sertifikasi yang terdaftar di OJK.

As of December 2025, there are a total of , one staff/officer-level employee has not yet completed Level 5 Compliance Certification, one Senior Management Team (SMT)-level employee has not yet completed Level 6 Compliance Certification, and one Board of Management (BoM)-level employee has not yet completed Level 7 Compliance Certification
Employees who have not yet participated in the certification program will be signed up in the program in accordance with the schedule set by the certification body registered with the OJK.

Program Kerja *Work Programs*	**Pelaksanaan** *Implementation*
Penerapan Tata Kelola Perusahaan (*Good Corporate Governance*) *Implementation of Good Corporate Governance*	• Melakukan pengawasan internal Bank terutama terkait pelaksanaan *Good Corporate Governance* baik dari sisi *Governance Structure*, *Governance Process* maupun *Governance Outcome* • Mempertahankan *Risk Based Bank Rating* (RBBR) dan *Good Corporate Governance* (GCG) diperingkat komposit 2 (dua) dimana bank telah menyusun rencana kerja untuk mempertahankan peringkat komposit RBBR dan GCG minimum 2 (dua) yang mengacu kepada arahan dari OJK. Setiap komponen RBBR diidentifikasi, dipaparkan secara rinci, termasuk komponen penilaiannya. Penilaian internal terhadap aspek RBBR dilakukan secara berkala. Khusus untuk penilaian internal profil risiko dilakukan secara bulanan yang didukung oleh seluruh penanggung jawab risiko dan dikoordinir oleh Satuan Kerja Manajemen Risiko (SKMR). Pendalaman pemahaman Bank akan setiap komponen RBBR dan GCG juga menjadi perhatian utama Bank. • Penilaian terhadap RBBR dan penerapan GCG secara *self-assessment* setiap tahunnya dilakukan paling kurang sebanyak 2 (dua) kali, yaitu untuk periode sampai dengan akhir Juni dan akhir Desember. Jika diperlukan, atas hasil penilaian disusun rencana tindak lanjut agar dapat mencapai tingkatan yang lebih baik dan sesuai dengan target yang diharapkan • Hasil penilaian GCG Bank per posisi Desember 2025 menempatkan Bank pada peringkat komposit 2 hal ini mencerminkan Manajemen Bank telah melakukan penerapan Tata Kelola / *Good Corporate Governance* yang secara umum Baik. Walaupun masih terdapat beberapa catatan kelemahan yang terjadi pada aktivitas perkreditan dan sistem pengendalian internal termasuk fungsi kepatuhan, akan tetapi dapat diselesaikan dengan tindakan normal oleh Manajemen Bank, diantaranya melalui peningkatkan kompetensi SDM, manajemen risiko, budaya kepatuhan, pengembangan *e-learning* yang mencakup seluruh *Compliance Awareness*, perbaikan proses dan organisasi, serta menerapkan sistem *reward* dan *punishment* secara konsisten. • Disamping itu perbaikan tersebut ditunjang oleh konsistensi dan komitmen Dewan Komisaris dan Direksi yang menjunjung tinggi integritas, transparansi, serta keadilan melalui program-program manajemen dalam rangka pembentukan dan memperkuat nilai-nilai perusahaan yang diharapkan serta adanya komunikasi yang transparan kepada karyawan yang dilakukan oleh Direksi melalui *sharing session* secara rutin terkait dengan kebijakan, strategi dan *performance* Bank. Hal yang terpenting lainnya adalah tidak ada intervensi dari Pemegang saham dan Pemegang saham yang juga memiliki komitmen yang tinggi untuk membangun Bank yang sehat. • Peningkatan kualitas penerapan GCG diharapkan dapat dicapai melalui peningkatan kinerja komite-komite, penyempurnaan dan pelaksanaan kerangka kerja pengendalian internal yang lebih baik atas kerja sama SKMR, SKK, dan SKAI. • Struktur organisasi Bank telah menggambarkan pemisahan fungsi antara unit kerja operasional dengan satuan kerja yang melaksanakan pengendalian, seperti antara Unit Kerja Bisnis yang berada di bawah Direktorat *SME & High-End Business* dan Direktorat ESME *Business* yang terpisah dengan Unit Kerja Kredit yang berada di bawah Direktorat Kredit dan *Collection*, dan juga antara Unit Kerja Tresuri dengan Unit Kerja *Operation* yang melaksanakan *settlement*, serta antara unit pemangku risiko *(risk taking unit)* dengan SKMR, SKAI dan SKK • *Conducting internal oversight of the Bank, particularly regarding the implementation of Good Corporate Governance, including Governance Structure, Governance Process, and Governance Outcome* • *Maintaining a Risk-Based Bank Rating (RBBR) and Good Corporate Governance (GCG) at a composite rating of 2 (two), where the bank has developed a work plan to maintain a minimum composite RBBR and GCG rating of 2 (two) in accordance with OJK guidelines. Each RBBR component is identified and described in detail, including its assessment criteria. Internal assessments of RBBR aspects are conducted periodically. Specifically, internal risk profile assessments are conducted monthly, supported by all risk officers and coordinated by the Risk Management Unit (SKMR). Deepening the Bank's understanding of each RBBR and GCG component is also a key priority for the Bank.* • *An annual self-assessment of the RBBR and the implementation of GCG is conducted at least twice a year, specifically for the periods ending in June and December. If necessary, a follow-up action plan is developed based on the assessment results to achieve a higher standard and meet the expected targets.* • *The results of the Bank's GCG assessment as of December 2025 place the Bank at a composite rating of 2, reflecting that the Bank's management has implemented Good Corporate Governance that is generally sound. Although there are still some noted weaknesses in lending activities and internal control systems, including compliance functions, these can be resolved through standard measures by the Bank's management, such as enhancing human resource competencies, risk management, a culture of compliance, developing e-learning programs covering all aspects of compliance awareness, improving processes and organizational structure, and consistently implementing a reward and punishment system.* • *In addition, these improvements are supported by the consistency and commitment of the Board of Commissioners and the Board of Directors, who uphold integrity, transparency, and fairness through management programs aimed at establishing and strengthening the desired corporate values, as well as through transparent communication with employees—performed by the Board of Directors via regular sharing sessions regarding the Bank's policies, strategies, and performance. Another key factor is the absence of interference from shareholders, who also demonstrate a strong commitment to building a healthy Bank.* • *Improvements in the quality of GCG implementation are expected to be achieved through enhanced committee performance, the refinement and implementation of the " " framework, and better internal controls through collaboration among the SKMR, SKK, and SKAI.* • *The Bank's organizational structure reflects a separation of functions between operational units and units responsible for control, such as between the Business Units under the SME & High-End Business Directorate and the ESME Business Directorate, which are separate from the Credit Unit under the Credit and Collection Directorate, as well as between the Treasury Unit and the Operations Unit responsible for settlement, and between the risk-taking units and the Risk Management, Audit, and Compliance Units.*

Program Kerja *Work Programs*	**Pelaksanaan** *Implementation*
Bertindak sebagai narahubung (*contact person*) untuk permasalahan kepatuhan Bank bagi pihak internal maupun eksternal. *Serves as the contact person for Bank compliance issues for both internal and external parties.*	• Satuan Kerja Kepatuhan bertindak sebagai narahubung (*contact person*) untuk setiap permasalahan Kepatuhan bagi pihak internal dan pihak eksternal, hal ini dilaksanakan diantaranya dengan memberikan opini kepatuhan atas setiap permasalahan Kepatuhan yang diajukan unit kerja lainnya. • Membangun dan memelihara hubungan positif dengan regulator, dan pemangku kepentingan lainnya • Menjadi narahubung antara bank dan Regulator untuk memastikan komunikasi yang efektif. • Berkolaborasi dengan tim internal untuk memberikan pemahaman tentang kebijakan pemerintah dan dampaknya terhadap bank. • *The Compliance Unit serves as the point of contact for all compliance-related matters for both internal and external parties; this is performed, among other things, by providing compliance opinions on any compliance issues raised by other business units.* • *Building and maintaining positive relationships with regulators and other stakeholders* • *Serving as the liaison between the bank and regulators to ensure effective communication.* • *Collaborating with internal teams to provide insight into government policies and their impact on the bank.*

Pengembangan Kompetensi

Untuk menunjang Satuan Kerja Kepatuhan dalam melaksanakan tugas dan tanggung jawabnya, Bank Sahabat Sampoerna memberikan kesempatan kepada Satuan Kerja Kepatuhan untuk mengikuti program pelatihan dan pengembangan kompetensi, baik yang diselenggarakan oleh internal maupun pihak eksternal. Adapun program pengembangan kompetensi yang diikuti oleh Satuan Kerja Kepatuhan di tahun 2025 adalah sebagai berikut:

Competency Development

To support the Compliance Unit in conducting its duties and responsibilities, Bank Sahabat Sampoerna provides the Compliance Unit with opportunities to participate in training and competency development programs, whether organized internally or by external parties. The competency development programs participated in by the Compliance Unit in 2025 are as follows:

Topik Pelatihan *Training Topics*	**Penyelenggara** *Organizer*	**Tanggal Pelatihan** *Training Date*
Sertifikasi Manajemen Risiko Jenjang 4 *Level 4 Risk Management Certification*	Garda	2025
Sertifikasi Kepatuhan Perbankan Jenjang 5 *Level 5 Risk Management Certification*	Maisa Edukasi	2025
Sertifikasi APU PPT & PPSM Jenjang 5 *Level 5 APU PPT & PPSM Certification*	FKDKP	2025

Penilaian Kinerja Satuan Kerja Kepatuhan

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.14 tahun 2025 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 2025, aspek Penerapan Fungsi Kepatuhan memperoleh nilai komposit 2 atau "*Low to moderate* .". Hasil penilaian ini telah diungkapkan pada pembahasan mengenai Hasil *Self-Assessment* Tata Kelola Perusahaan (GCG) di dalam Laporan Tahunan ini.

Performance Assessment of Compliance Units

The Bank regularly conducts assessments of the Compliance Function to evaluate the effectiveness of its performance during the fiscal year. This assessment is conducted using the self-assessment method for Corporate Governance (GCG), with evaluation criteria based on POJK No. 17 of 2023 and SEOJK No. 14 of 2025 regarding the Implementation of Corporate Governance for Commercial Banks. The results of this assessment are subsequently reported to the Compliance & Risk Director and submitted to the Financial Services Authority in accordance with the established deadlines.

Based on the results of the Corporate Governance (GCG) self-assessment conducted by the Bank in 2025, the aspect of Compliance Function Implementation received a composite score of 2, or "Low to moderate." These assessment results have been disclosed in the section on Corporate Governance (GCG) Self-Assessment Results in this Annual Report.

Mekanisme Pengangkatan dan Pemberhentian Kepala Satuan 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.

Mechanism for the Appointment and Dismissal of the Head of the Compliance Unit

The process of appointing and dismissing the Head of the Compliance Unit falls under the authority of the Compliance & Risk Director and is approved by the Bank's President Director. The appointment and dismissal of the Head of the Compliance Unit must be immediately reported to the Financial Services Authority.

Program Anti Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (APU, PPT dan PPPSPM)

Bank Sahabat Sampoerna memperoleh penilaian Sangat Baik dalam Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF) Tahun Anggaran 2025 yang diselenggarakan PPATK bersama Lembaga Pengawas dan Pengatur (LPP) lainnya bersama Aparat Penegak Hukum. Hal ini menunjukkan bahwa tingkat komitmen Bank Sahabat Sampoerna dalam mendukung PPATK dan Aparat Penegak Hukum untuk melakukan penelusuran transaksi keuangan terkait indikasi TPPU/TPPT/PPSPM dan tingkat implementasi tata kelola pelaporan APU, PPT dan PPPSPM sesuai ketentuan LPP dan pedoman pelaporan PPATK serta tingkat kepatuhan terhadap kewajiban pelaporan APU, PPT dan PPPSPM kepada PPATK dan kualitas laporan yang disampaikan masuk pada kategori Sangat Baik.

Bank Sahabat Sampoerna memiliki unit kerja khusus APU, PPT dan PPPSPM yang berada di bawah Satuan Kerja Kepatuhan Bank. Unit kerja ini bertindak sebagai penanggung jawab penerapan Program APU, PPT dan PPPSPM, sesuai dengan ketentuan terkini, yakni POJK No. 8 Tahun 2023 tentang Penerapan Program APU, PPT dan PPPSPM di Sektor Jasa Keuangan yang diinternalisasikan pada Kebijakan Khusus APU, PPT dan PPPSPM No. BSS/KK/PMN-SDR/05.

Penerapan program APU, PPT dan 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.

Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Financing of Weapons of Mass Destruction Program (AML, CTF, and CFWMD)

Bank Sahabat Sampoerna received a "Very Good" rating in the Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF) for Fiscal Year 2025, conducted by the Financial Transaction Reports and Analysis Center (PPATK) in collaboration with other Supervisory and Regulatory Agencies (LPP) and Law Enforcement Authorities. This demonstrates Bank Sahabat Sampoerna's high level of commitment to supporting PPATK and law enforcement agencies in tracing financial transactions related to indications of money laundering, terrorism financing, and the financing of the spread of extremism, as well as the bank's implementation of governance standards for reporting on Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), and the Financing of the Spread of Extremism (FSE) in accordance with LPP regulations and PPATK reporting guidelines, and its compliance with reporting obligations regarding AML, and PPT to the PPATK, as well as the quality of the reports submitted, falls into the "Very Good" category.

Bank Sahabat Sampoerna has a dedicated unit for AML, CFT, and PPPSPM that operates under the Bank's Compliance Unit. These units are responsible for implementing the APU, PPT, and PPPSPM programs in accordance with the latest regulations, namely POJK No. 8 of 2023 concerning the Implementation of AML-CTF & CPWMD Programs in the Financial Services Sector, which has been internalized in Special Policy No. BSS/KK/PMN-SDR/05 on APU, PPT, and PPPSPM.

The implementation of the APU, PPT, and PPPSPM programs at Bank Sahabat Sampoerna is performed with reference to 5 (five) main pillars, namely:

1. *Active Supervisory by the Board of Directors and Board of Commissioners*
   The Board of Directors and Board of Commissioners perform their supervisory duties in accordance with applicable Financial Services Authority regulations.

2. Kebijakan dan Prosedur
   Bank memiliki kebijakan dan prosedur yang merujuk pada surat arahan dan peraturan-peraturan lembaga pengawas dan pengatur terkini, serta sesuai dengan perkembangan bisnis Bank.

3. Pengendalian Internal
   Pada Bank terdapat Risk Control Unit, SKAI dan Unit Kerja Khusus APU, PPT dan PPPSPM yang melaksanakan pengawasan internal penerapan Program APU, PPT dan PPPSPM, serta memastikan kepatuhan pelaporan dan kualitas pelaporan kepada PPATK, Otoritas Jasa Keuangan dan Bank Indonesia.

4. Sistem Informasi dan Teknologi
   Bank memiliki *core banking system* yang memenuhi Peraturan Otoritas Jasa Keuangan yang berlaku, serta menggunakan alat bantu penerapan APU, PPT dan PPPSPM termasuk pelaporan kepada PPATK, yang terus-menerus disempurnakan sejalan dengan peraturan dan arahan terkini LPP 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 dan PPPSPM kepada seluruh karyawan, baik secara mandiri maupun bekerja sama dengan Otoritas Jasa Keuangan dan PPATK, serta lembaga lainnya.

2. Policies and Procedures
The Bank has policies and procedures that are based on the latest guidelines and regulations issued by supervisory and regulatory authorities, and are aligned with the Bank's business developments.

3. Internal Control
The Bank has a Risk Control Unit, SKAI, and Special Units for AML-CTF & CPWMD that conduct internal oversight of the implementation of the AML-CTF & CPWMD programs, and ensure compliance with reporting requirements and the quality of reports submitted to the PPATK, the Financial Services Authority, and Bank Indonesia.

4. Information Systems and Technology
The Bank has a core banking system that complies with applicable Financial Services Authority regulations and utilizes tools for implementing AML-CTF & CPWMD measures, including reporting to the Financial Transaction Reports and Analysis Center (PPATK), which are continuously refined in line with the latest regulations and directives from the Financial Services Authority (LPP) and the Bank's business developments.

5. Human Resources and Training
The Bank has an employee screening and monitoring program (know your employee) and provides various training programs related to AML-CTF & CPWMD to all employees, both independently and in collaboration with the Financial Services Authority (OJK) and the Financial Transaction Reports and Analysis Center (PPATK), as well as other institutions.

Kode Etik

Code of Conduct

Bank Sahabat Sampoerna menempatkan Kode Etik sebagai landasan utama dalam membangun dan menjaga budaya integritas di seluruh tingkatan organisasi. Kode Etik ini berfungsi sebagai pedoman perilaku bagi seluruh insan Bank dalam menjalankan kegiatan usaha dan operasional sehari-hari, sekaligus sebagai instrumen penting dalam mendukung pencapaian visi dan misi perusahaan yang memerlukan komitmen seluruh pemangku kepentingan, khususnya insan Bank.

Sebagai panduan perilaku (*code of conduct*), Kode Etik mengarahkan setiap insan Bank untuk senantiasa bertindak secara profesional, beretika, dan berintegritas dalam setiap aktivitas bisnis maupun operasional. Dalam implementasinya, Kode Etik tidak hanya menjadi acuan normatif, tetapi juga merupakan bagian integral dari

Bank Sahabat Sampoerna regards its Code of Conduct as the cornerstone for building and maintaining a culture of integrity at all levels of the organization. This Code of Conduct serves as a guide for the conduct of all Bank employees in conducting their daily business and operational activities, as well as an important instrument in supporting the achievement of the company's vision and mission, which require the commitment of all stakeholders, particularly Bank employees.

As a code of conduct, the Code of Conduct guides every employee of the Bank to always act professionally, ethically, and with integrity in all business and operational activities. In its implementation, the Code of Conduct serves not only as a normative reference but is also an integral part of the application of good corporate governance. These penerapan tata kelola perusahaan yang baik (*Good Corporate Governance*). Pedoman ini mengatur standar perilaku dalam interaksi dengan nasabah, mitra usaha, regulator, serta dalam hubungan kerja internal, guna memastikan terciptanya lingkungan kerja yang sehat, transparan, dan berintegritas.

guidelines establish standards of conduct in interactions with customers, business partners, and regulators, as well as in internal working relationships, to ensure the creation of a healthy, transparent, and ethical work environment.

Sejalan dengan perkembangan regulasi serta dinamika industri jasa keuangan, Bank secara berkala melakukan evaluasi dan penyempurnaan terhadap Kode Etik untuk menjaga relevansi dan efektivitasnya. Kode Etik Bank Sahabat Sampoerna yang telah disahkan pada 4 Mei 2015 terakhir diperbarui pada 26 September 2024 sebagai wujud komitmen berkelanjutan dalam memperkuat penerapan nilai-nilai etika dan tata kelola.

In line with regulatory developments and the dynamics of the financial services industry, the Bank periodically reviews and updates its Code of Conduct to ensure its relevance and effectiveness. The Bank Sahabat Sampoerna Code of Conduct, which was adopted on May 4, 2015, was last updated on September 26, 2024, as a manifestation of the Bank's ongoing commitment to strengthening the implementation of ethical values and governance.

Melalui penerapan Kode Etik yang konsisten dan berkesinambungan, Bank Sahabat Sampoerna terus memperkokoh fondasi kepercayaan pemangku kepentingan serta mendukung keberlanjutan usaha yang sehat, bertanggung jawab, dan berintegritas.

Through the consistent and continuous implementation of the Code of Conduct, Bank Sahabat Sampoerna continues to strengthen the foundation of stakeholder trust and supports the sustainability of a healthy, responsible, and integrity-driven business.

Pokok-Pokok Kode Etik

Secara garis besar, pokok-pokok Kode Etik Bank Sahabat Sampoerna terdiri dari 11 (sebelas) butir kode etik yang berlaku bagi seluruh Karyawan Bank Sahabat Sampoerna (BSS) yaitu:

1. Nilai-nilai budaya Perusahaan (Corporate Value)
   Nilai-nilai budaya Perusahaan mengacu pada *The Sampoerna Way*.
   The Sampoerna Way memiliki 6 (enam) nilai inti yang terbagi dalam 2 (dua) filosofi yang diharapkan menjadi pedoman bagi setiap Karyawan yakni sebagai berikut:
   a. Anggarda Paramita (*Towards Excellence*) — menuju kesempurnaan.
   b. The Three Hands (Tiga Tangan) — hubungan yang harmoni antara Perusahaan, mitra bisnis, dan komunitas.
2. Budaya Kepatuhan
   Karyawan harus mematuhi peraturan internal Bank, Peraturan Bank Indonesia, Peraturan Otoritas Jasa Keuangan (OJK), Peraturan Regulator terkait lainnya, dan peraturan perundang-undangan lainnya yang berlaku. Karyawan harus mematuhi kebijakan yang tersurat maupun yang tersirat dalam peraturan internal Bank, Peraturan OJK/Regulator terkait lainnya, dan peraturan perundang-undangan lainnya yang berlaku.
3. Anti Korupsi/Suap dan Anti Fraud
   Karyawan dilarang memberi atau menerima suap kepada dan/atau dari Pihak manapun dan dilarang terlibat dengan segala bentuk korupsi, suap maupun *fraud*.
4. Tidak Melakukan Mis-Selling atau Misrepresent Produk dan Jasa
   Karyawan harus memahami dan mematuhi peraturan-peraturan yang berlaku untuk menghindari terjadinya *mis-selling* (salah menjual) dan *misrepresent* (salah cara penyampaian) kepada Nasabah dan/atau calon Nasabah.

Key Points of the Code of Conduct

In general, the key principles of Bank Sahabat Sampoerna's Code of Conduct consist of 11 (eleven) ethical guidelines that apply to all Bank Sahabat Sampoerna (BSS) employees, namely:

1. *Corporate Values*
   Corporate Values refer to The Sampoerna Way.

   The Sampoerna Way comprises 6 (six) core values divided into 2 (two) philosophies intended to serve as a guide for every employee, as follows:
   a. *Anggarda Paramita (Towards Excellence) — striving for perfection.*
   b. *The Three Hands — a harmonious relationship between the Company, business partners, and the community.*
2. *Compliance Culture*
   Employees must comply with the Bank's internal regulations, Bank Indonesia regulations, Financial Services Authority (OJK) regulations, regulations of other relevant regulators, and other applicable laws and regulations. Employees must comply with both the explicit and implicit policies contained in the Bank's internal regulations, OJK regulations and those of other relevant regulators, and other applicable laws and regulations.
3. *Anti-Corruption/Bribery and Anti-Fraud*
   Employees are prohibited from giving or receiving bribes to and/or from any party and are prohibited from engaging in any form of corruption, bribery, or fraud.
4. *No Mis-Selling or Misrepresentation of Products and Services*
   Employees must understand and comply with applicable regulations to prevent mis-selling and misrepresentation to customers and/or prospective customers.

5. Mencegah Pencucian Uang
   Karyawan harus mematuhi peraturan internal Bank serta peraturan perundang-undangan yang berlaku dalam mencegah terjadinya Tindak Pidana Pencucian Uang serta pendanaan teroris di lingkungan Bank.
6. Menghindari Benturan Kepentingan
   Karyawan harus mengambil langkah-langkah untuk menghindari benturan kepentingan. Apabila Karyawan dihadapkan situasi dimana Karyawan tidak dapat bertindak obyektif, Karyawan harus mengeskalasi kepada pimpinan yang lebih tinggi agar dapat mengambil tindakan untuk mengatasi dan mengelolanya dengan cara yang terbuka.
7. Menjaga Kerahasiaan dan Perlindungan Informasi & Data
   Setiap Karyawan bertanggung jawab menjaga kerahasiaan informasi dan data internal Bank, maupun informasi dan data yang diberikan oleh Nasabah dan/atau calon Nasabah kepada Bank sesuai dengan ketentuan yang berlaku
8. Menghindari Berkompromi karena Hadiah dan Hiburan (Entertainment)
   Karyawan tidak diperkenankan menawarkan, memberikan, ataupun menerima hadiah, baik uang, barang, dan hiburan (*entertainment*) di luar batas kewajaran dari atau kepada Pihak Ketiga sesuai dengan ketentuan internal yang berlaku.
9. Cepat dan Tanggap dalam Menangani Keluhan Nasabah
   Karyawan harus memastikan bahwa semua keluhan Nasabah ditangani dengan cepat, tanggap, dan diadministrasikan dengan benar.
10. Berani Berbicara (Speak Up)
    Karyawan harus melakukan *Speak Up* apabila mencurigai adanya perilaku dari bagian manapun, baik yang aktual, direncanakan maupun potensial, yang melanggar peraturan internal Bank dan peraturan perundang-undangan lainnya yang berlaku.
11. Penggunaan Peralatan dan Fasilitas
    Bank menyediakan fasilitas dan peralatan kerja yang memadai bagi Karyawan agar dapat melaksanakan tugas secara efektif dan efisien, untuk itu Karyawan wajib menggunakan dan memeliharanya dengan baik sesuai dengan peraturan yang berlaku di Bank.

5. Preventing Money Laundering
Employees must comply with the Bank's internal regulations as well as applicable laws and regulations to prevent money laundering and terrorist financing within the Bank.
6. Avoiding Conflicts of Interest
Employees must take steps to avoid conflicts of interest. If an employee finds themselves in a situation where they cannot act objectively, they must escalate the matter to a higher-level manager so that appropriate action can be taken to address and manage it in a transparent manner.
7. Maintaining Confidentiality and Protecting Information & Data
Every Employee is responsible for maintaining the confidentiality of the Bank's internal information and data, as well as information and data provided by Customers and/or prospective Customers to the Bank in accordance with applicable regulations
8. Avoiding Compromises Due to Gifts and Entertainment
Employees are not permitted to offer, give, or accept gifts—whether in the form of money, goods, or entertainment—that exceed reasonable limits from or to Third Parties, in accordance with applicable internal policies.
9. Prompt and Responsive Handling of Customer Complaints
Employees must ensure that all customer complaints are handled promptly, responsively, and properly documented.
10. Speak Up
Employees must speak up if they suspect any behavior from any department—whether actual, planned, or potential—that violates the Bank's internal regulations and other applicable laws and regulations.
11. Use of Equipment and Facilities
The Bank provides adequate work facilities and equipment for Employees to enable them to perform their duties effectively and efficiently; therefore, Employees must use and maintain them properly in accordance with the Bank's applicable regulations.

Kepatuhan dan Kode Etik sebagai Pilar Utama Transformasi Digital Berkelanjutan

Di tengah akselerasi transformasi digital, Bank Sahabat Sampoerna menempatkan kepatuhan sebagai pilar utama dalam menjaga kepercayaan nasabah sekaligus mendorong inovasi yang berkelanjutan. Setiap inisiatif strategis dirancang dengan berlandaskan prinsip kehati-hatian, tata kelola yang kuat, serta keselarasan penuh terhadap kerangka regulasi yang berlaku.

Compliance and the Code of Conduct as the Cornerstones of Sustainable Digital Transformation

Amid the acceleration of digital transformation, Bank Sahabat Sampoerna positions compliance as a key pillar in maintaining customer trust while driving sustainable innovation. Every strategic initiative is designed based on the principles of prudence, strong governance, and full alignment with the applicable regulatory framework.

Pelindungan data pribadi menjadi prioritas fundamental, sejalan dengan Undang-Undang Nomor 27 Tahun 2022 tentang Pelindungan Data Pribadi. Bank memastikan bahwa seluruh pemrosesan data nasabah, termasuk data biometrik dan keuangan dilakukan secara aman, transparan, dan akuntabel. Keberadaan Pejabat Pelindungan Data (*Data Protection Officer*/DPO) yang terhubung langsung dengan manajemen puncak memperkuat pengawasan dan memastikan kepatuhan berjalan secara efektif.

The protection of personal data is a fundamental priority, in accordance with Law No. 27 of 2022 on Personal Data Protection. The Bank ensures that all processing of customer data, including biometric and financial data, is conducted securely, transparently, and accountably. The presence of a Data Protection Officer (DPO) who reports directly to top management strengthens oversight and ensures effective compliance.

Dalam memperkuat tata kelola, Bank mengacu pada POJK Nomor 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum yang menegaskan peran aktif Direksi dan Dewan Komisaris dalam membangun budaya kepatuhan. Tata kelola tidak lagi sekadar fungsi pengawasan, melainkan menjadi penggerak utama dalam memastikan bahwa setiap inovasi berjalan selaras dengan prinsip tata kelola yang baik (*good corporate governance*).

In strengthening corporate governance, the Bank adheres to POJK No. 17 of 2023 on the Implementation of Corporate Governance for Commercial Banks, which emphasizes the active role of the Board of Directors and the Board of Commissioners in fostering a culture of compliance. Corporate governance is no longer merely a supervisory function, but has become a key driver in ensuring that every innovation at aligns with the principles of good corporate governance.

Komitmen terhadap perlindungan nasabah tercermin melalui penerapan POJK Nomor 22 Tahun 2023 tentang Pelindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan, di mana setiap produk dan layanan dirancang secara bertanggung jawab dengan mempertimbangkan kesesuaian terhadap profil risiko dan kebutuhan nasabah. Pendekatan ini memperkuat transparansi sekaligus meningkatkan kualitas pengalaman nasabah secara menyeluruh.

Our commitment to customer protection is reflected in the implementation of POJK No. 22 of 2023 on Consumer and Public Protection in the Financial Services Sector, under which every product and service is designed responsibly, taking into account alignment with customers' risk profiles and needs. This approach enhances transparency while improving the overall quality of the customer experience.

Integritas operasional diperkuat melalui implementasi strategi anti-fraud yang mengacu pada POJK Nomor 12 Tahun 2024 tentang Penerapan Strategi Anti Fraud bagi Lembaga Jasa Keuangan. Dengan mengedepankan empat pilar Utama yaitu pencegahan, deteksi, investigasi, dan tindak lanjut. Bank membangun sistem yang terintegrasi antara fungsi anti-fraud dan keamanan siber. Pemanfaatan teknologi, termasuk *Artificial Intelligence* (AI), menjadi bagian integral dalam meningkatkan kapabilitas deteksi dini terhadap potensi anomali transaksi. Di sisi lain, penerapan *Whistleblowing System* (WBS) dengan perlindungan pelapor menegaskan komitmen terhadap transparansi dan budaya integritas.

Operational integrity is strengthened through the implementation of an anti-fraud strategy in accordance with POJK No. 12 of 2024 on the Implementation of Anti-Fraud Strategies for Financial Services Institutions. By prioritizing the four main pillars—prevention, detection, investigation, and follow-up—the Bank has established an integrated system linking anti-fraud and cybersecurity functions. The use of technology, including Artificial Intelligence (AI), is an integral part of enhancing early detection capabilities for potential transaction anomalies. Meanwhile, the implementation of a Whistleblowing System (WBS) with whistleblower protection underscores the Bank's commitment to transparency and a culture of integrity.

Penguatan kepatuhan juga dilakukan melalui implementasi program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme sesuai POJK Nomor 8 Tahun 2023 tentang Penerapan program Anti Pencucian Uang (APU), Pencegahan Pendanaan Terorisme (PPT), dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (PPPSPM) di Sektor Jasa Keuangan serta pengelolaan teknologi informasi yang mengacu pada POJK Nomor 11/POJK.03/2022 tentang Penyelenggaraan Teknologi Informasi Oleh Bank Umum guna memastikan keamanan sistem, ketahanan siber, dan keandalan operasional. Evaluasi berkelanjutan melalui pedoman SEOJK Nomor 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum semakin memperkokoh efektivitas penerapan tata kelola di seluruh lini organisasi.

Compliance efforts are also strengthened through the implementation of Anti-Money Laundering and Counter-Terrorist Financing programs in accordance with OJK Regulation No. 8 of 2023 on the Implementation of Anti-Money Laundering (AML), Prevention of Terrorism Financing (CTF), and Prevention of Proliferation Financing of Weapons of Mass Destruction (CPWMD) in the Financial Services Sector, as well as information technology management in accordance with POJK No. 11/POJK.03/2022 on the Implementation of Information Technology by Commercial Banks to ensure system security, cybersecurity, and operational reliability. Ongoing evaluation through SEOJK Guideline No. 14/SEOJK.03/2025 on the Implementation of Corporate Governance for Commercial Banks further strengthens the effectiveness of governance implementation across all organizational levels.

Melalui pendekatan kepatuhan yang terintegrasi dan berorientasi ke depan, Bank Sahabat Sampoerna tidak hanya memenuhi kewajiban regulasi, tetapi juga memperkuat fondasi untuk tumbuh secara berkelanjutan, adaptif, dan terpercaya di tengah dinamika industri jasa keuangan

Through an integrated and forward-looking compliance approach, Bank Sahabat Sampoerna not only meets regulatory obligations but also strengthens the foundation for sustainable, adaptive, and trustworthy growth amid the dynamics of the financial services industry

Pemberlakuan Kode Etik bagi Karyawan Bank

Bank Sahabat Sampoerna telah menetapkan Kode Etik terakhir berdasarkan Surat No. 09/026/MI/SKK/IX/2024 pada 26 September 2024. Kode Etik ini berlaku bagi seluruh Dewan Komisaris, Direksi, dan karyawan Bank. Sebagai bukti komitmen terhadap prinsip etika dan integritas, seluruh karyawan telah menandatangani pernyataan yang menyatakan bahwa mereka memahami, menaati, dan akan menjalankan Kode Etik Bank Sahabat Sampoerna dalam setiap aktivitas operasional dan interaksi profesional. Penerapan Kode Etik ini menjadi salah satu fondasi utama dalam menjaga tata kelola yang baik dan membangun kepercayaan pemangku kepentingan.

Implementation of the Code of Conduct for Bank Employees

Bank Sahabat Sampoerna has adopted its latest Code of Conduct pursuant to Letter No. 09/026/MI/SKK/IX/2024 dated September 26, 2024. This Code of Conduct applies to all members of the Board of Commissioners, the Board of Directors, and Bank employees. As a demonstration of their commitment to ethical principles and integrity, all employees have signed a statement affirming that they understand, comply with, and will uphold the Bank Sahabat Sampoerna Code of Conduct in all operational activities and professional interactions. The implementation of this Code of Conduct serves as a key foundation for maintaining good governance and building stakeholder trust.

Wajib dipatuhi seluruh insan Bank di seluruh level organisasi, termasuk Dewan Komisaris dan Direksi. ***All Bank employees at all levels of the organization, including the Board of Commissioners and the Board of Directors, must comply.***	**Wajib membuat pernyataan kepatuhan terhadap Kode Etik atau menandatangani Pakta Integritas.** ***All employees must submit a statement of compliance with the Code of Conduct or sign an Integrity Pact.***	**Penerapan sanksi bagi setiap pihak yang terbukti melanggar Kode Etik.** ***Sanctions will be imposed on any party found to have violated the Code of Conduct.***

Sosialisasi dan Internalisasi Kode Etik

Bank melakukan kegiatan sosialisasi Kode Etik melalui kegiatan internal kepada seluruh karyawan secara berkala. Sosialisasi ini bertujuan untuk meningkatkan kesadaran para karyawan untuk terus menjalankan kegiatan operasional secara beretika dan berintegritas sesuai dengan Kode Etik yang telah ditetapkan dan nilai-nilai perusahaan. Sosialisasi Kode Etik Bank dilakukan melalui 2 (dua) cara, yakni:

Bank secara konsisten melaksanakan *mandatory* sosialisasi Kode Etik melalui berbagai kegiatan internal kepada seluruh karyawan namun secara berkala yaitu dua tahun sekali dengan dilakukan reminder berupa flyer oleh Compliamce Update dan di blast keseluruh email staff Bank Sahabat Sampoerna. Inisiatif ini bertujuan untuk meningkatkan pemahaman dan kesadaran insan Bank agar senantiasa menjalankan kegiatan operasional secara beretika dan berintegritas, selaras dengan Kode Etik yang telah ditetapkan serta nilai-nilai perusahaan.

Dissemination and Internalization of the Code of Conduct

The Bank conducts regular internal sessions to educate all employees about the Code of Conduct. These sessions aim to raise employees' awareness of the importance of consistently conducting business operations with ethics and integrity in accordance with the established Code of Conduct and the company's values. The Bank's Code of Conduct sessions are conducted in two ways, namely:

The Bank consistently conducts mandatory training on the Code of Conduct through various internal activities for all employees; however, this is done periodically—once every two years—with reminders in the form of flyers distributed via "Compliance Update" and sent to all Bank Sahabat Sampoerna staff via email. This initiative aims to enhance the understanding and awareness of Bank employees so that they consistently conduct operational activities with ethics and integrity, in line with the established Code of Conduct and the company's values.

Sosialisasi Kode Etik dilaksanakan melalui dua pendekatan utama, yaitu:

The dissemination of the Code of Conduct is carried out through two main approaches, namely:

E-Learning	Wajib bagi seluruh karyawan *Mandatory for all employees*
Situs Web Internal	Akses bagi karyawan terkait informasi Kode Etik. *Employee access to information regarding the Code of Conduct.*

Jenis Sanksi Pelanggaran Kode Etik
Types of Sanctions for Code of Conduct Violations

Pembinaan Periodik *Periodic Guidance*	Permintaan Ganti Rugi *Claim for Compensation*
Surat Teguran *Written Warning*	Peringatan Lisan *Verbal Warning*
Pengurangan Upah *Wage Reduction*	Pemberhentian Sementara *Temporary Suspension*
Verbal Reprimand	Pemutusan Hubungan Kerja *Termination*
Surat Peringatan 1, 2, dan 3 *Warning Letters 1, 2, and 3*	Penurunan atau Pemindahan dari Jabatan Karyawan *Demotion or Transfer of Employee Position*
Penindakan Secara Hukum *Legal Action*	

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 Conduct Violations and Follow-Up

The Bank enforces its Code of Conduct by imposing sanctions for violations in accordance with the severity of the offense. The Bank has designated the Human Resources Directorate as the entity responsible for implementing the Code of Conduct, including addressing violations that occur within the Bank. The details of sanctions imposed for violations of the Bank's Code of Conduct over the past 2 (two) years are as follows:

Sanksi *Sanctions*	**2025**	**2024**
Tindakan Disiplin Ringan *Minor Disciplinary Actions*	11	8
Tindakan Disiplin Sedang *Moderate Disciplinary Action*	7	12
Tindakan Disiplin Berat *Severe Disciplinary Action*	0	0
Jumlah ***Total***	**18**	**20**

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.

In response to the shift toward digital trends, the Bank recognizes that Information Technology (IT) management plays a strategic role in supporting the smooth operation of business activities and ensuring the security of data and information processing. Effective IT management is also believed to enhance operational efficiency and the quality of the Bank's services. Based on this, Bank Sahabat Sampoerna consistently leverages IT to provide the best products and services while minimizing the operational risks faced by the business.

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.

IT Governance was established to align the Bank's strategy with the activities of the IT Department. The implementation of this IT governance is guided by the 2024-2026 IT Strategy and applicable laws and regulations, while consistently prioritizing human resource availability, risk management, and best-in-class performance measurement, thereby creating long-term sustainability and contributing significantly to a conducive business environment.

Kebijakan dan Strategi Pengelolaan Teknologi Informasi

Information Technology Management Policies and Strategies

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* dan *Open Banking* dengan E-KYC sehingga memudahkan nasabah dalam melakukan pembukaan rekening dari mana saja.

Bank Sahabat Sampoerna has extensively adopted information technology to optimize operational activities and provide customers with convenient and practical solutions. The bank continues to develop its Digital Onboarding service, which integrates Mobile Banking and Open Banking with E-KYC, making it easier for customers to open accounts from anywhere.

Bank juga terus memaksimalkan pengendalian risiko keamanan informasi dan senantiasa menjaga kepercayaan nasabah dengan mempertahankan kepemilikan sertifikasi ISO 27001:2022 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*.

The Bank also continues to maximize information security risk control and consistently maintain customer trust by retaining its ISO 27001:2022 certification, with a scope focused on enhancing the Information Security Management System (ISMS) in the development and operations of PDaja.com, , and Sampoerna Mobile Banking, as well as the implementation of a web application firewall and a 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.
2. *Change Management*
   Prosedur pengelolaan perubahan sistem baik dari sisi aplikasi, perangkat lunak dan perangkat keras, maupun infrastruktur di area produksi.

To maximize the implementation of IT governance, the Bank has adopted the following standard procedures:

1. *System Development Life Cycle (SDLC)*
   IT procedures and governance related to system procurement, changes, and enhancements.
2. *Change Management*
   Procedures for managing system changes, including applications, software, hardware, and infrastructure in the production environment.

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.

3. Service Management
Procedures related to the provision of personnel supporting IT operations, standard escalation processes, and standard service level agreements (SLAs).
4. Data Center Operations
Standard procedures for running data center operations, including operation management, system management, network management, media storage maintenance, and ensuring the capacity and capabilities of the 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.
6. Menerapkan manajemen perubahan (*change management*) yang ketat terhadap setiap perubahan bisnis model maupun implementasi fitur baru, guna meminimalisir risiko kegagalan sistem operasional (*bank wide incident*) yang dapat mengganggu layanan di lingkungan produksi.

IT Disruption

Technological disruption refers to the fundamental changes that occur when new technologies emerge and transform how businesses operate, how consumers interact, and how industries function. To address these challenges, the Bank has implemented the following strategies:

1. Collaborating with strategic partners on the development of new technologies.
2. Product development and user experience improvements focused on maintaining user satisfaction.
3. Investing in Artificial Intelligence (AI) technology.
4. Enhancements in cybersecurity aimed at ensuring the security of user data and transactions.
5. Regulatory compliance to ensure that innovations align with existing regulations.
6. Implementing strict change management for every business model change or new feature implementation to minimize the risk of operational system failures (bank-wide incidents) that could disrupt services in the production environment.

Cyber Security

Bank Sahabat Sampoerna menyadari peningkatan layanan TI menyadari adanya peningkatan ancaman keamanan informasi. Peningkatan program terkait *Cyber Security* yang dilakukan Bank 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:

1. *Security Operation Center* - SOC 24/7.
2. *Annual Pentest dan Adhoc 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*).

Cybersecurity

Bank Sahabat Sampoerna recognizes that improvements in IT services are accompanied by an increase in information security threats. The Bank's enhanced cybersecurity programs are in accordance with SEOJK No. 29/SEOJK.03/2022. To prevent cyberattacks and threats from entering the Company via the internet, the Bank has implemented various measures, such as:

1. Security Operations Center (SOC) 24/7.
2. Annual Penetration Testing and Ad Hoc Penetration Testing.
3. Security Awareness Program for all employees and IT service providers.
4. Upgrade from Anti-Malware to Endpoint Detection and Response (EDR).
5. Enhancement of asset management capabilities.

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.
11. Peningkatan keamanan akses remote ke server kritikal menggunakan *Privileged Access Management*.
12. Penerapan keamanan akses ke aplikasi internal menggunakan *Zero Trust Network Access*.
13. Peningkatan keamanan jaringan menggunakan standar protokol Dot1X.

6. Enhancement of Identity and Access Management capabilities.
7. Upgrading network and security device capabilities.
8. Implementation of Data Loss Prevention (DLP).
9. A continuous Cybersecurity Roadmap program.
10. Establishment of a cyber incident response team.
11. Enhancing remote access security to critical servers using Privileged Access Management.
12. Implementation of security for access to internal applications using Zero Trust Network Access.
13. Enhancement of network security using the Dot1X protocol standard.

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. 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*.

Disaster Recovery

Bank Sahabat Sampoerna strives to address various potential risks and ensure operational continuity by implementing Business Continuity Management (BCM) and conducting regular Disaster Recovery Plan (DRP) tests. Disaster recovery is a preventive measure designed to safeguard all IT systems, applications, and devices against future disasters. In this regard, the Bank has implemented the following mitigation measures:

1. Conducting consistent Disaster Recovery (DR) drills once a year for each critical application system.
2. Conducting periodic capacity reviews of the infrastructure capacity related to critical application systems.
3. Conduct real-time monitoring 24 hours a day, 7 days a week (24/7) and implement an alert system for application systems directly related to customer service in accordance with alert threshold requirements.

Identifikasi dan Pengelolaan Risiko Utama yang Dilaporkan pada Direksi

Direktorat 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.

Identification and Management of Key Risks Reported to the Board of Directors

The IT Directorate of Bank Sahabat Sampoerna has established, identified, managed, and periodically reported on information technology risks to the director overseeing the IT division. Additionally, these assessments have been reported to the Risk Management Division and relevant 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 2025 adalah sebagai berikut:

Certifications Held by the Company's IT Personnel

The Bank strives to ensure that all IT personnel possess the necessary qualifications and competencies, including by participating in various IT-related certification programs. The certifications held by the Bank's IT personnel as of December 31, 2025, are as follows:

No.	Sertifikasi *Certification*	Total (orang) *Total (people)*
1.	Sertifikasi Manajemen Risiko Jenjang 4 *Level 4 Risk Management Certification*	38
2.	Sertifikasi Manajemen Risiko Jenjang 5 *Level 5 Risk Management Certification*	5
3.	Sertifikasi Manajemen Risiko Jenjang 7 *Level 7 Risk Management Certification*	1
4.	*Certified Ethical Hacking* (CEH Version 13)	1

Rencana Pengembangan TI ke Depan

Pemanfaatan TI yang berorientasi pada Rencana Strategis TI menjadi bagian penting untuk diwujudkan melalui pengembangan TI pada tahun-tahun mendatang. Hal ini mencakup pengembangan fitur, pemenuhan kapasitas, skalabilitas, dan fleksibilitas sistem TI, serta implementasi pengamanan TI yang komprehensif. Rencana pengembangan TI untuk tahun 2026 yang telah disusun diharapkan dapat memenuhi kebutuhan usaha. Bank telah menetapkan rencana pengembangan TI ke depan yang diantaranya:

1. Pengembangan terkait *Digital Onboarding & Identity Management*
2. Pengembangan terkait *Open Banking, API & Ecosystem Partnership*
3. Pengembangan terkait *Channels & Customer Experience*
4. Pengembangan fitur terkait sistem pembayaran, kartu, dan transaksi jaringan
5. Pengembangan fitur yang mendukung proses pemberian pinjaman dan penagihan
6. Pengembangan sistem pendukung transaksi valuta asing dan jaringan keuangan global
7. Pengembangan terkait *IT Infrastructure, Security & Operations*
8. Pengembangan terkait *Data Governance, AI & Analytics*
9. Pengembangan terkait *Internal Support & GRC (Governance, Risk, Compliance)*

Future IT Development Plan

The utilization of IT in line with the IT Strategic Plan is a key priority to be realized through IT development in the coming years. This includes feature development, capacity expansion, scalability, and flexibility of IT systems, as well as the implementation of comprehensive IT security measures. The IT development plan for 2026 that has been formulated is expected to meet business needs. The Bank has established future IT development plans, including:

1. *Development related to Digital Onboarding & Identity Management*
2. *Development related to Open Banking, APIs, and Ecosystem Partnerships*
3. *Development related to Channels & Customer Experience*
4. *Development of features related to payment systems, cards, and network transactions*
5. *Development of features supporting the loan origination and collections processes*
6. *Development of foreign exchange transaction support systems and global financial networks*
7. *Development related to IT Infrastructure, Security & Operations*
8. *Development related to Data Governance, AI & Analytics*
9. *Development related to Internal Support & GRC (Governance, Risk, Compliance)*

Pengendalian Gratifikasi

Gratuity 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.

Policies related to Gratuities

Gift control is a series of activities aimed at regulating the acceptance of gifts by enhancing understanding and awareness of transparent and accountable gift reporting in accordance with applicable regulations and laws. Bank Sahabat Sampoerna is committed to implementing gift control consistently and comprehensively in accordance with the memo issued by the Board of Directors No. 09/006/MI/Sisdur/II/2015 dated February 27, 2015, regarding the Provisions for Accepting Gifts from Third Parties. On the other hand, the Bank has established an exception: if, under certain conditions, refusal is deemed likely to cause offense, the relevant party may accept a gift or reward from a third party, provided that it is reported to the local Bank management or to an Executive Officer by completing the Gift Acceptance Declaration Form.

Laporan Penerimaan Hadiah dari Pihak Ketiga

Sepanjang tahun 2025, Bank telah mencatat informasi terkait penerimaan hadiah dari pihak ketiga yang disajikan pada tabel berikut:

Report on the Receipt of Gifts from Third Parties

Throughout 2025, the Bank has recorded information regarding the receipt of gifts from third parties, as presented in the following table:

Divisi/Unit Kerja/ Jabatan *Division/Work Unit/ Position*	**Tanggal Menerima Hadiah** *Date Gift Received*	**Dalam Rangka** *Occasion*	**Jenis Hadiah** *Type of Gift*	**Tanggal Pelaporan Satuan Kerja Kepatuhan** *Date of Reporting by the Compliance Unit*	**Peruntukan** *Allocation*
IT Production Support Surrounding & Regulatory	24 Maret 2025 *March 24, 2025*	Hari Raya Idul Fitri *Eid al-Fitr*	Snack Makanan Ringan *Snacks*	25 Maret 2025 *March 25, 2025*	Dibagikan kepada Tim IT *Distributed to the IT Team*
Corporate Legal Specialist	11 September 2025 *September 11, 2025*	HUT BSS ke-34 *BSS's 34th Anniversary*	Kue *Cake*	12 September 2025 *September 12, 2025*	Dibagikan *Shared*

Komitmen terhadap Anti Korupsi

Commitment to Anti-Corruption

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.

The Board of Commissioners, the Board of Directors, and all Bank employees consistently uphold fair competition, the values of sportsmanship and professionalism, and the principles of Good Corporate Governance (GCG). The Bank is also committed to fostering a healthy business environment, avoiding actions, behaviors, or conduct that may lead to conflicts of interest, Corruption, Collusion, and Nepotism (KKN), and always prioritizing the Bank's interests over personal, family, group, or factional interests. The Bank also consistently adheres to anti-corruption policies as stipulated in Law No. 20 of 2001 amending Law No. 31 of 1999 on the Eradication of Corruption Offenses.

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.

Anti-Corruption Awareness Campaign at the Company

The principles of the anti-bribery and anti-corruption policy are set forth in the Bank's Code of Conduct, which outlines the values upheld by the Bank and establishes standards of conduct for all Bank personnel. This serves as a statement of the Bank's principles and commitment to supporting anti-bribery and anti-corruption practices, which are also classified as acts of fraud. The implementation of this Code of Conduct also aims to protect the Bank and all employees from negative impacts such as legal risks, financial losses, and reputational damage, and to maintain the trust of all shareholders, stakeholders, and the general public.

Perkara Penting dan Sanksi Administratif

Significant Matters and Administrative Sanctions

Perkara Penting yang Dihadapi oleh Bank, Dewan Komisaris, dan Direksi yang Menjabat Tahun 2025

Significant Legal Matters Faced by the Bank, the Board of Commissioners, and the Board of Directors in 2025

Perkara hukum yang dihadapi oleh Bank sepanjang tahun 2025 diuraikan sebagai berikut:

The legal matters faced by the Bank throughout 2025 are outlined as follows:

Permasalahan Hukum *Legal Issues*	**Total Kasus** *Total Cases*	
	Perdata *Civil*	**Pidana** *Criminal*
Telah mendapat putusan yang mempunyai kekuatan hukum tetap *Cases for which a final and binding judgment has been rendered*	7	-
Dalam proses penyelesaian *In the process of resolution*	11	46
Jumlah ***Total***	**18**	**46**

Pokok Perkara *Subject Matter*	**Status Penyelesaian** *Resolution Status*	**Pengaruh terhadap Kondisi Bank** *Impact on the Bank's Condition*	**Risiko yang Dihadapi** *Risks*	**Sanksi Administrasi yang Diterima** *Administrative Sanctions Received*
Kasus Perdata ***Civil Case***				
Perkara Gugatan atas nama Shintalia Megrath terkait Nasabah Herry Adi Prawira *Lawsuit filed on behalf of Shintalia Megrath regarding customer Herry Adi Prawira*	Perkara telah diputus di Tingkat Pengadilan Negeri dengan amarnya menyatakan gugatan penggugat tidak dapat diterima *The case was decided at the District Court level, with the ruling stating that the plaintiff's claim was dismissed*	Nihil *None*	Adanya tuntutan dari Pihak Ketiga *Claims by Third Parties*	Nihil *None*
Perkara Gugatan atas nama Moel Santoso Sayono terkait Nasabah Endang Irawaty *Lawsuit filed on behalf of Moel Santoso Sayono regarding client Endang Irawaty*	Perkara telah dicabut oleh Penggugat *The case has been withdrawn by the Plaintiff*	Nihil *None*	Adanya tuntutan dari Pihak Ketiga *Claims by a Third Party*	Nihil *None*
Perkara Gugatan atas nama Silvi Yani Krisnawati dan Irvan Surya Lesmana terkait Nasabah PT Irma Mojang Wisata *Lawsuit filed on behalf of Silvi Yani Krisnawati and Irvan Surya Lesmana regarding customer PT Irma Mojang Wisata*	Perkara telah diputus di Tingkat Pengadilan Negeri dengan amarnya menyatakan gugatan penggugat tidak dapat diterima *The case was decided at the District Court level with a ruling stating that the plaintiff's lawsuit was not admissible*	Nihil *None*	Adanya tuntutan dari Pihak Ketiga *Claims by third parties*	Nihil *None*
Perkara Gugatan atas nama Moel Santoso Sayono terkait Nasabah Endang Irawaty *Lawsuit filed on behalf of Moel Santoso Sayono regarding customer Endang Irawaty*	Perkara telah diputus di Tingkat Pengadilan Negeri dengan amarnya menyatakan gugatan penggugat tidak dapat diterima *The case was decided at the District Court level with a ruling stating that the plaintiff's lawsuit was inadmissible*	Nihil *None*	Adanya tuntutan dari Pihak Ketiga *Claims by third parties*	Nihil *None*

Pokok Perkara *Subject Matter*	**Status Penyelesaian** *Resolution Status*	**Pengaruh terhadap Kondisi Bank** *Impact on the Bank's Condition*	**Risiko yang Dihadapi** *Risks*	**Sanksi Administrasi yang Diterima** *Administrative Sanctions Received*
Perkara Gugatan atas nama Ardy Putra Sulimin terkait Nasabah Andereas *Lawsuit filed on behalf of Ardy Putra Sulimin regarding the " " of customer Andereas*	Perkara telah diputus di Tingkat Pengadilan Negeri dengan amarnya menyatakan gugatan Penggugat tidak dapat diterima (N.O). Ditingkat Pengadilan Tinggi gugatan Penggugat telah putus dengan amar menolak seluruh gugatan Penggugat. *The case was decided at the District Court level, with the judgment declaring the Plaintiff's claim inadmissible (N.O.). At the High Court level, the Plaintiff's claim was decided with a judgment dismissing the Plaintiff's entire claim.*	Nihil *None*	Adanya tuntutan dari Pihak Ketiga *Claims by a Third Party*	Nihil *None*
Perkara Gugatan dari Nasabah Dakka A.R. Sihombing *Lawsuit filed by customer Dakka A.R. Sihombing*	Perkara telah diputus di Tingkat Pengadilan Negeri dengan amarnya menyatakan gugatan Penggugat tidak dapat diterima (N.O) *The case was decided at the District Court level with a ruling stating that the Plaintiff's claim was not admissible (N.O)*	Nihil *None*	Adanya tuntutan dari Nasabah *Claims by Customers*	Nihil *None*
Perkara Gugatan dari Nasabah PT Galatia Mas *Lawsuit filed by a customer of PT Galatia Mas*	Perkara telah diputus di Tingkat Pengadilan Negeri dengan amarnya menyatakan menolak seluruh gugatan Penggugat *The case was decided at the District Court level with a ruling rejecting the Plaintiff's entire claim*	Nihil *None*	Adanya tuntutan dari Nasabah *Claims filed by customers*	Nihil *None*
Perkara Gugatan dari Nasabah Eius Hodijah *Lawsuit Filed by Customer Eius Hodijah*	Perkara masih dalam tahap persidangan *Case is still in the trial phase*	Nihil *None*	Adanya tuntutan dari Nasabah *Claims from Customers*	Nihil *None*
Perkara Gugatan atas nama Maryati terkait Nasabah Santosi *Lawsuit filed on behalf of Maryati regarding Customer Santosi*	Perkara dicabut oleh Penggugat *Case withdrawn by the Plaintiff*	Nihil *None*	Adanya tuntutan dari Pihak Ketiga *Claims from third parties*	Nihil *None*
Perkara Gugatan dari Nasabah Arif Rachman *Lawsuit filed by customer Arif Rachman*	Perkara masih dalam tahap persidangan *Case still in trial*	Nihil *None*	Adanya tuntutan dari Nasabah *Claims from Customers*	Nihil *None*
Perkara Gugatan dari Nasabah Zulfa Majidah *Lawsuit filed by customer Zulfa Majidah*	Perkara masih dalam tahap persidangan *Case is still in the trial stage*	Nihil *None*	Adanya tuntutan dari Nasabah *Claims filed by customers*	Nihil *None*
Perkara Gugatan Hubungan Industrial atas nama Johan Wijaya *Industrial Relations Lawsuit on behalf of Johan Wijaya*	Atas perkara telah diputus di tingkat Pengadilan Negeri dengan amarnya mengabulkan gugatan Penggugat sebagian. *The case has been decided at the District Court level, with the court granting the Plaintiff's claim in part.*	Nihil *None*	Adanya tuntutan dari ex-karyawan *Claims by former employees*	Nihil *None*
Perkara Gugatan dari Nasabah Kurniawan *Lawsuit filed by customer Kurniawan*	Perkara telah diputus dengan amarnya menyatakan gugatan Penggugat tidak dapat diterima (N.O.) *The case has been decided with a ruling stating that the Plaintiff's lawsuit is not admissible (N.O.)*	Nihil *None*	Adanya tuntutan dari Nasabah *Claims from customers*	Nihil *None*
Perkara Gugatan dari Nasabah Ane Marlina *Lawsuit filed by Customer Ane Marlina*	Perkara masih dalam tahap persidangan *Case still in trial*	Nihil *None*	Adanya tuntutan dari Nasabah *Claims filed by customers*	Nihil *None*

Pokok Perkara *Subject Matter*	**Status Penyelesaian** *Resolution Status*	**Pengaruh terhadap Kondisi Bank** *Impact on the Bank's Condition*	**Risiko yang Dihadapi** *Risks*	**Sanksi Administrasi yang Diterima** *Administrative Sanctions Received*
Perkara Gugatan dari Nasabah PT Krakatau Jaya Abadi *Lawsuit filed by a customer of PT Krakatau Jaya Abadi*	Perkara masih dalam tahap persidangan *Case is still in the trial stage*	Nihil *None*	Adanya tuntutan dari Nasabah *Claims filed by customers*	Nihil *None*
Perkara Gugatan atas nama Derwin Jepara terkait Nasabah CV Hudai Mekar *Lawsuit filed on behalf of Derwin Jepara regarding a customer of CV Hudai Mekar*	Perkara telah diputus dengan amarnya menyatakan gugatan Penggugat tidak dapat diterima (N.O.) *The case has been decided with a ruling stating that the Plaintiff's lawsuit is not admissible (N.O.)*	Nihil *None*	Adanya tuntutan dari Pihak Ketiga *Claims by Third Parties*	Nihil *None*
Perkara Gugatan dari Nasabah Ari Alpian *Lawsuit filed by customer Ari Alpian*	Perkara masih dalam tahap persidangan *Case is still in the trial stage*	Nihil *None*	Adanya tuntutan dari Nasabah *Claims from customers*	Nihil *None*
Perkara Gugatan dari Nasabah Bachtari Sy Ba *Lawsuit filed by customer Bachtari Sy Ba*	Perkara masih dalam tahap persidangan *Case is still in the trial stage*	Nihil *None*	Adanya tuntutan dari Nasabah *Claims filed by customers*	Nihil *None*
Kasus Pidana ***Criminal Cases***				
Panggilan Saksi dari Polres Jakarta Pusat, yang berkaitan dengan Nasabah Isodorus Iswardjo *Witness summons from the Central Jakarta Police, related to customer Isodorus Iswardjo*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of Bank employees by the Police*	Nihil *None*
Panggilan Saksi dari Polresta Bandung, yang berkaitan dengan Nasabah Adrian Wage Wicaksono *Witness summons from the Bandung City Police, related to customer Adrian Wage Wicaksono*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polresta Samarinda, yang berkaitan dengan Nasabah Fauzi *Witness Summons from the Samarinda City Police ( ), regarding customer Fauzi*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Police summons of bank employees*	Nihil *None*
Panggilan Saksi dari Polda Gorontalo, yang berkaitan dengan Nasabah PT Solusi Pembayaran Nasional *Witness summons from the Gorontalo Regional Police, related to a customer of PT Solusi Pembayaran Nasional*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah Albi Redha *Witness summons from the Metro Jaya Regional Police, related to customer Albi Redha*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polrestabes Makassar, yang berkaitan dengan Nasabah PT Solusi Pembayaran Nasional *Witness summons from the Makassar City Police, related to a customer of PT Solusi Pembayaran Nasional*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*

Pokok Perkara *Subject Matter*	**Status Penyelesaian** *Resolution Status*	**Pengaruh terhadap Kondisi Bank** *Impact on the Bank's Condition*	**Risiko yang Dihadapi** *Risks*	**Sanksi Administrasi yang Diterima** *Administrative Sanctions Received*
Panggilan Saksi dari Polres Balerang, yang berkaitan dengan Nasabah PT Indoraya Sehati Remittance *Witness Summons from the Balerang Police Station regarding a customer of PT Indoraya Sehati Remittance*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Police summons of bank employees*	Nihil *None*
Panggilan Saksi dari Polres Jakarta Selatan, yang berkaitan dengan Nasabah Miriam Ambarini *Witness summons from the South Jakarta Police, related to customer Miriam Ambarini*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Bareskrim Mabes Polri, yang berkaitan dengan Nasabah PT Indoraya Sehati Remittance *Witness summons from the Criminal Investigation Department of the National Police Headquarters, regarding a customer of PT Indoraya Sehati Remittance*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Bareskrim Mabes Polri *Witness summons from the Criminal Investigation Department of the National Police Headquarters*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Bareskrim Mabes Polri, yang berkaitan dengan laporan polisi pihak ketiga *A summons from the Criminal Investigation Division of the National Police Headquarters regarding a third-party police report*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Gorontalo, yang berkaitan dengan Nasabah PT Solusi Pembayaran Nasional *Witness summons from the Gorontalo Regional Police, related to a customer of PT Solusi Pembayaran Nasional*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Bareskrim Mabes Polri, yang berkaitan dengan Nasabah PT Solusi Pembayaran Nasional *Witness summons from the Criminal Investigation Department of the National Police Headquarters, related to a customer of PT Solusi Pembayaran Nasional*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Jawa Barat, yang berkaitan dengan Nasabah PT Solusi Pembayaran Nasional & PT Indoraya Sehati Remittance *Witness summons from the West Java Regional Police, related to customers of PT Solusi Pembayaran Nasional & PT Indoraya Sehati Remittance*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of Bank employees by the Police*	Nihil *None*

Pokok Perkara *Subject Matter*	**Status Penyelesaian** *Resolution Status*	**Pengaruh terhadap Kondisi Bank** *Impact on the Bank's Condition*	**Risiko yang Dihadapi** *Risks*	**Sanksi Administrasi yang Diterima** *Administrative Sanctions Received*
Laporan Pidana ke Polda Metro Jaya, yang berkaitan dengan Pihak Ketiga atas nama Gunadi dan Felicia Yuwono *Criminal Report filed with the Jakarta Metropolitan Police, regarding third parties named Gunadi and Felicia Yuwono*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Police summons of bank employees*	Nihil *None*
Panggilan Saksi dari Polda Jawa Barat, yang berkaitan dengan Nasabah PT Solusi Pembayaran Nasional *Witness summons from the West Java Regional Police, regarding and a customer of PT Solusi Pembayaran Nasional*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of Bank employees by the Police*	Nihil *None*
Panggilan Saksi dari Polres Balerang, yang berkaitan dengan Nasabah PT Solusi Pembayaran Nasional *Witness summons from the Balerang Police Station, related to a customer of PT Solusi Pembayaran Nasional*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Solusi Pembayaran Nasional *Witness summons from the Metro Jaya Regional Police, related to a customer of PT Solusi Pembayaran Nasional*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Solusi Pembayaran Nasional *Subpoena from the Jakarta Metropolitan Police, regarding a customer of PT Solusi Pembayaran Nasional*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Police summons of bank employees*	Nihil *None*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Indoraya Sehati Remitance *Witness summons from the Metro Jaya Regional Police, related to a customer of PT Indoraya Sehati Remitance*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polres Jakarta Timur, yang berkaitan dengan adanya laporan polisi pihak ketiga terhadap Nasabah Jacobus Tolimau *Witness summons from the East Jakarta Police, related to a third-party police report against customer Jacobus Tolimau*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of Bank employees by the Police*	Nihil *None*
Panggilan Saksi dari Polda Jawa Tengah, yang berkaitan dengan Nasabah PT Silot Technology Indonesia *Witness summons from the Central Java Regional Police, related to a customer of PT Silot Technology Indonesia*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *The police summoned a bank employee*	Nihil *None*

Pokok Perkara *Subject Matter*	**Status Penyelesaian** *Resolution Status*	**Pengaruh terhadap Kondisi Bank** *Impact on the Bank's Condition*	**Risiko yang Dihadapi** *Risks*	**Sanksi Administrasi yang Diterima** *Administrative Sanctions Received*
Panggilan Saksi dari Bareskrim Mabes Polri, yang berkaitan dengan Nasabah PT Silot Technology Indonesia *A summons as a witness from the Criminal Investigation Division (Bareskrim) of the National Police Headquarters, related to a customer of PT Silot Technology Indonesia*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polres Bantul, yang berkaitan dengan laporan polisi pihak ketiga *Witness summons from the Bantul District Police, related to a third-party police report*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of Bank employees by the Police*	Nihil *None*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Silot Technology Indonesia *Witness summons from the Metro Jaya Regional Police, related to a customer of PT Silot Technology Indonesia*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polres Metro Bekasi, yang berkaitan dengan Nasabah Yohanes Ardiyono *Witness summons from the Bekasi Metro Police, related to customer Yohanes Ardiyono*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *The police summoned a bank employee*	Nihil *None*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Dompet Harapan Bangsa (OY) *A summons as a witness from the Jakarta Metropolitan Police, related to a customer of PT Dompet Harapan Bangsa (OY)*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Indoraya Sehati Remitance *Witness summons from the Metro Jaya Regional Police, related to a customer of PT Indoraya Sehati Remitance*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Jawa Barat, yang berkaitan dengan Nasabah PT Silot Technology Indonesia *Witness summons from the West Java Regional Police, related to a customer of PT Silot Technology Indonesia*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Silot Technology Indonesia *Witness summons from the Metro Jaya Regional Police, related to a customer of PT Silot Technology Indonesia*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *The police have summoned a bank employee*	Nihil *None*

Pokok Perkara *Subject Matter*	**Status Penyelesaian** *Resolution Status*	**Pengaruh terhadap Kondisi Bank** *Impact on the Bank's Condition*	**Risiko yang Dihadapi** *Risks*	**Sanksi Administrasi yang Diterima** *Administrative Sanctions Received*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Silot Technology Indonesia *A summons as a witness from the Jakarta Metropolitan Police, related to a customer of PT Silot Technology Indonesia*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Silot Technology Indonesia *Witness summons from the Jakarta Metropolitan Police, related to a customer of PT Silot Technology Indonesia*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Jawa Timur, yang berkaitan dengan Nasabah PT Sinar Digital Terdepan *Witness summons from the East Java Regional Police, related to a customer of PT Sinar Digital Terdepan*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Bareskrim Mabes Polri, yang berkaitan dengan Nasabah PT Solusi Pembayaran Nasional *Witness summons from the Criminal Investigation Department of the National Police Headquarters, related to a customer of PT Solusi Pembayaran Nasional*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *The police summoned the bank employee*	Nihil *None*
Panggilan Saksi dari Bareskrim Mabes Polri, yang berkaitan dengan Nasabah PT Dompet Harapan Bangsa & PT Silot Techonolgy Indonesia *Witness summons from the Criminal Investigation Division (Bareskrim) of the National Police Headquarters, related to customers of PT Dompet Harapan Bangsa & PT Silot Technology Indonesia*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Dompet Harapan Bangsa *Witness summons from the Jakarta Metropolitan Police, related to a customer of PT Dompet Harapan Bangsa*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Jawa Barat, yang berkaitan dengan Nasabah PT Silot Techonolgy Indonesia *Witness summons from the West Java Regional Police, related to a customer of PT Silot Technology Indonesia*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*

Pokok Perkara *Subject Matter*	**Status Penyelesaian** *Resolution Status*	**Pengaruh terhadap Kondisi Bank** *Impact on the Bank's Condition*	**Risiko yang Dihadapi** *Risks*	**Sanksi Administrasi yang Diterima** *Administrative Sanctions Received*
Panggilan Saksi dari Polda Bareskrim Mabes Polri, yang berkaitan dengan Nasabah PT Mahkota Inti Persada *Witness summons from the Criminal Investigation Department of the National Police Headquarters, related to a customer of PT Mahkota Inti Persada*	Masih dalam proses pemeriksaan di Kepolisian *The case is still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *The police have summoned a bank employee*	Nihil *None*
Panggilan Saksi dari Polres Jakarta Timur, yang berkaitan dengan Nasabah Muhammad Arafah *Witness summons from the East Jakarta Police Station ( ) regarding customer Muhammad Arafah*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summon by the Jakarta Timur Police ( ) of a Bank employee*	Nihil *None*
Panggilan Saksi dari Polrestabes Makassar yang berkaitan dengan Nasabah Andi Samsul Alam *Witness summons from the Makassar City Police related to customer Andi Samsul Alam*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Bareskrim Mabes Polri yang berkaitan dengan Nasabah KSP Artha Mitra Abadi Jaya *Witness summons from the Criminal Investigation Division ( ) of the National Police Headquarters regarding KSP Artha Mitra Abadi Jaya customer*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Bareskrim Mabes Polri, yang berkaitan dengan Nasabah PT Indoraya Sehati Remittance, PT Solusi Pembayaran Nasional dan PT Silot Technology Indonesia *Subpoena from the Criminal Investigation Division of the National Police Headquarters regarding customers of PT Indoraya Sehati Remittance, PT Solusi Pembayaran Nasional, and PT Silot Technology Indonesia*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polres Metro Depok yang berkaitan dengan Nasabah Maskur *Witness summons from the Depok Metro Police Criminal Investigation Unit ( ) regarding customer Maskur*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Silot Techonolgy Indonesia *Witness summons from the Metro Jaya Regional Police, related to a customer of PT Silot Technology Indonesia*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*

Pokok Perkara *Subject Matter*	**Status Penyelesaian** *Resolution Status*	**Pengaruh terhadap Kondisi Bank** *Impact on the Bank's Condition*	**Risiko yang Dihadapi** *Risks*	**Sanksi Administrasi yang Diterima** *Administrative Sanctions Received*
Panggilan Saksi dari Polda Metro Jaya, yang berkaitan dengan Nasabah PT Silot Techonolgy Indonesia *Witness summons from the Jakarta Metropolitan Police, related to a customer of PT Silot Technology Indonesia*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Polda Jawa Timur, yang berkaitan dengan Nasabah PT Solusi Pembayaran Nasional *A summons as a witness from the East Java Regional Police, related to a customer of PT Solusi Pembayaran Nasional*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*
Panggilan Saksi dari Bareskrim Mabes Polri yang berkaitan dengan Nasabah Molly Chandra *Witness summons from the Criminal Investigation Department of the National Police Headquarters regarding customer Molly Chandra*	Masih dalam proses pemeriksaan di Kepolisian *Still under investigation by the police*	Nihil *None*	Adanya panggilan dari Kepolisian terhadap karyawan Bank *Summoning of bank employees by the police*	Nihil *None*

Sanksi Administratif

Pada tahun 2025, terdapat sanksi administratif yang diterima Bank dari Regulator dengan rincian sebagai berikut:

Administrative Sanctions

In 2025, the Bank received administrative sanctions from the Regulator, with the following details:

Tanggal *Date*	**Keterangan** *Description*	**Kerugian Aktual (Rp)** *Actual Loss (Rp)*
24 Maret 2025 *March 24, 2025*	Pengenaan Sanksi Kewajiban Membayar Atas Koreksi di Luar Batas Waktu Penyampaian Laporan KI Risiko Mingguan Laporan Bank Umum Terintegrasi (LBUT) *Imposition of a Payment Obligation Sanction for Corrections Made After the Deadline for Submission of the Weekly Risk Information Report (KI) for the Integrated Commercial Bank Report (LBUT)*	1.200.000
6 Mei 2025 *May 6, 2025*	Pengenaan Sanksi Kewajiban Membayar Atas Koreksi di Luar Batas Waktu Penyampaian Laporan Bulanan Bank Umum Terintegrasi (LBUT) *Imposition of Penalties for Failure to Pay Due to Corrections Made After the Deadline for Submission of the Integrated Commercial Bank Monthly Report (LBUT)*	450.000
5 Mei 2025 *May 5, 2025*	Denda Adjustmen Tahunan Tahap I – 2025 *Phase I Annual Adjustment Penalty - 2025*	1.943.861
10 Juni 2025 *June 10, 2025*	Keterlambatan dalam menyampaikan koreksi laporan debitur periode penyampaian laporan bulan Januari 2025 *Delay in submitting corrections to debtor reports for the January 2025 reporting period*	50.000
25 Juni 2025 *June 25, 2025*	Pengenaan Sanksi Kewajiban Membayar Atas Koreksi di Luar Batas Waktu Penyampaian Laporan Bulanan Bank Umum Terintegrasi (LBUT) *Imposition of Penalties for Corrections Made After the Deadline for Submission of Integrated Commercial Bank Monthly Reports (LBUT)*	2.600.000
14 Agustus 2025 *August 14, 2025*	Pengenaan Sanksi Kewajiban Membayar Atas Koreksi di Luar Batas Waktu Penyampaian Laporan Bulanan Bank Umum Terintegrasi (LBUT) *Imposition of Penalties for Failure to Pay Corrections Outside the Submission Deadline for Integrated Commercial Bank Monthly Reports (LBUT)*	1.150.000
12 September 2025 *September 12, 2025*	Sanksi LBUT KI SPJK Harian *Daily LBUT KI SPJK Penalty*	2.000.000
8 November 2025 *November 8, 2025*	Sanksi Terlambat Menyampaikan Koreksi Laporan LBUT KI Februari s/d Mei 2025 dan Juli 2025 *Penalty for Late Submission of LBUT KI Report Corrections for February through May 2025 and July 2025*	850.000

Tanggal *Date*	**Keterangan** *Description*	**Kerugian Aktual (Rp)** *Actual Loss (Rp)*
11 November 2025 *November 11, 2025*	Pembebanan Sanksi Kewajiban Membayar atas Transaksi Credit Transfer Request (CTR) Kode Error U194 *Imposition of Penalty for Failure to Pay on Credit Transfer Request (CTR) Transactions with Error Code U194*	5.000.000
15 Desember 2025 *December 15, 2025*	Pengenaan Sanksi Kewajiban Membayar Atas Koreksi di Luar Batas Waktu Penyampaian Laporan Bulanan Bank Umum Terintegrasi (LBUT) *Imposition of Penalties for Failure to Pay Due to Corrections Made After the Deadline for Submission of the Integrated Commercial Bank Monthly Report (LBUT)*	100.000
16 Desember 2025 *December 16, 2025*	Sanksi administratif atas keterlambatan dalam menyampaikan laporan dan/atau koreksi laporan debitur melalui Sistem Layanan Informasi Keuangan (SLIK) periode penyampaian laporan bulan Juni dan September 2025 *Administrative sanctions for late submission of reports and/or corrections to debtor reports through the Financial Information Service System (SLIK) for the June and September 2025 reporting periods*	1.450.000
17 Desember 2025 *December 17, 2025*	Pengenaan Sanksi Kewajiban Membayar Atas Koreksi di Luar Batas Waktu Penyampaian Laporan Bulanan Bank Umum Terintegrasi (LBUT) *Imposition of Payment Obligation Sanctions for Corrections Made Outside the Submission Deadline for Integrated Commercial Bank Monthly Reports (LBUT)*	100.000
22 Desember 2025 *December 22, 2025*	Sanksi administratif atas keterlambatan dalam menyampaikan laporan dan/atau koreksi laporan debitur melalui Sistem Layanan Informasi Keuangan (SLIK) untuk periode penyampaian laporan periode bulan April, Mei, Juli dan Agustus 2025 *Administrative penalty for late submission of reports and/or corrections to debtor reports via the Financial Information Service System (SLIK) for the reporting periods of April, May, July, and August 2025*	750.000
24 Desember 2025 *December 24, 2025*	Sanksi Administratif Hasil Pemeriksaan Tahun 2025 *Administrative Sanctions Resulting from the 2025 Inspection*	14.800.000

Sistem Pelaporan Pelanggaran

Whistleblowing System

Whistleblowing System (WBS) merupakan sebuah mekanisme 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.

Whistleblowing System/WBS is a mechanism provided by the Bank to report violations, including legal violations, unethical or immoral acts, or other acts that may tarnish the reputation of or cause harm to the organization or its stakeholders.

Bank Sahabat Sampoerna menerapkan WBS untuk menindaklanjuti pelanggaran dengan tujuan dari pembentuk sistem tersebut, yaitu:

1. Mencegah terjadinya penyimpangan;
2. Mengoptimalkan peran serta seluruh karyawan dalam mengungkapkan pelanggaran yang terjadi di lingkungan Bank;
3. Menciptakan lingkungan kerja yang kondusif; dan
4. Menjaga reputasi Bank Sahabat Sampoerna.

Bank Sahabat Sampoerna implements the WBS to address violations in accordance with the system's objectives, namely:

1. *Preventing misconduct;*
2. *Optimizing the participation of all employees in disclosing violations occurring within the Bank;*
3. *Creating a conducive work environment; and*
4. *Maintaining the reputation of Bank Sahabat Sampoerna.*

Prinsip Dasar Pelaporan Pelanggaran

Bank Sahabat Sampoerna menyediakan sistem pelaporan pelanggaran bagi seluruh karyawan internal 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.

Basic Principles of Reporting Violations

Bank Sahabat Sampoerna provides a violation reporting system for all internal Bank employees. Parties wishing to report a violation must be able to provide clear information regarding the type of report, the parties involved, the location and time of the violation, as well as evidence of the violation that occurred. Additionally, to facilitate the identification and follow-up process, the Bank requests that the reporter disclose their personal information and submit the report accompanied by concrete evidence, without any personal interest.

Implementasi Internal

Mekanisme pelaporan dilaksanakan secara internal mengacu kepada ketentuan internal khususnya terkait dengan penanganan laporan yang disampaikan secara internal Bank.

Laporan dapat disampaikan kepada Pengelola WBS melalui e-mail (sahabat.laporfraud@banksampoerna.com) atau Whatsapp ke nomor 081901500035.

Mekanisme Penyampaian Laporan Pelanggaran Bank telah menyusun mekanisme penyampaian laporan pelanggaran yang diuraikan sebagai berikut:

Internal Implementation

The reporting mechanism is implemented internally in accordance with internal regulations, particularly those related to the handling of reports submitted internally within the Bank.

Reports may be submitted to the WBS Administrator via email (sahabat.laporfraud@banksampoerna.com) or WhatsApp at 081901500035.

Mechanism for Submitting Reports of Violations the Bank has established a mechanism for submitting reports of violations, as outlined below:

Pelapor *Whistleblowers*	**Pengelola WBS** *WBS Management Team*	**Pemeriksa Internal** *Internal Auditor*	**Unit Kerja Terkait** *Relevant Work Unit*
Pelapor menyampaikan laporannya beserta bukti melalui email/WA. *The reporter submits the report along with evidence via email/WA.*	Melakukan review atas laporan dan bukti dari pelapor untuk dilakukan validasi lebih lanjut oleh tim pemeriksa internal. *Review the report and evidence submitted by the reporter for further validation by the internal audit team.*	Melakukan validasi dan investigasi lebih lanjut kemudian mengeluarkan laporan hasil investigasi yang berisi rekomendasi sanksi jika terbukti. *Conduct further validation and investigation, and then issue an investigation report containing recommendations for sanctions if the allegations are proven.*	Pimpinan Unit Kerja (PUK) dan HC akan menindaklanjuti rekomendasi berdasarkan laporan hasil investigasi. *The Unit Head (PUK) and HC will follow up on the recommendations based on the investigation report.*

Pelindungan bagi Pelapor

Pelindungan bagi pelapor wajib diberikan oleh Bank agar pihak yang memberikan laporan merasa aman dan nyaman, serta terhindar dari tindakan diskriminasi pihak yang terlapor. Pelindungan tersebut diberikan dalam bentuk menjamin kerahasiaan identitas pelapor dan laporannya, serta pelapor berhak menerima perkembangan laporan beserta tindak lanjutnya. Selain itu, Bank senantiasa memastikan pengelola WBS menjaga kerahasiaan laporan pelanggaran yang ditindaklanjuti dan tidak menyebarluaskan informasi terkait laporan tersebut, kecuali kepada pelapor atau pihak yang terkait dengan aduan.

Protection for Whistleblowers

The Bank is required to provide protection for whistleblowers so that those who file reports feel safe and comfortable, and are protected from discrimination by the party being reported. This protection is provided by ensuring the confidentiality of the whistleblower's identity and the report, and the whistleblower has the right to receive updates on the report and its follow-up. Additionally, the Bank consistently ensures that WBS administrators maintain the confidentiality of reported violations being addressed and do not disclose information related to such reports, except to the whistleblower or parties involved in the complaint.

Laporan Pengaduan

Sepanjang tahun 2025, Bank telah menerima laporan pengaduan yang diungkapkan pada tabel berikut:

Complaint Report

Throughout 2025, the Bank received the complaints reported in the following table:

Jumlah Pengaduan *Number of Complaints*	**Tindak Lanjut** *Follow-up*		
	Belum Diproses *Not Yet Processed*	**Dalam Proses** *In Process*	**Selesai** *Resolved*
23	0	0	23

Sanksi atau Tindak Lanjut atas Pengaduan yang Selesai Diproses

Setiap laporan pengaduan yang diterima akan ditindaklanjuti oleh PUK terkait dengan transparan dan objektif. Selama tahun 2025, terdapat 18 karyawan yang dilaporkan melakukan pelanggaran dan terbukti sehingga dikenakan sanksi, yang dijelaskan pada tabel berikut:

Sanctions or Follow-Up on Complaints That Have Been Processed

Every complaint report received will be followed up by the relevant PUK in a transparent and objective manner. During 2025, there were 18 employees reported for violations and found guilty, resulting in sanctions, as detailed in the following table:

Tahun *Year*	**Surat Teguran** *Warning Letter*	**SP 1-3** *1st – 3rd Warning*	**SP Pertama & Terakhir** *First & Final Written Warning*	**PHK** **Termination**	**Total**
2025	5	6	7	0	18
2024	4	4	12	0	20

Internal Fraud

Internal fraud yang terjadi di Bank dalam kurun waktu 2 (dua) tahun terakhir diungkapkan sebagai berikut:

Internal Fraud

Internal fraud that has occurred at the Bank over the past 2 (two) years is disclosed as follows:

Uraian *Description*	**Jumlah Kasus yang Dilakukan oleh** *Number of Cases Committed by*					
	Anggota Dewan Komisaris dan Direksi *Members of the Board of Commissioners and Directors*		**Pegawai Tetap** *Permanent Employees*		**Pegawai Tidak Tetap** *Non-Permanent Employees*	
	2025	**2024**	**2025**	**2024**	**2025**	**2024**
Total Fraud	Nihil *None*	Nihil *None*	1	2	Nihil *None*	Nihil *None*
Telah Diselesaikan *Settled*	Nihil *None*	Nihil *None*	1	2	Nihil *None*	Nihil *None*
Dalam Proses Penyelesaian Internal Bank *Under Internal Bank Resolution*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*
Belum Diupayakan Penyelesaian *No Resolution Attempted*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*
Telah Ditindaklanjuti melalui Proses Hukum *Has Been Followed Up Through Legal Proceedings*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*

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 akhir tahun 2025, persentase penyediaan dana terbesar berada pada sektor ekonomi aktivitas keuangan dan asuransi , 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 pada akhir tahun 2025 diuraikan sebagai berikut:

Provision of Funds to Related Parties and Large Funds

Bank Sahabat Sampoerna has mechanisms and policies in place regarding the provision of funds to related parties and to borrowers in large amounts. In this regard, the Bank upholds the principle of prudence by conducting thorough reviews in accordance with internal policies and Bank Indonesia regulations regarding the Legal Lending Limit (LLL). Additionally, the provision of funds must be approved by the Independent Commissioners.

As of the end of 2025, the largest percentage of funds was allocated to the financial and insurance sector , in accordance with applicable laws and regulations, with no instances of exceeding limits or violations. Information regarding the provision of funds to related parties and large counterparties at Bank as of the end of 2025 is outlined as follows:

Penyediaan Dana *Funding*	**Total**	
	Debitur *Borrower*	**Nominal (dalam jutaan Rupiah)** *Amount (in millions of Rupiah)*
Kepada Pihak Terkait *To Related Parties*	4	188.029
Kepada Debitur Inti *To Core Borrowers*		
Individu *Individual*	9	2.657.179
Grup *Group*	6	2.276.239

Pemberian Dana Kegiatan Sosial dan/atau Politik

Donations 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, sebagaimana diatur pada Kebijakan Kode Etika Karyawan dan Ketentuan terkait lainnya yang berlaku di internal Bank.

Bank Sahabat Sampoerna is committed to addressing social and community issues through its corporate social and environmental responsibility programs. This policy is part of the Bank's efforts to create a positive, long-term impact on the broader public. Additionally, the Bank's internal policies prohibit the Bank, including its employees from engaging in political activities, such as providing funds for political purposes. This policy is implemented to safeguard the independence and professionalism of the Bank and its employees, as stipulated in the Employee Code of Ethics and other relevant internal regulations of the Bank.

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 mengacu kepada pedoman penyelesaian kredit bermasalah sebagaimana diatur pada pedoman pemberian kredit edisi Maret 2020 beserta perubahannya. Selama tahun 2025, Bank telah melakukan restrukturisasi kredit sebesar Rp3,61 triliun.

Restructured loans represent the Bank's efforts to provide credit to borrowers who are experiencing difficulties in repaying their loans. The implementation of this restructured loan policy is based on the guidelines for resolving non-performing loans as stipulated in the March 2020 edition of the credit granting guidelines and its subsequent amendments. During 2025, the Bank restructured loans totaling Rp3.61 trillion.

Kebijakan Pencegahan Insider Trading

Insider Trading Prevention Policy

Hingga 31 Desember 2025, 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 December 31, 2025, Bank Sahabat Sampoerna has not yet established a written policy to prevent insider trading due to the Bank's status as a privately held company. However, the Bank consistently ensures that all employees and officers do not disclose confidential information to employees or other parties who do not have a legitimate business need for such information.

Transaksi yang Mengandung Benturan Kepentingan

Transactions Involving Conflicts 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 consistently minimizing practices that run counter to best governance practices, including transactions involving conflicts of interest. This is intended to help the Bank avoid losses and maintain its business credibility. Bank has also implemented policies regarding the management of credit facilities extended to related parties and major customers.

Informasi terkait transaksi yang mengandung benturan kepentingan pada Bank dalam waktu 3 (tiga) tahun terakhir diungkapkan sebagai berikut:

Information regarding transactions involving conflicts of interest at the Bank over the past 3 (three) years is disclosed as follows:

Tahun	Nama dan Jabatan Pihak yang Memiliki Benturan Kepentingan *Parties with a Conflict of Interest*	Nama dan Jabatan Pengambilan Keputusan *Decision-Making*	Jenis Transaksi *Type of Transaction*	Nilai Transaksi (dalam jutaan Rupiah) *Type of Transaction*	Keterangan* *Remarks**
2025	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*
2024	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*
2023	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*	Nihil *None*

*) Tidak sesuai sistem dan prosedur yang berlaku | *Does not comply with applicable systems and procedures*

Akses Informasi

Access to Information

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:

In conducting its business, Bank Sahabat Sampoerna consistently provides access to information for all stakeholders in accordance with the principle of transparency in the Bank's governance. All stakeholders can access the required information through the 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.

The Bank provides information transparency to stakeholders, as follows

Bentuk Keterbukaan Informasi *Forms of Information Disclosure*	**2025**	**2024**	**2023**
Iklan Publikasi Pengumuman *Advertisements Publications Announcements*	2	2	-
Iklan Publikasi Laporan Keuangan Kuartal *Quarterly Financial Report Advertisement*	-	1	-
Laporan Tahunan *Annual Report*	1	15	1
Siaran Pers *Press Release*	12	1	12
Media Visit	2	1	2
Media Gathering	1	2	9

Hubungan Investor

Investor Relations

Sepanjang tahun 2025, 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.

Throughout 2025, the Bank conducted investor relations activities by visiting various media outlets and several institutions. In addition, communication took the form of periodic publication of financial reports and responses to questions raised by investors.

Aktivitas Media Relations

Media Relations Activities

Siaran Pers dan Liputan Pemberitaan

Press Releases and Media Coverage

Sepanjang tahun 2025, Bank telah mempublikasikan sebanyak 11 siaran pers dalam bentuk transparansi informasi kepada masyarakat dan 383 liputan pemberitaan mengenai Bank Sahabat Sampoerna yang dipublikasikan di beberapa media sebagai berikut:

Throughout 2025, the Bank published 11 press releases to ensure transparency of information to the public and 383 news coverage items regarding Bank Sahabat Sampoerna, which were published in the following media outlets:

1. Siaran Pers/ *Press Releases*

No	Judul *Title*	Tanggal *Date*
1	Kembali Gelar Sampoerna Fest, Bank Sampoerna Ajak Masyarakat Palembang Tingkatkan Literasi Keuangan *Bank Sampoerna Hosts Sampoerna Fest Again, Encouraging Palembang Residents to Improve Financial Literacy*	1 Februari 2025 *February 1, 2025*
2	Bank Sampoerna Perluas Jangkauan Sampoerna Fest 2025 Demi Dorong Literasi dan Inklusi Keuangan *Bank Sampoerna Expands the Reach of Sampoerna Fest 2025 to Promote Financial Literacy and Inclusion*	14 Februari 2025 *February 14, 2025*
3	Didukung Fundamental Solid, Bank Sampoerna Terus Dukung UMKM bersama Masyarakat *Supported by Solid Fundamentals, Bank Sampoerna Continues to Support MSMEs and the Community*	8 April 2025 *April 8, 2025*
4	Gelar Sampoerna Fest Samarinda, Bank Sampoerna Tingkatkan Indeks Literasi Keuangan bagi Masyarakat *Hosting Sampoerna Fest Samarinda, Bank Sampoerna Boosts Financial Literacy Among the Community*	3 Mei 2025 *May 3, 2025*
5	Kedepankan Kolaborasi dan Digitalisasi, Bank Sahabat Sampoerna Pacu Akses Pendanaan UMKM *Prioritizing Collaboration and Digitalization, Bank Sahabat Sampoerna Boosts Access to Funding for MSMEs*	15 Mei 2025 *May 15, 2025*
6	Gelar SampoernaFest Makassar, Bank Sampoerna Perkuat Literasi dan Inklusi Finansial di Timur Indonesia *Hosting SampoernaFest Makassar, Bank Sampoerna Strengthens Financial Literacy and Inclusion in Eastern Indonesia*	26 Juli 2025 *July 26, 2025*
7	Likuiditas dan Fundamental Terjaga, Bank Sampoerna Tegaskan Komitmen Berkelanjutan terhadap UMKM *With Liquidity and Fundamentals Maintained, Bank Sampoerna Affirms Its Ongoing Commitment to MSMEs*	12 Agustus 2025 *August 12, 2025*
8	Dorong Pemerataan Kredit, Bank Sampoerna Siap Serap Kebutuhan Pendanaan Mitra Fintech *Promoting Credit Equity, Bank Sampoerna Ready to Meet Fintech Partners' Funding Needs*	20 Oktober 2025 *October 20, 2025*
9	SampoernaFest Hadir Perdana di Pekanbaru, Bank Sampoerna Perkuat Komitmen Literasi Keuangan Provinsi Riau *SampoernaFest Debuts in Pekanbaru, Bank Sampoerna Strengthens Commitment to Financial Literacy in Riau Province*	25 Oktober 2025 *October 25, 2025*
10	Bank Sampoerna Pertahankan Porsi Penyaluran Kredit Mayoritas ke UMKM *Bank Sampoerna Maintains Majority of Loans Disbursed to MSMEs*	10 November 2025 *November 10, 2025*
11	Bantu Masyarakat Temukan Solusi Pembiayaan Lebih Cepat, Bank Sampoerna Optimalkan Layanan PDaja.com *Helping the Public Find Financing Solutions Faster, Bank Sampoerna Optimizes PDaja.com Services*	26 November 2025 *November 26, 2025*

2. Liputan Pemberitaan / *News Coverage*

Topik *Topics*	Jumlah *Total*
Sampoerna Fest Palembang	19
Sampoerna Fest Samarinda	25
Sampoerna Fest Makassar	32
Sampoerna Fest Pekanbaru	28
Sampoerna Fest Pontianak	10
Press conference Sampoerna Fest 2025 Nasional *Sampoerna Fest 2025 National Press Conference*	43
Passing mention	66
Media visit ke IDN dengan topik pertumbuhan nasabah *Media visit to IDN on the topic of customer growth*	1
Buka Puasa bersama dan penyerahan donasi kepada YPAC *Iftar gathering and donation handover to YPAC*	5
Buka puasa bersama dengan media *Iftar with the media*	10
Kinerja tahun 2024 *2024 Performance*	19
Kinerja Q1 2025 *Q1 2025 Performance*	18
Kinerja Q2 2025 *Q2 2025 Performance*	20
Kinerja Q3 2025 *Q3 2025 Performance*	24
Penyaluran pembiayaan dari PD.aja.com *Loan Disbursements from PD.aja.com*	15

Topik *Topics*	**Jumlah** *Total*
Kolaborasi dengan fintech *Collaboration with fintech*	19
Media interview Investortrust dengan Direktur IT *Investortrust media interview with the IT Director*	1
Grebek pasar & edukasi keuangan di Pasar Induk Tanah Tinggi *Market outreach & financial education at Tanah Tinggi Central Market*	5
Kolom investasi pilihan direktur keuangan *Featured Investment Column by the CFO*	2
Tanggapan terhadap surat pembaca *Response to a letter to the editor*	1
Kunjungan kepada nasabah pelaku UMKM kerupuk kulit *Visit to a small business owner making skin crackers*	11
Tantangan kredit UMKM terhadap kinerja bank *The challenge of MSME lending on bank performance*	3
Perayaan Natal tahun 2025 dengan berbagi ke Panti Asuhan Desa Putera *2025 Christmas Celebration with a donation to the Putera Village Orphanage*	6
Jumlah Total	383

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 2025 diungkapkan sebagai berikut:

Media Gathering and Media Visit

The Bank also held media gatherings and media visits with the aim of strengthening the relationship between the Bank and the media, as well as supporting the Bank's transparency of information to all stakeholders. Information regarding the Bank's media gatherings and media visits during 2025 is disclosed as follows:

1. *Media Gathering*

Kegiatan *Event*	**Tanggal** *Date*	**Tempat** *Location*
Buka puasa bersama media *Iftar with the media*	20 Maret 2025 *March 20, 2025*	Kembang Goela, Jakarta

2. *Media Visit*

Kegiatan *Event*	**Tanggal** *Date*	**Tempat** *Location*
Kunjungan ke IDN Times *Visit to IDN Times*	14 Maret 2025 *March 14, 2025*	Kantor IDN Times, Jakarta *IDN Times Office, Jakarta*
Kunjungan ke Kantor Berita ANTARA *Visit to the ANTARA News Agency*	26 November 2025 *November 26, 2025*	Kantor ANTARA, Jakarta *ANTARA Office, Jakarta*

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 3,5%;
   c. Tingkat pertumbuhan Dana Pihak Ketiga 5,6%;
   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 Rp325,75 miliar; dan
   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;

In response to a dynamic external environment and adjustments to applicable laws and regulations, Bank Sahabat Sampoerna continuously reviews its business strategies whether short-term, medium-term, or long-term which are outlined in the Bank's Business Plan. The strategic plan is detailed as follows:

1. *Short-Term Strategic Plan*
   a. *Maintain the Risk-Based Bank Rating (RBBR) and Good Corporate Governance (GCG) at composite rating 2;*
   b. *Credit growth rate of 3.5%;*
   c. *Third-party funds growth rate of 5.6%;*
   d. *Enhancing the competence and expertise of human resources;*
   e. *Improving the implementation of risk management;*
   f. *Improving the quality of internal audits;*
   g. *Amount of core capital;*
   h. *The Non-Performing Loan (NPL) ratio is below 5%;*
   i. *The amount of repossessed assets (AYDA) is Rp325.75 billion; and*
   j. *Implementation of Customer Due Diligence (CDD) in the context of implementing APU, PPT, and PPPSPM.*
2. *Medium-Term Strategic Plan*
   a. *Maintain an RBBR 2 composite rating by continuously monitoring each component of the RBBR and enhancing risk awareness and a compliance--oriented culture among all Bank staff through training and outreach;*
   b. *The amount of core capital will continue to be increased through organic growth strategies (internal growth) as well as through capital raising plans from both current shareholders and other new investors, if any. The Controlling Shareholders remain committed to complying with capital adequacy requirements in accordance with OJK policies;*
   c. *In line with the achievement of the Core Capital amount mentioned above, and in accordance with the selected API tier, the Bank will remain a bank focused on specific business segments, namely MSMEs. Furthermore, the Bank will continue to develop an open banking ecosystem aimed at providing a wide range of digital financial products and services to meet the needs of MSMEs within the Bank's stakeholder base;*

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, serta menindaklanjuti berbagai arahan terkini regulator termasuk tindak lanjut atas arahan mengenai penanganan judi *online*;
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; dan
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. In an effort to improve a sound funding structure, in addition to continuing to increase deposit mobilization, the Bank will seek to obtain alternative sources of funding, such as the issuance of securities and other loans;
e. The Bank will continue to strengthen the implementation of AML-CTF & CPWMD measures in accordance with applicable regulatory requirements and evolving patterns of money laundering, terrorist financing, and CPWMD, as well as follow up on various recent regulatory directives, including those regarding the handling of online gambling;
f. The Bank actively participates in the agenda of the Financial Transaction Reports and Analysis Center (PPATK) and the Supervisory and Regulatory Agency (LPP), and supports the prevention and enforcement of the laws on money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction (CPWMD) performed by law enforcement agencies; and
g. The Bank will continuously monitor branch performance and adjust its branch network by adding, closing, or relocating Branches, Sub-Branches, and/or Functional Offices as needed.

3. Long-Term Strategic Plan
   a. Committed to ensuring the Bank’s long-term sustainability;
   b. Delivering value to the local community, as the Bank’s purpose is not solely to generate profit;
   c. Continuously building brand awareness and selectively expanding our branch network as a long-term investment; and
   d. The Bank consistently develops a more diversified business platform.

Pernyataan dan Pratik Bad Corporate Governance

Statements and Practices Regarding 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 conduct sound business activities in compliance with laws and regulations by seeking to avoid practices of poor corporate governance, as follows.

Uraian *Description*	**Praktik** *Practice*
Adanya laporan sebagai Bank yang mencemari lingkungan *Reports that the bank is polluting the environment*	Nihil *None*
Perkara penting yang sedang dihadapi oleh Bank, anggota Dewan Komisaris, dan/atau Direksi yang sedang menjabat tidak diungkapkan dalam Laporan Tahunan *Significant matters currently facing the Bank, members of the Board of Commissioners, and/or the current Board of Directors are not disclosed in the Annual Report*	Nihil *None*
Ketidakpatuhan dalam pemenuhan kewajiban perpajakan *Non-compliance with tax obligations*	Nihil *None*
Ketidaksesuaian penyajian Laporan Tahunan dan Laporan Keuangan dengan peraturan yang berlaku dan Standar Akuntansi Keuangan *Inconsistencies in the presentation of the Annual Report and Financial Statements with applicable regulations and Financial Accounting Standards*	Nihil *None*
Kasus terkait buruh dan karyawan *Cases related to labor and employees*	Nihil *None*
Terdapat ketidaksesuaian antara Laporan Tahunan *hardcopy* dengan Laporan Tahunan *softcopy* *There is a discrepancy between the hardcopy Annual Report and the softcopy Annual Report*	Nihil *None*

Transparansi Kondisi Keuangan dan Non-Keuangan Bank yang Belum Diungkap dalam Laporan Lain

Transparency of the Bank's Financial and Non-Financial Conditions Not Disclosed in Other Reports

Sepanjang tahun 2025, Bank telah menyampaikan transparansi terhadap Laporan Tahunan (keuangan dan non keuangan) serta Laporan Keuangan Publikasi Triwulanan dan Laporan Keuangan Publikasi Bulanan dengan tepat waktu dan disampaikan di situs web Bank.

Throughout 2025, the Bank has ensured transparency regarding its Annual Reports (financial and non-financial), Quarterly Financial Reports, and Monthly Financial Reports, which have been published on time and made available on the Bank's website.

Informasi Lain terkait Tata Kelola Bank

Other Information Related to Bank 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 2025, Bank telah melaksanakan aktivitas bisnis dengan baik dan bertanggung jawab merujuk pada prinsip-prinsip Tata Kelola Perusahaan (GCG), Kode Etik, Sampoerna Way, serta peraturan perundang-undangan yang berlaku.

The Bank remains committed to conducting its business activities properly without interference from owners or other parties, and to avoiding internal disputes or other issues, particularly those arising from pay gaps. By 2025, the Bank have conducted its business activities effectively and responsibly in accordance with the principles of Good Corporate Governance (GCG), the Code of Conduct, the Sampoerna Way, and applicable laws and regulations.