PT Bank Victoria International Tbk

bank victoria

Laporan Tahunan dan Keberlanjutan
Annual and Sustainability Report
2023



MOVING FORWARD TO ACCELERATED GROWTH AND STRONGER GOVERNANCE

SANGGAHAN DAN BATASAN TANGGUNG JAWAB

Disclaimer and Scope of Responsibilities

Laporan Tahunan 2023 PT Bank Victoria International Tbk (yang selanjutnya disebut Bank Victoria atau Bank) ini disusun untuk memenuhi ketentuan pelaporan hasil kinerja Bank pada periode 1 Januari 2023 sampai dengan 31 Desember 2023 kepada regulator dan pemangku kepentingan. Laporan Tahunan ini antara lain disusun berdasarkan Peraturan Otoritas Jasa Keuangan No. 29/POJK.04/2016 tentang Laporan Tahunan Emiten atau Perusahaan Publik dengan muatan konten sesuai Surat Edaran Otoritas Jasa Keuangan No. 16/SEOJK.04/2021 tentang Bentuk dan Isi Laporan Tahunan Emiten atau Perusahaan Publik.

Laporan Tahunan ini memuat pernyataan terkait tujuan, kebijakan, rencana, strategi, serta hasil operasi dan keuangan yang disusun berdasarkan data faktual yang dapat dipertanggungjawabkan kebenarannya. Selain itu, Laporan Tahunan ini juga menyajikan informasi terkait proyeksi kerja Bank di tahun selanjutnya yang disusun berdasarkan pernyataan-pernyataan prospektif dan berbagai asumsi mengenai kondisi mendatang Bank, serta lingkungan bisnis yang terkait, sehingga dapat mengakibatkan perkembangan aktual secara material berbeda dari yang dilaporkan. Oleh karena itu, Bank mengimbau agar pemangku kepentingan dapat menggunakan informasi tersebut secara bijak dalam pengambilan keputusan.

The 2023 Annual Report of PT Bank Victoria International Tbk (hereinafter referred to as Bank Victoria or Bank) was prepared to meet the requirements of reporting the Bank performance results for the period of 1 January 2023 to 31 December 2023 to the regulator and stakeholders. This Annual Report was compiled based on Financial Services Authority Regulation No. 29/POJK.04/2016 on Annual Reports of Issuers or Public Companies with contents in accordance with Financial Services Authority Circular No. 16/SEOJK.04/2021 on the Form and Content of Annual Reports of Issuers or Public Companies.

This Annual Report contains statements related to objectives, policies, plans, strategies, and results of operations and finance compiled based on factual data that is justifiable. In addition, this Annual Report also presents information related to the Bank work projections for the following year compiled based on prospective statements and various assumptions regarding the Bank's future conditions, as well as the related business environment, which may result in actual developments that are materially different from those reported. Therefore, the Bank urges stakeholders to use the information with discretion in their decision making.

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MOVING FORWARD TO ACCELERATED GROWTH AND STRONGER GOVERNANCE



PT Bank Victoria International Tbk menyambut baik setiap potensi pertumbuhan ekonomi dan stabilitas sistem keuangan dengan optimis, namun tetap realistis dan reliabel. Hal ini terlihat dari strategi dan kebijakan yang ditempuh Bank yang menekankan pada akselerasi pertumbuhan bisnis yang *prudent* dan berkelanjutan melalui inovasi produk dan layanan berbasis digital yang disertai dengan penguatan implementasi tata kelola perusahaan yang baik dan berkelanjutan, termasuk manajemen risiko yang komprehensif. Melalui penerapan strategi secara ketat namun adaptif, serta bertahap namun terarah, Bank akan mampu meraih pertumbuhan yang sehat dan berkelanjutan.

2023

Laporan Tahunan dan Keberlanjutan
Annual and Sustainability Report

PT Bank Victoria International Tbk welcomes any potential for economic growth and financial system stability with optimism, but remains realistic and reliable. This can be seen from the strategies and policies adopted by the Bank, which emphasize accelerating prudent and sustainable business growth through digital-based product and service innovation, accompanied by strengthening the implementation of good and sustainable corporate governance, including comprehensive risk management. By implementing strict-but-adaptive, gradual-but-directed strategies, the Bank will be able to achieve sound and sustainable growth.



2022

INNOVATION AND GOVERNANCE FOR HIGHER LEVEL OF CONVENIENCE BANKING

PT Bank Victoria International Tbk terus menjalankan rencana bisnis yang *prudent* dengan mempertimbangkan skala usaha, tingkat kesehatan keuangan, serta arah pertumbuhan ke depan. Sebagai bentuk perwujudannya, di tahun 2022, Bank melakukan pengembangan secara berkelanjutan terhadap *internet banking* dan *mobile banking* untuk memberikan produk dan layanan yang kompetitif. Diversifikasi pada portfolio kredit juga dilakukan dengan disertai upaya membangun kredit *channeling* dan ekosistem digital *lending* sebagai salah satu pilar utama pertumbuhan operasional dan keuangan yang berkelanjutan. Inovasi yang sejalan dengan penyempurnaan sistem tata kelola yang sedang berjalan ini diyakini akan membawa Bank naik pada posisi yang lebih tinggi di industri perbankan nasional.

PT Bank Victoria International Tbk keeps executing a sensible business strategy while taking into account the size of the company, its level of financial stability, and its projected growth paths. In order to provide customers with competitive goods and services, the Bank continue to improve its internet banking and mobile banking in 2022. The diversification of the credit portfolio has also undertaken along with efforts to create credit channeling and digital lending ecosystems as one of the key foundations of sustainable operational and financial growth. The Bank is expected to leveling up in the national banking sector as a result of this innovation, which is in line with the continual improvement of the governance system.



2021

INNOVATION AND GOVERNANCE FOR HIGHER LEVEL OF CONVENIENCE BANKING

Dalam menghadapi dinamika bisnis dan ketidakpastian ekonomi yang masih berlanjut di tahun 2021, PT Bank Victoria International Tbk mempercepat perubahan dalam memberikan layanan serta menghadirkan produk dan aktivitas baru yang sesuai dengan kebutuhan nasabah. Bank dengan cepat beradaptasi terhadap pola bisnis digital dengan membudayakan *Safe* (keamanan), *Quick* (kecepatan), *Easy* (kemudahan), *and Warm* (kenyamanan dan kedekatan) pada sisi layanan, produk, proses, cara kerja, nuansa, dan lainnya. Transformasi struktural dan fundamental ini disertai dengan upaya mencari sumber pertumbuhan yang sehat dan cepat melalui pengembangan porsi simpanan deposan retail serta peningkatan kualitas kredit pada segmen UKM dan komersial yang dipandang memiliki prospek pertumbuhan yang baik. Strategi ini ditunjang dengan optimalisasi pemanfaatan fitur *Internet Banking and Mobile Banking* (IBMB) serta *Internet Banking Business* (ViBiz) yang telah dimiliki Bank. Seluruh kebijakan dan strategi tersebut diimplementasikan dengan prinsip kehati-hatian serta mempertimbangkan arah pertumbuhan usaha yang berkelanjutan, penerapan tata kelola perusahaan yang baik, serta penciptaan nilai bagi seluruh pemangku kepentingan.

In facing the ongoing business dynamics and economic uncertainty in 2021, PT Bank Victoria International Tbk accelerated its changes in providing services and presenting new products and activities that suit customer needs. The Bank quickly adapts to the digital business patterns by cultivating Safe (security), Quick (speed), Easy (convenience), and Warm (comfort and proximity) in terms of services, products, processes, working methods, nuances, and others. This structural and fundamental transformation is supported by efforts to find sources of sound and fast growth through developing retail depositors' portion and improving loan quality in SME and commercial segments which are deemed as having good growth prospects. These strategies are supported by optimizing the utilization of the Bank's Internet Banking and Mobile Banking (IBMB) and Internet Banking Business (ViBiz) features. All of these policies and strategies are implemented with prudence principles and with due observance to the direction of sustainable business growth, implementation of good corporate governance, and value creation for all stakeholders.

Keunggulan Kompetitif
Competitive Advantages

Memiliki Jaringan Kantor Operasional yang Berfokus pada Penetrasi Pasar

Having Operational Office Network that Focuses on Market Penetration





Menerapkan *Good Personal Customer Relation Approach* (*Relationship Banking*)

Implementing the Good Personal Customer Relation Approach (Relationship Banking)

Inovasi Produk dan Layanan

Product and Service Innovations





Memiliki Tingkat Kecukupan Modal yang Kuat

Having Strong Capital Adequacy

Memiliki Potensi Sinergi dan Saling Menguntungkan dengan Seluruh Grup Usaha

Potential Synergy and Mutual Benefits with All Business Groups

Manajemen yang Kuat, Berpengalaman dan Berdedikasi dengan Visi dan Misi Baru, serta Memiliki Komitmen Tinggi pada Peningkatan Penerapan GCG

Strong, Experienced, and Dedicated Management with New Vision and Mission, as well as High Commitment on Improving GCG implementation

Komitmen dan Strategi Keberlanjutan
Sustainability Commitment and Strategy

Sebagai lembaga keuangan, Bank Victoria menyadari pentingnya isu penerapan keuangan berkelanjutan dengan mengedepankan prinsip *triple bottom line* dalam kegiatan usaha Bank, yakni *people, profit* dan *planet*. Di mana aspek ekonomi, sosial dan lingkungan hidup merupakan 3 (tiga) hal yang seharusnya berjalan selaras dengan tetap menjalankan tata kelola yang baik. Atas dasar tersebut, Bank Victoria terus berkomitmen untuk menjadi lembaga keuangan yang memberikan pertumbuhan ekonomi dan bisnis yang berkesinambungan bagi seluruh lapisan masyarakat melalui layanan inklusi, memberi dampak positif kepada masyarakat dengan meningkatkan literasi keuangan, memberikan pembiayaan yang bertanggung jawab terhadap lingkungan, menciptakan kondisi kerja terbaik bagi karyawan, serta menerapkan etika bisnis yang baik dengan mematuhi peraturan dan perundang-undangan yang berlaku.

Seluruh tujuan dari penerapan keuangan berkelanjutan Bank pada hakikatnya selaras dengan berbagai rumusan tujuan yang terdapat dalam Tujuan Pembangunan Berkelanjutan (SDGs). Oleh karena itu, sebagai wujud nyata komitmen Bank terhadap pembangunan berkelanjutan dan penerapan prinsip keuangan berkelanjutan, Bank Victoria telah menyusun program atau rencana kerja jangka panjang yang termuat dalam Rencana Aksi Keuangan Berkelanjutan (RAKB).

RAKB menjadi pedoman dalam penerapan keuangan berkelanjutan di Bank Victoria agar berjalan secara terarah dan terukur, sesuai dengan target yang telah direncanakan. Pelaksanaan pada tahun 2023 dilakukan sesuai RAKB Tahun 2023-2027 yang disampaikan kepada Otoritas Jasa Keuangan pada tanggal 30 November 2022.

As a financial institution, Bank Victoria realizes the importance of issue of implementing sustainable finance by prioritizing the triple bottom line principles in the Bank's business activities. The principles are people, profit, and planet, in which economic, social, and environmental aspects are 3 (three) matters that should work in harmony while maintaining a good governance. On such basis, Bank Victoria is constantly committed to becoming a financial institution that provides sustainable economic and business growth for all society levels through inclusive services, providing a positive impact on society by increasing financial literacy, providing environmentally responsible financing, establishing best working conditions for employees, as well as implementing good business ethics by complying with the applicable laws and regulations.

All objectives of the Bank's implementation of sustainable finance are essentially in line with various goal formulations set out in the Sustainable Development Goals (SDGs). Therefore, as a concrete manifestation of the Bank's commitment to sustainable development and implementation of sustainable finance principles, Bank Victoria has prepared a long-term program or work plan which is set out in the Sustainable Finance Action Plan (RAKB).

RAKB is a guideline for implementing sustainable finance at Bank Victoria so that it runs in a directed and measurable manner, according to the planned targets. The implementation in 2023 was carried out in accordance with the 2023-2027 RAKB which was submitted to the Financial Services Authority on 30 November 2022.

Prioritas Penerapan Keuangan Berkelanjutan

RAKB yang telah disusun mengandung beberapa prioritas utama dalam penerapan keuangan berkelanjutan, sebagaimana diuraikan berikut:

1. **Pengembangan Kapasitas Internal Bank**
   Untuk meningkatkan kualitas penerapan prinsip keuangan berkelanjutan yang dilakukan, maka kami senantiasa berupaya untuk meningkatkan pemahaman seluruh karyawan melalui berbagai kegiatan pengembangan kompetensi yang diselenggarakan, baik oleh pihak internal maupun eksternal Bank. Secara bertahap, seluruh karyawan telah mendapatkan pengembangan kompetensi dan memahami perihal keuangan berkelanjutan yang sesuai dengan kompleksitas usaha Bank pada tahun 2024.

Priority of Sustainable Finance Implementation

The RAKB that has been prepared consists of the main priorities in applying sustainable finance, as described below:

1. **Bank's Internal Capacity Development**
   To improve the implementation quality of the sustainable finance principles, we strive to increase personnel's understanding through various competency development activities organized by both internal and external parties of the Bank. Gradually, all employees have attended competence development programs and understood sustainable finance issues in accordance with the Bank's business complexity in 2024.

Selain kegiatan pengembangan kompetensi terkait keuangan berkelanjutan di internal Bank, kami juga melakukan penyesuaian tugas dan tanggung jawab karyawan yang telah dilaksanakan secara keseluruhan sejak tahun 2021.

2. **Penyesuaian Peraturan Internal Bank**
   Bank akan melakukan penyesuaian peraturan internal mencakup kebijakan serta prosedur terkait praktik operasional perbankan yang ramah lingkungan dan sesuai dengan prinsip keuangan berkelanjutan. Adapun pelaksanaannya akan dilakukan sejak tahun 2023 dengan tahapan sebagai berikut:

In addition to competence development activities related to sustainable finance within the Bank, we have also adjusted employees' duties and responsibilities which have been fully carried out since 2021.

2. **Adjustment to the Bank's Internal Regulations**
   The Bank will adjust internal regulations including policies and procedures related to environmentally- friendly banking operational practices, in line with the sustainable finance principles. The implementation began in 2023 with the following stages.

2023	*Mapping & Review*
2024	Menyempurnakan Kebijakan Manajemen Risiko Keuangan Berkelanjutan dengan Memasukkan Aspek Risiko Lingkungan Hidup dan Sosial Refining the Sustainable Finance Risk Management Policy by Incorporating Environmental and Social Risk Aspects
2025	*Mapping & Review*
2026	Mengintegrasikan Aspek Lingkungan Hidup dan Sosial dalam Kebijakan Tata Kelola Perusahaan Integrating Environmental and Social Aspects in the Corporate Governance Policy

3. **Pengembangan Bisnis yang Mendukung Keuangan Berkelanjutan**
   Dalam rangka mendukung penerapan keuangan berkelanjutan, Bank berkomitmen untuk mendanai proyek bisnis yang ramah lingkungan sebanyak 11% dari kredit yang diberikan untuk sektor industri pengolahan.

3. **Business Development that Supports Sustainable Finance**
   To support the implementation of sustainable finance, the Bank is committed to funding environmentally friendly business projects by 11% of the credit provided to the processing industry sector.

4. **Kegiatan Pendukung Keuangan Berkelanjutan**
   Bank melakukan berbagai kegiatan pendukung dalam upaya penerapan keuangan berkelanjutan seperti efisiensi kegiatan operasional sehari-hari serta kegiatan tanggung jawab sosial perusahaan (CSR) yang sejalan dengan prinsip keuangan berkelanjutan Bank Victoria.

4. **Sustainable Finance Support Activities**
   The Bank carries out various supporting activities in implementing sustainable finance such as efficiency of daily operational activities and corporate social responsibility (CSR) activities aligned with Bank Victoria's sustainable finance principles.

RAKB Bank Victoria Tahun 2023-2027

Bank Victoria telah menyusun aksi keberlanjutan yang akan dilaksanakan berdasarkan prioritas keuangan berkelanjutan yang dimiliki. Periode pelaksanaannya dimulai sejak tahun 2023 hingga tahun 2027 dengan berbagai program yang ditunjukkan sebagai berikut:

Bank Victoria's RAKB 2023-2027

Bank Victoria has formulated sustainable actions to be implemented based on sustainable finance priorities. The implementation period starts from 2023 to 2027 with various programs as shown below:

Program Pertama: Pengembangan Kapasitas Internal Bank

Pencapaian target RAKB perlu didukung oleh pemahaman setiap pihak, baik karyawan maupun debitur terkait prinsip-prinsip keuangan berkelanjutan yang diterapkan Bank. Selanjutnya, dilakukan penyesuaian tugas bagi karyawan yang bertanggung jawab terhadap penerapan keuangan berkelanjutan di lingkungan kerja Bank Victoria.

First Program: Bank's Internal Capacity Development

RAKB target achievement needs to be supported by each party's understanding, employees and debtors, regarding the sustainable finance principles applied by the Bank. Furthermore, adjustments were made to duties of employees responsible for implementing sustainable finance within Bank Victoria.

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2023	2024	2025	2026	2027		
Training of trainers.	Menjadi bagian dari *Training* Perihal Keuangan Berkelanjutan. Becoming part of the Sustainable Finance Training.							
Pelatihan terkait penerapan prinsip keuangan berkelanjutan untuk pihak internal. Training related to the application of sustainable finance principles for internal parties.	• Pengurangan penggunaan botol minum plastik; • Penghematan energi; dan • Pelaksanaan pelatihan keuangan berkelanjutan. • Reduction in the usage of plastic drinking bottles; • Energy savings; and • The organization of training in sustainable finance.	**100%**	100%	100%	80%	100%	*Human Capital Management & General Affair*	
Pelatihan untuk pihak eksternal yang bekerja sama dengan Divisi Bisnis. Training for external parties cooperating with the Business Division.	Pembinaan bagi debitur atau calon debitur terkait keuangan berkelanjutan. Development activities for debtors or potential debtors related to sustainable finance.	**80%**	100%	100%	100%	100%	*Human Capital Management* & Divisi Bisnis / Business Division	
Penyesuaian uraian tugas terkait keuangan berkelanjutan. Adjustments to the description of duties related to sustainable finance.	Penyusunan *key performance indicator* (KPI) serta uraian tugas dan tanggung jawab yang jelas. Preparing key performance indicators (KPIs) and clear description of duties and responsibilities.	**100%**	100%	100%	100%	100%	*Human Capital Management*	-
Tantangan Challenges	**Program ini yakni melibatkan berbagai pihak sehingga sulit untuk mengatur waktu pelatihan dari setiap Divisi.** **This program involves various parties, making it difficult to arrange training times for each Division.**							
Strategi/Rencana ke Depan Future Strategies/Plans	**Mengadakan pelatihan dalam beberapa *batch* sehingga memungkinkan para pemangku kepentingan dapat mengikuti kegiatan pelatihan.** **Hold training in several batches to enable stakeholders to participate in training activities.**							

Program Kedua: Penyesuaian Peraturan Internal Bank

Peraturan internal Bank yang sesuai dengan prinsip-prinsip keuangan berkelanjutan merupakan hal yang penting dalam mencapai tujuan penerapan keuangan berkelanjutan di Bank Victoria.

Second Program: Adjustment To The Bank's Internal Regulations

Bank's internal regulations that comply with sustainable finance principles are important in achieving the goal of implementing sustainable finance at Bank Victoria.

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2023	2024	2025	2026	2027		
Penyesuaian kebijakan dan/atau SOP yang terkait keuangan berkelanjutan. Adjustments to policies and/or SOP related to sustainable finance.	Penyesuaian kebijakan dan/atau SOP yang terkait dengan keuangan berkelanjutan dengan rencana kerja 5 tahunan Bank. Adjustments to policies and/or SOP concerning sustainable finance to the Bank's 5-year work plan.	87%	100%	100%	100%	100%	*Compliance & System Procedure* dan Unit Terkait / and Related Unit	-
Tantangan Challenges	**Keterbatasan waktu yang tersedia untuk menyesuaikan peraturan internal dengan prinsip-prinsip keuangan berkelanjutan.** **Limited time available to adjust the internal regulations to sustainable finance principles.**							
Strategi/Rencana ke Depan Future Strategies/Plans	**Menetapkan *timeline* program serta melibatkan para pemangku kepentingan dalam proses penentuan dan penyesuaian peraturan internal.** **Determining the program timeline and involving stakeholders in the process of determining and adjusting internal regulations.**							

Program Ketiga: Pengembangan Bisnis yang Mendukung Keuangan Berkelanjutan

Bank berkomitmen untuk mendorong pertumbuhan ekonomi melalui pembiayaan usaha yang tergolong kegiatan usaha berkelanjutan.

Third Program: Business Development That Supports Sustainable Finance

The Bank is committed to encouraging economic growth through financing business classified as a sustainable business activity.

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2023	2024	2025	2026	2027		
Pembiayaan pada industri manufaktur. Financing for manufacturing industry.	Dilakukan Perubahan Uraian Kegiatan. Changes to the Description of Activity.							
Pembiayaan terhadap Usaha yang mendukung keuangan berkelanjutan. Financing for Businesses that support sustainable finance.	Pembiayaan kepada debitur yang memenuhi kriteria kegiatan usaha berkelanjutan sesuai dengan SDGs. Financing to debtors who meet the criteria for sustainable business activities in accordance with the SDGs.	**+ 50 Miliar Billion**	+ 50 Miliar Billion	+ 75 Miliar Billion	+ 75 Miliar Billion	+ 75 Miliar Billion	SME, *Commercial Banking*, *Multifinance and Commercial Banking*, dan / and *Corporate Banking*.	

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2023	2024	2025	2026	2027		
Tantangan Challenges	**Terbatasnya waktu untuk melakukan pengembangan bisnis melalui penyediaan layanan perbankan kepada debitur yang berwawasan lingkungan.** Limited time to carry out business development through the provision of banking services to the environmentally sound debtors.							
Strategi/Rencana ke Depan Future Strategies/Plans	**Melakukan upaya pemetaan pembiayaan yang didukung kebijakan terkait keuangan berkelanjutan.** Carry out financing mapping efforts that are supported by policies related to sustainable finance.							

Program Keempat: Kegiatan Pendukung Keuangan Berkelanjutan

Bank melakukan berbagai kegiatan pendukung untuk memaksimalkan manfaat dari penerapan prinsip-prinsip keuangan berkelanjutan yang dilakukan.

Fourth Program: Sustainable Finance Support Activities

The Bank carries out various supporting activities to optimally manage the benefits of implementing sustainable finance principles.

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2023	2024	2025	2026	2027		
Program CSR. CSR Program.	CSR berkelanjutan di bidang kesehatan, pendidikan, dan sosial kemasyarakatan. Sustainable CSR in health, education, and social community.	**10%**	12%	15%	15%	15%	*Human Capital Management & General Affair*	
Kebijakan penghematan kertas. Policies for paper saving.	Penghematan kertas dengan penggunaan surat elektronik. Paper saving by using electronic mails.	**16%**	20%	22%	22%	22%	*General Affair*	
Tantangan Challenges	**Terbatasnya aktivitas pelaksanaan program CSR akibat adanya Pandemi Covid-19, sehingga mempersulit pengukuran dampak kegiatan bagi masyarakat.** Limited CSR program implementation activities due to the Covid-19 pandemic, making it difficult to measure the impact of activities on society.							
Strategi/Rencana ke Depan Future Strategies/Plans	**Melakukan pengukuran melalui survei lapangan atau memanfaatkan data yang dikeluarkan instansi lain yang terkait.** Measure by conducting field surveys or utilizing data issued by other relevant agencies.							

Penentuan Isi dan Topik Material Laporan Keberlanjutan

Determining Contents and Material Topics of The Sustainability Report

Pelibatan Pemangku Kepentingan

Pemangku kepentingan memiliki peranan yang penting dalam penerapan keberlanjutan di lingkungan Bank Victoria. Oleh karena itu, dalam setiap pengambilan keputusan, Bank senantiasa memperhatikan kepentingan dan aspirasi para pemangku kepentingan. Bank telah mengidentifikasi dan menentukan pihak-pihak yang termasuk dalam kelompok pemangku kepentingan beserta dengan respons Bank dalam memenuhi kebutuhan masing-masing kelompok pemangku kepentingan tersebut, sebagaimana diuraikan berikut:

Stakeholders Engagement

Stakeholders play an important role in implementing sustainability within Bank Victoria. Therefore, in every decision making, the Bank always pays attention to the interests and aspirations of stakeholders. The Bank has identified and determined the parties included in the stakeholder groups along with the Bank's response in meeting the needs of each stakeholder group, as described below:

Kelompok Pemangku Kepentingan Stakeholders Group	Kebutuhan Pemangku Kepentingan Stakeholders Needs	Respons terhadap Kebutuhan Pemangku Kepentingan Respond to Stakeholders Needs	Metode Pelibatan Engagement Methods	Frekuensi Pelaksanaan Implementation Frequency
Nasabah Customers	• Kualitas produk dan jasa perbankan; • Keamanan transaksi perbankan mencakup dana dan informasi nasabah; • Informasi yang jelas dan transparan; serta • *Reward* bagi nasabah. • Quality of banking products and services; • Security of banking transactions including the customer's funds and information; • Clear and transparent information; and • Reward for customers.	• Mengembangkan produk dan jasa Bank; • Meningkatkan keandalan teknologi informasi yang digunakan; • Memastikan keamanan produk dan jasa yang diberikan; serta • Mengadakan program undian berhadiah. • Developing the Bank's products and services; • Improving the reliability of the information technology used; • Ensuring the safety the products and services provided; and • Organizing a lucky.	• Pelaksanaan *customer gathering;* • Pelaksanaan survei kepuasan nasabah; serta • Penyediaan sarana pengaduan bagi nasabah. • Organizing customer gathering event; • Conducting customer satisfaction survey; and • Providing complaint channel for customers.	Sepanjang tahun atau sesuai kebutuhan. All year round or as needed.

Kelompok Pemangku Kepentingan Stakeholders Group	Kebutuhan Pemangku Kepentingan Stakeholders Needs	Respons terhadap Kebutuhan Pemangku Kepentingan Respond to Stakeholders Needs	Metode Pelibatan Engagement Methods	Frekuensi Pelaksanaan Implementation Frequency
Karyawan Employee	• Pemenuhan hak ketenagakerjaan; • Pemenuhan aspek kesehatan dan keselamatan kerja (K3); • Pengembangan kompetensi dan karier; serta • Kepuasan kerja. • Fulfillment of employees' rights; • Fulfillment of occupational health and safety (OHS) aspect; • Competency and career development; and • Job satisfaction.	• Memenuhi kontrak kerja dan perjanjian kerja bersama; • Memastikan kecukupan sarana dan prasarana K3, termasuk upaya pencegahan penyebaran virus Covid-19 di lingkungan kerja; • Melaksanakan pengembangan kompetensi, penilaian kinerja, dan pengembangan karier; • Menyampaikan kebijakan terbaru Bank kepada seluruh karyawan; serta • Menyelenggarakan program beasiswa bagi anak karyawan. • Fulfilling work contracts and collective labor agreements; • Ensuring the adequacy of OHS facilities and infrastructures, including the measures to prevent Covid-19 outbreak in the work environment; • Conducting competency development, performance assessment, and career development; • Delivering the latest Bank policies to all employees; and • Providing scholarships for employees' children.	• Penyelenggaraan *gathering* karyawan dan *focus group discussion* (FGD); • Penyediaan *whistleblowing system* (WBS) untuk melaporkan pelanggaran praktik ketenagakerjaan di lingkungan Bank; • Pelaksanaan berbagai kegiatan pendidikan dan pelatihan, serta promosi atau mutasi; serta • Pelaksanaan survei kepuasan karyawan. • Organizing employee gathering and focus group discussion (FGD); • Provision of a whistleblowing system (WBS) to report violations of labor practice within the Bank; • Implementation of various educational and training activities, as well as promotions or transfers; and • Implementation of employee satisfaction survey.	Sepanjang tahun atau sesuai rencana pelaksanaan program. All year round or according to the program implementation plan.
Pemerintah dan Regulator Government and Regulator	• Kepatuhan terhadap peraturan yang berlaku; serta • Pemenuhan kewajiban perpajakan. • Compliance with the applicable regulations; and • Fulfillment of taxation obligations.	• Memastikan pemenuhan seluruh peraturan yang berlaku bagi Bank; • Meningkatkan kualitas pelaksanaan tata kelola perusahaan (GCG); serta • Membayar pajak dan penerimaan negara bukan pajak (PNBP). • Ensuring compliance with all regulations applicable to the Bank; • Improving the quality of corporate governance (GCG) implementation; and • Paying taxes and non-tax state revenue (PNBP).	• Penyampaian Laporan Tahunan, Laporan Keberlanjutan, Laporan GCG, dan laporan lainnya; serta • Pembayaran dan pelaporan pajak dan PNBP. • Submission of Annual Report, Sustainability Report, GCG Report, and other reports; and • Payment and reporting of taxes and PNBP.	Sesuai waktu yang ditentukan, sesuai kebutuhan, atau setiap tahun. According to the time set, needs, or annually.
Pemegang Saham dan Investor Shareholders and Investors	• Kinerja keuangan dan non-keuangan; • Keberlanjutan usaha; serta • Informasi yang jelas dan terkini terkait arah strategis Bank. • Financial and non- financial performance; • Business sustainability; and • Clear and updated information related to the Bank's strategic direction.	• Menyusun Rencana Bisnis Bank (RBB) dan RAKB; • Menjaga kinerja Bank tetap optimal dan sesuai target, dengan memperhatikan aspek ekonomi, sosial, dan lingkungan; serta • Menyampaikan informasi mutakhir secara transparan. • Preparing the Bank's Business Plan (RBB) and RAKB; • Maintaining the Bank's performance to keep optimal and on target, by considering the economic, social, and environmental aspects; and • Delivering the latest information transparently.	• Pelaksanaan Rapat Umum Pemegang Saham (RUPS); • Penyampaian Laporan Tahunan dan Laporan Keberlanjutan; serta • Akses informasi dalam situs web Bank. • Convention of the General Meeting of Shareholders (GMS); • Submission of Annual Report and Sustainability Report; and • Access to information on the Bank's website.	Sesuai waktu yang ditentukan, sesuai kebutuhan, atau setiap tahun. According to the time set, needs, or annually.

Kelompok Pemangku Kepentingan Stakeholders Group	Kebutuhan Pemangku Kepentingan Stakeholders Needs	Respons terhadap Kebutuhan Pemangku Kepentingan Respond to Stakeholders Needs	Metode Pelibatan Engagement Methods	Frekuensi Pelaksanaan Implementation Frequency
Mitra Usaha Business Partners	• Pemenuhan kontrak kerja; serta • Kepuasan kerja sama. • Fulfillment of work contracts; and • Cooperation satisfaction.	• Melakukan kerja sama yang adil dan transparan sesuai dengan peraturan dan kontrak kerja yang berlaku; serta • Membangun hubungan kerja yang harmonis dengan mitra usaha. • Conducting fair and transparent cooperation in accordance with the applicable regulations and work contracts; and • Building harmonious working relationship with business partners.	• Perumusan kontrak kerja sama; serta • Pelaksanaan pertemuan berkala. • Formulation of cooperation contract; and • Organizing regular meetings.	Sepanjang tahun atau sesuai kebutuhan. All year round or as needed.
Masyarakat Community	• Informasi aktivitas dan perkembangan usaha Bank; serta • Peningkatan kesejahteraan masyarakat. • Information on the Bank's business activities and development; and • Improvement of public health.	• Melibatkan masyarakat dalam program kemitraan dan aksi sosial Bank; • Memberikan kesempatan kerja; serta • Menyampaikan informasi mutakhir dalam media sosial Bank. • Engaging the community in partnership program and the Bank's social acts; • Providing job opportunities; and • Delivering latest information on the Bank's social media.	• Pelaksanaan berbagai program pengembangan masyarakat dan kemitraan; • Penyediaan sarana pengaduan bagi masyarakat; dan • Penyediaan akses informasi dalam media sosial Bank. • Conducting various community and partnership development programs; • Providing complaint channel for communities; and • Providing access to information on the Bank's social media.	Sesuai rencana pelaksanaan atau sesuai kebutuhan. According to the implementation plan or as necessary.
Media	• Kinerja keuangan dan non-keuangan Bank; serta • Informasi terkait perkembangan Bank. • The Bank's financial and non-financial performance; and • Information related to the Bank's development.	Menyediakan informasi secara transparan dan relevan melalui media sosial Bank. Providing information transparently and relevantly through the Bank's social media.	• Pelaksanaan paparan publik dan media *gathering*; serta • Pemutakhiran informasi pada media sosial Bank. • Conducting public expose and organizing media gathering; and • Updating information on the Bank's social media.	Sesuai kebutuhan. As necessary.

Daftar Isi
Table of Contents

Sanggahan dan Batasan Tanggung Jawab / Disclaimer and Scope of Responsibilities ii

Keunggulan Kompetitif / Competitive Advantages 3

Komitmen dan Strategi Keberlanjutan / Sustainability Commitment and Strategy 4

Penentuan Isi dan Topik Material Laporan Keberlanjutan / Determining Contents and Material Topics of The Sustainability Report 9

Daftar Isi / Table of Contents 12

Kilas Kinerja
Performance Highlights

Ilkhtisar Kinerja Keberlanjutan / Sustainability Performance Highlights 16

Ikhtisar Saham / Share Highlights 20

Ikhtisar Obligasi / Bonds Highlights 22

Peristiwa Penting / Significant Events 23

Penghargaan dan Sertifikasi / Awards and Certifications 28

Laporan Manajemen
Management Report

Laporan Dewan Komisaris / Report of the Board of Commissioners 32

Laporan Direksi / Report of the Board of Directors 40

Tanggung Jawab Laporan Tahunan dan Keberlanjutan / Annual and Sustainability Report Responsibility 51

Profil Perusahaan
Company Profile

Identitas Perusahaan / Company Identity 54

Perubahan Organisasi yang Bersifat Signifikan / Significant Organizational Changes 55

Riwayat Singkat / Brief History 56

Visi dan Misi Perusahaan / Company's Vision and Mission 58

Nilai Budaya Perusahaan / Corporate Cultural Values 60

Kegiatan Usaha / Line of Business 61

Produk dan Jasa / Products and Services 62

Wilayah Operasional / Operational Areas 64

Alamat Kantor Pusat, Kantor Cabang Utama, dan Kantor Cabang Pembantu Bank Victoria / Address of Head Office, Main Branch Offices, and Sub-Branch Offices of Bank Victoria 66

Struktur Organisasi / Organization Structure 68

Daftar Keanggotaan dalam Asosiasi / List of Association Membership 70

Profil Dewan Komisaris / Board of Commissioners Profile 71

Profil Direksi / Board of Directors Profile 74

Profil Pejabat Eksekutif / Executive Officer Profile 80

Profil Kepala Kantor Cabang Utama / Profile of Main Branch Office Head 87

Komposisi Pemegang Saham / Shareholders Composition 88

Komposisi Pemegang Saham yang Memiliki 5% atau Lebih Saham / Composition of Shareholders with 5% or More Shares 89

Kepemilikan Saham Langsung dan Tidak Langsung atas Saham Bank Victoria oleh Anggota Dewan Komisaris dan Direksi / Direct and Indirect Share Ownership of Bank Victoria's Shares by Members of Board of Commissioners and Board of Directors 89

Komposisi Pemegang Saham Masyarakat dengan Kepemilikan Saham Masing-Masing Kurang dari 5% / Composition of Public Shareholders with Share Ownership of Less than 5% Each 90

Komposisi Pemegang Saham berdasarkan Status Kepemilikan / Shareholders Composition by Ownership Status 90

Struktur Pemegang Saham Utama dan Pengendali / Main and Controlling Shareholders Structure 91

Infomasi Entitas Anak, Perusahaan Asosiasi, Perusahaan Ventura Bersama, dan *Special Purpose Vehicle* / Information on Subsidiaries, Associated Entities, Joint Venture Companies, and Special Purpose Vehicles 92

Kronologi Pencatatan Saham / Chronology of Share Listing 93

Kronologi Pencatatan Efek Lainnya / Chronology of Other Securities Listing 94

Struktur Grup / Group Structure 97

Informasi Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik / Information on the Use of Public Accountant Services and Public Accounting Firms 97

Lembaga dan Profesi Penunjang Pasar Modal / Capital Market Supporting Institutions 98

Analisis dan Pembahasan Manajemen
Management Discussion and Analysis

Tinjauan Ekonomi dan Industri / Economic and Industrial Overview 102

Tinjauan Operasional / Operational Overview 104

Tinjauan Keuangan / Financial Overview 122

Aspek Pendukung Bisnis
Aspect of Business Support

Teknologi Informasi / Information Technology 152

Tata Kelola Perusahaan
Good Corporate Governance

Dasar dan Prinsip Implementasi GCG / Basis and Principles of GCG Implementation 162
Struktur GCG / GCG Structures 163
Framework GCG / GCG Framework 164
Peningkatan Kualitas Implementasi GCG / Improvement of GCG Implementation Quality 164
Rapat Umum Pemegang Saham / General Meeting of Shareholders 168
Dewan Komisaris / Board of Commissioners 171
Direksi / Board of Directors 177
Rangkap Jabatan Dewan Komisaris dan Direksi / Concurrent Positions of the Board of Commissioners and Board of Directors 181
Penilaian Kinerja Dewan Komisaris, Direksi, Komite Pendukung Dewan Komisaris, serta Komite dan Organ Pendukung Direksi / Performance Assessment of the Board of Commissioners, Board of Directors, Board of Commissioners' Supporting Committees, and Board of Directors' Committees and Supporting Organs 182
Pelatihan dan/atau Peningkatan Kompetensi Dewan Komisaris dan Direksi / Training and/or Competency Development for the Board of Commissioners and Board of Directors 188
Penanganan Benturan Kepentingan Dewan Komisaris dan Direksi / Handling of Conflict of Interests of the Board of Commissioners and Board of Directors 191
Mekanisme Pengunduran Diri dan Pemberhentian Dewan Komisaris dan Direksi / Resignation and Dismissal Mechanism of the Board of Commissioners and Board of Directors 191
Kebijakan Keberagaman Komposisi Dewan Komisaris dan Direksi / Diversity Policy of Composition of the Board of Commissioners and Board of Directors 192
Kebijakan Nominasi dan Remunerasi Dewan Komisaris dan Direksi / Nomination and Remuneration Policy of the Board of Commissioners and Board of Directors 193
Komite di bawah Dewan Komisaris / Board of Commissioners' Subordinate Committees 199
Organ Pendukung Dewan Komisaris / Board of Commissioners Supporting Organ 213
Komite di bawah Direksi / Board of Directors' Subordinate Committees 214
Organ Pendukung Direksi / Board of Directors' Supporting Organ 228
Akuntan Publik / Public Accountant 236
Sistem Pengendalian Internal / Internal Control System 238
Fungsi Kepatuhan / Compliance Function 242
Pengadaan Barang dan Jasa / Procurement of Goods and Services 248
Perkara Hukum / Legal Cases 249
Sanksi Administratif Tahun 2023 / Administrative Sanction in 2023 254
Program Anti Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal / Anti Money Laundering, Counter Financing of Terrorism, and Counter-Proliferation Financing of Weapons of Mass Destruction Program 255
Pemberian Dana Kegiatan Politik / Provision of Funds for Political Activities 258
Persaingan Usaha yang Sehat / Fair Business Competition 258
Kode Etik / Code of Conduct 259
Program Kepemilikan Saham oleh Manajemen dan Karyawan / Management/Employee Stock Ownership Program 262
Kebijakan Pengungkapan Informasi / Information Disclosure Policy 262
Kebijakan Anti Korupsi / Anti Corruption Policy 262
Pengendalian Gratifikasi / Gratification Control 263
Kebijakan Pencegahan *Insider Trading* / Policy to Prevent Insider Trading 264
Sistem Pelaporan Pelanggaran / Whistleblowing System 265
Akses Informasi dan Data Perusahaan / Access to Company's Information and Data 268
Implementasi Tata Kelola Perusahaan Terbuka / Implementation of Corporate Governance of Public Company 269
Pedoman Umum Governansi Korporat Indonesia / General Guidelines for Indonesian Corporate Governance 274
Rencana Strategis Bank / Bank's Strategic Plans 293
Pembelian Kembali Saham dan/atau Obligasi / Shares and/or Bonds Buy Back 295
Penyediaan Dana kepada Pihak Terkait dan/atau Penyediaan Dana Besar / Provision of Funds to Related Parties and/or Provision of Large Exposure 295
Kepatuhan Perpajakan / Tax Compliance 296
Transparansi Kondisi Keuangan dan Non-Keuangan Bank yang Belum Diungkap dalam Laporan Lain / Transparency of the Bank's Financial and Non-Financial Conditions that Have Not Been Disclosed in Other Report 296
Informasi Lain terkait Tata Kelola Bank / Other Information related to Bank Governance 296
Pernyataan dan Praktik *Bad Corporate Governance* / Statement and Practices of Bad Corporate Governance 297

Struktur Permodalan dan Manajemen Risiko
Capital Structure and Risk Management

Pengungkapan Permodalan / Disclosure of Capital 300
Manajemen Risiko / Risk Management 303
Manajemen Risiko Grup Keuangan Victoria / Victoria Financial Group Risk Management 336

Tanggung Jawab Sosial dan Lingkungan Hidup
Corporate Social and Environmental Responsibility

Tata Kelola Keberlanjutan / Sustainability Governance 388
Keberlanjutan Kinerja Ekonomi / Economic Performance Sustainability 391
Keberlanjutan Kinerja Sosial / Social Performance Sustainability 396
Keberlanjutan Kinerja Lingkungan Hidup / Environmental Performance Sustainability 414
Indeks Pengungkapan Kriteria POJK No. 51/POJK.03/2017 / POJK Criteria Disclosure Index No. 51/POJK.03/2017 419
Tanggapan terhadap Umpan Balik Laporan Tahun Sebelumnya / Responses to Previous Year's Report Feedback 422
Verifikasi Tertulis dari Pihak Independen / Written Verification from an Independent Party 422
Lembar Umpan Balik / Feedback Form 423

KILAS KINERJA

Performance Highlights



Dana Pihak Ketiga
Third-Party Funds

15.78%

2023	2022
Rp22.43 triliun / trillion	Rp19.37 triliun / trillion

Pinjaman yang Diberikan - Bersih
Loans - Net

18.10%

2023	2022
Rp18.05 triliun / trillion	Rp15.29 triliun / trillion

Pendapatan Bunga dan Syariah
Interest and Sharia Income

7.71%

2023	2022
Rp1.84 triliun / trillion	Rp1.71 triliun / trillion



Ikhtisar Kinerja Keberlanjutan
Sustainability Performance Highlights

Keberlanjutan Kinerja Ekonomi

Economic Performance Sustainability

Kinerja Keuangan

Financial Performance

(dalam juta Rupiah / in million Rupiah)

Uraian	2023	2022	2021	Description
Laporan Posisi Keuangan Konsolidasian* / Consolidated Statements of Financial Position*				
Total Aset	**29,624,240**	**25,932,001**	**24,947,143**	**Total Assets**
Total Aset Keuangan	**28,453,735**	24,310,285	22,964,930	Total Financial Assets
Total Aset Non-Keuangan	**1,170,505**	1,621,716	1,982,213	Total Non-Financial Assets
Total Liabilitas	**25,799,455**	**22,231,538**	**20,702,226**	**Total Liabilities**
Total Liabilitas Keuangan	**25,730,307**	22,160,500	20,595,756	Total Financial Liabilities
Total Liabilitas Non-Keuangan	**69,148**	71,038	106,469	Total Non-Financial Liabilities
Total Dana Syirkah Temporer	**-**	-	**1,230,492**	**Total Temporary Syirkah Fund**
Total Ekuitas	**3,824,785**	**3,700,463**	**3,014,425**	**Total Equity**
Laporan Laba Rugi dan Penghasilan Komprehensif Lain Konsolidasian * / Consolidated Statements of Profit or Loss and Other Comprehensive Income*				
Pendapatan Bunga dan Syariah	**1,836,391**	1,705,018	1,612,210	Interest and Sharia Income
Beban Bunga dan Syariah	**(1,257,662)**	(971,638)	(1,148,556)	Interest and Sharia Expense
Pendapatan Bunga dan Syariah Bersih	**578,729**	733,381	463,654	Interest and Sharia Income - Net
Pendapatan Operasional Lainnya	**253,365**	380,203	454,233	Other Operating Income
Beban Operasional Lainnya	**(658,023)**	(699,517)	(1,004,873)	Other Operating Expenses
Laba/(Rugi) Operasional	**174,071**	414,066	(86,985)	Profit/(Loss) from Operations
Beban Non-Operasional - Bersih	**(44,535)**	(57,136)	(63,883)	Non-Operating Expense - Net
Laba/(Rugi) Sebelum Beban Pajak Penghasilan	**129,536**	356,931	(150,868)	Profit/(Loss) Before Income Tax Expense
(Beban)/Manfaat Pajak Penghasilan - Bersih	**(27,720)**	(130,757)	31,805	Income Tax (Expense)/Benefit - Net
Laba/(Rugi) Bersih yang dapat Diatribusikan kepada:	**101,816**	226,173	(119,064)	Net Income/(Loss) Attributable to:
Pemilik Entitas Induk	**101,816**	226,173	(119,064)	Equity Holders of the Parent Entity
Kepentingan Nonpengendali	**-**	-	(0)	Non-Controlling Interest
Penghasilan (Rugi) Komprehensif Lain, Setelah Pajak Penghasilan	**24,405**	(70,239)	(67,416)	Other Comprehensive Income (Loss), Net of Income Tax
Penghasilan (Rugi) Komprehensif yang dapat Diatribusikan kepada:	**126,222**	155,935	(186,479)	Comprehensive Income (Loss) Attributable to:
Pemilik Entitas Induk	**126,222**	155,935	(186,478)	Equity Holders of the Parent Entity
Kepentingan Nonpengendali	**-**	-	(1)	Non-Controlling Interest
Laba (Rugi) Bersih per Saham yang dapat Diatribusikan kepada Pemilik Entitas Induk				Income (Loss) per Share Attributable to Entity Holders of the Parent Entity
Dasar (Rupiah penuh)	**6.42**	19.17	(12.90)	Basic (full Rupiah)
Dilusian (Rupiah penuh)	**6.42**	19.17	(12.90)	Diluted (full Rupiah)

Uraian	2023	2022	2021	Description
Laporan Arus Kas Konsolidasian* / Consolidated Statements of Cash Flows*				
Arus Kas Bersih Diperoleh dari/ (Digunakan untuk) Aktivitas Operasi	**1,279,308**	1,057,052	(2,246,858)	Net Cash Flow (Used in)/Provided from Operating Activities
Arus Kas Bersih Digunakan untuk/ (Diperoleh dari) Aktivitas Investasi	**(1,413,275)**	(232,938)	1,233,396	Net Cash Flows Used in/(Provided from) Investing Activities
Arus Kas Bersih Diperoleh dari Aktivitas Pendanaan	**287,343**	159,950	395,586	Net Cash Flows Provided from Financing Activities
Kas dan Setara Kas pada Akhir Tahun	**2,798,564**	2,645,188	1,886,562	Cash and Cash Equivalents at End of the Year
Rasio Keuangan (dalam %) / Financial Ratios (in %)****				
Permodalan				**Capital**
KPMM dengan Memperhitungkan Risiko Kredit dan Operasional	**20.69**	22.59	17.92	CAR by Calculating Credit and Operational Risk
KPMM dengan Memperhitungkan Risiko Kredit, Operasional, dan Pasar	**19.95**	21.97	17.49	CAR by Calculating Credit, Operational, and Market Risk
Aktiva Tetap terhadap Modal	**11.08**	11.60	17.32	Fixed Assets to Capital
Aset Produktif				**Earning Assets**
Aset Produktif dan Non-Produktif Bermasalah terhadap Total Aset Produktif dan Non-Produktif	**3.91**	5.89	8.23	Non-Performing Earning Assets and Non-Earning Assets to Total Earning Assets and Non-Earning Assets
Aset Produktif Bermasalah terhadap Total Aset Produktif	**2.79**	3.19	5.19	Non-Performing Earning Assets to Total Earning Assets
Cadangan Kerugian Penurunan Nilai (CKPN) Aset Keuangan terhadap Aset Produktif	**2.19**	2.49	3.13	Allowance for Impairment Losses (CKPN) of Financial Assets to Earning Assets
Pemenuhan CKPN Aset Produktif	**165.67**	198.55	202.01	CKPN Fulfillment of Earning Assets
NPL Bruto	**3.99**	4.23	7.27	Gross NPL
NPL Neto	**3.24**	3.42	4.08	Net NPL
Profitabilitas				**Profitability**
ROA	**0.48**	1.47	(0.71)	ROA
ROE	**3.12**	9.48	(6.54)	ROE
NIM	**2.58**	3.52	2.36	NIM
BOPO	**91.67**	79.44	104.94	BOPO
Rasio Laba (Rugi) terhadap Total Aset	**0.34**	0.87	(0.50)	Income (Loss) to Total Assets Ratio
Rasio Laba (Rugi) terhadap Total Ekuitas	**2.66**	7.56	(3.95)	Income (Loss) to Total Equity Ratio
Rasio Laba (Rugi) terhadap Pendapatan Bunga	**17.59**	13.27	(7.39)	Income (Loss) to Interest Income
Rasio Liabilitas terhadap Total Aset	**87.09**	85.73	87.50	Liabilities to Total Assets Ratio
Rasio Liabilitas terhadap Total Ekuitas	**674.53**	743.53	687.54	Liabilities to Total Equity Ratio
Likuiditas				**Liquidity**
LDR	**83.06**	81.69	81.25	LDR

Uraian	2023	2022	2021	Description
LFR	50.55	81.08	79.89	LFR
Rasio Aktiva Keuangan terhadap Liabilitas Keuangan	114.83	98.75	91.20	Financial Assets to Financial Liabilities Ratio
Kepatuhan				**Compliance**
Persentase Pelanggaran BMPK				Percentage of LLL Violation
Pihak Terkait	0.00	0.00	0.00	Related Parties
Pihak Tidak Terkait	0.00	0.00	0.00	Non-Related Parties
Persentase Pelampauan BMPK				Percentage of LLL Excess
Pihak Terkait	0.00	0.00	0.00	Related Parties
Pihak Tidak Terkait	0.00	0.00	0.00	Non-Related Parties
GWM Primer – Rupiah	7.32	7.69	3.57	Primary Minimum Reserve Requirements - Rupiah
GWM Primer – Valas	4.05	4.05	4.05	Secondary Minimum Reserve Requirements – Foreign Exchange
GWM Sekunder – Rupiah	23.73	22.82	14.97	Secondary Minimum Reserve Requirements - Rupiah
Posisi Devisa Neto (PDN) secara Keseluruhan	0.39	0.12	0.98	Net Open Position (NOP) in Overall

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022. / Consolidated until the divestment of Subsidiary on 22 December 2022.
** Merupakan angka PT Bank Victoria International Tbk. / This figure refers to PT Bank Victoria International Tbk.

Kinerja Operasional

Operational Performance

Uraian	2023	2022	2021	Description
Produk Simpanan (dalam unit rekening)* / Deposit Products (in account unit)*				
Tabungan	41,191	42,100	45,057	Saving Deposits
Giro	2,564	2,461	2,508	Current Accounts
Deposito Berjangka	18,931	16,947	18,503	Time Deposits
Total	62,686	**61,508**	**66,068**	**Total**
Produk Pinjaman (dalam juta Rupiah) / Loan Products (in million Rupiah)****				
Pinjaman Tetap	9,697,513	8,860,926	9,336,405	Fixed Loans
Pinjaman Konsumen	164,627	167,465	161,842	Consumer Loans
Pinjaman Rekening Koran	1,871,767	1,677,755	1,510,730	Overdraft Loans
Pinjaman Tetap dengan Angsuran	6,864,293	5,078,177	3,627,712	Fixed Loans with Installments
Pinjaman Serba Guna	30,543	40,288	46,416	Multipurpose Loans
Pembiayaan Syariah	-	-	805,969	Sharia Financing
Total	18,628,743	**15,824,611**	**15,489,074**	**Total**

* Merupakan angka PT Bank Victoria International Tbk. / This figure refers to PT Bank Victoria International Tbk.
** Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022. / Consolidated until the divestment of Subsidiary on 22 December 2022.

Keberlanjutan Kinerja Sosial

Social Performance Sustainability

Uraian	Satuan Unit	2023	2022	2021	Description
Pengelolaan *Human Capital* / Human Capital Management					
Jumlah Karyawan	Orang People	713	688	694	Total Employees
Karyawan Wanita	%	47.55	47.09	46.97	Female Employees
Jam Pelatihan/Karyawan	Jam/Orang Hours/People	5	4	4	Training Hours/Employee
Karyawan Lokal*	%	67.46	66.86	67.43	Local Employees*
Pengembangan Sosial dan Kemasyarakatan / Social and Community Development					
Penerima Manfaat	Orang People	2,072	2,121	4,079	Beneficiaries
Biaya Investasi Sosial	Rupiah	179,610,888	238,215,664	643,477,844	Social Investment Cost

* Karyawan yang memiliki domisili yang sesuai dengan wilayah operasional tempat bekerja. / Employees having domicile in accordance with the operational area where they work.

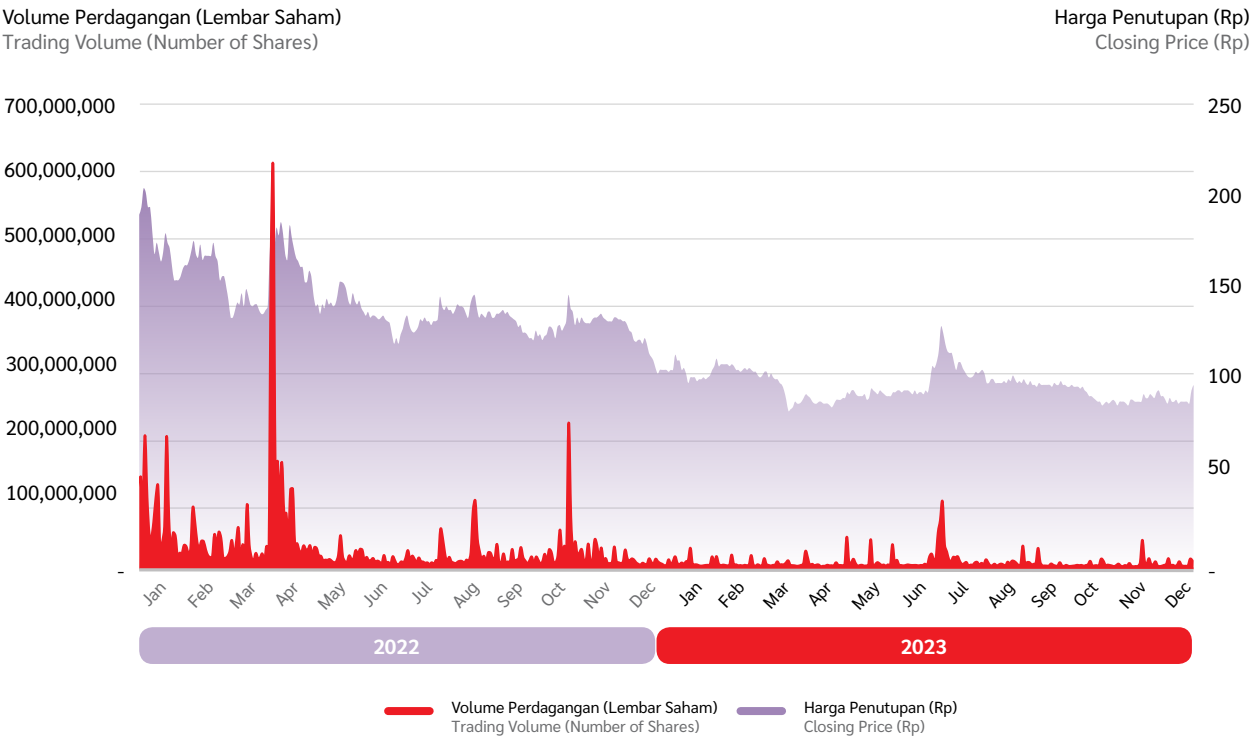
Keberlanjutan Kinerja Lingkungan Hidup

Environmental Performance Sustainability

Uraian	Satuan Unit	2023	2022	2021	Description
Pembiayaan Pertimbangan Aspek Lingkungan	Juta Rupiah Million Rupiah	505,058	617,423	602,687	Financing by Considering Environmental Aspect
Debitur yang Memperoleh PROPER	Entitas Entity	-	-	-	Debtor Receiving PROPER
Penggunaan Listrik	GJ	4,774.83	4,442.55	4,459.18	Use of Electricity
Penggunaan Bahan Bakar Minyak (BBM)	GJ	2,262.32	2,879.76	2,711.33	Use of Fuel (BBM)
Penggunaan Air	m^3	18,746.74	5,494.06	5,756.90	Water Use
Penggunaan Kertas	Rim Ream	1,935	1,703	1,847	Paper Use

Ikhtisar Saham
Share Highlights

Periode Period	Harga Pembukaan Opening Price (Rp)	Harga Terendah Lowest Price (Rp)	Harga Tertinggi Highest Price (Rp)	Harga Penutupan Closing Price (Rp)	Volume Transaksi (Lembar Saham) Transaction Volume (Number of Shares)	Jumlah Saham Beredar (Lembar Saham) Total Outstanding Shares (Number of Shares)	Kapitalisasi Pasar Market Capitalization (Rp)
2023							
Quarter I	107	85	118	93	323,118,200	15,848,234,714	1,473,885,828,402
Quarter II	88	87	104	95	260,058,800	15,848,234,955	1,505,582,320,725
Quarter III	101	97	135	99	641,361,400	15,848,235,599	1,568,975,324,301
Quarter IV	105	89	106	99	369,707,600	15,848,235,778	1,568,975,342,022
2022							
Quarter I	195	130	195	139	2,502,377,700	10,487,132,568	1,457,711,426,952
Quarter II	174	132	187	132	2,327,482,600	10,487,132,568	1,384,301,498,976
Quarter III	132	120	156	124	1,000,569,300	13,040,594,487	1,617,033,716,388
Quarter IV	124	104	142	107	1,126,040,200	15,848,234,714	1,695,761,114,398



Aksi Korporasi

Pada tahun 2023, Bank Victoria melakukan Pencatatan Penambahan Saham Hasil *Exercise* Waran Seri VII PT Bank Victoria lnternational Tbk dengan jangka waktu pelaksanaan tanggal 19 Juni 2023 sampai tanggal 18 Desember 2025. Total saham yang telah diterbitkan dan sisa waran menjadi sebagai berikut:

Corporate Actions

In 2023, Bank Victoria carried out Additional Share Listing Resulting from Exercise of Series VII Warrants of PT Bank Victoria International Tbk with an implementation period of 19 June 2023 to 18 December 2025. The total shares issued and remaining warrants are as follows:

Waktu Time	Jumlah Saham Sebelum Penambahan Saham Hasil *Exercise* Waran Seri VII Number of Shares Before Addition of Shares Resulting from Exercise of Series VII Warrants	Jumlah Penambahan Waran Seri VII Number of Additional Series VII Warrants	Jumlah Saham Setelah Penambahan Saham Hasil Exercise Waran Seri VII Number of Shares After Addition of Shares Resulting from Exercise of Series VII Warrants	Sisa Waran Seri VII Remaining Series VII Warrants
Juni 2023 June 2023	15,848,234,714	241	15,848,234,955	2,573,669,876
Juli 2023 July 2023	15,848,234,955	467	15,848,235,422	2,573,669,409
Agustus 2023 August 2023	15,848,235,422	93	15,848,235,515	2,573,669,316
September 2023	15,848,235,515	84	15,848,235,599	2,573,669,232
Oktober 2023 October 2023	15,848,235,599	134	15,848,235,733	2,573,669,098
November 2023	15,848,235,733	33	15,848,235,766	2,573,669,065
Desember 2023 December 2023	15,848,235,766	12	15,848,235,778	2,573,669,053

Bank Victoria juga melakukan penawaran umum Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 yaitu pada Maret 2023 sebesar Rp500.000.000.000,-. Obligasi ini ditawarkan dengan nilai 100% dari nilai pokok obligasi dan terdiri dari 2 seri, yaitu jumlah pokok Obligasi Seri A ditawarkan sebesar Rp300.000.000.000,- dengan tingkat bunga tetap sebesar 9,25% per tahun dengan jangka waktu 3 tahun sejak tanggal emisi, dan jumlah pokok Obligasi Seri B ditawarkan sebesar Rp200.000.000.000,- dengan tingkat bunga tetap sebesar 10,25% per tahun dengan jangka 5 tahun sejak tanggal emisi. Bunga obligasi dibayarkan setiap 3 bulan sekali terhitung sejak tanggal emisi pada tanggal pembayaran bunga obligasi pertama kali yaitu tanggal 9 Juni 2023, sedangkan pembayaran bunga obligasi terakhir akan dilakukan pada tanggal jatuh tempo masing-masing seri obligasi yaitu pada tanggal 9 Maret 2026 untuk Obligasi Seri A dan 9 Maret 2028 untuk Obligasi Seri B.

Bank Victoria also carried out public offering of Bank Victoria Sustainable Bonds III Phase I Year 2023, which was in March 2023, amounted to Rp500,000,000,000. These bonds are offered at a value of 100% of the principal value of bonds and consist of 2 series, namely Series A Bonds offered in the amount of Rp300,000,000,000 with fixed rate of 9.25% per annum with a tenor of 3 years since emission date, and Series B Bonds offered in the amount of Rp200,000,000,000 with fixed rate of 10.25% per annum with a tenor of 5 years since emission date. Interest of the bond paid every 3 months starting from emission date, 9 June 2023, for the first payment whereas the last payment will be at the maturity date of each bonds, which on 9 March 2026 for Bonds Series A and on 9 March 2028 for Bonds Series B.

Aktivitas Perdagangan Saham

Bank tidak menerima sanksi atas aktivitas perdagangan saham, baik berupa penghentian sementara ataupun penghapusan pencatatan saham sepanjang tahun 2023.

Share Trading Activity

No sanctions are imposed on the share trading activities of the Bank, either in form of temporary suspension on share trading or share delisting throughout 2023.

Ikhtisar Obligasi
Bonds Highlights

Uraian Description	Jumlah (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Dates	Peringkat Ratings		Status Pembayaran Payment Status
					2023	2022	
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dengan tingkat bunga tetap Bank Victoria Continuous Subordinated Bond I Phase I of 2017 at fixed interest rate	50,000	7	11.00	11 Juli 2017 - 11 Juli 2024 11 July 2017 - 11 July 2024	idBBB (*Triple B*)	idBBB (*Triple* B)	Belum Lunas Not Paid
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat bunga tetap Seri B Bank Victoria Continuous Bond I Phase II of 2018 at fixed interest rate B Series	200,000	5	10.30	5 Juni 2018 - 5 Juni 2023 5 June 2018 - 5 June 2023	idA- (*Single A Minus*)	idA- (*Single* A *Minus*)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat bunga tetap Bank Victoria Continuous Subordinated Bond I Phase II of 2018 at fixed interest rate	350,000	7	11.00	5 Juni 2018 - 5 Juni 2025 5 June 2018 - 5 June 2025	idBBB (*Triple B*)	idBBB (*Triple* B)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 Bank Victoria Continuous Subordination Bonds II Phase I Year 2019	250,000	7	11.75	28 Juni 2019 - 28 Juni 2026 28 June 2019 - 28 June 2026	idBBB (*Triple B*)	idBBB (*Triple* B)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 Bank Victoria Continuous Subordination Bonds II Phase II Year 2019	150,000	7	11.25	8 November 2019 - 8 November 2026	idBBB (*Triple B*)	idBBB (*Triple* B)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 Bank Victoria Continuous Subordination Bonds II Phase III Year 2020	60,000	7	11.25	1 April 2020 - 1 April 2027	idBBB (*Triple B*)	idBBB (*Triple* B)	Belum Lunas Not Paid
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 dengan tingkat bunga tetap Seri A Bank Victoria Series A Continuing Bonds III Phase I Year 2023 at fixed interest rate	300,000	3	9.25	9 Maret 2023 - 9 Maret 2026 9 March 2023 - 9 March 2026	idA- (*Single A Minus*)	-	Belum Lunas Not Paid
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 dengan tingkat bunga tetap Seri B Bank Victoria Series B Continuing Bonds III Phase I Year 2023 at fixed interest rate	200,000	5	10.25	9 Maret 2023 - 9 Maret 2028 9 March 2023 - 9 March 2028	idA- (*Single A Minus*)	-	Belum Lunas Not Paid

Keterangan *rating* / Rating description:
* idA- (*Single* A Minus) dari PT Pemeringkat Efek Indonesia (PEFINDO). / idA- (Single A Minus) from PT Pemeringkat Efek Indonesia (PEFINDO).
* idBBB (*Triple* B) dari PT Pemeringkat Efek Indonesia (PEFINDO). / idBBB (Triple B) from PT Pemeringkat Efek Indonesia (PEFINDO).

Peristiwa Penting
Significant Events



28 Januari / January 2023

Bank Victoria melaksanakan Rapat Kerja di Hotel Indonesia Kempinski, Jakarta. Rapat Kerja Bank Victoria kali ini mengusung tema "*Moving Forward to Accelerated Growth and Stronger Governance*" yang merupakan kelanjutan dari strategi Bank sebelumnya.

Bank Victoria held a Working Meeting at Hotel Indonesia Kempinski, Jakarta. This time, Bank Victoria's Working Meeting carried the theme "Moving Forward to Accelerated Growth and Stronger Governance" which is a continuation of the Bank's previous strategy.

9 Maret / March 2023

Bank Victoria menerbitkan Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 sebesar Rp500.000.000.000,-.

Bank Victoria issued Bank Victoria Continuing Bonds III Phase I Year 2023 amounting to Rp500,000,000,000.



19 Mei / May 2023

Tim *Corporate Secretary* dan *Corporate Communication* Bank Victoria meraih penghargaan *The Best Corporate Secretary & Communication Award* 2023 oleh Majalah Economic Review, Ideku Group, dan Indonesia-Asia Institute.

Bank Victoria's Corporate Secretary and Corporate Communication team won the Best Corporate Secretary & Communication Award 2023 by Economic Review Magazine, Ideku Group, and Indonesia-Asia Institute.



26 Mei / May 2023

Bank Victoria melaksanakan Rapat Umum Pemegang Saham Tahunan 2023 di Graha BIP, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930.

Bank Victoria held the 2023 Annual General Meeting of Shareholders at Graha BIP, Jl. Gatot Subroto Kav. 23, South Jakarta 12930.



27 Juni / June 2023

Bank Victoria meraih penghargaan *4th Indonesia Top Bank Award* 2023 kategori Kelompok Bank Modal Inti (KBMI) 1 oleh The Economics. Penghargaan tersebut sebagai apresiasi kepada bank-bank di Indonesia dalam acara *4th Indonesia Top Bank Award 2023.*

Bank Victoria won the 4th Indonesia Top Bank Award 2023 in the Core Capital Bank Group (KBMI) 1 category by The Economics. This award is an appreciation for banks in Indonesia at the 4th Indonesia Top Bank Award 2023 event.



18 Juli / July 2023

Gathering ORI023 Bank Victoria Manado.

Gathering of ORI023 at Bank Victoria Manado.



28 Juli / July 2023

Bank Victoria meraih penghargaan Indonesia *Best Bank* 2023 *for The Development of Banking Business Segmentatition* kategori KBMI 1 oleh Warta Ekonomi.

Bank Victoria won the Indonesia Best Bank 2023 award for The Development of Banking Business Segmentation in the KBMI 1 category by Warta Ekonomi.



28 Juli / July 2023

Bank Victoria meraih penghargaan *The Best Indonesia Sales Marketing Award VI 2022* kategori *Public Company Bank* oleh Majalah Economic Review.

Bank Victoria won the Best Indonesia Sales Marketing Award VI 2022 in the Public Company Bank category by Economic Review Magazine.



15 Agustus / August 2023

Bank Victoria meraih penghargaan *Best Bank Performance of MSMEs Loan Awards* 2023 dengan predikat "Sangat Prima" kategori Modal Inti sampai dengan Rp6 triliun (KBMI 1) oleh Majalah Peluang.

Bank Victoria won the Best Bank Performance of MSMEs Loan Awards 2023 with title "Very Excellent" in the Core Capital category of up to Rp6 trillion (KBMI 1) by Peluang Magazine.



12 September / September 2023

Bank Victoria melakukan penandatanganan Addendum Perjanjian Kredit Sindikasi kepada PT Sulfindo Adiusaha dengan total plafon sebesar maksimal Rp1,5 triliun.

Bank Victoria signed an Addendum to the Syndicated Credit Agreement with PT Sulfindo Adiusaha with a total ceiling of Rp1.5 trillion.



5 Oktober / October 2023

Bank Victoria merayakan ulang tahun ke-29. Acara dihadiri oleh Dewan Komisaris dan Direksi serta karyawan Bank Victoria. Dengan perayaan ini, diharapkan Bank Victoria ke depan dapat memberikan inovasi-inovasi terbaik untuk melayani kebutuhan nasabah setia Bank Victoria dan memberikan pelayanan terbaik kepada seluruh Pemangku Kepentingan Bank Victoria.

Bank Victoria celebrated its 29th anniversary. The event was attended by the Board of Commissioners and Board of Directors as well as Bank Victoria employees. With this celebration, it is hoped that Bank Victoria in the future will be able to provide best innovations to serve the needs of loyal Bank Victoria customers and provide best services to all Bank Victoria Stakeholders.



29 Oktober / October 2023

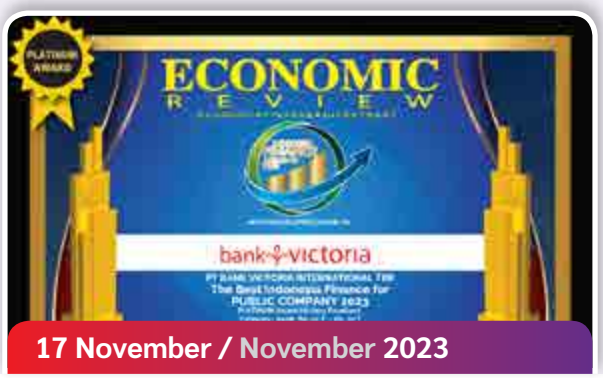
Bank Victoria menyelenggarakan *event* Victoria Run 2023 di QBIG BSD.
Bank Victoria held the Victoria Run 2023 event at QBIG BSD.



16 November / November 2023

Bank Victoria melaksanakan kegiatan CSR melalui Victoria Peduli dengan memberikan bantuan di bidang kesehatan kepada SDS Dewi Sartika Cilincing, Jakarta Utara.

Bank Victoria carried out CSR activities through Victoria Peduli by providing assistance in health sector to SDS Dewi Sartika Cilincing, North Jakarta.



17 November / November 2023

Bank Victoria meraih penghargaan *The Best Indonesia Finance for Public Company* 2023 kategori *Asset* Rp20 T–Rp30 T oleh Economic Review.

Bank Victoria won the Best Indonesia Finance for Public Company 2023 award in Asset of Rp20 T–Rp30 T category by the Economic Review.



8 Desember / December 2023

Bank Victoria berhasil meraih penghargaan *Gold Award-Excellent* Indonesia IT *Award* V 2023 kategori *The Best IT-for* Bank Aset Rp20 T-Rp30 T oleh Economic Review.

Bank Victoria managed to win the Gold Award-Excellent Indonesia IT Award V 2023 in category of The Best IT-for Bank Assets of Rp20 T-Rp30 T by the Economic Review.



Penghargaan dan Sertifikasi
Awards and Certifications



1



2



4



4

1. ***The Best Indonesia Corporate "Secretary & Communication" Award* 2023 kategori *Gold Award - Score: 88,50 - Excellent***
   The Best Indonesia Corporate "Secretary & Communication" Award 2023 Gold Award - Score: 88.50 - Excellent category

   Tanggal / Dated:
   19 Mei 2023 / 19 May 2023

   Acara / Event:
   Indonesia Corporate Secretary & Communication Award VIII 2023

   Penerima / Awardee:
   Tim *Corporate Secretary* dan *Corporate Communication* Bank Victoria
   Bank Victoria's Corporate Secretary and Corporate Communication Team

   Penyelenggara / Organizer:
   Majalah Economic Review, Ideku Group, dan Indonesia-Asia Institute.
   Economic Review Magazine, Ideku Group, and Indonesia-Asia Institute.

2. **4th *Indonesia Top Bank Award* 2023 kategori Kelompok Bank Modal Inti (KBMI) 1**
   4th Indonesia Top Bank Award 2023 in Core Capital Bank Group (KBMI) 1 category

   Tanggal / Dated:
   27 Juni 2023 / 27 June 2023

   Acara / Event:
   Indonesia Top Bank Awards 2023

   Penerima / Awardee:
   Bank Victoria

   Penyelenggara / Organizer:
   The Economics

3. ***Indonesia Best Bank* 2023 *for The Development of Banking Business Segmentatition* kategori KBMI 1**
   Indonesia Best Bank 2023 for The Development of Banking Business Segmentation KBMI 1 category

   Tanggal / Dated:
   28 Juli 2023 / 28 July 2023

   Acara / Event:
   Indonesia Best Bank Awards 2023

   Penerima / Awardee:
   Bank Victoria

   Penyelenggara / Organizer:
   Warta Ekonomi



5



6



7

4. ***The Best Indonesia Sales Marketing Award VI 2023*** **kategori *Platinum Award - Score : 93,36 - Very Excellent***
The Best Indonesia Sales Marketing Award VI 2023 in Platinum Award category - Score : 93.36 - Very Excellent category

Tanggal / Dated:
28 Juli 2023 / 28 July 2023

Acara / Event:
6th Indonesia Sales & Marketing Award 2023

Penerima / Awardee:
Bank Victoria

Penyelenggara / Organizer:
Majalah Economic Review

5. ***Best Bank Performance of MSMEs Loan Awards*** **2023 dengan predikat "Sangat Prima" kategori Modal Inti sampai dengan Rp6 triliun (KBMI 1)**
Best Bank Performance of MSMEs Loan Awards 2023 with title "Very Excellent" in the Core Capital category of up to Rp6 trillion (KBMI 1)

Tanggal / Dated:
15 Agustus 2023 / 15 August 2023

Acara / Event:
Best Bank Performance of MSMEs Loans Award 2023

Penerima / Awardee:
Bank Victoria

Penyelenggara / Organizer:
Majalah Peluang

6. ***The Best Indonesia Finance for Public Company*** **2023 kategori *Platinum Award (A) Very Excellent Asset* Rp20 T–Rp30 T**
The Best Indonesia Finance for Public Company 2023 in Platinum Award (A) Very Excellent category of Asset of Rp20 T–Rp30 T

Tanggal / Dated:
17 November 2023

Acara / Event:
Indonesia Finance Award VI 2023

Penerima / Awardee:
Bank Victoria

Penyelenggara / Organizer:
Economic Review

7. ***Gold Award-Excellent Indonesia IT Award V 2023*** **kategori *The Best IT-for Bank* Aset Rp20T-Rp30 T**
Gold Award-Excellent Indonesia IT Award V 2023 in the category of The Best IT-for Bank Assets of Rp20 T-Rp30 T

Tanggal / Dated:
8 Desember 2023 / 8 December 2023

Acara / Event:
Indonesia IT Award V 2023

Penerima / Awardee:
Bank Victoria

Penyelenggara / Organizer:
Economic Review

LAPORAN MANAJEMEN

Performance Highlights





Laporan Dewan Komisaris

Board of Commissioners' Report



ZAENAL ABIDIN Ph.D
Komisaris Utama Independen
Independent President Commissioner

Pemegang Saham dan Pemangku Kepentingan yang Terhormat,
Dear Honorable Shareholders and Stakeholders,

Pertama-tama, mari kita bersama-sama memanjatkan puji dan syukur kepada Tuhan Yang Maha Esa karena atas segala nikmat dan karunia-Nya, Bank Victoria dapat melalui tahun 2023 dengan sejumlah pencapaian yang membanggakan. Dalam kesempatan yang baik ini, perkenankan saya mewakili Dewan Komisaris menyampaikan laporan pengawasan pengelolaan usaha Bank Victoria untuk tahun buku 2023. Pada laporan ini, kami berharap dapat memberikan gambaran yang jelas mengenai berbagai hal berkaitan dengan pelaksanaan tugas dan tanggung jawab Dewan Komisaris, antara lain pengawasan terhadap implementasi strategi, penilaian kami terhadap kinerja Direksi, pandangan atas prospek usaha yang disusun oleh Direksi, pandangan atas penerapan tata kelola perusahaan, serta pandangan atas penerapan tanggung jawab sosial dan lingkungan Bank Victoria sepanjang tahun 2023.

First of all, we would like to send praise and gratitude to the God Almighty for all His blessings and gifts that Bank Victoria could go through 2023 with a number of proud achievements. On this auspicious occasion, allow me to represent the Board of Commissioners to deliver the supervisory report on Bank Victoria's business management for the 2023 fiscal year. In this report, we hope to provide a clear picture of various matters relating to the implementation of duties and responsibilities of Board of Commissioners, including strategy implementation supervision, our assessment of the Board of Directors' performance, views on business prospects prepared by the Board of Directors, views on the implementation of corporate governance, and views on Bank Victoria's implementation of social and environmental responsibility throughout 2023.



Kondisi Makroekonomi dan Industri Perbankan Tahun 2023

Kondisi makroekonomi global tahun 2023 dipengaruhi oleh berbagai tantangan yang berdampak pada terhambatnya laju pertumbuhan ekonomi global secara keseluruhan. Ketegangan geopolitik yang terus berlanjut, tingginya tingkat inflasi global, serta pengetatan kebijakan moneter oleh bank sentral di beberapa negara telah menjadi faktor utama yang memperlambat laju pertumbuhan ekonomi global tersebut. Pertumbuhan ekonomi global tahun 2023 mencapai 3,0%, melambat dibandingkan tahun 2022 sebesar 3,4%. Di tengah tren pelambatan pertumbuhan ekonomi global tersebut, perekonomian Indonesia menunjukkan daya tahan yang baik dengan mencatatkan pertumbuhan sebesar 5,04%. Dukungan kuat dari terjaganya daya beli dan konsumsi masyarakat, penurunan tingkat inflasi,

Macroeconomic Conditions and Banking Industry in 2023

Global macroeconomic conditions in 2023 were influenced by various challenges with impact on hampering the overall rate of global economic growth. The geopolitical tensions that went on, high levels of global inflation, and tightening monetary policy by central banks in several countries were main factors slowing down the rate of global economic growth. Global economic growth in 2023 reached 3.0%, slowing compared to that of 2022 of 3.4%. Amidst the trend of slowing global economic growth, the Indonesian economy showed good resilience by recording growth of 5.04%. Strong support from maintained people's purchasing power and consumption, decreased inflation rates, effective implementation of fiscal and monetary policies from the government, as well as continued realization of National

implementasi kebijakan fiskal dan moneter dari pemerintah yang efektif, serta keberlanjutan realisasi Proyek Strategis Nasional (PSN) menjadi pilar utama dalam mempertahankan ketahanan ekonomi Indonesia.

Strategic Projects (PSN) are the main pillars in maintaining Indonesia's economic resilience.

Dampak positif dari ketahanan ekonomi Indonesia ini terlihat pada kinerja berbagai sektor industri, termasuk sektor keuangan dan perbankan. Capaian kredit dan pertumbuhan dana pihak ketiga menunjukkan peningkatan dibandingkan tahun sebelumnya yang menggambarkan bahwa sektor perbankan mampu meraih kinerja yang positif di tengah tren kenaikan suku bunga yang berlangsung sepanjang tahun. Kinerja positif yang mampu diraih sektor perbankan ini juga mengindikasikan bahwa strategi dan inovasi yang dilakukan oleh para pelaku usaha di sektor perbankan dalam menghadapi tantangan eksternal telah memberikan hasil yang positif. Dengan adanya kepercayaan yang terus tumbuh dari para pemangku kepentingan, sektor perbankan memiliki peran strategis dalam mendukung pertumbuhan ekonomi yang inklusif dan berkelanjutan.

The positive impact of Indonesia's economic resilience can be seen in the performance of various industrial sectors, including financial and banking sectors. Credit achievements and growth in third party funds showed an increase compared to that of the previous year, reflecting that banking sector managed to achieve positive performance amidst the trend of increasing interest rates that lasted throughout the year. The positive performance achieved by banking sector also indicates that strategies and innovations carried out by business actors in banking sector in facing external challenges have provided positive results. With the continued growth of trust from stakeholders, the banking sector has a strategic role in supporting inclusive and sustainable economic growth.

Pengawasan terhadap Perumusan dan Implementasi Strategi Bank Victoria

Mencermati tantangan dan peluang yang berkembang sepanjang tahun 2023, Dewan Komisaris secara rutin melakukan pengawasan terhadap perumusan dan implementasi strategi Bank Victoria. Pada pelaksanaannya, Dewan Komisaris mengoptimalkan rapat gabungan bersama Direksi sebagai media utama dalam melakukan pengawasan terhadap perumusan dan implementasi strategi Bank Victoria. Pengawasan ini melibatkan penilaian menyeluruh terhadap pelaksanaan Rencana Bisnis Bank (RBB), seperti evaluasi terhadap aspek kuantitatif dan kualitatif dari pencapaian target finansial dan strategi bisnis. Selain itu, Dewan Komisaris juga secara teratur mengevaluasi faktor-faktor yang mempengaruhi kinerja Bank Victoria secara keseluruhan, seperti aspek permodalan, rentabilitas, serta manajemen risiko, dan GCG.

Supervision of Bank Victoria's Strategy Formulation and Implementation

With due observance of challenges and opportunities that developed throughout 2023, the Board of Commissioners routinely supervises the formulation and implementation of Bank Victoria's strategy. In its implementation, the Board of Commissioners optimizes joint meetings with the Board of Directors as the main media in supervising the formulation and implementation of Bank Victoria's strategy. In addition, the Board of Commissioners also regularly evaluates factors influencing Bank Victoria's overall performance, such as aspects of capital, profitability, risk management, and GCG.

Selain itu, Dewan Komisaris juga memberikan masukan-masukan yang strategis kepada Direksi terkait dengan berbagai aspek kinerja Bank Victoria. Hal ini bertujuan untuk memastikan bahwa Bank Victoria dapat menjaga keseimbangan antara pertumbuhan yang berkelanjutan dengan manajemen risiko yang efektif. Dengan pengawasan yang komprehensif serta rekomendasi yang konstruktif, Bank Victoria dapat mengidentifikasi peluang dan mengatasi tantangan yang muncul di pasar, serta memastikan bahwa strategi bisnis yang dijalankan sesuai dengan tujuan perusahaan untuk mencapai pertumbuhan yang berkelanjutan dan memberikan nilai tambah bagi para pemangku kepentingan.

Furthermore, the Board of Commissioners also provides strategic input to the Board of Directors regarding various aspects of Bank Victoria's performance. This aims to ensure that Bank Victoria can maintain a balance between sustainable growth and effective risk management. With comprehensive supervision and constructive recommendations, Bank Victoria is able to identify opportunities and overcome challenges arising in the market, and ensure that the implemented business strategy is in line with the Company's objectives to achieve sustainable growth and provide added value for stakeholders.

Penilaian terhadap Kinerja Direksi mengenai Pengelolaan Bank Victoria

Penilaian terhadap kinerja Direksi dalam pengelolaan Bank Victoria merupakan salah satu aspek penting dalam fungsi pengawasan atas pengelolaan Bank Victoria. Oleh karena itu,

Assessment of the Board of Directors' Performance regarding Management of Bank Victoria

Assessment of the Board of Directors' performance in managing Bank Victoria is an important aspect in supervisory function over the management of Bank Victoria. Therefore, the Board of

Dewan Komisaris secara berkala melakukan evaluasi yang mendalam terhadap kinerja Direksi dalam mengelola berbagai aspek operasional dan strategis Bank Victoria. Evaluasi ini mencakup penilaian terhadap pencapaian tujuan strategis Bank Victoria, efektivitas pengelolaan risiko, kualitas keputusan strategis yang diambil, serta transparansi dan integritas dalam menjalankan tugasnya. Selain itu, Dewan Komisaris juga mengevaluasi kemampuan Direksi dalam mengantisipasi dan merespons perubahan lingkungan eksternal, termasuk kondisi pasar, perubahan regulasi, dan tren industri perbankan. Kinerja Direksi juga dinilai berdasarkan kemampuan dalam memelihara stabilitas keuangan dan pertumbuhan yang sehat bagi Bank Victoria serta inisiatif dalam memajukan pelayanan kepada nasabah dan masyarakat secara keseluruhan.

Commissioners periodically conducts in-depth evaluations of the Board of Directors' performance in managing various operational and strategic aspects of Bank Victoria. This evaluation includes assessment of the achievement of Bank Victoria's strategic objectives, the effectiveness of risk management, the quality of strategic decisions made, and transparency and integrity in performing its duties. Furthermore, the Board of Commissioners also evaluates the Board of Directors' ability to anticipate and respond to changes in external environment, including market conditions, regulatory changes, and trends in banking industry. The Board of Directors' performance is also assessed based on its ability to maintain financial stability and healthy growth for Bank Victoria and its initiatives in advancing services to customers and community as a whole.

Berdasarkan hasil evaluasi yang dilakukan, kami mengapresiasi kinerja yang telah ditunjukkan oleh Direksi dalam mengoptimalkan pencapaian target-target yang telah ditetapkan sebelumnya. Dari aspek operasional, total simpanan Bank Victoria mencatatkan pertumbuhan sebesar 15,78%, yang menunjukkan keberhasilan dalam memperluas basis dana yang sangat penting bagi kegiatan operasional bank. Selain itu, capaian kredit mencatatkan pertumbuhan sebesar 17,72% menunjukkan komitmen Bank Victoria dalam mendukung pembiayaan bagi berbagai sektor ekonomi, yang merupakan salah satu indikator keberhasilan dalam mendukung pertumbuhan ekonomi nasional.

Based on the evaluation results, we appreciate the performance shown by the Board of Directors in optimizing the achievement of previously set targets. From operational aspect, Bank Victoria's total deposits recorded a growth of 15.78%, indicating success in expanding fund base, a very important aspect for the Bank's operational activities. Furthermore, credit achievement which recorded growth of 17.72% showed Bank Victoria's commitment to supporting financing for various economic sectors, one indicator of success in supporting the national economic growth.

Kinerja ini juga memungkinkan capaian profitabilitas Bank Victoria terjaga dengan baik, terutama melalui perolehan pertumbuhan pendapatan bunga sebesar 7,71%. Hal ini mencerminkan keberhasilan Direksi dalam mengelola aset-aset bank dengan efisien serta menjaga stabilitas keuangan Bank Victoria. Namun demikian, kami juga memahami bahwa volatilitas pasar keuangan serta tren kenaikan suku bunga yang terjadi sepanjang tahun 2023 turut memengaruhi kinerja Bank Victoria, terutama terkait dengan penurunan capaian laba bersih. Kami percaya bahwa Direksi telah mengambil langkah-langkah yang tepat dalam menghadapi tantangan ini, dan kami optimis bahwa dengan strategi yang tepat, Bank Victoria akan terus berkembang dan memberikan nilai tambah bagi seluruh pemangku kepentingan ke depan.

This performance also enabled Bank Victoria's profitability to be properly maintained, particularly through interest income growth of 7.71%. This reflects the success of the Board of Directors in managing Bank assets efficiently and maintaining Bank Victoria's financial stability. Nonetheless, we also understood that financial market volatility and the trend of increasing interest rates that occurred throughout 2023 also affected Bank Victoria's performance, particularly in relation to the decline in net profit. We believe that the Board of Directors has taken appropriate steps in facing this challenge, and we are optimistic that with the appropriate strategy, Bank Victoria will continue to grow and provide added value for all stakeholders in the future.

Hasil dari penilaian kinerja Direksi kemudian akan menjadi dasar bagi Dewan Komisaris untuk memberikan masukan dan rekomendasi kepada Direksi, baik untuk memperkuat keberhasilan yang telah dicapai maupun untuk meningkatkan kinerja di area-area yang perlu perbaikan. Dengan demikian, penilaian kinerja Direksi merupakan bagian integral dari upaya Dewan Komisaris dalam memastikan bahwa Bank Victoria dikelola dengan baik dan efektif sesuai dengan prinsip-prinsip tata kelola perusahaan yang baik.

The results of the Board of Directors' performance assessment will then serve as the basis for the Board of Commissioners to provide input and recommendations to the Board of Directors, both to strengthen the successes achieved and to improve performance in areas requiring improvement. Thus, assessment of the Board of Directors' performance is an integral part of the Board of Commissioners' efforts to ensure that Bank Victoria is managed properly and effectively, in accordance with the principles of good corporate governance.

Pandangan atas Prospek Usaha

Pandangan atas prospek usaha Bank Victoria menyoroti berbagai aspek yang menjadi faktor penentu dalam menghadapi masa depan. Dalam konteks ini, kami melihat Bank Victoria memiliki potensi yang besar untuk terus berkembang dan memberikan kontribusi positif bagi pemangku kepentingan. Optimisme ini didukung dengan proyeksi pertumbuhan ekonomi nasional yang stabil, dukungan pemerintah terhadap sektor keuangan, dan perubahan pola konsumsi masyarakat yang semakin cenderung digital menjadi peluang utama yang dapat dimanfaatkan. Selain itu, adopsi teknologi dalam layanan keuangan menjadi salah satu poin penting dalam meningkatkan efisiensi operasional dan memperluas jangkauan layanan kepada nasabah. Oleh karena itu, kami memandang bahwa Bank Victoria dapat memanfaatkan tren digitalisasi untuk mengembangkan produk dan layanan yang inovatif, sehingga dapat memberikan nilai tambah yang lebih besar bagi nasabah dan menciptakan diferensiasi kompetitif di pasar.

Namun, di sisi lain, Bank Victoria juga menghadapi berbagai tantangan seperti persaingan yang semakin ketat, perubahan regulasi yang dinamis serta risiko-risiko yang terkait dengan perubahan kondisi ekonomi dan pasar. Oleh karena itu, strategi yang proaktif dalam manajemen risiko, adaptasi terhadap perubahan lingkungan bisnis, serta fokus pada pelayanan berkualitas tinggi kepada nasabah menjadi kunci dalam memanfaatkan peluang-peluang yang ada dan mengatasi tantangan yang dihadapi. Dengan pandangan yang optimis namun realistis terhadap prospek usaha, Dewan Komisaris berkeyakinan Bank Victoria dapat terus berinovasi, meningkatkan daya saing, dan memperkuat posisinya sebagai salah satu pelaku bisnis dalam industri perbankan Indonesia.

Views on Business Outlook

Bank Victoria's view of business prospects highlights various aspects that determine factors in facing the future. In this context, we believe that Bank Victoria has great potential to continue to develop and make positive contributions to stakeholders. This optimism is supported by projections of stable national economic growth, government support for financial sector, and changes in people's consumption patterns which increasingly tend to be digital, becoming the main opportunity to be utilized. Apart from that, the adoption of technology in financial services is an important point in increasing operational efficiency and expanding the reach of services to customers. Therefore, we observe that Bank Victoria can take advantage of the digitalization trend to develop innovative products and services, so as to provide greater added value for customers and create competitive differentiation in the market.

However, on the other side, Bank Victoria also needs to face various challenges, such as increasingly fierce competition, dynamic regulatory changes, and risks related to changes in economic and market conditions. Therefore, proactive strategies in risk management, adaptation to changes in business environment, and focus on high-quality services to customers are keys to utilizing existing opportunities and overcoming the encountered challenges. With an optimistic but realistic view of business prospects, the Board of Commissioners believes that Bank Victoria can continue to innovate, increase competitiveness, and strengthen its position as one of business players in Indonesian banking industry.

Pandangan atas Penerapan Tata Kelola Perusahaan yang Baik

Penerapan tata kelola perusahaan yang baik (*good corporate governance*/GCG) merupakan fondasi yang kuat dalam menjaga integritas, kepercayaan, dan keberlanjutan Bank Victoria. Kami juga memandang bahwa GCG bukan hanya sekadar kepatuhan terhadap regulasi dan standar yang berlaku, tetapi juga mencakup nilai-nilai etika, transparansi, dan akuntabilitas yang tinggi dalam setiap aspek pengelolaan Bank Victoria. Oleh karena itu, kami menekankan pentingnya menerapkan prinsip-prinsip GCG secara menyeluruh dalam setiap keputusan dan tindakan yang diambil oleh Bank Victoria. Hal ini termasuk dalam proses pengambilan keputusan strategis, pengelolaan risiko, penerapan GCG, serta hubungan dengan pemangku kepentingan. Kami percaya bahwa dengan menerapkan GCG secara konsisten, Bank Victoria dapat memperkuat reputasi sebagai entitas yang bertanggung jawab, profesional, dan dapat dipercaya di mata pasar, Pemegang Saham, dan masyarakat secara luas. Selain itu, penerapan GCG yang baik juga akan membantu Bank Victoria dalam menghadapi tantangan-tantangan yang kompleks di lingkungan bisnis yang dinamis dan bersaing secara sehat dalam industri perbankan.

Views on the Implementation of Good Corporate Governance

The implementation of good corporate governance (GCG) is a strong foundation in maintaining integrity, trust, and sustainability of Bank Victoria. We also observe that GCG is not only a compliance with applicable regulations and standards, but also includes high ethical values, transparency, and accountability in each Bank Victoria's management aspect. Therefore, we emphasize the importance of implementing GCG principles thoroughly in every decision and action taken by Bank Victoria. This includes the strategic decision making process, risk management, GCG implementation, and relationships with stakeholders. We believe that by consistently implementing GCG, Bank Victoria can strengthen its reputation as a responsible, professional, and trustworthy entity in the eyes of the market, shareholders and society at large. Furthermore, implementing good GCG will also help Bank Victoria face complex challenges in a dynamic business environment and compete fairly in the banking industry.

Berdasarkan pandangan Dewan Komisaris atas penerapan GCG yang telah dijalankan sepanjang tahun 2023, kami melihat bahwa upaya-upaya dalam menjaga sekaligus meningkatkan kualitas penerapan GCG secara keseluruhan di Bank Victoria telah semakin baik. Langkah-langkah konkret yang telah diambil termasuk peningkatan pengawasan terhadap proses pengambilan keputusan, pelaksanaan praktik-praktik bisnis yang beretika, serta peningkatan komunikasi dan keterbukaan kepada pemangku kepentingan. Selain itu, kami juga melihat adanya komitmen yang kuat dari Direksi dalam mematuhi standar GCG yang berlaku, baik itu dalam hal pelaporan keuangan yang transparan maupun dalam menjaga independensi dan objektivitas dalam pengambilan keputusan. Meskipun demikian, kami juga menyadari bahwa masih terdapat ruang untuk perbaikan dan peningkatan dalam beberapa aspek tertentu. Dengan demikian, kami berkomitmen untuk turut berperan aktif dalam meningkatkan kualitas penerapan GCG di Bank Victoria dengan memperhatikan rekomendasi dan masukan yang diberikan oleh pihak-pihak terkait, serta melalui evaluasi dan perbaikan terus-menerus dalam proses GCG.

Based on the Board of Commissioners' views on the implementation of GCG throughout 2023, we see that efforts to maintain and improve the overall quality of GCG implementation at Bank Victoria have improved. The concrete steps taken include increasing supervision of decision-making process, implementing ethical business practices, and increasing communication and openness to stakeholders. Apart from that, we also see a strong commitment from the Board of Directors in complying with applicable GCG standards, both in terms of transparent financial reporting and maintaining independence and objectivity in decision making. However, we also realize that there is still room for improvement and enhancement in certain aspects. Thus, we are committed to playing an active role in improving the quality of GCG implementation at Bank Victoria by paying attention to recommendations and input provided by related parties, and through continuous evaluation and improvement in the GCG process.

Pandangan atas Penerapan Tanggung Jawab Sosial dan Lingkungan

Tanggung jawab sosial dan lingkungan menjadi hal yang penting dalam menjaga harmoni antara pertumbuhan bisnis dengan dampak positif terhadap masyarakat dan lingkungan sekitar. Kami percaya bahwa sebagai entitas korporasi, Bank Victoria memiliki tanggung jawab moral dan etis untuk berkontribusi positif dalam membangun masyarakat yang lebih berkelanjutan dan sejahtera. Dalam konteks ini, kami telah mengamati langkah-langkah yang diambil oleh Bank Victoria dalam menerapkan tanggung jawab sosial dan lingkungan. Langkah-langkah tersebut meliputi program-program CSR yang berfokus pada perbaikan sarana dan prasarana sosial, pemberian donasi, serta praktik-praktik bisnis yang memperhatikan dampak lingkungan. Kami juga mengapresiasi komitmen Bank Victoria dalam menyalurkan pembiayaan kepada debitur-debitur yang senantiasa memperhatikan kelestarian lingkungan dalam kegiatan operasionalnya.

Selain itu, kami juga melihat bahwa Bank Victoria telah memperhatikan aspek lingkungan dalam kegiatan operasional dengan mengimplementasikan praktik-praktik yang ramah lingkungan dan berkelanjutan, seperti penggunaan sumber daya yang bertanggung jawab, pengelolaan limbah yang efisien, serta dukungan terhadap program-program penghijauan di sekitar area operasional. Meskipun demikian, kami tetap memandang bahwa masih terdapat ruang untuk perbaikan dan peningkatan dalam penerapan tanggung jawab sosial dan lingkungan. Kami mendorong Bank Victoria untuk terus meningkatkan program-program CSR yang berdampak langsung bagi masyarakat, serta memperkuat praktik-praktik berkelanjutan dalam kegiatan operasional perbankan. Dengan demikian, Bank Victoria dapat memberikan kontribusi yang lebih besar dan berkelanjutan dalam menciptakan nilai positif bagi masyarakat dan lingkungan sekitar.

Views on the Implementation of Social and Environmental Responsibility

Social and environmental responsibility is an important matter in maintaining harmony between business growth and positive impacts on community and surrounding environment. We believe that as a corporate entity, Bank Victoria has a moral and ethical responsibility to contribute positively to building a more sustainable and prosperous community. In this context, we have observed the steps taken by Bank Victoria in implementing social and environmental responsibility. Such steps include CSR programs that focus on improving community facilities and infrastructure, providing donations, and business practices with due observance of environmental impacts. We also appreciate Bank Victoria's commitment to channeling financing to debtors who always pay attention to environmental sustainability in their operational activities.

Furthermore, we also review that Bank Victoria has paid attention to environmental aspects in operational activities by implementing environmentally friendly and sustainable practices, such as responsible use of resources, efficient waste management, and support for greening programs around the operational area. Nevertheless, we still believe that there is still room for improvement and enhancement in the implementation of social and environmental responsibility. We encourage Bank Victoria to continuously improve CSR programs with direct impact on community and strengthen sustainable practices in banking operational activities. In this way, Bank Victoria can make greater and more sustainable contribution in establishing positive value for the community and the surrounding environment.

Perubahan Komposisi Anggota Dewan Komisaris

Sepanjang tahun 2023, tidak terdapat perubahan terkait komposisi anggota Dewan Komisaris Bank Victoria. Komposisi Dewan Komisaris yang menjabat saat ini meliputi:

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

Changes in the Board of Commissioners' Composition

Throughout 2023, there were no changes to the composition of the Board of Commissioners of Bank Victoria. The current composition of the Board of Commissioners includes:

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

Penutup

Menutup penyampaian laporan ini, saya atas nama Dewan Komisaris Bank Victoria menyampaikan apresiasi dan terima kasih yang tulus kepada Direksi atas kepemimpinan yang kuat dan visi strategisnya yang telah membimbing perjalanan sukses Bank Victoria.

Apresiasi dan terima kasih juga diberikan kepada Pemegang Saham atas dukungan yang telah diberikan, baik dalam bentuk investasi maupun kepercayaan yang terus dipertahankan, sehingga menjadi fondasi yang kokoh bagi Bank Victoria untuk terus tumbuh dan berkembang di tengah dinamika pasar yang kompetitif.

Ucapan terima kasih juga kami sampaikan kepada Nasabah yang telah memilih Bank Victoria sebagai mitra keuangan, Regulator atas bimbingan yang berharga dalam menjalankan operasional Bank Victoria dengan baik dan sesuai regulasi, serta kepada pemangku kepentingan lainnya yang telah memberikan dukungan dan kerja sama yang berarti bagi kemajuan Bank Victoria.

Semoga kerja sama yang telah terjalin dapat terus ditingkatkan dan menghasilkan nilai tambah yang berkelanjutan bagi seluruh pihak terkait. Dengan sinergi yang kuat, Bank Victoria dapat terus berkembang dalam persaingan industri perbankan yang bertanggung jawab, profesional, dan memberikan dampak positif bagi masyarakat dan lingkungan sekitar.

Closing

Concluding the submission of this report, I, on behalf of the Board of Commissioners of Bank Victoria, would like to express our sincere appreciation and gratitude to the Board of Directors for their strong leadership and strategic vision that have guided Bank Victoria's successful journey.

Appreciation and thanks are also expressed to the Shareholders for their supports, both in the form of investment and continued trust, thus providing a solid foundation for Bank Victoria to continue to grow and develop amidst competitive market dynamics.

We also would like to express our gratitude to the customers who have chosen Bank Victoria as their financial partner, to the regulators for their valuable guidance in performing Bank Victoria's operations properly and according to regulations, and to other stakeholders who have provided meaningful support and cooperation for the progress of Bank Victoria.

We hope the established cooperation can continue to be improved and produce sustainable added value for all related parties. With strong synergy, Bank Victoria can continue to develop, in a competitive banking industry, to become a Bank that is responsible, professional, and having positive impact on community and the surrounding environment.

Jakarta, April 2024

Atas nama Dewan Komisaris PT Bank Victoria International Tbk
On behalf of the Board of Commissioners of PT Bank Victoria International Tbk



Zaenal Abidin Ph.D

Komisaris Utama Independen
Independent President Commissioner

Dewan Komisaris
Board of Commissioners



3 1 2

1. **Zaenal Abidin Ph.D**
   Komisaris Utama Independen
   President Commissioner Independent

2. **Gunawan Tenggarahardja**
   Komisaris/Komisaris Independen
   Commissioner/Independent Commissioner

3. **Sia Leng Ho**
   Komisaris
   Commissioner

Laporan Direksi

Board of Directors' Report

ACHMAD FRISCANTONO
Direktur Utama
President Director

Pemegang Saham dan Pemangku Kepentingan yang Terhormat,

Dear Honorable Shareholders and Stakeholders,

Puji dan syukur kami panjatkan kepada Tuhan Yang Maha Esa atas pencapaian dan kinerja membanggakan yang telah diraih Bank Victoria selama tahun 2023. Merupakan suatu kehormatan bagi kami, mewakili Direksi Bank Victoria menyampaikan laporan kinerja Bank untuk tahun buku 2023. Di tengah berbagai tantangan dan dinamika, Bank Victoria terus berupaya untuk mempertahankan keunggulan-keunggulan kompetitif yang dimiliki dalam rangka meningkatkan daya saing sebagai salah satu pelaku utama dalam industri perbankan yang bertanggung jawab, profesional, dan memberikan nilai tambah yang berkelanjutan bagi semua pemangku kepentingan. Melalui laporan ini, kami ingin menggambarkan perjalanan yang telah kami lalui, mencatat pencapaian yang diraih, serta menguraikan strategi yang telah kami rancang untuk memastikan pertumbuhan berkelanjutan Bank Victoria.

Let us send praise and express gratitude to the God Almighty for the proud achievements and performance achieved by Bank Victoria throughout 2023. It is an honor for us, representing the Board of Directors of Bank Victoria to present the Bank's performance report for the 2023 fiscal year. In the midst of various challenges and dynamics, Bank Victoria strives to maintain its competitive advantages to increase its competitiveness as one main player in banking industry that is responsible, professional, and provides sustainable added value for all stakeholders. Through this report, we would like to describe the journey we have gone through, record the achievements achieved, and outline the strategies designed to ensure sustainable growth of Bank Victoria.



Tantangan Ekonomi dan Industri Perbankan Tahun 2023

Perkembangan perekonomian global tahun 2023 kembali dihadapkan pada berbagai tantangan dan dinamika yang mempengaruhi pelambatan pertumbuhan ekonomi global. Ketidakpastian geopolitik, seperti perang Rusia di Ukraina maupun ketegangan perdagangan antara Amerika Serikat dan Tiongkok, menjadi faktor utama yang menghambat laju pertumbuhan ekonomi global. Selain itu, dinamika ekonomi global juga dipengaruhi oleh peningkatan ketidakpastian pasar keuangan, fluktuasi harga komoditas, dan ketidakseimbangan ekonomi antarnegara. Disparitas pertumbuhan ekonomi yang semakin melebar juga menjadi perhatian utama dalam perekonomian

Economic Challenges and Banking Industry in 2023

The development of the global economy in 2023 was faced with various challenges and dynamics that influenced the slowdown in global economic growth. Geopolitical uncertainties, such as Russia's war in Ukraine and trade tensions between the United States and China, were major factors hampering the rate of global economic growth. Furthermore, global economic dynamics were also affected by increased financial market uncertainty, commodity price fluctuations, and economic imbalances between countries. The widening disparity in economic growth was also a major concern in the global economy. Some developed countries managed to maintain stable economic growth, while

global. Beberapa negara maju berhasil mempertahankan pertumbuhan ekonomi yang stabil, sementara ekonomi-ekonomi negara berkembang menghadapi tantangan yang lebih signifikan, terutama dalam menjaga stabilitas mata uang dan mengendalikan tingkat inflasi. Hal ini menunjukkan kompleksitas dalam dinamika perekonomian global yang membutuhkan upaya kolaboratif untuk mengatasi masalah yang dihadapi dan menjaga stabilitas ekonomi secara keseluruhan.

Di tengah tantangan perekonomian global, perekonomian Indonesia tahun 2023 terus menunjukkan kestabilan dan daya tahan dengan mencatatkan pertumbuhan sebesar 5,04%. Hal ini menunjukkan bahwa kebijakan-kebijakan ekonomi yang diterapkan oleh pemerintah, bersama dengan stabilitas keuangan dan kepercayaan investor yang terjaga, memberikan fondasi yang kuat bagi pertumbuhan ekonomi yang berkelanjutan di Indonesia. Kontribusi sektor-sektor kunci seperti sektor jasa yang dinamis, industri yang terus berinovasi, dan pertanian yang semakin produktif, turut memperkuat kinerja ekonomi nasional. Tidak hanya itu, inflasi yang tetap terjaga pada tingkat yang moderat juga menjadi faktor penting dalam menjaga stabilitas ekonomi Indonesia, memperkuat daya beli masyarakat, dan mendorong investasi yang berkelanjutan. Capaian ini mendorong berbagai sektor industri nasional mencatatkan kinerja yang kondusif, termasuk sektor keuangan.

Di sektor keuangan, industri perbankan Indonesia menunjukkan ketahanan yang baik meskipun dalam situasi ekonomi yang menantang. Pertumbuhan kredit perbankan kepada pihak ketiga tercatat 10,38%, menunjukkan bahwa sektor keuangan mampu terus mendukung aktivitas ekonomi dan memainkan peran penting dalam mendorong pertumbuhan. Selain itu, Dana Pihak Ketiga (DPK) juga mencatatkan pertumbuhan sebesar 3,73%, mengindikasikan bahwa likuiditas sektor perbankan tetap terjaga dengan baik. Upaya pengembangan inovasi produk dan layanan perbankan juga turut berkontribusi dalam memperluas akses keuangan dan meningkatkan inklusi keuangan di berbagai lapisan masyarakat. Dalam menghadapi dinamika ekonomi yang berubah-ubah, industri perbankan tetap fokus pada upaya meningkatkan efisiensi operasional dan mengelola risiko dengan lebih efektif. Hal ini tidak terlepas dari upaya untuk menjaga stabilitas dan pertumbuhan industri perbankan secara keseluruhan, sekaligus memastikan bahwa sektor ini tetap menjadi pendorong utama dalam mendukung pertumbuhan ekonomi Indonesia.

Kebijakan dan Strategi Keberlanjutan yang Ditempuh Bank Victoria

Menghadapi tantangan serta peluang yang berkembang sepanjang tahun 2023, Bank Victoria telah mengadopsi kebijakan dan strategi yang bertujuan untuk memperkuat daya saing di pasar dan memenuhi kebutuhan serta harapan pelanggan. Dari segi

emerging economies encountered more significant challenges, particularly in maintaining currency stability and controlling inflation levels. Such matters showed the complexity in global economic dynamics requiring collaborative efforts to overcome the issues and maintain overall economic stability.

Amidst global economic challenges, the Indonesian economy in 2023 continued to show stability and resilience by recording a growth of 5.04%. This showed that economic policies, implemented by the government together with financial stability and maintained investor confidence, provided a strong foundation for sustainable economic growth in Indonesia. The contribution of key sectors, such as sectors of service that was dynamic, industry that continued to innovate, and agriculture that was increasingly productive, also strengthened the national economic performance. Not only that, inflation that was maintained at moderate level was also an important factor in maintaining Indonesia's economic stability, strengthening people's purchasing power, and encouraging sustainable investment. This achievement encouraged various national industrial sectors to record conducive performance, including the financial sector.

In financial sector, Indonesian banking industry demonstrated good resilience despite the challenging economic situation. Banking loans to third parties was recorded increasing by 10.38%, indicating that financial sector continued to support economic activity and played an important role in driving growth. Furthermore, Third Party Funds (DPK) also recorded a growth of 3.73%, indicating that banking sector liquidity remained well maintained. Efforts to develop innovative banking products and services also contributed to expanding financial access and increasing financial inclusion at various levels of community. In facing changing economic dynamics, banking industry kept focus on improving operational efficiency and managing risk more effectively. This was inseparable from efforts to maintain the stability and growth of banking industry as a whole, while ensuring that this sector remained the main driver in supporting Indonesia's economic growth.

Policies and Sustainability Strategies Taken by Bank Victoria

Facing growing challenges and opportunities throughout 2023, Bank Victoria adopted policies and strategies aimed at strengthening competitiveness in the market and meeting customer needs and expectations. From operational perspective,

operasional, Bank Victoria memprioritaskan strategi pendanaan sebagai langkah strategi dalam menjaga dan meningkatkan loyalitas nasabah. Bank Victoria berharap menjadi Bank pilihan nasabah yang dipercaya, sehat, efisien, dan mendukung pertumbuhan berkelanjutan dengan mengedepankan kebutuhan nasabah, mengembangkan sumber daya manusia, menjalankan operasional perbankan dengan menerapkan prinsip kehati-hatian, serta mengimplementasikan proses manajemen risiko sesuai visi dan misi Bank.

Bank Victoria prioritizes funding strategies as a strategic step in maintaining and increasing customer loyalty. Bank Victoria expects to be customers' preferred Bank that is trusted, healthy, efficient, and supporting sustainable growth by prioritizing customer needs, developing human resources, carrying out banking operations by applying prudential principle, and implementing risk management processes in accordance with the Bank's vision and mission.

Di sisi lain, strategi bidang perkreditan diprioritaskan pada upaya menjaga dan meningkatkan kualitas kredit dengan target pertumbuhan yang sehat dan berkesinambungan. Bank Victoria senantiasa memperhatikan kualitas portofolio kredit, termasuk pemilihan nasabah yang cermat dan pengelolaan risiko yang efektif. Dengan demikian, Bank Victoria dapat meminimalkan risiko kredit dan memastikan bahwa pertumbuhan kredit yang dicapai adalah berkelanjutan dan memberikan kontribusi positif terhadap hasil kinerja keuangan Bank.

On the other hand, credit sector strategy prioritizes efforts to maintain and improve credit quality with a target of healthy and sustainable growth. Bank Victoria always pays attention to the quality of its credit portfolio, including careful customer selection and effective risk management. In this way, Bank Victoria can minimize credit risk and ensure that the credit growth achieved is sustainable and makes a positive contribution to the Bank's financial results.

Selain itu, Bank Victoria juga melakukan pengembangan secara berkelanjutan dalam *revamping* terhadap *internet banking* dan *mobile banking*. Langkah ini direalisasikan melalui pengembangan fitur-fitur yang unggul dan aman, sehingga memberikan kemudahan akses dan pengalaman bertransaksi yang lancar dan efisien bagi nasabah. Dengan terus meningkatkan teknologi informasi, Bank Victoria dapat memastikan bahwa ketersediaan produk dan layanan yang terbaik untuk nasabah sekaligus tetap menjaga keamanan dan kenyamanan nasabah bertransaksi perbankan. Investasi dalam teknologi informasi menjadi salah satu prioritas utama Bank Victoria untuk memastikan bahwa teknologi informasi yang dimiliki selalu siap menghadapi tuntutan pasar yang terus berkembang, sambil memastikan bahwa data dan transaksi nasabah tetap terlindungi dengan baik. Dengan demikian, Bank Victoria dapat tetap kompetitif dan responsif terhadap perubahan lingkungan bisnis yang dinamis.

Furthermore, Bank Victoria also carries out continuous development in revamping internet banking and mobile banking. This step is realized through the development of excellent and secure features, thereby providing easy access and smooth and efficient transaction experience for customers. By continuing to improve information technology, Bank Victoria ensures the availability of the best products and services for customers while maintaining customer security and comfort in banking transactions. Investment in information technology is one of Bank Victoria's main priorities to ensure that its information technology is always ready to face the ever-growing market demands, while ensuring that customer data and transactions are well protected. In this way, Bank Victoria can remain competitive and responsive to changes in the dynamic business environment.

Peranan Direksi dalam Perumusan dan Implementasi Strategi Keberlanjutan

Peranan Direksi dalam perumusan dan implementasi strategi merupakan fondasi utama yang mengarahkan Bank Victoria untuk mencapai target-target kinerja maupun visi jangka panjang. Direksi bertanggung jawab atas pembuatan keputusan strategis yang mendasar, termasuk penetapan tujuan jangka panjang, pengambilan risiko yang terkontrol, dan pengembangan inisiatif-inisiatif dalam rangka mencapai visi dan misi Bank Victoria. Selain itu, Direksi juga berperan dalam memastikan bahwa strategi yang dirumuskan sesuai dengan nilai-nilai perusahaan dan memperhatikan faktor-faktor eksternal yang memengaruhi kinerja bisnis. Selain perumusan strategi, Direksi juga memiliki tanggung jawab yang besar dalam implementasi strategi. Direksi

Board of Directors' Role in Formulation and Implementation of Sustainability Strategy

The Board of Directors' role in formulating and implementing strategy is the main foundation that directs Bank Victoria to achieve performance targets and long-term vision. The Board of Directors is responsible for making fundamental strategic decisions, including setting long-term goals, taking controlled risks, and developing initiatives in order to achieve Bank Victoria's vision and mission. Furthermore, the Board of Directors also plays a role in ensuring that the strategies formulated are in line with the Company's values and considering external factors that influence business performance. Apart from formulating strategy, the Board of Directors also has a large responsibility in implementing strategy. The Board of Directors always ensures

senantiasa memastikan bahwa rencana strategis dijalankan dengan efektif dan efisien di seluruh unit bisnis Bank Victoria. Hal ini melibatkan pengawasan yang cermat terhadap pelaksanaan rencana, alokasi sumber daya yang tepat, dan evaluasi terus-menerus terhadap kinerja untuk memastikan pencapaian tujuan yang telah ditetapkan.

Peranan Direksi tidak hanya berfokus pada tahap perumusan dan implementasi strategi. Direksi juga senantiasa memastikan adanya mekanisme pengukuran kinerja yang jelas dan transparan, serta melakukan koreksi dan penyesuaian strategis jika diperlukan untuk menghadapi perubahan kondisi pasar dan lingkungan bisnis yang dinamis. Direksi bertanggung jawab untuk menetapkan indikator kinerja yang terukur dan dapat dinilai secara objektif, sehingga memungkinkan evaluasi yang komprehensif terhadap pencapaian tujuan strategis Bank Victoria. Selain itu, Direksi juga memiliki tanggung jawab untuk melakukan koreksi dan penyesuaian strategis jika diperlukan, agar Bank Victoria dapat tetap responsif terhadap perubahan kondisi pasar dan lingkungan bisnis yang dinamis.

Pencapaian Target dan Kinerja Keberlanjutan Bank Victoria

Efektivitas implementasi strategi keberlanjutan yang dijalankan Direksi memungkinkan Bank Victoria mampu memperoleh pencapaian yang mengesankan dalam berbagai aspek, sehingga menegaskan posisi sebagai lembaga keuangan yang berkinerja baik dan berkelanjutan. Pencapaian target dan kinerja keberlanjutan Bank Victoria tercermin dalam berbagai indikator yang menunjukkan pertumbuhan yang sehat, kepatuhan terhadap regulasi, serta kontribusi positif terhadap masyarakat dan lingkungan. Dalam hal pertumbuhan, kinerja penghimpunan Bank Victoria juga menunjukkan tren positif, dengan pertumbuhan yang stabil dan berkelanjutan seiring dengan strategi penghimpunan dana yang efektif dan kepercayaan nasabah yang terjaga. Pada tahun 2023, total simpanan tercatat sebesar Rp22,43 triliun, meningkat sebesar 15,78% dibandingkan tahun 2022 sebesar Rp19,37 triliun. Selain itu, Bank Victoria juga berhasil mencapai target penyaluran dana yang sehat dan berkelanjutan, dengan pertumbuhan kredit yang diimbangi oleh peningkatan kualitas portofolio kredit. Sepanjang tahun 2023, Bank Victoria menyalurkan total kredit sebesar Rp18,63 triliun, meningkat sebesar 17,72% dibandingkan tahun 2022 sebesar Rp15,82 triliun.

Bank Victoria juga mencatat pertumbuhan yang positif pada total aset sebesar 14,24%, liabilitas sebesar 16,05%, dan ekuitas sebesar 3,36%, mencerminkan stabilitas dan pertumbuhan yang seimbang dalam operasional bank. Pendapatan bunga juga menunjukkan peningkatan yang positif, mencerminkan efektivitas strategi pengembangan bisnis dan diversifikasi produk

that strategic plans are implemented effectively and efficiently in all Bank Victoria business units. This involves careful monitoring of plan implementation, appropriate allocation of resources, and continuous evaluation of performance to ensure the achievement of the predetermined objectives.

The role of the Board of Directors does not only focus on strategy formulation and implementation phase. The Board of Directors also always ensures that there is a clear and transparent performance measurement mechanism, and makes strategic corrections and adjustments, if necessary, to face changes in market conditions and dynamic business environment. The Board of Directors is in charge of establishing performance indicators that are measurable and can be assessed objectively, thereby enabling a comprehensive evaluation of the achievement of Bank Victoria's strategic objectives. In addition, the Board of Directors is also in charge of making strategic corrections and adjustments, if necessary, so as Bank Victoria can remain responsive to changes in market conditions and dynamic business environment.

Target Achievement and Sustainability Performance of Bank Victoria

The effectiveness of sustainability strategy implemented by the Board of Directors has enabled Bank Victoria to achieve impressive achievements in various aspects, thereby confirming its position as a well-performing and sustainable financial institution. Bank Victoria's target achievement of sustainability performance are reflected in various healthy growth indicators, compliance with regulations, and positive contributions to the community and environment. In terms of growth, Bank Victoria's collection performance also shows a positive trend, with stable and sustainable growth in line with effective fund collection strategy and maintained customer trust. In 2023, the total deposits were recorded at Rp22.43 trillion, an increase of 15.78% compared to Rp19.37 trillion in 2022. Furthermore, Bank Victoria also managed to achieve healthy and sustainable lending target, with credit growth balanced by an increase in the quality of credit portfolio. Throughout 2023, Bank Victoria disbursed total loans of Rp18.63 trillion, an increase of 17.72% compared to Rp15.82 trillion in 2022.

Bank Victoria also recorded positive growth in total assets of 14.24%, liabilities of 16.05%, and equity of 3.36%, reflecting stability and balanced growth in the Bank's operations. Bank Victoria's interest income also showed a positive increase, reflecting the effectiveness of the Bank's business development and product diversification strategies. Nevertheless, the increase

yang dilakukan Bank. Meskipun demikian, peningkatan suku bunga berpengaruh pada peningkatan beban bunga sehingga menekan capaian laba bersih. Meski menghadapi tantangan ini, Bank Victoria tetap memberikan komitmen yang kuat terhadap keberlanjutan dan kinerja yang berkualitas, dengan terus mengoptimalkan strategi bisnis dan pengelolaan risiko secara efektif.

Komitmen Bank Victoria akan Penerapan Keuangan Berkelanjutan

Sejalan dengan itu, penerapan keuangan berkelanjutan dalam lingkup bisnis Bank Victoria juga terus dikembangkan sesuai dengan *roadmap* dalam Rencana Aksi Keuangan Berkelanjutan (RAKB) 2023-2027. Pada tahun 2023, fokus dari aksi keuangan berkelanjutan Bank Victoria, meliputi penguatan kapasitas internal Bank Victoria, penyesuaian peraturan internal, pengembangan bisnis yang mendukung prinsip keuangan berkelanjutan, serta pemberian dukungan yang komprehensif pada inisiatif keuangan berkelanjutan. Terkait dengan hal ini, Bank Victoria telah menyalurkan produk pembiayaan kepada debitur yang sesuai dengan kriteria kegiatan usaha berkelanjutan, sejalan dengan tujuan Pembangunan Berkelanjutan (SDGs). Langkah-langkah ini menunjukkan keseriusan Bank Victoria dalam mendukung praktik keuangan yang ramah lingkungan dan sosial, serta mendukung visi dan misi pembangunan berkelanjutan secara menyeluruh.

Dengan RAKB sebagai landasan strategis, Bank Victoria bertekad untuk terus meningkatkan kinerja keuangan yang berkelanjutan serta memperluas dampak positif terhadap lingkungan dan masyarakat. Evaluasi dan pemantauan terus-menerus dilakukan untuk memastikan bahwa implementasi RAKB berjalan sesuai dengan rencana dan memberikan kontribusi terhadap pencapaian tujuan keuangan berkelanjutan. Bank Victoria juga berkomitmen untuk terus berinovasi dalam produk dan layanan keuangan yang mendukung praktik berkelanjutan, sehingga dapat memberikan nilai tambah yang berkelanjutan bagi nasabah, pemangku kepentingan, dan komunitas secara luas.

Penerapan Tata Kelola Perusahaan yang Baik

Penerapan GCG merupakan suatu komitmen yang tak terpisahkan dari Bank Victoria. Bank Victoria percaya bahwa GCG bukan hanya sekadar kewajiban hukum, tetapi juga fondasi yang kokoh untuk menciptakan nilai jangka panjang bagi Bank Victoria dan seluruh pemangku kepentingan. Dengan mengintegrasikan prinsip-prinsip GCG secara komprehensif, Bank Victoria memastikan bahwa semua lini bisnis dan operasional senantiasa mengedepankan perilaku beretika, akuntabilitas, transparansi, dan keberlanjutan. Prinsip-prinsip GCG yang diterapkan oleh Bank Victoria tersebut

in interest rates affected the increasing interest expense, suppressing the net income. Despite facing such challenges, Bank Victoria continues to provide a strong commitment to sustainability and quality performance, by continuing to optimize business strategies and manage risks effectively.

Bank Victoria's Commitment to Implementing Sustainable Finance

In line with the matters, the implementation of sustainable finance within Bank Victoria's business scope also continues to be developed in accordance with the roadmap in the Sustainable Finance Action Plan (RAKB) for 2023-2027. In 2023, the focus of Bank Victoria's sustainable finance actions included strengthening Bank Victoria's internal capacity, adjusting internal regulations, developing businesses that supported sustainable finance principles, and providing comprehensive support for sustainable finance initiatives. In this regard, Bank Victoria distributed financing products to debtors that complied with the criteria for sustainable business activities, in line with the Sustainable Development Goals (SDGs). These steps demonstrate Bank Victoria's seriousness in supporting environmentally and socially friendly financial practices and supporting the overall vision and mission of sustainable development.

With RAKB as a strategic basis, Bank Victoria is determined to continue to improve sustainable financial performance and expand positive impacts on environment and community. Continuous evaluation and monitoring are carried out to ensure that the RAKB implementation is in accordance with the plan and contributes to achieving the sustainable financial goals. Bank Victoria is also committed to continuing to innovate in financial products and services that support sustainable practices, so that they can provide sustainable added value for customers, stakeholders, and the community at large.

Implementation of Good Corporate Governance

GCG implementation is an inseparable commitment of Bank Victoria. Bank Victoria believes that GCG is not only a legal obligation, but also a solid basis for establishing long-term value for Bank Victoria and all stakeholders. By comprehensively integrating GCG principles, Bank Victoria ensures that all business and operational lines always prioritize ethical behavior, accountability, transparency, and sustainability. The GCG principles implemented by Bank Victoria are also supported by the presence of governance organs, such as the Board of

juga didukung oleh keberadaan organ tata kelola, seperti Dewan Komisaris, Direksi, dan komite-komite yang sesuai dengan regulasi dan praktik terbaik industri perbankan serta memiliki kompetensi yang terbaik dan relevan pada bidangnya masing-masing.

Komitmen yang kuat dari Bank Victoria terhadap penerapan GCG juga diimbangi dengan evaluasi rutin dalam rangka meningkatkan kualitas penerapan GCG secara berkesinambungan. Setiap tahun, Bank Victoria melaksanakan *self-assessment* GCG untuk menilai sejauh mana implementasi GCG sesuai dengan standar dan praktik terbaik di industri perbankan. Hasil evaluasi tersebut menjadi dasar untuk mengidentifikasi potensi kesenjangan dalam Penerapan GCG dan mengambil langkah perbaikan yang diperlukan. Berdasarkan hasil *self assessment* yg dilakukan, Bank Victoria terus berfokus pada peningkatan *governance structure, governance process*, dan *governance outcome* pada 11 aspek Penilaian GCG, yang saat ini mulai dikembangkan menjadi 16 aspek penilaian, berdasarkan Peraturan Otoritas Jasa Keuangan GCG terbaru, yaitu Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023. Hal ini meliputi pembentukan komite-komite yang bertugas mengawasi berbagai aspek GCG, pelatihan dan pengembangan kompetensi berkesinambungan kepada anggota Direksi dan karyawan.

Bank Victoria juga terus mengembangkan sistem pengendalian internal dan manajemen risiko sebagai bagian integral dari praktik GCG. Hal ini mencakup implementasi prosedur dan kebijakan yang jelas, pemantauan terhadap kepatuhan terhadap regulasi, identifikasi dan mitigasi risiko secara proaktif, serta pelaporan yang transparan kepada pemangku kepentingan. Dengan komitmen yang kuat dan upaya berkelanjutan dalam meningkatkan GCG, Bank Victoria memastikan bahwa kepentingan seluruh pemangku kepentingan terjaga dengan baik dan memberikan nilai tambah yang berkelanjutan.

Prospek Usaha Keberlanjutan Tahun 2024

Prospek usaha tahun 2024 menghadirkan sejumlah tantangan yang kompleks dan dinamis, terutama di tengah dinamika global yang masih berlanjut. Perekonomian global diprediksi akan tetap dibayangi berbagai risiko, seperti pelambatan ekonomi Tiongkok, fluktuasi harga komoditas yang komoditas yang tinggi, dan ketegangan geopolitik di beberapa wilayah dunia. Meskipun demikian, terdapat proyeksi pertumbuhan ekonomi global sebesar 2,8% pada tahun 2024, menunjukkan adanya upaya pemulihan meskipun dalam kondisi yang penuh tantangan. Di sisi lain, perekonomian Indonesia diprediksi akan tumbuh dalam kisaran 4,7%-5,5% pada tahun 2024. Hal ini didukung oleh sejumlah faktor positif, seperti meningkatnya konsumsi swasta yang terjaga, dukungan kebijakan fiskal dan moneter yang terus dilakukan, serta peran yang semakin besar dari generasi

Commissioners, Board of Directors, and committees, that comply with regulations and best practices in banking industry and have the best and relevant competencies in their respective fields.

Bank Victoria's strong commitment to GCG implementation is also balanced with routine evaluations in order to continuously improve the quality of GCG implementation. Every year, Bank Victoria carries out GCG self-assessment to assess the extent to which GCG implementation is in accordance with standards and best practices in banking industry. The evaluation results become the basis for identifying potential gaps in GCG implementation and taking necessary corrective steps. Based on the results of the self-assessment carried out, Bank Victoria continues to focus on improving the governance structure, governance process, and governance outcomes in 11 aspects of GCG Assessment, which are currently being developed into 16 assessment aspects, based on the latest Financial Services Authority Regulation on GCG, which is the Financial Services Authority Regulation No. 17 of 2023. This includes the establishment of committees in charge of overseeing various GCG aspects, continuous training and competency development for members of Board of Directors and employees.

Bank Victoria also continues to develop internal control and risk management systems as integral parts of GCG practices. This includes implementing clear procedures and policies, monitoring regulatory compliance, identifying and mitigating risk proactively, and transparent reporting to stakeholders. With strong commitments and continuous efforts to improve GCG, Bank Victoria ensures that it protects all stakeholders' interests properly and provides sustainable added value.

Sustainability Business Outlook for 2024

Business outlook for 2024 presents a number of complex and dynamic challenges, particularly amidst the ongoing global uncertainty. The global economy is predicted to remain shadowed by various risks, such as slowdown in Chinese economy, unstable fluctuations in commodity prices, and geopolitical tensions in several regions of the world. Nonetheless, the global economic is projected to grow by 2.8% in 2024, indicating that there are recovery efforts despite the challenging conditions. On the other hand, the Indonesian economy is predicted to grow in the range of 4.7%-5.5% in 2024. This is supported by a number of positive factors, such as increased private consumption, ongoing fiscal and monetary policy support, and increasing role of younger generation in supporting the economic growth. This projection shows that despite facing global pressures, the Indonesian

muda dalam mendukung pertumbuhan ekonomi. Proyeksi ini menunjukkan bahwa meskipun menghadapi tekanan global, perekonomian Indonesia memiliki potensi untuk terus membaik dan berkontribusi positif terhadap pertumbuhan regional.

economy has the potential to continuously improve and positively contribute to the regional growth.

Dari sisi industri keuangan, pelonggaran kebijakan makroprudensial yang diterapkan diproyeksikan dapat memberikan dorongan terhadap pertumbuhan kredit yang sehat, menjaga stabilitas sistem keuangan, dan memperluas inklusi ekonomi. Langkah-langkah ini diharapkan dapat menghasilkan lingkungan yang lebih kondusif bagi lembaga keuangan untuk memberikan pembiayaan yang optimal kepada berbagai sektor ekonomi, sambil tetap menjaga keseimbangan dan mitigasi risiko dalam sistem keuangan secara keseluruhan. Selain itu, pelonggaran kebijakan juga diharapkan dapat memperluas akses keuangan bagi masyarakat yang sebelumnya kurang terlayani, sehingga meningkatkan inklusi keuangan dan memberikan dorongan positif bagi pertumbuhan ekonomi yang inklusif dan berkelanjutan.

From the financial industry side, the loosening of implemented macroprudential policy is projected to trigger healthy loan growth, maintain financial system stability, and expand economic inclusion. These steps are expected to produce a more conducive environment for financial institutions to provide optimal financing to various economic sectors, while maintaining balance and mitigating risks in the financial system as a whole. Furthermore, the policy loosening is also expected to expand financial access for previously underserved communities, thereby increasing financial inclusion and positively encouraging inclusive and sustainable economic growth.

Bank Victoria menyambut baik proyeksi positif perekonomian Indonesia dan industri keuangan. Sebagaimana yang tertuang dalam Rencana Bisnis Bank untuk tahun 2024, Bank Victoria akan terus berupaya untuk memanfaatkan peluang digitalisasi yang semakin pesat untuk meningkatkan efisiensi operasional, memperluas jangkauan layanan, dan memberikan pengalaman nasabah yang lebih baik melalui inovasi di *bidang internet banking*, *mobile banking*, dan layanan keuangan digital lainnya. Selain itu, fokus pada kualitas kredit dan pengembangan produk-produk yang sesuai dengan kebutuhan nasabah juga akan menjadi strategi penting bagi Bank Victoria dalam menghadapi proyeksi industri keuangan yang dinamis tersebut. Bank Victoria menargetkan pertumbuhan kredit untuk tahun 2024 pada angka yang realistis, yang sejalan dengan perkiraan pertumbuhan ekonomi nasional. Oleh karena itu, Bank Victoria akan senantiasa melakukan penilaian menyeluruh sesuai dengan ketentuan yang berlaku dan menerapkan prinsip kehati-hatian kepada seluruh debitur serta calon debitur dalam rangka mencapai pertumbuhan yang sehat dan berkelanjutan.

Bank Victoria welcomes the positive projections for the Indonesian economy and financial industry. As stated in the Bank's Business Plan for 2024, Bank Victoria will continue to strive to take advantage of the increasingly rapid digitalization opportunities to increase operational efficiency, expand services' range, and provide better customer experience through innovation in internet banking, mobile banking, and other digital financial services. Moreover, focusing on loan quality and developing products that suit customer needs will also be important strategies for Bank Victoria in encountering the dynamic financial industry projections. Bank Victoria is targeting loan growth for 2024 at a realistic figure, in line with the national economic growth estimates. Therefore, Bank Victoria will constantly carry out comprehensive assessment according to the applicable regulations and apply prudential principles to all debtors and potential debtors in order to achieve a healthy and sustainable growth.

Perubahan Komposisi Anggota Direksi

Sepanjang tahun 2023, tidak terdapat perubahan terkait komposisi anggota Direksi Bank Victoria. Komposisi Direksi yang menjabat saat ini meliputi:

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

Changes in the Board of Directors' Composition

Throughout 2023, there were no changes to the composition of the Board of Directors of Bank Victoria. The current composition of the Board of Directors includes:

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

Penutup

Menutup penyampaian laporan ini, kami ingin menyampaikan ungkapan terima kasih dan apresiasi kepada Dewan Komisaris atas dukungan, arahan, dan pengawasan yang diberikan sepanjang tahun buku telah menjadi landasan kuat dalam menjalankan strategi yang efektif dan memastikan keberlanjutan kinerja yang baik di Bank Victoria. Selanjutnya, kami juga ingin mengungkapkan apresiasi dan terima kasih kepada seluruh karyawan atas dedikasi, kerja keras, dan komitmen yang diberikan telah menjadi pilar utama kesuksesan Bank Victoria. Kerja sama tim dan semangat untuk memberikan yang terbaik bagi nasabah adalah hal yang sangat dihargai dan diakui. Tidak lupa, kami juga menyampaikan terima kasih kepada Pemegang Saham, nasabah, regulator, dan pemangku kepentingan lainnya. Kepercayaan dan dukungan dari seluruh pemangku kepentingan menjadi motivasi dan energi positif bagi kami untuk terus berinovasi, meningkatkan layanan, dan memberikan nilai tambah yang lebih baik lagi. Dengan kerja sama yang kuat dan komitmen bersama, kami yakin Bank Victoria akan terus berkembang dan memberikan kontribusi positif bagi semua pemangku kepentingan.

Closing

Concluding the submission of this report, we would like to express our gratitude and appreciation to the Board of Commissioners for the support, direction, and supervision provided throughout the fiscal year, which has provided a strong foundation in implementing effective strategies and ensuring the continuation of good performance at Bank Victoria. Furthermore, we would also like to express our appreciation and gratitude to all employees for their dedication, hard work, and commitment that have become the main pillars of Bank Victoria's success. Teamwork and passion to provide the best for customers are matters that are highly appreciated and recognized. Also, we would like to express our gratitude to the Shareholders, customers, regulators and other stakeholders. Trust and support from all stakeholders are motivation and positive energy for us to continue to innovate, improve services, and provide even better added value. With strong cooperation and shared commitment, we are confident that Bank Victoria will continue to develop and make positive contributions to all stakeholders.

Jakarta, April 2024

Atas nama Direksi PT Bank Victoria International Tbk
On behalf of the Board of Directors of PT Bank Victoria International Tbk



Achmad Friscantono

Direktur Utama
President Director

Direksi
Board of Directors



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1. **Achmad Friscantono**
   Direktur Utama
   President Director

2. **Rusli**
   Wakil Direktur Utama
   Deputy President Director

3. **Lembing**
   Direktur Bisnis
   Director of Business

4. **Debora Wahjutirto Tanoyo**
   Direktur Keuangan
   Director of Finance

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

Tanggung Jawab Laporan Tahunan dan Keberlanjutan

Annual and Sustainability Report Responsibility

Surat Pernyataan Anggota Dewan Komisaris tentang Tanggung Jawab atas Laporan Tahunan dan Keberlanjutan 2023 PT Bank Victoria International Tbk

Statement of Members of the Board of Commissioners on the Responsibility for the 2023 Annual and Sustainability Report of PT Bank Victoria International Tbk

Kami, yang bertanda tangan di bawah ini, menyatakan bahwa semua informasi dalam Laporan Tahunan dan Keberlanjutan PT Bank Victoria International Tbk tahun 2023 telah dimuat secara lengkap dan bertanggung jawab penuh atas kebenaran isi Laporan Tahunan dan Keberlanjutan Bank.

Demikian pernyataan ini dibuat dengan sebenarnya.

We, the undersigned, hereby declare that all information in the Annual and Sustainability Report of PT Bank Victoria International Tbk for year 2023 has been fully contained and we shall be fully responsible to the correctness of contents in the Annual and Sustainability Report of the Bank.

This statement is hereby made in all truthfulness.

Jakarta, 17 April 2024

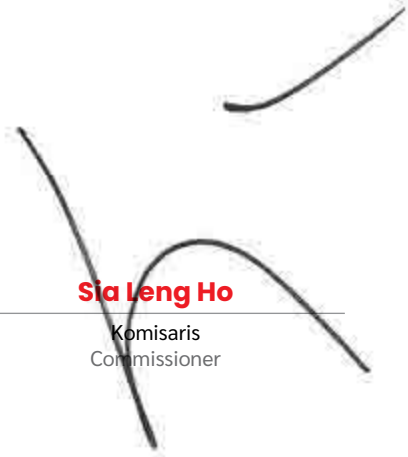
Dewan Komisaris
Board of Commissioners



Zaenal Abidin Ph.D
Komisaris Utama Independen
Independent President Commissioner



Gunawan Tenggarahardja
Komisaris/Komisaris Independen
Commissioner/Independent Commissioner



Sia Leng Ho
Komisaris
Commissioner

Surat Pernyataan Anggota Direksi tentang Tanggung Jawab atas Laporan Tahunan dan Keberlanjutan 2023 PT Bank Victoria International Tbk

Statement of Members of the Board of Directors on the Responsibility for the 2023 Annual and Sustainability Report of PT Bank Victoria International Tbk

Kami, yang bertanda tangan di bawah ini, menyatakan bahwa semua informasi dalam Laporan Tahunan dan Keberlanjutan PT Bank Victoria International Tbk tahun 2023 telah dimuat secara lengkap dan bertanggung jawab penuh atas kebenaran isi Laporan Tahunan dan Keberlanjutan Bank.

We, the undersigned, hereby declare that all information in the Annual and Sustainability Report of PT Bank Victoria International Tbk for year 2023 has been fully contained and we shall be fully responsible to the correctness of contents in the Annual and Sustainability Report of the Bank.

Demikian pernyataan ini dibuat dengan sebenarnya.

This statement is hereby made in all truthfulness.

Jakarta, 17 April 2024

Direksi
Board of Directors

Achmad Friscantono
Direktur Utama
President Director

Rusli
Wakil Direktur Utama
Deputy President Director

Lembing
Direktur Bisnis
Director of Business

Debora Wahjutirto Tanoyo
Direktur Keuangan
Director of Finance

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

PROFIL PERUSAHAAN

Company Profile





Identitas Perusahaan
Company Identity

Nama Perusahaan
Company Name

PT Bank Victoria International Tbk

Alamat
Address

Gedung Graha BIP Lt. 10
Jl. Gatot Subroto Kav. 23
Jakarta Selatan / South Jakarta 12930
T : (021) 5228 888
F : (021) 5228 777
E : corsec@victoriabank.co.id
W : www.victoriabank.co.id

Tanggal Pendirian
Date of Establishment

28 Oktober 1992
28 October 1992

Bidang Usaha
Line of Business

Bank Umum
Commercial Bank

Kode Saham
Share Code

BVIC

Tanggal Pencatatan Saham di Bursa Efek Indonesia
Share Listing Date in Indonesia Stock Exchange

30 Juni 1999
30 June 1999

Dasar Hukum Pendirian
Legal Basis of Establishment

Didirikan dengan nama PT Bank Victoria pada tanggal 28 Oktober 1992 berdasarkan Akta Notaris Amrul Partomuan Pohan, SH, LLM No. 71 yang selanjutnya diadakan pembetulan dengan Akta No. 30 tanggal 8 Juni 1993 dari notaris yang sama.

Incorporated under the name PT Bank Victoria on 28 October 1992 based on the Notary Deed No. 71 by Amrul Partomuan Pohan, SH, LLM, which was subsequently amended by Deed No. 30 dated 8 June 1993 of the same notary.

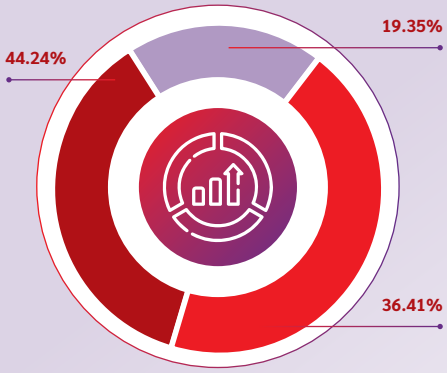
Modal Dasar
Authorized Capital

Rp4,100,000,000,000

Modal Ditempatkan dan Disetor Penuh
Subscribed and FullyPaid-Up Capital

Rp1,584,823,577,800





Kepemilikan Saham
Share Ownership

PT Victoria Investama Tbk	: **44.24%**
Masyarakat / Public <5%	: **36.41%**
Suzanna Tanojo	: **19.35%**

Media Sosial
Social Media

@bankvictoria

BankVictoriaID

Bank Victoria

PT Bank Victoria International Tbk

Perubahan Organisasi yang Bersifat Signifikan
Significant Changes in Organization

Sepanjang tahun 2023, tidak terdapat perubahan signifikan yang terjadi pada Bank Victoria, baik terkait penutupan atau pembukaan cabang baru, pembukaan atau penutupan unit usaha baru, maupun penggabungan usaha.

Throughout 2023, there were no significant changes that occurred at Bank Victoria, either related to closing or opening new branch, opening or closing new business unit, or business merger.

Riwayat Singkat
Brief History

1992
Didirikan di Jakarta dengan nama PT Bank Victoria pada tanggal 28 Oktober 1992.

Incorporated in Jakarta under the name PT Bank Victoria on 28 October 1992.

1994
Memulai operasi sebagai Bank Umum secara komersial berdasarkan izin dari Menteri Keuangan Republik Indonesia pada tanggal 5 Oktober 1994.

Started its operations as a Commercial Bank based on the license from the Finance Minister of the Republic of Indonesia dated 5 October 1994.

1997
Memperoleh izin dari Bank Indonesia untuk beroperasi sebagai Pedagang Valuta Asing pada tanggal 25 Mei 1997.

Obtained Foreign Exchange License from Bank Indonesia to operate as a Foreign Exchange Trader on 25 May 1997.

1999
Menjadi perusahaan publik dengan melakukan Penawaran Umum Perdana Saham sejumlah 250.000.000 lembar saham dengan nilai nominal Rp100,- per saham dan sejumlah 80.000.000 Waran Seri I efektif pada tanggal 4 Juni 1999.

Became a publicly listed company by conducting an Iinitial Public Offering of 250,000,000 shares with a nominal value of Rp100 per share and 80,000,000 Series I Warrants effectively on 4 June 1999.

2000
Melakukan penawaran umum terbatas (PUT) I sejumlah 614.000.000 lembar saham dengan nilai nominal sebesar Rp100,- per saham dengan harga yang ditawarkan sebesar Rp115,- per saham dan sejumlah 85.960.000 Waran Seri II pada tanggal 28 September 2000.

Conducted a limited public offering (LPO) I of 614,000,000 shares with a nominal value of Rp100 per share and offering price of Rp115 per share and 85,960,000 Series II Warrants on 28 September 2000.

2011
Melakukan PUT V sejumlah 1.954.919.259 lembar saham dengan nilai nominal dan harga yang ditawarkan sebesar Rp100,- per saham dan sejumlah 1.448.939.990 Waran Seri VI pada 4 Juli 2011.

Conducted LPO V of 1,954,919,259 shares with both nominal value and offering price of Rp100 per share and 1,448,939,990 Series VI Warrants on 4 July 2011.

2010
Melakukan perubahan nama Entitas Anak Bank Victoria dari PT Bank Swaguna menjadi PT Bank Victoria Syariah pada tanggal 19 Januari 2010.

Changed the name of Bank Victoria's Subsidiary from PT Bank Swaguna to PT Bank Victoria Syariah on 19 January 2010.

2008
Melakukan PUT IV sejumlah 1.167.498.560 lembar saham dengan nilai nominal dan harga yang ditawarkan sebesar Rp100,- per saham dan sejumlah 630.449.220 Waran Seri V pada tanggal 11 Juli 2008.

Conducted LPO IV of 1,167,498,560 shares with both nominal value and offering price of Rp100 per share and 630,449,220 Series V Warrants on 11 July 2008.

2007
Mengakuisisi PT Bank Swaguna sebagai Entitas Anak.
Acquired PT Bank Swaguna as a Subsidiary.

2006
Melakukan PUT III sejumlah 670.363.760 lembar saham dengan nilai nominal Rp100,- per saham dengan harga yang ditawarkan sebesar Rp115,- per saham dan sejumlah 469.277.676 Waran Seri IV pada tanggal 13 Juli 2006.

Conducted LPO III of 670,363,760 shares with a nominal value of Rp100 per share and offering price of Rp115 per share and 469,277,676 Series IV Warrants on 13 July 2006.

2003
Melakukan PUT II sejumlah 705.243.360 lembar saham dengan nilai nominal dan harga yang ditawarkan sebesar Rp100,- per saham dan sejumlah 423.146.016 Waran Seri III pada tanggal 20 Maret 2003.

Conducted LPO II of 705,243,360 shares with both nominal value and offering price of Rp100 per share and 423,146,016 Series III Warrants on 20 March 2003.

2016

- Memperoleh izin operasional sebagai Bank Devisa berdasarkan Surat Kepala Departemen Perizinan dan Informasi Perbankan Otoritas Jasa Keuangan No. S-423/PB.12/2016 pada tanggal 13 Desember 2016.
- Memberikan layanan transaksi dalam valuta asing yang meliputi transaksi pengiriman uang (*remittance*), perdagangan international (*trade finance*), *treasury,* serta layanan interbank lainnya setelah menjadi Bank Devisa.
- Melakukan Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) sebesar 9,00% oleh DEG (Deutsche Investitions-Und Entwicklungsgesellschaft MbH).

- Obtained operational license as a Foreign Exchange Bank based on the Letter of Banking Licensing and Information Department Head of the Financial Services Authority No. S-423/PB.12/2016 dated 13 December 2016.
- Providing transaction services in foreign currencies which include remittance transactions, international trade (trade finance), treasury, and other interbank services after becoming a Foreign Exchange Bank.
- Conducting Capital Addition Without Preemptive Rights (PMTHMETD) of 9.00% by DEG (Deutsche Investitions-Und Entwicklungsgesellschaft MbH).

2018

Memperluas jaringan kantor dengan membuka kantor cabang utama di Semarang, Jawa Tengah, dan di Makassar, Sulawesi Selatan.

Expanding the office network by opening main branch offices in Semarang, Central Java, and in Makassar, South Sulawesi.

2019

- Melakukan PMTHMETD sejumlah 280.898.877 lembar saham oleh PT Victoria Investama Tbk dan PT Nata Patindo.
- Memperluas jaringan kantor dengan membuka kantor cabang utama di Solo, Jawa Tengah, dan Medan, Sumatera Utara.

- Conducted PMTHMETD of 280,898,877 shares of PT Victoria Investama Tbk and PT Nata Patindo.
- Expanded the office network by opening main branch offices in Solo, Central Java, and in Medan, North Sumatra.

2020

Melakukan digitalisasi pelayanan perbankan serta pengoptimalan *Internet Banking Mobile Banking* (IBMB) dan Victoria *Internet Banking* Bisnis (ViBiz) yang mempermudah nasabah melakukan transaksi.

Digitized banking services and optimized Internet Banking Mobile Banking (IBMB) and Victoria Internet Banking Bisnis (ViBiz) to make transactions easier for customers.

2023

- **Melakukan Penambahan Saham Hasil *Exercise* Waran Seri VII PT Bank Victoria International Tbk sejumlah 1.064 Waran.**
- **Melakukan Penawaran Umum Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 sebesar Rp500.000.000.000,-.**

- **Added Shares from Series VII Warrant Exercise of PT Bank Victoria International Tbk of 1,064 Warrants.**
- **Conducted Public Offering of Bank Victoria Continuous Bonds III Phase I of 2023 amounting to Rp500,000,000,000.**

2022

- Melaksanakan peresmian sebagai Bank Persepsi.
- Melakukan PMHMETD sejumlah 2.553.461.919 lembar saham.
- Melakukan PMHMETD sejumlah 2.807.640.227 lembar saham.
- Bank Victoria melakukan divestasi sebanyak 80% saham milik Bank di Bank Victoria Syariah kepada PT Victoria Investama Tbk.

- Carried out inauguration as Perception Bank.
- Conducted PMHMETD of 2,553,461,919 shares.
- Conducted PMHMETD of 2,807,640,227 shares.
- Bank Victoria divested 80% of the Bank's shares in Bank Victoria Syariah to PT Victoria Investama Tbk.

2021

- PMTHMETD sejumlah 586.205.939 lembar saham oleh PT Victoria Investama Tbk, PT Victoria Insurance Tbk, PT Victoria Alife Indonesia, PT Prolestari Megapersada, PT Regis Pratama Indonesia, dan PT Emperor Finance Indonesia.
- PMTHMETD sejumlah 948.979.590 lembar saham oleh PT Victoria Investama Tbk, PT Victoria Alife Indonesia, PT Victoria Insurance Tbk, PT Victoria Sekuritas Indonesia, PT Regis Pratama Indonesia, PT Tridaya Investindo, PT Emperor Finance Indonesia, dan PT Bhuwanatala Indah Permai Tbk.

- PMTHMETD of 586,205,939 shares by PT Victoria Investama Tbk, PT Victoria Insurance Tbk, PT Victoria Alife Indonesia, PT Prolestari Megapersada, PT Regis Pratama Indonesia, and PT Emperor Finance Indonesia.
- PMTHMETD of 948,979,590 shares by PT Victoria Investama Tbk, PT Victoria Alife Indonesia, PT Victoria Insurance Tbk, PT Victoria Sekuritas Indonesia, PT Regis Pratama Indonesia, PT Tridaya Investindo, PT Emperor Finance Indonesia, and PT Bhuwanatala Indah Permai Tbk.

Visi dan Misi Perusahaan
Company's Vision and Mission

Pernyataan Persetujuan atas Visi dan Misi Perusahaan
Statement of Approval of the Company's Vision and Mission

"Visi dan Misi Bank Victoria telah disetujui oleh Dewan Komisaris dan Direksi berdasarkan Keputusan Direksi No. 002/SK-DIR/10/19 tanggal 20 November 2023 tentang Visi dan Misi PT Bank Victoria International Tbk."
"Bank Victoria's Vision and Mission have been approved by the Board of Commissioners and Board of Directors based on the Board of Directors' Decision No. 002/SK-DIR/10/19 dated 20 November 2023 on the PT Bank Victoria International Tbk Vision and Mission."

Visi
Vision

Menjadi Bank pilihan Nasabah yang dipercaya, sehat, efisien, dan mendukung pertumbuhan berkelanjutan.

To become the customers' preferred bank, which is trustworthy, sound and efficient, and supports sustainable growth.

bank victoria



Pilihan Nasabah

Customers' Preferred

Bank Victoria dikenal, dipercaya, serta menjadi pilihan nasabah untuk memenuhi kebutuhan nasabah dalam mendapatkan produk dan layanan perbankan.

Bank Victoria is recognized, trusted, and preferred by customers to fulfill their needs in obtaining banking products and services.

Dipercaya

Trustworthy

Bank Victoria berkomitmen menjadi bank yang bisa memberikan rasa aman dan kepastian bagi para nasabah, karyawan, Pemegang Saham, dan *stakeholders* lainnya.

Bank Victoria is committed to being the bank that can provide security and certainty to the customers, human capital, Shareholders, and other stakeholders.

Sehat dan Efisien

Sound and Efficient

Bank Victoria mempunyai struktur modal yang kuat, kondisi keuangan yang sehat, serta didukung oleh operasional perbankan yang efisien.

Bank Victoria has strong capital structure, sound financial condition, and is supported by efficient banking operation.

Misi
Mission



Customers

Senantiasa berupaya memenuhi kebutuhan nasabah, membina hubungan yang baik dengan nasabah, serta memberi layanan yang terbaik kepada para nasabah.

Always attempt to fulfill the customers' needs, to develop good relationship with the customers, and to provide the best services for the customers.

People

Mengembangkan sumber daya manusia yang profesional, berprinsip, dan berdedikasi untuk memberikan layanan serta memenuhi kebutuhan nasabah.

Mengembangkan sumber daya manusia yang profesional, berprinsip, dan berdedikasi untuk memberikan layanan serta memenuhi kebutuhan nasabah.

Operations

Menjalankan operasional perbankan yang aman, cepat, dan handal dengan tetap memperhatikan ketentuan yang berlaku.

Conduct safe, fast, and reliable banking operations with due observance of the applicable regulations.

Governance, Risk, and Compliance

Mengimplementasikan proses manajemen risiko secara *prudent* serta konsisten dengan memperhatikan prinsip-prinsip kehatian-hatian, tata kelola Bank, dan keuangan berkelanjutan.

Implement a prudent and consistent risk management processes with due observance of the principles of prudence, bank governance, and sustainable finance.

Mendukung Pertumbuhan Berkelanjutan

Support Sustainable Growth

Bank Victoria senantiasa memperhatikan pertumbuhan yang mengedepankan aspek manusia (*people*), lingkungan (*planet*), dan nilai bagi pemangku kepentingan (*profit*).

Bank Victoria always pays attention to growth that prioritize aspects of people, environment (planet), and value for stakeholders (profit).

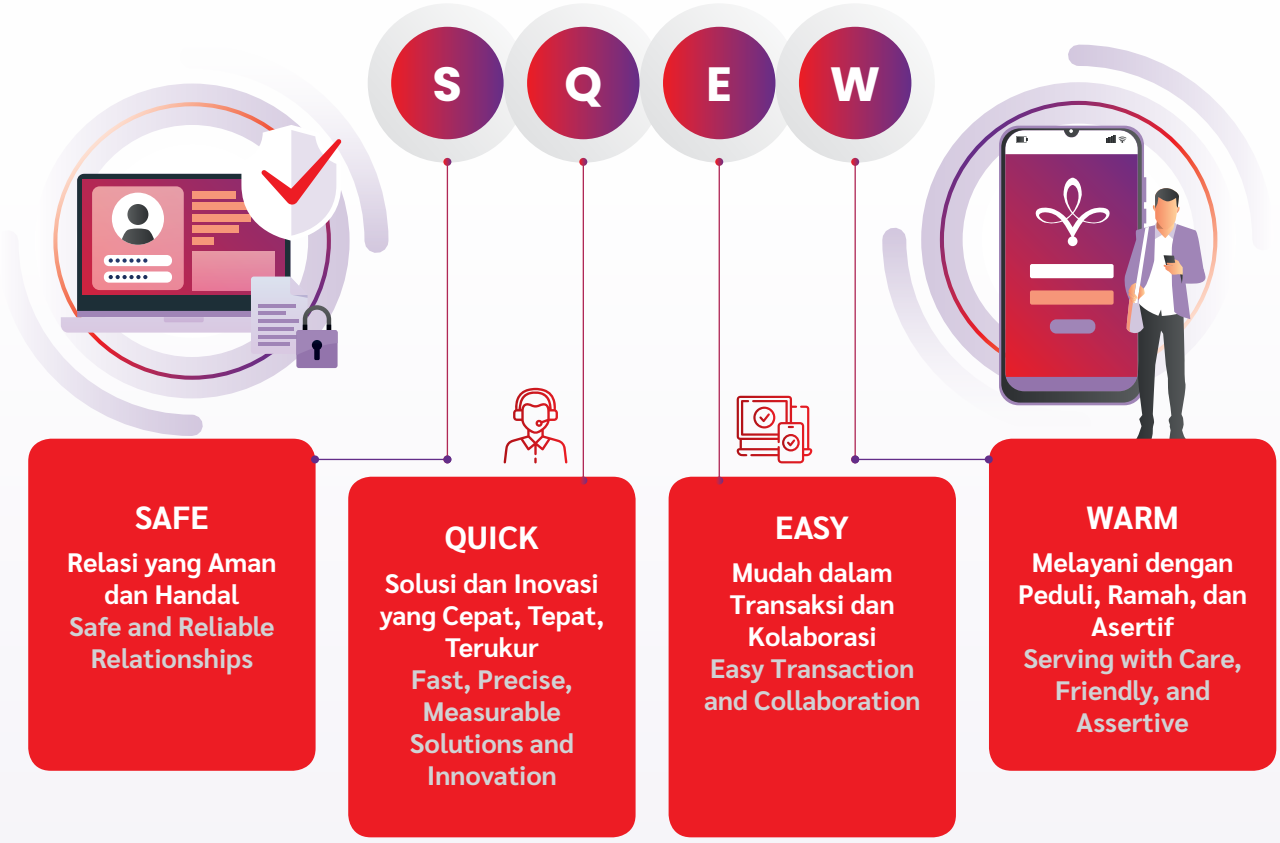
Tinjauan Ulang Visi dan Misi oleh Dewan Komisaris dan Direksi

Visi dan Misi Bank secara berkala ditinjau dengan mempertimbangkan perubahan kondisi lingkungan eksternal maupun internal. Hasil reviu Visi dan Misi Bank oleh Dewan Komisaris dan Direksi yang dilakukan di tahun 2023 dinyatakan telah sesuai dengan perubahan kondisi lingkungan eksternal maupun internal dan masih relevan di tahun 2023.

Review of Vision and Mission by the Board of Commissioners and Board of Directors

The Bank's Vision and Mission are periodically reviewed by considering changes in external and internal environmental conditions. The review results of the Bank's Vision and Mission performed by the Board of Commissioners and Board of Directors in 2023 were stated to be in accordance with changes in external and internal environmental conditions and were still relevant in 2023.

Nilai Budaya Perusahaan
Corporate Cultural Values





Kegiatan Usaha
Line of Business

Mengacu pada Anggaran Dasar Bank yang tertuang dalam Akta No. 42 tanggal 19 Juni 2020 disebutkan bahwa maksud dan tujuan Bank Victoria yaitu menjalankan usaha sebagai bank umum sesuai dengan ketentuan peraturan perundang-undangan yang berlaku. Sepanjang tahun 2023, Bank Victoria telah menjalankan kegiatan usaha utama dan penunjang yang diuraikan sebagai berikut:

Referring to the Bank's Articles of Association as stipulated in the Deed No. 42 dated 19 June 2020 the purposes and objectives of Bank Victoria are to run business as a commercial bank in accordance with the provisions of applicable laws and regulations. Throughout 2023, Bank Victoria carried out main and supporting business activities, described as follows:

Kegiatan Usaha berdasarkan Anggaran Dasar yang Dijalankan pada Tahun 2023
Business Activities Run in 2023 based on Articles of Association

Kegiatan Usaha Utama / Main Business Activities	

• Menghimpun dana dari masyarakat dalam bentuk simpanan giro, deposito berjangka, sertifikat deposito, tabungan, dan/atau bentuk lainnya yang dipersamakan dengan itu;
• Memberikan kredit, baik kredit jangka menengah, panjang atau pendek, maupun jenis lainnya yang lazim dalam dunia perbankan;
• Menerbitkan surat pengakuan utang;
• Membeli, menjual, atau menjamin atas risiko sendiri maupun untuk kepentingan dan atas perintah nasabahnya:
  • Surat-surat wesel, termasuk wesel yang diakseptasi oleh Bank yang masa berlakunya tidak lebih lama dari kebiasaan dalam perdagangan surat-menyurat tersebut;
  • Surat pengakuan utang dan kertas dagang lainnya yang masa berlakunya tidak lebih lama dari kebiasaan dalam perdagangan surat-surat tersebut;
  • Kertas perbendaharaan negara dan surat jaminan pemerintah;
  • Sertifikat Bank Indonesia;
  • Obligasi;
  • Surat promes yang dapat diperdagangkan dengan berjangka waktu sampai dengan 1 (satu) tahun; dan
  • Surat berharga lain yang berjangka waktu sampai dengan 1 (satu) tahun;
• Memindahkan uang, baik untuk kepentingan sendiri maupun untuk kepentingan nasabah;
• Menempatkan dana pada, meminjam dana dari, atau meminjamkan dana kepada bank lain, baik dengan menggunakan surat, sarana telekomunikasi maupun dengan wesel unjuk, cek, atau sarana lainnya;
• Menerima pembayaran dari tagihan atas surat berharga dan melakukan perhitungan dengan atau antara pihak ketiga;
• Melakukan penempatan dana dari nasabah kepada nasabah lainnya dalam bentuk surat berharga yang tercatat di bursa efek;
• Melakukan kegiatan dalam valuta asing dengan memenuhi ketentuan yang ditetapkan oleh Bank Indonesia; dan
• Menyediakan pembiayaan dan/atau melakukan kegiatan lain, termasuk kegiatan berdasarkan prinsip syariah sesuai dengan ketentuan yang ditetapkan oleh Bank Indonesia.
	• Collect funds from the society in the form of current accounts, time deposits, certificates of deposit, savings, and/or other forms equivalent;
	• Provide credits, whether medium-term, long-term, or short-term, and other types prevalent in the banking world;
	• Issue debt certificates;
	• Buy, sell, or guarantee on own risk and for the interest and upon the order of its customers:
	  • Money orders, including accredited money orders by the Bank in which the validity period is not longer than the custom of the trade of such papers;
	  • Debt certificates and other trade papers in which the validity period is not longer than the custom of the trade of such papers;
	  • State treasury bills and government guarantee letter;
	  • Bank Indonesia Certificates;
	  • Bonds;
	  • Short-term tradeable promissory notes with validity period of up to 1 (one) year; and
	  • Other securities with validity period of up to 1 (one) year;
	• Transfer of money, both for own interest and for the customers' interest;
	• Place funds in, borrow funds from, or lend funds to other banks, either by mail, telecommunication means, or by sight draft, check, or other means;
	• Receive payments from claims on securities and perform calculations with or between third parties;
	• Perform placement of funds from a customer to another customer in the form of securities listed in stock exchange;
	• Perform activities in foreign currencies by meeting the provisions stipulated by Bank Indonesia; and
	• Provide financing and/or perform other activities including activities based on sharia principles in accordance with the provisions stipulated by Bank Indonesia.

Kegiatan Usaha Penunjang / Supporting Business Activities	
• Melakukan kegiatan sebagai penyelenggara dana pensiun sesuai dengan peraturan perundang-undangan yang berlaku, baik selaku pendiri dana pensiun pemberi kerja maupun selaku pendiri dan/atau peserta dana pensiun lembaga keuangan; • Melakukan kegiatan penyertaan modal pada bank atau perusahaan lain di bidang keuangan, sewa guna usaha, perusahaan modal ventura, perusahaan efek, perusahaan asuransi, lembaga kliring dan penjamin, serta lembaga penyimpanan dan penyelesaian dengan memenuhi ketentuan yang ditetapkan oleh instansi yang berwenang; dan • Melakukan kegiatan penyertaan modal sementara untuk mengatasi kredit macet, termasuk kegagalan pembiayaan berdasarkan prinsip syariah dengan syarat harus menarik kembali pernyataannya sesuai dengan ketentuan yang ditetapkan oleh Bank Indonesia.	• Conduct activities as the Pension Fund organizers in accordance with the applicable laws and regulations, either as the founder of the employer's pension fund or as the founder and/or participant of the pension fund of a financial institution; • Conduct equity participation in a bank or other company in the field of finance, leasing companies, venture capital firms, securities companies, insurance companies, clearing and guarantee institutions, as well as depository and settlement institutions in compliance with the provisions stipulated by the competent authorities; and • Conduct temporary equity participation to cope with NPL, including financing failure based on sharia principles subject to withdrawal of statements in accordance with the provisions stipulated by Bank Indonesia.

Produk Dan Jasa
Products and Servicess

Bank menyediakan beragam produk dan jasa sesuai dengan kebutuhan dan profil masing-masing nasabah. Produk dan jasa tersebut meliputi produk simpanan, produk pinjaman, serta berbagai layanan yang diuraikan sebagai berikut:

The Bank provides a variety of products and services according to each respective customer's needs and profile. Such products and services include savings products, loan products, and several other services described as follows:

Produk Simpanan
Savings Products

Tabungan
Savings
- Tabungan Victoria
  Victoria Savings
- Tabungan VIP Safe
  VIP Safe Savings
- Tabungan Victoria Junior
  Victoria Junior Savings
- Tabungan Victoria Bisnis
  Victoria Business Savings
- TabunganKu
  TabunganKu
- Tabungan Victoria Maxima
  Victoria Maxima Savings
- Tabungan Victoria EduSave
  Victoria EduSave Savings

Giro
Demand Deposit
- Giro Rupiah dan Giro Valas
  Rupiah Current Account and Foreign Current Account
- VIP Giro Rupiah dan VIP Giro Valas
  VIP Rupiah Current Account and VIP Foreign Current Account

Deposito
Time Deposits
- Deposito Rupiah
  Rupiah Time Deposits
- Deposito US Dollar
  USD Time Deposits

Produk Pinjaman
Loan Products

Kredit Produktif
Productive Loans
- *Corporate Lending*
  Corporate Lending
- *Commercial Lending*
  Commercial Lending
- *Small Medium Enterprise Lending*
  Small Medium Enterprise Lending
- *Multi Finance Lending*
  Multi Finance Lending
- Bank Garansi
  Bank Guarantee
- Surat Kredit Berdokumen Dalam Negeri (SKBDN)
  Domestic Letter of Credit (SKBDN)

Kredit Konsumtif
Consumptive Loans
- Kredit Pemilikan Rumah
  Home Ownership Loan
- Kredit Pemilikan Mobil
  Car Ownership Loan
- Kredit Multi Guna
  Multi-Purpose Loan
- Kredit *Implant Banking*
  Implant Banking Loan

Jasa Layanan Lainnya
Other Services

- Kliring/Inkaso
  Clearing/Payment
- Transfer
  Transfer
- *Real Time Gross Settlement*
  Real Time Gross Settlement
- Pembayaran Tagihan
  Bill Payment
- Kartu ATM
  ATM Card
- *Auto Save*
  Auto Save
- *Auto Debet*
  Auto Debit
- *Internet Banking dan Mobile Banking* Victoria
  Victoria Internet Banking and Mobile Banking
- BI-FAST
  BI-FAST
- Layanan Penerimaan Negara
  State Revenue Service

Layanan Bank Devisa
Foreign Exchange Bank Services

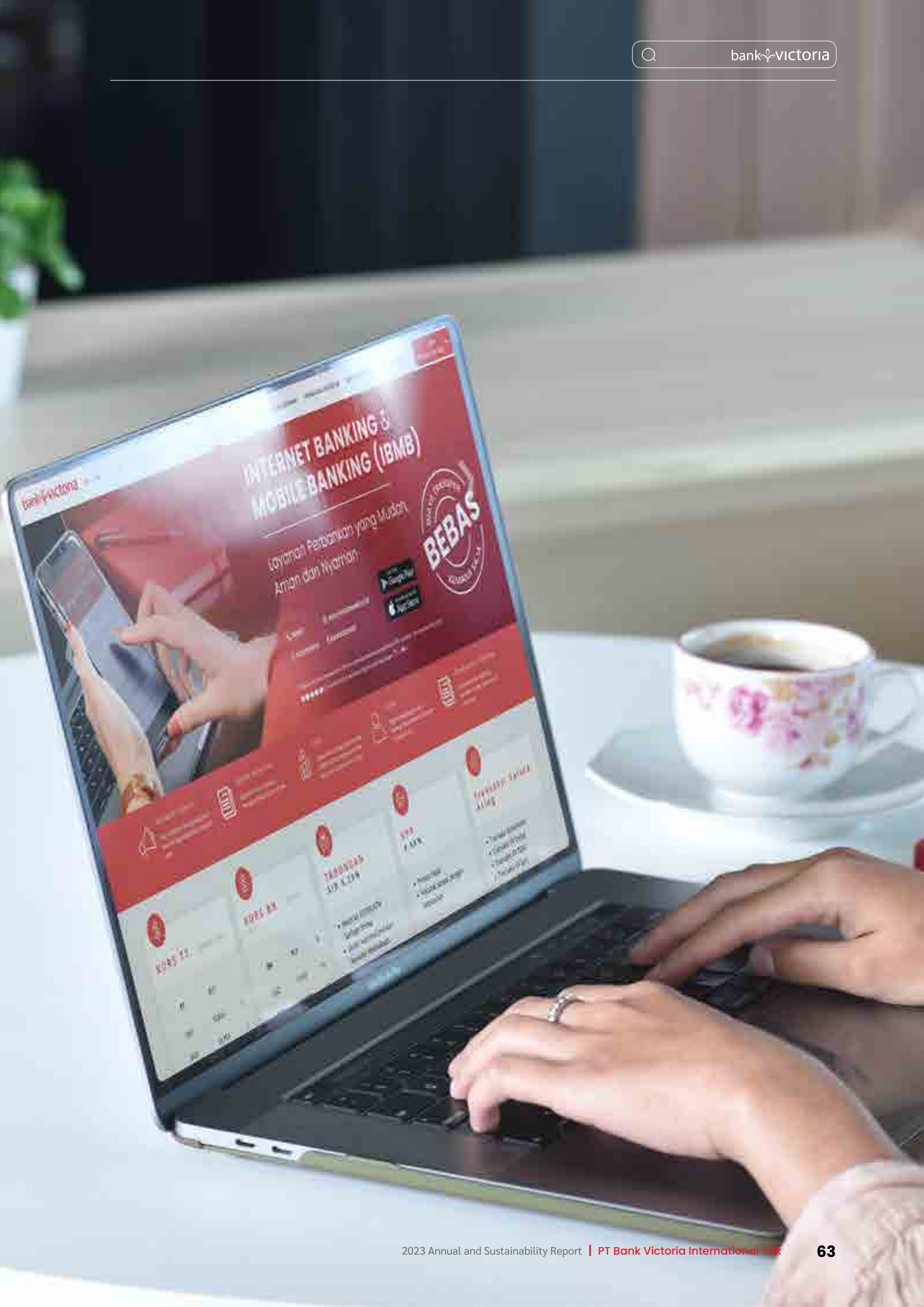
- Transaksi Kiriman Uang
  Remittance
- Perdagangan Internasional
  International Trade Finance
- *Treasury* dan Layanan Interbank Lainnya
  Treasury and Other Interbank Services

Produk Investasi
Investment Products

- SUN RITEL E-SBN
  Retail Government Bonds E-SBN
- Reksa Dana
  Mutual Funds
- *Bancassurance*
  Bancassurance

"Informasi lengkap terkait produk dan layanan Bank Victoria dapat di akses melalui situs web Bank yang beralamat di www.victoriabank.co.id."

"Complete information regarding Bank Victoria products and services can be accessed through the Bank's website at www.victoriabank.co.id."


INTERNET BANKING &
MOBILE BANKING (IBMB)
Layanan Perbankan yang Mudah,
Aman dan Nyaman
BEBAS

Wilayah Operasional
Operational Areas



Jaringan kantor Bank Victoria yang terdiri dari kantor pusat, kantor cabang, kantor cabang pembantu, serta jaringan kantor lainnya, seperti kantor kas, *payment point*, dan kantor layanan kas pada 3 tahun terakhir diuraikan sebagai berikut:

Bank Victoria's office network consisting of head office, branch offices, sub-branch offices, and other office network, such as cash offices, payment points, and cash service offices in the last 3 years is described as follows:

Jaringan Kantor
Office Network

Kantor	2023	2022	2021	Office
Kantor Pusat	1	1	1	Head Office
Kantor Cabang Utama	14	14	14	Main Branch Office
Kantor Cabang Pembantu	24	24	25	Sub-Branch Office
Jaringan Kantor Lain (Kantor Kas, *Payment Point*, dan Lainnya)	-	-	-	Other Office Network (Cash Office, Payment Point, and Others)
Total	**39**	**39**	**40**	**Total**



Jaringan Kantor per Wilayah Tahun 2023
Office Network by Region in 2023

Wilayah	Kantor Cabang Utama Main Branch Offices	Kantor Cabang Pembantu Sub-Branch Offices	Total	Area
Jakarta Timur	-	-	-	East Jakarta
Jakarta Selatan	2	5	7	South Jakarta
Jakarta Utara	1	4	5	North Jakarta
Jakarta Barat	-	9	9	West Jakarta
Jakarta Pusat	2	4	6	Central Jakarta
Bekasi, Cibubur, dan sekitarnya	-	-	-	Bekasi, Cibubur, and the surrounding
Tangerang dan sekitarnya	-	2	2	Tangerang and the surrounding
Cabang Luar Kota	9	-	9	Out-of-Town Branch
Total	**14**	**24**	38	**Total**

Alamat Kantor Pusat, Kantor Cabang Utama, dan Kantor Cabang Pembantu Bank Victoria

Address of Head Office, Main Branch Offices, and Sub-Branch Offices of Bank Victoria

Kantor Pusat
Head Office

PT Bank Victoria International Tbk

Gedung Graha BIP Lt. 10
Jl. Gatot Subroto Kav. 23
Jakarta Selatan 12930

(021) 5228 888
(021) 5228 777
corsec@victoriabank.co.id
www.victoriabank.co.id

Kantor Cabang Utama
Main Branch Offices

KCU BIP Gedung Graha BIP Lt. Dasar Jl. Gatot Subroto Kav. 23 Jakarta Selatan 12930 T : (021) 5258 208 F : (021) 5258 028	**KCU Bali** Jl. Raya Imam Bonjol No. 117 Dusun BR. Tenten Bali 80114 T : (0361) 8451 000 F : (0361) 8451 010	**KCU Bandung** Jl. Braga No. 16 Kel. Braga, Kec. Sumur Bandung Bandung, Jawa Barat 40111 T : (022) 4266 846 F : (022) 4266 845	**KCU Bogor** Jl. Pakuan No. 8 Kel. Baranangsiang, Kec. Bogor Timur Bogor, Jawa Barat 16143 T : (0251) 8343 800 (*Hunting*) (0251) 8343 804 (0251) 8343 806 (0251) 8343 805 (*Direct*) F : (0251) 8343 807
KCU Cideng Jl. Cideng Timur No. 33 Kel. Petojo Utara, Kec. Gambir Jakarta Pusat 10130 T : (021) 6338 913 F : (021) 6338 914	**KCU Fatmawati** Jl. RS Fatmawati No. 85A Cipete Utara, Kebayoran Baru Jakarta Selatan 12150 T : (021) 7201 496 F : (021) 7201 497	**KCU Kelapa Gading** Jl. Taman Mandiri I No. 8 Kav. A1-B1 Kelapa Gading Timur Jakarta Utara 14240 T : (021) 4514 012 F : (021) 4514 013	**KCU Makassar** Ruko Poros Boulevard/Ruko Emerald No. 16 Jl. Boulevard Masale Kel. Masale, Kec. Panakkukang Makassar, Sulawesi Selatan 90231 T : (0411) 4093 171 F : (0411) 4093 262
KCU Manado Jl. Walter Monginsidi Komplek Ruko Bahu Mall Blok E No. 5 Kel. Bahu, Kec. Malalayang Manado, Sulawesi Utara 95115 T : (0431) 831 431 F : (0431) 831 427	**KCU Medan** Jl. Zainal Arifin No. 53C Kel. Madras Hulu, Kec. Medan Polonia Medan, Sumatera Utara 20153 T : (061) 8051 0979 F : (061) 4576 274	**KCU Semarang** Jl. Raya Pemuda No. 108 Kel. Kembang Sari Kec. Semarang Tengah Jawa Tengah 50139 T : (024) 3587 048 F : (024) 3587 049	**KCU Senayan** Gedung Bank Panin Senayan Lt. Dasar Jl. Jend. Sudirman No. 1 Kel. Gelora, Jakarta Selatan 12710 T : (021) 5735 425 F : (021) 5735 429
KCU Solo Jl. Brigjen Slamet Riyadi No. 330 Kel. Purwosari, Kec. Laweyan Surakarta, Jawa Tengah 57142 T : (0271) 601 1005 F : (0271) 601 1010		**KCU Surabaya** Jl. Raya Darmo No. 173 Kel. Darmo, Kec. Wonokromo Surabaya 60241 T : (031) 5670 778 (*Hunting*) F : (031) 5670 775	

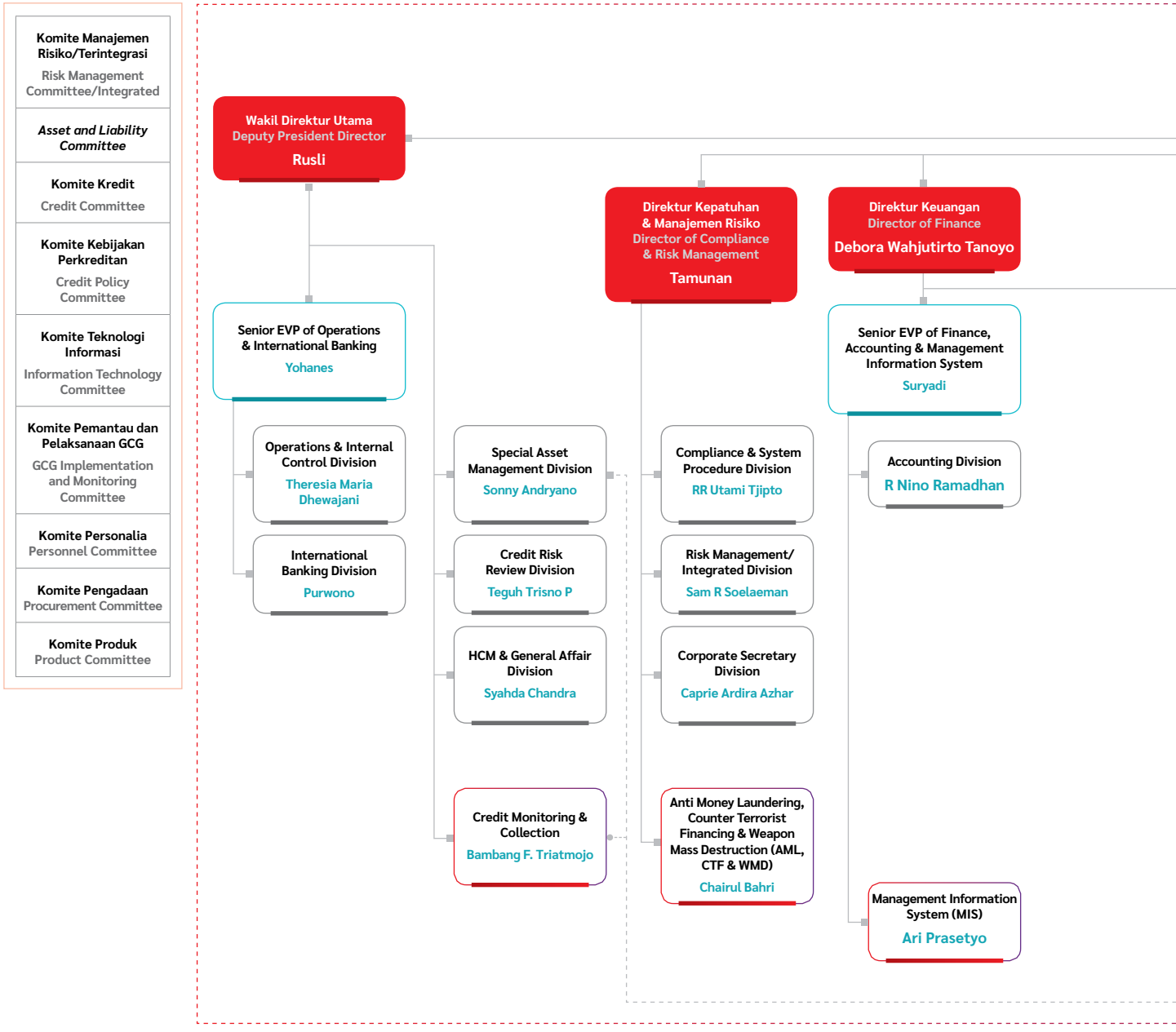
Kantor Cabang Pembantu
Sub-Branch Offices

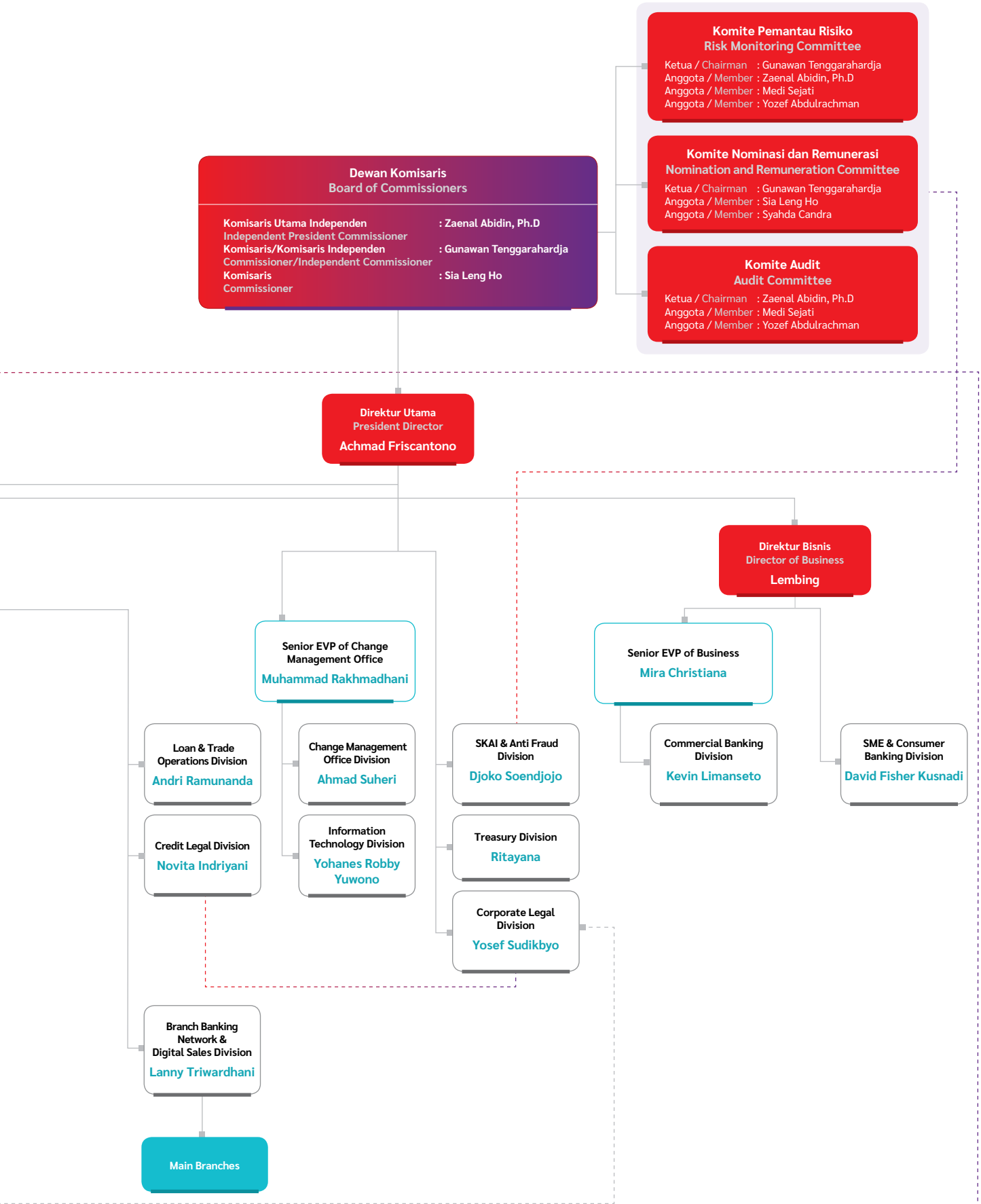
KCP BSD Bumi Serpong Damai Sektor IV Blok RE No. 52 Kel. Lengkong Wetan, Kec. Serpong Tangerang 15318 T : (021) 5315 2783 F : (021) 5315 2785	**KCP Central Park** Garden Shopping Arcade B/08/BG Jl. Tanjung Duren Raya Kav. 5-9 Tanjung Duren Jakarta Barat 11470 T : (021) 2920 6257 F : (021) 2920 6258	**KCP Citra Dua** Rukan Citra Niaga Blok A/5 Kel. Pegadungan, Kec. Kalideres Jakarta Barat 11830 T : (021) 5437 6656 F : (021) 5437 6695	**KCP Duta Mas** Komplek Perumahan Taman Duta Mas Blok D8 No. 12 Kel. Wijaya Kusuma, Kec. Grogol Petamburan Jakarta Barat 11460 T : (021) 5697 9990 F : (021) 5697 9996
KCP Duta Merlin Komplek Pertokoan Duta Merlin Blok A No. 10 Jl. Gajah Mada No. 3-5 Kel. Petojo Utara, Kec. Gambir Jakarta Pusat 10160 T : (021) 6386 5970 F : (021) 6386 5971	**KCP Gading Serpong** Ruko Rodeo Drive Blok B No. 6 Jl. Boulevard Gading Serpong Kel. Pakulonan Barat, Kec. Kelapa Dua Tangerang 15333 T : (021) 5421 7245 F : (021) 5421 7247	**KCP Grand Wijaya** Komplek Grand Wijaya Blok C No. 10 Jl. Wijaya II Kel. Pulo, Kec. Kebayoran Baru Jakarta Selatan 12160 T : (021) 7200 009 F : (021) 7202 878	**KCP Green Garden** Komplek Green Garden Blok A 14 No. 28 Jl. Panjang Kedoya Utara Kel. Kedoya Utara, Kec. Kebon Jeruk Jakarta Barat 11520 T : (021) 5835 6803 F : (021) 5835 6844
KCP Kebon Jeruk Komplek Pertokoan Intercon Blok B No. 4-5 Jl. Meruya Ilir Raya Kel. Srengseng, Kec. Kembangan Jakarta Barat 11620 T : (021) 5874 427 F : (021) 5842 379	**KCP Kelapa Gading Boulevard** Komplek Ruko Kelapa Gading Blok LC-6 No. 14 Jl. Raya Boulevard Barat Kel. Kelapa Gading Barat Kec. Kelapa Gading Jakarta Utara 14240 T : (021) 4507 672 F : (021) 4528 854	**KCP Kemang** Jl. Kemang Raya No. 82 C Kel. Bangka, Kec. Mampang Prapatan Jakarta Selatan 12730 T : (021) 7193 521 F : (021) 7193 721	**KCP Mandala Tomang** Lobby Gedung Mandala Airlines Jl. Tomang Raya No. 33-37 Kel. Tomang, Kec. Grogol, Petamburan Jakarta Barat 11440 T : (021) 5697 2227 F : (021) 5697 2237
KCP Muara Karang 2 Jl. Pluit Karang Utara No. 46 Blok I1 Selatan Kav. 48 Penjaringan Jakarta Utara 14450 T : (021) 6604 144 F : (021) 6604 116	**KCP Pantai Indah Kapuk** Bukit Golf Mediterania Blok B/18 Pantai Indah Kapuk Kel. Kamal Muara, Kec. Penjaringan Jakarta Utara 14460 T : (021) 5694 5973 F : (021) 5694 5974	**KCP Patal Senayan** Rukan Permata Senayan Blok B No. 6 Jl. Tentara Pelajar Kel. Grogol Utara Kec. Kebayoran Lama Jakarta Selatan 12210 T : (021) 5794 0668 F : (021) 5794 0667	**KCP Pecenongan** Jl. Pecenongan Raya No. 26 Kel. Kebon Kelapa, Kec. Gambir Jakarta Pusat 10120 T : (021) 386 5627 F : (021) 386 5637
KCP Pondok Indah Plaza Pondok Indah Blok II Blok UPS No. 51 Jl. Metro Pondok Indah Kel. Pondok Pinang Kec. Kebayoran Lama Jakarta Selatan 12310 T : (021) 7591 5628 F : (021) 7591 5625	**KCP Puri Indah** Komplek Puri Indah Blok A No. 3 Jl. Puri Indah Raya Kel. Kembangan Selatan Kec. Kembangan Jakarta Barat 11610 T : (021) 582 0216 F : (021) 582 0217	**KCP Senayan City** Mall Senayan City Unit 6–11 Jl. Asia Afrika Lot 19 Kel. Gelora Senayan Kec. Tanah Abang Jakarta Pusat 10270 T : (021) 7278 1749 F : (021) 7278 1750	**KCP Sunter** Komplek Rukan Sunter Permai Blok A-9 Jl. Danau Sunter Utara Kel. Sunter Agung, Kec. Tanjung Priok Jakarta Utara 14350 T : (021) 6530 7347 F : (021) 6530 7348
KCP Taman Palem Lestari Ruko Taman Palem Blok D1 No. 19D Kel. Cengakareng Barat Kec. Cengkareng Jakarta Barat 11730 T : (021) 5596 0771 F : (021) 5596 0772	**KCP Tanah Abang Blok B** Jl. KH Fachrudin Pertokoan Grosir Mall Tanah Abang Blok B Lt. 5 Loss Ktr No. 2 Kel. Kampung Bali, Kec. Tanah Abang Jakarta Pusat 10240 T : (021) 831 431 F : (021) 831 427	**KCP Wisma Indocement** Wisma Indocement Lt. Dasar Jl. Jend. Sudirman Kav. 70–71 Kel. Setibudi, Kec. Setiabudi Jakarta Selatan 12970 T : (021) 5223 765 F : (021) 5223 762	**KCP Wisma Slipi** Wisma Slipi Lt. Dasar Jl. Letnan Jenderal S Parman Kav. 12 Kel. Kemanggisan, Kec. Palmerah Jakarta Barat 11480 T : (021) 5308 800 F : (021) 5307 207

Struktur Organisasi
Organization Structure

Struktur organisasi Bank Victoria berdasarkan Surat Keputusan Direksi No. 008A/SK-DIR/09/23 tanggal 8 September 2023 diungkapkan sebagai berikut:

The organizational structure of Bank Victoria is based on the Board of Director Decision Letter No. 008A/SK-DIR/09/23 dated 8 September 2023 disclosed as follows:




Komite Pemantau Risiko
Risk Monitoring Committee
Ketua / Chairman : Gunawan Tenggarahardja
Anggota / Member : Zaenal Abidin, Ph.D
Anggota / Member : Medi Sejati
Anggota / Member : Yozef Abdulrachman
Komite Nominasi dan Remunerasi
Nomination and Remuneration Committee
Ketua / Chairman : Gunawan Tenggarahardja
Anggota / Member : Sia Leng Ho
Anggota / Member : Syahda Candra
Komite Audit
Audit Committee
Ketua / Chairman : Zaenal Abidin, Ph.D
Anggota / Member : Medi Sejati
Anggota / Member : Yozef Abdulrachman
Dewan Komisaris
Board of Commissioners
Komisaris Utama Independen : Zaenal Abidin, Ph.D
Independent President Commissioner
Komisaris/Komisaris Independen : Gunawan Tenggarahardja
Commissioner/Independent Commissioner
Komisaris : Sia Leng Ho
Commissioner
Direktur Utama
President Director
Achmad Friscantono
Direktur Bisnis
Director of Business
Lembing
Senior EVP of Change Management Office
Muhammad Rakhmadhani
Senior EVP of Business
Mira Christiana
Loan & Trade Operations Division
Andri Ramunanda
Change Management Office Division
Ahmad Suheri
SKAI & Anti Fraud Division
Djoko Soendjojo
Commercial Banking Division
Kevin Limanseto
SME & Consumer Banking Division
David Fisher Kusnadi
Credit Legal Division
Novita Indriyani
Information Technology Division
Yohanes Robby Yuwono
Treasury Division
Ritayana
Corporate Legal Division
Yosef Sudikbyo
Branch Banking Network & Digital Sales Division
Lanny Triwardhani
Main Branches

Daftar Keanggotaan dalam Asosiasi
List of Association Membership

Nama Asosiasi Name of Association	Skala Asosiasi Scale of Association	Posisi Bank Bank Position
Lembaga Penjamin Simpanan Indonesia Deposit Insurance Corporation	Nasional National	Anggota Member
PT Kustodian Sentral Efek Indonesia Indonesia Central Securities Depository	Nasional National	Anggota Member
Perhimpunan Bank-Bank Umum Nasional Association of National Commercial Banks	Nasional National	Anggota Member
Asosiasi Emiten Indonesia Indonesian Public Listed Companies Association	Nasional National	Anggota Member
Ikatan Bankir Indonesia Indonesian Banker Institute	Nasional National	Anggota Member
Bankers Association for Risk Managemet	Nasional National	Anggota Member
Lembaga Alternatif Penyelesaian Sengketa Perbankan Indonesia Indonesian Alternative Agencies for Banking Dispute Resolution	Nasional National	Anggota Member
Indonesian Corporate Secretary Association	Nasional National	Anggota Member
Asosiasi Sistem Pembayaran Indonesia Indonesian Payment System Association	Nasional National	Anggota Member
Perhimpunan Pedagang Surat Hutang Bond Traders Association	Nasional National	Anggota Member

Profil Dewan Komisaris
Board of Commissioners Profile



ZAENAL ABIDIN Ph.D

Komisaris Utama Independen
President Commissioner Independent

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Sukabumi

Usia
Age
60 tahun / years old

Domisili
Domicile
Depok

Pernyataan Independensi
Statement of Independence
Beliau telah menjabat 5 (lima) periode sebagai Komisaris Independen dan telah menandatangani surat pernyataan independensi.

He has served for 5 (five) terms as Independent Commissioner and has signed a statement of independence.

Hubungan Afiliasi
Affiliation Relationship
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris lainnya, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

Does not have any affiliation with other members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

Dasar Pengangkatan dan Periode Menjabat
Sebagai Komisaris Utama Independen:
Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025).

Sebagai Komisaris/Komisaris Independen:
- Keputusan RUPS Tahunan tanggal 29 Juni 2012 (2012-2013);
- Keputusan RUPS Tahunan tanggal 28 Juni 2013 (2013-2016);
- Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019); dan
- Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022).

Riwayat Pendidikan
- Sarjana Ekonomi dari Universitas Islam Indonesia, Yogyakarta (1987);
- *Master of Management* dari ASIAN Institute of Management (AIM), Filipina (1997); dan
- *Doctor of Philosophy* dari Santo Tomas University, Filipina (2006).

Rangkap Jabatan
Di dalam Bank Victoria:
- Ketua Komite Audit Bank Victoria (sejak 2022); dan
- Anggota Komite Pemantau Risiko Bank Victoria (sejak 2022).

Di luar Bank Victoria:
- Dosen Perbanas Institute (sejak 1993); dan
- Asesor Manajemen Risiko Pasar Modal (sejak 2016).

Riwayat Jabatan
- *Pro Manager Treasury* dan Analisa Bidang Dana Perbankan Bank Summa (1989-1992);
- Peneliti Senior GCG Indonesia Institute Corporate Governance (2008-2018);
- Koordinator Staf Khusus Bidang Riset Asosiasi Perbanas (2011-2012);
- Dosen Sekolah Tinggi Ilmu Ekonomi Indonesia Banking School (2013-2019);
- Ketua Komite Pemantau Risiko Bank Victoria (2013-2022);
- Ketua Komite Tata Kelola Terintegrasi Grup Victoria (2015-2021); dan
- Komisaris Independen PT Sumberdaya Sewatama (2021-2022).

Sertifikasi
- Sertifikasi bidang Kepatuhan Perbankan Level Eksekutif dari Lembaga Sertifikasi Profesi Perbankan (2020-2023);
- Sertifikasi bidang Keahlian Profesi Pasar Modal sebagai Wakil Manajer Investasi dari The Indonesia Capital Market Institute (2018-2023);
- Sertifikasi bidang Manajemen Risiko Level Utama dari Lembaga Sertifikasi Profesi Pasar Modal (2019-2023);
- Sertifikasi bidang Asesor Kompetensi Level Asesmen/Uji Kompetensi dari Lembaga Sertifikasi Profesi Perbankan (2019-2022); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Level 2 dari Lembaga Sertifikasi Profesi Perbankan (2021-2025).

Penilaian Uji Kemampuan dan Kepatutan
Sebagai Komisaris Utama Independen:
Telah lulus *fit and proper test* dari OJK tanggal 28 Oktober 2022.

Sebagai Komisaris/Komisaris Independen:
Telah lulus *fit and proper test* dari Bank Indonesia tanggal 27 September 2012.

Basis of Appointment and Term of Office
As Independent President Commissioner:
Annual GMS Resolutions dated 3 June 2022 (2022-2025).

As Commissioner/Independent Commissioner:
- Annual GMS Resolutions dated 29 June 2012 (2012-2013);
- Annual GMS Resolutions dated 28 June 2013 (2013-2016);
- Annual GMS Resolutions dated 24 June 2016 (2016-2019); and
- Annual GMS Resolutions dated 10 May 2019 (2019-2022).

Education
- Bachelor of Economics from Islam Indonesia University, Yogyakarta (1987);
- Master of Management from ASIAN Institute of Management (AIM), the Philippines (1997); and
- Doctor of Philosophy from Santo Tomas University, the Philippines (2006).

Concurrent Positions
In Bank Victoria:
- Chairman of Audit Committee of Bank Victoria (since 2022); and
- Member of Risk Monitoring Committee of Bank Victoria since (2022).

Outside of Bank Victoria:
- Lecturer of Perbanas Institute (since 1993); and
- Assessor of Risk Management of Capital Market (since 2016).

History of Positions
- Pro Manager Treasury and Analysis in Banking Fund Sector of Bank Summa (1989-1992);
- GCG Senior Researcher of Indonesia Institute of Corporate Governance (2008-2018);
- Coordinator of Special Staff of Research Field of Perbanas Association (2011-2012);
- Lecturer of Sekolah Tinggi Ilmu Ekonomi Indonesia Banking School (2013-2019);
- Chairman of Risk Monitoring Committee of Bank Victoria (2013-2022);
- Chairman of Integrated Governance Committee of Victoria Group (2015-2021); and
- Independent Commissioner of PT Sumberdaya Sewatama (2021-2022).

Certification
- Certification in Banking Compliance Executive Level from Banking Profession Certification Institute (2020-2023);
- Certification in Capital Market Professional Expertise as Deputy Investment Manager from The Indonesia Capital Market Institute (2018-2023);
- Certification in Risk Management Main Level from the Banking Profession Certification Institute (2019-2023);
- Certification in Competency Assessment, Assessment Level/Competency Test from Banking Profession Certification Institute (2019-2022); and
- Certification in Banking Risk Management Level 2 from Banking Profession Certification Institute (2021-2025).

Fit and Proper Test
As Independent President Commissioner:
Passed the fit and proper test from the FSA on 28 October 2022.

As Commissioner/Independent Commissioner:
Passed the fit and proper test from Bank Indonesia on 27 September 2012.



GUNAWAN TENGGARAHARDJA

Komisaris/Komisaris Independen
Commissioner/Independent Commissioner

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Malang

Usia
Age
68 tahun / years old

Domisili
Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
- Keputusan RUPS Luar Biasa tanggal 24 Februari 2003 (2003-2007);
- Keputusan RUPS Luar Biasa tanggal 19 Desember 2007 (2007-2010);
- Keputusan RUPS Tahunan tanggal 25 Juni 2010 (2010-2013);
- Keputusan RUPS Tahunan tanggal 28 Juni 2013 (2013-2016);
- Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019);
- Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022); dan
- Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025).

Riwayat Pendidikan
Sarjana Teknik Sipil dari Institut Teknologi Bandung (1981).

Rangkap Jabatan
Di dalam Bank Victoria:
- Ketua Komite Nominasi dan Remunerasi Bank Victoria (sejak 2012); dan
- Ketua Komite Pemantau Risiko Bank Victoria (sejak 2022).

Di luar Bank Victoria:
Komisaris Independen PT Jakarta Setiabudi Internasional Tbk (sejak 2004).

Riwayat Jabatan
- *International Field Engineer 1 Schlumberger* OSA (1982-1984);
- *Assistant Manager* PT Bank Bali (1985-1988);
- *General Manager* PT Sampoerna Transport Nusantara (1989-1992);
- Direktur Eksekutif PT Duta Pertiwi Tbk (1992-1996);
- Direktur PT Bhuwanatala Indah Permai Tbk (1996-1998);
- Komisaris Utama PT Sigma Karya Sempurna (Bali Camp) (1998-2004);
- Ketua Komite Pemantau Risiko Bank Victoria (2015-2022); dan
- Anggota Komite Tata Kelola Terintegrasi Bank Victoria (2017-2021).

Sertifikasi
Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2021-2023).

Penilaian Uji Kemampuan dan Kepatutan
Sebagai Komisaris Utama Independen:
Telah lulus *fit and proper test* dari Bank Indonesia tanggal 22 April 2003.

Sebagai Komisaris/Komisaris Independen:
Telah lulus *fit and proper test* dari Bank Indonesia tanggal 13 September 2003.

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris lainnya, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

Pernyataan Independensi
Beliau telah menjabat 7 (tujuh) periode sebagai Komisaris Independen dan telah menandatangani surat pernyataan independensi.

Basis of Appointment and Term of Office
- Extraordinary GMS Resolutions dated 24 February 2003 (2003-2007);
- Extraordinary GMS Resolutions dated 19 December 2007 (2007-2010);
- Annual GMS Resolutions dated 25 June 2010 (2010-2013);
- Annual GMS Resolutions dated 28 June 2013 (2013-2016);
- Annual GMS Resolutions dated 24 June 2016 (2016-2019);
- Annual GMS Resolutions dated 10 May 2019 (2019-2022); and
- Annual GMS Resolutions dated 3 June 2022 (2022-2025).

Education
Bachelor of Civil Engineering from Bandung Institute of Technology (1981).

Concurrent Positions
In Bank Victoria:
- Chairman of Nomination and Remuneration Committee of Bank Victoria (since 2012); and
- Chairman of Risk Monitoring Committee of Bank Victoria (since 2022).

Outside of Bank Victoria:
Independent Commissioner of PT Jakarta Setiabudi Internasional Tbk (since 2004).

History of Positions
- International Field Engineer 1 of Schlumberger OSA (1982-1984);
- Assistant Manager of PT Bank Bali (1985-1988);
- General Manager of PT Sampoerna Transport Nusantara (1989-1992);
- Executive Director of PT Duta Pertiwi Tbk (1992-1996);
- Director of PT Bhuwanatala Indah Permai Tbk (1996-1998);
- President Commissioner of PT Sigma Karya Sempurna (Bali Camp) (1998-2004);
- Chairman of Risk Monitoring Committee of Bank Victoria (2015-2022); and
- Member of Integrated Governance Committee of Bank Victoria (2017-2021).

Certification
Risk Management Certification Level 5 from Banking Profession Certification Institute (2021-2023).

Fit and Proper Test
As Independent President Commissioner:
Passed the fit and proper test from Bank Indonesia on 22 April 2003.

As Commissioner/Independent Commissioner:
Passed the fit and proper test from Bank Indonesia on 13 September 2003.

Affiliation Relationship
Does not have any affiliation with other members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

Statement of Independence
He has served for 7 (seven) terms as Independent Commissioner and has signed a statement of independence.



SIA LENG HO

Komisaris
Commissioner

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Jakarta

Usia
Age
64 tahun / years old

Domisili
Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Keputusan RUPS Luar Biasa tanggal 19 Oktober 2022 (2022-2025).

Riwayat Pendidikan
Bachelor of Business Administration dari University of San Francisco (1985).

Rangkap Jabatan
Di dalam Bank Victoria:
Anggota Komite Nominasi dan Remunerasi Bank Victoria (sejak 2022).

Di luar Bank Victoria:
Komisaris Independen PT Central Proteina Prima Tbk (sejak 2023).

Riwayat Jabatan
- Posisi terakhir sebagai *Vice President – Corporate Banking Segment Head* PT Bank Bali (1985-1991);
- *Deputy President Director* PT Bank Ekonomi Raharja Tbk (1991-2012);
- Komisaris PT Bank Ekonomi Raharja Tbk (2012);
- *President Director* PT Bank Agris Tbk (2012-2019); dan
- *Management Advisor* PT Bank IBK Indonesia Tbk (2019-2021).

Sertifikasi
Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2021-2023).

Penilaian Uji Kemampuan dan Kepatutan
Telah lulus *fit and proper test* dari Bank Indonesia tanggal 28 Oktober 2003.

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris lainnya, anggota Direksi, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

Basis of Appointment and Term of Office
Extraordinary GMS Resolutions dated 19 October 2022 (2022-2025).

Education
Bachelor of Business Administration from University of San Francisco (1985).

Concurrent Positions
In Bank Victoria:
Member of Nomination and Remuneration Committee of Bank Victoria (since 2022).

Outside of Bank Victoria:
Commissioner of PT Central Proteina Prima Tbk (since 2023).

History of Positions
- Last position as Vice President - Corporate Banking Segment Head of PT Bank Bali (1985-1991);
- Deputy President Director of PT Bank Ekonomi Raharja Tbk (1991-2012);
- Commissioner of PT Bank Ekonomi Raharja Tbk (2012);
- President Director of PT Bank Agris Tbk (2012-2019); and
- Management Advisor of PT Bank IBK Indonesia Tbk (2019-2021).

Certification
Risk Management Certification Level 5 from Banking Profession Certification Institute (2021-2023).

As Independent President Commissioner:
Passed the fit and proper test from the FSA on 28 October 2003.

Affiliation Relationship
Does not have any affiliation with other members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

Perubahan Komposisi Anggota Dewan Komisaris

Tidak terdapat perubahan anggota Dewan Komisaris Bank Victoria selama tahun buku 2023. Dengan demikian, susunan keanggotaan Dewan Komisaris meliputi:

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

Changes to the Composition of Board of Commissioners

There were no changes to the members of Board of Commissioners of Bank Victoria in the 2023 fiscal year. Thus, the composition of the Board of Commissioners includes:

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

Profil Direksi
Board of Directors Profile



ACHMAD FRISCANTONO

Direktur Utama
President Director

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
San Francisco

Usia
Age
62 tahun / years old

Domisili
Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025).

Riwayat Pendidikan
- *Bachelor of Science Degree in Agricultural Economics (Business and Industry)* dari University of Wisconsin, Madison (1987); dan
- *Master of Business Administration (Marketing)* dari City University, Seattle, Washington, USA (1989).

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak Ada.

Di luar Bank Victoria:
Tidak Ada.

Riwayat Jabatan
- *Senior Assistant Manager Divison Treasury* PT Bank Internasional Indonesia Tbk (1990-1994);
- *Manager Divison Treasury* PT Bank Namura Internusa (1994-1996);
- *Senior Manager Divison Treasury* dan *Divison International* PT Bank Rama Tbk (1996-2000);
- Kepala Risiko Likuiditas *(Senior Assistant Vice President)* Market dan Likuiditas Risiko Divisi PT Bank Danamon Indonesia Tbk (2000-2006);
- *Treasury and Financial Institution Head (Executive Vice President)* PT Bank Tabungan Pensiun Nasional Tbk (2006-2016); dan
- Komisaris Utama PT Bank Victoria Syariah (2019-2022).

Sertifikasi
Sertifikasi bidang Manajemen Risiko Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2022-2024).

Penilaian Uji Kemampuan dan Kepatutan
Telah lulus *fit and proper* test dari OJK tanggal 19 Oktober 2022.

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Direksi lainnya, anggota Dewan Komisaris, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

Basis of Appointment and Term of Office
Annual GMS Resolutions dated 3 June 2022 (2022-2025).

Education
- Bachelor of Science Degree in Agricultural Economics (Business and Industry) from University of Wisconsin, Madison (1987); and
- Master of Business Administration (Marketing) from City University, Seattle, Washington, USA (1989).

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Positions
- Senior Assistant Manager of Treasury Division of PT Bank Internasional Indonesia Tbk (1990-1994);
- Treasury Division Manager of PT Bank Namura Internusa (1994-1996);
- Senior Manager of Treasury Division and International Division of PT Bank Rama Tbk (1996-2000);
- Head of Market Liquidity Risk (Senior Assistant Vice President) and Division Liquidity Risk of PT Bank Danamon Indonesia Tbk (2000-2006);
- Treasury and Financial Institution Head (Executive Vice President) of PT Bank Tabungan Pensiun Nasional Tbk (2006-2016); and
- President Commissioner of PT Bank Victoria Syariah (2019-2022).

Certification
Risk Management Certification Level 5 from Banking Profession Certification Institute (2022-2024).

Fit and Proper Test
Passed the fit and proper test from the FSA on 19 October 2022.

Affiliation Relationship
Does not have any affiliation with other members of Board of Directors, members of Board of Commissioners, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.



RUSLI

Wakil Direktur Utama
Deputy President Director

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Tebing Tinggi

Usia
Age
52 tahun / years old

Domisili
Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
- Keputusan RUPS Luar Biasa tanggal 29 Februari 2016 (2016);
- Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019);
- Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022); dan
- Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025).

Riwayat Pendidikan
Insinyur jurusan Teknik Industri dari Universitas Trisakti (1993).

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak Ada.

Di luar Bank Victoria:
Tidak Ada.

Riwayat Jabatan
- Menjabat di PT Bank QNB Indonesia Tbk sebagai:
  - *Head of Treasury* (2000-2002);
  - Direktur *Treasury* (2002-2009);
  - Direktur Bisnis (2009-2012);
  - Direktur Operasional (2012-2016); dan
- Direktur Operasi dan Sistem Bank Victoria (2016).

Sertifikasi
- *Omega Credit Certification* (2015);
- Sertifikasi bidang *Treasury Dealer Level Advance* dari Lembaga Sertifikasi Profesi Perbankan (2021-2024); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2021-2023).

Penilaian Uji Kemampuan dan Kepatutan
Telah lulus *fit and proper test* dari OJK tanggal 16 September 2016.

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Direksi lainnya, anggota Dewan Komisaris, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

Basis of Appointment and Term of Office
- Extraordinary GMS Resolutions dated 29 February 2016 (2016);
- Annual GMS Resolutions dated 24 June 2016 (2016-2019);
- Annual GMS Resolutions dated 10 May 2019 (2019-2022); and
- Annual GMS Resolutions dated 3 June 2022 (2022-2025).

Education
Engineer of Industrial Engineering from Trisakti University (1993).

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Positions
- Held positions at PT Bank QNB Indonesia Tbk as:
  - Head of Treasury (2000-2002);
  - Director of Treasury (2002-2009);
  - Director of Business (2009-2012);
  - Director of Operations (2012-2016); and
- Director of Operations and Systems of Bank Victoria (2016).

Certification
- Omega Credit Certification (2015);
- Certification in Treasury Dealer Advanced Level from Banking Profession Certification Institute (2021-2024); and
- Certification in Banking Risk Management Level 5 from Banking Profession Certification Institute (2021-2023).

Fit and Proper Test
Passed the fit and proper test from the FSA on 16 September 2016.

Affiliation Relationship
Does not have any affiliation with other members of Board of Directors, members of Board of Commissioners, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.



LEMBING

Direktur Bisnis
Director of Business

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Pekanbaru

Usia
Age
59 tahun / years old

Domisili
Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
- Keputusan RUPS Tahunan tanggal 18 Mei 2018 (2018-2019);
- Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022); dan
- Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025).

Riwayat Pendidikan
Sarjana Ekonomi dari Universitas Tarumanegara (1989).

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak Ada.

Di luar Bank Victoria:
Tidak Ada.

Riwayat Jabatan
- *Branch Manager* Bank Lippo (1991-2004);
- Kepala Wilayah Jakarta dan Kalimantan Bank Lippo (2004-2008);
- *Small Medium Enterprise Head* Bank Danamon (2008-2009);
- *Small Medium Enterprise Head and Emerging Business* Maybank (2009-2012);
- Direktur PT Elang Kurnia Sakti (2012-2017);
- Direktur PT Agung Kimia Cemerlang (2012-2017);
- Komisaris PT Agung Kimia Cemerlang (2015-2017); dan
- *Small Medium Enterprise Head* Maybank (2017- 2018).

Sertifikasi
Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2022-2024).

Penilaian Uji Kemampuan dan Kepatutan
Telah lulus *fit and proper test* dari OJK tanggal 30 Oktober 2018.

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Direksi lainnya, anggota Dewan Komisaris, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

Basis of Appointment and Term of Office
- Annual GMS Resolutions dated 18 May 2018 (2018-2019);
- Annual GMS Resolutions dated 10 May 2019 (2019-2022); and
- Annual GMS Resolutions dated 3 June 2022 (2022-2025).

Education
Bachelor of Economic from Tarumanegara University (1989).

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Positions
- Branch Manager of Bank Lippo (1991-2004);
- Head of Jakarta and Kalimantan Regions of Bank Lippo (2004-2008);
- Small and Medium Enterprise Head of Bank Danamon (2008-2009);
- Small and Medium Enterprise Head and Emerging Business of Maybank (2009-2012);
- Director of PT Elang Kurnia Sakti (2012-2017);
- Director of PT Agung Kimia Cemerlang (2012-2017);
- Commissioner of PT Agung Kimia Cemerlang (2015-2017); and
- Small and Medium Enterprise Head of Maybank (2017-2018).

Certification
Risk Management Certification Level 5 from Banking Profession Certification Institute (2022-2024).

Fit and Proper Test
Passed the fit and proper test from the FSA on 30 October 2018.

Affiliation Relationship
Does not have any affiliation with other members of Board of Directors, members of Board of Commissioners, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.



DEBORA WAHJUTIRTO TANOYO

Direktur Keuangan
Director of Finance

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Surabaya

Usia
Age
38 tahun / years old

Domisili
Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
- Keputusan RUPS Tahunan tanggal 18 Mei 2018 (2018-2019);
- Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022); dan
- Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025).

Riwayat Pendidikan
- *Bachelor of Science* dari University of San Francisco, California (2006); dan
- *Master of Business Administration* dari University of San Fransisco, California (2009).

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak Ada.

Di luar Bank Victoria:
Tidak Ada.

Riwayat Jabatan
- *Assurance Staff* Burr Pilger and Mayer LLP, San Francisco (2007-2008);
- *Senior Associate* 2 Ernst and Young LLP, Singapore (2011-2013);
- *Finance Manager* PT Victoria Investama Tbk (2013-2014);
- Senior Staf Manajemen Risiko Bank Victoria (2014-2015);
- Direktur PT Victoria Investama Tbk (2014-2018); dan
- Komisaris Bank Victoria (2016-2018).

Sertifikasi
Sertifikasi bidang Manajemen Risiko Perbankan Level 5 dari Lembaga Sertifikasi Profesi Perbankan (2022-2024).

Penilaian Uji Kemampuan dan Kepatutan
Telah lulus *fit and proper test* dari OJK tanggal 22 November 2018.

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan Dewan Komisaris dan Direksi. Namun, memiliki hubungan afiliasi dengan Pemegang Saham Pengendali yaitu Suzanna Tanojo.

Basis of Appointment and Term of Office
- Annual GMS Resolutions dated 18 May 2018 (2018-2019);
- Annual GMS Resolutions dated 10 May 2019 (2019-2022); and
- Annual GMS Resolutions dated 3 June 2022 (2022-2025).

Education
- Bachelor of Science from University of San Fransisco, California (2006); and
- Master of Business Administration from University of San Fransisco, California (2009).

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Positions
- Assurance Staff of Burr Pilger and Mayer LLP, San Francisco (2007-2008);
- Senior Associate 2 of Ernst and Young LLP, Singapore (2011-2013);
- Finance Manager of PT Victoria Investama Tbk (2013-2014);
- Senior Staff of Risk Management of Bank Victoria (2014-2015);
- Director of PT Victoria Investama Tbk (2014-2018); and
- Commissioner of Bank Victoria (2016-2018).

Certification
Risk Management Certification Level 5 from Banking Profession Certification Institute (2022-2024).

Fit and Proper Test
Passed the fit and proper test from the FSA on 22 November 2018.

Affiliation Relationship
Does not have any affiliation with members of Board of Commissioners and members of Board of Directors. However, has affiliation with Controlling Shareholder, namely Suzanna Tanojo.



TAMUNAN

Direktur Kepatuhan dan Manajemen Risiko
Director of Compliance and Risk Management

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Banjarmasin

Usia
Age
58 tahun / years old

Domisili
Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
- Keputusan RUPS Tahunan tanggal 27 Juni 2008 (2008-2010);
- Keputusan RUPS Tahunan tanggal 25 Juni 2010 (2010-2013);
- Keputusan RUPS Tahunan tanggal 28 Juni 2013 (2013-2016);
- Keputusan RUPS Tahunan tanggal 24 Juni 2016 (2016-2019);
- Keputusan RUPS Tahunan tanggal 10 Mei 2019 (2019-2022); dan
- Keputusan RUPS Tahunan tanggal 3 Juni 2022 (2022-2025).

Riwayat Pendidikan
- Sarjana Ekonomi bidang Akuntansi dari Universitas Lambung Mangkurat, Banjarmasin (1990); dan
- Magister Manajemen bidang Manajemen Risiko dari Universitas Indonesia (2008).

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak Ada.

Di luar Bank Victoria:
Tidak Ada.

Riwayat Jabatan
- Staf Audit Kantor Akuntan Publik Drs. Santoso Banjarmasin (1987-1988);
- Kepala Bagian Administrasi dan Umum PT Winduintan Deltatama (Muda Jaya Group) Banjarmasin (1988-1990);
- Kepala Kantor Bank Andromeda (1990-1997);
- Kepala Kantor Bank Alfa, Menara Kebon Sirih (1997-1999);
- Staf Badan Penyehatan Perbankan Nasional (BPPN) (1999);
- Manajer Operasional PT Victoria Sekuritas (1999-2001);
- *Head of Operation and Compliance* PT Mahastra Capital (2001-2003); dan
- Direktur Operasi Bank Victoria (2007-2008).

Sertifikasi
- Sertifikasi bidang *Treasury Dealer Level Advance* dari Lembaga Sertifikasi Profesi Perbankan (2021- 2024);
- Sertifikasi bidang Manajemen Risiko Perbankan Level 7 dari Lembaga Sertifikasi Profesi Perbankan (2021-2023); dan
- Sertifikasi bidang *Compliance Level Advance* dari Lembaga Sertifikasi Profesi Perbankan (2021-2024).

Penilaian Uji Kemampuan dan Kepatutan
Telah lulus *fit and proper test* dari Bank Indonesia tanggal 24 Maret 2009.

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Direksi lainnya, anggota Dewan Komisaris, serta Pemegang Saham Utama dan Pengendali, baik langsung maupun tidak langsung sampai kepada pemilik individu.

Basis of Appointment and Term of Office
- Annual GMS Resolutions dated 27 June 2008 (2018-2010);
- Annual GMS Resolutions dated 25 June 2010 (2010-2013);
- Annual GMS Resolutions dated 28 June 2013 (2013-2016);
- Annual GMS Resolution dated 24 June 2016 (2016-2019);
- Annual GMS Resolutions dated 10 May 2019 (2019-2022); and
- Annual GMS Resolutions dated 3 June 2022 (2022-2025).

Education
- Bachelor of Economics in Accounting from Lambung Mangkurat University, Banjarmasin (1990); and
- Master of Management, majoring in Risk Management from Universitas Indonesia (2008).

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Positions
- Audit Staff of Public Accounting Firm of Drs. Santoso Banjarmasin (1987-1988);
- Head of Administration and General Affairs Department of PT Winduintan Deltatama (Muda Jaya Group), Banjarmasin (1988-1990);
- Office Head of Bank Andromeda (1990-1997);
- Office Head of Bank Alfa, Menara Kebon Sirih (1997-1999);
- Staff of Indonesian Bank Restructuring Agency (BPPN) (1999);
- Manager of Operations of PT Victoria Securities (1999-2001);
- Head of Operations and Compliance of PT Mahastra Capital (2001-2003); and
- Director of Operations of Bank Victoria (2007-2008).

Certification
- Certification in Treasury Dealer Advanced Level from Banking Profession Certification Institute (2021-2024);
- Certification in Banking Risk Management Level 7 from Banking Profession Certification Institute (2021-2023); and
- Certification in Compliance Advanced Level from Banking Profession Certification Institute (2021-2024).

Fit and Proper Test
Passed the fit and proper test from Bank Indonesia on 24 March 2009.

Affiliation Relationship
Does not have any affiliation with other members of Board of Directors, members of Board of Commissioners, and Main and Controlling Shareholders, either directly or indirectly up to the individual owners.

Perubahan Komposisi Anggota Direksi

Pada tahun 2023, tidak terdapat perubahan komposisi anggota Direksi Bank Victoria. Dengan demikian, susunan keanggotaan Direksi meliputi:

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

Changes to the Board of Directors' Composition

In 2023, there were no changes to the composition of the Board of Directors of Bank Victoria. Thus, the composition of the Board of Directors includes:

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



Profil Pejabat Eksekutif
Executive Officers Profile



1. **Muhammad Rakhmadhani**
   (Senior Executive Vice President(SEVP) of Change Management Office)
2. **Yohanes**
   Senior Executive Vice President (SEVP) of Operations & International Banking
3. **Mira Christiana**
   (Senior Executive Vice President (SEVP) of Business)
4. **Suryadi**
   (Senior Executive Vice President of Finance, Accounting & Management Information System)

Nama Name	Jabatan Position
Muhammad Rakhmadhani	Senior Executive Vice President of Change Management Office
Yohanes	Senior Executive Vice President of Operations & International Banking
Mira Christiana	Senior Executive Vice President of Business
Suryadi	Senior Executive Vice President of Finance, Accounting & Management Information System
Caprie Ardira Azhar	Kepala Divisi *Corporate Secretary* Head of Corporate Secretary Division
Djoko Soendjojo	Kepala Divisi SKAI & *Anti Fraud* Head of SKAI & Anti Fraud Division
RR Utami Tjipto	Kepala Divisi *Compliance & System Procedure* Head of Compliance & System Procedure
Sam R Soelaeman	Kepala Divisi *Risk Management/Integrated* Head of Risk Management/Integrated Division
Purwono	Kepala Divisi *International Banking* Head of International Banking Division
Ritayana	Kepala Divisi *Treasury* Head of Treasury Division
Theresia Maria Dhewajani	Kepala Divisi *Operations & Internal Control* Head of Operations & Internal Control Division
Yosef Sudikbyo	Kepala Divisi *Corporate Legal* Head of Corporate Legal Division
Novita Indriyani	Kepala Divisi *Credit Legal* Head of Credit Legal Division
Teguh Trisno Pambudi	Kepala Divisi *Credit Risk Review* Head of Credit Risk Review Division
David Fisher Kusnadi	Kepala Divisi SME & *Consumer Banking* Head of SME & Consumer Banking Division
Lanny Triwardhani	Kepala Divisi *Branch Banking Network & Digital Sales* Head of Branch Banking Network & Digital Sales Division
Andri Ramunanda	Kepala Divisi *Loan & Trade Operations* Head of Loan & Trade Operations Division
Sonny Andryano	Kepala Divisi *Special Assets Management* Head of Special Assets Management Division
Bambang F. Triatmojo	Wakil Kepala Departemen *Credit Monitoring & Collection* Vice Head of Credit Monitoring & Collection Department Division
Chairul Bahri	Kepala Departemen *Anti Money Laundering* (AML), *Counter Terorist Financing* (CTF) & *Weapon Mass Destruction* (WMD) Head of Anti Money-Laundering (AML), Counter-Terrorist Financing (CTF) & Weapon Mass Destruction (WMD)

Pendidikan dan/atau Pelatihan Pejabat Eksekutif

Education and/or Training of Executive Officers

Nama Name	Materi Material	
Muhammad Rakhmadhani **Senior Executive Vice President of Change Management Office**	1. *Asia Immersive Web3 Festival* (oleh Coinvestasi); 2. Aspek Hukum dan Dokumen Pembukaan Rekening Perusahaan (oleh Bank Victoria); 3. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 4. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 5. *Governance, Risk, & Compliance* (oleh Bank Victoria); 6. HPE CIC *Storage* (oleh Hewlett Packard Enterprise); 7. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 8. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 9. *Anti Fraud Management for Leaders Batch* 2 (oleh PT Kanatta Daya Indonesia); dan 10. *Refreshment* Pencegahan Tidak Pidana Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana).	1. Asia Immersive Web3 Festival (by Coinvestasi); 2. Legal Aspects and Documents for Opening a Company Account (by Bank Victoria); 3. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 4. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 5. Governance, Risk, & Compliance (by Bank Victoria); 6. HPE CIC Storage (by Hewlett Packard Enterprise); 7. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 8. Philosophy that Flows in My Soul (by Bank Victoria); 9. Anti Fraud Management for Leaders Batch 2 (by PT Kanatta Daya Indonesia); and 10. Refreshment of Prevention of Crimes of Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana).
Yohanes **Senior Executive Vice President of Operations & International Banking**	1. Aspek Hukum dan Dokumen Pembukaan Rekening Perusahaan (oleh Bank Victoria); 2. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 3. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 4. *Governance, Risk, and Compliance* (oleh Bank Victoria); 5. Meningkatkan Kolaborasi Perbankan dalam Rangka Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang dalam Penyelengaraan Pemilihan Umum dan Pemilihan Kepala Daerah yang Berintegritas serta Akuntabel (oleh Forum Komunikasi Direktur Kepatuhan); 6. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 7. *Refreshment* Tindak Pidana Pencucian Uang dan Pendanan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana); 8. Sertifikasi Sistem Pembayaran dan Pengelolaan Uang Rupiah (SPPUR) Transfer Dana Jenjang Eksekutif (oleh Lembaga Sertifikasi Profesi Perbankan); 9. *Sharing Session* Kepala Operasional (oleh Bank Victoria); 10. *Team Building* dan *Outbond*: *Together We Growth* (oleh Bank Victoria); dan 11. *Anti Fraud Management for Leaders Batch* 2 (oleh PT Kanatta Daya Indonesia).	1. Legal Aspects and Documents for Opening a Company Account (by Bank Victoria); 2. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 3. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 4. Governance, Risk, and Compliance (by Bank Victoria); 5. Increasing Banking Collaboration in the Context of Preventing and Eradicating the Crime of Money Laundering in Organizing General Elections and Regional Head Elections with Integrity and Accountability (by Communication Forum for Director of Banking Compliance); 6. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 7. Refreshment of Crimes of Money Laundering and Counter-Proliferation Financing of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana); 8. Payment System Certification and Rupiah Money Management (SPPUR) Fund Transfer in Executive Level (by Banking Professional Certification Institute); 9. Sharing Session of the Head of Operations (by Bank Victoria); 10. Team Building and Outbound: Together We Grow (by Bank Victoria); and 11. Anti Fraud Management for Leaders Batch 2 (by PT Kanatta Daya Indonesia).
Mira Christiana **Senior Executive Vice President of Business**	1. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 2. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 3. *Governance, Risk, & Compliance* (oleh Bank Victoria); 4. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 5. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 6. Urgensi Perpanjangan Kebijakan Restrukturisasi Kredit (oleh Lembaga Pengembangan Perbankan Indonesia); 7. *Anti Fraud Management for Leaders Batch* 2 (oleh PT Kanatta Daya Indonesia); dan 8. *Refreshment Credit* SME *Segmentation* (oleh Bank Victoria).	1. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, & Compliance (by Bank Victoria); 4. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 5. Philosophy that Flows in My Soul (by Bank Victoria); 6. Urgency for Extension of Credit Restructuring Policy (by the Indonesian Banking Development Institute); 7. Anti Fraud Management for Leaders Batch 2 (by PT Kanatta Daya Indonesia); and 8. Refreshment of Credit SME Segmentation (by Bank Victoria).

Nama Name	Materi Material	
Suryadi **Senior Executive Vice President of Finance, Accounting & Management Information System**	1. Undangan Sosialisasi *Resolution Plan* dan Premi Program Restrukturisasi Perbankan (PRP) (oleh Lembaga Penjamin Simpanan); 2. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); dan 3. *Induction Training Program* (oleh Bank Victoria).	1. Invitation for Dissemination of Resolution Plan and Banking Restructuring Program (PRP) Premiums (by Indonesia Deposit Insurance Corporation); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); and 3. Induction Training Program (by Bank Victoria).
Purwono **Kepala Divisi *International Banking*** Head of International Banking Division	1. *Coaching and Sharing* Kepala Operasional (oleh Bank Victoria); 2. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 3. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 4. *Governance, Risk, and Compliance* (oleh Bank Victoria); 5. *Team Building* dan *Outbond*: *Together We Growth* (oleh Bank Victoria); 6. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 7. *Outlook* Industri Jasa Keuangan di Tahun 2023 (oleh Otoritas Jasa Keuangan Institute); 8. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 9. *Refreshment* Pencegahan Tidak Pidana Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana); 10. Sosialisasi Kebijakan *Risk Register* (oleh Bank Victoria); 11. *Embracing the Digital Era: Exploring SWIFT Updates* 2023 (oleh Asosiasi SWIFT Indonesia); dan 12. *Anti Fraud Management for Leaders Batch* 3 (oleh PT Kanatta Daya Indonesia).	1. Coaching and Sharing of the Head of Operations (by Bank Victoria); 2. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 3. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 4. Governance, Risk, and Compliance (by Bank Victoria); 5. Team Building and Outbound: Together We Grow (by Bank Victoria); 6. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 7. Financial Services Industry Outlook in 2023 (by Otoritas Jasa Keuangan Institute); 8. Philosophy that Flows in My Soul (by Bank Victoria); 9. Refreshment of Prevention of Crimes of Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana); 10. Dissemination of Risk Register Policy (by Bank Victoria); 11. Embracing the Digital Era: Exploring SWIFT Updates 2023 (by Indonesian SWIFT Association); and 12. Anti Fraud Management for Leaders Batch 3 (by PT Kanatta Daya Indonesia).
Ritayana **Kepala Divisi *Treasury*** Head of Treasury Division	1. *Equity and Bonds Market Outlook*: Diskusi dan *Update* terkait Industri Reksa Dana (oleh PT Trimegah Sekuritas Indonesia Tbk); 2. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 3. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 4. *Governance, Risk, and Compliance* (oleh Bank Victoria); 5. Kode Etik, Peraturan Perizinan Wakil Perantara Pedagang Efek (WPPE), Manajemen Risiko, Teknikal Analis, Obligasi, dan Sukuk (oleh Perkumpulan Profesi Pasar Modal Indonesia); 6. *Market Insight* (oleh Bank Indonesia); 7. *Team Building* dan *Outbond*: *Working Together in Harmony* (oleh Bank Victoria); 8. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 9. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 10. Program Pendidikan Lanjutan Wakil Perantara Pedagang Efek (WPPE) (oleh Perkumpulan Profesi Pasar Modal Indonesia); 11. *Refreshment* Tindak Pidana Pencucian Uang dan Pendanaan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana); 12. Tren Perbankan di Tahun 2023 (oleh Otoritas Jasa Keuangan Institute); dan 13. *Anti Fraud Management for Leaders Batch* 2 (oleh PT Kanatta Daya Indonesia).	1. Equity and Bonds Market Outlook: Discussion and Updates of Mutual Fund Industry (by PT Trimegah Sekuritas Indonesia Tbk); 2. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 3. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 4. Governance, Risk, and Compliance (by Bank Victoria); 5. Code of Conduct, Licensing Regulations for Securities Broker-Dealer Representatives (WPPE), Risk Management, Technical Analysis, Bonds, and Sukuk (by the Indonesian Capital Market Professional Association); 6. Market Insight (by Bank Indonesia); 7. Team Building and Outbound: Working Together in Harmony (by Bank Victoria); 8. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 9. Philosophy that Flows in My Soul (by Bank Victoria); 10. Advanced Education Program of Securities Broker Representative (WPPE) (by the Indonesian Capital Market Professional Association); 11. Refreshment of Crimes of Money Laundering and Counter-Proliferation Financing of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana); 12. Trends in Banking in 2023 (by Otoritas Jasa Keuangan Institute); and 13. Anti Fraud Management for Leaders Batch 2 (by PT Kanatta Daya Indonesia).

Nama Name	Materi Material	
Theresia Maria Dhewajani **Kepala Divisi *Operations & Internal Control*** Head of Operations & Internal Control Division	1. Aspek Hukum dan Dokumen Pembukaan Rekening Perusahaan (oleh Internal Bank); 2. *Coaching & Sharing* Kepala Operasional (oleh Bank Victoria); 3. *Digital Culture Transformation* (oleh Ruang Damai Hening); 4. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 5. *Expert Sharing Session* – Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 6. *Governance, Risk, dan Compliance* (oleh Bank Victoria); 7. Meningkatkan Kolaborasi Perbankan dalam rangka Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang dalam Penyelengaraan Pemilihan Umum dan Pemilihan Kepala Daerah yang Berintegritas serta Akuntabel (oleh Forum Komunikasi Direktur Kepatuhan); 8. *Team Building* dan *Outbond*: *Together We Growth* (oleh Bank Victoria); 9. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 10. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 11. Sertifikasi Sistem Pembayaran dan Pengelolaan Uang Rupiah (SPPUR) Transfer Dana Jenjang Eksekutif (oleh Lembaga Sertifikasi Profesi Perbankan); 12. *Sharing Session* Kepala Operasional (oleh Bank Victoria); 13. ISO 27001 - Sistem Manajemen Keamanan Informasi (oleh Veda Praxis); 14. *Anti Fraud Management for Leaders Batch* 3 (oleh PT Kanatta Daya Indonesia); dan 15. *Refreshment* Pencegahan Tidak Pidana Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal Berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana).	1. Legal Aspects and Documents for Opening a Company Account (by Internal Bank); 2. Coaching & Sharing of the Head of Operations (by Bank Victoria); 3. Digital Culture Transformation (by Ruang Damai Hening); 4. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 5. Expert Sharing Session – Finance (by Otoritas Jasa Keuangan Institute); 6. Governance, Risk, and Compliance (by Bank Victoria); 7. Increasing Banking Collaboration in the context of Preventing and Eradicating the Crime of Money Laundering in Organizing General Elections and Regional Head Elections with Integrity and Accountability (by Communication Forum for Director of Banking Compliance); 8. Team Building and Outbound: Together We Grow (by Bank Victoria); 9. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 10. Philosophy that Flows in My Soul (by Bank Victoria); 11. Payment System Certification and Rupiah Money Management (SPPUR) Fund Transfer in Executive Level (by Banking Professional Certification Institute); 12. Sharing Session of the Head of Operations (by Bank Victoria); 13. ISO 27001 - Information Security Management Systems (by Veda Praxis); 14. Anti Fraud Management for Leaders Batch 3 (by PT Kanatta Daya Indonesia); and 15. Refreshment of Prevention of Crimes of Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana).
Yosef Sudikbyo **Kepala Divisi *Corporate Legal*** Head of Corporate Legal Division	1. Aspek Hukum dan Dokumen Pembukaan Rekening Perusahaan (oleh Bank Victoria); 2. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 3. *Expert Sharing Session* – Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 4. *Governance, Risk, and Compliance* (oleh Bank Victoria); 5. Kupas Tuntas Peraturan Menteri Agraria No. 3 Tahun 2023 tentang Penerbitan Dokumen Elektronik untuk Proses Pendaftaran Tanah (oleh Pengurus Wilayah Jawa Barat Ikatan Pejabat Pembuat Akta Tanah); 6. *Team Building* dan *Outbond*: *Working Together in Harmony* (oleh Bank Victoria); 7. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 8. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 9. *Anti Fraud Management for Leaders Batch* 2 (oleh PT Kanatta Daya Indonesia); dan 10. *Refreshment* Pencegahan Tidak Pidana Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana).	1. Legal Aspects and Documents for Opening a Company Account (by Bank Victoria); 2. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 3. Expert Sharing Session – Finance (by Otoritas Jasa Keuangan Institute); 4. Governance, Risk, and Compliance (by Bank Victoria); 5. Complete Explanation of Minister of Agrarian Regulation No. 3 of 2023 on Issuance of Electronic Documents for the Land Registration Process (by the West Java Regional Management of the Association of Land Deed Officials); 6. Team Building and Outbound: Working Together in Harmony (by Bank Victoria); 7. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 8. Philosophy that Flows in My Soul (by Bank Victoria); 9. Anti Fraud Management for Leaders Batch 2 (by PT Kanatta Daya Indonesia); and 10. Refreshment of Prevention of Crimes of Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana).

Nama Name	Materi Material	
Novita Indriyani **Kepala Divisi *Credit Legal*** Head of Credit Legal Division	1. Bedah Kasus Putusan Kasasi Mahkamah Agung terhadap Notaris Hartono atas Gugatan Pemalsuan Akta Jual Beli Saham (oleh Pengurus Pusat Ikatan Notaris Indonesia); 2. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 3. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 4. *Governance, Risk, and Compliance* (oleh Bank Victoria); 5. Kupas Tuntas Peraturan Menteri Agraria No. 3 Tahun 2023 tentang Penerbitan Dokumen Elektronik untuk Proses Pendaftaran Tanah (oleh Pengurus Wilayah Jawa Barat Ikatan Pejabat Pembuat Akta Tanah); 6. *Team Building* dan *Outbond*: SQEW (oleh Bank Victoria); 7. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 8. *Philosophy that Flows in My Soul* (oleh Bank Victoria); dan 9. *Anti Fraud Management for Leaders Batch* 3 (oleh PT Kanatta Daya Indonesia).	1. Case Review of the Supreme Court's Cassation Decision against Notary Hartono regarding the Lawsuit for Forgery of Share Sale and Purchase Deeds (by the Central Management of Indonesian Notary Association); 2. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 3. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 4. Governance, Risk, and Compliance (by Bank Victoria); 5. Complete Explanation of Minister of Agrarian Regulation No. 3 of 2023 on Issuance of Electronic Documents for the Land Registration Process (by the West Java Regional Management of the Association of Land Deed Officials); 6. Team Building and Outbound: SQEW (by Bank Victoria); 7. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 8. Philosophy that Flows in My Soul (by Bank Victoria); and 9. Anti Fraud Management for Leaders Batch 3 (by PT Kanatta Daya Indonesia).
Teguh Trisno Pambudi **Kepala Divisi *Credit Risk Review*** Head of Credit Risk Review Division	1. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 2. *Expert Sharing Session* – Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 3. *Governance, Risk, and Compliance* (oleh Bank Victoria); 4. *Team Building* dan *Outbond*: *Together We Growth* (oleh Bank Victoria); 5. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 6. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 7. *Refreshment* Pencegahan Tidak Pidana Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana); 8. Sosialisasi Kebijakan *Risk Register* (oleh Bank Victoria); 9. Urgensi Perpanjangan Kebijakan Restrukturisasi Kredit (oleh Lembaga Pengembangan Perbankan Indonesia); 10. *Anti Fraud Management for Leaders Batch* 3 (oleh PT Kanatta Daya Indonesia); 11. *Sharing Session Loan Admin* (oleh Bank Victoria); dan 12. *Refreshment Credit* SME *Segmentation* (oleh Bank Victoria).	1. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 2. Expert Sharing Session – Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Team Building and Outbound: Together We Grow (by Bank Victoria); 5. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 6. Philosophy that Flows in My Soul (by Bank Victoria); 7. Refreshment of Prevention of Crimes of Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana); 8. Dissemination of Risk Register Policy (by Bank Victoria); 9. Urgency for Extension of Credit Restructuring Policy (by the Indonesian Banking Development Institute); 10. Anti Fraud Management for Leaders Batch 3 (by PT Kanatta Daya Indonesia); 11. Sharing Session of Loan Admin (by Bank Victoria); and 12. Refreshment of Credit SME Segmentation (by Bank Victoria).
David Fisher Kusnadi **Kepala Divisi SME & *Consumer Banking*** Head of SME & Consumer Banking Division	1. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 2. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 3. *Governance, Risk, and Compliance* (oleh Bank Victoria); 4. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 5. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 6. *Refreshment* Tindak Pidana Pencucian Uang dan Pendanan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana); 7. Urgensi Perpanjangan Kebijakan Restrukturisasi Kredit (oleh Lembaga Pengembangan Perbankan Indonesia); 8. *Anti Fraud Management for Leaders Batch* 2 (oleh PT Kanatta Daya Indonesia); dan 9. *Refreshment Credit* SME *Segmentation* (oleh Bank Victoria).	1. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 5. Philosophy that Flows in My Soul (by Bank Victoria); 6. Refreshment of Crimes of Money Laundering and Counter-Proliferation Financing of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana); 7. Urgency for Extension of Credit Restructuring Policy (by the Indonesian Banking Development Institute); 8. Anti Fraud Management for Leaders Batch 2 (by PT Kanatta Daya Indonesia); and 9. Refreshment of Credit SME Segmentation (by Bank Victoria).

Nama Name	Materi Material	
Lanny Triwardhani **Kepala Divisi *Branch Banking Network & Digital Sales*** Head of Branch Banking Network & Digital Sales Division	1. *Induction Program* (oleh Bank Victoria); 2. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 3. Bank Victoria Mendukung Penuh Pemerintah dalam Mencegah Anti Pencucian Uang dan Pendanaan Terorisme (APU dan PPT) (oleh PT Andara Sarana); 4. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 5. *Anti Fraud Management for Leaders Batch* 2 (oleh PT Kanatta Daya Indonesia); 6. Sosialisasi Kebijakan *Risk Register* (oleh Bank Victoria); dan 7. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute).	1. Induction Program (by Bank Victoria); 2. Philosophy that Flows in My Soul (by Bank Victoria); 3. Bank Victoria Fully Supports the Government in the Prevention of Anti Money-Laundering and Counter-Terrorist Financing (AML and CFT) (by PT Andara Sarana); 4. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 5. Anti Fraud Management for Leaders Batch 2 (by PT Kanatta Daya Indonesia); 6. Dissemination of Risk Register Policy (by Bank Victoria); and 7. Expert Sharing Session – Sustainable Finance (by Otoritas Jasa Keuangan Institute).
Andri Ramunanda **Kepala Divisi *Loan & Trade Operations*** Head of Loan & Trade Operations Division	1. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 2. Bank Victoria Mendukung Penuh Pemerintah dalam Mencegah Anti Pencucian Uang dan Pendanaan Terorisme (APU dan PPT) (oleh PT Andara Sarana); 3. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 4. *Anti Fraud Management for Leaders Batch* 3 (oleh PT Kanatta Daya Indonesia); 5. *Sharing Session Loan Admin* (oleh Bank Victoria); 6. Sosialisasi Kebijakan *Risk Register* (oleh Bank Victoria); 7. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); dan 8. *Induction Training Program* (oleh Bank Victoria).	1. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 2. Bank Victoria Fully Supports the Government in the Prevention of Anti Money-Laundering and Counter-Terrorist Financing (AML and CFT) (by PT Andara Sarana); 3. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 4. Anti Fraud Management for Leaders Batch 3 (by PT Kanatta Daya Indonesia); 5. Sharing Session of Loan Admin (by Bank Victoria); 6. Dissemination of Risk Register Policy (by Bank Victoria); 7. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); and 8. Induction Training Program (by Bank Victoria).
Sonny Andryano **Kepala Divisi *Special Assets Management*** Head of Special Assets Management Division	1. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 2. Bank Victoria Mendukung Penuh Pemerintah dalam Mencegah Anti Pencucian Uang dan Pendanaan Terorisme (APU dan PPT) (oleh PT Andara Sarana); 3. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 4. *Anti Fraud Management for Leaders Batch* 3 (oleh PT Kanatta Daya Indonesia); 5. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); dan 6. *Induction Training Program* (oleh Bank Victoria).	1. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 2. Bank Victoria Fully Supports the Government in the Prevention of Anti Money-Laundering and Counter-Terrorist Financing (AML and CFT) (by PT Andara Sarana); 3. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 4. Anti Fraud Management for Leaders Batch 3 (by PT Kanatta Daya Indonesia); 5. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); and 6. Induction Training Program (by Bank Victoria).
Bambang F. Triatmojo **Wakil Kepala Departemen *Credit Monitoring & Collection*** Vice Head of Credit Monitoring & Collection Department	1. Urgensi Perpanjangan Kebijakan Restrukturisasi Kredit (oleh Lembaga Pengembangan Perbankan Indonesia); 2. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 3. *Governance, Risk, and Compliance* (oleh Bank Victoria); 4. *Liquidity Coverage Ratio* (LCR) dan *Net Stable Funding Ration* (NSFR), Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 dan Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 (oleh Risiko Manajemen Gagasan); 5. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 6. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 7. *Anti Fraud Management for Leaders Batch* 3 (oleh PT Kanatta Daya Indonesia); 8. *Refreshment* Pencegahan Tidak Pidana Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana); 9. Sosialisasi Kebijakan *Risk Register* (oleh Bank Victoria); dan 10. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute).	1. Urgency for Extension of Credit Restructuring Policy (by the Indonesian Banking Development Institute); 2. Philosophy that Flows in My Soul (by Bank Victoria); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Liquidity Coverage Ratio (LCR) and Net Stable Funding Ration (NSFR), Financial Services Authority Regulation No. 42/POJK.03/2015 and Financial Services Authority Regulation No. 50/POJK.03/2017 (by Risk Management Guard); 5. Outlook Banking Regulation: Banking Industry Challenges, Regulatory Direction, and Future Banking (by the Indonesian Banking Development Institute); 6. Expert Sharing Outlook Banking Regulation (by the Indonesian Banking Development Institute); 7. Anti Fraud Management for Leaders Batch 3 (by PT Kanatta Daya Indonesia); 8. Refreshment of Prevention of Crimes of Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana); 9. Dissemination of Risk Register Policy (by Bank Victoria); and 10. Expert Sharing Session – Sustainable Finance (by Otoritas Jasa Keuangan Institute).

Nama Name	Materi Material	
Chairul Bahri **Kepala Departemen *Anti Money Laundering* (AML), *Counter Terorist Financing* (CTF) & *Weapon Mass Destruction* (WMD)** Head of Anti Money-Laundering (AML), Counter-Terrorist Financing (CFT) & Weapon Mass Destruction (WMD)	1. *Governance, Risk, and Compliance* (oleh Bank Victoria); 2. Meningkatkan Kolaborasi Perbankan dalam Rangka Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang dalam Penyelengaraan Pemilihan Umum dan Pemilihan Kepala Daerah yang Berintegritas serta Akuntabel (oleh Forum Komunikasi Direktur Kepatuhan); 3. *Team Building* dan *Outbond*: *Change the Future* (oleh Bank Victoria); 4. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 5. *Refreshment* Pencegahan Tidak Pidana Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana); 6. *Anti Fraud Management for Leaders Batch* 3 (oleh PT Kanatta Daya Indonesia); dan 7. Penyusunan Individual *Risk Assessment* (IRA) sesuai Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 terkait Anti Pencucian Uang dan Pendanaan Terorisme (APU dan PPT) (oleh Equivalent Training Center).	1. Governance, Risk, and Compliance (by Bank Victoria); 2. Increasing Banking Collaboration in the Context of Preventing and Eradicating the Crime of Money Laundering in Organizing General Elections and Regional Head Elections with Integrity and Accountability (by Communication Forum for Director of Banking Compliance); 3. Team Building and Outbound: Change the Future (by Bank Victoria); 4. Philosophy that Flows in My Soul (by Bank Victoria); 5. Refreshment of Prevention of Crimes of Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana); 6. Anti Fraud Management for Leaders Batch 3 (by PT Kanatta Daya Indonesia); and 7. Preparation of Individual Risk Assessment (IRA) in accordance with Financial Services Authority Regulation No. 8 of 2023 on Anti-Money Laundering and Counter-Terrorist Financing (AML and CFT) (by Equivalent Training Center).

Profil Kepala Kantor Cabang Utama
Profile of Main Branch Office Head

Jane Alexandra Herman
Kepala KCU BIP
Head of BIP Main Branch Office

I Gusti Putu Sindara Sastrawan
Kepala KCU Bali
Head of Bali Main Branch Office

Theresia Sri Pakarti
Kepala KCU Bandung
Head of Bandung Main Branch Office

Rosita B. Rajaisun
Kepala KCU Bogor
Head of Bogor Main Branch Office

Amelia
Kepala KCU Cideng
Head of Cideng Main Branch Office

Dedy Kurnia Santosa
Kepala KCU Fatmawati
Head of Fatmawati Main Branch Office

Armand Kusuma
Kepala KCU Kelapa Gading
Head of Kelapa Gading Main Branch Office

Tony Utomo
Kepala KCU Makassar
Head of Makassar Main Branch Office

Daisy Merry Natalia Frederik
Kepala KCU Manado
Head of Manado Main Branch Office

Wiwi Candra
Kepala KCU Medan
Head of Medan Main Branch Office

Tjoe Dedy Himawan
Kepala KCU Semarang
Head of Semarang Main Branch Office

Franky Lazuardi
Kepala KCU Senayan
Head of Senayan Main Branch Office

Febyra Asia Rini
Kepala KCU Solo
Head of Solo Main Branch Office

Erli Nornawati
Kepala KCU Surabaya
Head of Surabaya Main Branch Office

Komposisi Pemegang Saham
Shareholders Composition

Uraian Desciption	31 Desember 2023 31 December 2023			1 Januari 2023 1 January 2023		
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total (Rp)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total (Rp)
Saham dengan Sertifikat Kolektif / Shares with Collective Certificates						
Pemegang Saham Pendiri Founders Shares	-	-	-	-	-	-
Masyarakat Public						
Pemodal Nasional National Investor						
5% atau lebih 5% or more	-	-	-	-	-	-
Lainnya Others	1,165,500	0.01	116,550,000	1,165,500	0.01	116,550,000
Pemodal Asing Foreign Investors						
5% atau lebih 5% or more	-	-	-	-	-	-
Lainnya Others	24,500	0.00	2,450,000	24,500	0.00	2,450,000
Sub Total	1,190,000	0.01	119,000,000	**1,190,000**	**0.01**	**119,000,000**
Saham dengan Penitipan Kolektif PT Kustodian Sentral Efek Indonesia / Shares in Collective Custody with PT Kustodian Sentral Efek Indonesia						
Pemegang Saham Pendiri Founders Shares						
PT Nata Patindo	48,823,665	0.31	4,882,366,500	48,823,665	0.31	4,882,366,500
Masyarakat Public						
Pemodal Nasional National Investor						
5% atau lebih 5% or more						
Suzanna Tanojo	3,066,411,303	19.35	306,641,130,300	3,066,411,303	19.35	306,641,130,300
PT Victoria Investama Tbk	7,010,537,747	44.24	701,053,774,700	6,880,162,747	43.41	688,016,274,700
Lainnya Others	3,464,036,873	21.86	346,403,687,300	3,358,963,409	21.19	335,896,340,900
Pemodal Asing Foreign Investors						
5% atau lebih 5% or more						
Chemical Asia Corporation Pte Ltd	-	-	-	871,275,600	5.50	87,127,560,000
Lainnya Others	2,257,236,190	14.24	225,723,619,000	1,621,407,990	10.23	162,140,799,000
Sub Total	15,847,045,778	99.99	1,584,704,577,800	**15,847,044,714**	**99.99**	**1,584,704,471,400**
Total	15,848,235,778	100.00	1,584,823,577,800	**15,848,234,714**	**100.00**	**1,584,823,471,400**

Komposisi Pemegang Saham yang Memiliki 5% atau Lebih Saham

Composition of Shareholders with 5% or More Shares

Uraian Desciption	31 Desember 2023 31 December 2023		1 Januari 2023 1 January 2023	
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)
PT Victoria Investama Tbk	7,010,537,747	44.24	6,880,162,747	43.41
Suzanna Tanojo	3,066,411,303	19.35	3,066,411,303	19.35
Chemical Asia Corporation Pte Ltd	-*	-*	871,275,600	5.50
Total	10,076,949,050	63.58	**10,817,849,650**	**68.26**

* Per 31 Desember 2023, kepemilikan saham kurang dari 5%. / As of 31 December 2023, share ownership was less than 5%.

Kepemilikan Saham Langsung dan Tidak Langsung atas Saham Bank Victoria oleh Anggota Dewan Komisaris dan Direksi

Direct and Indirect Share Ownership of Bank Victoria's Shares by Members of Board of Commissioners and Board of Directors

Pada awal dan akhir tahun 2023, seluruh anggota Dewan Komisaris dan Direksi yang menjabat tidak memiliki saham baik secara langsung ataupun tidak langsung di Bank Victoria.

At the beginning and end of 2023, all serving members of the Board of Commissioners and Board of Directors did not own any shares, either directly or indirectly, in Bank Victoria.

Komposisi Pemegang Saham Masyarakat dengan Kepemilikan Saham Masing-Masing Kurang dari 5%

Composition of Public Shareholders with Share Ownership of Less than 5% Each

Uraian	31 Desember 2023 / 31 December 2023		1 Januari 2023 / 1 January 2023		Desciption
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	
Pemodal Nasional / National Investors					
Perorangan	1,300,561,817	8.21	1,308,699,563	8.26	Individuals
Perseroan Terbatas	1,611,822,654	10.17	1,208,111,454	7.62	Limited Liability Companies
Asuransi	281,340,000	1.78	281,340,000	1.78	Insurance
Reksa Dana	15,000	0.00	15,000	0.00	Mutual Funds
Broker	320,286,567	2.02	610,786,557	3.85	Broker
Pemodal Asing / Foreign Investors					
Perorangan	245,660,115	1.55	242,444,415	1.53	Individuals
Institusi Asing	2,011,600,575	12.69	1,378,988,075	8.70	Foreign Institutions
Total	5,771,286,728	36.42	**5,030,385,064**	**31.74**	Total

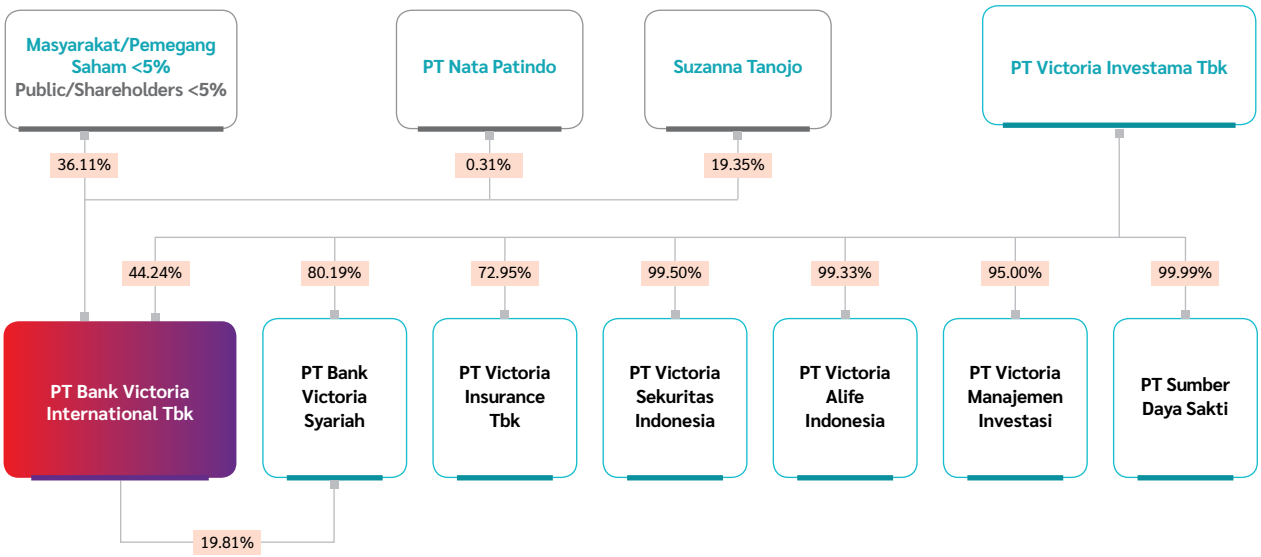
Komposisi Pemegang Saham Berdasarkan Status Kepemilikan

Shareholders Composition by Ownership Status

Uraian	31 Desember 2023 / 31 December 2023			1 Januari 2023 / 1 January 2023			Desciption
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Investor	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Investor	
Scriptless							
Pemodal Nasional							National Investors
Perorangan	4,365,911,120	27.55	7,862	4,374,048,866	27.60	9,268	Individuals
Perseroan Terbatas	8,622,359,901	54.41	30	8,088,273,701	51.04	31	Limited Liability Companies
Broker	320,286,567	2.02	7	610,786,557	3.85	6	Broker
Asuransi	281,252,000	1.77	3	281,252,000	1.77	3	Insurance

Uraian	31 Desember 2023 31 December 2023			1 Januari 2023 1 January 2023			Desciption
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Investor	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Investor	
Pemodal Asing							Foreign Investors
Perorangan	245,635,615	1.55	10	242,419,915	1.53	11	Individual
Institusi Asing	2,011,600,575	12.69	21	2,250,263,675	14.20	20	Foreign Institutions
Script							
Pemodal Nasional							National Investors
Perorangan	1,062,000	0.01	132	1,062,000	0.01	132	Individuals
Perseroan Terbatas	500	0.00	1	500	0.00	1	Limited Liability Companies
Reksa Dana	15,000	0.00	1	15,000	0.00	1	Mutual Fund
Asuransi	88,000	0.00	3	88,000	0.00	3	Insurance
Pemodal Asing							Foreign Investors
Perorangan	24,500	0.00	7	24,500	0.00	7	Individual
Institusi Asing	-	-	-	-	-	-	Foreign Institutions
Total	**15,848,235,778**	**100.00**	**8,077**	**15,848,234,714**	**100.00**	**9,483**	**Total**

Struktur Pemegang Saham Utama dan Pengendali
Main and Controlling Shareholders Structure



Berdasarkan struktur Pemegang Saham Utama dan Pengendali Bank, PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Perseroan, sedangkan penerima manfaat akhir adalah Suzanna Tanojo.

Based on Main and Controlling Shareholders structure of the Bank, PT Victoria Investama Tbk is the Company's Controlling Shareholder, while the ultimate beneficiary is Suzanna Tanojo.

Infomasi Entitas Anak, Perusahaan Asosiasi, Perusahaan Ventura Bersama, dan *Special Purpose Vehicle*

Information on Subsidiaries, Associated Entities, Joint Venture Companies, and Special Purpose Vehicles

Pada tahun 2023, Bank Victoria tidak memiliki Entitas Anak, perusahaan ventura bersama, dan *special purpose vehicle,* namun memiliki 1 Entitas Asosiasi. Informasi terkait Entitas Asosiasi Bank diuraikan sebagai berikut.

In 2023, Bank Victoria did not have any Subsidiary, joint venture company, and special purpose vehicle, but had 1 Associated Entity. Information on the Bank's Associated Entity is described as follows.

PT Bank Victoria Syariah	
Alamat Address	Gedung Graha BIP Lt. 5 Jl. Gatot Subroto Kav. 23 Karet Semanggi, Setiabudi Jakarta Selatan 12930 T : (021) 5600 467 (021) 5225 285 (*Hunting*) F : (021) 5664 247 E : corsec@bankvictoriasyariah.co.id W : www.bankvictoriasyariah.co.id
Bidang Usaha Line of Businwess	Perbankan Syariah Sharia Banking
Tahun Beroperasi Year of Operations	Beroperasi sejak 1966 Has been in operation since 1966
Domisili Domicile	Jakarta
Total Aset (dalam juta Rupiah) Total Assets (in million Rupiah)	3,082,279
Kepemilikan Saham (%) Share Ownership (%)	19.81

Kronologi Pencatatan Saham
Chronology of Share Listing

Kronologi pencatatan saham Bank Victoria yang dimulai sejak Penawaran Umum Perdana Saham sampai dengan tanggal 31 Desember 2023 diuraikan sebagai berikut:

The chronology of Bank Victoria's share listing from the Initial Public Offering to 31 December 2023 is described as follows:

Uraian Description	Tanggal Pelaksanaan Exercise Date	Jumlah Saham yang Diterbitkan (Lembar Saham) Total Issued Shares (Number of Shares)	Nilai Nominal Nominal Value (Rp)	Harga Penawaran Offering Price (Rp)	Jumlah Saham Beredar (Lembar Saham) Total Outstanding Shares (Number of Shares)
Saham Pendiri Founders' Shares		250,000,000	100	-	250,000,000
Saham dari Kapitalisasi Saldo Laba Shares from Capitalization of Retained Earnings		34,000,000	100	-	284,000,000
Penawaran Umum Perdana Saham Initial Public Offering	1999	250,000,000	100	100	534,000,000
Penawaran Umum Terbatas I dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering I with Preemptive Rights	2000	100,000,000	100	115	634,000,000
Pelaksanaan Waran Seri I dan II Exercise of Series I and II Warrants	2002	66,793,400	100	-	700,793,400
Penawaran Umum Terbatas II dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering II with Preemptive Rights	2003	400,000,000	100	100	1,100,793,400
Pelaksanaan Waran Seri III Exercise of Series III Warrants	2004	193,799,960	100	-	1,294,593,360
Pelaksanaan Waran Seri III Exercise of Series III Warrants	2006	46,200,000	100	-	1,340,793,360
Penawaran Umum Terbatas III dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering III with Preemptive Rights	2006	670,363,760	100	100	2,011,157,120
Pelaksanaan Waran Seri IV Exercise of Series IV Warrants	2007	323,840,000	100	100	2,334,997,120
Penawaran Umum Terbatas IV dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering IV with Preemptive Rights	2008	1,167,498,560	100	100	3,502,495,680
Pelaksanaan Waran Seri IV dan V Exercise of Series IV and V Warrants	2009	344,244,500	100	100	3,846,740,180
Pelaksanaan Waran Seri IV dan V Exercise of Series IV and V Warrants	2010	249,707,135	100	100	4,096,447,315
Penawaran Umum Terbatas V dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering V with Preemptive Rights	2011	1,954,919,259	100	100	6,051,366,574
Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu Issuance of Shares Without Preemptive Rights	2011	414,580,000	100	100	6,465,946,574
Pelaksanaan Waran Seri IV dan VI Exercise of Series IV and VI Warrants	2011	81,724,314	100	100	6,547,670,888
Pelaksanaan Waran Seri V dan VI Exercise of Series V and VI Warrants	2012	56,673,554	100	100	6,604,344,442
Pelaksanaan Waran Seri V dan VI Exercise of Series V and VI Warrants	2013	25,923,831	100	100	6,630,268,273

Uraian Description	Tanggal Pelaksanaan Exercise Date	Jumlah Saham yang Diterbitkan (Lembar Saham) Total Issued Shares (Number of Shares)	Nilai Nominal Nominal Value (Rp)	Harga Penawaran Offering Price (Rp)	Jumlah Saham Beredar (Lembar Saham) Total Outstanding Shares (Number of Shares)
Pelaksanaan Waran Seri VI Exercise of Series VI Warrants	2014	508,898,707	100	100	7,139,166,980
Pelaksanaan Waran Seri VI Exercise of Series VI Warrants	2015	300	100	100	7,139,167,280
Pelaksanaan Waran Seri VI Exercise of Series VI Warrants	2016	751,486,547	100	100	7,890,653,827
Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase Without Preemptive Rights	2016	780,394,335	100	100	8,671,048,162
Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase Without Preemptive Rights	2019	280,898,877	100	356	8,951,947,039
Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase Without Preemptive Rights	2021	586,205,939	100	160	9,538,152,978
Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase Without Preemptive Rights	2021	948,979,590	100	196	10,487,132,568
Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu Capital Increase with Preemptive Rights	2022	2,553,461,919	100	150	13,040,594,487
Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu Capital Increase with Preemptive Rights	2022	2,807,640,227	100	150	15,848,234,714
Pelaksanaan Waran Seri VII Exercise of Series VII Warrants	2023	1,064	100	100	**15,848,235,778**
Total Modal Saham yang Ditempatkan dan Disetor Penuh **Total Fully Issued and Paid-Up Share Capital**					**15,848,235,778**

Keterangan: Seluruh penerbitan saham Bank Victoria dicatatkan pada Bursa Efek Indonesia.
Remark: All Bank Victoria share issuances are listed on Indonesia Stock Exchange.

Kronologi Pencatatan Efek Lainnya
Chronology of Other Securities Listing

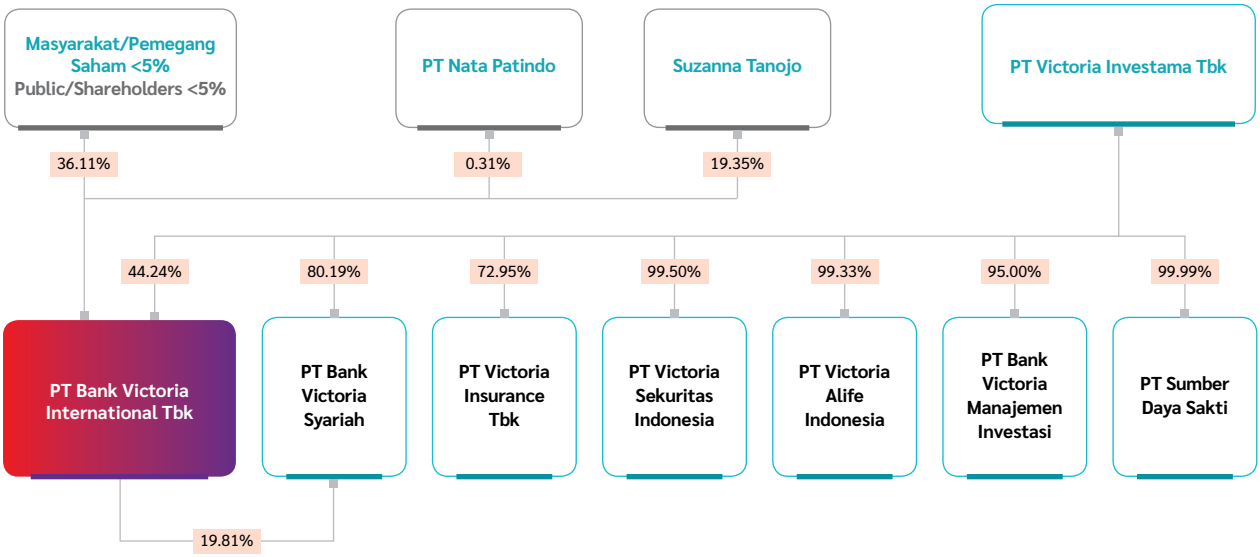
Uraian Description	Total (juta Rupiah) Total (million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Date	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status	
							Lunas Paid	Belum Lunas Not Paid
Obligasi Bank Victoria I Tahun 2000 dengan tingkat suku bunga tetap Seri A Bank Victoria Series A Bond I of 2000 at fixed interest rate	75,000	7	16.25	3 Maret 2000-3 Maret 2007 3 March 2000-3 March 2007	BBB+	BBB+	✓	
Obligasi Bank Victoria I Tahun 2000 dengan tingkat suku bunga mengambang Seri B Bank Victoria Series B Bond I of 2000 at floating interest rate	25,000	7	16,00 (kupon bunga ke-1 dan 2) serta mengambang (kupon bunga ke-3 sampai ke-28) 16.00 (1st and 2nd interest coupon) and floating (3rd to 28th interest coupon)	3 Maret 2000-3 Maret 2007 3 March 2000-3 March 2007	BBB+	BBB+	✓	

Uraian Description	Total (juta Rupiah) Total (million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Date	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status	
							Lunas Paid	Belum Lunas Not Paid
Obligasi Bank Victoria II Tahun 2007 dengan tingkat suku bunga tetap Bank Victoria Bond II of 2007 at fixed interest rate	200,000	5	12.00	21 Maret 2007-21 Maret 2012 21 March 2007-21 March 2012	A3.id (setara A-. Kasnic / equal to A-. Kasnic)	A3.id (setara A-. Kasnic / equal to A-. Kasnic)	✓	
Obligasi Subordinasi Bank Victoria I Tahun 2007 dengan tingkat suku bunga tetap Bank Victoria Subordinated Bond I of 2007 at fixed interest rate	200,000	10	12,50 (tahun ke-1 sampai ke-5) serta 21,50 (tahun ke-6 sampai ke-10) 12.50 (1st year to 5th year) and 21.50 (6th year to 10th year)	21 Maret 2007-21 Maret 2017 21 March 2007-21 March 2017	Baa2.id (setara BBB. Kasnic / equal to BBB. Kasnic)	Baa2.id (setara BBB. Kasnic / equal to BBB. Kasnic)	✓	
Obligasi Bank Victoria III Tahun 2012 dengan tingkat suku bunga tetap Bank Victoria Bond III of 2012 at fixed interest rate	200,000	5	10.00	27 Juni 2012-27 Juni 2017 27 June 2012-27 June 2017	idBBB+ (*Triple* B Plus)	idBBB+ (*Triple* B Plus)	✓	
Obligasi Subordinasi Bank Victoria II Tahun 2012 dengan tingkat suku bunga tetap Bank Victoria Subordinated Bond II of 2012 at fixed interest rate	300,000	7	11.00	27 Juni 2012-27 Juni 2019 27 June 2012-27 June 2019	idBBB+ (*Triple* B Plus)	idBBB+ (*Triple* B Plus)	✓	
Obligasi Bank Victoria IV Tahun 2013 dengan tingkat suku bunga tetap Bank Victoria Bond IV of 2013 at fixed interest rate	200,000	5	9.50	27 Juni 2013-27 Juni 2018 27 June 2013-27 June 2018	idA- (*Single* A Minus)	idA- (*Single* A Minus)	✓	
Obligasi Subordinasi Bank Victoria III Tahun 2013 dengan tingkat suku bunga tetap Bank Victoria Subordinated Bond III of 2013 at fixed interest rate	300,000	7	10.50	27 Juni 2013-27 Juni 2020 27 June 2013-27 June 2020	idBBB+ (*Triple* B Plus)	idBBB+ (*Triple* B Plus)	✓	
Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dengan tingkat suku bunga tetap Bank Victoria Continuous Bond I Phase I of 2017 at fixed interest rate	300,000	5	10.30	11 Juli 2017-11 Juli 2022 11 July 2017-11 July 2022	idA- (*Single* A Minus)	idA- (*Single* A Minus)	✓	
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dengan tingkat suku bunga tetap Bank Victoria Continuous Subordinated Bond I Phase I of 2017 at fixed interest rate	50,000	7	11.00	11 Juli 2017-11 Juli 2024 11 July 2017-11 July 2024	idBBB (*Triple* B)	idBBB (*Triple* B)		✓
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat suku bunga tetap Seri A Bank Victoria Series A Continuous Bond I Phase II of 2018 at fixed interest rate	100,000	3	9.70	5 Juni 2018-5 Juni 2021 5 June 2018-5 June 2021	idA- (*Single* A Minus)	idA- (*Single* A Minus)	✓	
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat suku bunga tetap Seri B Bank Victoria Series B Continuous Bond I Phase II of 2018 at fixed interest rate	200,000	5	10.30	5 Juni 2018-5 Juni 2023 5 June 2018-5 June 2023	idA- (*Single* A Minus)	idA- (*Single* A Minus)	✓	
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat suku bunga tetap Bank Victoria Continuous Subordinated Bond I Phase II of 2018 at fixed interest rate	350,000	7	11.00	5 Juni 2018-5 Juni 2025 5 June 2018-5 June 2025	idBBB (*Triple* B)	idBBB (*Triple* B)		✓

Uraian Description	Total (juta Rupiah) Total (million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Date	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status	
							Lunas Paid	Belum Lunas Not Paid
Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 Bank Victoria Continuing Bonds II Phase I Year 2019	100,000	2	9.75	28 Juni 2019-28 Juni 2021 28 June 2019-28 June 2021	idA- (*Single* A Minus)	idA- (*Single* A Minus)	✓	
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 Bank Victoria Continuing Subordination Bonds II Phase I Year 2019	250,000	7	11.75	28 Juni 2019-28 Juni 2026 28 June 2019-28 June 2026	idBBB (*Triple* B)	idBBB (*Triple* B)		✓
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 Bank Victoria Continuing Subordination Bonds II Phase II Year 2019	150,000	7	11.25	8 November 2019-8 November 2026 8 November 2019-8 November 2026	idBBB (*Triple* B)	idBBB (*Triple* B)		✓
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 Bank Victoria Continuing Subordination Bonds II Phase III Year 2020	60,000	7	11.25	1 April 2020-1 April 2027 1 April 2020-1 April 2027	idBBB (*Triple* B)	idBBB (*Triple* B)		✓
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 dengan tingkat bunga tetap Seri A Bank Victoria Series A Continuing Bonds III Phase I Year 2023 at fixed interest rate	300,000	3	9.25	9 Maret 2023-9 Maret 2026 9 March 2023-9 March 2026	idA- (*Single* A Minus)	idA- (*Single* A Minus)		✓
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 dengan tingkat bunga tetap Seri B Bank Victoria Series B Continuing Bonds III Phase I Year 2023 at fixed interest rate	200,000	5	10.25	9 Maret 2023-9 Maret 2028 9 March 2023-9 March 2028	idA- (*Single* A Minus)	idA- (*Single* A Minus)		✓

Keterangan *rating* / Rating description:
* BBB+ dari PT Kasnic Duff dan Phelps Credit Rating Indonesia / BBB+ from PT Kasnic Duff and Phelps Credit Rating Indonesia
* A3.id dari PT Moody's Indonesia (setara A-. Kasnic) / A3.id from PT Moody's Indonesia (equal to A-. Kasnic)
* Baa2.id dari PT Moody's Indonesia (setara BBB. Kasnic) / Baa2.id from PT Moody's Indonesia (equal to BBB. Kasnic)
* idBBB+ (*Triple* B) dari PT Pemeringkat Efek Indonesia / idBBB + (Triple B) from PT Pemeringkat Efek Indonesia
* idA- (*Single* A Minus) dari PT Pemeringkat Efek Indonesia / idA- (Single A Minus) from PT Pemeringkat Efek Indonesia
* idBBB (*Triple* B) dari PT Pemeringkat Efek Indonesia / idBBB (Triple B) from PT Pemeringkat Efek Indonesia

Struktur Grup
Structure Group



Informasi Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik
Information on the Use of Public Accountant Services and Public Accounting Firms

Kantor Akuntan Publik Public Accounting Firm	Kantor Akuntan Publik Purwanto, Sungkoro & Surja (*Member of Ernst & Young*) Purwanto, Sungkoro & Surja Public Accounting Firm (Member of Ernst & Young)	
Alamat Address	**Jasa yang Diberikan** Services Provided	
Indonesia Stock Exchange Building Tower 2 Lt. 7 Jl. Jend. Sudirman Kav. 52-53 Jakarta 12190 T : (021) 5289 5000 F : (021) 5289 4100 W : ey.com/id	**Audit:** Audit Laporan Keuangan tahun buku 2023 (tanpa jasa non-audit). Audit of Financial Statements for 2023 fiscal year (without non-audit services).	
Nama Akuntan Publik Name of Public Accountant	**Periode Penugasan** Assignment Period	**Biaya Jasa (Rp)** Services Fee (Rp)
Yovita	2023	1,650,000,000

Lembaga dan Profesi Penunjang Pasar Modal
Capital Market Supporting Institutions and Professionals

Uraian Description	Nama Name	Alamat Address	Jasa yang Diberikan Services Provided	Biaya Jasa Services Fee (Rp)
Biro Administrasi Efek Share Registrar Bureau	PT Adimitra Jasa Korpora	Rukan Kirana Boutiqe Office Jl. Kirana Avenue III Blok F3 No. 5 Kelapa Gading Jakarta Utara 14250 T : (021) 2974 5222 F : (021) 2928 9961 E : opr@adimitra-jk.co.id W : www.adimitrajk.co.id	Jasa Administrasi Daftar Pemegang Saham dan Administrasi Waran No. AF088/BVIC/032023 dan No. PW-145/BVIC/092022. Shareholder Registration and Warrant Administration Services No. AF088/BVIC/032023 and No. PW-145/BVIC/092022.	46,000,000
Pencatatan Efek Securities Listing	Bursa Efek Indonesia Indonesia Stock Exchange	Indonesia Stock Exchange Building Tower I Jl. Jend. Sudirman Kav. 52-53 Jakarta Selatan 12190 T : (021) 5150 515 F : (021) 5150 330 W : www.idx.co.id	Pencatatan Tahunan Saham dan/atau Efek Bersifat Utang dan Sukuk. Annual Listing of Shares and/or Debt Securities and Sukuk.	256,500,000
Notaris Notary	Fathiah Helmi, SH	Graha Irama Lt. 6C Jl. HR Rasuna Said Kav. 1–2 Jakarta 12950 T : (021) 5290 7304 (021) 5290 7305 (021) 5290 7306 F : (021) 5261 136 E : fhchozie@gmail.com	Pembuatan Akta Berita Acara dan Akta Pernyataan Keputusan RUPS Tahunan. Preparation of Deed of Minutes and Deed of Statement of Annual GMS Resolutions.	44,000,000
Perusahaan Pemeringkat Efek Securities Rating Agency	PT Pemeringkat Efek Indonesia	Equity Tower Lt. 30 Sudirman Central Business District Lot. 9 Jl. Jend. Sudirman Kav. 52-53 Jakarta 12190 T : (021) 5096 8469 F : (021) 5096 8468 W : www.pefindo.com	• Pemeringkatan atas Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023; dan • Pemeringkatan Tahunan Perusahaan, Obligasi, dan Obligasi Subordinasi Bank Victoria. • Rating of Bank Victoria's Sustainable Bonds III Phase I Year 2023; and • Bank Victoria's Annual Rating of the Company, Bonds, and Subordinated Bond.	525,000,000

Uraian Description	Nama Name	Alamat Address	Jasa yang Diberikan Services Provided	Biaya Jasa Services Fee (Rp)
Penilai Perusahaan Corporate Assessor	Kantor Jasa Penilai Publik Tri, Santi dan Rekan Public Appraisal Service Office Tri, Santi and Partners	Jl. Cipinang Cempedak II No. 58 Jakarta 13340 T : (021) 856 6573 E : corsec@kjpptsr.co.id	Penilaian independen terkait pelaksanaan transaksi jual beli aset tanah seluas 44.816 m^2 yang berlokasi di Perum Villa Cinere Mas kepada PT Tri Daya Investindo. Independent assessment regarding the implementation of sale and purchase transaction of land assets covering an area of 44,816 m^2 located at Perum Villa Cinere Mas to PT Tri Daya Investindo.	110,000,000
	Kantor Jasa Penilai Publik Pung's Zulkarnain dan Rekan Public Appraisal Service Office Pung's Zulkarnain and Partners	Gedung Dana Graha Lt. 1-R.101 Jl. Gondangdia Kecil 12-14 Jakarta 10350 T : (021) 230 3840 F : (021) 230 3940 E : info@kjpp-pungsz.com		90,000,000
Wali Amanat Trustee	PT Bank Mega Tbk	Menara Bank Mega Jl. Kapten Tendean No. 12–12A Jakarta 12970 T : (021) 7917 5000 F : (021) 7918 7100 W : www.bankmega.com	Jasa Tahunan Wali Amanat atas Obligasi dan Obligasi Subordinasi Bank. Annual Trustee Service on the Bank's Bonds and Subordinated Bonds.	352,500,000

ANALISIS DAN PEMBAHASAN MANAJEMEN

Management Discussion and Analysis




BUSINESS

Tinjauan Ekonomi dan Industri
Economic and Industrial Overview



Perekonomian Global dan Nasional

Setelah mencatat pertumbuhan sebesar 3,4% pada tahun 2022, perekonomian global kembali melemah dengan mencatatkan pertumbuhan sebesar 3,0% pada tahun 2023. Hal ini dipengaruhi masih berlanjutnya ketegangan geopolitik yang dipicu perang Rusia di Ukraina yang menyebabkan keterbatasan pasokan sehingga tetap tingginya harga energi dan pangan global serta ketegangan perdagangan antara Amerika Serikat dan Tiongkok yang berdampak pada penurunan ekspor-impor dan volume perdagangan dunia.

Pelambatan ekonomi global juga sejalan dengan proses disinflasi dunia yang melambat. Per Desember 2023, inflasi dunia turun menjadi 6,8% pada Desember 2023 dari level tertinggi pada triwulan II 2022 sebesar 11,6%. Penurunan tersebut sejalan dengan penurunan harga energi dan pangan, terurainya keketatan pasokan, serta dampak dari pengetatan kebijakan moneter bank sentral di banyak negara. Namun pada sisi lain, penurunan inflasi dunia berlangsung lebih lambat dari prakiraan semula. Ketatnya pasar tenaga kerja menyebabkan inflasi di negara-negara maju masih jauh di atas sasaran yang ingin dicapai, yaitu 2%.

Sejalan dengan perekonomian global, pertumbuhan ekonomi Indonesia turut megalami penurunan menjadi 5,04% (*year on year),* lebih rendah dibanding capaian tahun 2022 yang mengalami pertumbuhan sebesar 5,31%. Meskipun berada dalam tren penurunan, perekonomian Indonesia tetap tumbuh baik didukung oleh permintaan domestik yang tetap kuat di tengah

Global and National Economy

After recording growth of 3.4% in 2022, the global economy weakened again by recording growth of 3.0% in 2023. This was influenced by the continuing geopolitical tensions triggered by Russia's war in Ukraine which led to limited supplies, resulting in high global energy and food prices as well as trade tensions between the United States and China that resulted in a decline in export, import, and volume of world trade.

The global economic slowdown was also in line with the slowing world disinflation process. As of December 2023, the world inflation fell to 6.8% in December 2023, from the highest level in the quarter II 2022 by 11.6%. Such decline was in line with the decrease in energy and food prices, loosening of supply tightness, and impact of tightening central bank monetary policy in many countries. However, on the other hand, the decline in world inflation was slower than previous prediction. The tight labor market causing inflation in developed countries was still far above the target to be achieved of 2%.

In line with the global economy, Indonesia's economic growth also decreased to 5.04% (year on year), lower than the achievement in 2022 with growth of 5.31%. Though it was in a downward trend, Indonesian economy continuously grew well, supported by the domestic demand which remained strong amidst declining export performance, remained strong private

penurunan kinerja ekspor, konsumsi swasta termasuk konsumsi di sektor jasa tetap kuat didorong masih tingginya keyakinan konsumen, terjaganya daya beli seiring dengan inflasi yang rendah, stimulus kebijakan fiskal termasuk pemberian subsidi dan berbagai program bantuan sosial, membaiknya investasi yang didorong berlanjutnya penyelesaian Proyek Strategis Nasional (PSN) dan investasi nonbangunan, serta peningkatan di berbagai sektor, baik dari sisi lapangan usaha maupun sisi pengeluaran.

Dari sisi lapangan usaha, sektor transportasi dan pergudangan meraih pertumbuhan tertinggi sebesar 13,96%, diikuti oleh sektor jasa lainnya sebesar 10,52%, serta sektor penyediaan akomodasi dan makan minum sebesar 10,01%. Sementara pada sisi pengeluaran, sektor pengeluaran konsumsi lembaga non-profit yang melayani rumah tangga mencapai pertumbuhan tertinggi sebesar 9,83%, diikuti oleh sektor pengeluaran konsumsi rumah tangga sebesar 4,82%, dan sektor pembentukan modal tetap bruto sebesar 4,40%.

Sumber:
- Bank Indonesia, "Laporan Perekonomian Indonesia Tahun 2023"; dan
- Badan Pusat Statistik, "Pertumbuhan Ekonomi Indonesia Triwulan IV-2023 BRS No. 13/02/Th. XXVII, 5 Februari 2024".

consumption including consumption in services sector driven by high consumer confidence, maintained purchasing power in line with low inflation, policy stimulus fiscal, including the provision of subsidies and various social assistance programs, improved investment driven by the continued completion of National Strategic Projects (PSN) and non-building investment, and improvements in various sectors, both in business and expenditure.

In terms of business sector, transportation and warehousing sector achieved the highest growth at 13.96%, followed by other services sector at 10.52%, and accommodation of food and beverage sector at 10.01%. Meanwhile, on expenditure side, the consumption expenditure sector of non-profit institutions serving households achieved the highest growth at 9.83%, followed by household consumption expenditure sector at 4.82%, and gross fixed capital formation sector at 4.40%.

Source:
- Bank Indonesia, "Indonesia Economic Report 2023"; and
- Statistics Indonesia, "Indonesia's Economic Growth Quarter IV-2023 BRS No. 13/02/Th. XXVII, 5 February 2024".

Tinjauan Pasar Keuangan dan Industri Perbankan

Di tengah pelambatan pertumbuhan ekonomi global, kinerja industri perbankan Indonesia pada tahun 2023 tetap terjaga dengan baik. Hal tersebut tercermin dari kinerja kredit perbankan yang tercatat meningkat pada tahun 2023 10,38% menjadi Rp7,09 triliun dari sebelumnya Rp6,42 triliun. Berdasarkan kelompok penggunaan, pertumbuhan kredit terutama ditopang oleh kredit investasi dan kredit modal kerja yang masing-masing sebesar 12,26% dan 10,05%. Sementara secara sektoral, pertumbuhan kredit terutama ditopang oleh kinerja sektor pengangkutan, jasa sosial, perdagangan, dan listrik, gas, air. Pembiayaan syariah pada Desember 2023 juga tumbuh sebesar 15,80% (yoy), sementara pertumbuhan kredit UMKM mencapai 8,03% (yoy). Dana Pihak Ketiga (DPK) juga mencatatkan pertumbuhan pada tahun 2023 sebesar 3,73% menjadi Rp8.457,93 triliun dari sebelumnya Rp8.153,59 triliun, dengan kontributor pertumbuhan terbesar pada giro yaitu 4,57%. Hal ini disertai dengan meningkatnya *loan to deposit ratio* (LDR) menjadi 84,11% pada tahun 2023.

Selain itu, ketahanan perbankan dan stabilitas sistem keuangan tetap terjaga didukung oleh permodalan yang kuat dan risiko kredit yang rendah. Likuiditas industri perbankan pada Desember 2023 meningkat dengan rasio-rasio likuditas jauh di atas level

Overview of Financial Market and Banking Industry

Amidst the slowing global economic growth, the performance of Indonesian banking industry in 2023 was maintained properly. This was reflected in banking loan performance in 2023 which recorded an increase of 10.38% to Rp7.09 trillion from that of the previous year of Rp6.42 trillion. Based on usage group, the loan growth was mainly supported by investment loans and working capital loans of 12.26% and 10.05%, respectively. Meanwhile, by sector, loan growth was mainly supported by the performance of transportation, social services, trade, and electricity, gas, and water sectors. Sharia financing in December 2023 also grew by 15.80% (yoy), while MSME loan growth reached 8.03% (yoy). Third Party Funds (DPK) also recorded growth in 2023 of 3.73% to Rp8,457.93 trillion, from previously Rp8,153.59 trillion, with demand deposits as the largest contributor to growth of 4.57%. This was coupled with the increase in loan to deposit ratio (LDR) to 84.11% in 2023.

In addition, banking resilience and financial system stability are maintained, supported by strong capital and low loan risk. Banking industry liquidity in December 2023 increased with liquidity ratio far above the level required for supervision. The

kebutuhan pengawasan. Rasio alat likuid/*non-core deposit* (AL/NCD) dan alat likuid/dana pihak ketiga (AL/DPK) masing-masing naik menjadi 120,07% dan 28,73%. Sementara itu, rasio kredit bermasalah perbankan/*non-performing loan* (NPL) tercatat rendah sebesar 2,19% (bruto) dan 0,75% (neto). Secara keseluruhan, ketahanan perbankan yang kuat tersebut didukung oleh kemampuan bayar korporasi dan rumah tangga yang tetap baik, sejalan dengan kinerja korporasi dan ekspektasi penghasilan rumah tangga yang terus membaik.

Sepanjang tahun 2023, industri perbankan secara umum mencatatkan pencapaian kinerja dengan tren positif. Hal tersebut tercermin dari kinerja aset, DPK, dan kredit mencatatkan peningkatan masing-masing sebesar 5,87%, 3,73%, dan 10,61%. Sedangkan, pada Kelompok Bank berdasarkan Modal Inti (KBMI) 1 mencatatkan pencapaian kinerja dengan tren negatif yang tercermin dari penurunan kinerja aset, DPK, dan kredit masing-masing sebesar 4,06%, 7,23% dan 2,34% pada tahun 2023.

Sumber:
- Bank Indonesia, "Laporan Perekonomian Indonesia Tahun 2023";
- Bank Indonesia, "Tinjauan Kebijakan Moneter Desember 2023";
- Otoritas Jasa Keuangan, "Siaran Pers: Sektor Jasa Keuangan yang Kuat dan Stabil untuk Mendukung Pertumbuhan Ekonomi yang Berkelanjutan, 20 Februari 2024"; dan
- Otoritas Jasa Keuangan, "Statistik Perbankan Indonesia - Desember 2023, 21 Februari 2024".

ratio of liquid assets/non-core deposits (AL/NCD) and liquid assets/third party funds (AL/DPK) rose to 120.07% and 28.73%, respectively. Meanwhile, the non-performing loan (NPL) ratio was recorded low at 2.19% (gross) and 0.75% (net). Overall, such strong banking resilience was supported by the continued good repayment capacity of corporation and household, in line with corporate performance and household income expectation which continuously improved.

Throughout 2023, banking industry generally recorded performance achievements with a positive trend. This was reflected in the performance of assets, third party funds, and loans which recorded an increase of 5.87%, 3.73%, and 10.61%, respectively. Meanwhile, the Bank Group based on Core Capital (KBMI) 1 recorded performance achievements with a negative trend, reflected in the decline in assets, third party funds, and loans performance of 4.06%, 7.23%, and 2.34%, respectively, in 2023.

Source:
- Bank Indonesia, "Indonesia Economic Report 2023";
- Bank Indonesia, "Monetary Policy Overview December 2023";
- Financial Services Authority, "Press Release: Strong and Stable Financial Services Sector to Support Sustainable Economic Growth, 20 February 2024"; and
- Financial Services Authority, "Indonesian Banking Statistics - December 2023, 21 February 2024".

Tinjauan Operasional
Operational Overview

Strategi Pengembangan Bisnis

Perseroan berkomitmen untuk terus melakukan inovasi baik terhadap produk, jasa dan layanan, saluran pemasaran maupun infrastruktur pendukung guna menciptakan pengalaman perbankan yang memuaskan kepada nasabah. Komitmen tersebut dilakukan melalui penyusunan rencana strategis bank. Adapun strategi pengembangan bisnis yang dijalankan Bank Victoria sepanjang tahun 2023 diuraikan sebagai berikut:

1. **Strategi Perkreditan**
   Strategi bidang perkreditan diprioritaskan pada upaya menjaga dan meningkatkan kualitas kredit dengan target pertumbuhan yang sehat dan berkesinambungan dengan tetap mengacu pada prinsip kehati–hatian (*prudential financing*) serta dengan menyesuaikan pada prospek perekonomian yang masih penuh ketidakpastian. Beberapa strategi bisnis yang akan dilakukan sebagai berikut:
   a. Memproyeksikan pertumbuhan total kredit secara selektif dan konservatif pada kisaran 7%-9%;

Business Development Strategy

The Company is committed to continuing to innovate in products, services, marketing channels and supporting infrastructure to create a satisfying banking experience for customers. This commitment is implemented out through the preparation of the Bank's strategic plan. Business development strategies implemented by Bank Victoria in 2023 were described as follows:

1. **Loans Strategies**
   The loan strategies are prioritized on efforts to maintain and improve loan quality with a sound and sustainable growth target by still adhering to the prudential financing principles, as well as by adjusting to the full-of-uncertainty economic prospects. Several business strategies to be carried out are as follows:

   a. Projecting total credit growth selectively and conservatively in the range of 7%-9%;

b. Meningkatkan penyaluran kredit dengan model bisnis *channeling* melalui kerja sama *fintech*, BPR, *multifinance* dan koperasi guna meningkatkan portofolio kredit, potensi *fee based income*, dan penetrasi bisnis yang lebih luas;
c. Memperkenalkan ekosistem *digital lending* untuk memberikan informasi dan proses percepatan kredit Bank kepada debitur;
d. Mengembangkan dan meningkatkan kuantitas, kualitas dan profitabilitas bisnis kredit dengan *loan origination system* (LOS) dalam rangka kemudahan layanan *end to end* proses kredit termasuk fungsi pengendalian dan monitoring kredit;
e. Menjaga dan meningkatkan kualitas kredit melalui monitoring debitur, pelaksanaan *early warning*, serta pengembangan sumber daya manusia dan sistem;
f. Mempercepat penyelesaian kredit yang dihapus buku dan penjualan agunan yang diambil alih termasuk di antaranya melalui penjualan jaminan dan AYDA di situs jaringan (situs web); dan
g. Mengoptimalkan program pelatihan yang berkesinambungan untuk meningkatkan kapasitas keahlian tenaga penjualan.

2. Strategi Pendanaan dan Pengembangan Layanan

Strategi bidang pendanaan diprioritaskan pada upaya menjaga dan meningkatkan loyalitas nasabah serta menambah nasabah baru dengan target pertumbuhan yang berbasis struktur pendanaan yang sehat dan optimal. Beberapa strategi bisnis yang akan dilakukan sebagai berikut:

a. Meningkatkan pendanaan (dana pihak ketiga dan surat berharga yang diterbitkan) di kisaran 9%-11% *(year-on-year)* dengan prioritas pada pengendalian *cost of fund* dan beban bunga;
b. Membuat beberapa program seperti akuisisi nasabah baru melalui program CASA *plus gimmick* hadiah, program CASA *cashback* atau bunga yang menarik, serta *loyality program* untuk meningatkan dana CASA;
c. Membuat dan melanjutkan program *bundling* atau paket kombinasi produk untuk pilihan nasabah;
d. Menjalin kerja sama dan meningkatkan penjualan obligasi ritel, *bancassurance*, dan reksadana guna meningkatkan pendapatan melalui *fee based income*;
e. Melakukan pengembangan secara berkelanjutan dalam *revamping* terhadap *internet banking, mobile banking* dan *internet banking business* yang dilengkapi dengan fitur dan produk digital unggul serta bersaing untuk memenuhi kebutuhan transaksi keuangan;
f. Meningkatkan kualitas layanan guna memenuhi kebutuhan nasabah dengan melakukan pengembangan *digital operations*, yaitu melakukan aktivitas transaksi non tunai dengan menggunakan teknologi *video banking,* sehingga interaksi transaksi dapat dilakukan secara virtual namun tetap mengedepankan prinsip kehati-hatian serta keamanan bertransaksi;
g. Melakukan promosi melalui media sosial dan/atau kegiatan lain untuk lebih memperkenalkan produk dan layanan Bank Victoria kepada masyarakat;

b. Increasing loans with channeling business models through collaboration with fintech, BPR, multifinance, and cooperatives to increase loan portfolios, potential fee-based income, and broader business penetration;
c. Introducing a digital lending ecosystem to provide information and the speed of the Bank's loan process to the debtor;
d. Developing and increasing the quantity, quality, and profitability of the credit business with the loan origination system (LOS) to facilitate end-to-end credit process services including credit control and monitoring functions;
e. Maintaining and improving loan quality through monitoring debtors, implementing early warnings, and developing human resources and system;
f. Accelerating the settlement of written-off loans and the sale of foreclosed assets, including through the sale of collateral and AYDA on the website; and
g. Optimizing continuous training programs to increase the skill capacity of the sales force.

2. Funding and Development Strategies

The funding strategies are prioritized on efforts to maintain and increase customer loyalty and add new customers with a growth target based on a sound and optimal funding structure. Several business strategies to be carried out are as follows:

a. Increasing funding (third-party deposits and securities issued) in the range of 9%-11% (year-on-year) with priority on controlling the cost of funds and interest expenses;
b. Creating several programs such as acquisition of new customers through CASA program plus gift gimmicks, CASA cashback program or attractive interest rates, and loyalty programs in order to increase CASA funds;
c. Creating and continuing bundling programs or product combination packages for the customer's choice;
d. Collaborating and increasing sales of retail bonds, bancassurance, and mutual funds to increase income through fee-based income;
e. Conducting sustainable development in revamping internet banking, mobile banking internet, and banking business equipped with superior and competitive digital features and products to meet the needs of the financial transactions;
f. Improving services quality to meet customer needs by developing digital operations, which is by conducting non-cash transaction activities using video banking technology, so that transaction interactions can be carried out virtually but still prioritizing the principles of prudence and security in making transactions;
g. Carrying out promotions through social media and/or other activities to introduce Bank Victoria products and services closer to the public;

h. Meningkatkan layanan transaksi perbankan untuk mendukung kebutuhan transaksi para investor dalam rangka penetrasi peluang bisnis yang lebih luas;
i. Melakukan pendekatan dan pemasaran ke sekolah-sekolah untuk tujuan nasabah baru (*customer base*) yaitu murid, orang tua, dan guru untuk mendukung program literasi atau inklusi keuangan yang dicanangkan oleh pemerintah; dan
j. Melakukan sinergi dengan grup usaha dalam pengembangan bisnis berkelanjutan.

3. **Strategi bidang Operasional dan Teknologi Sistem Informasi**

Strategi bidang Operasional dan Teknologi Sistem Informasi diprioritaskan pada upaya pemanfaatan dan pengembangan teknologi informasi yang berkelanjutan dalam rangka mendukung aspek peningkatan kualitas layanan, operasional bisnis, keamanan, dan kepatuhan terhadap regulasi. Beberapa strategi poin yang akan diterapkan oleh Bank sebagai berikut:

a. Melanjutkan penerapan 3 No's (*No Delay, No Error & No Fraud*) serta memberikan *service excellence* kepada nasabah dalam rangka memastikan operasional Bank berjalan dengan baik dan memadai;
b. Melakukan tinjauan dan pengembangan terhadap kontrol pengamanan sistem teknologi informasi yang efektif dan tingkat kepatuhan yang baik terhadap ketentuan pihak regulator; dan
c. Melanjutkan penguatan dan pengembangan operasional serta pemenuhan ketentuan terkait kepatuhan untuk meningkatkan interaksi dan layanan kepada nasabah, percepatan *management oversight* kepada seluruh cabang atau lini usaha dan penunjang rencana bisnis, serta operasional yang berkelanjutan, seperti di antaranya pengembangan layanan dan produk perbankan dengan bentuk *digital banking, loan origination system*, aplikasi kredit *scoring*, *big data*, dan digitalisasi proses *customer on boarding*.

Selain itu, strategi peningkatan infrastruktur dan teknologi serta perbaikan fundamental Bank untuk periode jangka pendek dan menengah yang terkoneksi antara *channels*, data, dan analisis *trends* dari *digital channels*, data *warehouse*, dan *monitoring* akan dibangun dalam kurun waktu 2-3 tahun ke depan. Bank juga akan membangun dan merencanakan proses IT *Strategic Plan* untuk jangka panjang yang berfokus pada:

a. Meningkatkan dan melakukan *update* aplikasi dan infrastruktur Bank untuk mendukung kebutuhan bisnis;
b. Meningkatkan manajemen proyek berdasarkan *system development live cycle* (SDLC) menggunakan metode *agile/scrum* maupun dengan metode *waterfall*; dan
c. Meningkatkan koordinasi dan komunikasi dalam pengembangan IT secara internal dan dengan pemangku kepentingan Bank.

h. Improving banking transaction services to support investors' transaction needs in order to penetrate broader business opportunities;
i. Approaching and marketing to schools for new customers (customer base), which are students, parents, and teachers to support financial literacy or inclusion programs launched by the government; and
j. Synergizing with business groups in sustainable business development.

3. **Operational and Information Systems Technology Strategies**

Operational and Information System Technology strategies are prioritized on efforts to utilize and develop sustainable information technology in order to support the aspects of improving service quality, business operations, security, and regulatory compliance. Some points of the strategies that will applied by the Bank are as follows:

a. Continuing the application of 3 No's (No Delay, No Error, & No Fraud) and providing service excellence to customers in order to ensure that the Bank's operations run properly and adequately;
b. Reviewing and developing effective controls of information technology system security and a healthy compliance with regulator's provisions; and
c. Continuing operational strengthening and development as well as compliance with compliance-related regulations to increase interaction and service to customers, accelerate management oversight of all branches or business lines and supporting business plans, as well as sustainable operations, among others, developing banking services and products in form of digital banking, loans origination system, credit scoring application, big data, and customer on boarding digitalization process.

Furthermore, strategies for improving infrastructure and technology as well as improving the Bank's fundamentals for the short-term and medium-term period connected between channels, data, and trend analysis from digital channels, data warehouse, and monitoring will be developed within the next 2 to 3 years. The Bank will also build and plan an IT Strategic Plan process for the long-term strategy that focuses on:

a. Improving and updating Bank applications and infrastructure to support business needs;
b. Improving project management based on the system development live cycle (SDLC) using the agile/scrum method and the waterfall method; and
c. Improving coordination and communication in developing IT internally and with Bank stakeholders.

Strategi Pemasaran

Bank telah menerapkan berbagai strategi pemasaran dalam rangka meningkatkan penjualan produk-produk Bank, mempertahankan pangsa pasar, meraih peluang usaha, serta menghadapi persaingan melalui strategi-strategi berikut:

1. Mewujudkan inovasi produk dan layanan digital maupun pengembangannya dengan dukungan sistem teknologi informasi guna menciptakan keunggulan kompetitif dan loyalitas nasabah dalam rangka mendorong pendapatan operasional termasuk *fee based income* dan memperluas pangsa pasar;
2. Melanjutkan evaluasi dan merelokasi jaringan kantor ke lokasi bisnis yang lebih menguntungkan; dan
3. Mengoptimalkan peran jaringan kantor guna memperluas pangsa pasar termasuk pengenalan secara intensif terhadap produk dan layanan digital sebagai inovasi terkini yang diberikan.

Marketing Strategy

The Bank has implemented various marketing strategies to increase the Bank's product sales, maintain market share, gain business opportunities, and face competition through the following strategies:

1. Realizing digital product and service innovation as well as their development with the support of information technology systems to create competitive advantage and customer loyalty to encourage operational income, including fee-based income, and expand market share;
2. Continuing to evaluate and relocate office networks to more profitable business locations; and
3. Optimizing the role of office networks to expand market share, including intensive introduction of digital products and services as the latest provided innovations.

Pangsa Pasar

Bank Victoria menghadapi persaingan dengan seluruh bank umum konvensional kelompok bank berdasarkan modal inti (KBMI) I (Bank dengan Modal Inti Rp1 triliun sampai dengan Rp6 triliun) dan industri perbankan di Indonesia dalam menentukan penguasaan pasar. Persaingan usaha tersebut antara lain dapat dilihat berdasarkan total aset yang dimiliki, total dana pihak ketiga yang berhasil dihimpun, dan total kredit yang diberikan oleh Bank sebagai berikut:

Market Share

Bank Victoria faces competition with all conventional commercial banks in the bank group based on core capital (KBMI) I (Bank with Core Capital of Rp1 trillion to Rp6 trillion) and the banking industry in Indonesia in determining market dominance. Such business competition can be seen based on the total assets owned, the total third party funds collected, and the total loans by the Bank as follows:

(dalam miliar Rupiah, kecuali dinyatakan lain / in billion Rupiah, unless stated otherwise)

Uraian	2023			2022*			Description
	Aset Assets	Kredit Loans	DPK Third-Party Funds	Aset Assets	Kredit Loans	DPK Third-Party Funds	
Perbankan Nasional (BUK)	11,765,838	7,090,243	8,457,929	11,113,321	6,497,620	8,153,590	National Banking (BUK)
KBMI 1	1,377,864	754,649	918,307	1,436,185	772,695	989,871	KBMI 1
Bank Victoria	29,624	18,629	22,429	25,932	15,825	19,372	Bank Victoria
Pangsa Pasar terhadap BUK (%)	0.25	0.26	0.27	0.23	0.24	0.24	Market Share to BUK (%)
Pangsa Pasar terhadap KBMI 1 (%)	2.15	2.47	2.44	1.81	2.05	1.96	Market Share of KBMI 1 (%)

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Secara keseluruhan pangsa pasar Bank Victoria terhadap Industri Perbankan dan KBMI I dari segi aset, DPK, dan kredit mengalami peningkatan dibandingkan dengan pangsa pasar tahun sebelumnya.

Overall, Bank Victoria's market share in banking industry and KBMI I in terms of assets, third party funds, and loans increased compared to the previous year's market share.

Suku Bunga Dasar Bank

Berdasarkan Peraturan Otoritas Jasa Keuangan No. 37/POJK.03/2019 tentang Transparansi dan Publikasi Laporan Bank dan Surat Edaran Otoritas Jasa Keuangan No. 9/SEOJK.03/2020 tentang Transparansi dan Publikasi Laporan Bank Umum Konvensional, bank umum yang menjalankan kegiatan usaha secara konvensional memiliki kewajiban untuk melaporkan dan mempublikasikan Suku Bunga Dasar Kredit (SBDK) dalam mata uang Rupiah. Publikasi ini untuk memberikan kejelasan dan memudahkan nasabah dalam menimbang manfaat, biaya, dan risiko kredit yang ditawarkan.

SBDK digunakan sebagai pedoman penetapan suku bunga kredit yang akan dikenakan kepada nasabah. Namun demikian, SBDK belum memperhitungkan komponen estimasi premi risiko yang besarnya tergantung dari penilaian Bank terhadap risiko masing-masing debitur atau kelompok debitur. Bank senantiasa meninjau ulang dan memperbarui SBDK sesuai dengan pergerakan suku bunga acuan BI 7-*day (Reverse) Repo Rate*. Adapun tingkat SBDK Bank diuraikan sebagai berikut:

Prime Lending Rate

Pursuant to the Financial Services Authority Regulation No. 37/POJK.03/2019 on Transparency and Publication of Bank Reports and Financial Services Authority Circular No. 9/SEOJK.03/2020 on Transparency and Publication of Conventional Commercial Bank Reports, commercial banks that carry out conventional business activities are required to report and publish Prime Lending Rate (SBDK) in Rupiah. This publication is to provide clarity and make it easier for customers to consider benefits, costs, and risks of the loans offered.

SBDK is used as the guideline for determining the lending rate that will be charged to customers. However, SBDK does not calculate the risk premium estimation component, the amount of which depends on the Bank's assessment of the risks of each debtor or group of debtors. The Bank constantly reviews and updates prime lending rate according to movements in benchmark interest rate BI 7-day (Reverse) Repo Rate. The Bank's SBDK is described as follows:

Tingkat Suku Bunga Penghimpunan Dana Rata-Rata Setahun
Annual Average Interest Rate of Funding

(dalam % / in %)

Uraian	2023	2022	Description
Giro			**Demand Deposits**
Rupiah	**0.86**	3.30	Rupiah
Dolar Amerika Serikat	**0.48**	0.58	United States Dollar
Tabungan			**Savings Deposits**
Rupiah	**1.06**	3.80	Rupiah
Dolar Amerika Serikat	**N/A**	N/A	United States Dollar
Deposito Berjangka			**Time Deposits**
Rupiah	**5.20**	4.42	Rupiah
Dolar Amerika Serikat	**2.97**	1.57	United States Dollar

Tingkat Suku Bunga Dasar Kredit Rupiah (*Prime Lending Rate*) Per Tahun
Rupiah Prime Lending Rate Per Year

(dalam % / in %)

Komponen[1]	Kredit Korporasi[2] Corporate Loans[2]	Kredit Ritel[2] Retail Credit[2]	Kredit Mikro[3] Micro Credit[3]	Kredit Konsumsi[2] Consumer Credit[2]		Component[1]
				KPR House Loan	Non-KPR[4] Non-House Loan[4]	
Harga Pokok Dana untuk Kredit (HPDK) / Cost of Funds for Loans (HPDK)						
Biaya Dana	5.72	5.72	-	5.72	5.72	**Cost of Funds**
Biaya Dana Pihak Ketiga	4.80	4.80	-	4.80	4.80	Cost of Third-Party Funds
Biaya Dana Bukan Pihak Ketiga	0.92	0.92	-	0.92	0.92	Cost of Non-Third-Party Funds

Komponen[1]	Kredit Korporasi[2] Corporate Loans[2]	Kredit Ritel[2] Retail Credit[2]	Kredit Mikro[3] Micro Credit[3]	Kredit Konsumsi[2] Consumer Credit[2]		Component[1]
				KPR House Loan	Non-KPR[4] Non-House Loan[4]	
Biaya Dana Liabilitas kepada Bank Lain	0.22	0.22	-	0.22	0.22	Cost of Liability Funds to Other Banks
Biaya Dana Liabilitas kepada Bank Indonesia	0.00	0.00	-	0.00	0.00	Cost of Liability Funds to Bank Indonesia
Biaya Dana Surat Berharga	0.70	0.70	-	0.70	0.70	Cost of Securities Funds
Biaya Dana Pinjaman yang Diterima	0.00	0.00	-	0.00	0.00	Cost of Borrowing Funds
Biaya Dana Liabilitas antar Kantor	0.00	0.00	-	0.00	0.00	Cost of Inter-Office Liability Funds
Biaya Dana Liabilitas Keuangan Permodalan	0.00	0.00	-	0.00	0.00	Cost of Capital Finance Liability Funds
Biaya Dana Lainnya	0.00	0.00	-	0.00	0.00	Cost of Other Funds
Biaya Promosi dan Pemasaran terkait Pendanaan	0.00	0.00	-	0.00	0.00	Cost of Promotion and Marketing related to Funding
Lainnya	0.00	0.00	-	0.00	0.00	Others
Biaya Jasa	0.02	0.02	-	0.02	0.02	Cost of Services
Biaya Regulasi	0.59	0.59	-	0.59	0.59	Cost of Regulations
Biaya GWM	0.39	0.39	-	0.39	0.39	Cost of Statutory Reserve Requirement
Biaya Premi Penjaminan Lembaga Penjamin Simpanan	0.20	0.20	-	0.20	0.20	Cost of Deposit Insurance Corporation Guarantee Premium
HPDK Lainnya	0.00	0.00	-	0.00	0.00	Other HPDK
Biaya Kas	0.00	0.00	-	0.00	0.00	Cost of Cash
Lainnya	0.00	0.00	-	0.00	0.00	Others
Biaya Overhead / Overhead Cost						
Biaya Tenaga Kerja	0.68	0.68	-	0.68	0.68	Labor Cost
Biaya Pendidikan dan Pelatihan	0.03	0.03	-	0.03	0.03	Education and Training Cost
Biaya Penelitian dan Pengembangan	0.03	0.03	-	0.03	0.03	Research and Development Cost
Biaya Sewa	0.06	0.06	-	0.06	0.06	Rent Cost
Biaya Promosi dan Pemasaran	0.02	0.02	-	0.02	0.02	Promotion and Marketing Cost
Cash Back	0.00	0.00	-	0.00	0.00	Cash Back
Hadiah	0.00	0.00	-	0.00	0.00	Gifts
Iklan dan Promosi	0.02	0.02	-	0.02	0.02	Advertising and Promotion
Sponsorship/ Entertainment	0.00	0.00	-	0.00	0.00	Sponsorship/ Entertainment
Lainnya	0.00	0.00	-	0.00	0.00	Others
Biaya Pemeliharaan dan Perbaikan	0.02	0.02	-	0.02	0.02	Maintenance and Repair Cost

Komponen[1]	Kredit Korporasi[2] Corporate Loans[2]	Kredit Ritel[2] Retail Credit[2]	Kredit Mikro[3] Micro Credit[3]	Kredit Konsumsi[2] Consumer Credit[2]		Component[1]
				KPR House Loan	Non-KPR[4] Non-House Loan[4]	
Biaya Penyusutan Aset Tetap dan Inventaris	0.12	0.12	-	0.12	0.12	Depreciation of Fixed Asset and Inventory Cost
Biaya *Overhead* Lainnya	0.06	0.06	-	0.06	0.06	Other Overhead Cost
Biaya Barang/Jasa dan Administrasi	0.06	0.06	-	0.06	0.06	Goods/Services and Administration Cost
Lainnya	0.00	0.00	-	0.00	0.00	Others
Margin Keuntungan	**2.35**	**3.10**	**-**	**2.35**	**4.60**	**Profit Margin**
Suku Bunga Dasar Kredit (SBDK)	**9.70**	**10.45**	**-**	**9.70**	**11.95**	**Prime Lending Rate (SBDK)**
Estimasi Premi Risiko	**1.00**	**1.50**	**-**	**1.25**	**1.75**	**Risk Premium Estimation**
Suku Bunga Kredit (SBDK + Estimasi Premi Risiko)	**10.70**	**11.95**	**-**	**10.95**	**13.70**	**Loan Interest Rate (SBDK + Risk Premium Estimation)**

Keterangan:
1) Masing-masing komponen diisi sepanjang digunakan untuk membiayai kredit; / Each component is filled in as long as it is used to finance credit;
2) Penggolongan kredit korporasi, kredit ritel, dan kredit konsumsi (KPR dan Non-KPR) dilakukan berdasarkan kriteria yang ditetapkan oleh internal Bank; / The classification of corporate credit, retail credit, and consumer credit (House Loan and Non-House Loan) is carried out based on the criteria set by the Bank's internal party;
3) Penggolongan kredit mikro berpedoman pada definisi usaha mikro; serta / The classification of micro credit refers to the definition of micro business; and
4) Tidak termasuk kartu kredit dan kredit tanpa agunan (KTA). / Does not include credit cards and unsecured credit (KTA).

Tingkat Suku Bunga Pinjaman Rata-Rata Setahun
Annual Average Interest Rate of Loans

(dalam % / in %)

Uraian	2023	2022	Description
Rupiah	**9.85**	9.72	Rupiah
Dolar Amerika Serikat	**8.85**	7.07	United States Dollar

Tinjauan Segmen Usaha

Penjelasan dan Kinerja Operasional Segmen Operasi

Sebagai badan usaha yang bergerak dalam bidang perbankan, segmen operasi Bank Victoria hanya terdiri dari 1 (satu) segmen yaitu segmen konvensional. Adapun uraian terkait kinerja segmen konvensional sepanjang tahun 2023 diuraikan sebagai berikut:

Segmen Konvensional

Segmen konvensional Bank Victoria terdiri atas produk simpanan, produk pinjaman, dan jasa layanan.

1. **Penghimpunan Dana (Simpanan)**

   Produk simpanan merupakan dana pihak ketiga yang berhasil dihimpun oleh Bank melalui berbagai produk tabungan, giro, dan deposito. Kinerja operasional produk simpanan Bank dalam 2 (dua) tahun terakhir diuraikan sebagai berikut:

Business Segment Overview

Explanation and Operational Performance of Operating Segment

As a business entity operating in banking sector, Bank Victoria's operating segment only consists of 1 (one) segment, namely the conventional segment. The description regarding the conventional segment performance throughout 2023 is outlined as follows:

Conventional Segment

Bank Victoria's conventional segment consists of savings products, loan products, and services.

1. **Funding (Savings)**

   Savings products are third party funds that have been collected by the Bank through various savings deposits, demand deposits, and time deposits products. The operating performance of the Bank's savings products for the last 2 (two) years is described as follows:

Total Rekening Dana Pihak Ketiga
Total Accounts of Third-Party Funds

(dalam unit rekening, kecuali dinyatakan lain / in account unit, unless stated otherwise)

Uraian	2023	Komposisi Composition (%)	2022	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Tabungan	41,191	65.71	42,100	68.23	(2.16)	Savings Deposits
Giro	2,564	4.09	2,461	3.99	4.19	Demand Deposits
Deposito Berjangka	18,781	29.96	16,947	27.47	10.82	Time Deposits
Negotiable Certificate Deposits	150	0.24	191	0.31	(21.47)	Negotiable Certificate Deposits
Total	62,686	100.00	**61,699**	**100.00**	**1.59**	Total

Total rekening dana pihak ketiga yang berhasil dihimpun oleh Bank Victoria tercatat sebesar 62.686 unit rekening pada tahun 2023. Jumlah tersebut meningkat 1,59% dari sebelumnya tercatat sebesar 61.699 unit rekening pada tahun 2022. Peningkatan tersebut dikontribusikan oleh produk deposito berjangka sebesar 10,82%.

The total accounts of third party funds collected by Bank Victoria were 62,686 account units in 2023. This amount increased by 1.59% from previously 61,699 account units in 2022. Such increase was contributed by time deposits product of 10.82%.

Total Dana Pihak Ketiga
Total Third-Party Funds

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	Komposisi Composition (%)	2022*	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Tabungan	2,881,781	12.85	3,148,224	16.25	(8.46)	Savings Deposits
Giro	2,484,506	11.08	2,383,881	12.31	4.22	Demand Deposits
Deposito Berjangka	16,668,585	74.32	13,628,891	70.35	22.30	Time Deposits
Negotiable Certificate Deposits	394,309	1.76	210,841	1.09	87.02	Negotiable Certificate Deposits
Total	22,429,180	100.00	**19,371,837**	**100.00**	**15.78**	Total

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Sementara itu, total dana pihak ketiga yang berhasil dihimpun Bank Bank Victoria per 31 Desember 2023 mengalami peningkatan sebesar 15,78% dari sebelumnya sebesar Rp19,37 triliun per 31 Desember 2022 menjadi Rp22,43 triliun. Hal tersebut dipengaruhi oleh peningkatan giro, deposito berjangka, dan *negotiable certificate deposits.*

Meanwhile, the total third party funds collected by Bank Victoria as of 31 December 2023 increased by 15.78% from previously Rp19.37 trillion as of 31 December 2022 to Rp22.43 trillion. This was affected by the increase in demand deposits, time deposits, and negotiable certificate deposits.

2. Penyaluran Dana (Pinjaman)

Produk pinjaman merupakan pemberian kredit kepada pihak ketiga, baik perorangan maupun perusahaan. Pelaksanaan pemberian kredit dilakukan dengan tetap memperhatikan prinsip kehati-hatian dan prosedur perkreditan yang sehat. Kinerja produk pinjaman sepanjang tahun 2023 diuraikan sebagai berikut:

2. Lending (Loans)

Loan products are credit provision to third parties, either individual or company. The provision of loans is carried out with due regard to the prudential principles and sound credit procedures. Loan product performance throughout 2023 is described as follows:

Produk Pinjaman berdasarkan Pihak
Loan Products by Parties

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	Komposisi Composition (%)	2022*	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pihak Ketiga	18,484,847	99.23	15,751,345	99.54	17.35	Third Parties
Pihak Berelasi	143,896	0.77	73,266	0.46	96.40	Related Parties
Total	**18,628,743**	**100.00**	**15,824,611**	**100.00**	**17.72**	**Total**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Pada tahun 2023, Bank Victoria menyalurkan pinjaman kepada pihak ketiga sebesar Rp18,48 triliun, meningkat 17,35% dibandingkan tahun 2022 sebesar Rp15,75 triliun. Sedangkan kepada pihak berelasi, Bank menyalurkan pinjaman sebesar Rp143,90 miliar, lebih tinggi dibandingkan tahun sebelumnya sebesar Rp73,27 miliar. Secara komposisi, produk pinjaman berdasarkan pihak tetap didominasi oleh pinjaman kepada pihak ketiga dengan komposisi 99,23%.

In 2023, Bank Victoria disbursed loans to third parties of Rp18.48 trillion, an increase of 17.35% compared to in 2022 of Rp15.75 trillion. Meanwhile, to related parties, the Bank disbursed loans of Rp143.90 billion, higher than that of the previous year of Rp73.27 billion. Compositionally, loan products based on parties were dominated by loans to third parties with a composition of 99.23%.

Produk Pinjaman berdasarkan Jenis Pinjaman
Loan Products by Types of Loans

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	Komposisi Composition (%)	2022*	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pinjaman Tetap	9,697,513	52.06	8,860,926	55.99	9.44	Fixed Loans
Pinjaman Konsumen	164,627	0.88	167,465	1.06	(1.69)	Consumer Loans
Pinjaman Rekening Koran	1,871,767	10.05	1,677,755	10.60	11.56	Overdraft Loans
Pinjaman Tetap dengan Angsuran	6,864,293	36.85	5,078,177	32.09	35.17	Fixed Loans with Installments
Pinjaman Serba Guna	30,543	0.16	40,288	0.25	(24.19)	Other Loans
Total	**18,628,743**	**100.00**	**15,824,611**	**100.00**	**17.72**	**Total**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Sepanjang tahun 2023, Bank menyalurkan total pinjaman sebesar Rp18,63 triliun, meningkat sebesar 17,72% dibandingkan tahun 2022 sebesar Rp15,82 triliun. Peningkatan ini khususnya karena produk pinjaman tetap dengan angsuran, rekening koran, dan pinjaman tetap.

Throughout 2023, the Bank disbursed total loans of Rp18.63 trillion, an increase of 17.72% compared to Rp15.82 trillion in 2022. This increase was mainly due to fixed loan products with installments, overdraft loans, and fixed loans.

Produk Pinjaman berdasarkan Sektor Ekonomi
Loan Products by Economic Sector

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	Komposisi Composition (%)	2022*	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Lembaga Pembiayaan	5,563,012	29.86	3,810,285	24.08	46.00	Financing
Perdagangan, Restoran, dan Hotel	3,574,240	19.19	3,471,734	21.94	2.95	Trading, Restaurant, and Hotel
Industri	2,186,357	11.74	1,546,407	9.77	41.38	Industry
Real Estat	2,533,799	13.60	2,434,559	15.38	4.08	Real Estate
Konstruksi	852,268	4.58	782,272	4.94	(5.68)	Construction
Jasa-Jasa Sosial/ Masyarakat	349,351	1.88	423,151	2.67	(17.44)	Social Community Service
Lain-Lain	3,569,716	19.16	3,356,203	21.21	9.77	Others
Total	**18,628,743**	**100.00**	**15,824,611**	**100.00**	**17.72**	**Total**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Berdasarkan sektor ekonomi, kontribusi penyaluran pinjaman terbesar pada tahun 2023 berasal dari sektor lembaga pembiayaan sebesar Rp5,56 triliun atau 29,86% dari total pinjaman. Sedangkan, kontribusi penyaluran pinjaman terkecil pada tahun 2023 berasal dari sektor jasa-jasa sosial/masyarakat sebesar Rp349,35 miliar atau 1,88% dari total pinjaman.

Based on economic sector, the largest contribution to lending in 2023 came from the financing sector of Rp5.56 trillion or 29.86% of the total loans. Meanwhile, the smallest contribution to lending in 2023 came from social community service sector of Rp349.35 billion or 1.88% of the total loans.

Produk Pinjaman UMKM
MSME Loan Products

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	Komposisi Composition (%)	2022*	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Usaha Mikro	-	-	-	-	-	Micro Business
Usaha Kecil	16,499	0.54	20,696	0.85	(20.28)	Small Business
Usaha Menengah	3,037,478	99.46	2,424,657	99.15	25.27	Medium Business
Total	**3,053,977**	**100.00**	**2,445,353**	**100.00**	**24.89**	**Total**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Pada tahun 2023, kinerja pinjaman UMKM mengalami peningkatan sebesar 24,89% dibandingkan tahun sebelumnya tercatat sebesar Rp2,45 triliun pada tahun 2022. Peningkatan tersebut terutama disebabkan oleh kenaikan pada usaha menengah sebesar 25,27%.

In 2023, the performance of MSME loans increased by 24.89% compared to that of the previous year of Rp2.45 trillion in 2022. Such increase was mainly due to the increase in medium business by 25.27%.

3. Jasa Layanan

Bank Victoria memberikan berbagai layanan penunjang yang bertujuan untuk memudahkan nasabah dalam melakukan transaksi perbankan. Pada tahun 2023, kinerja operasional dari layanan perbankan Bank Victoria diuraikan sebagai berikut:

3. Services

Bank Victoria provides a variety of supporting services aimed at facilitating customers in conducting banking transactions. In 2023, the operational performance of Bank Victoria's banking services was described as follows:

Layanan Keuangan
Financial Services

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	Komposisi Composition (%)	2022*	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Kliring	584,733	31.00	116,756	4.61	400.82	Clearing
Postpaid	7,748	0.41	699	0.03	1,008.44	Postpaid
Prepaid	111	0.01	9	0.00	1,133.33	Prepaid
Pembayaran Telkom	8,429	0.45	805	0.03	947.08	Telkom Payment
Pembayaran Gaji Karyawan	14,597	0.77	4,762	0.19	206.53	Employees' Salary Payments
ATM Victoria	1,270,649	67.36	2,408,529	95.14	(47.24)	ATM Victoria
Total	1,886,267	100.00	**2,531,560**	**100.00**	**(25.49)**	**Total**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Pada tahun 2023, jasa layanan keuangan Bank Victoria tercatat mengalami penurunan sebesar 25,49%, dari Rp2,53 triliun di tahun 2022 menjadi Rp1,89 triliun di tahun 2023. Penurunan tersebut bersumber dari ATM Victoria.

In 2023, Bank Victoria's financial services decreased by 25.49%, from Rp2.53 trillion in 2022 to Rp1.89 trillion in 2023. Such decrease was mainly from ATM Victoria.

Layanan Bank Devisa

Foreign Exchange Bank Services

Total Rekening Dana Pihak Ketiga Layanan Bank Devisa
Total Third-Party Accounts for Foreign Exchange Bank Services

(dalam unit rekening, kecuali dinyatakan laint / in account unit, unless stated otherwise)

Uraian	2023	Komposisi Composition (%)	2022	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Giro	2,564	11.93	686	70.29	273.76	Demand Deposits
Deposito Berjangka	18,931	88.07	290	29.71	6,427.93	Time Deposits
Total	21,495	100.00	**976**	**100.00**	**2,102.36**	**Total**

Total rekening dana pihak ketiga dari layanan bank devisa di tahun 2023 mencapai 21.495 unit rekening. Jumlah tersebut mengalami peningkatan signifikan sebesar 2.102,36% dibanding tahun 2022 yang mencapai 976 unit rekening. Peningkatan tersebut dipengaruhi oleh deposito berjangka sebesar 6.427,93%.

Total third party fund accounts from foreign exchange bank services in 2023 reached 21,495 account units. This number increased significantly by 2,102.36% compared to that of 2022 of 976 account units. Such increase was affected by time deposits of 6,427.93%.

Total Dana Pihak Ketiga Layanan Bank Devisa
Total Third-Party Funds for Foreign Exchange Bank Services

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	Komposisi Composition (%)	2022*	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Giro	2,484,505	12.71	65,828	12.28	3,674.24	Demand Deposits
Deposito Berjangka	17,062,893	87.29	470,087	87.72	3,529.73	Time Deposits
Total	**19,547,398**	**100.00**	**535,915**	**100.00**	**3,547.48**	**Total**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Sejalan dengan meningkatnya jumlah rekening dana pihak ketiga dari layanan bank devisa di tahun 2023, dana yang terkumpul juga mengalami peningkatan sebesar 3.547,48% menjadi Rp19,55 triliun dari sebelumnya Rp535,92 miliar di tahun 2022. Hal tersebut terutama bersumber dari deposito berjangka yang meningkat sebesar 3.529,73%.

In line with the increase in the total accounts of third party deposits from foreign exchange bank services in 2023, the funds collected also increased by 3,547.48% from previously Rp19.55 trillion to Rp535.92 billion in 2022. Such case mainly came from time deposits that increased by 3,529.73%.

Transaksi melalui Jaringan Layanan Utama

Transactions through the Main Service Network

Jumlah Transaksi
Total Transactions

Uraian	2023	Komposisi Composition (%)	2022	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Mobile Banking	1,765,192	71.78	154,027	14.55	1,046.03	Mobile Banking
Internet Banking	17,118	0.70	15,285	1.44	11.99	Internet Banking
Teller	12,974	0.53	16,042	1.52	(19.12)	Teller
ATM	664,001	26.99	873,078	82.49	(23.95)	ATM
Total	**2,459,285**	**100.00**	**1,058,432**	**100.00**	**132.35**	**Total**

Nilai Transaksi
Total Transactions

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	Komposisi Composition (%)	2022	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Mobile Banking	9,747,257	74.86	735,230	4.47	1,225.74	Mobile Banking
Internet Banking	479,592	3.68	4,763,052	28.93	(89.93)	Internet Banking
Teller	1,524,000	11.70	8,557,229	51.98	(82.19)	Teller
ATM	1,270,649	9.76	2,408,529	14.63	(47.24)	ATM
Total	**13,021,498**	**100.00**	**16,464,040**	**100.00**	**(20.91)**	**Total**

Pada tahun 2023, nilai transaksi yang dibukukan Bank Victoria melalui jaringan layanan utama tercatat sebesar Rp13,02 triliun, lebih rendah 20,91% dari periode sebelumnya yang tercatat sebesar Rp16,46 triliun. Penurunan transaksi tertinggi dikontribusikan oleh *internet banking* dan teller.

In 2023, the transaction value recorded by Bank Victoria through its main service network was Rp13.02 trillion, 20.91% lower than that of the previous period of Rp16.46 trillion. The highest decline in transactions was contributed by internet banking and teller.

Pendapatan dan Profitabilitas

Kinerja profitabilitas segmen konvensional Bank Victoria sepanjang tahun 2023 disajikan sebagai berikut:

Income and Profitability

The profitability performance of Bank Victoria's conventional segment throughout 2023 is presented as follows:

Segmen Usaha
Business Segment

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian Description	Konvensional Conventional	Syariah Sharia	Eliminasi Elimination	Total
2023				
Pendapatan Bunga dan Syariah - Bersih **Interest and Sharia Income - Net**	**578,729**	-	-	**578,729**
Pendapatan Operasional Lainnya **Other Operating Income**	**253,365**	-	-	**253,365**
Beban Operasional Lainnya **Other Operating Expenses**	**(626,226)**	-	-	**(626,226)**
Laba/(Rugi) Operasional **Profit/(Loss) from Operations**	**205,868**	-	-	**205,868**
Total Aset **Total Assets**	**29,624,240**	-	-	**29,624,240**
Total Liabilitas **Total Liabilities**	**25,799,455**	-	-	**25,799,455**
2022*				
Pendapatan Bunga dan Syariah - Bersih Interest and Sharia Income - Net	699,307	34,074	-	**733,381**
Pendapatan Operasional Lainnya Other Operating Income	377,772	6,038	(3,606)	**380,203**
Beban Operasional Lainnya Other Operating Expenses	(663,475)	(36,042)	-	**(699,517)**
Laba/(Rugi) Operasional Profit/(Loss) from Operations	413,603	4,070	(3,606)	**414,066**
Total Aset Total Assets	25,932,001	-	-	**25,932,001**
Total Liabilitas Total Liabilities	22,231,538	-	-	**22,231,538**
Kenaikan (Penurunan) / Increase (Decrease) (%)				
Pendapatan Bunga dan Syariah - Bersih Interest and Sharia Income - Net	(17.24)	(100.00)	-	**(21.09)**
Pendapatan Operasional Lainnya Other Operating Income	(32.93)	(100.00)	(100.00)	**(33.36)**
Beban Operasional Lainnya Other Operating Expenses	(5.61)	(100.00)	-	**(10.48)**
Laba/(Rugi) Operasional Profit/(Loss) from Operations	(50.23)	(100.00)	(100.00)	**(50.28)**

Uraian Description	Konvensional Conventional	Syariah Sharia	Eliminasi Elimination	Total
Total Aset Total Assets	14.24	-	-	**14.24**
Total Liabilitas Total Liabilities	16.05	-	-	**16.05**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Pada tahun 2023, segmen konvensional mencatatkan penurunan pendapatan bunga dan syariah - bersih sebesar 17,24%, dari sebelumnya Rp699,31 miliar menjadi Rp578,73 miliar. Dari sisi pendapatan operasional lainnya, segmen konvensional pada tahun 2023 menurun 32,93% dari sebelumnya mencapai Rp377,77 miliar menjadi Rp253,37 miliar.

In 2023, the conventional segment recorded a decrease in net interest and sharia income of 17.24%, from previously Rp699.31 billion to Rp578.73 billion. In terms of other operating income, the conventional segment in 2023 decreased by 32.93% from previously reaching Rp377.77 billion to Rp253.37 billion.

Dari segi profitabilitas, terjadi penurunan pada segmen konvensional sebesar 50,23% dari sebelumnya menghasilkan laba sebesar Rp413,60 miliar menjadi Rp205,87 miliar di tahun 2023. Sementara total aset dan liabilitas segmen konvensional per akhir tahun 2023 mengalami peningkatan masing-masing sebesar 14,24% dan 16,05%.

In terms of profitability, there was a decrease in the conventional segment of 50.23% from previously a profit of Rp413.60 billion to Rp205.87 billion in 2023. Meanwhile, the total assets and liabilities of the conventional segment as of the end of 2023 increased by 14.24% and 16.05%, respectively.

Segmen Geografis
Geographical Segment

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian Description	Jadetabek	Jawa Barat West Java	Jawa Tengah dan Jawa Timur Central Java and East Java	Luar Jawa Non Java	Total
2023					
Pendapatan Bunga dan Syariah - Bersih Interest and Sharia Income - Net	**605,904**	**7,713**	**(5,953)**	**(28,934)**	**578,729**
Pendapatan Operasional Lainnya Other Operating Income	**244,425**	**2,810**	**3,732**	**2,398**	**253,365**
Beban Operasional Lainnya Other Operating Expenses	**286,330**	**2,492**	**(39,104)**	**(43,849)**	**205,868**
Laba/(Rugi) Operasional Profit/(Loss) from Operations	**182,165**	**2,491**	**(39,049)**	**(43,790)**	**101,816**
Total Aset Total Assets	**28,781,507**	**245,132**	**398,883**	**198,719**	**29,624,240**
Total Liabilitas Total Liabilities	**23,861,711**	**260,086**	**756,951**	**920,707**	**25,799,455**
2022*					
Pendapatan Bunga dan Syariah - Bersih Interest and Sharia Income - Net	739,975	(410)	7,588	(13,772)	**733,381**
Pendapatan Operasional Lainnya Other Operating Income	372,687	901	4,885	1,730	**380,203**
Beban Operasional Lainnya Other Operating Expenses	468,834	(9,303)	(20,516)	(24,948)	**414,066**
Laba/(Rugi) Operasional Profit/(Loss) from Operations	280,879	(9,303)	(20,454)	(24,948)	**226,173**

Uraian Description	Jadetabek	Jawa Barat West Java	Jawa Tengah dan Jawa Timur Central Java and East Java	Luar Jawa Non Java	Total
Total Aset Total Assets	25,223,757	133,707	342,257	232,281	**25,932,001**
Total Liabilitas Total Liabilities	20,720,713	244,547	588,098	678,179	**22,231,538**
Kenaikan (Penurunan) / Increase (Decrease) (%)					
Pendapatan Bunga dan Syariah - Bersih Interest and Sharia Income - Net	(18.12)	1,979.10	(178.46)	110.10	**(21.09)**
Pendapatan Operasional Lainnya Other Operating Income	(34.42)	211.77	(23.60)	38.63	**(33.36)**
Beban Operasional Lainnya Other Operating Expenses	(38.93)	126.78	90.60	75.76	**(50.28)**
Laba/(Rugi) Operasional Profit/(Loss) from Operations	(35.14)	126.77	90.91	75.52	**(54.98)**
Total Aset Total Assets	14.10	83.34	16.54	(14.45)	**14.24**
Total Liabilitas Total Liabilities	15.16	6.35	28.71	35.76	**16.05**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Segmen geografis Bank Victoria terdiri dari 4 (empat) wilayah, yakni Jadetabek, Jawa Barat, Jawa Tengah dan Jawa Timur, serta luar Jawa. Pertimbangan untuk membagi operasi bisnis menjadi 4 (empat) segmen geografis ini didasarkan pada kondisi lingkungan yang berbeda di setiap wilayah ekonomi tersebut, yang disertai dengan jenis risiko dan peluang yang berbeda pula.

Dari segi pendapatan bunga dan syariah – bersih, wilayah Jawa Barat mencatatkan pertumbuhan tertinggi sebesar 1.979,10%, sedangkan wilayah Jadetabek, Jawa Tengah dan Jawa Timur, serta Luar Jawa mencatatkan penurunan masing-masing sebesar 18,12%, 178,46%, dan 110,10%. Dari segi profitabilitas, terjadi peningkatan tertinggi pada wilayah Jawa Barat sebesar 126,77% dari sebelumnya menghasilkan rugi sebesar Rp9,30 miliar menjadi laba sebesar Rp2,49 miliar di tahun 2023. Sementara penurunan laba pada wilayah Jadetabek sebesar 35,14% dari sebelumnya menghasilkan laba sebesar Rp280,88 miliar menjadi Rp182,17 miliar di tahun 2023.

Keempat segmen geografis ini mencatat peningkatan yang beragam nilainya pada total aset dan liabilitas masing-masing, dengan peningkatan aset tertinggi berdasarkan persentase terjadi di wilayah Jawa Barat sebesar 83,34%. Selain itu, peningkatan liabilitas terbesar juga terjadi di wilayah Luar Jawa dengan pertumbuhan sebesar 35,76%.

The geographical segment of Bank Victoria is divided into 4 (four) areas, which are Jadetabek, West Java, Central Java and East Java, and non Java. Considerations for dividing the business operations into 4 (four) geographical segments are based on different environmental conditions in each of these economic areas, which are accompanied by different types of risks and opportunities.

In terms of net interest and sharia income, West Java area recorded the highest growth of 1,979.10%, while Jadetabek, Central Java and East Java, and Outer Java areas recorded a decline of 18.12%, 178.46%, and 110.10%, respectively. In terms of profitability, there was the highest increase in West Java area of 126.77% from previously loss of Rp9.30 billion to profit of Rp2.49 billion in 2023. Meanwhile, the profits in Jadetabek area declined by 35.14%, from previously resulting a profit of Rp280.88 billion to Rp182.17 billion in 2023.

These four geographical segments recorded increases of varying values in their respective total assets and liabilities, with the highest increase in assets by percentage occurring in West Java area by 83.34%. In addition, the largest increase in liabilities also occurred in Non Java area with a growth of 35.76%.

Prospek Usaha 2024

Setelah mengalami pelambatan di tahun 2023, perekonomian global diperkirakan masih terus dibayangi berbagai risiko dan ketidakpastian. Mulai dari risiko pertumbuhan ekonomi Tiongkok yang melemah, harga komoditas yang *volatile*, geopolitik perang Ukraina-Rusia dan konflik Palestina-Israel, fragmentasi ekonomi, ancaman El Nino dan perubahan iklim, risiko *debt-distress*, kontraksi PMI Manufaktur global, serta meningkatnya harga minyak dunia. Pertumbuhan ekonomi global diperkirakan hanya tumbuh 2,8% pada tahun 2024. Berbeda dengan ekonomi global, perekonomian Indonesia diprediksi tumbuh pada kisaran 4,7%-5,5% pada tahun 2024. Perbaikan ekonomi indonesia akan terus berlanjut yang ditopang oleh konsumsi swasta yang meningkat sejalan dengan terjaganya daya beli, dukungan kebijakan fiskal dan moneter, serta makin besarnya peran generasi muda milenial.

Selain itu, kinerja investasi juga diprediksi akan meningkat seiring dengan peningkatan ekspor dan juga berlanjutnya PSN, sedangkan kinerja ekspor akan meningkat seiring dengan perbaikan prospek ekonomi global dan makin maraknya program hilirisasi di berbagai sektor. Konsistensi implementasi reformasi struktural, termasuk melalui pembangunan infrastruktur, implementasi Undang-Undang Cipta Kerja, berbagai program hilirisasi, akselerasi digitalisasi, dan penguatan sumber daya manusia akan mampu memperkuat kapasitas perekonomian sehingga ekonomi dapat tumbuh lebih tinggi tanpa memberikan tekanan yang signifikan pada stabilitas.

Sementara itu, pelonggaran juga dilakukan pada seluruh instrumen kebijakan makroprudensial yang diarahkan pada sasaran pertumbuhan kredit/pembiayaan mencapai sekitar 10%-12% pada 2024 dan 11%-13% pada 2025 dengan stabilitas sistem keuangan tetap terjaga. Arah kebijakan makroprudensial dimaksud didasarkan pada keseimbangan tiga sasaran, yaitu pertumbuhan kredit optimal, stabilitas sistem keuangan (SSK) terjaga, serta inklusi ekonomi dan keuangan. Optimalisasi ketiga sasaran ini penting untuk menjaga tetap kondusifnya keterkaitan makrofinansial, termasuk kapasitas penawaran kredit oleh perbankan, permintaan kredit dari sektor prioritas, perlunya menjaga kecukupan likuiditas, serta mitigasi risiko SSK yang dapat muncul dari volatilitas nilai tukar Rupiah dan naiknya *yield* SBN.

Sumber:
- Bank Indonesia, "Laporan Perekonomian Indonesia Tahun 2023"; dan
- Kementerian Koordinator Bidang Perekonomian Republik Indonesia, "Siaran Pers - Kejar Capaian Pertumbuhan Ekonomi di 2024, Menko Airlangga Tegaskan Pentingnya Sinergi dan Kontribusi untuk Membangun Optimisme Ekonomi Indonesia".

2024 Business Outlook

After experiencing a slowdown in 2023, the global economy is expected to continue to be shadowed by various risks and uncertainties. Such matters start from the risk of weakening Chinese economic growth, volatile commodity price, geopolitics of the Ukraine-Russia war and the Palestine-Israel conflict, economic fragmentation, threat of El Nino and climate change, risk of debt-distress, contraction of global Manufacturing PMI, as well as rising world oil prices. Global economic growth is estimated to grow only 2.8% in 2024. In contrast to global economy, the Indonesian economy is predicted to grow in the range of 4.7%-5.5% in 2024. Improvement in Indonesian economy will continue, supported by the increasing private consumption, in line with maintained purchasing power, support from fiscal and monetary policies, and increasing role of young millennial generation.

Furthermore, investment performance is also predicted to increase in line with the increase in export and the continuation of National Strategic Program (PSN), while export performance will increase in line with improvements in global economic outlook and increasing proliferation of downstream program in various sectors. Consistent implementation of structural reforms, including through infrastructure development, implementation of Job Creation Law, various downstream programs, accelerated digitalization, and strengthening human resources, will strengthen the economic capacity so as economy can grow higher without placing significant pressure on stability.

Meanwhile, loosening is also carried out on all macroprudential policy instruments aimed at targeting loan/financing growth of around 10%-12% in 2024 and 11%-13% in 2025 with financial system stability maintained. The direction of macroprudential policy is based on a balance of three targets, namely optimal loan growth, maintained financial system stability (SSK), and economic and financial inclusion. Optimizing such three targets is important to maintain conducive macrofinancial linkages, including loan supply capacity by the Bank, loan demand from priority sectors, the need to maintain adequate liquidity, and mitigate SSK risks that may arise from volatility in Rupiah exchange rate and rising Government Securities (SBN) yields.

Source:
- Bank Indonesia, "Indonesia Economic Report 2023"; and
- Coordinating Ministry for the Economy of the Republic of Indonesia, "Press Release - Pursuing Economic Growth Achievements in 2024, Coordinating Minister Airlangga Emphasizes the Importance of Synergy and Contribution to Building Optimism for the Indonesian Economy".

Strategi dan Rencana Kerja 2024

Dalam upaya menciptakan pertumbuhan yang berkelanjutan, Bank Victoria telah menetapkan target jangka pendek yang akan dicapai dalam waktu setahun ke depan dan target jangka menengah untuk 3 (tiga) tahun mendatang dengan memperhatikan visi-misi, strategi, kebijakan umum, kondisi dan kapasitas internal Bank, serta perkiraan perkembangan kondisi lingkungan eksternal pada tahun yang akan datang. Beberapa target jangka pendek yang ingin dicapai Bank Victoria diuraikan sebagai berikut:

1. Menjaga rasio kecukupan modal (CAR) di level yang kuat guna mengantisipasi potensi risiko dan pertumbuhan serta regulasi permodalan yang lebih ketat;
2. Meningkatkan pertumbuhan dana pihak ketiga dan total aset sekitar 7%-9% menyesuaikan kondisi ekonomi yang masih penuh ketidakpastian dengan potensi pelambatan;
3. Melanjutkan dan melakukan Penawaran Umum Berkelanjutan (PUB). Selain itu, Bank juga melanjutkan penerbitan negotiable certificate of deposit.
4. Mempertahankan dan meningkatkan pertumbuhan margin dengan kecenderungan naik yakni *net interest margin* dengan mengendalikan *cost of fund*;
5. Menambah jaringan kantor baru secara selektif untuk memperluas area geografis dan optimalisasi melalui evaluasi kinerja jaringan kantor cabang yang telah ada, sehingga dapat meningkatkan layanan nasabah, efisiensi, dan produktivitas;
6. Melanjutkan sinergi pengembangan bisnis dengan Grup usaha melalui pemanfaatan jaringan Kantor Cabang untuk Layanan Syariah Bank (LSB) dengan tetap memperhatikan prinsip kehati-hatian dalam pelaksanaan sinergi perbankan;
7. Melanjutkan pengembangan inovasi dan layanan produk Bank guna memenuhi dan meningkatkan kebutuhan nasabah;
8. Mengurangi agunan yang diambil alih (AYDA), serta memperbaiki kualitas kredit dengan menekan rasio NPL di akhir tahun 2024;
9. Menerapkan dan mengembangkan sistem informasi manajemen berbasis teknologi informasi dengan kualitas standar keamanan tinggi yang diharapkan bisa menghadirkan layanan yang lebih baik dan lebih aman bagi nasabah; dan
10. Mengimplementasikan konsep perbaikan GCG dan manajemen risiko yang kuat serta memadai melalui implementasi yang berkelanjutan.

Dalam jangka menengah (hingga akhir tahun 2026), Bank menetapkan beberapa target sebagai berikut:

1. Melanjutkan strategi pengembangan bisnis secara organik, terutama dengan ditopang pengembangan bisnis melalui sinergi Grup;
2. Memperbaiki struktur pendanaan khususnya komposisi dana pihak ketiga, dengan mendorong CASA (dana murah) lebih banyak, sehingga mampu menurunkan *cost of fund*;

Strategies and Work Plans in 2024

To create a sustainable growth, Bank Victoria has set short-term targets to be achieved within the next one year and medium-term targets for the next 3 (three) years with due observance of the Bank's vision-mission, strategies, general policies, conditions and internal capacity, as well as forecasts for developments in external environmental conditions to come. Several short-term targets to be achieved by Bank Victoria are outlined as follows:

1. Maintaining the capital adequacy ratio (CAR) at a strong level to anticipate potential risks and growth as well as stricter capital regulations;
2. Increasing the growth of third party funds and total assets at around 7%-9%, making adjustments to economic conditions which are still full of uncertainty with potential of slowdown;
3. Continuing and conducting a Sustainable Public Offering (PUB). Moreover, the Bank also continues to issue negotiable certificates of deposit.
4. Maintaining and increasing margin growth with an upward trend, that is net interest margin by controlling the cost of funds;
5. Adding new office networks selectively to expand geographic area and optimizing through evaluating performance of the existing branch office network, so as to improve its customer service, efficiency, and productivity;
6. Continuing business development synergy with the business group by utilizing Office network for Sharia Bank (LSB) Services while still observing the prudential principles in implementing banking synergy;
7. Continuing innovation development and Bank product services to meet and improve customer needs;
8. Reducing foreclosed assets (AYDA), and improving credit quality by reducing the net NPL ratio at the end of 2024;
9. Implementing and developing an information technology-based management information system with high quality security standards, expected to provide better and safer services for customers; and
10. Implementing the concept of GCG improvement and strong and adequate risk management through sustainable implementation.

In medium term (until the end of 2026), the Bank sets the following targets:

1. Continuing the organic business development strategy, particularly supported by business development through Group synergy;
2. Improving funding structure, particularly the composition of third party funds, by encouraging more CASA (low-cost funds), so as to reduce the cost of funds;

3. Melanjutkan komitmen penguatan GCG yang memadai, sehingga berjalan maksimal dan sesuai dengan ketentuan regulator;
4. Melanjutkan investasi strategis dalam teknologi informasi yang di antaranya peningkatan proses, kontrol, kualitas layanan, dan produktivitas di dalam aktivitas penyelenggaraan teknologi informasi dan kegiatan operasional Bank guna mendukung pertumbuhan bisnis yang berkelanjutan dengan tetap menjaga beban operasional pada tingkat yang wajar; serta
5. Menjadi lembaga keuangan yang memberikan pertumbuhan ekonomi dan bisnis yang berkesinambungan bagi seluruh masyarakat melalui layanan inklusi, memberikan dampak positif kepada masyarakat dengan meningkatkan literasi keuangan, memberikan kredit yang bertanggung jawab terhadap lingkungan, menciptakan kondisi kerja yang terbaik bagi karyawan Bank, serta menerapkan etika bisnis yang baik dengan mematuhi peraturan dan perundang-undangan yang berlaku dalam rangka mendorong keberhasilan Rencana Aksi Keuangan Berkelanjutan (RAKB).

3. Continuing the commitment in adequate strengthening of GCG so that it runs optimally and in accordance with the regulatory provisions;
4. Continuing strategic investment in information technology, among others improving processes, control, service quality, and productivity in information technology operations and the Bank's operational activities to support sustainable business growth while maintaining operating expenses at a reasonable level; and
5. Becoming a financial institution that provides sustainable economic and business growth for the entire community through inclusive services, providing a positive impact on community by increasing financial literacy, providing environmentally responsible loans, establishing best working conditions for Bank employees, and implementing good business ethics by complying with the applicable laws and regulations to encourage the success of the Sustainable Financial Action Plan (RAKB).

Tinjauan Keuangan
Financial Overview

Laporan Posisi Keuangan
Statements of Financial Position

Aset
Assets

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	2022*	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Aset Keuangan / Financial Assets					
Kas	92,821	51,897	40,924	78.86	Cash
Giro pada Bank Indonesia	1,493,077	1,506,566	(13,489)	(0.90)	Current Accounts with Bank Indonesia
Giro pada Bank Lain – Bersih	296,297	228,384	67,913	29.74	Current Account with Other Banks – Net
Penempatan pada Bank Indonesia dan Bank Lain - Bersih	915,369	858,328	57,041	6.65	Placements with Bank Indonesia and Other Banks - Net
Efek-Efek - Bersih	6,277,292	4,809,690	1,467,601	30.51	Marketable Securities - Net
Efek-Efek yang Dibeli dengan Janji Dijual Kembali	636,733	839,432	(202,700)	(24.15)	Securities Purchased under Resale Agreement
Pendapatan Bunga dan Syariah yang Masih akan Diterima – Bersih	368,408	391,680	(23,272)	(5.94)	Interest and Sharia Income Receivables – Net
Pinjaman yang Diberikan, Pembiayaan dan Piutang Syariah - Bersih	18,053,871	15,286,493	2,767,378	18.10	Loans, Sharia Financing and Receivables - Net
Tagihan Akseptasi	12,475	7,754	4,720	60.87	Acceptance Receivables
Penyertaan Saham	215,931	242,104	(26,174)	(10.81)	Investments in Shares
Aset Lain-Lain - Bersih	91,463	87,956	3,508	3.99	Other Assets - Net
Total Aset Keuangan	28,453,735	**24,310,285**	**4,143,451**	**17.04**	**Total Financial Assets**
Aset Non Keuangan / Non-Financial Assets					
Biaya Dibayar di Muka	25,465	19,715	5,750	29.17	Prepaid Expenses
Aset Pajak Tangguhan - Bersih	163,004	197,607	(34,603)	(17.51)	Deferred Tax Assets - Net
Aset Tetap dan Aset Hak Guna - Bersih	423,227	470,853	(47,626)	(10.11)	Fixed Assets and Right-of-Use Assets - Net
Aset Tak Berwujud - Bersih	8,193	2,531	5,662	223.68	Intangible Assets - Net
Agunan yang Diambil Alih - Bersih	550,616	931,010	(380,394)	(40.86)	Foreclosed Assets - Net
Total Aset Non Keuangan	1,170,505	**1,621,716**	**(451,211)**	**(27.82)**	**Total Non-Financial Assets**
Total Aset	29,624,240	**25,932,001**	**3,692,239**	**14.24**	**Total Assets**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Total Aset

Pada tahun 2023, Bank berhasil mencatatkan total aset sebesar Rp26,62 triliun, tumbuh 14,24% dibandingkan total aset tahun 2022 sebesar Rp25,93 triliun. Pertumbuhan total aset terutama disebabkan oleh meningkatnya aset keuangan Bank sebesar 17,04%.

Total Aset Keuangan

Per 31 Desember 2023, total aset keuangan Bank tercatat sebesar Rp28,45 triliun, mengalami peningkatan sebesar 17,04% dibandingkan tahun 2022 yang sebesar Rp24,31 triliun, Peningkatan tersebut terutama berasal dari pinjaman yang diberikan, pembiayaan dan piutang syariah – bersih yang meningkat sebesar 18,10%.

Total Aset Non Keuangan

Total aset non keuangan Bank di tahun 2023 tercatat mengalami penurunan sebesar 27,82% dari tahun sebelumnya sebesar Rp1,62 triliun menjadi Rp1,17 triliun. Hal tersebut dipengaruhi oleh penurunan agunan yang diambil alih – bersih sebesar 40,86%.

Total Assets

In 2023, the Bank managed to record total assets of Rp26.62 trillion, growing by 14.24% compared to total assets in 2022 of Rp25.93 trillion. The growth in total assets was mainly due to an increase in the Bank's financial assets by 17.04%.

Total Financial Assets

As of 31 December 2023, the Bank's total financial assets were recorded at Rp28.45 trillion, an increase of 17.04% compared to Rp24.31 trillion in 2022. This increase mainly came from loans, sharia financing and receivables - net that increased by 18.10%.

Total Non-Financial Assets

The Bank's total non-financial assets in 2023 decreased by 27.82% from that of the previous year of Rp1.62 trillion to Rp1.17 trillion. This was influenced by a decrease in foreclosed collateral - net of 40.86%.

Liabilitas

Liabilities

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	2022*	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Liabilitas Keuangan / Financial Liabilities					
Simpanan Nasabah	22,429,180	19,371,838	3,057,343	15.78	Deposit from Customers
Simpanan dari Bank Lain	1,104,803	1,334,953	(230,149)	(17.24)	Deposits from Other Banks
Efek-efek yang Dijual dengan Janji Dibeli Kembali	643,267	240,865	402,402	167.07	Securities Sold under Repurchase Agreement
Efek-Efek yang Diterbitkan	1,347,640	1,051,904	295,736	28.11	Securities Issued
Utang Akseptasi	11,960	-	11,960	100.00	Acceptance Payables
Akrual dan Liabilitas Lain-Lain	193,458	160,941	32,517	20.20	Accruals and Other Liabilities
Total Liabilitas Keuangan	25,730,307	**22,160,500**	**3,569,808**	**16.11**	**Total Financial Liabilities**
Liabilitas Non Keuangan / Non-Financial Liabilities					
Utang Pajak	29,310	30,841	(1,531)	(4.96)	Taxes Payable
Liabilitas Imbalan Kerja Karyawan	39,838	40,197	(359)	(0.89)	Employee Benefits Obligation
Total Liabilitas Non Keuangan	69,148	**71,038**	**(1,890)**	**(2.66)**	**Total Non-Financial Liabilities**
Total Liabilitas	25,799,455	**22,231,538**	**3,567,918**	**16.05**	**Total Liabilities**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Total Liabilitas

Total liabilitas per tahun 2023 mencapai Rp25,80 triliun, meningkat 16,05% dibandingkan dengan tahun 2022 yang mencapai Rp22,23 triliun. Peningkatan tersebut khususnya berasal dari liabilitas keuangan yang meningkat sebesar 16,11%.

Total Liabilities

The total liabilities in 2023 reached Rp25.80 trillion, an increase of 16.05% compared to in 2022 of Rp22.23 trillion. This increase mainly came from financial liabilities that increased by 16.11%.

Total Liabilitas Keuangan
Pada tanggal 31 Desember 2023, total liabilitas keuangan Bank tercatat sebesar Rp25,73 triliun, meningkat sebesar 16,11% dibandingkan tahun 2022 sebesar Rp22,16 triliun. Hal ini dipengaruhi oleh peningkatan simpanan nasabah sebesar 15,78%.

Total Financial Liabilities
On 31 December 2023, the Bank's total financial liabilities were recorded at Rp25.73 trillion, an increase of 16.11% compared to Rp22.16 trillion in 2022. This was affected by an increase in deposit from customers of 15.78%.

Total Liabilitas Non Keuangan
Pada tahun 2023, total liabilitas non keuangan tercatat menurun sebesar 2,66%, dari sebelumnya Rp71,04 miliar menjadi Rp69,15 miliar. Penurunan tersebut khususnya disebabkan oleh penurunan utang pajak sebesar 4,95%.

Total Non-Financial Liabilities
In 2023, total non-financial liabilities decreased by 2.66%, from previously Rp71.04 billion to Rp69.15 billion. This decrease was mainly due to a decrease in taxes payable of 4.95%.

Ekuitas

Equity

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	2022*	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Ekuitas yang dapat Diatribusikan kepada Pemilik Entitas Induk / Equity Attributable to Equity Holders of the Parent Entity					
Modal Saham - Nilai Nominal	1,584,824	1,584,823	0	0.00	Share Capital - Par Value
Tambahan Modal Disetor	668,685	670,585	(1,900)	(0.28)	Additional Paid-In Capital
Kerugian yang Belum Direalisasi atas Perubahan Nilai Wajar Efek-Efek yang Diukur pada Nilai Wajar melalui Penghasilan Komprehensif Lain, Setelah Pajak	(16,832)	(38,590)	(21,757)	(56.38)	Unrealised Loss on Changes in Fair Value of Marketable Securities Measured at Fair Value through Other Comprehensive Income, Net of Tax
Surplus Revaluasi Aset Tetap, Setelah Pajak	382,456	382,456	0	0.00	Gain on Revaluation of Fixed Assets, Net of Tax
Pengukuran Kembali atas Liabilitas Imbalan Kerja, Setelah Pajak	19,467	16,819	2,648	15.74	Remeasurements on Employee Benefit Liabilities, Net of Tax
Saldo Laba:					Retained Earnings:
Telah Ditentukan Penggunaannya	202,200	177,200	25,000	14.11	Appropriated
Belum Ditentukan Penggunaannya	983,986	907,170	76,816	8.47	Unappropriated
Total Ekuitas	**3,824,785**	**3,700,463**	**124,322**	**3.36**	**Total Equity**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Total Ekuitas
Total ekuitas Bank pada tahun 2023 mencapai Rp3,82 triliun, tercatat lebih tinggi 3,36% dibandingkan dengan tahun sebelumnya sebesar Rp3,70 triliun. Kondisi ini terutama dipengaruhi oleh pertumbuhan saldo laba belum ditentukan penggunaannya sebesar 8,47%.

Total Equity
The Bank's total equity in 2023 reached Rp3.82 trillion, 3.36% higher compared to that of the previous year of Rp3.70 trillion. This condition was mainly affected by the growth in unappropriated retained earnings by 8.47%.

Laporan Laba Rugi dan Penghasilan Komprehensif Lain

Statements of Profit or Loss and Other Comprehensive Income

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	2022*	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Pendapatan Bunga dan Syariah	1,836,391	1,705,018	131,373	7.71	Interest and Sharia Income
Beban Bunga dan Syariah	(1,257,662)	(971,638)	286,024	29.44	Interest and Sharia Expense
Pendapatan Bunga dan Syariah - Bersih	578,729	733,381	(154,651)	(21.09)	Interest and Sharia Income - Net
Pendapatan Operasional Lainnya	253,365	380,203	(126,838)	(33.36)	Other Operating Income
Beban Operasional Lainnya	(658,023)	(699,517)	(41,494)	(5.93)	Other Operating Expenses
Laba Operasional	174,071	414,066	(239,995)	(57.96)	Profit from Operations
Beban Non Operasional - Bersih	(44,535)	(57,136)	(12,601)	(22.05)	Non-Operating Expenses - Net
Laba Sebelum Beban Pajak Penghasilan	129,536	356,931	(227,395)	(63.71)	Profit Before Income Tax Expense
Beban Pajak Penghasilan - Bersih	(27,720)	(130,757)	(103,037)	(78.80)	Income Tax Expense - Net
Laba Bersih yang Dapat Diatribusikan kepada:	101,816	226,173	(124,357)	(54.98)	Net Income Attributable to:
Pemilik Entitas Induk	101,816	226,173	(124,357)	(54.98)	Equity Holders of the Parent Entity
Kepentingan Nonpengendali	-	-	-	-	Non-controlling Interest
Penghasilan (Rugi) Komprehensif Lain, Setelah Pajak Penghasilan	24,405	(70,239)	94,644	(134.75)	Other Comprehensive Income (Loss), Net of Income Tax
Penghasilan Komprehensif yang dapat Diatribusikan kepada:	126,222	155,935	(29,713)	(19.05)	Comprehensive Income Attributable to:
Pemilik Entitas Induk	126,222	155,935	(29,713)	(19.05)	Equity Holders of the Parent Entity
Kepentingan Nonpengendali	-	-	-	-	Non-controlling Interest
Laba Bersih per Saham yang dapat Diatribusikan kepada Pemilik Entitas Induk					Other Comprehensive Income (Loss), Net of Income Tax
Dasar (Rupiah penuh)	6.42	19.17	(12.75)	(66.51)	Basic (full Rupiah)
Dilusian (Rupiah penuh)	6.42	19.17	(12.75)	(66.51)	Diluted (full Rupiah)

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Pendapatan Bunga dan Syariah

Pendapatan bunga dan syariah Bank Victoria per 31 Desember 2023 sebesar Rp1,84 triliun, mengalami peningkatan sebesar 7,71% dibandingkan posisi per 31 Desember 2022 sebesar Rp1,71 triliun. Kondisi ini dikontribusikan oleh peningkatan pendapatan bunga sebesar 12,28%.

Beban Bunga dan Syariah

Beban bunga dan syariah Bank pada akhir periode 2023 mengalami kenaikan sebesar 29,44%, menjadi Rp1,26 triliun dari sebelumnya Rp971,64 miliar. Peningkatan tersebut bersumber dari peningkatan simpanan dana pihak ketiga yaitu deposito sebesar 29,77%.

Interest and Sharia Income

Bank Victoria's interest and sharia income as of 31 December 2023 was Rp1.84 trillion, an increase of 7.71% compared to the position as of 31 December 2022 of Rp1.71 trillion. This condition was mainly contributed by an increase in interest income by 12.28%.

Interest and Sharia Expense

The Bank's interest and sharia expense at the end of the 2023 period increased by 29.44%, to Rp1.26 trillion from previously Rp971.64 billion. This increase came from an increase in third party deposits, namely time deposits by 29.77%.

Pendapatan Bunga dan Syariah – Bersih
Pada tahun 2023, pendapatan bunga dan syariah – bersih tercatat sebesar Rp578,73 miliar, meningkat 21,09% dari tahun 2022 sebesar Rp733,38 miliar. Penurunan pendapatan bunga dan syariah – bersih utamanya disebabkan oleh beban bunga dan syariah yang meningkat sebesar 29,44%.

Interest and Sharia Income – Net
In 2023, the net interest and sharia income was recorded at Rp578.73 billion, an increase of 21.09% from Rp733.38 billion in 2022. The decrease in interest and sharia income - net was mainly due to interest and sharia expenses that increased by 29.44%.

Pendapatan Operasional Lainnya
Pada tahun 2023, pendapatan operasional lainnya tercatat mengalami penurunan sebesar 33,36% dari sebelumnya sebesar Rp380,20 miliar menjadi sebesar Rp253,37 miliar. Penurunan ini terutama dipengaruhi oleh pendapatan operasional lain-lain - bersih yang mengalami penurunan sebesar 45,80%.

Other Operating Income
In 2023, other operating income decreased by 33.36% from previously Rp380.20 billion to Rp253.37 billion. This decrease was mainly influenced by other operating income - net which decreased by 45.80%.

Beban Operasional Lainnya
Di tahun 2023, beban operasional lainnya mencapai Rp658,02 miliar, tercatat menurun 5,93% dibandingkan tahun 2022 yang mencapai Rp699,52 miliar. Penurunan tersebut berasal dari beban tenaga kerja yang menurun sebesar 3,60%.

Other Operating Expenses
In 2023, other operating expenses reached Rp658.02 billion, recorded a decrease of 5.93%, compared to Rp699.52 billion in 2022. This decrease came from personnel expenses which decreased by 3.60%.

Laba Operasional
Per 31 Desember 2023, laba operasional Bank mencapai Rp174,07 miliar. Jumlah tersebut lebih rendah 57,96% jika dibandingkan dengan periode sebelumnya sebesar Rp414,07 miliar. Penurunan laba operasional Bank bersumber dari penurunan pendapatan bunga dan syariah – bersih sebesar 21,09%.

Profit from Operations
As of 31 December 2023, the Bank's profit from operations reached Rp174.07 billion. This amount was 57.96% lower compared to that of the previous period of Rp414.07 billion. The decrease in the Bank's profit from operations came from a decrease in interest and sharia income - net by 21.09%.

Beban Non Operasional – Bersih
Beban non operasional – bersih tahun 2023 mencapai Rp44,54 miliar, menurun 22,05% dibandingkan tahun 2022 yang mencapai Rp57,14 miliar. Hal tersebut disebabkan oleh penurunan laba revaluasi valuta asing sebesar 12,30% dan penurunan rugi penjualan AYDA sebesar 16,46%.

Non-Operating Expenses - Net
Non-operating expenses – net in 2023 reached Rp44.54 billion, a decrease of 22.05% compared to that of 2022 of Rp57.14 billion. This was due to a decrease in gain on foreign exchange revaluation of 12.30% and a decrease in loss on sale of foreclosed assets of 16.46%.

Laba Sebelum Beban Pajak Penghasilan
Per akhir tahun 2023, Bank membukukan laba sebelum beban pajak penghasilan sebesar Rp129,54 miliar, lebih rendah 63,71% dari tahun sebelumnya sebesar Rp356,93 miliar. Penurunan tersebut dipengaruhi oleh laba operasional Bank yang menurun sebesar 57,96%.

Profit Before Income Tax Expense
In 2023, the Bank recorded profit before income tax expense of Rp129.54 billion, a decrease of 63.71% from that of the previous year of Rp353.93 billion. This decrease was affected by the Bank's profit from operations which decreased by 57.96%.

Beban Pajak Penghasilan – Bersih
Pada tahun 2023, beban pajak penghasilan – bersih tercatat mengalami penurunan sebesar 78,80% dari sebelumnya sebesar Rp130,76 miliar menjadi sebesar Rp27,72 miliar. Penurunan ini terutama dipengaruhi oleh penurunan pajak tangguhan.

Income Tax Expense – Net
In 2023, the income tax expense - net decreased by 78.80% from previously Rp130.76 billion to Rp27.72 billion. This decline was mainly affected by the decrease in deferred tax.

Laba Bersih Tahun Berjalan
Bank membukukan laba bersih tahun berjalan di tahun 2023 sebesar Rp101,82 miliar menurun 54,98% dibandingkan tahun sebelumnya sebesar Rp226,17 miliar. Kondisi tersebut menyebabkan laba bersih tahun berjalan yang dapat diatribusikan kepada pemilik Entitas Induk mengalami penurunan sebesar 54,98%.

Profit for the Year
The Bank recorded net profit for the year in 2023 of Rp101.82 billion, a decrease of 54.98% compared to that of the previous year of Rp226.17 billion. Such condition caused net profit for the year attributable to equity holders of the parent entity to decrease by 54.98%.

Penghasilan (Rugi) Komprehensif Lain, Setelah Pajak Penghasilan

Pada tahun 2023, Bank mencatatkan penghasilan komprehensif lain, setelah pajak penghasilan mencapai Rp24,41 miliar, mengalami peningkatan 134,75% dibandingkan dengan tahun 2022 yang mencatatkan rugi komprehensif lain, setelah pajak penghasilan sebesar Rp70,24 miliar. Peningkatan ini khususnya disebabkan oleh perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain yang meningkat sebesar 133,10%.

Other Comprehensive Income (Loss), Net of Income Tax

In 2023, the Bank recorded other comprehensive income, net of income tax, of Rp24.41 billion, an increase of 134.75% compared to that of 2022 which recorded other comprehensive loss, after income tax, of Rp70.24 billion. The increase was specifically due to changes in fair value of marketable securities measured at fair value through other comprehensive income that increased by 133.10%.

Penghasilan Komprehensif

Per 31 Desember 2023, Bank Victoria membukukan penghasilan komprehensif sebesar Rp126,22 miliar, menurun 19,05% dari tahun sebelumnya yang sebesar Rp155,94 miliar. Kondisi ini menyebabkan penghasilan komprehensif yang dapat diatribusikan kepada pemilik Entitas Induk mengalami penurunan sebesar 19,05%.

Comprehensive Income

As of 31 December 2023, Bank Victoria recorded comprehensive income of Rp126.22 billion, a decrease of 19.05% from that of the previous year of Rp155.94 billion. This condition caused comprehensive income attributable to equity holders of the Parent Entity to decrease by 19.05%.

Laporan Arus Kas / Statements of Cash Flows

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	2022*	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Arus Kas Bersih Diperoleh dari Aktivitas Operasi	1,279,308	1,057,052	222,257	21.03	Net Cash Flow Provided from Operating Activities
Arus Kas Bersih Digunakan untuk Aktivitas Investasi	(1,413,275)	(232,938)	(1,180,337)	506.72	Net Cash Flow used in Investing Activities
Arus Kas Bersih Diperoleh dari Aktivitas Pendanaan	287,343	159,950	127,393	79.65	Net Cash Flow provided from Financing Activities
Kenaikan Bersih Kas dan Setara Kas	153,376	984,064	(830,688)	(84.41)	Net Increase on Cash and Cash Equivalents
Kas dan Setara Kas pada Awal Tahun	2,645,188	1,886,562	758,625	40.21	Cash and Cash Equivalents at Beginning of the Year
Dampak Kehilangan Pengendalian Entitas Anak	-	(225,439)	225,439	(100.00)	Loss of Control on Subsidiary
Kas dan Setara Kas pada Akhir Tahun	2,798,564	2,645,188	153,376	5.80	Cash and Cash Equivalents at End of the Year

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Arus Kas Bersih Diperoleh dari Aktivitas Operasi

Arus kas bersih yang diperoleh dari aktivitas operasi selama tahun 2023 menunjukkan peningkatan sebesar 21,03% menjadi Rp1,28 triliun dibandingkan di tahun 2022 yang mencapai Rp1,06 triliun. Kondisi ini terutama disebabkan oleh peningkatan simpanan nasabah sebesar 135,20%.

Net Cash Flow Provided from Operating Activities

Net cash flow provided from operating activities in 2023 showed an increase of 21.03% to Rp1.28 trillion compared to that of 2022 of Rp1.06 trillion. This condition was mainly due to an increase in deposits from customers by 135.20%.

Arus Kas Bersih Digunakan untuk Aktivitas Investasi

Arus kas bersih digunakan untuk aktivitas investasi meningkat sebesar 506,72% dari Rp232,94 miliar pada tahun 2022 menjadi Rp1,41 triliun pada tahun 2023. Hal ini khususnya dipengaruhi oleh peningkatan penjualan efek-efek sebesar 495,96%.

Net Cash Flow used in Investing Activities

Net cash flow used in investing activities increased by 506.72% from Rp232.94 billion in 2022 to Rp1.41 trillion in 2023. This was specifically due to an increase in sale of marketable securities by 495.96%.

Arus Kas Bersih Diperoleh dari Aktivitas Pendanaan
Pada tahun 2023, arus kas bersih diperoleh dari aktivitas pendanaan Bank mencapai Rp287,34 miliar, mengalami peningkatan sebesar 79,65%% dibandingkan dengan tahun 2022 sebesar Rp159,95 miliar. Peningkatan tersebut bersumber dari penerbitan obligasi sebesar Rp500,00 miliar.

Net Cash Flow provided from Financing Activities
In 2023, net cash flow provided from the Bank's financing activities reached Rp287.34 billion, an increase of 79.65% compared to Rp159.95 billion in 2022. This increase came from bonds issuance of Rp500.00 billion.

Rasio Keuangan Penting

Bank berupaya memenuhi rasio-rasio keuangan sesuai dengan ketentuan yang telah ditetapkan oleh Otoritas Jasa Keuangan, Bank Indonesia, dan peraturan terkait lainnya. Adapun informasi terkait rasio-rasio keuangan Bank untuk tahun 2022 dan 2023 disajikan dalam tabel berikut:

Significant Financial Ratios

The Bank strives to fulfill financial ratios in accordance with the provisions set by the Financial Services Authority, Bank Indonesia, and other relevant regulations. Information related to the Bank's financial ratios for 2022 and 2023 is presented in the following table:

Tabel Rasio Keuangan Penting*
Table of Significant Financial Ratios*

(dalam % / in %)

Uraian	2023	2022	Description
Rasio Kinerja / Performance Ratio			
Kewajiban Penyediaan Modal Minimum (KPMM) untuk Risiko Kredit, Operasional, dan Pasar	19.95	21.97	Capital Adequacy Ratio (CAR) for Credit, Operational, and Market Risks
Aset Produktif Bermasalah dan Aset Non-Produktif Bermasalah terhadap Total Aset Produktif dan Non-Produktif	3.91	5.89	Non-Performing Earning Assets and Non-Performing Non-Earning Assets to Total Earning Assets and Non-Earning Assets
Aset Produktif Bermasalah terhadap Total Aset Produktif	2.79	3.19	Non-Performing Earning Assets to Total Earning Assets
Cadangan Kerugian Penurunan Nilai (CKPN) Aset Keuangan terhadap Aset Produktif	2.19	2.49	Allowance for Impairment Losses (CKPN) of Financial Assets to Earning Assets
NPL Bruto	3.99	4.23	Gross NPL
NPL Neto	3.24	3.42	Net NPL
Imbal Hasil atas Aset (ROA)	0.48	1.47	Return on Assets (ROA)
Imbal Hasil atas Ekuitas (ROE)	3.12	9.48	Return on Equity (ROE)
Margin Bunga Bersih (NIM)	2.58	3.52	Net Interest Margin (NIM)
Beban Operasional terhadap Pendapatan Operasional (BOPO)	91.67	79.44	Operating Expenses to Operating Income (BOPO)
Cost to Income Ratio (CIR)	46.15	35.98	Cost to Income Ratio (CIR)
Rasio Pinjaman terhadap Dana Pihak Ketiga (LDR)	83.06	81.69	Loan to Deposit Ratio (LDR)
LR secara Individual	10.34	11.65	Individual LR
Rasio Pinjaman terhadap Pendanaan (LFR)	50.55	81.08	Loan to Funding Ratio (LFR)
Rasio Dana Murah (CASA)	23.93	28.56	Low-Cost Funding Ratio (CASA)
Rasio Kepatuhan / Compliance Ratios			
Persentase Pelanggaran BMPK			Percentage of LLL Violation
Pihak Terkait	0.00	0.00	Related Parties
Pihak Tidak Terkait	0.00	0.00	Non-Related Parties
Persentase Pelampauan BMPK			Percentage of LLL Excess
Pihak Terkait	0.00	0.00	Related Parties
Pihak Tidak Terkait	0.00	0.00	Non-Related Parties
Giro Wajib Minimum (GWM) Bank Umum - Konvensional			Minimum Statutory Reserve (GWM) of Commercial Bank - Conventional

Uraian	2023	2022	Description
Rupiah			Rupiah
GWM Wajib Minimum**	7.32	7.69	Minimum Statutory GWM**
Penyangga Likuiditas Makroprudensial***	23.73	22.82	Macroprudential Liquidity Buffer***
Rasio Intermediasi Makroprudensial****	(1.01)	(2.49)	Macroprudential Intermediation Ratio****
Valuta Asing	4.05	4.05	Foreign Currencies

* Merupakan angka PT Bank Victoria International Tbk (Entitas Induk saja) / The figure is of PT Bank Victoria International Tbk (Parent Entity only).
** Sebelumnya Giro Wajib Minimum Primer / Previously Primary Minimum Statutory Reserve.
*** Sebelumnya Giro Wajib Minimum Sekunder / Previously Secondary Minimum Statutory Reserve.
**** Sebelumnya Giro Wajib Minimum LFR / Previously Loan to Funding Ratio Minimum Statutory Reserve.

Kemampuan Membayar Utang dan Kolektibilitas Piutang

Bank mengukur kemampuannya dalam memenuhi seluruh kewajiban, baik jangka pendek maupun jangka panjang dengan menggunakan rasio likuiditas, rasio solvabilitas, dan rasio rentabilitas. Bank senantiasa memantau rasio-rasio tersebut yang berperan sebagai parameter dalam mengukur kemampuannya dalam menyediakan cadangan likuiditas. Pada tahun 2023 kinerja rasio keuangan Bank Viictoria diuraikan sebagai berikut:

1. **Rasio Likuiditas**
   Bank Victoria melakukan pengukuran tingkat likuiditas menggunakan rasio pinjaman terhadap dana pihak ketiga (*loan to deposit ratio*/LDR). Pada tahun 2023, rasio LDR Bank mencapai 83,06%, lebih tinggi dibandingkan dengan tahun 2022 mencapai 81,69%. Pencapaian rasio ini mencerminkan bahwa kondisi likuiditas Bank Victoria berada dalam posisi optimal dan sehat, karena masih berada dalam batas ketentuan Bank Indonesia.

2. **Rasio Solvabilitas**
   Salah satu parameter yang digunakan Bank dalam mengukur rasio solvabilitas tercermin dari rasio kewajiban penyediaan modal minimum (KPMM) untuk memastikan terpenuhinya risiko kredit, risiko operasional, dan risiko pasar. Pada tahun 2023, rasio KPMM Bank Victoria mencapai 19,95%, mengalami penurunan jika dibandingkan dengan tahun tahun sebelumnya yang mencapai 21,97%. Berdasarkan hal tersebut, permodalan Bank dapat dikatakan masih berada dalam kondisi yang cukup baik karena nilai rasio KPPM masih berada di atas ketentuan yang ditetapkan.

3. **Rasio Kepatuhan**
   Pada tahun 2023, rasio GWM primer Bank (bank konvensional) tercatat sebesar 7,32% untuk mata uang Rupiah dan 4,05% untuk valuta asing serta rasio GWM RIM untuk Bank (bank konvensional) adalah -1,01%. Sementara itu, untuk rasio GWM PLM Bank sebesar 23,73%. GWM PLM/Sekunder yang dimiliki Bank dalam bentuk Sertifikat Bank Indonesia (SBI), Surat Utang Negara (SUN), Surat Berharga Syariah Negara (SBSN), dan/atau kelebihan saldo rekening Giro Rupiah Bank dari GWM primer dan GWM RIM/LFR. Bank telah memenuhi peraturan Bank Indonesia yang berlaku tentang GWM bank umum konvensional pada 31 Desember 2023 dan 2022.

Solvency and Receivables Collectability

The Bank measures its ability to meet all obligations, both short-term and long term, by using liquidity ratio, solvency ratio, and profitability ratio. The Bank always monitors these ratios acting as parameters in measuring its ability to provide liquidity reserves. In 2023, Bank Victoria's financial ratio performance is described as follows:

1. **Liquidity Ratio**
   Bank Victoria measures the liquidity level by using loan to deposit ratio (LDR). In 2023, the Bank's LDR ratio reached 83.06%, higher than that of 2022 of 81.69%. The ratio achievement reflects that Bank Victoria's liquidity condition is in an optimal and sound position, because it is still within the limits of Bank Indonesia regulations.

2. **Solvency Ratio**
   One parameter used by the Bank in measuring the solvency ratio is reflected in the capital adequacy ratio (CAR) to ensure that credit risk, operational risk, and market risk are fulfilled. In 2023, Bank Victoria's CAR ratio reached 19.95%, a decrease compared to that of the previous year of 21.97%. Based on such matter, it can be said that the Bank's capital is still in fairly good condition as the CAR ratio value is still above the stipulated provisions.

3. **Compliance Ratio**
   In 2023, the Bank's primary GWM ratio (conventional bank) was recorded at 7.32% for Rupiah currency and 4.05% for foreign currency, and the GWM RIM ratio for the Bank (conventional bank) was -1.01%. Meanwhile, the Bank's GWM PLM ratio was 23.73%. GWM PLM/Secondary maintained by the Bank comprised of Certificates of Bank Indonesia ("SBI"), Government Debenture Debt ("SUN"), Sharia Government Securities ("SBSN"), and/or excess reserve of the Bank's demand deposits in Rupiah over the primary GWM and GWM RIM/LFR. The Bank has complied with the applicable Bank Indonesia regulations on GMW of conventional commercial banks as of 31 December 2023 and 2022.

4. Rasio Rentabilitas

Bank menggunakan rasio-rasio kinerja laba seperti rasio imbal hasil atas aset (ROA), rasio imbal hasil atas ekuitas (ROE), rasio margin bunga bersih (NIM), dan rasio beban operasional terhadap pendapatan operasional (BOPO) untuk mengukur seberapa efektif Bank dalam menghasilkan keuntungan dari modal yang ditanamkan atau dari aset yang dimiliki. Pencapaian rasio ROA, rasio ROE, rasio NIM, dan rasio BOPO pada tahun 2023 masing-masing sebesar 0,48%, 3,12%, 2,58%, dan 91,67%. Sedangkan, pada tahun sebelumnya masing-masing sebesar 1,47%, 9,48%, 3,52%, dan 79,44%.

4. Profitability Ratio

The Bank uses profit performance ratios such as return on assets (ROA), return on equity (ROE), net interest margin (NIM) ratio, and operating expenses to operating income (BOPO) ratio to measure the Bank's effectiveness in generating profits from invested capital or from assets owned. The achievement of ROA ratio, ROE ratio, NIM ratio, and BOPO ratio in 2023 were 0.48%, 3.12%, 2.58%, and 91.67%, respectively. Meanwhile, in the previous year, they were 1.47%, 9.48%, 3.52%, and 79.44%, respectively.

5. Kemampuan Membayar Utang dari Obligasi yang Diterbitkan

Kemampuan membayar utang Bank juga dapat tercermin dari peringkat pada efek-efek yang diterbitkan Bank Victoria, yaitu Obligasi. Guna mendukung kelayakan, efek-efek yang diterbitkan secara rutin dinilai oleh lembaga pemeringkatan. Kualitas efek sangat ditentukan oleh kemampuan perusahaan penerbit efek dalam membayar efeknya pada saat jatuh tempo dan kemampuannya membayar bunga atau kupon selama jangka waktu penerbitan efek tersebut. Obligasi yang diterbitkan oleh Bank Victoria dicatatkan di Bursa Efek Indonesia.

5. Ability to Pay Debt from Bonds Issued

The Bank's ability to pay debt can also be reflected based on the rating of securities issued by Bank Victoria, which are Bonds. In order to support the worthiness, the securities issued are assessed routinely by a rating agency. The quality of securities is highly determined by the capability of the securities issuance company in paying its securities on the maturity date and its ability to pay interest or coupon throughout the issuance time period of the securities. Bonds issued by Bank Victoria are listed on Indonesia Stock Exchange.

6. Kolektibilitas Piutang

Tingkat kolektibilitas piutang Bank dapat dilihat dari nilai rasio *non performing loan* (NPL). Rasio NPL menjadi tolak ukur untuk melihat seberapa besar kredit yang bermasalah atau macet dari seluruh kredit yang diberikan bank kepada nasabah. Semakin kecil nilai NPL, maka *performance* Bank dalam kolektibilitas piutang semakin baik dan menunjukkan kualitas kredit yang baik. Bank Victoria mencatatkan NPL bruto dan NPL neto masing-masing sebesar 3,99% dan 3,24% pada akhir tahun buku 2023. Kondisi ini mengalami penurunan jika dibandingkan tahun 2022 masing-masing sebesar 4,23% dan 3,42%. Nilai tersebut masih berada di bawah ketentuan Bank Indonesia yaitu NPL neto maksimal sebesar 5,00%. Berdasarkan kolektabilitas sesuai peraturan Bank Indonesia, pinjaman yang dikelola Bank diklasifikasikan sebagai berikut:

6. Receivables Collectability

The collectability level of the Bank receivables can be seen from the non-performing loan (NPL) ratio. The NPL ratio is a benchmark to observe how big the non-performing loans or loss of all loans given by the Bank to customers. The smaller the NPL value, the better the Bank's performance in receivable collectability, and thus, it shows good credit quality. Bank Victoria recorded gross NPL and net NPL of 3.99% and 3.24%, respectively, at the end of the 2023 fiscal year. This condition decreased when compared to in 2022 of 4.23% and 3.42%, respectively. This value is still below Bank Indonesia regulation, which is a maximum net NPL of 5.00%. Based on the collectability according to Bank Indonesia regulation, loans managed by the Bank are classified as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian	2023		2022*		Description
	Pokok Principal	Cadangan Allowance	Pokok Principal	Cadangan Allowance	
Lancar	16,853,533	(188,688)	13,891,816	(127,059)	Current
Dalam Perhatian Khusus	1,031,747	(246,323)	1,264,168	(283,615)	Special Mention
Kurang Lancar	92,773	(44,668)	75,569	(31,722)	Substandard
Diragukan	17,420	(4,529)	77,449	(25,271)	Doubtful
Macet	633,270	(90,665)	515,608	(70,450)	Loss
Total	18,628,743	(574,872)	**15,824,611**	**(538,118)**	**Total**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022. / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Kontribusi kepada Negara

Kontribusi Bank Victoria kepada negara tercermin melalui pembayaran kewajiban perpajakan yang berkenaan dengan pelaksanaan operasi bisnis Bank. Informasi terkait pembayran pajak Bank selama 2 (dua) tahun terakhir diungkapkan sebagai berikut:

Contribution to the State

Bank Victoria's contribution to the state is reflected through the payment of tax obligations relating to the implementation of the Bank's business operations. Information regarding the Bank's tax payment for the past 2 (two) years is described as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian	2023	2022	Description
PPh Pasal 4 ayat 2	217,418	159,476	Income Tax Article 4 (2)
PPh Pasal 21	19,377	22,134	Income Tax Article 21
PPh Pasal 23	765	554	Income Tax Article 23
PPh Pasal 25	-	-	Income Tax Article 25
PPh Pasal 26	250	220	Income Tax Article 26
PPN	7,189	2,192	VAT
Amnesti Pajak	-	-	Tax Amnesty
Total	**244,999**	**184,576**	**Total**

Struktur Modal dan Kebijakan Struktur Modal

Kebijakan Manajemen atas Struktur Modal dan Dasar Pemilihannya

Bank Victoria memiliki kebijakan atas pengelolaan modal untuk untuk memastikan bahwa Bank memiliki modal yang kuat guna mendukung strategi pengembangan ekspansi usaha sekarang dan mempertahankan kelangsungan pengembangan di masa mendatang. Di samping itu, penetapan kebijakan permodalan ditujukan untuk pemenuhan ketentuan kecukupan permodalan yang ditetapkan oleh regulator serta memastikan agar struktur permodalan Bank telah efisien.

Bank secara rutin menyusun rencana permodalan berdasarkan penilaian dari penelaahan atas kebutuhan kecukupan permodalan yang dipersyaratkan dan mengkombinasikannya dengan tinjauan perkembangan ekonomi terkini. Rencana permodalan tersebut disusun oleh Direksi sebagai bagian dari Rencana Bisnis Bank dan disetujui oleh Dewan Komisaris. Selain itu, Bank juga telah mematuhi seluruh persyaratan modal yang ditetapkan oleh pihak eksternal sepanjang periode pelaporan, khususnya berkenaan dengan perhitungan Kewajiban Penyediaan Modal Minimum (KPMM) dan Aktiva Tertimbang Menurut Risiko (ATMR).

Rincian Struktur Modal

Perhitungan kecukupan modal dilakukan berdasarkan ketentuan Bank Indonesia yang berlaku, di mana modal yang dimiliki diklasifikasikan dalam 2 *Tier* yaitu Modal *Tier* I dan Modal *Tier* II. Kewajiban penyediaan modal Bank ditentukan dengan memperhitungkan risiko kredit, risiko operasional, dan risiko pasar. Rincian struktur modal Bank Victoria per 31 Desember 2022 dan 2023 disajikan dalam tabel berikut:

Capital Structure and Capital Structure Policy

Management Policy on Capital Structure and Basis of Selection

Bank Victoria has a capital management policy to ensure that the Bank has strong capital to support current business expansion development strategies and maintain continuity of future development. In addition, the establishment of capital policy is aimed at fulfilling the capital adequacy requirements set by the regulators and ensuring that the Bank's capital structure has been efficient.

The Bank periodically prepares the capital plan based on the review of capital adequacy requirement assessment and combines them with review of the latest economic development. The Capital Plan is prepared by the Board of Directors as part of the Bank's Business Plan and approved by the Board of Commissioners. In addition, the Bank has complied with all capital requirements stipulated by external parties throughout the reporting period, specifically related to the calculation of Capital Adequacy Ratio (CAR) and Risk Weighted Assets (RWA).

Details of Capital Structure

Capital adequacy is calculated based on the applicable Bank Indonesia regulations, where the capital owned is classified in 2 Tiers, namely Tier I Capital and Tier II Capital. The Bank's obligations for capital provision is determined by calculating credit risk, operational risk, and market risk. Details of Bank Victoria's capital structure as of 31 December 2022 and 2023 are presented in the following table:

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	2023	2022	Description
Modal			Capital
Tier I	3,287,238	3,201,440	Tier I
Tier II	532,853	674,675	Tier II
Total Modal	3,820,092	3,876,115	Total Capital
ATMR untuk Risiko Kredit	16,999,049	16,177,645	RWA for Credit Risk
ATMR untuk Risiko Operasional	1,466,732	984,239	RWA for Operational Risk
ATMR untuk Risiko Pasar	685,119	478,131	RWA for Market Risk
Rasio KPMM untuk Risiko Kredit dan Risiko Operasional (%)	20.69	22.59	CAR Ratio with Credit and Operational Risks (%)
Rasio KPMM untuk Risiko Kredit, Risiko Operasional, dan Risiko Pasar (%)	19.95	21.97	CAR Ratio with Credit, Operational, and Market Risks (%)
Rasio KPMM yang Diwajibkan (%)	8.00	**8.00**	**CAR Ratio Required (%)**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022. / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Ikatan Material terkait Investasi Barang Modal

Pada tahun 2023, Bank Victoria tidak melakukan ikatan material dengan pihak terkait dalam rangka investasi barang modal.

Material Commitments related to Capital Goods Investment

In 2023, Bank Victoria did not enter into any material commitments with related parties in capital goods investment.

Realisasi Investasi Barang Modal

Pada tahun 2023, Bank melakukan investasi barang modal untuk membeli sejumlah aset tetap atau menambah nilai aset tetap dengan tujuan untuk memenuhi kebutuhan kegiatan operasional dan sejalan dengan pertumbuhan bisnis yang berkelanjutan. Adapun informasi terkait nilai realisasi investasi barang modal yang dilakukan Bank pada tahun 2023 diuraikan sebagai berikut:

Realization of Capital Goods Investment

In 2023, the Bank invested in capital goods to purchase a number of fixed assets or increase the value of fixed assets with the aim of meeting operational activity needs and in line with sustainable business growth. Information regarding the realization value of capital goods investments made by the Bank in 2023 is described as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian	2023	2022	Description
Bangunan	1,613	-	Buildings
Kendaraan Bermotor	2,099	-	Vehicles
Mesin-Mesin dan Peralatan	12,080	7,236	Machinery and Equipment
Perlengkapan dan Perabotan Kantor	399	285	Office Furniture and Equipment
Aset Tetap dalam Proses Pembangunan	5	5	Assets under Constructions
Total	16,196	**7,527**	**Total**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Derivatif dan Fasilitas Lindung Nilai

Bank Victoria tidak memiliki transaksi keuangan derivatif dan fasilitas lindung nilai dalam 2 (dua) tahun terakhir.

Derivative and Hedging Facilities

Bank Victoria does not have any derivative financial transactions or hedging facilities in the last 2 (two) years.

Dampak Perubahan Tingkat Suku Bunga terhadap Kinerja Bank Tahun 2023

Di sepanjang tahun 2023, suku bunga acuan atau BI 7-*Day Reverse Repo Rate* (BI7DRR) telah mengalami perubahan sebanyak 2 kali. Di mulai dari Januari 2023, suku bunga acuan mengalami kenaikan dari 5,00% menjadi 5,75%. Kemudian pada Oktober 2023, suku bunga acuan kembali mengalami kenaikan dari 5,75% menjadi 6,00%. Hingga Desember tahun 2023, Bank Indonesia memutuskan untuk mempertahankan suku bunga acuan berada di level 6,00%. Keputusan perubahan suku bunga yang lebih terukur tersebut sebagai fokus kebijakan moneter yang *pro-stability* yaitu untuk penguatan stabilisasi nilai tukar Rupiah serta langkah *pre-emptive* dan *forward looking* untuk memastikan inflasi tetap terkendali dalam sasaran 2,5±1%.

Impact of Changes of Interest Rates to Bank Performance in 2023

Throughout 2023, the benchmark interest rate or BI 7-Day Reverse Repo Rate (BI7DRR) changed 2 times. Starting from January 2023, the benchmark interest rate increased from 5.00% to 5.75%. Then in October 2023, the benchmark interest rate increased again from 5.75% to 6.00%. Until December 2023, Bank Indonesia decided to maintain the benchmark interest rate at the level of 6.00%. Such more measured decision to change interest rates is the focus of pro-stability monetary policy, to strengthen the stabilization of Rupiah exchange rate as well as pre-emptive and forward looking steps to ensure inflation remains under control within the target of 2.5±1%.

Perbandingan Target dan Realisasi Tahun 2023

Bank telah menetapkan sejumlah target yang ingin dicapai dalam Rencana Bisnis Bank (RBB) dengan memperhatikan kondisi yang terjadi sepanjang tahun berjalan. Adapun target yang ingin dicapai Bank berserta realisasi pencapaian target pada tahun 2023 diuraikan sebagai berikut:

Comparison of Target and Realization in 2023

The Bank set a number of targets to be achieved in the Bank's Business Plan (RBB) with due observance of the conditions that occurred throughout the year. Targets to be achieved by the Bank, along with the realization of target achievements in 2023 are outlined as follows:

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian	Target RBB RBB Target 2023*	Realisasi Realization 2023	Pencapaian Achievement (%)	Description
Kinerja Keuangan / Financial Performance				
Total Aset	27,869	29,624	106.30	Total Assets
Total Liabilitas	23,956	25,799	107.70	Total Liabilities
Total Ekuitas	3,913	3,825	97.75	Total Equity
Pendapatan Bunga – Bersih	601	579	96.34	Interest Income – Net
Pendapatan (Beban) Operasional selain Bunga – Bersih	238	(405)	(170.17)	Operating Income (Expenses) other than Interest – Net
Laba (Rugi) Operasional	285	174	61.05	Profit (Loss) from Operations
Laba (Rugi) Tahun Berjalan	166	102	61.45	Profit (Loss) For the Year
Rasio Keuangan (dalam %) / Financial Ratios (in %)				
KPMM dengan Memperhitungkan Risiko Kredit dan Operasional	22.44	20.69	92.20	CAR by Calculating Credit and Operational Risks
KPMM dengan Memperhitungkan Risiko Kredit, Operasional, dan Pasar	21.83	19.95	91.39	CAR by Calculating Credit, Operational, and Market Risks
Margin Pendapatan Bunga Bersih (NIM)	2.75	2.58	93.82	Net Interest Margin (NIM)
Rasio Kredit terhadap Dana Pihak Ketiga (LDR)	84.62	83.06	98.16	Loan to Deposit (LDR) Ratio
Rasio Tingkat Pengambilan Aset (ROA)	0.77	0.48	62.34	Return on Assets (ROA)
Rasio Tingkat Pengembalian Ekuitas (ROE)	5.05	3.12	61.78	Return on Equity (ROE)
Rasio Kredit Bermasalah (NPL Bruto)	3.56	3.99	112.08	Non-Performing Loan (NPL Gross) Ratio
Rasio Belanja Operasional terhadap Pendapatan Operasional (BOPO)	85.93	91.67	106.68	Ratio of Operating Expenses to Operating Income (BOPO)

Uraian	Target RBB RBB Target 2023*	Realisasi Realization 2023	Pencapaian Achievement (%)	Description
Kinerja Operasional / Operational Performance				
Produk Simpanan				Deposits Products
Tabungan	2,384	2,882	120.89	Savings Deposits
Giro	3,728	2,485	66.66	Demand Deposits
Deposito Berjangka	14,464	16,669	115.24	Time Deposits
Negotiable Certificate Deposits	474	394	83.12	Negotiable Certificate Deposits
Total Produk Simpanan	**21,050**	22,429	**106.55**	**Total Deposits Products**
Produk Pinjaman				Loan Products
Pinjaman Tetap	10,242	9,698	94.69	Fixed Loans
Pinjaman Konsumen	166	165	99.40	Consumer Loans
Pinjaman Rekening Koran	2,124	1,872	88.14	Overdraft Loans
Pinjaman Tetap dengan Angsuran	5,253	6,864	130.67	Fixed Loans with Installments
Pinjaman Serba Guna	28	31	110.71	Other Loans
Total Produk Pinjaman	**17,813**	18,629	**104.58**	**Total Loan Products**

* Merupakan angka PT Bank Victoria International Tbk (induk saja) / The figure is for PT Bank Victoria International Tbk (parent only).

Proyeksi Tahun 2024

Bank Victoria telah menyusun Rencana Bisnis Bank tahun 2024-2026 dengan target pencapaian kinerja tahun 2024 yang ditunjukkan sebagai berikut:

Projections for 2024

Bank Victoria has developed the Bank's Business Plans of 2024-2026 with performance achievement targets of 2024 shown as follows:

(dalam miliar Rupiah, kecuali dinyatakan lain / / in billion Rupiah, unless stated otherwise)

Uraian	Proyeksi RBB RBB Projection* 2024*	Description
Ringkasan Neraca / Summary of Balance Sheet		
Total Aset		**Total Assets**
Penempatan pada Bank Indonesia	2,066	Placements with Bank Indonesia
Efek-Efek	6,392	Marketable Securities
Kredit yang Diberikan	20,037	Loans
Penyertaan Saham	232	Investments in Shares
Agunan yang Diambil Alih	171	Foreclosed Assets
Komponen Aset Lainnya	1,102	Other Components of Assets
Total Liabilitas	25,921	**Total Liabilities**
Total Dana Pihak Ketiga	23,079	Total Third-Party Funds
Giro	3,035	Demand Deposits
Tabungan	3,426	Savings Deposits
Deposito	16,618	Time Deposits
Efek-Efek yang Diterbitkan	2,294	Securities Issued
Komponen Liabilitas Lainnya	548	Other Components of Liability

Uraian	Proyeksi RBB RBB Projection* 2024*	Description
Total Ekuitas	4,079	**Total Equity**
Modal Disetor dan Tambahan Modal Disetor	2,253	Paid-In Capital and Additional Paid-In Capital
Akumulasi Laba/(Rugi)	1,426	Accumulated Profit/(Loss)
Komponen Ekuitas Lainnya	400	Other Equity Components
Ringkasan Laba/(Rugi) / Summary of Profit/(Loss)		
Pendapatan dan Beban Bunga – Bersih	625	Interest Income and Expenses – Net
Pendapatan/(Beban) Operasional Selain Bunga –Bersih	(328)	Operating Income/(Expenses) Other than Interest – Net
Laba/(Rugi) Operasional	287	Profit/(Loss) from Operations
Pendapatan/(Beban) Non-Operasional – Bersih	(43)	Non-Operating Income/(Expenses) - Net
Laba/(Rugi) Sebelum Beban Pajak Penghasilan	244	Profit/(Loss) before Income Tax Expense
Beban Pajak Penghasilan – Bersih	(52)	Income Tax Expense – Net
Laba/(Rugi) Setelah Beban Pajak Penghasilan	192	Profit/(Loss) Net of Income Tax Expense
Kebijakan Dividen / Dividend Policy		
Dividen yang Dibagikan	0	Dividends Distributed
Struktur Modal / Capital Structure		
KPMM untuk Risiko Kredit, Risiko Operasional, dan Risiko Pasar (%)	22.80	CAR for Credit Risk, Operational Risk, and Market Risk (%)
Total Kantor / Total Offices		
Kantor Cabang	14	Branch Offices
Kantor Cabang Pembantu	24	Sub-Branch Offices
Jaringan Kantor Lain (Kantor Kas, *Payment Point*, dan Lainnya)	0	Other Office Network (Cash Office, Payment Point, and Others)

* Merupakan angka PT Bank Victoria International Tbk (induk saja) / The figure is for PT Bank Victoria International Tbk (parent only).

Asumsi dalam Menyusun Proyeksi

Dalam menyusun proyeksi keuangan Bank Victoria untuk tahun 2024, Bank menggunakan asumsi makro dan mikro yang disesuaikan dengan kondisi perekonomian saat ini dan perkiraan di masa depan, termasuk asumsi pada Anggaran Pendapatan dan Belanja Negara (APBN) tahun 2024 dan siaran pers Bank Indonesia. Adapun asumsi makro dan mikro yang digunakan untuk proyeksi keuangan dalam penyusunan Rencana Bisnis Bank untuk tahun 2024-2026 sebagai berikut:

Assumptions in Preparing Projections

In preparing Bank Victoria's financial projections for 2024, the Bank uses macro and micro assumptions, adjusted to current economic conditions and future estimates, including assumptions in the 2024 State Budget (APBN) and Bank Indonesia press releases. The macro and micro assumptions used in financial projections in preparing the Bank's Business Plan for 2024-2026 are as follows:

(dalam % / In %)

Uraian	Proyeksi Projections			Description
	2024	2025	2026	
Asumsi Makro / Macro Assumptions				
Pertumbuhan PDB	4.70-5.30	4.90-5.70	4.90-5.50	GDP Growth
Inflasi	3.50	3.50	3.50	Inflation
Kurs IDR/USD	14,800	14,800	14,800	Exchange Rate of IDR/USD

Uraian	Proyeksi Projections			Description
	2024	2025	2026	
BI 7 *Days Rate*	5.25-5.50	5.25-5.50	5.50-5.75	BI 7 Days Rate
Asumsi Mikro / Micro Assumptions				
Pertumbuhan Kredit	7-9	8-10	8-10	Loan Growth
Pertumbuhan Dana Pihak Ketiga	8-10	9-11	9-11	Third-Party Funds Growth
Tingkat Bunga Simpanan Tabungan	3.00-7.50	2.50-7.00	2.50-7.00	Interest Rate on Savings Deposits
Tingkat Bunga Kredit Ritel Komersil	10.50-13.50	10.50-13.50	10.50-13.50	Commercial Retail Loan Interest Rates

Strategi Pengembangan Bisnis ke Depan

Bank Victoria telah merancang strategi dan rencana pengembangan bisnis dalam rangka menggapai kinerja yang positif secara berkelanjutan di masa depan dengan mengacu pada arah kebijakan Bank serta sejalan dengan penetapan tema Rencana Bisnis Bank 2024 yaitu "*Continuous Transformation with Strong Governance and Excellence Services for Sustainable Growth*" yang dijabarkan sebagai berikut:

1. Menjaga dan memperkuat penerapan prinsip-prinsip GCG secara konsisten yang selaras dengan prinsip-prinsip manajemen risiko dan kepatuhan terhadap regulasi (*compliance*);
2. Menjaga dan memelihara permodalan di level yang kuat dan memadai sebagai landasan pengembangan dan pertumbuhan skala bisnis Bank yang *prudent* dan berkelanjutan;
3. Melanjutkan dan meningkatkan inovasi produk dan layanan terbaik yang fokus kepada nasabah (*customer-centric*);
4. Melanjutkan pengembangan sistem teknologi informasi untuk mendukung efisiensi, inovasi dan pengembangan produk, serta peningkatan layanan;
5. Melanjutkan optimalisasi melalui evaluasi kinerja jaringan kantor cabang guna meningkatkan efisiensi dan produktivitas dalam rangka mencapai pertumbuhan bisnis yang berkelanjutan;
6. Mengembangkan kualitas dan meningkatkan produktivitas sumber daya manusia dan pelayanan nasabah untuk menghadapi tantangan bisnis; dan
7. Meningkatkan nilai perusahaan bagi Pemegang Saham dan pemangku kepentingan.

Future Business Development Strategies

Bank Victoria has designed strategy and business development plan to achieve sustainable positive performance in the future by referring to the Bank's policy direction and in line with the determination of the theme of the 2024 Bank Business Plan, which was "Continuous Transformation with Strong Governance and Excellence Services for Sustainable Growth", outlined as follows:

1. Maintaining and strengthening the consistent application of GCG principles, which are in line with risk management principles and regulatory compliance;
2. Maintaining and fostering capital at a strong and adequate level as a basis for prudent and sustainable development and growth of the Bank's business scale;
3. Continuing and improving product innovation and best services that focus on customers (customer-centric);
4. Continuing the development of information technology systems to support efficiency, innovation and product development, as well as service improvements;
5. Continuing optimization through evaluating the performance of branch office network to increase its efficiency and productivity to achieve sustainable business growth;
6. Developing quality and increasing the productivity of human resources and customer service to face business challenges; and
7. Increasing Company value for Shareholders and stakeholders.

Informasi Material Setelah Tanggal Laporan Akuntan

Tidak terdapat informasi material yang terjadi antara akhir periode pelaporan 31 Desember 2023 hingga tanggal laporan akuntan.

Material Information Subsequent to the Accountant's Reporting Date

There was no material information that occurred between the end of the reporting period of 31 December 2023 up to the date of the accountant's report.

Kebijakan Dividen

Kebijakan Dividen

Anggaran Dasar Bank Victoria mengatur bahwa besaran dividen disesuaikan dengan kemampuan Bank dan didasarkan pada keputusan RUPS. Hal tersebut dilakukan dengan mempertimbangkan kondisi keuangan dan tingkat kesehatan Bank, serta seluruh peraturan yang relevan di bidang perbankan.

Pembagian Dividen

Pada tahun 2023 dan 2022, Bank tidak membagikan dividen.

Dividend Policy

Dividend Policy

Bank Victoria's Articles of Association stipulate that the dividend amount is adjusted to the Bank's ability and is based on the GMS resolutions. Such matter is done by considering the Bank's financial condition and sound level, as well as all relevant regulations in banking sector.

Dividend Distribution

In 2023 and 2022, the Bank did not distribute any dividends.

Realisasi Penggunaan Dana Hasil Penawaran Umum

Bank Victoria telah melaporkan penggunaan dana hasil penawaran umum sesuai dengan Peraturan Otoritas Jasa Keuangan No. 30/POJK.04/2015 tanggal 16 Desember 2015 tentang Laporan Realisasi Penggunaan Dana Hasil Penawaran Umum. Informasi terkait realisasi pelaksanaan penawaran umum sepanjang tahun 2023 diungkapkan sebagai berikut:

Realization of the Use of Public Offering Proceeds

Bank Victoria has reported the use of public offering proceeds in accordance with the Financial Services Authority Regulation No. 30/POJK.04/2015 dated 16 December 2015, on Report of Actual Use of Proceeds from the Public Offering. Information regarding the realization of the public offering throughout 2023 was disclosed as follows:

(dalam Rupiah penuh / in full Rupiah)

Jenis Penawaran Umum Type of Public Offering	Tanggal Efektif Effective Date	Nilai Realisasi Hasil Penawaran Umum Realized Value of Public Offering Proceeds			Rencana Penggunaan Dana Plan to Use Proceeds		Realisasi Penggunaan Dana Realized Use of Proceeds		Sisa Dana Hasil Penawaran Umum Remaining Amount of Public Offering Proceeds
		Jumlah Hasil Penawaran Umum mount of Public Offering Proceeds	Biaya Penawaran Umum Public Offering Fee	Hasil Bersih Net Proceeds	Modal Kerjta dalam Rangka Pengembangan Usaha Working Capital in Business Development	Total	Modal Kerja dalam Rangka Pengembangan Usaha Working Capital in Business Development	Total	
Penawaran Umum Berkelanjutan Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri A Public Offering of Bank Victoria Continuing Bonds III Phase I 2023 Series A	28 Februari 2023 28 February 2023	300,000,000,000	8,617,218,052	491,382,781,948	491,382,781,948	491,382,781,948	491,382,781,948	491,382,781,948	-
Penawaran Umum Berkelanjutan Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri B Public Offering of Bank Victoria Continuing Bonds III Phase I 2023 Series B	28 Februari 2023 28 February 2023	200,000,000,000							
Pelaksanaan Waran Seri VII Execution of Series VII Warrants	5 Desember 2022 5 December 2022	106,400	-	106,400	106,400	106,400	106,400	106,400	-
Total		**500,000,106,400**	**8,617,218,052**	**491,382,888,348**	**491,382,888,348**	**491,382,888,348**	**491,382,888,348**	**491,382,888,348**	-

Informasi Material Investasi, Ekspansi, Divestasi, Penggabungan/Peleburan Usaha, Akuisisi, dan Restrukturisasi Utang/Modal

Investasi

Bank Victoria melakukan investasi dalam efek-efek pada tahun 2023 dengan uraian sebagai berikut:

Material Information on Investment, Expansion, Divestment, Business Merger/Consolidation, Acquisition, and Debt/Capital Restructuring

Investment

Bank Victoria invested in marketable securities in 2023 with the following description:

(dalam juta Rupiah / in million Rupiah)

Uraian	2023	2022	Description
Nilai Wajar melalui Laba Rugi / Fair Value through Profit or Loss			
Reksadana	790,570	400,037	Mutual Funds
Wesel Jangka Menengah	221,960	172,625	Medium-Term Notes
Subtotal	1,012,530	**572,662**	**Subtotal**
Nilai Wajar melalui Penghasilan Komprehensif Lain / Fair Value through Other Comprehensive Income			
Surat Utang Negara	757,213	1,095,239	Government Promissory Notes
Surat Berharga Syariah Negara	308,245	387,127	Government Sharia Bonds
Reksadana	306,932	-	Mutual Funds
Surat Berharga Syariah Korporasi	20,283	-	Corporate Sharia Bonds
Obligasi Korporasi	12,082	83,372	Corporate Bonds
Efek Beragun Aset	8,508	-	Asset-Backed Security
Wesel Jangka Menengah	-	20,548	Medium-Term Notes
Subtotal	1,413,264	**1,586,286**	**Subtotal**
Biaya Perolehan Diamortisasi / Amortised Cost			
Surat Utang Negara	3,547,973	2,476,659	Government Promissory Notes
Obligasi Korporasi	213,395	12,500	Corporate Bonds
Reksadana	73,000	-	Mutual Funds
Wesel Jangka Menengah	15,000	15,000	Medium-Term Notes
Sekuritas Rupiah Bank Indonesia (SRBI)	9,389	-	Bank Indonesia Rupiah Securities (SRBI)
Surat Berharga Syariah Negara	1,013	155,446	Government Sharia Bonds
Subtotal	3,859,770	**2,659,605**	**Subtotal**
Total	6,285,564	**4,818,553**	**Total**
Dikurangi			**Less**
Cadangan Kerugian Penurunan Nilai	(8,272)	(8,863)	Allowance for Impairment Losses
Total	6,277,292	**4,809,690**	**Total**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Restrukturisasi Utang dan/atau Restrukturisasi Modal

Pada tahun 2023, Bank Victoria melakukan transaksi restrukturisasi utang dan/atau restrukturisasi modal yang diuraikan sebagai berikut:

Debt Restructuring and/or Capital Restructuring

In 2023, Bank Victoria conducted debt restructuring and/or capital restructuring transactions as described below:

(dalam juta Rupiah / in million Rupiah)

Uraian	2023	2022*	Description
Penjadwalan Kembali Angsuran dan Perpanjangan Jangka Waktu Pinjaman	2,868,304	3,102,182	Rescheduling of Installments and the Extention of Credit Period
Perpanjangan Jangka Waktu, Penurunan Suku Bunga Pinjaman, Penggabungan Fasilitas Penambahan Plafon	-	1,378,111	Extention of Credit Period, Reduction of Interest Rate, Combined Facility, Additions of Plafond
Total Pinjaman yang Direstrukturisasi	2,868,304	4,480,293	Total Restructured Loans
Dikurangi: Cadangan Kerugian Penurunan Nilai	(447,527)	(428,127)	Less: Allowance for Impairment Losses
Total	2,420,777	**4,052,165**	**Total**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Divestasi

Di bulan Desember 2022, Bank telah melakukan divestasi atas 80% kepemilikan di Entitas Anak, PT Bank Victoria Syariah atau sebanyak 288.000.000 lembar saham kepada PT Victoria Investama Tbk (Pemegang Saham Utama) dengan harga jual sebesar nilai nominal saham dari Entitas Anak tersebut yaitu sebesar Rp288,00 miliar.

Nilai tercatat investasi pada Entitas Anak adalah sebesar Rp288,97 miliar dan rugi dari divestasi sebesar Rp968,38 juta dicatat di akun tambahan modal disetor. Transaksi divestasi ini merupakan transaksi kombinasi bisnis entitas sepengendali, oleh karena itu dicatat sesuai dengan PSAK 38 "Kombinasi Bisnis Entitas Sepengendali". Setelah divestasi, kepemilikan Bank di PT Bank Victoria Syariah adalah 19,81% dan Bank memiliki pengaruh signifikan, oleh karena itu investasi di PT Bank Victoria Syariah dicatat dengan metode ekuitas.

Pada tanggal 22 Desember 2022, Bank telah mendapatkan persetujuan dari Otoritas Jasa Keuangan atas divestasi tersebut melalui surat No. S-301/PB.101/2022 tertanggal 22 Desember 2022. Sejak tanggal 23 Desember 2022, PT Bank Victoria Syariah tidak lagi dikonsolidasikan ke dalam Laporan Keuangan Bank.

Ekspansi, Penggabungan/Peleburan Usaha, dan Akuisisi

Bank Victoria tidak melakukan kegiatan ekspansi, penggabungan/peleburan usaha, dan akuisisi di sepanjang tahun 2023.

Informasi Transaksi Material yang Mengandung Benturan Kepentingan

Bank Victoria tidak melakukan transaksi yang bersifat material yang mengandung unsur benturan kepentingan di sepanjang tahun 2023.

Divestment

In December 2022, the Bank divested 80% ownership in Subsidiary, PT Bank Victoria Syariah or equivalent to 288,000,000 shares to PT Victoria Investama Tbk (Majority Shareholder) with selling price equivalent to the nominal value of investment in the Subsidiary of Rp288.00 billion.

The carrying amount of investment in Subsidiary of Rp288.97 billion and loss from divestment of Rp968.38 million were recorded in the additional paid-in capital account. This divestment was business combination transaction of entities under common control, therefore it was recorded in accordance with PSAK 38 "Business Combination under Common Control Entities". After divestment, the Bank's ownership in PT Bank Victoria Syariah is 19.81% and the Bank has significant influence, therefore investment in PT Bank Victoria Syariah is recognized using equity method.

On 22 December 2022, the Bank received approval from the Financial Services Authority for the divestment through letter No. S-301/PB.101/2022 dated 22 December 2022. Since 23 December 2022, PT Bank Victoria Syariah is no longer consolidated into the Bank's Financial Statements.

Expansion, Business Merger/Consolidation, and Acquisition

Bank Victoria did not carry out any expansion, business merger/consolidations, and acquisition activities throughout 2023.

Information on Material Transactions with Conflict of Interest

Bank Victoria did not carry out any material transactions containing conflicts of interest throughout 2023.

Informasi Transaksi dengan Pihak Afiliasi

Pada tahun 2023, Bank Victoria melakukan transaksi afiliasi yang merupakan kegiatan usaha yang dijalankan dalam rangka menghasilkan pendapatan usaha dan dijalankan secara rutin, berulang, dan/atau berkelanjutan yang diuraikan sebagai berikut:

Information of Transaction with Affiliated Parties

In 2023, Bank Victoria made affiliate transactions, which were business activities carried out to generate business income and carried out routinely, repeatedly, and/or continuously as described as follows:

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Name of Parties	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transaction	Nilai Transaksi Transaction Value (Rp)
2 Februari 2023 2 February 2023	• Bank Victoria; dan • PT Victoria Insurance Tbk. • Bank Victoria; and • PT Victoria Insurance Tbk.	• PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 43,41%. • PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and • PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 43.41%.	Perlindungan *cash insurance, Bank Notes,* dan *Curency Notes* yang berada dalam brankas/*chasier box* untuk periode 2 Februari 2023-2 Februari 2024. Cash insurance protection, Bank Notes and Currency Notes which are in a safe/ chasier box for the period of 2 February 2023-2 February 2024.	Memberikan proteksi *all risk* untuk *cash insurance, Bank Notes,* dan *Curency* Notes atas 38 lokasi kantor Bank Victoria. Providing all risk protection for cash insurance, Bank Notes, and Currency Notes for 38 Bank Victoria office locations.	157,562,141
15 Februari 2023 15 February 2023	• Bank Victoria; dan • PT Victoria Insurance Tbk. • Bank Victoria; and • PT Victoria Insurance Tbk.	• PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 43,41%. • PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and • PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 43.41%.	Kantor milik Bank Victoria, yaitu KCP Surabaya Lt.4 yang terletak di Jl. Raya Darmo No. 173 Kel. Darmo, Kec. Wonokromo, Surabaya. Bank Victoria's office, KCP Surabaya 4th Floor, located on Jl. Raya Darmo No. 173 Kel. Darmo, Kec. Wonokromo, Surabaya.	Memaksimalkan fungsi ruangan yang ada untuk disewakan serta meningkatkan sinergi dan *cross selling* antara Bank Victoria dengan PT Victoria Insurance Tbk. Maximizing the function of existing space for rent and increasing synergy and cross selling between Bank Victoria and PT Victoria Insurance Tbk.	65,448,000
1 Maret 2023 1 March 2023	• Bank Victoria; dan • PT Victoria Insurance Tbk. • Bank Victoria; and • PT Victoria Insurance Tbk.	• PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 43,56%. • PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and • PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with	Perlindungan asuransi gedung (*building and inventory*). Building and inventory insurance coverage.	Memberikan perlindungan *property all risk* atas 32 lokasi kantor Bank Victoria. Providing property all risk protection for 32 Bank Victoria office locations.	102,328,537

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Name of Parties	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transaction	Nilai Transaksi Transaction Value (Rp)
10 Mei 2023 10 May 2023	• Bank Victoria; dan • PT Asri Kencana Gemilang. • Bank Victoria; and • PT Asri Kencana Gemilang.	• PT Asri Kencana Gemilang dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%; • PT Bhuwanatala Indah Permai Tbk dimilki sahamnya oleh Safire Capital Ltd sebesar 66,52%; • Safire Capital Ltd dimilki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100,00%; dan • Chemical Asia Corporation Pte Ltd dimilki sahamnya oleh Suzanna Tanojo sebesar 36,58% dan Louise Li sebesar 63,11%, di mana Louise Li merupakan anak dari Suzanna Tanojo. • PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Asri Kencana Gemilang; • Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk; • Chemical Asia Corporation Pte Ltd owns 100.00% shares of Safire Capital Ltd; and • Chemical Asia Corporation Pte Ltd is owned by Suzanna Tanojo with 36.58% shares and Louise Li with 63.11% shares, in which Louise Li is a son of Ms. Suzanna Tanojo.	Sewa ruang kantor di Gedung Graha BIP Lt. 3 Jl. Gatot Subroto Kav. 23, Jakarta Selatan. Lease of office space at Graha BIP Building 3rd Floor Jl. Gatot Subroto Kav. 23, South Jakarta.	Menyewa ruang kantor sebagai kantor pusat Bank Victoria. Renting office space as Bank Victoria's head office.	1,548,385,548

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Name of Parties	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transaction	Nilai Transaksi Transaction Value (Rp)
27 Juni 2023 27 June 2023	• Bank Victoria; dan • PT Tri Daya Investindo. • Bank Victoria; and • PT Tri Daya Investindo.	• PT Tri Daya Investindo dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%; • PT Bhuwanatala Indah Permai Tbk dimilki sahamnya oleh Safire Capital Ltd sebesar 66,52%; • Safire Capital Ltd dimilki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100,00%; dan • Chemical Asia Corporation Pte Ltd dimilki sahamnya oleh Louise Li sebesar 63,11% dan Louise Li merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali). • PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Tri Daya Investindo; • Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk; • Chemical Asia Corporation Pte Ltd owns 100.00% shares of Safire Capital Ltd; and • Louise Li owns 63.11% shares of Chemical Asia Corporation Pte Ltd, and Louise Li is a son of Suzanna Tanojo (Controlling Shareholder).	Aset tanah seluas 44.816 m^2 yang berlokasi di Perum Villa Cinere Mas, Jl. Mars Raya, Kel. Pisangan, Kec. Ciputat Timur, Tangerang Selatan. Land assets covering an area of 44,816 m^2 located at Perum Villa Cinere Mas, Jl. Mars Raya, Kel. Pisangan, Kec. East Ciputat, South Tangerang.	Menjual aset tanah seluas 44.816 m^2 yang berlokasi di Perum Villa Cinere Mas kepada PT Tri Daya Investindo. Selling land assets covering an area of 44,816 m^2 located at Perum Villa Cinere Mas to PT Tri Daya Investindo.	60,000,000,000
1 September 2023	• Bank Victoria; dan • PT Victoria Insurance Tbk. • Bank Victoria; and • PT Victoria Insurance Tbk.	• PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 44,24%. • PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and • PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 44.24%.	Perlindungan asuransi gedung (*building and inventory*). Building and inventory insurance coverage.	Memberikan perlindungan *property all risk* atas 37 lokasi kantor Bank Victoria. Providing property all risk protection for 37 Bank Victoria office locations.	136,275,430

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Name of Parties	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transaction	Nilai Transaksi Transaction Value (Rp)
1 September 2023	• Bank Victoria; dan • PT Victoria Insurance Tbk. • Bank Victoria; and • PT Victoria Insurance Tbk.	• PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 44,24%. • PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and • PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 44.24%.	Perlindungan *Cash Insurance, Bank Notes, Curency Notes, Cheque, Postal Order* atau *Money Changer* terhadap risiko perampokan selama dalam perjalanan saat pengangkutan/pengiriman. Protection for Cash Insurance, Bank Notes, Currency Notes, Cheques, Postal Orders, or Money Changer protection against the risk of robbery during ransportation/delivery.	Memberikan proteksi *all risk* dari kehilangan atau kerusakan fisik dari sebab apapun yang timbul seperti aslinya. Providing all risk protection from loss or physical damage from any causes arising as it was originally.	211,200,000
20 September 2023	• Bank Victoria; dan • PT Bank Victoria Syariah Tbk. • Bank Victoria; and • PT Bank Victoria Syariah Tbk.	• PT Bank Victoria Syariah Tbk dimiliki sahamnya oleh Bank Victoria sebesar 19,81%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 44,42% dan PT Bank Victoria Syariah Tbk sebesar 90,19%. • Bank Victoria owns 19.81% shares of PT Bank Victoria Syariah Tbk; and • PT Victoria Investama Tbk is the controlling shareholder of Bank Victoria which owns 44.42% shares and 90.19% shares of PT Bank Victoria Syariah Tbk.	Kantor milik Bank Victoria, yaitu ex-KCP Kalimalang yang terletak di Jl. KH Noerali No. 41 H, Kel. Bintara Jaya, Kec. Bekasi Barat, Bekasi. Bank Victoria's office, ex-KCP Kalimalang, located on Jl. KH Noerali No. 41 H, Kel. Bintara Jaya, Kec. West Bekasi, Bekasi.	Memaksimalkan fungsi ruangan yang ada untuk disewakan serta meningkatkan sinergi dan *cross selling* antara Bank Victoria dengan PT Bank Victoria Syariah Tbk. Maximizing the function of existing space for rent and increasing synergy and cross selling between Bank Victoria and PT Bank Victoria Syariah Tbk.	254,520,000

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Name of Parties	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transaction	Nilai Transaksi Transaction Value (Rp)
22 September 2023	• Bank Victoria; dan • PT Asri Kencana Gemilang. • Bank Victoria; and • PT Asri Kencana Gemilang.	• PT Asri Kencana Gemilang dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%; • PT Bhuwanatala Indah Permai Tbk dimilki sahamnya oleh Safire Capital Ltd sebesar 66,52%; • Safire Capital Ltd dimilki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100,00%; dan • Chemical Asia Corporation Pte Ltd dimilki sahamnya oleh Louise Li sebesar 63,11% dan Louise Li merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali). • PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Asri Kencana Gemilang; • Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk; • Chemical Asia Corporation Pte Ltd owns 100.00% shares of Safire Capital Ltd; and • Louise Li owns 63.11% shares of Chemical Asia Corporation Pte Ltd, and Louise Li is a son of Suzanna Tanojo (Controlling Shareholder).	Sewa ruang kantor di Gedung Graha BIP Lt. 9 Jl. Gatot Subroto Kav. 23, Jakarta Selatan. Lease of office space at Graha BIP Building 9th Floor Jl. Gatot Subroto Kav. 23, South Jakarta.	Menyewa ruang kantor sebagai kantor pusat Bank Victoria. Renting office space as Bank Victoria's head office.	183,186,000
13 Oktober 2023 13 October 2023	• Bank Victoria; dan • PT Emperor Finance Indonesia. • Bank Victoria; and • PT Emperor Finance Indonesia.	• PT Emperor Finance Indonesia dimiliki sahamnya oleh PT Dwimagna Kapital Indonesia sebesar 99,00%; dan • PT Dwimagna Kapital Indonesia dimilki sahamnya oleh Debora Wahjutirto Tanoyo sebesar 24,50% dan merupakan Direktur Bank Victoria. • PT Dwimagna Kapital Indonesia owns 99.00% shares of PT Emperor Finance Indonesia; and • Debora Wahjutirto Tanoyo owns 24.50% shares of PT Dwimagna Kapital Indonesia and is the Director of Bank Victoria.	Sewa ruang kantor di Komplek Ruko Bangkong Plaza Blok B-7, Jl. MT Haryono No. 864-866, Kel. Peterongan, Kec. Semarang Selatan, Semarang. Lease of office space at Bangkong Plaza Ruko Complex Blok B-7, Jl. MT Haryono No. 864-866, Kel. Peterongan, Kec. South Semarang, Semarang.	Menyewa ruang kantor sebagai Kantor Cabang Semarang. Renting office space as Semarang Branch Office.	444,000,000

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Name of Parties	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transaction	Nilai Transaksi Transaction Value (Rp)
1 Desember 2023 1 December 2023	• Bank Victoria; dan • PT Victoria Insurance Tbk. • Bank Victoria; and • PT Victoria Insurance Tbk.	• PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 72,95%; dan • PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 44,24%. • PT Victoria Investama Tbk owns 72.95% shares of PT Victoria Insurance Tbk; and • PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 44.24%.	Perlindungan atas 25 unit kendaraan asuransi kendaraan (mobil dan motor) untuk periode 1 Desember 2023 sampai 1 Desember 2024. Protection for 25 units of vehicle (cars and motorcycle) insurance for the period 1 of December 2023 to 1 December 2024.	Memberikan perlindungan asuransi *total loss only and comprehensive (all risk)* atas atas 25 unit kendaraan (mobil dan motor) milik Bank Victoria. Providing total loss only and comprehensive (all risk) insurance protection for 25 vehicles (cars and motorcycle) owned by Bank Victoria.	73,548,223
22 Desember 2023 22 December 2023	• Bank Victoria; dan • PT Asri Kencana Gemilang. • Bank Victoria; and • PT Asri Kencana Gemilang.	• PT Asri Kencana Gemilang dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%; • PT Bhuwanatala Indah Permai Tbk dimilki sahamnya oleh Safire Capital Ltd sebesar 66,52%; • Safire Capital Ltd dimilki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100,00%; dan • Chemical Asia Corporation Pte Ltd dimilki sahamnya oleh Louise Li sebesar 63,11% dan Louise Li merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali). • PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Asri Kencana Gemilang; • Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk; • Chemical Asia Corporation Pte Ltd owns 100.00% shares of Safire Capital Ltd; and • Louise Li owns 63.11% shares of Chemical Asia Corporation Pte Ltd, and Louise Li is a son of Suzanna Tanojo (Controlling Shareholder).	Sewa ruang kantor di Gedung Graha BIP Lt. 3 Jl. Gatot Subroto Kav. 23, Jakarta Selatan. Lease of office space at Graha BIP Building 3rd Floor Jl. Gatot Subroto Kav. 23, South Jakarta.	Menyewa ruang kantor sebagai kantor pusat Bank Victoria. Renting office space as Bank Victoria's head office.	2,615,382,000

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Name of Parties	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transaction	Nilai Transaksi Transaction Value (Rp)
22 Desember 2023 22 December 2023	• Bank Victoria; dan • PT Asri Kencana Gemilang. • Bank Victoria; and • PT Asri Kencana Gemilang.	• PT Asri Kencana Gemilang dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%; • PT Bhuwanatala Indah Permai Tbk dimiliki sahamnya oleh Safire Capital Ltd sebesar 66,52%; • Safire Capital Ltd dimiliki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100,00%; dan • Chemical Asia Corporation Pte Ltd dimiliki sahamnya oleh Louise Li sebesar 63,11% dan Louise Li merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali). • PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Asri Kencana Gemilang; • Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk; • Chemical Asia Corporation Pte Ltd owns 100.00% shares of Safire Capital Ltd; and • Louise Li owns 63.11% shares of Chemical Asia Corporation Pte Ltd, and Louise Li is a son of Suzanna Tanojo (Controlling Shareholder).	Sewa ruang kantor di Gedung Graha BIP Lt. 9 Jl. Gatot Subroto Kav. 23, Jakarta Selatan. Lease of office space at Graha BIP Building 9th Floor Jl. Gatot Subroto Kav. 23, South Jakarta.	Menyewa ruang kantor sebagai kantor pusat Bank Victoria. Renting office space as Bank Victoria's head office.	781,218,000

Transaksi dengan Afiliasi dan Kewajaran Transaksi

Seluruh transaksi dengan pihak afiliasi pada tahun 2023 dilakukan secara wajar (*Arm's Length*) dan sesuai dengan peraturan perundang-undangan. Transaksi dilakukan atas dasar alasan kebutuhan Bank dan bebas dari konflik kepentingan.

Pemenuhan Peraturan dan Ketentuan Terkait

Bank telah memenuhi peraturan dan ketentuan terkait, yaitu Peraturan Otoritas Jasa Keuangan No. 42/POJK/04/2020 tanggal 1 Juli 2020 tentang Transaksi Afiliasi dan Transaksi Benturan Kepentingan.

Transactions with Affiliates and Fairness of Transactions

All transactions with affiliated parties in 2023 were done in Arm's Length and in accordance with laws and regulations. The transactions are conducted based on the Bank's needs and free of any conflict of interest.

Fulfillment of Related Regulations and Provisions

The Bank has complied with related laws and regulation, that is Financial Services Authority Regulation No. 42/POJK/04/2020 dated 1 July 2020, on Transactions with Affiliation and Transactions with Conflict of Interest.

Pernyataan Dewan Komisaris, Direksi, dan Komite Audit

Direksi menyatakan bahwa transaksi dengan pihak afiliasi ini telah melalui prosedur yang memadai untuk memastikan bahwa transaksi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum antara lain dilakukan dengan memenuhi prinsip transaksi yang wajar (*arms length principle*). Selain itu, peran Dewan Komisaris dan Komite Audit dalam melakukan prosedur yang memadai untuk memastikan bahwa transaksi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum antara lain dilakukan dengan memenuhi prinsip transaksi yang wajar (*arms length principle*).

Statement of Board of Commissioners, Board of Directors, and Audit Committee

The Board of Directors states that transactions with affiliated parties were done with adequate procedures to ensure that the transactions were done in accordance with generally accepted business practices, among others, by complying with the arms-length principle. In addition, the role of the Board of Commissioners and the Audit Committee in performing adequate procedures to ensure that transactions were carried out in accordance with generally accepted business practices, among others, by complying with the arms-length principle.

Transaksi dengan Pihak Berelasi

Dalam kegiatan normal usaha, Bank Victoria melakukan transaksi dengan pihak berelasi karena hubungan kepemilikan dan/atau kepengurusan. Seluruh transaksi dengan pihak-pihak berelasi telah dilakukan dengan persyaratan dan kondisi yang sama seperti yang diberlakukan kepada pihak ketiga.

Transaction with Related Parties

In routine business activities, Bank Victoria makes transactions with related parties due to relationships in ownership and/or management. All transactions with related parties are made under the same terms and conditions as those applied to third parties.

Nama dan Sifat Hubungan Berelasi

Informasi terkait nama dan sifat hubungan pihak-pihak berelasi yang melakukan transaksi dengan Bank Victoria disajikan dalam tabel berikut:

Name and Nature of Relationships

Information regarding the names and nature of relationships of related parties conducting transactions with Bank Victoria is presented in the following table:

Pihak-Pihak Berelasi Related Parties	Sifat dari Hubungan Nature of Relationship	Jenis Transaksi Type of Transaction
PT Victoria Investama Tbk	**Pemegang Saham** Shareholder	Simpanan Nasabah, Pinjaman yang Diberikan Deposits from Customers, Loans
PT Bank Victoria Syariah	**Dimiliki oleh Pemegang Saham Utama** Under Common Control	Simpanan dari Bank Lain Deposits from Other Banks
PT Victoria Sekuritas Indonesia, PT Grha Swahita, PT Merak Energi Indonesia, dan PT Tridaya Investindo (dahulu PT BIP Tridaya Propertindo). PT Victoria Sekuritas Indonesia, PT Grha Swahita, PT Merak Energi Indonesia, and PT Tridaya Investindo (formerly PT BIP Tridaya Propertindo).	**Dimiliki oleh Pemegang Saham Utama** Under Common Control	Simpanan Nasabah, Pinjaman yang Diberikan Deposits from Customers, Loans
PT Jaya Bhakti Mandiri dan PT Cahaya Medika Health Care PT Jaya Bhakti Mandiri and PT Cahaya Medika Health Care	**Dimiliki oleh Pemegang Saham Utama** Under Common Control	Pinjaman yang Diberikan Loans
PT Victoria Insurance Indonesia	**Dimiliki oleh Pemegang Saham Utama** Under Common Control	Simpanan Nasabah, Pinjaman yang Diberikan, Asuransi Aset Tetap dan Asuransi Kas Deposits from Customers, Loans, Fixed Assets Insurance and Cash Insurance

Pihak-Pihak Berelasi Related Parties	Sifat dari Hubungan Nature of Relationship	Jenis Transaksi Type of Transaction
PT Padi Unggul Indonesia, PT Victoria Alife Indonesia, PT Victoria Manajemen Investasi, PT BIP Loka Kencana, PT BIP Sentosa, PT Studio One PT Asri Kencana Gemilang, PT Artoda Karya Gemilang, PT Bhuwanatala Indah Permai, PT Frogurt Sari Indonesia, PT Emperor Finance Indonesia, PT Grata Mulia Pratama, PT Putra Asih Laksana, PT Suryayudha Investindo Cipta, PT GMT Investama Mandiri Tbk, PT Dwimagna Kapital Indonesia, PT Magna Investa Mandiri, PT Bintang Jaya Bara Sentosa, PT BIP Boga Entertainment, PT BIP Boga Permai, PT Bumi Semesta Lestari, PT Prolestari Mega Persada, PT Regis Pratama Indonesia, PT Surya Cakra Multi Sarana, dan PT Verena Kapital PT Padi Unggul Indonesia, PT Victoria Alife Indonesia, PT Victoria Manajemen Investasi, PT BIP Loka Kencana, PT BIP Sentosa, PT Studio One PT Asri Kencana Gemilang, PT Artoda Karya Gemilang, PT Bhuwanatala Indah Permai, PT Frogurt Sari Indonesia, PT Emperor Finance Indonesia, PT Grata Mulia Pratama, PT Putra Asih Laksana, PT Suryayudha Investindo Cipta, PT GMT Investama Mandiri Tbk, PT Dwimagna Kapital Indonesia, PT Magna Investa Mandiri, PT Bintang Jaya Bara Sentosa, PT BIP Boga Entertainment, PT BIP Boga Permai, PT Bumi Semesta Lestari, PT Prolestari Mega Persada, PT Regis Pratama Indonesia, PT Surya Cakra Multi Sarana, and PT Verena Kapital	**Dimiliki oleh Pemegang Saham Utama** Under Common Control	Simpanan nasabah Deposits from customers
PT Sulfindo Adiusaha	**Dimiliki oleh Pemegang Saham Utama** Under Common Control	Simpanan Nasabah, Bank Garansi Deposits from customers, Bank Guarantee
PT Nata Patindo dan Christine Tanojo	**Pemegang Saham** Shareholder	Simpanan Nasabah Deposits from customers
Suzanna Tanojo	**Pemegang Saham Pengendali** Controlling Shareholder	Simpanan Nasabah Deposits from customers
Luciana Tanoyo	**Hubungan Keluarga dengan Suzanna Tanojo** Relative of Suzanna Tanojo	Simpanan Nasabah Deposits from customers
Dewan Komisaris, Direksi, dan Pejabat Eksekutif Bank Board of Commissioners, Board of Directors, and Executive Officers of the Bank	**Manajemen dan Karyawan Kunci** Key Management and Employees	Simpanan Nasabah, Pinjaman yang Diberikan Deposits from Customers, Loans
Dewan Komisaris, Direksi, Eksekutif Entitas Asosiasi Board of Commissioners, Board of Directors, Executive Officers of Associated Entity	**Manajemen dan Karyawan Kunci** Key Management and Employees	Simpanan Nasabah, Pinjaman yang Diberikan Deposits from Customers, Loans

Informasi terkait rincian saldo transaksi dengan pihak-pihak berelasi telah diungkapkan dan dapat dilihat pada Catatan atas Laporan Keuangan No. 39 tentang Informasi Mengenai Pihak-Pihak Berelasi.

Information regarding details of transaction balances with related parties is disclosed and can be seen in Notes to Financial Statements No. 39 on Information of Related Parties.

Kewajaran dan Alasan Dilakukan Transaksi

Transaksi dengan pihak berelasi telah dilakukan secara wajar sesuai dengan kepentingan Bank (*arm's length transaction*). Seluruh transaksi dengan pihak berelasi dilaksanakan atas dasar alasan kebutuhan usaha Bank Victoria serta ditujukan untuk meningkatkan kinerja Bank.

Fairness in and Reasons for Conducting Transactions

Transactions with related parties have been conducted fairly in accordance with the Bank's Interests (Arm's Length Transaction). All transactions with related parties are carried out on the grounds of the business needs of Bank Victoria and are aimed at improving the Bank's performance.

Kebijakan Mekanisme *Review* atas Transaksi dan Pemenuhan Peraturan Terkait

Mengacu pada Peraturan Bank Indonesia No. 7/3/PBI/2005 tentang Batas Maksimum Pemberian Kredit Industri Perbankan, yang telah diubah dengan Peraturan Bank Indonesia No. 8/13/PBI/2006 tentang Perubahan atas Peraturan Bank Indonesia No. 7/3/PBI/2005 tentang Batas Maksimum Pemberian Kredit Industri Perbankan, Bank wajib menerapkan prinsip kehati-hatian dan manajemen risiko dalam memberikan Penyediaan Dana, khususnya Penyediaan Dana Kepada Pihak Terkait dan atau Penyediaan Dana Besar, dan Surat Keputusan Direksi No. 017/SK-DIR/06/13 tanggal 18 Juni 2013 tentang Unit Kerja Pengkonsolidasi Batas Maksimum Pemberian Kredit (BMPK) menunjuk Divisi Kepatuhan sebagai Unit Kerja yang bertugas mengelola informasi eksposur BMPK terkait.

Review Mechanism Policy on Transactions and Compliance with Related Regulations

Referring to Bank Indonesia Regulation No. 7/3/PBI/2005 on Legal Lending Limit for Banking Industry, as amended by Bank Indonesia Regulation No. 8/13/PBI/2006 on Amendment to Bank Indonesia Regulation No. 7/3/PBI/2005 on Legal Lending Limit for Banking Industry, the Bank must apply prudential principles and risk management in Financing, particularly Financing to Related Parties and/or Large Exposures, and the Board of Directors' Decision Letter No. 017/SK-DIR/06/13 dated 18 June 2013 on Legal Lending Limit (LLL) Consolidation Work Unit, the Compliance Division is appointed as the Work Unit in charge of processing information on related LLL exposure.

Komitmen dan Kontinjensi

Komitmen dan kontinjensi Bank selama 2 (dua) tahun buku terakhir dinyatakan dalam nilai kontrak sebagai berikut:

Commitments and Contingencies

The Bank's commitments and contingencies for the past 2 (two) fiscal years are stated in contract value as follows:

(dalam jutaan Rupiah / in million Rupiah)

Uraian	2023	2022	Description
Komitmen / Commitments			
Liabilitas Komitmen			**Commitment Liabilities**
Fasilitas Pinjaman yang Belum Digunakan			Unused Loans Facilities
Pihak Ketiga	**(5,280,610)**	(4,016,398)	Third Parties
Pihak Berelasi	**(17,037)**	(17,296)	Related Parties
Liabilitas Komitmen - Bersih	**(5,297,647)**	**(4,033,694)**	**Commitment Liabilities - Net**
Rasio Kepatuhan / Contingencies			
Tagihan Kontinjensi			**Contingent Receivables**
Pendapatan Bunga atas Pinjaman Bermasalah - Pihak Ketiga	**311,524**	364,248	Interest Receivables on Non-Performing Loans - Third Parties
Liabilitas Kontinjensi			**Contingent Liabilities**
Garansi yang Diterbitkan – Pihak Berelasi	**(271)**	(2,498)	Guarantees Issued – Related Parties
Garansi yang Diterbitkan – Pihak Ketiga	**(982,532)**	(345,130)	Guarantees Issued – Third Parties
Letter of Credit	**(60,564)**	(18,706)	Letter of Credit
Kontinjensi - Bersih	**(731,843)**	**(2,085)**	**Contingent - Net**
Total Liabilitas Komitmen dan Kontinjensi – Bersih	**(6,029,490)**	**(4,035,779)**	**Total Commitment and Contingencies Liabilities – Net**

Larangan, Batasan, dan/atau Hambatan Signifikan untuk Melakukan Transfer Dana antara Bank dan Entitas Lain dalam Satu Kelompok Usaha

Bank Victoria tidak memiliki larangan/batasan dalam prosedur operasional terkait transfer dana nasabah, baik dalam bentuk transfer masuk maupun transfer keluar antara Bank dan entitas lain dalam 1 (satu) kelompok usaha. Dalam menyalurkan pinjaman ke pihak ketiga dan entitas lainnya dalam 1 (satu) kelompok usaha, Bank Victoria mengacu pada BMPK yang telah dibuat oleh Divisi *Accounting* dan dipantau oleh Divisi *Compliance & System Procedure* dan Divisi *Credit Risk Review*.

Prohibitions, Restrictions, and/or Significant Barriers to Transfer Funds between the Bank and Other Entities in One Business Group

Bank Victoria has no restrictions/limitations in operational procedures regarding Customer's fund transfer either incoming and outgoing transfers between the Bank and other entities within 1 (one) business group. In providing loans to third parties and other entities within 1 (one) business group, Bank Victoria refers to LLL formulated by the Accounting Division, and the activity is monitored by the Compliance & System Procedure Division and Credit Risk Review Division.

Perubahan Peraturan Perundang-Undangan yang Berpengaruh Signifikan terhadap Kinerja Bank

Sepanjang tahun 2023, terdapat perubahan peraturan perundang-undangan yang berpengaruh signifikan terhadap kinerja Bank yang diuraikan sebagai berikut:

Amendments to Laws and Regulations with Significant Impacts on the Bank's Performance

Throughout 2023, there were amendments to laws and regulations that significantly affected the Bank's performance, as outlined below:

Peraturan Regulation	Dampak terhadap Laporan Keuangan Impact on Financial Statements	Penyesuaian yang Dilakukan Adjustment Made
Peraturan Otoritas Jasa Keuangan No. 08 Tahun 2023 Financial Services Authority Regulation No. 08 of 2023	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Surat Keputusan Direksi No. 007A/SK-DIR/12/23 tentang Kebijakan *Anti Money Laundering, Counter Terrorist Financing & Weapon Mass Destruction* (AML, CTF, & WMD) Board of Directors' Decision Letter No. 007A/SK-DIR/12/23 on Policies on Anti-Money Laundering, Counter-Terrorist Financing & Weapon Mass Destruction (AML, CFT, & WMD)
Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 Financial Services Authority Regulation No. 17 of 2023	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum Dissemination of Financial Services Authority Regulation No. 17 of 2023 on Implementation of Governance for Commercial Banks

Perubahan Kebijakan Akuntansi

Alasan Perubahan Kebijakan Akuntansi

Bank menerapkan perubahan kebijakan akuntansi baru di tahun 2023 adalah untuk mematuhi Pernyataan Standar Akuntansi Keuangan (PSAK) yang berlaku.

Amendments to Accounting Policies

Reasons of Amendments to Accounting Policies

The Bank implemented a new accounting policy amendment in 2023 to comply with the applicable Statement of Financial Accounting Standards (PSAK).

Perubahan Kebijakan Akuntansi yang Signifikan

Standar akuntansi keuangan, perubahan, dan interpretasi standar akuntansi keuangan yang berlaku efektif sejak 1 Januari 2023 sebagai berikut:

1. Amandemen PSAK 1: Penyajian Laporan Keuangan - Pengungkapan Kebijakan Akuntansi;
2. Amandemen PSAK 25: Kebijakan Akuntansi, Perubahan Estimasi Akuntansi, dan Kesalahan terkait Definisi Estimasi Akuntansi; dan
3. Amandemen PSAK 46: Pajak Penghasilan Pajak Tangguhan Terkait Aset dan Liabilitas yang Timbul dari Transaksi Tunggal.

Dampak Perubahan Kebijakan Akuntansi terhadap Laporan Keuangan Bank

Implementasi dari standar-standar tersebut tidak menghasilkan perubahan substansial terhadap kebijakan akuntansi Bank dan tidak memiliki dampak yang material terhadap laporan keuangan di tahun berjalan atau tahun sebelumnya.

Significant Amendments to Accounting Policies

Financial accounting standards, amendments, and interpretations of financial accounting standards effective as of 1 January 2023 are as follows:

1. Amendment to PSAK 1: Presentation of Financial Statements - Disclosure of Accounting Policies;
2. Amendment to PSAK 25: Accounting Policies, Changes in Accounting Estimates, and Errors regarding Definition of Accounting Estimates; and
3. Amendment to PSAK 46: Income Taxes regarding Deferred Tax related to Assets and Liabilities arising from a Single Transaction.

Impact of Amendments to Accounting Policies on Bank Financial Statements

The implementation of the above standards did not result in substantial changes to the Bank's accounting policies and had no material impact to the Financial Statements for current year or prior financial years.

ASPEK PENDUKUNG BISNIS

Aspect of Business Support




Lorem Ipsum

Teknologi Informasi
Information Technology

Pandemi Covid-19 mendorong perubahan perilaku masyarakat dalam bertransaksi secara digital yang menuntut Bank untuk mengembangkan perbankan digital secara berkesinambungan. Bank senantiasa menambahkan fitur baru guna meningkatkan kemudahan dan kenyamanan bertransaksi, mempertahankan keandalan dan keamanan transaksi, serta mengembangkan ekosistem perbankan digital dan elektronik dengan berfokus pada pengembangan *mobile banking* dan *internet banking*. Komitmen ini menempatkan Bank pada posisi yang siap dalam menghadapi evolusi digital di industri perbankan.

The Covid-19 pandemic has changed people's behavior in using digital transactions, which requires the Bank to continuously develop digital banking. The Bank constantly adds new features to increase transactions' convenience and comfort, maintain transactions' reliability and security, and develop digital and electronic banking ecosystem by focusing on the development of mobile banking and internet banking. This commitment places the Bank to be ready to face digital evolution in the banking industry.

Roadmap Teknologi Informasi

Bank telah merancang *roadmap* pengembangan Teknologi Informasi (TI) yang diselaraskan dengan rencana jangka menengah dan jangka panjang. Beberapa langkah kunci yang diambil oleh Bank meliputi:

1. Melakukan pengembangan berkelanjutan dalam *revamping internet banking* dan *mobile banking* dengan menyediakan fitur dan produk digital yang unggul dan bersaing serta dilengkapi dengan pembukaan rekening digital (*digital on boarding*) menggunakan teknologi *biometric*. Pembukaan rekening digital tersebut bertujuan untuk menarik minat nasabah baru serta nasabah yang sudah ada agar lebih tertarik untuk menempatkan dana dan bertransaksi melalui Bank Victoria;
2. Melakukan pengembangan berkelanjutan dalam revamping *internet banking business* dengan fitur-fitur finansial dan non-finansial serta dilengkapi dengan fitur *cash management*, antara lain *virtual account* dan *payroll* untuk kebutuhan transaksi keuangan dari perusahaan;
3. Meningkatkan kualitas layanan kepada nasabah dengan melakukan pengembangan *digital operations*, yaitu melakukan aktivitas transaksi non-tunai dengan menggunakan teknologi *video banking*, sehingga interaksi terhadap transaksi dapat dilakukan secara virtual namun tetap mengedepankan prinsip kehati-hatian serta keamanan transaksi;
4. Melakukan kerja sama dengan pihak ketiga seperti kementerian, bank, lembaga keuangan non-bank, *e-commerce, online travel agent, peer to peer lending* dengan skema *platform business (omni channel)* untuk meningkatkan jumlah nasabah dan frekuensi transaksi; dan
5. Memperkenalkan ekosistem *digital lending* untuk memberikan sumber nasabah kredit kepada Bank dan kecepatan proses kredit Bank kepada nasabah kredit.

Dengan implementasi *roadmap* TI, Bank Victoria berharap dapat terus meningkatkan kinerja operasional, mengoptimalkan penggunaan TI, dan tetap relevan dalam pasar yang terus berubah.

Information Technology Roadmap

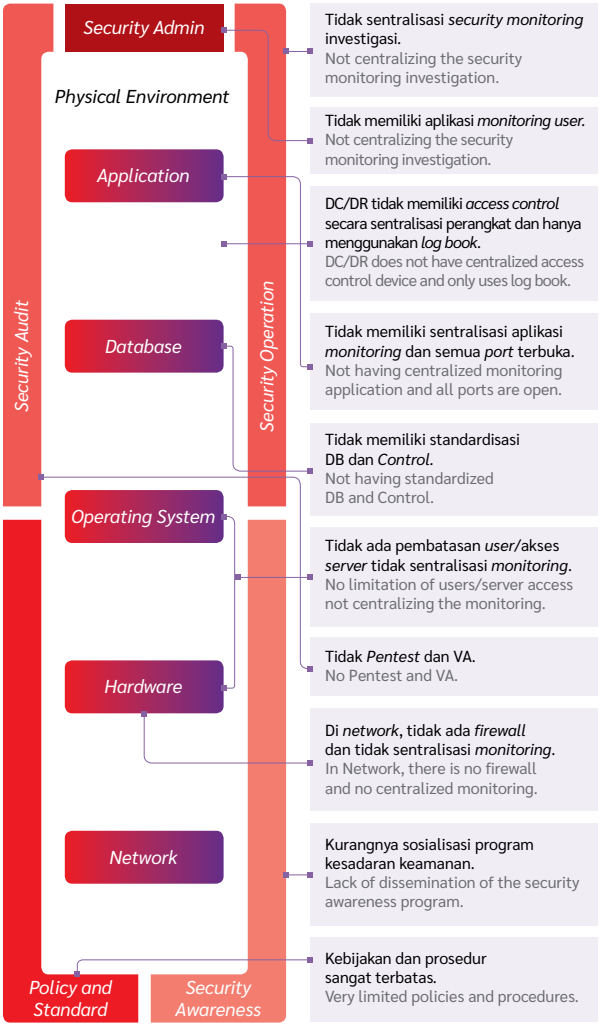
The Bank has designed an Information Technology (IT) development roadmap, aligned with medium-term and long-term plans. Some of the key steps taken by the Bank include:

1. Carrying out continuous development in revamping internet banking and mobile banking by providing excellent and competitive digital features and products, equipped with digital account openings (digital on boarding) by using biometric technology. The digital account opening is aimed to attract new customers and existing customers to be more interested in placing funds and making transactions through Bank Victoria;
2. Carrying out continuous development in revamping internet banking business with financial and non-financial features, equipped with cash management features, including virtual accounts and payroll for company's financial transaction needs;
3. Improving services quality to customers by developing digital operations, which is by conducting non-cash transaction activities using video banking technology, so as interaction with transactions can be carried out virtually but still prioritizing the principle of prudence and security in transactions;
4. Cooperating with third parties, such as ministries, banks, non-bank financial institutions, e-commerce, online travel agents, and peer to peer lending with a business platform (omni channel) scheme, to increase the number of customers and transaction frequency; and
5. Introducing a digital lending ecosystem to provide the source of credit customers to the Bank and the speed of the Bank's loan process to credit customers.

By implementing IT roadmap, Bank Victoria expects to continue improving operational performance, optimizing IT use, and staying relevant in the ever-changing market.

Skema Rencana Strategis Keamanan Teknologi Informasi

Previous Security Management

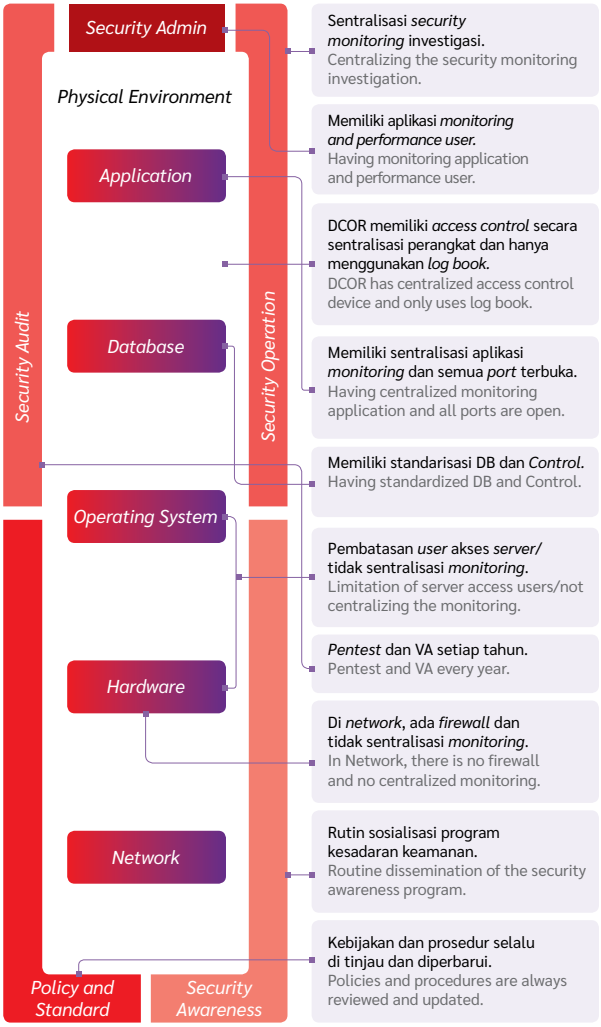


- Investasi terbatas untuk infrastruktur keamanan.
- IT *Security* hanya fokus pada perbaikan infrastruktur.
- Kurangnya program kesadaran keamanan.
- Minimnya keterlibatan *IT Section* dalam proses pengembangan aplikasi baru.

- Limited investment in security infrastructure.
- IT Security only focuses on improving infrastructure.
- Lack of security awareness program.
- Lack of IT Section involvement in the process of developing new applications.

Chart of Information Technology's Security Strategic Plan

Target Security Management



- Akan menerapkan secara aktif dan reguler VA dan pentester.
- Melakukan investasi untuk perbaikan infrastruktur.
- Peningkatan prosedur keamanan yg komprehensif dan sesuai dengan standar SOP keamanan yang sudah ditentukan.
- Akan melakukan program kesadaran keamanan yang terintegrasi dan terpadu serta melakukan penegakan kesadaran prosedur keamanan.
- *IT Section* akan dilibatkan dalam proses pengembangan aplikasi baru.

- Will actively and regularly implement VA and pentester.
- Investing in infrastructure improvement.
- Enhanced comprehensive security procedures and in accordance with the predetermined security SOP standards.
- Will carry out integrated and unified security awareness programs and enforce awareness of security procedures.
- IT Section will be involved in the process of developing new applications.

Penerapan Manajemen Risiko dalam Penggunaan Teknologi Informasi

Integrasi TI dalam kegiatan operasional Bank dapat meningkatkan risiko yang dihadapi. Oleh karenanya, Bank mengimplementasikan manajemen risiko pada penggunaan TI melalui 4 (empat) aspek berikut:

Implementation of Risk Management in the Use of Information Technology

IT integration within the Bank operational activities may increase the risks encountered. Therefore, the Bank implements risk management in the use of IT through the following 4 (four) aspects:

Pengawasan Aktif Dewan Komisaris dan Direksi

Penggunaan TI di Bank memerlukan pengawasan aktif dari Dewan Komisaris dan Direksi beserta organ pendukung masing-masing. Oleh karena itu, setiap Dewan Komisaris dan Direksi memiliki wewenang dan tanggung jawab terhadap pemanfaatan TI yang diuraikan sebagai berikut:

1. Dewan Komisaris bertugas dan berwenang untuk mengevaluasi, mengarahkan, dan memantau rencana strategis serta kebijakan Bank terkait penggunaan TI, termasuk menilai pertanggungjawaban Direksi atas penerapan manajemen risiko dalam penggunaan TI; dan
2. Direksi bertugas dan berwenang menetapkan rencana strategis, kebijakan, standar, dan prosedur penggunaan TI Bank; memastikan TI mendukung pertumbuhan bisnis dan tujuan perusahaan, serta kelangsungan pelayanan kepada nasabah; menyelenggarakan kegiatan peningkatan kompetensi sumber daya manusia terkait TI; menjamin keamanan informasi dengan sistem pengelolaan yang efektif; menerapkan manajemen risiko TI secara memadai; memastikan penerapan kebijakan TI secara efektif; dan menyediakan sistem pengukuran kinerja penyelenggaraan TI.

Untuk mendukung tanggung jawab Direksi dalam tata kelola TI, Bank juga membentuk Komite Teknologi Informasi yang memberikan rekomendasi terkait aspek tata kelola TI dan manajemen risiko penggunaan TI.

Kecukupan Kebijakan, Standar, dan Prosedur Penyelenggaraan Teknologi Informasi

Kebijakan, standar, dan prosedur penyelenggaraan TI Bank secara khusus dibuat berdasarkan Peraturan Otoritas Jasa Keuangan No. 11 Tahun 2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum dan Peraturan Otoritas Jasa Keuangan No. 21 Tahun 2023 tentang Layanan Digital oleh Bank Umum. Kebijakan tersebut telah diterapkan secara konsisten dan senantiasa ditinjau kembali untuk memastikan kesesuaiannya dengan perkembangan usaha Bank dan perubahan peraturan yang berlaku. Kebijakan ini meliputi aspek tata kelola TI Bank, arsitektur TI Bank, penerapan manajemen risiko penyelenggaraan TI Bank, ketahanan dan keamanan siber Bank, penggunaan pihak penyedia jasa TI dalam penyelenggaraan TI Bank, penempatan sistem elektronik dan pemrosesan transaksi berbasis TI, pengelolaan data dan perlindungan data pribadi dalam penyelenggaraan TI Bank, penyediaan jasa TI oleh Bank, pengendalian dan audit internal dalam penyelenggaraan TI Bank, pelaporan, serta penilaian tingkat maturitas digital Bank.

Kecukupan Proses Identifikasi, Pengukuran, Pemantauan, dan Pengendalian Risiko Penggunaan Teknologi Informasi

Kebijakan, standar, dan prosedur terkait manajemen risiko TI Bank dijelaskan dalam Kebijakan TI yang disahkan melalui Surat Keputusan Direksi No. 007/SK-DIR/06/19 tanggal 27 Juni 2019 tentang Kebijakan Manajemen Risiko terkait *Information Technology.*

Active Monitoring of Board of Commissioners and Board of Directors

The use of IT at the Bank requires active monitoring by the Board of Commissioners and Board of Directors including their respective supporting organs. Therefore, the Board of Commissioners and Board of Directors each has its authority and responsibility for the use of IT, which is described as follows:

1. The Board of Commissioners has the duty and authority to evaluate, direct, and monitor the Bank's strategic plan and policies related to IT use, including to evaluate the Board of Directors' accountability for the implementation of risk management in IT use; and
2. The Board of Directors has the duty and authority to establish strategic plan, policies, standards, and procedures for the Bank's IT use; confirm that the IT supports the Company's business growth and objectives, as well as service continuity to customers; carry out activities to increase human capital competencies related to IT; guarantee information security with effective management system; implement adequate IT risk management; ensure effective implementation of IT policies; and provide performance measurement system of IT implementation.

To support the Board of Directors' responsibility in IT governance, the Bank also established an Information Technology Committee, which provides recommendations related to IT governance aspects and risk management in the use of IT.

Adequacy of Policies, Standards, and Procedures of Information Technology Implementation

Policies, standards, and procedures of the implementation of the Bank's IT are particularly prepared based on the Financial Services Authority Regulation No. 11 of 2022 on Information Technology Operations by Commercial Banks and Financial Services Authority Regulations No. 21 of 2023 on Digital Services by Commercial Banks. The policies have been applied consistently, and constantly reviewed to ensure compliance with the Bank's business development and amendments to the prevailing regulations. These policies cover aspects of Bank's IT Governance, Bank's IT architecture, risk management application in the implementation of Bank's IT, Bank cyber resilience and security, use of IT services provider in the implementation of Bank's IT, placement of electronic systems and IT-based transaction processing, data management and personal data protection in the implementation of Bank's IT, provision of IT services by the Bank, internal control and audit in the implementation of Bank's IT, reporting, and assessing the Bank's digital maturity level.

Adequacy of Risk Identification, Measurement, Monitoring, and Management Process of the Use of Information Technology

Policies, standards, and procedures related to the Bank's IT risk management are explained in IT Policy approved under Board of Directors' Decision Letter No. 007/SK-DIR/06/19 dated 27 June 2019 on Risk Management Policy related to Information Technology.

Dengan kebijakan ini, Bank memastikan kelangsungan dan stabilitas operasional TI serta mengurangi risiko yang dapat mengganggu kegiatan operasional Bank. Langkah-langkah pengendalian juga diterapkan untuk memastikan jaringan komunikasi yang disediakan Bank memenuhi prinsip kerahasiaan, integritas, dan ketersediaan.

Sistem Pengendalian Internal atas Penggunaan Teknologi Informasi

Bank melaksanakan pengendalian internal terhadap seluruh aspek penggunaan TI melalui audit rutin oleh Divisi SKAI & *Anti Fraud*. Selama tahun 2023, terdapat 12 (dua belas) temuan terkait TI dengan level risiko *"Low to Moderate"*, antara lain:

1. *Review user access*;
2. *Clear screen*;
3. *Physical entry log book*;
4. Prosedur pengadaan jasa;
5. Pedoman Biro Hukum;
6. Tanggal dokumen user *acceptance test*;
7. Tanggal pembuatan dan persetujuan Dokumen *Functional Specification Document* dan Dokumen Persyaratan Bisnis;
8. Perubahan kebijakan manajemen risiko;
9. *Role* pada *user access matriks*;
10. *Review* berkala terhadap kebijakan dan prosedur;
11. *Log backup operations*; dan
12. Dokumentasi insiden.

Tim IT telah menindaklanjuti semua temuan tersebut dan seluruh temuan telah diselesaikan.

With this policy, the Bank ensures the continuity and stability of IT operations, as well as reduces risks that may disrupt the Bank's operational activities. Control measures are also implemented to ensure that the communication network provided by the Bank meets the principles of confidentiality, integrity, and availability.

Internal Control System for the Use of Information Technology

The Bank exercises internal control over all aspects of IT use through regular audits by the SKAI & Anti Fraud Division. During 2023, there were 12 (twelve) findings related to IT with a risk level of "Low to Moderate", including:

1. Review user access;
2. Clear screen;
3. Physical entry log book;
4. Service procurement procedures;
5. Legal Bureau Guidelines;
6. Date of user acceptance test document;
7. Date of creation and approval of the Functional Specification Document and Business Requirements Document;
8. Changes in risk management policies;
9. Role in the user access matrix;
10. Periodic review of policies and procedures;
11. Log backup operations; and
12. Incident documentation.

The IT team followed up on all these findings and all findings were duly resolved.

Pengembangan Teknologi Informasi Tahun 2023

Bank Victoria telah melakukan pengembangan TI untuk mendukung *customer experience* dalam meningkatkan layanan nasabah dan mendekatkan Bank kepada nasabah. Selama tahun 2023, pengembangan TI yang telah dilaksanakan Bank Victoria sebagai berikut:

Information Technology Development in 2023

Bank Victoria has developed IT to support the customer experience in improving customer service and bringing the Bank closer to the customer. Throughout 2023, the IT development carried out by Bank Victoria was as follows:

Tujuan Objectives	Bagian Penambahan Additional Part	Pelaksanaan Additional Part
Enhancement SBN Ritel	*Revamp* SBN Ritel Konvensional dan pengembangan SBN Syariah Ritel Revamping Conventional Retail SBN and development of Retail Sharia SBN	Triwulan 1 Quarter 1
Big Data	Penggunaan *big data* untuk *fraud detection system* Use of big data for fraud detection systems	Triwulan 1 Quarter 1
Sistem Layanan Informasi Keuangan (SLIK) Financial Information Services System (SLIK)	Penggantian aplikasi SLIK SLIK application replacement	Triwulan 1 Quarter 1
Whatsapp Official and Chatbot AI	Penggunaan *Whatsapp Official* Bank Victoria termasuk *Chatbot AI* Use of Official Bank Victoria WhatsApp including AI Chatbot	Triwulan 2 Quarter 2
Host Security Module	Penggantian *host security module 10K* Replacement of 10K host security module	Triwulan 2 Quarter 2

Tujuan Objectives	Bagian Penambahan Additional Part	Pelaksanaan Additional Part
Server Konsolidasi Consolidation Server	Penggantian server *simplivity* Replacement of simplivity server	Triwulan 2 Quarter 2
Firewall	Penggantian *firewall* termasuk dengan *router* dan *switch* Replacement of firewall including routers and switches	Triwulan 2 Quarter 2
Revamp Internet Banking and Mobile Banking	*Revamp internet banking individual* dan *mobile banking* termasuk *digital onboarding* Revamping individual internet banking and mobile banking including digital onboarding	Triwulan 4 Quarter 4

Bank juga telah menerapkan pengendalian sistem manajemen keamanan informasi secara konsisten dan telah memperoleh Sertifikasi ISO 27001 terkait *Information Security*.

Tidak hanya itu, secara spesifik pada tahun 2023, Bank Victoria mengembangkan teknologi sistem informasi dan infrastruktur pendukung kegiatan usaha Bank yang meliputi:
1. *Revamp internet banking* bisnis;
2. *Digital operation*, yaitu layanan transaksi non-tunai nasabah melalui *video call*;
3. *Peer to peer lending*, yaitu kerja sama dengan *digital lending ecosystems*;
4. *Loan channelling* melalui *financial technology*, bank perkreditan rakyat, *multifinance*, dan koperasi;
5. Implementasi *single sign on* dan *privellege access management*; dan
6. *Cloud server* untuk penyimpanan *e-document* di *cloud*.

Pada tahun 2023, Bank mengeluarkan biaya sebesar Rp39,86 miliar untuk pengembangan infrastruktur sistem TI, seperti *hardware, software, security device, maintenance,* jaringan komunikasi, *manage service, data center,* audit, dan *penetration testing*.

Strategi Pengembangan Teknologi Informasi Tahun 2024

Untuk mendukung perkembangan bisnis, Bank telah merancang strategi pengembangan TI untuk periode 2024-2026, yang dijelaskan sebagai berikut:
1. BI-*Fast* melalui *internet banking* dan *mobile banking*;
2. *Revamp internet banking business* dan *cash management*;
3. *Digital signature*;
4. Penambahan kerja sama *bancassurance* dengan rekanan asuransi untuk produk tradisional dan non-tradisional secara digital melalui *internet banking* dan *mobile banking;*
5. Penambahan kerja sama *bancassurance* dengan rekanan asuransi untuk produk tradisional dan non-tradisional secara konvensional melalui *over the counter;*
6. Penambahan kerja sama reksa dana dengan rekanan aset manajemen untuk produk reksa dana, baik yang dipasarkan secara digital melalui *internet banking* dan *mobile banking* maupun secara konvensional melalui *over the counter;*
7. Penambahan produk dan asuransi kredit tanpa agunan untuk karyawan nasabah *payroll* dengan model referensi;
8. *Virtual account;*

The Bank has also implemented information security management system controls consistently and has obtained ISO 27001 Certification on Information Security.

Not only that, specifically in 2023, Bank Victoria developed information system technology and business support infrastructures for the Bank's business activities which include:
1. Revamping business internet banking;
2. Digital operations, namely non-cash customer transaction services through video call;
3. Peer to peer lending, namely cooperation with digital lending ecosystems;
4. Loan channeling through financial technology, rural banks, multifinance, and cooperatives;
5. Implementation of single sign on and privilege access management; and
6. Cloud server for storing e-documents in the cloud.

In 2023, the Company spent a cost of Rp39.86 billion for developing IT system infrastructure, such as hardware, software, security devices, maintenance, communication networks, manage services, data centers, audits, and penetration testing.

Information Technology Development Strategy in 2024

To support business development, the Bank has prepared IT development strategies for the 2024-2026 period as described below:
1. BI-Fast through internet banking and mobile banking;
2. Revamping internet banking business and cash management;
3. Digital signature;
4. Additional bancassurance cooperation with insurance as a partner for traditional and non-traditional products digitally through internet banking and mobile banking;
5. Additional bancassurance cooperation with insurance as a partner for traditional and non-traditional products conventionally through over the counter;
6. Additional mutual fund cooperation with assets management as a partner for mutual fund products, either being marketed digitally through internet banking and mobile banking, or conventionally through over the counter;
7. Additional collateral-free product and loan insurance for payroll customer's employees with a reference model;
8. Virtual account;

9. E-meterai atau meterai digital;
10. BI-*Fast* melalui *internet banking* bisnis;
11. Penggantian *treasury system*;
12. Sinergi dengan Bank Victoria Syariah untuk layanan syariah Bank;
13. *International network payment* (*debit card);*
14. *QR Indonesia Standard* (QRIS*)*;
15. Pembelian SBN dan SBSN Ritel melalui *internet banking* dan *mobile banking*;
16. QRIS tuntas;
17. QRIS untuk *acquire*;
18. QRIS *merchant*;
19. *Cardless withdrawal* (tarik tunai tanpa kartu);
20. Bank persepsi melalui *internet banking* dan *mobile banking*;

21. Fitur *internet banking* dan *mobile banking*: *digital form*, Victoria *mart*, *cardless withdrawal* (ATM dan cabang), QRIS (transfer, *payment,* dan *cross border*), *bancassurance*, reksa dana, sosial dan keagamaan, *lifestyle* (Victoria *mart*), *remittance*, *top up e-money* (Bank Mandiri) – *e-wallet*, *point reward*, *video banking* dan *digital operation*, WhatsApp - *chat bot*, Victoria *advertisement*, BI-*Fast*, dan bank persepsi;
22. Bank persepsi melalui *internet banking* bisnis;
23. Penambahan fitur *internet banking* dan *mobile banking*: *cardless withdrawal* melalui minimarket dan kantor pos, transfer keluar negeri (*remittance* melalui *startup*), *subscribe* atau berlangganan layanan pemberitaan *online*, kerja sama dengan *payment gateway*, kerja sama dengan *agregator voucher cross border* (luar negeri), penambahan kerja sama dengan yayasan sosial keagamaan melalui *channel internet banking* dan *mobile banking*, menambahkan *join 'and'*; *join 'or'*; dan *QQ account* yang dapat dilakukan melalui *internet banking* dan *mobile banking*, *cross border payment, member get member,* tabungan berhadiah, tabungan rencana/ berjangka, dan situs web *marketing*;
24. *Mobile banking corporate;*
25. Kerja sama dengan *peer to peer lending/open application programming interface* kerja sama dengan *digital lending ecosystem*;
26. *Digital onboarding* melalui *micro site* Bank untuk nanti akan dapat dikoneksikan oleh pihak *front end* lain yang menjadi *channel digital onboarding* yang bekerja sama dengan Bank;
27. Kerja sama dengan *third party* untuk *acquire* nasabah sekaligus memberikan layanan *financial planning* fitur dan edukasi finansial;
28. *Bancassurance* melalui digital;
29. Reksa dana melalui digital;
30. *Loan channeling* melalui *financial technology*, bank perkreditan rakyat, *multifinance,* dan koperasi;
31. *Victoria* ID (Victoria Group);
32. *Digital form transactions (internet banking* dan *mobile banking)* melalui *video banking Bank;* dan
33. *Digital operations* (layanan transaksi non-tunai nasabah melalui *video call).*

9. E-stamp or digital stamp;
10. BI-Fast through business internet banking;
11. Replacement of treasury system;
12. Synergy with Bank Victoria Syariah for Bank sharia services;

13. International network payment (debit card);
14. QR Indonesia Standard (QRIS);
15. Purchase of SBN and Retail SBSN through internet banking and mobile banking;
16. QRIS complete;
17. QRIS for acquire;
18. QRIS merchants;
19. Cardless withdrawal (cash withdrawal without a card);
20. Collecting Bank through internet banking and mobile banking;
21. Features of internet banking and mobile banking: digital form, Victoria mart, cardless withdrawal (ATM and branches), QRIS (transfer, payment, and cross border), bancassurance, mutual funds, social, and religious, lifestyle (Victoria mart), remittance, top up e-money (Bank Mandiri) – e-wallet, reward points, video banking and digital operations, WhatsApp - chat bot, Victoria advertisement, BI-Fast, and collecting bank;
22. Collecting Bank through internet banking business;
23. Additional features of internet banking and mobile banking: cardless withdrawals through minimarkets and post offices, overseas transfers (remittances via startup), subscribing to online news services, cooperation with payment gateways, cooperation with cross border (overseas) voucher aggregators, additional cooperation with religious social foundations via internet banking and mobile banking channels, adding join 'and'; join 'or'; and QQ account which can be done through internet banking and mobile banking, cross border payment, member get member, prize savings, planned/term savings, and marketing websites;

24. Corporate mobile banking;
25. Cooperation with peer to peer lending/ open application programming interface cooperation with digital ecosystem lending;
26. Digital onboarding through the Bank's micro site to be connected by other front end parties of digital onboarding channels that work with the Bank;
27. Cooperation with third parties to acquire customers while providing financial planning features and financial education services;
28. Digital Bancassurance;
29. Digital mutual fund;
30. Loan channeling through financial technology, rural banks, multifinance, and cooperatives;
31. Victoria ID (Victoria Group);
32. Digital form transactions (internet banking and mobile banking) through video banking Bank; and
33. Digital operations (customer's non-cash transaction service through video call).

TATA KELOLA PERUSAHAAN

Good Corporate Governance





Dasar dan Prinsip Implementasi GCG
Basis and Principles of GCG Implementation

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

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

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

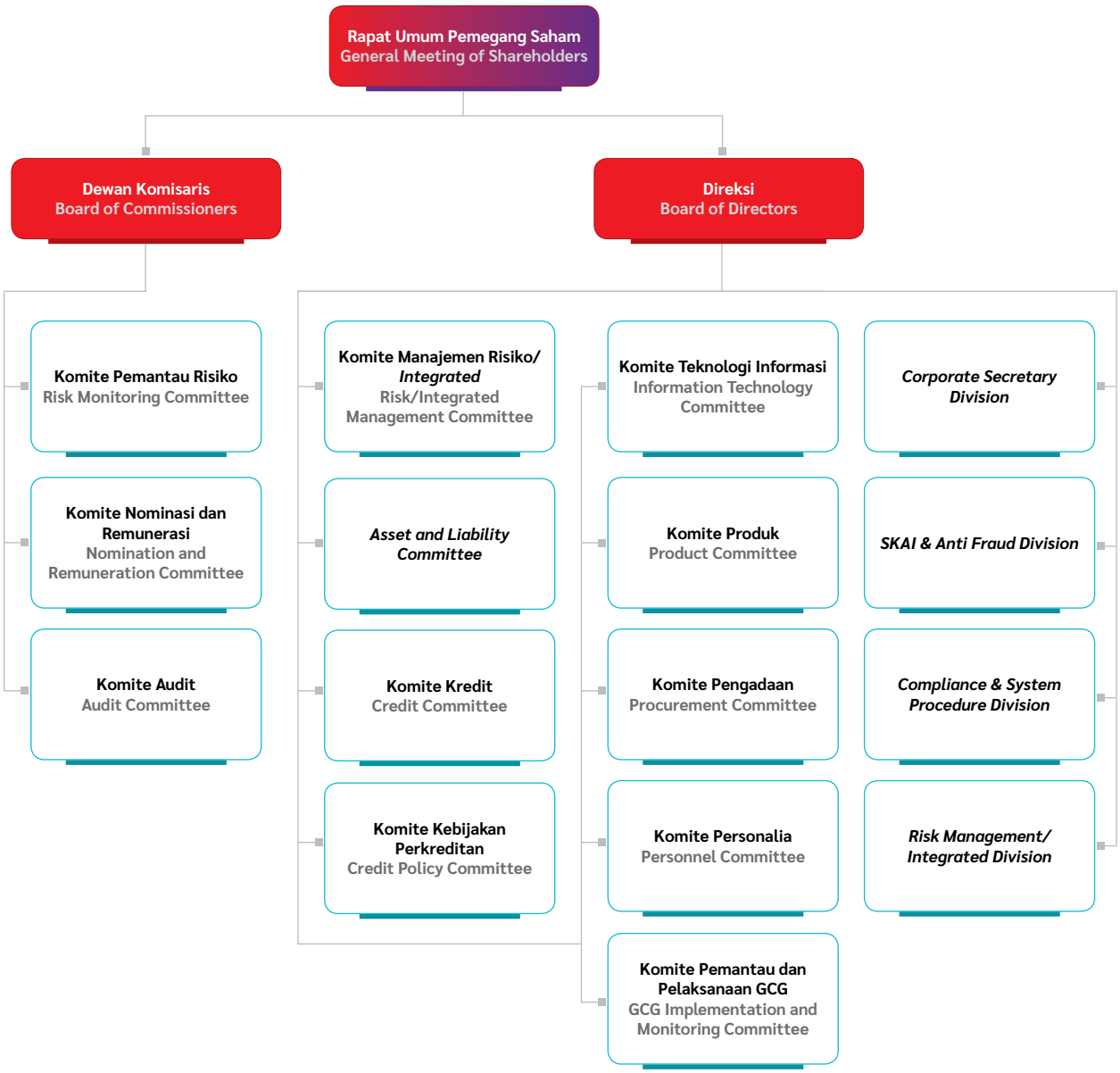
The principles in PUGKI 2021 along with the recommendations and guidelines stated therein are inspired by 4 (four) pillars of corporate governance, namely ethical behavior, accountability, transparency, and sustainability. These governance pillars are the latest developments of basic values of transparency,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

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

Struktur GCG
GCG Structures

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

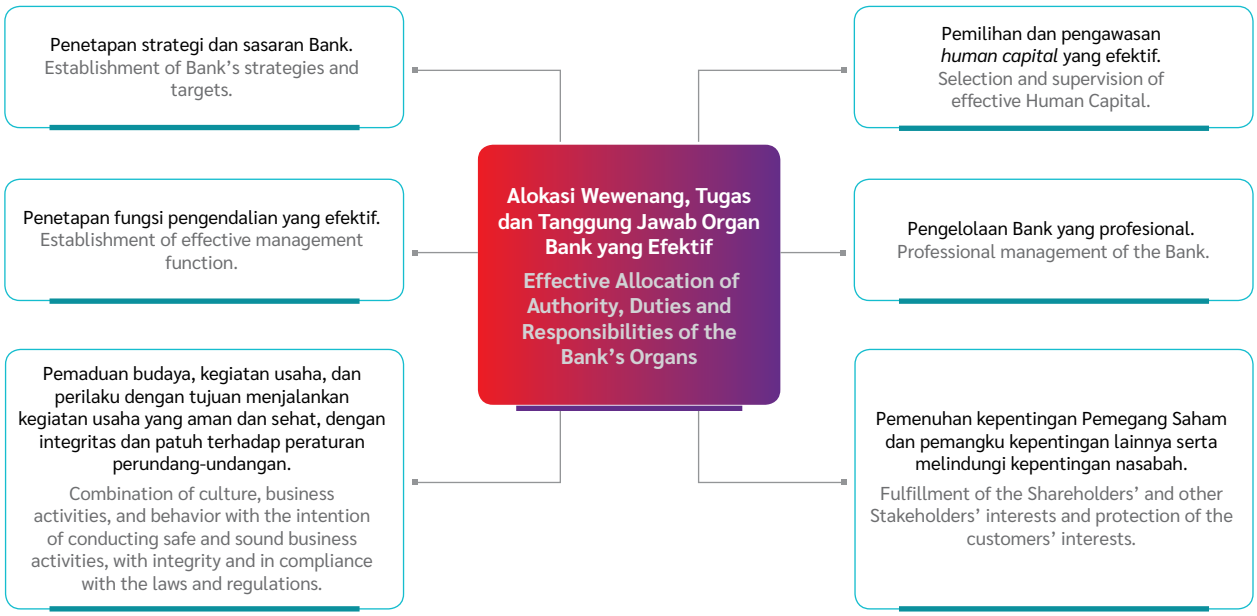
Bank Victoria's governance structure is broadly illustrated in the Bank's main organs, which are the General Meeting of Shareholders (GMS), the Board of Commissioners, and the Board of Directors. To assist in implementing their duties, as stipulated by the regulations, the Board of Commissioners and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



Framework GCG
GCG Framework

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

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



Peningkatan Kualitas Implementasi GCG
Improvement of GCG Implementation Quality

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

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

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

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

Penilaian Penerapan GCG

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

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

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

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

Assessment of GCG Implementation

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

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

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

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

Indikator Indicator	Peringkat Rating	Definisi Peringkat Rating Definition
Individu Individual	2	Bank telah melakukan penerapan GCG yang secara umum baik, tercermin dari penerapan terhadap 11 (sebelas) aspek yang telah dituangkan dalam analisis. Secara umum, beberapa kelemahan yang ada kurang signifikan dari semester sebelumnya dan dapat diselesaikan dengan tindakan normal oleh manajemen Bank. The Bank has implemented GCG, which in general is good, as reflected in the implementation of the 11 (eleven) aspects outlined in the analysis. In general, some of the existing weaknesses were less significant compared from the previous semester and can be resolved with normal action by the management of the Bank.

Skor penilaian *self assessment* GCG tersebut, diperoleh berdasarkan analisis kesesuaian pelaksanaan penilaian sendiri GCG Bank Victoria secara individu dengan 3 (tiga) aspek, yaitu *governance structure*, *governance process*, dan *governance outcome* untuk setiap kriteria, serta tindak lanjutnya diuraikan sebagai berikut:

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

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

Governance Structure:	**Governance Structure:**
1. Bank telah memenuhi struktur GCG dan sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum. Hal tersebut dibuktikan dengan komposisi anggota Dewan Komisaris, Direksi, Komite-Komite Bank (Komite di bawah Dewan Komisaris dan Komite di bawah Direksi) serta Satuan Kerja pada Bank telah sesuai dengan regulasi yang berlaku. Organ tata kelola tersebut juga telah melaksanakan tugas serta tidak ada intervensi dari pemilik/Pemegang Saham Pengendali pada operasional Bank; 2. Direksi Bank telah menyusun, menetapkan serta mengevaluasi dan menginikan struktur organisasi dengan kejelasan tugas dan tanggung jawab terkait penerapan manajemen risiko yang disesuaikan dengan tujuan dan kebijakan usaha, serta ukuran dan kompleksitas kegiatan usaha Bank yang selaras dengan Rencana Bisnis Bank; 3. Dewan Komisaris telah bertanggung jawab kepada Pemegang Saham dalam hal pengawasan serta memberi saran dan/atau arahan atas kebijakan Direksi terhadap operasional Bank secara umum yang mengacu kepada rencana bisnis yang telah ditetapkan, serta memastikan kepatuhan terhadap seluruh peraturan dan perundang-undangan yang berlaku; 4. Dewan Komisaris dalam menjalankan perannya terus memastikan Bank telah dikelola sesuai kepentingan pemangku kepentingan. Dewan Komisaris juga senantiasa menjaga objektivitas dan independensi dalam menjalankan tugas, sehingga tidak terlibat dalam pengambilan keputusan operasional Bank, kecuali hal-hal yang diatur dan ditetapkan dalam Anggaran Dasar Bank dan peraturan perundang-undangan; dan 5. Bank juga telah menerapkan prinsip 3 (tiga) lini pertahanan (*three line of defense)* untuk sistem pengendalian internal. Setiap lini pertahanan memiliki serangkaian tanggung jawab khusus untuk manajemen dan pengendalian risiko.	1. The Bank has met the GCG structure and in line with the provisions of Financial Services Authority Regulation No. 17 of 2023 on Implementation of Governance for Commercial Banks. This is shown by the composition of members of the Board of Commissioners, Board of Directors, Bank Committees (Committees under Board of Commissioners and Committees under Board of Directors) and Work Units at the Bank are in line with the applicable regulations. These governance organs have also done their duties without intervention from the owner/controlling shareholder in the Bank's operations; 2. The Board of Directors of the Bank has prepared, set, evaluated and updated the organizational structure with clear duties and responsibilities related to the implementation of risk management that is suited to the business objectives and policies, as well as the size and complexity of the Bank's business activities that is align with the Bank's Business Plan; 3. The Board of Commissioners is hold accountable to the Shareholders in supervising and providing advice and/or direction on Board of Directors' policies regarding the Bank's operations, which in general refer to the established business plan, and ensuring compliance with all of the applicable laws and regulations; 4. In carrying out its role, the Board of Commissioners constantly ensuring the Bank is managed in line with the stakeholders' interests. Also, the Board of Commissioners always maintains objectivity and independence in carrying out its duties, so they are not involved in making operational decisions at the Bank, unless for matters regulated and stipulated in the Bank's Articles of Association and statutory regulations; dan 5. The Bank has also implemented the 3 (three) lines of defense in its internal control system. Each line of defense has specific responsibilities set for the risk management and control.
Governance Process:	**Governance Process:**
1. Direksi telah melaksanakan tugasnya sesuai kewenangannya berdasarkan Anggaran Dasar. Dalam pelaksanaan tugas dan tanggung jawabnya termasuk dalam upaya pencapaian Rencana Bisnis Bank, Direksi berpedoman pada peraturan perundang-undangan, Anggaran Dasar, *BOD Charter* maupun kebijakan GCG yang berlaku, sehingga Direksi memastikan bahwa prinsip kehati-hatian, ketentuan batas maksimum pemberian kredit, ketentuan pihak terkait, dan sebagainya dapat dipatuhi; 2. Dewan Komisaris telah melakukan pengawasan terhadap kinerja Direksi, baik melalui mekanisme rapat maupun berdasarkan masukan dari Komite, serta memberikan saran dan/atau arahan secara tertulis; 3. Direktur yang membawahi kepatuhan telah memastikan kepatuhan Bank terhadap ketentuan yang berlaku. Pelaksanaan fungsi Audit Internal Bank telah berjalan sesuai dan memenuhi pedoman internal sesuai dengan standar minimum yang telah ditetapkan dalam Standar Pelaksanaan Fungsi Audit Intern Bank. Selain itu, SKAI juga telah menjalankan fungsinya secara independen dan objektif; 4. Penunjukan *Compliance Champion* pada setiap divisi dan/atau cabang dengan tugas membantu unit kepatuhan dalam melakukan sosialisasi peraturan dan/atau SOP di divisi dan/atau di setiap cabang. Pada semester II tahun 2023, telah dilaksanakan sosialisasi peraturan dan/atau SOP yang bertujuan untuk meningkatkan terciptanya budaya kepatuhan pada seluruh kegiatan usaha pada setiap jenjang organisasi; dan 5. Penunjukan akuntan publik telah melalui mekanisme yang diatur dalam kebijakan dan audit dilakukan secara independen dan profesional.	1. The Board of Directors has conducted the duties in line with the authority set by the Articles of Association. In implementing the duties and responsibilities, including efforts to achieve the Bank's Business Plan, the Board of Directors is guided by the statutory regulations, Articles of Association, BOD Charter and applicable GCG policies, so the Board of Directors ensures that the prudence principle, provisions on maximum credit limit, and provisions of related parties, etc. can be adhered; 2. The Board of Commissioners has supervised the Board of Directors' performance, both through meeting mechanisms and based on Committee's inputs, and through written suggestions and/or directions; 3. The Director in charge of compliance has ensured the Bank's compliance with applicable regulations. The implementation of the Bank's Internal Audit function has been conducted in line with and meets the internal guidelines of the minimum standards set out in the Bank's Internal Audit Function Implementation Standards. In addition, SKAI has also conducted its functions independently and objectively; 4. The appointment of a Compliance Champion in each division and/or branch with the duty to assist the compliance unit in disseminating regulations and/or SOPs in each division and/or branch. In the second semester of 2023, dissemination of regulations and/or SOPs has been done with the objectives to encourage the creation of compliance culture in all business activities at every level of the organization; and 5. The public accountant's appointment has been done through mechanism set in the policy and the audit has been conducted independently and professionally.

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

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

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

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

Rekomendasi dan Tindak Lanjut Penilaian GCG

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

Recommendation and Follow-Up on GCG Assessment

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

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

Rapat Umum Pemegang Saham
General Meeting of Shareholders

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

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

Informasi mengenai Keputusan RUPS Tahun 2023

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

GMS Implementation in 2023

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

RUPS Tahunan 26 Mei 2023
Annual GMS 26 May 2023

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

Hasil Keputusan RUPS Tahunan 26 Mei 2023
Resolutions of Annual GMS 26 May 2023

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

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

Informasi dan Realisasi mengenai Keputusan RUPS Tahunan 2022

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

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

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

RUPS Tahunan 3 Juni 2022

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

Information and Realization of the 2022 Annual GMS Resolutions

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

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

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

Annual GMS 3 June 2022

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

RUPS Luar Biasa 10 Agustus 2022

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

RUPS Luar Biasa 19 Oktober 2022

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

Extraordinary GMS 10 August 2022

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

Extraordinary GMS 19 October 2022

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

Dewan Komisaris
Board of Commissioners

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

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

Pedoman Dewan Komisaris

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

Board of Commissioners Charter

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

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

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

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

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

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

1. Melakukan koordinasi dan memberikan pengarahan kepada anggota Dewan Komisaris; 2. Mengoordinasikan pengawasan yang dilakukan oleh anggota Dewan Komisaris sesuai dengan bidangnya masing-masing; 3. Menyelenggarakan dan memimpin: a. Rapat internal Dewan Komisaris; dan b. Rapat gabungan Dewan Komisaris dan Direksi guna membahas dan mengevaluasi perkembangan laporan kinerja Direksi; 4. Melakukan pengawasan kegiatan pada bidang-bidang: a. *Good Corporate Governance*; b. *Compliance & System Procedure;* c. *Risk Management/Integrated;* d. Tata Kelola Terintegrasi/*Integrated Corporate Governance*; dan e. SKAI/*Integrated & Anti Fraud*; 5. Melakukan pengawasan kegiatan bidang Internal Audit; 6. Memberikan tugas lain kepada anggota Dewan Komisaris; 7. Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya; 8. Mengambil alih tugas Komisaris lainnya apabila yang bersangkutan berhalangan; serta 9. Memimpin rapat gabungan antara Direksi dan Dewan Komisaris.	1. Coordinating and providing direction to the Board of Commissioners' members; 2. Coordinating the supervision carried out by the Board of Commissioners' members according to their respective fields; 3. Organizing and leading: a. Board of Commissioners internal meeting; and b. Joint meetings of the Board of Commissioners and Board of Directors to discuss and evaluate the progress of the Board of Directors' performance reports; 4. Supervising activities in the following areas: a. Good Corporate Governance; b. Compliance & System Procedure; c. Risk Management/Integrated; d. Integrated Corporate Governance; and e. SKAI/Integrated & Anti Fraud; 5. Supervising activities in Internal Audit areas; 6. Giving other duties to the Board of Commissioners' members; 7. Creating a draft of memorandum to the Board of Directors relating to the field supervision and development; 8. Taking over the duties of other Commissioners in the event the person concerned is absent; and 9. Leading joint meetings between the Board of Directors and Board of Commissioners.

Gunawan Tenggarahardja
Komisaris/Komisaris Independen
Commissioner/Independent Commissioner

1. Melakukan pengawasan kegiatan bidang-bidang: a. Perkreditan; b. *Information Technology*; c. *Human Capital Management & General Affair*; d. *Corporate Legal*; dan e. *Credit Legal*; 2. Membahas permasalahan-permasalahan bidang yang berada di bawah pengawasannya; 3. Membantu mempersiapkan penyusunan laporan bagi Otoritas Jasa Keuangan pada setiap akhir semester, khususnya mengenai bidang-bidang yang berada di bawah pengawasannya; 4. Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya; serta 5. Mewakili tugas Komisaris Utama dan Komisaris lainnya, apabila yang bersangkutan berhalangan.	1. Supervising activities in the following areas: a. Credit; b. Information Technology; c. Human Capital Management & General Affair; d. Corporate Legal; and e. Credit Legal; 2. Discussing issues in the areas under their supervision; 3. Assisting the preparation of reports for the Financial Services Authority at the end of each semester, particularly regarding the fields under their supervision; 4. Creating a draft of memorandum to the Board of Directors relating to the field supervision and development; and 5. Representing the duties of the President Commissioner and other Commissioners, in the event the person concerned cannot

Sia Leng Ho
Komisaris
Commissioner

1. Melakukan pengawasan kegiatan bidang-bidang: a. *Retail Banking, Branch Banking Network & Performance*; b. *Finance & Accounting*; c. *Operations*; d. *Loan Operations*; dan e. *Treasury & International Banking;* 2. Membahas permasalahan-permasalahan bidang yang berada di bawah pengawasannya; 3. Membantu mempersiapkan penyusunan laporan bagi Otoritas Jasa Keuangan pada setiap akhir semester, khususnya mengenai bidang-bidang yang berada di bawah pengawasannya; 4. Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya; serta 5. Mewakili tugas Komisaris Utama dan Komisaris lainnya, apabila yang bersangkutan berhalangan.	1. Supervising activities in the following areas: a. Retail Banking, Branch Banking Network & Performance; b. Finance & Accounting; c. Operations; d. Loan Operations; and e. Treasury & International Banking; 2. Discussing issues in the areas under their supervision; 3. Assisting the preparation of reports for the Financial Services Authority at the end of each semester, particularly regarding the fields under their supervision; 4. Creating a draft of memorandum to the Board of Directors relating to the field supervision and development; and 5. Representing the duties of the President Commissioner and other Commissioners, in the event the person concerned cannot attend the meeting.

Wewenang Dewan Komisaris

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

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

Authority of the Board of Commissioners

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

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

Jumlah, Komposisi, dan Independensi Dewan Komisaris

Jumlah dan Komposisi

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

Number, Composition, and Independence of the Board of Commissioners

Number and Composition

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

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

Independensi

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

Penilaian Kemampuan dan Kepatutan Dewan Komisaris

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

Komisaris Independen

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

1. Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan Bank dalam waktu 6 (enam) bulan terakhir, kecuali untuk pengangkatan kembali sebagai Komisaris lndependen Bank pada periode berikutnya;
2. Tidak mempunyai saham baik langsung maupun tidak langsung pada Bank;
3. Tidak mempunyai hubungan afiliasi dengan Bank, anggota Dewan Komisaris, anggota Direksi atau Pemegang Saham Utama Bank; dan
4. Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank tersebut.

Pernyataan Independensi

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

Independence

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

Fit and Proper Test for the Board of Commissioners

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

Independent Commissioner

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

1. Not being employed nor having the authority and responsibility to plan, lead, control, or supervise the Bank's activities within the last 6 (six) months, except for reappointment as the Bank's Independent Commissioner in the next period;
2. Not possessing any shares in the Bank, either directly or indirectly;
3. Not having affiliation relationship with the Bank, members of Board of Commissioners, members of Board of Directors, or the Bank's Main Shareholders; and
4. Not having business relationship, either directly or indirectly, that are related to the Bank's business activities.

Statement of Independency

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

Rapat Dewan Komisaris

Kebijakan Rapat Dewan Komisaris

Dewan Komisaris minimal melaksanakan 1 (satu) kali rapat internal selama 2 (dua) bulan dan minimal 1 (satu) kali dalam 4 (empat) bulan rapat gabungan dengan Direksi. Rapat wajib dihadiri oleh seluruh anggota Dewan Komisaris secara fisik minimal 2 (dua) kali dalam 1 (satu) tahun, dan apabila anggota Dewan Komisaris tidak dapat hadir dalam rapat Dewan Komisaris secara fisik, maka Dewan Komisaris dapat menghadiri rapat melalui teknologi *teleconference*.

Frekuensi Kehadiran Rapat Dewan Komisaris

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

Board of Commissioners' Meetings

Board of Commissioners' Meeting Policy

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

Board of Commissioners' Frequency of Attendance in Meetings

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

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

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

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

Agenda Rapat Internal Dewan Komisaris

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

Agenda of Board of Commissioners' Internal Meeting

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

Agenda Rapat Gabungan dengan Direksi

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

Agenda of Joint Meeting with Board of Directors

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

Persetujuan dan Rekomendasi Dewan Komisaris

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

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

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

Board of Commissioners' Approvals and Recommendations

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

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

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

Sertifikasi Manajemen Risiko Dewan Komisaris

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

Board of Commissioners' Risk Management Certification

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

Direksi
Board of Directors

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

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

Pedoman Direksi

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

Board of Directors Charter

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

Ruang Lingkup Pekerjaan dan Tanggung Jawab Masing-Masing Anggota Direksi

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

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

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

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

Debora Wahjutirto Tanoyo Direktur Keuangan Director of Finance	
Direktur Keuangan dan *Loan Admin* yang membawahi Divisi: 1. *SEVP of Finance, Accounting & Management Information System;* 2. *Accounting Division;* 3. *Management Information System (MIS);* 4. *Loan & Trade Operation Division;* 5. *Credit Legal Division;* dan 6. *Branch Branking Network & Digital; Sales Division.*	Director of Finance and Loan Admin in charge of Divisions of: 1. SEVP of Finance, Accounting & Management Information System; 2. Accounting Division; 3. Management Information System (MIS); 4. Loan & Trade Operation Division; 5. Credit Legal Division; and 6. Branch Branking Network & Digital; Sales Division.
Tamunan **Direktur Kepatuhan dan Manajemen Risiko** **Director of Compliance and Risk Management**	
Direktur Kepatuhan dan Manajemen Risiko yang membawahi Divisi/Unit/Departemen: 1. *Compliance & System Procedure Division;* 2. *Risk Management/Integrated Division*; 3. *Corporate Secretary Division*; dan 4. *Anti Money Laundering, Counter Terrorist Financing & Weapon Mass Destruction (AML, CTF & WMD).*	Director of Compliance and Risk Management in charge of Divisions/Unit/Department: 1. Compliance & System Procedure Division; 2. Risk Management/Integrated Division; 3. Corporate Secretary Division; and 4. Anti Money Laundering, Counter Terrorist Financing & Weapon Mass Destruction (AML, CTF & WMD).

Wewenang Direksi

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

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

Authority of the Board of Directors

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

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

Jumlah, Komposisi, dan Independensi Direksi

Jumlah dan Komposisi

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

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

Number and Composition

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

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

Independensi

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

Independence

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

Penilaian Kemampuan dan Kepatutan Direksi

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

Fit and Proper Test for the Board of Directors

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

Rapat Direksi

Kebijakan Rapat Direksi

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

Board of Directors' Meetings

Board of Directors' Meeting Policy

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

Frekuensi Kehadiran Rapat Direksi

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

Board of Directors' Frequency of Attendance in Meetings

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

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

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

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

Agenda Rapat Internal Direksi

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

Agenda of Board of Directors' Internal Meeting

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

Agenda Rapat Gabungan dengan Dewan Komisaris

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

Agenda of Joint Meeting with Board of Commissioners

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

Persetujuan dan Rekomendasi Direksi

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

Board of Directors' Approvals and Recommendations

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

Sertifikasi Manajemen Risiko Direksi

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

Board of Directors' Risk Management Certification

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

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

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

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

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

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

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

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

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

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

Penilaian Kinerja Dewan Komisaris

Prosedur Pelaksanaan Penilaian Kinerja Dewan Komisaris

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

Board of Commissioners' Performance Asssessment

Procedures for the Board of Commissioners' Performance Assessment

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

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

Penilaian Sendiri
Self-Assessment

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

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

Peer Evaluation

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

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

Kriteria Penilaian Kinerja Dewan Komisaris

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

Criteria for Assessing the Board of Commissioners' Performance

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

Penilaian Sendiri Self-Assessment	
Kriteria terkait penilaian sendiri Dewan Komisaris mencakup 16 (enam belas) indikator *governance structure*, 17 (tujuh belas) indikator *governance process*, dan 6 (enam) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum.	Criteria related to the Board of Commissioners' self-assessment include 16 (sixteen) governance structure indicators, 17 (seventeen) governance process indicators, and 6 (six) governance outcome indicators as stipulated in Attachment III to the Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks.
Peer Evaluation	
1. Kehadiran dalam rapat internal Dewan Komisaris, rapat gabungan Dewan Komisaris bersama Direksi, rapat Dewan Komisaris dengan Pemegang Saham, dan rapat Dewan Komisaris atau Komite dengan Unit Kerja Bank; 2. Integritas (misalnya benturan kepentingan yang muncul); 3. Pengetahuan dan pemahaman atas nilai-nilai misi, rencana jangka panjang Bank, dan refleksi pemahaman ini kepada isu-isu penting sepanjang tahun; 4. Kemampuan untuk menyampaikan, memberikan argumentasi, dan memberikan solusi mengenai isu-isu strategis Bank; 5. Kemampuan dalam mengikuti isu-isu dan tren yang berpengaruh terhadap Bank dan menggunakan informasi tersebut untuk menilai dan mengarahkan kinerja Bank, bukan hanya dari tahun ke tahun, akan tetapi juga dalam jangka panjang; serta 6. Hubungan anggota Dewan Komisaris dengan sesama anggota Dewan Komisaris lainnya, dengan Direksi, dan pihak-pihak lain yang diatur dalam Anggaran Dasar dan peraturan perundang-undangan.	1. Attendance at internal meetings of the Board of Commissioners, joint meetings of the Board of Commissioners and the Board of Directors, meetings between the Board of Commissioners and Shareholders, and meetings between the Board of Commissioners or Committee with the Bank's Work Units; 2. Integrity (for example conflicts of interest that arise); 3. Knowledge and understanding of the values of the mission, the Bank's long-term plan, and the reflection of this understanding on important issues throughout the year; 4. Ability to convey, provide arguments and solutions regarding the Bank's strategic issues; 5. Ability to follow issues and trends that affect the Bank and use this information to assess and direct the Bank's performance, not only from year to year, but also in the long-term; and 6. The relationship between member of the Board of Commissioners and fellow members of the Board of Commissioners, and the Board of Directors and other parties as regulated in the Articles of Association and laws and regulations.

Hasil Penilaian Kinerja Dewan Komisaris

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

The Board of Commissioners' Performance Assessment Results

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

Penilaian Sendiri
Self-Assessment

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

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

Peer Evaluation

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

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

Penilaian Kinerja Direksi

Prosedur Pelaksanaan Penilaian Kinerja Direksi

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

1. Direksi menyusun *Key Performace Indicator* (KPI) yang memuat rencana kerja, sasaran atau target yang akan dicapai dalam 1 (satu) tahun maupun triwulan;
2. Penilaian kinerja Direksi dilaksanakan oleh Dewan Komisaris, namun Direktur Utama dapat menilai Direksi lainnya;
3. Direksi melaporkan realisasi pencapaian target masing-masing KPI dalam laporan triwulan dan Laporan Tahunan kepada Dewan Komisaris, baik secara individu maupun kolektif untuk dievaluasi; serta
4. Hasil evaluasi KPI Direksi oleh Dewan Komisaris menjadi bahan penilaian pertanggungjawaban Direksi dalam pelaksanaan RUPS.

Board of Directors' Performance Asssessment

Procedures for the Board of Directors' Performance Assessment

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

1. The Board of Directors prepares Key Performance Indicator (KPI) that includes work plan, objectives, or goals to be achieved within 1 (one) year and quarterly;
2. The Board of Directors' performance is assessed by the Board of Commissioners, but the President Director can assess other Directors;
3. The Board of Directors reports the realization of target achievement for each KPI in the quarterly report and Annual Report to the Board of Commissioners, whether individually or collectively, to be evaluated; and
4. The evaluation result of Board of Directors' KPI by the Board of Commissioners becomes means in assessing the Board of Directors' accountability in the GMS.

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

Penilaian Sendiri
Self-Assessment

Penilaian sendiri Direksi dikoordinir oleh Divisi *Compliance* & *System Procedure* dan dilaporkan kepada Dewan Komisaris dan Direksi.

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

Penilaian oleh Dewan Komisaris
Assessment by the Board of Commissioners

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

Kriteria Penilaian Kinerja Direksi

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

Criteria for Assessing the Board of Directors' Performance

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

Penilaian Sendiri Self-Assessment	
Kriteria terkait penilaian sendiri Direksi mencakup 16 (enam belas) indikator *governance structure*, 14 (empat belas) indikator *governance process*, dan 10 (sepuluh) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum.	Criteria related to the Board of Directors' self-assessment include 16 (sixteen) governance structure indicators, 14 (fourteen) governance process indicators, and 10 (ten) governance outcome indicators as stipulated in Attachment III to the Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks.
Penilaian oleh Dewan Komisaris **Assessment by the Board of Commissioners**	
1. Terlaksananya kepemimpinan (*leadership*), kerja sama (*team work*), serta komunikasi dan kompetensi yang baik; 2. Terlaksananya GCG dalam setiap kegiatan usaha Bank; 3. Terlaksananya pencapaian Rencana Bisnis Bank; dan 4. Terlaksananya pengawasan atas tindak lanjut dari Direksi berdasarkan audit, rekomendasi SKAI, auditor eksternal, atau pengawasan Otoritas Jasa Keuangan.	1. The implementation of good leadership, teamwork, communication and competency; 2. The implementation of GCG in each of the Bank's business activities; 3. The achievement of the Bank's Business Plan; and 4. The implementation of monitoring and follow-up from the Board of Directors based on audit, recommendation of SKAI, external auditor, or the Financial Services Authority's supervision.

Hasil Penilaian Kinerja Direksi

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

The Board of Directors' Performance Assessment Results

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

Penilaian Sendiri
Self-Assessment

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

Penilaian oleh Dewan Komisaris
Assessment by the Board of Commissioners

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

Penilaian Kinerja Komite Pendukung Dewan Komisaris

Prosedur Pelaksanaan Penilaian Kinerja Komite Pendukung Dewan Komisaris

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

Performance Assessment of the Board of Commissioners' Supporting Committees

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

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

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

Penilaian Sendiri
Self-Assessment

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

Penilaian oleh Dewan Komisaris
Assessment by the Board of Commissioners

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

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

Penilaian Sendiri
Self-Assessment

Penilaian sendiri Komite di bawah Dewan Komisaris dalam implementasi GCG mencakup 10 (sepuluh) indikator *governance structure*, 7 (tujuh) indikator *governance process*, dan 2 (dua) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola Bagi Bank Umum.	The self-assessment of Committees under the Board of Commissioners in GCG implementation includes 10 (ten) governance structure indicators, 7 (seven) governance process indicators, and 2 (two) governance outcome indicators as stipulated in Appendix III of the Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks.

Penilaian oleh Dewan Komisaris
Assessment by the Board of Commissioners

Kriteria penilaian dibuat secara umum dan diuraikan dengan penjelasan secara kualitatif (penilaian tidak dalam angka/skala) yang mencangkup: 1. Kehadiran dalam rapat Komite; 2. Penguasaan materi yang akan dibahas; 3. Kesediaan menyediakan waktu dan upaya dalam memenuhi tugas dan tanggung jawab sebagai anggota Komite; 4. Kesediaan berpartisipasi dalam kegiatan di luar kantor, seperti kunjungan ke unit bisnis; 5. Kualitas dan saran yang diberikan dalam rapat-rapat; 6. Terlaksananya pemantauan dan evaluasi, baik secara berkala maupun tahunan, atas hal-hal yang menjadi bidang tugas dan tanggung jawab masing-masing komite; 7. Pemantauan dan koreksi penyimpangan; serta 8. Terlaksananya pemantauan dan evaluasi terhadap divisi/unit yang terkait dengan bidang tugas dan tanggung jawab masing-masing komite.	Assessment criteria are made in general and are described with qualitative explanation (ratings are not in numbers/scales) which include: 1. Attendance at Committee's meetings; 2. Mastery of the material to be discussed; 3. Willingness to provide time and efforts in fulfilling duties and responsibilities as a Committee member; 4. Willingness to participate in activities outside the office, such as visits to business units; 5. Quality and advice given in meetings; 6. Implementation of monitoring and evaluation, both periodically and annually, on matters that are the respective areas of duties and responsibilities of each committee; 7. Monitoring and correction of deviation; and 8. Implementation of monitoring and evaluation of divisions/units related to the respective areas of duties and responsibilities of each committee.

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

Penilaian Sendiri
Self-Assessment

Pada tahun 2023, hasil penilaian sendiri pelaksanaan tugas dan tanggung jawab Komite pendukung Dewan Komisaris berada pada kategori "Baik".	In 2023, the self-assessment results of the implementation of duties and responsibilities of the Board of Commissioners' supporting committees were under the category of "Good".

Penilaian oleh Dewan Komisaris
Assessment by the Board of Commissioners

Komite Audit: Dewan Komisaris menilai Komite Audit telah berhasil menjalankan tugasnya secara efektif selama tahun 2023. Komite Audit telah memantau, mengevaluasi perencanaan dan pelaksanaan audit, serta melakukan pemantauan terhadap tindak lanjut yang dilakukan oleh Direksi terkait pemenuhan komitmen hasil temuan dari pemeriksaan internal dan eksternal.	**Audit Committee:** The Board of Commissioners evaluated that the Audit Committee managed to perform its duties effectively in 2023. The Audit Committee monitored, evaluated the planning and implementation of audits, and monitored the follow-up actions taken by the Board of Directors on the fulfillment of commitments resulting from internal and external audit findings.

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

Penilaian Kinerja Komite dan Organ Pendukung Direksi

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

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

Penilaian kinerja Komite di bawah Direksi dievaluasi secara individual maupun secara kolektif setiap 1 (satu) tahun dengan menggunakan metode evaluasi dalam suatu sistem yang ditetapkan dalam keputusan Direksi. Penilaian kinerja tersebut dilakukan oleh Direksi.

Procedures and Party Assessing the Performance of the Board of Directors' Supporting Committees and Organs

Performance of the Committees under the Board of Directors is evaluated both individually and collectively once every year by using evaluation method in a system established under the Board of Directors' decision. Such performance assessment is conducted by the Board of Directors.

Kriteria dan Hasil Penilaian Kinerja Komite dan Organ Pendukung Direksi
Performance Assessment Criteria and Results of the Board of Directors' Supporting Committees and Organs

Kriteria Penilaian Komite dan Organ Pendukung Direksi Assessment Criteria of the Board of Directors' Supporting Committees and Organs	
1. Kehadiran dalam rapat Komite; 2. Penguasaan materi yang akan dibahas; 3. Kesediaan menyediakan waktu dan upaya dalam memenuhi tugas dan tanggung jawab sebagai anggota Komite; 4. Kesediaan berpartisipasi dalam kegiatan di luar kantor, seperti kunjungan ke unit bisnis; 5. Kualitas dan saran yang diberikan dalam rapat-rapat; 6. Terlaksananya pemantauan dan evaluasi, baik secara berkala maupun tahunan, atas hal-hal yang menjadi bidang tugas dan tanggung jawab masing-masing Komite; 7. Pemantauan dan koreksi penyimpangan; serta 8. Terlaksananya pemantauan dan evaluasi terhadap divisi/unit yang terkait dengan bidang tugas dan tanggung jawab masing-masing Komite.	1. Attendance at Committee's meetings; 2. Mastery of the material to be discussed; 3. Willingness to allocate time and efforts in fulfilling duties and responsibilities as Committee member; 4. Willingness to participate in activities outside the office, such as visits to business units; 5. Quality and advice given in the meetings; 6. Implementation of monitoring and evaluation, whether periodically or annually, on matters that are the respective areas of duties and responsibilities of each Committee; 7. Monitoring and correction of deviations; and 8. Implementation of monitoring and evaluation of divisions/units related to the respective areas of duties and responsibilities of each Committee.
Hasil Penilaian Kinerja Komite dan Organ Pendukung Direksi **Performance Assessment Results of the Board of Directors' Supporting Committees and Organs**	
Direksi menilai bahwa selama tahun 2023, komite dan organ pendukung Direksi telah berhasil melaksanakan tugas dan tanggung jawabnya secara optimal. Penilaian ini didasarkan pada laporan berkala, masukan, dan rekomendasi yang sesuai dengan lingkup tugas Direksi, serta penerapan tugas dan tanggung jawab masing-masing yang sejalan dengan strategi dan Rencana Bisnis Bank pada tahun 2023.	The Board of Directors considered that throughout 2023, the Board of Directors' supporting committees and organs managed to perform their duties and responsibilities optimally. This assessment is based on periodic reports, input and recommendations that are in accordance with the scope of the Board of Directors' duties, and the implementation of their respective duties and responsibilities in line with the Bank's strategy and Business Plan for 2023.

Pelatihan dan/atau Peningkatan Kompetensi Dewan Komisaris dan Direksi

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

Kebijakan Pelatihan dan/atau Peningkatan Kompetensi Dewan Komisaris dan Direksi

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

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

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

Nama dan Jabatan Name and Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers	
DEWAN KOMISARIS / BOARD OF COMMISSIONERS		
Zaenal Abidin, Ph.D Komisaris Utama Independen Independent President Commissioner	1. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 2. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 3. *Governance, Risk, and Compliance* (oleh Bank Victoria); 4. Membentuk Pribadi yang Amanah dan Terpercaya (oleh Bank Victoria); 5. *Philosophy that Flows in My Soul* (oleh Bank Victoria); dan 6. *Refreshment* Sertifikasi Manajemen Risiko (oleh PT Efektifpro Knowledge Source).	1. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Shaping a Trustworthy Individual (by Bank Victoria); 5. Philosophy that Flows in My Soul (by Bank Victoria); and 6. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source).
Gunawan Tenggarahardja Komisaris/ Komisaris Independen Commissioner/ Independent Commissioner	1. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 2. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 3. *Governance, Risk, and Compliance* (oleh Bank Victoria); 4. *Managing Environmental, Social and Governance Risks and Opportunities* (oleh Otoritas Jasa Keuangan Institute); 5. Membentuk Pribadi yang Amanah dan Terpercaya (oleh Bank Victoria); 6. Peluang Metaverse di Industri Jasa Keuangan (oleh Otoritas Jasa Keuangan Institute); 7. *Philosophy that Flows in My Soul* (oleh Bank Victoria); dan 8. *Refreshment* Sertifikasi Manajemen Risiko (oleh PT Efektifpro Knowledge Source).	1. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Managing Environmental, Social and Governance Risks and Opportunities (by Otoritas Jasa Keuangan Institute); 5. Shaping a Trustworthy Individual (by Bank Victoria); 6. Metaverse Opportunity in Financial Services Industry (by Otoritas Jasa Keuangan Institute); 7. Philosophy that Flows in My Soul (by Bank Victoria); and 8. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source).

Nama dan Jabatan Name and Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers	
Sia Leng Ho Komisaris Commissioner	1. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 2. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 3. *Governance, Risk, and Compliance* (oleh Bank Victoria); 4. *Managing Environmental, Social and Governance Risks and Opportunities* (oleh Otoritas Jasa Keuangan Institute); 5. Membentuk Pribadi yang Amanah dan Terpercaya (oleh Bank Victoria); 6. Peluang Metaverse di Industri Jasa Keuangan (oleh Otoritas Jasa Keuangan Institute); 7. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 8. *Refreshment Credit SME Segmentation* (oleh Bank Victoria); dan 9. *Refreshment* Sertifikasi Manajemen Risiko (oleh PT Efektifpro Knowledge Source).	1. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Managing Environmental, Social and Governance Risks and Opportunities (by Otoritas Jasa Keuangan Institute); 5. Shaping a Trustworthy Individual (by Bank Victoria); 6. Metaverse Opportunity in Financial Services Industry (by Otoritas Jasa Keuangan Institute); 7. Philosophy that Flows in My Soul (by Bank Victoria); 8. Refreshment Credit SME Segmentation (by Bank Victoria); and 9. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source).
DIREKSI / BOARD OF DIRECTORS		
Achmad Friscantono Direktur Utama President Director	1. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 2. *Governance, Risk, and Compliance* (oleh Bank Victoria); 3. Membentuk Pribadi yang Amanah dan Terpercaya (oleh Bank Victoria); 4. *Mini Town Hall* (oleh Bank Victoria); 5. *Outbond*: *Working Together in Harmony* (oleh Bank Victoria); 6. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 7. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 8. *Refreshment Credit SME Segmentation* (oleh Bank Victoria); 9. *Refreshment* Sertifikasi Manajemen Risiko (oleh PT Efektifpro Knowledge Source); dan 10. *Refreshment* Sertifikasi *Treasury* (oleh Association Cambiste Internationale Financial Market Association Indonesia).	1. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 2. Governance, Risk, and Compliance (by Bank Victoria); 3. Shaping a Trustworthy Individual (by Bank Victoria); 4. Mini Town Hall (by Bank Victoria); 5. Outbond: Working Together in Harmony (by Bank Victoria); 6. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 7. Philosophy that Flows in My Soul (by Bank Victoria); 8. Refreshment Credit SME Segmentation (by Bank Victoria); 9. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source); and 10. Treasury Certification Refreshment (by Association Cambiste Internationale Financial Market Association Indonesia).
Rusli Wakil Direktur Utama Deputy President Director	1. Aspek Hukum dan Dokumen Pembukaan Rekening Perusahaan (oleh Bank Victoria); 2. DEG South East Asia Client Forum 2023 *"Shaping Transformation"* (oleh DEG South East Asia Client Forum); 3. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 4. *Governance, Risk, and Compliance* (oleh Bank Victoria); 5. Membentuk Pribadi yang Amanah dan Terpercaya (oleh Bank Victoria); 6. *Mini Town Hall* (oleh Bank Victoria); 7. *Outbond*: *Together We Growth* (oleh Bank Victoria); 8. *Outbond*: *Together We Can Do More Great Things* (oleh Bank Victoria); 9. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 10. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 11. *Refreshment Credit SME Segmentation* (oleh Bank Victoria); 12. *Refreshment* Sertifikasi Manajemen Risiko (oleh PT Efektifpro Knowledge Source); dan 13. Undangan *International Talks* 2023 (oleh Bank Indonesia).	1. Legal Aspect and Documents for Opening a Corporate Account (by Bank Victoria); 2. DEG South East Asia Client Forum 2023 "Shaping Transformation" (by DEG South East Asia Client Forum); 3. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 4. Governance, Risk, and Compliance (by Bank Victoria); 5. Shaping a Trustworthy Individual (by Bank Victoria); 6. Mini Town Hall (by Bank Victoria); 7. Outbond: Together We Growth (by Bank Victoria); 8. Outbond: Together We Can Do More Great Things (by Bank Victoria); 9. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 10. Philosophy that Flows in My Soul (by Bank Victoria); 11. Refreshment Credit SME Segmentation (by Bank Victoria); 12. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source); and 13. Invitation International Talks 2023 (by Bank Indonesia).
Lembing Direktur Director	1. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 2. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 3. *Governance, Risk, and Compliance* (oleh Bank Victoria); 4. *Managing Environmental, Social and Governance Risks and Opportunities* (oleh Otoritas Jasa Keuangan Institute); 5. Membentuk Pribadi yang Amanah dan Terpercaya (oleh Bank Victoria); 6. *Mini Town Hall* (oleh Bank Victoria); 7. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 8. *Refreshment Credit SME Segmentation* (oleh Bank Victoria); dan 9. *Refreshment* Sertifikasi Manajemen Risiko (oleh PT Efektifpro Knowledge Source).	1. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Managing Environmental, Social and Governance Risks and Opportunities (by Otoritas Jasa Keuangan Institute); 5. Shaping a Trustworthy Individual (by Bank Victoria); 6. Mini Town Hall (by Bank Victoria); 7. Philosophy that Flows in My Soul (by Bank Victoria); 8. Refreshment Credit SME Segmentation (by Bank Victoria); dan 9. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source).

Nama dan Jabatan Name and Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers	
Debora Wahjutirto Tanoyo Direktur Director	1. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 2. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 3. *Governance, Risk, and Compliance* (oleh Bank Victoria); 4. *Managing Environmental, Social and Governance Risks and Opportunities* (oleh Otoritas Jasa Keuangan Institute); 5. Membentuk Pribadi yang Amanah dan Terpercaya (oleh Bank Victoria); 6. *Mini Town Hall* (oleh Bank Victoria); 7. *Philosophy that Flows in My Soul* (oleh Bank Victoria); dan 8. *Refreshment* Sertifikasi Manajemen Risiko (oleh PT Efektifpro Knowledge Source).	1. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Managing Environmental, Social and Governance Risks and Opportunities (by Otoritas Jasa Keuangan Institute); 5. Shaping a Trustworthy Individual (by Bank Victoria); 6. Mini Town Hall (by Bank Victoria); 7. Philosophy that Flows in My Soul (by Bank Victoria); dan 8. Risk Management Certification Refreshment
Tamunan Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	1. *Outlook Banking Regulation*: Tantangan Industri Perbankan, Arah Regulasi, dan *Future Banking* (oleh Lembaga Pengembangan Perbankan Indonesia); 2. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 3. *Governance, Risk, and Compliance* (oleh Bank Victoria); 4. Membentuk Pribadi yang Amanah dan Terpercaya (oleh Bank Victoria); 5. *Outbond*: *Change the Future* (oleh Bank Victoria); 6. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 7. *Refreshment* Sertifikasi Manajemen Risiko (oleh PT Efektifpro Knowledge Source); 8. Resertifikat "Sertifikasi Kompetensi Manajemen Risiko Perbankan - Kualifikasi 7" (oleh Lembaga Sertifikasi Profesional Perbankan); 9. Sosialisasi Kebijakan *Risk Register* (oleh Bank Victoria); 10. *Managing Environmental, Social and Governance Risks and Opportunities* (oleh Otoritas Jasa Keuangan Institute); 11. Sosialisasi Penguatan Kerangka Hukum terkait Pencegahan dan Pemberantasan Pendanaan Proliferasi Senjata Pemusnah Massal (dari Pusat Pelaporan dan Analisis Transaksi Keuangan); 12. Webinar dengan tema "Peluang, Harapan dan Tantangan Perekonomian Nasional" (oleh Forum Komunikasi Direktur Kepatuhan Perbankan); 13. Seminar Otoritas Jasa Keuangan *Carbon* (oleh Otoritas Jasa Keuangan); 14. *4th Legal Forum "Urgensi Regulatory Technology* dan *Digital Evidence* dalam Mendukung Efektivitas Penegakan Hukum Tindak Pidana Pencucian Uang dan Tindak Pidana Pendanaan Terorisme (oleh Forum Komunikasi Direktur Kepatuhan Perbankan); 15. *Focus Group Discussion* "Implementasi Anti Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal dan Kewajiban Pelaporan" (oleh Forum Komunikasi Direktur Kepatuhan Perbankan); 16. Undangan Kegiatan "*Risk and Governance Summit 2023*" (oleh Otoritas Jasa Keuangan); dan 17. Diseminasi Pusat Pelaporan dan Analisis Transaksi Keuangan "*Securing* Hasil Tindak Pidana Lintas Batas Negara Melalui Implementasi Regulasi Mengenai Penundaan, Penghentian, dan Pemblokiran (oleh Pusat Pelaporan dan Analisis Transaksi Keuangan).	1. Outlook Banking Regulation: Challenges in Banking Industry, Regulatory Direction, and Future Banking (by Indonesian Banking Development Institution); 2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 3. Governance, Risk, and Compliance (by Bank Victoria); 4. Shaping a Trustworthy Individual (by Bank Victoria); 5. Outbond: Change the Future (by Bank Victoria); 6. Philosophy that Flows in My Soul (by Bank Victoria); 7. Risk Management Certification Refreshment (by PT Efektifpro Knowledge Source); 8. Recertificate "Banking Risk Management Competency Certification - Qualification 7" (by Banking Professionals Certification Institute); 9. Dissemination of Risk Register Risk (by Bank Victoria); 10. Managing Environmental, Social and Governance Risks and Opportunities (by Otoritas Jasa Keuangan Institute); 11. Dissemination of Strengthening Legal Framework on the Prevention and Eradication of Funding for Proliferation of Weapons of Mass Destruction (by Financial Transaction Reports and Analysis Center); 12. Webinar with a theme "Opportunities, Hopes and Challenges of National Economy" (by Banking Compliance Directors Communication Forum); 13. Financial Services Authority Seminar: Carbon (by Financial Services Authority); 14. 4th Legal Forum "The Urgency of Regulatory Technology and Digital Evidence in Supporting the Effectiveness of Law Enforcement in Crimes of Money Laundering and Counter Terrorism Financing (by Banking Compliance Directors Communication Forum); 15. Focus Group Discussion "Implementation of Anti Money Laundering, Counter Terrorism Financing, and Prevention of Funding for Proliferation of Weapons of Mass Destruction and Reporting Obligation" (by Banking Compliance Directors Communication Forum); 16. Event Invitation "Risk and Governance Summit 2023" (by Financial Services Authority); and 17. Dissemination by Financial Transaction Reports and Analysis Center "Securing Proceeds of Cross-Border Crimes Through the Implementation of Regulations on Postponement, Termination and Blocking" (by Financial Transaction Reports and Analysis Center).

Program Orientasi bagi Anggota Dewan Komisaris dan Direksi yang Baru Diangkat

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

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

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

Penanganan Benturan Kepentingan Dewan Komisaris dan Direksi
Handling of Conflict of Interests of the Board of Commissioners and Board of Directors

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

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

Mekanisme Pengunduran Diri dan Pemberhentian Dewan Komisaris dan Direksi
Resignation and Dismissal Mechanism of the Board of Commissioners and Board of Directors

Mekanisme Pengunduran Diri

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

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

Resignation Mechanism

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

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

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

Mekanisme Pemberhentian

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

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

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

Dismissal Mechanism

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

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

Kebijakan Keberagaman Komposisi Dewan Komisaris dan Direksi

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

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

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

Kebijakan Nominasi dan Remunerasi Dewan Komisaris dan Direksi

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

Kebijakan Nominasi

Berdasarkan Pedoman Komite Nominasi dan Remunerasi, Komite Nominasi dan Remunerasi bertugas untuk menyusun suatu sistem nominasi bagi anggota Dewan Komisaris dan Direksi Bank yang akan menjadi bagian dari Kebijakan *Good Corporate Governance* dari Bank serta akan menjadi pedoman bagi Dewan Komisaris dan RUPS dalam menetapkan nominasi dan remunerasi anggota Dewan Komisaris dan Direksi.

Proses Seleksi Calon Anggota Dewan Komisaris dan Direksi

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

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

Kriteria Dewan Komisaris dan Direksi

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

Nomination Policy

Based on the Nomination and Remuneration Commitee's Charter, the Nomination and Remuneration Committee has the duty to establish a nomination system for members of Board of Commissioners and Board of Directors, which will become part of the Bank's Good Corporate Governance Policy and will be used as a guideline for the Board of Commissioners and the GMS to determine the nomination and remuneration of members of the Board of Commissioners and Board of Directors.

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

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

1. The Nomination and Remuneration Committee identifies candidates who meet the criteria;
2. The Board of Commissioners based on recommendation from the Nomination and Remuneration Committee submits to the Shareholders; and
3. The selection process is carried out prior to the expiry of the existing term of office, or upon request or in case of any vacancy in the Board of Directors' position.

Criteria of the Board of Commissioners and Board of Directors

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

1. Persyaratan Formal
   a. Cakap melakukan perbuatan hukum;
   b. Dalam 5 (lima) tahun sebelum pengangkatan dan selama menjabat:
      1) Tidak pernah dinyatakan pailit;
      2) Tidak pernah menjadi anggota Dewan Komisaris dan/atau Direksi yang dinyatakan bersalah menyebabkan suatu bank dinyatakan pailit;
      3) Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan; serta
      4) Tidak pernah menjadi anggota Dewan Komisaris dan/atau Direksi yang selama menjabat:
         - Pernah tidak menyelenggarakan RUPS Tahunan;
         - Pertanggungjawabannya sebagai anggota Dewan Komisaris dan/atau Direksi pernah tidak diterima oleh RUPS atau pernah tidak memberikan pertanggungjawaban sebagai anggota Dewan Komisaris dan/atau Direksi kepada RUPS; dan
         - Pernah menyebabkan Bank yang memperoleh izin, persetujuan, atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan Laporan Tahunan dan/atau Laporan Keuangan kepada Otoritas Jasa Keuangan.
2. Persyaratan Material
   a. Mempunyai akhlak, moral, dan integritas yang baik;
   b. Memiliki komitmen untuk mematuhi peraturan perundang-undangan; dan
   c. Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan untuk menjalankan tugasnya.
3. Persyaratan Lainnya
   a. Anggota Dewan Komisaris tidak diperkenankan merangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris, atau Pejabat Eksekutif pada lembaga keuangan (bank atau non-bank) dan pada lebih dari 1 (satu) perusahaan bukan lembaga keuangan baik yang berkedudukan di dalam negeri atau luar negeri;
   b. Anggota Dewan Komisaris tidak termasuk rangkap jabatan apabila menjabat sebagai Direksi, anggota Dewan Komisaris, atau Pejabat Eksekutif yang melaksanakan fungsi pengawasan pada 1 (satu) Entitas Anak Bank yang dikendalikan oleh Bank (konsolidasi);
   c. Komisaris non-independen tidak termasuk rangkap jabatan dalam menjalankan tugas fungsional dari Pemegang Saham yang berbentuk badan hukum pada kelompok usaha Bank; dan
   d. Anggota Direksi dilarang memangku jabatan rangkap, apabila jabatan rangkap tersebut bertentangan dengan peraturan perundang-undangan dan/atau apabila jabatan rangkap tersebut mungkin dapat menimbulkan benturan kepentingan.

1. Formal Requirements
   a. Capable in performing legal actions;
   b. Within 5 (five) years before appointment and during the term of office:
      1) Never been declared bankrupt;
      2) Never become a member of Board of Commissioners and/or Board of Directors who is found guilty of causing a bank to be declared bankrupt;
      3) Never been punished for committing a criminal act that is detrimental to state finances and/or related to the financial sector; and
      4) Never been a member of Board of Commissioners and/or Board of Directors who during the term of office:
         - Has ever not convening an Annual GMS;
         - Has ever had his/her accountability as the member of Board of Commissioners and/or Board of Directors rejected by the GMS or has ever been absent in giving his/her accountability as the member of Board of Commissioners and/or Board of Directors to the GMS; and
         - Has ever caused a Bank that obtains permit, approval, or registration from the Financial Services Authority not to fulfill its obligation to submit its Annual Report and/or Financial Statements to the Financial Services Authority.
2. Material Requirements
   a. Have good character, morals, and integrity;
   b. Has a commitment to comply with the laws and regulations; and
   c. Has knowledge and/or expertise in the field required to perform the duties.
3. Other Requirements
   a. Members of the Board of Commissioners are not allowed to concurrently hold position as a member of Board of Directors, member of Board of Commissioners, or Executive Officer in other financial institutions (bank or non-bank) and in more than 1 (one) non-financial institutions, either in Indonesia or overseas;
   b. Members of the Board of Commissioners do not hold concurrent position if holding a position as the Board of Directors, members of Board of Commissioners, or Executive Officer performing the supervision function in 1 (one) of the Bank's subsidiary controlled by the Bank (consolidated);
   c. Non-independent Commissioner does not hold a concurrent position in performing its functional duty from a legal entity Shareholder in the Banking business group; and
   d. The member of Board of Directors are not allowed to hold concurrent positions if they are contrary to the laws and regulations and/or if they possibly lead to the conflict of interest.

Kebijakan Remunerasi Dewan Komisaris dan Direksi

Remunerasi diberikan kepada Dewan Komisaris dan Direksi sebagai bentuk penghargaan atas pelaksanaan tugas dan tanggung jawab yang telah dilaksanakan dengan baik selama tahun buku. Sesuai dengan ketentuan Peraturan Otoritas Jasa Keuangan No. 45/POJK.03/2015 dan Surat Edaran Otoritas Jasa Keuangan No. 40/SEOJK.03/2016 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum, Bank Victoria telah mengimplementasikan kebijakan remunerasi yang sesuai dengan Keputusan Dewan Komisaris No. 001/SK-KOM/09/18 tanggal 20 September 2018 tentang Pedoman Komite Nominasi dan Remunerasi PT Bank Victoria International Tbk.

Prosedur Penetapan Remunerasi Dewan Komisaris dan Direksi

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

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

Jenis dan Indikator Penetapan Remunerasi Dewan Komisaris dan Direksi

Indikator penetapan remunerasi Dewan Komisaris dan Direksi Bank mempertimbangkan skala usaha, kompleksitas usaha, *peer group,* tingkat inflasi, kondisi dan kemampuan keuangan Bank, dan tidak bertentangan dengan peraturan perundang-undangan yang berlaku. Sementara penerapan remunerasi yang bersifat variabel secara khusus mendorong *prudent risk taking* serta memperhatikan risiko yang paling berpengaruh dalam kegiatan usaha (risiko utama).

Berdasarkan peraturan dan kebijakan terkait, remunerasi Dewan Komisaris dan Direksi terdiri dari:

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

Remuneration Policy of the Board of Commissioners and Board of Directors

Remuneration is given to the Board of Commissioners and Board of Directors as a form of appreciation for performing their duties and responsibilities properly in the fiscal year. Pursuant to the Financial Services Authority Regulation No. 45/POJK.03/2015 and Financial Services Authority Circular No. 40/SEOJK.03/2016 on Implementation of Governance in Providing Remuneration for Commercial Banks, Bank Victoria has implemented remuneration policy in accordance with Board of Commissioners' Decision Letter No. 001/SK-KOM/09/18 dated 20 September 2018 on Guidelines of Nomination and Remuneration Committee of PT Bank Victoria International Tbk.

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

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

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

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

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

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

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

Pelaksanaan Kaji Ulang dan Independensi Penerapan Kebijakan Remunerasi

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

Penetapan *Material Risk Takers*

Penentuan *Material Risk Taker* (MRT) dikategorikan sebagai berikut:

1. MRT dapat ditentukan dengan menggunakan metode kualitatif sesuai dengan porsi tanggung jawab yang berpengaruh terhadap profil risiko utama yang akan ditentukan berdasarkan evaluasi profil risiko yang ditentukan Bank setiap tahunnya; dan
2. Penentuan kategori MRT juga dapat dilakukan secara kuantitatif melalui perbandingan pemberian remunerasi bersifat variabel antara MRT dan karyawan non-MRT dengan pertimbangan terhadap kinerja dan juga tingkat risiko jabatan yang bersangkutan.

Dengan demikian, maka Dewan Komisaris, Direksi, dan/atau karyawan yang memperoleh remunerasi yang bersifat variabel dengan nilai yang besar dikategorikan sebagai MRT.

Penangguhan atau Penarikan Kembali Remunerasi

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

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

Kaitan Remunerasi dengan Risiko dan Kinerja

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

Review and Independence of Remuneration Policy Implementation

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

Establishing Material Risk Takers

Material Risk Taker (MRT) is categorized as follows:

1. MRT can be determined by using qualitative method according to the portion of responsibility that affects main risk profile which will be determined based on risk profile evaluation, as determined by the Bank annually; and
2. MRT category can also be determined quantitatively through comparison of variable remuneration provision between MRT and non-MRT employees, by considering their performance and positional risk.

Therefore, the Board of Commissioners, Board of Directors, and/or employees receiving a high amount variable remuneration are categorized as the MRT.

Remuneration Suspension or Clawback

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

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

Connection of Remuneration with Risk and Performance

The determination of variable remuneration for the Board of Commissioners and Board of Directors is adjusted to the main risks faced by the Bank, based on the criteria and risk impacts. If the main risk occurs, the remuneration for the Board of Commissioners and Board of Directors as the MRT will be affected. In addition,

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

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

Konsultan terkait Kebijakan Remunerasi

Dalam merumuskan kebijakan remunerasi, Bank tidak menggunakan jasa konsultan.

Consultant regarding Remuneration Policy

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

Struktur dan Besaran Remunerasi Dewan Komisaris dan Direksi

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

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

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

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

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

Remunerasi Dewan Komisaris dan Direksi berdasarkan Jenis
Remuneration for the Board of Commissioners and Board of Directors by Type

Jenis Remunerasi Type of Remuneration	Dewan Komisaris Board of Commissioners		Direksi Board of Directors	
	Orang People	Jumlah Total (Rp)	Orang People	Jumlah Total (Rp)
Remunerasi Bersifat Tetap (Gaji dan THR) Fixed Remuneration (Salary and THR Allowance)	2	2,482,700,000	5	12,454,017,200
Remunerasi Bersifat Variabel (Bonus) Variable Remuneration (Bonus)	2	792,954,993	5	4,502,746,513
Total	**3,275,654,993**		**16,956,763,713**	

Remunerasi Dewan Komisaris dan Direksi berdasarkan Bentuk
Remuneration for the Board of Commissioners and Board of Directors by Form

Bentuk Remunerasi Form of Remuneration	Dewan Komisaris Board of Commissioners		Direksi Board of Directors	
	Orang People	Jumlah Total (Rp)	Orang People	Jumlah Total (Rp)
Remunerasi dalam Bentuk Tunai Remuneration in the form of Cash	2	3,275,654,993	5	16,956,763,713
Remunerasi dalam Bentuk Natura Remuneration in the form of Natura	-	-	-	-

Bentuk Remunerasi Form of Remuneration	Dewan Komisaris Board of Commissioners		Direksi Board of Directors	
	Orang People	Jumlah Total (Rp)	Orang People	Jumlah Total (Rp)
Remunerasi dalam Bentuk Saham Remuneration in the form of Shares	-	-	-	-
Total	**3,275,654,993**		**16,956,763,713**	

Kelompok Remunerasi Dewan Komisaris dan Direksi
Remuneration Group of the Board of Commissioners and Board of Directors

Jumlah Remunerasi dalam Setahun Total Remuneration in a Year	Jumlah Dewan Komisaris Total Board of Commissioners (Orang/People)	Jumlah Direksi Total Board of Directors (Orang/People)
Di atas Rp2 miliar Above Rp2 billion	-	2
Di atas Rp1 miliar - Rp2 miliar Above Rp1 billion - Rp2 billion	-	2
Di atas Rp500 juta - Rp1 miliar Above Rp500 million - Rp1 billion	2	1
Di bawah Rp500 juta Below Rp500 million	1	-

Remunerasi yang Ditangguhkan atau Ditarik Kembali

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

Suspended or Clawback Remuneration

In 2023, there was no suspended or clawback remuneration of the Board of Commissioners and Board of Directors.

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

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

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

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

Rasio Gaji Tertinggi dan Terendah

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

Ratio of Highest and Lowest Salary

Bank Victoria consistently pays attention to the conformity of salary ratio between the Board of Commissioners, Board of Directors, and all employees, by considering the level of duties and responsibilities. Information on Bank Victoria's salary ratio for 2023 is as follows:

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

Komite di bawah Dewan Komisaris
Board of Commissioners' Subordinate Committees

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

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

Komite Pemantau Risiko

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

Risk Monitoring Committee

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

Pedoman Komite Pemantau Risiko

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

Risk Monitoring Committee Charter

The implementation of the Risk Monitoring Committee's duties refers to the Risk Monitoring Committee Charter which were updated through Board of Commissioners' Decision No. 002/SK-KOM/12/23 dated 6 December 2023 on the Charter and Work Guidelines of the Risk Monitoring Committee of PT Bank Victoria International Tbk.

Tugas dan Tanggung Jawab Komite Pemantau Risiko

Tugas dan tanggung jawab Komite Pemantau Risiko sebagai berikut:

1. Melakukan pengkajian ulang dan memberikan rekomendasi atas efektivitas pelaksanaan manajemen risiko Bank melalui pertemuan secara berkala maupun cara lainnya untuk membahas progres dari tahapan-tahapan tugas dan tanggung jawab yang dilakukan oleh Satuan Kerja Manajemen Risiko;
2. Melakukan pengawasan atas kegiatan Satuan Kerja Manajemen Risiko dalam memantau pelaksanaan mitigasi risiko oleh Unit-Unit Kerja terkait;
3. Melakukan pengawasan atas pelaksanaan rekomendasi Komite oleh Satuan Kerja Manajemen Risiko;
4. Melakukan analisis dan evaluasi atas usulan Rencana Kegiatan dan Anggaran Bank serta pengkajian ulang tahunan atas rencana jangka panjang Bank yang diajukan oleh Direksi; dan
5. Melakukan penelaahan atas informasi risiko dan manajemen risiko Bank dalam laporan-laporan yang akan dipublikasikan.

Duties and Responsibilities of the Risk Monitoring Committee

Duties and responsibilities of the Risk Monitoring Committee are as follows:

1. Reviewing and providing recommendations on the effectiveness of the Bank's risk management implementation through regular meetings or other methods to discuss the progress of duties and responsibilities carried out by the Risk Management Work Unit;
2. Overseeing activities of the Risk Management Work Unit in monitoring the implementation of risk mitigation by related Work Units;
3. Overseeing the implementation of the Committee's recommendations by the Risk Management Work Unit;
4. Performing analysis and evaluation of Bank Activity and Budget Plan proposal, as well as annual review of the Bank's Long-Term Plan submitted by the Board of Directors; and
5. Reviewing the Bank's risk information and Bank risk management in reports to be published.

Komposisi dan Masa Jabatan Komite Pemantau Risiko

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

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

Composition and Term of Office of the Risk Monitoring Committee

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

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

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

Profil Komite Pemantau Risiko
Risk Monitoring Committee's Profile

GUNAWAN TENGGARAHARDJA

Ketua
Chairperson

ZAENAL ABIDIN, Ph.D

Anggota
Member

Dasar Hukum Penunjukkan dan Periode Menjabat Dasar Pengangkatan
Basis of Appointment and Term of Office
Keputusan Direksi No. 002B/SK-DIR/11/22 tanggal 9 November 2022 (2022-Sekarang).
Board of Directors' Decision No. 002B/SK-DIR/11/22 dated 9 November 2022 (2022-Now).

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

MEDI SEJATI

Anggota
Member

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Jakarta

Usia
Age
58 tahun / years old

Domisili
Domicile
Jakarta

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

Riwayat Pendidikan
Diplomas Manajemen Perbankan dari Sekolah Tinggi Ilmu Ekonomi AKPI Bandung (1990).

Rangkap Jabatan
Di dalam Bank Victoria:
- Anggota Komite Audit Bank Victoria (sejak 2021);
- Anggota Komite Audit Bank Victoria Syariah (sejak 2021); dan
- Anggota Komite Pemantau Risiko Bank Victoria Syariah (sejak 2021).

Di luar Bank Victoria:
Tidak ada.

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

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

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

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

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

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

Outside of Bank Victoria:
None.

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

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

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

YOZEF ABDULRACHMAN

Anggota
Member

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Tasikmalaya

Usia
Age
66 tahun / years old

Domisili
Domicile
Tangerang

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

Riwayat Pendidikan
Sarjana Matematika dari Universitas Padjadjaran (1983).

Rangkap Jabatan
Di dalam Bank Victoria:
- Anggota Komite Audit (sejak 2019).

Di luar Bank Victoria:
- Konsultan dan *Trainer*/Fasilitator bidang Manajemen Risiko (sejak 2010); dan
- *Trainer* dan Fasilitator Pembekalan Sertifikasi Manajemen Risiko dan *Surveilance/Refreshment* Manajemen Risiko (sejak 2010);

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

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

Education
Bachelor of Mathematics from Padjajaran University (1983).

Concurrent Positions
In Bank Victoria:
- Member of Audit Committee (since 2019).

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

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

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

Hubungan Afiliasi

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

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

Affiliation Relationship

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

Independensi Komite Pemantau Risiko

Komite Pemantau Risiko Bank telah memenuhi aspek independensi berikut:

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

Rapat Komite Pemantau Risiko

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

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

Independency of Risk Monitoring Committee

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

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

Risk Monitoring Committee's Meetingting

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

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

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

Agenda Rapat Komite Pemantau Risiko

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

Laporan Singkat Pelaksanaan Kegiatan Komite Pemantau Risiko Tahun 2023

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

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

Pelatihan dan/atau Peningkatan Komite Pemantau Risiko

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

Meeting Agenda Risk Management Activities

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

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

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

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

Risk Monitoring Committee's Training and/or Development Programs

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

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

Nama dan Jabatan Name and Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers	
Medi Sejati Anggota Member	1. Komite Audit (oleh Ikatan Komite Audit Indonesia); 2. Audit Internal (oleh Ikatan Komite Audit Indonesia); 3. Pengawasan terhadap Pengendalian Internal (oleh Ikatan Komite Audit Indonesia); 4. Pengawasan terhadap Audit Eksternal (oleh Ikatan Komite Audit Indonesia); 5. GCG dan *Compliance* (oleh Ikatan Komite Audit Indonesia); 6. Pengawasan Informasi Keuangan (oleh Ikatan Komite Audit Indonesia); dan 7. Manajemen Risiko (oleh Ikatan Komite Audit Indonesia).	1. Audit Committee (by Indonesian Institute of Audit Committee); 2. Internal Audit (by Indonesian Institute of Audit Committee); 3. Internal Control Supervision (by Indonesian Institute of Audit Committee); 4. External Audit Supervision (by Indonesian Institute of Audit Committee); 5. GCG and Compliance (by Indonesian Institute of Audit Committee); 6. Financial Information Supervision (by Indonesian Institute of Audit Committee); and 7. Risk Management (by Indonesian Institute of Audit Committee).
Yozef Abdulrachman Anggota Member	1. Menyusun Program Pelatihan Kerja (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 2. Merencanakan Penyajian Materi Pelatihan Kerja (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 3. Merencanakan Evaluasi Hasil Pembelajaran (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 4. Melaksanakan Pelatihan Tatap Muka (*Face to Face*) (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 5. Menerapkan Kesehatan dan Keselamatan Kerja (K3) di Lembaga Pelatihan Kerja (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 6. Mengelola Pemenuhan Persyaratan Bahasa, Literasi, dan Berhitung dalam Proses Pembelajaran (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 7. Menilai Kemajuan Kompetensi Peserta Pelatihan secara Individu (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 8. Menentukan Kebutuhan Pelatihan Individu (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 9. Merancang Strategi Pembelajaran (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 10. Mengelola Bahan Pelatihan Kerja (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 11. Mengelola Peralatan Pelatihan Kerja (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 12. Menyiapkan Pelaksanaan Pelatihan/Asesmen Berbasis Kompetensi (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); 13. Melaksanakan Pelatihan Berbasis Kompetensi (PBK) (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia); dan 14. Melakukan Asesmen Berbasis Kompetensi (oleh Lembaga Sertifikasi Profesi – Instruktur Kompeten Indonesia).	1. Preparing Job Training Program (by Profession Certification Institute-Indonesia Competent Instructor); 2. Planning the Presentation of Job Training Material (Profession Certification Institute-Indonesia Competent Instructor); 3. Planning the Learning Outcomes Evaluation (by Profession Certification Institute-Indonesia Competent Instructor); 4. Conducting a Face to Face Training (by Profession Certification Institute-Indonesia Competent Instructor); 5. Implementing Occupational Health and Safety (OHS) in Job Training Institution (by Profession Certification Institute-Indonesia Competent Instructor); 6. Managing the Language, Literacy, and Numeracy Requirements in Learning Process (by Profession Certification Institute-Indonesia Competent Instructor); 7. Individually Assessing Competency Progress of Training Participants (by Profession Certification Institute-Indonesia Competent Instructor); 8. Determining Individual Needs of Training Participants (by Profession Certification Institute-Indonesia Competent Instructor); 9. Designing Learning Strategies (by Profession Certification Institute-Indonesia Competent Instructor); 10. Managing Job Training Materials (by Profession Certification Institute-Indonesia Competent Instructor); 11. Managing Job Training Equipment (by Profession Certification Institute-Indonesia Competent Instructor); 12. Preparing the Competency-Based Training/Assessment (by Profession Certification Institute-Indonesia Competent Instructor); 13. Conducting the Competency-Based Training (CBT) (by Profession Certification Institute-Indonesia Competent Instructor); and 14. Conducting the Competency-Based Assessment (by Profession Certification Institute

Komite Nominasi dan Remunerasi

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

Nomination and Remuneration Committee

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

Pedoman Komite Nominasi dan Remunerasi

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

Tugas dan Tanggung Jawab Komite Nominasi dan Remunerasi

Tugas dan tanggung jawab Komite Nominasi dan Remunerasi sebagai berikut:

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

Nomination and Remuneration Committee Charter

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

Duties and Responsibilities of Nomination and Remuneration Committee

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

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

Komposisi dan Masa Jabatan Komite Nominasi dan Remunerasi

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

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

Composition and Term of Office of the Nomination and Remuneration Committee

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

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

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

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

GUNAWAN TENGGARAHARDJA

Ketua
Chairperson

SIA LENG HO

Anggota
Member

Dasar Hukum Penunjukkan dan Periode Menjabat Dasar Pengangkatan
Basis of Appointment and Term of Office
Keputusan Direksi No. 002C/DIR-EKS/11/22 tanggal 9 November 2022 (2022-Sekarang).
Board of Directors' Decision No. 002C/DIR-EKS/11/22 dated 9 November 2022 (2022-Now).

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

SYAHDA CANDRA

Anggota
Member

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Jakarta

Usia
Age
50 tahun / years old

Domisili
Domicile
Jakarta

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

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

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

Di luar Bank Victoria:
Tidak ada.

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

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

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

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

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

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

Outside of Bank Victoria:
None.

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

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

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

Independensi Komite Nominasi dan Remunerasi

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

Rapat Komite Nominasi dan Remunerasi

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

Independency of Nomination and Remuneration Committee

The Bank's Nomination and Remuneration Committee has fulfilled the following independency aspects:
1. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders;
2. Does not have share ownership relationship in the Bank, either directly or indirectly;
3. Does not have management relationship in the Bank, Subsidiary, and affiliated company;
4. Does not have family relationship with the Board of Commissioners, Board of Directors, Main and Controlling Shareholders, and/or among members of Nomination and Remuneration Committee; and
5. Does not hold position as administrator of political party, state, and government.

Nomination and Remuneration Committee's Meeting

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

dalam rapat selama tahun 2023 ditunjukkan sebagai berikut:

at meetings throughout 2023 is shown as follows:

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

Agenda Rapat Komite Nominasi dan Remunerasi

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

Laporan Singkat Pelaksanaan Kegiatan Komite Nominasi dan Remunerasi Tahun 2023

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

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

Pelatihan dan/atau Peningkatan Komite Nominasi dan Remunerasi

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

Nomination and Remuneration Committee's Meeting Agenda

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

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

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

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

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

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

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

Nama dan Jabatan Name and Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers	
Syahda Candra Anggota Member	1. *Outlook* Industri Jasa Keuangan di Tahun 2023 (oleh Otoritas Jasa Keuangan Institute); 2. Tren Perbankan di Tahun 2023 (oleh Otoritas Jasa Keuangan Institute); 3. *Team Building* dan *Outbond*: *Together We Growth* (oleh Otoritas Jasa Keuangan Institute); 4. *Philosophy that Flows in My Soul* (oleh Bank Victoria); 5. *Governance, Risk, and Compliance* (oleh Bank Victoria); 6. *Lesson Learned* Kasus Silicon Valley Bank (oleh Lembaga Pengembangan Perbankan Indonesia); 7. ISO 27001 - Sistem Manajemen Keamanan Informasi (oleh Veda Praxis); 8. *Refreshment* Sertifikasi Manajemen Risiko: *Risk in Digital World* (oleh PT Efektifpro Knowledge Source); 9. *Expert Sharing Outlook Banking Regulation* (oleh Lembaga Pengembangan Perbankan Indonesia); 10. Aspek Hukum dan Dokumen Pembukaan Rekening Perusahaan (oleh Bank Victoria); 11. *Anti Fraud Management for Leaders Batch 2* (oleh PT Kanatta Daya Indonesia); 12. *Refreshment* Pencegahan Tindak Pidana Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal berdasarkan Peraturan Otoritas Jasa Keuangan No. 8 Tahun 2023 (oleh PT Andara Sarana); 13. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute); 14. *Mastering Yourself*: Optimalkan Potensi dan Tingkatkan Kinerja di Era *Digital Confirmation* (oleh Otoritas Jasa Keuangan Institute); dan 15. *OJK's Year-End Knowledge Sharing Session* (oleh Otoritas Jasa Keuangan Institute).	1. 2023 Financial Services Industry (by Otoritas Jasa Keuangan Institute); 2. 2023 Banking Trends (by Otoritas Jasa Keuangan Institute); 3. Team Building dan Outbond: Together We Growth (by Otoritas Jasa Keuangan Institute); 4. Philosophy that Flows in My Soul (by Bank Victoria); 5. Governance, Risk, and Compliance (by Bank Victoria); 6. Lesson Learned from the Case of Silicon Valley Bank (by Indonesian Banking Development Institution); 7. ISO 27001 – Information Security Management System (by Veda Praxis); 8. Risk Management Certification Refreshment: Risk in Digital World (by PT Efektifpro Knowledge Source); 9. Expert Sharing Outlook Banking Regulation (by Indonesian Banking Development Institution); 10. Legal Aspect and Documents for Opening a Corporate Account (by Bank Victoria); 11. Anti-Fraud Management for Leaders Batch 2 (by PT Kanatta Daya Indonesia); 12. Refreshment on Prevention of Criminal Acts of Anti Money Laundering, Counter Terrorism Financing, and Prevention of Funding for Proliferation of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana); 13. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute); 14. Mastering Yourself: Optimizing Potentials and Improving Performances in the Digital Confirmation Era (by Otoritas Jasa Keuangan Institute); and 15. OJK's Year-End Knowledge Sharing Session (by Otoritas Jasa Keuangan Institute).

Komite Audit

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

Pedoman Komite Audit

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

Tugas dan Tanggung Jawab Komite Audit

Tugas dan tanggung jawab Komite Audit sebagai berikut:

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

Audit Committee

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

Audit Committee Charter

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

Duties and Responsibilities of Audit Committee

Duties and responsibilities of the Audit Committee are as follows:

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

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

Komposisi dan Masa Jabatan Komite Audit

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

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

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

Composition and Term of Office of the Audit Committee

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

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

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

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

Profil Komite Audit

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

Independensi Komite Audit

Komite Audit Bank telah memenuhi aspek independensi berikut:

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

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

Audit Committee's Profile

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

Independency of the Audit Committee

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

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

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

Rapat Komite Audit

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

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

Audit Committee's Meeting

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

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

Agenda Rapat Komite Audit

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

Audit Committee's Meeting Agenda

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

Laporan Singkat Pelaksanaan Kegiatan Komite Audit Tahun 2023

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

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

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

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

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

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

Pelatihan dan/atau Peningkatan Komite Audit

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

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

Audit Committee's Training and/or Development Programs

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

Organ Pendukung Dewan Komisaris
Board of Commissioners Supporting Organ

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

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

Sekretaris Dewan Komisaris

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

Tugas dan Tanggung Jawab Sekretaris Dewan Komisaris

Tugas dan tanggung jawab Sekretaris Dewan Komisaris sebagai berikut:

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

Secretary of the Board of Commissioners

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

Duties and Responsibilities of Board of Commissioners' Secretary

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

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

Komite di bawah Direksi
Board of Directors' Subordinate Committees

Komite Manajemen Risiko

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

Pedoman Komite Manajemen Risiko

Pelaksanaan tugas Komite Manajemen Risiko mengacu pada Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tanggal 22 Maret 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016 tanggal 1 September 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola bagi Bank Umum, dan Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum.

Pernyataan Independensi Komite Manajemen Risiko

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

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Manajemen Risiko

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

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

Risk Management Committee

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

Risk Management Committee Charter

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

Statement of Independence of Risk Management Committee

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

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

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

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

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

Struktur dan Keanggotaan Komite Manajemen Risiko

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

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

Rapat Komite Manajemen Risiko

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

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

Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

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

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

Structure and Composition of Risk Management Committee

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

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

Risk Management Committee's Meeting

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

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

Integrated Risk Management Committee in the Financial Group

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

Pedoman Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

Berdasarkan Surat Otoritas Jasa Keuangan No. S-66/PB.33/2021 tanggal 23 Juni 2021 tentang Perubahan Status Konglomerasi Keuangan Grup Victoria menjadi Grup Keuangan Victoria, di mana Bank ditunjuk sebagai Entitas Koordinator. Pelaksanaan tugas dan tanggung jawab Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan tidak bertentangan dengan ketentuan Peraturan Otoritas Jasa Keuangan sepanjang dinyatakan tetap berlakunya Peraturan Otoritas Jasa Keuangan No. 17/POJK.03/2014 tanggal 18 November 2014 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan, Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2014 tanggal 18 November 2014 tentang Penerapan Tata Kelola Terintegrasi bagi Konglomerasi Keuangan, dan Peraturan Otoritas Jasa Keuangan No. 26/POJK.03/2015 tanggal 11 Desember 2015 tentang Kewajiban Penyediaan Modal Minimum Terintegrasi bagi Konglomerasi Keuangan.

Pernyataan Independensi Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

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

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

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

1. Mengembangkan penerapan budaya risiko secara terintegrasi sebagai bagian dari penerapan manajemen risiko terintegrasi Grup Keuangan Victoria;
2. Melaksanakan kebijakan manajemen risiko secara terintegrasi dalam Grup Keuangan Victoria yang telah ditetapkan;
3. Memberikan rekomendasi serta perbaikan atau penyempurnaan dalam hal penyusunan kebijakan manajemen risiko secara terintegrasi dalam Grup Keuangan Victoria;
4. Mengarahkan, menyetujui, memantau, mengevaluasi, dan menyesuaikan kebijakan dan/atau pedoman umum penerapan manajemen risiko terintegrasi dalam Grup Keuangan Victoria sesuai dengan ukuran dan kompleksitas usaha anggota Grup Keuangan Victoria; dan
5. Mengevaluasi arah, strategi, dan program manajemen risiko terintegrasi dalam Grup Keuangan Victoria.

Struktur dan Keanggotaan Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

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

Guidelines of Integrated Risk Management Committee in the Financial Group

Based on the Financial Services Authority Circular No. S-66/PB.33/2021 dated 23 June 2021 on Changes in Status of Victoria Group Financial Conglomeration to Victoria Financial Group, in which the Bank is appointed as the Coordinating Entity. The implementation of duties and responsibilities of the Integrated Risk Management Committee in Financial Group does not conflict with the provisions of Financial Services Authority Regulation as long as it states the enforcement of Financial Services Authority Regulation No. 17/POJK.03/2014 dated 18 November 2014 on Implementation of Integrated Risk Management for Financial Conglomeration, Financial Services Authority Regulation No. 18/POJK.03/2014 dated 18 November 2014 on Implementation of Integrated Governance for Financial Conglomeration, and Financial Services Authority Regulation No. 26/POJK.03/2015 dated 11 December 2015 on the Integrated Capital Adequacy Ratio for Financial Conglomeration.

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

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

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

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

1. Developing risk culture in an integrated manner as part of integrated risk management implementation in Victoria Financial Group;
2. Implementing risk management policies in an integrated manner within the established Victoria Financial Group;
3. Providing recommendations for improvements or refinements in formulating integrated risk management policies within Victoria Financial Group;
4. Directing, approving, monitoring, evaluating, and adjusting the policies and/or general guidelines on integrated risk management implementation in Victoria Financial Group in accordance with the business size and complexity of Victoria Financial Group members; and
5. Evaluating the directions, strategies, and integrated risk management program of Victoria Financial Group.

Structure and Composition of Integrated Risk Management Committee in the Financial Group

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

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

Rapat Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan

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

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

Assets and Liability Committee

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

Pedoman ALCO

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

Pernyataan Independensi ALCO

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

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

Integrated Risk Management Committee's Meeting in Financial Group

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

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

Assets and Liability Committee

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

ALCO Charter

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

Statement of Independence of ALCO

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

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas ALCO

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

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

Struktur dan Keanggotaan ALCO

Berdasarkan Surat Keputusan Direksi No. 009/SK-DIR/03/2019 tentang Susunan Keanggotaan *Assets and Liabilities Committee* (ALCO) PT Bank Victoria International Tbk, komposisi keanggotaan ALCO, yaitu:

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

Rapat ALCO

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

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

Komite Kredit

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

Duties, Responsibilities, and the Realization of ALCO Duties

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

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

Structure and Composition of ALCO

Based on the Board of Directors' Decision Letter No. 009/SK-DIR/03/2019 on the Composition of Assets and Liabilities Committee (ALCO) of PT Bank Victoria International Tbk, ALCO's composition is as follows:

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

ALCO's Meeting

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

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

Credit Committee

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

Pedoman Komite Kredit

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

Credit Committee Charter

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

Pernyataan Independensi Komite Kredit

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

Statement of Independence of Credit Committee

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

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Kredit

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

Duties, Responsibilities, and the Realization of Credit Committee Duties

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

Struktur dan Keanggotaan Komite Kredit

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

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

Structure and Composition of Credit Committee

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

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

Rapat Komite Kredit

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

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

Credit Committee Meeting

Policy and implementation of Credit Committee meeting are regulated in the Credit Committee Charter. The Credit Committee holds an internal meeting or circular meeting at least 1 (once) a week or at any time as necessary. Decision made by the Credit Committee member must be quorum and unanimous. In the event of any dispute between the members of the deciding Credit Committee, then the credit will be deemed unapproved.

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

Komite Kebijakan Perkreditan

Credit Policy Committee

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

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

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

Pedoman Komite Kebijakan Perkreditan

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

Pernyataan Independensi Komite Kebijakan Perkreditan

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

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Kebijakan Perkreditan

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

1. Memberikan masukkan kepada Direksi dalam rangka penyusunan kebijakan perkreditan Bank, terutama yang berkaitan dengan perumusan prinsip kehati-hatian dalam perkreditan Bank;
2. Mengawasi agar kebijakan perkreditan Bank dapat diterapkan dan dilaksanakan secara konsekuen dan konsisten, serta merumuskan pemecahan apabila terdapat hambatan/ kendala dalam penerapan kebijakan perkreditan Bank;
3. Melakukan kajian terhadap kebijakan perkreditan Bank dan memberikan saran kepada Direksi apabila diperlukan perubahan kebijakan perkreditan Bank; dan
4. Memantau dan mengevaluasi perkembangan serta kualitas portofolio perkreditan, kewenangan pelaksanaan keputusan kredit, proses pemberian kredit kepada pihak terkait dan debitur-debitur besar, pelaksanaan ketentuan batas maksimum pemberian kredit, ketaatan terhadap perundang-undangan, penyelesaian kredit bermasalah sesuai kebijakan perkreditan Bank, dan upaya Bank memastikan kecukupan penyisihan penghapusan kredit.

Struktur dan Keanggotaan Komite Kebijakan Perkreditan

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

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

Credit Policy Committee Charter

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

Statement of Independence of Credit Policy Committee

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

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

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

1. To provide input to the Board of Directors in the framework of the Bank's credit policy making, especially with regard to formulation of prudential principles in the Bank's credit;
2. To supervise so that the Bank's credit policy can be implemented and executed consistently with consequence, and to formulate solutions if there are obstacles/hindrance in implementing the Bank's credit policy;
3. To review the Bank's credit policies and advise the Board of Directors if changes to the Bank's credit policy are necessary; and
4. To monitor and evaluate the development and quality of the credit portfolio, the authority to implement credit decision, the credit distribution process to related parties and major debtors, the implementation of the provisions on the maximum credit limit, adherence to regulations, settlement of non-performing loans in accordance with the Bank's credit policy, and the Bank's efforts to ensure the adequacy of the allowance for credit writeoff.

Structure and Composition of Credit Policy Committee

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

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

Rapat Komite Kebijakan Perkreditan

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

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

Komite Teknologi Informasi

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

Pedoman Komite Teknologi Informasi

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

Pernyataan Independensi Komite Teknologi Informasi

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

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

Credit Policy Committee's Meeting

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

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

Information Technology Committee

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

Information Technoloy Committee Charter

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

Statement of Independence of Information Technology Committee

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

Duties, Responsibilities, and the Realization of

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Teknologi Informasi

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

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

Struktur dan Keanggotaan Komite Teknologi Informasi

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

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

Information Technology Committee Duties

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

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

Structure and Composition of Information Technology Committee

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

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

Rapat Komite Teknologi Informasi

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

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

Information Technology Committee's Meeting

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

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

Komite Pemantau dan Pelaksanaan GCG

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

Pedoman Komite Pemantau dan Pelaksanaan GCG

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

Pernyataan Independensi Komite Pemantau dan Pelaksanaan GCG

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

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

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

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

GCG Implementation and Monitoring Committee

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

GCG Implementation and Monitoring Committee Charter

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

Statement of Independence of GCG Implementation and Monitoring Committee

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

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

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

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

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

Struktur dan Keanggotaan Komite Pemantau dan Pelaksanaan GCG

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

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

Rapat Komite Pemantau dan Pelaksanaan GCG

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

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

Komite Personalia

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

Pedoman Komite Personalia

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

Pernyataan Independensi Komite Personalia

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

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

Structure and Composition of GCG Implementation and Monitoring Committee

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

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

GCG Implementation and Monitoring Committee's Meeting

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

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

Personnel Committee

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

Personnel Committee Charter

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

Statement of Independence of Personnel Committee

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

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Personalia

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

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

Struktur dan Keanggotaan Komite Personalia

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

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

Rapat Komite Personalia

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

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

Komite Pengadaan

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

Pedoman Komite Pengadaan

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

Duties, Responsibilities, and the Realization of Personnel Committee Duties

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

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

Structure and Composition of Personnel Committee

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

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

Personnel Committe's Meeting

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

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

Procurement Committee

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

Procurement Committee Charter

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

Pernyataan Independensi Komite Pengadaan

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

Tugas dan Tanggung Jawab Komite Pengadaan

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

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

Struktur dan Keanggotaan Komite Pengadaan

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

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

Rapat Komite Pengadaan

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

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

Statement of Independence of Procurement Committee

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

Duties and Responsibilities of Procurement Committee

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

1. Asking for information on necessary matters related to the procurement of goods and services from various parties, both internal and external;
2. Providing approval on the procurement of goods and services;
3. Applying for approval to the Board of Commissioners on procurement of goods and services with minimum value/price as regulated in the Company's Articles of Association; and
4. Providing inputs to the Board of Directors regarding important and relevant matters in the formulation of procurement policies of goods and services.

Structure and Composition of Procurement Committee

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

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

Procurement Committee's Meeting

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

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

Komite Produk

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

Pedoman Komite Produk

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

Pernyataan Independensi Komite Produk

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

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Produk

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

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

Struktur dan Keanggotaan Komite Produk

Kedudukan Komite Produk dalam struktur organisasi berada di bawah Direksi dengan ketua komite diangkat dan diberhentikan oleh Direksi. Struktur dan keanggotaan Komite Produk berdasarkan Surat Keputusan Direksi No. 002A/SK-DIR/10/22 tanggal 20 Oktober 2022 tentang Komite Produk PT Bank Victoria International Tbk, diungkapkan sebagai berikut:

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

Product Committee

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

Product Committee Charter

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

Statement of Independence of Product Committee

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

Duties, Responsibilities, and the Realization of Product Committee Duties

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

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

Structure and Composition of Product Committee

Product Committee's position in the organizational structure is under the Board of Directors and the chairperson of committee is appointed and dismissed by the Board of Directors. The structure and composition of Product Committee based on Board of Directors' Decision Letter No. 002A/SK-DIR/10/22 dated 20 October 2022 on Product Committee of PT Bank Victoria International Tbk are disclosed below:

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

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

Rapat Komite Produk

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

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

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

Product Committee's Meeting

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

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

Organ Pendukung Direksi
Board of Directors' Supporting Organ

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

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

Corporate Secretary

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

Pedoman *Corporate Secretary*

Dasar pembentukan dan pedoman *Corporate Secretary* dalam melaksanakan tugasnya mengacu pada peraturan utama berikut:

1. Peraturan Otoritas Jasa Keuangan No. 35/POJK.04/2015 tentang Sekretaris Perusahaan Emiten atau Perusahaan Publik;

Corporate Secretary

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

Corporate Secretary Charter

The basis for the Corporate Secretary charter and establishment in performing its duties refers to the following main regulations:

1. Financial Services Authority Regulation No. 35/POJK.04/2015 on Corporate Secretary of Issuers or Public Companies;

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

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

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

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

2. Corporate Affair Policy and Procedure based on the Board of Directors' Decision No. 021/SK-DIR/07/14 dated 21 July 2014, which was updated as Standard Operating Procedure of Corporate Secretary based on Board of Directors' Decision Letter No. 003/SK-DIR/12/17 dated 13 December 2017; and
3. Standard Operating Procedure of General Meeting of Shareholders based on the Board of Directors' Decision No. 004/SK-DIR/04/17 dated 21 April 2017.

Duties, Responsibilities, and the Realization of Corporate Secretary Duties

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

1. To follow the capital market development, especially regulations applicable in capital market sector;
2. To provide services to the public for any information required by the investors in relation to the Bank's condition;
3. To provide input to the Bank's Board of Directors to comply with the provisions of Law No. 8 of 1995 on Capital Market and its implementing regulations; and
4. To be the liaison or contact person between the Bank and Financial Services Authority and public.

Profil Kepala Divisi *Corporate Secretary*

Profile of Head of Corporate Secretary Division

CAPRIE ARDIRA AZHAR

Kepala Divisi *Corporate Secretary*
Head of Corporate Secretary Division

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Jakarta

Usia
Age
36 tahun / years old

Domisili
Domicile
Jakarta

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

Riwayat Pendidikan
Sarjana Hukum dari Universitas Padjadjaran (2012).

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

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

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

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

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

Education
Bachelor of Law from Padjadjaran University (2012).

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

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

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

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

Pelatihan dan/atau Peningkatan *Corporate Secretary*

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

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

Corporate Secretary's Training and/or Improvement

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

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

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

Satuan Kerja Audit Internal *& Anti Fraud*

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

Pedoman SKAI *& Anti Fraud*

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

Tugas dan Tanggung Jawab SKAI *& Anti Fraud*

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

1. Membantu tugas Direktur Utama dan Dewan Komisaris dalam melakukan pengawasan dengan cara menjabarkan secara operasional baik perencanaan, pelaksanaan, maupun pemantauan hasil audit;
2. Menyusun dan melaksanakan perencanaan audit tahunan, antara lain analisis dan penilaian di bidang keuangan, akuntansi, operasional, perkreditan, dan kegiatan lain;
3. Mengidentifikasi segala kemungkinan untuk memperbaiki dan meningkatkan efisiensi penggunaan sumber daya dan dana;
4. Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkatan manajemen;
5. Memantau, menganalisis, dan melaporkan pelaksanaan tindak lanjut perbaikan yang telah disarankan;
6. Memberikan penilaian tingkat keyakinan kualitas pelaksanaan tugas atas proses manajemen risiko, sistem pengendalian internal dan tata kelola usaha telah dilaksanakan secara cukup dan efektif di seluruh Unit Kerja Bank Victoria;
7. Membuat laporan hasil audit dan menyampaikan laporan tersebut kepada Direktur Utama dan Dewan Komisaris;
8. Bekerja sama dengan Komite Audit dalam melakukan pengawasan dan memonitor pelaksanaan tindak lanjut perbaikan atas temuan SKAI;

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

Internal Audit Work Unit & Anti Fraud

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

SKAI & Anti Fraud Charter

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

Duties and Responsibilities of the SKAI & Anti Fraud

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

1. Assisting the President Director and Board of Commissioners in monitoring by detailing the operations of planning, implementation, or monitoring of the audit result;
2. Preparing and conducting the annual audit planning, among others, the analysis and assessment in the fields of finance, accounting, operations, credit, and other activities;
3. Identifying all possibilities to improve and enhance the efficient use of resources and funds;
4. Providing advice for improvement and objective information on activities audited at all management levels;
5. Monitoring, analyzing, and reporting the follow-up actions of the suggested corrective actions;
6. Assessing the confidence level of quality of duty implementation of the risk management process, internal control system, and business governance that has been implemented sufficiently and effectively in all Work Units of Bank Victoria;
7. Preparing the audit result report and submitting the report to the President Director and the Board of Commissioners;
8. Cooperating with the Audit Committee in supervising and monitoring the implementation of follow-up for improvements to SKAI findings;

9. Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkatan manajemen; dan
10. Melaksanakan fungsi Audit Internal Terintegrasi dalam rangka konglomerasi keuangan Grup Victoria.

Kedudukan dan Struktur SKAI *& Anti Fraud*

Kedudukan SKAI *& Anti Fraud* berada langsung di bawah Direktur Utama. SKAI *& Anti Fraud* bertindak independen dan bertanggung jawab secara langsung kepada Direktur Utama. Divisi ini memiliki jalur komunikasi langsung dengan Komite Audit dan Dewan Komisaris serta memiliki akses yang tidak terbatas terhadap seluruh aktivitas di Bank dan merupakan mitra manajemen dalam mewujudkan implementasi GCG. Kepala SKAI *& Anti Fraud* diangkat dan diberhentikan oleh Direktur Utama atas persetujuan Dewan Komisaris. Pengangkatan dan pemberhentian tersebut dilaporkan kepada regulator.

9. Providing recommendations for improvement and objective information on activities audited at all management levels; and
10. Performing the functions of Integrated Internal Audit in the framework of Victoria Group's financial conglomeration.

Position and Structure of SKAI & Anti Fraud

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

Profil Kepala Divisi SKAI *& Anti Fraud*

Profile of Head of SKAI & Anti Fraud Division

DJOKO SOENDJOJO

Kepala Divisi SKAI & *Anti Fraud*
Head of Corporate Secretary Division

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Surabaya

Usia
Age
55 tahun / years old

Domisili
Domicile
Jakarta

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

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

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

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

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

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

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

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

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

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

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

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

Komposisi dan Sertifikasi Profesi SKAI *& Anti Fraud*

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

Composition and Professional Certification of SKAI & Anti Fraud

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

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

Rapat SKAI *& Anti Fraud*

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

Agenda Rapat SKAI *& Anti Fraud*

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

Rencana dan Realisasi Pelaksanaan Kerja SKAI *& Anti Fraud*

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

SKAI & Anti Fraud's Meeting

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

Meeting Agenda for SKAI & Anti Fraud

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

Work Plan and Realization of SKAI & Anti Fraud

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

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

Temuan dan Tindak Lanjut Hasil Audit

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

Findings and Follow-Up on Audit Results

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

Pelatihan dan/atau Peningkatan SKAI *& Anti Fraud*

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

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

SKAI & Anti Fraud's Training and/or Improvement

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

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

24. *Compliance Risk for Financial Technology*, Lembaga Pengembangan Perbankan Indonesia dan Fintech Indonesia (oleh Asosiasi FinTech Indonesia);
25. Meningkatkan Efektivitas Sinergi Kerja Fungsi SKAI, Kepatuhan dan Risiko (oleh Equivalent Training Center);
26. Buka Puasa Bersama 2023 (oleh Bank Victoria);
27. *Anti Fraud Management for Leaders Batch 2* (oleh Kanatta Daya);
28. *Webinar Forensic Audit* (oleh Universitas Sarjanawiyata Tamansiswa);
29. Sosialisasi Kebijakan *Risk Register* (oleh Bank Victoria);
30. *National Anti Fraud Conference 2023* (oleh Association of Certified Fraud Examiners);
31. *Refreshment* Laporan Hasil Penilaian Kepatuhan (LHPK) Sistem Pembayaran dan *Financial Market Infrastructure* Bank Indonesia serta Kantor Pengelola Daftar Hitam Nasional (SP dan FMI BI serta KPDHN) Tahun 2023 (oleh Bank Indonesia);
32. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute);
33. *Induction Training Program* (oleh Bank Victoria); dan
34. Sosialisasi/*Focus Group Discussion Compliance Champion* - Budaya Kepatuhan (oleh Bank Victoria).

24. Compliance Risk for Financial Technology, Indonesian Banking Development Institute and Fintech Indonesia (by Indonesian FinTech Association);
25. Improving the Effectiveness of Work Synergy of SKAI, Compliance and Risk Functions (by Equivalent Training Center);
26. Breaking the Fast Together 2023 (by Bank Victoria);
27. Anti Fraud Management for Leaders Batch 2 (by Kanatta Daya);
28. Forensic Audit Webinar (by Sarjanawiyata Tamansiswa University);
29. Socialization of Risk Register Policy (by Bank Victoria);
30. National Anti Fraud Conference 2023 (by Association of Certified Fraud Examiners);
31. Refreshment of Compliance Assessment Report (LHPK) of Payment System and Financial Market Infrastructure of Bank Indonesia and National Blacklist Management Office (SP and FMI BI and KPDHN) in 2023 (by Bank Indonesia);
32. Expert Sharing Session - Sustainable Finance (by Financial Services Authority Institute);
33. Induction Training Program (by Bank Victoria); and
34. Socialization/Focus Group Discussion Compliance Champion - Compliance Culture (by Bank Victoria).

Akuntan Publik
Public Accountant

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

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

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

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

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

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

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

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

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

Jasa Non-Audit yang Diberikan Akuntan Publik

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

Non-Auditing Services Provided by Public Accountant

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

Koordinasi Akuntan Publik dengan Auditor Internal dan Komite Audit

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

Coordination between Public Accountant and Internal Auditor and Audit Committee

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

Sistem Pengendalian Internal
Internal Control System

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

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

Ruang Lingkup Pengendalian Internal

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

1. Direksi
   Bertanggung jawab menciptakan dan memelihara pengendalian internal yang efektif, serta memastikan bahwa sistem tersebut berjalan secara aman dan andal sesuai dengan tujuan pengendalian internal yang telah ditetapkan oleh Bank.
2. Dewan Komisaris
   Bertanggung jawab mengawasi pelaksanaan pengendalian internal secara umum, termasuk kebijakan Direksi yang menetapkan pengendalian internal.
3. SKAI & *Anti Fraud*
   Bertanggung jawab mengevaluasi dan berperan aktif dalam meningkatkan efektivitas pengendalian internal secara berkesinambungan, berkaitan dengan pelaksanaan operasional Bank yang berpotensi menimbulkan kerugian dalam pencapaian sasaran yang telah ditetapkan oleh manajemen. Terkait hal ini, Bank senantiasa memastikan agar jalur pelaporan telah memadai dan auditor internal telah memiliki keahlian, khususnya terkait praktik dan penerapan penilaian risiko.
4. Pejabat Eksekutif dan Karyawan
   Bertanggung jawab melaksanakan pengendalian internal yang telah ditetapkan oleh manajemen Bank. Melalui pengendalian internal yang efektif, tanggung jawab Pejabat Eksekutif dan karyawan Bank akan meningkat, mendorong budaya risiko yang memadai, serta mempercepat proses identifikasi terhadap praktik perbankan yang tidak sehat dan terhadap organisasi melalui sistem deteksi dini yang efisien.
5. Pihak Eksternal
   Antara lain meliputi Otoritas Jasa Keuangan, auditor eksternal, dan nasabah Bank yang berkepentingan terhadap terlaksananya pengendalian internal yang andal dan efektif.

Internal Control Scope

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

1. Board of Directors
   Responsible for creating and maintaining effective internal control, and ensuring that the system runs safely and reliably in accordance with the internal control objectives specified by the Bank.
2. Board of Commissioners
   Responsible for supervising the implementation of internal control in general, including the Board of Directors' policies that establish internal control.
3. SKAI & Anti Fraud
   Responsible for evaluating and taking an active role in improving the effectiveness of internal control on an ongoing basis, in relation to the implementation of the Bank's operations that may potentially incur losses in achieving the targets specified by the management. In this regard, the Bank consistently ensures that reporting channels are adequate and that internal auditors have the expertise, particularly regarding the practice and application of risk assessments.
4. Executive Officers and Employees
   Responsible for implementing the internal control established by the Bank's management. Through effective internal control, the responsibilities of Executive Officers and Bank employees will improve and promote an adequate risk culture, as well as accelerate the process of identifying unhealthy banking practices and organization through an efficient early-detection system.
5. External Parties
   Among others including the Financial Services Authority, external auditors, and Bank's customers who have an interest in the implementation of reliable and effective internal controls.

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

1. Struktur organisasi yang memadai;
2. Gaya kepemimpinan dan filosofi manajemen Bank;
3. Integritas dan nilai-nilai etika, serta kompetensi seluruh karyawan;
4. Kebijakan dan prosedur *human capital* Bank;
5. Atensi dan arahan manajemen Bank dan Komite lainnya, seperti Komite Pemantau Risiko; dan
6. Faktor-faktor eksternal yang memengaruhi operasional Bank dan penerapan manajemen risiko.

Dalam menetapkan unsur-unsur lingkungan pengendalian dan mengimplementasikan pengendalian internal yang efektif, Bank mempertimbangkan beberapa faktor, antara lain:
1. Total aset;
2. Jenis produk dan aktivitas yang ditawarkan, termasuk produk dan aktivitas baru;
3. Kompleksitas operasional, termasuk jaringan kantor;
4. Profil risiko dari setiap kegiatan usaha;
5. Metode yang digunakan untuk pengolahan data dan teknologi informasi, serta metodologi yang diterapkan untuk pengukuran, pemantauan, dan pembatasan (limit) risiko; serta
6. Ketentuan dan peraturan perundang-undangan.

Kesesuaian Pengendalian Internal dengan Kerangka COSO

Bank menerapkan SPI dengan 3 (tiga) tujuan utama, yaitu efektivitas operasional, keandalan pelaporan, dan kepatuhan kepada ketentuan yang berlaku. Implementasi SPI ini mengacu pada kerangka pengendalian internal yang dikembangkan oleh *Committee of Sponsoring Organizations of Treadway Commission* (COSO). COSO membagi pengendalian internal dalam 5 (lima) komponen yang saling terkait, yaitu:
1. Lingkungan pengendalian;
2. Penilaian risiko;
3. Aktivitas pengendalian;
4. Informasi dan komunikasi; dan
5. Kegiatan pemantauan.

Komponen Pengendalian Internal

Bank memiliki 5 (lima) komponen pengendalian internal yang saling berkaitan, dengan uraian sebagai berikut:
1. **Pengawasan oleh Manajemen dan Budaya Pengendalian**
   a. Dewan Komisaris bertanggung jawab untuk mengesahkan dan mengkaji kebijakan dan strategi usaha Bank, memahami dan mengendalikan risiko utama Bank,

The Board of Commissioners and Board of Directors also have a particular role in ensuring appropriate commitments, behaviors, concerns, and implementation of internal controls in the Bank's operational activities. For this reason, the Board of Commissioners and Board of Directors established elements of controlled environment, namely:
1. Sufficient organizational structure;
2. Bank's leadership style and management philosophy;
3. Integrity and ethical values, as well as the competence of all employees;
4. Bank's human capital policies and procedures;
5. Attention and direction of the Bank's management and other Committees, such as Risk Monitoring; and
6. External factors affecting the Bank's operations and the risk management implementation.

In determining the elements of the controlled environment and implementing effective internal controls, the Bank considers several factors, including:
1. Total assets;
2. The types of products and activities offered, including new products and activities;
3. Operational complexity, including office network;
4. Risk profile of each business activity;
5. Methods used for data and information technology processing, as well as methodology applied for risk measurement, monitoring, and limit; and
6. Provisions and laws and regulations.

Conformity of Internal Control with COSO Framework

The Bank implements SPI with 3 (three) main objectives, namely operational effectiveness, reporting reliability, and compliance with applicable regulations. The SPI implementation refers to the internal control framework developed by the Committee of Sponsoring Organizations of Treadway Commission (COSO). COSO divides internal control into 5 (five) interrelated components, which are:
1. The controlled environment;
2. Risk assessment;
3. Controlled activities;
4. Information and communication; and
5. Monitoring activity.

Internal Control Components

The Bank has 5 (five) interrelated internal control components, described as follows:
1. **Control by the Management and Control Culture**
   a. The Board of Commissioners is responsible for validating and reviewing the Bank's business policies and strategies, understanding and controlling the Bank's

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

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

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

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

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

2. Identifikasi dan Penilaian Risiko

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

3. Kegiatan Pengendalian Internal dan Pemisahan Fungsi

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

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

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

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

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

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

2. Risk Identification and Assessment

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

3. Activities of Internal Control and Separation of Functions

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

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

c. Pengendalian Sistem Informasi
Bank menerapkan pengendalian internal pada sistem informasi dan teknologi melalui audit rutin di Divisi *Information Technology* dan Divisi *Business Analytic and MIS*.

d. Pengendalian Aset Fisik
Pengendalian atas aset fisik dilakukan melalui audit tahunan di Divisi *Human Capital Management & General Affair* untuk memastikan keamanan fisik aset Bank.

e. Dokumentasi
Formalisasi dan pendokumentasian kebijakan, prosedur, sistem, standar akuntansi, dan proses audit dengan memadai. Selain itu, melakukan pembaruan berkala terhadap kebijakan dan SOP yang selanjutnya disampaikan kepada pejabat dan karyawan untuk mengakomodir kebutuhan Bank secara aktual.

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

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

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

c. Information System Control
The Bank implements internal control over information and technology system through routine audit in Information Technology Division and Business Analytic and MIS Division.

d. Control of Physical Assets
Physical asset control is performed through annual audit to Human Capital Management & General Affair Division to ensure the physical security of the Bank's assets.

e. Documentation
Formalizing and documenting policies, procedures, systems, accounting standards, and audit process adequately. In addition, periodically renewing the policies and SOP which are then conveyed to officials and employees to accommodate the Bank's actual requirements.

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

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

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

Tinjauan atas Efektivitas Sistem Pengendalian Internal 2023

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

Overview of the Effectiveness of Internal Control System in 2023

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

Pernyataan Dewan Komisaris dan Direksi atas Kecukupan Sistem Pengendalian Internal

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

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

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

Fungsi Kepatuhan
Compliance Function

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

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

Pedoman Fungsi Kepatuhan

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

Compliance Function Charter

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

Penanggung Jawab Fungsi Kepatuhan

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

Person in Charge of the Compliance Function

The Bank specifically hired a Director of Compliance and Risk Management and Compliance & System Procedure Division that focus on and are in charge of the implementation of the Bank's compliance function. The implementation of compliance function is also under active supervision of the Board of Commissioners. Duties and responsibilities of each party are described as follows:

1. **Dewan Komisaris**
   a. Mengevaluasi pelaksanaan fungsi kepatuhan Bank paling sedikit 2 (dua) kali dalam setahun; dan
   b. Berdasarkan hasil evaluasi pelaksanaan fungsi kepatuhan, Dewan Komisaris menyampaikan saran-saran dalam rangka peningkatan kualitas pelaksanaan fungsi kepatuhan kepada Direktur Utama dengan tembusan kepada Direktur Kepatuhan dan Manajemen Risiko.
2. **Direktur Kepatuhan dan Manajemen Risiko**
   a. Merumuskan strategi guna mendorong terciptanya budaya kepatuhan Bank;
   b. Mengusulkan kebijakan kepatuhan atau prinsip-prinsip kepatuhan yang akan ditetapkan oleh Direksi;
   c. Menetapkan sistem dan prosedur kepatuhan yang digunakan untuk menyusun ketentuan dan pedoman internal Bank;
   d. Memastikan bahwa seluruh kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan;
   e. Meminimalkan risiko kepatuhan Bank;
   f. Melakukan tindakan pencegahan agar kebijakan dan/atau keputusan yang diambil Direksi Bank tidak menyimpang dari ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan; serta
   g. Melakukan tugas lain yang terkait dengan fungsi kepatuhan.

Terkait dengan pelaksanaan tata kelola terintegrasi, maka Direktur Kepatuhan dan Manajemen Risiko yang telah ditunjuk sebagai Direktur *in Charge* dapat merumuskan langkah-langkah strategis dalam mendukung dan meningkatkan efektivitas penerapan fungsi kepatuhan, penerapan manajemen risiko, serta penerapan tata kelola terintegrasi pada kelompok keuangan Grup Victoria. Pelaporan pelaksanaan tugas dan tanggung jawab dari fungsi kepatuhan kepada regulator dilakukan oleh Direktur Kepatuhan dan Manajemen Risiko dengan tembusan kepada Dewan Komisaris paling kurang secara triwulan.

3. **Divisi *Compliance & System Procedure***
   a. Membuat langkah untuk mendukung terciptanya budaya kepatuhan pada seluruh kegiatan usaha Bank pada setiap jenjang organisasi;
   b. Melakukan identifikasi, pengukuran, pemantauan, dan pengendalian terhadap risiko kepatuhan dengan mengacu pada ketentuan Otoritas Jasa Keuangan;
   c. Menilai dan mengevaluasi efektivitas, kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan peraturan perundang-undangan;
   d. Melakukan kaji ulang dan/atau merekomendasikan untuk menginikan dan menyempurnakan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan;

1. **Board of Commissioners**
   a. Evaluating the implementation of the Bank's compliance function at least 2 (two) times a year; and
   b. Based on the evaluation results of implementation of compliance function, the Board of Commissioners provides suggestions to improve the quality of compliance function to the President Director with a copy to the Director of Compliance and Risk Management.
2. **Director of Compliance and Risk Management**
   a. Formulating strategies to encourage the creation of the Bank's compliance culture;
   b. Proposing compliance policies or compliance principles to be specified by the Board of Directors;
   c. Establishing compliance systems and procedures to develop the Bank's internal provisions and guidelines;
   d. Ensuring that all policies, provisions, systems, and procedures and business activities conducted by the Bank are in accordance with the provisions of Financial Services Authority, and the laws and regulations;
   e. Minimizing the Bank's compliance risk;
   f. Taking precautions so that the policies and/or decisions taken by the Bank's Board of Directors do not deviate from the provisions of the Financial Services Authority and the provisions of laws and regulations; and
   g. Performing other tasks associated with the compliance function.

Related to the implementation of integrated governance, the Director of Compliance and Risk Management who was appointed as the Director in Charge can formulate strategic steps to support and improve the effectiveness of compliance function implementation, risk management implementation, and the integrated governance implementation to Victoria Group Financial Conglomeration. Reporting of the implementation of duties and responsibilities of the compliance function to the regulator is conducted by the Director of Compliance and Risk Management with copies

3. **Compliance & System Procedure Division**
   a. Preparing steps in order to support the creation of a compliance culture on all of the Bank's business activities at every organizational level;
   b. Identifying, measuring, monitoring, and controlling the compliance risks by referring to the provisions of the Financial Services Authority;
   c. Assessing and evaluating the effectiveness, adequacy, and conformity of the Bank's policies, regulations, systems, and procedures against the provisions of laws and regulations;
   d. Reviewing and/or recommending updates and refinements of policies, provisions, systems, and procedures owned by the Bank to be in accordance with the provisions of the Financial Services Authority and provisions of laws and regulations;

e. Melakukan upaya untuk memastikan bahwa kebijakan, ketentuan, sistem dan prosedur, serta kegiatan usaha Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan; serta
f. Melakukan tugas lain yang terkait dengan fungsi kepatuhan.

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

e. Taking measures to ensure that the policies, regulations, systems, and procedures, as well as the Bank's business activities to be in accordance with the provisions of the Financial Services Authority and provisions of laws and regulations; and
f. Performing other tasks associated with the compliance function.

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

Profil Kepala Divisi *Compliance & System Procedure Division*

Profile of the Head of Compliance & System Procedure Division

RR UTAMI TJIPTO

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

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Jakarta

Usia
Age
61 tahun / years old

Domisili
Domicile
Jakarta

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

Riwayat Pendidikan
Sarjana Hukum dari Universitas Airlangga (1986).

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

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

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

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

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

Education
Bachelor of Laws from Airlangga University (1986).

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

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

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

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

Laporan Singkat Pelaksanaan Kegiatan Fungsi Kepatuhan Tahun 2023

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

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

Pelatihan dan/atau Peningkatan Fungsi Kepatuhan

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

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

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

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

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

Compliance Function's Training and/or Development Programs

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

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

8. *Liquidity Coverage Ratio* (LCR) *and Net Stable Funding Ratio* (NSFR) Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 dan Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 (oleh Risiko Manajemen Gagasan);
9. Sertifikasi Auditor Internal untuk Peningkatan Kecukupan/ Efektivitas Evaluasi *Governance, Risk, and Compliance* (oleh Perbanas Institute);
10. *Anti-Money Laundering in Digital Era: Lesson Learned from Selected Countries Time* (oleh Otoritas Jasa Keuangan Institute);
11. *Lesson Learned* Kasus Silicon Valley Bank (oleh Lembaga Pengembangan Perbankan Indonesia);
12. Mengatasi Tantangan dan Menghadapi Perubahan dalam Sektor Jasa Keuangan (oleh Otoritas Jasa Keuangan Institute);
13. *Refreshment* Sertifikasi Manajemen Risiko: *Risk in Digital World – Batch* 4 (oleh PT Efektifpro Knowledge Source);
14. *Sharing Session GCG* (oleh Bapak Heru);
15. Membangun Keyakinan Nasabah Aset Digital dari Risiko Siber (oleh Otoritas Jasa Keuangan Institute);
16. Bisnis Indonesia *Green Economy* Forum 2023 "*Realizing Sustainable Growth through Green Economy Commitment* (oleh Bisnis Indonesia);
17. Penerapan *Cloud Computing* di Industri Jasa Keuangan (oleh Otoritas Jasa Keuangan Institute);
18. *How to Manage Climate Related Risk in Banking Industry* (oleh Otoritas Jasa Keuangan Institute);
19. Mengenal Lebih Jauh Pengaturan Undang-Undang P2SK dalam Rangka Penguatan Sektor Perbankan *Confirmation* Keuangan (oleh Otoritas Jasa Keuangan Institute);
20. *ASEAN Market Capital Forum and International Sustainability Standards Boards Join Conference and Technical Training on the International Financial Reporting Standards Sustainability Disclosure Standards* (oleh ASEAN Market Capital Forum and International Financial Reporting Standards);
21. Penerapan Undang-Undang Perlidungan Data Pribadi dan Tantangan Implementasinya (oleh Forum Komunikasi Direktur Kepatuhan Perbankan);
22. Penyampaian Informasi Penerbitan dan Sosialisasi Peraturan Bank Indonesia tentang Pinjaman Likuiditas Jangka Pendek bagi Bank Umum Konvensional (oleh Bank Indonesia);
23. Peluang Perdagangan Karbon dalam Upaya Dekarbonisasi (oleh Otoritas Jasa Keuangan Institute);
24. Waspada Modus Penipuan Gaya Baru (oleh Otoritas Jasa Keuangan Institute);
25. Sosialisasi Peraturan Bank Indonesia tentang Pelindungan Konsumen Bank Indonesia (oleh Bank Indonesia);
26. *Compliance Risk* untuk *Financial Technology* (oleh Lembaga Pengembangan Perbankan Indonesia);

8. Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) Financial Services Authority Regulation No. 42/POJK.03/2015 and Financial Services Authority Regulation No. 50/POJK.03/2017 (by Risk Management Ideas);
9. Internal Auditor Certification to Improve the Adequacy/ Effectiveness of Governance, Risk, and Compliance Evaluation (by Perbanas Institute);
10. Anti-Money Laundering in Digital Era: Lesson Learned from Selected Countries Time (by Financial Services Authority Institute);
11. Silicon Valley Bank Case Lesson Learned (by Indonesian Banking Development Institute);
12. Overcoming Challenges and Facing Changes in the Financial Services Sector (by Financial Services Authority Institute);
13. Risk Management Certification Refreshment: Risk in Digital World - Batch 4 (by PT Efektifpro Knowledge Source);
14. GCG Sharing Session (by Mr. Heru);
15. Building Customer Confidence in Digital Assets from Cyber Risk (by Financial Services Authority Institute);
16. Bisnis Indonesia Green Economy Forum 2023 "Realizing Sustainable Growth through Green Economy Commitment (by Bisnis Indonesia);
17. Application of Cloud Computing in the Financial Services Industry (by Financial Services Authority Institute);
18. How to Manage Climate Related Risk in Banking Industry (by Financial Services Authority Institute);
19. Getting to Know More about the P2SK Law Arrangement in the Framework of Strengthening the Financial Confirmation Banking Sector (by Financial Services Authority Institute);
20. ASEAN Market Capital Forum and International Sustainability Standards Boards Join Conference and Technical Training on the International Financial Reporting Standards Sustainability Disclosure Standards (by ASEAN Market Capital Forum and International Financial Reporting Standards);
21. Implementation of the Personal Data Protection Law and its Implementation Challenges (by the Banking Compliance Director Communication Forum);
22. Submission of Information on the Issuance and Socialization of Bank Indonesia Regulation on Short-Term Liquidity Loans for Conventional Commercial Banks (by Bank Indonesia);
23. Carbon Trading Opportunities in Decarbonization Efforts (by Financial Services Authority Institute);
24. Beware of New Style Fraud Modes (by Financial Services Authority Institute);
25. Socialization of Bank Indonesia Regulation on Bank Indonesia Consumer Protection (by Bank Indonesia);
26. Compliance Risk for Financial Technology (by Indonesian Banking Development Institute);

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

27. Improving the Effectiveness of Work Synergy of SKAI Function, Compliance Function and Risk Management Function (by Training Center Equivalent);
28. Compliance Refreshment on Fulfillment of Obligations by Listed Companies (by the Financial Services Authority and the Indonesia Stock Exchange);
29. Leadership in Changing Atmosphere (by Financial Services Authority Institute);
30. Effectiveness of Digital Maturity Assessment in Measuring the Maturity of Banking Digital Transformation (by Banking Compliance Director Communication Forum);
31. Enhancing Financial Performance through Data Analytics (by Financial Services Authority Institute and The London Institute of Banking and Finance);
32. Utilization of Internet of Things (IoT) in the Financial Services Industry (by Financial Services Authority Institute);
33. Refreshment on Prevention of Money Laundering, Prevention of Financing of Terrorism and Prevention of Financing of Proliferation of Weapons of Mass Destruction based on Financial Services Authority Regulation No. 8 of 2023 (by PT Andara Sarana);
34. Opportunities and Challenges of Financial Technology P2P Lending in the Era of P2SK Law (by Financial Services Authority Institute);
35. Managing Environmental, Social and Governance Risk and Opportunities (by Financial Services Authority Institute and The London Institute of Banking and Finance);
36. Keys to Success in Creating Professional Talent in the Financial Services Sector (by Financial Services Authority Institute);
37. How to Drive Corporate Performance through Accounting Practices (by the Financial Services Authority Institute);
38. Getting to Know More about P2SK Law Arrangement in the Framework of Strengthening Consumer Literacy, Inclusion, and Protection (by the Financial Services Authority Institute);
39. Enhancing Environmental, Social, and Governance Through Best Practices in Accounting (by Financial Services Authority Institute);
40. Optimizing Potential and Improving Performance in the Digital Era (by Financial Services Authority Institute);
41. Welcoming Crypto Assets in Strengthening the Digital Financial Ecosystem in Indonesia (by Financial Services Authority Institute);
42. Welcoming the Challenges and Opportunities of the Insurance Industry in 2024 (by the Indonesian Banking Development Institute);
43. Anti Fraud Management for Leaders Batch 2 (by PT Kanatta Daya Indonesia);
44. Expert Sharing Session - Sustainable Finance (by Financial Services Authority Institute);
45. Induction Training Program (by Bank Victoria); and
46. Legal Aspects and Documents of Company Account Opening (by Bank Victoria).

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

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

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

Etika Pengadaan Barang dan Jasa

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

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

Ethics of Procurement of Goods and Services

Ethics in the procurement of goods and/or services at Bank Victoria is regulated by the Board of Directors' Decision Letter No. 001/SK-DIR/01/21 dated 11 January 2021 on Employee's Code of Conduct of PT Bank Victoria International Tbk. This conduct ensures that the employee's relationship with partner or prospective partner during the procurement activities of goods and/or services complies with the following matters:

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

Pengadaan Barang dan Jasa Tahun 2023

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

Procurement of Goods and Services in 2023

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

Perkara Hukum
Legal Cases

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

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

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

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

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

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

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

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

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

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

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

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

Perkara / Case No. 1325/Pdt.G/2023/PN.Jkt.Sby	
Para Pihak Parties	Penggugat: Plaintiff: PT Mas Murni Indonesia Tbk Tergugat: Defendant: Bank Victoria Turut Tergugat: PT Tunas Unggul Lestari, Kantor Pertanahan Kota Surabaya I, dan Kantor Pelayanan Kekayaan Negara dan Lelang Surabaya Co-Defendants: PT Tunas Unggul Lestari, Surabaya City Land Office I, and Surabaya State Wealth and Auction Service Office
Pokok Perkara Case Profile	Gugatan Perbuatan Melawan Hukum Wrongful Acts Lawsuit
Nilai Nominal Gugatan Nominal Value of Claim	Materiel dan Imateriel: Material dan Immaterial: Rp1,000,000,000
Status Penyelesaian Perkara Case Settlement Status	Dalam Proses di Pengadilan Negeri Surabaya In Process at Surabaya District Court
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum Ada None Yet
Sanksi Administrasi Administrative Sanctions	Belum Ada None Yet

Perkara Penting yang Dihadapi Dewan Komisaris dan Direksi Tahun 2023

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

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

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

Sanksi Administratif Tahun 2023
Administrative Sanctions in 2023

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

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

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

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

1. Pengawasan Aktif Direksi dan Dewan Komisaris terhadap Program APU, PPT, dan PPPSPM
   Direksi Bank memastikan efektivitas penerapan Prinsip APU, PPT, dan PPPSPM melalui:

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

   Dewan Komisaris bertanggung jawab untuk:
   a. Memastikan Bank memiliki kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM;

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

1. Active Supervision by the Board of Directors and the Board of Commissioners of the AML, CTF, and CPF programs.
   The Bank's Board of Directors ensures the effective implementation of the AML, CTF, and CPF principles through the following measures:
   a. Proposing written policies and procedures for the implementation of the AML, CTF, and CPF programs to the Board of Commissioners;
   b. Ensuring that the implementation of the AML, CTF, and CPF programs is carried out in accordance with the established written policies and procedures;
   c. Establishing a specialized work unit and/or appointing officials in charge of the implementation of the AML, CTF, and CPF programs;
   d. Supervising the compliance of work units in implementing the AML, CTF, and CPF programs;
   e. Ensuring that the written policies and procedures for the implementation of the AML, CTF, and CPF programs align with changes and developments in products, services, and technology in the financial services sector, as well as with the evolving modes of TPPU, TPPT, and/or PPPSPM;
   f. Ensuring that officials and/or employees, especially those from relevant work units and new employees, have attended training related to the implementation of the AML, CTF, and CPF programs at least once a year; and

   g. Ensuring that discussions related to the implementation of the AML, CTF, and CPF programs are included in the Board of Directors' meetings.

   The Board of Commissioners is responsible for:
   a. Ensuring that the Bank has policies and procedures for implementing AML, CTF, and CPF programs;

b. Memberikan persetujuan atas kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM yang diusulkan oleh Direksi;
c. Melakukan evaluasi atas kebijakan dan prosedur Penerapan Program APU, PPT, dan PPPSPM;
d. Melakukan pengawasan atas pelaksanaan tanggung jawab Direksi terhadap penerapan program APU, PPT, dan PPPSPM; dan
e. Memastikan adanya pembahasan terkait penerapan progam APU, PPT, dan PPPSPM dalam rapat Direksi dan Dewan Komisaris.

2. Kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM
Bank telah memiliki kebijakan dan prosedur yang sejalan dan sesuai dengan peraturan perundang-undangan dan *best practices,* antara lain mencakup:
a. Uji tuntas nasabah/*Customer Due Diligence* (CDD) dan/atau uji lanjut nasabah/*Enhance Due Diligence* (EDD) terhadap calon nasabah, nasabah, *conductor* dan *Walk in Customer* (WIC), *Beneficial Owner* (BO), dan *Politically Exposed Person* (PEP);
b. Penghentian Sementara transaksi dan penundaan transaksi;
c. Penolakan transaksi dan penutupan hubungan usaha;
d. Pengelolaan risiko pencucian uang dan/atau pendanaan terorisme berdasarkan pendekatan berbasis risiko (*risk-based approach*) terkait nasabah, negara/area geografis, produk, jasa dan transaksi, serta jaringan distribusi (*delivery channels*);
e. Pemantauan dan pengkinian;
f. *Cross border correspondent banking;*
g. Transfer dana;
h. Penatausahaan dokumen; dan
i. Pelaporan dan sanksi.

3. Pengendalian internal yang efektif dalam penerapan APU, PPT, dan PPPSPM, antara lain dilakukan dengan:
a. Memiliki kebijakan dan prosedur APU, PPT, dan PPPSPM serta pemantauan internal yang tepat;
b. Adanya batasan wewenang dan tanggung jawab yang jelas terhadap satuan kerja terkait dengan penerapan program APU, PPT, dan PPPSPM, baik melalui *first line of defense*, *second line of defense,* maupun *third line of defense*; dan
c. Melakukan pemeriksaan untuk memastikan efektivitas pelaksanaan program APU, PPT, dan PPPSPM oleh SKAI & Anti *Fraud*.

4. Sistem informasi manajemen
Untuk mengoptimalkan pemantauan transaksi dalam pelaksanaan program APU, PPT, dan PPPSPM, Bank secara berkelanjutan mengembangkan teknologi sistem informasi, antara lain:
a. Melakukan penyempurnaan sistem dan aplikasi pendukung untuk Laporan Transaksi Keuangan Tunai, Laporan Transfer Dana dari dan ke Luar Negeri, Laporan Transaksi Keuangan Mencurigakan, *Filtering*

b. Approving the policies and procedures for implementing the AML, CTF, and CPF programs proposed by the Board of Directors;
c. Evaluating the policies and procedures for implementing the AML, CTF, and CPF programs;
d. Supervising the execution of the Board of Directors' responsibilities regarding the implementation of the AML, CTF, and CPF programs; and
e. Ensuring that discussions related to the implementation of the AML, CTF, and CPF programs are included in the Board of Directors and Board of Commissioners meetings

2. Policies and procedures for the implementation of AML, CTF, and CPF programs
The Bank has established policies and procedures that align with laws and regulations and best practices, which include:
a. Customer Due Diligence (CDD) and/or Enhanced Due Diligence (EDD) for prospective customers, customers, conductors and Walk-in Customers (WIC), Beneficial Owners (BO), and Politically Exposed Persons (PEP);
b. Temporary suspension and delay of transactions;
c. Rejection of transactions and termination of business relationships;
d. Management of money laundering and/or terrorism financing risks based on a risk-based approach concerning customers, geographical areas/countries, products, services and transactions, as well as delivery channels;
e. Monitoring and updating;
f. Cross-border correspondent banking;
g. Fund transfers;
h. Document administration; and
i. Reporting and sanctions.

3. Effective internal control in the implementation of AML, CTF, and CPF programs is achieved through the following measures:
a. Establishing appropriate AML, CTF, and CPF policies and procedures, as well as proper internal monitoring;
b. Establishing clear limitations of authority and responsibility for the work units involved in the implementation of the AML, CTF, and CPF programs, whether through the first line of defense, second line of defense, or third line of defense; and
c. Conducting audits to ensure the effective implementation of the AML, CTF, and CPF programs. The audits are conducted by SKAI & Anti-Fraud.

4. Management information system
To optimize transaction monitoring in the implementation of AML, CTF, and CPF programs, the Bank is continuously developing its information system technology by, among others:
a. Refining the system and supporting applications for Cash Financial Transaction Reports, International Fund Transfer Reports, Suspicious Financial Transaction Reports, Filtering and Screening Terrorist (DTTOT List),

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

b. Mengembangkan aplikasi Sistem Terduga Pendanaan Terorisme (SIPENDAR) PPATK; dan
c. Mengembangkan aplikasi Sistem Informasi Pengguna Jasa Terpadu (SIPESAT) PPATK.

5. Sumber daya manusia dan pelatihan
   Bank menyelenggarakan program pelatihan yang berkesinambungan dan berkala paling sedikit 1 (satu) kali dalam 1 (satu) tahun untuk memastikan sumber daya manusia memiliki pengetahuan yang memadai, terutama terkait APU, PPT, dan PPPSPM. Pelatihan mencakup penerapan peraturan perundang-undangan terkait, tipologi pencucian uang dan pendanaan terorisme, serta kebijakan dan prosedur internal program APU, PPT, dan PPPSPM beserta peran serta tanggung jawab karyawan dalam pencegahan pencucian uang, pendanaan terorisme, dan pendanaan proliferasi senjata pemusnah massal.

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

Financial Integrity Rating on Money Laundering/Terrorism Financing (FIR on ML/TF)

Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF) merupakan penilaian terhadap integritas dan efektivitas pihak pelapor dalam menjalankan program APU dan PPT, khususnya dari aspek kinerja pelaporan APU, PPT, dan PPPSPM.

Pengukuran nilai FIR on ML/TF dilakukan terhadap 3 (tiga) dimensi, yaitu:

1. Dimensi 1 (satu) untuk mengukur tingkat komitmen pihak pelapor dalam mendukung PPATK dan aparat penegak hukum dalam penelusuran transaksi keuangan terkait indikasi TPPU dan TPPT;
2. Dimensi 2 (dua) untuk mengukur tingkat implementasi tata kelola pelaporan APU dan PPT yang dilakukan oleh pihak pelapor sesuai dengan ketentuan Lembaga Pengawas dan Pengatur (LPP) dan pedoman pelaporan dari PPATK; dan

PEP Screening Detection, and Customer Due Diligence (CDD) Risk Scoring within a system called SmartAML. SmartAML is used to support the optimal implementation of the "know your customer" process, particularly in detecting/monitoring customer transactions that exhibit patterns of money laundering, terrorism financing, and proliferation of weapons of mass destruction financing behavior;

b. Developing PPATK's Suspected Terrorism Financing Information System (SIPENDAR) application; and
c. Developing PPATK's Integrated Service User Information System (SIPESAT) application.

5. Human resources and training
   The Bank organizes regular and continuous training programs at least once a year to ensure that its human resources are adequately knowledgeable, especially in relation to AML, CTF, and CPF. The training covers the application of relevant laws and regulations, typologies of money laundering and terrorism financing, as well as internal policies and procedures of the AML, CTF, and CPF programs, along with the roles and responsibilities of employees in preventing money laundering, terrorism financing, and financing the proliferation of weapons of mass destruction.

In 2023, the Bank strengthened the AML, CTF, and CPF programs to mitigate the risk of TPPU, TPPT, and TPPPSPM by enhancing the competence of human resources, conducting training, and organizing group discussion forums. Furthermore, the reliability of the system supporting the implementation of the AML, CTF, and CPF programs was ensured through the SmartAML system. The Bank also continuously enhanced the system by adopting new, flexible technology that aligns with digital financial transaction activities and the latest developments in the Bank.

Financial Integrity Rating on Money Laundering/Terrorism Finasncing (FIR on ML/TF)

The Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF) is an assessment of the integrity and effectiveness of the reporting party in implementing AML, CTF, and CPF programs, particularly from the aspect of AML, CTF, and CPF reporting performance.

The FIR on ML/TF value is measured across 3 (three) dimensions:

1. Dimension 1 (one) measures the commitment level of the reporting party in supporting PPATK and law enforcement agencies in tracing financial transactions related to indications of TPPU and TPPT;
2. Dimension 2 (two) measures the level of implementation of AML and CTF reporting governance carried out by the reporting party in accordance with the provisions of the Supervisory and Regulatory Bodies (LPP) and PPATK reporting guidelines; and

3. Dimensi 3 (tiga) untuk mengukur tingkat kepatuhan pihak pelapor terhadap kewajiban pelaporan APU dan PPT kepada PPATK serta kualitas formal dan materiel atas keseluruhan laporan yang telah disampaikan sesuai dengan peraturan PPATK.

Hasil FIR on ML/TF menjadi tolok ukur bagi PPATK dan LPP dalam merumuskan langkah-langkah pembinaan, pengawasan, dan pengaturan berbasis risiko, khususnya untuk penguatan sistem APU dan PPT di setiap pihak pelapor dan penguatan integritas sistem keuangan secara nasional.

Nilai FIR on ML/TF yang diperoleh Bank Victoria pada tahun 2023 sebesar 9,17 yang dikontribusikan oleh dimensi 1 (satu) sebesar 9,96, dimensi 2 (dua) sebesar 9,42, dan dimensi 3 (tiga) sebesar 8,77. Hal ini menunjukkan bahwa tingkat komitmen Bank Victoria dalam mendukung PPATK dan aparat penegak hukum untuk melakukan penelusuran transaksi keuangan terkait indikasi TPPU dan TPPT, tingkat implementasi tata kelola pelaporan APU dan PPT sesuai ketentuan LPP dan pedoman pelaporan PPATK, tingkat kepatuhan terhadap kewajiban pelaporan APU dan PPT kepada PPATK, serta kualitas laporan yang disampaikan masuk pada kategori Sangat Baik.

3. Dimension 3 (three) measures the compliance level of the reporting party with the obligation to report AML and CTF to PPATK and the formal and material quality of the overall reports submitted in accordance with PPATK regulations.

The FIR on ML/TF results serves as a benchmark for PPATK and LPP in formulating risk-based development, supervision, and regulation measures, especially for strengthening the AML and CTF systems in each reporting party and strengthening the integrity of the national financial system.

In 2023, Bank Victoria obtained an FIR on ML/TF value of 9.17, contributed by Dimension 1 (one) at 9.96, Dimension 2 (two) at 9.42, and Dimension 3 (three) at 8.77. This achievement indicates that Bank Victoria's commitment level in supporting PPATK and law enforcement agencies to trace financial transactions related to TPPU and TPPT indications, the level of implementation of AML and CTF reporting governance in accordance with LPP provisions and PPATK reporting guidelines, the compliance level with the obligation to report AML and CTF to PPATK, and the quality of the reports submitted are in the "Very Good" ("Sangat Baik") category.

Pemberian Dana Kegiatan Politik [POJK F.1]
Provision of Funds for Political Activities

Kebijakan internal Bank melarang keterlibatan karyawan dalam kegiatan politik dan memberikan dana untuk tujuan politik. Kebijakan ini bertujuan menjaga independensi dan profesionalisme Bank serta karyawan. Pada tahun 2023, Bank Victoria tidak terlibat dalam kegiatan politik dan tidak memberikan dana untuk kepentingan politik.

The Bank's internal policy prohibits employee involvement in political activities nor providing funds for political purposes. This policy aims to maintain the independence and professionalism of the Bank and its employees. In 2023, Bank Victoria was not involved in political activities, nor did it provide funds for political purposes.

Persaingan Usaha yang Sehat [POJK F.1]
Fair Business Competition

Dalam menjalankan kegiatan usaha, Bank Victoria menegakkan nilai etika dan moral, khususnya dalam praktik persaingan usaha yang sehat. Upaya yang dilakukan Bank meliputi kepatuhan terhadap Undang-Undang Anti Monopoli, melakukan riset pasar untuk memahami posisi pesaing, melakukan persaingan yang sehat dengan peningkatan produk dan layanan berkualitas, serta melindungi kepentingan nasabah dari praktik bisnis yang tidak sehat. Bank juga menghormati Hak Kekayaan Intelektual (HAKI) dengan mengajak seluruh jajaran manajemen dan karyawan untuk menghargai karya milik pihak lain, mendorong berpartisipasi aktif dalam pengembangan proses atau produk yang akan digunakan Bank, dan melindungi HAKI milik Bank.

In carrying out business activities, Bank Victoria upholds ethical and moral values, particularly in the practice of fair business competition. The Bank's efforts include compliance with the Anti Monopoly Law, conducting market research to understand competitors' positions, conducting fair competition by improving quality products and services, and protecting customer interests from unfair business practices. The Bank also respects Intellectual Property Rights (IPR) by inviting all levels of management and employees to respect the work of other parties, promoting active participation in the development of process or products that will be used by the Bank, and protecting the Bank's IPR.

Kode Etik [POJK F.1]
Code of Conduct

Bank Victoria menetapkan Kode Etik sebagai panduan wajib bagi semua insan Bank. Kode Etik Bank Victoria ditetapkan melalui Keputusan Direksi No. 024A/SK-DIR/02/23 tanggal 24 Februari 2023. Kode Etik harus diikuti dalam interaksi dengan nasabah, rekanan, dan sesama karyawan. Dengan mematuhi Kode Etik, diharapkan dapat mencegah hubungan yang tidak wajar antara nasabah, rekanan, atau sesama karyawan.

Bank Victoria established a Code of Conduct as a mandatory guide for all Bank personnel. Bank Victoria's Code of Conduct was established through the Board of Directors' Decision Letter No. 024A/SK-DIR/02/23 dated 24 February 2023. The Code of Conduct must be followed in interactions with customers, partners, and among employees. Compliance with the Code of Conduct is expected to prevent unfair relationships between customers, partners, or among employees.

Pokok Isi Kode Etik

Pokok-pokok Kode Etik Bank Victoria sebagai berikut:
1. Standar Etika Bisnis
   a. Etika Bank dengan karyawan;
   b. Etika Bank dengan nasabah;
   c. Etika Bank dengan penyedia barang dan jasa (evaluasi yang objektif dalam pengadaan perlengkapan dan peralatan Bank);
   d. Etika Bank dengan pesaing;
   e. Etika Bank dengan pemerintah;
   f. Etika Bank dengan masyarakat;
   g. Etika Bank dengan media massa; dan
   h. Etika Bank dengan organisasi profesi.
2. Standar Perilaku Karyawan
   a. Tuntunan perilaku karyawan;
   b. Penanganan benturan kepentingan;
   c. Pedoman pemberian dan penerimaan hadiah dan donasi;
   d. Pedoman kepatuhan terhadap peraturan;
   e. Pedoman menjaga kerahasiaan data dan informasi perusahaan;
   f. Pedoman aktivitas politik; dan
   g. Pedoman pelaporan atas pelanggaran dan perlindungan pelapor.

Principles of Code of Conduct

The principles of Code of Conduct of Bank Victoria are as follows:
1. Standard Business Ethics
   a. Bank's Ethics with employees;
   b. Bank's Ethics with customers;
   c. Bank's Ethics with provider of goods and services (objective evaluation in the procurement of the Bank's equipment and tools);
   d. Bank's Ethics with competitors;
   e. Bank's Ethics with the government;
   f. Bank's Ethics with the communities;
   g. Bank's Ethics with mass media; and
   h. Bank's Ethics with professional organizations.
2. Standard Code of Conduct
   a. Employee behavior guidelines;
   b. Management of conflict of interest;
   c. Guidelines for giving and receiving gifts and donations;
   d. Regulatory compliance guidelines;
   e. Guidelines for maintaining confidentiality of company data and information;
   f. Political activity guidelines; and
   g. Guidelines for reporting violations and protection of whistleblower.

Komitmen Kepatuhan terhadap Kode Etik

Bank Victoria komitmen untuk mematuhi Kode Etik sebagai standar etika tertinggi selain peraturan perundang-undangan. Semua pihak di Bank, termasuk Dewan Komisaris, Direksi, Pejabat Eksekutif, dan karyawan diwajibkan mematuhi Kode Etik dan menandatangani Surat Pernyataan yang dimuat pada halaman akhir Kode Etik.

Commitment to Complying with Code of Conduct

Bank Victoria is committed to complying with the Code of Conduct as the highest ethical standard in addition to the laws and regulations. All parties at the Bank, including the Board of Commissioners, Board of Directors, Executive Officials, and employees are required to adhere to the Code of Conduct and sign a Statement Letter set out in the final page of the Code of Conduct.

Penyebarluasan dan Sosialisasi Kode Etik

Upaya penyebarluasan dan sosialisasi Kode Etik melalui beberapa cara, yaitu:

1. Menyampaikan Kode Etik kepada seluruh karyawan melalui media internal yang dapat diakses setiap saat;
2. Menyampaikan etika bisnis secara berkala melalui memo atau surat dari Direksi atau Divisi terkait;
3. Mendistribusikan buku saku Kode Etik yang wajib dipelajari dan dilaksanakan oleh setiap karyawan; dan
4. Mengingatkan penerapan Kode Etik melalui pelatihan, induksi untuk karyawan baru, dan forum-forum pelatihan dengan melibatkan pihak eksternal.

Circulation and Dissemination of Code of Conduct

The efforts to circulate and disseminate the Code of Conduct is carried out through several means, namely:

1. Disseminates the Code of Conduct to all employees through internal media accessible at any time;
2. Disseminates business ethics periodically through memos or letters from the Board of Directors or related Divisions;
3. Distributes the Code of Conduct pocket book that must be studied and carried out by every employee; and
4. Reminds the implementation of the Code of Conduct through training, induction training programs for new employees, and through training forums involving external parties.

Upaya Penerapan dan Penegakan Kode Etik

Penerapan dan Penegakan secara Organisasi

1. Dewan Komisaris dibantu oleh Komite Nominasi dan Remunerasi bertanggung jawab atas dipatuhinya Kode Etik di lingkungan Bank;
2. Direksi dibantu oleh Divisi *Human Capital Management & General Affair* bertanggung jawab atas penerapan Kode Etik di lingkungan Bank;
3. Kepala Divisi, Manajer, dan setingkat Manajer bertanggung jawab atas penerapan Kode Etik di lingkungan Divisi/Unit Kerja masing-masing;
4. Direksi menunjuk Kepala Divisi *Human Capital Management & General Affair* beserta jajarannya yang bertanggung jawab untuk melaporkan pelanggaran terhadap pelaksanaan Kode Etik; dan
5. Setiap karyawan wajib membaca Kode Etik melalui intranet dan menandatangani formulir pernyataan bahwa yang bersangkutan telah membaca, memahami, dan setuju untuk mematuhi Kode Etik yang didokumentasikan oleh Divisi *Human Capital Management & General Affair.*

Penegakan Pedoman Kode Etik

1. Setiap karyawan Bank harus melaporkan setiap fakta penyimpangan Pedoman Kode Etik Perilaku Karyawan kepada Divisi *Human Capital Management & General Affair* dan identitas pelapor akan dilindungi;
2. Divisi *Human Capital Management & General Affair* menindaklanjuti setiap laporan dan menyampaikan hasil kajiannya kepada Direksi dan/atau Dewan Komisaris sesuai dengan lingkup tanggung jawabnya. Penanganan tindakan penyimpangan terhadap Pedoman Kode Etik Perilaku Karyawan dilakukan melalui penyelidikan yang mendalam dan didasari fakta-fakta yang dapat dipertanggungjawabkan;
3. Direksi dan Dewan Komisaris memutuskan tindakan pembinaan, sanksi disiplin dan/atau tindakan perbaikan serta pencegahan yang harus dilaksanakan oleh atasan langsung di lingkungan masing-masing;

Efforts to Implement and Enforce Code of Conduct

Organizational Implementation and Enforcement

1. The Board of Commisioners, supported by the Nomination and Remuneration Committee, is responsible for the compliance of the Code of Conduct within the Bank;
2. The Board of Directors, assisted by the Human Capital Mangement & General Affair Division, is responsible for the implementation of Code of Conduct within the Bank;
3. The Head of Division, Manager, and managerial levels are responsible for the implementation of Code of Conduct in their respective Divison/Unit;
4. The Board of Directors appoints Head of Human Capital Management & General Affair Division including its personnel to be the whistleblower in any violation against the Code of Conduct; and
5. It is mandatory for each and every employee to read the Code of Conduct trhough intranet and sign the statement letter to declare that the respectiver person has read, understood, and agreed to comply with the Code of Conduct, which thereafter documented by the Human Capital Management & General Affair Division.

Enforcement of Code of Conduct

1. Each of the Bank's employee must report each fact of violation against Employee's Code of Conduct to the Human Capital Management & General Affair Division and the identity of the whistleblower will be protected;
2. Human Capital Management & General Affair Division will follow up each report to and submit the assessment result to the Board of Directors and/or Board of Commissioners according to the scope of responsibility. Such violation against Employee's Code of Conduct will be handled by in-depth investigation based on accountable facts;
3. The Board of Directors and Board of Commissioners will decide on a directional action, disciplinary sanction and/or correctional action and to come up with prevention to be implemented by the direct supervisor in the respective scope;

4. Pemberian sanksi bagi pelaku penyimpangan Pedoman Kode Etik Perilaku Karyawan; dan
5. Bank memiliki pertimbangan dan hak apabila karyawan melanggar Kode Etik/Peraturan Perusahaan/sistem prosedur dengan memberikan langsung surat peringatan ketiga kepada karyawan yang dinilai melakukan penyimpangan berat tanpa perlu surat peringatan pertama dan surat peringatan kedua.

4. The imposition of sanction for the party violating the Employee's Code of Conduct; and
5. The Bank maintains its discretion and right, in the event an employee violates the Code of Conduct/ Company Regulations/Procedures, by directly giving third warning letter to the relevant employee who is deemed of conducting serious violation without first giving first and second warning letter.

Bentuk Pelanggaran dan Jenis Sanksi

Pelanggaran atau ketidakpatuhan terhadap Kode Etik akan dikenai sanksi sesuai tingkat pelanggarannya. Pemberian sanksi akan disesuaikan dengan jenis dan keseriusan pelanggaran serta evaluasi individu yang melanggar yang diuraikan sebagai berikut:

1. Pelanggaran Ringan
   a. Kejadian pertama, minimal teguran lisan dan maksimal surat peringatan pertama;
   b. Kejadian kedua, minimal surat peringatan kedua dan maksimal surat peringatan ketiga; dan
   c. Kejadian ketiga dan seterusnya minimal surat peringatan ketiga dan maksimal pengunduran diri.
2. Pelanggaran Sedang
   a. Kejadian pertama minimal surat peringatan pertama dan maksimal surat peringatan kedua; dan
   b. Kejadian kedua, minimal surat peringatan kedua dan maksimal pengunduran diri.
3. Pelanggaran Berat
   Kejadian pertama, minimal tidak diberikan kenaikan gaji dan maksimal pengunduran diri.

Pemberian sanksi bagi karyawan yang melanggar Kode Etik juga dilakukan sesuai dengan aturan kepegawaian yang berlaku. Sedangkan, pemberian sanksi bagi Dewan Komisaris dan Direksi yang melanggar Kode Etik dilakukan sesuai dengan ketentuan pada Anggaran Dasar Bank dan keputusan RUPS.

Forms and Types of Sanction

Violation or non-compliance with the Code of Conduct will be subject to sanctions according to the violation level. The imposition of sanctions will be adjusted to the type and seriousness of the violation as well as the evaluation of the individual committed the violation, which is described as follows:

1. Minor Violation
   a. First incident, verbal reprimand at minimum and first warning letter at maximum;
   b. Second incident, second warning letter at minimum and third warning letter at maximum; and
   c. Third incident and so on, third warning letter at minimum and resignation at maximum.
2. Moderate Violation
   a. First incident, first warning letter at minimum and second warning letter at maximum; and
   b. Second incident, second warning letter at minimum and resignation at maximum.
3. Severe Violation
   First incident, no salary increments at minimum and resignation at maximum.

Employees committing violations will also be sanctioned according to the applicable employment regulations. Whereas, sanctions against the Board of Commissioners and Board of Directors will be according to the provisions of the Bank's Articles of Association and the GMS resolutions.

Laporan Penyimpangan Internal Tahun 2023

Internal Deviation Report in 2023

Bentuk Pelanggaran Forms Violation	Surat Peringatan Warning Letter	Surat Teguran Reprimand Letter
Ringan / Minor	15	13
Sedang / Moderate	3	-
Berat / Severe	-	-
Total	**18**	**13**

Trend Kualitas Penerapan Kode Etik

Kualitas penerapan Kode Etik di Bank Victoria telah berjalan cukup baik. Karyawan Bank Victoria telah mematuhi seluruh peraturan yang tercantum dalam Kode Etik.

Trend on Quality of Code of Conduct Implementation

The quality of Code of Conduct implementation at Bank Victoria has been running quite well. Bank Victoria's employees have complied with all regulations set out in the Code of Conduct.

Program Kepemilikan Saham oleh Manajemen dan Karyawan
Management/Employee Stock Ownership Program

Di tahun 2023, Bank Victoria tidak melaksanakan program kepemilikan saham oleh manajemen (MSOP) dan/atau program kepemilikan saham oleh karyawan (ESOP).

In 2023, Bank Victoria did not conduct a management stock ownership program (MSOP), and/or an employee stock ownership program (ESOP).

Kebijakan Pengungkapan Informasi
Information Disclosure Policy

Anggota Dewan Komisaris dan Direksi wajib melaporkan kepemilikan dan perubahan kepemilikan saham Bank kepada Otoritas Jasa Keuangan sesuai Peraturan Otoritas Jasa Keuangan No. 11/POJK.04/2017. Laporan wajib disampaikan dalam waktu maksimal 10 (sepuluh) hari sejak terjadinya perubahan. Selain laporan kepada Otoritas Jasa Keuangan, anggota Dewan Komisairs dan Direksi juga harus memberikan informasi kepada Bank mengenai kepemilikan saham dan setiap perubahannya dalam waktu maksimal 3 (tiga) hari kerja setelah terjadinya perubahan.

Members of the Board of Commissioners and Board of Directors are required to submit report on their shareholding and changes on shareholding of the Bank to the Financial Services Authority in accordance with the Financial Services Authority Regulation No. 11/POJK.04/2017. Report is required to be submitted within a maximum of 10 (ten) days from the changes of shareholding. In addition to reporting to the Financial Services Authority, members of the Board of Commissioners and Board of Directors are also required to provide information to the Bank regarding their shareholding and changes on shareholding within a maximum of 3 (three) working days after the changes on shareholding.

Pengungkapan Kepemilikan Saham

Informasi kepemilikan saham Dewan Komisaris dan Direksi dapat dilihat pada bab Profil Perusahaan.

Disclosure of Share Ownership

Information on the Board of Commissioners and Board of Directors' shareholding can be seen in the Company Profile chapter.

Kebijakan Anti Korupsi [POJK F.1]
Anti Corruption Policy

Bank Victoria memiliki kebijakan pencegahan korupsi yang tertuang dalam Keputusan Direksi No. 002/SK-DIR/08/20 tanggal 7 Agustus 2020 tentang Kebijakan dan Standar Operasional Prosedur Penerapan Strategi *Anti Fraud*. Implementasi kebijakan anti korupsi di Bank dilakukan melalui serangkaian kegiatan berikut:

Bank Victoria has a policy on preventing corruption as stated in the Board of Directors' Decision Letter No. 002/SK-DIR/08/20 dated 7 August 2020 on Policy and Standard Operating Procedure for Anti Fraud Strategy Implementation. The Bank applies ant corruption policy through a series of the following activities:

1. Pencegahan Benturan Kepentingan
   Guna menghindari benturan kepentingan dalam melaksanakan segala aktivitas yang terkait dengan Bank, seluruh karyawan Bank berpedoman pada Kode Etik Perilaku Karyawan.
2. Pemberian dan Penerimaan Hadiah atau Donasi
   Kebijakan Bank terkait pemberian dan penerimaan hadiah atau donasi, sebagai berikut:
   a. Dilarang meminta atau memberi isyarat yang mengesankan suatu permintaan berupa uang, barang, tip, komisi, atau surat apapun kepada nasabah atau calon nasabah;
   b. Dilarang menerima pemberian dari nasabah atau calon nasabah baik berupa uang, barang, tip, komisi, atau sesuatu apapun yang dapat menyebabkan utang budi karyawan kepada nasabah, sehingga dapat memengaruhi karyawan dalam mengambil keputusan objektif bila terjadi masalah antara Bank dengan nasabah;
   c. Karyawan dilarang menggunakan fasilitas atau jasa yang ditawarkan oleh nasabah atau calon nasabah karena hubungan baik yang telah dibina, untuk kepentingan pribadi atau keluarga yang dapat menimbulkan benturan kepentingan pada tugas karyawan; dan
   d. Karyawan dilarang menerima penjamuan (hiburan) yang berlebihan dari pihak nasabah. Demikian pula karyawan dilarang mengadakan penjamuan berlebihan yang dapat menimbulkan citra negatif di masyarakat terhadap nama baik Bank dan nama baik karyawan yang bersangkutan.

1. Prevention of Conflict of Interest
   To avoid conflicts of interest in carrying out all activities related to the Bank, all employees must refer to the Employee's Code of Conduct.
2. Giving and Receiving Gifts or Donations
   The Bank's policies with regards to giving and receiving gifts or donations are as follows:
   a. It is prohibited to ask or give an impression of requesting for money, goods, tips, commissions, or any letter to a customer or prospective customer;
   b. It is prohibited to receive gifts from customers or prospective customers in the form of money, goods, tips, commissions, or anything that can cause employees' debt of deeds to customers, that may influence the employees in making objective decisions in the event of a problem between the Bank and the customer;
   c. It is prohibited to use facilities or services offered by customers or prospective customers due to the good relationships that have been fostered, for personal or family interests that can cause conflicts of interest in the employees' duties; and
   d. It is prohibited to accept excessive entertainment from the customer. Likewise, employees are not permitted to hold excessive entertainment that can create a negative image in the community on the Bank's reputation and the employee's reputation.

Sosialisasi Kebijakan Anti Korupsi

Sosialisasi kebijakan anti-korupsi Bank kepada seluruh karyawan dilakukan melalui berbagai kegiatan dan media internal. Hal ini bertujuan untuk meningkatkan kesadaran karyawan agar tidak terlibat dalam tindakan korupsi saat melaksanakan tugas dan tanggung jawabnya. Pada tahun 2023, Bank telah mengikutsertakan karyawan Bank dalam program pendidikan dan pelatihan terkait pelatihan/sosialisasi anti korupsi sebanyak 5 (lima) kali.

Dissemination of Anti Corruption Policy

Dissemination of the Bank's anti corruption policy to all employees is carried out through various activities and internal media. This aims to increase employee awareness so as not to be involved in acts of corruption when carrying out their duties and responsibilities. In 2023, the Bank has included Bank employees in education and training programs related to anti-corruption training/socialization 5 (five) times.

Pengendalian Gratifikasi [POJK F.1]
Gratification Control

Bank Victoria memiliki kebijakan pengendalian gratifikasi yang diatur dalam Kode Etik, di mana Dewan Komisaris, Direksi, Pejabat Eksekutif, Pimpinan Kantor, seluruh karyawan Bank, dan anggota keluarganya tidak diizinkan menerima pemberian dari nasabah, baik secara langsung maupun tidak langsung. Kebijakan ini bertujuan meningkatkan akuntabilitas dan mempertahankan nilai perusahaan sebagai Bank yang bersih dari korupsi, kolusi, dan nepotisme.

Bank Victoria has a policy on gratification control regulated under the Code of Conduct, in which the Board of Commissioners, Board of Directors, Executive Officers, Office Heads, and all Bank employees, including their family members, are not permitted to receive any gratification from customers, either directly or indirectly. This policy aims to increase accountability and maintain the company's value as a Bank that is free from corruption, collusion, and nepotism.

Pengelolaan Pengendalian Gratifikasi

Dewan Komisaris, Direksi, Pejabat Eksekutif, Pimpinan Kantor, dan karyawan Bank Victoria serta anggota keluarganya yang mendapatkan gratifikasi/parsel dalam bentuk apapun wajib mengisi formulir penerimaan gratifikasi/parsel dan menyerahkannya kepada Divisi SKAI & *Anti Fraud* untuk ditindaklanjuti.

Management of Gratification Control

The Board of Commissioners, Board of Directors, Executive Officers, Office Heads, and employees of Bank Victoria including their family members who receive any gratification/parcel in any form whatsoever are obliged to complete gratification/parcel form and submit it to the SKAI & Anti Fraud Division for follow up.

Sosialisasi Kebijakan Pengendalian Gratifikasi

Sosialisasi terkait pengendalian gratifikasi dilakukan secara berkelanjutan kepada seluruh level organisasi untuk meningkatkan *awareness*. Sosialisasi dilakukan melalui media internal Bank sehingga dapat diakses dengan mudah setiap saat oleh seluruh karyawan Bank.

Dissemination of Gratification Control Policy

Gratification control is disseminated on an ongoing basis to all organizational levels to increase awareness. Dissemination is carried out through the Bank's internal media so that it can be conveniently accessed by all of the Bank's employees.

Laporan Gratifikasi Tahun 2023

Pada tahun 2023, Divisi SKAI & *Anti Fraud* tidak menerima laporan gratifikasi yang mengandung *fraud*.

Gratification Report in 2023

In 2023, the SKAI & Anti Fraud Division did not receive any gratification reports that contained fraud

Kebijakan Pencegahan *Insider Trading* [F.1]
Policy to Prevent Insider Trading

Guna mencegah terjadinya *insider trading,* Kode Etik Bank telah mengatur pencegahan *insider trading*. Dalam pencegahan *insider trading,* Bank menekankan setiap insan Bank dilarang memanfaatkan informasi rahasia Bank yang diperoleh dan diketahuinya untuk kepentingan pribadi maupun pihak lain yang tidak berwenang. Setiap insan Bank juga dilarang menginformasikan rencana-rencana Bank yang belum dipublikasikan kepada pihak lain yang tidak berkepentingan.

To prevent insider trading, the Bank's Code of Conduct has regulated the prevention of insider trading. In preventing insider trading, the Bank emphasizes that all Bank personnel are prohibited from using the Bank's confidential information that they obtain and know for personal interests or those of other unauthorized parties. All Bank personnel are also prohibited from giving information to other unauthorized parties regarding the Bank's plans that are not published yet.

Sistem Pelaporan Pelanggaran [POJK F.1]
Whistleblowing System

Sistem pelaporan pelanggaran (*whistleblowing system*/WBS) merupakan wadah bagi karyawan dan pemangku kepentingan lainnya untuk menyampaikan laporan terkait pelanggaran yang terjadi di dalam aktivitas bisnis. Penerapan sistem tersebut diharapkan dapat mendorong insan Bank untuk bekerja dengan penuh integritas dan berpegang teguh pada nilai dan budaya Bank.

The whistleblowing system (WBS) is a forum for employees and other stakeholders to submit reports regarding violations that occur in business activities. The implementation of this system is expected to encourage Bank personnel to work with integrity and uphold the Bank's values and culture.

Kebijakan Sistem Pelaporan Pelanggaran

Bank Victoria telah menetapkan kebijakan WBS dalam Keputusan Direksi No. 002/SK-DIR/08/20 tentang Kebijakan dan Standar Operasional Prosedur Penerapan Strategi *Anti Fraud* PT Bank Victoria International Tbk. Kebijakan WBS Bank mengatur struktur pengelolaan WBS, mekanisme kerja, mulai dari pelaporan pelanggaran, landasan hukum perlindungan pelapor, perlindungan yang diberikan, serta monitoring dan *review*. Kebijakan WBS juga mengatur kewajiban Tim Pengelola WBS untuk:

1. Melaksanakan program promosi dan sosialisasi secara ekstensif dan intensif supaya pelaksanaan prosedur WBS dapat dipahami dengan benar;
2. Menyelenggarakan tata laksana organisasi sedemikian rupa sehingga laporan pelanggaran yang disampaikan dapat ditangani dengan baik serta terdokumentasi dengan baik, namun kerahasiaan pelapor juga tetap terjamin;
3. Melakukan laporan setiap semester kepada Direksi tentang pelaksanaan program WBS terkait laporan dugaan pelanggaran, meliputi sekurang-kurangnya:
    a. Apakah prosedur WBS dapat diterapkan dengan baik dan mendapatkan sambutan yang positif dari karyawan ataupun para pemangku kepentingan lainnya?
    b. Apakah prosedur WBS cukup efektif dalam melakukan deteksi dini dan pencegahan penyimpangan ataupun pelanggaran?
    c. Apakah terdapat suatu pola pelanggaran tertentu yang sering berulang? Apakah kira-kira penyebabnya?
    d. Saran perbaikan untuk meningkatkan efektivitas penerapan WBS dalam mencapai sasaran penciptaan iklim kerja yang terbuka, tulus, dan bertanggung jawab.

Whistleblowing System Policy

Bank Victoria established a WBS policy in the Board of Directors' Decision Letter No. 002/SK-DIR/08/20 on Policies and Standard Operating Procedures for the Implementation of Anti Fraud Strategy of PT Bank Victoria International Tbk. The Bank's WBS policy governs the WBS management structure, work mechanism, starting from violation reporting, legal basis of whistleblower protection, protection provided, and monitoring and review. The WBS policy also regulates the WBS Managing Team's obligations to:

1. Carry out an extensive and intensive promotion and dissemination program so that the implementation of WBS procedures can be understood correctly;
2. Conduct organizational governance in such a way that the violation report submitted can be handled properly and well documented, but the confidentiality of the reporter is also guaranteed;
3. Conduct a semester report to the Board of Directors on the implementation of WBS program on allegedly infringement reports, which include at least:
    a. Is the WBS procedure properly implemented and gained positive response from employees or other stakeholders?
    b. Is the WBS procedure effective enough in early detection and prevention of irregularities or offenses?
    c. Is there any particular pattern of repeated violations? What are the causes?
    d. Suggestions for improvement to increase the effectiveness of WBS implementation in achieving the objectives of creating an open, sincere, and responsible work climate.

Sosialisasi Kebijakan Sistem Pelaporan Pelanggaran

Bank secara rutin melakukan sosialisasi WBS dan edukasi untuk mencegah *fraud*. Di lingkungan internal, Tim Pengelola WBS melakukan sosialisasi WBS melalui pelatihan dan mengirimkan

Dissemination of Whistleblowing System Policy

The Bank routinely conducts dissemination of WBS and education to prevent fraud. In the internal environment, the WBS Management Team disseminates WBS through training and

e-mail bulanan. Sedangkan di lingkungan eksternal, sosialisasi dilakukan melalui situs web Bank, buletin internal, poster, sosialisasi etika, dan presentasi langsung kepada pihak terkait.

sending monthly e-mails. Meanwhile, in the external environment, dissemination is carried out through the Bank's website, internal bulletin, poster, dissemination of ethics, and direct presentations to the related parties.

Jenis Pelanggaran yang Dapat Dilaporkan

Jenis-jenis pelanggaran yang dapat dilaporkan kepada Tim WBS meliputi namun tidak terbatas pada:

1. Seluruh tindakan melanggar hukum pidana (misalnya: pencurian, penipuan, penggunaan narkoba, dan lain sebagainya);
2. Penyalahgunaan wewenang dalam melayani nasabah, debitur, vendor atau pemasok lainnya (misalnya: penundaan pembayaran tidak beralasan, pemerasan, dan lain sebagainya);
3. Pelanggaran peraturan perbankan yang diatur dalam Undang-Undang tentang Perbankan (misalnya: tidak melaksanakan prinsip kehati-hatian, membuka rahasia nasabah kepada yang tidak berhak, melakukan pencatatan yang tidak benar, meminta uang atas jasa pelayanan perbankan yang dilakukan);
4. Pelanggaran peraturan perpajakan atau aturan pelaporan keuangan perusahaan yang tidak sesuai dengan Pernyataan Standar Akuntansi Keuangan;
5. Perbuatan yang dapat merugikan Bank, baik finansial maupun non-finansial, termasuk menciderai citra Bank;
6. Pelanggaran aturan internal yang dapat menciderai integritas pelaporan perusahaan, baik di bidang keuangan ataupun bidang lainnya; dan
7. Perbuatan yang membahayakan keselamatan dan kesehatan kerja.

Types of Violation that Can Be Reported

Types of violations that can be reported to the WBS Team are including but not limited to:

1. All actions that violate criminal law (e.g. theft, fraud, drug use, etc.);
2. Misuse of authority in serving the customers, debtors, vendors, or other suppliers (e.g. unwarranted payment delays, extortion, etc.);
3. Violation of banking regulations stipulated in Banking Law (for example: not practicing prudent principles, disclosing customers' confidential information to unauthorized parties, making incorrect records, asking for money for the banking services performed);
4. Violations of tax regulations or corporate financial reporting regulations that are not in accordance with the Statement of Financial Accounting Standards;
5. Acts that may harm the Bank, both financially and nonfinancially, including harm the Bank's image;
6. Violations of internal rules that may jeopardize the integrity of the corporate reporting, whether in finance or other fields; and
7. Acts that endanger occupational safety and health.

Cara Penyampaian Laporan Pelanggaran dan Pihak yang Mengelola Pelanggaran

Bank Victoria menerapkan mekanisme WBS, di mana pelapor dapat menyampaikan laporan suatu pelanggaran secara lisan, dengan surat, melalui *e-mail* atau sms kepada Unit Anti *Fraud* pada alamat sebagai berikut:

1. Melalui Surat
   Ditujukan kepada Direktur Utama dan ditembuskan kepada Unit Anti *Fraud* di Graha BIP Lt. 10, Jl. Gatot Subroto Kav. 23, Karet Semanggi, Setiabudi, Jakarta Selatan, Daerah Khusus Ibukota Jakarta 12930.
2. Melalui *E-mail*
   a. Unit Anti *Fraud* apabila terlapor adalah karyawan dengan alamat *e-mail*: unitantifraud@victoriabank.co.id.
   b. Direktur Utama apabila terlapor adalah anggota Dewan Komisaris dengan alamat *e-mail* unitantifrauddireksi@victoriabank.co.id.
   c. Dewan Komisaris apabila terlapor adalah anggota Direksi dengan alamat *e-mail* unitantifraudkomisaris@victoriabank.co.id.
3. Melalui telepon atau SMS dengan nomor ke: 081 1870 7649.

Mechanism to Submit Whistleblowing Report and Party Managing the Violations

Bank Victoria implements a WBS mechanism in which reporters can submit reports of a violation orally, by letter, via e-mail or sms to the Anti Fraud Unit at the following address:

1. By Mail
   Addressed to the President Director with a copy to the Anti Fraud Unit at Graha BIP 10th Floor, Jl. Gatot Subroto Kav. 23, Karet Semanggi, Setiabudi, Jakarta Selatan, Daerah Khusus Ibukota Jakarta 12930.
2. By E-mail
   a. Anti Fraud Unit, if the reported party is an employee, at unitantifraud@victoriabank.co.id.
   b. President Director, if the reported party is a member of the Board of Commissioners, at unitantifrauddireksi@victoriabank.co.id.
   c. Board of Commissioners, if the reported party is a member of the Board of Directors, at unitantifraudkomisaris@victoriabank.co.id.
3. By telephone or SMS to: 081 1870 7649.

Perlindungan bagi Pelapor

Manajemen Bank Victoria sangat menyarankan agar pelapor mencantumkan identitas untuk memudahkan Tim *Anti Fraud* dalam melakukan investigasi. Meskipun demikian, kerahasiaan identitas pelapor akan tetap dijaga Tim *Anti Fraud* dan dijamin oleh Dewan Komisaris dan Direksi. Informasi minimal pelapor yang diperlukan adalah alamat surat atau *e-mail*, nomor telepon, atau nomor telepon genggam.

Apabila pelapor merasa terancam setelah melaporkan adanya tindakan pelanggaran, maka dalam hal ini, Bank berkewajiban untuk melakukan perlindungan yang meliputi:

1. Perlindungan fisik, baik terhadap dirinya sendiri maupun keluarganya;
2. Perlindungan terhadap harta benda miliknya dan milik keluarganya atas teror ataupun pembalasan yang harus dialaminya;
3. Perlindungan administratif yang berupa penundaan kenaikan pangkat, pemecatan, pengucilan di tempat kerja, mutasi yang tidak layak, termasuk kepastian kerja dan lainnya; serta
4. Perlindungan hukum dalam proses litigasi di Pengadilan Negeri, termasuk biayanya, dan bila perlu termasuk perlindungan melalui Lembaga Perlindungan Saksi dan Korban.

Protection for Whistleblower

Bank Victoria's management strongly recommends that the whistleblower includes his/her identity in the report to make it easier for the Anti Fraud Team to carry out investigations. Nevertheless, the whistleblower's identity will remain confidential by the Anti Fraud Team, which is guaranteed by the Board of Commissioners and Board of Directors. Information regarding the whistleblower that is needed at least covers the email address, phone number, or mobile phone number.

If the whistleblower feels threated after reporting a violation, then in this case the Bank is obligated to protect the whistleblower which includes:

1. Physical protection, both for the whistleblower and for the family members;
2. Protection for the whistleblower's properties and family members' properties against terror or any retaliation the whistleblower is dealing with;
3. Administrative protection in the form of suspension of promotion, termination, expulsion at work, unreasonable transfer, including work assurance etc.; and
4. Legal protection in the litigation process in the District Court, including the fee and if necessary, including protection through Witness and Victim Protection Agency.

Penanganan Pengaduan

Setiap pengaduan pelanggaran yang masuk akan dikelola oleh Tim *Anti Fraud*, untuk selanjutnya dilakukan investigasi atas kebenaran laporan yang diterima. Jika diketahui bahwa laporan terbukti kebenarannya, maka akan disampaikan kepada Dewan Komisaris dan Direksi untuk menentukan jenis sanksi yang akan diberikan. Sedangkan, laporan yang tidak terbukti keakuratannya, maka laporan tersebut akan diabaikan dan disisihkan sebagai laporan yang tidak perlu ditindaklanjuti. Bank juga tidak akan memberikan sanksi kepada pelapor apabila laporannya tidak terbukti setelah melalui penyelidikan yang dilakukan oleh Tim *Anti Fraud*.

Complaint Handling

Any incoming violation complaint will be managed by the Anti Fraud team, to further be investigated for its truth. In the event that the report is proven to be true, it will be submitted to the Board of Commissioners and Board of Directors to determine the type of sanction to be imposed. Whereas, complaint that is proven inaccurate will be ignored and set aside as a report that does need to be followed-up. The Bank will not impose any sanction to whistleblower of a report that is not proven true after an investigation is carried out by the Anti Fraud Team.

Laporan Pelanggaran Tahun 2023 dan Tindak Lanjutnya

Sepanjang tahun 2023, tidak terdapat penyimpangan atau kecurangan proses kerja dan kegiatan operasional Bank, baik yang dilakukan oleh Dewan Komisaris, Direksi, maupun karyawan Bank.

Whistleblowing Report in 2023 and Its Follow Up

Throughout 2023, there were no irregularities or fraud in the Bank's work processes and operational activities, whether committed by the Board of Commissioners, Board of Directors, or Bank employees.

Akses Informasi dan Data Perusahaan
Access to Company's Information and Data

Bank berkomitmen untuk memberikan kemudahan akses informasi kepada masyarakat, Pemegang Saham, ataupun pemangku kepentingan lainnya. Informasi tersebut dapat diakses melalui:

Corporate Secretary
Gedung Graha BIP Lt. 10
Jl. Gatot Subroto Kav. 23
Jakarta Selatan 12930
T : (021) 522 8888
F : (021) 522 8777
E : corsec@victoriabank.co.id
W : www.victoriabank.co.id

Situs Web

Publik dapat dengan mudah mengakses situs web Bank untuk mendapatkan informasi keuangan dan non-keuangan, termasuk produk/fasilitas, laporan-laporan wajib, dan peluang karier di Bank. Situs web Bank juga menyediakan saluran informasi terkait dengan Bank Victoria, meliputi:

1. *Call center* : 1500977
2. *E-mail* : costumercare@victoriabank.co.id
3. Facebook : @BankVictoriaID
4. Youtube : Bank Victoria
5. Instagram : @bankvictoria

Media Elektronik

Bank menggunakan media elektronik seperti situs web dan *e-mail* (corsec@victoriabank.co.id) untuk menyampaikan informasi yang relevan, termasuk Laporan Tahunan. Pemangku kepentingan dapat mendaftarkan identitas dan alamat *e-mail* pada *mailing list* melalui situs web Bank (www.victoria.co.id) untuk mendapatkan informasi secara berkala.

Siaran Pers

Bank Victoria menggunakan *article placement* untuk menginformasikan kegiatan terkait kinerja dan kegiatan lainnya. Selama tahun 2023, Bank Victoria telah menerbitkan *article placement* sebanyak 17 (tujuh belas) artikel.

The Bank is committed to providing easy access to information for the public, Shareholders, and other stakeholders. This information can be accessed through:

Corporate Secretary
Graha BIP Building 10th Floor
Jl. Gatot Subroto Kav. 23
South Jakarta 12930
T : (021) 522 8888
F : (021) 522 8777
E : corsec@victoriabank.co.id
W : www.victoriabank.co.id

Website

The public can easily access the Bank's website to obtain financial and non-financial information, including products/facilities, mandatory reports, and career opportunities at the Bank. The Bank's website also provides information channels related to Bank Victoria, including:

1. Call center : 1500977
2. E-mail : costumercare@victoriabank.co.id
3. Facebook : @BankVictoriaID
4. Youtube : Bank Victoria
5. Instagram : @bankvictoria

Electronic Media

The Bank uses electronic media such as website and email (corsec@victoriabank.co.id) to deliver relevant information, including Annual Reports. Stakeholders can register their identity and email address on the mailing list via the Bank's website (www.victoria.co.id) to regularly receive information.

Press Release

Bank Victoria uses article placements to inform performance-related activities and other activities. In 2023, Bank Victoria issued 17 (seventeen) article placements.

Buletin

Bank Victoria menerbitkan buletin bernama Victoria News sebagai media untuk menyampaikan informasi kepada pemangku kepentingan. Selama tahun 2023, Victoria News telah menebitkan konten sebanyak 24 (dua puluh empat) kali.

Bulletin

Bank Victoria issued a bulletin called Victoria News as a medium for delivering information to stakeholders. In 2023, Victoria News published content 24 (twenty-four) times.

Implementasi Tata Kelola Perusahaan Terbuka
Implementation of Corporate Governance of Public Company

Penerapan GCG Bank telah disesuaikan dengan Peraturan Otoritas Jasa Keuangan No. 21/POJK.04/2015 dan Surat Edaran Otoritas Jasa Keuangan No. 32/SEOJK.04/2015, sebagaimana diungkapkan berikut:

The Bank's GCG implementation has been adjusted to the Financial Services Authority Regulation No. 21/POJK.04/2015 and Financial Services Authority Circular No. 32/SEOJK.04/2015, as stated below:

Aspek 1: Hubungan Perusahaan Terbuka dengan Pemegang Saham dalam Menjamin Hak-Hak Pemegang Saham
Aspect 1: Relationship between the Public Company and Shareholders in Guaranteeing the Shareholders' Rights

Prinsip 1: Meningkatkan Nilai Penyelenggaraan RUPS. Principle 1: Increasing the Value of Convening GMS.	
REKOMENDASI 1	**RECOMMENDATION 1**
Perusahaan terbuka memiliki cara atau prosedur teknis pengumpulan suara *(voting)*, baik secara terbuka maupun tertutup yang mengedepankan independensi, dan kepentingan Pemegang Saham.	The public company has technical voting methods or procedures, either open or close, prioritizing independence, and interest of Shareholders.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Bank memiliki prosedur pengumpulan suara dalam RUPS yang diatur dalam Anggaran Dasar.	**Complied** The Bank has procedures for voting at the GMS which are regulated in the Articles of Association.
REKOMENDASI 2	**RECOMMENDATION 2**
Seluruh anggota Direksi dan anggota Dewan Komisaris perusahaan terbuka hadir dalam RUPS Tahunan.	All members of Board of Directors and members of Board of Commissioners of the public company attend the Annual GMS.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Seluruh anggota Dewan Komisari dan Direksi hadir dalam RUPS Tahunan 2023.	**Complied** All members of Board of Commissioners and Board of Directors attended the 2023 Annual GMS.
REKOMENDASI 3	**RECOMMENDATION 3**
Ringkasan risalah RUPS tersedia dalam situs web perusahaan terbuka paling sedikit selama 1 (satu) tahun.	Summary of GMS minutes is available on the public company's website for at least 1 (one) year.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Situs web Bank Victoria telah memuat ringkasan RUPS selama lebih dari 1 (satu) tahun.	**Complied** Bank Victoria website has posted a summary of the GMS for more than 1 (one) year.

Prinsip 2: Meningkatkan Kualitas Komunikasi Perusahaan Terbuka dengan Pemegang Saham atau Investor. Principle 2: Increasing the Communication Quality between the Public Company and Shareholders or Investors.	
REKOMENDASI 4	**RECOMMENDATION 4**
Perusahaan terbuka memiliki suatu kebijakan komunikasi dengan Pemegang Saham atau investor.	The public company has communication policy with the Shareholders or investors.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Bank telah menetapkan kebijakan komunikasi dengan Pemegang Saham atau investor sesuai dengan Anggaran Dasar Bank yang terkait dengan RUPS.	**Complied** The Bank has established a policy on communication with Shareholders or investors in accordance with the Bank's Articles of Association related to the GMS.
REKOMENDASI 5	**RECOMMENDATION 5**
Perusahaan terbuka mengungkapkan kebijakan komunikasi perusahaan terbuka dengan Pemegang Saham atau investor dalam situs web.	The public company discloses its policy on communication with Shareholders or investors on the website.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Bank telah memiliki kebijakan komunikasi dalam rangka transparansi dan memberikan kesetaraan informasi kepada Pemegang Saham atau investor yang dapat diakses pada situs resmi Bank www.victoriabank.co.id bagian Hubungan Investor.	**Complied** The Bank already has a communication policy in order to be transparent and provide information equality to Shareholders or Investors, which can be accessed on the Bank's official website at www.victoriabank.co.id in the Investor Relations section.

Aspek 2: Fungsi dan Peran Dewan Komisaris
Aspect 2: Functions and Roles of the Board of Commissioners

Prinsip 3: Memperkuat Keanggotaan dan Komposisi Dewan Komisaris. Principle 3: Strengthening the Board of Commissioners' Membership and Composition.	
REKOMENDASI 6	**RECOMMENDATION 6**
Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi perusahaan terbuka.	The determination of number of Board of Commissioners' members considers the public company's condition.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Penentuan jumlah anggota Dewan Komisaris telah mempertimbangkan kondisi terkini Bank serta telah memenuhi persyaratan Otoritas Jasa Keuangan.	**Complied** The determination of number of Board of Commissioners' members has considered the Bank's current condition and has met the requirements of the Financial Services Authority.
REKOMENDASI 7	**RECOMMENDATION 7**
Penentuan komposisi anggota Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.	The determination of Board of Commissioners' composition considers the range of expertise, knowledge, and experience required.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Anggota Dewan Komisaris yang menjabat saat ini memiliki keahlian, pengetahuan, dan pengalaman yang dibutuhkan Bank.	**Complied** The current members of Board of Commissioners have expertise, knowledge, and experience required by the Bank.
Prinsip 4: Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris. **Principle 4: Increasing the Quality of Implementation of Board of Commissioners' Duties and Responsibilities.**	
REKOMENDASI 8	**RECOMMENDATION 8**
Dewan Komisaris mempunyai kebijakan penilaian sendiri *(self assessment)* untuk menilai kinerja Dewan Komisaris.	The Board of Commissioners has self-assessment policy to assess the Board of Commissioners' performance.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Kebijakan terkait penilaian sendiri kinerja Dewan Komisaris telah dimuat dalam *BOC Charter.*	**Complied** The policy related to self-assessment of the Board of Commissioners' performance has been set out in the BOC Charter.
REKOMENDASI 9	**RECOMMENDATION 9**
Kebijakan penilaian sendiri *(self assessment)* untuk menilai kinerja Dewan Komisaris, diungkapkan melalui Laporan Tahunan perusahaan terbuka.	The self-assessment policy to assess the Board of Commissioners' performance is disclosed in the public company's Annual Report.

STATUS DAN PENERAPAN	STATUS AND IMPLEMENTATION
Terpenuhi Berdasarkan *BOC Charter,* Dewan Komisaris melaksanakan penilaian sendiri secara konsisten setiap tahun. Uraian terkait pelaksanaan penilaian sendiri Dewan Komisaris telah disampaikan dalam Laporan Tahunan ini.	**Complied** Based on the BOC Charter, the Board of Commissioners consistently performs self-assessment annually. The description regarding the implementation of Board of Commissioners' self-assessment is conveyed in this Annual Report.
REKOMENDASI 10	**RECOMMENDATION 10**
Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan.	The Board of Commissioners has policy related to resignation of the Board of Commissioners' members if involved in financial crime.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Kebijakan terkait pengunduran diri Dewan Komisaris apabila terlibat kejahatan keuangan telah dimuat dalam *BOC Charter.*	**Complied** The policy related to the resignation of the Board of Commissioners if they are involved in financial crimes are contained in the BOC Charter.
REKOMENDASI 11	**RECOMMENDATION 11**
Dewan Komisaris atau Komite yang menjalankan fungsi nominasi dan remunerasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi.	The Board of Commissioners or Committee performing nomination and remuneration functions prepares the succession policy for the nomination process of the Board of Directors' members.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Komite Nominasi dan Remunerasi Bank telah mempunyai kebijakan suksesi dalam proses Nominasi anggota Direksi yang tertuang dalam Kebijakan Sistem Nominasi dan Remunerasi.	**Complied** The Bank's Nomination and Remuneration Committee already has a succession policy for the Nomination process of the Board of Directors' members as stated in the Nomination and Remuneration System Policy.

Aspek 3: Fungsi dan Peran Direksi
Aspect 3: Functions and Roles of the Board of Directors

Prinsip 5: Memperkuat Keanggotaan dan Komposisi Direksi.
Principle 5: Strengthening the Board of Directors' Membership and Composition.

REKOMENDASI 12	RECOMMENDATION 12
Penentuan jumlah anggota Direksi mempertimbangkan kondisi perusahaan terbuka, serta efektivitas dalam pengambilan keputusan.	The determination of number of Board of Directors' members considers the public company's condition and effectiveness in decision-making.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Penentuan jumlah anggota Direksi telah mempertimbangkan kondisi terkini Bank serta telah memenuhi persyaratan Otoritas Jasa Keuangan.	**Complied** The determination of number of Board of Directors' members has considered the Bank's current condition and has met the requirements of the Financial Services Authority.
REKOMENDASI 13	**RECOMMENDATION 13**
Penentuan komposisi anggota Direksi memperhatikan, keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.	The determination of Board of Directors' composition considers the range of expertise, knowledge, and experience required.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Anggota Direksi yang menjabat saat ini memiliki keahlian, pengetahuan, dan pengalaman yang dibutuhkan Bank.	**Complied** The current members of Board of Directors have the expertise, knowledge, and experience required by the Bank.
REKOMENDASI 14	**RECOMMENDATION 14**
Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi.	The Board of Directors' member in charge of accounting or finance has the expertise and/or knowledge in accounting.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Anggota Direksi yang membawahi bidang akuntansi atau keuangan telah memiliki keahlian dan/atau pengetahuan di bidang akuntansi.	**Complied** The Board of Directors' member in charge of accounting or finance already has the expertise and/or knowledge in accounting.

Prinsip 6: Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Direksi. Principle 6: Increasing the Quality of Implementation of Board of Directors' Duties and Responsibilities.	
REKOMENDASI 15	**RECOMMENDATION 15**
Direksi mempunyai kebijakan penilaian sendiri *(self assessment)* untuk menilai kinerja Direksi.	The Board of Directors has self-assessment policy to assess the Board of Directors' performance.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Kebijakan terkait penilaian sendiri kinerja Direksi telah dimuat dalam *BOD Charter.*	**Complied** The policy related to self-assessment of the Board of Directors' performance has been set out in the BOD Charter.
REKOMENDASI 16	**RECOMMENDATION 16**
Kebijakan penilaian sendiri *(self assessment)* untuk menilai kinerja Direksi diungkapkan melalui laporan tahunan perusahaan terbuka.	The self-assessment policy to assess the Board of Directors' performance is disclosed in the public company's Annual Report.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Berdasarkan *BOD Charter,* Direksi melaksanakan penilaian sendiri secara konsisten setiap tahun. Uraian terkait pelaksanaan penilaian sendiri Direksi telah disampaikan dalam Laporan Tahunan ini.	**Complied** Based on the BOD Charter, the Board of Directors consistently performs the self-assessment annually. The description regarding the implementation of Board of Directors' self-assessment is conveyed in this Annual Report.
REKOMENDASI 17	**RECOMMENDATION 17**
Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan.	The Board of Directors has policy related to resignation of the Board of Directors' members if involved in financial crime.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Kebijakan terkait pengunduran diri Direksi apabila terlibat kejahatan keuangan telah dimuat dalam *BOD Charter.*	**Complied** The policy related to the resignation of Board of Directors if they are involved in financial crimes are contained in the BOD Charter.

Aspek 4: Partisipasi Pemangku Kepentingan
Aspect 4: Stakeholders Participation

Prinsip 7: Meningkatkan Aspek Tata Kelola Perusahaan melalui Partisipasi Pemangku Kepentingan. Principle 7: Increasing the Corporate Governance Aspect through Stakeholders Participation.	
REKOMENDASI 18	**RECOMMENDATION 18**
Perusahaan terbuka memiliki kebijakan untuk mencegah terjadinya *insider trading*.	The public company has a policy to prevent the occurrence of insider trading.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Kebijakan untuk mencegah *insider trading* telah dimuat dalam Kode Etik.	**Complied** Policy to prevent insider trading is set out in the Code of Conduct.
REKOMENDASI 19	**RECOMMENDATION 19**
Perusahaan terbuka memiliki kebijakan anti korupsi dan *anti fraud.*	The public company has anti-corruption and anti fraud policy.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Kebijakan tentang anti korupsi dan *anti fraud* telah dimuat dalam Kode Etik.	**Complied** Policy on anti corruption and anti fraud is set out in the Code of Conduct.
REKOMENDASI 20	**RECOMMENDATION 20**
Perusahaan terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor.	The public company has a policy on selection and improvement of supplier's or vendor's capabilities.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor Bank diatur dalam Surat Keputusan Direktur No. 143/SK-DIR/06/14 tanggal 24 Juni 2014 tentang Penambahan dan Perubahan Kebijakan dan Prosedur *General Affair*.	**Complied** Policy on selection and improvement of the Bank's supplier's or vendor's capabilities is stipulated under the Board of Directors' Decision Letter No. 143/SK-DIR/06/14 dated 24 June 2014 on Additions and Changes to Policy and Procedure of General Affair.

REKOMENDASI 21	RECOMMENDATION 21
Perusahaan terbuka memiliki kebijakan tentang pemenuhan hak-hak kreditur.	The public company has a policy on the fulfillment of creditor's rights.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Kebijakan tentang pemenuhan hak-hak kreditur telah dimuat dalam Kode Etik.	**Complied** Policy on the fulfillment of creditor's rights is set out in the Code of Conduct.
REKOMENDASI 22	**RECOMMENDATION 22**
Perusahaan terbuka memiliki kebijakan sistem WBS.	The public company has a policy on WBS system.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Bank telah memutakhirkan Kebijakan dan Standar Operasional Prosedur Penerapan *Anti Fraud* serta Penerapan *Whistleblowing System* melalui Keputusan Direksi No. 002/SK-DIR/08/20 tanggal 7 Agustus 2020 tentang Kebijakan dan Standar Operasional Prosedur Penerapan Strategi *Anti Fraud* PT Bank Victoria International Tbk.	**Complied** The Bank has updated the Policy and Standard Operating Procedure for the Implementation of Anti Fraud and Whistleblowing System through the Board of Directors' Decision Letter No. 002/SK-DIR/08/20 dated 7 August 2020 on Policy and Standard Operating Procedure for Anti Fraud Strategy Implementation of PT Bank Victoria International Tbk.
REKOMENDASI 23	**RECOMMENDATION 23**
Perusahaan terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan.	The public company has a policy on provision of long-term incentive for the Board of Directors and employees.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Bank memberlakukan insentif jangka panjang kepada Direksi dan karyawan sesuai dengan Keputusan Direksi No. 001A/SK-DIR/12/22 tanggal 1 Desember 2022 tentang Kebijakan dan Prosedur *Human Capital Management*. Informasi terkait pemberian insentif ini terdokumentasi dalam catatan Laporan Keuangan, khususnya terkait Liabilitas Imbalan Kerja, yang terlampir dalam Laporan Tahunan ini.	**Complied** The Bank applies long-term incentives to the Board of Directors and employees in accordance with the Board of Directors Decree No. 001A/SK-DIR/12/22 dated 1 December 2022 on Human Capital Management Policies and Procedures. Information related to the provision of incentives is documented in the notes to Financial Statements, particularly related to Employee Benefits Obligation as enclosed to this Annual Report.

Aspek 5: Keterbukaan Informasi
Aspect 5: Information Disclosure

Prinsip 8: Meningkatkan Pelaksanaan Keterbukaan Informasi.
Principle 8: Increasing the Implementation of Information Disclosure.

REKOMENDASI 24	RECOMMENDATION 24
Perusahaan terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs web sebagai media keterbukaan informasi.	The public company utilizes information technology more broadly, in addition to the website, as a media for information disclosure.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Platform media sosial, IDX Net, dan Sistem Pelaporan Otoritas Jasa Keuangan dimanfaatkan dengan baik oleh Bank sebagai sarana penyampaian informasi bagi para pemangku kepentingan.	**Complied** Social media platforms, IDX Net, and the Financial Services Authority Reporting System are properly utilized by the Bank as a means of delivering information to stakeholders.
REKOMENDASI 19	**RECOMMENDATION 19**
Laporan Tahunan perusahaan terbuka mengungkapkan pemilik manfaat akhir dalam kepemilikan saham perusahaan terbuka paling sedikit 5%, selain pengungkapan pemilik manfaat akhir dalam kepemilikan saham perusahaan terbuka melalui Pemegang Saham Utama dan Pengendali.	The public company's Annual Report discloses the ultimate beneficial owner of the public company's share ownership of at least 5%, in addition to the disclosure of the ultimate beneficial owner in the share ownership of public company through the Main and Controlling Shareholders.
STATUS DAN PENERAPAN	**STATUS AND IMPLEMENTATION**
Terpenuhi Informasi terkait pemilik manfaat terakhir Bank diungkapkan pada bagian Profil Perusahaan dalam Laporan Tahunan ini.	**Complied** Information related to the Bank's ultimate beneficial owner is disclosed in the Company Profile section of this Annual Report.

Pedoman Umum Governansi Korporat Indonesia
General Guidelines for Indonesian Corporate Governance

Bank Victoria menerapkan prinsip dan rekomendasi PUGKI 2021 berdasarkan pendekatan "terpenuhi atau penjelasan" dengan rincian implementasi sebagai berikut:

Bank Victoria applies the principles and recommendations of the 2021 PUGKI (General Guidelines for Indonesian Corporate Governance) based on the "complied or explanation" approach with details of its implementation as follows:

Prinsip 1: Peran dan Tanggung Jawab Direksi dan Dewan Komisaris
Principle 1: Roles and Responsibilities of the Board of Directors and Board of Commissioners

Rekomendasi 1.1: Peran dan Tanggung Jawab Direksi.
Recommendation 1.1: Roles and Responsibilities of the Board of Directors.

REKOMENDASI 1.1.1:	**RECOMMENDATION 1.1.1:**
Untuk mencapai penciptaan nilai yang berkelanjutan, Direksi menjalankan peran kepemimpinannya dan berupaya mencapai hasil governansi sebagai berikut: 1. Berdaya saing dan berfokus ke kinerja jangka panjang; 2. Beretika dan bertanggung jawab dalam menjalankan bisnis; 3. Berkontribusi positif terhadap masyarakat dan lingkungan; serta 4. Berkemampuan dalam bertahan dan bertumbuh (*corporate resilience*).	To achieve sustainable value creation, the Board of Directors carries out its leadership role and seeks to achieve the following governance results: 1. Be competitive and focused on long-term performance; 2. Be ethical and responsible in conducting business; 3. Have positive contributions to the community and the environment; and 4. Be able to survive and grow (corporate resilience).
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Direksi mewujudkan standar etika bisnis yang tinggi dan memastikan pelaksanaan Kode Etik yang melahirkan budaya korporasi yang berintegritas. Hal ini dilakukan salah satunya dengan menerapkan Nilai Budaya Perusahaan, SQEW (*Safe, Quick, Easy, Warm*).	**Complied** The Board of Directors realizes high standards of business ethics and ensures of that the Code of Conduct implementation creates a corporate culture with integrity. This is done, among others, by implementing the Company's Cultural Values, SQEW (Safe, Quick, Easy, Warm).
REKOMENDASI 1.1.2:	**RECOMMENDATION 1.1.2:**
Direksi harus memastikan bahwa misi, visi, tujuan, sasaran, strategi, dan rencana tahunan dan jangka menengah korporasi konsisten dengan tujuan jangka panjang, dengan memanfaatkan inovasi dan teknologi secara efektif.	The Board of Directors must ensure that the corporate mission, vision, goals, objectives, strategies, and annual as well as mid-term plans are consistent with the long-term goals, by effectively utilizing innovation and technology.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Direksi telah menjadikan optimalisasi penerapan teknologi informasi terkini sebagai salah satu pilar strategi dalam mencapai target bisnis baik jangka pendek maupun jangka panjang.	**Complied** The Board of Directors has made the optimization of the latest information technology application as one of the strategic pillars in achieving both short and long-term business targets.
REKOMENDASI 1.1.3:	**RECOMMENDATION 1.1.3:**
Direksi memastikan bahwa korporasi menerapkan manajemen risiko dan sistem pengendalian internal yang tepat dan efektif yang selaras dengan visi, misi, tujuan, sasaran, dan strategi korporasi serta mematuhi peraturan perundang-undangan dan standar yang berlaku.	The Board of Directors ensures that the corporation implements an appropriate and effective risk management and internal control system, that is aligned with the corporate vision, mission, goals, objectives, and strategies, as well as complies with applicable laws and regulations and standards.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Sistem manajemen risiko dan pengendalian internal Bank senantiasa selaras dengan visi, misi, tujuan, sasaran, dan strategi korporasi serta mematuhi peraturan perundang-undangan dan standar yang berlaku.	**Complied** The Bank's risk management and internal control systems are always aligned with the corporate vision, mission, goals, objectives, and strategies as well as complying with applicable laws and regulations and standards.
REKOMENDASI 1.1.4:	**RECOMMENDATION 1.1.4:**
Direksi memastikan integritas akuntansi dan sistem pelaporan keuangan korporasi dan pengungkapan yang tepat waktu dan akurat atas semua informasi material mengenai korporasi.	The Board of Directors ensures the integrity of corporate accounting and financial reporting system and the timely and accurate disclosure of all material information on the corporation.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Direksi memastikan bahwa setiap orang yang terlibat dalam persiapan dan pengungkapan informasi korporasi memiliki kemampuan dan latar belakang yang memadai untuk menjalankan pekerjaannya. Direksi juga bertanggung jawab atas dan melakukan publikasi Laporan Keuangan Triwulanan di situs web Bank dan media massa sesuai peraturan yang berlaku.	**Complied** The Board of Directors ensures that everyone involved in the preparation and disclosure of corporate information has adequate skills and background to perform the work. The Board of Directors is also responsible for and publishes the Quarterly Financial Statements on the Bank's website and mass media in accordance with applicable regulations.
REKOMENDASI 1.1.5:	**RECOMMENDATION 1.1.5:**
Direksi memastikan pelaporan keberlanjutan telah disusun sebagaimana mestinya.	The Board of Directors ensures that sustainability reporting has been prepared properly.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Direksi beserta jajaran manajemen telah memastikan Laporan Keberlanjutan disusun berdasarkan kerangka pelaporan yang sesuai dengan ukuran dan kompleksitas korporasi dan memenuhi standar nasional.	**Complied** The Board of Directors and the management have ensured that the Sustainability Report is prepared based on a reporting framework that is appropriate to the corporate size and complexity and meets national standards.
REKOMENDASI 1.1.6:	**RECOMMENDATION 1.1.6:**
Direksi membangun kerangka kerja untuk governansi teknologi informasi korporasi yang selaras dengan kebutuhan dan prioritas bisnis korporasi, mendorong peluang dan kinerja bisnis, memperkuat manajemen risiko, serta mendukung tujuan dan strategi korporasi.	The Board of Directors builds a framework for corporate information technology governance that is aligned with corporate business needs and priorities, drives business opportunities and performance, strengthens risk management, as well as supports corporate goals and strategies.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Strategi dan kerangka kerja governansi TI Bank dijelaskan dengan rinci pada Laporan Tahunan ini. Direksi memastikan bahwa Bank memiliki kebijakan alokasi sumber daya TI yang memadai dan optimal untuk mendukung tujuan dan strategi Bank.	**Complied** The Bank's IT governance strategy and framework are explained in detail in this Annual Report. The Board of Directors ensures that the Bank has adequate and optimal IT resource allocation policies to support the Bank's goals and strategies.
REKOMENDASI 1.1.7:	**RECOMMENDATION 1.1.7:**
Bagi korporasi yang menjalankan kegiatan usaha berdasarkan prinsip syariah, Direksi perlu memastikan kewenangan dan ketersediaan perangkat pendukung yang memadai agar Dewan Pengawas Syariah dapat menjalankan perannya dengan efektif.	For corporations that conduct business activities based on sharia principles, the Board of Directors needs to ensure the authority and availability of adequate supporting tools, allowing the Sharia Supervisory Board to carry out its role effectively.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Penjelasan Di tahun 2023, Bank tidak memiliki dan menjalankan kegiatan usaha berdasarkan prinsip syariah.	**Explanation** In 2023, the Bank did not have and conduct business activities based on sharia principles.
REKOMENDASI 1.1.8:	**RECOMMENDATION 1.1.8:**
Piagam Direksi secara periodik ditinjau. Piagam mencakup antara lain pembagian peran Direktur secara individual dapat diatur di Piagam Direksi atau dengan surat keputusan Direksi.	The Board of Directors' Charter is periodically reviewed. The Charter includes, among others, the division of roles for the Directors individually, which can be regulated in the Board of Directors' Charter or by a decision letter of the Board of Directors.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi *BOD Charter* ditelaah secara berkala dan telah diperbarui pada tanggal 6 Desember 2023 dan diunggah ke situs web Bank (www.victoriabank.co.id).	**Complied** The BOD Charter is reviewed periodically and was updated on 6 December 2023 and uploaded to the Bank's website (www.victoriabank.co.id).
REKOMENDASI 1.1.9:	**RECOMMENDATION 1.1.9:**
Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan.	The Board of Directors has a policy on resignation of members of the Board of Directors if involved in a financial crime and are proven to have made a mistake.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan dituangkan dalam *BOD Charter.*	**Complied** The policy related to the resignation of members of the Board of Directors if involved in financial crimes and proven wrongdoing are outlined in the BOD Charter.

Rekomendasi 1.2: Penilaian Kinerja - Direksi dan Anggotanya. Recommendation 1.2: Performance Assessment - Board of Directors and its Members.	
REKOMENDASI 1.2.1:	**RECOMMENDATION 1.2.1:**
Dewan Komisaris melakukan evaluasi formal tahunan secara objektif dan independen untuk menentukan efektivitas Direksi dan setiap individu Direktur.	The Board of Commissioners conducts an annual formal evaluation objectively and independently to determine the effectiveness of the Board of Directors and each individual Director.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank memiliki kebijakan penilaian terhadap kinerja Direksi yang terdiri dari penilaian kinerja dengan metode penilaian sendiri dan penilaian kinerja oleh Dewan Komisaris yang dilakukan minimum 1 (satu) kali dalam setahun. Penjelasan lebih lengkap disampaikan pada pembahasan Penilaian Kinerja Direksi dalam Laporan Tahunan ini.	**Complied** The Bank has a policy to assess the Board of Directors' performance, consisting of performance assessment with self-assessment method and performance assessment by the Board of Commissioners, conducted at least 1 (one) time a year. A more detailed explanation is provided in the discussion on the Board of Directors' Performance Assessment in this Annual Report.
REKOMENDASI 1.2.2:	**RECOMMENDATION 1.2.2:**
Dewan Komisaris dengan pertimbangan Komite Nominasi dan Remunerasi, bertanggung jawab menentukan kriteria evaluasi kinerja dan menilai kinerja Direktur Utama dan anggota Direksi lainnya.	The Board of Commissioners, with considerations from the Nomination and Remuneration Committee, is responsible for determining performance evaluation criteria and assessing the performance of the President Director and other members of the Board of Directors.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Kriteria penilaian kinerja Direksi oleh Dewan Komisaris telah mempertimbangkan usulan Komite Nominasi dan Remunerasi.	**Complied** The performance assessment criteria of the Board of Directors by the Board of Commissioners have considered the recommendations of the Nomination and Remuneration Committee.

Rekomendasi 1.3: Peran dan Tanggung Jawab Dewan Komisaris. Recommendation 1.3: Roles and Responsibilities of the Board of Commissioners.	
REKOMENDASI 1.3.1:	**RECOMMENDATION 1.3.1:**
Dewan Komisaris mereviu strategi korporasi paling tidak setiap tahun dan menyetujui misi, visi dan strategi korporasi yang dirumuskan oleh Direksi. Dewan Komisaris juga mereviu, memberikan saran dan menyetujui rencana bisnis dan rencana keuangan jangka panjang dan rencana keuangan jangka pendek korporasi. Dewan Komisaris memberikan advis dan melakukan pemantauan kepada Direksi atas pengelolaan implementasinya. Direksi dan Dewan Komisaris terlibat dalam keputusan yang sangat penting bagi korporasi, diatur dalam Anggaran Dasar korporasi.	The Board of Commissioners reviews the corporate strategy at least annually and approves the corporate mission, vision, and strategy formulated by the Board of Directors. The Board of Commissioners also reviews, provides advice, and approves long-term business and financial plans and the company's short-term financial plans. The Board of Commissioners provides advice and monitors the Board of Directors on the management of its implementation. The Board of Directors and Board of Commissioners are involved in decisions deemed crucial for the corporation, as regulated in the Articles of Association of the Company.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Dewan Komisaris bersama Direksi setiap tahun melakukan kajian dan telaah mengenai kesesuaian visi dan misi Bank terhadap strategi, kondisi Bank saat ini dan tantangan usaha yang akan dihadapi ke depan. Dewan Komisaris juga menelaah, memberikan saran, dan menyetujui rencana bisnis dan rencana keuangan jangka panjang dan rencana keuangan jangka pendek Bank dan melakukan pemantauan atas pengelolaan implementasinya oleh Direksi.	**Complied** The Board of Commissioners, together with the Board of Directors, annually conducts studies and reviews on the suitability of the Bank's vision and mission to the strategy, the Bank's current condition, and business challenges to face in the future. The Board of Commissioners also reviews, provides advice, approves business plans, long-term financial plans, and short-term financial plans for the Bank, as well as oversees the management of their implementation by the Board of Directors.
REKOMENDASI 1.3.2:	**RECOMMENDATION 1.3.2:**
Jenis keputusan yang memerlukan persetujuan Dewan Komisaris harus diungkapkan dalam Laporan Tahunan.	The types of decisions that require the Board of Commissioners' approval must be disclosed in the Annual Report.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Keputusan-keputusan yang diambil oleh Dewan Komisaris telah disampaikan pada pembahasan Dewan Komisaris di Laporan Tahunan ini.	**Complied** Decisions taken by the Board of Commissioners have been presented in the discussion of the Board of Commissioners in this Annual Report.

REKOMENDASI 1.3.3:	RECOMMENDATION 1.3.3:
Dengan memperhatikan rekomendasi Komite Nominasi dan Remunerasi, Dewan Komisaris mengusulkan kepada, dan untuk diputuskan oleh, RUPS pengangkatan dan/atau pemberhentian anggota Direksi dan anggota Dewan Komisaris. Dalam mengusulkan hal di atas, Dewan Komisaris memperhatikan keberagaman, unsur non-diskriminatif dan memberikan kesempatan yang sama tanpa membedakan suku, agama, ras, antar golongan dan gender. Dewan Komisaris memastikan proses pencalonan dan pemilihan anggota Direksi dan anggota Dewan Komisaris adalah formal dan transparan.	Taking into account the recommendations from the Nomination and Remuneration Committee, the Board of Commissioners proposes to, and to be resolved by, the GMS the appointment and/or dismissal of members of the Board of Directors and members of the Board of Commissioners. In proposing the above, the Board of Commissioners pays attention to the diversity, non-discriminatory elements, and provides equal opportunities regardless of ethnicity, religion, race, class, and gender. The Board of Commissioners ensures a formal and transparent nomination and selection process for members of the Board of Directors and members of the Board of Commissioners.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Sebagaimana diatur dalam Kebijakan Nominasi Bank No. 003/SK-KOM/09/18 tanggal 20 September 2018, Dewan Komisaris berperan aktif dalam proses pengangkatan dan/atau pemberhentian anggota Dewan Komisaris dan Direksi. Dalam proses nominasi, Dewan Komisaris memperhatikan rekomendasi Komite Nominasi dan Remunerasi; keberagaman dengan memberikan kesempatan yang sama tanpa membedakan suku, agama, ras, antar golongan dan gender; serta dilakukan dengan formal dan transparan.	**Complied** As stipulated in the Bank's Nomination Policy No. 003/SK-KOM/09/18 dated 20 September 2018, the Board of Commissioners plays an active role in the process of appointing and/or dismissing members of the Board of Commissioners and Board of Directors. In the nomination process, the Board of Commissioners takes into account the recommendations of the Nomination and Remuneration Committee; diversity by providing equal opportunities regardless of ethnicity, religion, race, class, and gender; and carries out the nomination in a formal and transparent manner.
REKOMENDASI 1.3.4:	**RECOMMENDATION 1.3.4:**
Dewan Komisaris atau Komite yang menjalankan fungsi nominasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi. Setiap tahun Dewan Komisaris meninjau pelaporan pelaksanaan rencana pengembangan dan suksesi yang disampaikan Direktur Utama.	The Board of Commissioners or the Committee conducting the nomination function prepares a succession policy in the process of nominating members of the Board of Directors. Every year, the Board of Commissioners reviews the report on implementation of development and succession plans submitted by the President Director.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Dalam rangka mempersiapkan regenerasi kepemimpinan, Bank memiliki dan menjalankan kebijakan suksesi Direksi yang merupakan bagian dari Pedoman Kerja Komite Nominasi dan Remunerasi dan telah disampaikan dalam Laporan Tahunan.	**Complied** In order to prepare for leadership regeneration, the Bank has established and implements a succession policy for the Board of Directors, which is part of the Nomination and Remuneration Committee Charter and has been presented in the Annual Report.
REKOMENDASI 1.3.5:	**RECOMMENDATION 1.3.5:**
Dewan Komisaris: 1. Mengajukan kepada RUPS, yang dapat didahului oleh usulan dari komite yang menjalankan fungsi remunerasi, besaran remunerasi anggota Direksi dan anggota Dewan Komisaris yang selaras dengan pengembangan korporasi yang berkelanjutan dan kepentingan jangka panjang korporasi dan Pemegang Saham; serta 2. Secara berkala mereviu sistem remunerasi Direksi dan Dewan Komisaris.	The Board of Commissioners: 1. Submits to the GMS, which may be preceded by recommendation from the committee conducting remuneration function, the remuneration amount for members of the Board of Directors and members of the Board of Commissioners, in line with the sustainable corporate development and long-term interests of the corporation and Shareholders; and 2. Periodically reviews the remuneration system for the Board of Directors and Board of Commissioners.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Komite Nominasi dan Remunerasi melakukan pembahasan atas remunerasi Dewan Komisaris dan Direksi dengan mempertimbangkan skala uaha, kompleksitas usaha, *peer group,* tingkat inflasi, kondisi dan kemampuan keuangan Bank, dan tidak bertentangan dengan peraturan perundang-undangan yang berlaku. Dewan Komisaris akan mempelajari rekomendasi dari Komite Nominasi dan Remunerasi dan mengusulkan remunerasi tersebut kepada RUPS. Selain itu, sistem remunerasi Dewan Komisaris dan Direksi ditelaah secara berkala sesuai perkembangan aktivitas Bank dan ketentuan yang berlaku.	**Complied** The Nomination and Remuneration Committee discusses the remuneration for the Board of Commissioners and Board of Directors by considering the business scale, business complexity, peer group, inflation rate, the Bank's financial condition and capability, and not having any conflict with applicable laws and regulations. The Board of Commissioners will study the recommendations from the Nomination and Remuneration Committee and propose the remuneration to the GMS. In addition, the remuneration system of the Board of Commissioners and Board of Directors is reviewed periodically in accordance with the development of the Bank's activities and applicable regulations.
REKOMENDASI 1.3.6:	**RECOMMENDATION 1.3.6:**
Dewan Komisaris mengawasi efektivitas kebijakan governansi korporat dan implementasinya serta mengusulkan perubahan jika diperlukan.	The Board of Commissioners oversees the effectiveness of corporate governance policies and their implementation and proposes changes if necessary.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Dewan Komisaris baik secara langsung atau melalui komite-komite senantiasa mengawasi dan mengarahkan kebijakan dan efektivitas penerapan tata kelola serta memberikan masukan dan perbaikan jika diperlukan.	**Complied** The Board of Commissioners, either directly or through committees, always supervises and directs the policies and effectiveness of governance implementation and provides input and improvements if necessary.

REKOMENDASI 1.3.7:	RECOMMENDATION 1.3.7:
Dewan Komisaris memantau dan mengarahkan agar korporasi menerapkan manajemen risiko dan sistem pengendalian internal yang tepat dan efektif yang selaras dengan tujuan, sasaran, dan strategi korporasi serta mematuhi peraturan perundang-undangan, kode perilaku, dan standar yang berlaku.	The Board of Commissioners monitors and directs the corporation to implement appropriate and effective risk management and internal control systems that are aligned with the corporate goals, objectives, and strategies, as well as complying with applicable laws and regulations, codes of conduct, and standards.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Dewan Komisaris baik secara langsung atau melalui komite-komite senantiasa mengawasi dan mengarahkan kebijakan dan efektivitas manajemen risiko dan SPI yang dilakukan oleh manajemen.	**Complied** The Board of Commissioners, either directly or through committees, always supervises and directs the policies and effectiveness of risk management and internal control systems carried out by management.
REKOMENDASI 1.3.8:	**RECOMMENDATION 1.3.8:**
Dewan Komisaris mengawasi dan mengarahkan agar tercapai integritas akuntansi dan sistem pelaporan keuangan korporat, serta independensi fungsi audit internal dan eksternal.	The Board of Commissioners supervises and directs the integrity of the corporate accounting and financial reporting system, as well as the independence of internal and external audit functions.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Dewan Komisaris senantiasa memastikan integritas akuntansi dan sistem pelaporan keuangan serta independensi fungsi audit internal dan eksternal yang tercermin melalui pembahasan Komite Audit dan SKAI & *Anti Fraud* di Laporan Tahunan ini.	**Complied** The Board of Commissioners always ensures the integrity of the accounting and financial reporting systems as well as the independence of internal and external audit functions, which are reflected through the discussions on Audit Committee and SKAI & Anti-Fraud in this Annual Report.
REKOMENDASI 1.3.9:	**RECOMMENDATION 1.3.9:**
Dewan Komisaris memantau, mereviu, dan menyetujui Laporan Tahunan dan Laporan Keberlanjutan korporasi serta memastikan integritasnya, serta mengawasi proses pengungkapan dan pengkomunikasian korporasi.	The Board of Commissioners monitors, reviews, and approves the Annual Report and Sustainability Report of the corporation, ensures their integrity, and oversees the corporation's disclosure and communication process.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Penyusunan Laporan Tahunan dan Laporan Keberlanjutan dipantau dan disetujui oleh Dewan Komisaris.	**Complied** The preparation of the Annual Report and Sustainability Report is monitored and approved by the Board of Commissioners.
REKOMENDASI 1.3.10:	**RECOMMENDATION 1.3.10:**
Piagam Dewan Komisaris secara periodik ditinjau.	The Board of Commissioners Charter is periodically reviewed.
STATUS DAN PENERAPAN:	**STATUS AND IMPLEMENTATION:**
Terpenuhi *BOC Charter* dikaji secara berkala dan telah diperbarui pada tanggal 10 Maret 2023 serta diunggah ke situs web Bank (www.victoriabank.co.id).	**Complied** The BOC Charter is periodically reviewed, was lastly updated on 10 March 2023, and is already uploaded to the Bank's website (www.victoriabank.co.id).
REKOMENDASI 1.3.11:	**RECOMMENDATION 1.3.11:**
Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan.	The Board of Commissioners has a policy on resignation of members of the Board of Commissioners if involved in a financial crime and are proven to have made a mistake.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan dituangkan dalam *BOC Charter* terkait Keanggotaan Dewan Komisaris.	**Complied** The policy related to the resignation of members of the Board of Commissioners if involved in financial crimes and proven wrongdoing are outlined in the BOC Charter related to the Membership of the Board of Commissioners.
REKOMENDASI 1.3.12:	**RECOMMENDATION 1.3.12:**
Komisaris independen sangat diharapkan untuk dapat berkontribusi dalam diskusi yang jujur, objektif, aktif, dan konstruktif pada rapat Dewan Komisaris.	Independent commissioners are highly expected to be able to contribute to honest, objective, active, and constructive discussions at the Board of Commissioners' meetings.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Seluruh Komisaris Independen Bank memiliki rekam jejak yang kredibel dan dapat berkontribusi dalam kemajuan Bank.	**Complied** All of the Bank's Independent Commissioners have credible track records and can contribute to the Bank's progress.

REKOMENDASI 1.3.13:	RECOMMENDATION 1.3.13:
Komisaris Utama berperan sebagai koordinator Dewan Komisaris dan memastikan efektivitasnya. Komisaris Utama mendorong budaya keterbukaan dan dialog konstruktif yang memungkinkan berbagai pandangan diungkapkan, termasuk mengoordinasi penetapan agenda rapat dewan yang tepat dan memastikan waktu yang cukup tersedia untuk mendiskusikan semua agenda. Selain itu, juga harus ada kesempatan bagi Dewan Komisaris untuk bertemu dengan jajaran Direksi dan Manajemen Senior.	The President Commissioner acts as the coordinator of the Board of Commissioners and ensures its effectiveness. The President Commissioner promotes a culture of transparency and constructive dialogue that allows a variety of views to be expressed, including coordinating the setting of appropriate board meeting agenda and ensuring sufficient time is available to discuss all agenda items. In addition, there should be opportunities for the Board of Commissioners to meet with the Board of Directors and Senior Management.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Komisaris Utama Independen Bank memiliki tugas dan tanggung jawab di antaranya mengoordinasikan pelaksanaan tugas dan memberikan pengarahan kepada anggota Dewan Komisaris serta memberikan usulan untuk mengadakan rapat. Selain itu, rapat gabungan Dewan Komisaris dan Direksi dilaksanakan secara berkala.	**Complied** The Bank's Independent President Commissioner has duties and responsibilities including coordinating the implementation of duties, providing directions to the Board of Commissioners' members, and providing suggestions to conduct meetings. In addition, joint meetings of the Board of Commissioners and Board of Directors are held regularly.

Rekomendasi 1.4: Pembentukan Komite.
Recommendation 1.4: Establishment of a Committee.

REKOMENDASI 1.4.1:	RECOMMENDATION 1.4.1:
Korporasi memiliki komite-komite di bawah Dewan Komisaris sekurang-kurangnya terdiri dari: Komite Audit, Komite Nominasi dan Remunerasi, dan Komite Pemantau Manajemen Risiko.	The Corporation has committees under the Board of Commissioners, consisting of at least: Audit Committee, Nomination and Remuneration Committee, and Risk Management Monitoring Committee.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Komite-komite di tingkat Dewan Komisaris terdiri dari Komite Pemantau Risiko, Komite Nominasi dan Remunerasi, serta Komite Audit.	Complied Committees under the Board of Commissioners consist of the Risk Monitoring Committee, Nomination and Remuneration Committee, and Audit Committee.
REKOMENDASI 1.4.2:	**RECOMMENDATION 1.4.2:**
Dewan Komisaris memastikan bahwa anggota Komite Audit seluruhnya independen dan komite lain yang dibentuk Dewan Komisaris adalah mayoritas dari pihak independen, serta semua anggota komite memiliki kompetensi, berkomitmen, serta memiliki wewenang yang memadai untuk menjalankan perannya secara efektif dan independen.	The Board of Commissioners ensures that all Audit Committee's members are independent, and majority of members of other committees established by the Board of Commissioners are independent parties, and that all committee members are competent, committed, and have sufficient authority to perform their roles in an effective and independent manner.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Anggota Komite Audit Bank seluruhnya merupakan Komisaris Independen dan pihak independen. Komposisi anggota komite lainnya juga mayoritas merupakan Komisaris Independen dan pihak independen. Hal ini disampaikan lebih detail dalam pembahasan Komite Audit dan komite lainnya masing-masing secara terpisah pada Laporan Tahunan ini.	**Complied** All members of the Bank's Audit Committee are Independent Commissioners and independent parties. The majority of other committees' members are also Independent Commissioners and independent parties. This is presented in more detail in the discussion of Audit Committee and other committees, each separately in this Annual Report.
REKOMENDASI 1.4.3:	**RECOMMENDATION 1.4.3:**
Untuk memastikan pemantauan atas pelaksanaan tugas Komite Audit berjalan objektif dan independen, Komisaris Utama tidak boleh menjadi ketua Komite Audit, kecuali dalam keadaan luar biasa yang harus dijelaskan dalam Laporan Tahunan.	To ensure objective and independent monitoring on the implementation of Audit Committee's duties, the President Commissioner is not allowed to be the chairman of Audit Committee, except in exceptional circumstances which must be explained in the Annual Report.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Penjelasan Ketua Komite Audit dijabat oleh Zaenal Abidin, Ph.D yang merupakan Komisaris Utama. Meski demikian, Zaenal Abidin, Ph.D merupakan Komisaris Utama Independen dan Bank menjamin independensinya dalam melaksanakan tugas dan tanggung jawabnya sebagai Ketua Komite Audit.	**Explanation** The Chairman of Audit Committee is held by Zaenal Abidin, Ph.D, the President Commissioner. Nevertheless, Zaenal Abidin, Ph.D, is an Independent President Commissioner and the Bank guarantees his independence in performing his duties and responsibilities as the Chairman of Audit Committee.

Rekomendasi 1.5: Penilaian Kinerja – Dewan Komisaris dan Anggotanya. Recommendation 1.5: Performance Assessment – Board of Commissioners and its Members.	
REKOMENDASI 1.5.1:	**RECOMMENDATION 1.5.1:**
Dewan Komisaris melakukan evaluasi formal tahunan secara objektif untuk menentukan efektivitas Dewan, komitenya, dan setiap individu Komisaris.	The Board of Commissioners conducts an annual formal evaluation objectively to determine the effectiveness of the Board, its committees, and each individual Commissioner.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Pelaksanaan penilaian kinerja Dewan Komisaris dan komitenya dilakukan setiap tahun (minimum setahun sekali). Penilaian kinerja Dewan Komisaris dan komitenya menggunakan beberapa kriteria sebagaimana yang tertuang dalam Laporan Tahunan ini.	Complied The performance assessment of the Board of Commissioners and its committees is carried out every year (at least once a year). The performance assessment of the Board of Commissioners and its committees uses several criteria as stated in this Annual Report.

Rekomendasi 1.6: Benturan Kepentingan. Recommendation 1.6: Conflict of Interest.	
REKOMENDASI 1.6.1:	**RECOMMENDATION 1.6.1:**
Anggota Direksi yang mempunyai rangkap jabatan di luar korporasi, harus mendapatkan persetujuan dari Dewan Komisaris. Seorang Komisaris memberi tahu Dewan Komisaris dan ketua komite yang menjalankan fungsi nominasi, sebelum menerima penunjukan baru sebagai Direktur atau Komisaris dari korporasi terbuka, jabatan Direktur lainnya atau posisi lain dengan komitmen waktu yang signifikan.	Members of the Board of Directors with concurrent positions outside the corporation must obtain approval from the Board of Commissioners. A Commissioner shall notify the Board of Commissioners and the chairman of committee performing nominating function, prior to accepting a new appointment as Director or Commissioner of a publicly listed corporation, other Director positions, or other positions with a significant time commitment.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Tidak ada anggota Direksi Bank yang mempunyai rangkap jabatan di luar Bank Victoria. Anggota Dewan Komisaris yang menerima penunjukan dari perusahaan terbuka lain wajib menyampaikan informasi tersebut kepada Dewan Komisaris dan/atau Komite Nominasi dan Remunerasi.	**Complied** There are no members of the Bank's Board of Directors with concurrent positions outside Bank Victoria. Members of the Board of Commissioners who receive appointments from other public companies must convey this information to the Board of Commissioners and/or the Nomination and Remuneration Committee.
REKOMENDASI 1.6.2:	**RECOMMENDATION 1.6.2:**
Dewan Komisaris memantau dan mengelola potensi benturan kepentingan manajemen, anggota Direksi, Dewan Komisaris dan Pemegang Saham, termasuk penyalahgunaan aset korporasi dan penyalahgunaan dalam transaksi pihak berelasi. Komisaris yang memiliki benturan kepentingan tidak turut serta dalam pemantauan dan pengambilan keputusan atas potensi benturan kepentingan yang melibatkan Komisaris atau afiliasi Komisaris yang bersangkutan.	The Board of Commissioners monitors and manages potential conflicts of interest within the management, members of the Board of Directors, Board of Commissioners, and Shareholders, including misuse of corporate assets and misuse of related party transactions. Commissioners with conflicts of interest shall not participate in monitoring and making decisions on matters containing potential conflicts of interest involving the Commissioners or affiliates of the Commissioner concerned.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Dewan Komisaris telah memantau dan mengelola potensi benturan kepentingan Bank. Dalam pelaksanaan tugas dan tanggung jawabnya, seluruh anggota Dewan Komisaris berkomitmen untuk menghindari terjadinya potensi benturan kepentingan atau selalu menempatkan diri untuk tidak berada dalam potensi terjadinya benturan kepentingan dalam situasi apapun sebagaimana tercantum dalam *BOC Charter*. Dalam hal terjadi benturan kepentingan, anggota Dewan Komisaris dilarang mengambil tindakan yang dapat merugikan atau mengurangi keuntungan Bank dan wajib mengungkapkan potensi benturan kepentingan dimaksud dalam setiap keputusan.	**Complied** The Board of Commissioners has monitored and managed potential conflicts of interest within the Bank. In performing their duties and responsibilities, all members of the Board of Commissioners are committed to avoiding potential conflicts of interest or always position themselves not to be involved in any situation containing potential conflicts of interest as stated in the BOC Charter. In the event of a conflict of interest, members of the Board of Commissioners are prohibited from taking actions that may harm or reduce the Bank's profits and must disclose the potential conflict of interest referred to in every decision.

Rekomendasi 1.7: Peningkatan Kompetensi Anggota Direksi dan Dewan Komisaris. Recommendation 1.7: Competency Improvement of Members of the Board of Directors and Board of Commissioners.	
REKOMENDASI 1.7.1:	**RECOMMENDATION 1.7.1:**
Dewan Komisaris memastikan bahwa anggota Direksi dan Dewan Komisaris memahami peran dan tanggung jawab mereka, karakteristik dan operasi korporasi, peraturan perundang-undangan dan standar yang relevan serta kewajiban lain yang berlaku. Direksi melalui Sekretaris Korporasi mendukung semua anggota Direksi dan Dewan Komisaris dalam memperbarui dan menyegarkan keterampilan dan pengetahuan mereka yang diperlukan untuk menjalankan peran mereka di Dewan.	The Board of Commissioners ensures that members of the Board of Directors and Board of Commissioners understand their roles and responsibilities, characteristics and operations of the corporation, relevant laws and regulations, and other applicable standards and obligations. The Board of Directors, through the Corporate Secretary, supports all members of the Board of Directors and Board of Commissioners in updating and refreshing the required skills and knowledge to perform their roles on the Board.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Dewan Komisaris dan Direksi telah mengikuti pendidikan dan pelatihan dengan tujuan untuk meningkatkan kemampuan strategis, menambah pengetahuan bisnis, meningkatkan kepemimpinan, mengembangkan keterampilan baru, serta meningkatkan dan menjaga kualitas layanan perbankan yang dimiliki. Adapun rincian pendidikan dan pelatihan yang diikuti Dewan Komisaris dan Direksi telah tertuang dalam Laporan Tahunan ini.	**Complied** The Board of Commissioners and Board of Directors have attended education and training programs with the aim of enhancing strategic capabilities, adding business knowledge, enhancing leadership, developing new skills, and improving as well as maintaining the quality of banking services. Details of education and training programs attended by the Board of Commissioners and Board of Directors are presented in this Annual Report.

Prinsip 2: Komposisi dan Remunerasi Direksi dan Dewan Komisaris
Principle 2: Composition and Remuneration of the Board of Directors and Board of Commissioners

Rekomendasi 2.1: Komposisi Direksi dan Dewan Komisaris.
Recommendation 2.1: Composition of the Board of Directors and Board of Commissioners.

REKOMENDASI 2.1.1:	RECOMMENDATION 2.1.1:
Dalam menentukan kandidat calon Direktur, Dewan Komisaris melalui Komite Nominasi dan Remunerasi tidak hanya mengandalkan rekomendasi dari Dewan Komisaris, manajemen atau Pemegang Saham mayoritas. Dewan Komisaris melalui Komite Nominasi dan Remunerasi dapat menggunakan sumber independen untuk menentukan kandidat yang memenuhi syarat.	In determining Director candidates, the Board of Commissioners, through the Nomination and Remuneration Committee, does not rely solely on recommendations from the Board of Commissioners, management, or majority shareholders. The Board of Commissioners, through the Nomination and Remuneration Committee, may use independent sources to determine qualified candidates.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Penjelasan Saat ini, Bank belum menggunakan jasa pihak ketiga yang independen dalam proses seleksi kandidat Dewan Komisaris. Meskipun demikian, Bank senantiasa memastikan penentuan kandidat calon Dewan Komisaris dan Direksi sesuai dengan aturan yang berlaku dan kualifikasi yang dibutuhkan oleh Bank.	**Complied** Currently, the Bank has not used the services of an independent third party in the selection process of Board of Commissioners candidates. Nevertheless, the Bank always ensures that the selection of candidates for the Board of Commissioners and Board of Directors is in accordance with applicable regulations and the qualifications required by the Bank.
REKOMENDASI 2.1.2:	**RECOMMENDATION 2.1.2:**
Dewan Komisaris memastikan bahwa kriteria dalam menyeleksi anggota Direksi mencakup paling tidak pengetahuan, kemampuan, dan keahlian yang dibutuhkan untuk memenuhi secara tepat peran Direksi serta memperhatikan terpenuhinya keberagaman Direksi.	The Board of Commissioners ensures that the criteria for selecting members of the Board of Directors include at least the required knowledge, abilities, and expertise to properly meet the role of the Board of Directors and pay attention to the fulfillment of the Board of Directors' diversity.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Dewan Komisaris melalui Komite Nominasi dan Remunerasi memastikan minimum kriteria yang harus dimiliki oleh calon anggota Dewan Komisaris dan Direksi Bank baik dari sisi integritas, kompetensi, reputasi, independensi, atau kriteria khusus lainnya sesuai bidang Direktur.	**Complied** The Board of Commissioners, through the Nomination and Remuneration Committee, ensures the minimum criteria that must be possessed by candidates of the Bank's Board of Commissioners and Board of Directors in terms of integrity, competence, reputation, independence, or other special criteria according to the respective field of each Director.
REKOMENDASI 2.1.3:	**RECOMMENDATION 2.1.3:**
Kebijakan korporasi tentang keberagaman pada, Direksi dan Dewan Komisaris diungkapkan dalam Laporan Tahunan.	The corporate policy on diversity in the Board of Directors and Board of Commissioners is disclosed in the Annual Report.
STATUS DAN PENERAPAN:	**STATUS AND IMPLEMENTATION:**
Terpenuhi Kebijakan keberagaman komposisi Dewan Komisaris dan Direksi telah diungkapkan pada Laporan Tahunan ini.	**Complied** The diversity policy of the composition of the Board of Commissioners and Board of Directors has been disclosed in this Annual Report.
REKOMENDASI 2.1.4:	**RECOMMENDATION 2.1.4:**
Dewan Komisaris memastikan bahwa kebijakan dan prosedur untuk seleksi dan nominasi Komisaris adalah jelas dan transparan sehingga dapat menghasilkan komposisi Dewan yang diinginkan. Dewan Komisaris menggunakan sumber independen untuk menentukan kandidat yang memenuhi syarat.	The Board of Commissioners ensures that the policies and procedures for the selection and nomination of Commissioners are clear and transparent so as to produce the desired Board composition. The Board of Commissioners uses independent sources to determine qualified candidates.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Dewan Komisaris dan Komite Nominasi dan Remunerasi telah melakukan fungsi dan tanggung jawabnya dalam memastikan proses nominasi dan remunerasi di Bank berjalan dengan benar dan transparan demi kepentingan Bank.	**Complied** The Board of Commissioners and the Nomination and Remuneration Committee have performed their functions and responsibilities in ensuring that the nomination and remuneration process at the Bank runs properly and transparently in the interests of the Bank.

REKOMENDASI 2.1.5:	RECOMMENDATION 2.1.5:
Dewan Komisaris/Komite yang menjalankan fungsi nominasi menetapkan prosedur dan kriteria nominasi yang konsisten dengan matriks keahlian Dewan Komisaris yang telah disetujui Dewan Komisaris dan memastikan bahwa profil kandidat memenuhi persyaratan yang ditetapkan dalam matriks keahlian dan kriteria nominasi.	The Board of Commissioners/Committee that performs the nomination function establishes nomination procedures and criteria, which are consistent with the Board of Commissioners' expertise matrix, which has been approved by the Board of Commissioners, and ensures that the candidate profile meets the established requirements in the expertise matrix and nomination criteria.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Komite Nominasi dan Remunerasi menjalankan fungsi nominasi berdasarkan prosedur dan kriteria nominasi yang tertuang dalam Kebijakan Nominasi No. 003/SK-KOM/09/18 tanggal 20 September 2018 dan disetujui oleh Dewan Komisaris.	**Complied** The Nomination and Remuneration Committee carries out the nomination function based on the nomination procedures and criteria set out in the Nomination Policy No. 003/SK-KOM/09/18 dated 20 September 2018 and approved by the Board of Commissioners.
REKOMENDASI 2.1.6:	**RECOMMENDATION 2.1.6:**
Komposisi Dewan Komisaris harus dibentuk sedemikian rupa sehingga anggota-anggotanya secara kelompok mencerminkan keberagaman dalam hal kemampuan, keahlian, pengetahuan, pengalaman, usia, latar belakang budaya, dan gender yang dibutuhkan untuk memenuhi secara tepat peran Dewan Komisaris.	The Board of Commissioners' composition must be formed in such a way that its members as a group reflect the diversity in terms of abilities, skills, knowledge, experience, age, cultural background, and gender required to properly fulfill the roles of the Board of Commissioners.
STATUS DAN PENERAPAN:	**STATUS AND IMPLEMENTATION:**
Terpenuhi Komposisi anggota Dewan Komisaris telah memperhatikan keberagaman keahlian, pengetahuan dan pengalaman yang dibutuhkan oleh Bank.	**Complied** The composition of the Board of Commissioners has taken into account the diversity of expertise, knowledge and experience required by the Bank.
REKOMENDASI 2.1.7:	**RECOMMENDATION 2.1.7:**
Untuk memampukan Dewan Komisaris dalam memberikan advis dan supervisi secara independen kepada Direksi dan untuk peran-peran yang terdapat potensi benturan kepentingan, Dewan Komisaris terdiri dari Komisaris Independen yang cukup jumlahnya, dengan masa jabatan yang dibatasi dan terdapat pengungkapan jangka waktu keanggotaan Dewan Komisaris serta independensi mereka dari sudut pandang korporasi.	To enable the Board of Commissioners to provide independent advice and supervision to the Board of Directors and for roles with potential conflicts of interest, the Board of Commissioners shall consist of a sufficient number of Independent Commissioners, with a limited term of office and disclosure of the term of office of the Board of Commissioners and their independence from a corporate perspective.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Pelaksanaan tugas Dewan Komisaris termasuk komposisi, masa jabatan, independensi, kehadiran rapat dan pelatihan di sepanjang tahun disampaikan secara detail pada Laporan Tahunan ini.	**Complied** The implementation of the Board of Commissioners' duties, including composition, term of office, independence, meeting attendance, and training throughout the year is presented in detail in this Annual Report.
REKOMENDASI 2.1.8:	**RECOMMENDATION 2.1.8:**
Untuk memfasilitasi fungsi Direksi dan Dewan Komisaris yang efektif dan guna meningkatkan kepercayaan investor dan pemangku kepentingan, Komite Nominasi dan Remunerasi memastikan bahwa terdapat proses yang formal, ketat, dan transparan untuk penunjukan dan pengangkatan anggota Direksi dan Dewan Komisaris.	To facilitate effective function of the Board of Directors and Board of Commissioners and to increase investors and stakeholders trust, the Nomination and Remuneration Committee ensures that there is a formal, rigorous, and transparent process for the selection and appointment of members of the Board of Directors and Board of Commissioners.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Komite Nominasi dan Remunerasi juga telah melakukan fungsi dan tanggung jawabnya dalam memastikan proses nominasi dan remunerasi di Bank berjalan dengan benar dan transparan demi kepentingan Bank. Hal ini bisa dilihat pada pembahasan di Laporan Tahunan ini.	**Complied** The Nomination and Remuneration Committee has also performed its functions and responsibilities in ensuring that the nomination and remuneration process at the Bank runs properly and transparently in the interests of the Bank. This matter can be seen in the discussion in this Annual Report.

Rekomendasi 2.2: Remunerasi Direksi dan Dewan Komisaris.
Recommendation 2.2: Remuneration of the Board of Directors and Board of Commissioners.

REKOMENDASI 2.2.1:	RECOMMENDATION 2.2.1:
Kebijakan remunerasi anggota Direksi terdiri atas struktur remunerasi yang berorientasi pada pengembangan korporasi yang berkelanjutan dan mendorong pencapaian tujuan jangka panjang. Remunerasi Direksi harus diusulkan, dapat dengan melalui Komite Nominasi dan Remunerasi, oleh Dewan Komisaris untuk diputuskan oleh RUPS. Jumlah remunerasi yang diusulkan kepada RUPS tersebut ditetapkan dengan mempertimbangkan peran setiap anggota Direksi dan situasi ekonomi serta kinerja korporasi.	The remuneration policy for the Board of Directors' members consists of a remuneration structure that is oriented towards sustainable corporate development and encourages the achievement of long-term goals. The Board of Directors' remuneration must be proposed, possibly through the Nomination and Remuneration Committee, by the Board of Commissioners to be resolved by the GMS. The remuneration amount proposed to the GMS is determined by considering the role of each member of the Board of Directors, the economic situation, and the corporate performance.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Bank memiliki dan menjalankan kebijakan remunerasi berbasiskan risiko sesuai Keputusan Dewan Komisaris No. 003/SK-KOM/09/18 tanggal 20 September 2018. Kebijakan remunerasi Bank disusun dengan mengedepankan sistem remunerasi yang kompetitif, adil dan seimbang, berdasarkan peraturan perundang-undangan yang berlaku dan dikaji ulang secara berkala.	**Complied** The Bank has and implements a risk-based remuneration policy in accordance with the Decision of the Board of Commissioners No. 003/SK-KOM/09/18 dated 20 September 2018. The Bank's remuneration policy is prepared by prioritizing a competitive, fair and balanced remuneration system, based on applicable laws and regulations and is reviewed periodically.
REKOMENDASI 2.2.2:	**RECOMMENDATION 2.2.2:**
Kebijakan remunerasi anggota Dewan Komisaris terdiri atas struktur remunerasi yang berorientasi pada pengembangan korporasi yang berkelanjutan dan mendorong pencapaian tujuan jangka panjang. Jumlah remunerasi yang diusulkan Dewan Komisaris kepada RUPS tersebut ditetapkan dengan mempertimbangkan peran setiap anggota Dewan Komisaris dan situasi ekonomi serta kinerja korporasi. Di samping itu juga harus dipertimbangkan posisinya sebagai Komisaris Utama dan ketua serta keanggotaannya dalam komite-komite.	The remuneration policy for the Board of Commissioners' members consists of a remuneration structure that is oriented towards sustainable corporate development and encourages the achievement of long-term goals. The remuneration amount proposed by the Board of Commissioners to the GMS is determined by considering the role of each member of the Board of Commissioners, the economic situation, and the corporate performance. In addition, it must also consider his/her position as President Commissioner and chairman as well as membership in committees.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank menyusun struktur, kebijakan, dan besaran remunerasi masing-masing anggota Dewan Komisaris dengan memperhatikan tugas, wewenang, kinerja, dan tanggung jawab Dewan Komisaris. Bank juga memperhatikan remunerasi yang berlaku di industri sejenis (*peers group*) dan kemampuan Bank.	**Complied** The Bank prepares the structure, policies, and remuneration amount for each member of the Board of Commissioners by considering duties, authorities, performance, and responsibilities of the Board of Commissioners. The Bank also pays attention to the remuneration that applies in similar industries (peer groups) as well as the Bank's capabilities.
REKOMENDASI 2.2.3:	**RECOMMENDATION 2.2.3:**
Untuk memastikan bahwa paket remunerasi ditentukan berdasarkan prestasi, kualifikasi, dan kompetensi Direktur dan Komisaris dengan memperhatikan kinerja operasi korporasi, kinerja individu dan kondisi pasar, Komite Nominasi dan Remunerasi memastikan bahwa terdapat prosedur yang adil dan transparan untuk menetapkan kebijakan remunerasi anggota Direksi dan Dewan Komisaris.	To ensure that the remuneration package is determined based on the achievements, qualifications, and competencies of the Directors and Commissioners by considering the corporate operational performance, individual performance, and market conditions, the Nomination and Remuneration Committee ensures that there are fair and transparent procedures for establishing remuneration policies for members of the Board of Directors and Board of Commissioners.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Komite Nominasi dan Remunerasi melakukan pembahasan atas remunerasi Dewan Komisaris dengan mempertimbangkan skala usaha, kompleksitas usaha, *peer group,* tingkat inflasi, kondisi dan kemampuan keuangan Bank, dan sesuai dengan peraturan yang berlaku. Selanjutnya, remunerasi Dewan Komisaris dan Direksi ditetapkan oleh RUPS.	**Complied** The Nomination and Remuneration Committee discusses the remuneration for the Board of Commissioners by considering the business scale, business complexity, peer group, inflation rate, financial condition and capability of the Bank, and in accordance with applicable regulations. Furthermore, the remuneration for the Board of Commissioners and Board of Directors is determined by the GMS.

Prinsip 3: Hubungan Kerja antara Direksi dan Dewan Komisaris
Principle 3: Working Relationship between the Board of Directors and Board of Commissioners

Rekomendasi 3.1: Sifat Hubungan Kerja.
Recommendation 3.1: Nature of Working Relationship.

REKOMENDASI 3.1.1:	RECOMMENDATION 3.1.1:
Terdapat diskusi yang terbuka antara Direksi dengan Dewan Komisaris serta di antara para anggota Direksi dan para anggota Dewan Komisaris. Namun, tetap penting menjaga kerahasiaan informasi agar tidak terjadi kebocoran informasi rahasia.	There are open discussions between the Board of Directors and the Board of Commissioners as well as among members of the Board of Directors and members of the Board of Commissioners. However, it remains important to maintain the confidentiality of information to avoid leakage of confidential information.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Diskusi Dewan Komisaris dan Direksi dapat dilakukan melalui rapat Dewan Komisaris bersama dengan Direksi.	**Complied** Discussion between the Board of Commissioners and the Board of Directors can be conducted through a joint Board of Commissioners meeting with the Board of Directors.
REKOMENDASI 3.1.2:	**RECOMMENDATION 3.1.2:**
Sesuai dengan tugas dan perannya masing-masing, Direksi bekerja sama dengan Dewan Komisaris dalam merumuskan misi, visi dan strategi korporasi dan secara reguler membahas pengimplementasiannya.	In accordance with their respective duties and roles, members of the Board of Directors cooperate with those of the Board of Commissioners in formulating corporate missions, visions, and strategies, and regularly discuss their implementation.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Setiap tahun, strategi dan kebijakan Bank dalam jangka pendek dan menengah disusun dalam bentuk Rencana Bisnis Bank (RBB) sesuai dengan Visi dan Misi yang telah ditetapkan. Secara berkala, Direksi bersama Dewan Komisaris beserta jajaran manajemen senior Bank melakukan evaluasi berkala terhadap strategi dan kebijakan Bank serta implementasinya di seluruh level organisasi.	**Complied** Every year, the Bank's strategy and policies in the short and medium-term are prepared in the form of a Bank Business Plan (RBB) in accordance with the established Vision and Mission. Periodically, the Board of Directors, together with the Board of Commissioners along with the Bank's senior management, evaluates the Bank's strategy and policies and their implementation at all levels of the organization.
REKOMENDASI 3.1.3:	**RECOMMENDATION 3.1.3:**
Sekretaris Korporasi memiliki peran penting dalam mendukung efektivitas hubungan kerja antara Direksi dengan Dewan Komisaris, mendorong implementasi praktik governansi korporat yang baik, termasuk komunikasi yang efektif dengan Pemegang Saham dan pemangku kepentingan lainnya.	The Corporate Secretary has a crucial role in supporting the effectiveness of working relationship between the Board of Directors and the Board of Commissioners, encouraging the implementation of good corporate governance practices, including effective communication with Shareholders and other stakeholders.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank menunjuk Caprie Ardira Azhar sebagai Kepala Divisi *Corporate Secretary* berdasarkan Keputusan Direksi No. 012/SK-DIR/HCM/01/21 tanggal 11 Januari 2021. *Corporate Secretary* Bank bertanggung jawab untuk memelihara citra Bank dan melindungi kepentingan Bank dengan membangun komunikasi dan hubungan baik dengan semua pihak serta sebagai penghubung antara Bank dengan Pemegang Saham dan pemangku kepentingan lainnya.	**Complied** The Bank appointed Caprie Ardira Azhar as Head of Corporate Secretary Division based on Board of Directors' Decision Letter No. 012/SK-DIR/HCM/01/21 dated 11 January 2021. The Bank's Corporate Secretary is responsible for maintaining the Bank's image and protecting the Bank's interests by establishing good communication and relations with all parties and being a liaison between the Bank and Shareholders and other stakeholders.

Rekomendasi 3.2: Akses informasi Dewan Komisaris.
Recommendation 3.2: Access to Information for the Board of Commissioners.

REKOMENDASI 3.2.1:	RECOMMENDATION 3.2.1:
Direksi bertanggung jawab untuk memastikan Dewan Komisaris mendapatkan akses informasi yang akurat, relevan, dan tepat waktu. Dewan Komisaris sendiri memastikan bahwa ia memperoleh informasi yang memadai. Direksi menyediakan informasi kepada Dewan Komisaris secara teratur, tanpa penundaan, dan secara komprehensif tentang semua masalah yang relevan dengan korporasi. Dewan Komisaris sewaktu-waktu dapat meminta Direksi untuk memberikan informasi tambahan.	The Board of Directors is responsible for ensuring that the Board of Commissioners has access to accurate, relevant, and timely information. The Board of Commissioners itself ensures that it obtains adequate information. The Board of Directors provides information to the Board of Commissioners regularly, without delay, and comprehensively on all matters relevant to the corporation. The Board of Commissioners may at any time request additional information to the Board of Directors.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Dewan Komisaris dapat berinteraksi dengan Direksi baik secara langsung maupun melalui rapat Dewan Komisaris bersama Direksi. *Corporate Secretary* juga membantu Direksi menyediakan akses informasi yang akurat, relevan dan tepat waktu kepada Dewan Komisaris serta mengadministrasikan, mendistribusikan dan menindaklanjuti surat masuk yang diterima Bank yang ditujukan kepada Dewan Komisaris dan/atau Direksi.	**Complied** The Board of Commissioners can interact with the Board of Directors both directly and through the joint meeting of the Board of Commissioners and Board of Directors. The Corporate Secretary also assists the Board of Directors in providing access to accurate, relevant, and timely information to the Board of Commissioners as well as administers, distributes, and follows up incoming letters received by the Bank and addressed to the Board of Commissioners and/or Board of Directors.

Rekomendasi 3.3: Tanggung jawab Direksi dan Dewan Komisaris atas Dampak Struktur.
Recommendation 3.3: Responsibilities of the Board of Directors and Board of Commissioners on Impacts of the Structure.

REKOMENDASI 3.3.1:	RECOMMENDATION 3.3.1:
Dampak struktur kepemilikan terhadap korporasi. Direksi dan Dewan Komisaris mempertimbangkan tanggung jawabnya dalam konteks struktur kepemilikan saham dan hubungan antar-Pemegang Saham korporasi yang mungkin berdampak terhadap pengelolaan dan operasi korporasi.	The impact of ownership structure on the corporation. The Board of Directors and Board of Commissioners consider their responsibilities in the context of shareholding structure and relationships between corporate Shareholders, which may have an impact on corporate management and operations.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Dewan Komisaris dan Direksi Bank memastikan bahwa struktur Pemegang Saham dan hubungan antar Pemegang Saham tidak memengaruhi pelaksanaan peran dan tanggung jawab Dewan Komisaris dan Direksi Bank. Seluruh keputusan dan kebijakan yang diambil Dewan Komisaris dan Direksi Bank diambil secara independen dan transparan demi kepentingan Bank.	**Complied** The Bank's Board of Commissioners and Board of Directors ensure that the Shareholder structure and relations between Shareholders do not affect the implementation of roles and responsibilities of the Bank's Board of Commissioners and Board of Directors. All decisions and policies made by the Bank's Board of Commissioners and Board of Directors are taken independently and transparently for the benefit of the Bank.

Prinsip 4: Perilaku Etis dan Bertanggung Jawab
Principle 4: Ethical and Responsible Conduct

Rekomendasi 4.1: Pedoman Etika dan Perilaku.
Recommendation 4.1: Code of Conduct.

REKOMENDASI 4.1.1:	RECOMMENDATION 4.1.1:
Pernyataan ini dituangkan dalam Pedoman Perilaku dan Etika Usaha yang harus secara jelas mengungkapkan harapan korporasi bahwa setiap anggota Direksi dan Dewan Komisaris serta karyawan akan: 1. Bertindak untuk kepentingan terbaik korporasi; 2. Bertindak dengan jujur dan dengan integritas berstandar tinggi; 3. Bersikap independen dan bertindak berdasarkan informasi yang lengkap, dengan iktikad baik, dengan uji tuntas dan kehati-hatian; 4. Mematuhi peraturan perundang-undangan yang berlaku bagi korporasi dan operasinya; 5. Menghindari tindakan yang melanggar peraturan perundang-undangan atau tindakan yang tidak etis berdasarkan pedoman etika korporasi; 6. Tidak terlibat atau berpartisipasi dalam kegiatan apa pun yang akan menimbulkan benturan kepentingan dengan kepentingan terbaik korporasi atau yang akan berdampak negatif terhadap reputasi korporasi; 7. Tidak mengambil manfaat atas properti atau informasi yang dimiliki korporasi, kepemilikan aset lainnya atau pelanggannya untuk kepentingan pribadi atau yang menyebabkan kerugian bagi korporasi dan pelanggannya; 8. Tidak memanfaatkan jabatannya atau peluang yang dihasilkan oleh jabatannya untuk kepentingan pribadi; 9. Menghindari perbuatan meminta atau menerima dari pihak ketiga pembayaran, gratifikasi atau keuntungan lain untuk dirinya sendiri atau untuk orang lain yang menimbulkan benturan kepentingan/ memberikan keuntungan kepada pihak ketiga secara melanggar peraturan perundang-undangan; 10. Menghormati perbedaan pendapat dan hak-hak setiap anggota Direksi, Dewan Komisaris, dan karyawan; serta 11. Memastikan pengungkapan yang lengkap, adil, akurat, tepat waktu, dan dapat dipahami dalam laporan dan dokumen yang disampaikan korporasi kepada regulator dan dalam komunikasi publik lainnya.	This statement is set out in the Code of Conduct and Business Ethics, which must clearly state the corporate expectation that each member of the Board of Directors and Board of Commissioners and employees will: 1. Act in the best interests of the corporation; 2. Act honestly and with a high standard of integrity; 3. Be independent and act based on complete information, in good faith, with due diligence and prudence; 4. Comply with laws and regulations that apply to the corporation and its operations; 5. Avoid actions that violate laws and regulations or unethical actions based on corporate ethics guidelines; 6. Not be involved or participate in any activity that will create a conflict of interest with the corporation's best interests or have a negative impact on the corporation's reputation; 7. Not take advantage of property or information owned by the corporation, ownership of other assets or its customers, for personal gain or which causes harm to the corporation and its customers; 8. Not take advantage of the position or opportunities generated by the position for personal gain; 9. Avoid the act of requesting or receiving from third parties payments, gratuities, or other benefits for oneself or for other people that will lead to conflicts of interest / provide benefits to third parties by violating the laws and regulations; 10. Respect differences of opinion and the rights of each member of the Board of Directors, Board of Commissioners, and employees; and 11. Ensure complete, fair, accurate, timely, and understandable disclosure in reports and documents submitted by the corporation to regulators and in other public communications.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank memiliki Kode Etik dan kebijakan pencegahan korupsi yang tertuang dalam Keputusan Direksi No. 002/SK-DIR/08/20 tanggal 7 Agustus 2020 tentang Kebijakan dan Standar Operasional Prosedur Penerapan Strategi *Anti Fraud*, yang wajib ditaati oleh seluruh insan Bank. Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.	**Complied** The Bank has a Code of Conduct and anti-corruption policy as stated in Board of Directors' Decision Letter No. 002/SK-DIR/08/20 dated 7 August 2020 on Policy and Standard Operating Procedure for Implementing Anti Fraud Strategy, which must be adhered to by all Bank personnel. More detailed information is presented in this Annual Report.
REKOMENDASI 4.1.2:	**RECOMMENDATION 4.1.2:**
Direksi menetapkan kebijakan dan praktik anti pencucian uang dan pendanaan terorisme, anti suap, antikorupsi, anti kecurangan (*anti fraud*), keterlibatan dalam politik dengan mengacu pada standar nasional atau internasional mengenai anti pencucian uang, anti suap, antikorupsi, anti kecurangan, atau standar terkait lainnya.	The Board of Directors establishes policies and practices for anti-money laundering and terrorism financing, anti-bribery, anti-corruption, anti fraud, political involvement with reference to the national or international standards regarding anti-money laundering, anti-bribery, anti-corruption, anti-fraud, or other related standards.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank memiliki Kode Etik dan kebijakan pencegahan korupsi yang tertuang dalam Keputusan Direksi No. 002/SK-DIR/08/20 tanggal 7 Agustus 2020 tentang Kebijakan dan Standar Operasional Prosedur Penerapan Strategi *Anti Fraud*, yang wajib ditaati oleh seluruh insan Bank. Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.	**Complied** The Bank has a Code of Conduct and anti-corruption policy as stated in Board of Directors' Decision Letter No. 002/SK-DIR/08/20 dated 7 August 2020 on Policy and Standard Operating Procedure for Implementing Anti Fraud Strategy, which must be adhered to by all Bank personnel. More detailed information is presented in this Annual Report.

Rekomendasi 4.2: Nilai–Nilai dan Budaya Organisasi. Recommendation 4.2: Corporate Values and Culture.	
REKOMENDASI 4.2.1:	**RECOMMENDATION 4.2.1:**
Korporasi mengartikulasikan, menumbuhkan, dan mengungkapkan budaya serta nilai-nilai korporasi.	The corporation articulates, fosters, and discloses corporate culture and values.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank menerapkan Nilai Budaya Perusahaan yakni SQEW agar setiap insan Bank dapat menjalankan operasional Bank dengan baik dan mencegah terjadinya berbagai tindakan *fraud,* pelanggaran peraturan perundang-undangan atau tidak etis. Nilai Budaya Perusahaan telah diungkapkan dalam Laporan Tahunan ini.	**Complied** The Bank implements the Corporate Culture Values, namely SQEW, so that every Bank personnel can carry out the Bank's operations properly and prevent various acts of fraud, acts that violates laws and regulations, or unethical actions. The Corporate Culture Values have been disclosed in this Annual Report.

Rekomendasi 4.3: Penegakan dan Komunikasi Pedoman Etika, Nilai-Nilai, dan Budaya. Recommendation 4.3: Enforcement and Communication of the Code of Conduct, Values, and Culture.	
REKOMENDASI 4.3.1:	**RECOMMENDATION 4.3.1:**
Pedoman perilaku dan kode etik korporasi dikomunikasikan secara efektif kepada Direksi, Dewan Komisaris, serta seluruh karyawan, diintegrasikan ke dalam strategi dan operasi korporasi termasuk sistem manajemen risiko dan struktur remunerasi, serta ditegakkan.	The corporate code of conduct and code of ethics are communicated effectively to the Board of Directors, Board of Commissioners, and all employees, integrated into corporate strategy and operations, including risk management system and remuneration structure, and being enforced.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Internalisasi Kode Etik dilakukan secara berkala melalui berbagai media yang tersedia guna menumbuhkan kesadaran dan pemahaman untuk menerapkan perilaku yang sesuai dengan nilai utama Bank. Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.	**Complied** Internalization of the Code of Conduct is regularly carried out through various available media to raise awareness and understanding to implement behavior that is in line with the Bank's core values. More detailed information is presented in this Annual Report.

Prinsip 5: Manajemen Risiko, Pengendalian Internal, dan Kepatuhan
Principle 5: Risk Management, Internal Control, and Compliance

Rekomendasi 5.1: Pengendalian Internal dan Kepatuhan. Recommendation 5.1: Internal Control and Compliance.	
REKOMENDASI 5.1.1:	**RECOMMENDATION 5.1.1:**
Direksi melakukan reviu secara berkala atas ketepatan desain dan efektivitas operasional sistem governansi, pengelolaan risiko, pengendalian internal dan kepatuhan korporasi dan melaporkan pelaksanaan dan hasil reviu kepada para Pemegang Saham melalui Laporan Tahunan Korporasi.	The Board of Directors periodically reviews the accuracy of designs and operational effectiveness of the governance system, risk management, internal control, and corporate compliance and reports the implementation and review results to Shareholders through the Corporate Annual Report.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Direksi telah melaksanakan SPI sesuai dengan prinsip-prinsip pengendalian dan evaluasi yang dilakukan Bank secara keseluruhan memperlihatkan kualitas SPI Bank berjalan dengan baik. Dewan Komisaris dan Direksi menyatakan bahwa Bank telah memiliki SPI yang efektif dan memadai dalam mengelola risiko-risiko yang dihadapi Bank tetap berada dalam batas toleransi dalam mendukung pencapaian tujuan Bank yang mana telah disampaikan pada Sistem Pengendalian Internal pada Laporan Tahunan ini.	**Complied** The Board of Directors has implemented internal control system in accordance with the overall principles of control and evaluation performed by the Bank, which indicates that the quality of the Bank's internal control system is running properly. The Board of Commissioners and Board of Directors state that the Bank has an effective and adequate internal control system in managing the risks faced by the Bank while remaining within the tolerance limit in supporting the achievement of the Bank's objectives, which has been conveyed in the Internal Control System in this Annual Report.

Rekomendasi 5.2: Manajemen Risiko. Recommendation 5.2: Risk Management.	
REKOMENDASI 5.2.1:	**RECOMMENDATION 5.2.1:**
Strategi dan risiko merupakan satu kesatuan, diungkapkan secara transparan, masuk ke dalam pelaksanaan tugas dan tanggung jawab Direksi dan Dewan Komisaris, serta dalam diskusi di rapat Dewan Komisaris dan Direksi.	Strategy and risk is a unity, disclosed transparently, included in the implementation of duties and responsibilities of the Board of Directors and Board of Commissioners, as well as in discussions at meetings of the Board of Commissioners and Board of Directors.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Dewan Komisaris dan Direksi senantiasa melakukan pengelolaan dan pemantauan risiko-risiko utama Bank dengan baik. Menyeimbangkan antara risiko, budaya kepatuhan dan kecukupan modal juga menjadi kebijakan pilar strategis Bank. Dewan Komisaris dan Direksi dibantu oleh Komite Pemantau Risiko dan Komite Manajemen Risiko secara berkala memantau dan mengkaji efektivitas pengendalian dan pengelolaan risiko di setiap rapat dibantu juga oleh SKAI & *Anti Fraud*.	**Complied** The Board of Commissioners and Board of Directors always manage and monitor the Bank's main risks properly. Balancing risk, compliance culture, and capital adequacy is also the Bank's strategic pillar policy. The Board of Commissioners and Board of Directors are assisted by the Risk Monitoring Committee and Risk Management Committee, which regularly monitor and review the effectiveness of risk control and management at each meeting, and are also assisted by the SKAI & Anti Fraud.
REKOMENDASI 5.2.2:	**RECOMMENDATION 5.2.2:**
Komite Pemantau Manajemen Risiko membantu pelaksanaan tugas Dewan Komisaris dengan menciptakan mekanisme yang transparan, fokus, dan independen dalam pengawasan manajemen risiko korporasi.	The Risk Management Monitoring Committee assists the implementation of the Board of Commissioners' duties by creating a transparent, focused, and independent mechanism for overseeing corporate risk management.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Dewan Komisaris memiliki Komite Pemantau Risiko yang beranggotakan Komisaris Independen dan pihak independen yang kompeten dan memiliki latar belakang sesuai dengan peraturan dan kebutuhan Bank. Komite Pemantau Risiko membantu memastikan bahwa penerapan manajemen risiko Bank tetap memenuhi unsur-unsur kecukupan prosedur dan metodologi pengelolaan risiko, sehingga kegiatan usaha Bank tetap dapat terkendali pada batas/limit yang dapat diterima dan menguntungkan Bank. Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.	**Complied** The Board of Commissioners has established the Risk Monitoring Committee consisting of Independent Commissioners and independent parties who are competent and have backgrounds in accordance with the Bank's regulations and needs. The Risk Monitoring Committee helps ensure that the Bank's risk management implementation still meets the elements of adequacy of risk management procedures and methodologies, enabling the Bank's business activities to remain under control at acceptable limits while still profitable for the Bank. More detailed information is presented in this Annual Report.

Rekomendasi 5.3: Integrasi Governansi, Manajemen Risiko, dan Kepatuhan.
Recommendation 5.3: Integration of Governance, Risk Management, and Compliance.

REKOMENDASI 5.3.1:	RECOMMENDATION 5.3.1:
Direksi membangun sistem governansi, manajemen risiko, dan kepatuhan (GRC) yang terintegrasi, dengan menangani berbagai ketidakpastian secara terpadu dan dengan integritas yang tinggi, untuk meyakinkan bahwa korporasi dapat mencapai tujuannya.	The Board of Directors establishes an integrated governance, risk management, and compliance (GRC) system, by handling various uncertainties in an integrated manner and with high integrity, to ensure that the corporation can achieve its objectives.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Direksi memastikan adanya koordinasi dan peningkatan kapabilitas di antara sistem utama GRC yang meliputi sistem governansi, manajemen strategi, manajemen kinerja, manajemen risiko, manajemen kepatuhan, dan sistem audit internal agar Bank tetap berada pada jalur yang benar dalam mencapai tujuan.	**Complied** The Board of Directors ensures coordination and capability building among the main GRC systems, which include governance system, strategic management, performance management, risk management, compliance management, and internal audit system to ensure that the Bank stays on the right track in achieving its objectives.
REKOMENDASI 5.3.2:	**RECOMMENDATION 5.3.2:**
Direksi memastikan bahwa bagian yang membawahi fungsi kepatuhan tidak merangkap melaksanakan fungsi yang berpotensi menimbulkan benturan kepentingan.	The Board of Directors ensures that the division in charge of the compliance function does not concurrently perform functions that have the potential to cause a conflict of interest.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Direktur Kepatuhan dan Manajemen Risko serta organ di bawahnya yang membawahi fungsi kepatuhan tidak merangkap melaksanakan fungsi yang berpotensi menimbulkan benturan kepentingan sebagaimana digambarkan dalam Struktur Organisasi Bank dalam Laporan Tahunan ini.	**Complied** The Director of Compliance and Risk Management and all its sub-organs who oversee the compliance function do not concurrently perform functions that have the potential to cause a conflict of interest as described in the Bank's Organizational Structure in this Annual Report.

Rekomendasi 5.4: Audit Internal.
Recommendation 5.4: Internal Audit.

REKOMENDASI 5.4.1:	RECOMMENDATION 5.4.1:
Dewan Komisaris melalui Komite Audit memantau dan memastikan bahwa fungsi audit internal membantu korporasi untuk mencapai tujuannya dengan membawa pendekatan yang objektif dan disiplin untuk mengevaluasi dan meningkatkan efektivitas manajemen risiko, pengendalian internal, dan governansi korporat.	The Board of Commissioners, through the Audit Committee, oversees and ensures that the internal audit function assists the corporation to achieve its objectives through an objective and disciplined approach to evaluate and improve the effectiveness of risk management, internal control, and corporate governance.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Dewan Komisaris memiliki Komite Audit yang memastikan pelaksanaan tugas audit internal telah dilakukan secara objektif dan independen. Pengangkatan dan pemberhentian Kepala SKAI & *Anti Fraud* juga memperhatikan rekomendasi dari Komite Audit. Auditor internal juga memiliki akses langsung kepada Komite Audit. Informasi lebih lengkap disampaikan dalam Laporan Tahunan ini.	**Complied** The Board of Commissioners has established the Audit Committee, which ensures that the internal audit duties are performed objectively and independently. The appointment and dismissal of the Head of SKAI & Anti Fraud also considers recommendations from the Audit Committee. The internal audit also has direct access to the Audit Committee. More detailed information is presented in this Annual Report.

Prinsip 6: Pengungkapan dan Transparansi
Principle 6: Disclosure and Transparency

Rekomendasi 6.1: Kebijakan Pengungkapan.
Recommendation 6.1: Disclosure Policy.

REKOMENDASI 6.1.1:	RECOMMENDATION 6.1.1:
Korporasi memiliki kebijakan dan prosedur pengungkapan dan transparansi yang memastikan pengungkapan informasi material dan menjaga informasi sensitif serta rahasia korporasi.	The corporation has disclosure and transparency policies and procedures that ensure disclosure of material information and safeguard sensitive information as well as corporate secrets.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank memiliki Kebijakan Komunikasi dengan Pemegang Saham dan Investor yang diatur dalam Anggaran Dasar Bank, yang mengatur pengungkapan informasi material dan menjaga informasi sensitif serta rahasia, serta kewajiban pengungkapan/keterbukaan informasi berdasarkan peraturan berlaku.	**Complied** The Bank has a communication policy with Shareholders and investors as set out in the Bank's Articles of Association, which governs the disclosure of material information and safeguarding of sensitive and confidential information, as well as disclosure obligations under applicable regulations.
REKOMENDASI 6.1.2:	**RECOMMENDATION 6.1.2:**
Hak Pemegang Saham untuk memperoleh secara teratur dan tepat waktu informasi material yang relevan tentang korporasi harus dipenuhi.	Shareholders' rights to obtain regularly and timely relevant material information regarding the corporation must be fulfilled.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank memastikan seluruh Pemegang Saham memiliki hak yang sama dalam menerima informasi material secara benar, tepat waktu, berkala, dan sesuai peraturan yang berlaku.	**Complied** The Bank ensures that all Shareholders have the same rights in receiving material information correctly, timely, periodically, and in accordance with the applicable regulations.

Rekomendasi 6.2: Laporan Keuangan dan Keberlanjutan.
Recommendation 6.2: Financial Statements and Sustainability Report.

REKOMENDASI 6.2.1:	RECOMMENDATION 6.2.1:
Korporasi mengungkapkan sistem dan prosedur untuk memastikan bahwa Laporan Keuangan Interim yang tidak diaudit atau direviu oleh auditor eksternal secara material adalah akurat, lengkap, dan memberikan investor informasi yang tepat untuk membuat keputusan investasi yang tepat.	The Corporation discloses systems and procedures to ensure that Interim Financial Statements that are not materially audited or reviewed by external auditors are accurate, complete, and provide investors with the appropriate information to make the right investment decisions.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank memiliki sistem dan prosedur yang mengatur pengendalian internal atas pelaporan keuangan, termasuk Laporan Keuangan Interim, peran fungsi manajemen risiko/kepatuhan/pengawasan manajemen dan fungsi audit internal dalam memastikan integritas Laporan Keuangan Interim, dan peran Komite Audit dalam menelaah Laporan Keuangan yang akan dipublikasikan oleh Bank.	**Complied** The Bank has systems and procedures to regulate internal control over financial reporting, including Interim Financial Statements, the role of risk management/compliance/supervision management function, and internal audit functions to ensure the integrity of Interim Financial Statements, and the role of the Audit Committee in reviewing Financial Statements to be published by Bank.
REKOMENDASI 6.2.2:	**RECOMMENDATION 6.2.2:**
Komite Audit memastikan kualitas audit Laporan Keuangan yang dilaksanakan oleh auditor eksternal. Kegiatan ini termasuk merekomendasikan penunjukan, penunjukan kembali dan, jika perlu, pemberhentian, serta remunerasi auditor eksternal.	The Audit Committee ensures the quality of audit on Financial Statements conducted by the external auditors. This activity includes recommending the appointment, reappointment, and, if necessary, dismissal and remuneration of the external auditors.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Komite Audit Bank memastikan kualitas audit Laporan Keuangan yang dilaksanakan oleh auditor eksternal. Kegiatan ini termasuk merekomendasikan penunjukan, penunjukan kembali dan, jika perlu, pemberhentian dan remunerasi auditor eksternal.	**Complied** The Audit Committee of the Bank ensures the quality of audit on Financial Statements conducted by external auditors. This activity includes recommending the appointment, reappointment, and, if necessary, dismissal and remuneration of the external auditors.

REKOMENDASI 6.2.3:	RECOMMENDATION 6.2.3:
Laporan Keberlanjutan harus disiapkan dan diungkapkan dengan akurat dan disusun sesuai kerangka pelaporan keberlanjutan nasional atau internasional.	The Sustainability Report shall be accurately prepared and disclosed and compiled in accordance with national or international sustainability reporting frameworks.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Penjelasan Laporan Keberlanjutan Bank disusun sesuai kerangka pelaporan keberlanjutan dari Peraturan Otoritas Jasa Keuangan. Meski demikian, pelaporan keberlanjutan Bank telah memuat beberapa kriteria GRI meskipun belum sepenuhnya.	**Explanation** The Sustainability Report of the Bank is prepared in accordance with the sustainability reporting framework of the Financial Services Authority Regulations. Nevertheless, the Bank's sustainability reporting consists of several GRI criteria, although not fully covered.
REKOMENDASI 6.2.4:	**RECOMMENDATION 6.2.4:**
Korporasi menerbitkan Laporan Tahunan secara terintegrasi yang menempatkan kinerja historis ke dalam konteks dan menggambarkan risiko, peluang, dan prospek korporasi di masa depan, sehingga membantu Pemegang Saham dan pemangku kepentingan memahami tujuan strategis korporasi dan kemajuannya dalam menciptakan nilai yang berkelanjutan.	The corporation issues an integrated Annual Report that puts historical performance into context and describes the corporation's risks, opportunities, and future prospects, thereby helping Shareholders and stakeholders understand the corporation's strategic objectives and its progress in creating sustainable value.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Laporan Tahunan Bank telah mencantumkan kinerja historis dalam konteks dan menggambarkan risiko, peluang, dan prospek korporasi di masa depan.	**Complied** The Bank's Annual Report has put historical performance in context and described the risks, opportunities, and future prospects of the corporation.

Rekomendasi 6.3: Diseminasi Informasi.
Recommendation 6.3: Dissemination of Information.

REKOMENDASI 6.3.1:	RECOMMENDATION 6.3.1:
Saluran penyebaran informasi harus menyediakan akses yang setara, tepat waktu, dan relatif murah untuk informasi yang relevan bagi pengguna.	Channels for disseminating Information should provide users with equal, timely, and relatively inexpensive access to relevant information.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank secara berkala memperbarui dan memberikan kemudahan akses informasi seputar aktivitas dan kinerja Bank kepada para pemangku kepentingan agar mengetahui kondisi Bank secara jelas dan terbuka. Berbagai kanal komunikasi yang tersedia termasuk media sosial, situs web, *e-mail blast* dan paparan publik bagi nasabah dan publik, siaran pers, serta kanal komunikasi khusus internal untuk karyawan Bank.	**Complied** The Bank regularly updates and provides easy access to information regarding the Bank's activities and performance to stakeholders, allowing them to be informed about the Bank's condition in a clear and transparent manner. Various available communication channels include social media, websites, e-mail blasts, and public expose for customers and the public, press releases, as well as a special internal communication channels for the Bank's employees.
REKOMENDASI 6.3.2:	**RECOMMENDATION 6.3.2:**
Korporasi memastikan bahwa pernyataan tahunan terhadap penerapan Pedoman Umum Governansi Korporat Indonesia, termasuk penjelasan atas penerapan atas masing-masing Rekomendasi dan Panduan tersedia di situs web selama jangka waktu minimal 5 (lima) tahun.	The corporation ensures that an annual statement regarding the implementation of General Guidelines for Indonesian Corporate Governance, including an explanation of the implementation of each Recommendation and Guideline is available on the website for a minimum period of 5 (five) years.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Penjelasan Saat ini, pernyataan terhadap penerapan PUGKI belum tersedia di situs web Bank.	**Explanation** Currently, a statement on the implementation of PUGKI is not available on the Bank's website.
REKOMENDASI 6.3.3:	**RECOMMENDATION 6.3.3:**
Untuk korporasi yang terdaftar di pasar modal di yurisdiksi selain yurisdiksi asal, peraturan perundang-undangan atas governansi korporat yang berlaku harus di diungkapkan dengan jelas. Dalam hal *cross listing*, kriteria dan prosedur *cross listing*, kriteria dan prosedur untuk mengakui persyaratan *listing* untuk *listing* utama harus transparan dan didokumentasikan.	For corporations listed on the capital market in jurisdictions other than the jurisdiction of origin, applicable laws and regulations on corporate governance must be clearly disclosed. In the case of cross listing, the criteria and procedures for cross listing, criteria and procedures for recognizing the listing requirements for the primary listing must be transparent and documented.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank merupakan entitas usaha yang didirikan di Indonesia dan tunduk terhadap peraturan yang berlaku di Indonesia.	**Complied** The Bank is a business entity incorporated in Indonesia and is subject to the applicable regulations in Indonesia.

Prinsip 7: Perlindungan terhadap Hak-Hak Pemegang Saham
Principle 7: Protection of Shareholders Rights

Rekomendasi 7.1: Hak Pemegang Saham. Recommendation 7.1: Shareholders Rights.	
REKOMENDASI 7.1.1:	**RECOMMENDATION 7.1.1:**
Korporasi memiliki suatu kebijakan komunikasi yang memfasilitasi dan mendorong partisipasi Pemegang Saham atau investor.	The corporation has a communication policy that facilitates and encourages shareholder or investor participation.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank memiliki kebijakan komunikasi dengan Pemegang Saham dan investor yang yang diatur dalam Anggaran Dasar Bank.	**Complied** The Bank has a communication policy with Shareholders and investors as set out in the Bank's Articles of Association.
REKOMENDASI 7.1.2:	**RECOMMENDATION 7.1.2:**
Korporasi yang merupakan Entitas Induk memastikan bahwa kebijakan governansi korporatnya berlaku bagi Entitas Anak dan Entitas Sepengendali yang di dalamnya investasi korporasi adalah signifikan.	Corporations that are Parent Entities ensure that their corporate governance policies apply to Subsidiaries and Entities under Common Control in which their investment is significant.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Penjelasan Bank memiliki kebijakan komunikasi dengan Pemegang Saham dan investor yang diatur dalam Anggaran Dasar Bank. Saat ini, Bank tidak memiliki Entitas Anak dan Entitas Sepengendali.	**Explanation** The Bank has a communication policy with Shareholders and investors as stipulated in the Bank's Articles of Association. Currently, the Bank does not have any Subsidiaries and entities under common control.
REKOMENDASI 7.1.3:	**RECOMMENDATION 7.1.3:**
Korporasi memiliki aturan dan prosedur yang mengatur akuisisi, pengambil alihan, dan transaksi luar biasa, seperti merger dan penjualan aset korporasi yang substansial untuk memastikan transaksi terjadi secara transparan dan dalam kondisi yang wajar dan melindungi hak-hak semua Pemegang Saham sesuai dengan kelasnya.	Corporations have rules and procedures that govern acquisitions, takeovers, and extraordinary transactions, such as mergers and sales of substantial corporate assets to ensure that the transactions occur in a transparent manner and under reasonable conditions as well as protecting the rights of all Shareholders according to class.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Anggaran Dasar Bank telah mengatur prosedur yang mengatur akuisisi, pengambil alihan, dan transaksi luar biasa. Selain itu, hak, wewenang, dan tanggung jawab Pemegang Saham juga diatur secara rinci dalam Anggaran Dasar yang dapat diakses juga di situs web Bank (www.victoriabank.co.id).	**Complied** The Bank's Articles of Association has set out procedures that govern acquisitions, takeovers, and extraordinary transactions. In addition, the rights, authorities, and responsibilities of Shareholders are also stipulated in detail in the Articles of Association, accessible on the Bank's website (www.victoriabank.co.id).
Rekomendasi 7.2: Perlakuan Adil Terhadap Pemegang Saham. **Recommendation 7.2: Fair Treatment to Shareholders.**	
REKOMENDASI 7.2.1:	**RECOMMENDATION 7.2.1:**
Korporasi memiliki aturan dan prosedur yang memastikan: 1. Semua Pemegang Saham dari seri yang sama dalam 1 (satu) kelas saham harus diperlakukan setara; serta 2. Pengungkapan aturan dan prosedur tersebut serta pengungkapan struktur modal dan pengaturan yang memungkinkan Pemegang Saham tertentu memeroleh pengaruh atau kendali yang tidak proporsional dengan kepemilikan sahamnya.	Corporations have rules and procedures ensuring that: 1. All Shareholders of the same series in 1 (one) class of shares shall be treated equally; and 2. There shall be disclosure of such rules and procedures, as well as disclosure of capital structure and arrangements that allow certain Shareholders to gain influence or control that is disproportionate to their share ownership.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Sesuai dengan Anggaran Dasar Bank, seluruh saham Bank adalah saham atas nama. Seluruh Pemegang Saham memiliki hak yang sama, yakni masing-masing saham memiliki hak atas 1 (satu) suara.	**Complied** Pursuant to the Bank's Articles of Association, all shares of the Bank are proprietary shares. All Shareholders have the same rights, in which each share has the right to cast 1 (one) vote.
REKOMENDASI 7.2.2:	**RECOMMENDATION 7.2.2:**
Korporasi memiliki aturan dan prosedur yang memastikan transaksi pihak berelasi disetujui dan dilaksanakan sedemikian rupa yang dapat meyakinkan bahwa benturan kepentingan telah dikelola dengan tepat, dan melindungi kepentingan korporasi dan Pemegang Saham.	The corporation has rules and procedures that ensure related party transactions are approved and implemented in such a way as to ensure that conflicts of interest are properly managed, and protect the interests of the corporation and Shareholders.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Bank senantiasa memastikan transaksi pihak berelasi yang dilaksanakan tidak memiliki benturan kepentingan serta kepentingan Bank dan Pemegang Saham telah terlindungi.	**Complied** The Bank always ensures that the related-party transactions made do not have conflicts of interest and that the interests of the Bank and Shareholders are protected.
REKOMENDASI 7.2.3:	**RECOMMENDATION 7.2.3:**
Korporasi memiliki dan mengungkapkan kebijakan untuk mencegah terjadinya *insider trading*. Korporasi memiliki aturan yang jelas mengenai perdagangan apa pun dalam saham korporasi yang dilakukan oleh Direktur, Komisaris dan orang dalam untuk memastikan bahwa siapa pun tidak boleh mendapatkan keuntungan secara langsung atau tidak langsung dari informasi yang tidak/belum tersedia di pasar.	The corporations has and discloses policies to prevent insider trading. The corporation has clear rules regarding any trading in corporate shares conducted by Directors, Commissioners, and insiders to ensure that no one may benefit directly or indirectly from information that is not/not yet available in the market.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Pengungkapan untuk mencegah terjadinya *insider trading* salah satunya tertuang dalam Kode Etik.	**Complied** Disclosure to prevent insider trading, one of which is set out in the Code of Conduct.

Rekomendasi 7.3: Rapat Umum Pemegang Saham.
Recommendation 7.3: General Meeting of Shareholders.

REKOMENDASI 7.3.1:	RECOMMENDATION 7.3.1:
Korporasi melakukan panggilan RUPS dengan agenda dan materi RUPS selengkap dan sedini mungkin (paling lambat 28 hari sebelum RUPS) untuk memberikan waktu dan materi yang cukup bagi Pemegang Saham untuk mempelajari dengan baik agenda rapat. Undangan rapat dan seluruh informasi RUPS diungkapkan melalui sarana elektronik seperti melalui situs web korporasi.	The corporation makes a notice for GMS with the agenda and materials for GMS as completely and as early as possible (no later than 28 days prior to the GMS) to provide sufficient time and materials for Shareholders to properly study the meeting agenda. Meeting invitations and all GMS information are disclosed through electronic means, such as through the corporate website.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank mengumumkan panggilan RUPS paling lambat 28 hari sebelum tanggal pelaksanaan RUPS, dengan tidak memperhitungkan tanggal pemanggilan. Informasi lengkap mengenai agenda dan materi RUPS juga tersedia di situs web Bank.	**Complied** The Bank announces the notice for GMS no later than 28 days prior to the date of the GMS, regardless the date of the notice. Complete information regarding the GMS agenda and materials is also available on the Bank's website.
REKOMENDASI 7.3.2:	**RECOMMENDATION 7.3.2:**
Korporasi memiliki dan mengungkapkan aturan dan prosedur yang memfasilitasi Pemegang Saham dalam berpartisipasi dan memberikan suara secara efektif di RUPS.	The Corporation has and discloses rules and procedures that facilitate Shareholders to participate and vote effectively at the GMS.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Mekanisme pengambilan keputusan/pemungutan suara RUPS disampaikan dalam Tata Tertib RUPS yang disampaikan di situs web Bank dan dibacakan kembali oleh *Corporate Secretary* pada saat dimulainya RUPS. Pemungutan suara dilakukan untuk masing-masing agenda RUPS Tahunan dan menunjuk pihak independen, Biro Administrasi Efek dan Notaris untuk melakukan perhitungan suara.	**Complied** The GMS resolutions adoption/voting mechanism is presented in the GMS Conduct, which is posted on the Bank's website and read back by the Corporate Secretary at the commencement of the GMS. Voting is carried out for each Annual GMS agenda item and independent parties, such as the Share Registrar Bureau and Notary, are appointed to count the votes.
REKOMENDASI 7.3.3:	**RECOMMENDATION 7.3.3:**
Pemegang Saham berpartisipasi efektif dalam menetapkan penunjukan anggota Direksi dan Dewan Komisaris.	Shareholders participate effectively to determine the appointment of members of the Board of Directors and Board of Commissioners.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Riwayat hidup kandidat anggota Dewan Komisaris dan Direksi disampaikan bersamaan dengan panggilan RUPS Tahunan kepada publik melalui situs web Bank, dan pemungutan suara juga dilakukan secara terpisah untuk masing-masing kandidat.	**Complied** The curriculum vitae of candidates for members of the Board of Commissioners and Board of Directors are submitted together with the notice to the Annual GMS to the public through the Bank's website, and voting is also carried out separately for each candidate.
REKOMENDASI 7.3.4:	**RECOMMENDATION 7.3.4:**
Korporasi memastikan transparansi dan akuntabilitas auditor eksternal di RUPS.	The corporation ensures transparency and accountability of the external auditor at the GMS.

STATUS DAN KETERANGAN:	STATUS AND DESCRIPTION:
Terpenuhi Bank menjamin keterbukaan dan akuntabilitas auditor eksternal pada RUPS dan melaksanakan proses pemungutan suara untuk menentukan penunjukan auditor eksternal.	**Complied** The Bank guarantees transparency and accountability of the external auditors at the GMS and carries out voting to determine the appointment of external auditors.
REKOMENDASI 7.3.5:	**RECOMMENDATION 7.3.5:**
Penyampaian hasil pemungutan suara dan ringkasan risalah RUPS secara lengkap diumumkan ke publik pada hari kerja berikutnya.	Submission of voting results and a complete summary of the GMS minutes are announced to the public on the following working day.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Hasil pemungutan suara dan ringkasan risalah RUPS Bank secara lengkap diumumkan ke publik di hari yang sama setelah selesainya RUPS melalui situs web Bank.	**Complied** The voting results and complete summary of the minutes of the Bank's GMS are announced to the public on the same day after the completion of the GMS through the Bank's website.

Prinsip 8: Penghargaan terhadap Pemangku Kepentingan
Principle 8: Award for Stakeholders

Rekomendasi 8.1: Keterlibatan Pemangku Kepentingan Kunci (*Stakeholder Engagement*).
Recommendation 8.1: Key Stakeholder Engagement.

REKOMENDASI 8.1.1:	RECOMMENDATION 8.1.1:
Korporasi melalui Sekretaris Korporasi melaksanakan komunikasi yang reguler, transparan dan efektif dengan pemangku kepentingan kunci serta melibatkan mereka untuk memahami harapan dan keluhan mereka serta dampak korporasi terhadap mereka.	The corporation, through the Corporate Secretary, carries out regular, transparent, and effective communication with key stakeholders and engages them to understand their expectations, grievances, and the impact of the corporation on them.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank mengungkapkan proses dalam mengidentifikasi dan memilih pemangku kepentingan kunci yang akan dilibatkan telah diuangkapkan dalam Laporan Tahunan. Bank juga memiliki WBS sebagai sarana penyampaian saran, masukan dan keluhan/pengaduan yang aman dan independen.	**Complied** The Bank discloses the process of identifying and selecting key stakeholders to be involved, which has been disclosed in the Annual Report. The Bank also has established a WBS as a safe and independent means of conveying suggestions, input, and grievances/complaints.

Rekomendasi 8.2: Integrasi Keberlanjutan dalam Model Bisnis.
Recommendation 8.2: Integration of Sustainability in Business Models.

REKOMENDASI 8.2.1:	RECOMMENDATION 8.2.1:
Dewan Komisaris bersama-sama dengan Direksi bertanggung jawab, akuntabel, dan transparan atas governansi keberlanjutan, termasuk menetapkan strategi, prioritas, dan target keberlanjutan korporasi. Direksi dan Dewan Komisaris memasukkan pertimbangan keberlanjutan ketika menjalankan perannya, termasuk antara lain dalam pengembangan dan implementasi strategi korporasi, rencana bisnis, rencana aksi utama dan manajemen risiko.	The Board of Commissioners and the Board of Directors are responsible, accountable, and transparent for sustainability governance, including in establishing corporate sustainability strategies, priorities, and targets. The Board of Directors and Board of Board of Commissioners incorporate sustainability considerations when performing their roles, including by developing and implementing corporate strategies, business plans, main action plans, and risk management.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Direksi memastikan bahwa strategi, prioritas dan target keberlanjutan korporasi serta kinerja terhadap target ini dikomunikasikan kepada para pemangku kepentingan sebagaimana dilaporkan dalam Laporan Tahunan ini.	**Complied** The Board of Directors ensures that corporate sustainability strategies, priorities, and targets, as well as performance against such targets are communicated to stakeholders as reported in this Annual Report.

Rekomendasi 8.3: Perlindungan terhadap Pemangku Kepentingan.
Recommendation 8.3: Protection for Stakeholders.

REKOMENDASI 8.3.1:	RECOMMENDATION 8.3.1:
Direksi memastikan dan mengungkapkan bahwa operasi korporasi mencerminkan penerapan standar etika, tanggung jawab sosial dan lingkungan yang tinggi di seluruh korporasi dan memastikan bahwa kebijakan dan prosedur yang tepat diterapkan untuk menghormati serta mematuhi hak-hak pemangku kepentingan.	The Board of Directors ensures and discloses that corporate operations reflect the application of high standards of ethics, social and environmental responsibility throughout the corporation and ensures that appropriate policies and procedures are in place to respect and comply with stakeholders rights.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Bank memiliki berbagai kebijakan sebagai pedoman dalam menjalankan operasi bisnis yang sesuai etika, tanggung jawab sosial dan lingkungan, serta menghormati dan mematuhi hak-hak pemangku kepentingan. Hal ini disampaikan secara lengkap pada Laporan Tahunan Bank.	**Complied** The Bank has various policies as guidelines in carrying out business operations that are ethical, socially, and environmentally responsible, and respecting and complying with the stakeholders rights. This is presented completely in the Bank's Annual Report.

REKOMENDASI 8.3.2:	RECOMMENDATION 8.3.2:
Direksi mendorong karyawan bekerja untuk kepentingan jangka panjang korporasi dan mengedepankan keberlanjutan.	The Board of Directors encourages employees to work for the long-term interests of the corporation and prioritizes sustainability.
STATUS DAN KETERANGAN:	**STATUS AND DESCRIPTION:**
Terpenuhi Guna mendorong penciptaan nilai yang berkelanjutan, Bank memiliki kebijakan pemberian insentif jangka panjang kepada karyawan berdasarkan Keputusan Direksi No. 001A/SK-DIR/12/22 tanggal 1 Desember 2022 tentang Kebijakan dan Prosedur *Human Capital Management*.	**Complied** In order to encourage sustainable value creation, the Bank has a policy of providing long-term incentives to employees based on Board of Directors Decree No. 001A/SK-DIR/12/22 dated 1 December 2022 concerning Human Capital Management Policies and Procedures.

Rencana Strategis Bank
Bank's Strategic Plans

Bank selalu mengevaluasi strategi jangka pendek, menengah, dan panjang yang dituangkan dalam Rencana Bisnis Bank (RBB). RBB 2024-2026 disusun dengan merujuk pada Peraturan Otoritas Jasa Keuangan No. 5/POJK.03/2016. Penyusunan RBB juga memperhitungkan faktor eksternal dan internal, prinsip kehati-hatian, manajemen risiko, dan asas perbankan yang sehat.

Pada tahun 2023, Bank telah menetapkan rencana strategis untuk rencana jangka panjang (*corporate plan*) dan rencana jangka menengah dan pendek (*business plan*) yang tertuang dalam RBB 2024-2026 yang mengangkat tema tema *"Continuous Transformation With Strong Governance and Excellence Services for Sustainable Growth"* dengan penjelasan sebagai berikut:

Rencana Jangka Panjang

Bank Victoria telah merumuskan strategi-strategi untuk mencapai Visi dan Misi dalam kurun waktu 5 (lima) tahun mendatang, yaitu:
1. Menjaga dan memperkuat penerapan prinsip-prinsip GCG secara konsisten yang selaras dengan prinsip-prinsip manajemen risiko dan kepatuhan terhadap regulasi *(compliance)*;
2. Menjaga dan memelihara permodalan di level yang kuat dan memadai sebagai landasan pengembangan dan pertumbuhan skala bisnis Bank yang *prudent* dan berkelanjutan;
3. Melanjutkan dan meningkatkan inovasi produk dan layanan terbaik yang berfokus kepada nasabah *(customer-centric)*;
4. Melanjutkan pengembangan sistem teknologi informasi untuk mendukung efisiensi, inovasi, dan pengembangan produk serta peningkatan layanan;
5. Melanjutkan optimalisasi melalui evaluasi kinerja jaringan kantor cabang guna meningkatkan efisiensi dan produktivitas dalam rangka mencapai pertumbuhan bisnis yang berkelanjutan;
6. Mengembangkan kualitas dan meningkatkan produktivitas sumber daya manusia dan pelayanan nasabah untuk menghadapi tantangan bisnis; dan
7. Meningkatkan nilai perusahaan bagi Pemegang Saham dan pemangku kepentingan.

The Bank constantly evaluates the short-, medium-, and long-term strategies as outlined in the Bank's Business Plan (RBB). The 2024-2026 RBB is prepared by referring to the Financial Services Authority Regulation No. 5/POJK.03/2016. The preparation of RBB also considers external and internal factors, prudential principle, risk management, and sound banking principles.

In 2023, the Bank has set a strategic plan for the long-term plan (corporate plan) and the medium and short-term plan (business plan) contained in the RBB 2024-2026 with the theme "Continuous Transformation With Strong Governance and Excellence Services for Sustainable Growth" with the following explanation:

Long-Term Plan

Bank Victoria has formulated strategies to achieve the Vision and Mission within 5 (five) years, as follows:
1. Maintain and strengthen the consistent implementation of GCG principles that are aligned with the principles of risk management and regulatory compliance;
2. Maintain and preserve capital at a strong and adequate level as the foundation for prudent and sustainable development and growth of the Bank's business scale;
3. Continue and improve product innovation and best customer-centric services;
4. Continue the development of information technology systems to support efficiency, innovation, and product development as well as service improvement;
5. Continue optimization through performance evaluation of branch office network to improve efficiency and productivity in order to achieve sustainable business growth;
6. Develop the quality and improve the productivity of human resources and customer service to face business challenges; and
7. Increase corporate value for shareholders and stakeholders.

Rencana Jangka Menengah dan Pendek

Bank menetapkan target jangka pendek untuk setahun ke depan dan target jangka menengah untuk 3 (tiga) tahun mendatang yang diuraikan sebagai berikut:

1. Penguatan GCG dan penerapan manajemen risiko, meliputi:
   a. Melanjutkan peningkatan internalisasi budaya kepatuhan secara berkelanjutan di seluruh aspek operasional dan bisnis Bank;
   b. Melanjutkan penguatan fungsi pengawasan dan pengendalian risiko pada *second* dan *third line of defense;* dan
   c. Meciptakan pertumbuhan bisnis berkelanjutan yang dicapai dengan penerapan dan pengelolaan GCG;
2. Permodalan, yaitu dengan memperkuat dan/atau memelihara permodalan yang sehat guna menyerap risiko dan mendukung pertumbuhan bisnis yang berkelanjutan melalui peningkatan laba (organik) dan penerbitan obligasi subordinasi.
3. Pengembangan bisnis, meliputi:
   a. Menerbitkan 12 (dua belas) produk dasar dan 21 (dua puluh satu) produk lanjutan 5 (lima) produk lanjutan, 8 (delapan) produk lanjutan layanan elektronik, dan 8 (delapan) produk lanjutan layanan digital) guna mendorong pertumbuhan bisnis yang berkelanjutan dan pengembangan produk (*customer-centric*) serta meningkatkan *fee-based income;*
   b. Meningkatkan kampanye pemasaran (*marketing campaign*) guna memperluas basis nasabah simpanan terutama nasabah kecil untuk me ningkatkan porsi dana murah serta menekan *cost of fund;*
   c. Melanjutkan inisiatif-inisiatif kerja sama dalam pengembangan bisnis penyumbang *fee-based income* lain pada produk dan layanan *wealth management;* dan
   d. Meningkatkan efektivitas penanganan kredit bermasalah, kredit hapus buku, penyelesaian agunan yang diambil alih serta pemanfaatan aktiva tetap yang belum digunakan (properti terbengkalai) guna memelihara dan meningkatkan kualitas serta mengoptimalkan produktivitas aktiva dan meningkatkan pendapatan operasional selain bunga;
4. Sistem teknologi informasi, yaitu dengan memperkuat kapasitas dan kualitas layanan infrastruktur TI yang bisa menjamin keamanan dan menjaga kepercayaan nasabah guna mendukung kegiatan operasional;
5. Jaringan kantor, meliputi:
   a. Melanjutkan peningkatan evaluasi kinerja jaringan kantor cabang yang ada guna mencapai tingkat profitabilitas yang menguntungkan; dan
   b. Melakukan penambahan jaringan kantor untuk meningkatkan layanan nasabah serta memperluas pasar secara geografis dalam mendukung bisnis;
6. Sumber daya manusia dan organisasi, meliputi:
   a. Meningkatkan kualitas sumber daya manusia, penguatan perangkat organisasi melalui program pelatihan yang berkelanjutan, dan rekrutmen tenaga sesuai kebutuhan bisnis Bank dan regulasi; dan

Medium and Short-Term Plans

The Bank sets its short-term targets for the next one year and medium-term targets for the next 3 (three) years, as follows:

1. Strengthening GCG and risk management implementation, including:
   a. Continuing to improve the internalization of compliance culture in all aspects of the Bank's operations and business;
   b. Continuing to strengthen the supervision and risk control functions at the second and third lines of defense; and
   c. Creating sustainable business growth achieved through the implementation and management of GCG;
2. Capital, namely by strengthening and/or maintaining healthy capital to absorb risks and support sustainable business growth through increased (organic) profits and issuance of subordinated bonds.
3. Business development, including:
   a. Issuing 12 (twelve) basic products and 21 (twenty one) advanced products 5 (five) advanced products, 8 (eight) electronic service advanced products, and 8 (eight) digital service advanced products) to encourage sustainable business growth and product development (customer-centric) and increase fee-based income;
   b. Enhance marketing campaigns to expand the deposit customer base, especially small customers, to increase the portion of low-cost funds and reduce the cost of funds;
   c. Continue collaborative initiatives in developing other fee-based income contributing businesses in wealth management products and services; and
   d. Improve the effectiveness of handling non-performing loans, write-off loans, settlement of repossessed collateral and utilization of unused fixed assets (abandoned properties) to maintain and improve the quality and optimize asset productivity and increase operating income other than interest;
4. Information technology systems, namely by strengthening the capacity and quality of IT infrastructure services that can ensure security and maintain customer confidence to support operational activities;
5. Office network, including:
   a. Continuing to improve the performance evaluation of the existing branch office network in order to achieve a favorable level of profitability; and
   b. Expand the office network to improve customer service and expand the market geographically to support the business;
6. Human resources and organization, including:
   a. Improving the quality of human resources, strengthening organizational tools through continuous training programs, and recruitment of personnel according to the Bank's business needs and regulations; and

b. Meningkatkan kualitas sumber daya manusia dalam kompetisi yang dinamis melalui peningkatan *softskill* dan *hardskill*, program rekrutmen (*Officer Development Program*) dan pelatihan terencana dalam kurun waktu 3 (tiga) bulan sekali dan terpadu seperti kewajiban pemenuhan sertifikasi dan *refreshment;*

7. Menjaga dan meningkatkan nilai perusahaan bagi seluruh Pemegang Saham dan pemangku kepentingan.

b. Improving the quality of human resources in a dynamic competition through the improvement of soft skills and hard skills, recruitment programs (Officer Development Program) and planned training within a period of 3 (three) months and integrated such as the obligation to fulfill certification and refreshment;

7. Maintain and increase the value of the company for all Shareholders and stakeholders.

Pembelian Kembali Saham dan/atau Obligasi
Shares and/or Bonds Buy Back

Sepanjang tahun 2023, Bank Victoria tidak melakukan pembelian kembali saham maupun obligasi.

Throughout 2023, Bank Victoria did not conduct shares or bonds buy back.

Penyediaan Dana kepada Pihak Terkait dan/atau Penyediaan Dana Besar
Provision of Funds to Related Parties and/or Provision of Large Exposure

Bank menerapkan prinsip kehati-hatian dalam penyediaan dana kepada pihak terkait dan debitur dalam jumlah besar. Prinsip tersebut diimplementasikan melalui peninjauan mekanisme pelaksanaan sesuai kebijakan internal, mematuhi ketentuan Bank Indonesia mengenai Batas Maksimum Pemberian Kredit, dan diputuskan Dewan Komisaris secara independen.

The Bank implements the principle of prudence in providing funds to related party and debtors with large exposure, by reviewing the implementation mechanisms according to internal policies, complying with Bank Indonesia regulations on Legal Lending Limit Aspect, and having the decision made by the Board of Commissioners independently.

Pada tahun 2023, penyediaan dana kepada pihak terkait Bank dan juga terhadap debitur inti Bank (tidak terkait) sebagai berikut:

In 2023, the provision of funds to the Bank's related parties and also to the Bank's core debtors (non-related) are as follows:

Penyediaan Dana Provision of Fund	Debitur Debtor	Total (juta Rupiah / million Rupiah)
Individu Individual	900	21,973,320
Kepada Pihak Terkait To Related Parties	20	361,764
Kepada Pihak Tidak Terkait To Non-Related Parties	880	21,611,556
Kelompok Group	36	6,059,892
Total	**936**	**28,033,212**

Kepatuhan Perpajakan
Tax Compliance

Bank Victoria berkomitmen untuk mematuhi perundang-undangan dan ketentuan yang berlaku. Bentuk kepatuhan tersebut salah satunya diwujudkan dengan memenuhi kewajiban untuk membayar pajak. Bank wajib melakukan pemotongan/pemungutan pajak terhadap setiap objek kena pajak, seperti Pajak Penghasilan (PPh) karyawan dan Pajak Pertambahan Nilai dan lain-lain (PPN). Bank juga menyampaikan dokumen kewajiban perpajakan, seperti Surat Pemberitahuan Pajak (SPT) tahunan maupun bulanan, serta dokumen kewajiban ke lembaga regulator dengan tepat waktu. Jumlah pajak yang dibayarkan Bank selama tahun 2023 dapat dilihat pada bab Analisis dan Pembahasan Manajemen bagian Kontribusi kepada Negara.

Bank Victoria is committed to complying with the applicable laws and regulations, one of which is realized by fulfilling the obligation to pay taxes. The Bank is required to withhold/collect tax on every taxable object, such as employee Income Tax (PPh), Value Added Tax (VAT), and others. The Bank also submits tax obligation documents, such as annual and monthly Tax Returns (SPT), and obligation documents to regulatory institutions in a timely manner. The amount of tax paid by the Bank throughout 2023 can be seen in the Management Discussion and Analysis chapter in the Contribution to the State section.

Transparansi Kondisi Keuangan dan Non-Keuangan Bank yang Belum Diungkap dalam Laporan Lain
Transparency of the Bank's Financial and Non-Financial Conditions that Have Not Been Disclosed in Other Report

Bank telah melakukan transparansi terhadap Laporan Tahunan (keuangan dan non-keuangan) serta Laporan Keuangan Publikasi Triwulanan dan Laporan Keuangan Publikasi Bulanan dengan tepat waktu dan dipublikasikan di situs web Bank.

The Bank has carried out transparency on the (financial and non-financial) Annual Report as well as Quarterly Published Financial Statements and Monthly Published Financial Statements in a timely manner and published on the Bank's website.

Informasi Lain terkait Tata Kelola Bank
Other Information related to Bank Governance

Bank berupaya untuk mengelola dan menjalankan kegiatan bisnis dengan baik dan bersih, tanpa adanya intervensi dari pemilik ataupun pihak lainnya, serta perselisihan internal ataupun permasalahan lain, khususnya yang muncul sebagai dampak kebijakan remunerasi yang diterapkan oleh Bank. Sepanjang tahun 2023, Bank telah melakukan proses bisnis sesuai dengan pedoman pada prinsip-prinsip GCG, Kode Etik, Peraturan Perusahaan, serta peraturan perundang-undangan yang berlaku untuk mengurangi dampak negatif yang dihasilkan dari keputusan dan aktivitas operasional Bank.

The Bank strives to manage and carry out business activities properly and cleanly, without any intervention from the owner or other parties, as well as internal disputes or other problems, particularly those that arise as a result of the remuneration policies applied by the Bank. Throughout 2023, the Bank carried out business processes in accordance with guidelines on GCG principles, Code of Conduct, Company Regulations, and applicable laws and regulations to reduce negative impacts resulting from the Bank's operational decisions and activities.

Pernyataan dan Praktik *Bad Corporate Governance*
Statement and Practices of Bad Corporate Governance

Bank berkomitmen untuk menjalankan aktivitas bisnis perbankan yang bersih dan sehat, sehingga terhindar dari pelaksanaan aktivitas bisnis dan penerapan tata kelola yang tidak baik. Komitmen tersebut diungkapkan dengan pemenuhan aspek dari pernyataan dan praktik *bad corporate governance* berikut:

The Bank is committed to carrying out clean and sound banking business activities, and therefore, avoid bad business activities and bad governance implementation. This commitment is disclosed by fulfilling aspects of the statement and practices of bad corporate governance as follows:

Uraian	Praktik Practice	Description
Adanya laporan sebagai Bank yang mencemari lingkungan.	Nihil None	There is a report that the Bank pollutes the environment.
Perkara penting yang sedang dihadapi oleh Bank, anggota Direksi dan/atau anggota Dewan Komisaris yang sedang menjabat tidak diungkapkan dalam Laporan Tahunan.	Nihil None	Significant cases currently faced by the Bank, members of Board of Directors, and/or members of Board of Commissioners are not disclosed in the Annual Report.
Ketidakpatuhan dalam pemenuhan kewajiban perpajakan.	Nihil None	Non-compliance in fulfilling tax obligations.
Ketidaksesuaian penyajian Laporan Tahunan dan Laporan Keuangan dengan peraturan yang berlaku dan Standar Akuntasi Keuangan.	Nihil None	Inconsistency of presentation of Annual Report and Financial Statements with the the applicable regulations and Financial Accounting Standards.
Kasus terkait buruh dan karyawan.	Nihil None	Cases related to workers and employees.
Tidak terdapat pengungkapan segmen operasi.	Nihil None	There are no disclosures on operational segment.
Terdapat ketidaksesuaian antara Laporan Tahunan *hardcopy* dengan Laporan Tahunan *softcopy*.	Nihil None	There is inconsistency between Annual Report's hard copy and Annual Report's soft copy.

STRUKTUR PERMODALAN DAN MANAJEMEN RISIKO

Capital Structure and Risk Management





Pengungkapan Permodalan
Disclosure of Capital

Dalam rangka meningkatkan nilai tambah bagi pemangku kepentingan dan mematuhi persyaratan permodalan regulator, Bank Victoria secara konsisten mempertahankan struktur permodalan yang kuat sehingga dapat mendukung strategi pengembangan usaha secara berkelanjutan.

In order to increase added value for stakeholders and comply with regulatory capital requirements, Bank Victoria consistently maintains a strong capital structure so that it can support sustainable business development strategy.

Kebijakan Manajemen Permodalan

Kebijakan manajemen permodalan Bank Victoria bertujuan untuk memastikan keberlanjutan modal yang kuat, menciptakan struktur permodalan yang optimal, dan mematuhi ketentuan regulator. Kebijakan manajemen permodalan Bank mengacu pada:

1. Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tanggal 2 Februari 2016;
2. Peraturan Otoritas Jasa Keuangan No. 34/POJK.03/2016 tanggal 26 September 2016, Perubahan atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum; dan
3. Peraturan Otoritas Jasa Keuangan No. 27 Tahun 2022 tanggal 26 Desember 2022, Perubahan Kedua atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum.

Penetapan strategi dan kebijakan pengelolaan permodalan Bank Victoria disusun sebagai bagian dari Rencana Bisnis Bank dan disetujui oleh Direksi dan Dewan Komisaris.

Rencana permodalan Bank memastikan ketersediaan modal yang cukup dan penciptaan struktur permodalan yang optimal untuk mendukung strategi bisnis. Dalam perencanaannya, Bank mempertimbangkan:

1. Ketentuan permodalan minimum yang diwajibkan oleh regulator;
2. Kebutuhan modal untuk mendukung pertumbuhan usaha; serta
3. Pilihan-pilihan yang ada untuk meningkatkan permodalan dan untuk mencapai struktur permodalan yang optimal.

Pengelolaan modal juga mempertimbangkan kondisi ekonomi, usaha, dan pasar uang. Bank secara berkala melakukan penilaian kecukupan permodalan (*internal capital adequacy assessment process*/ICAAP) untuk mengevaluasi kondisi normal dan *stress* sebagai bagian dari pengawasan permodalan Bank.

Capital Management Policy

Bank Victoria's capital management policy aims to ensure strong capital sustainability, create an optimal capital structure, and comply with regulatory requirements. Capital management policy of the Bank refers to:

1. Financial Services Authority Regulation No. 11/ POJK.03/ 2016 dated 2 February 2016;
2. Financial Services Authority Regulation No. 34/POJK.03/2016 dated 26 September 2016, Amendments to Financial Services Authority Regulation No. 11/POJK.03/2016 on Capital Adequacy Ratio for Commercial Banks; and
3. Financial Services Authority Regulation No. 27 of 2022 dated 26 December 2022, on Second Amendment to Financial Services Authority Regulation No. 11/POJK.03/2016 on Capital Adequacy Ratio for Commercial Banks.

Establishment of strategies and policies of Bank Victoria's capital management is prepared as part of the Bank's Business Plan and approved by the Board of Directors and Board of Commissioners.

The Bank's capital plan ensures the availability of sufficient capital and create an optimal capital structure to support business strategy. In its planning, the Bank considers:

1. Minimum capital requirements required by regulators;
2. Capital requirements to support business growth; and
3. Existing options to increase capital and achieve optimal capital structure.

Capital management also considers economic, business, and money market conditions. The Bank periodically assesses capital adequacy (internal capital adequacy assessment process/ICAAP) to evaluate normal and stressful conditions as part of the Bank's capital monitoring.

Struktur Permodalan

Sesuai dengan ketentuan Otoritas Jasa Keuangan, struktur permodalan Bank Victoria terdiri dari:

1. Modal inti (*tier* 1), yang meliputi:
   a. Modal inti utama (*common equity tier* 1)
      Modal inti utama mencakup modal disetor, cadangan tambahan modal (*disclosed reserve*), dan faktor pengurang modal inti utama. Cadangan tambahan modal terdiri atas faktor penambah (pendapatan komprehensif lainnya dan cadangan tambahan modal lainnya) dan faktor pengurang (pendapatan komprehensif lainnya dan cadangan tambahan modal lainnya);
   b. Modal inti tambahan (*additional tier* 1)
2. Modal pelengkap (*tier* 2)
   Modal pelengkap (*tier* 2) meliputi cadangan umum Penyisihan Penghapusan Aset (PPA) atas aset produktif yang wajib dibentuk (paling tinggi 1,25% Aset Tertimbang Menurut Risiko (ATMR) Risiko Kredit).

Total modal Bank pada tanggal 31 Desember 2023 sebesar Rp3,82 triliun, yang didominasi oleh modal inti *(tier I)* Bank sebesar Rp3,29 triliun. Apabila dibandingkan dengan total modal pada tanggal 31 Desember 2022 yang sebesar Rp3,88 triliun, maka terjadi penurunan sebesar 1,45%. Penurunan tersebut terjadi pada komponen modal pelengkap *(tier II)* dengan penurunan sebesar 21,02%. Di sisi lain, komponen modal inti *(tier I)* pada tahun 2023 mengalami peningkatan sebesar 2,68% menjadi sebesar Rp3,29 triliun jika dibandingkan dengan tahun sebelumnya.

Dengan struktur permodalan tersebut, rasio Kewajiban Penyediaan Modal Minimum (KPMM) pada tanggal 31 Desember 2023 secara individual menjadi sebesar 19,95% dibandingkan tahun sebelumnya sebesar 21,97%.

Kecukupan Permodalan

Kecukupan permodalan Bank Victoria senantiasa sejalan dan menyesuaikan ketentuan regulasi Bank Indonesia dan Otoritas Jasa Keuangan yaitu Basel II dan Basel III (lebih dikenal dengan Basel III *reforms*) dalam rangka memastikan Bank dapat menjaga kecukupan permodalannya yang sifatnya lebih sensitif dan dapat men-*cover* risiko-risiko utama pada kegiatan perbankan dengan tetap memberikan *return* bagi pemangku kepentingan, di antaranya:

1. Pilar 1 (*Minimum Capital Requirements*)
   Sesuai dengan ketentuan regulasi, secara umum, metodologi yang digunakan dalam menilai kecukupan dan kebutuhan modal untuk risiko kredit, risiko pasar, dan risiko operasional.
2. Pilar 2 *(Supervisory Review Process)*
   Bank Victoria telah menerapkan *Internal Capital Adequacy Assessment Process* (ICAAP), yaitu proses untuk menetapkan kecukupan modal yang sesuai dengan profil risiko Bank, dan menetapkan strategi untuk memelihara tingkat permodalan.

Capital Structure

Pursuant to the provisions of Financial Services Authority, Bank Victoria's capital structure consists of:

1. Tier 1, which includes:
   a. Common equity tier 1
      Common equity tier 1 includes paid-up capital, disclosed reserve and impairment factor for common equity tier 1. Additional capital reserves consist of additional factors (other comprehensive income and other additional capital reserves) and deduction factors (other comprehensive income and other additional capital reserves);
   b. Additional tier 1
2. Tier 2
   Tier 2 includes general reserves of Allowance for Asset Losses (PPA) for productive assets that must be formed (a maximum of 1.25% Risk Weighted Assets (ATMR) Credit Risk).

The Bank's total capital on 31 December 2023 was Rp3.82 trillion, which was dominated by the Bank's core capital (tier I) of Rp3.29 trillion. When compared to the total capital on 31 December 2022 which was Rp3.88 trillion, there was a decrease of 1.45%. The decrease occurred in the supplementary capital (tier II) component of 21.02%. On the other hand, the core capital (tier I) component in 2023 increased by 2.68% to Rp3.29 trillion compared to that of the previous year.

With such capital structure, the individual Minimum Capital Adequacy Ratio (CAR) on 31 December 2023 was 19.95% compared to that of previous year of 21.97%.

Capital Adequacy

Bank Victoria's capital adequacy is constantly in line with and adjusts to regulations of Bank Indonesia and Financial Services Authority, namely Basel II and Basel III (widely known as Basel III reforms), to ensure that the Bank can maintain its capital adequacy, which is more sensitive, to cover the main risks in banking activities while continuing to provide returns for stakeholders, including:

1. Pilar 1 (Minimum Capital Requirements)
   The method generally used for assessing capital adequacy and requirements for credit risk, market risk, and operational risk, which follows regulatory provisions.
2. Pilar 2 (Supervisory Review Process)
   Bank Victoria has implemented the Internal Capital Adequacy Assessment Process (ICAAP), which is a process to determine the capital adequacy according to the Bank's risk profile and to determine a strategy to maintain capital rating.

3. Pilar 3 *(Market Discipline)*
   Bank Victoria menerapkan disiplin pasar melalui transparansi dan pengungkapan atas informasi keuangan Bank.

Penyesuaian terhadap implementasi Basel III, regulator telah mengeluarkan ketentuan mengenai kewajiban penyediaan modal minimum bank umum, di mana Bank wajib membentuk tambahan modal sebagai penyangga (*buffer*). Tambahan modal tersebut berupa:

1. *Capital Conservation Buffer*
   Penyangga untuk mengantisipasi terjadinya kerugian pada periode krisis.
2. *Countercyclical Buffer*
   Penyangga untuk mengantisipasi terjadinya kerugian apabila pertumbuhan kredit perbankan berlebihan yang berpotensi mengganggu stabilitas sistem keuangan.
3. *Capital Surcharge* untuk *Domestic Systemically Important Bank* (D-SIB).

Penyangga untuk mengurangi dampak negatif terhadap stabilitas sistem keuangan dan perekonomian apabila terjadi kegagalan Bank yang berdampak sistemik, melalui peningkatan kemampuan Bank dalam menyerap kerugian.

Bank Victoria telah menerapkan perhitungan kewajiban membentuk tambahan modal sebagai penyangga (*buffer*) dalam Kewajiban Penyedian Modal Minimum (KPMM) sesuai dengan ketentuan regulator. Sebagai Bank KBMI I (Kelompok Bank berdasarkan Modal Inti), Bank Victoria tidak diwajibkan untuk menyediakan *capital conservation buffer* karena ketentuan penyediaan modal tersebut berlaku untuk Bank KBMI II, KBMI III, dan KBMI IV.

Pengungkapan permodalan Bank Victoria sebagai berikut:

1. Tabel Utama (*Key Metrics*).
2. Tabel Perbedaan antara Cakupan Konsolidasi dan *Mapping* pada Laporan Keuangan sesuai Standar Akuntansi Keuangan dengan Kategori Risiko sesuai dengan Ketentuan Otoritas Jasa Keuangan Kategori Risiko (LI1).
3. Tabel Perbedaan Utama antara Nilai Tercatat sesuai Standar Akuntansi Keuangan dengan Nilai Eksposur sesuai dengan Ketentuan Otoritas Jasa Keuangan (LI2).
4. Tabel Penjelasan Mengenai Perbedaan antara Nilai Eksposur sesuai Standar Akuntansi Keuangan dengan Ketentuan Otoritas Jasa Keuangan (LIA).
5. Tabel Komposisi Permodalan (CC1).
6. Tabel Rekonsiliasi Permodalan (CC2).
7. Tabel Fitur Utama Instrumen Permodalan dan Instrumen TLAC - *Eligible* (CCA).
8. Tabel Rasio Pengungkit – Laporan Kewajiban Pemenuhan Rasio Pengungkit.
9. Tabel Rasio Pengungkit – Laporan Perhitungan Rasio Pengungkit.

3. Pilar 3 (Market Discipline)
   Bank Victoria applies market discipline through transparency and disclosure of the Bank's financial information.

Adjusting to the implementation of Basel III, the regulator has issued a provision on minimum capital adequacy ratio for commercial bank, in which the Bank is required to establish additional capital as a buffer. The additional capital can be in the form of:

1. Capital Conservation Buffer
   A buffer to anticipate a loss in crisis period.
2. Countercyclical Buffer
   A buffer to anticipate losses in the event of excessive banking credit growth that potentially interferes with the financial system stability.
3. Capital Surcharge for Domestic Systemically Important Bank (D-SIB).

A buffer to reduce negative impacts on the financial system stability and economy in the event of Bank failure that has systemic impact, through the improvement of the Bank's ability to absorb losses.

Bank Victoria has applied the calculation of the requirement to form additional capital as a buffer in the Capital Adequacy Ratio (CAR) in accordance with the regulatory provisions. As a bank of KBMI I (Bank Groups Based on Core Capital I), Bank Victoria is not required to provide capital conservation buffer because the capital requirement provision applies to banks of KBMI II, KBMI III, and KBMI IV.

Bank Victoria's disclosure of capital is as follows:

1. Main Table (Key Metrics).
2. Table of Difference between Consolidated and Mapping Coverage on the Financial Statements in Accordance with the Financial Accounting Standards with Risk Categories in Accordance with the Financial Services Authority Provisions for Risk Category (LI1).
3. Table of Key Differences between Carrying Value in Accordance with the Financial Accounting Standards and Exposure Value in Accordance with the Financial Services Authority Regulations (LI2).
4. Table of Explanation on the Differences between the Exposure Values in accordance with the Financial Accounting Standards and Financial Services Authority Provisions (LIA).
5. Table of Capital Composition (CC1).
6. Table of Capital Reconciliation (CC2).
7. Table of Key Features of Capital instrument and TLAC instrument - Eligible (CCA).
8. Table of Leverage Ratio - Leverage Ratio Compliance Report.
9. Table of Leverage Ratio - Leverage Ratio Calculation Report.

Manajemen Risiko
Risk Management

Kegiatan usaha Bank selalu dihadapkan pada risiko-risiko yang berkaitan erat dengan fungsinya sebagai lembaga intermediasi keuangan dan aktivitas perbankan lainnya yang dilakukan untuk menunjang tujuan Bank. Perkembangan bisnis yang pesat menyebabkan risiko kegiatan usaha semakin kompleks, yang selanjutnya menuntut Bank untuk menerapkan manajemen risiko yang sesuai dengan standar yang merujuk pada ketentuan regulator dan *best practice* yang diterapkan di perbankan agar dapat mengatasi kompleksitas risiko tersebut. Manajemen risiko merupakan aspek penting agar semua pemangku kepentingan di Bank menjadi lebih sadar akan risiko (*risk awareness*) dan mengerti dengan jelas mengenai ekspektasi dan permasalahan risiko yang akan dihadapi serta dapat dikelola dengan baik. Bank Victoria secara aktif meningkatkan implementasi manajemen risiko untuk mengidentifikasi, mengukur, memantau, dan mengendalikan risiko dengan tepat guna mencegah gangguan terhadap kelangsungan usaha Bank.

The Bank's business activities are always faced with risks that are closely related to its function as a financial intermediary and other banking activities carried out to support the Bank's objectives. Rapid business development causes the risks of business activities become increasingly complex, which in turn requires the Bank to implement risk management according to standards by referring to regulatory provisions and best practices applied in banking in order to overcome the complexity of such risks. Risk management is an important aspect so that all stakeholders in the Bank are more aware of risk (risk awareness), clearly understand the expectations and risk problems that will be faced, and manage them properly. Bank Victoria actively improves its risk management implementation to identify, measure, monitor, and properly control risks to prevent disruption to the Bank's business continuity.

Dasar Penerapan Manajemen Risiko

Penerapan manajemen risiko Bank didasarkan pada beberapa peraturan berikut:

1. Peraturan Otoritas Jasa Keuangan No. 4/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum;
2. Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum;
3. Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum;
4. Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum;
5. Surat Edaran Otoritas Jasa Keuangan No. 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum; dan
6. Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2017 tentang Penilaian Tingkat Kesehatan Bank Umum.

Basis of Risk Management Implementation

The Bank's risk management implementation is based on the following regulations:

1. Financial Services Authority Regulation No. 4/POJK.03/2016 on Sound Level Assessment for Commercial Banks;
2. Financial Services Authority Regulation No. 18/POJK.03/2016 on Implementation of Risk Management for Commercial Banks;
3. Financial Services Authority Regulation No. 17 of 2023 on Implementation of Governance for Commercial Banks;
4. Financial Services Authority Circular No. 34/SEOJK.03/2016 on Risk Management Implementation for Commercial Banks;
5. Financial Services Authority Circular No. 13/SEOJK.03/2017 on Implementation of Governance for Commercial Banks; and
6. Financial Services Authority Circular No. 14/SEOJK.03/2017 on Sound Level Assessment for Commercial Banks.

Penerapan Manajemen Risiko Bank

Bank senantiasa berupaya untuk meningkatkan kualitas implementasi manajemen risiko guna menjadi mitra bisnis yang terpercaya dengan menyediakan kerangka kerja manajemen risiko, mempromosikan *risk culture*, serta menarik talenta untuk mendukung pertumbuhan bisnis yang berkelanjutan. Dalam penerapan manajemen risiko, Bank berpedoman pada Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, di mana Bank menerapkan manajemen risiko secara efektif melalui 4 (empat) pilar yang terdiri dari:

Implementation of Bank Risk Management

The Bank always strives to improve the quality of risk management implementation to become a trusted business partner by providing risk management framework, promoting risk culture, and attracting talent to support sustainable business growth. In implementing risk management, the Bank refers to the Financial Services Authority Regulation No. 18/POJK.03/2016 on Implementation of Risk Management for Commercial Banks, in which the Bank effectively implements risk management through 4 (four) pillars consisting of:

1. Pengawasan aktif Dewan Komisaris dan Direksi;
2. Kecukupan kebijakan, prosedur, dan penetapan limit manajemen risiko;
3. Kecukupan proses identifikasi, pengukuran, pemantauan, pengendalian, dan sistem informasi manajemen risiko; dan
4. Sistem pengendalian internal terhadap penerapan manajemen risiko.

Pengawasan Aktif Dewan Komisaris dan Direksi

Tata kelola manajemen risiko senantiasa mengacu pada Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Dewan Komisaris dan Direksi secara aktif melakukan pengawasan dan mitigasi serta mengembangkan budaya manajemen risiko di Bank. Adapun tugas dan tanggung jawab Dewan Komisaris sebagai berikut:

1. Melakukan pengawasan untuk kepentingan Bank atas kebijakan dan jalannya pengurusan Direksi, memberikan nasihat kepada Direksi, dan bertanggung jawab atas pengawasan tersebut;
2. Melaksanakan tugas, wewenang, dan tanggung jawab dengan iktikad baik dan dengan prinsip kehati-hatian; dan
3. Memberikan arahan, memantau, dan mengevaluasi pelaksanaan tata kelola, manajemen risiko, dan kepatuhan secara terintegrasi serta kebijakan strategis Bank.

Dewan Komisaris dalam menjalankan fungsinya sebagai pengawasan secara aktif dibantu oleh Komite Audit, Komite Pemantau Risiko, dan Komite Nominasi dan Remunerasi.

Sementara itu, tugas dan tanggung jawab Direksi sebagai berikut:

1. Menyusun kebijakan dan strategi manajemen risiko secara tertulis dan komprehensif;
2. Memiliki tanggung jawab atas pelaksanaan kebijakan manajemen risiko dan eksposur risiko yang diambil oleh Bank secara keseluruhan;
3. Mengevaluasi dan memutuskan transaksi yang memerlukan persetujuan Direksi;
4. Mengembangkan budaya manajemen risiko pada seluruh jenjang organisasi;
5. Memastikan peningkatan kompetensi sumber daya manusia yang terkait dengan manajemen risiko; dan
6. Memastikan bahwa fungsi manajemen risiko telah beroperasi secara independen.

Direksi dibantu oleh *Executive Committee* terkait Manajemen Risiko, seperti Komite Manajemen Risiko, Komite Kredit, dan Komite Kebijakan Perkreditan. Penerapan manajemen risiko bukan hanya tanggung jawab Dewan Komisaris dan Direksi, tetapi juga harus dilaksanakan oleh unit kerja lainnya di bawah Direksi, seperti Satuan Kerja Manajemen Risiko, Satuan Kerja Kepatuhan, SKAI & *Anti Fraud*, dan *Risk Taking Unit*.

1. Active monitoring of Board of Commissioners and Board of Directors;
2. Adequacy of risk management policies, procedures, and limit setting;
3. Adequacy of process of risk identification, measurement, monitoring, and managament, as well as risk management information system; and
4. Internal control system on risk management implementation.

Active Monitoring of Board of Commissioners and Board of Directors

Risk management governance refers to the Financial Services Authority Regulation No. 17 of 2023 on Implementation of Governance for Commercial Banks, the Board of Commissioners and Board of Directors actively supervise, mitigate, and develop risk management culture within the Bank. Duties and responsibilities of the Board of Commissioners are as follows:

1. Supervise in the interests of the Bank over the policies and management of the Board of Directors, provide advice to the Board of Directors, and be responsible for such supervision;
2. Perform duties, authorities, and responsibilities in good faith and with prudential principles; and
3. Provide direction, monitor, and evaluate the implementation of integrated governance, risk management, and compliance, as well as the Bank's strategic policies.

In performing its supervisory function, the Board of Commissioners is actively assisted by the Audit Committee, Risk Monitoring Committee, and Nomination and Remuneration Committee.

Meanwhile, duties and responsibilities of the Board of Directors are as follows:

1. Develop written and comprehensive risk management policies and strategies;
2. Is responsible for the implementation of risk management policies and risk exposure taken by the Bank as a whole;
3. Evaluate and decide on transactions requiring approval from the Board of Directors;
4. Develop a risk management culture at all levels of the organization;
5. Ensure increased competency of human resources related to risk management; and
6. Ensure that the risk management function operates independently.

The Board of Directors is assisted by an Executive Committee related to Risk Management, such as the Risk Management Committee, Credit Committee, and Credit Policy Committee. Risk management implementation is not only the responsibility of the Board of Commissioners and Board of Directors, but also required to be implemented by other work units under the Board of Directors, such as the Risk Management Unit, Compliance Unit, SKAI & Anti-Fraud, and Risk Taking Unit.

Kecukupan Kebijakan, Prosedur, dan Penetapan Limit Manajemen Risiko

Aktivitas operasional Bank telah didukung dengan kerangka manajemen risiko yang mencakup kebijakan dan prosedur penerapan manajemen risiko sejalan dengan visi, misi, strategi bisnis Bank, tingkat risiko yang diambil dan toleransi risiko, serta limit tanpa mengabaikan kemampuan modal Bank untuk dapat menyerap eksposur risiko.

Kebijakan dan prosedur penerapan manajemen risiko merupakan arahan tertulis pada aktivitas fungsional Bank yang dalam penyusunannya juga telah diatur mengenai penetapan limit untuk masing-masing aktivitas, baik pada level portofolio maupun transaksional. Seluruh kebijakan dan prosedur di Bank merupakan bentuk pengelolaan risiko yang melekat pada setiap aktivitas operasional di Bank yang dikinikan secara berkala dengan memperhatikan kompleksitas kegiatan usaha, profil risiko, dan keterkaitan antar risiko, serta peraturan yang ditetapkan otoritas dan/atau praktik perbankan yang sehat.

Dalam rangka pengendalian risiko secara efektif, kebijakan dan prosedur didasarkan pada strategi manajemen risiko dan dilengkapi dengan toleransi risiko dan limit risiko. Penetapan toleransi dan limit risiko telah memperhatikan tingkat risiko yang akan diambil dan strategi secara keseluruhan. Perihal penetapan limit didasarkan atas limit secara keseluruhan, limit per jenis risiko, dan limit per aktivitas fungsional tertentu yang memiliki eksposur risiko disesuaikan dengan kompleksitas dan usaha Bank serta kepatuhan terhadap ketentuan yang berlaku. Sedangkan, dalam penyusunan dan pengajuan limit diusulkan oleh unit kerja (*risk taking unit*) dan disampaikan kepada *Risk Management/Integrated* untuk dievaluasi dan diajukan kepada Komite Manajemen Risiko. Selanjutnya, toleransi dan limit risiko direkomendasikan kepada Direktur Utama untuk mendapatkan persetujuan dengan sepengetahuan Dewan Komisaris.

Kecukupan Proses Identifikasi, Pengukuran, Pemantauan, Pengendalian, dan Sistem Informasi Manajemen Risiko

Proses manajemen risiko meliputi tahapan berikut:

1. Identifikasi
   Identifikasi risiko merupakan proses untuk menentukan risiko yang melekat pada aktivitas Bank berpotensi menghambat pencapaian tujuan. Identifikasi risiko Bank dilakukan melalui analisis terhadap seluruh jenis risiko, terutama kompleksitas dan karakteristik risiko yang melekat yang berpotensi merugikan Bank.
2. Pengukuran
   Tujuan pengukuran risiko adalah untuk mengukur tingkat risiko yang melekat pada aktivitas Bank dan dampaknya terhadap permodalan, pendapatan, dan/atau strategi Bank. Pengukuran risiko Bank dilakukan secara berkala, baik untuk produk dan portofolio maupun seluruh aktivitas bisnis Bank yang bertujuan untuk mengukur eksposur risiko Bank sebagai acuan di dalam pengendalian risiko.

Adequacy of Policies, Procedures, and Limit Establishment of Risk Management

The Bank's operational activities are supported by risk management framework that includes policies and procedures for implementing risk management in line with the Bank's vision, mission, business strategy, risk appetite, and risk tolerance, as well as limits without compromising the Bank's capital ability to absorb risk exposure.

Policies and procedures for implementing risk management are written directions for the Bank's functional activities which in their preparation also stipulate the limit establishment for each activity, both at portfolio and transactional levels. All policies and procedures at the Bank are a form of risk management inherent in every operational activity at the Bank, updated periodically by considering the complexity of business activities, risk profile, interrelationship between risks, and regulations set by the authorities, and/or sound banking practices.

To control risk effectively, policies and procedures are based on risk management strategies and equipped with risk tolerances and risk limits. Determination of risk tolerance and limits by considering the level of the risk appetite and overall strategy. Limits are determined based on overall limits, limits per type of risk, and limits per certain functional activities that have risk exposure adjusted to the Bank's complexity and business as well as compliance with applicable regulations. Whereas, limits are prepared and proposed by risk taking unit and submitted to the Risk Management/Integrated to be evaluated and proposed to the Risk Management Committee. Furthermore, risk tolerance and risk limits are recommended to the President Director for approval under acknowledgment of the Board of Commissioners.

Adequacy of Identification, Measurement, Monitoring, and Control Processes, as well as Risk Management Information System

The risk management process includes the following stages:

1. Identification
   Risk identification is a process to determine inherent risks within the Bank's activities with potential to hinder the achievement of the Bank's objectives. The Bank's risk identification is carried out through the analysis of all types of risk, particularly the complexity and characteristics of inherent risks that may potentially harm the Bank.
2. Measurement
   The risk measurement is aimed to measure the level of inherent risk within the Bank's activities and its impact on the Bank's capital, income, and/or strategy. The Bank's risk measurement is carried out periodically, either for products or portfolios or all business activities intended to measure the Bank's risk exposure as a reference in risk control.

3. Pemantauan
   Pemantauan risiko adalah proses untuk mengetahui, mengevaluasi potensi tingkat risiko dan efektivitas respons yang dijalankan di Bank. Pemantauan risiko Bank antara lain mencakup besarnya eksposur risiko, toleransi risiko, kepatuhan limit internal, hasil *stress testing*, dan konsistensi pelaksanaan dengan kebijakan dan prosedur yang ditetapkan dan peraturan terkait eskternal lainnya. Pemantauan didukung oleh sistem informasi manajemen risiko dan disesuaikan dengan kebutuhan dalam rangka penerapan manajemen risiko yang efektif.
4. Pengendalian
   Pengendalian risiko adalah metode yang digunakan Bank untuk mengevaluasi potensi kerugian dan tindakan yang dilakukan untuk menerima, mengurangi, mengalihkan, atau menghilangkan risiko. Pengendalian risiko Bank dilakukan antara lain dengan memberikan tindak lanjut atas risiko yang bersifat material dan signifikan, pengawasan melekat, dan pelaksanaan audit internal secara berkala.

3. Monitoring
   Risk monitoring is a process for finding out, evaluating the level of potential risk, and effectiveness of responses carried out at the Bank. The Bank's risk monitoring includes the magnitude of risk exposure, risk tolerance, internal limit compliance, stress testing results, and consistent implementation with the established policies, procedures, and other external related regulations. Monitoring is supported by the risk management information system, which is tailored to needs in order to implement effective risk management.
4. Control
   Risk control is the method used by the Bank to evaluate potential loss and actions to be taken to accept, reduce, transfer, or eliminate risks. The risk control of the Bank is carried out by following up on material and significant risks, attached monitoring, and conducting internal audits periodically.

Penerapan proses manajemen risiko didukung oleh sistem informasi yang memadai dan dikembangkan sesuai dengan kebutuhan Bank dalam rangka penerapan manajemen risiko yang efektif. Sistem informasi manajemen risiko dan informasi yang dihasilkan disesuaikan dengan karakteristik dan kompleksitas kegiatan usaha Bank, serta adaptif terhadap perubahan.

The risk management process is supported by information system that is adequate and developed in accordance with the Bank's needs in order to implement effective risk management. The risk management information system and the information generated are adapted to the characteristics and complexity of the Bank's business activities, as well as adaptive to changes.

Sistem Pengendalian Internal terhadap Penerapan Manajemen Risiko

Bank menerapkan sistem pengendalian *intern* secara efektif dan mengacu kepada kebijakan dan prosedur yang ditetapkan. Prinsip pemisahan fungsi harus memadai dan dilaksanakan secara konsisten. Sistem pengendalian internal dalam penerapan manajemen risiko sekurang-kurangnya mencakup:

1. Pengelolaan dan pengendalian risiko yang melekat pada kegiatan usaha Bank;
2. Pelaporan keuangan dan kegiatan operasional yang akurat dan tepat waktu;
3. Peningkatan kepatuhan terhadap ketentuan yang berlaku;
4. Pengurangan dampak kerugian keuangan, penyimpangan termasuk kecurangan (*fraud*) dan pelanggaran;
5. Peningkatan efektivitas organisasi dan meningkatkan efisiensi biaya;
6. Pengelolaan risiko agar tetap dalam batas toleransi (*risk tolerance*) dan *risk appetite* sesuai ukuran dan kompleksitas usaha;
7. Pengkajian ulang terhadap sistem informasi manajemen risiko; dan
8. Verifikasi dan pengkajian ulang secara berkala dan berkesinambungan terhadap permasalahan yang bersifat material dan tindakan untuk memperbaiki permasalahan yang terjadi.

Internal Control System on Risk Management Implementation

The Bank implements an effective internal control system, which refers to the established policies and procedures. The principle of separation of functions shall be adequate and implemented consistently. The internal control system in implementing risk management must at least include:

1. Managing and controlling risk inherent in the Bank's business activities;
2. Accurate and timely reporting of financial and operational activities;
3. Improving compliance with applicable regulations;
4. Reducing the impact of financial loss, irregularities including fraud and violation;
5. Improving organization effectiveness and improving cost efficiency;
6. Managing risk in order to remain within the limits of risk tolerance and risk appetite according to the business size and complexity;
7. Reviewing the risk management information system; and
8. Verifying and reviewing material problems and actions to rectify occurring problems, periodically and continuously.

Evaluasi terhadap efektivitas penerapan sistem pengendalian internal dilakukan secara terus menerus dan berkesinambungan agar Bank dapat memantau dan memitigasi risiko-risiko yang

Evaluation of the effectiveness of internal control system is performed continuously and ongoing so that the Bank can monitor and mitigate the risks effectively. Such evaluation result

dihadapi secara efektif. Hasil evaluasi tersebut dijadikan dasar untuk perbaikan dan penyempurnaan sistem ataupun kebijakan pengendalian internal.

Seluruh manajemen dan karyawan Bank Victoria memiliki peran dan tanggung jawab untuk menerapkan, mematuhi, serta meningkatkan sistem pengendalian internal di Bank Victoria. Hal ini tercermin dari konsep *three lines of defenses* dalam pengelolaan risiko yang telah diimplementasikan, di mana pengelolaan risiko dilakukan oleh seluruh lini organisasi.

Strategi Penerapan Manajemen Risiko

Perumusan strategi manajemen risiko Bank diselaraskan dengan strategi bisnis secara keseluruhan dengan memperhatikan *risk appetite* dan *risk tolerance* melalui pengelolaan eksposur risiko Bank sesuai dengan kebijakan dan prosedur, peraturan dan perundang-undangan, serta ketentuan lain yang berlaku. Sejalan dengan Visi dan Misi, Bank merumuskan strategi manajemen risiko sesuai dengan Rencana Bisnis Bank, di antaranya mengembangkan transformasi digital dan tetap menjaga kinerja usaha Bank yang secara umum tertuang dalam Rencana Bisnis Bank dan telah disetujui oleh manajemen Bank.

Penerapan strategi manajemen risiko dilakukan untuk mendukung pencapaian Rencana Bisnis Bank, di antaranya melalui:

1. Peningkatan pengelolaan risiko Bank yang berkualitas;
2. Penyempurnaan kebijakan atas penerapan manajemen risiko Bank; dan
3. Proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko di setiap jenjang organisasi.

Strategi manajemen risiko senantiasa dilakukan Bank, baik dari segi struktur organisasi dan sumber daya manusia, kebijakan dan prosedur, maupun sistem pendukung agar sesuai dengan perkembangan aktivitas perbankan yang semakin beragam dan kompleks. Usaha tersebut dilakukan Bank agar dapat mengelola risiko yang dihadapi, melakukan upaya pencegahan atau mitigasi, serta mencadangkan modal, sehingga membantu Bank dalam merencanakan arah pertumbuhan bisnis di masa depan. Perbaikan dan peningkatan pengelolaan dilakukan melalui:

1. Menjaga eksposur risiko secara keseluruhan (*aggregate*) maupun per jenis risiko dengan mempertimbangkan keterkaitan antar risiko;
2. Evaluasi dan penyempurnaan pengukuran risiko secara berkala atau sewaktu-waktu apabila diperlukan untuk memastikan kesesuaian akurasi, kewajaran, serta prosedur yang digunakan untuk mengukur risiko; dan
3. Analisa dan evaluasi kecenderungan terhadap perubahan faktor-faktor yang memengaruhi kinerja Bank, baik faktor internal maupun eksternal.

is used as a basis for improving and refining the system and internal control policy.

All management and employees of Bank Victoria have the role and responsibility to implement, comply with, and improve the internal control system at Bank Victoria. This is reflected in the concept of three lines of defenses in risk management that has been implemented, where risk management is carried out by all lines of the organization.

Risk Management Implementation Strategy

Formulation of the Bank's risk management strategy is aligned with the overall business strategy by considering risk appetite and risk tolerance through the Bank's risk exposure management in accordance with policies and procedures, laws and regulations, and other applicable provisions. In line with the Vision and Mission, the Bank formulates a risk management strategy in accordance with the Bank's Business Plan, including developing digital transformation and maintaining the Bank's business performance, which is generally stated in the Bank's Business Plan and has been approved by the Bank management.

Implementation of risk management strategy is conducted to support the achievement of the Bank's Business Plan, among others through:

1. Improving the Bank's risk management quality;
2. Improvement of Bank risk management implementation policies; and
3. The process of identifying, measuring, monitoring, and controlling risks at every level of the organization.

The Bank constantly performs risk management strategy, either on the organizational structure and human resources, policy and procedure, or on the supporting system to be in line with the development of banking's activities that are more various and complex. The effort is made by the Bank in order to manage the risks, to prevent and mitigate, and to reserve capital to assist the Bank in planning the future direction of the business growth. Improvement and refinement of risk management are conducted as follows:

1. Maintaining an aggregate risk exposure or per type of risk by considering the interrelationships among the risks;
2. Evaluating and refining the risk measurement on a regular basis or at any time as necessary to ensure conformity of accuracy, reasonableness, and procedures used to measure risks; and
3. Analyzing and evaluating trends towards changes in factors affecting the Bank's performance, both internal and external factors.

Pada prinsipnya, pengelolaan risiko dilakukan secara proaktif guna mencapai pertumbuhan kinerja keuangan maupun kelangsungan bisnis Bank yang sehat dan berkelanjutan serta memelihara tingkat *risk adjusted return* secara optimal sesuai dengan *risk appetite* yang ditetapkan.

In principle, risk management is carried out proactively in order to achieve sound and sustainable growth in financial performance and business continuity of the Bank and to maintain an optimal level of risk adjusted return in accordance with the established risk appetite.

Struktur Tata Kelola Risiko

Penerapan manajemen risiko bermanfaat untuk melakukan analisis kemungkinan adanya risiko yang akan dihadapi saat ini maupun yang akan datang. Dalam praktiknya, Bank secara berkala melakukan kaji ulang melalui evaluasi kepada unit kerja. Evaluasi dilakukan dengan tujuan agar Bank mampu mengidentifikasi setiap risiko yang berpotensi muncul dan berdampak signifikan. Proses evaluasi pelaksanaan manajemen risiko menggunakan pendekatan berbasis risiko dan dilakukan oleh *Risk Management*, bekerja sama dengan seluruh unit kerja.

Risk Governance Structure

Risk management is useful to analyze the possible risks that may be faced in the present or future. The Bank periodically reviews by evaluating the work units. The evaluation is conducted with the aim of enabling the Bank to identify any potential risks that may arise and have a significant impact. Risk management evaluation process uses risk-based approach and is performed by Risk Management, in coordination with all the work units.

Dalam penerapannya, struktur dengan pembagian tugas dan tanggung jawab dalam proses pengelolaan risiko dibagi menjadi 3 (*three line of defense*) yang meliputi:

1. Lini 1: memiliki anggota dan mengelola risiko sehari-hari yang melekat dalam bisnis dan/atau kegiatannya, termasuk pengambilan risiko. Termasuk mengidentifikasi, menilai, mengendalikan, memitigasi, memantau, dan melaporkan eksposur risikonya dan memastikan bahwa hal tersebut dalam batasan yang telah ditetapkan dalam strategi risiko, *risk tolerance*, *risk appetite*, serta kerangka kerja, kebijakan dan prosedur manajemen risiko. Merancang dan melaksanakan aktivitas dan kontrol dalam *end-to-end process;*
2. Lini 2: menetapkan dan memiliki kerangka kerja, kebijakan dan prosedur manajemen risiko untuk mengidentifikasi, menilai, mengendalikan, memitigasi, memantau, dan melaporkan risiko tertentu yang menjadi tanggung jawab fungsi tersebut. Menyediakan tata kelola risiko dan pengawasan secara keseluruhan atas kerangka kerja manajemen risiko, termasuk pemantauan dan pelaporan eksposur risiko secara keseluruhan dari Bank. Mengkaji, menganalisis, dan mengevaluasi penilaian risiko serta efektivitas pengelolaan risiko yang dilakukan oleh Lini 1; dan
3. Lini 3: menyediakan *reasonable assurance* melalui penilaian independen, tinjauan dan validasi (kerangka kerja, kebijakan, dan perangkat manajemen risiko cukup kuat dan konsisten dengan standar peraturan yang berlaku, kontrol untuk memitigasi risiko sudah cukup dan efektif dijalankan oleh Lini 1, pengawasan yang memadai oleh Lini 2 terhadap Lini 1).

In its application, the structure and division of tasks and responsibilities in risk management process are divided into 3 (three lines of defense) which include:

1. Line 1: has members and manages day-to-day risks inherent in business and/or its activities, including risk taking. This includes identifying, assessing, controlling, mitigating, monitoring, and reporting risk exposures, as well as ensuring that such matters are within the limits set in risk strategy, risk tolerance, risk appetite, and risk management framework, policies, and procedures. Designs and implements activities and controls in end-to-end processes;
2. Line 2: establishes and has risk management framework, policies, and procedures to identify, assess, control, mitigate, monitor, and report on specific risks for which the function is responsible. Provides overall risk governance and supervision of risk management framework, including monitoring and reporting the Bank's overall risk exposure. Reviews, analyzes, and evaluates risk assessments and risk management' effectiveness carried out by Line 1; and
3. Line 3: provides reasonable assurance through independent assessment, review, and validation (risk management framework, policies, and tools are quite strong and consistent with applicable regulations' standards, controls to mitigate sufficient and effective risks implemented by Line 1, adequate supervision by Line 2 against Line 1).

Evaluasi penerapan manajemen risiko ditinjau dan dikomunikasikan melalui rapat-rapat secara berkala seperti melalui rapat Komite Manajemen Risiko.

Evaluation of risk management implementation is reviewed and communicated through regular meetings such as through the Risk Management Committee's meetings.

Stress Test

Bank melakukan *stress test* secara berkala dan berkelanjutan untuk mengidentifikasi dan menyerap potensi risiko dari kemungkinan kejadian atau perubahan pada kondisi-kondisi ekonomi di masa depan seperti terjadinya resesi, pasar keuangan yang memburuk, atau peristiwa spesifik yang dapat menimbulkan kerugian ekonomis terhadap Bank. Tujuan utama dari *stress test* adalah untuk mengevaluasi kecukupan modal Bank untuk menyerap potensial kerugian besar yang dapat timbul dan untuk mengidentifikasi langkah-langkah yang perlu dilakukan untuk mengurangi risiko dan menjaga modal pada tingkat yang aman. Secara umum, skenario dalam pelaksanaan *stress test* mempertimbangkan perubahan pada beberapa variabel makroekonomi seperti suku bunga, tingkat inflasi, produk domestik bruto, nilai tukar, dan lainnya. Sedangkan, *stress test* secara spesifik menggunakan asumsi dari internal Bank, seperti penarikan dana besar-besaran atau penurunan kualitas kredit.

Stress Test

The Bank carries out stress tests periodically and continuously to identify and absorb potential risks from possible events or changes in future economic conditions, such as recession, worsening financial markets, or specific events that could cause economic loss to the Bank. The main purpose of stress test is to evaluate the adequacy of Bank capital to absorb potential large losses that can arise and to identify steps that need to be taken to reduce risk and maintain capital at a safe level. In general, the scenario in the implementation of the stress test considers changes in several macroeconomic variables such as interest rates, inflation rates, gross domestic product, exchange rates, and others. Meanwhile, stress test specifically uses assumptions from the Bank's internal, such as large-scale withdrawals or a decline in loan quality.

Struktur Organisasi *Risk Management*

Bank Victoria memiliki struktur organisasi *Risk Management* yang memadai untuk mendukung penerapan manajemen risiko. Struktur organisasi *Risk Management* Bank dijelaskan sebagai berikut:

1. Komite Pemantau Risiko bertujuan untuk membantu Dewan Komisaris melaksanakan tugas dalam pemantauan implementasi manajemen risiko dalam rangka mengevaluasi pelaksanaan kebijakan manajemen risiko di tingkat eksekutif;
2. Komite Manajemen Risiko merupakan komite eksekutif di bawah Direksi yang bertanggung jawab untuk memastikan efektivitas kerangka kerja manajemen risiko dan implementasi dalam mendukung strategi bisnis. Komite Manajemen Risiko juga bertanggung jawab untuk mengevaluasi dan merekomendasikan kebijakan manajemen risiko, strategi, *risk appetite*, toleransi risiko, limit risiko, kerangka kerja manajemen risiko, dan rencana kontingensi untuk mengantisipasi kondisi abnormal, serta memastikan eksposur risiko untuk semua jenis risiko di Bank tetap sesuai dengan *risk appetite*;
3. Komite Kredit merupakan suatu komite yang beranggotakan pemegang kewenangan kredit/pemegang kewenangan untuk melakukan pemutusan kredit termasuk restrukturisasi kredit yang mewakili fungsi *Business* Unit/*Special Asset Management* (SAM) Unit dan *Credit Risk Review* Unit, di mana kewenangan memutus kredit tersebut melekat pada individu yang memiliki kemampuan, kompetensi, dan integritas;
4. Komite Kebijakan Perkreditan merupakan komite yang membantu Direksi dalam merumuskan kebijakan perkreditan Bank agar pemberian kredit dilakukan dengan hati-hati, memantau dan mengevaluasi pelaksanaan kebijakan perkreditan Bank yang telah dibuat, memonitor perkembangan dan kondisi portofolio kredit, serta memberikan saran ataupun solusi sebagai langkah perbaikan ke depannya. Komite Kebijakan Perkreditan bertanggung

Risk Management Organizational Structure

Bank Victoria has an adequate Risk Management organizational structure to support the implementation of risk management. The Bank's Risk Management organizational structure is as follows:

1. Risk Monitoring Committee aims to assist the Board of Commissioners in performing its duties in monitoring the risk management implementation to evaluate the implementation of risk management's policies at executive level;
2. The Risk Management Committee is an executive committee under the Board of Directors that is responsible for ensuring the effectiveness of risk management framework and implementation in supporting business strategy. Risk Management Committee is also responsible for evaluating and recommending risk management policies, strategies, risk appetite, risk tolerance, risk limits, risk management framework, and contingency plans to anticipate abnormal conditions, as well as ensuring risk exposure for all types of risk in the Bank remains appropriate with risk appetite;
3. Credit Committee is a committee consisting of authority holders of credit/authority holders to terminate credit, including credit restructuring, that represents the function of Business Unit/Special Asset Management (SAM) Unit and Credit Risk Review Unit, in which the authority to terminate credit is attached to individual who has ability, competence, and integrity;
4. Credit Policy Committee is a committee that assists the Board of Directors in formulating the Bank's credit policy, so as credit provision is carried out carefully, monitoring and evaluating the implementation of the established Bank's credit policies, monitoring the development and condition of credit portfolio, and providing suggestions or solutions as improvement steps in the future. The Credit Policy Committee is responsible for supervising and approving

jawab untuk mengawasi dan menyetujui kebijakan, prosedur dan parameter risiko kredit, serta mengawasi pengelolaan dan pelaksanaan kebijakan risiko kredit; dan
5. *Risk Management/Integrated* merupakan satuan kerja independen terhadap satuan kerja operasional (*risk taking unit*) dan satuan kerja yang melaksanakan fungsi pengendalian internal yang bertanggung jawab kepada Direktur yang membawahi manajemen risiko.

credit risk policies, procedures, and parameters, as well as overseeing the management and implementation of credit risk policies; and
5. The Risk Management/Integrated is an independent work unit against the operational work unit (risk-taking unit) and a work unit that performs internal control function that is responsible to the Director in charge of risk management.

Uraian lengkap terkait Komite Pemantau Risiko, Komite Manajemen Risiko, Komite Kredit, dan Komite Kebijakan Perkreditan dapat dilihat pada bab Tata Kelola Perusahaan dalam Laporan Tahunan ini.

Complete description regarding the Risk Monitoring Committee, Risk Management Committee, Credit Committee, and Credit Policy Committee can be seen in the Corporate Governance chapter in this Annual Report.

Risk Management/Integrated

Risk Management/Integrated merupakan satuan kerja independen terhadap satuan kerja operasional dan satuan kerja yang melaksanakan fungsi pengendalian internal. *Risk Management/Integrated* dipimpin oleh seorang Kepala Divisi dan bertanggung jawab langsung kepada Direktur Kepatuhan dan Manajemen Risiko. *Risk Management/Integrated* bekerja sama dengan seluruh unit bisnis dan unit pendukung untuk membangun secara komprehensif dalam melakukan proses identifikasi, pengukuran, pemantauan, pengendalian risiko dan sistem informasi, *Risk Management/Integrated* menjadi mitra strategis dari unit-unit bisnis guna mengoptimalkan pendapatan dan meminimalisir potensi kerugian dari aktivitas fungsional operasional Bank.

Risk Management/Integrated

The Risk Management/Integrated is an independent work unit against operational work units and a work unit performing internal control functions. The Risk Management/Integrated is led by a Division Head who is directly responsible to the Director of Compliance and Risk Management. The Risk Management/Integrated partners with all business units and supporting units to build a comprehensive process of identification, measurement, monitoring, control of risk and information systems. The Risk Management/Integrated becomes a strategic partner of the business units to optimize revenue and minimize potential losses from the Bank's operational functional activities.

Pedoman *Risk Management/Integrated*

Dalam melaksanakan tugas dan tanggung jawabnya, *Risk Management/Integrated* mengacu kepada Kebijakan dan Pedoman Umum Manajemen Risiko Bank Victoria pada tanggal 30 September 2022 yang telah dikinikan menjadi mengenai pedoman Kebijakan dan Pedoman Umum Manajemen Risiko (Kebijakan Utama Kerangka Kerja Manajemen Risiko) pada tanggal 31 Januari 2024.

Risk Management/Integrated Guidelines

In performing its duties and responsibilities, the Risk Management/Integrated refers to Bank Victoria's General Risk Management Policy and Guidelines on 30 September 2022, updated to the General Risk Management Policy and Guidelines (Main Risk Management Framework Policy) on 31 January 2024.

Tugas dan Tanggung Jawab *Risk Management/Integrated*

Tugas dan tanggung jawab *Risk Management/Integrated* meliputi:
1. Memantau pelaksanaan strategi manajemen risiko yang telah disetujui oleh Direksi;
2. Mengawasi dan menguji aktivitas pengambilan risiko dan rencana remediasi risiko yang dibuat oleh Lini 1, termasuk penyelenggaraan produk baru bank serta membuat rekomendasi atau keputusan untuk menyetujui atau menolak aktivitas/produk sesuai kebutuhan;
3. Mengkaji ulang secara berkala terhadap proses manajemen risiko;
4. Memastikan dan memantau posisi risiko secara keseluruhan (*composite*), per jenis risiko, dan per jenis aktivitas fungsional sejalan dengan *risk appetite* dan *risk tolerance*, serta melakukan *stress testing;*

Duties and Responsibilities of Risk Management/Integrated

The duties and responsibilities of the Risk Management/Integrated include:
1. Monitoring the implementation of risk management strategy that has been approved by the Board of Directors;
2. Supervise and examine risk taking activities and risk remediation plans created by Line 1, including new bank products, and make recommendations or decisions to approve or reject activities/products as needed;
3. Periodically review the risk management process;
4. Ensure and monitor the overall risk position (composite), per type of risk, and per type of functional activity in line with risk appetite and risk tolerance, and perform stress testing;

5. Memberikan rekomendasi kepada satuan kerja operasional (*risk taking unit*) dan/atau kepada Komite Manajemen Risiko sesuai kewenangan yang dimiliki, antara lain memuat rekomendasi yang terkait dengan besaran atau maksimum eksposur risiko yang wajib dipelihara oleh Bank;
6. Menyusun dan menyampaikan laporan profil risiko kepada Direktur Utama atau Direktur yang ditugaskan secara khusus, juga kepada Komite Manajemen Risiko secara berkala; dan
7. Melakukan evaluasi terhadap keakuratan model dan validitas data yang digunakan dalam mengukur risiko untuk keperluan internal.

5. Providing recommendation to the operational work unit (risk taking unit) and/or to the Risk Management Committee, in accordance with its authority, among others, recommendations related to the amount or maximum risk exposure that must be maintained by the Bank;
6. Preparing and delivering the risk profile report to the President Director or Director specifically in charge of, and also the Risk Management Committee periodically; and
7. Evaluate the model accuracy and data validity used in measuring risk for internal purposes.

Profil Kepala Divisi *Risk Management/Integrated*

Profile of Head of Risk Management/Integrated Division

SAM R SOELAEMAN

Kepala Divisi *Risk Management/Integrated*
Head of Risk Management/Integrated Division

Kewarganegaraan
Nationality
Indonesia / Indonesian

Tempat Lahir
Place of Birth
Cianjur

Usia
Age
58 tahun / years old

Domisili
Domicile
Bogor

Dasar Pengangkatan dan Periode Menjabat
Keputusan Direksi No. 001/SK-DIR/HCM/08/23 tanggal 1 Agustus 2023.

Riwayat Pendidikan
Magister Manajemen dari Universitas Pancasila Jakarta (2003).

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan
Memiliki pengalaman kerja dalam industri perbankan sejak tahun 1990 dan memegang beberapa posisi penting di antaranya:
- *Forex Trader* PT ASEAM Indonesia (1990-1992);
- *Treasury* PT Bank Rama (1992-2001);
- Pemeriksa *Specialist Treasury* dan Manajemen Risiko Bank Indonesia (2001-2004); dan
- *Head of Market, Liquidity, & Treasury Credit Risk Management* PT Bank Maybank Indonesia Tbk (2005-2022).

Sertifikasi
- *International Certificate in Banking Risk and Regulation* (ICBRR) dari Global Association of Risk Professional - Badan Sertifikasi Manajemen Risiko (GARP-BSMR) (2009); dan
- Sertifikasi Manajemen Risiko Level 6 dari Lembaga Sertifikasi Profesi Perbankan (2023-2026).

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

Basis of Appointment and Term of Office
Board of Directors' Decision No. 001/SK-DIR/HCM/08/23 dated 1 August 2023.

Education
Master of Management from Universitas Pancasila Jakarta (2003).

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Positions
Has work experience in banking industry since 1990 and has held several important positions including:
- Forex Trader at PT ASEAM Indonesia (1990-1992);
- Treasury at PT Bank Rama (1992-2001);
- Treasury and Risk Management Specialist Examiner at Bank Indonesia (2001-2004); and
- Head of Market, Liquidity, & Treasury Credit Risk Management at PT Bank Maybank Indonesia Tbk (2005-2022).

Certification
- International Certificate in Banking Risk and Regulation (ICBRR) from the Global Association of Risk Professional - Risk Management Certification Agency (GARP-BSMR) (2009); and
- Risk Management Certification Level 6 from Banking Professional Certification Institute (2023-2026).

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

Laporan Singkat Pelaksanaan Kegiatan Tugas *Risk Management/Integrated* Tahun 2023

Di tahun 2023, *Risk Management/Integrated* telah melaksanakan beberapa kegiatan yang menjadi tugas dan tanggung jawabnya, yaitu:

1. Melakukan kaji ulang terhadap profil risiko, faktor rentabilitas, faktor permodalan, dan eksposur risiko yang melekat pada Satuan Kerja Operasional;

Brief Report on the Implementation of Risk Management/Integrated' Duties in 2023

In 2023, the Risk Management/Integrated carried out its duties and responsibilities, namely:

1. Reviewing the risk profile, earnings factor, capital factor, and risk exposure inherent in the Operational Unit;

2. Melakukan evaluasi dan menginikan kebijakan dan strategi manajemen risiko menjadi *Risk Management Framework* yang telah disetujui oleh Direksi melalui Komite Manajemen Risiko;
3. Memantau eksposur risiko dan kepatuhan terhadap toleransi risiko dan limit yang telah ditetapkan, di antaranya melalui laporan maupun Komite Manajemen Risiko, serta melakukan *stress testing*;
4. Melakukan kajian untuk usulan penyelenggaraan produk baru bank;
5. Menyusun dan menyampaikan laporan-laporan terkait manajemen risiko sesuai dengan peraturan yang berlaku, baik kepada pihak internal maupun regulator secara berkala; dan
6. Membuat beberapa kebijakan baru terkait dengan pengelolaan risiko pasar.

Pelatihan dan/atau Peningkatan *Risk Management/Integrated*

Selama tahun 2023, *Risk Management/Integrated* telah mengikuti pelatihan dan/atau peningkatan kompetensi sebagai berikut:

1. Sosialisasi Kebijakan *Risk Register* (oleh Bank Victoria);
2. *Expert Sharing Session* - Keuangan Berkelanjutan (oleh Otoritas Jasa Keuangan Institute);
3. *Induction Training Program* (oleh Bank Victoria); dan
4. *Team Building* dan *Outbond*: *Change the Future* (oleh Bank Victoria).

2. Evaluating and updating risk management policies and strategies into Risk Management Framework approved by the Board of Directors through the Risk Management Committee;
3. Monitoring risk exposure and compliance with the established risk tolerances and limits, including through reports and the Risk Management Committee, as well as conducting stress testing;
4. Reviewing proposed new products of the Bank;
5. Preparing and submitting reports related to risk management in accordance with the applicable regulations, both to internal parties and regulators, on a regular basis; and
6. Creating several new policies related to market risk management.

Risk Management/Integrated Training and/or Development Programs

Throughout 2023, the Risk Management/Integrated attended training and/or competency developments as follows:

1. Dissemination of Risk Register Policy (by Bank Victoria);
2. Expert Sharing Session - Sustainable Finance (by Otoritas Jasa Keuangan Institute);
3. Induction Training Program (by Bank Victoria); and
4. Team Building and Outbound: Change the Future (by Bank Victoria).

Sertifikasi Manajemen Risiko

Bank telah melibatkan jajaran manajemen dalam program sertifikasi manajemen risiko dan menyelenggarakan pelatihan penyegaran bagi yang telah lulus program sertifikasi manajemen risiko. Informasi terkait sertifikasi manajemen risiko di tahun 2023 sebagai berikut:

Risk Management Certification

The Bank involved the management in a risk management certification program, also conducted refreshment training for those who have passed the risk management certification program. The information related to risk management certification in 2023 is as follows:

Level	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	Pejabat Eksekutif Executive Officers	Lain-Lain Others	Total
I	-	-	1	177	178
II	1	-	2	63	66
III	-	-	14	31	45
IV	-	-	8	6	14
V	2	5	2	-	9
Total	**3**	**5**	**27**	**277**	312

Pengungkapan Eksposur Risiko
Disclosure of Risk Exposure

Bank menyadari bahwa risiko dapat memengaruhi kegiatan usaha, meningkatkan kebutuhan praktik GCG, termasuk fungsi identifikasi, pengukuran, pemantauan, dan pengendalian risiko. Pengelolaan risiko Bank dipengaruhi oleh faktor-faktor internal dan eksternal yang mencakup namun tidak terbatas pada operasional bisnis Bank dan ketentuan regulator.

The Bank recognizes that risks can affect business activities and increase the needs for GCG practices, including risk identification, measurement, monitoring, and control functions. Bank risk management is influenced by internal and external factors which include but are not limited to the Bank's business operations and regulatory provisions.

Risiko Kredit

Risiko kredit merupakan risiko kegagalan pihak lain dalam memenuhi kewajiban kepada Bank, termasuk risiko kredit akibat kegagalan debitur, risiko konsentrasi kredit, *counterparty credit risk, settlement risk,* dan *country risk*.

Tujuan dari manajemen risiko kredit adalah untuk memastikan aktivitas penyediaan dana Bank tidak terekspos pada risiko kredit yang dapat menimbulkan kerugian pada Bank.

Pengungkapan Eksposur Manajemen Risiko Kredit

1. Risiko Kredit secara Umum (CRA)

a. Model Bisnis tercermin dalam Komponen Profil Risiko Kredit Bank

Penerapan manajemen risiko Bank untuk risiko kredit secara prinsip mengacu pada peraturan regulator dan ketentuan yang berlaku serta *market practices* yang disesuaikan dengan tujuan, kebijakan, ukuran, dan kompleksitas bisnis Bank untuk mencapai pertumbuhan bisnis yang sehat dan berkelanjutan serta menjaga agar dapat menghasilkan *return* yang optimal sesuai dengan *risk appetite* dan *risk tolerance* yang telah ditetapkan.

Dalam menjalankan strategi Bank sejalan dengan visi dan misi sebagai acuan dalam mengambil keputusan serta menjalankan kegiatan operasional Bank, strategi manajemen risiko kredit yang dilakukan oleh Bank untuk menjaga risiko kredit, di antaranya sebagai berikut:

1) Bank menjaga tingkat risiko kredit dengan mitigasi yang memadai untuk mencapai tujuan strategis; dan
2) Pertumbuhan/peningkatan portofolio kredit dengan memperhatikan kecukupan modal dalam kondisi normal dan skenario *stress*.

Strategi manajemen risiko disusun untuk memastikan bahwa eksposur risiko dikelola secara terkendali sesuai dengan kebijakan kredit, prosedur internal, peraturan dan perundang-undangan, serta ketentuan lain yang berlaku.

Credit Risk

Credit risk is the risk of failure of other parties in fulfilling obligations to the Bank, including credit risk due to debtor failure, credit concentration risk, counterparty credit risk, settlement risk, and country risk.

The credit risk management is aimed to ensure that the Bank's fund provision activities are not exposed to credit risk which could cause losses to the Bank.

Disclosure of Credit Risk Management Exposure

1. General Credit Risk (CRA)

a. Business Model is reflected in the Bank's Credit Risk Profile Component

The Bank's risk management implementation for credit risk in principle refers to the applicable regulatory regulations and provisions, as well as market practices adapted to the objectives, policies, size, and complexity of the Bank's business, in order to achieve healthy and sustainable business growth and ensure that it can produce optimal returns in accordance with the established risk appetite and risk tolerance.

In carrying out the Bank's strategy in line with vision and mission as a reference in making decisions and carrying out the Bank's operational activities, the credit risk management strategy carried out by the Bank to maintain credit risk, includes the following:

1) The Bank maintains credit risk levels with adequate mitigation to achieve strategic objectives; and
2) Growth/increase in credit portfolio with due observance of the capital adequacy in normal conditions and stress scenarios.

Risk management strategy is prepared to ensure that risk exposure is managed in a controlled manner in accordance with credit policies, internal procedures, rules and regulations, and other applicable provisions.

b. Kebijakan Manajemen Risiko untuk Risiko Kredit dan Limit Risiko Kredit

Kebijakan manajemen risiko untuk risiko kredit merupakan arahan tertulis dalam menerapkan manajemen risiko untuk risiko kredit dengan memperhatikan karakteristik dan kompleksitas kegiatan usaha, tingkat risiko yang akan diambil dan toleransi risiko, profil risiko serta peraturan yang ditetapkan otoritas dan/atau praktik perbankan yang sehat, seperti di antaranya pengendalian risiko konsentrasi kredit dan/atau dengan melakukan diversifikasi portofolio kredit dan penyebaran risiko yang timbul dari berbagai sektor industri atau sektor ekonomi. Terkait hal ini, Bank di antaranya melakukan:

1) Penetapan limit berdasarkan sektor ekonomi atas analisa makro ekonomi dan karakteristik Bank;

2) Analisa risiko konsentrasi kredit dilakukan sesuai portofolio yang dikelola Bank dengan mempertimbangkan berbagai dampak perubahan dari indikator ekonomi yang dapat memengaruhi pemberian kredit pada sektor ekonomi tertentu; dan
3) Analisa pergerakan kualitas kredit seperti *non-performing loan.*

Penetapan limit dilakukan secara komprehensif atas seluruh aspek yang terkait dengan risiko, yang mencakup limit per aktivitas bisnis Bank. Limit digunakan sebagai ambang batas untuk menentukan tingkat intensitas mitigasi risiko yang akan dilaksanakan manajemen.

c. Struktur Organisasi Manajemen Risiko Kredit

Penerapan manajemen risiko kredit di Bank Victoria dilakukan melalui desain struktur organisasi yang menggambarkan keterlibatan seluruh pihak yang terkait manajemen risiko kredit sebagai berikut:

1) Dewan Komisaris berperan dalam menyetujui rencana kredit tahunan Bank dan mengawasi pelaksanaannya, menyetujui kebijakan perkreditan Bank, meminta penjelasan dan tanggung jawab kepada Direksi jika dalam pelaksanaan pemberian kredit terdapat penyimpangan dari kebijakan yang telah ditetapkan;
2) Direksi berperan dalam menyusun rencana dan kebijakan perkreditan, memastikan kepatuhan Bank terhadap ketentuan perundang-undangan dan peraturan yang berlaku di bidang perkreditan dan kebijakan perkreditan, serta melaporkan kepada Dewan Komisaris mengenai pelaksanaan rencana perkreditan, penyimpangan dalam pelaksanaan pemberian kredit, perkembangan kualitas portofolio kredit dan kredit dalam pengawasan khusus atau bermasalah;
3) Lini Pertahanan Pertama, terdiri dari Divisi Bisnis, Divisi *Credit Risk Review,* Divisi *Loan & Trade Operations,* dan Divisi *Special Asset Management.* Lini Pertahanan Kedua terdiri dari Divisi *Credit Monitoring* dan *Collection* dan Divisi *Corporate Legal;*

b. Risk Management Policy for Credit Risk and Credit Risk Limit

Risk management policy for credit risk is written direction in implementing risk management for credit risk by considering business activities' characteristics and complexity, level of risk to be taken and risk tolerance, risk profile and regulations set by authorities and/or sound banking practices, as in including controlling credit concentration risk and/or by diversifying credit portfolio and spreading risks arising from various industrial sectors or economic sector. Regarding this matter, the Bank conducts:

1) Establishment of limit based on the economic sector of the macroeconomic analysis and the Bank's characteristics;
2) Credit concentration risk analysis is conducted according to the portfolio managed by the Bank by considering various impacts of changes in economic indicators that can affect lending on certain economic sector; and
3) Analysis of credit quality movements, such as non-performing loans.

Limit is established comprehensively for all aspects related to risk, which includes limits per Bank business activity. Limits are used as thresholds to determine the level of risk mitigation intensity to be implemented by the management.

c. Organizational Structure of Credit Risk Management

The implementation of credit risk management at Bank Victoria is carried out through the design of an organizational structure that describes the involvement of all parties related to credit risk management as follows:

1) The Board of Commissioners plays a role in approving the Bank's annual credit plan and supervising its implementation, approving the Bank's credit policy, asking for explanation and accountability from the Board of Directors if there is a deviation from the stipulated policy in the provision of credit;
2) The Board of Directors plays a role in preparing credit plans and policies, ensuring the Bank's compliance with the laws and regulations applicable in credit sector and credit policies, and reporting to the Board of Commissioners on credit plan implementation, irregularities in the implementation of credit extension, development of credit and credit portfolio quality under special mention or nonperforming;

3) The First Line of Defense, consists of the Business Division, Credit Risk Review Division, Loan & Trade Operations Division, and Special Asset Management Division. The Second Line of Defense consists of the Credit Monitoring and Collection Division and Corporate Legal Division;

4) *Credit Legal Unit;* Divisi *Compliance and System Procedure;* dan Divisi *Risk Management/Integrated*; dan
5) Lini Pertahanan Ketiga adalah Divisi SKAI & *Anti Fraud.*

Selain itu, Bank juga dibantu oleh komite-komite eksekutif seperti:
1) Komite Kredit;
2) Komite Kebijakan Perkreditan; dan
3) Komite Manajemen Risiko.

d. Hubungan antara Fungsi Manajemen Risiko untuk Risiko Kredit, Pengendalian Risiko, Kepatuhan, dan Audit Internal
Penerapan manajemen risiko bermanfaat untuk melakukan analisis kemungkinan adanya risiko yang akan dihadapi saat ini maupun yang akan datang dengan tujuan agar Bank mampu mengidentifikasi setiap risiko yang berpotensi muncul dan berdampak signifikan.

Secara internal, efektivitas penerapan manajemen risiko kredit juga didukung oleh unit independen lainnya seperti *Compliance* dan SKAI & *Anti Fraud*. Dalam hal ini, *Compliance* melakukan fungsinya untuk memastikan kebijakan dan penerapan manajemen risiko telah sesuai ketentuan yang berlaku. Sementara itu, SKAI & *Anti Fraud* secara rutin melakukan peninjauan ulang dan audit terhadap penerapan manajemen risiko Bank berdasarkan *risk-based audit* dengan tujuan sebagai pengendalian internal serta perbaikan penerapan manajemen risiko secara terus menerus. Adapun evaluasi efektivitas sistem manajemen risiko secara eksternal dilakukan oleh auditor eksternal maupun regulator. Evaluasi penerapan manajemen risiko ditinjau dan dikomunikasikan melalui rapat-rapat secara berkala, seperti melalui rapat Komite Manajemen Risiko.

e. Cakupan dan Informasi Utama dari Pelaporan Eksposur Risiko Kredit dan Fungsi Manajemen Risiko untuk Risiko Kredit kepada Direksi dan Dewan Komisaris
Pengungkapan eksposur risiko kredit dengan pendekatan standar risiko kredit berpedoman pada Peraturan Otoritas Jasa Keuangan No. 27 Tahun 2022 tentang Perubahan Kedua atas Peratuan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum bagi Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 48/SEOJK.03/2017 tentang Pedoman Perhitungan Tagihan Bersih Transaksi Derivatif dalam Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar, dan Surat Edaran Otoritas Jasa Keuangan No. 24/SEOJK.03/2021 Pedoman Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar bagi Bank Umum.

4) Credit Legal Unit; Compliance Division, and System Procedure; and Risk Management/Integrated Division; and
5) The Third Line of Defense is the SKAI & Anti-Fraud Division.

Furthermore, the Bank is also assisted by executive committees such as:
1) Credit Committee;
2) Credit Policy Committee; and
3) Risk Management Committee.

d. Relationship between Risk Management Function for Credit Risk, Risk Control, Compliance, and Internal Audit
Risk management is useful to analyze the possible risks that may be faced in the present or future, with the aim of enabling the Bank to identify any potential risks that may arise and have a significant impact.

Internally, the effectiveness of credit risk management implementation is also supported by other independent units, such as the Compliance and SKAI & Anti-Fraud. In this matter, the Compliance performs its function to ensure that risk management policies and implementation are in accordance with the applicable regulations. Whereas, the SKAI regularly reviews and audits the Bank's risk management implementation on a risk-based audit principle with the objective as internal control and continuous improvement of risk management implementation. The risk management system effectiveness is externally evaluated by external auditors and regulators. Evaluation of risk management implementation is reviewed and communicated through regular meetings, such as through the Risk Management Committee's meetings.

e. Scope and Key Information from the Reporting of Credit Risk Exposure and Risk Management Function for Credit Risk to the Board of Directors and Board of Commissioners
Disclosure of credit risk exposure with a standardized approach of credit risk refers to the Financial Services Authority Regulation No. 27 of 2022 on Second Amendment to Financial Services Authority Regulation No. 11/POJK.03/2016 on Capital Adequacy Ratio for Commercial Banks and Financial Services Authority Circular No. 48/SEOJK.03/2017 on Guidelines for Calculating Net Receivables for Derivative Transactions in Calculating Risk-Weighted Assets for Credit Risk by Using a Standardized Approach, and Financial Services Authority Circular No. 24/SEOJK.03/2021 on Guidelines for Calculating Risk-Weighted Assets for Credit Risk by Using Standardized Approach for Commercial Banks.

Terkait pengungkapan, Bank senantiasa menerapkan kebijakan dan mengedepankan prinsip kehati-hatian dalam mitigasi risiko kredit. Dalam hal ini, Bank telah memuat informasi berikut dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko untuk CRA:

1) Tabel Pengungkapan Kualitas Kredit atas Aset (CR1);
2) Tabel Pengungkapan Mutasi Kredit dan Surat Berharga yang telah Jatuh Tempo (CR2);
3) Tabel Pengungkapan Kuantitatif terkait Teknik MRK (CR3);
4) Tabel Pengungkapan Eksposur Risiko Kredit dan Dampak Teknik MRK (CR4); dan
5) Tabel Pengungkapan Eksposur berdasarkan Kelas Aset dan Bobot Risiko (CR5).

2. Pengungkapan Tambahan terkait Kualitas Kredit atas Aset (CRB)

a. Tagihan yang Jatuh Tempo dan Tagihan yang Mengalami Penurunan Nilai/*Impairment*

Bank menerapkan kebijakan tentang tagihan yang jatuh tempo dan tagihan yang mengalami penurunan nilai atau *impairment*, yang meliputi:

1) Tagihan yang telah jatuh tempo, merupakan tagihan yang telah jatuh tempo lebih dari 90 hari, baik atas pembayaran pokok dan/atau pembayaran bunga; dan
2) Tagihan yang mengalami penurunan nilai, yaitu suatu kondisi, di mana terdapat bukti objektif terjadinya peristiwa yang merugikan sebagai akibat dari satu atau lebih peristiwa yang terjadi setelah pengakuan awal kredit tersebut, dan peristiwa yang merugikan tersebut berdampak pada estimasi arus kas masa datang atas aset keuangan atau kelompok aset keuangan yang dapat diestimasi secara andal.

b. Pendekatan yang Digunakan dalam Pembentukan Cadangan Kerugian Penurunan Nilai

Dalam mengestimasi Cadangan Kerugian Penurunan Nilai (CKPN) atas aset keuangan, Bank telah menerapkan Pernyataan Standar Akuntansi Keuangan (PSAK) 71 tentang "Instrumen Keuangan" sejak tanggal 1 Januari 2020. Dalam PSAK 71 ini memperkenalkan metode kerugian kredit ekspektasian dalam mengukur kerugian instrumen keuangan akibat penurunan nilai instrumen keuangan yang merupakan konvergensi *International Financial Accounting Standard* 9 – *Financial Instrument* di Indonesia, di mana dalam PSAK 71 menggunakan prinsip *Forward-Looking Expected Credit Loss* (ECL).

Permodelan parameter yang digunakan Bank seperti *probability of default, loss given default*, dan *exposure at default* komponen perhitungan kerugian kredit ekspektasian.

Dalam menghitung kerugian kredit ekspektasian, Bank memperhitungkan pengaruh dari beberapa *macroeconomic forecast* dalam permodelan *impairment* di PSAK 71.

Regarding disclosure, the Bank always implements policies and prioritizes the prudential principles in mitigating credit risk. Regarding this matter, the Bank has included the following information in the Appendix on Quantitative Disclosure of Risk Exposure for CRA:

1) Table of Disclosure of Credit Quality over Asset (CR1);
2) Table of Disclosure of Changes in Matured Loans and Securities (CR2);
3) Table of Disclosure of Quantitative related to MRK Techniques (CR3);
4) Table of Disclosure of Credit Risk Exposure and Impact of MRK Techniques (CR4); and
5) Table of Disclosure of Exposure by Asset Class and Risk Weight (CR5).

2. Additional Disclosures regarding Credit Quality over Asset (CRB)

a. Matured Receivables and Impaired Receivables

The Bank implements policies regarding due receivables and impaired receivables, which include:

1) Matured receivable is a bill that has been overdue more than 90 days, either on the payments of principal and/or interest; and
2) Impaired receivable is a condition in which there is objective evidence of an adverse event occurring as a result of one or more events occurring after the initial recognition of such credit, and such adverse event has an impact on the estimated future cash flow of a financial asset or group of financial assets that can be estimated reliably.

b. Approach Used in the Formation of Allowance for Impairment Losses

In estimating Allowance for Impairment Losses (CPKN) on financial assets, the Bank has implemented Statement of Financial Accounting Standard (PSAK) 71 on "Financial Instrument" since 1 January 2020. PSAK 71 introduces a method for the expected credit losses in measuring financial instrument losses due to impairment of financial instruments, which is the convergence of International Financial Accounting Standard 9 - Financial Instruments in Indonesia, and in PSAK 71, the principle of Forward-Looking Expected Credit Loss (ECL) is used.

The modeling parameters used by the Bank, such as probability of default, loss given default, and exposure at default, are components for calculating expected credit losses.

In calculating the expected credit losses, the Bank calculates the effects of several macroeconomic forecasts in the impairment modeling in PSAK 71.

CKPN dalam PSAK 71 memiliki 3 (tiga) *stages* berdasarkan tingkat risiko dari rendah hingga tinggi yang diklasifikasi sebagai berikut:

1) *Stage 1* (*Performing*)
   Tidak ada peningkatan risiko kredit dan aset keuangan. Contohnya, pinjaman yang tidak pernah terlambat dalam pembayaran. *Expected Credit Loss* (ECL) diperkirakan dalam waktu 12 bulan.
2) *Stage* 2 (*Under-Performing*)
   Risiko kredit dan aset keuangan meningkat signifikan. Contohnya, pinjaman yang telah terlambat dalam pembayaran lebih dari 30 hari, tapi belum masuk dalam kriteria *stage* 3. *Expected Credit Loss* (ECL) diperkirakan hingga waktu jatuh tempo akhir (*lifetime*).
3) *Stage* 3 (*Non-Performing*)
   Kredit dan aset keuangan yang mengalami penurunan nilai dengan tajam disertai riwayat keterlambatan pembayaran. *Expected Credit Loss* (ECL) diakui hingga waktu jatuh tempo akhir (*lifetime).*

Dalam hal ini, Bank telah memuat informasi berikut dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko untuk CRB:

1) Tabel Pengungkapan Tagihan Bersih berdasarkan Wilayah Bank secara Individual;
2) Tabel Pengungkapan Tagihan Bersih berdasarkan Sektor Ekonomi Bank secara Individual;
3) Tabel Pengungkapan Tagihan Bersih berdasarkan Sisa Jangka Waktu Kontrak secara Individual;
4) Tabel Pengungkapan Tagihan dan Pencadangan berdasarkan Wilayah Bank secara Individual;
5) Tabel Pengungkapan Tagihan dan Pencadangan berdasarkan Sektor Ekonomi Bank secara Individual; dan
6) Tabel Pengungkapan Tagihan berdasarkan Hari Tunggakan.

3. Pengungkapan Tambahan terkait Perlakuan terhadap Aset Bermasalah (CRB-A)

a. Aset *Non-Performing*

Aset *non-performing* merupakan aset dengan kualitas kurang lancar, diragukan, dan macet yang umumnya terjadi pada kegiatan perkreditan. Penyelesaian aset bermasalah bagi debitur dilakukan sesuai dengan pola pengelolaan dan penyelesaian sesuai ketentuan yang berlaku. Aset yang telah dikategorikan bermasalah ditangani melalui pembinaan, penyelamatan, serta penyelesaian secara sukarela. Pelaporan aset bermasalah dilakukan oleh divisi *Special Asset Management.*

Dalam usahanya, Bank melakukan penanganan aset bermasalah secara persuasif serta menghindari risiko reputasi Bank, maka sebelum melakukan tindakan-tindakan lebih lanjut dilakukan pemanggilan atas debitur terlebih dahulu dengan menggunakan surat peringatan maksimal 3 (tiga) kali.

CKPN in PSAK 71 has 3 (three) stages based on level of risk from low to high which are classified as follows:

1) Stage 1 (Performing)
   There is no increase in credit risk and financial assets. For example, a loan that is never late in payment. Expected Credit Loss (ECL) is estimated within 12 months;
2) Stage 2 (Under-Performing)
   Credit risk and financial assets have increased significantly. For example, a loan that is overdue by more than 30 days, but has not met the Stage 3 criteria. Expected Credit Loss (ECL) is estimated up to the final maturity time (lifetime).
3) Stage 3 (Non-Performing)
   Loans and financial assets that have experienced a sharp impairment accompanied by a history of late payments. Expected Credit Loss (ECL) is recognized up to the final maturity time (lifetime).

Regarding this matter, the Bank has included the following information in the Appendix on Quantitative Disclosure of Risk Exposure for CRB:

1) Table of Disclosure of Net Receivables by Area of the Bank, Individually;
2) Table of Disclosure of Net Receivables by Remaining Contract Period of the Bank, Individually;
3) Table of Disclosure of Net Receivables by Economic Sector of the Bank, Individually;
4) Table of Disclosure of Receivables and Allowances by Area of the Bank, Individually;
5) Table of Disclosure of Receivables and Allowances by Economic Sector of the Bank, Individually; and
6) Table of Disclosure of Receivables by Days Past Due.

3. Additional Disclosures regarding Treatment of Non-Performing Assets (CRB-A)

a. Non-Performing Assets

Non-performing assets are assets of substandard, doubtful, and loss, which generally occur in credit activities. Settlement of non-performing assets for debtors is carried out in accordance with management and settlement patterns with due observance of the applicable regulations. Assets categorized as non-performing are handled through couching, rescue, and voluntary settlement. Reporting of non-performing assets is carried out by the Special Asset Management division.

In its business, the Bank handles non-performing assets persuasively and avoids risks to the Bank's reputation, thus, the debtor is first summoned by using a maximum of 3 (three) warning letters prior to taking further actions.

Kategori kredit korporasi pada Bank terbagi atas beberapa segmen, di antaranya sebagai berikut:

1) *Large commercial*, kredit dengan tujuan usaha (produktif) dengan total plafon di atas Rp150.000 juta;
2) *Commercial,* kredit dengan tujuan usaha (produktif) dengan total plafon di atas Rp50.000 juta-Rp150.000 juta;
3) *Small, Medium, Enterprise* (SME), kredit dengan tujuan usaha (produktif) dengan total plafon sampai dengan Rp50.000 juta;
4) *Business Linkage*, kredit yang ditujukan pada perusahaan *multifinance* otomotif, baik *executing, channeling*, dan *joint financing,* serta perusahaan *multifinance non-otomotif,* seperti BPR dan koperasi.

Kategori kredit ritel pada Bank, di antaranya adalah segmen *consumer* yang diberikan kepada perorangan dan diajukan secara kelompok.

b. Aset yang Direstrukturisasi

Aset yang direstrukturisasi umumnya dilakukan pada kegiatan perkreditan merupakan upaya yang dilakukan Bank dalam kegiatan perkreditan terhadap debitur yang mengalami kesulitan untuk memenuhi kewajibannya. Restrukturisasi kredit dapat dilakukan Bank terhadap debitur yang masih mempunyai prospek usaha yang baik tetapi mengalami kesulitan pembayaran pokok dan/atau bunga. Kegiatan restrukturisasi dapat berupa:

1) Penjadwalan kembali (*rescheduling*), terkait perubahan jadwal pembayaran dan/atau jangka waktu;
2) Persyaratan kembali (*reconditioning*), terkait perubahan sebagian atau seluruh syarat kredit yang tidak terbatas pada jadwal pembayaran, jangka waktu, dan/atau persyaratan lainnya sepanjang tidak menyangkut perubahan maskimum saldo kredit; dan
3) Penataan kembali (*restructuring*), terkait perubahan syarat kredit yang menyangkut penambahan dana, konversi tunggak bunga menjadi pokok kredit baru, dan konversi kredit menjadi penyertaan dalam perusahaan dengan bentuk reorganisasi, *venture capital, management participation,* dan *management consultation.*

Dalam hal ini, Bank telah memuat informasi berikut dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko untuk CRB-A:
Tabel Pengungkapan Tambahan terkait Perlakuan terhadap Aset Bermasalah (CRB-A).

4. Pengungkapan terkait Teknik MRK (CRC)

a. Kebijakan dan Proses terkait Evaluasi dan Manajemen Agunan

Bank didukung oleh analisa kelayakan debitur dalam pemberian fasilitas kredit. Hal tersebut bertujuan untuk menilai kemampuan debitur dalam mengembalikan seluruh kewajibannya. Sebagai jaminan kredit, Bank

The corporate credit category at the Bank is divided into several segments, including the following:

1) Large commercial, credit for business (productive) purposes with a total credit above Rp150,000 million;
2) Commercial, credit for business (productive) purposes with a total credit above Rp50,000-Rp150,000 million;
3) Small, Medium, Enterprise (SME), credit for business purposes (productive) with a total credit of up to Rp50,000 million;
4) Business Linkage, credit aimed at automotive multi-finance companies, including executing, channeling, and joint financing, as well as non-automotive multi-finance companies, such as BPRs and cooperatives.

Retail credit categories at the Bank include consumer segment given to individuals and submitted as a group.

b. Restructured Assets

Restructuring assets are generally carried out in credit activities, which is the Bank's effort in credit activities for debtors with difficulty on fulfilling their obligations. The Bank can carry out credit restructuring for debtors with good business prospects but are experiencing difficulties in paying principal and/or interest. Restructuring activities can be in the form of:

1) Rescheduling, related to changes in payment schedule and/or time period;
2) Reconditioning, related to changes in part or all of the credit terms not limited to payment schedules, time periods, and/or other terms as long as they do not involve changes to the maximum credit balance; and
3) Restructuring, related to changes in credit terms involving additional funds, conversion of interest arrears into new credit principal, and conversion of credit into investment in the Company in form of reorganization, venture capital, management participation, and management consultation.

Regarding this matter, the Bank has included the following information in the Appendix on Quantitative Disclosure of Risk Exposure for CRB-A:
Table of Additional Disclosures regarding Treatment of Non-Performing Assets (CRB-A).

4. Disclosures related to MRK Techniques (CRC)

a. Policies and Processes related to Collateral Evaluation and Management

The Bank is supported by debtor feasibility analysis in granting credit facilities. This matter is aimed at assessing the debtor's ability in returning all of its obligations. As credit collateral, the Bank accepts collateral that meets

menerima agunan yang memenuhi kriteria, seperti mempunyai nilai ekonomis, *marketable*, *transferable*, serta mempunyai nilai yuridis. Dalam praktiknya, diperlukan agunan sebagai *second way out*, dalam hal debitur tidak mampu mengembalikan kewajibannya.

Pengelolaan agunan merupakan perangkat pengendalian risiko yang diterapkan oleh Bank guna melakukan mitigasi risiko kredit untuk meminimalisir dampak dari risiko yang terjadi.

b. Konsentrasi Risiko Kredit atas Instrumen yang digunakan sebagai Teknik MRK
Pihak-pihak utama pemberi jaminan/garansi dan kelayakan kredit (*credit worthiness*) merupakan kemampuan perusahaan untuk memenuhi kewajibannya terhadap Bank. Fokus utamanya terletak pada risiko, meliputi analisis likuiditas maupun solvabilitas. Alat analisis kredit dan kriterianya untuk penilaian seperti di antaranya jenis kredit dan tujuan kontrak utangnya.

Tingkat konsentrasi yang ditimbulkan dari penggunaan teknik mitigasi risiko kredit konsentrasi pada sektor atau portofolio kredit Bank dilakukan dengan pengelolaan risiko konsentrasi kredit melalui penentuan limit untuk sektor industri atau portofolio kredit pada suatu tingkat risiko/*risk appetite* dan *risk tolerance* yang dapat diterima. Hal tersebut bertujuan untuk mendukung pertumbuhan kredit yang sehat dengan mengedepankan pada prinsip-prinsip kehati-hatian.

5. Pengungkapan Penggunaan Peringkat Kredit Eksternal (CRD)

a. Lembaga Pemeringkat yang digunakan Bank
Bank menggunakan peringkat yang diterbitkan oleh lembaga pemeringkat yang diakui sesuai dengan Peraturan Otoritas Jasa Keuangan seperti diatur dalam Surat Edaran Otoritas Jasa Keuangan No. 37/SEOJK.03/2016 tentang Lembaga Pemeringkat dan Peringkat yang diakui Otoritas Jasa Keuangan, antara lain Moody's, Standard & Poor's, Fitch, Pefindo, Moody's Indonesia, dan Fitch Indonesia.

b. Kategori Portofolio yang Menggunakan Peringkat
Bank mengklasifikasikan tagihan berdasarkan kategori portofolio seperti tagihan kepada entitas sektor publik, tagihan kepada Bank, tagihan pada perusahaan efek dan lembaga jasa keuangan lainnya, serta tagihan kepada korporasi. Tagihan pada masing-masing portofolio dikelompokkan berdasarkan peringkat dari lembaga pemeringkat yang diakui regulator. Kelompok peringkat memiliki tingkat risiko yang berbeda.

the criteria, such as having economic value, marketable, transferable, and having juridical value. In practice, collateral is needed as a second way out, in the event that the debtor is unable to repay his obligations.

Collateral management is a risk control tool implemented by the Bank to mitigate credit risk in order to minimize the impact of the arising risks.

b. Concentration of Credit Risk on Instruments used as MRK Techniques
The main parties are the provider of collateral/guarantee and credit worthiness, which is the ability of the Company to fulfill its credit obligations to the Bank. The main focus lies in risk, including liquidity and solvency analysis. The credit analysis tool and its criteria for assessment of among others type and purpose of the debt contract.

The concentration level arising from the use of credit risk mitigation techniques concentration on sector or loan portfolio of the Bank is carried out by managing credit concentration risk through setting limit for industrial sector or loan portfolio of an acceptable level of risk/risk appetite and risk tolerance. This matter aims to support sound credit growth by prioritizing prudential principles.

5. Disclosure of Use of External Credit Ratings (CRD)

a. Rating Agency used by the Bank
The Bank uses ratings issued by rating agencies that are recognized in accordance with Financial Services Authority Regulations as stipulated in the Financial Services Authority Circular No. 37/SEOJK.03/2016 on Rating Agencies and Ratings recognized by the Financial Services Authority, including Moody's, Standard & Poor's, Fitch, Pefindo, Moody's Indonesia, and Fitch Indonesia.

b. Portfolio Categories by Using Ratings
The Bank classifies receivables by portfolio categories such as receivables from public sector entities, receivables from Banks, receivables from securities companies and other financial services institutions, as well as receivables from corporations. Receivables in each portfolio are grouped by ratings from rating agencies recognized by the regulator. Rating groups have different levels of risk.

Pengungkapan *Counterparty Credit Risk*

Bank menerapkan risiko kredit pihak lawan (*Counterparty Credit Risk*). *Counterparty Credit Risk* dapat ditimbulkan dari jenis transaksi derivatif *over the counter* (OTC) dan *repo/reverse repo*, baik pada posisi *banking book* maupun *trading book*. Dalam hal memitigasi *repo/reverse repo* dilakukan dengan penetapan limit *counterparty*, apabila terdapat pelampauan limit, maka perlu mendapatkan persetujuan Direksi melalui Divisi *International Banking*.

Pada posisi 31 Desember 2023, Bank tidak memiliki eksposur transaksi derivatif *Counterparty Credit Risk (*CCR1) dan tagihan bersih derivatif kredit (CCR6). Namun terkait pengungkapan, Bank Victoria memiliki eksposur risiko transaksi *reverse repo* yang diungkapkan pada tabel pengungkapan eksposur CCR berdasarkan Kategori Portofolio dan Bobot Risiko (CCR3).

Pengungkapan Eksposur Sekuritisasi (SECA)

Sebagai upaya diversifikasi risiko dan memaksimalkan hasil, Bank Victoria menempatkan sejumlah portofolio dalam bentuk sekuritisasi atau Kontrak Investasi Kolektif Efek Beragun Aset (KIK-EBA). Bank Victoria bertindak sebagai investor dan melakukan investasi pada EBA karena sekuritisasi ini mempunyai likuiditas baik.

Terkait pengungkapan, Bank Victoria memuat informasi Eksposur Sekuritisasi (SECA) pada *Banking Book* (SEC1) dan terkait Persyaratan Modalnya – Bank yang Bertindak sebagai Investor (SEC4), dan tidak memiliki eksposur pada *Trading Book* (SEC2), dan terkait Persyaratan Modalnya – Bank yang Bertindak sebagai Originator atau Sponsor (SEC3).

Risiko Pasar

Risiko pasar adalah risiko pada posisi neraca dan rekening administratif, termasuk transaksi derivatif, akibat perubahan secara keseluruhan dari kondisi pasar, termasuk risiko perubahan harga *option*.

Manajemen risiko pasar tidak hanya terbatas pada pengelolaan risiko, namun juga pengawasan atas seluruh risiko yang dihadapi Bank akibat dari pergerakan faktor pasar (di antaranya suku bunga dan nilai tukar) yang dapat berasal dari *banking book* maupun *trading book*. Tujuan utama manajemen risiko untuk risiko pasar adalah untuk meminimalkan kemungkinan dampak negatif akibat perubahan kondisi pasar terhadap aset dan permodalan Bank.

Struktur Organisasi Manajemen Risiko Pasar

Struktur organisasi manajemen risiko pasar disesuaikan dengan karakteristik dan kompleksitas kegiatan usaha Bank. Adapun struktur organisasi manajemen risiko pasar diuraikan sebagai berikut:

1. Lini Pertahanan Pertama, merupakan unit bisnis khususnya Divisi *Treasury*;
2. Lini Pertahanan Kedua, unit yang bertanggung jawab adalah Divisi *Risk Management/Integrated*; dan
3. Lini Pertahanan Ketiga, merupakan Divisi SKAI & *Anti Fraud*.

Disclosure of Counterparty Credit Risk

The Bank implements Counterparty Credit Risk. Counterparty Credit Risk is a risk arising from over the counter (OTC) derivative transaction and repo/reverse repo transactions, both in the banking book and trading book positions. In terms of repo/reverse repo mitigation with limit establishment for counterparty, approval from the Board of Directors through International Banking Division is required in the event that there is limit exceedance.

At 31 December 2023 position, the Bank has no exposure to Counterparty Credit Risk (CCR1) and net receivables of credit derivative (CCR6). However, regarding disclosure, Bank Victoria has a reverse repo transaction risk exposure which is disclosed in the CCR exposure disclosure table based on Portfolio Category and Risk Weight (CCR3).

Disclosure of Securitization Exposure (SECA)

In an effort to diversify risks and maximize returns, Bank Victoria places a number of portfolios in the form of securitization or Collective Investment Contract of Asset-Backed Securities (KIK EBA). Bank Victoria acts as an investor and invests in EBA due its good liquidity.

Regarding disclosure, Bank Victoria contains information on Securitization Exposure (SECA) in the Banking Book (SEC1) and related to its Capital Requirements – Bank Acting as Investor (SEC4), and has no exposure in the Trading Book (SEC2), and related to its Capital Requirements – Bank Acting as Originator or Sponsor (SEC3).

Market Risk

Market Risk is a risk in balance sheet and administrative account positions including derivative transactions, due to overall changes in market conditions, including the risk of changes in option prices.

Market risk management is not only limited to risk management, but also supervision of all risks faced by the Bank as a result of movements in market factors (among others, interest rates and exchange rates) that may come from the banking book or trading book. The main objective of risk management for market risk is to minimize the possibility of negative impacts due to changes in market conditions on the Bank's assets and capital.

Organizational Structure of Market Risk Management

The market risk management organizational structure is adapted to the characteristics and complexity of the Bank's business activities. The market risk management organizational structure is described below:

1. The First Line of Defense, is a business unit, particularly the Treasury Division;
2. The Second Line of Defense, the unit being responsible is the Risk Management Division/Integrated; and
3. The Third Line of Defense is the SKAI & Anti-Fraud Division.

Dalam pengelolaan risiko pasar, Bank memiliki *Asset and Liabilities Committee* (ALCO) yang membahas hal-hal terkait pengelolaan risiko pasar yang dilakukan secara berkala.

Manajemen risiko pasar tidak hanya terbatas pada pengelolaan risiko, namun juga pemantauan risiko yang di hadapi Bank akibat pergerakan faktor pasar seperti di antaranya suku bunga dan nilai tukar.

Penerapan manajemen risiko pasar di antaranya dilakukan melalui langkah berikut:
1. Pengelolaan risiko suku bunga dan nilai tukar terhadap instrumen keuangan dalam *trading book* dan *banking book*;
2. Menerapkan beberapa metode untuk memitigasi kerugian yang dapat timbul dari risiko pasar, di antaranya melalui penetapan limit berdasarkan jenjang organisasi dan kebijakan mengenai *limit cut loss* sehingga lebih efektif dalam memonitor risiko pasar yang dihadapi Bank;
3. Melakukan peringatan sejak dini dengan mengukur sensitivitas pendapatan bunga bersih atas pergerakan suku bunga. Bank akan terus mengembangkan dan mengkaji ulang limit-limit risiko pasar seiring dengan berkembangnya produk-produk serta aktivitas fungsional Bank yang berpotensi menimbulkan risiko pasar; dan
4. Melakukan *stress testing* guna menilai ketahanan Bank dalam menghadapi perubahan suku bunga dan harga pasar.

Pengelolaan Portofolio *Trading Book* dan *Banking Book*, serta Metodologi Valuasi yang Digunakan

1. *Trading book* merupakan seluruh posisi instrumen keuangan dalam neraca dan rekening administratif termasuk transaksi derivatif yang dimiliki Bank dengan tujuan untuk diperdagangkan dan dapat dipindahtangankan dengan bebas atau dapat dilindung nilai secara keseluruhan, baik dari transaksi untuk kepentingan sendiri (*proprietary positions*), atas permintaan nasabah maupun untuk kepentingan perantaraan (*brokering*), dan dalam rangka pembentukan pasar (*market making*) dan lindung nilai (*hedging*) atas posisi lainnya dalam *trading book*.

   Pengelolaan risiko *trading book* sebagai berikut:
   a. Pemisahan *trading book* dan *banking book*, setiap transaksi harus secara jelas diakui sebagai *trading book* atau *banking book* sejak transaksi tersebut dibukukan;
   b. Kontrol risiko, semua produk baru maupun variasi dari sebuah produk yang telah disetujui harus dikaji dan disetujui sesuai dengan kebijakan dan prosedur terkait peluncuran produk dan aktivitas baru;
   c. Kontrol valuasi, seluruh posisi *trading* dinilai berdasarkan harga pasar (*marked to market*) secara harian menggunakan harga pasar dari sumber yang independen;
   d. Tata kelola khusus untuk surat berharga, di mana aktivitas transaksi surat berharga harus sesuai dengan limit *trading book* terkini dan kontrol risiko kredit terkait dengan kepemilikan surat berharga; dan

In managing market risk, the Bank has an Asset and Liabilities Committee (ALCO) that periodically discusses matters related to market risk management.

Market risk management is not only limited to risk management, but also supervision of all risks faced by the Bank because of movements in market factors, among others interest rates and exchange rates.

Implementation of market risk management is done, among others, through the following steps:
1. Management of interest rate risk and exchange rate on financial instruments in trading book and banking book;
2. Applying several methods to mitigate losses that may arise from market risk, such as through the establishment of limits based on organizational level and policy on limit for cut loss so that it is more effective in monitoring market risk faced by the Bank;
3. Conducting an early warning by measuring the sensitivity of net interest income on interest rate movements. The Bank will continue to develop and review market risk limits in line with the development of the Bank's products and functional activities that may potentially cause market risk; and
4. Conducting stress testing to assess the Bank's resilience in facing changes in interest rates and market prices.

Portfolio Management of Trading Book and Banking Book, and Valuation Methodology Used

1. The trading book is all positions of financial instruments in the balance sheet and administrative accounts, including derivative transactions owned by the Bank for the purpose of trade, and freely transferable, or hedged as a whole, either from proprietary positions transactions, at the request of customer or for brokering activities, and in order to conduct market making and hedging of other positions in the trading book.

   Trading book risk is managed as follows:
   a. Separation of trading book and banking book, every transaction must be clearly recognized as a trading book or banking book from the time the transaction is recorded;
   b. Risk control, all new products or variations of approved product must be reviewed and approved in accordance with policies and procedures related to the launch of new products and activities;
   c. Valuation control, all trading positions are marked to market on a daily basis by using market prices from independent sources;
   d. Special governance for securities, in which securities transaction activities must be in accordance with current trading book limits and credit risk controls related to securities ownership; and

e. Transaksi ke pasar (*market facing*) dan aktivitas internal suatu *desk* ditugaskan sebagai titik kontak dengan pasar keuangan eksternal untuk melakukan transaksi instrumen yang sama antara dua buku. Hal ini guna menghindari kerugian *bid offer spread* terhadap pihak eksternal.

2. *Banking book* adalah semua posisi yang tidak termasuk dalam *trading book.*
   Pengelolaan portofolio *banking book*, sebagai berikut:
   a. Semua posisi yang dipegang bukan untuk tujuan *trading* ditetapkan sebagai *banking book;*
   b. Tata kelola aktivitas *banking book* berada dalam otoritas ALCO, *Credit Committee*, dan secara umum pengelolaan semua aktivitas *banking book* termasuk portofolio surat berharga aset dan kewajiban lainnya dipusatkan di *Treasury*;
   c. Transfer atau pengklasifikasian ulang dalam portofolio banking book, misalnya antara *Fair Value Through Other Comprehensive Income* (FVTOCI) dan *amortised cost*, mengikuti ketentuan yang berlaku;
   d. Pengelolaan risiko suku bunga dalam *banking book* (IRRBB); dan
   e. Pengelolaan nilai tukar (*foreign exchange risk*) dilakukan dengan meminimalkan eksposur *foreign exchange* terutama dalam *banking book,* di mana ada posisi *foreign exchange* yang tidak dilindungi nilai ditransfer ke *trading book.*
3. Metode Valuasi/*Mark-to Market*
   Salah satu aspek yang paling mendasar dalam pelaksanaan *mark-to-market* adalah prinsip kehati-hatian Bank dalam menentukan metode penilaian (valuasi) yang digunakan untuk setiap instrumen seperti penggunaan metode *mark-to-market*, sumber informasi tentang nilai pasar yang digunakan, perlakuan terhadap instrumen yang kurang/tidak likuid, serta kebijakan pencadangan terhadap nilai keuntungan akibat proses *mark-to-market.*

   Terhadap instrumen keuangan yang diperdagangkan secara aktif, proses valuasi dilakukan dengan menggunakan harga transaksi yang terjadi (*close-out prices*) atau kuotasi pasar dari sumber yang independen. Valuasi terhadap instrumen keuangan menggunakan:
   a. *Bid price* untuk aset yang dimiliki atau kewajiban yang akan diterbitkan; dan/atau
   b. *Ask price* untuk aset yang akan diperoleh atau kewajiban yang dimiliki.

   Bank dapat menetapkan nilai wajar dengan menggunakan suatu model atau teknik penilaian apabila harga pasar tidak tersedia. Valuasi dilakukan secara harian terhadap seluruh posisi *treasury.*

e. Market facing transactions and internal activities of a desk are assigned as point of contact with external financial markets to make transactions in the same instrument between the two books. This is to avoid losses in the bid offer spread to external parties.

2. Banking book refers to all positions that are not included in the trading book.
   Banking book portfolio is managed as follows:
   a. All positions held not for trading purposes are designated as banking book;
   b. The governance of banking book activities is under the authority of ALCO, Credit Committee, and the management of all banking book activities including the portfolio of securities, assets, and other liabilities is generally centralized in the Treasury;
   c. Transfer or reclassification in the banking book portfolio, for example between Fair Value Through Other Comprehensive Income (FVTOCI) and amortised cost, following the applicable regulations;
   d. Management of interest rate risk in the banking book (IRRBB); and
   e. Management of foreign exchange risk is carried out by minimizing foreign exchange exposure, particularly in the banking book, in which unhedged foreign exchange positions are transferred to the trading book.

3. Valuation Method/Mark-to Market
   One of the most fundamental aspects in implementing mark-to-market is the Bank's prudential principles in determining valuation method used for each instrument, such as the use of the mark-to-market method, the source of information about market value used, the treatment of deficient/illiquid instruments, as well as reserve policies for profit values due to the mark-to-market process.

   For financial instruments that are actively traded, the valuation process is carried out using close-out prices or market quotations from independent sources. Valuation of financial instruments uses:

   a. Bid price for assets owned or liabilities to be issued; and/or
   b. Ask price for assets to be acquired or liabilities owned.

   The Bank can determine fair value by using a valuation model or technique if market prices are not available. Valuation is carried out daily on all treasury positions.

Pengukuran Risiko Pasar pada *Trading Book* maupun *Banking Book*

Bank menerapkan beberapa metode dalam mitigasi kerugian yang mungkin timbul dari risiko pasar. Metode pengukuran risiko pasar tersebut di antaranya:

1. Bank menggunakan pendekatan standar mengacu pada ketentuan Otoritas Jasa Keuangan untuk mengukur risiko pasar Kewajiban Penyediaan Modal Minimum dan metrik Risiko Suku Bunga dalam *Banking Book* (IRRBB) yaitu nilai ekonomis ekuitas (EVE) dan pendapatan bunga bersih (NII);
2. *Stress testing* digunakan untuk menilai kemampuan finansial di bawah kejadian-kejadian yang ekstrem tapi mungkin terjadi. Dalam analisis skenario dan *stress testing*, dapat digunakan dengan menggunakan analisis data historis, menggunakan asumsi hipotetis atau menggunakan skenario yang ditetapkan regulator;
3. Pengukuran risiko suku bunga pada posisi *banking book* paling kurang menggunakan model pengukuran *gap report*. *Gap report* menyajikan pos-pos aset, kewajiban, dan rekening administratif yang bersifat *interest rate sensitive* untuk dipetakan ke dalam skala waktu tertentu; dan
4. Proses kaji ulang atau validasi atas model pengukuran risiko pasar dilakukan secara berkala oleh pihak independen antara lain melalui *back testing*, termasuk melakukan penyempurnaan jika diperlukan.

Portofolio (*Trading* dan *Banking Book*) yang Diperhitungkan dalam Kewajiban Penyediaan Modal Minimum

Dalam perhitungan Aktiva Tertimbang Menurut Risiko untuk risiko pasar, Bank mengacu kepada Peraturan Otoritas Jasa Keuangan No. 27 Tahun 2022 tentang Perubahan Kedua atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum bagi Bank Umum, Surat Edaran Otoritas Jasa Keuangan No. 38/SEOJK.03/2016 tentang Pedoman Penggunaan Metode Standar dalam Perhitungan Kewajiban Penyediaan Modal Minimum Bank Umum dengan Memperhitungkan Risiko Pasar, dan Surat Edaran Otoritas Jasa Keuangan No. 23/SEOJK.03/2022 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Pasar.

Pengungkapan Kuantitatif Eksposur Risiko sebagai berikut:

Tabel Pengungkapan Kuantitatif Eksposur Risiko Pasar dengan Menggunakan Metode Standar secara Individual.

Langkah Antisipasi terhadap Risiko Pasar atas Transaksi Mata Uang Asing

Risiko mata uang dapat terjadi apabila Bank dalam posisi *long/overbought* dalam suatu mata uang dan nilai tukarnya turun, sehingga dapat menyebabkan kerugian. Dalam mengantisipasi risiko pasar atas transaksi yang terkait dengan risiko nilai tukar, Bank menetapkan dan melakukan pemantauan atas limit risiko pasar, seperti *limit cut loss* serta *stress test*.

Market Risk Measurement in Trading Book and Banking Book

The Bank applies several methods in mitigating loss that may incur from market risk. Such method among others. These market risk measurement methods include:

1. The Bank uses a standard approach referring to the provisions of the Financial Services Authority to measure market risk. Capital Adequacy Ratio and Interest Rate Risk metrics in the Banking Book (IRRBB), namely economic value of equity (EVE) and net interest income (NII);
2. Stress testing is used to assess financial capabilities under extreme but possible events. Historical data analysis, hypothetical assumptions, or scenarios set by the regulator can be used to analyze scenario and stress testing;
3. Interest rate risk in banking book positions is measured at least by using the gap report measurement model. The gap report presents asset, liability, and administrative account items that are interest rate sensitive to be mapped to a certain time scale; and
4. The process of reviewing or validating the market risk measurement model is carried out periodically by an independent party, among others through back testing, including making improvements if necessary.

Portfolio (Trading and Banking Book) Calculated in Minimum Capital Adequacy Ratio

In calculating Risk Weighted Assets for market risk, the Bank refers to Financial Services Authority Regulation No. 27 of 2022 on the Second Amendment to the Financial Services Authority Regulation No. 11/POJK.03/2016 on Capital Adequacy Ratio for Commercial Banks, Financial Services Authority Circular No. 38/SEOJK.03/2016 on Guidelines on the Use of Standardized Method in Calculating the Capital Adequacy Ratio for Commercial Bank by Calculating Market Risk, and Financial Services Authority Circular No. 23/SEOJK.03/2022 on Calculation of Risk-Weighted Assets for Market Risk.

Information on Quantitative Disclosure of Risk Exposure is as follows:

Table of Quantitative Disclosure of Market Risk Exposure by Using Standardized Method Individually.

Anticipation Steps Against Market Risk on Foreign Currency Transactions

Currency risk can occur if the Bank is in long/overbought position in a currency of which the exchange rate falls, which consequently causes losses. In anticipating market risks on transactions related to exchange rate, the Bank determines and monitors market risk limits, such as cut loss limits and stress tests.

Pengungkapan Mengenai *Interest Rate Risk in Banking Book*

Bank berada dalam kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021 dan tidak memenuhi kriteria untuk mengungkapkan laporan perhitungan *Interest Rate Risk in Banking Book* (IRRBB) sesuai Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018 tanggal 21 Agustus 2018 tentang Penerapan Manajemen Risiko dan Pengukuran Risiko Pendekatan Standar untuk Risiko Suku Bunga dalam *Banking Book* (IRRBB) bagi Bank Umum. Dalam hal mengendalikan risiko suku bunga pada *banking book*, Bank menggunakan analisa sensitivitas berdasarkan *repricing gap* yang disusun dalam rangka pemenuhan ketentuan mengenai penilaian tingkat kesehatan Bank Umum dan penerapan manajemen risiko bagi Bank Umum. Parameter tersebut dapat memberikan indikasi atas risiko terhadap perspektif nilai ekonomis Bank yang timbul dari pergerakan suku bunga yang memengaruhi permodalan dan perspektif pendapatan bunga bersih yang memengaruhi rentabilitas Bank.

Disclosure of Information on the Interest Rate Risk in Banking Book

The Bank is within the Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021 and does not meet the criteria to disclose calculation report of Interest Rate Risk in Banking Book (IRRBB) in accordance with Financial Services Authority Circular No. 12/SEOJK.03/2018 dated 21 August 2018 on the Implementation of Risk Management and Risk Measurement Using Standardized Approach for Interest Rate Risk in the Banking Book (IRRBB) for Commercial Banks. In terms of controlling the interest rate risk in banking book, the Bank uses sensitivity analysis based on the repricing gap prepared in order to fulfill the provisions on the sound rating of Commercial Banks and the implementation of risk management at Commercial Banks. This parameter may provide an indication of the risks to the Bank's economic value perspective arising from interest rate scenario movement affecting capital and net interest income perspective which affect the Bank's profitability.

Risiko Likuiditas

Risiko likuiditas adalah risiko akibat ketidakmampuan Bank untuk memenuhi kewajiban yang jatuh tempo dari sumber pendanaan arus kas dan/atau dari aset likuiditas berkualitas tinggi yang dapat diagunkan tanpa mengganggu aktivitas keuangan Bank. Risiko likuiditas dikategorikan menjadi:

1. Risiko likuiditas pasar
   Risiko yang timbul karena Bank tidak mampu melakukan *off setting* posisi tertentu dengan harga pasar.
2. Risiko likuiditas pendanaan
   Risiko yang timbul karena Bank tidak mampu mencairkan asetnya atau memperoleh pendanaan dari sumber dana lainnya.

Ketidakmampuan memperoleh sumber pendanaan arus kas dapat menimbulkan risiko likuiditas yang disebabkan oleh:

1. Ketidakmampuan menghasilkan arus kas yang berasal dari aset produktif maupun yang berasal dari penjualan aset termasuk aset likuid; dan
2. Ketidakmampuan menghasilkan arus kas yang berasal dari penghimpunan dana, transaksi antar Bank, dan pinjaman yang diterima.

Tujuan utama manajemen risiko untuk risiko likuiditas adalah untuk meminimalkan kemungkinan ketidakmampuan Bank dalam memperoleh sumber pendanaan arus kas.

Tata Kelola Pengelolaan Risiko Likuiditas

1. *Risk appetite* dan toleransi risiko dikaji oleh *Risk Taking Unit* minimal setahun sekali, serta harus mendapat persetujuan Komite Manajemen Risiko atau Direksi dan Dewan Komisaris. Setiap pelanggaran *risk appetite* dan toleransi risiko harus

Liquidity Risk

Liquidity risk is a risk due to the Bank's inability to meet its due liabilities from the funding cash flows and/or from high quality liquid assets that can be pledged, without disrupting the Bank's financial activity. The liquidity risk is categorized into:

1. Market liquidity risk
   The risk arising due to the Bank is unable to offset certain positions at market prices.
2. Funding liquidity risk
   The risk arising due to the Bank is unable to withdraw the assets or obtain funding from other sources of funds.

Inability to acquire cash flows of source of fund can cause liquidity risk resulting from:

1. Inability to generate cash flows from earning assets or from the sale of assets including liquid assets; and
2. Inability to generate cash flows from fund raising, interbank transactions, and loans.

The main objective of risk management for liquidity risk is to minimize the possibility of the Bank's inability to obtain source of fund for cash flow.

Liquidity Risk Management Governance

1. Risk appetite and risk tolerance are reviewed by the Risk Taking Unit at least once a year, and such review must obtain approval from the Risk Management Committee or the Board of Directors and Board of Commissioners. Any violation of risk

dieskalasi hingga ke Dewan Komisaris dan/atau tingkat Komite Dewan Komisaris terkait seperti Komite Pemantau Risiko;
2. Kebijakan manajemen risiko likuiditas harus disetujui oleh Komite Manajemen Risiko atau ALCO yang dikaji secara berkala dan memenuhi persyaratan regulasi;
3. Limit risiko likuiditas harus disetujui oleh ALCO. Limit tersebut harus dikaji paling sedikit setiap tahun dengan mempertimbangkan strategi bisnis dan *risk appetite* Bank;
4. Likuiditas Bank dikelola secara tersentralisasi oleh *Treasury*; dan
5. Validasi model pengukuran risiko harus dilakukan secara berkala oleh pihak yang independen dari pengembang dan pengguna model tersebut.

Struktur Organisasi Manajemen Risiko Likuiditas

Struktur organisasi manajemen risiko likuiditas telah dirancang agar dapat bekerja secara optimal dengan mengutamakan prinsip kehati-hatian melalui implementasi *dual control process* serta pemantauan secara harian atas indikator peringatan dini likuiditas Bank. Struktur organisasi manajemen risiko likuiditas diuraikan sebagai berikut:

1. Lini Pertahanan Pertama adalah semua unit bisnis;
2. Lini Pertahanan Kedua adalah Divisi *Risk Management/ Integrated* dan Divisi *Compliance & System Procedure*;
3. Lini Pertahanan Ketiga adalah Divisi SKAI & *Anti Fraud.*

Strategi Pendanaan

Strategi bidang pendanaan diprioritaskan pada upaya menjaga dan meningkatkan loyalitas nasabah dan menambah nasabah baru dengan target pertumbuhan yang berbasis struktur pendanaan yang sehat dan optimal. Strategi pendanaan di antaranya mencakup strategi diversifikasi sumber dan jangka waktu pendanaan yang dikaitkan dengan karakteristik dan Rencana Bisnis Bank. Dalam hal ini Bank mengidentifikasi dan memantau faktor utama yang memengaruhi kemampuan Bank untuk memperoleh dana, termasuk mengidentifikasi dan memantau alternatif pendanaan yang dapat memperkuat kapasitasnya untuk bertahan pada kondisi krisis.

Mitigasi Risiko Likuiditas

Dalam memitigasi risiko likuiditas, Bank menetapkan indikator peringatan dini, di antaranya dengan menentukan *risk appetite* dan *risk tolerance/limit* melalui beberapa indikator keuangan seperti rasio alat likuid terhadap dana pihak ketiga dan rasio alat likuid terhadap *non-core* deposit yang adaptif terhadap perubahan.

Stress Testing Risiko Likuiditas

Bank mengembangkan *stress testing* likuiditas untuk memastikan Bank memiliki akses sumber likuiditas yang cukup untuk bertahan pada kondisi *stress event* untuk periode tertentu yang telah ditentukan. *Stress testing* merupakan metode yang

appetite and risk tolerance must be escalated to the Board of Commissioners and/or the relevant Board of Commissioners Committee level, such as the Risk Monitoring Committee;
2. The liquidity risk management policy must be approved by the Risk Management Committee or ALCO, reviewed periodically and fulfilling the regulatory requirements;
3. Liquidity risk limits must be approved by ALCO. This limit must be reviewed at least annually by considering the Bank's business strategy and risk appetite;
4. The Bank's liquidity is managed centrally by the Treasury; and
5. Validation of risk measurement models must be carried out periodically by parties independent of the developers and users of the model.

Liquidity Risk Management Organization

The liquidity risk management organizational structure has been designed to work optimally by prioritizing prudential principles through the implementation of dual control processes and daily monitoring of the Bank's liquidity early warning indicators. The liquidity risk management organizational structure is described below:

1. The First Line of Defense is all business units;
2. The Second Line of Defense is the Risk Management/ Integrated Division and the Compliance & System Procedure Division;
3. The Third Line of Defense is SKAI & Anti Fraud Division.

Funding Strategy

The funding strategies are prioritized on efforts to maintain and increase customer loyalty and add new customers with a growth target based on a sound and optimal funding structure. The funding strategy includes a diversification strategy of funding sources and time period that link to the Bank's characteristics and business plans. In this matter, the Bank identifies and monitors the main factors affecting the Bank's ability to obtain funds, including identifying and monitoring alternative funding that can strengthen its capacity to withstand crisis conditions.

Mitigation of Liquidity Risk

In mitigating liquidity risk, the Bank establishes early warning indicators, among others by determining risk appetite and risk tolerance/limit through several financial indicators such as the ratio of liquid assets to third party deposits and the ratio of liquid assets to non-core deposits that are adaptive to change.

Stress Testing of Liquidity Risk

The Bank develops liquidity stress testing to ensure the Bank has access to sufficient liquidity sources to survive stress event conditions for a certain predetermined period. Stress testing is an important method in managing liquidity to ensure that the Bank

penting dalam pengelolaan likuiditas untuk memastikan Bank selalu berada pada posisi dapat memenuhi seluruh kewajibannya, membayar kembali deposan, memenuhi komitmen pemberian pinjaman, dan memenuhi komitmen lainnya yang dibuat baik dalam kondisi normal maupun stres.

Hasil *stress test* risiko likuiditas dapat menjadi masukan dalam melakukan kaji ulang terhadap kebijakan dan strategi manajemen risiko likuiditas, komposisi aset, kewajiban dan/atau rekening administratif, rencana pendanaan darurat (*contingency funding plan)* dan penetapan limit.

Pengelolaan Risiko Likuiditas pada Saat Krisis

Dalam menghadapi krisis likuiditas, Bank telah memiliki *Liquidity Contingency Plan* (LCP) yang secara formal menetapkan strategi untuk menghadapi krisis likuiditas dan prosedur untuk menutup defisit arus kas dalam situasi darurat. LCP mencakup kebijakan, strategi, prosedur dan rencana tindak untuk memastikan kemampuan Bank memperoleh sumber pendanaan yang diperlukan secara tepat waktu dan dengan biaya yang wajar. Dokumen tersebut disosialisasikan kepada unit-unit terkait agar dapat memahami tugas dan tanggung jawabnya masing-masing.

Pengungkapan Risiko Likuiditas

1. Pengungkapan Mengenai *Liquidity Coverage Ratio*
   Bank kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021 dan tidak memenuhi kriteria untuk mengungkapkan laporan *Liquidity Covered Ratio* (LCR) sesuai Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 tentang Kewajiban Pemenuhan Rasio Kecukupan Likuiditas bagi Bank Umum.
2. Pengungkapan *Nett Stable Funding Ratio*
   Bank kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021 dan tidak memenuhi kriteria untuk mengungkapkan laporan *Nett Stable Funding Ratio* sesuai Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 tentang Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih bagi Bank Umum.

Risiko Operasional

Risiko operasional adalah risiko akibat ketidakcukupan dan/atau tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, dan/atau adanya kejadian-kejadian eksternal yang memengaruhi operasional Bank.

Tujuan utama manajemen risiko untuk risiko operasional adalah untuk meminimalkan kemungkinan dampak negatif dari tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, dan/atau kejadian-kejadian eksternal.

Manajemen risiko operasional dilakukan secara konsisten terhadap kerangka kerja serta dengan menentukan strategi dan mitigasi guna memperoleh keseimbangan yang optimal antara

is always in a position to fulfill all its obligations, repay depositors, fulfill loan commitments, and fulfill other commitments made both under normal and stressed conditions.

The results of the liquidity risk stress test can be used as input for reviewing liquidity risk management policies and strategies, composition of assets, liabilities, and/or administrative accounts, contingency funding plan, and limit setting.

Liquidity Risk Management in Times of Crisis

To deal with liquidity crisis, the Bank already has a Liquidity Contingency Plan (LCP) that formally sets out strategies to deal with liquidity crisis and procedures to cover cash flow deficits in emergency situations. LCP includes policies, strategies, procedures, and action plans to ensure the Bank's ability to obtain the necessary source of fund in a timely manner and at a reasonable cost. The document is disseminated to the relevant units so that such units can understand their respective duties and responsibilities.

Disclosure of Liquidity Risk

1. Disclosure of Liquidity Coverage Ratio Value
   Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021 and does not meet the criteria to disclose Liquidity Coverage Ratio (LCR) report, in accordance with Financial Services Authority Regulation No. 42/POJK.03/2015 on the Obligation of Fulfillment of Liquidity Coverage Ratio for Commercial Banks.
2. Disclosure of Net Stable Funding Ratio
   Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021 and does not meet the criteria to disclose Net Stable Funding Ratio report, in accordance with Financial Services Authority Regulation No. 50/POJK.03/2017 on the Obligation of Fulfillment of Net Stable Funding Ratio for Commercial Banks.

Operational Risk

Operational Risk is risk due to inadequacy and/or malfunction of internal process, human error, system failure, and/or external incidents affecting the Bank's operations.

The main objective of risk management for operational risk is to minimize the possible negative impacts of non-functioning internal processes, human errors, system failures, and/or external events.

Operational risk management is carried out consistently on framework and by determining strategies and mitigation in order to obtain maximum balance between operational risk

paparan risiko operasional, efektivitas mekanisme kontrol, dan pembuatan *risk appetite.*

Struktur Organisasi Manajemen Risiko Operasional

Penerapan manajemen risiko operasional banyak melibatkan berbagai pihak dalam Bank melalui penerapan pertahanan berlapis (*three lines of defense*) yang berfungsi sebagai berikut:

1. *First Line of Defense* merupakan unit bisnis dan unit pendukung yang berperan sebagai *risk taker*;
2. *Second Line of Defense* adalah Unit *Anti Money Laundering* (AML) dan Divisi *Risk Management/Integrated*; dan
3. *Third Line Defense* merupakan unit yang dijalankan Divisi SKAI & *Anti Fraud.*

Dalam pengelolaan risiko operasional, di samping Komite Manajemen Risiko, Bank memiliki komite lain di antaranya Komite Teknologi Informasi, Komite Pengadaan, Komite Produk, dan Komite Personalia untuk menunjang operasional Bank yang secara efektif dapat menekan kerugian akibat risiko operasional.

Mekanisme yang Digunakan Bank untuk Mengidentifikasi dan Mengukur Risiko Operasional

Proses identifikasi dan pengukuran risiko dilakukan melalui penerapan perangkat manajemen risiko operasional, yakni *risk register* dengan tujuan untuk mengidentifikasi risiko-risiko pada aktivitas fungsional risiko operasional, sehingga kerugian maksimum yang mungkin timbul di masa mendatang dapat diminimalisir. *Risk Register* yang dipergunakan untuk pelaksanaan manajemen risiko operasional sebagai berikut:

1. *Risk and Control Self-Assessment*
   Risk and Control Self-Assessment (RCSA) merupakan alat untuk mengidentifikasi dan mengukur risiko operasional yang bersifat kualitatif dan prediktif dengan menggunakan dimensi dampak dan kemungkinan kejadian. RCSA umumnya difokuskan pada risiko-risiko yang memiliki dampak terhadap kemampuan Bank dalam menjaga kelangsungan bisnis dan operasional. Proses penilaian risiko dilakukan dengan melakukan *self-assessment* tentang evaluasi tingkat risiko, yang mencakup kemungkinan kejadian, besarnya dampak, dan tingkat efektivitas kontrol. Selanjutnya, RCSA mendeteksi kecukupan internal kontrol Bank untuk mencegah penyimpangan/kegagalan yang terjadi, serta menerapkan pengendalian risiko operasional yang tepat untuk mengelola risiko operasional agar tetap berada dalam tingkatan toleransi risiko operasional.
2. *Key Risk Indicator*
   Key Risk Indicator (KRI) adalah perangkat yang lazim digunakan untuk mengidentifikasi dan menganalisis risiko sejak dini (*early warning*) atas naik-turunnya indikator-indikator tingkat risiko operasional yang melekat pada setiap aktivitas bisnis dan operasional Bank. Manfaat KRI antara lain dapat memantau dan memprediksi eksposur risiko operasional, serta mengidentifikasi perubahan profil risiko

exposure, effectiveness of control mechanism, and risk appetite establishment.

Operational Risk Management Organizational

The operational risk management implementation highly involves many parties in the Bank through the implementation of three lines of defense which function as follows:

1. First line of defense is a business unit and supporting unit that functions as risk taker;
2. Second Line of Defense is the Anti-Money Laundering (AML) Unit and Risk Management/Integrated Division; and
3. Third Line Defense is a unit run by the SKAI & Anti Fraud Division.

In managing operational risk, in addition to the Risk Management Committee, the Bank has other committees including the Information Technology Committee, Procurement Committee, Product Committee, and Personnel Committee to support the Bank's operations which can effectively reduce losses due to operational risk.

Mechanism Used by the Bank to Identify and Measure Operational Risk

Risk identification and measurement process is performed by applying operational risk management tools, namely risk register aimed to identify risks in operational risk functional activities so that maximum losses that may arise in the future can be minimized. The Risk Registers used for the implementation of operational risk management are as follows:

1. Risk and Control Self-Assessment
   Risk and Control Self-Assessment (RCSA) is a tool for identifying and measuring operational risks that are qualitative and predictive using the dimensions of impact and possible events. RCSA is generally focused on risks that have an impact on the Bank's ability to maintain its business and operational sustainability. The risk assessment process is carried out by conducting self-assessment of risk level evaluation, including possible events, magnitude of impacts, and control effectiveness level. Furthermore, RCSA detects the adequacy of the Bank's internal control to prevent any deviations/failures, and to apply appropriate operational risk controls to manage operational risk in order to stay within the operational risk tolerance level.

2. Key Risk Indicator
   Key Risk Indicator (KRI) is a common tool used to identify and analyze early warning on the upward and downward movement of indicators of operational risk level that is inherent in every business activity and operation of the Bank. KRI benefits include monitoring and predicting operational risk exposures and identifying changes of operational risk profile. The main risk indicators provide information on the

operasional. Indikator risiko utama memberikan informasi tentang risiko potensial kerugian di masa depan. Ambang batas (pemicu) dapat didefinisikan untuk KRI dan dapat berfungsi sebagai indikator dalam sistem peringatan dini.

3. *Loss Event Database*
   Loss Event Database (LED) merupakan alat/perangkat manajemen risiko operasional yang digunakan untuk mencatat/mengelola data kejadian yang telah terjadi dalam operasional Bank. *Database* kerugian, baik yang bersifat potensial maupun aktual merupakan prasyarat penting dalam proses penyusunan model pengukuran kerugian risiko operasional dan sebagai alat untuk melakukan validasi setiap proses penilaian risiko atau prediksi risiko.

risk of potential losses in the future. Thresholds (triggers) can be defined for KRI and can serve as indicators in an early warning system.

3. Loss Event Database
   Loss Event Database (LED) is an operational risk management tool/instrument used to record/manage incident data occurred during the Bank's operations. The database of losses, both potential and actual, is an important pre-requisite in the process of formulating measurement model of operational risk loss and as a tool for validating every risk assessment or risk prediction process.

Risiko operasional *inheren* (risiko yang melekat/*gross*) dan risiko residual diukur dengan menggunakan matriks Penilaian Risiko Operasional dengan mempertimbangkan dampak dan kemungkinan risiko itu sendiri. *Risk Taking Unit* harus mengukur bahwa kontrol memadai dan memastikan kelengkapan, keberadaan, keakuratan, otorisasi, penilaian, kepemilikan, penyajian dan pelaporan transaksi dan/atau proses.

Inherent operational risk (gross risk) and residual risk are measured by using the Operational Risk Assessment matrix by considering the impact and possibility of the risk itself. The Risk Taking Unit must measure that controls are adequate and ensure completeness, existence, accuracy, authorization, assessment, ownership, presentation, and reporting of transactions and/or processes.

Mekanisme untuk Memitigasi Risiko Operasional

Guna memitigasi risiko operasional, Bank telah melakukan peningkatan sumber daya manusia melalui pendidikan dan pelatihan secara berkelanjutan. Hal tersebut bertujuan agar kemampuan karyawan dalam melaksanakan tugas dapat berjalan dengan lebih baik. Selain itu, Bank telah melakukan evaluasi dan revisi atas kebijakan dan sistem prosedur yang sudah ada, memeriksa akses level, dan limit-limit transaksi sesuai dengan tugas dan tanggung jawab masing-masing karyawan, mengembangkan teknologi informasi serta menerapkan sistem pengendalian internal.

Operational Risk Mitigation Mechanism

In order to mitigate operational risk, the Bank has increased its human resources by carrying out continuous education and training. This is intended for enhancing employees' ability so that they can perform their duties properly. Furthermore, the Bank has also evaluated and revised the existing policies and system procedures, examined access level and transaction limits according to each employee's duties and responsibilities, developed information technology and applied internal control system.

Untuk menjaga kelangsungan bisnis terhadap peristiwa yang tidak diinginkan, Bank mempunyai *Business Continuity Management* (BCM) dan juga telah memiliki *lokasi off site back up* yang digunakan pada saat pengujian BCM. Dalam penanggulangan bencana, Bank memiliki pusat data *(data center)* dan pusat penanggulangan bencana (*disaster recovery center*) yang terdapat di 2 (dua) lokasi berbeda di dalam negeri. Hal ini akan memungkinkan sistem-sistem penting, termasuk sistem inti, serta sistem pembayaran, dan sistem pelaporan regulator yang tetap berjalan jika terjadi bencana.

In order to maintain its business continuity against undesired events, the Bank has Business Continuity Management (BCM) and also already has an offsite back up location used during the BCM testing. In disaster management, the Bank has data center and disaster recovery center located in 2 (two) different locations within the country. This will enable the critical systems, including core systems, as well as payment systems, and regulatory reporting systems, to keep operating at times of disaster.

Pengungkapan Risiko Operasional

Dalam perhitungan Aset Tertimbang Menurut Risiko untuk risiko operasional, Bank mengacu kepada Peraturan Otoritas Jasa Keuangan No. 27 Tahun 2022 tentang Perubahan Kedua atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bagi Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 06/SEOJK.03/2020 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Operasional dengan Menggunakan Pendekatan Standar bagi Bank Umum.

Disclosure of Operational Risk

In calculating Risk Weighted Assets for operational risk, the Bank refers to Financial Services Authority Regulation No. 27 of 2022 on the Second Amendment to the Financial Services Authority Regulation No. 11/POJK.03/2016 on Minimum Capital Adequacy Ratio for Commercial Banks and Financial Services Authority Circular No. 06/SEOJK.03/2020 on Calculation of Risk-Weighted Assets for Operational Risk by Using Standardized Approach for Commercial Banks.

Pengungkapan Kuantitatif Eksposur Risiko sebagai berikut:

Tabel Pengungkapan Kuantitatif Risiko Operasional Bank secara Individual.

Risiko Hukum

Risiko hukum merupakan risiko akibat tuntutan hukum dan/atau kelemahan aspek yuridis. Risiko hukum dapat bersumber antara lain dari kelemahan aspek yuridis yang disebabkan oleh lemahnya perikatan yang dilakukan oleh Bank, ketiadaan dan/atau perubahan peraturan perundang-undangan yang menyebabkan suatu transaksi yang telah dilakukan Bank menjadi tidak sesuai dengan ketentuan, dan proses litigasi, baik yang timbul dari gugatan pihak ketiga terhadap Bank maupun Bank terhadap pihak ketiga.

Tujuan utama manajemen risiko untuk risiko hukum adalah untuk memastikan bahwa proses manajemen risiko dapat meminimalkan kemungkinan dampak negatif dari kelemahan aspek yuridis, ketiadaan dan/atau perubahan peraturan perundang-undangan, dan proses litigasi.

Struktur Organisasi Manajemen Risiko Hukum

Penerapan manajemen risiko hukum banyak melibatkan berbagai pihak dalam Bank melalui penerapan pertahanan berlapis (*three lines of defense*) yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama, merupakan semua divisi;
2. Lini Pertahanan Kedua, terdiri dari Divisi *Corporate Legal*, Divisi *Credit Legal*, dan Divisi *Compliance & System Procedure*; dan
3. Lini Pertahanan Ketiga adalah Divisi SKAI & *Anti Fraud.*

Mekanisme Pengendalian Risiko Hukum

Langkah yang dilakukan dalam upaya mitigasi risiko hukum meliputi:

1. Standardisasi dokumen hukum terkait produk atau fasilitas perbankan yang ditawarkan oleh Bank kepada masyarakat. Dokumen tersebut dibuat dengan mengacu kepada ketentuan peraturan perundangan yang berlaku, serta memperhatikan kepentingan aspek yuridis dari Bank;
2. Memberikan opini hukum atas penyelenggaraan produk baru Bank sebelum diperkenalkan atau dipasarkan ke masyarakat;
3. Memantau perkembangan kasus-kasus hukum yang terjadi dan memberikan perhatian khusus atas kasus hukum yang berpotensi menimbulkan kerugian;
4. Memberikan informasi dan pengetahuan hukum kepada unit-unit terkait;
5. Memastikan perjanjian-perjanjian dan dokumen dengan nasabah dan/atau pihak ketiga lainnya dilakukan sesuai dengan ketentuan yang berlaku;
6. Melakukan evaluasi atas dokumen-dokumen atau perjanjian-perjanjian guna mengamankan kepentingan hukum Bank; dan
7. Meningkatkan kemampuan dan pengetahuan sumber daya manusia, serta pengkajian atas perkara litigasi yang telah terjadi.

Quantitative Disclosure of Risk Exposure is as follows:

Table of Quantitative Disclosure of Operational Risk Bank Individually.

Legal Risk

Legal risk is a risk as a result of lawsuits and/or weakness of juridical aspect. Legal risk can be sourced from, among others, weaknesses in the juridical aspects caused by weak commitments made by the Bank, absence and/or changes in laws and regulations that cause a transaction made by the Bank becomes not in accordance with the provisions, and litigation processes either arising from third party claims against the Bank or the Bank against third parties.

The main objective of risk management for legal risk is to ensure that the risk management process minimizes the possibility of negative impact from weakness of juridical aspects, the absence of and/or amendment to laws and regulations and litigation process.

Organizational Structure of Legal Risk Management

The legal risk management implementation highly involves many parties in the Bank through the implementation of three lines of defense which function as follows:

1. The First Line of Defense, constitutes all divisions;
2. The Second Line of Defense, consists of the Corporate Legal Division, Credit Legal Division, and Compliance & System Procedure Division; and
3. The Third Line of Defense is SKAI & Anti Fraud Division.

Legal Risk Control Mechanism

Measures taken in the effort to mitigate legal risk includes:

1. Standardizing the legal documents related to banking products or facilities offered by the Bank to the public which will be made in accordance with the prevailing laws and regulations and taking into account the Bank's juridical aspect;
2. Providing legal opinion on the Bank's new products before launching or promoting to the public;
3. Monitoring the progress of legal cases and paying special attention to legal cases having the potential to cause loss;
4. Providing legal information and knowledge to relevant units;
5. Ensuring that agreements and documents with customers and/or other third parties are carried out in accordance with the applicable regulations;
6. Evaluating documents or agreements to safeguard the Bank's legal interests; and
7. Increasing the capabilities and knowledge of human resources, as well as reviewing litigation cases that have occurred.

Risiko Reputasi

Risiko reputasi adalah risiko yang terkait atas persepsi negatif terhadap Bank yang dapat bersumber dari berbagai kejadian yang tidak diinginkan, antara lain publikasi negatif atas operasional Bank, pelanggaran etika bisnis, keluhan nasabah, kelemahan tata kelola dan kejadian-kejadian lainnya yang dapat mengakibatkan penurunan citra Bank.

Tujuan utama manajemen risiko untuk risiko reputasi adalah untuk mengantisipasi dan meminimalkan dampak kerugian dari risiko reputasi Bank.

Struktur Organisasi Manajemen Risiko Reputasi

Pengelolaan risiko reputasi melibatkan berbagai pihak dalam Bank melalui penerapan pertahanan berlapis *(three lines of defense)* yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama merupakan Direksi dan seluruh karyawan;
2. Lini Pertahanan Kedua, terdiri dari Divisi *Corporate Secretary* dan Divisi *Risk Management/Integrated*; dan
3. Lini Pertahanan Ketiga adalah Divisi SKAI & *Anti Fraud*.

Kebijakan dan Mekanisme dalam Rangka Meningkatkan Kualitas Pelayanan kepada Nasabah dan Pemangku Kepentingan Lainnya untuk Mengendalikan Risiko Reputasi

Bank telah membentuk layanan *contact center* yang secara khusus menangani keluhan nasabah melalui layanan telepon 24 jam dan melakukan monitoring atas keluhan nasabah serta tindak lanjutnya. Dalam rangka pengendalian risiko reputasi, Bank melakukan beberapa hal di antaranya:

1. Tersedianya ketentuan penanganan pengaduan nasabah yang secara jelas mengatur kebijakan, prosedur, unit kerja yang melakukan pemantauan dan pelaporan seputar penanganan pengaduan nasabah; serta
2. Pemantauan terhadap jumlah dan penyelesaian pengaduan nasabah serta pemberitaan negatif tentang Bank Victoria.

Pengelolaan Risiko Reputasi pada Saat Krisis

1. Pengelolaan krisis komunikasi dikoordinasikan oleh pihak internal dan eksternal Bank termasuk media massa dengan alur protokol komunikasi dan penanggung jawab komunikasi; dan
2. Bank memiliki *business continuity plan* untuk meminimalisasi gangguan usaha Bank dan mempercepat proses pemulihan krisis pada risiko reputasi.

Risiko Stratejik

Risiko stratejik adalah risiko akibat ketidaktepatan dalam pengambilan dan/atau pelaksanaan suatu keputusan strategis, serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Ketidakmampuan Bank dalam melakukan penyusunan

Reputation Risk

Reputation risk is a risk associated with negative perceptions on the Bank that can be sourced from various undesirable events, such as negative publicity of the Bank's operations, violations of business ethics, customer complaints, governance weaknesses, and other incidents that can result in a decrease image of the Bank.

The main objective of risk management for reputation risk is to anticipate and minimize the impact of losses from the Bank's reputation risk.

Organizational Structure of Reputation Risk Management

Reputation risk management involves various parties within the Bank through the implementation of three lines of defense which function as follows:

1. The First Line of Defense is the Board of Directors and all employees;
2. The Second Line of Defense, consists of the Corporate Secretary Division and Risk Management/Integrated Division; and
3. The Third Line of Defense is SKAI & Anti Fraud Division.

Policies and Mechanism in the Framework of Increasing Service Quality to Customers and Other Stakeholders to Control Reputation Risk

The Bank has established a contact center service that specifically handles customer complaints through 24-hour telephone service and monitors customer complaints and their follow-up. In order to control reputation risk, the Bank, among others, conducts the following matters:

1. The availability of provisions for handling customer complaints that clearly regulate policies, procedures, work units that monitor and report on the handling of customer complaints; and
2. Monitoring the number and settlement of customer complaints as well as negative news about Bank Victoria.

Reputation Risk Management in Times of Crisis

1. The management of communication crisis coordinated by the Bank's internal and external parties, including mass media under the flow of communication protocol and the person in charge of communication; and
2. The Bank has a business continuity plan to minimize the Bank's business disruption and accelerate crisis recovery process of reputation risk.

Strategic Risk

Strategic Risk is a risk as a result of incorrectness in making and/or implementing a strategic decision, as well as failure in anticipating changes in the business environment. The Bank's inability to formulate appropriate strategies may result in the

strategi yang tepat dapat menimbulkan kegagalan bisnis Bank di masa yang akan datang. Risiko ini juga mencakup kemampuan Bank dalam mengembangkan daya saing dan menciptakan keunggulan kompetitif Bank di tengah kompetisi perbankan yang semakin ketat.

Tujuan utama manajemen risiko untuk risiko stratejik adalah memastikan bahwa proses manajemen risiko dapat meminimalkan kemungkinan dampak negatif dari ketidaktepatan pengambilan keputusan stratejik dan kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Bank menetapkan dan mencapai tujuan strategis untuk memberikan hasil yang optimal bagi pemangku kepentingan dengan tetap menjaga keseimbangan antara risiko dan keuntungan, sejalan dengan perubahan kondisi makro ekonomi dan kebutuhan nasabah.

Bank selalu mengevaluasi kinerja bisnis dari waktu ke waktu yang disesuaikan dengan perubahan internal maupun eksternal Bank guna memperkecil risiko stratejik Bank.

Struktur Organisasi Manajemen Risiko Stratejik

Pengelolaan risiko stratejik melibatkan berbagai pihak dalam Bank melalui penerapan pertahanan berlapis (*three lines of defense*) yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama merupakan Direksi, *Senior Executive Vice President*, dan Unit Bisnis;
2. Lini Pertahanan Kedua, terdiri dari Divisi *Corporate Secretary*, Divisi *Accounting*, dan Divisi *Risk Management/Integrated*; dan
3. Lini Pertahanan Ketiga adalah Divisi SKAI & *Anti Fraud.*

Bank memiliki sistem pengendalian internal untuk manajemen risiko stratejik, mencakup pengawasan secara berkala atas kinerja Bank yang berdampak pada pendapatan usaha dan budaya pengendalian risiko stratejik yang melibatkan seluruh lini bisnis Bank.

Kebijakan Bank dalam Mengidentifikasi dan Merespons Perubahan Lingkungan Bisnis, baik Eksternal maupun Internal

Penyusunan strategi Bank dituangkan dalam rencana bisnis Bank melalui serangkaian diskusi yang melibatkan jajaran manajemen. Kebijakan umum atau arahan strategis yang dirumuskan Bank adaptif terhadap perubahan lingkungan, baik internal maupun eksternal dan dilakukan dalam perspektif jangka pendek maupun jangka menengah, yang dikaji ulang secara berkala minimal setahun sekali.

Bank selalu mengevaluasi kinerja bisnis dari waktu ke waktu yang disesuaikan dengan perubahan internal maupun eksternal Bank guna memperkecil risiko stratejik Bank, seperti melakukan langkah strategis di tengah ketidakpastian ekonomi dengan mempertimbangkan dan menyesuaikan beberapa aktivitas yang dilakukan secara manual atau konvensional ke dalam proses digitalisasi.

failure of the Bank's business in the future. This risk also includes the Bank's ability to develop competitiveness and create a competitive advantage in the midst of the increasingly tight banking competition.

The main objective of risk management for strategic risk is to ensure that the risk management process can minimize the potential negative impact of inaccuracy of strategic decision making and failure in anticipating changes in the business environment. The Bank sets and achieves strategic objectives to provide optimal results for stakeholders while maintaining a balance between risk and profit, in line with changes in macroeconomic conditions and customer needs.

The Bank always evaluates the business performance from time to time in accordance with the Bank's internal and external changes to minimize the Bank's strategic risks.

Organizational Structure of Strategic Risk Management

Strategic management involves various parties within the Bank through the implementation of three lines of defense which function as follows:

1. The First Line of Defense is the Board of Directors, Senior Executive Vice President, and Business Units;
2. The Second Line of Defense, consists of the Corporate Secretary Division, Accounting Division, and Risk Management/Integrated Division; and
3. The Third Line of Defense is SKAI & Anti Fraud Division.

The Bank has an internal control system for strategic risk management, which includes regular monitoring of the Bank's performance that have an impact on business revenues, and a strategic risk control culture that involves all of the Bank's business lines.

Bank Policies to Identify and Respond to Changes in Business Environment, External and Internal

The formulation of the Bank's strategy set forth in the Bank's business plan through a series of discussions involving management ranks. The general policies or strategic directions formulated by the Bank are made adaptive to internal and external environment changes and carried out in a short-term and medium-term perspective, reviewed periodically at least once a year.

The Bank always evaluates the business performance from time to time in accordance with the Bank's internal and external changes to minimize the Bank's strategic risks, such as taking strategic steps in the midst of economic uncertainty by considering and adjusting several activities carried out manually or conventionally to the digitalization process.

Mekanisme untuk Mengukur Kemajuan yang Dicapai dari Rencana Bisnis yang Ditetapkan

Pemantauan dan evaluasi atas pencapaian kinerja keuangan Bank terhadap target yang telah disusun mendapatkan perhatian penuh dari manajemen Bank, yang secara khusus menjadi pembahasan dalam rapat Direksi secara rutin setiap bulan atau antara Dewan Komisaris dengan Direksi.

Risiko Kepatuhan

Risiko kepatuhan adalah risiko akibat Bank tidak mematuhi dan/atau tidak melaksanakan peraturan perundang-undangan dan ketentuan yang berlaku. Kegagalan dalam mengelola risiko kepatuhan tersebut dapat menyebabkan Bank terkena sanksi dan denda dari regulator serta berdampak terhadap kelangsungan usaha Bank, sehingga dapat memengaruhi tata kelola Bank.

Risiko kepatuhan dapat bersumber dari perilaku hukum, yaitu perilaku atau aktivitas Bank yang menyimpang atau melanggar dari ketentuan dan/atau peraturan perundang-undangan. Sedangkan perilaku organisasi, yaitu perilaku atau aktivitas Bank yang menyimpang atau bertentangan dari standar yang berlaku secara umum.

Tujuan utama manajemen risiko untuk risiko kepatuhan adalah untuk memastikan bahwa proses manajemen risiko dapat meminimalkan kemungkinan dampak negatif yang menyimpang atau melanggar standar dan/atau peraturan dan perundang-undangan yang berlaku.

Struktur Organisasi Manajemen Risiko Kepatuhan

Pengelolaan risiko kepatuhan melibatkan berbagai pihak dalam Bank melalui penerapan pertahanan berlapis (*three lines of defense*) yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama merupakan *Risk Taking Unit* atau unit bisnis dan/atau fungsi pendukung yang bergerak atau mendukung aktivitas penghasil pendapatan yang memiliki dan mengelola risiko;
2. Lini Pertahanan Kedua terdiri dari Divisi Kepatuhan, Unit *Anti Money Laundering* (AML) dan Divisi *Risk Management/ Integrated* ; dan
3. Lini Pertahanan Ketiga adalah SKAI & *Anti Fraud.*

Penerapan manajemen risiko kepatuhan melibatkan berbagai pihak dalam Bank. Organisasi manajemen risiko kepatuhan melibatkan pengawasan aktif Dewan Komisaris dan Direksi yang berperan mengawasi kebijakan dan pelaksanaan fungsi kepatuhan dalam pengelolaan risiko kepatuhan serta mewujudkan terlaksananya budaya kepatuhan pada semua tingkatan organisasi dan kegiatan usaha Bank. Untuk mendukung pelaksanaan fungsi risiko kepatuhan tersebut, Bank membentuk Komite Implementasi dan Pemantauan GCG.

Mechanism to Measure Progress Achieved from the Defined Business Plan

Monitoring and evaluation of the Bank's financial performance achievement against the targets set have received the Bank's management full attention, which is specifically discussed in the Board of Directors' meetings regularly on a monthly basis or between the Board of Commissioners and the Board o Directors.

Compliance Risk

Compliance risk is a risk due to the Bank's failure to comply with and/or enforce the applicable laws and regulations. Failure to manage compliance risk may cause the Bank to be subject to sanctions and penalties from the regulator, and therefore, affecting the Bank's business continuity and governance.

Compliance risk may arise from legal behavior, which is the Bank's behavior or activity that deviates from or violates the provisions and/or laws and regulations. Whereas organizational behavior, which is the Bank's behavior or activity that deviates from or in contrary to the generally accepted standards.

The main objective of risk management for compliance risk is to ensure that the risk management process can minimize the possibility of negative impacts that deviates or violates the generally accepted standards and/or laws and regulations.

Organizational Structure of Compliance Risk Management

Compliance management involves various parties within the Bank through the implementation of three lines of defense which function as follows:

1. The First Line of Defense is Risk Taking Unit or business unit and/or supporting function that operates or supports income-generating activities that own and manage risk;
2. The Second Line of Defense consists of the Compliance Division, Anti Money Laundering (AML) Unit, and Risk Management/Integrated Division; and
3. The Third Line of Defense is SKAI & Anti Fraud.

The implementation of compliance risk management involves various parties within the Bank. The compliance risk management organization involves active supervision of the Board of Commissioners and the Board of Directors whose role is to oversee the policy and implementation of compliance function in managing compliance risk and realizing the implementation of a compliance culture at all levels of the organization and the Bank's business activities. To support the implementation of compliance risk function, the Bank established GCG Implementation and Monitoring Committee.

Strategi Manajemen Risiko dan Efektivitas Penerapan Manajemen Risiko Kepatuhan

Penerapan manajemen risiko kepatuhan disesuaikan dengan ukuran dan kompleksitas usaha Bank tidak terlepas dari pengawasan aktif Dewan Komisaris dan Direksi dalam merumuskan strategi dengan memperhatikan tingkat risiko yang akan diambil dan risiko toleransi guna mendorong terciptanya budaya kepatuhan, menetapkan sistem dan prosedur yang akan digunakan untuk penyusunan ketentuan dan pedoman internal Bank, serta melakukan tindakan pencegahan agar kebijakan dan/atau keputusan tidak menyimpang dari ketentuan dan perundang-undangan yang berlaku.

Adapun strategi yang diterapkan Bank dalam penerapan manajemen risiko kepatuhan, di antaranya sebagai berikut:

1. Arahan dari Top Manajemen, Direksi yang dikoordinasikan oleh kepatuhan mengembangkan dan mengimplementasikan budaya kepatuhan di dalam organisasi. Kepatuhan merupakan bagian dari *Key Performance Indicator* Bank dan disosialisasikan melalui pesan Direktur, pelatihan Bank, dan berbagai pendekatan lainnya;
2. Menetapkan program Kode Etik dan kepatuhan, di mana Dewan dan Manajemen Senior, dan semua staf berbagi rasa tanggung jawab untuk melindungi aset reputasi dan keuangan Bank melalui budaya perilaku etis dan kepatuhan terhadap peraturan internal dan eksternal;
3. Membangun Budaya Perusahaan yang berintegritas, yang diturunkan dari atas ke bawah. Budaya integritas adalah inti dari program etika dan kepatuhan yang efektif;
4. Penilaian risiko terhadap risiko yang signifikan dan risiko konsentrasi tertinggi dalam organisasi, dan memberikan tindakan dasar yang diperlukan untuk menghindari, memitigasi, atau memulihkan risiko tersebut;
5. Program pengujian dan pemantauan yang kuat untuk membantu memastikan lingkungan pengendalian efektif; dan
6. Tindakan penegakan hukum seperti pemantauan berkelanjutan terhadap kewajiban peraturan.

Pemantauan dan Pengendalian Risiko Kepatuhan

Pemantauan dan pengendalian yang dilakukan dalam manajemen risiko kepatuhan antara lain dengan:

1. Melakukan uji kepatuhan untuk memastikan Bank mematuhi ketentuan yang berlaku;
2. Memantau dampak finansial dan non-finansial dari ketidakpatuhan Bank terhadap regulasi secara berkala;
3. Melakukan pemantauan Kepatuhan Bulanan *Key Risk Indicator* (KRI);
4. Mewujudkan terlaksananya budaya kepatuhan pada seluruh kegiatan usaha Bank di setiap jenjang organisasi, antara lain melalui pelaksanaan sosialisasi dan pelatihan atas ketentuan dan aturan yang berlaku, serta memberikan masukan dan saran kepada unit-unit lain untuk memastikan kepatuhan Bank;
5. Memberikan nasihat kepatuhan untuk direkomendasikan/ dilaksanakan kepada unit kerja terkait, sehubungan dengan masalah kepatuhan dan AML, penilaian kepatuhan atas tinjauan fasilitas kredit, serta penilaian atas permasalahan kepatuhan dalam kebijakan internal/prosedur/produk/aksi korporasi;

Risk Management Strategy and Effectiveness of Compliance Risk Management Implementation

The implementation of compliance risk management is adjusted to the Bank's business size and complexity, which is inseparable from the active supervision of the Board of Commissioners and Board of Directors in formulating strategies by considering the risk appetite and risk tolerance in order to promote the creation of a compliance culture, to establish system and procedure that will be used for the preparation of the Bank's internal provisions and guidelines, and to take preventive actions so that the policies and/or decisions do not deviate from the applicable provisions, laws and regulations.

Strategies implemented by the Bank in implementing compliance risk management include the following:

1. Direction from the Top Management, Board of Directors coordinated by compliance to develop and implement a culture of compliance within the organization. Compliance is part of the Bank's Key Performance Indicators and is disseminated through Board of Directors' messages, the Bank's training, and other approaches;
2. Establishing Code of Conduct and compliance program, in which the Board and Senior Management, and all staff share a sense of responsibility to protect the Bank's reputation and financial assets through a culture of ethical behavior and compliance with internal and external regulations;
3. Establishing a Company Culture with integrity, which is passed down from the top to the bottom. A culture of integrity is at the heart of an effective ethics and compliance program;
4. Risk assessment of significant risks and highest concentration risks within the organization, and providing basic actions required to avoid, mitigate, or remediate such risks;
5. A robust testing and monitoring program to help ensure an effective control environment; and
6. Enforcement actions such as ongoing monitoring of regulatory obligations.

Monitoring and Controlling Compliance Risk

Monitoring and control carried out in compliance risk management include:

1. Carrying out compliance test to ensure that the Bank complies with the applicable regulations;
2. Monitoring financial and non-financial impacts of the Bank's non-compliance with regulations on a regular basis;
3. Monitoring Monthly Key Risk Indicator (KRI) Compliance;
4. Achieving the implementation of compliance culture at all of the Bank's business activities at every organizational level, through dissemination and training on the prevailing rules and regulations, and providing input and advice to other units to ensure the Bank's compliance;
5. Providing compliance advice to be recommended/ implemented to related units, in connection with compliance and AML issues, compliance assessment of credit facility reviews, as well as assessment of compliance issues in internal policies/procedures/products/corporate actions;

6. Menilai dan mengevaluasi kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan dan peraturan yang berlaku;
7. Memantau atas pelaksanaan prinsip kehati-hatian Bank;
8. Mengelola risiko kepatuhan, selain dilakukan melalui uji kepatuhan, juga dilakukan melalui pemantauan terhadap pemenuhan komitmen Bank kepada regulator, baik berdasarkan hasil pemeriksaan regulator maupun melalui korespondensi antara Bank dengan regulator; dan
9. Penerapan Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme di perbankan yang terdiri dari 5 (lima) prinsip utama, yaitu:
   a. Pengawasan aktif Dewan Komisaris dan Direksi;
   b. Kebijakan dan prosedur;
   c. Pengendalian internal;
   d. Sistem informasi manajemen; dan
   e. Sumber daya manusia dan pelatihan.

6. Assessing and evaluating the adequacy and conformity of the Bank's policies, regulations, systems, and procedures against the applicable provisions and regulations;
7. Monitoring the implementation of the Bank's prudential principles;
8. Managing compliance risk, in addition to conducting compliance tests, is also conducted through monitoring on the Bank's commitment to the regulator, either based on regulatory examination results or through correspondence between the Bank and the regulator; and
9. Implementing Anti Money Laundering and Counter-Terrorism Funding in banking consisting of 5 (five) main principles, which are:
   a. Active monitoring of the Board of Commissioners and Board of Directors;
   b. Policies and procedures;
   c. Internal control;
   d. Management information system; and
   e. Human resources and training.

Risiko terkait Iklim

Di tengah dinamika industri perbankan yang terus berkembang, perubahan iklim telah muncul sebagai faktor risiko yang signifikan bagi dunia perbankan. Bank menghadapi sejumlah risiko terkait iklim yang dapat memengaruhi keseimbangan keuangan, reputasi, dan kontribusi terhadap stabilitas ekonomi secara keseluruhan. Beberapa risiko terkait iklim yang dihadapi adalah risiko kredit, risiko pasar, risiko operasional, dan risiko reputasi.

Pada risiko kredit, perubahan iklim dapat memberikan dampak signifikan pada kinerja keuangan debitur, terutama bagi sektor yang rentan terhadap perubahan iklim, seperti pertanian, energi, atau real estat. Kondisi cuaca ekstrem, seperti badai atau kekeringan dapat merugikan kemampuan debitur untuk memenuhi kewajiban sehingga dapat menyebabkan meningkatnya tingkat kredit macet.

Risiko pasar juga menjadi perhatian, terutama dalam hal aset yang terkait dengan sektor yang rentan terhadap perubahan iklim, seperti investasi dalam proyek energi fosil menjadi tidak berkelanjutan seiring dengan meningkatnya regulasi dan tekanan masyarakat terhadap energi terbarukan. Nilai aset-aset tersebut dapat mengalami penurunan yang signifikan jika tidak dikelola dengan baik.

Selain itu, risiko operasional dapat meningkat seiring dengan frekuensi dan intensitas peristiwa cuaca ekstrem. Gangguan operasional akibat banjir, badai, atau kejadian iklim lainnya dapat menyebabkan penurunan efisiensi operasional, kerugian finansial, dan bahkan kerugian data jika tidak ada langkah-langkah mitigasi yang tepat.

Aspek reputasi juga merupakan risiko yang signifikan. Bank semakin diawasi oleh masyarakat dan pemangku kepentingan terkait tanggung jawab lingkungan dan sosial. Keterlibatan

Climate-related Risks

In the midst of the ever-changing banking industry, climate change has emerged as a significant risk factor for the banking world. Banks face a number of climate-related risks that can affect their financial balance, reputation, and contribution to overall economic stability. Some of the climate-related risks faced are credit risk, market risk, operational risk, and reputation risk.

\In credit risk, climate change may have a significant impact on debtors' financial performance, particularly for sectors that are vulnerable to climate change, such as agriculture, energy, or real estate. Extreme weather conditions, such as storms or drought, can harm debtors' ability to meet obligations, which may lead to increased levels of bad loans.

Market risk is also a concern, especially in assets related to sectors that are vulnerable to climate change, such as investment in fossil energy projects that turns unsustainable as regulations and public pressure on renewable energy increase. The value of such assets may significantly decline if not managed properly.

Furthermore, operational risk may increase along with the frequent and intense extreme weather events. Operational disruptions due to floods, storms, or other climate events may lead to decline in operational efficiency, financial loss, and even data loss if appropriate mitigation measures are not in place.

Reputation aspect is also a significant risk. Banks are increasingly monitored by the public and stakeholders regarding environmental and social responsibility. Involvement in financial activities that

dalam kegiatan keuangan yang mendukung industri-industri beremisi tinggi atau merugikan lingkungan dapat merugikan reputasi Bank dan mengurangi kepercayaan nasabah.

Aspek risiko iklim menjadi salah satu aspek penting dalam pengambilan keputusan pembiayaan dalam memastikan keberlanjutan portofolio investasi. Integrasi risiko terkait iklim ke dalam aspek tata kelola, strategi bisnis, dan kerangka kerja manajemen risiko menjadi hal yang krusial sebagai bentuk penerapan prinsip kehati-hatian serta prinsip *just and fair transition for all* dalam mewujudkan pencapaian *Nett Zero Emission* (NZE) di tahun 2060 atau lebih awal.

Menghadapi risiko terkait iklim ini, Bank mengintegrasikan pertimbangan iklim dalam strategi bisnis. Bank mengadopsi praktik keuangan berkelanjutan, melakukan evaluasi risiko iklim terpadu, dan mengembangkan skenario stres iklim untuk memahami dampak potensialnya terhadap portofolio. Selain itu, Bank juga berupaya mendukung proyek-proyek hijau dan berinvestasi dalam inovasi teknologi yang berkontribusi pada mitigasi perubahan iklim.

Evaluasi terhadap Efektivitas Manajemen Risiko

Penerapan sistem manajemen risiko dievaluasi secara berkala oleh Divisi *Risk Management/Integrated* bersama Divisi/Unit terkait. Evaluasi dilakukan untuk mengidentifikasi kelemahan-kelemahan pelaksanaan pengendalian internal agar Bank dapat mengambil langkah yang tepat untuk meningkatkan strategi pengelolaan risiko sesuai dengan dinamika perkembangan Bank.

Pernyataan Dewan Komisaris dan Direksi atas Kecukupan Manajemen Risiko

Dewan Komisaris dan Direksi menilai penerapan sistem manajemen risiko tahun 2023 telah berjalan dengan baik. Seluruh potensi risiko yang teridentifikasi pada tahun buku tersebut dapat dikendalikan dengan disertai langkah-langkah mitigasi yang tepat dan efektif.

support high-emission industries or harm the environment can harm the Bank's reputation and reduce customer trust.

The climate risk aspect is an important aspect in making finance decisions in order to ensure the sustainability of investment portfolios. The integration of climate-related risk into aspects of governance, business strategy, and risk management framework is crucial as a form of application of the prudential principles and just and fair transition for all principle in realizing the achievement of Net Zero Emissions (NZE) in 2060 or earlier.

Facing these climate-related risks, the Bank integrates climate considerations into business strategy. The bank adopts sustainable finance practices, conducts integrated climate risk evaluations, and develops climate stress scenarios to understand their potential impact on the portfolio. In addition, the Bank also seeks to support green projects and invest in technology innovations that contribute to mitigate the climate change.

Evaluation of Risk Management Effectiveness

The implementation of risk management system is evaluated periodically by the Risk Management/Integrated Division together with related Divisions/Units. Evaluation is carried out to identify weaknesses in the implementation of internal control so that the Bank can take appropriate steps to improve its risk management strategy in accordance with the dynamics of the Bank's development.

Statement of the Board of Commissioners and Board of Directors on the Adequacy of Risk Management

The Board of Commissioners and Board of Directors consider that the risk management system implementation in 2023 has run properly. All potential risks identified in the fiscal year were under control with appropriate and effective mitigation measures.

Manajemen Risiko Grup Keuangan Victoria
Victoria Financial Group Risk Management

Industri lembaga jasa keuangan memiliki sistem keuangan yang kompleks, dinamis, dan saling terkait antar sektor jasa keuangan yang menyebabkan meningkatnya eksposur risiko. Untuk mengatasi kondisi tersebut, Grup Keuangan Victoria menerapkan manajemen risiko secara komprehensif dan terintegrasi.

Financial services institution industry has complex and dynamic financial system and are interrelated among financial services leading to the increase in risk exposure. To overcome such condition, Victoria Financial Group implements the risk management in a comprehensive and integrated manner.

Dasar Penerapan Manajemen Risiko pada Grup Keuangan Victoria

Berdasarkan Surat Otoritas Jasa Keuangan No. S-66/ PB.33/2021 tanggal 23 Juni 2021 tentang Perubahan Status Konglomerasi Keuangan Grup Victoria menjadi Grup Keuangan Victoria beserta lampirannya, dan tidak bertentangan dengan ketentuan Peraturan Otoritas Jasa Keuangan terkait Konglomerasi Keuangan dan Kewajiban Penyediaan Modal Minimum Terintegrasi bagi Konglomerasi Keuangan sepanjang dinyatakan tetap berlaku, seperti:

1. Peraturan Otoritas Jasa Keuangan No. 17/POJK.03/2014 tanggal 18 November 2014 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan;
2. Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2014 tanggal 18 November 2014 tentang Penerapan Tata Kelola Terintegrasi bagi Konglomerasi Keuangan; dan
3. Peraturan Otoritas Jasa Keuangan No. 26/POJK.03/2015 tanggal 11 Desember 2015 tentang Kewajiban Penyediaan Modal Minimum Terintegrasi bagi Konglomerasi Keuangan.

Basis of Risk Management Implementation in Victoria Financial Group

Based on the Financial Services Authority Letter No. S-66/PB.33/2021 dated 23 June 2021 on Changes in Status of Victoria Group Financial Conglomeration to Victoria Financial Group and its attachments, this does not conflict with the provisions of Financial Services Authority Regulations regarding Financial Conglomeration and Integrated Minimum Capital Adequacy Requirement for Financial Conglomeration, as long as it remains valid, among others:

1. Financial Services Authority Regulation No. 17/POJK.03/2014 dated 18 November 2014, on Implementation of Integrated Risk Management for Financial Conglomeration;
2. Financial Services Authority Regulation No. 18/POJK.03/2014 dated 18 November 2014 on Implementation of Integrated Governance for Financial Conglomeration; and
3. Financial Services Authority Regulation No. 26/POJK.03/2015 dated 11 December 2015 on Integrated Minimum Capital Adequacy Requirement for Financial Conglomeration.

Anggota Grup Keuangan Victoria

Pada tahun 2023, lembaga jasa keuangan yang tergabung dalam Grup Keuangan Victoria meliputi:

1. PT Bank Victoria International Tbk (Entitas Koordinator);
2. PT Bank Victoria Syariah;
3. PT Victoria Manajemen Investasi;
4. PT Victoria Sekuritas Indonesia;
5. PT Victoria Insurance Tbk; dan
6. PT Victoria Alife Indonesia.

Bank Victoria telah ditunjuk sebagai Entitas Koordinator dalam Grup Keuangan Victoria berdasarkan Surat Otoritas Jasa Keuangan No. S-66/PB.33/2021 tanggal 23 Juni 2021 perihal Perubahan Status Konglomerasi Keuangan Grup Victoria menjadi Grup Keuangan Victoria.

Dalam rangka penerapan manajemen risiko yang komprehensif dan efektif, Entitas Koordinator perlu membentuk organisasi manajemen risiko secara terintegrasi dalam Grup Keuangan Victoria, antara lain Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria dan Satuan Kerja Manajemen Risiko Terintegrasi.

Members of Victoria Financial Group

In 2023, financial services institutions that are members of the Victoria Financial Group included:

1. PT Bank Victoria International Tbk (Coordinating Entity);
2. PT Bank Victoria Syariah;
3. PT Victoria Manajemen Investasi;
4. PT Victoria Sekuritas Indonesia;
5. PT Victoria Insurance Tbk; dan
6. PT Victoria Alife Indonesia.

Bank Victoria has been appointed as the Coordinator Entity within Victoria Financial Group based on the Financial Services Authority Letter No. S-66/PB.33/2021 dated 23 June 2021 on Changes in Status of Victoria Group Financial Conglomeration to Victoria Financial Group.

In order to implement comprehensive and effective risk management, the Coordinating Entity needs to establish an integrated risk management organization within the Victoria Financial Group, among others the Integrated Risk Management Committee in Victoria Financial Group and Integrated Risk Management Unit.

Satuan Kerja Manajemen Risiko Terintegrasi melakukan pemantauan eksposur risiko pada anggota Grup Keuangan Victoria serta memberikan informasi kepada Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria akan hal-hal yang perlu ditindaklanjuti terkait hasil evaluasi dari pemantauan terhadap penerapan manajemen risiko secara terintegrasi.

Penerapan manajemen risiko pada Grup Keuangan Victoria secara terintegrasi dilakukan melalui pendekatan berdasarkan risiko dengan prinsip-prinsip:

1. Agregasi Risiko
   Penilaian risiko didasarkan pada risiko yang terdapat dalam Grup Keuangan Victoria secara menyeluruh dengan memperhatikan dampak yang ditimbulkan terhadap kondisi Grup Keuangan Victoria.
2. Holistik
   Penilaian risiko dilakukan dengan melihat keterkaitan antara satu faktor dengan faktor lainnya, sehingga diperoleh kesimpulan yang memberikan gambaran mengenai risiko Grup Keuangan Victoria secara keseluruhan.
3. Signifikansi/Materialitas dan Proporsionalitas
   Penilaian risiko dilakukan dengan memperhatikan signifikansi/materialitas risiko secara proporsional pada Grup Keuangan Victoria secara keseluruhan dengan memperhatikan struktur, karakteristik, dan kompleksitas dari Grup Keuangan Victoria.
4. Komprehensif dan terstruktur, yaitu penilaian risiko dilakukan dengan analisis mendalam dengan memperhatikan faktor-faktor penilaian secara luas, lengkap, dan utuh.

Pilar Penerapan Manajemen Risiko Grup Keuangan Victoria secara Terintegrasi

Pengawasan Dewan Komisaris dan Direksi Entitas Koordinator

Dewan Komisaris dan Direksi Entitas Koordinator memastikan atas efektivitas penerapan Manajemen Risiko dalam Grup Keuangan Victoria.

Selain melaksanakan wewenang dan tanggung jawab dalam rangka penerapan manajemen risiko Grup Keuangan Victoria, Dewan Komisaris dan Direksi Entitas Koordinator juga tetap melaksanakan wewenang dan tanggung jawabnya dalam rangka penerapan manajemen risiko pada Entitas Koordinator, sesuai dengan ketentuan yang berlaku bagi Entitas Koordinator.

Kecukupan Kebijakan, Prosedur, dan Penetapan Limit

Kebijakan manajemen risiko Grup Keuangan Victoria merupakan arahan tertulis dalam menerapkan manajemen risiko sesuai dengan karakteristik dan kompleksitas kegiatan dan praktik usaha yang sehat. Dalam mendukung efektivitas penerapan manajemen risiko Grup Keuangan Victoria secara terintegrasi, di mana dalam pelaksanaannya telah dilengkapi dengan Kebijakan Manajemen Risiko Grup Keuangan Victoria yang disesuaikan dengan strategi

The Integrated Risk Management Unit is tasked with monitoring risk exposure of Victoria Financial Group members and providing information to the Integrated Risk Management Committee within Victoria Financial Group on matters requiring follow up on the evaluation results from monitoring integrated risk management implementation.

The integrated risk management in Victoria Financial Group is implemented through a risk-based approach with the following principles:

1. Risk Aggregation
   Comprehensive risk assessment based on risks found in Victoria Financial Group by considering the arising impact on Victoria Financial Group's condition.
2. Holistic
   Risk assessment performed by looking at the link between one factor and another in order to reach a conclusion that gives an overall picture of risks in Victoria Financial Group.
3. Significance/Materiality and Proportionality
   Risk assessment carried out with due regard to the risk significance/materiality in a proportional manner in Victoria Financial Group as a whole, by considering the structure, characteristics, and complexity of Victoria Financial Group.
4. Comprehensive and structured, means risk assessment carried out in an in-depth analysis by considering comprehensive, complete, and intact assessment factors.

Pillars of Integrated Risk Management Implementation of Victoria Financial Group

Supervision of the Board of Commissioners and Board of Directors of the Coordinating Entity

The Board of Commissioners and Board of Directors of the Coordinating Entity ensure the effectiveness of Risk Management implementation in Victoria Financial Group.

Apart from exercising authority and responsibilities in order to implement risk management in Victoria Financial Group, the Board of Commissioners and Board of Directors of the Coordinating Entity also exercise their authority and responsibilities in order to implement risk management in the Coordinating Entity, in accordance with the provisions applicable to the Coordinating Entity.

Adequacy of Policies, Procedures, and Limit

Establishment The risk management policies of Victoria Financial Group are written direction in implementing risk management in accordance with the characteristics and complexity of activities and sound business practices. In supporting the effectiveness of integrated risk management implementation in Victoria Financial Group, its implementation has been equipped with Victoria Financial Group Risk Management Policies that are

manajemen risiko dengan memperhatikan tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) atau limit sesuai karaterisktik dan kompleksitas usaha Grup Keuangan Victoria.

Kecukupan Proses Identifikasi, Pengukuran, Pemantauan dan Pengendalian serta Sistem Informasi Manajemen Risiko

Secara berkesinambungan, Grup Keuangan Victoria terus menyempurnakan proses manajemen risiko secara komprehensif. Hal tersebut bertujuan agar informasi yang berpotensi merugikan secara terintegrasi dalam Grup Keuangan Victoria dapat diketahui sedini mungkin, sehingga dapat mengambil tindakan yang memadai untuk memitigasi dampak risiko seminimal mungkin.

Proses identifikasi risiko dilakukan secara proaktif, termasuk dampak yang ditimbulkan. Selanjutnya, dilakukan pengukuran, pemantauan, dan pengendalian terhadap seluruh aktivitas usaha masing-masing Grup Keuangan Victoria yang didukung oleh sistem informasi manajemen risiko secara memadai.

Pada proses manajemen risiko Grup Keuangan Victoria secara terintegrasi, seluruh lembaga jasa keuangan di dalam Grup Keuangan Victoria saling bersinergi dalam melaksanakan aktivitas bisnis/transaksi dengan tetap mengacu kepada prinsip *arm length* dan pengelolaan yang berbasis risiko.

Sistem Pengendalian Internal terhadap Penerapan Manajemen Risiko Terintegrasi

Melalui fungsi pengendalian internal, Grup Keuangan Victoria senantiasa melakukan upaya-upaya untuk mengelola dan mengendalikan risiko. Dalam rangka melaksanakan pengendalian risiko, Entitas Koordinator memastikan grup keuangan memiliki metode *risk base approach* untuk mengendalikan risiko atas risiko yang dapat membahayakan kelangsungan usaha grup keuangan.

Secara umum, pengendalian internal terdiri dari serangkaian prosedur atau proses yang memastikan organisasi tetap pada jalurnya untuk mencapai tujuan yang ditetapkan. Adapun proses pengendalian aktivitas operasional masing-masing Grup Keuangan Victoria dilakukan melalui tindakan-tindakan pengendalian pada setiap tindakan dalam struktur organisasi. Hal tersebut bertujuan untuk memastikan:

1. Kepatuhan terhadap kebijakan atau ketentuan internal serta peraturan perundang-undangan yang berlaku;
2. Tersedianya informasi keuangan dan manajemen yang lengkap, akurat, tepat guna, dan tepat waktu; dan
3. Efektivitas budaya risiko *(risk culture)* pada organisasi grup keuangan secara menyeluruh.

Penjelasan di atas tertuang dalam Surat Keputusan Direksi No. 003/SK-DIR/08/21 tanggal 20 Agustus 2021 tentang Kebijakan dan Pedoman Umum Manajemen Risiko Grup Keuangan Victoria.

adjusted to the risk management strategies by considering the risk appetite and risk tolerance or limits. According to Victoria Financial Group's business characteristics and complexity.

Adequacy of Process of Risk Identification, Measurement, Monitoring, and Control, as well as Risk Management Information System

On an ongoing basis, Victoria Financial Group keeps improving its risk management process comprehensively. This is intended so that information on potential harm in an integrated manner within Victoria Financial Group can be detected as early as possible, so that sufficient actions can be taken to mitigate the risk impact to be as minimum as possible.

Risk identification process is performed pro-actively, including all impacts that may be incurred. Thereafter, all business activities of each Victoria Financial Group are measured, monitored, and controlled, with adequate support of risk management information system.

In the integrated risk management process of Victoria Financial Group, all financial services institutions within Victoria Financial Group are in synergy in carrying out business activities/ transactions by still referring to the principle of arm length and risk-based management.

Internal Control System on Integrated Risk Management Implementation

Through internal control function, Victoria Financial Group always makes efforts to manage and control the risks. In order to implement risk control, the Coordinating Entity ensures that the financial group has a risk-based approach method to control risks for risks that may endanger the financial group's business continuity.

In general, internal control consists of a set of procedures or processes that ensure the organization stays on track to achieve its stated objectives. The operational activity control process of each member of Victoria Financial Group is carried out through control activities in every action within the organization structure. This is carried out with intention to ensure:

1. Compliance with internal policies and provisions, and the applicable laws and regulations;
2. The availability of financial and management information that is complete, accurate, appropriate, and timely; and
3. The effectiveness of risk culture in the financial group organization in overall.

The aforementioned explanation is contained in the Board of Directors' Decision Letter No. 003/SK-DIR/08/21 dated 20 August 2021 on Risk Management Policies and General Guidelines of Victoria Financial Group.

Struktur Organisasi dan Keanggotaan Manajemen Risiko Grup Keuangan Victoria

Terkait dengan penerapan manajemen risiko terintegrasi dalam Grup Keuangan Victoria, maka Entitas Koordinator telah membentuk:

1. Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria; dan
2. Satuan Kerja Manajemen Risiko Terintegrasi.

Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria

Uraian terkait Komite Manajemen Risiko Terintegrasi dalam Grup Keuangan Victoria dapat dilihat pada bab Tata Kelola Perusahaan pada Laporan Tahunan ini.

Satuan Kerja Manajemen Risiko Terintegrasi

Satuan Kerja Manajemen Risiko Terintegrasi merupakan pejabat eksekutif yang berada satu tingkat di bawah Direksi yang memimpin satuan kerja operasional dan/atau fungsi/satuan kerja manajemen risiko. Pada Entitas Koordinator, *Risk Management/ Integrated Division* dipimpin oleh seorang Kepala Divisi yang bertanggung jawab langsung kepada Direktur Kepatuhan dan Manajemen Risiko.

Satuan Kerja Manajemen Risiko Terintegrasi merupakan satuan kerja independen yang terpisah dengan satuan kerja yang melaksanakan fungsi pengendalian internal dan Satuan Kerja Operasional pada setiap anggota Grup Keuangan Victoria. Selain itu, dalam penerapan manajemen risiko secara terintegrasi dalam Grup Keuangan Victoria harus bebas dari benturan kepentingan antara anggota Grup Keuangan Victoria dengan Entitas Koordinator.

Untuk memastikan efektivitas dan kecukupan sistem manajemen risiko terintegrasi, Satuan Kerja Manajemen Risiko Terintegrasi secara berkesinambungan terus melakukan pengelolaan risiko dan peninjauan ulang secara berkala.

Organizational Structure and Composition of Victoria Financial Group Risk Management

In relation to the integrated risk management implementation within Victoria Financial Group, the Coordinating Entity has established:

1. Integrated Risk Management Committee within Victoria Financial Group; and
2. Integrated Risk Management Work Unit.

Integrated Risk Management Committee in Victoria Financial Group

Description of the Financial Group Risk Management Committee can be found in the Corporate Governance chapter of this Annual Report.

Integrated Risk Management Work Unit

The Integrated Risk Management Work Unit is the executive officer of one level below the Board of Director, who is in charge of an operational work unit and/or risk management function/work unit. In the Coordinator Entity, the Risk Management/Integrated Division is led by a Division Head who is directly responsible to the Director of Compliance and Risk Management.

The Integrated Risk Management Work Unit Is an independent work unit separated from the work unit performing the internal control function and Operational Work Unit (risk taking unit) in each member of Victoria Group financial conglomeration. Furthermore, implementation of integrated risk management shall be free from conflict of interest among members of Victoria Group financial conglomeration and the Main Entity.

To ensure the effectiveness and adequacy of the integrated risk management system, the Integrated Risk Management Unit continuously manages the risk by conducting periodic reassessment.

Tabel Utama (*Key metrics*) - Bank secara individual
Main Table (Key Metrics) - Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No	Deskripsi	Periode Period					Description
		31 Desember 2023 31 December 2023 (Audited)	30 September 2023 30 September 2023	30 Juni 2023 30 June 2023	31 Maret 2023 31 March 2023	31 Desember 2022 31 December 2022 (Audited)	
	Modal yang Tersedia (nilai)						Available Capital
1.	Modal Inti Utama (CET1)	3.287.239	3.243.320	3.254.998	3.248.197	3.201.440	
2.	Modal Inti (*Tier* 1)	3.287.239	3.243.320	3.254.998	3.248.197	3.201.440	
3.	Total Modal	3.820.092	3.793.696	3.841.623	3.881.434	3.876.115	
	Aset Tertimbang Menurut Risiko (Nilai)						
4	Total Aset Tertimbang Menurut Risiko (ATMR)	19.150.900	18.275.488	18.419.711	16.259.931	17.640.015	
	Rasio Modal berbasis Risiko dalam bentuk persentase dari ATMR						
5	Rasio CET1 (%)	17,16%	17,75%	17,67%	17,90%	18,15%	
6	Rasio *Tier* 1 (%)	17,16%	17,75%	17,67%	17,90%	18,15%	
7	Rasio Total Modal (%)	19,95%	20,76%	20,86%	21,39%	21,97%	
	Tambahan CET1 yang berfungsi sebagai *buffer* dalam bentuk persentase dari ATMR *						
8	*Capital conservation buffer* (2.5% dari ATMR) (%)	0,00%	0,00%	0,00%	0,00%	0,00%	
9	*Countercyclical Buffer* (0 - 2.5% dari ATMR) (%)	0,00%	0,00%	0,00%	0,00%	0,00%	
10	*Capital Surcharge* untuk Bank Sistemik (1% - 2.5%) (%)	0,00%	0,00%	0,00%	0,00%	0,00%	
11	Total CET1 sebagai *buffer* (Baris 8 + Baris 9 + Baris 10)	0,00%	0,00%	0,00%	0,00%	0,00%	
12	Komponen CET1 untuk *buffer*	12,66%	0,00%	0,00%	0,00%	0,00%	
	Rasio pengungkit sesuai Basel III *						
13	Total Eksposur	31.777.040	29.589.067	28.735.844	27.624.629	27.470.064	
14	Nilai Rasio Pengungkit, termasuk dampak dari penyesuaian terhadap pengecualian sementara atas penempatan giro pada Bank Indonesia dalam rangka memenuhi ketentuan GWM (jika ada)	10,84%	11,59%	12,04%	12,51%	12,31%	
14b	Nilai Rasio Pengungkit, tidak termasuk dampak dari penyesuaian terhadap pengecualian sementara atas penempatan giro pada Bank Indonesia dalam rangka memenuhi ketentuan GWM (jika ada)	10,34%	11,00%	11,33%	11,76%	12,02%	

No	Deskripsi	Periode Period					Description
		31 Desember 2023 31 December 2023 (Audited)	30 September 2023 30 September 2023	30 Juni 2023 30 June 2023	31 Maret 2023 31 March 2023	31 Desember 2022 31 December 2022 (Audited)	
14c	Nilai Rasio Pengungkit, termasuk dampak dari penyesuaian terhadap pengecualian sementara atas penempatan giro pada Bank Indonesia dalam rangka memenuhi ketentuan GWM (jika ada), yang telah memasukkan nilai rata-rata dari nilai tercatat aset Securities Financing Transaction (SFT) secara *gross*	10,85%	11,55%	12,04%	12,51%	12,04%	
14d	Nilai Rasio Pengungkit, tidak termasuk dampak dari penyesuaian terhadap pengecualian sementara atas penempatan giro pada Bank Indonesia dalam rangka memenuhi ketentuan GWM (jika ada), yang telah memasukkan nilai rata-rata dari nilai tercatat aset SFT secara *gross*	10,34%	10,96%	11,33%	11,76%	11,65%	
	Rasio Kecukupan Likuiditas (LCR) **						
15	Total Aset Likuid Berkualitas Tinggi (HQLA)	0,00	0,00	0,00	0,00	0,00	
16	Total Arus Kas Keluar Bersih (*net cash outflow*)	0,00	0,00	0,00	0,00	0,00	
17	LCR (%)	0,00%	0,00%	0,00%	0,00%	0,00%	
	Rasio Pendanaan Stabil Bersih (NSFR) ***						
18	Total Pendanaan Stabil yang Tersedia (ASF)	0,00	0,00	0,00	0,00	0,00	
19	Total Pendanaan Stabil yang Diperlukan (RSF)	0,00	0,00	0,00	0,00	0,00	
20	NSFR (%)	0,00%	0,00%	0,00%	0,00%	0,00%	

Analisis Kualitatif
Qualitative Analysis

1. Capital Adequency Ratio (CAR) pada 31 Desember 2023 adalah sebesar 19.95%, turun 0.81% dari posisi 30 September 2023. Penurunan ini disebabkan adanya penurunan laba tahun berjalan yang terjadi bulan desember tahun 2023. Rasio Total Modal berada di atas ketentuan regulator yaitu paling rendah sebesar 8%.
2. Leverage Ratio pada 31 Desember 2023 adalah sebesar 10.34% atau berada diatas ketentuan Otoritas Jasa Keuangan (OJK) yaitu paling rendah sebesar 3% sebagaimana yang diwajibkan di POJK No. 31/POJK.03./2019.
3. Bank belum melakukan perhitungan LCR dan NSFR sesuai POJK No. 4/POJK.03/2015 dan POJK No. 50/POJK.03/2017."

* Pengungkapan kuantitatif sesuai Peraturan Otoritas Jasa Keuangan No. 31/POJK.03/2019
** Pengungkapan kuantitatif sesuai Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015
*** Pengungkapan kuantitatif sesuai Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017

Tabel Perbedaan antara Cakupan Konsolidasi dan Mapping pada Laporan Keuangan sesuai Standar Akuntansi Keuangan dengan Kategori Risiko sesuai dengan Ketentuan Otoritas Jasa Keuangan Kategori Risiko (LI1) Tabel Utama (*Key metrics*) - Bank secara individual

Table of Difference between Consolidated and Mapping Coverage on the Financial Statements in Accordance with the Financial Accounting Standards with Risk Categories in Accordance with the Financial Services Authority Provisions for Risk Category (LI1)

(dalam jutaan rupiah / in million Rupiah)

Deskripsi	Nilai tercatat sebagaimana tercantum dalam publikasi laporan keuangan	Nilai tercatat berdasarkan prinsip kehati-hatian	Nilai tercatat masing-masing risiko					Description
			Sesuai kerangka risiko kredit	Sesuai kerangka *counterparty credit risk*	Sesuai kerangka sekuritisasi	Sesuai kerangka risiko pasar	Tidak mengacu pada persyaratan permodalan atau berdasarkan pengurangan modal	
ASET								
Kas	92.821	92.821	92.821	-	-	-	-	
Penempatan pada Bank Indonesia	1.853.024	1.853.024	1.853.024	-	-	-	-	
Penempatan Pada Bank lain	852.719	852.719	852.719	-	-	-	-	
Tagihan spot dan derivatif/forward	203	203	-	-	-	-	203	
Surat Berharga yang Dimiliki	6.285.564	6.285.564	5.264.525	-	8.508	1.012.530	1	
Surat berharga yang dijual dengan janji dibeli kembali (repo)	-	-	-	-	-	-	-	
Tagihan atas Surat Berharga yang dibeli dengan janji dijual kembali (Reverse Repo)	636.733	636.733	-	-	-	-	636.733	
Tagihan Akseptasi	12.475	12.475	12.475	-	-	-	-	
Kredit yang diberikan	18.628.743	18.628.743	18.628.743	-	-	-	-	
Pembiayaan Syariah	-	-	-	-	-	-	-	
Penyertaan modal	215.931	215.931	215.931	-	-	-	-	
Aset keuangan lainnya	368.408	368.408	365.356	-	-	-	3.052	
Cadangan Kerugian Penurunan Nilai Aset Keuangan -/-								
a. Surat berharga yang dimiliki	(8.272)	(8.272)	-	-	-	-	(8.272)	
b. Kredit yang diberikan dan pembiayaan syariah	(574.872)	(574.872)	(462.066)	-	-	-	(112.806)	

Deskripsi	Nilai tercatat sebagaimana tercantum dalam publikasi laporan keuangan	Nilai tercatat berdasarkan prinsip kehati-hatian	Nilai tercatat masing-masing risiko					Description
			Sesuai kerangka risiko kredit	Sesuai kerangka *counterparty credit risk*	Sesuai kerangka sekuritisasi	Sesuai kerangka risiko pasar	Tidak mengacu pada persyaratan permodalan atau berdasarkan pengurangan modal	
c. Lainnya	(1.001)	(1.001)	-	-	-	-	(1.001)	
Aset Tidak Berwujud	23.819	23.819	-	-	-	-	23.819	
Akumulasi Amortisasi Aset Tidak Berwujud -/-	(15.627)	(15.627)	-	-	-	-	(15.627)	
Aset Tetap dan Inventaris	505.087	505.087	423.227	-	-	-	81.860	
Akumulasi Penyusutan Aktiva Tetap dan Inventaris -/-	(81.859)	(81.859)	-	-	-	-	(81.859)	
Aset Non Produktif								
a. Properti terbengkalai	33.795	33.795	-	-	-	-	33.795	
b. Agunan yang diambil alih	550.616	550.616	550.616	-	-	-	-	
c. Rekening tunda	3.495	3.495	-	-	-	-	3.495	
d. Aset antarkantor	-	-	-	-	-	-	-	
Aset Lainnya	242.439	242.439	116.725	-	-	-	125.714	
Total aset	29.624.241	29.624.241	27.914.096	-	8.508	1.012.530	689.107	

Deskripsi	Nilai tercatat sebagaimana tercantum dalam publikasi laporan keuangan	Nilai tercatat berdasarkan prinsip kehati-hatian	Nilai tercatat masing-masing risiko					Description
			Sesuai kerangka risiko kredit	Sesuai kerangka *counterparty credit risk*	Sesuai kerangka sekuritisasi	Sesuai kerangka risiko pasar	Tidak mengacu pada persyaratan permodalan atau berdasarkan pengurangan modal	
LIABILITAS DAN EKUITAS								
LIABILITAS								
Giro	2.484.506	2.484.506	-	-	-	-	1.327.022	
Tabungan	2.881.781	2.881.781	-	-	-	-	3.158.543	
Deposito	17.062.893	17.062.893	-	-	-	-	14.821.300	
Uang Elektronik	-	-	-	-	-	-	-	
Liabilitas kepada Bank Indonesia	-	-	-	-	-	-	-	
Liabilitas kepada bank lain	1.104.803	1.104.803	-	-	-	-	1.045.673	
Liabilitas spot dan derivatif/ forward	74	74	-	-	-	-	21	
Liabilitas atas surat berharga yang dijual dengan janji dibeli kembali (repo)	643.267	643.267	-	-	-	-	-	
Liabilitas akseptasi	11.960	11.960	-	-	-	-	-	
Surat berharga yang diterbitkan	1.347.640	1.347.640	-	-	-	-	498.308	
Pinjaman/Pembiayaan yang diterima	-	-	-	-	-	-	900.212	
Setoran jaminan	761	761	-	-	-	-	-	
Liabilitas antar kantor	-	-	-	-	-	-	-	
Liabilitas lainnya	261.770	261.770	-	-	-	-	181.640	
Kepentingan minoritas (minority interest)	-	-	-	-	-	-	17	
Total liabilitas	25.799.455	25.799.455	-	-	-	-	25.799.455	
EKUITAS								

Deskripsi	Nilai tercatat sebagaimana tercantum dalam publikasi laporan keuangan	Nilai tercatat berdasarkan prinsip kehati-hatian	Nilai tercatat masing-masing risiko					Description
			Sesuai kerangka risiko kredit	Sesuai kerangka *counterparty credit risk*	Sesuai kerangka sekuritisasi	Sesuai kerangka risiko pasar	Tidak mengacu pada persyaratan permodalan atau berdasarkan pengurangan modal	
Modal disetor								
a. Modal dasar	4.100.000	4.100.000	-	-	-	-	4.100.000	
b. Modal yang belum disetor -/-	(2.515.176)	(2.515.176)	-	-	-	-	(2.515.176)	
c. Saham yang dibeli kembali (treasury stock) -/-	-	-	-	-	-	-	-	
Tambahan modal disetor								
a. Agio	668.685	668.685	-	-	-	-	668.685	
b. Disagio -/-	-	-	-	-	-	-	-	
c. Dana setoran modal	-	-	-	-	-	-	-	
d. Lainnya	-	-	-	-	-	-	-	
Penghasilan komprehensif lain								
a. Keuntungan	385.091	385.091	-	-	-	-	385.091	
b. Kerugian -/-	-	-	-	-	-	-	-	
Cadangan								
a. Cadangan umum	202.200	202.200	-	-	-	-	202.200	
b. Cadangan tujuan	-	-	-	-	-	-	-	
Laba/rugi								
a. Tahun-tahun lalu	882.170	882.170	-	-	-	-	882.170	
b. Tahun berjalan	101.816	101.816	-	-	-	-	101.816	
c. Dividen yang dibayarkan -/- Total Ekuitas Yang Dapat Diatrebusikan Kepada Pemilik	-	-	-	-	-	-	-	
Total Ekuitas	3.824.786	3.824.786	-	-	-	-	3.824.786	
Total liabilitas dan Ekuitas	29.624.241	29.624.241	-	-	-	-	29.624.241	

Tabel Perbedaan Utama antara Nilai Tercatat sesuai Standar Akuntansi Keuangan dengan Nilai Eksposur sesuai dengan Ketentuan OJK (LI2)

Table of Key Differences between Carrying Value in Accordance with the Financial Accounting Standards and Exposure Value in Accordance with the Financial Services Authority Regulations (LI2)

(dalam jutaan rupiah / in million Rupiah)

Deskripsi	Total	Kerangka risiko kredit	Kerangka sekuritisasi	Kerangka Counterparty credit risk	Kerangka risiko pasar
Nilai tercatat aset sesuai dengan cakupan konsolidasi ketentuan kehati-hatian (sebagaimana dilaporkan pada tabel LI1)	29.624.241	27.914.096	8.508	0	1.012.530
Nilai tercatat liabilitas sesuai lingkup sesuai dengan cakupan konsolidasi ketentuan kehati-hatian (sebagaimana dilaporkan pada tabel LI1)	25.799.455	-	-	-	-
Total nilai bersih sesuai dengan cakupan konsolidasi ketentuan kehati-hatian	3.824.786	27.914.096	8.508	0	1.012.530
Nilai rekening administratif	6.333.608	6.333.608	-	-	-
Perbedaan valuasi	-	-	-	-	-
Perbedaan antara netting rules, selain dari yang termasuk pada baris 2.	-	-	-	-	-
Perbedaan provisi	-	-	-	-	-
Perbedaan prudential filters	-	-	-	-	-
Nilai eksposur yang dipertimbangkan, sesuai dengan cakupan konsolidasi ketentuan kehati-hatian	-	-	-	-	-
Tabel Penjelasan mengenai perbedaan antara nilai eksposur sesuai Standar Akuntansi Keuangan dengan Ketentuan OJK (LIA)					
Tidak terdapat perbedaan antara nilai tercatat sesuai standar akuntansi keuangan, sebagaimana dilaporkan pada laporan keuangan dan nilai eksposur sesuai ketentuan kehati-hatian					

Tabel Komposisi Permodalan (CC1) - Bank secara individual
Table of Capital Composition (CC1) – Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No	Deskripsi	31 Desember 2023 31 December 2023
	Modal Inti Utama (Common Equity Tier I)/CET 1: Instrumen dan Tambahan Modal Disetor	
1	Saham biasa (termasuk *stock* surplus)	2.253.508
2	Laba ditahan	983.986
3	Akumulasi penghasilan komprehensif lain (dan cadangan lain)	601.488
4	Modal yang termasuk *phase out* dari CET1	N/A
5	Kepentingan Non Pengendali yang dapat diperhitungkan	-
6	CET1 sebelum *regulatory adjustment*	3.287.238
	CET 1: Faktor Pengurang (Regulatory Adjustment)	
7	Selisih kurang jumlah penyesuaian nilai wajar dari instrumen keuangan dalam *trading book*	-
8	*Goodwill*	-
9	Aset tidak berwujud lainnya (selain *Mortgage-Servicing Rights*)	(8.193)
10	Aset pajak tangguhan yang berasal dari *future profitability*	N/A
11	*Cash-flow hedge reserve*	N/A
12	*Shortfall on provisions to expected losses*	N/A
13	Keuntungan penjualan aset dalam transaksi sekuritisasi	-
14	Peningkatan/ penurunan nilai wajar atas kewajiban keuangan (DVA)	-
15	Aset pensiun manfaat pasti	N/A
16	Investasi pada saham sendiri (jika belum di net dalam modal di Laporan Posisi Keuangan)	N/A
17	Kepemilikan silang pada instrumen CET 1 pada entitas lain	-
18	Investasi pada modal bank, entitas keuangan dan asuransi diluar cakupan konsolidasi secara ketentuan, net posisi short yang diperkenankan, dimana Bank tidak memiliki lebih dari 10% modal saham yang diterbitkan (jumlah di atas batasan 10%)	N/A
19	Investasi signifikan pada saham biasa Bank, entitas keuangan dan asuransi diluar cakupan konsolidasi secara ketentuan, net posisi short yang diperkenankan (jumlah di atas batasan 10%)	N/A
20	*Mortgage servicing rights*	-
21	Aset pajak tangguhan yang berasal dari perbedaan temporer (jumlah di atas batasan 10%, net dari kewajiban pajak)	N/A
22	Jumlah melebihi batasan 15% dari:	N/A
23	Investasi signifikan pada saham biasa *financials*	N/A

No	Deskripsi	31 Desember 2023 31 December 2023
24	*Mortgage servicing rights*	N/A
25	Pajak tangguhan dari perbedaan temporer	N/A
26	Penyesuaian berdasarkan ketentuan spesifik nasional	
26a.	Selisih PPKA dan CKPN	-
26b.	PPKA non produktif	(346.883)
26c.	Aset Pajak Tangguhan	(163.004)
26d.	Penyertaan	-
26e.	Kekurangan modal pada perusahaan anak asuransi	N/A
26f.	Eksposur sekuritisasi	-
26g.	Lainnya	-
27	Penyesuaian pada CET 1 akibat AT 1 dan Tier 2 lebih kecil daripada faktor pengurangnya	-
28	**Jumlah pengurang (regulatory adjustment) terhadap CET 1**	(518.080)
29	**Jumlah CET 1 setelah faktor pengurang**	2.769.158
	Modal Inti Tambahan (AT 1): Instrumen	
30	Instrumen AT 1 yang diterbitkan oleh Bank (termasuk stock surplus)	-
31	Yang diklasifikasikan sebagai ekuitas berdasarkan standar akuntansi	-
32	Yang diklasifikasikan sebagai liabilitas berdasarkan standar akuntansi	-
33	Modal yang termasuk *phase out* dari AT 1	N/A
34	Instrumen AT 1 yang diterbitkan oleh Entitas Anak yang diakui dalam perhitungan KPMM secara konsolidasi	-
35	Instrumen yang diterbitkan Entitas Anak yang termasuk phase out	N/A
36	**Jumlah AT 1 sebelum *regulatory adjustment***	-
	Modal Inti Tambahan: Faktor Pengurang (Regulatory Adjustment)	
37	Investasi pada instrumen AT 1 sendiri	N/A
38	Kepemilikan silang pada instrumen AT 1 pada entitas lain	-
39	Investasi pada modal bank, entitas keuangan dan asuransi diluar cakupan konsolidasi secara ketentuan, net posisi short yang diperkenankan, dimana Bank tidak memiliki lebih dari 10% modal saham yang diterbitkan (jumlah di atas batasan 10%)	N/A
40	Investasi signifikan pada modal Bank, entitas keuangan dan asuransi di luar cakupan konsolidasi secara ketentuan (net posisi short yang diperkenankan)	N/A
41	Penyesuaian berdasarkan ketentuan spesifik nasional	

No	Deskripsi	31 Desember 2023 31 December 2023
41a.	Penempatan dana pada instrumen AT 1 pada Bank lain	-
42	Penyesuaian pada AT 1 akibat Tier 2 lebih kecil daripada faktor pengurangnya	-
43	**Jumlah faktor pengurang (*regulatory adjustment*) terhadap AT 1**	-
44	**Jumlah AT 1 setelah faktor pengurang**	-
45	**Jumlah Modal Inti (*Tier* 1) (CET 1 + AT 1)**	2.769.158
	Modal Pelengkap (Tier 2): Instrumen dan cadangan	
46	Instrumen Tier 2 yang diterbitkan oleh Bank (termasuk *stock surplus*)	337.500
47	Modal yang yang termasuk phase out dari *Tier* 2	N/A
48	Instrumen Tier 2 yang diterbitkan oleh Entitas Anak yang diakui dalam perhitungan KPMM secara konsolidasi	-
49	Modal yang diterbitkan Entitas Anak yang termasuk phase out	N/A
50	Cadangan umum PPKA atas aset produktif yang wajib dihitung dengan jumlah paling tinggi sebesar 1,25% dari ATMR untuk Risiko Kredit	195.353
51	**Jumlah Modal Pelengkap (*Tier 2)* sebelum faktor pengurang**	532.853
	Modal Pelengkap (Tier 2): Faktor Pengurang (Regulatory Adjustment)	
52	Investasi pada instrumen *Tier* 2 sendiri	N/A
53	Kepemilikan silang pada instrumen *Tier* 2 pada entitas lain	N/A
54	Investasi pada kewajiban TLAC modal bank, entitas keuangan dan asuransi diluar cakupan konsolidasi secara ketentuan, *net* posisi *short* yang diperkenankan, di mana Bank tidak memiliki lebih dari 10% modal saham yang diterbitkan; nilai sebelumnya ditetapkan dengan threshold 5% namun tidak lagi memenuhi kriteria (untuk bank Sistemik)	N/A
55	Investasi signifikan pada modal atau instrumen TLAC Bank, entitas keuangan dan asuransi di luar cakupan konsolidasi secara ketentuan (*net* posisi *short* yang diperkenankan)	N/A
56	Penyesuaian berdasarkan ketentuan spesifik nasional	
56a.	*Sinking fund*	-
56b.	Penempatan dana pada instrumen Tier 2 pada Bank lain	-
57	Jumlah faktor pengurang (regulatory adjustment) Modal Pelengkap	-
58	**Jumlah Modal Pelengkap (Tier 2) setelah *regulatory adjustment***	532.853
59	**Total Modal (Modal Inti + Modal Pelengkap)**	3.302.011
60	**Total Aset Tertimbang Menurut Risiko (ATMR)**	19.150.900
	Rasio Kecukupan Pemenuhan Modal Minimum (KPMM) dan Tambahan Modal (Capital Buffer)	
61	**Rasio CET 1 (persentase terhadap ATMR)**	17,16%
62	**Rasio Modal Inti Tier 1 (persentase terhadap ATMR)**	17,16%

No	Deskripsi	31 Desember 2023 31 December 2023
63	**Rasio Total Modal (persentase terhadap ATMR)**	**19,95%**
64	***Buffer* (persentase terhadap ATMR)**	**N/A**
65	*Capital Conservation Buffer*	**N/A**
66	*Countercyclical Buffer*	**N/A**
67	*higher loss absorbency requirement*	**N/A**
68	Untuk bank umum konvensional: CET 1 yang tersedia untuk memenuhi *Buffer* (persentase terhadap ATMR) Untuk kantor cabang dari Bank yang berkedudukan di luar negeri: Bagian Dana Usaha yang ditempatkan dalam CEMA (diungkapkan sebagai persentase dari ATMR) yang tersedia untuk memenuhi *Buffer*.	-
	***National minima* (jika berbeda dari Basel 3)**	
69	Rasio terendah CET 1 nasional (jika berbeda dengan Basel 3)	**N/A**
70	Rasio terendah Tier 1 nasional (jika berbeda dengan Basel 3)	**N/A**
71	Rasio terendah total modal nasional (jika berbeda dengan Basel 3)	**N/A**
	Jumlah di bawah batasan pengurangan (sebelum pembobotan risiko)	
72	Investasi non-signifikan pada modal atau kewajiban TLAC lainnya pada entitas keuangan lain	**N/A**
73	Investasi signifikan pada saham biasa entitas keuangan	**N/A**
74	*Mortgage servicing rights* (net dari kewajiban pajak)	**N/A**
75	Aset pajak tangguhan yang berasal dari perbedaan temporer (net dari kewajiban pajak)	**N/A**
	Cap yang dikenakan untuk provisi pada Tier 2	
76	Provisi yang dapat diakui sebagai *Tier* 2 sesuai dengan eksposur berdasarkan pendekatan standar (sebelum dikenakan cap)	**N/A**
77	Cap atas provisi yang diakui sebagai *Tier* 2 berdasarkan pendekatan standar	**N/A**
78	Provisi yang dapat diakui sebagai *Tier* 2 sesuai dengan eksposur berdasarkan pendekatan IRB (sebelum dikenakan cap)	**N/A**
79	Cap atas provisi yang diakui sebagai *Tier* 2 berdasarkan pendekatan IRB	**N/A**
	Instrumen Modal yang termasuk phase out (hanya berlaku antara 1 Jan 2018 s.d. 1 Jan 2022)	
80	Cap pada CET 1 yang temasuk phase out	**N/A**
81	Jumlah yang dikecualikan dari CET 1 karena adanya cap (kelebihan di atas cap setelah redemptions dan maturities)	**N/A**
82	Cap pada AT 1 yang temasuk phase out	**N/A**
83	Jumlah yang dikecualikan dari AT 1 karena adanya cap (kelebihan di atas cap setelah redemptions dan maturities)	**N/A**
84	Cap pada Tier 2 yang temasuk phase out	**N/A**
85	Jumlah yang dikecualikan dari Tier 2 karena adanya cap (kelebihan di atas cap setelah redemptions dan maturities)	**N/A**

Analisis Kualitatif
Qualitative Analysis

Capital Adequency Ratio (CAR) pada 31 Desember 2023 adalah sebesar 19.95% atau berada di atas ketentuan regulator yaitu paling rendah sebesar 8%.

Tabel Laporan Kewajiban Pemenuhan Rasio Pengungkit - Bank secara individual

(dalam jutaan rupiah / in million Rupiah)

No	Keterangan	31 Desember 2023 31 December 2023
1	Total aset di neraca pada laporan keuangan publikasi (nilai gross sebelum dikurangi CKPN).	28,600,244
2	Penyesuaian untuk nilai penyertaan pada bank, lembaga keuangan, perusahaan asuransi, dan/atau entitas lain yang berdasarkan standar akuntansi keuangan harus dikonsolidasikan namun diluar cakupan konsolidasi berdasarkan ketentuan Otoritas Jasa Keuangan.	-
3	"Penyesuaian untuk nilai kumpulan aset keuangan atau aset syariah yang mendasari (*underlying*) yang telah dialihkan dalam sekuritisasi aset yang memenuhi persyaratan jual putus sebagaimana diatur dalam peraturan perundang-undangan OJK mengenai Prinsip Kehati-hatian dalam Aktivitas Sekuritisasi Aset bagi Bank Umum."	-
4	Penyesuaian terhadap pengecualian sementara atas penempatan giro pada Bank Indonesia dalam rangka memenuhi ketentuan giro wajib minimum (jika ada).	N/A
5	Penyesuaian untuk aset fidusia yang diakui sebagai komponen neraca berdasarkan standar akuntansi keuangan namun dikeluarkan dari perhitungan total eksposur dalam Rasio *Leverage*.	N/A
6	Penyesuaian untuk nilai pembelian atau penjualan aset keuangan secara regular dengan menggunakan metode akuntansi tanggal perdagangan.	-
7	Penyesuaian untuk nilai transaksi dalam fasilitas *cash pooling* yang memenuhi persyaratan sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan ini.	-
8	Penyesuaian untuk nilai eksposur transaksi derivatif.	792
9	Penyesuaian untuk nilai eksposur *Securitities Financing Transaction* (SFT) sebagai contoh transaksi reverse repo.	636,733
10	Penyesuaian untuk nilai eksposur Transaksi Rekening Administratif (TRA) yang telah dikalikan dengan Faktor Konversi Kredit (FKK).	2,539,271
11	*Prudent valuation adjustments* berupa faktor pengurang modal dan Cadangan Kerugian Penurunan Nilai (CKPN)	-
12	Penyesuaian lainnya (jika ada)	-
13	**Total Eksposur dalam Perhitungan Rasio *Leverage***	31,777,041

Tabel Laporan Perhitungan Rasio Pengungkit - Bank secara individual

(dalam jutaan rupiah / in million Rupiah)

No	Keterangan	31 Desember 2023 31 December 2023
1	Eksposur Aset dalam Laporan Posisi Keuangan (Neraca) termasuk aset jaminan yang tercatat dalam neraca, namun tidak termasuk eksposur transaksi derivatif dan eksposur SFT. (Nilai gross sebelum dikurangi CKPN)	29,554,906
2	Nilai penambahan kembali untuk agunan derivatif yang diserahkan kepada pihak lawan dan penyediaan agunan tersebut mengakibatkan penurunan total eksposur aset dalam neraca karena adanya penerapan standar akuntansi.	
3	(Pengurangan atas piutang terkait cash variation margin yang diberikan dalam transaksi derivatif).	-
4	(Penyesuaian untuk surat berharga yang diterima dalam eksposur SFT yang telah dicatat sebagai aset dalam neraca Bank).	-
5	(Cadangan Kerugian Penurunan Nilai (CKPN) atas aset tersebut sesuai standar akuntansi yang berlaku).	(567,601)
6	(Aset yang telah diperhitungkan sebagai faktor pengurang Modal Inti (tier 1) sebagaimana dimaksud dalam Peraturan Otoritas Jasa Keuangan yang mengatur mengenai kewajiban penyediaan modal minimum bank umum).	(387,061)
7	**Total Eksposur Aset dalam Laporan Posisi Keuangan (Neraca) (Penjumlahan dari baris 1 sampai dengan baris 6)**	28,600,244
Eksposur Transaksi Derivatif		
8	*Nilai Replacement Cost* (RC) untuk seluruh transaksi derivatif baik dalam hal terdapat *variation margin* yang memenuhi syarat ataupun terdapat perjanjian saling hapus yang memenuhi persyaratan tertentu.	
9	Nilai penambahan yang merupakan *Potential Futures Exposures* (PFE) untuk seluruh transaksi derivatif.	
10	(pengecualian atas eksposur transaksi derivatif yang diselesaikan melalui central clearing counterparty (CCP))	
11	Penyesuaian untuk nilai nosional efektif dari derivatif kredit	
12	(Penyesuaian untuk nilai nosional efektif yang dilakukan saling hapus dan pengurangan *add-on* untuk transaksi penjualan kredit derivatif)	
13	**"Total Eksposur Transaksi Derivatif (Penjumlahan baris 8 sampai dengan baris 12)"**	
***Eksposur Securities Financing Transaction* (SFT)**		
14	Nilai Gross SFT	636,733
15	(Nilai bersih antara liabilitas kas dan tagihan kas)	
16	Risiko Kredit akibat kegagalan pihak lawan terkait aset SFT yang mengacu perhitungan Current Exposure sebagaimana diatur dalam Lampiran I Peraturan Otoritas Jasa Keuangan ini.	-
17	Eksposur sebagai agen SFT	
18	**"Total Eksposur SFT (Penjumlahan baris 14 sampai dengan baris 17)"**	636,733

No	Keterangan	31 Desember 2023 31 December 2023
Eksposur Transaksi Rekening Administratif (TRA)		
19	"Nilai seluruh kewajiban komitmen atau kewajiban kontijensi. *Nilai gross sebelum dikurangi CKPN"	6,347,775
20	(Penyesuaian terhadap hasil perkalian antara nilai kewajiban komitmen atau kewajiban kontijensi dan Faktor Konversi Kredit (FKK))	(3,808,504)
21	(Cadangan Kerugian Penurunan Nilai (CKPN) atas TRA tersebut sesuai standar akuntansi yang berlaku).	-
22	**"Total Eksposur Transaksi Rekening Administratif (TRA) (Penjumlahan dari baris 19 sampai dengan baris 21)"**	2,539,271
Modal dan Total Ekposur		
23	Modal Inti (*Tier* 1)	3,287,239
24	Total Eksposur (Penjumlahan baris 7, 13, 18, dan 22)	31,777,040
Rasio *Leverage*		
25	Nilai Rasio Leverage (Kolom 23 ÷ Kolom 24)	10.34%
26	**Nilai Minimum Rasio *Leverage***	3%
27	***Buffer* terhadap nilai Rasio *Leverage***	N/A
Pengungkapan Nilai Rata - Rata		
28	Nilai rata-rata dari nilai tercatat aset SFT secara gross, setelah penyesuaian untuk transaksi akuntansi penjualan (sale accounting transaction) yang dihitung secara bersih (nett) dengan liabilitas kas dalam SFT dan tagihan kas dalam SFT	(6,534)
29	Nilai akhir triwulan laporan dari nilai tercatat aset SFT secara gross, setelah penyesuaian untuk transaksi akuntansi penjualan (sale accounting transaction) yang dihitung secara bersih (nett) dengan liabilitas kas dalam SFT dan tagihan kas dalam SFT	(6,534)
30	Total Eksposur, termasuk dampak dari penyesuaian terhadap pengecualian sementara atas penempatan giro pada Bank Indonesia dalam rangka memenuhi ketentuan giro wajib minimum (jika ada), yang telah memasukkan nilai rata-rata dari nilai tercatat aset SFT secara gross sebagaimana dimaksud dalam baris 28	30,309,448
30a	Total Eksposur, tidak termasuk dampak dari penyesuaian terhadap pengecualian sementara atas penempatan giro pada Bank Indonesia dalam rangka memenuhi ketentuan giro wajib minimum (jika ada), yang telah memasukkan nilai rata-rata dari nilai tercatat aset SFT secara gross sebagaimana dimaksud dalam baris 28	31,777,040
31	Nilai Rasio Pengungkit, termasuk dampak dari penyesuaian terhadap pengecualian sementara atas penempatan giro pada Bank Indonesia dalam rangka memenuhi ketentuan giro wajib minimum (jika ada), yang telah memasukkan nilai rata-rata dari nilai tercatat aset SFT secara gross sebagaimana dimaksud dalam baris 28	10.85%
31a	Nilai Rasio Pengungkit, tidak termasuk dampak dari penyesuaian terhadap pengecualian sementara atas penempatan giro pada Bank Indonesia dalam rangka memenuhi ketentuan giro wajib minimum (jika ada), yang telah memasukkan nilai rata-rata dari nilai tercatat aset SFT secara gross sebagaimana dimaksud dalam baris 28	10.34%

No	Keterangan	31 Desember 2023 31 December 2023
Analisis Kualitatif		
	Rasio pengungkit pada 31 Desember 2023 adalah sebesar 10.34% atau berada diatas ketentuan Otoritas Jasa Keuangan (OJK) yaitu paling rendah sebesar 3% sebagaimana yang diwajibkan di POJK No. 31/POJK.03./2019.	

Tabel Laporan Kewajiban Pemenuhan Rasio Pengungkit - Bank secara individual

(dalam jutaan rupiah / in million Rupiah)

No	Keterangan	31 Desember 2023 31 December 2023
1	Total aset di neraca pada laporan keuangan publikasi (nilai gross sebelum dikurangi CKPN).	28,600,244
2	Penyesuaian untuk nilai penyertaan pada bank, lembaga keuangan, perusahaan asuransi, dan/atau entitas lain yang berdasarkan standar akuntansi keuangan harus dikonsolidasikan namun diluar cakupan konsolidasi berdasarkan ketentuan Otoritas Jasa Keuangan.	-
3	"Penyesuaian untuk nilai kumpulan aset keuangan atau aset syariah yang mendasari (*underlying*) yang telah dialihkan dalam sekuritisasi aset yang memenuhi persyaratan jual putus sebagaimana diatur dalam peraturan perundang-undangan OJK mengenai Prinsip Kehati-hatian dalam Aktivitas Sekuritisasi Aset bagi Bank Umum."	-
4	Penyesuaian terhadap pengecualian sementara atas penempatan giro pada Bank Indonesia dalam rangka memenuhi ketentuan giro wajib minimum (jika ada).	N/A
5	Penyesuaian untuk aset fidusia yang diakui sebagai komponen neraca berdasarkan standar akuntansi keuangan namun dikeluarkan dari perhitungan total eksposur dalam Rasio *Leverage*.	N/A
6	Penyesuaian untuk nilai pembelian atau penjualan aset keuangan secara regular dengan menggunakan metode akuntansi tanggal perdagangan.	-
7	Penyesuaian untuk nilai transaksi dalam fasilitas *cash pooling* yang memenuhi persyaratan sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan ini.	-
8	Penyesuaian untuk nilai eksposur transaksi derivatif.	792
9	Penyesuaian untuk nilai eksposur *Securitities Financing Transaction* (SFT) sebagai contoh transaksi reverse repo.	636,733
10	Penyesuaian untuk nilai eksposur Transaksi Rekening Administratif (TRA) yang telah dikalikan dengan Faktor Konversi Kredit (FKK).	2,539,271
11	*Prudent valuation adjustments* berupa faktor pengurang modal dan Cadangan Kerugian Penurunan Nilai (CKPN)	-
12	Penyesuaian lainnya (jika ada)	-
13	**Total Eksposur dalam Perhitungan Rasio *Leverage***	31,777,041

Pengungkapan Kualitas Kredit atas Aset (CR1)
Disclosure of Credit Quality over Asset (CR1)

(dalam jutaan rupiah / in million Rupiah)

1) Bank secara Individu / Bank Individually

No	Deskripsi	Nilai Tercatat Bruto Gross Carrying Amount		CKPN	CKPN		CKPN (Pendekatan IRB) CKPN (IRB Approach)	Nilai Bersih (a+b-c) Net Value (a+b-c)	Description
		Tagihan yang Telah Jatuh Tempo Due Receivables	Tagihan yang Belum Jatuh Tempo Not Due Receivables		Stage 2 dan Stage 3 Stage 2 and Stage 3	Stage 1			
		a	b	c	d	e	f	g	
1.	Kredit	714,087	18,211,172	574,872	462,066	112,806		18,350,386	Credit
2.	Surat Berharga	-	6,285,564	8,272	-	8,272		6,277,292	Marketable Securities
3.	Transaksi Rekening Administratif	-	1,043,367	-	-	-		1,043,367	Administrative Account Transaction
4.	**Total**	714,087	25,540,102	583,144	462,066	121,078		25,671,045	**Total**

2) Pengungkapan Tambahan / Additional Disclosure

1. Tagihan yang Telah Jatuh Tempo merupakan tagihan debitur dengan kolektibilitas 3, 4, dan 5 atau dengan tunggakan lebih dari 90 hari.
2. Bank tidak memiliki eksposur kualitas kredit atas aset secara konsolidasi karena berdasarkan Surat OJK No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk. dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk

1. Due Receivables are debtor receivables with collectibility 3, 4, and 5 or with arrears of more than 90 days.
2. The Bank does not have credit quality exposure on assets on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk

Pengungkapan Mutasi Kredit dan Surat Berharga yang Telah Jatuh Tempo (CR2)
Disclosure of Changes in Due Loans and Securities (CR2)

1) Bank secara Individu / Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No	Deskripsi	a	Description
1.	Kredit dan Surat Berharga yang Telah Jatuh Tempo pada periode pelaporan terakhir	668,627	Due Loans and Securities on last reporting period
2.	Kredit dan Surat Berharga yang Telah Jatuh Tempo sejak periode pelaporan terakhir	387,036	Due Loans and Securities since last reporting period
3.	Kredit dan Surat Berharga yang kembali menjadi tagihan yang belum jatuh tempo	58,526	Not Due Loans and Securities that return to receivables
4.	Nilai hapus buku	193,922	Write-off value
5.	Perubahan lain	(89,128)	Other changes
6.	Kredit dan Surat Berharga yang Telah Jatuh Tempo pada akhir periode pelaporan (1+2-3-4+5)	714,087	Due Loans and Securities on last reporting period (1+2-3-4+5)

2) Pengungkapan Tambahan / Additional Disclosure

1. Bank tidak memiliki eksposur mutasi kredit dan surat berharga yang telah jatuh tempo secara konsolidasi karena berdasarkan Surat OJK No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk. dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk

1. The Bank does not have exposure to changes in due loans and securities on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk

Tabel Pengungkapan Tagihan Bersih Berdasarkan Wilayah - Bank secara Individual

Table of Disclosure of Net Receivables by Area – Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2023 / 31 December 2023					Portfolio Category
		Tagihan Bersih Berdasarkan Wilayah / Net Receivables by Region					
		Zona Indonesia Barat (Wilayah 1) / Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) / Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) / Indonesia Zone East (Zone 3)	Diluar Indonesia (Wilayah 4) / Indonesia Outside (Zone 4)	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(2)
1.	Tagihan Kepada Pemerintah	6,111,398	-	-	-	6,111,398	Receivables from Government
2.	Tagihan Kepada Entitas Sektor Publik	958,467	-	-	-	958,467	"Receivables from Public Sector Entities"
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional	53,157	-	-	-	53,157	"Receivables from Multilateral Development Banks and International Institutions"
4.	Tagihan Kepada Bank	2,182,723	-	106,469	66	2,289,258	Receivables from Banks
5.	Tagihan berupa Covered Bond	-	-	-	-	-	Receivables in the form of Covered Bond
6.	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	3,564,372	-	-	-	3,564,372	Receivables from Securities Companies and Other Financial Services Institutions
7.	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	215,931	-	-	-	215,931	Receivables in the form of Subordinated Securities/Receivables, Equity and Other Capital Instruments
8.	Kredit Beragunan Rumah Tinggal	146,380	4,488	-	-	150,868	"Residential Property Collateralized Loans"
9.	Kredit Beragunan Properti Komersial	3,119,832	30,157	-	-	3,149,989	"Commercial Property Collateralized Loans"
10.	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	Loan by Land Acquisition, Land Processing, and Construction
11.	Kredit Pegawai/Pensiunan	-	-	-	-	-	Employee/Retirement Loans

No.	Kategori Portofolio	31 Desember 2023 31 December 2023 Tagihan Bersih Berdasarkan Wilayah Net Receivables by Region					Portfolio Category
		Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Diluar Indonesia (Wilayah 4) Indonesia Outside (Zone 4)	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(2)
12.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	2,450,260	257,540	9,601	-	2,717,400	"Receivables from Microbusiness, Small Business, and Retail Portfolio"
13.	Tagihan kepada Korporasi	9,270,754	772,052	61,554	-	10,104,360	Receivables from Corporations
14.	Tagihan yang Telah Jatuh Tempo	546,949	38,771	-	-	585,719	Due Receivables
15.	Aset Lainnya	1,183,389	-	-	-	1,183,389	Other Assets
	Total	29,803,611	1,103,007	177,624	66	31,084,309	Total

(dalam jutaan rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2022 31 Desember 2022 Tagihan Bersih Berdasarkan Wilayah Net Receivables by Region					Portfolio Category
		Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Diluar Indonesia (Wilayah 4) Indonesia Outside (Zone 4)	Total	
(1)	(2)	(8)	(9)	(10)	(11)	(12)	(2)
1.	Tagihan Kepada Pemerintah	6,862,645	-	-	-	6,862,645	Receivables from Government
2.	Tagihan Kepada Entitas Sektor Publik	1,569,136	-	-	-	1,569,136	"Receivables from Public Sector Entities"
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional	18,091	-	-	-	18,091	"Receivables from Multilateral Development Banks and International Institutions"
4.	Tagihan Kepada Bank	671,038	1,001	-	109,663	781,701	Receivables from Banks

No.	Kategori Portofolio	31 Desember 2022 31 Desember 2022					Portfolio Category
		Tagihan Bersih Berdasarkan Wilayah Net Receivables by Region					
		Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Diluar Indonesia (Wilayah 4) Indonesia Outside (Zone 4)	Total	
(1)	(2)	(8)	(9)	(10)	(11)	(12)	(2)
5.	Tagihan berupa Covered Bond						Receivables in the form of Covered Bond
6.	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya						Receivables from Securities Companies and Other Financial Services Institutions
7.	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya						Receivables in the form of Subordinated Securities/Receivables, Equity and Other Capital Instruments
8.	Kredit Beragunan Rumah Tinggal	90,155	-	-	-	90,155	"Residential Property Collateralized Loans"
9.	Kredit Beragunan Properti Komersial	1,128,181	16,058	-	-	1,144,239	"Commercial Property Collateralized Loans"
10.	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi						Loan by Land Acquisition, Land Processing, and Construction
11.	Kredit Pegawai/Pensiunan	-	-	-	-	-	Employee/Retirement Loans
12.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	47,834	301	-	-	48,135	"Receivables from Microbusiness, Small Business, and Retail Portfolio"
13.	Tagihan kepada Korporasi		1,349,339	-	-	13,433,391	Receivables from Corporations
14.	Tagihan yang Telah Jatuh Tempo	441,607	99,576	-	-	541,183	Due Receivables
15.	Aset Lainnya	1,803,360	-	-	-	1,803,360	Other Assets
	Total		**1,466,274**	**-**	**109,663**	**26,292,037**	Total

*) Berdasarkan Surat OJK No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk. dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk

*) Based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk.

Tabel Pengungkapan Tagihan Bersih Berdasarkan Sektor Ekonomi - Bank secara Individual
Table of Disclosure of Net Receivables by Economic Sector – Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No.	Sektor Ekonomi Economi Sector	Tagihan Kepada Pemerintah Receivables from Government	Tagihan Kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan Kepada Bank Receivables from Banks	Tagihan berupa Covered Bond Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
31 DESEMBER 2023 / 31 DESEMBER 2023																
1.	Pertanian, Kehutanan, dan Perikanan Agriculture, Forestry, and Fisheries	-	-	-	-	-	-	-	-	-	-	-	128,136	489,871	4,875	-
2.	Pertambangan dan Penggalian Mining and Extractive Industries	-	-	-	10,251	-	-	-	-	-	-	-	74,627	678,707	5	-
3.	Industri pengolahan Processing Industry	9,920	-	-	-	-	-	-	-	-	-	-	363,757	1,965,225	9,685	-
4.	Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin Procurement of Electricity, Gas, Steam/ Hot Water, and Cold Air	-	-	-	260,418	-	-	-	-	-	-	-	64,399	23,972	-	-
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah	-	-	-	251,821	-	-	-	-	-	-	-	30,049	-	-	-

No.	Sektor Ekonomi Economi Sector	Tagihan Kepada Pemerintah Receivables from Government	Tagihan Kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan Kepada Bank Receivables from Banks	Tagihan berupa Covered Bond Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
	Water Management, Waste Water Management, Waste Management and Recycle															
6.	Konstruksi Construction	-	-	-	100,727	-	-	-	-	772,460	-	-	-	102,513	18,182	-
7.	Perdagangan besar dan eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance	-	-	-	47,255	-	-	-	-	-	-	-	1,047,019	2,281,448	54,196	-
8.	Pengangkutan dan Pergudangan Transportation and Warehousing	-	-	-	-	-	-	-	-	-	-	-	200,802	268,466	126,408	-
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum Provision of Accomodation and Foods & Beverages	-	-	-	-	-	-	-	-	44,628	-	-	112,013	702,802	36,836	-
10.	Informasi dan Komunikasi Information and Communication	40,790	-	-	-	-	-	-	-	2,000	-	-	85,887	234,220	-	-

No.	Sektor Ekonomi Economi Sector	Tagihan Kepada Pemerintah Receivables from Government	Tagihan Kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan Kepada Bank Receivables from Banks	Tagihan berupa Covered Bond Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
11.	Aktivitas Keuangan dan Asuransi Financial and Insurance Activities	6,060,689	931,856	53,157	1,415,151	-	3,564,372	215,931	-	-	-	-	381,219	2,083,396	-	-
12.	Real Estate Real Estate	-	14,961	-	36,041	-	-	-	-	2,322,497	-	-	-	1,499	319,028	-
13.	Aktivitas Profesi, Ilmiah, dan Teknis Professional, Scientific, and Technical Activities	-	-	-	4,651	-	-	-	-	8,404	-	-	39,683	424,866	5,573	-
14.	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya Leasing and Leasing Activities without Option Rights, Employment, Travel Agencies, and Other Business Supports	-	11,650	-	162,942	-	-	-	-	-	-	-	112,971	663,753	904	-
15.	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

No.	Sektor Ekonomi Economi Sector	Tagihan Kepada Pemerintah Receivables from Government	Tagihan Kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan Kepada Bank Receivables from Banks	Tagihan berupa Covered Bond Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
	"Government administration, land business and mandatory social service"															
16.	Pendidikan Education	-	-	-	-	-	-	-	-	-	-	-	29,178	97,842	1,727	-
17.	Aktivitas Kesehatan Manusia dan Aktivitas Sosial Human Health Activities and Social Activities	-	-	-	-	-	-	-	-	-	-	-	11,862	20,653	-	-
18.	Kesenian, Hiburan, dan Rekreasi Arts, Entertainment, and Recreation	-	-	-	-	-	-	-	-	-	-	-	35,799	36,052	-	-
19.	Aktivitas Jasa Lainnya Other Services Activities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20.	Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

No.	Sektor Ekonomi Economi Sector	Tagihan Kepada Pemerintah Receivables from Government	Tagihan Kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan Kepada Bank Receivables from Banks	Tagihan berupa Covered Bond Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
	Household Activities as an Employer; Activities that Produce Goods and Services by Households that are Used to Meet Their Own Needs															
21.	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya International Organizations and Other Extra International Organizations Activities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22.	Rumah Tangga Household	-			-	-	-	-		-	-		-	-	-	-
23.	Bukan Lapangan Usaha Non-Business	-	-	-	-	-	-	-	150,868	-	-	-	-	29,074	8,301	-
24.	Lainnya Others	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,183,389
	Total	**6,111,398**	**958,467**	**53,157**	**2,289,258**	**-**	**3,564,372**	**215,931**	**150,868**	**3,149,989**	**-**	**-**	**2,717,400**	**10,104,360**	**585,719**	**1,183,389**

*) Berdasarkan Surat OJK No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk. dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk

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Tabel Pengungkapan Tagihan Bersih Berdasarkan Sisa Jangka Waktu Kontrak - Bank secara Individual

Table of Disclosure of Net Receivables by Remaining Contract Period – Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2023 31 Desember 2023						31 Desember 2022 31 Desember 2022						Portfolio Category
		Tagihan bersih berdasarkan sisa jangka waktu kontrak Net Receivables by Remaining Contract Period						Tagihan bersih berdasarkan sisa jangka waktu kontrak Net Receivables by Remaining Contract Period						
		≤ 1 tahun ≤1 year	>1 thn s.d. 3 thn >1 to 3 years	>3 thn s.d. 5 thn >3 to 5 years	> 5 thn >5 years	Non-Kontraktual	Total	≤ 1 tahun ≤1 year	>1 thn s.d. 3 thn >1 to 3 years	>3 thn s.d. 5 thn >3 to 5 years	> 5 thn >5 years	Non-Kontraktual Non-Contractual	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(2)
1.	Tagihan Kepada Pemerintah	1,725,237	1,225,499	1,172,121	1,988,542	-	6,111,398	2,996,464	856,686	724,227	2,285,267	-	6,862,645	Receivables from Government
2.	Tagihan Kepada Entitas Sektor Publik	920,975	37,492	-	-	-	958,467	1,307,453	29,040	21,362	211,282	-	1,569,136	Receivables from Public Sector Entities
3.	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional	50,633	2,523	-	-	-	53,157	2,523	15,568	-	-	-	18,091	"Receivables from Multilateral Development Banks and International Institutions"
4.	Tagihan Kepada Bank	1,651,555	637,703	-	-	-	2,289,258	536,039	-	157,716	87,946	-	781,701	Receivables from Banks
5.	Tagihan berupa Covered Bond	-	-	-	-	-	-							Receivables in the form of Covered Bond
6.	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	2,076,027	654,333	794,012	40,000	-	3,564,372							Receivables from Securities Companies and Other Financial Services Institutions
7.	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	215,931	-	-	-	-	215,931							Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments

No.	Kategori Portofolio	31 Desember 2023 31 Desember 2023						31 Desember 2022 31 Desember 2022						Portfolio Category
		Tagihan bersih berdasarkan sisa jangka waktu kontrak Net Receivables by Remaining Contract Period						Tagihan bersih berdasarkan sisa jangka waktu kontrak Net Receivables by Remaining Contract Period						
		≤ 1 tahun ≤1 year	>1 thn s.d. 3 thn >1 to 3 years	>3 thn s.d. 5 thn >3 to 5 years	> 5 thn >5 years	Non-Kontraktual	Total	≤ 1 tahun ≤1 year	>1 thn s.d. 3 thn >1 to 3 years	>3 thn s.d. 5 thn >3 to 5 years	> 5 thn >5 years	Non-Kontraktual Non-Contractual	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(2)
8.	Kredit Beragunan Rumah Tinggal	6,337	8,538	39,496	96,497	-	150,868	4,155	15,627	17,695	52,679	-	90,155	Residential Property Collateralized Loans
9.	Kredit Beragunan Properti Komersial	1,212,648	301,700	570,717	1,064,924	-	3,149,989	324,827	60,635	197,745	561,031	-	1,144,239	Commercial Property Collateralized Loans
10.	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	-							Loan by Land Acquisition, Land Processing, and Construction
11.	Kredit Pegawai/ Pensiunan	-	-	-	-	-	-	-	-	-	-	-	-	Employee/ Retirement Loans
12.	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel	1,999,904	268,659	282,698	166,140	-	2,717,400	43,130	938	3,193	875	-	48,135	"Receivables from Microbusiness, Small Business, and Retail Portfolio"
13.	Tagihan kepada Korporasi	6,035,422	1,287,764	1,327,104	1,454,071	-	10,104,360	7,440,069	1,526,406	2,862,493	1,604,423	-	13,433,391	Receivables from Corporations
14.	Tagihan yang Telah Jatuh Tempo	246,649	279,841	13,362	45,868	-	585,719	182,390	77,365	237,384	44,044	-	541,183	Due Receivables
15.	Aset Lainnya	-	-	-	-	1,183,389	1,183,389	-	-	-	-	1,803,360	1,803,360	Other Assets
	Total	16,141,318	4,704,050	4,199,510	4,856,041	1,183,389	31,084,309	12,837,050	2,582,265	4,221,816	4,847,545	1,803,360	26,292,037	Total

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Tabel Pengungkapan Tagihan dan Pencadangan Berdasarkan Wilayah - Bank secara Individual

Table of Disclosure of Receivables and Allowances by Area – Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2023 31 Desember 2023					Description
		Wilayah Region					
		Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Diluar Indonesia (Wilayah 4) Indonesia Outside (Zone 4)	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(2)
1.	Tagihan	27,023,562	1,176,263	176,272	66	28,376,162	Receivables
2.	Tagihan yang mengalami peningkatan dan pemburukan risiko kredit (Stage 2 dan Stage 3)						Claims with Increased and Worsening Credit Risk (Stage 2 and Stage 3)
	a. Belum jatuh tempo	892,709	271,513	-	-	1,164,222	a. Not Due
	b. Telah jatuh tempo	669,350	44,737	-	-	714,087	b. Due
3.	CKPN - *Stage* 1	108,625	3,905	276	-	112,806	CKPN - Stage 1
4.	CKPN - *Stage* 2	213,614	120,084	-	-	333,699	CKPN - Stage 2
5.	CKPN - *Stage* 3	122,401	5,966	-	-	128,368	CKPN - Stage 3
6.	Tagihan yang dihapus buku	(139,196)	(54,726)	-	-	(193,922)	Receivables Written Off

(dalam jutaan rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2022 31 Desember 2023 Wilayah Region					Description
		Zona Indonesia Barat Indonesia Zone West (Zone 1)	Zona Indonesia Tengah Indonesia Zone Center (Zone 2)	Zona Indonesia Timur Indonesia Zone East (Zone 3)	Diluar Indonesia (Wilayah 4) Indonesia Outside (Zone 4)	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(2)
1.	Tagihan	23,191,752	1,541,170	-	109,663	24,842,584	Receivables
2.	Tagihan yang mengalami peningkatan dan pemburukan risiko kredit (Stage 2 dan Stage 3)						Claims with Increased and Worsening Credit Risk (Stage 2 and Stage 3)
	a. Belum jatuh tempo	1,286,733	239,986	-	-	1,526,720	a. Not Due
	b. Telah jatuh tempo	546,067	122,560	-	-	668,627	b. Due
3.	CKPN - *Stage* 1	112,831	9,294	-	-	122,124	CKPN - Stage 1
4.	CKPN - *Stage* 2	224,869	72,557	-	-	297,426	CKPN - Stage 2
5.	CKPN - *Stage* 3	104,460	22,983	-	-	127,444	CKPN - Stage 3
6.	Tagihan yang dihapus buku	(308,652)	(99,051)			(407,704)	Receivables Written Off

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Tabel Pengungkapan Tagihan dan Pencadangan Berdasarkan Sektor Ekonomi - Bank secara Individual

Table of Disclosure of Receivables and Allowances by Economic Sector – Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No.	Sektor Ekonomi	Tagihan Receivables	Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan kerugian penurunan nilai (CKPN) - Stage 1 Losses Allowance (ILA) - Stage 1	Cadangan kerugian penurunan nilai (CKPN) - Stage 2 Losses Allowance (ILA) - Stage 2	Cadangan kerugian penurunan nilai (CKPN) - Stage 3 Allowance (ILA) - Stage 3	Tagihan yang dihapus buku Receivables Written Off	Economi Sector
			Belum Jatuh Tempo Not Due	Telah jatuh tempo Due					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)
31 DESEMBER 2023 / 31 DESEMBER 2023									
1.	Pertanian, Kehutanan, dan Perikanan	582,543	29,377	6,159	1,917	11,494	1,283	-	Agriculture, Forestry, and Fisheries
2.	Pertambangan dan Penggalian	731,967	-	6	2,195	-	2	-	Mining and Extractive Industries
3.	Industri pengolahan	2,250,155	138,937	17,849	7,078	44,373	8,164	(18,296)	Processing Industry
4.	Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin	351,576	36,395	-	219	4,588	-	-	Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah	277,711	-	-	40	-	-	-	Water Management, Waste Water Management, Waste Management and Recycle
6.	Konstruksi	870,949	97,667	31,373	1,600	14,922	13,191	(39,975)	Construction
7.	Perdagangan besar dan eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor	2,910,906	110,218	105,801	24,631	28,986	51,605	(35,070)	Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance
8.	Pengangkutan dan Pergudangan	572,323	-	137,501	1,819	-	11,093	(11,083)	Transportation and Warehousing
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum	964,570	174,480	40,879	3,160	86,850	4,042	(54,199)	Provision of Accomodation and Foods & Beverages
10.	Informasi dan Komunikasi	377,600	114,700	-	569	25,449	-	-	Information and Communication
11.	Aktivitas Keuangan dan Asuransi	10,948,529	3,121	-	23,268	377	-	-	Financial and Insurance Activities
12.	Real Estate	4,522,162	334,016	351,888	40,538	99,818	32,860	(24,687)	Real Estate
13.	Aktivitas Profesi, Ilmiah, dan Teknis	457,265	2,648	8,750	1,454	302	3,177	-	Professional, Scientific, and Technical Activities

No.	Sektor Ekonomi	Tagihan Receivables	Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan kerugian penurunan nilai (CKPN) - Stage 1 Losses Allowance (ILA) - Stage 1	Cadangan kerugian penurunan nilai (CKPN) - Stage 2 Losses Allowance (ILA) - Stage 2	Cadangan kerugian penurunan nilai (CKPN) - Stage 3 Allowance (ILA) - Stage 3	Tagihan yang dihapus buku Receivables Written Off	Economi Sector
			Belum Jatuh Tempo Not Due	Telah jatuh tempo Due					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)
14.	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya	947,538	72,688	1,262	2,000	9,243	359	-	Leasing and Leasing Activities without Option Rights, Employment, Travel Agencies, and Other Business Supports
15.	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib	-	-	-	-	-	-	-	"Government administration, land business and mandatory social service"
16.	Pendidikan	130,546	31,314	2,406	422	3,837	680	-	Education
17.	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	31,209	-	-	243	-	-	-	Human Health Activities and Social Activities
18.	Kesenian, Hiburan, dan Rekreasi	71,610	-	-	364	-	-	-	Arts, Entertainment, and Recreation
19.	Aktivitas Jasa Lainnya	-	-	-	-	-	-	-	Other Services Activities
20.	Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri	-	-	-	-	-	-	-	Household Activities as an Employer; Activities that Produce Goods and Services by Households that are Used to Meet Their Own Needs
21.	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	-	-	-	-	-	-	-	International Organizations and Other Extra International Organizations Activities
22.	Rumah Tangga	-	-	-				-	Household
23.	Bukan Lapangan Usaha	193,613	18,659	10,212	1,290	3,460	1,911	(10,611)	Non-Business
24.	Lainnya	1,183,389	-	-	-	-	-	-	Others
	Total	28,376,162	1,164,222	714,087	112,806	333,699	128,368	(193,922)	Total

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Disclosure of Receivables by Due Date

1) Bank secara individu / Bank individually

(dalam jutaan rupiah / in million Rupiah)

No.	Jenis Eksposur	31 Desember 2023 / 31 December 2023				31 Desember 2022 / 31 December 2022				Exposure Type
		Tagihan Berdasarkan Hari Tunggakan / Receivables by Due Date				Tagihan Berdasarkan Hari Tunggakan / Receivables by Due Date				
		> 90 hari s.d. 120 hari / > 90 days to 120 days	> 120 hari s.d. 180 hari / > 120 days to 180 days	> 180 hari / > 180 days	Total	> 90 hari s.d. 120 hari / > 90 days to 120 days	> 120 hari s.d. 180 hari / > 120 days to 180 days	> 180 hari / > 180 days	Total	
a	b	c	d	e	f	g	h	i	j	
1.	Kredit yang termasuk dalam Tagihan yang Telah Jatuh Tempo	63,397	17,420	633,270	714,087					Loan included in Due Receivables
2.	Surat Berharga yang termasuk dalam Tagihan yang Telah Jatuh Tempo	-	-	-	-					Securities Included in Due Receivables
	TOTAL	63,397	17,420	633,270	714,087					TOTAL

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Pengungkapan Tambahan terkait Perlakuan terhadap Aset Bermasalah (CRB-A)
Additional Disclosures regarding Treatment of Non-Performing Assets (CRB-A)

Pengungkapan Aset Performing dan Non Performing
Disclosure of Performing and Non-Performing Assets

1) Bank secara individu / Bank individually

(dalam jutaan rupiah / in million Rupiah)

No	Deskripsi	Performing (Kualitas L dan DPK) Performing (Quality of L and DPK)		Non Performing (Kualitas KL, D, M) Non Performing (Quality of KL,D, M)						Description
				Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Tagihan yang Tidak Mengalami Penurunan Nilai Non Impaired Receivables				
						Memiliki Tunggakan > 90 hari Have Arrears > 90 days		Memiliki Tunggakan ≤ 90 hari Have Arrears ≤ 90 days		
		Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	
		a	b	c	d	e	f	g	h	
1.	Surat Berharga	6,285,564	8,272	-	-	-	-	-	-	Marketable Securities
2.	Kredit	17,885,280	435,011	743,463	130,822	-	-	-	-	Credit
	a. Korporasi	17,702,964	430,261	733,251	128,911	-	-	-	-	a. Corporate
	b. Ritel	182,316	4,750	10,212	1,911	-	-	-	-	b. Retail
3.	Transaksi Rekening Administratif	6,340,954	-	60	-	-	-	-	-	Administrative Account Transaction

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Pengungkapan Aset Restrukturisasi Performing dan Non Performing
Disclosure of Performing and Non-Performing Restructuring Assets

1) Bank secara Individual / Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No	Deskripsi	Performing (Kualitas L dan DPK) Performing (Quality of L and DPK)		Non Performing (Kualitas KL, D, M) Non Performing (Quality of KL,D, M)		Stage 1		Stage 2		Stage 3		Description
		Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	
		a	b	c	d	e	f	g	h	i	j	
1.	Surat Berharga	-	-	-	-	-	-	-	-	-	-	Marketable Securities
2.	Kredit	2,206,558	350,793	661,746	98,967	1,169,662	28,210	1,066,273	331,844	632,369	87,473	Credit
	a. Korporasi	2,164,885	346,044	652,819	97,505	1,139,333	27,890	1,054,929	329,648	623,443	86,011	a. Corporate
	b. Ritel	41,673	4,750	8,926	1,462	30,329	321	11,344	2,196	8,926	1,462	b. Retail
3.	Transaksi Rekening Administratif	102,950	-	60	-	72,191	-	30,819	-	-	-	Administrative Account Transaction

*) Berdasarkan Surat OJK No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk. dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk

*) Based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk

Pengungkapan Kuantitatif terkait Teknik MRK (CR3)
Disclosure of Quantitative related to MRK Techniques (CR3)

1) Bank secara Individual / Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No	Deskripsi	Tagihan yang Tidak Dijamin dengan Teknik MRK Not Guaranteed Receivables using MRK Techniques	Tagihan yang Dijamin dengan Teknik MRK Guaranteed Receivables using MRK Techniques	Tagihan yang Dijamin dengan Agunan Guaranteed Receivables by Collateral	Tagihan yang Dijamin dengan Garansi, Penjaminan dan/ atau Asuransi Kredit Guaranteed Receivables by Guarantee, Security and/or Credit Insurance	Tagihan yang Dijamin dengan Derivatif Kredit Receivables Secured by Credit Derivatives	Description
		a	b	c	d	e	
1.	Kredit	16,605,775	1,744,612	1,744,612	-		Credit
2.	Surat Berharga	6,277,292	-	-	-		Marketable Securities
3.	Total	22,883,066	1,744,612	1,744,612	-		Total
4.	Kredit dan Surat Berharga yang Telah Jatuh Tempo	714,087	-	-	-		Due Loans and Securities

2) Pengungkapan Tambahan / Additional Disclosure

1. Bank tidak memiliki eksposur kuantitatif terkait teknik MRK secara konsolidasi karena berdasarkan Surat OJK No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk. dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk
1. The Bank does not have quantitative exposure related to MRK techniques on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk

Pengungkapan Eksposur Risiko Kredit dan Dampak Teknik MRK (CR4)
Disclosure of Credit Risk Exposure and Impact of MRK Techniques (CR4)

1) Bank secara Individu / Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No	Kategori Portofolio	Tagihan Bersih Sebelum Penerapan FKK dan Teknik MRK Net Receivables Before Implementation of FKK and MRK Techniques		Tagihan Bersih Setelah Penerapan FKK dan Teknik MRK Net Receivables After Implementation of FKK and MRK Techniques		ATMR dan Rata-Rata Bobot Risiko RWA and Risk Weight Average		Portfolio Category
		Laporan Posisi Keuangan Statements of Financial Position	TRA	Laporan Posisi Keuangan Statements of Financial Position	TRA	ATMR	Rata-Rata Bobot Risiko (e/(c+d)) Risk Weight Average (e/(c+d))	
		a	b	c	d	e		
1.	Tagihan kepada Pemerintah	6,111,398	-	6,111,398	-	-	0%	Receivables from Government
2.	Tagihan Kepada Entitas Sektor Publik	789,967	635,000	789,967	168,500	307,592	32%	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	53,157	-	53,157	26,578	50%	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	1,647,371	10,461	1,647,371	4,184	460,099	28%	Receivables from Banks
	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain [1)]	3,342,875	1,899,969	3,327,875	221,497	1,082,392	30%	Receivables from Securities Companies and Other Financial Services Institutions 1)

No	Kategori Portofolio	Tagihan Bersih Sebelum Penerapan FKK dan Teknik MRK Net Receivables Before Implementation of FKK and MRK Techniques		Tagihan Bersih Setelah Penerapan FKK dan Teknik MRK Net Receivables After Implementation of FKK and MRK Techniques		ATMR dan Rata-Rata Bobot Risiko RWA and Risk Weight Average		Portfolio Category
		Laporan Posisi Keuangan Statements of Financial Position	TRA	Laporan Posisi Keuangan Statements of Financial Position	TRA	ATMR	Rata-Rata Bobot Risiko (e/(c+d)) Risk Weight Average (e/(c+d))	
		a	b	c	d	e		
5.	Tagihan berupa Covered Bond	-	-	-	-	-	0%	Receivables in the form of Covered Bond
6.	Tagihan kepada Korporasi - Eksposur Korporasi Umum [2]	8,553,381	2,406,948	7,314,073	1,550,980	7,645,305	86%	Receivables from Corporations - General Corporate Exposure 2)
	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain [3]	-	-	-	-	-	0%	Receivables from Securities Companies and Other Financial Services Institutions 3)
	Eksposur Pembiayaan Khusus[4]	-	-	-	-	-	0%	Special financing exposure4)
7.	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	215,931	-	215,931		539,826	250%	Receivables in the from Subordinated Securities/ Receivables, Equity and Other Capital Instruments
8.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	2,413,356	760,111	1,923,052	304,044	1,893,032	85%	Receivables from Microbusiness, Small Business, and Retail Portfolio
9.	Kredit Beragun Properti						0%	Property Collateralized Loans
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti	150,868	-	150,868	-	74,430	49%	Residential Property Collateralized Loans which the Payments Are Not Materially Dependent on Property Cash Flow
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti	-	-	-	-	-	0%	Residential Property Collateralized Loans which the Payments Are Materially Dependent on Property Cash Flow
	Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti	-	-	-	-	-	0%	Commercial Property Collateralized Loans which the Payments Are Not Materially Dependent on Property Cash Flow

No	Kategori Portofolio	Tagihan Bersih Sebelum Penerapan FKK dan Teknik MRK Net Receivables Before Implementation of FKK and MRK Techniques		Tagihan Bersih Setelah Penerapan FKK dan Teknik MRK Net Receivables After Implementation of FKK and MRK Techniques		ATMR dan Rata-Rata Bobot Risiko RWA and Risk Weight Average		Portfolio Category
		Laporan Posisi Keuangan Statements of Financial Position	TRA	Laporan Posisi Keuangan Statements of Financial Position	TRA	ATMR	Rata-Rata Bobot Risiko (e/(c+d)) Risk Weight Average (e/(c+d))	
		a	b	c	d	e		
	Kredit Beragun Properti Komersial yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti	2,919,842	575,368	2,919,842	230,147	2,802,719	89%	Commercial Property Collateralized Loans which the Payments Are Materially Dependent on Property Cash Flow
10.	Kredit Pengadaan tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	0%	Land Acquisition, Land Processing, and Construction Loans
11.	Tagihan yang Telah Jatuh Tempo	585,719	-	585,719	-	792,605	135%	Due Receivables
12.	Aset Lainnya	1,183,389	-	1,183,389	-	1,365,877	115%	Other Assets
	Total	27,914,096	6,341,014	26,169,485	2,532,510	16,990,456	59%	Total

2) Pengungkapan Tambahan / Additional Disclosure

1. 1. Bank tidak memiliki eksposur risiko kredit dan dampak teknik MRK secara konsolidasi karena berdasarkan Surat OJK No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk. dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk
1. The Bank has no exposure to credit risk and the impact of MRK techniques on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk.

Pengungkapan Eksposur berdasarkan Kelas Aset dan Bobot Risiko (CR5)
Disclosure of Exposure by Asset Class and Risk Weight (CR5)

1) Bank secara Individu / Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No	Kategori Portofolio Portfolio Category	0%	20%	50%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
1.	Tagihan kepada Pemerintah Receivables from Government	6,111,398	-	-	-	-		6,111,398

No	Kategori Portofolio Portfolio Category	20%	50%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
2.	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	572,137	386,330	-	-		958,467

No	Kategori Portofolio Portfolio Category	0%	20%	30%	50%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	-	-	-	53,157	-	-		53,157

No	Kategori Portofolio Portfolio Category	20%	30%	40%	50%	75%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
4.	Tagihan kepada Bank Receivables from Banks	1,640,316		11,239		-	-	-		1,651,555
	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya [1)] Receivables from Securities Companies and Other Financial Services Institutions [1)]	1,650,221	575,165	821,947	502,040	-	-	-		3,549,372

No	Kategori Portofolio Portfolio Category	10%	15%	20%	25%	35%	50%	100%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
5.	Tagihan berupa covered Bond Receivables in the form of Covered Bond	-	-	-	-	-	-	-		-

No	Kategori Portofolio Portfolio Category	20%	50%	65%	75%	80%	85%	100%	130%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
6.	Tagihan kepada Korporasi Umum [2)] Receivables from General Corporations [2)]	872,259	553,272	-	101,575	-	1,466,074	5,871,873	-	-		8,865,053
	Tagihan kepada Perusahaan efek dan lembaga jasa keuangan lain [3)] Receivables from Securities Companies and Other Financial Services Institutions [3)]	-	-	-	-		-	-		-		-

No	Kategori Portofolio Portfolio Category	20%	50%	65%	75%	80%	85%	100%	130%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
	Eksposur pembiayaan khusus [4] Special financing exposure [4]	-	-		-	-		-	-	-		-

No	Kategori Portofolio Portfolio Category	100%	150%	250%	400%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
7.	Tagihan kepada Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	-	-	215,931	-		215,931

No	Kategori Portofolio Portfolio Category	45%	75%	85%	100%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
8.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	-	-	2,227,096	-		2,227,096

No	Kategori Portofolio Portfolio Category	0%[5]	20%	25%	30%	35%	40%	45%	50%	60%	65%[5]	70%	75%	85%	90%	100%	105%	110%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
	Kredit Beragun Properti Property Collateralized Loans																				
9.	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Residential Property Collateralized Loans which the Payments Are Not Materially Dependent on Property Cash Flow		27,506	11,518	24,165		5,193		5,089			77,398									150,868
	tanpa pendekatan pembagian kredit [5] without loan sharing approach [5]																				
	dengan menggunakan pendekatan pembagian kredit (dijamin) [5] using a loan sharing approach (guaranteed) [5]																				

No	Kategori Portofolio Portfolio Category	0%[5]	20%	25%	30%	35%	40%	45%	50%	60%	65%[5]	70%	75%	85%	90%	100%	105%	110%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
	dengan menggunakan pendekatan pembagian kredit (dijamin) [5] using a loan sharing approach (guaranteed) [5]																				
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Residential Property Collateralized Loans which the Payments Are Materially Dependent on Property Cash Flow																				
	Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti																				

No	Kategori Portofolio Portfolio Category	0%[5]	20%	25%	30%	35%	40%	45%	50%	60%	65%[5]	70%	75%	85%	90%	100%	105%	110%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
	Commercial Property Collateralized Loans which the Payments Are Not Materially Dependent on Property Cash Flow																				
	tanpa pendekatan pembagian kredit [5] without loan sharing approach [5]																				
	dengan menggunakan pendekatan pembagian kredit (dijamin) [5] using a loan sharing approach (guaranteed) [5]																				
	dengan menggunakan pendekatan pembagian kredit (dijamin) [5] using a loan sharing approach (guaranteed) [5]																				

No	Kategori Portofolio Portfolio Category	0%[5]	20%	25%	30%	35%	40%	45%	50%	60%	65%[5]	70%	75%	85%	90%	100%	105%	110%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
	Kredit Beragun Properti Komersial yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Commercial Property Collateralized Loans which the Payments Are Materially Dependent on Property Cash Flow											1,311,179			740,987			1,097,824			3,149,989
	Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi [5] Land Acquisition, Land Processing, and Construction Loans [5]																				

No	Kategori Portofolio Portfolio Category	50%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
10.	Tagihan yang Telah Jatuh Tempo Other Assets	55,012	61,924	468,783		585,719

No	Kategori Portofolio Portfolio Category	0%	20%	100%	150%	1250% 5)	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
11.	Aset Lainnya	92,821		539,952	550,616			1,183,389

No.	Bobot Risiko Risk Weight	Tagihan Bersih Laporan Posisi Keuangan Net Receivables Statement of Financial Position	Tagihan Bersih TRA (sebelum pengenaan FKK) Net Receivables TRA (before FKK imposition)	Rata - Rata FKK FKK Average	Tagihan Bersih (Setelah Pengenaan FKK dan Teknik MRK) Net Receivables (After FKK and MRK Techniques)
1.	< 40%	11,356,105	1,764,000	22%	11,577,505
2.	40% - 70%	3,318,586	1,465,411	45%	3,781,855
3.	75%	101,575	-	-	101,575
4.	85%	2,428,450	2,917,059	53%	3,693,170
5.	90% - 100	8,396,132	144,780	40%	7,214,736
6.	105% - 130%	1,077,918	49,764	40%	1,097,824
7.	150%	1,019,399	-	-	1,019,399
8.	250%	215,931	-	-	215,931
9.	400%	-	-	-	-
10.	1250%	-	-	-	-
11.	**Total Tagihan Bersih** Total Net Receivables	27,914,096	6,341,014	20%	28,701,994

2) Pengungkapan Tambahan / Additional Disclosure

1. Bank tidak memiliki eksposur risiko kredit dan dampak teknik MRK secara konsolidasi karena berdasarkan Surat OJK No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk. dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk

1. The Bank has no exposure to credit risk and the impact of MRK techniques on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk

Tabel Pengungkapan Analisis Eksposur Counterparty Credit Risk (CCR1)
Table of Disclosure of Exposure Analysis of Counterparty Credit Risk (CCR1)

Bank tidak memiliki eksposur Counterparty Credit Risk (CCR1).
The Bank has no exposure of Counterparty Credit Risk (CCR1).

Tabel Pengungkapan Eksposur CCR berdasarkan Kategori Portofolio dan Bobot Risiko (CCR3)
Table CCR Exposure by Portfolio Category and Risk Weight (CCR3)

(dalam jutaan rupiah / in million Rupiah)

Bobot Risiko	31 Desember 2023 31 December 2023									Risk Weight
	a	b	c	d	e	f	g	h	i	
Kategori Potofolio	0%	10%	20%	50%	75%	100%	150%	Lainnya Other	Total Tagihan Bersih Total Net Receivables	Portfolio Category
Indonesia	-	-	-	-	-	-	-	-	-	Indonesia
Tagihan kepada Pemerintah dan Bank Sentral	-	-	-	-	-	-	-	-	-	Claims against Government and Central Bank
Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	- -	-	-	Claims against Public Sector Entities
Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	Claims against Multilateral Development Banks and International Institutions
Tagihan kepada Bank Lain	-	-	637,703	-	-	-	-	-	637,703	Receivables from Other Banks
Tagihan berupa Covered Bond	-	-	-	-	-	-	-	-	-	Receivables in the form of Covered Bond
Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	-	-	-	-	-	-	-	-	-	Receivables from Securities Companies and Other Financial Services Institutions

Bobot Risiko	31 Desember 2023 31 December 2023									Risk Weight
	a	b	c	d	e	f	g	h	i	
Kategori Potofolio	0%	10%	20%	50%	75%	100%	150%	Lainnya Other	Total Tagihan Bersih Total Net Receivables	Portfolio Category
Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	-	-	-	-	-	-	-	-	-	Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments
Kredit Beragunan Properti Rumah Tinggal	-	-	-	-	-	-	-	-	-	Residential Property Collateralized Loans
Kredit Beragunan Properti Komersial	-	-	-	-	-	-	-	-	-	Commercial Property Collateralized Loans
Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	-	-	-	-	Loan by Land Acquisition, Land Processing, and Construction
Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans
Tagihan kepada Korporasi	-	-	-	-	-	-	-	-	-	Receivables from Corporations
Tagihan Kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	-	-	-	-	-	-	-	-	-	Receivables from Microbusiness, Small Business, and Retail Portfolio
Tagihan yang Telah Jatuh Tempo	-	-	-	-	-	-	-	-	-	Due Receivables
Aset lainnya	-	-	-	-	-	-	-	-	-	Other Assets
Total	-	-	637,703	-	-	-	-	-	637,703	**Total**

(dalam jutaan rupiah / in million Rupiah)

Bobot Risiko	31 Desember 2022 31 Desember 2022									Risk Weight
	a	b	c	d	e	f	g	h	i	
Kategori Potofolio	0%	10%	20%	50%	75%	100%	150%	Lainnya Lainnya	Total Tagihan Bersih Total Net Receivables	Portfolio Category
Indonesia	-	-	-	-	-	-	-	-	-	Indonesia
Tagihan kepada Pemerintah dan Bank Sentral	599,025	-	-	-	-	-	-	-	599,025	Claims against Government and Central Bank
Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	-	-	-	Claims against Public Sector Entities
Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	Claims against Multilateral Development Banks and International Institutions
Tagihan kepada Bank Lain	-	-	240,859	-	-	-	-	-	240,859	Receivables from Other Banks
Tagihan berupa Covered Bond										Receivables in the form of Covered Bond
Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya										Receivables from Securities Companies and Other Financial Services Institutions
Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	-	-	-	-	-	-	-	-	-	Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments
Kredit Beragunan Properti Rumah Tinggal										Residential Property Collateralized Loans
Kredit Beragunan Properti Komersial										Commercial Property Collateralized Loans
Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi										Loan by Land Acquisition, Land Processing, and Construction
Kredit Pegawai/Pensiunan										Employee/Retirement Loans
Tagihan kepada Korporasi	-	-	-	-	-	-	-	-	-	Receivables from Corporations

Bobot Risiko	31 Desember 2022 31 Desember 2022									Risk Weight
	a	b	c	d	e	f	g	h	i	
Kategori Potofolio	0%	10%	20%	50%	75%	100%	150%	Lainnya Lainnya	Total Tagihan Bersih Total Net Receivables	Portfolio Category
Tagihan Kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	-	-	-	-	-	-	-	-	-	Receivables from Microbusiness, Small Business, and Retail Portfolio
Tagihan yang Telah Jatuh Tempo										Due Receivables
Aset lainnya	-	-	-	-	-	-	-	-	-	Other Assets
Total	**599,025**	**-**	**240,859**	**-**	**-**	**-**	**-**	**-**	**839,885**	**Total**

Tabel Pengungkapan Tagihan Bersih Derivatif Kredit (CCR6)

Table of Disclosure of Net Receivables of Credit Derivative (CCR6)

Bank tidak memiliki eksposur Derivatif Kredit (CCR6)

The Bank has no Credit Derivative exposure (CCR6)

Tabel Eksposur Sekuritisasi pada Banking Book (Tabel SEC1)
Disclosure of Security Exposures in the Banking Book (Tabel SEC1)

(dalam jutaan rupiah / in million Rupiah)

No	Kategori Portofolio	31 Desember 2023 31 Desember 2023									Portofolio Category
		a	b	c	e	f	g	i	j	k	
		Bank sebagai originator Bank as Originator			Bank sebagai sponsor Bank as Sponsor			Bank sebagai investor Bank as Investor			
		Traditional Traditional	Sintetis Synthetic	Sub-total	Traditional Traditional	Sintetis Synthetic	Sub-total	Traditional Traditional	Sintetis Synthetic	Sub-total	
1.	Retail (total) –antara lain	-	-	-	-	-	-	8,593	-	8,593	Retail (Total) - Among Others
2.	Kredit perumahan	-	-	-	-	-	-	8,593	-	8,593	Housing Loans
3.	Kartu kredit	-	-	-	-	-	-	-	-	-	Credit Cards
4.	Eksposur ritel lainnya	-	-	-	-	-	-	-	-	-	Other Retail Exposures
5.	Re-sekuritisasi	-	-	-	-	-	-	-	-	-	Re-Securitization
6.	Non-retail (total) – antara lain	-	-	-	-	-	-	-	-	-	Non-Retail (Total) - Among Others
7.	Kredit korporasi	-	-	-	-	-	-	-	-	-	Corporate Loans
8.	Kredit komersil	-	-	-	-	-	-	-	-	-	Commercial Credit
9.	Sewa dan piutang	-	-	-	-	-	-	-	-	-	Rent and Accounts Receivable
10.	Non-retail lainnya	-	-	-	-	-	-	-	-	-	Other Non-Retail
11.	Re-sekuritisasi	-	-	-	-	-	-	-	-	-	Re-Securitization

(dalam jutaan rupiah / in million Rupiah)

No	Kategori Portofolio	31 Desember 2022 31 Desember 2022									Portofolio Category
		a	b	c	e	f	g	i	j	k	
		Bank sebagai originator Bank as Originator			Bank sebagai sponsor Bank as Sponsor			Bank sebagai investor Bank as Investor			
		Traditional Traditional	Sintetis Synthetic	Sub-total	Traditional Traditional	Sintetis Synthetic	Sub-total	Traditional Traditional	Sintetis Synthetic	Sub-total	
1.	Retail (total) –antara lain	-	-	-	-	-	-	22,015	-	22,015	Retail (Total) - Among Others
2.	Kredit perumahan	-	-	-	-	-	-	22,015	-	22,015	Housing Loans
3.	Kartu kredit	-	-	-	-	-	-	-	-	-	Credit Cards
4.	Eksposur ritel lainnya	-	-	-	-	-	-	-	-	-	Other Retail Exposures
5.	Re-sekuritisasi	-	-	-	-	-	-	-	-	-	Re-Securitization
6.	Non-retail (total) – antara lain	-	-	-	-	-	-	-	-	-	Non-Retail (Total) - Among Others
7.	Kredit korporasi	-	-	-	-	-	-	-	-	-	Corporate Loans
8.	Kredit komersil	-	-	-	-	-	-	-	-	-	Commercial Credit
9.	Sewa dan piutang	-	-	-	-	-	-	-	-	-	Rent and Accounts Receivable
10.	Non-retail lainnya	-	-	-	-	-	-	-	-	-	Other Non-Retail
11.	Re-sekuritisasi	-	-	-	-	-	-	-	-	-	Re-Securitization

Analisis Kualitatif
Qualitative Analysis

Bank melakukan investasi pada pihak ketiga (produk EBA) yang mempunyai peringkat *investment grade* AAA s.d AA- sebagai upaya untuk mendiversifikasi risiko likuiditas (*Liquidity Facility*) dan *return.*
Bank invests in third parties (ABS products) with investment grade ratings of AAA to AA- as an effort to diversify liquidity risk (Liquidity Facility) and returns.

Tabel Eksposur Sekuritisasi pada *Trading Book* (Tabel SEC2)
Table of Securitization Exposure in the Trading Book (Table SEC2)

Bank tidak memiliki *eksposur* sekuritisasi pada trading book.
The Bank has no securitization exposure in the trading book.

Tabel Eksposur Sekuritisasi pada Banking Book dan terkait Persyaratan Modalnya – Bank yang Bertindak Sebagai Originator atau Sponsor (SEC3)

Table of Securitization Exposure in the Banking Book and related to its Capital Requirements – Bank Acting as Originator or Sponsor (SEC3)

Bank tidak memiliki eksposur sekuritisasi pada *Banking Book* sebagai Originator atau Sponsor

The Bank has no securitization exposure in the Banking Book as Originator or Sponsor.

Tabel Eksposur Sekuritisasi pada Banking Book dan Persyaratan Modalnya – Bank yang Bertindak Sebagai Investor (SEC4)

Table of Securitization Exposure in Banking Book and related to its Capital Requirements – Bank Acting as Investor (SEC4)

(dalam jutaan rupiah / in million Rupiah)

No	Kategori Portofolio	31 Desember 2023 31 Desember 2023																	Portofolio Category
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	
		Nilai eksposur (berdasarkan Bobot Risiko) Exposure Value (based on Risk Weight)					Nilai eksposur (berdasarkan *regulatory approach*) Exposure Value (based on Regulatory Approach)				ATMR (berdasarkan *regulatory approach*) ATMR (based on Regulatory Approach)				*Capital charge after cap*				
		≤20% Bobot Risiko ≤20% Risk Weighted	>20% to 50% Bobot Risiko >20% to 50% Risk Weighted	>50% to 100% Bobot Risiko >50% to 100% Risk Weighted	>100% to <1.250 % Bobot Risiko >100% to <1,250% Risk Weighted	1.250 % Bobot Risiko 1,250% Risk Weighted	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	
1.	Total eksposur	8,593	-	-	-	-		-	8,593	-		-	1,719	-		-	1,719	-	Total Exposure
2.	Sekuritisasi tradisional	8,593	-	-	-	-		-	8,593	-		-	1,719	-		-	1,719	-	Traditional Securitization
3.	Dimana *underlying* sekuritisasi	8,593	-	-	-	-		-	8,593	-		-	1,719	-		-	1,719	-	In Which the Underlying Securitization
4.	ritel	8,593	-	-	-	-		-	8,593	-		-	1,719	-		-	1,719	-	Retail
5.	non-ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Retail
6.	Dimana re-sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In Which Re-Securitization

No	Kategori Portofolio	31 Desember 2023 31 Desember 2023																Portofolio Category
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	
		Nilai eksposur (berdasarkan Bobot Risiko) Exposure Value (based on Risk Weight)					Nilai eksposur (berdasarkan *regulatory approach*) Exposure Value (based on Regulatory Approach)				ATMR (berdasarkan *regulatory approach*) ATMR (based on Regulatory Approach)				*Capital charge after cap*				
		≤20% Bobot Risiko ≤20% Risk Weighted	>20% to 50% Bobot Risiko >20% to 50% Risk Weighted	>50% to 100% Bobot Risiko >50% to 100% Risk Weighted	>100% to <1.250 % Bobot Risiko >100% to <1,250% Risk Weighted	1.250 % Bobot Risiko 1,250% Risk Weighted	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	
7.	Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Senior
8.	Non-senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Senior
9.	Sekuritisasi sintetis	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Synthetic Securitization
10.	Dimana underlying sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In Which the Underlying Securitization
11.	ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Retail
12.	non-ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Retail
13.	Dimana re-sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In Which Re-Securitization
14.	Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Senior
15.	Non-senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Senior

(dalam jutaan rupiah / in million Rupiah)

No	Kategori Portofolio	31 Desember 2022 31 Desember 2022																	Portofolio Category
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	
		Nilai eksposur (berdasarkan Bobot Risiko) Exposure Value (based on Risk Weight)					Nilai eksposur (berdasarkan *regulatory approach*) Exposure Value (based on Regulatory Approach)				ATMR (berdasarkan *regulatory approach*) ATMR (based on Regulatory Approach)				*Capital charge after cap*				
		≤20% Bobot Risiko ≤20% Risk Weighted	>20% to 50% Bobot Risiko >20% to 50% Risk Weighted	>50% to 100% Bobot Risiko >50% to 100% Risk Weighted	>100% to <1.250 % Bobot Risiko >100% to <1,250% Risk Weighted	1.250 % Bobot Risiko 1,250% Risk Weighted	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	
1.	Total eksposur	22,015	-	-	-	-		-	22,015	-		-	4,403	-		-	4,403	-	Total Exposure
2.	Sekuritisasi tradisional	22,015	-	-	-	-		-	22,015	-		-	4,403	-		-	4,403	-	Traditional Securitization
3.	Dimana *underlying* sekuritisasi	22,015	-	-	-	-		-	22,015	-		-	4,403	-		-	4,403	-	In Which the Underlying Securitization
4.	ritel	22,015	-	-	-	-		-	22,015	-		-	4,403	-		-	4,403	-	Retail
5.	non-ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Retail
6.	Dimana re-sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In Which Re-Securitization
7.	Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Senior

No	Kategori Portofolio	31 Desember 2022 31 Desember 2022																Portofolio Category
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	
		Nilai eksposur (berdasarkan Bobot Risiko) Exposure Value (based on Risk Weight)					Nilai eksposur (berdasarkan *regulatory approach*) Exposure Value (based on Regulatory Approach)				ATMR (berdasarkan *regulatory approach*) ATMR (based on Regulatory Approach)				*Capital charge after cap*				
		≤20% Bobot Risiko ≤20% Risk Weighted	>20% to 50% Bobot Risiko >20% to 50% Risk Weighted	>50% to 100% Bobot Risiko >50% to 100% Risk Weighted	>100% to <1.250 % Bobot Risiko >100% to <1,250% Risk Weighted	1.250 % Bobot Risiko 1,250% Risk Weighted	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	IRB RBA	IRB SFA	SA/ SSFA	1,250%	
8.	Non-senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Senior
9.	Sekuritisasi sintetis	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Synthetic Securitization
10.	Dimana underlying sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In Which the Underlying Securitization
11.	ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Retail
12.	non-ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Retail
13.	Dimana re-sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In Which Re-Securitization
14.	Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Senior
15.	Non-senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Senior

Analisis Kualitatif
Qualitative Analysis

Untuk eksposur sekuritisasi pada banking book, perhitungan ATMR risiko kredit dilakukan dengan menggunakan pendekatan standar (*standardized approach*), dimana sekuritisasi tersebut memiliki *investment grade* AAA s.d AA- yang memiliki bobot 20% pada perhitungan ATMR.

For securitization exposure in the banking book, credit risk RWA is calculated by using a standardized approach, in which the securitization has investment grade of AAA to AA- with a 20% weight in RWA calculation.

Tabel Pengungkapan Risiko Pasar Dengan Menggunakan Metode Standar
Table of Disclosure of Market Risk Using Standardized Method

(dalam jutaan rupiah / in million Rupiah)

No.	Jenis Risiko	31 Desember 2023 31 Desember 2023				31 Desember 2022 31 Desember 2022				Type of Risk
		Individual Individually		Konsolidasi Consolidate		Individual Individually		Konsolidasi Consolidate		
		Beban Modal Capital Expenses	ATMR	Beban Modal Capital Expenses	ATMR	Beban Modal Capital Expenses	ATMR	Beban Modal Capital Expenses	ATMR	
	(2)	(3)	(4)	(5)		(7)	(8)	(9)		
1.	Risiko Suku Bunga	53,756	671,954	-	-	**37,764**	**472,052**			Interest Rate Risk
	a. Risiko Spesifik	49,037	612,958	-	-	30,356	379,446			a. Specific Risk
	b. Risiko Umum	4,720	58,996	-	-	7,408	92,606			b. General Risk
2.	Risiko Nilai Tukar	1,053	13,165	-	-	486	6,079			Exchange Rate Risk
3.	Risiko Ekuitas *)									Equity Risk*)
4.	Risiko Komoditas *)									Commodity Risk*)
5.	Risiko Option	-	-	-	-	-	-	-	-	Option Risk
	Total	54,810	685,119	-	-	**38,250**	**478,131**			Total

Tabel *Interest Rate Risk in Banking Book* - Laporan Penerapan Manajemen Risiko untuk IRRBB

Table of Interest Rate Risk in the Banking Book - Report on Risk Management Implementation for IRRBB

Bank berada dalam Buku 2 (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak memenuhi kriteria untuk mengungkapkan laporan perhitungan Interest Rate Risk in Banking Book (IRRBB) sesuai Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018 tanggal 21 Agustus 2018 tentang Penerapan Manajemen Risiko dan Pengukuran Risiko Pendekatan Standar Untuk Risiko Suku Bunga dalam Banking Book (IRRBB) Bagi Bank Umum. Dalam hal mengendalikan risiko suku bunga pada banking book, Bank menggunakan analisa sensitivitas berdasarkan maturity gap yang disusun dalam rangka pemenuhan ketentuan mengenai penilaian tingkat kesehatan Bank Umum dan penerapan manajemen risiko bagi Bank Umum. Parameter tersebut dapat memberikan indikasi atas risiko terhadap perspektif nilai ekonomis dan perspektif pendapatan Bank yang timbul dari pergerakan skenario suku bunga dalam kondisi shock yang mempengaruhi posisi banking book pada Bank.

The Bank is in BUKU 2 group (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not meet the criteria for disclosing a report on the calculation of Interest Rate Risk in Banking Book (IRRBB) according to Financial Services Authority Circular No. 12/SEOJK.03/2018 dated 21 August 2018 on Implementation of Risk Management and Standard Approach for Risk Measurement for Interest Rate Risk in the Banking Book (IRRBB) for Commercial Banks. In terms of controlling interest rate risk in the banking book, the Bank uses a sensitivity analysis based on a maturity gap which is prepared in order to comply with the provisions on assessment of soundness level of Commercial Banks and the implementation of risk management for Commercial Banks. These parameters can provide an indication of risks to the economic value perspective and the Bank's income perspective arising from fluctuations in interest rate scenarios under shock conditions that affect the banking book position at the Bank.

Tabel *Interest Rate Risk in Banking Book* - Laporan Perhitungan IRRBB

Table of Interest Rate Risk in Banking Book - IRRBB Calculation Report

Bank kelompok BUKU 2 (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak mengungkapkan laporan perhitungan *Interest Rate Risk in Banking Book* (IRRBB) sebagaimana diatur didalam Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018

The Bank is in BUKU 2 group (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not report the calculation of Interest Rate Risk in Banking Book (IRRBB) as stipulated in the Financial Services Authority Circular No. 12/SEOJK.03/2018.

Tabel Risiko Likuiditas - Laporan Perhitungan Rasio Kecukupan Likuiditas (LCR)

Table of Liquidity Risk - Liquidity Adequacy Ratio (LCR) Calculation Report

Bank kelompok BUKU 2 (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak mengungkapkan laporan perhitungan rasio kecukupan *Liquidity Covered Ratio* (LCR) sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 tentang Kewajiban Pemenuhan Rasio Kecukupan Likuiditas bagi Bank Umum.

The Bank is in BUKU 2 group (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not report the calculation of adequacy of Liquidity Covered Ratio (LCR) as stipulated in the Financial Services Authority Regulation No. 42/POJK.03/2015 on the Obligation to Fulfill the Liquidity Adequacy Ratio for Commercial Banks.

Tabel Risiko Likuiditas - Laporan NSFR

Table of Liquidity Risk - NSFR Report

Bank kelompok BUKU 2 (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak mengungkapkan laporan *Nett Stable Funding Ratio* (NSFR) sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 tentang Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih bagi Bank Umum.

The Bank is in BUKU 2 group (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not report the Net Stable Funding Ratio (NSFR) as stipulated in the Financial Services Authority Regulation No. 50/POJK.03/2017 on the Obligation to Fulfill Net Stable Funding Ratio for Commercial Banks.

Tabel Risiko Likuiditas - Aset Terikat (*Encumbrance*) (ENC)

Table of Liquidity Risk - Encumbrance (ENC)

Bank kelompok BUKU 2 (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak mengungkapkan Aset Terikat *(Encumbrance)* sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 tentang Kewajiban Pemenuhan Rasio Kecukupan Likuiditas bagi Bank Umum.

The Bank is in BUKU 2 group (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not disclose Encumbrance as stipulated in the Financial Services Authority Regulation No. 42/POJK.03/2015 on the Obligation to Fulfill the Liquidity Adequacy Ratio for Commercial Banks.

Tabel Pengungkapan Risiko Operasional
Table of Disclosure of Operational Risk

Tabel Pengungkapan Kuantitatif Risiko Operasional - Bank secara Individual
Table of Disclosure of Operational Risk Quantitative - Bank Individually

(dalam jutaan rupiah / in million Rupiah)

No.	Pendekatan yang Digunakan	31 Desember 2023 31 December 2023 Jumlah Total	Approach Used
1.	Pendekatan Standar		Standardized Approach
	Komponen Indikator Bisnis (KIB)	117,338,587,298	Business Indicator Components (KIB)
	Faktor Pengali Kerugian Internal (FPKI)	1	Internal Loss Multiplier Factor (FPKI)
	Modal Minimum Risiko Operasional (MMRO)	117,338,587,298	Operational Risk Minimum Capital (MMRO)
	ATMR untuk Risiko Operasional	1,466,732,341,225	RWA for Operational Risk

Tabel Pengungkapan Kuantitatif Risiko Operasional - Bank secara Konsolidasi dengan Entitas Anak
Table of Disclosure of Operational Risk Quantitative - Bank Consolidated with Subsidiaries

Bank tidak memiliki eksposur risiko operasional secara konsolidasi karena berdasarkan Surat OJK No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk. dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk

The Bank has no operational risk exposure on a consolidated basis due to based on OJK Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Letter No. 133/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International TbkW



TANGGUNG JAWAB SOSIAL DAN LINGKUNGAN HIDUP

Social and Environmental Responsibility





Bank Victoria menyadari bahwa kesuksesan di industri perbankan tidak hanya bergantung pada manajemen dan operasional, tetapi juga pada kontribusi terhadap pengembangan sosial, masyarakat, dan lingkungan. Oleh karenanya, Bank berkomitmen untuk menjalankan kegiatan usaha dengan memprioritaskan keselarasan antara aspek ekonomi, sosial, dan lingkungan. Melalui pelaksanaan Program Tanggung Jawab Sosial dan Lingkungan Hidup (TJSL), Bank Victoria berusaha mendukung pertumbuhan ekonomi yang stabil, inklusif, dan berkelanjutan.

Bank Victoria realizes that the success in banking industry depends not only on management and operations, but also on contributions to social, community, and environmental development. Therefore, the Bank is committed to performing business activities by prioritizing harmony between economic, social, and environmental aspects. Through the implementation of Social and Environmental Responsibility Program (TJSL), Bank Victoria seeks to support a stable, inclusive, and sustainable economic growth.

Tata Kelola Keberlanjutan
Sustainability Governance

Bank secara konsisten menerapkan prinsip-prinsip GCG dalam kegiatan usaha dengan berfokus pada manajemen risiko terkait aspek ekonomi, sosial, dan lingkungan. Implementasi GCG dilakukan melalui berbagai program yang sesuai dengan peraturan dan undang-undang yang berlaku, serta mengikuti *standard best practices* dalam Laporan Keberlanjutan.

The Bank consistently applies GCG principles in business activities by focusing on risk management related to economic, social, and environmental aspects. GCG is implemented through various programs that comply with the applicable laws and regulations, and follow the standard best practices in Sustainability Report.

Penerapan GCG Bank mengacu pada 7 (tujuh) subjek inti ISO 26000 tentang *Guidance Standard on Social Responsibility,* yaitu:

1. Tata kelola organisasi;
2. Isu produk dan pelanggan;
3. Pemenuhan hak asasi manusia;
4. Praktik ketenagakerjaan, kesehatan, dan keselamatan kerja;
5. Lingkungan hidup;
6. Prosedur operasi yang adil; dan
7. Perlibatan dan pengembangan masyarakat.

The Bank's GCG implementation refers to the 7 (seven) core subjects of ISO 26000 on Guidance Standard on Social Responsibility, namely:

1. Organizational governance;
2. Products and customers issues;
3. Fulfillment human rights;
4. Practices of employment, occupational health and safety;
5. Environment;
6. Fair operating procedures; and
7. Community engagement and development.

Dalam upaya menerapkan GCG, Bank juga melakukan internalisasi prinsip-prinsip keuangan berkelanjutan ke seluruh aspek kegiatan bisnis yang diuraikan sebagai berikut:

To implement GCG, the Bank also internalizes the principles of sustainable finance in all business aspects which are described as follows:

Prinsip Keuangan Berkelanjutan Sustainable Finance Principles	Implementasi di Bank Implementation at the Bank
Investasi Bertanggung Jawab Responsible Investment	Keputusan investasi Bank mempertimbangkan faktor ekonomi, sosial, lingkungan hidup, dan tata kelola agar dapat mengelola risiko secara lebih baik dan menghasilkan keuntungan jangka panjang yang berkelanjutan. The Bank's investment decisions consider the economic, social, environmental, and governance factors in order to manage the risks better and generate long-term, sustainable returns.
Strategi dan Praktik Bisnis Berkelanjutan Sustainable Business Strategies and Practices	Bank berfokus pada pencapaian tujuan jangka panjang dan menetapkan strategi jangka pendek untuk mencapainya. The Bank focuses on achieving long-term goals and setting short-term strategies to achieve them.

Prinsip Keuangan Berkelanjutan Sustainable Finance Principles	Implementasi di Bank Implementation at the Bank
Pengelolaan Risiko Sosial dan Lingkungan Hidup Social and Environmental Risk Management	Bank menerapkan prinsip kehati-hatian dalam mengukur risiko sosial dan lingkungan hidup dari aktivitas penghimpunan dan penyaluran dana. The Bank applies the prudence principle in measuring social and environmental risks from the funding and lending activities.
Tata Kelola Governance	Manajemen dan seluruh aktivitas operasi Bank menerapkan pilar governansi korporat, yaitu perilaku beretika, akuntabilitas, transparansi, dan keberlanjutan secara konsisten. The Management and all of the Bank's operational activities consistently apply the corporate governance pillars, namely ethical behavior, accountability, transparency, and sustainability.
Komunikasi yang Informatif Informative Communication	Bank menyediakan laporan yang informatif, mencakup strategi, tata kelola, kinerja, dan prospek ke depan. The Bank provides informative reports, covering strategy, governance, performance, and prospects.
Inklusif Inclusive	Bank berupaya menjamin ketersediaan dan keterjangkauan produk dan jasa sehingga dapat diakses oleh seluruh lapisan masyarakat, bahkan termasuk yang belum memiliki akses terhadap produk dan jasa perbankan. The Bank strives to ensure the availability and affordability of products and services so that they can be accessed by all levels of community, including those who do not have access to banking products and services.
Pengembangan Sektor Unggulan Prioritas Priority Leading Sector Development	Bank mempertimbangkan sektor-sektor unggulan prioritas yang telah ditetapkan oleh pemerintah melalui Rencana Pembangunan Jangka Menengah (RPJM) dan Rencana Pembangunan Jangka Panjang (RPJP). The Bank considers the priority leading sectors that have been determined by the government through the Medium-Term Development Plan (RPJM) and the Long-Term Development Plan (RPJP).
Koordinasi dan Kolaborasi Coordination and Collaboration	Dalam rangka menyelaraskan kebijakan, strategi, peluang bisnis, dan inovasi produk dan jasa dengan kepentingan nasional, Bank berpartisipasi dalam forum/kegiatan/kerja sama terkait keuangan berkelanjutan, baik pada tingkat lokal, nasional, maupun regional. To align policies, strategies, business opportunities, and innovation of products and services with national interests, the Bank participates in forums/activities/cooperations related to sustainable finance, at local, national, or regional levels.

Struktur Tata Kelola Keberlanjutan [POJK E.1]

Penerapan prinsip keuangan berkelanjutan di Bank Victoria melibatkan berbagai pihak. Untuk memastikan keberhasilan penerapan prinsip keuangan berkelanjutan, Bank telah menetapkan struktur tata kelola keberlanjutan. Susunan struktur tata kelola keberlanjutan Bank sama dengan struktur GCG Bank.

Tugas dan tanggung jawab unit/divisi pelaksana penerapan prinsip keuangan berkelanjutan di lingkungan kerja Bank Victoria diuraikan sebagai berikut:

1. *Compliance & System Procedure* bertugas mengawasi realisasi penyusunan standar operasional;
2. *Human Capital Management* bertugas mengawasi pelaksanaan pelatihan, khususnya terkait aspek keuangan berkelanjutan yang dilaksanakan bagi karyawan Bank;
3. *Credit Risk Review* bertugas mengawasi penyaluran kredit kepada kegiatan usaha berwawasan lingkungan;
4. *Business Unit* bertugas menyalurkan kredit kepada debitur-debitur yang termasuk kategori kegiatan usaha berwawasan lingkungan;
5. *Risk Management/Integrated* bertugas memantau eksposur risiko yang terkait dengan keuangan berkelanjutan; dan
6. *Corporate Secretary* bertugas mengonsolidasikan hasil pengawasan atau tinjauan yang telah dilakukan oleh masing-masing unit/divisi.

Sustainable Governance Structure [POJK E.1]

The application of sustainable finance principles at Bank Victoria involves various parties. To ensure the successful implementation of sustainable finance principles, the Bank has established a sustainable governance structure. The composition of the Bank's sustainability governance structure is the same as the Bank's GCG structure.

The duties and responsibilities of the units/divisions executing the implementation of sustainable finance principles within Bank Victoria's work environment are described as follows:

1. Compliance & System Procedure having the duty to supervise the realization of the preparation of operational standards;
2. Human Capital Management having the duty to supervise training implementation, related to sustainable finance aspects carried out for the Bank's employees;
3. Credit Risk Review having the duty to supervise financing distribution to environmentally friendly business activities;
4. Business Unit having the duty to distribute loans to debtors categorized as environmentally friendly business activities;
5. Risk Management/Integrated having the duty to monitor risk exposure related to sustainable finance; and
6. Corporate Secretary having the duty to consolidate the results of supervision or review conducted by each unit/division.

Dalam pelaksanaannya, masing-masing unit/divisi mengimplementasikan dan mengawasi penerapan prinsip keuangan berkelanjutan. Selanjutnya, hasil pengawasan tersebut disampaikan kepada Divisi *Corporate Secretary* untuk ditindaklanjuti dan dikonsolidasikan kepada Direktur Kepatuhan dan Manajemen Risiko. Direktur Kepatuhan dan Manajemen Risiko akan menyampaikan hasil tersebut kepada Direksi untuk dievaluasi sehingga penerapan keuangan berkelanjutan yang dilakukan berjalan semakin baik. Selain itu, Dewan Komisaris berperan untuk mengawasi proses pengambilan keputusan, implementasi, serta pencapaian pelaksanaan RAKB.

In its implementation, each unit/division implements and monitors the implementation of sustainable finance principles. Furthermore, the monitoring results are submitted to the Corporate Secretary Division to be followed up and consolidated to the Director of Compliance and Risk Management. The Director of Compliance and Risk Management will then submit the results to the Board of Directors for evaluation, in order for the implementation of sustainable finance to run more smoothly. In addition, the Board of Commissioners' role is to monitor the process of decision making, implementation, and achievement of the RAKB implementation.

Pengembangan Kompetensi terkait Keuangan Berkelanjutan [POJK E.2]

Karyawan Bank yang bertanggung jawab dalam penerapan keuangan berkelanjutan diikutsertakan dalam berbagai program pengembangan kompetensi terkait penerapan prinsip tersebut. Program pengembangan kompetensi terkait keuangan berkelanjutan yang diikuti karyawan Bank di sepanjang tahun 2023, diungkapkan sebagai berikut:

Competency Development Related to Sustainable Finance [POJK E.2]

The Bank employees responsible for implementing sustainable finance are enrolled in various competency development programs related to the implementation of such principles. The competency development programs related to sustainable finance that Bank employees participated throughout 2023 are disclosed as follows:

Jenjang Jabatan Level of Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers	
Dewan Komisaris Board of Commissioners	*Training* Keuangan Berkelanjutan: Integrasi *Govenance, Risk Management, and Compliance* dalam Penerapan *Environmental, Social, and Governance* (oleh Bank Victoria, Lembaga Pengembangan Perbankan Indonesia, dan Otoritas Jasa Keuangan Institute).	Sustainable Finance Training: Integration of Governance, Risk Management, and Compliance in the Implementation of Environmental, Social, and Governance (by Bank Victoria, Indonesian Banking Development Institute, and Financial Services Authority Institute).
Direksi Board of Directors	1. *Training* Keuangan Berkelanjutan: Integrasi *Govenance, Risk Management, and Compliance* dalam Penerapan *Environmental, Social, and Governance* (oleh Bank Victoria, Lembaga Pengembangan Perbankan Indonesia, dan Otoritas Jasa Keuangan Institute); dan 2. *Managing Environmental, Social and Governance Risks and Opportunities* (oleh Otoritas Jasa Keuangan Institute).	1. Sustainable Finance Training: Integration of Governance, Risk Management, and Compliance in the Implementation of Environmental, Social, and Governance (by Bank Victoria, Indonesian Banking Development Institute, and Financial Services Authority Institute). 2. Managing Environmental, Social and Governance Risks, and Opportunities (by Otoritas Jasa Keuangan Institute).
Senior Executive Vice President	*Training* Keuangan Berkelanjutan: Integrasi *Govenance, Risk Management, and Compliance* dalam Penerapan *Environmental, Social, and Governance* (oleh Bank Victoria, Lembaga Pengembangan Perbankan Indonesia, dan Otoritas Jasa Keuangan Institute).	Sustainable Finance Training: Integration of Governance, Risk Management, and Compliance in the Implementation of Environmental, Social, and Governance (by Bank Victoria, Indonesian Banking Development Institute, and Financial Services Authority Institute).
Kepala Divisi/Wakil Kepala Divisi Head of Division/Deputy Head of Division	*Training* Keuangan Berkelanjutan: Integrasi *Govenance, Risk Management, and Compliance* dalam Penerapan *Environmental, Social, and Governance* (oleh Bank Victoria, Lembaga Pengembangan Perbankan Indonesia, dan Otoritas Jasa Keuangan Institute).	Sustainable Finance Training: Integration of Governance, Risk Management, and Compliance in the Implementation of Environmental, Social, and Governance (by Bank Victoria, Indonesian Banking Development Institute, and Financial Services Authority Institute).
Officer	*Workshop Pilot Project* Implementasi Taksonomi Hijau Indonesia (THI) Edisi 1.0 pada Pelaporan Bank melalui Aplikasi Apolo Modul Laporan Keuangan (oleh Otoritas Jasa Keuangan).	Pilot Project Workshop on the Implementation of Indonesian Green Taxonomy (THI) Edition 1.0 on Bank Reporting through Apolo Application Financial Statements Module (by the Financial Services Authority).

Pencapaian dan Biaya Pengembangan Kompetensi terkait Keuangan Berkelanjutan

Berikut informasi pencapaian dan biaya pengembangan kompetensi terkait keuangan berkelanjutan yang telah dikeluarkan Bank selama 3 (tiga) tahun terakhir:

Achievements and Costs of Competency Development related to Sustainable Finance

Below is information on the achievements and costs of competency development related to sustainable finance that have been issued by the Bank in the past 3 (three) years:

Uraian	2023	2022	2021	Description
Total Peserta (Orang)	43	86	69	Total Participants (People)
Biaya (Rp)	34,742,047	18,071,058	-	Cost (Rp)

Penilaian Risiko atas Penerapan Keuangan Berkelanjutan [POJK E.3]

Bank senantiasa mengevaluasi strategi manajemen risiko yang diterapkan terhadap visi, misi, serta strategi keberlanjutan yang dimiliki. Selain itu, Bank juga memperhatikan pencapaian target RAKB di tahun sebelumnya untuk dijadikan salah satu pertimbangan dalam perumusan strategi manajemen risiko keberlanjutan. Bank juga mempertimbangkan pencapaian target RAKB di tahun sebelumnya dalam perumusan strategi manajemen risiko keberlanjutan yang dimiliki. Upaya evaluasi dilakukan guna mewujudkan penerapan prinsip keuangan berkelanjutan yang efektif. Tidak hanya itu, manajemen risiko yang baik juga diperlukan guna menunjang transformasi digital yang memperhatikan prinsip kehati-hatian dan prinsip keuangan berkelanjutan.

Bank telah memiliki langkah-langkah mitigasi apabila terdapat pencapaian program yang tidak sesuai dengan target maupun lini waktu yang ditetapkan dalam RAKB, yakni:
1. Melakukan evaluasi program keuangan berkelanjutan yang telah dilaksanakan;
2. Melakukan konsultasi dengan pihak eksternal terkait kendala-kendala yang dihadapi dan/atau dapat terjadi atas program RAKB; serta
3. Mengkaji ulang indikator kinerja yang digunakan untuk tahun-tahun berikutnya, berdasarkan realisasi program keuangan berkelanjutan yang telah dilaksanakan.

Risk Assessment of Sustainable Finance Implementation [POJK E.3]

The Bank constantly evaluates the risk management strategy implemented against its vision, mission, and sustainability strategy. In addition, the Bank also pays attention to the achievement of RAKB targets in the previous year to be used as one of the considerations in formulating a sustainable risk management strategy. The Bank also considers the achievement of RAKB targets in the previous year in formulating its own sustainable risk management strategy. Evaluation efforts are carried out to realize the effective application of sustainable finance principles. Not only that, good risk management is also needed to support digital transformation with due observance to the principles of prudence and principles of sustainable finance.

The Bank already has mitigation measures in place if there are program achievements that do not align with the targets or timeline determined in the RAKB, namely:
1. To evaluate sustainable finance programs that have been carried out;
2. To consult external parties related to the constraints faced and/or that might happen due to the RAKB programs; and
3. To re-assess the performance indicators used in the following years, based on the realization of sustainable finance programs carried out.

Keberlanjutan Kinerja Ekonomi
Economic Performance Sustainability

Kinerja Operasional dan Keuangan
[POJK F.2] [POJK F.3]

Keberlangsungan usaha Bank dapat diukur melalui pencapaian kinerja ekonomi yang melibatkan aspek operasional dan keuangan. Oleh karenanya, Bank terus berusaha menjaga dan meningkatkan kinerja operasional serta keuangan untuk mencapai target yang telah ditetapkan. Berikut informasi pencapaian Bank Victoria dalam 3 (tiga) tahun terakhir:

Operational and Financial Performance
[POJK F.2] [POJK F.3]

The Bank's business sustainability can be measured through the achievement of economic performance which involves operational and financial aspects. Therefore, the Bank strives to maintain and improve the operational and financial performance to achieve the predetermined targets. Information about Bank Victoria's achievements in the past 3 (three) years is as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian	2023		2022*	2021	Description
	Target	Realisasi Realization			
KINERJA KEUANGAN / FINANCIAL PERFORMANCE					
Total Aset	27,869	29,624	25,932	23,660	Total Assets
Total Liabilitas	23,956	25,799	22,232	20,649	Total Liabilities
Total Ekuitas	3,913	3,825	3,700	3,011	Total Equity
Pendapatan Bunga – Bersih	601	579	699	418	Interest Income – Net
Pendapatan (Beban) Operasional selain Bunga – Bersih	238	(405)	266	(513)	Operating Income (Expenses) other than Interest – Net
Laba (Rugi) Operasional	285	174	414	(95)	Income (Loss) from Operations
Laba (Rugi) Tahun Berjalan	166	102	226	(119)	Profit (Loss) for the Year
KINERJA OPERASIONAL / OPERATIONAL PERFORMANCE					
Total Produk Simpanan	21,050	22,429	19,372	18,085	Total Deposits Products
Total Produk Pinjaman	17,813	18,629	15,825	14,683	Total Loan Products
Total Pembiayaan terhadap Kegiatan Usaha Berkelanjutan (dalam miliar)	+ 50	504	444	472	Total Financing for Sustainable Business Activities (in billion)

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022. / * Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Nilai Ekonomi Langsung yang Dihasilkan dan Didistribusikan

Bank berkomitmen memberikan manfaat kepada pemangku kepentingan melalui distribusi nilai ekonomi di setiap tahunnya. Berikut pencapaian dan distribusi nilai ekonomi langsung Bank dalam 3 (tiga) tahun terakhir:

Direct Economic Value Generated and Distributed

The Bank is committed to providing benefits to stakeholders through the distribution of economic value annually. The following are the achievements and distribution of the Bank's direct economic value in the past 3 (three) years:

(dalam juta Rupiah / in million Rupiah)

Uraian	2023	2022*	2021*	Description
NILAI EKONOMI LANGSUNG YANG DIHASILKAN / DIRECT ECONOMIC VALUES GENERATED				
Penerimaan dari Pendapatan Bunga dan Syariah dan Komisi	1,866,455	1,585,072	1,402,170	Receipt from Interest and Sharia Income and Commissions
Penerimaan dari Operasional Lainnya	253,716	363,011	487,523	Receipt from Other Operating Income
Penerimaan dari Penjualan Agunan yang Diambil Alih	385,438	14,101	182,231	Receipt from Sale of Foreclosed Assets
Pendapatan Non-Operasional Lainnya	3,871	-	8,726	Other Non-Operating Income
Kenaikan dalam Aset Operasi	-	-	-	Increase in Operating Assets
Kenaikan dalam Kewajiban Operasi	3,256,073	1,870,146	-	Increase in Operating Liabilities
Hasil Penjualan Aset Tetap	45,396	17,287	21,815	Proceeds from Sale of Fixed Assets
Total	**5,464,055**	**3,849,618**	**1,995,086**	**Total**
NILAI EKONOMI YANG DIDISTRIBUSIKAN / DISTRIBUTED ECONOMIC VALUE				
Pembayaran Bunga dan Syariah	1,241,690	936,210	1,114,885	Payment of Interest and Sharia Expense
Pembayaran Beban Umum dan Administrasi	135,298	118,617	110,607	Payment of General and Administrative Expenses
Pembayaran Beban Tenaga Kerja	161,897	132,900	158,002	Payment of Personnel Expenses
Pembayaran Beban Operasional Lainnya	128,943	62,434	141,685	Payments of Other Operating Expenses

(dalam juta Rupiah / in million Rupiah)

Uraian	2023	2022*	2021*	Description
Pembayaran Non-Operasional Lainnya	-	28,898	-	Payment of Other Non-Operating Income
Pembayaran Pajak Penghasilan	16,049	-	-	Payment of Income Tax
Penurunan dalam Aset Operasi	2,802,368	1,496,221	1,301,360	Decrease in Operating Assets
Penurunan dalam Kewajiban Operasi	-	-	1,429,092	Decrease in Operating Liabilities
Pembelian Aset Tetap	16,196	7,527	1,119	Purchase of Fixed Assets
Pembelian Aset Tak Berwujud	7,289	1,880	984	Purchase of Intangible Assets
Pembayaran Sewa	10,757	10,959	10,943	Payment of Lease
Biaya Investasi Sosial	180	238	643	Social Investment Cost
Total	**4,520,667**	**2,795,883**	**4,339,910**	**Total**
Nilai Ekonomi yang Ditahan	**943,388**	**1,053,735**	**(2,237,247)**	**Economic Value Retained**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / * Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Mendukung Pertumbuhan Perekonomian Indonesia

Bank Victoria berkontribusi pada pembangunan ekonomi nasional dengan menyalurkan kredit ke berbagai sektor usaha. Berikut informasi tentang pencapaian penyaluran kredit Bank berdasarkan sektor ekonomi selama 3 (tiga) tahun terakhir:

Supporting Indonesia's Economic Growth

Bank Victoria contributes to the national economic development by lending to various business sectors. The following is information about the Bank's lending achievements based on economic sector over the last 3 (three) years:

(dalam juta Rupiah, kecuali dinyatakan lain / in million Rupiah, unless stated otherwise)

Uraian Description	2023		2022*		2021	
	Jumlah Total	Komposisi Composition (%)	Jumlah Total	Komposisi Composition (%)	Jumlah Total	Komposisi Composition (%)
Lembaga Pembiayaan Financing Institution	5,563,012	29.86	3,810,285	24.08	3,013,384	20.52
Perdagangan, Restoran, dan Hotel Trading, Restaurant, and Hotel	3,574,240	19.19	3,471,734	21.94	3,435,922	23.40
Industri Industry	2,186,357	11.74	1,546,407	9.77	1,565,012	10.66
Real Estat Real Estate	2,533,799	13.60	2,434,559	15.38	2,572,483	17.52
Konstruksi Construction	852,268	4.58	782,272	4.94	1,104,130	7.52
Jasa-Jasa Sosial/Masyarakat Social/Community Services	349,351	1.88	423,151	2.67	506,249	3.45
Lain-Lain Others	3,569,716	19.16	3,356,203	21.21	2,485,925	16.93
Total	**18,628,743**	**100.00**	**15,824,611**	**100.00**	**14,683,105**	**100.00**

* Konsolidasian sampai dengan divestasi Entitas Anak pada tanggal 22 Desember 2022 / * Consolidation until the date of divestment of Subsidiary on 22 December 2022.

Bank Victoria tidak hanya berfokus terhadap pembangunan ekonomi nasional melalui penyaluran kredit ke berbagai sektor usaha, tetapi juga mewujudkannya melalui penyaluran kredit kepada sektor Usaha Mikro, Kecil, dan Menengah (UMKM) yang memiliki kontribusi signifikan terhadap perekonomian nasional. Berikut informasi mengenai penyaluran kredit Bank kepada UMKM:

Bank Victoria not only focuses on national economic development through lending to various business sectors, but also makes this happen through lending to the Micro, Small, and Medium Enterprises (MSME) sector which has a significant contribution to the national economy. The following is information regarding the Bank's lending to MSME:

(dalam juta Rupiah, kecuali dinyatakan lain / / in million Rupiah, unless stated otherwise)

Uraian Description	2023		2022		2021	
	Jumlah Total	Komposisi Composition (%)	Jumlah Total	Komposisi Composition (%)	Jumlah Total	Komposisi Composition (%)
Usaha Mikro Micro Business	-	-	-	-	-	-
Usaha Kecil Small Business	16,499	0.54	20,696	0.85	28,950	1.44
Usaha Menengah Medium Business	3,037,478	99.46	2,424,657	99.15	1,985,229	98.56
Total	3,053,977	100.00	**2,445,354**	**100.00**	**2,014,179**	**100.00**

Pembiayaan terhadap Kegiatan Usaha Berkelanjutan [POJK F.3]

Bank Victoria berperan dalam menerapkan prinsip keuangan berkelanjutan dengan memberikan pembiayaan kepada kegiatan usaha berkelanjutan, Bank mendukung 4 (empat) dari 12 (dua belas) kategori kegiatan usaha berkelanjutan. Komitmen tersebut tercermin dalam peningkatan jumlah pembiayaan yang disalurkan kepada debitur yang ditunjukkan sebagai berikut:

Financing for Sustainable Business Activities [POJK F.3]

Bank Victoria plays a role in implementing sustainable finance principles by providing financing for sustainable business activities. The Bank supports 4 (four) of the 12 (twelve) categories of sustainable business activities. This commitment is reflected in the increase in financing amount distributed to debtors, which is shown as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian Description	Penyaluran Kredit Loans			Business Activities
	2023	2021	2021	
Pencegahan dan Pengendalian Polusi	219,043	108,375	88,765	Pollution Prevention and Control
Pengelolaan Sumber Daya Alam Hayati dan Penggunaan Lahan yang Berkelanjutan	173,182	393,548	374,526	Management of Biodiversity Resources and Sustainable Land Use
Kegiatan Usaha dan/atau Kegiatan Lain yang Berwawasan Lingkungan Lainnya	88,158	115,136	139,395	Eco-Friendly Business Activities and/or Other Activities
Kegiatan UMKM	3,053,977	2,445,354	2,014,179	MSME Activities
Total	3,534,360	**3,062,413**	**2,616,865**	**Total**

Literasi dan Inklusi Keuangan

Bank Victoria menyadari rendahnya pemahaman masyarakat terhadap layanan keuangan. Oleh karena itu, Bank mendukung upaya pemerintah dalam meningkatkan literasi dan inklusi keuangan yang bertujuan agar masyarakat lebih memahami produk dan jasa perbankan beserta manfaatnya.

Tahapan implementasi program literasi dan inklusi keuangan diuraikan sebagai berikut:

1. Perencanaan dan Persiapan
   Penyampaian materi dan pengajaran dilakukan oleh tenaga ahli yang telah memperoleh pelatihan dan penyuluhan, serta menguasai program. Guna mempermudah pemahaman peserta edukasi, Bank menyiapkan materi yang akan disampaikan dengan dilengkapi video yang memuat referensi

Financial Literacy and Inclusion

Bank Victoria is aware of the low public understanding of financial services. As such, the Bank supports the government's initiative in improving financial literacy and inclusion to help the community better understand banking products and services and their benefits.

The implementation stages for the financial literacy and inclusion program are described as follows:

1. Planning and Preparation
   Materials and education are taught by experts who have obtained trainings and developments, and understood the program. To facilitate the participants' understanding, the Bank prepares materials to be delivered, supported with videos containing references of clear audio visual. This

audio-visual yang jernih. Materi ini dilengkapi dengan beberapa lagu anak terkait "Ayo Menabung" untuk lebih menarik minat para siswa dalam mengikuti program, serta menyiapkan *link* Zoom yang akan digunakan apabila edukasi dan literasi tersebut dilakukan secara virtual.

2. Pencapaian Tujuan yang Telah Ditetapkan
   Lokasi pelaksanaan program disesuaikan dengan wilayah kantor cabang utama dan kantor cabang pembantu dengan pertimbangan kedekatan jarak guna mempermudah koordinasi antar pihak. Program ini diharapkan dapat menjadi media edukasi, khususnya bagi kalangan ibu-ibu, untuk dapat melakukan perencanaan keuangan rumah tangga menjadi lebih baik lagi, sedangkan, bagi para murid tingkat SD, SMP, dan SMA, program ini diharapkan mampu meningkatkan pemahaman seputar manfaat dan kegunaan menabung sejak dini.
3. Pelaksanaan Strategi dan Kebijakan
   Pelaksanaan program literasi keuangan dilakukan secara berkala sesuai dengan tahapan implementasi berikut:
   a. *Pre-test* dilakukan untuk mengetahui pemahaman awal peserta sebelum mengikuti program. Pengukuran dilakukan dengan memberikan 17 pertanyaan yang berhubungan dengan pengetahuan dan pengertian terkait materi yang diberikan kepada peserta program;
   b. Setelah didapatkan hasil *pre-test*, pemateri yang berasal dari Bank Victoria akan memberikan edukasi interaktif dan komunikatif yang memungkinkan peserta untuk bertanya dan memberikan pendapat secara langsung; dan
   c. Untuk mengetahui pemahaman peserta setelah mengikuti program, dilaksanakan *post-test* yang berisi pertanyaan serupa pada saat *pre-test*. Tes ini akan mengukur perkembangan pemahaman peserta setelah mengikuti program dan mengukur tingkat keberhasilan pelaksanaan program.

   Pre-test dan *post-test* juga dapat dilakukan secara virtual dengan menggunakan aplikasi terpisah dari *link* Zoom yang digunakan pada saat pemberian materi.
4. Evaluasi Kendala yang Dihadapi dan Upaya-Upaya Pemecahan Masalah
   Kendala yang dihadapi Bank dalam meyakinkan para peserta untuk mengikuti program, di antaranya:
   a. Keterbatasan waktu yang berimbas pada pemahaman mengenai pentingnya perencanaan keuangan rumah tangga;
   b. Sekolah swasta yang menjadi salah satu sasaran, mempunyai kebijakan tersendiri sehingga tidak dapat melakukan program di sekolah tersebut;
   c. Adanya keterbatasan kuota internet untuk para pelajar; serta
   d. Tidak semua kalangan ibu rumah tangga mempunyai dan memahami pemakaian aplikasi Zoom manakala dilakukan secara virtual.

   Bank berhasil mengatasi kendala-kendala tersebut melalui pendekatan terhadap koordinator kelompok peserta edukasi serta pihak terkait lainnya hingga terselenggaranya program dengan baik, sesuai dengan target yang diinginkan.

material is complemented by several children songs related to "*Ayo Menabung*" (Let's Save Money) in order to encourage students to participate in the program, and prepared with links for Zoom meeting to be used in the educational and literacy program, virtually.

2. Achievement of the Predetermined Goals
   The location to hold the program is adjusted to the area of main branch offices and sub-branch offices by considering the proximity to facilitate coordination between parties. This program is expected to be an educational medium, especially for housewives, to be able to better plan their household finance in the future, meanwhile, for elementary, junior high, and high school students, this program is expected to increase their understanding regarding the benefits and advantages of saving money early.
3. Implementation of Strategies and Policies
   The financial literacy program is implemented periodically in accordance with the following implementation phases:
   a. Pre-test is conducted to know participants' initial understanding of the program. It is measured by giving 17 pre-test questions related to the knowledge and understanding related of the materials delivered to the program participants;
   b. Upon obtaining the pre-test's results, the speaker who is from Bank Victoria's internal will provide interactive and communicative education to encourage the participants to directly raise questions and express opinions; and
   c. To understand participant knowledge after participating in the program, a post-test is given. This is intended to measure the participants' improved understanding after the program, and to measure the success of the program implementation.

   Pre-test and post-test can also be conducted virtually using separate application from Zoom links used during the material delivery.
4. Evaluation of Obstacles Encountered and Problem-Solving Measures
   Obstacles encountered by the Bank in convincing participants to participate in the program among others:
   a. Limited time which impacts on the understanding regarding the importance of household financial planning;
   b. Private schools, which are one of the targets have their own discretions, and therefore, the program cannot be held in these schools;
   c. Limited internet quota for students; and
   d. Not all housewives have the equipment and knowledge on how to use Zoom application when the program is held virtually.

   The Bank managed to deal with these obstacles through an approach to the coordinators of group of participants and relevant parties so that the program was implemented properly, according to the required target.

Pelaksanaan Program Literasi dan Inklusi Keuangan

Selama tahun 2023, Bank melaksanakan sejumlah program literasi dan inklusi keuangan sebagai berikut:

1. Edukasi Ayo ke Bank di Sekolah MI Nurul Akhyar Bekasi dengan peserta pelajar kelas 2 (dua) SD sebanyak 40 (empat puluh) orang;
2. Edukasi Ayo ke Bank di SDN 03 PCU Tangerang Selatan dengan peserta pelajar kelas 6 (enam) SD sebanyak 40 (empat puluh) orang;
3. Edukasi Ayo ke Bank di Sekolah Surya Dharma Kebayoran Lama, Jakarta dengan peserta pelajar kelas 1 (satu) sampai 6 (enam) SD sebanyak 63 (enam puluh tiga) orang;
4. Edukasi Ayo ke Bank di SDIT ABA Abdurrahman Bin Auf Bekasi dengan peserta pelajar kelas 4 (empat) SD sebanyak 59 (lima puluh sembilan) orang; dan
5. Edukasi Ayo ke Bank di Sekolah Mutiara Persada Primary School Solo, Jawa Tengah dengan peserta pelajar SD sebanyak 20 (dua puluh orang) orang.

Implementation of Financial Literacy and Inclusion Program

Throughout 2023, the Bank conducted a number of financial literacy and inclusion programs as follows:

1. Education of Let's Go to Bank at MI Nurul Akhyar Bekasi School with 40 (forty) elementary school grade 2 (two) students participating;
2. Education of Let's Go to Bank at 03 PCU South Tangerang School with 40 (forty) elementary school grade 6 (six) students participating;
3. Education of Let's Go to Bank at Surya Dharma School Kebayoran Lama, Jakarta, with 63 (sixty three) elementary school students from grade 1 (first) to grade 6 (six);
4. Education of Let's Go to Bank at ABA Abdurrahman Bin Auf Bekasi School with 59 (fifty nine) elementary school grade 4 (four) students participating; and
5. Education of Let's Go to Bank at Mutiara Persada Primary School Solo, Central Java, with 20 (twenty) elementary school students participating.

Keberlanjutan Kinerja Sosial
Social Performance Sustainability

Komitmen Pelayanan Terbaik bagi Nasabah [POJK F.17]

Keberlangsungan usaha Bank Victoria sangat dipengaruhi oleh kepercayaan dan kepuasan nasabah. Bank mempertahankan hal tersebut melalui pelayanan terbaik, layanan setara, aman, mudah dijangkau, dan dapat dipercaya, sesuai dengan Surat Keputusan Direksi No. 041/SK-DIR/07/14 tentang Kebijakan dan Prosedur Kualitas Pelayanan Nasabah (*Customer Experience*). Kebijakan ini sekaligus menjadi panduan dalam Standar Pelayanan Nasabah Bank Victoria.

Manfaat dari Produk dan Layanan yang Diberikan [POJK F.28]

Bank hadir untuk membantu nasabah individu dan korporasi dalam memenuhi kebutuhan transaksi ekonomi melalui produk simpanan dan pinjaman. Bank juga mendukung kebutuhan keuangan pendukung lainnya melalui produk investasi, layanan bank devisa, dan jasa layanan lainnya.

Di sisi lain, identifikasi dampak negatif produk dan layanan Bank adalah adanya risiko sosial dan lingkungan hidup pada penyaluran kredit. Risiko sosial, Bank mengidentifikasi adanya potensi tenaga

Commitment to the Best Service for Customers [POJK F.17]

Bank Victoria's business sustainability is greatly influenced by customer trust and satisfaction. The Bank maintains such trust and satisfaction through the best services, equal, safe, easy to reach, and trustworthy service, in accordance with Board of Directors' Decision Letter No. 041/SK-DIR/07/14 on Policies and Procedures for Customer Services Quality (Customer Experience). These policies also serve as the guidelines to Customer Service Standards implemented by Bank Victoria.

Benefits of Products and Services Provided [POJK F.28]

The Bank presents to help individual and corporate customers meet their economic transaction needs through savings and loan products. The Bank also supports other financial support needs through investment products, foreign exchange banking services, and other services.

On the other side, the identification of negative impacts of Bank products and services is the existence of social and environmental risks in lending. Social risk, the Bank identifies the potential for

kerja di bawah umur, pemberian upah di bawah upah minimum, atau risiko pelanggaran hak asasi manusia pada jenis usaha industri padat karya. Mengatasi risiko ini, Bank memberlakukan persyaratan kredit dengan ketat dan meningkatkan pengawasan survei lapangan. Risiko lingkungan hidup, Bank mengidentifikasi adanya potensi deforestasi, kebakaran hutan dan lahan, dan risiko perubahan cuaca. Semua risiko ini merupakan ancaman pada degradasi lingkungan pada pembiayaan di sektor berbasis lahan. Oleh karenanya, Bank mensyaratkan dokumen AMDAL bagi (calon) debitur yang mengelola lahan dengan luas 25 hektare atau lebih sebagai syarat pengajuan kredit.

Inovasi dan Pengembangan Produk dan Jasa
[POJK F.26]

Selama tahun 2023, Bank telah melakukan inovasi dan pengembangan produk dan jasa yang diuraikan sebagai berikut:

1. Pengembangan program tabungan berhadiah langsung, yaitu program tabungan Victoria Reward;
2. Pengembangan program tabungan berhadiah *voucher*, yaitu program tabungan Imlek 8; dan
3. Pengembangan program tabungan berhadiah logam mulia, yaitu tabungan V-Gold.

Program Peningkatan Kualitas Layanan

Bank Victoria senantiasa melaksanakan berbagai program untuk memberikan kepuasan kepada setiap nasabah, antara lain:

1. Menyusun standar *service excellence* bagi seluruh kantor cabang sesuai dengan tuntutan dan harapan nasabah;
2. Melaksanakan dan memantau kegiatan *service excellence* secara konsisten di kantor cabang;
3. Menetapkan standar *zero defect* dalam operasional transaksi perbankan;
4. Melakukan pelatihan dan pengembangan *service excellence* bagi pegawai *frontliner* di seluruh kantor cabang Bank;
5. Menggunakan kartu ATM berbasis *chip card* untuk mendukung peningkatan keamanan nasabah; serta
6. Mengembangkan sistem kliring nasional (SKN) dan *real time gross settlement* (RTGS) Generasi II untuk fitur *bulk payment* (*kliring one to many transfer*), menyediakan *internet banking* dan *mobile banking* untuk kenyamanan bertransaksi bagi nasabah, serta memperbaiki tampilan situs web Bank menjadi lebih interaktif agar lebih mudah dipahami oleh pengguna.

Keamanan Simpanan dan Kerahasiaan Data Nasabah

Bank Victoria memberikan rasa aman kepada nasabah dengan menjamin perlindungan atas uang yang disimpan melalui Lembaga Penjamin Simpanan sesuai Undang-Undang No. 24 Tahun 2004 tentang Lembaga Penjamin Simpanan. Bank juga berkomitmen menjaga kerahasiaan data nasabah sebagai bentuk responsibilitas dalam dunia perbankan.

underage workers, wage provision below the minimum wage, or the risk of human rights violations in labor-intensive industrial business. Addressing this risk, the Bank enforces strict terms of loans and increases field survey supervision. Environmental risk, the Bank identifies the potential for deforestation, forest and land fires, and the risk of weather changes. All of such risks pose a threat to environmental degradation in financing in the land-based sector. Therefore, the Bank requires an AMDAL document for (potential) debtor who manages land of 25 hectares or more as a requirement in applying loan.

Product and Service Innovation and Development
[POJK F.26]

Throughout 2023, the Bank carried out innovation and development of products and services, described as follows:

1. Development of a savings program with direct prize, namely Victoria Reward savings program;
2. Development of a savings program with voucher prize, namely Chinese New Year 8 savings program; and
3. Development of savings program with precious metal prize, namely V-Gold savings.

Services Quality Improvement Program

Bank Victoria always implements various programs to provide satisfaction to every customer, including:

1. Developing service excellence standards that meet customer demands and expectations for all the Bank's branch offices;
2. Consistently running and monitoring service excellence activities at branch offices;
3. Establishing zero-defect standard in banking transaction operations;
4. Conducting employee training and development of service excellence for all frontline staffs of the Bank's branch offices;
5. Utilizing chip-based ATM cards to enhance customer security; and
6. Developing the national clearing system (SKN) and real time gross settlement (RTGS) Generation II to support bulk payment feature (one-to-many transfer clearing), providing internet banking and mobile banking for customers' transaction convenience, and improving the Bank's website display to be more interactive and user friendly.

Customer Deposit Security and Data Confidentiality

Bank Victoria provides a sense of security to customers by guaranteeing protection for the money deposited through the Deposit Insurance Agency pursuant to Law No. 24 of 2004 on Indonesia Deposit Insurance Agency. The Bank is also committed to maintaining the confidentiality of customer data as a form of responsibility in the banking world.

Keamanan Bertransaksi
Transaction Security



Simpan Kartu ATM / Keep the ATM Card

Kartu ATM adalah akses termudah menuju dana yang ada di rekening anda, untuk itu pastikan kartu ATM anda tersimpan dengan baik dan tidak dipinjamkan kepada orang lain.
ATM card is the easiest access to your account, so make sure your ATM card is kept properly and do not lend it to other people.



PIN dan *Password* Milik Pribadi / PIN and Password are Personal

Pelaksanaan penilaian *peer evaluation* dilakukan oleh setiap anggota Dewan Komisaris terhadap anggota Dewan Komisaris lainnya.
The peer evaluation assessment is conducted by each member of the Board of Commissioners against other members of the Board of Commissioners.



Tidak Menandatangani Dokumen Kosong / Not Signing Blank Documents

Dalam kondisi apapun, jangan pernah menandatangani formulir/slip kosong. Pastikan seluruh informasi di formulir/slip kosong sudah benar dan sesuai dengan kebutuhan anda.
Under no circumstances should you sign a blank form/slip. Make sure that all information on the blank form/slip is correct and fit to your needs.



Gunakan *Internet Banking* dan *Mobile Banking* / Use Internet Banking and Mobile Banking

Aktifkan fasilitas *Internet Banking* dan *Mobile Banking* (IBMB) anda, selain memudahkan transaksi perbankan, dengan IBMB anda dapat selalu memonitor rekening secara tepat waktu.
Activate your Internet Banking and Mobile Banking (IBMB) facilities. In addition to facilitating banking transactions, IBMB can always help monitor your accounts in a timely manner.



Rutin Cek Saldo / Regularly Check Your Balance

Lakukan pengecekan saldo anda secara berkala. Jika anda menemukan transaksi mencurigakan segera hubungi *Call Center* untuk meminta penjelasan. Cek saldo dapat dilakukan melalui layanan *Call Center,* IBMB, ATM, dan print buku tabungan di kantor cabang terdekat.
Check your balance regularly. If you find a suspicious transaction, immediately contact the Call Center to ask for explanation. Balance checking can be done through Call Center, IBMB, ATM services, and print the bank passbook at the nearest branch office.

Komitmen untuk memberikan keamanan bagi nasabah dilakukan dengan mengacu kepada peraturan terkait, antara lain:
1. Undang-Undang No. 7 Tahun 1992 tentang Perbankan, dan perubahannya dalam Undang-Undang No. 10 Tahun 1998;
2. Undang-Undang No. 4 Tahun 2023 tentang Pengembangan dan Penguatan Sektor Keuangan;
3. Peraturan Bank Indonesia No. 2/19/PBI/2000 tentang Persyaratan dan Tata Cara Pemberian Perintah atau Izin Tertulis Membuka Rahasia Bank; serta
4. Peraturan Otoritas Jasa Keuangan No. 1/POJK.07/2013 tentang Perlindungan Konsumen Sektor Jasa, dan peraturan turunannya.

Berdasarkan peraturan tersebut, Bank wajib untuk merahasiakan keterangan mengenai nasabah, baik penyimpan maupun simpanannya, kecuali dalam beberapa hal yang dipersyaratkan dalam undang-undang.

Program Keterikatan Nasabah

Bank Victoria secara rutin menyelenggarakan program keterikatan untuk memperkuat hubungan dengan nasabah. Program yang telah dilaksanakan yaitu:
1. Program tabungan nasabah berhadiah langsung;
2. Program pemberian hadiah kue pada ulang tahun nasabah (*loyalty program*); dan
3. Program *customer gathering* bersama dengan Direksi.

Commitment to providing customers security is reflected by referring to the applicable regulations, among others:
1. Law No. 7 of 1992 on Banking, and its amendments in Law No. 10 of 1998;
2. Law No. 4 of 2023 on Financial Sector Development and Strengthening;
3. Bank Indonesia Regulation No. 2/19/PBI/2000 on Requirements and Procedures for Giving Order or Written Permission to Disclose Banking Information; and
4. Financial Services Authority Regulation No. 1/POJK.07/2013 on Consumer Protection of Services Sector, and its derivative regulations.

Based on such regulations, the Bank is required to keep confidential all information regarding the customers, both who deposit their money and their deposited money, with exception to the matters as required by law.

Customer Engagement Program

Bank Victoria regularly organizes engagement program to strengthen relationship with customers. The programs carried out are:
1. Customer savings program with direct prizes;
2. Birthday cake-giving program for customers on their birthdays (loyalty program); and
3. Customer gathering program with the Board of Directors.

Evaluasi Produk dan Jasa
[POJK F.27] [POJK F.29]

Sebelum produk dan layanan Bank disampaikan kepada nasabah, produk dan layanan Bank telah mendapat izin dari Bank Indonesia. Selanjutnya, Bank terus melakukan tinjauan ulang dan evaluasi sebagai salah satu bentuk mitigasi risiko terhadap penerbitan produk dan layanan baru. Prosedur tinjauan ulang dan evaluasi dijalankan untuk memastikan proses peluncuran produk dan layanan telah diterapkan sesuai dengan pengajuan usulan yang disetujui oleh manajemen dan memastikan seluruh produk dan layanan baru aman bagi nasabah.

Pada tahun 2023, seluruh (100%) produk dan layanan Bank telah dievaluasi. Selain itu, dari hasil tinjauan ulang dan evaluasi yang dilakukan secara berkala tersebut, hingga akhir tahun 2023, Bank memastikan tidak ada produk dan/atau jasa keuangan Bank yang dinyatakan bermasalah dan harus ditarik kembali oleh Bank Indonesia.

Evaluation of Products and Services
[POJK F.27] [POJK F.29]

Before the Bank's products and services are delivered to customers, such products and services have received permission from Bank Indonesia. Furthermore, the Bank constantly conducts review and evaluation as a form of risk mitigation regarding the issuance of new products and services. Review and evaluation procedures are carried out to ensure that the product and service launching process is implemented in accordance with the proposed proposals approved by the management and to ensure that all new products and services are safe for customers.

In 2023, all (100%) of the Bank's products and services were evaluated. In addition, from the results of reviews and evaluations carried out periodically, until the end of 2023, the Bank ensured that no Bank financial products and/or services were declared problematic and must be withdrawn by Bank Indonesia.

Survei Kepuasan Nasabah [POJK F.30]
Bank Victoria terus meningkatkan kualitas produk dan layanan untuk memastikan kepuasan nasabah. Pengukuran kualitas dilakukan melalui survei kepuasan nasabah yang dilaksanakan setiap semester/awal periode triwulan 1 (satu) dan triwulan 3 (tiga) di masing-masing kantor cabang. Kemudian, hasilnya akan dikumpulkan di kantor pusat untuk proses evaluasi akhir. Hasil survei ini menjadi dasar evaluasi dan peningkatan kualitas produk dan layanan. Berikut hasil survei kepuasan nasabah Bank selama 3 (tiga) tahun terakhir:

Customer Satisfaction Survey [POJK F.30]
Bank Victoria continues to improve product and service quality to ensure customer satisfaction. Quality measurement is carried out through customer satisfaction survey conducted every semester/beginning of the 1st (first) and 3rd (third) quarter periods at each branch office. Then, the results will be collected at the head office for the final evaluation process. The survey results serve as the basis for evaluating and improving the quality of products and services. The results of the Bank's customer satisfaction survey in the past 3 (three) years are as follows:

Indikator	2023	2022	2021	Indicator
Teller (Grooming, Behavior, Skill, and Product Knowledge)	90	85	80	Teller (Grooming, Behavior, Skill, and Product Knowledge)
Customer Service (Behavior, Skill, Product Knowledge, and Cross Selling)	90	85	80	Customer Service (Behavior, Skill, Product Knowledge, and Cross Selling)
Security (Grooming, Behavior, Skill, and Product Knowledge)	90	85	80	Security (Grooming, Behavior, Skill, and Product Knowledge)
Eksterior dan Interior Kantor Cabang	75	75	75	Exterior and Interior of Branch Offices
Rata-Rata Hasil	86.25	82.50	78.75	**Average Results**
Kategori	Baik good	Baik good	Baik good	**Category**

Sarana Pengaduan Nasabah
Bank Victoria menyediakan sarana pengaduan bagi nasabah melalui sistem *online* yang dikelola oleh Direktorat Operasional. Nasabah dapat melaporkan keluhan terkait produk dan layanan melalui berbagai saluran, termasuk *Call Center* 24 jam (1500977), *e-mail* (customercare@victoriabank.co.id), *Customer Service* di kantor cabang, dan aplikasi di *Playstore* maupun *Appstore* pada *smartphone*. Sistem ini memungkinkan nasabah untuk menyampaikan keluhan dan memeriksa status penyelesaiannya di seluruh kantor cabang Bank Victoria.

Customer Complaint Channel
Bank Victoria provides a complaint channel for customers through an online system managed by the Operational Directorate. Customers can report complaints regarding products and services through various channels, including the 24-hour Call Center (1500977), email (customercare@victoriabank.co.id), Customer Service at branch offices, and application on Playstore and Appstore on smartphones. This system allows customers to submit complaints and to check their complaint status at all Bank Victoria's branch offices.

Selain itu, dalam menangani laporan pengaduan, Bank memeriksa kebenaran setiap laporan dan berkomitmen menyelesaikannya dengan tegas dan tepat waktu sesuai dengan *Standar Service Level Agreement* (SLA). Informasi jumlah pengaduan yang diterima dan ditindaklanjuti oleh Bank Victoria selama 3 (tiga) tahun terakhir ditunjukkan sebagai berikut:

Furthermore, in handling complaints reports, the Bank checks the validity of every report and is committed to strictly settling it in a timely manner according to the Standard Service Level Agreement (SLA). Information on complaints received and followed-up by Bank Victoria in the last 3 (three) years is as follows:

Jenis Pengaduan Type of Complaint	2023			2022		2021	
	Jumlah Keluhan Total Complaint	Selesai Settled	Sedang Ditindaklanjuti On Follow Up	Jumlah Keluhan Total Complaint	Selesai Settled	Jumlah Keluhan Total Complaint	Selesai Settled
ATM	113	113	-	108	108	90	90
Internet/Mobile Banking	405	405	-	762	762	570	570
Internet Banking Business	11	11	-	4	4	6	6
Tabungan Savings Account	1	1	-	1	1	1	1
Deposito Time Deposits	-	-	-	-	-	1	1
EDC	5	5	-	2	2	-	-
Kredit Loans	2	2	-	1	1	2	2
Total	**537**	**537**	**-**	**878**	**878**	**670**	**670**

Pengelolaan *Human Capital* yang Berkualitas

Bank Victoria menekankan pentingnya keberadaan *Human Capital* (HC) yang kompeten dalam memberikan nilai tambah bagi layanan kepada nasabah di tengah persaingan industri perbankan yang semakin ketat. Bank secara konsisten mengelola HC dengan bertanggung jawab, adil, dan terarah yang selaras dengan strategi Bank dan perkembangan industri perbankan saat ini. Komitmen Bank juga terlihat dalam memastikan pemenuhan hak-hak HC sesuai dengan kebijakan dan peraturan perundang-undangan yang berlaku.

Kebijakan Pengelolaan *Human Capital*

Bank Victoria telah menetapkan pedoman pengelolaan HC yang dituangkan dalam Kebijakan *Human Capital Management* yang disahkan serta dimutakhirkan berdasarkan Surat Keputusan Direksi No. 001A/SK-DIR/12/22 tanggal 1 Desember 2022 tentang Kebijakan *Human Capital Management* dan Surat Keputusan Direksi yang telah disahkan serta dimutakhirkan berdasarkan Surat Keputusan Direksi No. 001B/SK-DIR/12/22 tanggal 1 Desember 2022 tentang Standar Operasional Prosedur *Human Capital Management*.

Selain itu, Bank berusaha menciptakan hubungan industrial yang berkualitas dan harmonis antara karyawan dengan Bank. Implementasinya didasarkan pada Surat Keputusan Direktur

Quality Human Capital Management

Bank Victoria emphasizes the importance of having competent Human Capital (HC) in providing added values for services to customers amid the increasingly tough competition in the banking industry. The Bank consistently manages HC in a responsible, fair, and directed manner, in line with the Bank's strategy and developments in the banking industry to date. The Bank's commitment is also reflected in ensuring the fulfillment of HC rights in accordance with the policies and applicable laws and regulations.

Human Capital Management Policy

Bank Victoria has established guidelines for HC management as outlined in the Human Capital Management Policies which have been approved and updated based on Board of Directors' Decision Letter No. 001A/SK-DIR/12/22 dated 1 December 2022 on Human Capital Management Policies and Board of Directors' Decision Letter which has been approved and updated based on the Board of Directors' Decision Letter No. 001B/SK-DIR/12/22 dated 1 December 2022 on Standard Operating Procedures for Human Capital Management.

Furthermore, the Bank strives to create quality and harmonious industrial relations between employees and the Bank. Its implementation is based on the Decree of the Director General

Jenderal Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep.4/HI.00.00/00.0000.230404006/B/VII/2023 tanggal 18 Juli 2023 tentang Pengesahan Peraturan Perusahaan PT Bank Victoria International Tbk. Bank secara berkala akan memperbarui Peraturan Perusahaan sesuai perkembangan ketentuan ketenagakerjaan.

Keberagaman di Bank Victoria

Setiap insan Bank memiliki latar belakang yang beragam. Oleh karenanya, Bank Victoria berkomitmen untuk memperlakukan seluruh karyawan dengan setara tanpa diskriminasi berdasarkan suku, ras, agama, atau gender yang bertujuan untuk menciptakan lingkungan kerja yang inklusif, memberikan rasa aman, dan kenyamanan bagi semua karyawan. Dengan pendekatan ini, Bank memberikan kesempatan yang sama bagi setiap karyawan untuk berkembang bersama Bank Victoria.

Hak Asasi Karyawan

Bank senantiasa menjunjung hak asasi setiap karyawan dengan menetapkan waktu kerja dan memberikan izin yang sepatutnya, sebagai berikut:

1. Bank menerapkan jam kerja yang proporsional sesuai dengan standar, serta menetapkan waktu kerja lembur dilengkapi fasilitas yang disesuaikan dengan kebutuhan operasional;
2. Setiap karyawan Bank Victoria diberikan izin untuk menjalankan ibadah sesuai dengan kepercayaan yang diyakini;
3. Karyawan Bank diizinkan untuk meninggalkan pekerjaan dengan tetap menerima gaji penuh karena:
   a. Peristiwa khusus, yaitu pernikahan karyawan, karyawan menikahkan anak, suami/istri/anak/menantu/orang tua/mertua/anggota dalam 1 (satu) rumah meninggal dunia, kelahiran anak, istri karyawan mengalami keguguran kandungan, khitanan anak, pembaptisan anak;
   b. Sakit, yaitu sakit dengan surat dokter, sakit tanpa surat dokter selama 1 (satu) hari dan sakit dengan rawat inap;
   c. Keperluan pribadi yang penting, mendadak, dan tidak dapat diwakilkan; serta
   d. Mengalami halangan di luar kemampuan karyawan.
4. Karyawan yang telah bekerja di Bank selama 1 (satu) tahun secara terus menerus dapat mengambil cuti tahunan dengan tetap menerima gaji penuh. Lamanya cuti tahunan diatur berdasarkan jabatan karyawan, berdasarkan ketentuan yang berlaku di Bank.

Kepatuhan terhadap Praktik Kerja tanpa Tenaga Kerja Anak dan Tenaga Kerja Paksa [POJK F.19]

Bank Victoria selalu patuh terhadap peraturan yang berlaku, khususnya dalam pengelolaan HC yang bertanggung jawab. Komitmen ini diwujudkan dengan anti kerja paksa dan penjaminan tidak adanya tenaga kerja di bawah umur (<18 tahun) di seluruh wilayah operasional Bank. Selain itu, Bank juga memberikan fasilitas bagi karyawan untuk berkumpul atau berserikat.

of Development of Industrial Relations and Social Security for Workers No. Kep.4/HI.00.00/00.0000.230404006/B/VII/2023 dated 18 July 2023 on Approval of Company Regulations of PT Bank Victoria International Tbk. The Bank will periodically update the Company Regulations in accordance with developments in employment provisions.

Diversity in Bank Victoria

Every person in the Bank has a diverse background. Therefore, Bank Victoria is committed to treating all employees equally without discrimination based on ethnicity, race, religion, or gender in order to create an inclusive work environment and provide a sense of security and comfort for all employees. With this approach, the Bank provides equal opportunity for every employee to develop with Bank Victoria.

Employee's Human Right

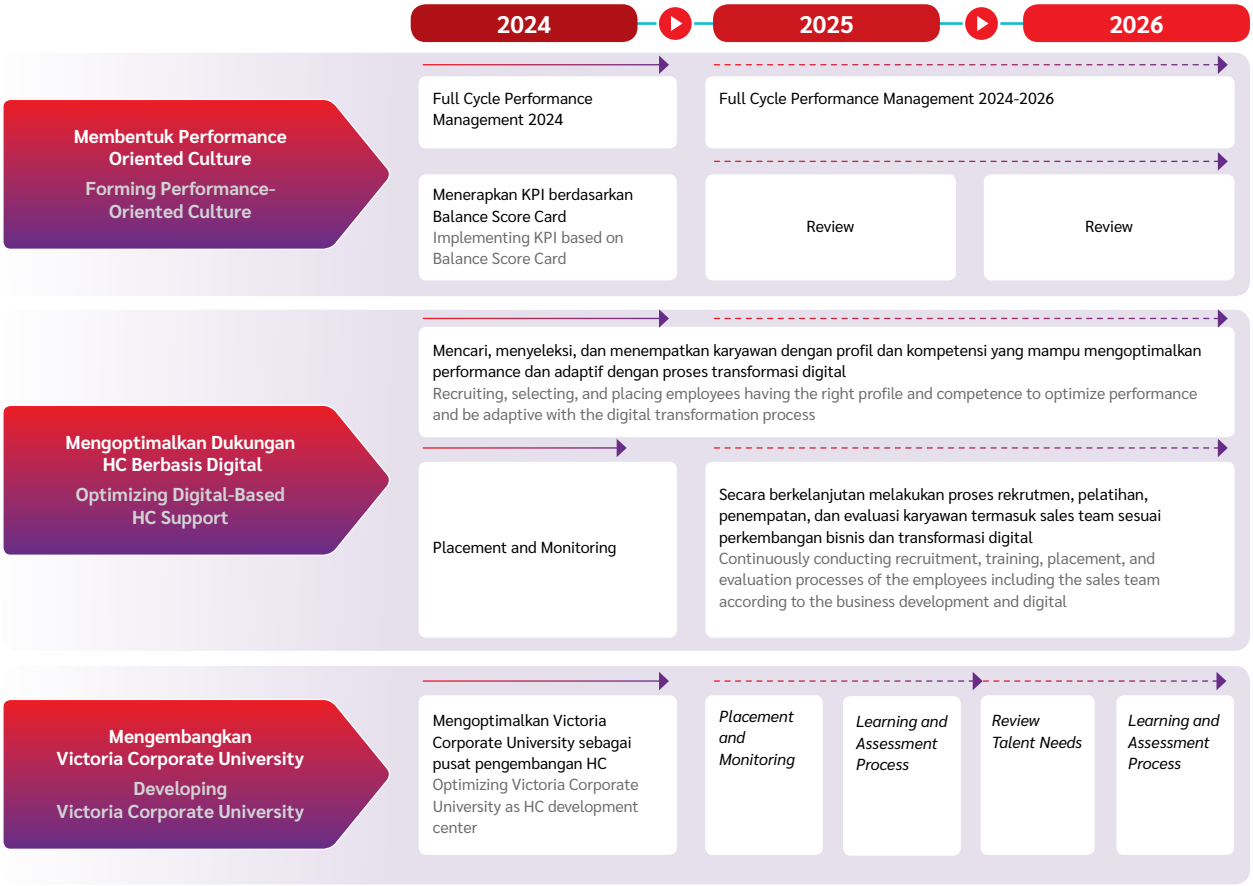
The Bank always upholds every employee's human rights by setting working hours and providing proper permissions, as follows:

1. The Bank implements proportional work hours, follows standards, and determines overtime hours and overtime facilities adjusted to the operational requirements;
2. Each employee of Bank Victoria is allowed to practice worship according to the respective belief;
3. The Bank gives its employees permission to leave work while still receiving full salary for:
   a. Special events, i.e. employee's marriage, marriage of employee's child, death of employee's husband/wife/child/child-in-law/parent/parent-in- law/other family member living in employee's household, child birth, employee's wife experiencing miscarriage, circumcision of child, baptism of child;
   b. Sick, i.e. illness with doctor's note, illness without doctor's reference letter for 1 (one) day, and illness requiring hospitalization;
   c. Urgent personal matter, sudden necessity that cannot be represented by others; and
   d. Experiencing obstacles beyond employee's control.
4. Employees who have worked in the Bank for 1 (one) consecutive year can take annual leave with full salary payment. The length of annual leave is determined based on employee's position, according to regulations applied at the Bank.

Compliance with Zero Child Labor and Forced Labor Employment Practice [POJK F.19]

Bank Victoria always complies with the applicable regulation, particularly in responsible HC management. This commitment is realized through anti-forced labor and guaranteeing of no underage workers (<18 years) in all of Bank's operational areas. In addition, the Bank also provides facilities for employees to assemble or associate.

Roadmap Pengelolaan *Human Capital*
Human Capital Management Roadmap



Perencanaan Kebutuhan *Human Capital*
Setiap tahun, Bank Victoria merencanakan kebutuhan HC berdasarkan identifikasi persyaratan, standar formasi, serta pertimbangan kinerja dan potensi. Strategi perencanaan HC untuk tahun 2023 melibatkan optimalisasi dan sinergi seluruh HC. Rekrutmen dilakukan untuk mengisi kekosongan jabatan akibat mengundurkan diri, promosi, atau rotasi karyawan.

Rekrutmen *Human Capital* [POJK F.18]
Dalam melaksanakan rekrutmen HC, Bank memberikan jaminan atas kesetaraan kesempatan kerja sesuai dengan prinsip pemenuhan hak asasi manusia, tanpa praktik diskriminatif suku, gender, agama, dan status sosial. Bank juga memprioritaskan tenaga kerja dalam negeri sebagai calon karyawan.

Berdasarkan Kebijakan *Human Capital Management* dan Standar Operasional Prosedur *Human Capital Management*, kelompok tenaga kerja yang direkrut meliputi karyawan organik, kontrak, dan *outsourcing.* Tahapan dalam proses seleksi penerimaan HC Bank sebagai berikut:
1. Seleksi administrasi;
2. Tes kemampuan dan kepribadian;
3. Wawancara oleh *Human Capital Management* dan *end user;*
4. Tes fisiologis dan tes simulasi pekerjaan; dan
5. Penilaian oleh pihak independen.

Planning for Human Capital Needs
Every year, Bank Victoria plans HC needs based on identification of requirements, formation standards, and performance and potential considerations. The strategies for HC planning in 2023 involved optimization and synergy of the entire HC. Recruitment is conducted to fill the vacant positions due to employee resignation, promotion, or rotation.

Human Capital Recruitment [POJK F.18]
In recruiting HC, the Bank guarantees an equal employment opportunity in accordance with the principles of fulfilling human rights, no discriminatory practices on ethnicity, gender, religion, and social status. The Bank also prioritizes domestic workers as prospective employees.

Based on the Human Capital Management Policy and Standard Operating Procedures for Human Capital Management, the group of manpower that is recruited consists of organic, contract, and outsourcing employees. The Bank's HC selection process consists of the following phases:
1. Administration selection;
2. Capability and personality test;
3. Interview by Human Capital Management and end user;
4. Physiological test and job simulation test; and
5. Assessment by independent party.

Pengembangan Kompetensi *Human Capital*
[POJK F.22]

Bank mengembangkan *Victoria Corporate University* (VCU) sebagai sarana pembelajaran dan pengembangan kompetensi HC. VCU sendiri memiliki misi sebagai berikut:

1. Mengembangkan program pendidikan dan pelatihan berbasis kompetensi;
2. Mengembangkan organisasi dan karyawan pembelajar yang efisien; dan
3. Membentuk *assessment center* serta *talent pool* yang mampu mengidentifikasi dan mengelola pengembangan karier karyawan guna menciptakan *leader* yang kuat.

Selain VCU, pengembangan kompetensi HC dilakukan melalui program pendidikan dan pelatihan yang ditekankan pada kebutuhan pengembangan individu yang bertujuan mendukung keberhasilan kinerja dan karier. Program pendidikan dan pelatihan disusun berdasarkan *training need analysis* dalam rencana pelatihan tahunan.

Informasi terkait pelaksanaan pengembangan kompetensi selama 3 (tiga) tahun terakhir ditunjukkan sebagai berikut:

Human Capital Competency Development
[POJK F.22]

The Bank develops Victoria Corporate University (VCU) as a means of learning and developing HC competencies. VCU itself has the following missions:

1. Developing competency-based education and training programs;
2. Developing efficient learning organization and employee; and
3. Establishing assessment center and talent pool having the ability to identify and manage employee's career development in order to generate strong leaders.

Apart from VCU, HC competency development is carried out through education and training programs which emphasize individual development needs to support performance and career success. Education and training programs are prepared based on training need analysis in the annual training plan.

Information related to the implementation of competency development for the last 3 (three) years is shown as follows:

Jenis Pelatihan Type of Training	Jumlah Pelatihan Total Trainings					Total Pelatihan Total Trainings	Komposisi Composition (%)
	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	Manajer Manager	Officer	Non-Staff		
2023							
Training/Inhouse	15	36	1,448	2,519	262	4,280	76.01
Refreshment Training	5	8	187	353	-	553	9.82
Training/Public	-	-	77	102	-	179	3.18
Seminar/Public	4	23	90	90	4	211	3.75
Certification	-	1	25	230	-	256	4.55
Certification Training	-	-	2	148	-	150	2.66
Educational Scholarship	-	-	1	1	-	2	0.04
Total	24	68	1,830	3,443	266	5,631	100.00
Komposisi (%) Composition (%)	0.43	1.21	32.50	61.14	4.72	100.00	
Biaya Pengembangan Kompetensi (Rp) Competency Development Cost (Rp)							4,844,814,746
Rata-Rata Jam Pelatihan (Jam) Average Training Hours (Hours)							5
2022							
Training/Inhouse	12	30	1,917	3,414	98	5,471	65.43
Refreshment Training	-	3	60	34	35	132	1.58
Training/Public	3	7	383	997	5	1,395	16.68
Seminar/Public	-	8	104	113	8	233	2.79
Certification	1	7	249	429	-	686	8.20
Certification Training	-	1	211	229	-	441	5.27

Jenis Pelatihan Type of Training	Jumlah Pelatihan Total Trainings					Total Pelatihan Total Trainings	Komposisi Composition (%)
	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	Manajer Manager	Officer	Non-Staff		
Educational Scholarship	-	-	2	1	-	3	0.04
Total	**16**	**56**	**2,926**	**5,217**	**146**	**8,361**	**100.00**
Komposisi (%) Composition (%)	**0.19**	**0.67**	**35.00**	**62.40**	**1.75**	**100.00**	
Biaya Pengembangan Kompetensi (Rp) Competency Development Cost (Rp)							**2,991,913,259**
2021							
Training/Inhouse	14	29	1,531	2,842	399	4,815	88.45
Refreshment Training	3	4	18	11	-	36	0.66
Training/Public	-	4	105	98	-	207	3.80
Seminar/Public	1	7	150	115	-	273	5.01
Certification	4	4	57	19	-	84	1.54
Certification Training	1	-	18	7	-	26	0.48
Educational Scholarship	-	-	2	1	-	3	0.06
Total	**23**	**48**	**1,881**	**3,093**	**399**	**5,444**	**100.00**
Komposisi (%) Composition (%)	**0.42**	**0.88**	**34.55**	**56.81**	**7.33**	**100.00**	
Biaya Pengembangan Kompetensi (Rp) Competency Development Cost (Rp)							**1,394,487,605**

Untuk mendukung proses pendistribusian ilmu pengetahuan secara menyeluruh dan terstruktur, Bank Victoria melaksanakan *Knowledge Management* yang dikelola melalui VCU. Hal ini ditujukan untuk menghimpun seluruh pengetahuan, keterampilan dan pengalaman kerja HC menjadi sumber informasi yang dapat diakses oleh seluruh HC. Pelaksanaan *Knowledge Management* melalui VCU selain dari pertemuan tatap muka melalui *training class room, sharing session*, serta sosialisasi, juga dilakukan melalui beberapa sarana, seperti, *e-learning,* intranet V-Smart, dan Vic-News.

Selain itu, VCU juga mengevaluasi efektivitas pelaksanaan sistem pelatihan dan pengembangan bagi HC dengan menggunakan *Form* Evaluasi Pasca *Training*. Hasil evaluasi akan menjadi pertimbangan penting untuk mengarahkan dan meningkatkan kebutuhan pelatihan lanjutan bagi HC.

Penilaian Kinerja *Human Capital*

Bank Victoria mengatur pelaksanaan penilaian kinerja HC dalam Kebijakan *Human Capital Management* yang disahkan melalui Surat Keputusan Direksi No. 001A/SK-DIR/12/22 tanggal 1 Desember 2022 dan Standar Operasional Prosedur *Human Capital Management* melalui Surat Keputusan Direksi No. 001B/SK-DIR/12/22 tanggal 1 Desember 2022. Penilaian kinerja HC didasarkan pada pencapaian kinerja, pemenuhan atau peningkatan kompetensi, dan penerapan nilai-nilai Bank Victoria. Implementasinya mengikuti *Key Performance Indicators* (KPI) dengan merujuk pada sistem *Balanced Scorecard* yang mencakup

To support the process of comprehensive and structured knowledge distribution, Bank Victoria carries out Knowledge Management, administered by VCU. This is intended to compile all HC knowledge, skills, and work experience to become a source of information accessible by all HC. The implementation of Knowledge Management through VCU, apart from face-to-face meetings through classroom training, sharing sessions, and dissemination, is also carried out through several channels, such as e-learning, V-Smart intranet, and Vic-News.

In addition, VCU also evaluates the effectiveness of HC training and development system by using the Post-Training Evaluation Form. The evaluation result will become an important consideration for directing and enhancing future HC training requirement.

Human Capital Performance Assessment

Bank Victoria regulates the HC's performance assessment in the Human Capital Management Policy, which was approved under the Board of Directors' Decision Letter No. 001A/SK-DIR/12/22 dated 1 December 2022 and Standard Operating Procedures for Human Capital Management under the Board of Directors' Decision Letter No. 001B/SK-DIR/12/22 dated 1 December 2022. HC performance assessment is conducted based on performance achievements, fulfillment or improvement of competencies, and implementation of Bank Victoria's values. Its implementation follows the Key Performance Indicators (KPI) by referring to the

perspektif keuangan, nasabah, pembelajaran dan pertumbuhan karyawan, serta proses bisnis internal.

Penilaian dilakukan 2 (dua) kali setahun untuk mengevaluasi kinerja, mengidentifikasi kelebihan dan kekurangan HC, serta menilai efektivitas sistem-sistem di Bank Victoria. Selanjutnya, hasil penilaian digunakan sebagai dasar untuk kenaikan remunerasi, bonus tahunan, serta penghargaan finansial dan non-finansial sesuai dengan kemampuan Bank setiap tahunnya.

Pengembangan Karier *Human Capital*

Bank memastikan tidak ada tindakan diskriminasi terhadap setiap karyawan pada program pengembangan karier dengan menerapkan prinsip *fair opportunity* dan *Prudential Career Management Guideline*. Dalam 3 (tiga) tahun terakhir, Bank telah melaksanakan pengembangan karier terhadap HC yang ditunjukkan sebagai berikut:

Balanced Scorecard system which includes the perspectives of finance, customers, employees' learning and growth, and internal business process.

Assessment is carried out twice in a year to evaluate HC performance, identify its advantage and disadvantage, and assess the effectiveness of Bank Victoria's systems. Thereafter, the assessment results are used as a basis for increasing remuneration, annual bonus, and financial and non-financial rewards adjusted to the Bank's ability every year.

Human Capital Career Development

The Bank ensures that there are no acts of discrimination against any employee in the career development program by applying fair opportunity principle and Prudential Career Management Guideline. In the past 3 (three) years, the Bank conducted career development on HC as shown below:

Pengembangan Karier Career Development	Jumlah Karyawan Total Employees								
	2023			2022			2021		
	Pria Male	Wanita Female	Total	Pria Male	Wanita Female	Total	Pria Male	Wanita Female	Total
Promosi ke Jabatan yang Lebih Tinggi Promotion to a Higher Position	8	9	17	13	8	21	8	13	21
Mutasi pada Jenjang yang Selevel Transfer at the Same Level	14	34	48	19	21	40	62	95	157

Human Capital Engagement

Bank Victoria menggunakan *Human Capital Engagement* sebagai parameter untuk mengukur tingkat keterikatan emosional karyawan terhadap Bank. Upaya untuk meningkatkan *engagement* karyawan dilakukan dengan memberikan kesempatan pendidikan, pelatihan, serta pengembangan karier melalui promosi, *job rotation*, *job enlargement,* dan kegiatan lainnya. Penilaian kinerja berdasarkan sistem *Balanced Scorecard* juga diterapkan mulai dari level perusahaan hingga individu, dengan pemantauan melalui *coaching, counseling*, dan *controlling*. *Human Capital Engagement* juga diperkuat melalui penerapan standar remunerasi yang adil, mempertimbangkan pemeringkatan karyawan, dan jenjang jabatan.

Human Capital Engagement

Bank Victoria uses Human Capital Engagement as a parameter to measure employees' emotional engagement to the Bank. Efforts to increase employees' engagement are carried out by providing opportunities for education, training, and career development through promotion, job rotation, job enlargement, and other activities. Performance assessment based on the Balanced Scorecard system is also applied from the Company to individual level, with monitoring through coaching, counseling, and controlling. Human Capital Engagement is also strengthened through the implementation of fair remuneration standard and consideration of employee's ranking and position level.

Industrial Relations

Bank Victoria menciptakan suasana kerja terbuka, positif, dan progresif untuk membina hubungan industrial yang harmonis dan dinamis. Hal ini diwujudkan melalui Peraturan Perusahaan Bank Victoria yang dimutakhirkan dan disahkan oleh Kementerian Tenaga Kerja dan Transmigrasi melalui Surat Keputusan Direktur Jenderal Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep.4/HI.00.00/00.0000.230404006/B/VII/2023 tanggal 18 Juli 2023 tentang Pengesahan Peraturan Perusahaan PT Bank Victoria International Tbk. Peraturan ini diperbarui secara berkala mengikuti perubahan regulasi dan perkembangan industri perbankan di Indonesia.

Industrial Relations

Bank Victoria creates an open, positive, and progressive work atmosphere to foster harmonious and dynamic industrial relations. This is realized through Bank Victoria's Company Regulations, which were updated and validated by the Ministry of Manpower and Transmigration through the Directorate General of Industrial Relations Development and Labor Social Security Decree No. Kep.4/HI.00.00/00.0000.230404006/B/VII/2023 dated 18 July 2023 on Approval of Company Regulations of PT Bank Victoria International Tbk.This Company Regulations are updated periodically in line with the amendments to the regulations and development of the banking industry in Indonesia.

Internalisasi Budaya Perusahaan *Human Capital*

Budaya Perusahaan di Bank Victoria bertujuan menciptakan transformasi budaya kerja yang lebih profesional, dimulai dari *awarenes, engagement, acceptance*, hingga *ownership*. Oleh karenanya, Bank menetapkan program kerja untuk memperkuat budaya kerja berorientasi *intrapreneurship*, kinerja, inovasi, dan efisiensi. Hal itu dilakukan untuk mewujudkan transformasi budaya kerja, seperti sosialisasi dan komunikasi nilai budaya perusahaan, internalisasi nilai budaya perusahaan, penyelarasan sistem organisasi dan HC, serta pelaksanaan program *recognition*. Program tersebut dilaksanakan secara konsisten sebagai bagian yang tidak terpisahkan dari kegiatan operasional Bank.

Internalization of Human Capital Corporate Culture

Corporate Culture at Bank Victoria aims to create a more professional work culture transformation, starting from awareness, engagement, acceptance, to ownership. Therefore, the Bank established a work program to strengthen the work culture oriented on intrapreneurship, performance, innovation, and efficiency. That matter is conducted to manifest the work culture transformation, such as dissemination and communication of corporate culture values, internalization of corporate cultural values, alignment of organizational and HC systems, and implementation of recognition programs. The program is implemented consistently as an inseparable part of the Bank's operational activities.

Jumlah *Human Capital* [POJK C.3]
Total Human Capital

Uraian Description	2023				2022				2021			
	Pria Male	Wanita Female	Total	%	Pria Male	Wanita Female	Total	%	Pria Male	Wanita Female	Total	%
LEVEL ORGANISASI / ORGANIZATIONAL LEVEL												
Direksi Boards of Directors	4	1	5	0.70	4	1	5	0.73	4	1	5	0.72
Manajemen Management	87	84	171	23.98	78	83	161	23.40	81	85	166	23.92
Staf Staff	283	254	537	75.32	282	240	522	75.87	283	240	523	75.36
Total	374	339	713	100.00	**364**	**324**	**688**	**100.00**	**368**	**326**	**694**	**100.00**
TINGKAT PENDIDIKAN / EDUCATIONAL LEVEL												
Doktor Doctorate	2	-	2	0.28	-	-	-	-	-	-	-	-
Pascasarjana Post-Graduates	24	12	36	5.05	23	13	36	5.23	23	8	31	4.47
Sarjana Graduates	185	223	408	57.22	176	202	378	54.94	166	205	371	53.46
Diploma	28	72	100	14.03	29	78	107	15.55	36	80	116	16.71
<SMA < High School	135	32	167	23.42	136	31	167	24.27	143	33	176	25.36
Total	374	339	713	100.00	**364**	**324**	**688**	**100.00**	**368**	**326**	**694**	**100.00**
STATUS KARYAWAN / EMPLOYMENT STATUS												
Karyawan Tetap Permanent Employee	199	211	410	57.50	193	206	399	57.99	205	211	416	59.94
Karyawan Tidak Tetap Non-permanent Employee	42	127	169	23.70	36	117	153	22.24	21	112	133	19.16
Outsorcing	133	1	134	18.80	135	1	136	19.77	142	3	145	20.89
Total	374	339	713	100.00	**364**	**324**	**688**	**100.00**	**368**	**326**	**694**	**100.00**
USIA / AGE												
>60 Tahun >60 Years Old	7	6	13	1.82	10	5	15	2.18	9	4	13	1.87

Uraian Description	2023				2022				2021			
	Pria Male	Wanita Female	Total	%	Pria Male	Wanita Female	Total	%	Pria Male	Wanita Female	Total	%
51–60 Tahun 51–60 Years Old	43	34	77	10.80	38	32	70	10.17	43	27	70	10.09
41–50 Tahun 41–50 Years Old	108	47	155	21.74	105	43	148	21.51	100	45	145	20.89
31–40 Tahun 31–40 Years Old	129	117	246	34.50	136	127	263	38.23	140	128	268	38.62
21–30 Tahun 21–30 Years Old	86	132	218	30.58	74	112	186	27.03	76	121	197	28.39
18-20 Tahun 18-20 Years Old	1	3	4	0.56	1	5	6	0.87	-	1	1	0.14
Total	374	339	713	100.00	**364**	**324**	**688**	**100.00**	**368**	**326**	**694**	**100.00**
MASA KERJA / YEARS OF SERVICES												
>20 Tahun >20 Years	11	11	22	3.09	9	13	22	3.20	7	11	18	2.59
16-20 Tahun 16-20 Years	23	14	37	5.19	32	15	47	6.83	23	12	35	5.04
11-15 Tahun 11-15 Years	54	47	101	14.17	40	57	97	14.10	41	57	98	14.12
6-10 Tahun 6-10 Years	86	67	153	21.46	99	93	192	27.91	95	71	166	23.92
0-5 Tahun 0-5 Years	200	200	400	56.10	184	146	330	47.97	202	175	377	54.32
Total	374	339	713	100.00	**364**	**324**	**688**	**100.00**	**368**	**326**	**694**	**100.00**

Remunerasi Karyawan [POJK F.20]

Bank memberikan apresiasi terhadap kontribusi karyawan dalam kemajuan Bank Victoria melalui pemberian remunerasi yang adil sesuai dengan tanggung jawab kerja masing-masing. Bank juga selalu memperhatikan ketentuan Upah Minimum Regional (UMR) dan tingkat upah di industri sejenis. Untuk karyawan di jabatan terendah, upah tetap disesuaikan dengan UMR di wilayah operasional masing-masing, dengan rincian sebagai berikut:

Employee Remuneration [POJK F.20]

The Bank appreciates the employees' contributions in developing Bank Victoria by providing fair remuneration according to their respective work responsibility. Also, the Bank always pays high regard to the provisions of Regional Minimum Wage (UMR) and wage level in similar industry. For employees in the lowest position, their wage remains adjusted to the minimum wage in their respective operational area, with the following details:

Wilayah Region	Upah Karyawan Tetap Terendah Lowest Permanent Employee's Wage (Rp)	Upah Minimum Regional Regional Minimum Wage (Rp)	Rasio Upah Karyawan Tetap Terendah dibandingkan UMR Ratio of the Lowest Permanent Employee's Wage to UMR (%)
Bandung	4,209,500	4,209,309	100.00
Bogor	4,814,000	4,813,988	100.00
Denpasar	3,097,000	3,096,823	100.01
DKI Jakarta	5,067,500	5,067,381	100.00
Manado	3,591,000	3,590,858	100.00
Makassar	3,643,500	3,643,321	100.00
Medan	3,769,500	3,769,082	100.01
Semarang	3,244,000	3,243,969	100.00
Surabaya	4,725,500	4,725,479	100.00
Surakarta	2,269,500	2,269,070	100.02

Hak Cuti Melahirkan

Informasi terkait cuti melahirkan yang diberikan Bank kepada karyawan wanita dan pria pada tahun 2023 diungkapkan sebagai berikut:

Maternity Leave Rights

Information regarding maternity leave provided by the Bank to female and male employees in 2023 is disclosed as follows:

Uraian Description	Pria Male	Wanita Female	Jumlah Total
Karyawan yang berhak mendapat cuti Employees eligible to take leave	159	165	324
Karyawan yang mengambil hak cuti Employees taking leave	22	26	48
Karyawan yang kembali bekerja pada periode pelaporan setelah cuti berakhir Employees returning to work in the reporting period after leave ends	22	26	48
Karyawan yang kembali bekerja setelah cuti berakhir, yang masih dipekerjakan 12 bulan setelah kembali bekerja Employees returning to work after leave ends, still employed 12 months after returning to work	22	26	48

Program Pensiun

Bank Victoria memperhatikan kesejahteraan karyawan yang telah berkontribusi pada kemajuan usaha hingga memasuki usia pensiun. Program pensiun dilaksanakan sesuai dengan Kebijakan *Human Capital Management* dan Standar Operasional Prosedur *Human Capital Management*. Karyawan yang mencapai usia di atas 55 tahun dapat mengikuti program pensiun dan menerima uang pensiun sesuai ketentuan. Selain itu, pensiunan juga memiliki opsi untuk dipekerjakan kembali sebagai karyawan kontrak.

Pension Program

Bank Victoria pays attention to employees' welfare who have contributed to the business progress until they enter retirement age. Pension program is carried out in accordance with the Human Capital Management Policy and Standard Operating Procedures for Human Capital Management. Employees entering the age of over 55 years can join the pension program and receive a pension in accordance with the provisions. Furthermore, the retiree also has the option to be rehired under contract status.

Tingkat Perputaran Karyawan

Meskipun perputaran karyawan adalah fenomena umum di industri perbankan, Bank Victoria secara konsisten melakukan berbagai upaya untuk menjaga *engagement* karyawan dan meminimalkan tingkat perputaran. Penyebab perputaran karyawan dapat bervariasi, mulai dari pensiun, pengunduran diri, pemutusan hubungan kerja, dan faktor lainnya.

Tingkat perputaran karyawan di Bank selama 3 (tiga) tahun terakhir sebagai berikut:

HC Turnover Rate

Although employee turnover is a common phenomenon in banking industry, Bank Victoria consistently implement various efforts to maintain employee engagement and reduce turnover rates. Reasons for employee turnover are various, such as pension, resigning, terminated, and other factors.

The employee turnover rate at the Bank for the past 3 (three) years is as follows:

Uraian	2023	2022	2021	Description
Total Karyawan yang Keluar	**157**	**165**	**260**	**Total Employees Leaving**
Pria	**88**	68	101	Male
Wanita	**69**	97	159	Female
Total Karyawan	**713**	**688**	**694**	**Total Employees**
Tingkat Perputaran Karyawan dalam Setahun (%)	**22.02**	**23.84**	**34.83**	**Employee Turnover Rate in a Year (%)**

Strategi Pengelolaan *Human Capital* Tahun 2024

Bank menyusun rencana kerja pengelolaan HC setiap tahun untuk memastikan kelangsungan rencana kerja. Untuk tahun 2024, rencana kerja pengelolaan HC Bank sebagai berikut:

1. Penyempurnaan dan pengembangan penyusunan KPI *balance score card* melalui *Human Resource Information System* (HRIS);

Human Capital Management Strategy in 2024

The Bank prepares HC management work plan annually to ensure the continuity of the work plan. For 2024, the Bank's HC management work plan is as follows:

1. Refining and developing KPI balance score card preparation through Human Resource Information System (HRIS);

2. Penginian Peraturan Perusahaan *Online* melalui Pppkb. Kemnaker.Go.Id;
3. Pemenuhan kewajiban sertifikasi kompetensi sesuai ketentuan, meliputi:
   a. Sertifikasi Manajemen Risiko;
   b. Sertifikasi Sistem Pembayaran dan Pengelolaan Uang Rupiah (SPPUR);
   c. Sertifikasi Tresuri Dealer;
   d. Sertifikasi Audit; dan
   e. Sertifikasi Kepatuhan;
4. Penyelenggaraan program pelatihan penyegaran terkait sertifikasi kompetensi;
5. Penyelenggaraan program pelatihan, baik secara *inhouse training* yang diselenggarakan internal bekerja sama dengan vendor *training* dan juga *training* publik terkait sesuai dengan rencana kerja pelatihan serta kebutuhan divisi kerja;
6. Pelaksanaan program pelatihan induksi bagi karyawan yang baru (*onboarding)*;
7. Pelaksanaan program pelatihan sosialisasi terkait penginian kebijakan, sistem prosedur, dan juga produk Bank;
8. Penyusunan modul dan kurikulum kredit SME dalam rangka pengembangan Victoria Corporate University;
9. Pelaksanaan pemenuhan kebutuhan karyawan serta senantiasa melakukan program rotasi dan mutasi untuk penyegaran dan pengembangan karier karyawan; dan

10. Penyampaian pelaporan ketenagakerjaan kepada pihak terkait lainnya seperti Otoritas Jasa Keuangan, Bank Indonesia, Kementerian Ketenagakerjaan, Dinas Tenaga Kerja dan Transmigrasi Wilayah, Kantor Pajak, dan sebagainya.

Pengelolaan Kesehatan dan Keselamatan Kerja
[POJK F.21]

Bank berkomitmen untuk menyediakan lingkungan kerja yang aman dan nyaman sebagai pemenuhan hak karyawan sekaligus menjaga produktivitas usaha. Komitmen tersebut diwujudkan dengan memperhatikan tata ruang kerja yang dilengkapi dengan penerangan yang cukup, sirkulasi udara lancar, temperatur udara yang dapat disesuaikan melalui pendingin udara (AC), serta sarana dan prasarana penunjang keselamatan kerja yang memadai.

Bank melakukan beberapa upaya untuk memastikan keselamatan dan keamanan karyawan secara berkala, salah satunya dengan melakukan pemeliharaan *lift* sebagai fasilitas dengan intensitas penggunaan yang cukup tinggi. Selain itu, Bank juga menggunakan monitor komputer anti radiasi untuk menjaga kesehatan mata karyawan. Selanjutnya, Bank telah memiliki skema penanganan rencana situasi darurat atau evakuasi kebakaran yang ditempatkan di seluruh ruang kerja karyawan pada setiap lantai gedung agar mudah diketahui karyawan.

2. Updating Company Regulations Online through Pppkb. Kemnaker.Go.Id;
3. Fulfilling competency certification obligations in accordance with provisions, including:
   a. Risk Management Certification;
   b. Payment System Certification and Rupiah Money Management (SPPUR);
   c. Dealer Treasury Certification;
   d. Audit Certification; and
   e. Compliance Certification;
4. Organizing refreshment training programs related to competency certification;
5. Organizing training programs, both in-house training, organized internally in cooperation with training vendors, and public-related training in accordance with training work plans and work division needs;
6. Implementing induction training programs for new (onboarding) employees;
7. Implementing dissemination training programs related to update of the Bank's policies, system procedures, and products;
8. Preparing SME credit modules and curriculum for the development of Victoria Corporate University;
9. Implementing employee needs and continuously carrying out rotation and transfer programs to refresh and develop employee careers; and
10. Submitting employment reports to other related parties such as Financial Services Authority, Bank Indonesia, Ministry of Manpower, Regional Manpower and Transmigration Service, Tax Office, and so on.

Occupational Health and Safety Management
[POJK F.21]

The Bank is committed to providing a safe and comfortable work environment to fulfill employee rights while maintaining business productivity. Such commitment is realized by paying attention to the work space arrangement which must be supported by adequate lighting, sufficient air circulation, air temperature which can be adjusted through the air conditioner (AC), and adequate occupational safety supporting equipment.

Bank regularly makes several efforts to ensure employees safety and security, one of which is by conducting lift maintenance as a facility with the high intensity of use. In addition, the Bank also uses anti radiation monitor to maintain employee's healthy vision. Furthermore, the Bank has emergency plan and fire evacuation handling scheme placed in all employee's work space on each floor in the building so that employees can easily identify them.

Bentuk kepedulian lain yang diperhatikan Bank terhadap kesehatan dan keselamatan kerja karyawan diwujudkan dengan mengikutsertakan pada program Jaminan Sosial Tenaga Kerja (Jamsostek) yang meliputi:
1. Program Jaminan Hari Tua (JHT);
2. Program Jaminan Kecelakaan Kerja (JKK);
3. Program Jaminan Kematian (JKM); serta
4. Program Jaminan Pensiun (JP).

Selain program jaminan kesehatan, Bank juga mengikutsertakan asuransi kesehatan untuk keluarga karyawan, mencakup suami/istri dan anak. Asuransi kesehatan tersebut mencakup pemeriksaan dan perawatan di rumah sakit, baik untuk rawat inap, rawat jalan, perawatan gigi, serta program melahirkan bagi istri karyawan.

Penanganan Keadaan Darurat Keselamatan Kerja

Penanganan keadaan darurat di Bank Victoria dimulai dengan mengidentifikasi potensi kecelakaan kerja di wilayah operasional, yaitu:
1. Kebakaran dan/atau ledakan;
2. Faktor alam, seperti banjir, gempa bumi, tsunami, gunung meletus, dan lain-lain; serta
3. Sabotase/aktivitas terorisme, ancaman bom, dan huru-hara.

Berdasarkan hal tersebut, Bank telah menetapkan prosedur untuk menangani keadaan darurat yang terjadi di wilayah operasional Bank.

Tingkat Kecelakaan Kerja

Selama 3 (tiga) tahun terakhir, tidak terdapat kasus kecelakaan kerja yang terjadi di Bank. Hal tersebut merupakan dampak dari komitmen Bank dalam menyediakan lingkungan kerja yang layak dan aman.

Sarana Pengaduan terkait Pengelolaan HC

Pengaduan masalah atau konflik ketenagakerjaan dapat diajukan kepada Divisi *Human Capital Management & General Affair*. Selama 3 (tiga) tahun terakhir Bank tidak menerima adanya pengaduan terkait pengelolaan HC.

Berkembang Bersama Masyarakat

Bank Victoria berkontribusi pada pembangunan ekonomi dan sosial masyarakat melalui program tanggung jawab sosial perusahaan (*corporate social responsibility/*CSR). Pelaksanaan program CSR mengacu pada Surat Keputusan Direksi No. 002/SK-DIR/12/18 tanggal 19 Desember 2018 entang *Corporate Social Responsibility* (CSR).

Another form of concern that the Bank pays attention to employee's occupational health and safety is realized by registering the employees in the Workers' Social Security (Jamsostek) program which includes:
1. Old Age Savings Program (JHT);
2. Occupational Accident Program (JKK);
3. Death Benefit Program (JKM); and
4. Pension Program (JP).

In addition to health insurance program, the Bank also registers employee's family in health insurance which includes husband/ wife and children. The health insurance covers health examination and treatment in hospital, both for inpatient and outpatient, and dental care, as well as employee's maternity program.

Occupational Safety Emergency Handling

Emergency handling at Bank Victoria begins with identifying potential occupational accidents in operational areas, among others:
1. Fire and/or explosion;
2. Nature factors, such as flood, earthquake, tsunami, volcano, etc; and
3. Sabotage/ terrorism activities, bomb threats, and riots.

Based on such matters, the Bank has established procedures to handle emergency situation that occurs in the Bank's operational areas.

Occupational Accident Rate

In the last 3 (three) years, there were no occupational accident cases that occurred at the Bank. This is the impact of the Bank's commitment to providing a decent and safe work environment.

Complaint Channel Related to HC Management

Complaints regarding manpower problems or conflicts can be submitted to the Human Capital Management & General Affairs Division. Information on complaints received and followed up by Bank Victoria in the past 3 (three) years is shown as follows:

Developing Together with the Community

Bank Victoria contributes to the community's economic and social development through the corporate social responsibility (CSR) programs. CSR program implementation refers to the Board of Directors' Decision Letter No. 002/SK-DIR/12/18 dated 19 December 2018 on Corporate Social Responsibility (CSR).

Visi dan Misi CSR
CSR Vision and Mission

Visi / Mission

Menjadi mitra dalam meningkatkan kualitas pendidikan, kesehatan, dan kesejahteraan masyarakat untuk menjadi lebih baik serta ikut berperan dalam membangun hubungan antara perusahaan dengan masyarakat yang berkelanjutan.

To become a partner in improving the quality of education, health, and welfare of the community to be better and play a role in building sustainable relationships between the company and communities.

Misi / Mission

- Berpartisipasi dalam mengurangi keterbelakangan sosial kemasyarakatan sesuai dengan kapasitas dan kemampuan perusahaan.
- Berpartisipasi dalam meningkatkan kualitas pendidikan dasar bagi anak-anak sekolah.
- Berupaya untuk mengimplementasikan cara-cara konservasi energi dalam rutinitas pekerjaan sehari-hari.
- Berupaya untuk mendukung kegiatan serta aktivitas positif melalui kerja sama yang lebih dekat dengan berbagai komunitas di bidang perbankan.
- Ikut serta berperan dalam program pemberdayaan masyarakat secara berkelanjutan.

- To participate in reducing social backwardness in accordance with the Company's capacity and capabilities.
- To participate in improving the quality of basic education for school children.
- To make efforts to implement energy conservation methods in daily work routines.
- To make efforts to support positive activities through closer cooperation with various communities in the banking sector.
- To continuously participate in community empowerment program.



Penggunaan Tenaga Kerja Lokal [POJK F.25]

Bank Victoria memberikan kontribusi pada pertumbuhan perekonomian daerah dengan memprioritaskan tenaga kerja lokal (domisili KTP sesuai wilayah operasional) sebagai karyawan Bank. Komitmen ini tercermin dalam karyawan Bank yang seluruhnya adalah Warga Negara Indonesia (WNI), dan sebanyak 67,46% di antaranya merupakan tenaga kerja lokal.

Use of Local Manpower [POJK F.25]

Bank Victoria contributes to regional economic growth by prioritizing local manpower (domicile stated on ID card conforms to the operational area) as Bank employees. This commitment is reflected by having all of the Bank's employees of Indonesian nationality (WNI), and 67.46% among them are local manpower.

Perbaikan Sarana dan Prasarana Sosial [POJK F.25]

Di setiap tahunnya, Bank turut serta dalam kegiatan perbaikan sarana dan prasarana sosial dalam hal ini di bidang pendidikan. Perbaikan sarana dan prasarana sosial yang Bank lakukan di tahun 2023 diuraikan sebagai berikut:

Social Facility and Infrastructure Repair [POJK F.25]

Every year, the Bank takes part in activities to repair social facilities and infrastructure. Social facility and infrastructure repairs that the Bank provided in 2023 are described as follows:

Kegiatan Activity	Lokasi Location	Penerima Manfaat Beneficiaries (Orang / People)
Bantuan kelengkapan alat tulis sekolah Assistance of school stationery.	Sekolah Dasar Dewi Sartika, Cilincing, Jakarta Utara Dewi Sartika Elementary School, Cilincing, North Jakarta	200
Pengadaan alat pendingin ruangan [AC]. Procurement of air conditioning [AC] equipment.	Sekolah Dasar Laksa Bhakti, Jembatan Lima, Jakarta Barat Laksa Bhakti Elementary School, Jembatan Lima, West Jakarta	75

Biaya Kegiatan Perbaikan Sarana dan Prasarana Sosial

Berikut informasi kegiatan perbaikan sarana dan prasarana sosial yang telah dikeluarkan Bank selama 3 (tiga) tahun terakhir:

Costs for Social Facility and Infrastructure Repairs

The following is information on activities to repair social facilities and infrastructure carried out by the Bank in the past 3 (three) years:

(dalam Rupiah / in Rupiah)

2023	2022	2021
5,500,000	88,967,970	39,789,600

Pemberian Donasi [POJK F.25]

Bank berupaya berkontribusi sebagai donatur dalam kegiatan-kegiatan yang bermanfaat bagi masyarakat. Pada tahun 2023, kegiatan yang dibantu pendanaannya oleh Bank ditunjukkan sebagai berikut:

Donation [POJK F.25]

The Bank strives to contribute as a donor in beneficial activities to the community. In 2023, the funding activities by the Bank were shown as follows:

Kegiatan Activity	Lokasi Location	Penerima Manfaat Beneficiaries (Orang / People)
Pemberian vitamin C untuk seluruh karyawan Bank Providing vitamin C to all Bank Victoria employees.	Kantor Pusat dan Cabang Bank Victoria Bank Victoria Head Office and Branches	691
Pemberian paket bingkisan Hari Raya Lebaran untuk karyawan Bank Victoria. Providing Eid al-Fitr gift packages to Bank Victoria employees.	Kantor Pusat dan Cabang Bank Victoria Bank Victoria Head Office and Branches	691
Pemberian vitamin untuk guru dan murid serta sarana penunjang kegiatan belajar mengajar berupa 1 (satu) unit AC. Medical assistance in form of vitamins for teachers and students and facility to support teaching and learning activities in form of 1 (one) AC unit.	SD Laksa Bhakti Jl. Laksa III No. 6, RT 11 RW 1, Jemb. Lima Kec. Tambora, Jakarta Barat, DKI Jakarta	200
Pemberian vitamin untuk guru dan murid serta sarana pendukung pendidikan berupa buku tulis. Medical assistance in the form of vitamins for teachers and students as well as facility to support education in the form of notebooks.	SD Dewi Sartika Gg. Manunggal 7 No. 19, RT 5 RW 15, Kali Baru Kec. Cilincing, Jakarta Utara, DKI Jakarta	75
Bantuan dana pendidikan dan dana operasional Yayasan STT Iman. Assistance of educational funds and operational funds for STT Iman Foundation.	Jl. Wijaya I No. 29 - 31 Jakarta Selatan	10
Santunan CSR dalam rangka Bulan Suci Ramadhan tahun 2023, berupa santunan ke Panti Asuhan Al – Qamariyah. CSR compensation in the Holy Month of Ramadhan 2023, in form of compensation to Al – Qamariyah Orphanage.	Pondok Pinang, Jakarta Selatan	30
Santunan CSR dalam rangka Bulan Suci Ramadhan tahun 2023, berupa santunan ke Panti Asuhan Chairul Amal. CSR compensation in the Holy Month of Ramadhan 2023, in form of compensation to Chairul Amal Orphanage.	Cikasungka, Solear, Tangerang	30
Santunan CSR dalam rangka Bulan Suci Ramadhan tahun 2023, berupa santunan ke anak almarhum karyawan. CSR compensation in the Holy Month of Ramadhan 2023, in form of compensation to children of deceased employees.	Jakarta	13
CSR bantuan sosial kemasyarakatan ke Panti Tuna Netra Elsafan. CSR social assistance to Elsafan Home for the Blind.	Pondok Bambu, Jakarta Timur	47
CSR bantuan sosial kemasyarakatan ke Yayasan Hati Suci. CSR social assistance to Hati Suci Foundation.	Jl. Hati Suci, Jakarta Pusat	10

Biaya Kegiatan Pemberian Donasi

Berikut informasi kegiatan pemberian donasi yang telah dikeluarkan Bank selama 3 (tiga) tahun terakhir:

Cost for Donation Activity

Information on donation activities carried out by the Bank in the past 3 (three) years is as follows:

(dalam Rupiah / in Rupiah)

2023	2022	2021
174,110,888	149,247,694	603,688,244

Dampak Operasi terhadap Masyarakat Sekitar [POJK F.23]

Secara umum, pengelolaan usaha Bank tidak menimbulkan dampak negatif kepada masyarakat. Namun, kehadiran produk Bank dan kegiatan CSR memberikan dampak positif serta manfaat bagi masyarakat umum. Dampak positif yang dapat dirasakan masyarakat di sekitar Bank adalah terbukanya lapangan kerja dengan mengikuti proses rekrutmen Bank Victoria. Selain itu, keberadaan Bank juga membuka peluang bagi pelaku usaha lokal untuk menjadi pemasok atau vendor barang dan jasa yang dibutuhkan Bank. Dengan adanya dampak positif tersebut, maka akan membuka peluang terjadinya peningkatan taraf hidup dan perekonomian masyarakat setempat. Selain membuka lapangan kerja dan membuka peluang para pengusaha lokal menjadi pemasok, manfaat atas keberadaan Bank juga dirasakan masyarakat melalui penerapan berbagai program kegiatan sebagai implementasi tanggung jawab sosial perusahaan.

Impact of Operations on Surrounding Community [POJK F.23]

In general, the management of the Bank's business does not have a negative impact on the community. However, the presence of the Bank's products and CSR activities have a positive impact and benefits for the general public. The positive impact that can be felt by the community around the Bank is the opening of employment opportunities by participating in Bank Victoria's recruitment process. In addition, the existence of the Bank also opens up opportunities for local business actors to become suppliers or vendors of goods and services needed by the Bank. With this positive impact, it will open up opportunities for an increase in the standard of living and the economy of the local community. In addition to opening employment opportunities and opening opportunities for local entrepreneurs to become suppliers, the benefits of the Bank's existence are also felt by the community through the implementation of various activity programs as the implementation of corporate social responsibility.

Sarana Pengaduan Masyarakat [POJK F.24]

Bank Victoria mengimbau masyarakat untuk melaporkan aktivitas Bank yang melanggar peraturan dan merugikan pihak-pihak tertentu melalui sarana pengaduan berikut:

1. *Call Center* yang beroperasi 24 jam melalui panggilan 1500977;
2. *E-mail* customercare@victoriabank.co.id; dan
3. *Customer service* yang berada di cabang-cabang terdekat yang secara berkala akan dilaporkan kepada kantor pusat terkait data pengaduan dan tingkat penyelesaiannya.

Hingga akhir tahun 2023, Bank Victoria tidak menerima adanya pengaduan dari masyarakat akibat kegiatan CSR yang dijalankan.

Community Complaint Channel [POJK F.24]

Bank Victoria urges the community to report Bank activities that violate the regulations and harm certain parties through the following complaint channels:

1. 24 Hour Call Center 1500977;
2. E-mail customercare@victoriabank.co.id; and
3. Customer services at the nearest branch offices that regularly submit the report to the head office regarding the complaint data and settlement status.

Until the end of 2023, Bank Victoria did not receive any complaints from the community on the CSR activities carried out.

Rantai Pasok yang Bertanggung Jawab

Bank mengakui pentingnya mitra usaha dalam memperlancar kegiatan operasional. Oleh karena itu, Bank memiliki proses seleksi mitra usaha yang ketat untuk memastikan bahwa Bank hanya bekerja dengan mitra usaha yang mematuhi undang-undang dan peraturan yang berlaku. Proses ini membantu Bank untuk mempertahankan standar kualitas yang tinggi di seluruh operasi Bank.

Dengan bekerja sama dengan mitra usaha yang memiliki nilai dan komitmen yang sama dengan Bank, Bank membangun jaringan mitra yang dapat membantu Bank mencapai tujuan keberlanjutan sambil memberikan layanan berkualitas tertinggi kepada nasabah.

Responsible Supply Chain

The Bank recognizes the importance of business partners to accelerate the operational activities. Therefore, the Bank has a strict business partner selection process to ensure that the Bank only works with business partners that comply with the applicable laws and regulations. This process helps the Bank to maintain high quality standards throughout the Bank's operations.

By cooperating with business partners who share the same values and commitments as the Bank, the Bank builds a network of partners to help the Bank achieve its sustainability goals while providing the highest quality services to customers.

Keberlanjutan Kinerja Lingkungan Hidup
Environmental Performance Sustainability

Kegiatan Usaha Berwawasan Lingkungan

Bank Victoria terus mendukung pencapaian SDGs di Indonesia melalui penyaluran kredit kepada kegiatan usaha yang berkelanjutan. Pertimbangan utama dalam memberikan kredit adalah memperhatikan dampak langsung dan tidak langsung terhadap keberlanjutan ekonomi, sosial, dan lingkungan dari penggunaan kredit. Oleh karena itu, Bank telah memetakan kelompok usaha yang didanai dan merancang kebijakan terkait penyaluran kredit tersebut.

Environmentally-Friendly Business Activities

Bank Victoria continues to support the SDGs achievement in Indonesia by lending to sustainable business activities. The main consideration in providing loans is by considering direct and indirect impact on economic, social, and environmental aspects of sustainability from the financing. Therefore, the Bank has mapped out the funded business groups and designed policies related to such lending.

Pembiayaan dengan Pertimbangan Aspek Lingkungan Hidup

Bank mewajibkan kepemilikan dokumen Analisis Mengenai Dampak Lingkungan Hidup (AMDAL) bagi (calon) debitur yang mengelola lahan dengan luas 25 hektare atau lebih sebagai syarat pengajuan kredit. Kebijakan ini mengacu pada Keputusan Direksi No. 025A/SK-DIR/09/23 tentang Standar Operasional Prosedur Perkreditan *Commercial* dan SME PT Bank Victoria International Tbk. Melalui AMDAL, Bank dapat menganalisis dampak lingkungan dari kegiatan usaha debitur, memastikan keberlanjutan, dan menentukan pemberian kredit kepada (calon) debitur yang memenuhi persyaratan. Informasi penyaluran kredit dengan pertimbangan aspek lingkungan hidup selama 3 (tiga) tahun terakhir ditunjukkan sebagai berikut:

Financing by Considering the Environmental Aspect

The Bank requires ownership of Environmental Impact Analysis (AMDAL) document for (potential) debtor who manages land of 25 hectares or more as a requirement in applying loan. This policy refers to the Board of Directors' Decision Letter No. 025A/SK-DIR/09/23 on Guidelines for Commercial and Consumer Loans of PT Bank Victoria International Tbk. Through AMDAL, the Bank can analyze the environmental impact of the debtor's business activities, ensure the sustainability, and determine loan provision to (potential) debtor fulfilling the requirements. Information regarding lending with due observance of the environmental aspect for the past 3 (three) years is shown below:

(dalam juta Rupiah / in million Rupiah)

Debitur Debtor	2023	2022	2021
PT Perkebunan Nusantara III	-	210,787	235,000
PT Ungaran Sari Garment	59,269	82,435	98,647
PT Lamipak Primula Ind	-	19,367	19,625
PT IGP International	81,667	89,257	69,140
PT Nada Surya Tunggal	-	24,702	24,749
PT Paberik Tekstil Kasrie	-	8,000	16,000
PT Pratama Unggul S	23,233	9,920	8,867
PT Kwala Gunung	118,921	146,433	130,659
PT Sweet Greens Indonesia	47,783	11,482	-
PT Mitra Niaga Cornindo	21,753	23,952	-
PT Mitra Sewatama Raya	11,871	59,534	-
PT Gaharu	68,541	77,106	-
PT Bina Mitra Makmur	137,376	-	-

(dalam juta Rupiah / in million Rupiah)

Debitur Debtor	2023	2022	2021
PT Samudera Parama Avirodha	28,889	31,972	-
Henry Maknawi	23,928	-	-
Total	**623,231**	**794,947**	**602,687**

Penggunaan Material yang Ramah Lingkungan [POJK F.5]

Kegiatan operasional Bank Victoria tidak banyak menggunakan bahan baku, selain untuk keperluan administrasi dan perkantoran. Meskipun demikian, Bank tetap menaruh pertimbangan pada penggunaan material yang ramah lingkungan dari peralatan dan perlengkapan kantor. Bank pun mendorong seluruh karyawan untuk mengurangi penggunaan material sekali pakai yang tidak dapat didaur ulang sebagai salah satu upaya untuk mengurangi volume timbunan sampah di tempat pembuangan akhir. Untuk mendukung kampanye ini, Bank melakukan program-program:

1. Mengganti penyediaan air minum kemasan dengan menyediakan gelas/*tumbler;*
2. Memakai kertas bekas sesuai kebutuhan dan memaksimalkan penyimpanan dokumen dalam bentuk *soft copy;* dan
3. Menggunakan program kantong/*goodie bag* ramah lingkungan dalam berbagai kegiatan acara maupun sebagai *merchandise*/barang promosi ke nasabah;

Use of Environmentally Friendly Material [POJK F.5]

The operational activities of Bank Victoria do not use many raw materials, other than for administrative and office purposes. However, the Bank continues to pay attention to the use of environmentally friendly materials in office equipment and supplies. The Bank also encourages all employees to reduce the use of single-use materials unable to be recycled as an effort to reduce the waste volume piled up in final landfills. To support this campaign, the Bank carries out programs:

1. Replacing the provision of bottled drinking water by providing glasses/tumblers;
2. Using used paper as needed and maximizing storage of documents in the form of soft copies;
3. Using environmentally friendly bag/goodie bag program in various event activities and as merchandise/promotional items to customers;

Efisiensi Penggunaan Energi [POJK F.6] [POJK F.7]

Energi yang digunakan oleh Bank Victoria untuk mendukung operasionalnya terdiri dari listrik dan bahan bakar minyak. Listrik digunakan untuk peralatan elektronik, pendingin ruangan, penerangan, dan kebutuhan *lift*. Sementara itu, bahan bakar minyak digunakan untuk kendaraan operasional. Beberapa upaya penghematan energi yang dilakukan antara lain:

1. Mematikan peralatan elektronik, lampu dan AC yang sedang tidak digunakan;
2. Menggunakan lampu *Light Emitting Diode* (LED) yang lebih hemat energi; dan
3. Mengurangi rapat secara tatap muka dan mengganti dengan rapat *online* untuk mengurangi penggunaan bahan bakar alat transportasi;

Using Energy Efficiently [POJK F.6] [POJK F.7]

Energy used by Bank Victoria to support its operations consists of electricity and fuel oil. Electricity is used for electronic equipment, air conditioning, lighting, and elevator needs. Meanwhile, fuel oil is used for operational vehicles. Some efforts carried out to save energy are as follows:

1. Turn off electronic equipment, lights, and air conditioning when not in use;
2. Use Light Emitting Diode (LED) lamps which are more energy efficient; and
3. Reduce face-to-face meetings and replace them with online meetings to reduce the use of fuel for transportation.

Uraian	Satuan Unit	2023	2022	2021	Description
Listrik	GJ	4,774.83	4,442.55	4,459.18	Electricity
BBM	GJ	2,262.32	2,879.76	2,711.33	Fuel
Total	**GJ**	**7,037.15**	**7,322.31**	**7,170.51**	**Total**

Uraian	Satuan Unit	2023	2022	2021	Description
Intensitas Penggunaan Energi	**GJ/Juta Rp** GJ/Million Rp	0.00383	**0.00448**	**0.00479**	Intensity of Energy Use to Operating Income
Capaian Efisiensi Energi	**GJ/Juta Rp** GJ/Million Rp	0.00064	**0.00031**	**0.00061**	Achievement of Energy Efficiency

Hingga tahun 2023, Bank belum menggunakan energi terbarukan.

Until 2023, the Bank did not use any renewable energy.

Efisiensi Penggunaan Air [POJK F.8]

Bank Victoria menggunakan air untuk kepentingan kantor seperti kebutuhan sanitasi dan rumah tangga kantor. Air yang digunakan Bank bersumber dari air dari Perusahaan Daerah Air Minum (PDAM). Beberapa upaya penghematan air yang dilakukan antara lain:

1. Menggunakan sensor keran otomatis untuk penggunaan air secara efisien;
2. Meningkatkan kesadaran seluruh karyawan akan pentingnya bijak dalam penggunaan air melalui brosur atau imbauan yang telah dibuat di beberapa titik sumber air (keran air);
3. Melakukan pengecekan secara berkala terhadap kondisi keran, *shower*, toilet, dan meteran air, sehingga apabila ada kerusakan, dapat dihindari terjadinya kebocoran yang dapat membuang-buang air.

Informasi terkait penggunaan air dalam 3 (tiga) tahun terakhir diungkapkan sebagai berikut:

Using Water Efficiently [POJK F.8]

Bank Victoria uses water for office purpose such as sanitation needs and office household. The water used by the Bank comes from water from the Regional Drinking Water Company (PDAM). Some efforts carried out to save water include:

1. Using automatic faucet sensor for efficient use of water;
2. Increasing awareness of all employees on the importance of being wise in the use of water through brochures or appeals that have been made at several points of water sources (water taps);
3. Regularly checking the condition of taps, showers, toilets, and water meters, so that if there is damage, leaks which can waste water can be avoided.

Information on water usage in the past 3 (three) years is disclosed as follows:

Uraian	Satuan Unit	2023	2022	2021	Description
Air	m^3	18,746.74	5,494.06	5,756.90	Water
Intensitas Penggunaan Air terhadap Pendapatan Operasional	**m^3/Juta Rp** m^3/Million Rp	0.01021	**0.00336**	**0.00384**	Intensity of Water Use to Operating Income
Capaian Penghematan Air	**m^3/Juta Rp** m^3/Million Rp	(0.00685)	**0.00048**	**0.00070**	Achievement of Water Saving

Pengelolaan Limbah [POJK F.13] [POJK F.14] [POJK F.15]

Sebagai perusahaan yang berkomitmen pada kelestarian lingkungan, Bank berupaya maksimal dalam mengurangi produksi limbah dengan menerapkan prinsip 3R, yaitu *reduce, reuse,* dan *recycle.* Limbah yang dihasilkan Bank merupakan limbah domestik, yang sebagian besar diantaranya berupa limbah kertas. Selain itu, Bank tidak menghasilkan limbah yang termasuk bahan berbahaya dan beracun (B3). Bank juga tidak melakukan pengolahan limbah secara mandiri, melainkan dilakukan oleh pihak pengelola gedung.

Waste Management [POJK F.13] [POJK F.14] [POJK F.15]

As a company committed to environmental sustainability, the Bank makes its utmost efforts to reduce waste production by implementing 3R principles, namely reduce, reuse, and recycle. The waste generated by the Bank is domestic waste, most of which is paper waste. In addition, the Bank does not produce waste which includes hazardous and toxic waste (B3). The waste processing is also not carried out by the Bank independently, but rather carried out by the building management

Berikut informasi penggunaan kertas Bank Victoria dalam 3 (tiga) tahun terakhir:

Information of Bank Victoria's paper use in the past 3 (three) years is as follows:

Uraian	Satuan Unit	2023	2022	2021	Description
Jumlah Kertas Terpakai	Rim	1,935	1,703	1,847	Total Paper Used
	Box	220	169	122	
Pengurangan Penggunaan Kertas	Rim	232	(144)	316	Reduced Paper Use
	Box	51	(47)	143	
Biaya Pengadaan Kertas	Rp	134,935,301	125,015,266	102,428,820	Paper Procurement Cost

Namun demikian, Bank belum melakukan daur ulang limbah di tahun 2023.

However, the Bank has not yet recycled waste in 2023.

Tumpahan yang Terjadi

Sepanjang tahun 2023, tidak terdapat tumpahan limbah yang terjadi yang disebabkan oleh aktivitas Bank.

Spills

Throughout 2023, there were no waste spills caused by the Bank activities.

Keanekaragaman Hayati [POJK F.9] [POJK F.10]

Bank mendukung ruang terbuka hijau di lingkungan operasional Bank, seperti melakukan penempatan pot tanaman di sekitar kantor Bank dan bekerja sama dengan pengelola gedung. Untuk mendukung keanekaragaman hayati, dilakukan penanaman dan pemeliharaan tanaman secara berkelanjutan. Selain itu, wilayah operasional Bank tidak berada pada lokasi yang berdekatan atau bersinggungan dengan area yang dilindungi maupun kawasan yang memiliki keanekaragaman hayati tinggi. Dengan demikian, operasional Bank tidak berdampak negatif terhadap keanekaragaman hayati.

Biodiversity [POJK F.9] [POJK F.10]

The Bank supports green open space in the Bank's operational environment, such as placing plant pots around the Bank's offices and cooperating with building managers. To support biodiversity, planting and maintenance of plants is carried out in a sustainable manner. In addition, the Bank's operational areas are not located near or in contact with protected areas or regions with high biodiversity. Thus, the Bank's operations do not have any negative impact on biodiversity.

Pengendalian Emisi [POJK F.11] [POJK F.12]

Bank menghasilkan emisi dari energi yang digunakan. Untuk melihat dampaknya terhadap lingkungan, pengukuran berkala dilakukan sehingga dapat dipertimbangkan upaya pengurangan emisi yang akan dilakukan. Untuk mengurangi emisi, Bank berupaya melakukan berbagai inisiatif dengan cara:

1. Penempatan tanaman hias di berbagai area Bank untuk meningkatkan oksigen dan menyerap debu;
2. Penghematan penggunaan energi listrik; dan
3. Pengurangan perjalanan dinas dengan memaksimalkan pertemuan secara daring dan memaksimalkan efektivitas penggunaan kendaraan, khususnya untuk perjalanan dinas ke luar kota.

Emission Control [POJK F.11] [POJK F.12]

The Bank produces emissions from the energy used. To see the impact on the environment, periodic measurements are carried out so that emission reduction efforts can be considered. To reduce emissions, the Bank seeks to carry out various initiatives by:

1. Planting trees and ornamental plants in various areas of the Bank to increase oxygen and absorb dust;
2. Saving electrical energy use; and
3. Reducing business trip by maximizing online meetings and maximizing the effectiveness of vehicle use, especially for business trip out of town.

Informasi emisi yang dihasilkan di Bank ditunjukkan sebagai berikut:

Information on emissions generated at the Bank is shown as follows:

Uraian	Satuan Unit	2023	2022	2021	Description
Listrik	$TonCO_2eq$	1,246.76	1,160.00	1,164.34	Electricity
BBM	$TonCO_2eq$	151.70	193.10	181.80	Fuel
Total Emisi	**$TonCO_2eq$**	1,398.46	**1,353.10**	**1,346.14**	**Total Emissions**
Intensitas Emisi	**$TonCO_2eq$/ Juta Rp** $TonCO_2eq$/ Million Rp	0.00076	**0.00083**	**0.00090**	**Emission Intensity**
Capaian Efisiensi Emisi	**$TonCO_2eq$/ Juta Rp** $TonCO_2eq$/ Million Rp	0.00007	**0.00007**	**0.00003**	**Achievement of Emission Effi-ciency**

Sarana Pengaduan terkait Masalah Lingkungan [POJK F.16]

Pada tahun 2023, Bank belum menyediakan sarana pelaporan pengaduan terkait masalah lingkungan mengingat kegiatan usaha yang dijalankan tidak berkaitan langsung dengan lingkungan hidup. Namun demikian, pemangku kepentingan dapat menyampaikan pengaduan apabila kegiatan Bank mengganggu lingkungan hidup melalui email, call center, situs web Bank, ataupun media sosial Bank.

Hingga 3 (tiga) tahun terakhir, Bank tidak menerima pengaduan terkait lingkungan hidup.

Complaint Channel Related to Environmental Issue [POJK F.16]

In 2023, the Bank had not yet provided complaint channel related to environmental issues, considering that business activities are not directly related to the environment. Nevertheless, stakeholders can submit complaints through email, call center, Bank website, or Bank social media, in the event that the Bank's activities disrupt the environment.

Until the last 3 (three) years, the Bank has not received any complaints related to the environment.

Biaya Lingkungan Hidup [POJK F.4]

Bank belum secara spesifik melakukan pembiayaan untuk kegiatan pengelolaan lingkungan hidup. Biaya pengelolaan lingkungan hidup Bank merupakan bagian yang tidak terpisahkan dari biaya operasional Bank.

Environmental Costs [POJK F.4]

The Bank has not specifically financed environmental management activities. The Bank's environmental management costs are an integral part of the Bank's operational costs.

INDEKS PENGUNGKAPAN KRITERIA POJK NO. 51/POJK.03/2017 [G.4]

POJK Criteria Disclosure Index No. 51/POJK.03/2017

No. Indeks No. Index	Nama Indeks Index Name	Halaman Page
STRATEGI KEBERLANJUTAN **SUSTAINABILITY STRATEGY**		
A.1	Penjelasan Strategi Keberlanjutan Explanation of Sustainability Strategy	4
IKHTISAR KINERJA ASPEK KEBERLANJUTAN **PERFORMANCE HIGHLIGHTS OF SUSTAINABILITY ASPECTS**		
B.1	Aspek Ekonomi Economic Aspects	16
B.2	Aspek Lingkungan Hidup Environmental Aspects	19
B.3	Aspek Sosial Social Aspects	19
PROFIL PERUSAHAAN **COMPANY PROFILE**		
C.1	Visi, Misi, dan Nilai Keberlanjutan Vision, Mission, and Sustainability Value	58
C.2	Alamat Perusahaan Company Address	54
C.3	Skala Usaha Business Scale	64; 88; 122; 406
C.4	Produk, Layanan, dan Kegiatan Usaha yang Dijalankan Products, Services, and Business Activities	61; 62
C.5	Keanggotaan pada Asosiasi Membership in Association	70
C.6	Perubahan Emiten dan Perusahaan Publik yang bersifat Signifikan Significant Changes in Issuers and Public Companies	55
PENJELASAN DIREKSI **EXPLANATION FROM THE BOARD OF DIRECTORS**		
D.1	Penjelasan Direksi Explanation from the Board of Directors	40
TATA KELOLA KEBERLANJUTAN **SUSTAINABILITY GOVERNANCE**		
E.1	Penanggung Jawab Penerapan Keuangan Berkelanjutan Person in Charge of Sustainable Finance Implementation	389
E.2	Pengembangan Kompetensi terkait Keuangan Berkelanjutan Competence Development related to Sustainable Finance	390
E.3	Penilaian Risiko atas Penerapan Keuangan Berkelanjutan Risk Assessment of Sustainable Finance Implementation	391
E.4	Hubungan dengan Pemangku Kepentingan Relations with Stakeholders	9
E.5	Permasalahan terhadap Penerapan Keuangan Berkelanjutan Problems in Sustainable Finance Implementation	6-8

No. Indeks No. Index	Nama Indeks Index Name	Halaman Page
KINERJA KEBERLANJUTAN **SUSTAINABILITY PERFORMANCE**		
F.1	Kegiatan Membangun Budaya Keberlanjutan Building a Sustainability Culture	248; 255; 258; 259; 262; 263; 264; 265
KINERJA EKONOMI **ECONOMIC PERFORMANCE**		
F.2	Perbandingan Target dan Kinerja Produksi, Portofolio, Target Pembiayaan, atau Investasi, Pendapatan dan Laba Rugi Comparison of Targets and Performance of Production, Portfolios, Financing Targets, or Investments, Income and Profit and Loss	391
F.3	Perbandingan Target dan Kinerja Portofolio, Target Pembiayaan, atau Investasi pada Instrumen Keuangan atau Proyek yang Sejalan dengan Keuangan Berkelanjutan Comparison of Targets and Performance of Portfolio, Financing Targets, or Investments on Financial Instruments or Projects in Line with Sustainable Finance	391
KINERJA LINGKUNGAN HIDUP **ENVIRONMENTAL PERFORMANCE**		
Aspek Umum **General Aspect**		
F.4	Biaya Lingkungan Hidup Environmental Costs	418
Aspek Material **Material Aspect**		
F.5	Penggunaan Material yang Ramah Lingkungan Use of Environmentally Friendly Material	415
ASPEK ENERGI **ENERGY ASPECT**		
F.6	Jumlah dan Intensitas Energi yang Digunakan Amount and Intensity of Energy Consumed	415-416
F.7	Upaya dan Pencapaian Efisiensi Energi dan Penggunaan Energi Terbarukan Efforts and Achievement of Energy Efficiency and Renewable Energy Consumed	415
Aspek Air **Water Aspect**		
F.8	Penggunaan Air Water Consumption	416
Aspek Keanekaragaman Hayati **Biodiversity Aspect**		
F.9	Dampak dari Wilayah Operasional yang Dekat atau Berada di Daerah Konservasi atau Memiliki Keanekaragaman Hayati Impact of Operational Areas Adjacent to or in Conservation Areas or Areas with Biodiversity	417
F.10	Usaha Konservasi Keanekaragaman Hayati Biodiversity Conservation Effort	417
Aspek Emisi **Emission Aspect**		
F.11	Jumlah dan Intensitas Emisi yang Dihasilkan berdasarkan Jenisnya Amount and Intensity of Emissions Generated by Type	418
F.12	Upaya dan Pencapaian Pengurangan Emisi yang Dilakukan Efforts and Achievements of Emission Reduction Implemented	417
Aspek Limbah dan Efluen **Waste and Effluent Aspect**		
F.13	Jumlah Limbah dan Efluen yang Dihasilkan berdasarkan Jenis Amount of Waste and Effluent Generated by Type	417
F.14	Mekanisme Pengelolaan Limbah dan Efluen Waste and Effluent Management Mechanisms	416
F.15	Tumpahan yang Terjadi (jika ada) Spills (if any)	417

No. Indeks No. Index	Nama Indeks Index Name	Halaman Page
Aspek Pengaduan terkait Lingkungan Hidup **Aspect of Complaints Related to the Environment Aspect of Complaints Related to the Environment**		
F.16	Jumlah dan Materi Pengaduan Lingkungan Hidup yang Diterima dan Diselesaikan Number and Material of Environmental Complaints Received and Resolved	418
KINERJA SOSIAL **SOCIAL PERFORMANCE**		
F.17	Komitmen untuk Memberikan Layanan atas Produk dan/atau Jasa yang Setara kepada Pelanggan Commitment to Providing Equal Products and/or Services to Customers	396
Aspek Ketenagakerjaan **Employment Aspect**		
F.18	Kesetaraan Kesempatan Bekerja Equal Employment Opportunity	402
F.19	Tenaga Kerja Anak dan Tenaga Kerja Paksa Child Labor and Forced Labor	401
F.20	Upah Minimum Regional Regional Minimum Wage	407
F.21	Lingkungan Bekerja yang Layak dan Aman Decent and Safe Work Environment	410
F.22	Pelatihan dan Pengembangan Kemampuan Pegawai Employee Training and Development	403
Aspek Masyarakat **Community Aspect**		
F.23	Dampak Operasi terhadap Masyarakat Sekitar Impact of Operations on Surrounding Community	413
F.24	Pengaduan Masyarakat Community Complaints	413
F.25	Kegiatan Tanggung Jawab Sosial Lingkungan (TJSL) Environmental Social Responsibility Activities	412
TANGGUNG JAWAB PENGEMBANGAN PRODUK/JASA BERKELANJUTAN **RESPONSIBILITY FOR SUSTAINABLE PRODUCT/SERVICE DEVELOPMENT**		
F.26	Inovasi dan Pengembangan Produk/Jasa Keuangan Berkelanjutan Sustainable Finance Products/Services Innovation and Development	397
F.27	Produk/Jasa yang Sudah Dievaluasi Keamanannya bagi Pelanggan Products/Services with Evaluated Customer Safety	399
F.28	Dampak Produk/Jasa Impacts of Products/Services	396
F.29	Jumlah Produk yang Ditarik Kembali Number of Products Recalled	399
F.30	Survei Kepuasan Pelanggan terhadap Produk dan/atau Jasa Keuangan Berkelanjutan Customer Satisfaction Survey on Sustainable Finance Products and/or Services	399
LAIN-LAIN **MISCELLANEOUS**		
G.1	Verifikasi Tertulis dari Pihak Independen (jika ada) Written Verification from Independent Party (if any)	422
G.2	Lembar Umpan Balik Feedback Form	423
G.3	Tanggapan terhadap Umpan Balik Laporan Tahun Sebelumnya Responses to Previous Year's Report Feedback	422
G.4	Daftar Pengungkapan sesuai Peraturan Otoritas Jasa Keuangan No. 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik. List of Disclosures According to Financial Services Authority Regulation No. 51/POJK.03/2017 on Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies.	425

TANGGAPAN TERHADAP UMPAN BALIK LAPORAN TAHUN SEBELUMNYA [G.3]

Responses to Previous Year's Report Feedback

Bank Victoria tidak menerima tanggapan dan umpan balik terhadap Laporan Keberlanjutan Tahun 2022. Namun demikian, Bank Victoria berupaya untuk menyempurnakan isi Laporan Keberlanjutan Tahun 2023 sesuai dengan kinerja keberlanjutan selama tahun pelaporan.

Bank Victoria did not receive any responses and feedback to the 2022 Sustainability Report. Nevertheless, Bank Victoria strives to refine the contents of the 2023 Sustainability Report pursuant to sustainability performance during the reporting year.

VERIFIKASI TERTULIS DARI PIHAK INDEPENDEN [POJK.G.1]

WRITTEN VERIFICATION FROM INDEPENDENT PARTY

Laporan Keberlanjutan ini tidak dilakukan verifikasi oleh penyedia jasa *assurance* eksternal. Namun demikian, Bank menjamin bahwa seluruh informasi yang disampaikan dalam laporan ini adalah benar, akurat, dan faktual.

This Sustainability Report has not been verified by an external assurance service provider. Nonetheless, the Bank guarantees that all information presented in this report is true, accurate, and factual.

LEMBAR UMPAN BALIK [G.2]
Feedback Form

Setelah membaca Laporan Keberlanjutan PT Bank Victoria International Tbk, kami mohon kesediaan para pemangku kepentingan untuk memberikan umpan balik dengan mengirim *e-mail* atau mengirim formulir ini melalui fax/pos.

After reading this Sustainability Report of PT Bank Victoria International Tbk, we would like to ask all stakeholders to kindly provide feedback by sending e-mail or sending this form by fax/mail.

Pertanyaan Questions	Setuju Agree	Tidak Setuju Disagree
Laporan ini telah memberikan informasi yang bermanfaat mengenai kinerja ekonomi, sosial, dan lingkungan perusahaan. This report has provided useful information on economic, social, and environmental performance of the company.	.....	.....
Data dan informasi yang diungkapkan mudah dipahami, lengkap, transparan, dan berimbang. Data and information disclosed are easy to understand, complete, transparent, and balanced.	.....	.....
Data dan informasi yang disajikan berguna dalam pengambilan keputusan. Data and information presented are useful for making decision.	.....	.....
Laporan ini menarik dan mudah dibaca. This report is interesting and easy to read.	.....	.....

Mohon berikan nilai mengenai aspek yang terdapat dalam laporan ini (nilai 1 = paling penting, 2 = penting, 3 = tidak penting, 4 = sangat tidak penting).
Please score on aspects presented in this report (1 = most important, 2 = important, 3 = less important, 4 = least important).

- ☐ Kinerja Ekonomi / Economic Performance
- ☐ Pinjaman UMKM / MSME Loans
- ☐ Pemberian Kredit dengan Pertimbangan Aspek Lingkungan / Providing Loans with the Consideration of Environmental Aspects
- ☐ Kesetaraan Gender dan Kesempatan Kerja yang Adil / Gender Equality and Fair Job Opportunity
- ☐ Pelatihan dan Pendidikan / Training and Education
- ☐ Kesehatan dan Keselamatan Kerja / Occupational Health and Safety
- ☐ Anti-*Fraud* / Anti-Fraud
- ☐ Privasi Nasabah / Customer Privacy
- ☐ Penggunaan Energi / Energy Consumption
- ☐ Penggunaan Air / Water Consumption
- ☐ Pengelolaan Limbah / Waste Treatment
- ☐ Pengembangan Masyarakat / Community Development

Mohon berikan komentar/saran/usulan bagi laporan ini.
Please provide your comments/suggestions/ideas for this report.

.....

.....

.....

Profil Anda / Your Profile

Nama / Name : .....

Pekerjaan / Occupation : .....

Institusi/Perusahaan / Institution/Company : .....

Kontak (telepon, *e-mail*) Contact (telephone, e-mail) : .....

Kategori Pemangku Kepentingan / Category of Stakeholder

- ○ Pemerintah / Government
- ○ Nasabah / Customer
- ○ Karyawan / Employees
- ○ Mitra Usaha / Business Partners
- ○ Media
- ○ Masyarakat / Community
- ○ LSM / NGO
- ○ Lain-Lain, ... / Others, ...

Saran dan tanggapan yang Anda berikan atas informasi yang disajikan dalam laporan ini mohon dikirimkan kepada:
Please send your suggestion and response to the information presented in this report to:

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Kriteria Penyampaian Laporan Tahunan berdasarkan SEOJK No. 16/SEOJK.04/2021

Criteria for Annual Report Submission based on SEOJK No. 16/SEOJK.04/2021

Kriteria Criteria	Penjelasan Explanation	Halaman Page
Ketentuan Umum / General Provisions		
Laporan Tahunan disajikan dalam bentuk dokumen cetak dan dokumen elektronik. The Annual Report is presented in the form of printed documents and electronic documents.		✓
Laporan Tahunan yang disajikan dalam bentuk dokumen cetak, dicetak pada kertas yang berwarna terang, berkualitas baik, berukuran A4, dijilid, dan dapat diperbanyak dengan kualitas yang baik. The Annual Report is presented in hardcopy format, printed on bright colored paper, of good quality, A4 size, bound, and can be reproduced in good quality.		✓
Laporan Tahunan dapat menyajikan informasi berupa gambar, grafik, tabel, dan/atau diagram dengan mencantumkan judul dan/atau keterangan yang jelas, sehingga mudah dibaca dan dipahami. The Annual Report can present information in the form of pictures, graphs, tables and/or diagrams by including clear titles and/or descriptions, so that they are easy to read and understand.		✓
Laporan Tahunan yang disajikan dalam bentuk dokumen elektronik merupakan Laporan Tahunan yang dikonversi dalam *portable document format* (PDF). The Annual Report presented in the form of an electronic document is an Annual Report that is converted in portable document format (PDF).		✓
Isi Laporan Tahunan / Annual Report Contents		
Kilas Kinerja / Performance Highlights		
Ikhtisar data keuangan penting memuat informasi keuangan yang disajikan dalam bentuk perbandingan selama 3 (tiga) tahun buku atau sejak memulai usahanya jika Emiten atau Perusahaan Publik tersebut menjalankan kegiatan usahanya kurang dari 3 (tiga) tahun. Summary of important financial data contains financial information presented in comparative form for 3 (three) financial years or since the business starts if the Issuer or Public Company started its business in less than 3 (three) years ago.	Informasi memuat antara lain: 1. Pendapatan/penjualan; 2. Laba bruto; 3. Laba (rugi); 4. Jumlah laba (rugi) yang dapat diatribusikan kepada pemilik entitas induk dan kepentingan non pengendali; 5. Total laba (rugi) komprehensif; 6. Jumlah laba (rugi) komprehensif yang dapat diatribusikan kepada pemilik entitas induk dan kepentingan non-pengendali; 7. Laba (rugi) per saham; 8. Jumlah aset; 9. Jumlah liabilitas; 10. Jumlah ekuitas; 11. Rasio laba (rugi) terhadap jumlah aset; 12. Rasio laba (rugi) terhadap ekuitas; 13. Rasio laba (rugi) terhadap pendapatan; 14. Rasio lancar; 15. Rasio liabilitas terhadap ekuitas; 16. Rasio liabilitas terhadap jumlah aset; dan 17. Informasi dan rasio keuangan lainnya yang relevan dengan perusahaan dan jenis industrinya. Information includes, among others: 1. Revenue/sales; 2. Gross profit; 3. Profit (loss); 4. Total profit (loss) attributable to owners of the parent entity and non-controlling interests; 5. Total comprehensive profit (loss); 6. Total comprehensive profit (loss) attributable to owners of the parent entity and non-controlling interests; 7. Earnings (loss) per share; 8. Total assets; 9. Total liabilities; 10. Total equity;	14

Kriteria Criteria	Penjelasan Explanation	Halaman Page
	11. Profit (loss) to total assets ratio; 12. Profit (loss) to equity ratio; 13. Profit (loss) to revenue ratio; 14. Current ratio; 15. Liabilities to equity ratio; 16. Liabilities to total assets ratio; and 17. Information and other financial ratios that are relevant to the company and the type of industry.	
Informasi Saham Share Information	Informasi saham bagi Perusahaan Terbuka paling sedikit memuat: 1. Saham yang telah diterbitkan untuk setiap masa triwulan yang disajikan dalam bentuk perbandingan selama 2 (dua) tahun buku terakhir, paling sedikit memuat: a. Jumlah saham yang beredar; b. Kapitalisasi pasar berdasarkan harga pada bursa efek tempat saham dicatatkan; c. Harga saham tertinggi, terendah, dan penutupan berdasarkan harga pada bursa efek tempat saham dicatatkan; dan d. Volume perdagangan pada bursa efek tempat saham dicatatkan. Informasi dalam huruf b), huruf c) dan huruf d) hanya diungkapkan jika sahamnya tercatat di bursa efek; 2. Dalam hal terjadi aksi korporasi yang menyebabkan terjadinya perubahan pada saham, seperti pemecahan saham (*stock split*), penggabungan saham (*reverse stock*), dividen saham, saham bonus, perubahan nilai nominal saham, penerbitan efek konversi, serta penambahan dan pengurangan modal, informasi saham sebagaimana dimaksud pada angka 1) ditambahkan penjelasan paling sedikit mengenai: a. Tanggal pelaksanaan aksi korporasi; b. Rasio pemecahan saham (*stock split*), penggabungan saham (*reverse stock*), dividen saham, saham bonus, jumlah efek konversi yang diterbitkan, dan perubahan nilai nominal saham; c. Jumlah saham beredar sebelum dan sesudah aksi korporasi; d. Jumlah efek konversi yang dilaksanakan (jika ada); dan e. Harga saham sebelum dan sesudah aksi korporasi; 3. Dalam hal terjadi penghentian sementara perdagangan saham (*suspension*) dan/atau pembatalan pencatatan saham (*delisting*) dalam tahun buku, dijelaskan alas an penghentian sementara perdagangan saham (*suspension*) dan/atau pembatalan pencatatan saham (*delisting*) tersebut; dan 4. Dalam hal penghentian sementara perdagangan saham (*suspension*) sebagaimana dimaksud pada angka 3) dan/atau proses pembatalan pencatatan saham (*delisting*) masih berlangsung hingga akhir periode laporan tahunan, dijelaskan tindakan yang dilakukan untuk menyelesaikan penghentian sementara perdagangan saham (*suspension*) dan/atau pembatalan pencatatan saham (*delisting*) tersebut. Information on shares for Public Companies at least contains: 1. Shares that have been issued for each quarter, presented in comparative form for the last 2 (two) financial years, at least contain: a. Number of outstanding shares; b. Market capitalization based on the price on the stock exchange where the shares are listed; c. The highest, lowest, and closing share prices based on the price on the stock exchange where the shares are listed; and d. Trading volume on the stock exchange where the shares are listed. Information in letter b), letter c) and letter d) is only disclosed if the shares are listed on the stock exchange; 2. In the event of a corporate action causing a change in shares, such as stock split, reverse stock, share dividends, bonus shares, changes in the nominal value of shares, issuance of convertible securities, as well as capital increase and decrease, share information as referred to in number 1) shall be added with an explanation of at least: a. The corporate action execution date; b. Ratio of stock split, reverse stock, stock dividends, bonus shares, number of convertible securities issued, and changes in share par value; c. The number of outstanding shares before and after the corporate action; d. The number of convertible securities executed (if any); and e. Share prices before and after corporate actions;	20

Kriteria Criteria	Penjelasan Explanation	Halaman Page
	3. In the event of temporary suspension of share trading and/or delisting of share in the financial year, the reasons for the temporary suspension of share trading and/or delisting of share must be explained; and 4. In the event of temporary suspension of share trading as referred to in number 3) and/or the process of delisting of shares is still ongoing at the end of the annual report period, the actions taken to resolve the temporary suspension of share trading and/or delisting of share must be explained.	
Laporan Direksi dan Dewan Komisaris / Report of the Board of Directors and Board of Commissioners		
Laporan Direksi Board of Directors' Report	Laporan Direksi paling sedikit memuat uraian singkat mengenai: 1. Kinerja Emiten atau Perusahaan Publik, paling sedikit memuat: a. Strategi dan kebijakan strategis Emiten atau Perusahaan Publik; b. Peranan Direksi dalam perumusan strategi dan kebijakan strategis Emiten atau Perusahaan Publik; c. Proses yang dilakukan Direksi untuk memastikan implementasi strategi Emiten atau Perusahaan Publik; d. Perbandingan antara hasil yang dicapai dengan yang ditargetkan Emiten atau Perusahaan Publik; dan e. Kendala yang dihadapi Emiten atau Perusahaan Publik; 2. Gambaran tentang prospek usaha Emiten atau Perusahaan Publik; dan 3. Penerapan tata kelola Emiten atau Perusahaan Publik. The Board of Directors' report contains at least a brief description of: 1. Performance of Issuers or Public Companies, at least includes: a. Issuer's or Public Company's strategy and strategic policies; b. The role of the Board of Directors in formulating the strategy and strategic policies of the Issuer or Public Company; c. The process carried out by the Board of Directors to ensure the implementation of the Issuer's or Public Company's strategy; d. Comparison between the results achieved and those targeted by the Issuer or Public Company; and e. Obstacles faced by Issuers or Public Companies; 2. An overview of the business prospects of the Issuer or Public Company; and 3. Implementation of Issuer or Public Company governance.	40
Laporan Dewan Komisaris Board of Commissioners' Report	Laporan Dewan Komisaris paling sedikit memuat uraian singkat mengenai: 1. Penilaian terhadap kinerja Direksi mengenai pengelolaan Emiten atau Perusahaan Publik, termasuk pengawasan Dewan Komisaris dalam perumusan dan implementasi strategi Emiten atau Perusahaan Publik yang dilakukan oleh Direksi; 2. Pandangan atas prospek usaha Emiten atau Perusahaan Publik yang disusun oleh Direksi; dan 3. Pandangan atas penerapan tata kelola Emiten atau Perusahaan Publik. The Board of Commissioners' report contains at least a brief description of: 1. Assessment of the Board of Directors' performance regarding the management of the Issuer or Public Company, including the Board of Commissioners' oversight in the formulation and implementation of the Issuer's or Public Company's strategy carried out by the Board of Directors; 2. Views on the business prospects of the Issuer or Public Company prepared by the Board of Directors; and 3. Views on the implementation of governance of the Issuer or Public Company.	32
Profil Perusahaan / Company Profile		
1. Nama Emiten atau Perusahaan Publik termasuk apabila terdapat perubahan nama, alasan perubahan, dan tanggal efektif perubahan nama pada tahun buku. Name of Issuer or Public Company including if there is a name change, reasons for the change, and the effective date of the name change in the financial year.		54
2. Akses terhadap Emiten atau Perusahaan Publik termasuk kantor cabang atau kantor perwakilan yang memungkinkan masyarakat dapat memperoleh informasi mengenai Emiten atau Perusahaan Publik. Access to Issuers or Public Companies including branch offices or representative offices that enable the public to obtain information about Issuers or Public Companies.	a. Alamat; b. Nomor telepon; c. Alamat surat elektronik; dan d. Alamat situs web. a. Address; b. Phone number; c. Electronic mail address; and d. Website address.	54

Kriteria Criteria	Penjelasan Explanation	Halaman Page
3. Riwayat singkat Emiten atau Perusahaan Publik. Brief history of Issuer or Public Company.		N/A
4. Visi dan misi Emiten atau Perusahaan Publik serta budaya perusahaan (*corporate culture*) atau nilai-nilai perusahaan. Issuer's or Public Company's vision and mission and corporate culture or corporate values.		58, 60
5. Kegiatan usaha menurut anggaran dasar terakhir, kegiatan usaha yang dijalankan pada tahun buku, serta jenis barang dan/atau jasa yang dihasilkan. Business activities according to the latest articles of association, business activities carried out in the financial year, and types of goods and/or services produced.		61, 62
6. Wilayah operasional Emiten atau Perusahaan Publik; wilayah operasional merupakan wilayah atau daerah pelaksanaan kegiatan operasional atau jangkauan dari kegiatan operasional perusahaan. The operational area of the Issuer or Public Company; operational area is the area or region where the operational activities take place or the coverage area of the company's operational activities.		64, 66
7. Struktur organisasi Emiten atau Perusahaan Publik dalam bentuk bagan, paling sedikit sampai dengan struktur 1 (satu) tingkat di bawah Direksi termasuk komite di bawah Direksi (jika ada) dan komite di bawah Dewan Komisaris, disertai dengan nama dan jabatan. The organizational structure of the Issuer or Public Company in the form of a chart, at least up to 1 (one) level below the Board of Directors including committees under the Board of Directors (if any) and committees under the Board of Commissioners, accompanied by names and positions.		68
8. Daftar keanggotaan asosiasi industri baik dalam skala nasional maupun internasional yang berkaitan dengan penerapan keuangan berkelanjutan. List of industry association memberships both on a national and international scale related to the implementation of sustainable finance.		70
9. Profil Direksi. Board of Directors' Profile.	a. Nama dan jabatan yang sesuai dengan tugas dan tanggung jawab; b. Foto terbaru; c. Usia; d. Kewarganegaraan; e. Riwayat pendidikan dan/atau sertifikasi; f. Riwayat jabatan, meliputi informasi: 1) Dasar hukum pengangkatan sebagai anggota Direksi pada Emiten atau Perusahaan Publik yang bersangkutan; 2) Rangkap jabatan, baik sebagai anggota Direksi, anggota Dewan Komisaris, dan/atau anggota komite serta jabatan lainnya baik di dalam maupun di luar Emiten atau Perusahaan Publik. Dalam hal anggota Direksi tidak memiliki rangkap jabatan, maka diungkapkan mengenai hal tersebut; dan 3) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; g. Hubungan afiliasi dengan anggota Direksi lainnya, anggota Dewan Komisaris, pemegang saham utama, dan pengendali baik langsung maupun tidak langsung sampai kepada pemilik individu, meliputi nama pihak yang terafiliasi. Dalam hal anggota Direksi tidak memiliki hubungan afiliasi, maka Emiten atau Perusahaan Publik mengungkapkan hal tersebut; dan h. Perubahan komposisi anggota Direksi dan alasan perubahannya. Dalam hal tidak terdapat perubahan komposisi anggota Direksi, maka diungkapkan mengenai hal tersebut.	74

Kriteria Criteria	Penjelasan Explanation	Halaman Page
	a. Name and position according to duties and responsibilities; b. Latest photos; c. Age; d. Citizenship; e. Educational history and/or certification; f. Position history, including information on: 1) The legal basis of appointment as a member of the Board of Directors of the Issuer or Public Company concerned; 2) Concurrent positions, as members of the Board of Directors, members of the Board of Commissioners, and/or committee members as well as other positions inside and outside the Issuer or Public Company. In the event that members of the Board of Directors do not have concurrent positions, then this shall be disclosed; and 3) Work experience and time period inside and outside the Issuer or Public Company; g. Affiliation with other members of the Board of Directors, members of the Board of Commissioners, major and controlling shareholders, either directly or indirectly up to individual owners, including names of affiliated parties. In the event that members of the Board of Directors have no affiliation, then the Issuer or Public Company shall disclose this matter; and h. Changes in the composition of members of the Board of Directors and reasons for the changes. In the event that there is no change in the composition of the members of the Board of Directors, this shall be disclosed.	
10. Profil Dewan Komisaris. Board of Commissioners' Profile.	a. Nama dan jabatan; b. Foto terbaru; c. Usia; d. Kewarganegaraan; e. Riwayat pendidikan dan/atau sertifikasi; f. Riwayat jabatan, meliputi informasi: 1) Dasar hukum pengangkatan sebagai anggota dewan komisaris; 2) Dasar hukum pengangkatan pertama kali sebagai anggota dewan komisaris yang merupakan komisaris independen pada emiten atau perusahaan publik yang bersangkutan; 3) Rangkap jabatan, baik sebagai anggota dewan komisaris, anggota direksi, dan/atau anggota komite serta jabatan lainnya baik di dalam maupun di luar emiten atau perusahaan Publik. Dalam hal anggota Dewan Komisaris tidak memiliki rangkap jabatan, maka diungkapkan mengenai hal tersebut; dan 4) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; g. Hubungan afiliasi dengan anggota Dewan Komisaris lainnya, pemegang saham utama, dan pengendali baik langsung maupun tidak langsung sampai kepada pemilik individu, meliputi nama pihak yang terafiliasi; Dalam hal anggota Dewan Komisaris tidak memiliki hubungan afiliasi, maka Emiten atau Perusahaan Publik mengungkapkan hal tersebut; h. Pernyataan independensi komisaris independent dalam hal komisaris independen telah menjabat lebih dari 2 (dua) periode; dan i. Perubahan komposisi anggota Dewan Komisaris dan alasan perubahannya. Dalam hal tidak terdapat perubahan komposisi anggota Dewan Komisaris, maka diungkapkan mengenai hal tersebut. a. Name and position; b. Latest photos; c. Age; d. Citizenship; e. Educational history and/or certification; f. Position history, including information on: 1) Legal basis of appointment as a member of the board of commissioners; 2) The legal basis for the first appointment as a member of the board of commissioners who is an independent commissioner at the issuer or public company concerned; 3) Concurrent positions, as members of the board of commissioners, members of the board of directors, and/or committee members as well as other positions inside and outside the issuer or public company. In the event that members of the Board of Commissioners do not have concurrent positions, then this shall be disclosed; and 4) Work experience and time period inside and outside the Issuer or Public Company;	71

Kriteria Criteria	Penjelasan Explanation	Halaman Page
	g. Affiliation with other members of the Board of Commissioners, major and controlling shareholders, either directly or indirectly up to individual owners, including names of affiliated parties; In the event that members of the Board of Commissioners have no affiliation, the Issuer or Public Company shall disclose this matter; h. Statement of independency of the independent commissioner in the event that the independent commissioner has served more than 2 (two) periods; and i. Changes in the composition of members of the Board of Commissioners and reasons for changes. In the event that there is no change in the composition of the members of the Board of Commissioners, this shall be disclosed.	
11. Dalam hal terdapat perubahan susunan anggota Direksi dan/atau anggota Dewan Komisaris yang terjadi setelah tahun buku berakhir sampai dengan batas waktu penyampaian Laporan Tahunan, susunan yang dicantumkan dalam Laporan Tahunan adalah susunan anggota Direksi dan/atau anggota Dewan Komisaris yang terakhir dan sebelumnya. In the event that there is a change in the composition of members of the Board of Directors and/or members of the Board of Commissioners that occurs after the end of the financial year until the deadline for submitting the Annual Report, the composition included in the Annual Report is the last and previous composition of members of the Board of Directors and/or members of the Board of Commissioners.		73, 79
12. Jumlah karyawan menurut jenis kelamin, jabatan, usia, tingkat pendidikan, dan status ketenagakerjaan (tetap/kontrak) dalam tahun buku. Number of employees by gender, position, age, educational level, and employment status (permanent/contract) in the financial year.	Pengungkapan informasi dapat disajikan dalam bentuk tabel. Disclosure of information can be presented in tabular form.	406
13. Nama pemegang saham dan persentase kepemilikan pada awal dan akhir tahun buku. Name of shareholder and ownership percentage at the beginning and end of the financial year.	a. Pemegang saham yang memiliki 5% (lima persen) atau lebih saham Emiten atau Perusahaan Publik; b. Anggota Direksi dan anggota Dewan Komisaris yang memiliki saham Emiten atau Perusahaan Publik. Dalam hal seluruh anggota Direksi dan/atau seluruh anggota Dewan Komisaris tidak memiliki saham, maka diungkapkan mengenai hal tersebut; dan c. Kelompok pemegang saham masyarakat, yaitu kelompok pemegang saham yang masing-masing memiliki kurang dari 5% (lima persen) saham Emiten atau Perusahaan Publik. Informasi di atas dapat disajikan dalam bentuk tabel. a. Shareholders who own 5% (five percent) or more shares of the Issuer or Public Company; b. Members of the Board of Directors and members of the Board of Commissioners who own shares of Issuers or Public Companies. In the event that all members of the Board of Directors and/or all members of the Board of Commissioners do not own shares, this shall be disclosed; and c. Group of public shareholders, namely groups of shareholders who each own less than 5% (five percent) of the shares of the Issuer or Public Company. The above information can be presented in tabular form.	88
14. Persentase kepemilikan tidak langsung atas saham Emiten atau Perusahaan Publik oleh anggota Direksi dan anggota Dewan Komisaris pada awal dan akhir tahun buku, termasuk informasi mengenai pemegang saham yang terdaftar dalam daftar pemegang saham untuk kepentingan kepemilikan tidak langsung anggota Direksi dan anggota Dewan Komisaris. Percentage of indirect ownership of Issuer or Public Company shares by members of the Board of Directors and members of the Board of Commissioners at the beginning and end of the financial year, including information regarding shareholders who are registered in the shareholders register for the benefit of indirect ownership by members of the Board of Directors and members of the Board of Commissioners.	Dalam hal seluruh anggota Direksi dan/atau seluruh anggota Dewan Komisaris tidak memiliki kepemilikan tidak langsung atas saham Emiten atau Perusahaan Publik, maka diungkapkan mengenai hal tersebut. In the event that all members of the Board of Directors and/or all members of the Board of Commissioners do not have indirect ownership of shares of Issuer or Public Company, then this matter shall be disclosed.	89

Kriteria Criteria	Penjelasan Explanation	Halaman Page
15. Jumlah pemegang saham dan persentase kepemilikan per akhir tahun buku berdasarkan klasifikasi: Number of shareholders and ownership percentage at the end of the financial year based on classification:	a. Kepemilikan institusi lokal; b. Kepemilikan institusi asing; c. Kepemilikan individu lokal; dan d. Kepemilikan individu asing; a. Ownership of local institutions; b. Ownership of foreign institutions; c. Ownership of local individuals; and d. Ownership of foreign individuals;	90
16. Informasi mengenai pemegang saham utama dan pengendali Emiten atau Perusahaan Publik, baik langsung maupun tidak langsung, sampai kepada pemilik individu, yang disajikan dalam bentuk skema atau bagan. Information regarding major and controlling shareholders of Issuers or Public Companies, either directly or indirectly, up to individual owners, presented in the form of a schematic or chart.		91
17. Nama entitas anak, perusahaan asosiasi, perusahaan ventura bersama dimana Emiten atau Perusahaan Publik memiliki pengendalian bersama entitas (jika ada), beserta persentase kepemilikan saham, bidang usaha, total aset, dan status operasi entitas anak, perusahaan asosiasi, perusahaan ventura bersama. Names of subsidiaries, associated companies, joint venture companies where the Issuer or Public Company has joint control of an entity (if any), along with share ownership percentage, line of business, total assets, and operating status of subsidiaries, associated companies, joint venture companies.	Untuk entitas anak, ditambahkan informasi mengenai alamat entitas anak tersebut. For subsidiaries, information regarding the address of subsidiary is added.	92
18. Kronologis pencatatan saham, jumlah saham, nilai nominal, dan harga penawaran dari awal pencatatan hingga akhir tahun buku serta nama bursa efek di mana saham Emiten atau Perusahaan Publik dicatatkan, termasuk pemecahan saham (*stock split*), penggabungan saham (*reverse stock*), dividen saham, saham bonus, dan perubahan nilai nominal saham, pelaksanaan efek konversi, pelaksanaan penambahan dan pengurangan modal (jika ada); Chronology of share listing, number of shares, nominal value, and offering price from the beginning of listing to the end of the financial year as well as the name of the stock exchange where the Issuer's or Public Company's shares are listed, including stock split, reverse stock, share dividends, bonus shares, and changes in the nominal value of shares, exercise of convertible securities, capital increase and decrease (if any);		93
19. Informasi pencatatan efek lainnya selain efek sebagaimana dimaksud pada angka 18), yang belum jatuh tempo pada tahun buku paling sedikit memuat nama efek, tahun penerbitan, tingkat suku bunga/imbal hasil, tanggal jatuh tempo, nilai penawaran, dan peringkat efek (jika ada). Information on the listing of other securities besides the securities referred to in number 18), which have not yet matured in the financial year, at least contains the name of the securities, year of issuance, interest/yield rate, maturity date, offering price, and securities rating (if any).		94

Kriteria Criteria	Penjelasan Explanation	Halaman Page
20. Informasi penggunaan jasa akuntan publik (AP) dan kantor akuntan publik (KAP) beserta jaringan/asosiasi/aliansinya. Information on the use of services from public accounting (AP) and public accounting firm (KAP) and their networks/associations/alliances.	a. Nama dan alamat; b. Periode penugasan; c. Informasi jasa audit dan/atau non audit yang diberikan; d. Biaya jasa (*fee*) audit dan/atau non audit untuk masing-masing penugasan yang diberikan selama tahun buku; dan e. Dalam hal AP dan KAP beserta jaringan/asosiasi/aliansinya, yang ditunjuk tidak memberikan jasa non audit, maka diungkapkan mengenai informasi tersebut. Pengungkapan informasi penggunaan jasa AP dan KAP beserta jaringan/asosiasi/aliansinya dapat disajikan dalam bentuk tabel. a. Name and address; b. Assignment period; c. Information on audit and/or non-audit services provided; d. Audit and/or non-audit service fees for each assignment given during the financial year; and e. In the event that the designated AP and KAP and their network/association/alliance do not provide non-audit services, the information shall be disclosed. Disclosure of information on the use of AP and KAP services and their networks/associations/alliances can be presented in tabular form.	97
21. Nama dan alamat lembaga dan/atau profesi penunjang pasar modal selain AP dan KAP. Profile. Names and addresses of capital market supporting institutions and/or professions other than AP and KAP.		98
Analisis dan Pembahasan Manajemen / Management Discussion and Analysis		
Analisis dan pembahasan manajemen memuat analisis dan pembahasan mengenai laporan keuangan dan informasi penting lainnya dengan penekanan pada perubahan material yang terjadi dalam tahun buku. Management discussion and analysis contains discussion and analysis of financial statements and other important information with an emphasis on material changes that occurred during the financial year.		
1. Tinjauan operasi per segmen usaha sesuai dengan jenis industri Emiten atau Perusahaan Publik. Overview of operations per business segment according to the type of industry of the Issuer or Public Company.	a. Produksi, yang meliputi proses, kapasitas, dan perkembangannya; b. Pendapatan/penjualan; dan c. Profitabilitas. a. Production, which includes process, capacity, and development; b. Revenue/sales; and c. Profitability.	110
2. Kinerja keuangan komprehensif yang mencakup perbandingan kinerja keuangan dalam 2 (dua) tahun buku terakhir, penjelasan tentang penyebab adanya perubahan dan dampak perubahan tersebut. Comprehensive financial performance which includes a comparison of financial performance in the last 2 (two) financial years, with explanation of causes of changes and impact of changes.	a. Aset lancar, aset tidak lancar, dan total aset; b. Liabilitas jangka pendek, liabilitas jangka panjang, dan total liabilitas; c. Ekuitas; d. Pendapatan/penjualan, beban, laba (rugi), penghasilan komprehensif lain, dan total laba (rugi) komprehensif; dan e. Arus kas. a. Current assets, non-current assets, and total assets; b. Current liabilities, non-current liabilities, and total liabilities; c. Equity; d. Revenue/sales, expenses, profit (loss), other comprehensive income, and total comprehensive profit (loss); and e. Cash flows.	112
3. Kemampuan membayar utang atau kewajiban dengan menyajikan perhitungan rasio yang relevan. Profile. Debt or liabilities service ability by presenting the calculation of relevant ratio.		128
4. Tingkat kolektibilitas piutang Emiten atau Perusahaan Publik dengan menyajikan perhitungan rasio yang relevan. Receivables turnover ratio of the Issuer or Public Company by presenting calculation of relevant ratio.		128

Kriteria Criteria	Penjelasan Explanation	Halaman Page
5. Struktur modal (*capital structure*) dan kebijakan manajemen atas struktur modal (*capital structure*) tersebut disertai dasar penentuan kebijakan dimaksud. Capital structure and management policy on capital structure accompanied by the basis for determining the said policy.		131
6. Bahasan mengenai ikatan yang material untuk investasi barang modal. Discussion on material commitments for capital goods investment.	a. Tujuan dari ikatan tersebut; b. Sumber dana yang diharapkan untuk memenuhi ikatan tersebut; c. Mata uang yang menjadi denominasi; dan d. Langkah yang direncanakan Emiten atau Perusahaan Publik untuk melindungi risiko dari posisi mata uang asing yang terkait. a. The purpose of the commitment; b. The source of funds expected to fulfill the said commitment; c. The currency; and d. Steps planned by the Issuer or Public Company to protect against risks from related foreign currency positions.	132
7. Bahasan mengenai investasi barang modal yang direalisasikan dalam tahun buku terakhir. Discussion on capital goods investment realized in the last financial year.	a. Jenis investasi barang modal; b. Tujuan investasi barang modal; dan c. Nilai investasi barang modal yang dikeluarkan. a. Type of capital goods investment; b. The purpose of capital goods investment; and c. The value of capital goods investment.	132
8. Informasi dan fakta material yang terjadi setelah tanggal laporan akuntan (jika ada). Information and material facts that occurred after the date of the accountant's report (if any).		136
9. Prospek usaha dari Emiten atau Perusahaan Publik dikaitkan dengan kondisi industri, ekonomi secara umum dan pasar internasional disertai data pendukung kuantitatif dari sumber data yang layak dipercaya. The business prospects of Issuers or Public Companies connected to industry conditions, the general economy and international markets accompanied by quantitative supporting data from reliable data sources.		119
10. Perbandingan antara target/proyeksi pada awal tahun buku dengan hasil yang dicapai (realisasi). Comparison between targets/projections at the beginning of financial year and the results achieved (realization).	a. Pendapatan/penjualan; b. Laba (rugi); c. Struktur modal (*capital structure*); atau d. Hal lainnya yang dianggap penting bagi Emiten atau Perusahaan Publik. a. Revenue/sales; b. Profit (loss); c. Capital structure; or d. Other matters deemed important by the Issuer or Public Company.	133
11. Target/proyeksi yang ingin dicapai Emiten atau Perusahaan Publik untuk 1 (satu) tahun mendatang. Targets/projections to be achieved by the Issuer or Public Company for the next 1 (one) year.	a. Pendapatan/penjualan; b. Laba (rugi); c. Struktur modal (*capital structure*); d. Kebijakan dividen; atau e. Hal lainnya yang dianggap penting bagi Emiten atau Perusahaan Publik. a. Revenue/sales; b. Profit (loss); c. Capital structure; d. Dividend policy; or e. Other matters deemed important by the Issuer or Public Company.	134
12. Aspek pemasaran atas barang dan/atau jasa Emiten atau Perusahaan Publik, paling sedikit mengenai strategi pemasaran dan pangsa pasar. Marketing aspects of the Issuer's or Public Company's goods and/or services, at least regarding marketing strategy and market share.		107

Kriteria Criteria	Penjelasan Explanation	Halaman Page
13. Uraian mengenai dividen selama 2 (dua) tahun buku terakhir. Description of dividends for the last 2 (two) financial years.	a. Kebijakan dividen, antara lain memuat informasi persentase jumlah dividen yang dibagikan terhadap laba bersih; b. Tanggal pembayaran dividen kas dan/atau tanggal distribusi dividen non kas; c. Jumlah dividen per saham (kas dan/atau non kas); dan d. Jumlah dividen per tahun yang dibayar. Pengungkapan informasi dapat disajikan dalam bentuk tabel. Dalam hal Emiten atau Perusahaan Publik tidak membagikan dividen dalam 2 (dua) tahun terakhir, maka diungkapkan mengenai hal tersebut. a. Dividend policy, including information on the percentage of the amount of dividends distributed to net profit; b. Cash dividend payment date and/or non-cash dividend distribution date; c. Total dividend per share (cash and/or non-cash); and d. The amount of dividends per year paid. Disclosure of information can be presented in tabular form. In the event that the Issuer or Public Company has not distributed dividends in the last 2 (two) years, this shall be disclosed.	137
14. Realisasi penggunaan dana hasil penawaran umum. Realization of the use of proceeds from the public offering.	a. Dalam hal selama tahun buku, Emiten memiliki kewajiban menyampaikan laporan realisasi penggunaan dana, maka diungkapkan realisasi penggunaan dana hasil penawaran umum secara kumulatif sampai dengan akhir tahun buku; dan b. Dalam hal terdapat perubahan penggunaan dana sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan mengenai laporan realisasi penggunaan dana hasil penawaran umum, maka Emiten menjelaskan perubahan tersebut. a. In the event that during the financial year, the Issuer has an obligation to submit a report on the realization of use of proceeds, then the cumulative realization of the use of proceeds from the public offering until the end of the financial year shall be disclosed; and b. In the event that there is a change in the use of proceeds as stipulated in the Financial Services Authority Regulation regarding the report on realization of use of proceeds from a public offering, the Issuer shall explain such change.	137
15. Informasi material (jika ada), antara lain mengenai investasi, ekspansi, divestasi, penggabungan/peleburan usaha, akuisisi, restrukturisasi utang/modal, transaksi material, transaksi afiliasi, dan transaksi benturan kepentingan, yang terjadi pada tahun buku. Material information (if any), including investment, expansion, divestment, business merger/consolidation, acquisition, debt/capital restructuring, material transactions, affiliate transactions, and conflict of interest transactions, which occurred in the financial year.	a. Tanggal, nilai, dan objek transaksi; b. Nama pihak yang melakukan transaksi; c. Sifat hubungan afiliasi (jika ada); d. Penjelasan mengenai kewajaran transaksi; e. Pemenuhan ketentuan terkait; dan f. Dalam hal terdapat hubungan afiliasi, selain mengungkapkan informasi sebagaimana dimaksud dalam huruf a) sampai dengan huruf e), emiten atau perusahaan publik juga mengungkapkan informasi: 1) Pernyataan direksi bahwa transaksi afiliasi telah melalui prosedur yang memadai untuk memastikan bahwa transaksi afiliasi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum antara lain dilakukan dengan memenuhi prinsip transaksi yang wajar (*armslength principle*); dan 2) Peran dewan komisaris dan komite audit dalam melakukan prosedur yang memadai untuk memastikan bahwa transaksi afiliasi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum antara lain dilakukan dengan memenuhi prinsip transaksi yang wajar (*armslength principle*); g. Untuk transaksi afiliasi atau transaksi material yang merupakan kegiatan usaha yang dijalankan dalam rangka menghasilkan pendapatan usaha dan dijalankan secara rutin, berulang, dan/atau berkelanjutan, ditambahkan penjelasan bahwa transaksi afiliasi atau transaksi material tersebut merupakan kegiatan usaha yang dijalankan dalam rangka menghasilkan pendapatan usaha dan dijalankan secara rutin, berulang, dan/atau berkelanjutan; Dalam hal transaksi afiliasi atau transaksi material dimaksud telah diungkapkan dalam laporan keuangan tahunan, ditambahkan informasi mengenai rujukan pengungkapan dalam laporan keuangan tahunan tersebut. h. Untuk pengungkapan transaksi afiliasi dan/atau transaksi benturan kepentingan yang merupakan hasil pelaksanaan transaksi afiliasi dan/atau transaksi benturan kepentingan yang telah disetujui pemegang saham independen, ditambahkan informasi mengenai tanggal pelaksanaan rups yang menyetujui transaksi afiliasi dan/atau transaksi benturan kepentingan tersebut; dan i. Dalam hal tidak terdapat transaksi afiliasi dan/atau transaksi benturan kepentingan, maka diungkapkan mengenai hal tersebut.	138

Kriteria Criteria	Penjelasan Explanation	Halaman Page
	a. Transaction date, value, and object; b. The name of the party making the transaction; c. Nature of affiliate relationship (if any); d. Explanation of the fairness of transaction; e. Fulfillment of related provisions; and f. In the event that there is an affiliation relationship, apart from disclosing the information referred to in letter a) through letter e), the issuer or public company shall also disclose information on: 1) The statement of the board of directors that the affiliated transactions have gone through adequate procedures to ensure that the affiliated transactions are carried out in accordance with the generally accepted business practices, among others, conducted according to fair transaction principles (arm's length principle); and 2) The role of the board of commissioners and audit committee in carrying out adequate procedures to ensure that the affiliated transactions are carried out in accordance with the generally accepted business practices, among others, conducted according to fair transaction principles (arm's length principle); g. For affiliate transactions or material transactions which are business activities carried out in order to generate business income and are carried out routinely, repeatedly, and/or continuously, an explanation is added that the affiliated transactions or material transactions are business activities carried out in order to generate business income and are carried out routinely, repeatedly, and/or continuously; In the event that the affiliated transactions or material transactions referred to have been disclosed in the annual financial statements, information is added regarding references to disclosure in the said annual financial statements. h. For disclosure of affiliated transactions and/or conflict of interest transactions which are the result of executing affiliated transactions and/or conflict of interest transactions that have been approved by independent shareholders, information is added regarding the date of the GMS that approves the said affiliated transactions and/or conflict of interest transactions; and i. In the event that there are no affiliated transactions and/or conflict of interest transactions, this shall be disclosed.	
16.Perubahan ketentuan peraturan perundang-undangan yang berpengaruh signifikan terhadap Emiten atau Perusahaan Publik dan dampaknya terhadap laporan keuangan (jika ada). Amendments to provisions of laws and regulations that have a significant impact on the Issuer or Public Company and the impact on the financial statements (if any).		150
17.Perubahan kebijakan akuntansi, alasan dan dampaknya terhadap laporan keuangan (jika ada). Changes to accounting policies, reasons, and their impact on financial statements (if any).		150
Tata Kelola Emiten atau Perusahaan Publik / Governance of Issuers or Public Companies		
1. Rapat Umum Pemegang Saham (RUPS). General Meeting of Shareholders (GMS).	a. Informasi mengenai keputusan RUPS pada tahun buku dan 1 (satu) tahun sebelum tahun buku meliputi: 1) keputusan RUPS pada tahun buku dan 1 (satu) tahun sebelum tahun buku yang direalisasikan pada tahun buku; dan 2) keputusan RUPS pada tahun buku dan 1 (satu)tahun sebelum tahun buku yang belum direalisasikan beserta alasan belum direalisasikan; b. Dalam hal Emiten atau Perusahaan Publik menggunakan pihak independen dalam pelaksanaan RUPS untuk melakukan perhitungan suara, maka diungkapkan mengenai hal tersebut. a. Information regarding GMS resolutions in the financial year and 1 (one) year before the financial year that includes: 1) GMS resolutions in the financial year and 1 (one) year prior to the financial year realized in the financial year; and 2) GMS resolutions in the financial year and 1 (one) year prior to the financial year which have not been realized and the reasons for not being realized; b. In the event that an Issuer or Public Company uses an independent party in the implementation of the GMS to count the votes, this matter shall be disclosed.	168

Kriteria Criteria	Penjelasan Explanation	Halaman Page
2. Direksi. Board of Directors.	a. Tugas dan tanggung jawab masing-masing anggota Direksi; Informasi mengenai tugas dan tanggung jawab masing-masing anggota Direksi diuraikan dan dapat disajikan dalam bentuk tabel; b. Pernyataan bahwa Direksi memiliki pedoman atau piagam (*charter*) Direksi; c. Kebijakan dan pelaksanaan frekuensi rapat Direksi, rapat Direksi bersama Dewan Komisaris, dan tingkat kehadiran anggota Direksi dalam rapat tersebut termasuk kehadiran dalam RUPS; Informasi tingkat kehadiran anggota Direksi dalam rapat Direksi, rapat Direksi bersama Dewan Komisaris, atau RUPS dapat disajikan dalam bentuk tabel. d. Pelatihan dan/atau peningkatan kompetensi anggota Direksi: 1) Kebijakan pelatihan dan/atau peningkatan kompetensi anggota Direksi, termasuk program orientasi bagi anggota Direksi yang baru diangkat (jika ada); dan 2) Pelatihan dan/atau peningkatan kompetensi yang diikuti anggota Direksi dalam tahun buku (jika ada); e. Penilaian Direksi terhadap kinerja komite yang mendukung pelaksanaan tugas Direksi pada tahun buku paling sedikit memuat: 1) Prosedur penilaian kinerja; dan 2) Kriteria yang digunakan seperti capaian kinerja selama tahun buku, kompetensi dan kehadiran dalam rapat; dan f. Dalam hal Emiten atau Perusahaan Publik tidak memiliki komite yang mendukung pelaksanaan tugas Direksi, maka diungkapkan mengenai hal tersebut. a. Duties and responsibilities of each member of the Board of Directors; Information regarding the duties and responsibilities of each member of the Board of Directors is described and can be presented in tabular form; b. Statement that the Board of Directors has Board of Directors guidelines or charter; c. Policy and frequency of Board of Directors' meetings, Board of Directors' joint meetings with the Board of Commissioners, and the attendance level of Board of Directors' members at these meetings including attendance at the GMS; Information on the attendance level of Board of Directors' members at Board of Directors' meetings, Board of Directors' joint meetings with the Board of Commissioners, or the GMS can be presented in tabular form. d. Training and/or competency development for Board of Directors' members: 1) Policy on training and/or competency development for Board of Directors' members, including an orientation program for newly appointed members of the Board of Directors (if any); and 2) Training and/or competency development programs attended by the Board of Directors' members in the financial year (if any); e. The Board of Directors' assessment of the performance of committees that support the implementation of Board of Directors' duties in the financial year that contains at least: 1) Performance assessment procedures; and 2) The criteria used such as performance achievements during the financial year, competence, and attendance at meetings; and f. In the event that the Issuer or Public Company does not have a committee that supports the implementation of Board of Directors' duties, this shall be disclosed.	177
3. Dewan Komisaris. Board of Commissioners.	a. Tugas dan tanggung jawab Dewan Komisaris; b. Pernyataan bahwa Dewan Komisaris memiliki pedoman atau piagam (*charter*) Dewan Komisaris; c. Kebijakan dan pelaksanaan frekuensi rapat Dewan Komisaris, rapat Dewan Komisaris bersama Direksi dan tingkat kehadiran anggota Dewan Komisaris dalam rapat tersebut termasuk kehadiran dalam RUPS; Informasi tingkat kehadiran anggota Dewan Komisaris dalam rapat Dewan Komisaris, rapat Dewan Komisaris bersama Direksi, atau RUPS dapat disajikan dalam bentuk tabel. d. Pelatihan dan/atau peningkatan kompetensi anggota Dewan Komisaris: 1) Kebijakan pelatihan dan/atau peningkatan kompetensi anggota Dewan Komisaris, termasuk program orientasi bagi anggota Dewan Komisaris yang baru diangkat (jika ada); dan 2) Pelatihan dan/atau peningkatan kompetensi yang diikuti anggota Dewan Komisaris dalam tahun buku (jika ada);	171

Kriteria Criteria	Penjelasan Explanation	Halaman Page
	e. Penilaian kinerja Direksi dan Dewan Komisaris serta masing-masing anggota Direksi dan anggota Dewan Komisaris, paling sedikit memuat: 1) Prosedur pelaksanaan penilaian kinerja; 2) Kriteria yang digunakan seperti capaian kinerja selama tahun buku, kompetensi dan kehadiran dalam rapat; dan 3) Pihak yang melakukan penilaian; dan f. Penilaian Dewan Komisaris terhadap kinerja Komite yang mendukung pelaksanaan tugas Dewan Komisaris pada tahun buku meliputi: 1) Prosedur penilaian kinerja; dan 2) Kriteria yang digunakan seperti capaian kinerja selama tahun buku, kompetensi dan kehadiran dalam rapat. a. Duties and responsibilities of the Board of Commissioners; b. Statement that the Board of Commissioners has Board of Commissioners guidelines or charter; c. Policy and frequency of Board of Commissioners' meetings, Board of Commissioners' joint meetings with the Board of Directors, and the attendance level of Board of Commissioners' members at these meetings including attendance at the GMS; Information on the attendance level of Board of Commissioners' members at Board of Commissioners' meetings, meetings between the Board of Commissioners and the Board of Directors, or the GMS can be presented in tabular form. d. Training and/or competency development for Board of Commissioners' members: 1) Policy on training and/or competency development for Board of Commissioners' members, including an orientation program for newly appointed members of the Board of Commissioners (if any); and 2) Training and/or competency development programs attended by the Board of Commissioners' members in the financial year (if any); e. Assessment of the Board of Directors' performance and the Board of Commissioners as well as of each member of the Board of Directors and the Board of Commissioners, that contains at least: 1) Performance assessment procedures 2) The criteria used such as performance achievements during the financial year, competence, and attendance at meetings; and 3) The assessor; and f. The Board of Commissioners' assessment of the performance of Committees that support the implementation of Board of Commissioners' duties in the financial year that contains at least: 1) Performance assessment procedures; and 2) The criteria used such as performance achievements during the financial year, competence, and attendance at meetings.	
4. Nominasi dan remunerasi Direksi dan Dewan Komisaris. Nomination and remuneration of the Board of Directors and Board of Commissioners.	a. Prosedur nominasi, meliputi uraian singkat mengenai kebijakan dan proses nominasi anggota Direksi dan/atau anggota Dewan Komisaris; dan b. Prosedur dan pelaksanaan remunerasi Direksi dan Dewan Komisaris, antara lain: 1) prosedur penetapan remunerasi Direksi dan Dewan Komisaris; 2) struktur remunerasi Direksi dan Dewan Komisaris seperti, gaji, tunjangan, tantiem/bonus dan lainnya; dan 3) besarnya remunerasi masing-masing anggota Direksi dan anggota Dewan Komisaris; Pengungkapan informasi dapat disajikan dalam bentuk tabel. a. Nomination procedures, including a brief description of the policies and nomination process for members of the Board of Directors and/or members of the Board of Commissioners; and b. Procedures and implementation of remuneration for the Board of Directors and Board of Commissioners, including: 1) procedures for determining remuneration for the Board of Directors and Board of Commissioners; 2) remuneration structure for the Board of Directors and Board of Commissioners such as salaries, allowances, tantiem/bonuses, and others; and 3) remuneration amount for each member of the Board of Directors and members of the Board of Commissioners; Disclosure of information can be presented in tabular form.	193

Kriteria Criteria	Penjelasan Explanation	Halaman Page
5. Dewan pengawas syariah, bagi Emiten atau Perusahaan Publik yang menjalankan kegiatan usaha berdasarkan prinsip syariah sebagaimana tertuang dalam anggaran Dasar. Sharia supervisory board, for Issuers or Public Companies that carry out business activities based on sharia principles as stated in the articles of association.	a. Nama; b. Dasar hukum pengangkatan dewan pengawas syariah; c. Periode penugasan dewan pengawas syariah; d. Tugas dan tanggung jawab dewan pengawas syariah; dan e. Frekuensi dan cara pemberian nasihat dan saran serta pengawasan pemenuhan prinsip syariah di pasar modal terhadap emiten atau perusahaan publik. a. Name; b. The legal basis of appointment of the sharia supervisory board; c. The assignment period of the sharia supervisory board; d. The duties and responsibilities of the sharia supervisory board; and e. Frequency and method of providing advice and suggestions as well as supervising compliance with sharia principles in the capital market applicable to issuers or public companies.	N/A
6. Komite Audit. Audit Committee.	a. Nama dan jabatannya dalam keanggotaan komite; b. Usia; c. Kewarganegaraan; d. Riwayat pendidikan; e. Riwayat jabatan, meliputi informasi: 1) Dasar hukum penunjukan sebagai anggota komite; 2) Rangkap jabatan, baik sebagai anggota dewan komisaris, anggota direksi, dan/atau anggota komite serta jabatan lainnya (jika ada); dan 3) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; f. Periode dan masa jabatan anggota komite audit; g. Pernyataan independensi komite audit; h. Pelatihan dan/atau peningkatan kompetensi yang telah diikuti dalam tahun buku (jika ada); i. Kebijakan dan pelaksanaan frekuensi rapat komite audit dan tingkat kehadiran anggota komite audit dalam rapat tersebut; dan j. Pelaksanaan kegiatan komite audit pada tahun buku sesuai dengan yang dicantumkan dalam pedoman atau piagam (*charter*) komite audit. a. Name and position in committee; b. Age; c. Citizenship; d. Educational history; e. Position history, including information on: 1) Legal basis of appointment as committee member; 2) Concurrent positions, as members of the board of commissioners, members of the board of directors, and/or committee members and other positions (if any); and 3) Work experience and time period inside and outside the issuer or public company; f. Period and term of audit committee members; g. Audit committee independency statement; h. Training and/or competency development programs attended in the financial year (if any); i. Policy and frequency of audit committee's meetings and the attendance level of audit committee's members in these meetings; and j. Implementation of audit committee activities in the financial year according to what is stated in the audit committee guidelines or charter.	210
7. Komite atau fungsi nominasi dan remunerasi Emiten atau Perusahaan Publik. Nomination and remuneration committee or function of Issuer or Public Company.	a. Nama dan jabatannya dalam keanggotaan komite; b. Usia; c. Kewarganegaraan; d. Riwayat pendidikan; e. Riwayat jabatan, meliputi informasi: 1) Dasar hukum penunjukan sebagai anggota komite; 2) Rangkap jabatan, baik sebagai anggota dewan komisaris, anggota direksi, dan/atau anggota komite serta jabatan lainnya (jika ada); dan 3) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; f. Periode dan masa jabatan anggota komite; g. Pernyataan independensi komite; h. Pelatihan dan/atau peningkatan kompetensi yang telah diikuti dalam tahun buku (jika ada); i. Uraian tugas dan tanggung jawab; j. Pernyataan bahwa telah memiliki pedoman atau piagam (*charter*); k. Kebijakan dan pelaksanaan frekuensi rapat dan tingkat kehadiran anggota dalam rapat tersebut;	205

Kriteria Criteria	Penjelasan Explanation	Halaman Page
	l. Uraian singkat pelaksanaan kegiatan pada tahun buku; dan m. Dalam hal tidak dibentuk komite nominasi dan remunerasi, emiten atau perusahaan publik cukup mengungkapkan informasi sebagaimana dimaksud dalam huruf i) sampai dengan huruf l) dan mengungkapkan: 1) Alasan tidak dibentuknya komite; dan 2) Pihak yang melaksanakan fungsi nominasi dan remunerasi. a. Name and position in committee; b. Age; c. Citizenship; d. Educational history; e. Position history, including information on: 1) Legal basis of appointment as committee member; 2) Concurrent positions, as members of the board of commissioners, members of the board of directors, and/or committee members and other positions (if any); and 3) Work experience and time period inside and outside the issuer or public company; f. Period and term of committee members; g. Committee independency statement; h. Training and/or competency development programs attended in the financial year (if any); i. Description of duties and responsibilities; j. Statement that the committee already has a guideline or charter; k. Policy and frequency of meetings and the attendance level of members at the meetings; l. A brief description of the implementation of activities in the financial year; and m. In the event that a nomination and remuneration committee is not formed, it is sufficient for the issuer or public company to disclose the information referred to in letter i) to letter l) and disclose: 1) The reasons for not forming the committee; and 2) Party carrying out nomination and remuneration functions.	
8. Komite lain yang dimiliki Emiten atau Perusahaan Publik dalam rangka mendukung fungsi dan tugas Direksi (jika ada) dan/atau komite yang mendukung fungsi dan tugas Dewan Komisaris. Other committees established by Issuers or Public Companies in order to support the Board of Directors' functions and duties (if any) and/or committees that support the Board of Commissioners' functions and duties.	a. Nama dan jabatannya dalam keanggotaan komite; b. Usia; c. Kewarganegaraan; d. Riwayat pendidikan; e. Riwayat jabatan, meliputi informasi: 1) Dasar hukum penunjukan sebagai anggota komite; 2) Rangkap jabatan, baik sebagai anggota dewan komisaris, anggota direksi, dan/atau anggota komite serta jabatan lainnya (jika ada); dan 3) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; f. Periode dan masa jabatan anggota komite; g. Pernyataan independensi komite; h. Pelatihan dan/atau peningkatan kompetensi yang telah diikuti dalam tahun buku (jika ada); dan i. Uraian tugas dan tanggung jawab; j. Pernyataan bahwa telah memiliki pedoman atau piagam (*charter*) komite; k. Kebijakan dan pelaksanaan frekuensi rapat komite dan tingkat kehadiran anggota komite dalam rapat tersebut; dan l. Uraian singkat pelaksanaan kegiatan komite pada tahun buku. a. Name and position in committee; b. Age; c. Citizenship; d. Educational history; e. Position history, including information on: 1) Legal basis of appointment as committee member; 2) Concurrent positions, as members of the board of commissioners, members of the board of directors, and/or committee members and other positions (if any); and 3) Work experience and time period inside and outside the issuer or public company; f. Period and term of committee members; g. Committee independency statement; h. Training and/or competency development programs attended in the financial year (if any); and	199, 213, 214

Kriteria Criteria	Penjelasan Explanation	Halaman Page
	i. Description of duties and responsibilities; j. Statement that the committee already has a guideline or charter; k. Policy and frequency of committee's meetings and the attendance level of committee members at meetings; and l. A brief description of the implementation of committee's activities in the financial year.	
9. Sekretaris Perusahaan. Corporate Secretary.	a. Nama; b. Domisili; c. Riwayat jabatan, meliputi: 1) Dasar hukum penunjukan sebagai sekretaris perusahaan; dan 2) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; d. Riwayat pendidikan; e. Pelatihan dan/atau peningkatan kompetensi yang diikuti dalam tahun buku; dan f. Uraian singkat pelaksanaan tugas sekretaris perusahaan pada tahun buku. a. Name; b. Domicile; c. Position history, including: 1) Legal basis of appointment as corporate secretary; and 2) Work experience and time period inside and outside the issuer or public company; d. Educational history; e. Training and/or competency development programs attended in the financial year; and f. Brief description of the implementation of corporate secretary's duties in the financial year.	228
10. Unit Audit Internal. Internal Audit Unit.	a. Nama kepala unit audit internal; b. Riwayat jabatan, meliputi: 1) Dasar hukum penunjukan sebagai kepala unit audit internal; dan 2) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar emiten atau perusahaan publik; c. Kualifikasi atau sertifikasi sebagai profesi audit internal (jika ada); d. Pelatihan dan/atau peningkatan kompetensi yang diikuti dalam tahun buku; e. Struktur dan kedudukan unit audit internal; f. Uraian tugas dan tanggung jawab; g. Pernyataan bahwa telah memiliki pedoman atau piagam (*charter*) unit audit internal; dan h. Uraian singkat pelaksanaan tugas unit audit internal pada tahun buku termasuk kebijakan dan pelaksanaan frekuensi rapat dengan direksi, dewan komisaris, dan/atau komite audit. a. Name of the head of internal audit unit; b. Position history, including: 1) Legal basis of appointment as head of internal audit unit; and 2) Work experience and time period inside and outside the issuer or public company; c. Qualification or certification for internal audit profession (if any); d. Training and/or competency development programs attended in the financial year; e. The structure and position of the internal audit unit; f. Description of duties and responsibilities; g. Statement that the internal audit unit already has a guideline or charter; and h. A brief description of the implementation of internal audit unit's duties in the financial year including the policies and frequency of meetings with the board of directors, board of commissioners, and/or audit committee.	232

Kriteria Criteria	Penjelasan Explanation	Halaman Page
11. Uraian mengenai sistem pengendalian internal (*internal control*) yang diterapkan oleh Emiten atau Perusahaan Publik. Description of internal control system implemented by Issuers or Public Companies.	a. Pengendalian keuangan dan operasional, serta kepatuhan terhadap peraturan perundang-undangan lainnya; b. Tinjauan atas efektivitas sistem pengendalian internal; dan c. Pernyataan direksi dan/atau dewan komisaris atas kecukupan sistem pengendalian internal. a. Financial and operational control, as well as compliance with other laws and regulations; b. Review of the effectiveness of internal control system; and c. Statement of the board of directors and/or board of commissioners on the adequacy of the internal control system.	239
12. Sistem manajemen risiko yang diterapkan oleh Emiten atau Perusahaan Publik. Risk management system implemented by Issuers or Public Companies.	a. Gambaran umum mengenai sistem manajemen risiko Emiten atau Perusahaan Publik; b. Jenis risiko dan cara pengelolaannya; c. Tinjauan atas efektivitas sistem manajemen risiko Emiten atau Perusahaan Publik; dan d. Pernyataan Direksi dan/atau Dewan Komisaris atau komite audit atas kecukupan sistem manajemen risiko. a. General description of the Issuer's or Public Company's risk management system; b. Types of risks and how to manage them; c. Review of the effectiveness of the Issuer's or Public Company's risk management system; and d. Statement of the Board of Directors and/or Board of Commissioners or the audit committee on the adequacy of the risk management system.	337
13. Perkara hukum yang berdampak material yang dihadapi oleh Emiten atau Perusahaan Publik, entitas anak, anggota Direksi dan anggota Dewan Komisaris (jika ada). Legal cases with material impacts faced by Issuers or Public Companies, subsidiaries, members of the Board of Directors, and members of the Board of Commissioners (if any).	a. Pokok perkara/gugatan; b. Status penyelesaian perkara/gugatan; dan c. Pengaruhnya terhadap kondisi emiten atau perusahaan Publik. a. Case profile/lawsuit; b. The settlement status of the case/lawsuit; and c. The impact on the issuers or public companies' condition.	250
14. informasi tentang sanksi administratif/sanksi yang dikenakan kepada Emiten atau Perusahaan Publik, anggota Dewan Komisaris dan anggota Direksi, oleh Otoritas Jasa Keuangan dan otoritas lainnya pada tahun buku (jika ada). Information on administrative sanctions/sanctions imposed on Issuers or Public Companies, members of the Board of Commissioners. and members of the Board of Directors, by the Financial Services Authority and other authorities in the financial year (if any).		255
15. Informasi mengenai kode etik Emiten atau Perusahaan Publik. Information regarding the code of conduct of Issuers or Public Companies.	a. Pokok-pokok kode etik; b. Bentuk sosialisasi kode etik dan upaya penegakannya; dan c. Pernyataan bahwa kode etik berlaku bagi anggota direksi, anggota Dewan Komisaris, dan karyawan Emiten atau Perusahaan Publik. a. The principles of the code of conduct; b. The form of dissemination of the code of conduct and efforts to enforce it; and c. A statement that the code of conduct applies to members of the board of directors, members of the board of commissioners, and employees of Issuers or Public Companies.	260
16. Uraian singkat mengenai kebijakan pemberian kompensasi jangka panjang berbasis kinerja kepada manajemen dan/atau karyawan yang dimiliki oleh Emiten atau Perusahaan Publik (jika ada), antara lain berupa program kepemilikan saham oleh manajemen (*management stock ownership program*/MSOP) dan/atau program kepemilikan saham oleh karyawan (*employee stock ownership program*/ESOP). A brief description of the policy of providing performance-based long-term compensation to management and/or employees owned by Issuers or Public Companies (if any), including but not limited to management stock ownership program (MSOP) and/or employee stock ownership program (ESOP).	Dalam hal pemberian kompensasi berupa program kepemilikan saham oleh manajemen (*management stock ownership program*/MSOP) dan/atau program kepemilikan saham oleh karyawan (*employee stock ownership program*/ESOP), informasi yang diungkapkan paling sedikit memuat: a. Jumlah saham dan/atau opsi; b. Jangka waktu pelaksanaan; c. Persyaratan karyawan dan/atau manajemen yang berhak; dan d. Harga pelaksanaan atau penentuan harga pelaksanaan. In terms of providing compensation in the form of management stock ownership program (MSOP) and/or employee stock ownership program (ESOP), the information disclosed shall contain at least: a. Number of shares and/or options; b. Implementation period; c. Requirements for eligible employee and/or management; and d. Execution price or determination of execution price.	263

Kriteria Criteria	Penjelasan Explanation	Halaman Page
17. Uraian singkat mengenai kebijakan pengungkapan informasi. A brief description of the information disclosure policy.	a. Kepemilikan saham anggota Direksi dan anggota Dewan Komisaris paling lambat 3 (tiga) hari kerja setelah terjadinya kepemilikan atau setiap perubahan kepemilikan atas saham Perusahaan Terbuka; dan b. Pelaksanaan atas kebijakan dimaksud. a. Share ownership of members of the Board of Directors and members of the Board of Commissioners no later than 3 (three) working days after the ownership or any change in ownership of the Public Company's shares; and b. Implementation of the said policy.	263
18. Uraian mengenai sistem pelaporan pelanggaran (*whistleblowing system*) di Emiten atau Perusahaan Publik. Description of the violation reporting system (whistleblowing system) in Issuers or Public Companies.	a. Cara penyampaian laporan pelanggaran; b. Perlindungan bagi pelapor; c. Penanganan pengaduan; d. Pihak yang mengelola pengaduan; dan e. Hasil dari penanganan pengaduan, paling sedikit: 1) Jumlah pengaduan yang masuk dan diproses dalam tahun buku; dan 2) Tindak lanjut pengaduan. Dalam hal Emiten atau Perusahaan Publik tidak memiliki sistem pelaporan pelanggaran (*whistleblowing system*), maka diungkapkan mengenai hal tersebut. a. Method of submission of violation reports; b. Protection for reporters; c. How to handle the complaints; d. Parties who manage complaints; and e. The results of handling complaints, at least: 1) Number of complaints received and processed in the financial year; and 2) The complaint follow-up. In the event that the Issuer or Public Company does not have a violation reporting system (whistleblowing system), then this matter shall be disclosed.	266
19. Uraian mengenai kebijakan anti korupsi Emiten atau Perusahaan Publik. Description of the Issuer's or Public Company's anti-corruption policy.	a. Program dan prosedur yang dilakukan dalam mengatasi praktik korupsi, balas jasa (*kickbacks*), fraud, suap dan/atau gratifikasi dalam Emiten atau Perusahaan Publik; dan b. Pelatihan/sosialisasi anti korupsi kepada karyawan Emiten atau Perusahaan Publik. Dalam hal Emiten atau Perusahaan Publik tidak memiliki kebijakan anti korupsi, maka dijelaskan alasan tidak dimilikinya kebijakan dimaksud. a. Programs and procedures carried out in overcoming corrupt practices, remuneration (kickbacks), fraud, bribes, and/or gratuities in Issuers or Public Companies; and b. Anti-corruption training/dissemination for employees of Issuers or Public Companies. If the Issuer or Public Company does not have an anti-corruption policy, the reasons for not having such a policy shall be explained.	263
20. Penerapan atas pedoman tata kelola Perusahaan Terbuka bagi Emiten yang menerbitkan efek bersifat ekuitas atau Perusahaan Publik. Implementation of Public Company governance guidelines for Issuers that issue equity securities or Public Companies.	a. Pernyataan mengenai rekomendasi yang telah dilaksanakan; dan/atau b. Penjelasan atas rekomendasi yang belum dilaksanakan, disertai alasan dan alternatif pelaksanaannya (jika ada). Pengungkapan informasi dapat disajikan dalam bentuk tabel. a. Statement regarding recommendations that have been implemented; and/or b. Explanation of recommendations that have not been implemented, accompanied by reasons and alternatives for implementation (if any). Disclosure of information can be presented in tabular form.	270
Tanggung Jawab Sosial dan Lingkungan Emiten atau Perusahaan Publik / Social and Environmental Responsibility of Issuers or Public Companies		
1. Informasi yang diungkapkan dalam bagian tanggung jawab sosial dan lingkungan merupakan Laporan Keberlanjutan (*Sustainability Report*) sebagaimana dimaksud dalam Peraturan Otoritas Jasa Keuangan No. 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik.	a. Penjelasan strategi keberlanjutan; b. Ikhtisar aspek keberlanjutan (ekonomi, sosial, dan lingkungan hidup); c. Profil singkat emiten atau perusahaan publik; d. Penjelasan direksi; e. Tata kelola keberlanjutan; f. Kinerja keberlanjutan; g. Verifikasi tertulis dari pihak independen, jika ada; h. Lembar umpan balik (*feedback*) untuk pembaca, jika ada; dan i. Tanggapan emiten atau perusahaan publik terhadap umpan balik laporan tahun sebelumnya.	✓

Kriteria Criteria	Penjelasan Explanation	Halaman Page
The information disclosed in the social and environmental responsibility section is a Sustainability Report as referred to in the Financial Services Authority Regulation No. 51/POJK.03/2017 on Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies.	a. Explanation of sustainability strategy; b. An overview of sustainability aspects (economic, social, and environmental); c. Brief profile of the issuer or public company; d. Explanation from the board of directors; e. Sustainability governance; f. Sustainability performance; g. Written verification from an independent party, if any; h. Feedback form for readers, if any; and i. The issuer or public company's response to the previous year's report feedback.	
2. Laporan Keberlanjutan sebagaimana dimaksud pada angka 1), harus disusun sesuai Pedoman Teknis Penyusunan Laporan Keberlanjutan (*Sustainability Report*) Bagi Emiten dan Perusahaan Publik sebagaimana tercantum dalam Lampiran II yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini. The Sustainability Report as referred to in number 1), must be prepared in accordance with the Technical Guidelines for Preparing Sustainability Reports For Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular.		✓
3. informasi Laporan Keberlanjutan (*Sustainability Report*) pada angka 1) dapat: Sustainability Report information in number 1) can:	a. Diungkapkan pada bagian lain yang relevan di luar bagian tanggung jawab sosial dan lingkungan, seperti penjelasan Direksi terkait Laporan Keberlanjutan diungkapkan dalam bagian terkait Laporan Direksi; dan/atau b. Merujuk pada bagian lain di luar bagian tanggung jawab sosial dan lingkungan dengan tetap mengacu pada Pedoman Teknis Penyusunan Laporan Keberlanjutan (*Sustainability Report*) Bagi Emiten dan Perusahaan Publik sebagaimana tercantum dalam Lampiran II yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini, seperti profil Emiten atau Perusahaan Publik. a. Be disclosed in other relevant sections outside the social and environmental responsibility section, such as the Board of Directors' explanation regarding the Sustainability Report is disclosed in the related section of the Board of Directors' Report; and/or b. Refer to other sections outside the social and environmental responsibility section while still referring to the Technical Guidelines for Preparing Sustainability Report For Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular, such as the profile of the Issuer or Public Company.	✓
4. Laporan Keberlanjutan (*Sustainability Report*) sebagaimana dimaksud pada angka 1) merupakan bagian yang tidak terpisahkan dari Laporan Tahunan namun dapat disajikan secara terpisah dengan Laporan Tahunan. Sustainability Report as referred to in number 1) is an integral part of the Annual Report but can be presented separately from the Annual Report.		✓
5. Dalam hal Laporan Keberlanjutan disajikan secara terpisah dengan Laporan Tahunan, informasi yang diungkapkan dalam Laporan Keberlanjutan dimaksud harus: In the event that the Sustainability Report is presented separately from the Annual Report, the information disclosed in the Sustainability Report must:	a. Memuat seluruh informasi sebagaimana dimaksud pada angka 1); dan b. Disusun sesuai Pedoman Teknis Penyusunan Laporan Keberlanjutan (*Sustainability Report*) Bagi Emiten dan Perusahaan Publik sebagaimana tercantum dalam Lampiran II yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini. a. Contain all the information referred to in number 1); and b. Be prepared according to Technical Guidelines for Preparing Sustainability Report for Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular.	✓

Kriteria Criteria	Penjelasan Explanation	Halaman Page
6. Dalam hal Laporan Keberlanjutan disajikan secara terpisah dengan Laporan Tahunan, maka dalam bagian tanggung jawab sosial dan lingkungan memuat informasi bahwa informasi mengenai tanggung jawab sosial dan lingkungan telah diungkapkan dalam Laporan Keberlanjutan yang disajikan secara terpisah dari Laporan Tahunan. In the event that the Sustainability Report is presented separately from the Annual Report, then the social and environmental responsibility section contains information that information regarding social and environmental responsibility has been disclosed in the Sustainability Report which is presented separately from the Annual Report.		✓
7. Penyampaian Laporan Keberlanjutan (*Sustainability Report*) yang disajikan secara terpisah dengan Laporan Tahunan harus disampaikan bersamaan dengan penyampaian Laporan Tahunan. Submission of Sustainability Report presented separately from the Annual Report must be submitted together with the submission of the Annual Report.		✓
Laporan Keuangan Tahunan yang Telah Diaudit / Audited Annual Financial Statements		
Laporan keuangan tahunan yang dimuat dalam Laporan Tahunan disusun sesuai dengan standar akuntansi keuangan di Indonesia dan telah diaudit oleh akuntan publik yang terdaftar di Otoritas Jasa Keuangan. Laporan keuangan tahunan dimaksud memuat pernyataan mengenai pertanggungjawaban atas laporan keuangan sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan mengenai tanggung jawab Direksi atas laporan keuangan atau peraturan perundang-undangan di sektor pasar modal yang mengatur mengenai laporan berkala perusahaan efek dalam hal Emiten merupakan perusahaan efek. The annual financial statements included in the Annual Report are prepared in accordance with Indonesian financial accounting standards and have been audited by a public accountant registered with the Financial Services Authority. The annual financial statements contain a statement regarding accountability for financial statements as stipulated in the Financial Services Authority Regulation regarding the responsibility of the Board of Directors for financial statements or laws and regulations in the capital market sector which regulate periodic reports of securities companies in the event that the Issuer is a securities company.		✓
Surat Pernyataan Anggota Direksi dan Anggota Dewan Komisaris tentang Tanggung Jawab atas Laporan Tahunan / Statement of Members of the Board of Directors and Members of the Board of Commissioners regarding Responsibility for the Annual Report		
Surat pernyataan anggota Direksi dan anggota Dewan Komisaris tentang tanggung jawab atas Laporan Tahunan disusun sesuai dengan format Surat Pernyataan Anggota Direksi dan Anggota Dewan Komisaris tentang Tanggung Jawab atas Laporan Tahunan sebagaimana tercantum dalam Lampiran I yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini. Statements of members of the Board of Directors and members of the Board of Commissioners regarding responsibility for the Annual Report are prepared in accordance with the format of Statement Letters of Members of the Board of Directors and Board of Commissioners regarding Responsibility for Annual Reports as listed in Appendix I which is an integral part of this Financial Services Authority Circular.		✓

PT Bank Victoria International Tbk

Laporan keuangan tanggal 31 Desember 2023
dan untuk tahun yang berakhir pada tanggal tersebut
beserta laporan auditor independen/
Financial statements as of December 31, 2023
for the year then ended with independent auditor's report

The original financial statements included herein are in Indonesian language.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN KEUANGAN
TANGGAL 31 DESEMBER 2023
DAN UNTUK TAHUN YANG BERAKHIR PADA TANGGAL TERSEBUT
BESERTA LAPORAN AUDITOR INDEPENDEN

PT BANK VICTORIA INTERNATIONAL Tbk
FINANCIAL STATEMENTS
AS OF DECEMBER 31, 2023
AND FOR THE YEAR THEN ENDED
WITH INDEPENDENT AUDITOR'S REPORT

Daftar Isi / ***Table of Contents***

	Halaman/ *Page*	
Surat Pernyataan Direksi		*Statement Letter of the Board of Directors*
Laporan Auditor Independen		*Independent Auditor's Reports*
Laporan Posisi Keuangan	1-3	*Statement of Financial Position*
Laporan Laba Rugi dan Penghasilan Komprehensif Lain	4-5	*Statement of Profit or Loss and Other Comprehensive Income*
Laporan Perubahan Ekuitas	6-7	*Statement of Changes in Equity*
Laporan Arus Kas	8-9	*Statement of Cash Flows*
Catatan atas Laporan Keuangan	10-174	*Notes to the Financial Statements*

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bank victoria

SURAT PERNYATAAN DEWAN DIREKSI TENTANG TANGGUNG JAWAB ATAS LAPORAN KEUANGAN TANGGAL 31 DESEMBER 2023 DAN UNTUK PERIODE YANG BERAKHIR PADA TANGGAL TERSEBUT PT BANK VICTORIA INTERNATIONAL Tbk

BOARD OF DIRECTORS' STATEMENT REGARDING THE RESPONSIBILITY FOR THE FINANCIAL STATEMENTS AS OF DECEMBER 31, 2023 AND FOR THE YEAR THEN ENDED PT BANK VICTORIA INTERNATIONAL Tbk

Kami, yang bertanda tangan di bawah ini :

We, the undersigned below:

1.	Nama	:	Achmad Friscantono MBA	:	*Name*
	Alamat kantor	:	Graha BIP Lantai 10, Jalan Gatot Subroto Kav. 23, Jakarta Selatan 12930	:	*Office address*
	Alamat domisili atau sesuai KTP	:	Jl. Benda II No.7 RT 002/RW 004, Kel Pulo Kec.Kebayoran Baru Jakarta	:	*Domicile address or address according to ID*
	Nomor telepon	:	021-522 8888	:	*Telephone number*
	Jabatan	:	Direktur Utama	:	*Title*
2.	Nama	:	Debora Wahjutirto Tanoyo	:	*Name*
	Alamat kantor	:	Graha BIP Lantai 10, Jalan Gatot Subroto Kav. 23, Jakarta Selatan 12930	:	*Office address*
	Alamat domisili atau sesuai KTP	:	Permata Hijau Blok E/41 RT 011/004, Grogol Utara Kebayoran Lama	:	*Domicile address or address according to ID*
	Nomor telepon	:	021-522-8888	:	*Telephone number*
	Jabatan	:	Direktur	:	*Title*

menyatakan bahwa:

declare that:

1. Kami bertanggung jawab atas penyusunan dan penyajian laporan keuangan PT Bank Victoria International Tbk;

2. Laporan keuangan PT Bank Victoria International Tbk telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia;

3. a. Semua informasi dalam laporan keuangan PT Bank Victoria International Tbk telah dimuat secara lengkap dan benar; dan

   b. Laporan keuangan PT Bank Victoria International Tbk tidak mengandung informasi atau fakta material yang tidak benar, dan tidak menghilangkan informasi atau fakta material;

4. Kami bertanggung jawab atas sistem pengendalian internal dalam PT Bank Victoria International Tbk.

1. *We are responsible for the preparation and presentation of the financial statements of PT Bank Victoria International Tbk;*

2. *The financial statements of PT Bank Victoria International Tbk have been prepared and presented in accordance with Indonesian Financial Accounting Standards;*

3. a. *All information in the financial statements of PT Bank Victoria International Tbk have been fully disclosed in a complete and truthful manner; and*

   b. *The financial statements of PT Bank Victoria International Tbk do not contain any incorrect information or material fact, nor do they omit any information or material fact;*

4. *We are responsible for the internal control system of PT Bank Victoria International Tbk.*

Demikian pernyataan ini dibuat dengan sebenarnya.

This statement is made truthfully.

Jakarta, 27 Maret 2024/*Jakarta, March 27, 2024*
Atas nama dan mewakili Direksi/*For and on behalf of the Board of Directors of*
PT Bank Victoria International Tbk

METERAI TEMPEL 6665AKX817974980

ACHMAD FRISCANTONO MBA
Direktur Utama/*Vice President Director*

DEBORA WAHJUTIRTO TANOYO
Direktur/ *Director*

EY
Building a better working world

Purwantono, Sungkoro & Surja

Indonesia Stock Exchange Building
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Jl. Jend. Sudirman Kav. 52-53
Jakarta 12190, Indonesia

Tel : +62 21 5289 5000
Fax: +62 21 5289 4100
ey.com/id

The original report included herein is in the Indonesian language.

Laporan Auditor Independen

Laporan No. 00388/2.1032/AU.1/07/0242-3/1/III/2024

Pemegang Saham, Dewan Komisaris, dan Direksi
PT Bank Victoria International Tbk

Opini

Kami telah mengaudit laporan keuangan PT Victoria International Tbk ("Bank") terlampir, yang terdiri dari laporan posisi keuangan tanggal 31 Desember 2023, serta laporan laba rugi dan penghasilan komprehensif lain, laporan perubahan ekuitas, dan laporan arus kas untuk tahun yang berakhir pada tanggal tersebut, serta catatan atas laporan keuangan, termasuk informasi kebijakan akuntansi material.

Menurut opini kami, laporan keuangan terlampir menyajikan secara wajar, dalam semua hal yang material, posisi keuangan Bank tanggal 31 Desember 2023, serta kinerja keuangan dan arus kasnya untuk tahun yang berakhir pada tanggal tersebut, sesuai dengan Standar Akuntansi Keuangan di Indonesia.

Basis opini

Kami melaksanakan audit kami berdasarkan Standar Audit yang ditetapkan oleh Institut Akuntan Publik Indonesia ("IAPI"). Tanggung jawab kami menurut standar tersebut diuraikan lebih lanjut dalam paragraf Tanggung Jawab Auditor terhadap Audit atas Laporan Keuangan pada laporan kami. Kami independen terhadap Bank berdasarkan ketentuan etika yang relevan dalam audit kami atas laporan keuangan di Indonesia, dan kami telah memenuhi tanggung jawab etika lainnya berdasarkan ketentuan tersebut. Kami yakin bahwa bukti audit yang telah kami peroleh adalah cukup dan tepat untuk menyediakan suatu basis bagi opini kami.

Hal audit utama

Hal audit utama adalah hal-hal yang, menurut pertimbangan profesional kami, merupakan hal yang paling signifikan dalam audit kami atas laporan keuangan periode kini. Hal audit utama tersebut disampaikan dalam konteks audit kami atas laporan keuangan secara keseluruhan, dan dalam merumuskan opini kami atas laporan keuangan terkait, dan kami tidak menyatakan suatu opini terpisah atas hal audit utama tersebut. Untuk setiap hal audit utama di bawah ini, penjelasan kami tentang bagaimana audit kami merespons hal tersebut disampaikan dalam konteks tersebut.

Independent Auditor's Report

Report No. 00388/2.1032/AU.1/07/0242-3/1/III/2024

The Shareholders and the Boards of Commissioners and Directors
PT Bank Victoria International Tbk

Opinion

We have audited the accompanying financial statements of PT Bank Victoria International Tbk (the "Bank"), which comprise the statement of financial position as of December 31, 2023, and the statement of profit or loss and other comprehensive income, statement of changes in equity, and statement of cash flows for the year then ended, and notes to the financial statements, including material accounting policy information.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Bank as of December 31, 2023, and its financial performance and cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.

Basis for opinion

We conducted our audit in accordance with Standards on Auditing established by the Indonesian Institute of Certified Public Accountants ("IICPA"). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements paragraph of our report. We are independent of the Bank in accordance with the ethical requirements relevant to our audit of the financial statements in Indonesia, and we have fulfilled our other ethical responsibilities in accordance with such requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the financial statements of the current period. Such key audit matters were addressed in the context of our audit of the financial statements taken as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on such key audit matters. For each of the key audit matters below, our description of how our audit addressed such key audit matters is provided in such context.

Purwantono, Sungkoro & Surja
Registered Public Accountants MAK No. 603/KM.1/2015
A member firm of Ernst & Young Global Limited

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Laporan Auditor Independen (lanjutan)

Laporan No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (lanjutan)

Hal audit utama (lanjutan)

Kami telah memenuhi tanggung jawab yang diuraikan dalam paragraf Tanggung Jawab Auditor terhadap Audit atas Laporan Keuangan pada laporan kami, termasuk sehubungan dengan hal-hal audit utama yang dikomunikasikan di bawah ini. Oleh karena itu, audit kami mencakup pelaksanaan prosedur yang didesain untuk merespons penilaian kami atas risiko kesalahan penyajian material dalam laporan keuangan terlampir. Hasil prosedur audit kami, termasuk prosedur yang dilakukan untuk merespons hal-hal audit utama di bawah ini, menyediakan basis bagi opini kami atas laporan keuangan terlampir.

Cadangan kerugian penurunan nilai atas pinjaman yang diberikan

Penjelasan atas hal audit utama:

Pada tanggal 31 Desember 2023, nilai tercatat pinjaman yang diberikan adalah sebesar Rp18,6 triliun, sebelum cadangan penurunan nilai sebesar Rp574,9 miliar. Pengungkapan atas hal ini diuraikan pada Catatan 2, 3, 11, 32 dan 45 atas laporan keuangan terlampir.

Cadangan kerugian penurunan nilai atas pinjaman yang diberikan adalah hal audit utama bagi kami karena nilai tercatat pinjaman yang diberikan dan cadangan kerugian penurunan nilainya adalah signifikan terhadap laporan keuangan, dan perhitungan cadangan kerugian penurunan nilai tersebut memerlukan penerapan pertimbangan dan estimasi signifikan dari manajemen, yaitu penentuan model untuk menghitung cadangan tersebut, identifikasi eksposur kredit yang mengalami penurunan kualitas kredit yang signifikan, dan penentuan asumsi utama yang digunakan dalam model perhitungan cadangan kerugian penurunan nilai (untuk eksposur yang dinilai secara individu atau kolektif), termasuk faktor-faktor makroekonomi yang bersifat perkiraan masa depan (*forward-looking*).

Independent Auditor's Report (continued)

Report No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (continued)

Key audit matters (continued)

We have fulfilled the responsibilities described in the Auditor's Responsibilities for the Audit of the Financial Statements paragraph of our report, including in relation to the key audit matters communicated below. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatements of the accompanying financial statements. The results of our audit procedures, including the procedures performed to address the key audit matters below, provide the basis for our opinion on the accompanying financial statements.

Allowance for impairment losses of loans

Description of the key audit matter:

As of December 31, 2023, the balance of loans was amounted to Rp18.6 trillion, before allowance for impairment amounted to Rp574.9 billion. Disclosures of these matters are described in Notes 2, 3, 11, 32, and 45 to the accompanying financial statements.

Allowance for impairment losses of loans is a key audit matter to us because the carrying amounts of loans and the allowance for impairment losses were significant to the financial statements, and the calculation of allowance for impairment losses of loans required application of significant judgment and estimation from the management, such as establishing model to calculate the allowance for impairment, identification of credit exposures with significant deterioration in credit quality, and establishing key assumptions used in the model to calculate allowance for impairment losses (for exposures assessed on an individual or collective basis), which incorporated forward-looking macroeconomic factors.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (lanjutan)

Hal audit Utama (lanjutan)

Respons audit:

Kami mengevaluasi dan menguji rancangan dan efektivitas pengendalian utama atas proses pemberian pinjaman, penilaian kualitas pinjaman internal secara teratur, serta pencatatan dan pengawasan pinjaman yang diberikan. Kami memperoleh pemahaman tentang metodologi dan model keuangan untuk perhitungan cadangan kerugian penurunan nilai, serta melakukan validasi atas data masukan (*input*), dasar dan asumsi utama yang digunakan dalam menghitung cadangan kerugian penurunan nilai dengan membandingkan ke data historis Bank dan informasi pasar yang dapat diobservasi. Kami juga menguji tiga tahapan kualitas kredit portofolio sesuai dengan kriteria tingkatan (*staging*) yang ditetapkan oleh manajemen untuk pinjaman yang diberikan.

Kami juga menguji konsistensi antara pengalaman historis dan kondisi sekarang dengan kerugian terkini pada portofolio serta menilai kewajaran penyesuaian asumsi masa depan, analisis faktor ekonomi makro, dan beberapa skenario probabilitas tertimbang.

Untuk cadangan kerugian penurunan nilai yang ditentukan secara individual, atas dasar sampel kami mengevaluasi bila identifikasi dilakukan secara tepat waktu terhadap eksposur dengan penurunan kualitas kredit yang signifikan atau yang telah mengalami penurunan nilai. Untuk pinjaman yang diidentifikasi mengalami penurunan nilai, kami menilai asumsi utama atas arus kas masa depan yang akan diterima, termasuk nilai jaminan yang dapat direalisasikan berdasarkan informasi pasar yang tersedia atau penilaian yang dilakukan oleh pakar manajemen atau manajemen sendiri.

Kami memeriksa akurasi matematis perhitungan cadangan kerugian penurunan nilai atas dasar sampel dan menilai kecukupan pengungkapan atas hal-hal ini pada laporan keuangan terlampir. Kami melibatkan pakar auditor kami dalam melakukan prosedur-prosedur di atas sesuai dengan keahliannya.

Independent Auditor's Report (continued)

Report No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (continued)

Key audit matters (continued)

Audit response:

We evaluated and assessed the design and operating effectiveness of key controls over the process of loan origination, regular internal credit quality assessments, and recording and monitoring of the loans. We gained understanding over methodologies and financial model of the calculation of the impairment losses, and validated inputs, bases, and key assumptions used in calculating the allowance for impairment losses by comparing to the Bank's historical data and observable market data. We also tested the classification into the three-stage credit quality of loan portfolios in accordance with staging criteria established by the management regarding loans.

We also evaluated consistency of historic experience and the current circumstances with recent losses in the portfolios and assessed the reasonableness of forward-looking adjustments, macroeconomic factor analysis and probability-weighted multiple scenarios.

With respect to individually assessed impairment losses, on sample basis we evaluated if timely identification was made for exposures with significant deterioration in credit quality or exposures which have been impaired. For loans identified to be impaired, we assessed key assumptions on the expected futures cash flows, including the value of realizable collateral based on available market information or valuation prepared by the management's expert or the management.

We tested mathematical accuracy of the calculation of allowance for impairment losses on sample basis and we assessed the adequacy of disclosures for these matters in the notes to the accompanying financial statements. We involved our auditor's experts in the performance of these procedures in accordance with their specific expertise.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (lanjutan)

Hal audit Utama (lanjutan)

Cadangan kerugian penurunan nilai atas agunan yang diambil alih

Penjelasan atas hal audit utama:

Pada tanggal 31 Desember 2023, nilai tercatat dari agunan yang diambil alih ("AYDA"), terutama dalam bentuk tanah dan bangunan, adalah sebesar Rp802,5 miliar. AYDA dicatat sebesar nilai yang lebih rendah antara nilai tercatat dan nilai wajar dikurangi dengan biaya untuk menjual (*fair value of less cost to sell* atau "FVLCS"). Jika FVLCS lebih rendah dari nilai tercatatnya, maka cadangan kerugian penurunan nilai akan diakui.

Cadangan kerugian penurunan nilai atas AYDA adalah hal audit utama bagi kami karena nilai tercatatnya yang signifikan terhadap laporan keuangan dan pengukuran FVLCS memerlukan penerapan pertimbangan dan estimasi yang signifikan dari manajemen, terutama dalam menentukan metode penilaian dan asumsi utama yang digunakan dalam estimasi arus kas masa depan yang diharapkan, seperti tingkat diskonto, biaya untuk menjual dan realisasi penerimana arus kas.

Respons audit:

Kami mengevaluasi dan menguji rancangan dan efektivitas pengendalian utama atas proses perhitungan cadangan kerugian penurunan nilai AYDA. Kami juga memeroleh pemahaman atas proses pengakuan awal, pengukuran setelah pengakuan awal dan pengawasan atas AYDA.

Kami melakukan evaluasi terhadap metodologi, asumsi utama dan input data yang digunakan oleh pakar manajemen dalam menghitung FVLCS dari AYDA, dengan melakukan validasi atas FVLCS dari AYDA pada laporan penilaian dan estimasi realisasi penerimaan arus kas dan kewajaran tingkat diskonto yang digunakan dengan membandingkan dengan data internal Bank. Kami juga melakukan evaluasi atas kompentensi dan obyektivitas dari pakar manajemen dan kecukupan pengungkapan terkait pada catatan atas laporan keuangan terlampir.

Independent Auditor's Report (continued)

Report No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (continued)

Key audit matters (continued)

Allowance for impairment losses of foreclosed assets

Description of the key audit matter:

As of December 31, 2023, the carrying amount of foreclosed assets, mainly in the form of land and building, was amounting to Rp802.5 billion. The foreclosed assets are reconized at the lower of carrying value and the fair value of less cost to sell ("FVLCS"). When the FVLCS is lower than the carrying amount, allowance for impairment losses is recognized.

Allowance for impairment losses of foreclosed assets is a key audit matter to us because the carrying amount of the assets is significant to the financial statements and the measurement of FVLCS required application of significant judgement and estimation from the management, especially in establishing the valuation method and key assumptions used to estimate the expected future cash flows, such as discount rate, cost to sell and timing of the cash flows receipt.

Audit response:

We evaluated and assessed the design and operating effectiveness of the key controls over the process to calculate allowance for impairment losses of foreclosed assets. We gained understanding over the process of initial recognition, subsequent measurement and monitoring of the foreclosed assets.

We evaluated the methodology, key assumptions and data inputs used by the management's experts in calculating FVLCS of the foreclosed assets by validating the FVLCS of the foreclosed assets stated in the valuation report and estimation of timing for the cash flow receipt and reasonableness of discount rate used by comparing to internal data of the Bank. We evaluated the competence and objectivity of the management experts and adequacy of the related disclosures in the notes to the accompanying financial statements.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (lanjutan)

Informasi lain

Manajemen bertanggung jawab atas informasi lain. Informasi lain terdiri dari informasi yang tercantum dalam Laporan Tahunan 2023 ("Laporan Tahunan") selain laporan keuangan terlampir dan laporan auditor independen kami. Laporan Tahunan diharapkan akan tersedia bagi kami setelah tanggal laporan auditor independen ini.

Opini kami atas laporan keuangan terlampir tidak mencakup Laporan Tahunan, dan oleh karena itu, kami tidak menyatakan bentuk keyakinan apapun atas Laporan Tahunan tersebut.

Sehubungan dengan audit kami atas laporan keuangan terlampir, tanggung jawab kami adalah untuk membaca Laporan Tahunan ketika tersedia dan, dalam melaksanakannya, mempertimbangkan apakah Laporan Tahunan mengandung ketidakkonsistensian material dengan laporan keuangan terlampir atau pemahaman yang kami peroleh selama audit, atau mengandung kesalahan penyajian material.

Ketika kami membaca Laporan Tahunan, jika kami menyimpulkan bahwa terdapat suatu kesalahan penyajian material di dalamnya, kami diharuskan untuk mengomunikasikan hal tersebut kepada pihak yang bertanggung jawab atas tata kelola dan melakukan tindakan yang tepat berdasarkan peraturan perundang-undangan yang berlaku.

Tanggung jawab manajemen dan pihak yang bertanggung jawab atas tata kelola terhadap laporan keuangan

Manajemen bertanggung jawab atas penyusunan dan penyajian wajar laporan keuangan tersebut sesuai dengan Standar Akuntansi Keuangan di Indonesia, dan atas pengendalian internal yang dianggap perlu oleh manajemen untuk memungkinkan penyusunan laporan keuangan yang bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan.

Dalam penyusunan laporan keuangan, manajemen bertanggung jawab untuk menilai kemampuan Bank dalam mempertahankan kelangsungan usahanya, mengungkapkan, sesuai dengan kondisinya, hal-hal yang berkaitan dengan kelangsungan usaha, dan menggunakan basis akuntansi kelangsungan usaha, kecuali manajemen memiliki intensi untuk melikuidasi Bank atau menghentikan operasi, atau tidak memiliki alternatif yang realistis selain melaksanakannya.

Independent Auditor's Report (continued)

Report No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (continued)

Other information

Management is responsible for the other information. Other information comprises the information included in the 2023 Annual Report ("The Annual Report") other than the accompanying financial statements and our independent auditor's report thereon. The Annual Report is expected to be made available to us after the date of this independent auditor's report.

Our opinion on the accompanying financial statements does not cover the Annual Report, and accordingly, we do not express any form of assurance on the Annual Report.

In connection with our audit of the accompanying financial statements, our responsibility is to read the Annual Report when it becomes available and, in doing so, consider whether the Annual Report is materially inconsistent with the accompanying financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

When we read the Annual Report, if we conclude that there is a material misstatement therein, we are required to communicate the matter to those charged with governance and take appropriate actions based on the applicable laws and regulations.

Responsibilities of management and those charged with governance for the financial statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with Indonesian Financial Accounting Standards, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Bank's ability to continue as a going concern, disclosing, as applicable, matters related to going concern, and using the going concern basis of accounting, unless management either intends to liquidate the Bank or to cease its operations, or has no realistic alternative but to do so.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (lanjutan)

Tanggung jawab manajemen dan pihak yang bertanggung jawab atas tata kelola terhadap laporan keuangan (lanjutan)

Pihak yang bertanggung jawab atas tata kelola bertanggung jawab untuk mengawasi proses pelaporan keuangan Bank.

Tanggung jawab auditor terhadap audit atas laporan keuangan

Tujuan kami adalah untuk memeroleh keyakinan memadai tentang apakah laporan keuangan secara keseluruhan bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan, dan untuk menerbitkan laporan auditor independen yang mencakup opini kami. Keyakinan memadai merupakan suatu tingkat keyakinan tinggi, namun bukan merupakan suatu jaminan bahwa audit yang dilaksanakan berdasarkan Standar Audit yang ditetapkan oleh IAPI akan selalu mendeteksi kesalahan penyajian material ketika hal tersebut ada. Kesalahan penyajian dapat disebabkan oleh kecurangan maupun kesalahan dan dianggap material jika, baik secara individual maupun agregat, dapat diekspektasikan secara wajar akan memengaruhi keputusan ekonomi yang diambil oleh pengguna berdasarkan laporan keuangan tersebut.

Sebagai bagian dari suatu audit berdasarkan Standar Audit yang ditetapkan oleh IAPI, kami menerapkan pertimbangan profesional dan mempertahankan skeptisisme profesional selama audit. Kami juga:

- Mengidentifikasi dan menilai risiko kesalahan penyajian material dalam laporan keuangan, baik yang disebabkan oleh kecurangan maupun kesalahan, mendesain dan melaksanakan prosedur audit yang responsif terhadap risiko tersebut, serta memeroleh bukti audit yang cukup dan tepat untuk menyediakan basis bagi opini kami. Risiko tidak terdeteksinya suatu kesalahan penyajian material yang disebabkan oleh kecurangan lebih tinggi dari yang disebabkan oleh kesalahan, karena kecurangan dapat melibatkan kolusi, pemalsuan, penghilangan secara sengaja, pernyataan salah, atau pengabaian atas pengendalian internal.

Independent Auditor's Report (continued)

Report No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (continued)

Responsibilities of management and those charged with governance for the financial statements (continued)

Those charged with governance are responsible for overseeing the Bank's financial reporting process.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements taken as a whole are free from material misstatement, whether due to fraud or error, and to issue an independent auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Standards on Auditing established by the IICPA will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with Standards on Auditing established by the IICPA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- *Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to such risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or override of internal control.*

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Laporan Auditor Independen (lanjutan)

Laporan No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (lanjutan)

Tanggung jawab auditor terhadap audit atas laporan keuangan (lanjutan)

Sebagai bagian dari suatu audit berdasarkan Standar Audit yang ditetapkan oleh IAPI, kami menerapkan pertimbangan profesional dan mempertahankan skeptisisme profesional selama audit. Kami juga: (lanjutan)

- Memeroleh suatu pemahaman tentang pengendalian internal yang relevan dengan audit untuk mendesain prosedur audit yang tepat sesuai dengan kondisinya, tetapi bukan untuk tujuan menyatakan opini atas keefektivitasan pengendalian internal Bank.
- Mengevaluasi ketepatan kebijakan akuntansi yang digunakan serta kewajaran estimasi akuntansi dan pengungkapan terkait yang dibuat oleh manajemen.
- Menyimpulkan ketepatan penggunaan basis akuntansi kelangsungan usaha oleh manajemen dan, berdasarkan bukti audit yang diperoleh, apakah terdapat suatu ketidakpastian material yang terkait dengan peristiwa atau kondisi yang dapat menyebabkan keraguan signifikan atas kemampuan Bank untuk mempertahankan kelangsungan usahanya. Ketika kami menyimpulkan bahwa terdapat suatu ketidakpastian material, kami diharuskan untuk menarik perhatian dalam laporan auditor independen kami ke pengungkapan terkait dalam laporan keuangan atau, jika pengungkapan tersebut tidak memadai, memodifikasi opini kami. Kesimpulan kami didasarkan pada bukti audit yang diperoleh hingga tanggal laporan auditor independen kami. Namun, peristiwa atau kondisi masa depan dapat menyebabkan tidak dapat mempertahankan kelangsungan usaha.
- Mengevaluasi penyajian, struktur, dan isi laporan keuangan secara keseluruhan, termasuk pengungkapannya, dan apakah laporan keuangan mencerminkan transaksi dan peristiwa yang mendasarinya dengan suatu cara yang mencapai penyajian wajar.

Kami mengomunikasikan kepada pihak yang bertanggung jawab atas tata kelola mengenai, antara lain, ruang lingkup dan saat yang direncanakan atas audit serta temuan audit signifikan, termasuk setiap defisiensi signifikan dalam pengendalian internal yang teridentifikasi oleh kami selama audit.

Independent Auditor's Report (continued)

Report No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (continued)

Auditor's responsibilities for the audit of the financial statements (continued)

As part of an audit in accordance with Standards on Auditing established by the IICPA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also: (continued)

- *Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control.*
- *Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.*
- *Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our independent auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusion is based on the audit evidence obtained up to the date of our independent auditor's report. However, future events or conditions may cause the Bank to cease to continue as a going concern.*
- *Evaluate the overall presentation, structure, and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.*

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (lanjutan)

Tanggung jawab auditor terhadap audit atas laporan keuangan (lanjutan)

Kami juga memberikan suatu pernyataan kepada pihak yang bertanggung jawab atas tata kelola bahwa kami telah mematuhi ketentuan etika yang relevan mengenai independensi, dan mengomunikasikan kepada pihak tersebut seluruh hubungan, serta hal-hal lain yang dianggap secara wajar berpengaruh terhadap independensi kami, dan, jika relevan, pengamanan terkait.

Dari hal-hal yang dikomunikasikan kepada pihak yang bertanggung jawab atas tata kelola, kami menentukan hal-hal tersebut yang paling signifikan dalam audit atas laporan keuangan periode kini dan oleh karenanya menjadi hal audit utama. Kami menguraikan hal audit utama tersebut dalam laporan auditor independen kami kecuali peraturan perundang-undangan melarang pengungkapan publik tentang hal audit utama tersebut atau ketika, dalam kondisi yang sangat jarang terjadi, kami menentukan bahwa suatu hal audit utama tidak boleh dikomunikasikan dalam laporan auditor independen kami karena konsekuensi yang merugikan dari mengomunikasikan hal tersebut akan diekspektasikan secara wajar melebihi manfaat kepentingan publik atas komunikasi tersebut.

Independent Auditor's Report (continued)

Report No. 00388/2.1032/AU.1/07/0242-3/1/III/2024 (continued)

Auditor's responsibilities for the audit of the financial statements (continued)

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe such key audit matters in our independent auditor's report unless laws or regulations preclude public disclosure about such key audit matters or when, in extremely rare circumstances, we determine that a key audit matter should not be communicated in our independent auditor's report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

KAP Purwantono, Sungkoro & Surja

Yovita

Registrasi Akuntan Publik No.: AP.0242/*Public Accountant Registration No.: AP.0242*

27 Maret 2024/*March 27, 2024*

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN POSISI KEUANGAN
Tanggal 31 Desember 2023
(Dinyatakan dalam Ribuan Rupiah, Kecuali Dinyatakan Lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF FINANCIAL POSITION
As of December 31, 2023
(Expressed in Thousands of Rupiah, Unless Otherwise Stated)

	31 Desember 2023/ ***December 31, 2023***	**Catatan/** ***Notes***	**31 Desember 2022/** ***December 31, 2022*)***	
ASET				***ASSETS***
Kas	92.820.864	2d,2i,4	51.897.124	*Cash*
Giro pada Bank Indonesia	1.493.076.850	2d,2j,5	1.506.565.848	*Current accounts with Bank Indonesia*
Giro pada bank lain	296.298.919	2d,2j,	228.384.427	*Current accounts with other banks*
Dikurangi: Cadangan kerugian penurunan nilai	(1.726)	2g,6	-	*Less: Allowance for impairment losses*
	296.297.193		228.384.427	
Penempatan pada Bank Indonesia dan bank lain	916.367.530	2d,2g,	858.340.530	*Placements with Bank Indonesia and other banks*
Dikurangi: Cadangan kerugian penurunan nilai	(998.782)	2k,7	(13.015)	*Less: Allowance for impairment losses*
	915.368.748		858.327.515	
Efek-efek	6.285.563.736	2d,2g,	4.818.553.397	*Marketable securities*
Dikurangi: Cadangan kerugian penurunan nilai	(8.271.969)	2l,8	(8.862.949)	*Less: Allowance for impairment losses*
	6.277.291.767		4.809.690.448	
Efek-efek yang dibeli dengan janji dijual kembali	636.732.554	2d,2n,9	839.432.375	*Securities purchased under resale agreement*
Pendapatan bunga dan syariah yang masih akan diterima	386.167.151	2d,2g,10	416.231.152	*Interest and sharia income receivables*
Dikurangi: Cadangan kerugian penurunan nilai	(17.759.228)		(24.551.373)	*Less: Allowance for impairment losses*
	368.407.923		391.679.779	
Pinjaman yang diberikan, pembiayaan dan piutang syariah		2d,2g		*Loans, sharia financing and receivables*
Pihak berelasi	143.896.441	2m,11	73.265.683	*Related parties*
Pihak ketiga	18.484.846.736		15.751.345.408	*Third parties*
	18.628.743.177		15.824.611.091	
Dikurangi: Cadangan kerugian penurunan nilai	(574.872.202)		(538.118.251)	*Less: Allowance for impairment losses*
	18.053.870.975		15.286.492.840	
Tagihan akseptasi	12.474.839	2o	7.754.446	*Acceptence receivables*
Penyertaan saham	215.930.505	2p,12	242.104.323	*Investments in shares*
Biaya dibayar dimuka	25.465.024	2t,13	19.714.677	*Prepaid expenses*
Aset tetap dan aset hak guna	505.086.595	2q,14	544.733.377	*Fixed assets and right-of-use assets*
Dikurangi: Akumulasi penyusutan	(81.859.391)		(73.880.350)	*Less: Accumulated depreciation*
	423.227.204		470.853.027	
Agunan yang diambil alih	802.486.682	2g,2s,15	1.237.844.890	*Foreclosed assets*
Dikurangi: Cadangan kerugian penurunan nilai	(251.870.489)		(306.834.651)	*Less: Allowance for impairment losses*
	550.616.193		931.010.239	

*) Konsolidasian sampai dengan divestasi entitas anak pada tanggal 22 Desember 2022 (Lihat Catatan 48)

**) Consolidation until the date of divestment of subsidiary on December 22, 2022 (See Note 48)*

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2023
(Dinyatakan dalam Ribuan Rupiah, Kecuali Dinyatakan Lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2023
(Expressed in Thousands of Rupiah, Unless Otherwise Stated)

	31 Desember 2023/ *December 31, 2023*	**Catatan/ *Notes***	**31 Desember 2022/ *December 31, 2022*)***	
ASET (lanjutan)				***ASSETS (continued)***
Aset tak berwujud - bersih	8.192.813	2r,16	2.531.184	*Intangible assets - net*
Aset pajak tangguhan - bersih	163.003.926	2ab,22c	197.607.333	*Deferred tax assets - net*
Aset lain-lain	103.819.813	2t,17	102.279.016	*Other assets*
Dikurangi: Cadangan kerugian penurunan nilai	(12.356.770)		(14.323.476)	*Less: Allowance for impairment losses*
	91.463.043		87.955.540	
JUMLAH ASET	**29.624.240.421**		**25.932.001.125**	***TOTAL ASSETS***
LIABILITAS DAN EKUITAS				***LIABILITIES AND EQUITY***
LIABILITAS				***LIABILITIES***
Simpanan nasabah		2d,2u,18		*Deposit from customers*
- Pihak berelasi	1.397.970.027		387.327.309	*Related parties -*
- Pihak ketiga	21.031.210.465		18.984.510.328	*Third parties -*
	22.429.180.492		19.371.837.637	
Simpanan dari bank lain		2d,2u,19		*Deposits from other banks*
- Pihak berelasi	478.732		167.870	*Related parties -*
- Pihak ketiga	1.104.324.627		1.334.784.750	*Third parties -*
	1.104.803.359		1.334.952.620	
Efek-efek yang dijual dengan janji dibeli kembali	643.266.730	2d,2n,20	240.865.160	*Securities sold under repurchase agreement*
Efek-efek yang diterbitkan	1.347.639.528	2v,21	1.051.903.552	*Securities issued*
Utang Akseptasi	11.959.811	2o	-	*Acceptance payables*
Utang pajak		2ab,22a		*Taxes payable*
- Pajak penghasilan badan	-		16.049.378	*Corporate income tax -*
- Pajak lainnya	29.310.442		14.792.095	*Other taxes -*
	29.310.442		30.841.473	
Liabilitas imbalan kerja karyawan	39.837.511	2ac,24b	40.196.622	*Employee benefits obligation*
Akrual dan liabilitas lain-lain	193.457.538	2d,23	160.940.580	*Accruals and other liabilities*
JUMLAH LIABILITAS	**25.799.455.411**		**22.231.537.644**	***TOTAL LIABILITIES***

*) Konsolidasian sampai dengan divestasi entitas anak pada tanggal 22 Desember 2022 (Lihat Catatan 48)

*Consolidation until the date of divestment of subsidiary on December 22, 2022 (See Note 48) *)*

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2023
(Dinyatakan dalam Ribuan Rupiah, Kecuali Dinyatakan Lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2023
(Expressed in Thousands of Rupiah, Unless Otherwise Stated)

	31 Desember 2023/ ***December 31, 2023***	**Catatan/** ***Notes***	**31 Desember 2022/** ***December 31, 2022*)***	
LIABILITAS DAN EKUITAS (lanjutan)				***LIABILITIES AND EQUITY (continued)***
EKUITAS				***EQUITY***
Ekuitas yang dapat diatribusikan kepada pemilik entitas induk				*Equity attributable to equity holders of the parent entity*
Modal saham - nilai nominal Rp100 (nilai penuh) per saham Modal dasar - 41.000.000.000 lembar saham pada 31 Desember 2023 dan 2022				*Share capital - par value Rp100 (full amount) per share Authorised capital – 41,000,000,000 shares as of December 31, 2023, and 2022*
Modal ditempatkan dan disetor penuh - 15.848.235.778 dan 15.848.234.714 masing-masing saham pada tanggal 31 Desember 2023 dan 2022	1.584.823.578	25	1.584.823.471	*Issued and fully paid capital -15,848,235,778 and 15,848,234,714 shares as of December 31, 2023 and 2022, respectively*
Tambahan modal disetor	668.684.728	26	670.584.856	*Additional paid-in capital*
Kerugian yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	(16.832.287)	2d,2l	(38.589.677)	*Unrealised loss on changes in fair value of marketable securities measured at fair value through other comprehensive income, net of tax*
Surplus revaluasi aset tetap, setelah pajak	382.456.152	14	382.456.152	*Gain on revaluation of fixed assets, net of tax*
Pengukuran kembali atas liabilitas imbalan kerja, setelah pajak	19.466.902		16.819.083	*Remeasurements on employee benefit liabilities, net of tax*
Saldo laba:				*Retained earnings:*
- Telah ditentukan penggunaannya	202.200.000	27	177.200.000	*Appropriated*
- Belum ditentukan penggunaannya	983.985.937		907.169.596	*Unappropriated*
JUMLAH EKUITAS	**3.824.785.010**		**3.700.463.481**	***TOTAL EQUITY***
JUMLAH LIABILITAS DAN EKUITAS	**29.624.240.421**		**25.932.001.125**	***TOTAL LIABILITIES AND EQUITY***

*) Konsolidasian sampai dengan divestasi entitas anak pada tanggal 22 Desember 2022 (Lihat Catatan 48)

**) Consolidation until the date of divestment of subsidiary on December 22, 2022 (See Note 48)*

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN
Untuk Tahun Yang Berakhir
Pada Tanggal 31 Desember 2023
(Dinyatakan dalam Ribuan Rupiah, Kecuali Dinyatakan Lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME
For the Year Ended December 31, 2023
(Expressed in Thousands of Rupiah, Unless Otherwise Stated)

	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31,*			
	2023	**Catatan/ *Notes***	**2022*)**	
PENDAPATAN DAN BEBAN OPERASIONAL				***OPERATING INCOME AND EXPENSES***
Pendapatan bunga dan syariah				*Interest and sharia income*
Pendapatan bunga	1.836.391.130	2y, 29	1.635.522.726	*Interest income*
Pendapatan syariah	-	2y, 29	69.495.685	*Sharia income*
	1.836.391.130		1.705.018.411	
Beban bunga dan syariah	(1.257.661.775)	2y, 30	(971.637.742)	*Interest and sharia expense*
Pendapatan bunga dan syariah - bersih	578.729.355		733.380.669	*Interest and sharia income - net*
Pendapatan operasional lainnya				***Other operating income***
Pendapatan dari investasi reksadana	13.292.046		5.133.142	*Income from investment in mutual funds*
Keuntungan atas penjualan efek-efek yang diukur pada nilai wajar melalui laba rugi dan penghasilan komprehensif lain - bersih	35.431.712	2d	19.273.193	*Gains on sale of securities measured at fair value through profit or loss and other comprehensive income - net*
Provisi dan komisi selain dari pinjaman	15.679.319	2z	7.143.802	*Fees and commissions from transactions other than loans*
Lain-lain - bersih	188.962.184	31	348.653.086	*Others - net*
Jumlah pendapatan operasional lainnya	253.365.261		380.203.223	*Total other operating income*
Beban operasional lainnya				***Other operating expenses***
Beban penyisihan kerugian penurunan nilai aset keuangan	(242.509.120)	2g,32	(223.959.331)	*Provision for impairment losses on financial assets*
Pembalikan (beban) penyisihan kerugian penurunan nilai aset non-keuangan	54.964.162	2h,32	(47.616.890)	*Reversal (provision) for impairment losses on non-financial assets*
Kerugian atas perubahan nilai wajar penyertaan saham yang diukur pada nilai wajar melalui laba rugi	(31.877.279)	2d, 12	(2.980.457)	*Loss on changes in fair value of investment in shares measured at fair value through profit or loss*
Keuntungan/(kerugian) yang belum terealisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui laba rugi - bersih	3.930.662	2d	(1.263.942)	*Unrealised profit/(loss) on changes in fair value of securities measured at fair value through profit or loss - net*
Beban umum dan administrasi	(158.899.846)	2aa,33	(148.563.568)	*General and administrative expenses*
Beban tenaga kerja	(157.155.510)	2aa,34	(163.030.989)	*Personnel expenses*
Lain-lain	(126.476.550)	35	(112.102.276)	*Others*
Jumlah beban operasional lainnya	**(658.023.481)**		**(699.517.453)**	***Total other operating expenses***
LABA OPERASIONAL	**174.071.135**		**414.066.439**	***PROFIT FROM OPERATIONS***
Beban Non-Operasional - Bersih	(44.534.907)	36	(57.135.612)	*Non-Operating Expenses - Net*
LABA SEBELUM BEBAN PAJAK PENGHASILAN	**129.536.228**		**356.930.827**	***PROFIT BEFORE INCOME TAX EXPENSE***
BEBAN PAJAK PENGHASILAN - BERSIH	**(27.719.887)**	2ab,22b	**(130.757.374)**	***INCOME TAX BENEFIT - NET***
LABA BERSIH TAHUN BERJALAN	**101.816.341**		**226.173.453**	***NET PROFIT FOR THE YEAR***

*) Konsolidasian sampai dengan divestasi entitas anak pada tanggal 22 Desember 2022 (Lihat Catatan 48)

*Consolidation until the date of divestment of subsidiary on December 22, 2022 (See Note 48) *)*

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN (lanjutan)
Untuk Tahun Yang Berakhir
Pada Tanggal 31 Desember 2023
(Dinyatakan dalam Ribuan Rupiah, Kecuali Dinyatakan Lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME (continued)
For the Year Ended December 31, 2023
(Expressed in Thousands of Rupiah, Unless Otherwise Stated)

	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31,*			
	2023	**Catatan** ***Notes***	**2022*)**	
PENGHASILAN KOMPREHENSIF LAIN				***OTHER COMPREHENSIVE INCOME***
Pos-pos yang akan direklasifikasi ke laba rugi				***Items that would be reclassified to profit or loss***
Perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	27.894.092	2d,2l	(84.273.995)	*Changes in fair value of marketable securities measured at fair value through other comprehensive income*
Pajak tangguhan terkait	(6.136.700)	22c	15.958.836	*Related deferred income tax*
	21.757.392		(68.315.159)	
Pos yang tidak akan direklasifikasi ke laba rugi				***Items that would never be reclassified to profit or loss***
Pengukuran kembali atas liabilitas imbalan kerja	3.394.639	24	(2.230.737)	*Remeasurements on employee benefit liabilities*
Pajak tangguhan terkait	(746.821)	22c	307.249	*Related deferred income tax*
	2.647.818		(1.923.488)	
PENGHASILAN (RUGI) KOMPREHENSIF LAIN, SETELAH PAJAK PENGHASILAN	**24.405.210**		**(70.238.647)**	***OTHER COMPREHENSIVE INCOME (LOSS), NET OF INCOME TAX***
JUMLAH PENGHASILAN KOMPREHENSIF	**126.221.551**		**155.934.806**	***TOTAL COMPREHENSIVE INCOME***
Laba bersih yang dapat diatribusikan kepada:				*Net income attributable to:*
Pemilik entitas induk	101.816.341		226.173.453	*Equity holders of the parent entity*
Kepentingan nonpengendali	-	2c,42	-	*Non-controlling interest*
	101.816.341		226.173.453	
Penghasilan komprehensif yang dapat diatribusikan kepada:				*Comprehensive imcome attributable to:*
Pemilik entitas induk	126.221.551		155.934.806	*Equity holders of the parent entity*
Kepentingan nonpengendali	-	2c,42	-	*Non-controlling interest*
	126.221.551		155.934.806	
LABA BERSIH PER SAHAM YANG DAPAT DIATRIBUSIKAN KEPADA PEMILIK ENTITAS INDUK				***INCOME PER SHARE ATTRIBUTABLE TO ENTITY HOLDERS OF THE PARENT ENTITY***
Dasar (Rupiah penuh)	6,42	2ad,37	19,17	*Basic (full Rupiah)*
Dilusian (Rupiah penuh)	6,42	2ad,37	19,17	*Diluted (full Rupiah)*

*) Konsolidasian sampai dengan divestasi entitas anak pada tanggal 22 Desember 2022 (Lihat Catatan 48)

*Consolidation until the date of divestment of subsidiary on December 22, 2022 (See Note 48) *)*

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

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PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN PERUBAHAN EKUITAS
Untuk Tahun yang Berakhir pada
Tanggal 31 Desember 2023
(Disajikan dalam Ribuan Rupiah, Kecuali Dinyatakan Lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF CHANGES IN EQUITY
For the Year Ended
December 31, 2023
(Expressed in Thousands of Rupiah, Unless Otherwise Stated)

	Catatan/ *Notes*	Modal ditempatkan dan disetor penuh/ *Issued and fully paid capital*	Tambahan modal disetor/ *Additional paid-in capital*	Setoran modal diterima dimuka/*Capital received in advance*	Keuntungan (kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak tangguhan/ *Unrealised gains (loss) on changes in fair value of marketable securities measured at fair value through other comprehensive income - net of tax*	Surplus revaluasi aset tetap - setelah pajak/ *Gain on revaluation of fixed assets - net of tax*	Pengukuran kembali atas liabilitas imbalan kerja - setelah pajak/ *Remeasurements on employee benefit liabilities - net of tax*	Saldo laba/ *Retained earnings*		Jumlah/ *Total*	Kepentingan non pengendali/ *Non-controlling interest*	Jumlah ekuitas/ *Total equity*	
								Telah ditentukan penggunaannya/ *Appropriated*	Belum ditentukan penggunaannya/ *Unappropriated*				
Saldo per 1 Januari 2023		**1.584.823.471**	**670.584.856**	**-**	**(38.589.677)**	**382.456.152**	**16.819.083**	**177.200.000**	**907.169.596**	**3.700.463.481**	**-**	**3.700.463.481**	***Balance as of January 1, 2023***
Dana setoran modal	25	107	-	-	-	-	-	-	-	107	-	107	*Capital deposit fund*
Biaya emisi efek		-	(1.900.128)	-	-	-	-	-	-	(1.900.128)	-	(1.900.128)	*Issuance cost*
Penghasilan komprehensif lain:													*Other comprehensive income:*
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak		-	-	-	21.757.390	-	-	-	-	21.757.390	-	21.757.390	*Financial assets measured at fair value through other comprehensive income, net of tax*
Pengukuran kembali atas liabilitas imbalan kerja, setelah pajak	24	-	-	-	-	-	2.647.819	-	-	2.647.819	-	2.647.819	*Remeasurements on employee benefit liabilities, net of tax*
Pembentukan cadangan umum	28	-	-	-	-	-	-	25.000.000	(25.000.000)	-	-		*- Appropriation for general reserve*
Laba bersih tahun berjalan		-	-	-	-	-	-	-	101.816.341	101.816.341	-	101.816.341	*Net income for the year*
Saldo per 31 Desember 2023		**1.584.823.578**	**668.684.728**	**-**	**(16.832.287)**	**382.456.152**	**19.466.902**	**202.200.000**	**983.985.937**	**3.824.785.010**	**-**	**3.824.785.010**	***Balance as of December 31, 2023***

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN PERUBAHAN EKUITAS (lanjutan)
Untuk Tahun yang Berakhir pada
Tanggal 31 Desember 2023
(Disajikan dalam Ribuan Rupiah, Kecuali Dinyatakan Lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF CHANGES IN EQUITY (continued)
For the Year Ended
December 31, 2023
(Expressed in Thousands of Rupiah, Unless Otherwise Stated)

	Catatan/ *Notes*	Modal ditempatkan dan disetor penuh/ *Issued and fully paid capital*	Tambahan modal disetor/ *Additional paid-in capital*	Setoran modal diterima dimuka/*Capital received in advance*	Keuntungan (kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak tangguhan/ *Unrealised gains (loss) on changes in fair value of marketable securities measured at fair value through other comprehensive income - net of tax*	Surplus revaluasi aset tetap - setelah pajak/ *Gain on revaluation of fixed assets - net of tax*	Pengukuran kembali atas liabilitas imbalan kerja - setelah pajak/ *Remeasurements on employee benefit liabilities - net of tax*	Saldo laba/ *Retained earnings*		Jumlah/ *Total*	Kepentingan non pengendali/ *Non-controlling interest*	Jumlah ekuitas/ *Total equity*	
								Telah ditentukan penggunaannya/ *Appropriated*	Belum ditentukan penggunaannya/ *Unappropriated*				
Saldo per 1 Januari 2022		**1.048.713.257**	**407.785.927**	**278.000.000**	**18.283.309**	**382.456.152**	**20.973.059**	**186.356.165**	**671.839.978**	**3.014.407.847**	**17.327**	**3.014.425.174**	***Balance as of January 1, 2022***
Dana setoran modal	25,26	536.110.214	268.055.108	(278.000.000)	-	-	-	-	-	526.165.322	-	526.165.322	*Capital deposit fund*
Biaya emisi efek		-	(4.287.797)	-	-	-	-	-	-	(4.287.797)	-	(4.287.797)	*Appropriation for general reserve*
Penghasilan komprehensif lain:													*Other comprehensive income:*
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak		-	-	-	(68.315.159)	-	-	-	-	(68.315.159)	-	(68.315.159)	*Financial assets measured at fair value through other comprehensive income, net of tax*
Pengukuran kembali atas liabilitas imbalan kerja, setelah pajak	24	-	-	-	-	-	(1.923.488)	-	-	(1.923.488)		(1.923.488)	*Remeasurements on employee benefit liabilities, net of tax*
Transaksi kombinasi bisnis entitas sepengendali	48	-	(968.382)	-	-	-	-	-	-	(968.382)	-	(968.382)	*Business combination transaction with under common control*
Laba bersih tahun berjalan		-	-	-	-	-	-	-	226.173.453	226.173.453	-	226.173.453	*Net income for the year*
Dampak kehilangan pengendalian entitas anak	48	-	-	-	11.442.173	-	(2.230.488)	(9.156.165)	9.156.165	9.211.685	(17.327)	9.194.358	*Loss of control on subsidiary*
Saldo per 31 Desember 2022		**1.584.823.471**	**670.584.856**	**-**	**(38.589.677)**	**382.456.152**	**16.819.083**	**177.200.000**	**907.169.596**	**3.700.463.481**	**-**	**3.700.463.481**	***Balance as of December 31, 2022***

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN ARUS KAS
Untuk Tahun Yang Berakhir
Pada Tanggal 31 Desember 2023
(Dinyatakan dalam Ribuan Rupiah, Kecuali Dinyatakan Lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF CASH FLOWS
For the Year Ended
December 31, 2023
(Expressed in Thousands of Rupiah, Unless Otherwise Stated)

	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31,*			
	2023	**Catatan *Notes***	**2022*)**	
ARUS KAS DARI AKTIVITAS OPERASI				***CASH FLOWS FROM OPERATING ACTIVITIES***
Penerimaan dari pendapatan bunga dan syariah dan komisi	1.866.455.131		1.585.072.007	*Receipt from interest and sharia income and commissions*
Pembayaran bunga dan syariah	(1.241.689.538)		(936.209.912)	*Payment of interest and sharia expense*
Penerimaan dari pendapatan operasional lainnya	253.716.401		363.010.679	*Receipt from other operating income*
Penerimaan dari penjualan agunan yang diambil alih	385.438.160		14.100.990	*Receipt from sale of foreclosed assets*
Pembayaran beban umum dan administrasi	(135.297.898)		(118.616.627)	*Payment of general and administrative expenses*
Pembayaran beban tenaga kerja	(161.897.333)		(132.899.824)	*Payment of personnel expenses*
Pembayaran beban operasional lainnya	(128.942.847)		(62.433.855)	*Payments of other operating expenses*
Pendapatan (pembayaran) non-operasional lainnya	3.870.773		(28.897.837)	*Receipt (payment) of other non-operating income*
Pembayaran pajak penghasilan	(16.049.378)		-	*Payment of income tax*
	825.603.471		683.125.621	
(Kenaikan)/penurunan dalam aset operasi:				*(Increase)/decrease in operating assets:*
Pinjaman yang diberikan	(3.012.792.297)		(1.435.674.433)	*Loans*
Efek-efek yang dibeli dengan janji dijual kembali	202.699.821	9	(148.717.805)	*Securities purchased under resale agreements*
Beban dibayar dimuka	(5.750.347)		(12.026.402)	*Prepaid expenses*
Penyertaan saham	26.173.818		147.361.993	*Investments in shares*
Aset hak guna	(21.754.778)		(26.880.935)	*Right-of-use assets*
Aset lain-lain	9.055.375		(20.283.799)	*Other assets*
Kenaikan/(penurunan) dalam kewajiban operasi				*Increase/(decrease) on operating liabilities:*
Simpanan nasabah	3.057.342.854		1.299.895.991	*Deposits from customers*
Simpanan dari bank lain	(230.149.261)		326.161.686	*Deposits from other banks*
Efek-efek yang dijual dengan janji dibeli kembali	402.401.570	20	240.865.160	*Securities sold under repurchase agreements*
Utang akseptasi	11.959.811		-	*Acceptance payables*
Utang pajak lainnya	14.518.346	22a	3.224.742	*Other tax payables*
Arus kas bersih diperoleh dari aktivitas operasi	**1.279.308.383**		**1.057.051.819**	***Cash flow provided from operating activities***

*) Konsolidasian sampai dengan divestasi entitas anak pada tanggal 22 Desember 2022 (Lihat Catatan 48)

Consolidation until the date of divestment of subsidiary on December 22, 2022 (See Note 48) *)

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN ARUS KAS (lanjutan)
Untuk Tahun Yang Berakhir
Pada Tanggal 31 Desember 2023
(Dinyatakan dalam Ribuan Rupiah,
Kecuali Dinyatakan Lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF CASH FLOWS (continued)
For the Year Ended
December 31, 2023
(Expressed in Thousands of Rupiah,
Unless Otherwise Stated)

	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31,*			
	2023	**Catatan** ***Notes***	**2022*)**	
ARUS KAS DARI AKTIVITAS INVESTASI				***NET CASH FLOWS FROM INVESTING ACTIVITIES***
Hasil penjualan aset tetap	45.395.525	14	17.287.045	*Proceeds from sale of fixed assets*
Pembelian aset tetap	(16.195.800)	14	(7.526.642)	*Purchase of fixed assets*
Pembelian aset tak berwujud	(7.289.250)	16	(1.879.808)	*Purchase of intangible assets*
Pembelian/(penjualan) efek-efek	(1.435.185.586)		(240.818.457)	*Purchase/(sale) of marketable securities*
Arus kas bersih digunakan untuk aktivitas investasi	**(1.413.275.111)**		**(232.937.862)**	***Net cash flow used in from investing activities***
ARUS KAS DARI AKTIVITAS PENDANAAN				***CASH FLOWS FROM FINANCING ACTIVITIES***
Penambahan modal disetor	(1.900.021)		520.909.143	*Additional paid-in capital*
Penerbitan obligasi	500.000.000	21	-	*Bonds Issuance*
Pinjaman yang diterima	-		(50.000.000)	*Loans received*
Pelunasan jatuh tempo obligasi	(200.000.000)	21	(300.000.000)	*Bonds repayment*
Pembayaran sewa	(10.757.017)		(10.958.755)	*Payment for lease*
Arus kas bersih diperoleh dari aktivitas pendanaan	**287.342.962**		**159.950.388**	***Net cash flow provided from financing activities***
KENAIKAN BERSIH KAS DAN SETARA KAS	**153.376.234**		**984.064.345**	***NET INCREASE OF CASH AND CASH EQUIVALENTS***
KAS DAN SETARA KAS PADA AWAL TAHUN	**2.645.187.929**		**1.886.562.456**	***CASH AND CASH EQUIVALENTS AT BEGINNING OF THE YEAR***
Dampak kehilangan pengendalian entitas anak	-		(225.438.872)	*Loss of control on subsidiary*
KAS DAN SETARA KAS PADA AKHIR TAHUN	**2.798.564.163**		**2.645.187.929**	***CASH AND CASH EQUIVALENTS AT END OF THE YEAR***
Kas dan setara kas terdiri dari:				*Cash and cash equivalent consist of:*
Kas	92.820.864	4	51.897.124	*Cash*
Giro pada Bank Indonesia	1.493.076.850	5	1.506.565.848	*Current accounts with Bank Indonesia*
Giro pada bank lain	296.298.919	6	228.384.427	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan Bank lain dibawah 3 bulan	916.367.530	7b	858.340.530	*Placements with Bank Indonesia and other Banks less than 3 months*
Jumlah kas dan setara kas	**2.798.564.163**		**2.645.187.929**	***Total cash and cash equivalents***

*) Konsolidasian sampai dengan divestasi entitas anak pada tanggal 22 Desember 2022 (Lihat Catatan 48)

Consolidation until the date of divestment of subsidiary on December 22, 2022 (See Note 48) *)

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

1. INFORMASI UMUM

a. Pendirian dan informasi umum

PT Bank Victoria International Tbk ("Bank") didirikan pada tanggal 28 Oktober 1992 berdasarkan Akta Notaris A. Partomuan Pohan, S.H., LL.M. No. 71 yang selanjutnya diadakan pembetulan dengan Akta No. 30 tanggal 8 Juni 1993 dari Notaris yang sama. Akta pendirian tersebut disahkan oleh Menteri Kehakiman Republik Indonesia melalui Surat Keputusan No. C2-4903.HT.01.01.TH 93 tanggal 19 Juni 1993 dan telah didaftarkan pada Kepaniteraan Pengadilan Negeri Jakarta Utara No. 342/Leg/1993 tanggal 29 Juni 1993 serta telah diumumkan dalam Berita Negara Republik Indonesia No. 39, Tambahan No. 2602 tanggal 15 Mei 1998. Anggaran Dasar Bank telah beberapa kali mengalami perubahan, perubahan terakhir Anggaran Dasar dengan Akta No. 7 tanggal 3 Juni 2022 yang dibuat dihadapan Fathiah Helmi, S.H., Notaris di Jakarta yang telah mendapat persetujuan dari Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0037529.AH.01.02.Tahun 2022 tanggal 4 Juni 2022 dan telah diterima dan dicatat dalam database Sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0103473.AH.01.11 tanggal 4 Juni 2022.

Sesuai dengan pasal 3 anggaran dasar Bank, ruang lingkup kegiatan Bank adalah menjalankan usaha sebagai bank umum sesuai dengan ketentuan dan perundang-undangan yang berlaku. Bank mulai beroperasi secara komersial pada tanggal 5 Oktober 1994 sesuai dengan izin usaha yang diberikan oleh Menteri Keuangan Republik Indonesia dalam Surat Keputusan No. 402/KMK.017/1994 tanggal 10 Agustus 1994.

Bank telah mendapatkan izin menjadi bank devisa pada tanggal 13 Desember 2016 sesuai dengan Surat Kepala Departemen Perizinan dan Informasi Perbankan - Otoritas Jasa Keuangan No. S-423/PB.12/2016 dan efektif beroperasi menjadi bank devisa pada tanggal 20 Februari 2017. Bank memperoleh izin usaha sebagai pedagang valuta asing dari Bank Indonesia berdasarkan Surat No. 029/126/UOPM tanggal 25 Maret 1997.

1. GENERAL INFORMATION

a. Establishment and general information

PT Bank Victoria International Tbk ("the Bank") was established on October 28, 1992 based on Notarial Deed No. 71 of A. Partomuan Pohan, S.H., LL.M., subsequently amended by Deed No. 30 dated June 8, 1993 from the same notary. The deed of establishment was approved by the Ministry of Justice of the Republic of Indonesia in its Decision Letter No. C2-4903.HT.01.01.TH 93 dated June 19, 1993 and was registered at the State Court Secretary in North Jakarta No. 342/Leg/1993 dated June 29, 1993 also was published in Supplement No. 2602 to the State Gazette of the Republic of Indonesia No. 39 dated May 15, 1998. The Bank's articles of association has been amended several times, and the latest was based on Notarial Deed No. 7 dated June 3, 2022 of Fatihah Helmi, S.H., a notary in Jakarta which has been approved by Ministry of Law and Human Rights of the Republic of Indonesia No. AHU-0037529.AH.01.02.TH 2022 dated June 4, 2022 and has been accepted and recorded in database of Legal Entities Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia in its Letter No. AHU-0103473.AH.01.11 dated June 4, 2022.

According to article 3 of the Bank's articles of association, the scope of Bank's activities is to engage in commercial banking activities in accordance with the existing regulations. The Bank commenced its commercial operations on October 5, 1994 based on the operating license from the Ministry of Finance of the Republic of Indonesia in its Decision Letter No. 402/KMK.017/1994 dated August 10, 1994.

Bank was approved as a foreign exchange bank on December 13, 2016 in accordance with Head of Licensing and Banking Information Department Letter - Financial Services Authority ("OJK") No. S-423/PB.12/2016 and effectively commenced as a foreign exchange bank on February 20, 2017. The Bank obtained a license as money changer from Bank Indonesia based on Letter No. 029/126/UOPM dated March 25, 1997.

1. INFORMASI UMUM (lanjutan) / *1. GENERAL INFORMATION (continued)*

a. Pendirian dan informasi umum (lanjutan) / *a. Establishment and general information (continued)*

Kantor Pusat Bank berlokasi di Graha BIP Lantai 10, Jalan Gatot Subroto Kav. 23 Jakarta. Bank memiliki kantor pusat, dengan kantor cabang utama, kantor cabang pembantu, dan kantor kas sebagai berikut (tidak diaudit):

The Bank's Head Office is located at Graha BIP 10th Floor, Jalan Gatot Subroto Kav. 23 Jakarta. The Bank has operational head office and a number of branches, sub-branches, and cash offices as follows (unaudited):

	31 Desember/*December 31,*		
	2023	**2022**	
Kantor Pusat	1	1	*Head Office*
Kantor Cabang	14	14	*Branches*
Kantor Cabang Pembantu	24	24	*Sub-Branches*

b. Penawaran umum saham dan penerbitan obligasi Bank / *b. Public offering of the Bank's shares and issuance of bonds*

Penawaran umum saham / ***Public offering of shares***

Pada tanggal 4 September 1999, Bank memperoleh pernyataan efektif dari Ketua Badan Pengawas Pasar Modal (Bapepam) melalui Surat No. S-835/PM/1999 untuk melakukan penawaran umum perdana kepada masyarakat sejumlah 250.000.000 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (nilai penuh) per saham dan sejumlah 80.000.000 Waran Seri I. Pada tanggal 30 September 1999, saham tersebut telah dicatatkan pada Bursa Efek Jakarta.

On September 4, 1999, the Bank obtained an effective notification from the Chairman of the Capital Market Supervisory Agency (Bapepam) through Letter No. S-835/PM/1999 to conduct an initial public offering of 250,000,000 shares with a par value and an offering price of Rp100 (full amount) per share and 80,000,000 Series I Warrants. On September 30, 1999, the Bank's shares have been listed in Jakarta Stock Exchange.

Pada tanggal 14 Agustus 2000, Bank memperoleh pernyataan efektif dari Ketua Bapepam melalui Surat No.S-2044/PM/2000 untuk melakukan Penawaran Umum Terbatas (PUT) I kepada para pemegang saham dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu sejumlah 614.000.000 saham dengan nilai nominal sebesar Rp100 (nilai penuh) dan harga penawaran sebesar Rp115 (nilai penuh) per saham dan sejumlah 85.960.000 Waran Seri II. Pada tanggal 28 September 2000, saham tersebut telah dicatatkan pada Bursa Efek Jakarta. Dari PUT I ini, jumlah yang diambil oleh pemegang saham yang berhak sejumlah 100.000.000 saham.

On August 14, 2000, the Bank obtained an effective notification from the Chairman of Bapepam through Letter No. S-2044/PM/2000 to conduct Limited Public Offering (LPO) I to issue Preemptive Rights of 614,000,000 shares with a par value of Rp100 (full amount) and an offering price of Rp115 (full amount) per share and 85,960,000 Series II Warrants. On September 28, 2000, these shares had been listed in Jakarta Stock Exchange. From LPO I, the shares that were undertaken by the entitled shareholders was 100,000,000 shares.

Pada tanggal 21 Februari 2003, Bank memperoleh pernyataan efektif dari Ketua Bapepam melalui Surat No. S-36/PM/2003 untuk melakukan PUT II dengan Hak Memesan Efek Terlebih Dahulu sejumlah 705.243.360 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (nilai penuh) per saham dan sejumlah 423.146.016 Waran Seri III.

On February 21, 2003, the Bank obtained an effective notification from the Chairman of Bapepam through Letter No. S-36/PM/2003 to conduct LPO II to issue Pre-emptive Rights of 705,243,360 shares with a par value and an offering price of Rp100 (full amount) per share and 423,146,016 Series III Warrants.

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum saham (lanjutan)

Pada tanggal 20 Maret 2003, saham tersebut telah dicatatkan pada Bursa Efek Jakarta. Dari PUT II ini, jumlah yang diambil oleh pemegang saham yang berhak sejumlah 400.000.000 saham.

Pada tanggal 12 September 2006, Bank memperoleh pernyataan efektif dari Ketua Badan Pengawas Pasar Modal dan Lembaga Keuangan (Bapepam dan LK) melalui Surat No. S-452/BL/2006 untuk melakukan PUT III sejumlah 670.363.760 saham dengan nilai nominal sebesar Rp100 (nilai penuh) dan harga penawaran sebesar Rp115 (nilai penuh) per saham dan sebanyak-banyaknya 469.277.676 Waran Seri IV. Pada tanggal 13 Juli 2006, saham tersebut telah dicatatkan pada Bursa Efek Indonesia. Dari PUT III ini, jumlah yang diambil oleh pemegang saham yang berhak sejumlah 670.363.760 saham.

Pada tanggal 26 Juni 2008, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-4114/BL/2008 untuk melakukan PUT IV sejumlah 1.167.498.560 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (nilai penuh) per saham dan sejumlah 630.449.220 Waran Seri V.

Pada tanggal 17 September 2011, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-6737/BL/2011 untuk melakukan PUT V sejumlah 1.954.919.259 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (nilai penuh) per saham dan sejumlah 1.448.939.990 Waran Seri VI.

Berikut adalah kronologis jumlah modal saham yang ditempatkan dan disetor penuh serta saham yang dicatatkan pada bursa efek di Indonesia sejak Penawaran Umum Perdana sampai dengan tanggal 31 Desember 2023:

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of shares (continued)

On March 20, 2003, these shares had been listed in Jakarta Stock Exchange. From LPO II, the shares that were undertaken by the entitled shareholders was 400,000,000 shares.

On September 12, 2006, the Bank obtained an effective notification from the Chairman of Capital Market and Financial Institutions Supervisory Agency (Bapepam and LK) through Letter No. S-452/BL/2006 to conduct LPO III of 670,363,760 shares with a par value of Rp100 (full amount) and an offering price of Rp115 (full amount) per share and 469,277,676 Series IV Warrants. On July 13, 2006, these shares had been listed in Indonesia Stock Exchange. From LPO III, the shares that were undertaken by the entitled shareholders was 670,363,760 shares.

On June 26, 2008, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-4114/BL/2008 to conduct LPO IV of 1,167,498,560 shares with a par value and an offering price of Rp100 (full amount) per share and 630,449,220 Series V Warrants.

On September 17, 2011, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-6737/BL/2011 to conduct LPO V of 1,954,919,259 shares with a par value and an offering price of Rp100 (full amount) per share and 1,448,939,990 Series VI Warrants.

The chronological overview of total issued and fully paid capital and shares listed at stock exchange in Indonesia from Initial Public Offering up to December 31, 2023 is as follows:

	Jumlah saham/ ***Number of shares***	
Saham yang berasal dari Penawaran Umum Perdana pada tahun 1999	250.000.000	*Shares from Initial Public Offering in 1999*
Saham yang berasal dari pendiri	250.000.000	*Founder's shares*
Saham yang berasal dari kapitalisasi saldo laba	34.000.000	*Shares from capitalisation of retained earnings*

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum saham (lanjutan)

Berikut adalah kronologis jumlah modal saham yang ditempatkan dan disetor penuh serta saham yang dicatatkan pada bursa efek di Indonesia sejak Penawaran Umum Perdana sampai dengan tanggal 31 Desember 2023: (lanjutan)

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of shares (continued)

The chronological overview of total issued and fully paid capital and shares listed at stock exchange in Indonesia from Initial Public Offering up to December 31, 2023 is as follows: (continued)

	Jumlah saham/ *Number of shares*	
Saham yang berasal dari Penawaran Umum Terbatas I dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2000	100.000.000	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) I in 2000*
Saham yang berasal dari Pelaksanaan Waran Seri I dan II pada tahun 2002	66.793.400	*Shares from Exercise of Series I and II Warrants in 2002*
Saham yang berasal dari Penawaran Umum Terbatas II dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2003	400.000.000	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) II in 2003*
Saham yang berasal dari Pelaksanaan Waran Seri III pada tahun 2004	193.799.960	*Shares from Exercise of Series III Warrants in 2004*
Saham yang berasal dari Pelaksanaan Waran Seri III pada tahun 2006	46.200.000	*Shares from Exercise of Series III Warrants in 2006*
Saham yang berasal dari Penawaran Umum Terbatas III dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2006	670.363.760	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) III in 2006*
Saham yang berasal dari Pelaksanaan Waran Seri IV pada tahun 2007	323.840.000	*Shares from Exercise of Series IV Warrants in 2007*
Saham yang berasal dari Penawaran Umum Terbatas IV dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2008	1.167.498.560	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) IV in 2008*
Saham yang berasal dari Pelaksanaan Waran Seri IV dan V pada tahun 2009	344.244.500	*Shares from Exercise of Series IV and V Warrants in 2009*
Saham yang berasal dari Pelaksanaan Waran Seri IV dan V pada tahun 2010	249.707.135	*Shares from Exercise of Series IV and V Warrants in 2010*
Saham yang berasal dari Penawaran Umum Terbatas V dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2011	1.954.919.259	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) V in 2011*
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2011	414.580.000	*Shares from Issuance of Shares without Preemptive Rights in 2011*
Saham yang berasal dari Pelaksanaan Waran Seri IV dan V pada tahun 2011	81.724.314	*Shares from Exercise of Series IV and V Warrants in 2011*
Saham yang berasal dari Pelaksanaan Waran Seri V dan VI pada tahun 2012	56.673.554	*Shares from Exercise of Series V and VI Warrants in 2012*
Saham yang berasal dari Pelaksanaan Waran Seri V dan VI pada tahun 2013	25.923.831	*Shares from Exercise of Series V and VI Warrants in 2013*
Saham yang berasal dari Pelaksanaan Waran Seri VI pada tahun 2014	508.898.707	*Shares from Exercise of Series VI Warrants in 2014*
Saham yang berasal dari Pelaksanaan Waran Seri VI pada tahun 2015	300	*Shares from Exercise of Series VI Warrants in 2015*
Saham yang berasal dari Pelaksanaan Waran Seri VI pada tahun 2016	751.486.547	*Shares from Exercise of Series VI Warrants in 2016*
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2016	780.394.335	*Shares from Exercise of Additional Shares Without Preemptive Rights in 2016*
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2019	280.898.877	*Shares from Exercise of Additional Shares Without Preemptive Rights in 2019*
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2021	1.535.185.529	*Shares from Exercise of Additional Shares Without Preemptive Rights in 2021*

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum saham (lanjutan)

Berikut adalah kronologis jumlah modal saham yang ditempatkan dan disetor penuh serta saham yang dicatatkan pada Bursa Efek Indonesia sejak Penawaran Umum Perdana sampai dengan tanggal 31 Desember 2023: (lanjutan)

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of shares (continued)

The chronological overview of total issued and fully paid capital and shares listed at Indonesia Stock Exchange from Initial Public Offering up to December 31, 2023 is as follows: (continued)

	Jumlah saham/ *Number of shares*	
Saham yang berasal dari Penawaran Umum Terbatas VI dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2022	2.553.461.919	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) VI in 2022*
Saham yang berasal dari Penawaran Umum Terbatas VII dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2022	2.807.640.227	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) VII in 2022*
Saham yang berasal dari Pelaksanaan Waran Seri VII pada tahun 2023	1.064	*Shares from Exercise of Series VII Warrants in 2023*
Jumlah modal saham yang ditempatkan dan disetor penuh	15.848.235.778*)	*Total issued and fully paid capital*

*) Jumlah modal saham yang ditempatkan dan disetor penuh termasuk 1% saham yang tidak diperdagangkan pada PT Bursa Efek Indonesia (*delisted*) sesuai ketentuan Peraturan Pemerintah RI No. 29 tahun 1999.

*Number of shares issued and fully paid *) includes 1% of delisted shares in the Indonesia Stock Exchange accordance with Government Regulation No. 29 Year 1999.*

Penawaran umum obligasi

Pada tanggal 28 Desember 1999, Bank memperoleh pernyataan efektif dari Ketua Bapepam melalui Surat No. S-2683/PM/1999 untuk melakukan penawaran umum Obligasi Bank Victoria I Tahun 2000 sejumlah Rp100.000.000. Pada tanggal 14 Maret 2000, Obligasi tersebut telah dicatatkan pada Bursa Efek Surabaya.

Pada tanggal 9 Maret 2007, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-1080/BL/2007 untuk melakukan penawaran umum Obligasi Bank Victoria II Tahun 2007 dan Obligasi Subordinasi Bank Victoria I Tahun 2007 masing-masing sejumlah Rp200.000.000. Pada tanggal 22 Maret 2007, Obligasi-obligasi tersebut telah dicatatkan pada Bursa Efek Indonesia.

Pada tanggal 19 September 2012, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-7574/BL/2012 untuk melakukan penawaran umum Obligasi Bank Victoria III Tahun 2012 dan Obligasi Subordinasi Bank Victoria II Tahun 2012 masing-masing sejumlah Rp200.000.000 dan Rp300.000.000. Pada tanggal 28 September 2012, Obligasi-obligasi tersebut telah dicatatkan pada Bursa Efek Indonesia.

Public offering of bonds

On December 28, 1999, the Bank obtained an effective notification from the Chairman of Bapepam through Letter No. S-2683/PM/1999 for the public offering of Bank Victoria Bonds I Year 2000 amounting to Rp100,000,000. On March 14, 2000, the Bonds had been listed in Surabaya Stock Exchange.

On March 9, 2007, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-1080/BL/2007 for the public offering of Bank Victoria Bonds II Year 2007 and Bank Victoria Subordinated Bonds I Year 2007, each amounting to Rp200,000,000. On March 22, 2007, the Bonds had been listed in Indonesia Stock Exchange.

On September 19, 2012, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-7574/BL/2012 for the public offering of Bank Victoria Bonds III Year 2012 and Bank Victoria Subordinated Bonds II Year 2012, amounting to Rp200,000,000 and Rp300,000,000, respectively. On September 28, 2012, the Bonds had been listed in Indonesia Stock Exchange.

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Pada tanggal 21 September 2017, Bank memperoleh pernyataan efektif dari Dewan Komisioner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-340/D.04/2017 untuk melakukan penawaran umum Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 masing-masing sejumlah Rp300.000.000 dan Rp50.000.000. Pada tanggal 12 Juli 2017, Obligasi-obligasi tersebut telah dicatatkan pada Bursa Efek Indonesia.

Pada tanggal 5 September 2018, Bank melakukan Penawaran Umum Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018. Obligasi Berkelanjutan yang ditawarkan terdiri dari 2 (dua) seri Obligasi, yaitu Seri A sejumlah Rp100.000.000 dan Seri B sejumlah Rp200.000.000, sedangkan Obligasi Subordinasi sebesar Rp350.000.000 (lihat Catatan 21).

Pada tanggal 24 September 2019, Bank memperoleh pernyataan efektif dari Dewan Komisioner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-85/D.04/2019 untuk melakukan Penawaran Umum Berkelanjutan Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 serta telah dicatatkan pada Bursa Efek Indonesia 1 Juli 2019 masing-masing sejumlah Rp100.000.000 dan Rp250.000.000.

Pada tanggal 8 November 2019, Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 sebesar Rp150.000.000.

Pada tanggal 1 April 2020, Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 sebesar Rp60.000.000.

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

On September 21, 2017, the Bank obtained the notice of effectivity from Financial Services Authority Board of Commissioner through Letter No. S-340/D.04/2017 for the public offering of Continuing Bonds I Bank Victoria Phase I year 2017 and Subordinated Bonds I Bank Victoria Phase I Year 2017 in amount of Rp300,000,000 and Rp50,000,000, respectively. On July 12, 2017, these bonds were listed on the Indonesia Stock Exchange.

On September 5, 2018, Bank continues the Public Offering of Continuing Bonds I Bank Victoria Phase II Year 2018 and Subordinated Bonds I Bank Victoria Phase II Year 2018. The Continuing Bonds offered comprise of 2 (two) series, Series A amounted to Rp100,000,000 and Series B amounted to Rp200,000,000, while the Subordinated Bonds offered amounted to Rp350,000,000 (refer to Note 21).

On September 24, 2019, Bank obtained an effective notification from the Chairman of FSA through Letter No. S-85/D.04/2019 for continuous offering of Continuing Bonds II Phase I Year 2019 and Bank Victoria Subordinated Bonds II Phase I Year 2019, which has been listed on the Indonesia Stock Exchange on July 1, 2019, amounting to Rp100,000,000 and Rp250,000,000, respectively.

On November 8, 2019, the Bank issued Bank Victoria Continuing Subordinated Bonds II Phase II Year 2019 amounting to Rp150,000,000.

On April 1, 2020, the Bank issued Bank Victoria Continuing Subordinated Bonds II Phase III Year 2020 amounting to Rp60,000,000.

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Pada tanggal 28 Februari 2023, Bank memperoleh pernyataan efektif dari Dewan Komisioner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-64/D.04/2023 untuk melakukan Penawaran Umum Berkelanjutan Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri A dan Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri B serta telah dicatatkan pada Bursa Efek Indonesia pada tanggal 10 Maret 2023 masing-masing sejumlah Rp300.000.000 dan Rp200.000.000.

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

On February 28, 2023, the Bank received an effective statement from the Financial Services Authority's ("OJK") Board of Commissioners through Letter No. S-64/D.04/2023 to conduct a Continuing Public Offering of Bank Victoria Continuing Bonds III Phase I Year 2023 Series A and Bank Victoria Continuing Bonds III Phase I Year 2023 Series B, which were listed on the Indonesian Stock Exchange on March 10, 2023, each amounting to Rp300,000,000 and Rp200,000,000 respectively.

c. Entitas Anak

Bank merupakan pemegang saham pengendali dan memiliki pengaruh signifikan atas Entitas Anak sebagai berikut:

c. Subsidiaries

The Bank is the controlling stockholder and has a significant control over the Subsidiaries as follows:

Entitas Anak/ *Subsidiary*	Jenis usaha/ *Nature of business*	Persentase kepemilikan/ *Percentage of ownership*	Tahun operasi komersial/ *Start of commercial operations*	Jumlah aset/ *Total Assets*	
				31 Desember/ *December 31,* 2023	31 Desember/ *December 31,* 2022
Reksadana / *Mutual Funds*:					
Batavia Proteksi Andalan 7	Reksadana Terproteksi	100%	-	154.465.120	154.801.103
Mega Dana Terproteksi VIII	Reksadana Terproteksi	100%	-	42.485.675	42.491.687
Maybank Dana Terproteksi 1	Reksadana Terproteksi	99,77%	-	44.746.823	44.711.361
BNI AM Proteksi XL VIII	Reksadana Terproteksi	-	-	-	104.207.228
Reksadana terproteksi Sucorinvest Proteksi 8	Reksadana Terproteksi	-	-	-	100.740.694
Entitas Asosiasi / *Associate Entity*:					
PT Bank Victoria Syariah	*Sharia banking*	19,81%	1966	-	-

Berdasarkan Akta Notaris Veronika Lily Dharma, S.H. No. 15 tanggal 7 September 2007, Notaris di Jakarta, Bank mengakuisisi 99,80% saham PT Bank Swaguna ("Entitas Anak"). Pada tanggal 13 Desember 2007, Bank melakukan penambahan modal di Entitas Anak sehingga kepemilikan Bank menjadi 99,98% sesuai dengan Akta Notaris Veronika Lily Dharma, S.H. No. 26 tanggal 13 Desember 2007.

Based on Notarial Deed No. 15 dated September 7, 2007 of Veronika Lily Dharma, S.H., a Notary in Jakarta, the Bank acquired 99.80% shareholding of PT Bank Swaguna ("Subsidiary"). On December 13, 2007, the Bank had an additional capital in the Subsidiary which increased the Bank's ownership to 99.98% based on Notarial Deed No. 26 of Veronika Lily Dharma, S.H. dated December 13, 2007.

1. INFORMASI UMUM (lanjutan)

c. Entitas Anak (lanjutan)

Pada tanggal 30 Maret 2017 dan 18 Desember 2017, setelah mendapatkan persetujuan OJK berdasarkan Surat No. S-33/PB.33/2017 tanggal 30 Maret 2017 dan No. S-170/PB.33/2017 tanggal 18 Desember 2017, Bank melakukan penambahan modal pada Entitas Anak sebesar Rp60.000.000.000 dan Rp40.000.000.000 (nilai penuh) sehingga kepemilikan Bank menjadi 99,99%.

Pada tanggal 24 Oktober 2019, Bank melakukan penambahan modal pada Entitas Anak sebesar Rp50.000.000.000 (nilai penuh) sehingga kepemilikan Bank menjadi 99,99% dan telah mendapatkan persetujuan OJK berdasarkan Surat No. S-53/PB.33/2019 tanggal 22 Oktober 2019.

Entitas Anak telah mengalami perubahan nama menjadi PT Bank Victoria Syariah sesuai dengan Akta No. 5 tanggal 6 Agustus 2009 dan Akta No. 24 tanggal 27 November 2009 dari Notaris Erni Rohaini, S.H., M.B.A., Notaris di Jakarta. Akta tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-02731.AH.01.02. tahun 2010 tanggal 19 Januari 2010. Perubahan kegiatan usaha bank umum konvensional menjadi bank umum syariah telah mendapatkan izin dari Bank Indonesia berdasarkan Keputusan Gubernur Bank Indonesia No. 12/8/KEP.GBI/DPG/2010 tertanggal 10 Februari 2010. Selanjutnya, Entitas Anak beroperasi dengan prinsip Syariah mulai tanggal 1 April 2010.

Pada tanggal 22 Desember 2022, Bank melakukan divestasi 80% kepemilikan di entitas anak, PT Bank Victoria Syariah, oleh karena itu sejak 23 Desember 2022, Bank tidak lagi mengendalikan PT Bank Victoria Syariah. Lihat Catatan 48 atas laporan keuangan untuk penjelasan lebih lanjut atas divestasi.

1. GENERAL INFORMATION (continued)

c. Subsidiaries (continued)

On March 30, 2017 and December 18, 2017, after obtaining approval from OJK based on Letter No. S-33/PB.33/2017 dated March 30, 2017 and No. S-170/PB.33/2017 dated December 18, 2017, the Bank put additional capital of Rp60,000,000,000 and Rp40,000,000,000 (full amount) into Subsidiary, which increase the Bank's ownership to 99.99%.

On October 24, 2019, the Bank put additional capital of Rp50,000,000,000 (full amount) into Subsidiary, which increase the Bank's ownership to 99.99% and obtained the approval from OJK based on Letter No. S-53/PB.33/2019 dated October 22, 2019.

The Subsidiary changed its name to PT Bank Victoria Syariah based on Deed No. 5 dated August 6, 2009 and No. 24 dated November 27, 2009 of Erni Rohaini, S.H., M.B.A., a Notary in Jakarta. The notarial deed was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in its Decision Letter No. AHU-02731.AH.01.02 Year 2010 dated January 19, 2010. The changes of subsidiary's business from conventional banking to sharia banking was approved by Bank Indonesia based on the Decision of the Governor of Bank Indonesia No. 12/8/KEP.GBI/DPG/2010 dated February 10, 2010. The Subsidiary started its operations as a Sharia Bank on April 1, 2010.

On December 22, 2022, Bank divested 80% ownership in subsidiary, PT Bank Victoria Syariah, therefore since December 23, 2022, Bank is no longer controlled PT Bank Victoria Syariah. Refer to Note 48 to the financial statements for further explanation on divestment.

1. INFORMASI UMUM (lanjutan)

d. Dewan Komisaris dan Direksi, Komite dan Karyawan

Susunan Dewan Komisaris dan Direksi Bank pada tanggal 31 Desember 2023 dan 2022 adalah sebagai berikut:

1. GENERAL INFORMATION (continued)

d. Boards of Commissioners and Directors, Committee and Employees

The composition of the Bank's Boards of Commissioners and Directors as of December 31, 2023 and 2022 are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Dewan Komisaris			***Board of Commissioners***
Komisaris Utama	Zaenal Abidin	Zaenal Abidin	*President Commissioner*
Komisaris Independen	Gunawan Tenggarahardja	Gunawan Tenggarahardja	*Independent Commisioner*
Komisaris	Sia Leng Ho	Sia Leng Ho	*Commissioner*
Direksi			***Board of Directors***
Direktur Utama	Achmad Friscantono	Achmad Friscantono	*President Director*
Wakil Direktur Utama	Rusli	Rusli	*Vice President Director*
Direktur	Debora Wahjutirto Tanoyo	Debora Wahjutirto Tanoyo	*Director*
Direktur	Lembing	Lembing	*Director*
Direktur Kepatuhan dan Manajemen Risiko	Tamunan	Tamunan	*Risk Management and Compliance Director*

Susunan Dewan Komisaris dan Direksi pada tanggal 31 Desember 2023 dan 2022 tersebut di atas telah diterima dan dicatat di dalam database Sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan Surat No. AHU-AH.01.09-0067031 tanggal 19 Oktober 2022.

*The composition of the Boards of Commissioners and Directors as of December 31, 2023 and 2022 had been accepted and recorded in the database of Legal Entities Administration System of the Ministry of Laws and Human Rights of the Republic of Indonesia in its Letter No. AHU-AH.01.09-*0067031 *dated October 19, 2022.*

Susunan Komite Audit pada tanggal 31 Desember 2023 dan 2022 adalah sebagai berikut:

The composition of the Audit Committee as of December 31, 2023 and 2022 are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Ketua	Zaenal Abidin	Zaenal Abidin	*Chairman*
Anggota	Yozef Abdulrachman	Yozef Abdulrachman	*Member*
Anggota	Medi Sejati	Medi Sejati	*Member*

Pembentukan Komite Audit Bank telah sesuai dengan Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 tanggal 23 Desember 2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit dan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tanggal 14 September 2023 tentang Penerapan Tata Kelola Bagi Bank Umum.

Establishment of the Bank's Audit Committee is in compliance with Financial Service Authority regulation No. 55/POJK.04/2015 dated December 23, 2015 regarding Establishment and Guideline for Implementation Duty of Audit Committee and Financial Service Authority regulation No. 17 Year 2023 dated September 14, 2023 regarding the Implementation of Governance for Commercial Banks.

1. INFORMASI UMUM (lanjutan) / *1. GENERAL INFORMATION (continued)*

d. Dewan Komisaris dan Direksi, Komite dan Karyawan (lanjutan) / *d. Boards of Commissioners and Directors, Committee and Employees (continued)*

Susunan Komite Pemantau Risiko pada tanggal 31 Desember 2023 dan 2022 adalah sebagai berikut:

The composition of the Risk Monitoring Committee as of December 31, 2023 and 2022 are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Ketua	Gunawan Tenggarahardja	Gunawan Tenggarahardja	*Chairman*
Anggota	Zaenal Abidin	Zaenal Abidin	*Member*
Anggota	Yozef Abdulrachman	Yozef Abdulrachman	*Member*
Anggota	Medi Sejati	Medi Sejati	*Member*

Susunan Komite Nominasi dan Remunerasi pada tanggal 31 Desember 2023 dan 2022 adalah sebagai berikut:

The composition of the Nomination and Remuneration Committee as of December 31, 2023 and 2022 are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Ketua	Gunawan Tenggarahardja	Gunawan Tenggarahardja	*Chairman*
Anggota	Sia Leng Ho	Sia Leng Ho	*Member*
Anggota	Syahda Chandra	Syahda Chandra	*Member*

Sekretaris Perusahaan dan Kepala Internal Audit pada tanggal 31 Desember 2023 dan 2022 adalah sebagai berikut:

The Corporate Secretary and Internal Audit Head as of December 31, 2023 and 2022 are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Sekretaris Perusahaan	Caprie Ardira Azhar	Caprie Ardira Azhar	*Corporate Secretary*
Kepala Internal Audit	Djoko Soenjojo	Djoko Soenjojo	*Internal Audit Head*

Pada tanggal 31 Desember 2023 dan 2022, Bank memiliki karyawan masing-masing sejumlah 713 dan 688 karyawan (tidak diaudit).

As of December 31, 2023 and 2022, the Bank had 713 dan *688 employees, respectively (unaudited).*

e. Pemegang saham akhir / *e. Ultimate shareholders*

Pemegang saham pengendali langsung dan pemegang saham akhir Bank pada tanggal 31 Desember 2023 dan 2022 adalah masing-masing PT Victoria Investama Tbk dan Suzanna Tanojo.

The direct controlling shareholder and ultimate shareholder of the Bank as of December 31, 2023 and 2022 are PT Victoria Investama Tbk and Suzanna Tanojo, respectively.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL

Manajemen Bank bertanggungjawab atas penyusunan dan penyajian wajar laporan keuangan ini sesuai dengan Standar Akuntansi Keuangan di Indonesia, yang diselesaikan dan diotorisasi untuk diterbitkan oleh Direksi Bank pada tanggal 27 Maret 2024.

Kebijakan akuntansi utama yang diterapkan dalam penyusunan laporan keuangan adalah seperti dijabarkan di bawah ini:

a. Dasar penyajian laporan keuangan

Laporan keuangan disusun sesuai dengan dengan Standar Akuntansi Keuangan di Indonesia yang mencakup Pernyataan dan Interpretasi yang diterbitkan oleh Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia dan Dewan Standar Akuntansi Syariah Ikatan Akuntan Indonesia serta Peraturan Badan Pengawas Pasar Modal dan Lembaga Keuangan (sekarang Otoritas Jasa Keuangan ("OJK")) No. VIII.G.7 tentang "Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik".

Laporan keuangan disusun berdasarkan harga perolehan kecuali untuk aset keuangan yang diukur pada nilai wajar melalui pendapatan komprehensif lain ("FVOCI") dan aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi ("FVTPL"). Laporan keuangan disusun berdasarkan akuntansi berbasis akrual, kecuali untuk laporan arus kas.

Laporan keuangan untuk Entitas Anak yang bergerak di bidang Syariah, disusun berdasarkan Pernyataan Standar Akuntansi Keuangan (PSAK) 101 (Revisi 2016) "Penyajian Laporan Keuangan Syariah", PSAK 102 (Revisi 2019) "Akuntansi *Murabahah*", PSAK 104 (Revisi 2016), "Akuntansi *Istishna*", PSAK 105, "Akuntansi *Mudharabah*", PSAK 106, "Akuntansi *Musyarakah*", PSAK 107 (Revisi 2016), "Akuntansi *Ijarah*", PSAK 110 (Revisi 2015) "Akuntansi Sukuk", PSAK 111, "Akuntansi Wa'd", Pedoman Akuntansi Perbankan Syariah Indonesia ("PAPSI"), dan Standar Akuntansi Keuangan di Indonesia, termasuk pedoman akuntansi dan pelaporan yang ditetapkan oleh OJK.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION

The Bank's management is responsible for the preparation and fair presentation of these financial statements, which were completed and authorised for issuance by the Board of Directors of the Bank on March 27, 2024.

The principal accounting policies adopted in preparing the financial statements of the Bank are set out below:

a. Basis of preparation of the financial statements

The financial statements were prepared in accordance with Indonesian Financial Accounting Standards issued by the Board of Financial Accounting Standards of Indonesian Institute of Accountants and the Board of Syariah Accounting Standards of the Indonesian Institute of Accountants and the Regulation of Badan Pengawas Pasar Modal dan Lembaga Keuangan (currently the Indonesian Financial Service Authority ("OJK")) No. VIII.G.7 regarding "Financial Statements Presentation Guidelines".

The financial statements have been prepared under the historical cost convention, except for financial assets measure as fair value through other comprehensive income ("FVOCI") and financial assets held at fair value through profit or loss ("FVTPL"). The financial statements are prepared under the accrual basis of accounting, except for the statement of cash flows.

The financial statements of a Subsidiary company engaged in sharia banking are prepared under the Statement of Financial Accounting Standard (SFAS) 101 (Revised 2016) "Presentation of Sharia Financial Statement", SFAS 102 (Revised 2019), "Murabahah Accounting", SFAS 104 (Revised 2016), "Istishna Accounting", SFAS 105, "Mudharabah Accounting", SFAS 106, "Musyarakah Accounting", SFAS 107 (Revised 2016), "Ijarah Accounting", SFAS 110 (Revised 2015) "Sukuk Accounting", SFAS 111, "Wa'd Accounting", Accounting Guidelines for Indonesian Sharia Banking ("PAPSI"), and Indonesian Financial Accounting Standards, including accounting and reporting guidance issued by OJK.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

a. Dasar penyajian laporan keuangan (lanjutan)

Seluruh angka dalam laporan keuangan ini, kecuali dinyatakan secara khusus, dibulatkan menjadi dan disajikan dalam ribuan Rupiah yang terdekat.

Laporan arus kas disusun dengan menggunakan metode langsung dengan mengelompokkan arus kas dalam aktivitas operasi, investasi, dan pendanaan. Untuk tujuan laporan arus kas, kas dan setara kas mencakup kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, dan Sertifikat Bank Indonesia yang jatuh tempo dalam 3 (tiga) bulan atau kurang sejak tanggal perolehan yang tidak dijaminkan atau dibatasi penggunaannya.

Penyusunan laporan keuangan sesuai dengan Standar Akuntansi Keuangan di Indonesia mengharuskan penggunaan estimasi dan asumsi. Hal tersebut juga mengharuskan manajemen untuk membuat pertimbangan dalam proses penerapan kebijakan akuntansi Bank. Area yang kompleks atau memerlukan tingkat pertimbangan yang lebih tinggi atau area di mana asumsi dan estimasi dapat berdampak signifikan terhadap laporan keuangan diungkapkan di Catatan 3.

b. Perubahan kebijakan akuntansi yang signifikan

Bank menerapkan pertama kali seluruh standar baru dan/atau yang direvisi yang berlaku efektif untuk periode yang dimulai pada atau setelah 1 Januari 2023, termasuk standar yang direvisi berikut ini yang mempengaruhi laporan keuangan:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

a. Basis of preparation of the financial statements (continued)

All figures in the financial statements are rounded to and stated in thousands of Rupiah, unless otherwise stated.

The statement of cash flows were prepared based on the direct method with cash flows classified into cash flows from operating, investing, and financing activities. For the purpose of the statement of cash flows, cash and cash equivalents include cash, current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks, and Certificates of Bank Indonesia maturing within 3 (three) months or less from the date of acquisition and are not pledged or restricted.

The preparation of financial statements in accordance with Indonesian Financial Accounting Standards requires the use of estimates and assumptions. It also requires management to make judgements in the process of implementing the Bank's accounting policies. The area that is complex or requires a higher level of consideration or areas where assumptions and estimates could have a significant impact on the financial statements are disclosed in Note 3.

b. Change in significant accounting policies

The Bank made first time adoption of all the new and/or revised standards effective for the periods beginning on or after January 1, 2023, including the following revised standards that have affected the financial statement:

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan kebijakan akuntansi yang signifikan (lanjutan)

Amandemen PSAK 1: Penyajian laporan keuangan - Pengungkapan Kebijakan Akuntansi

Amandemen ini memberikan panduan untuk membantu entitas menerapkan pertimbangan materialitas dalam pengungkapan kebijakan akuntansi. Amandemen tersebut bertujuan untuk membantu entitas menyediakan pengungkapan kebijakan akuntansi yang lebih berguna dengan mengganti persyaratan dalam mengungkapkan kebijakan akuntansi 'signifikan' entitas menjadi persyaratan untuk mengungkapkan kebijakan akuntansi 'material' entitas dan menambahkan panduan tentang bagaimana entitas menerapkan konsep materialitas dalam membuat keputusan tentang pengungkapan kebijakan akuntansi.

Amandemen tersebut berdampak pada pengungkapan kebijakan akuntansi Bank, namun tidak berdampak pada pengukuran, pengakuan atau penyajian *item* apa pun dalam laporan keuangan Bank.

Amandemen PSAK 25: Kebijakan Akuntansi, Perubahan Estimasi Akuntansi, dan Kesalahan terkait Definisi Estimasi Akuntansi

Amandemen PSAK 25 memperjelas perbedaan antara perubahan estimasi akuntansi, perubahan kebijakan akuntansi dan koreksi kesalahan. Amandemen juga mengklarifikasi bagaimana entitas menggunakan teknik pengukuran dan input untuk mengembangkan estimasi akuntansi.

Amandemen ini tidak memiliki dampak terhadap laporan keuangan.

Amandemen PSAK 46: Pajak Penghasilan Pajak Tangguhan Terkait Aset dan Liabilitas Yang Timbul Dari Transaksi Tunggal

Amandemen PSAK 46 Pajak Penghasilan mempersempit ruang lingkup pengecualian pengakuan awal, sehingga tidak lagi berlaku pada transaksi yang menimbulkan perbedaan temporer dapat dikurangkan dalam jumlah yang sama dan perbedaan temporer kena pajak dan seperti sewa dan liabilitas dekomisioning.

Amandemen ini tidak mempunyai dampak terhadap laporan keuangan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

b. Change in significant accounting policies (continued)

Amendment of PSAK 1: Presentation of financial statement - Disclosure of accounting policies

This amendments provide guidance to help entities apply materiality judgements to accounting policy disclosures. The amendments aim to help entities provide accounting policy disclosures that are more useful by replacing the requirement for entities to disclose their 'significant' accounting policies with a requirement to disclose their 'material' accounting policies and adding guidance on how entities apply the concept of materiality in making decisions about accounting policy disclosures.

The amendments have had an impact on the Bank's disclosures of accounting policies, but not on the measurement, recognition or presentation of any items in the Bank's financial statements.

Amendment of PSAK 25: Accounting Policies, Changes in Accounting Estimates and Errors - Definition of Accounting Estimates

The amendments to PSAK 25 clarify the distinction between changes in accounting estimates, changes in accounting policies and the correction of errors. They also clarify how entities use measurement techniques and inputs to develop accounting estimates.

The amendments had no impact on the financial statement.

Amendment of PSAK 46: Income Taxes Deferred Tax related to Assets and Liabilities arising from a Single Transaction

The amendments to PSAK 46 Income Taxes narrow the scope of the initial recognition exception, so that it no longer applies to transactions that give rise to equal taxable and deductible temporary differences such as leases and decommissioning liabilities.

The amendments had no impact on the financial statement.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Prinsip konsolidasi

Laporan keuangan konsolidasian meliputi laporan keuangan Bank beserta seluruh Entitas Anak yang berada di bawah pengendalian Bank. Entitas Anak adalah entitas (termasuk entitas terstruktur) dimana Bank memiliki pengendalian. Bank mengendalikan entitas lain ketika Bank terekspos atas, atau memiliki hak atas imbal hasil variabel dari keterlibatannya dengan Entitas Anak dan memiliki kemampuan untuk mempengaruhi imbal hasil tersebut melalui kekuasaannya atas Entitas Anak.

Laporan keuangan dari Entitas Anak dimasukkan ke dalam laporan keuangan konsolidasian sejak tanggal pengendalian dimulai sampai dengan tanggal pengendalian berakhir.

Dampak signifikan dari seluruh transaksi dan saldo antara perusahaan-perusahaan yang dikonsolidasikan telah dieliminasi dalam penyajian laporan keuangan konsolidasian, sehingga laporan keuangan konsolidasian hanya mencakup transaksi dan saldo dengan pihak lain.

Kebijakan akuntansi penting yang dipakai dalam penyajian laporan keuangan konsolidasian telah diterapkan secara konsisten oleh Bank, kecuali dinyatakan secara khusus.

Kepentingan nonpengendali disajikan di ekuitas dalam laporan posisi keuangan konsolidasian dan dinyatakan sebesar proporsi pemegang saham nonpengendali atas laba tahun berjalan dan ekuitas Entitas Anak tersebut berdasarkan persentase kepemilikan pemegang saham nonpengendali pada Entitas Anak tersebut.

Dalam hal pengendalian terhadap Entitas Anak dimulai atau diakhiri dalam suatu tahun berjalan, maka hasil usaha Entitas Anak yang diperhitungkan ke dalam laporan keuangan konsolidasian hanya sebatas hasil pada saat pengendalian tersebut mulai diperoleh atau hingga saat pengendalian itu berakhir.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

c. Basis of consolidation

The consolidated financial statements include the financial statements of the Bank and its Subsidiaries that are controlled by the Bank. Subsidiaries are all entities (including structured entities) over which the Bank has control. The Bank controls an entity when the Bank is exposed to, or has rights to, variable returns from its involvement with the Subsidiary and has the ability to affect those returns through its power over the Subsidiary.

The financial statements of Subsidiary are included in the consolidated financial statements from the date on which control commences until the date when control ceases.

The significant effects of all transactions and balances between the consolidated companies have been eliminated in preparing the consolidated financial statements, accordingly, the consolidated financial statements include only transactions and balances with other parties.

The significant accounting policies adopted in preparing the consolidated financial statements have been consistently applied by the Bank, unless otherwise stated.

Non-controlling interest is presented as part of equity in the consolidated statements of financial position and represents the non-controlling shareholder's proportionate share in the net income for the year and equity of the Subsidiary based on the percentage of ownership of the non-controlling shareholders in the Subsidiary.

Where Subsidiary either began or ceased to be controlled during the year, the results of operations of those Subsidiaries are included in the consolidated financial statements only from the date that the control has commenced or up to the date that the control has ceased.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan

(i) Aset keuangan

Sesuai dengan PSAK 71, terdapat tiga klasifikasi pengukuran aset keuangan:

(A) Biaya perolehan diamortisasi;
(B) Diukur pada nilai wajar melalui laba rugi ("FVTPL"); dan
(C) Diukur pada nilai wajar melalui penghasilan komprehensif lain ("FVOCI").

Aset keuangan diklasifikasikan menjadi kategori tersebut di atas berdasarkan model bisnis dimana aset keuangan tersebut dimiliki dan karakteristik arus kas kontraktualnya. Model bisnis merefleksikan bagaimana kelompok aset keuangan dikelola untuk mencapai tujuan bisnis tertentu.

Aset keuangan dapat diukur dengan biaya perolehan diamortisasi hanya jika memenuhi kedua kondisi berikut dan tidak ditetapkan sebagai FVTPL:

- Aset keuangan dikelola dalam model bisnis yang bertujuan untuk memiliki aset keuangan untuk tujuan mendapatkan arus kas kontraktual (*held to collect*); dan
- Kriteria kontraktual dari aset keuangan yang pada tanggal tertentu menghasilkan arus kas yang merupakan pembayaran pokok dan bunga semata ("SPPI") dari jumlah pokok terutang.

Suatu aset keuangan diukur pada FVOCI, hanya jika memenuhi kedua kondisi berikut dan tidak ditetapkan sebagai FVTPL:

- Aset keuangan dikelola dalam model bisnis yang tujuan tercapai dengan mendapatkan arus kas kontraktual dan menjual aset keuangan (*held to collect and sell*); dan
- Kriteria kontraktual dari aset keuangan yang pada tanggal tertentu menghasilkan arus kas yang merupakan pembayaran pokok dan bunga semata dari jumlah pokok terutang.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities

(i) Financial assets

In accordance with SFAS 71, there are three measurement classifications for financial assets:

(A) Amortised cost;
(B) Fair value through profit or loss ("FVTPL"); and
(C) Fair value through other comprehensive income ("FVOCI").

Financial assets are classified into these categories based on the business model within which they are held and their contractual cash flow characteristics. The business model reflects how groups of financial assets are managed to achieve a particular business objective.

A financial asset is measured at amortised cost only if it meets both of the following conditions and it is not designated as at FVTPL:

- *The financial assets is held within a business model whose objective is to hold the asset to collect contractual cash flows (held to collect); and*
- *Its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest ("SPPI") on the principal amount outstanding.*

A financial asset measured at FVOCI only if it meets both of the following conditions and is not designated as at FVTPL:

- *The financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling the financial asset (held to collect and sell); and*
- *Its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.*

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(i) Aset keuangan (lanjutan)

Seluruh aset keuangan yang tidak diklasifikasikan sebagai diukur dengan biaya perolehan diamortisasi atau FVOCI sebagaimana ketentuan di atas diukur dengan FVTPL.

Aset dapat dijual dari portofolio *held to collect* ketika terdapat peningkatan risiko kredit. Penghentian untuk alasan lain diperbolehkan namun jumlah penjualan tersebut harus tidak signifikan jumlahnya atau tidak sering.

Laba rugi yang belum direalisasi atas aset keuangan yang diklasifikasikan sebagai FVOCI ditangguhkan di pendapatan komprehensif lain sampai aset tersebut dihentikan.

Aset keuangan dapat ditetapkan sebagai FVTPL hanya jika ini dapat mengeliminasi atau mengurangi *accounting mismatch.*

Penilaian apakah arus kas kontraktual hanya merupakan pembayaran pokok dan bunga semata

Untuk tujuan penilaian ini, 'pokok' didefinisikan sebagai nilai wajar dari aset keuangan pada pengakuan awal. 'Bunga' didefinisikan sebagai imbalan untuk nilai waktu atas uang dan untuk risiko kredit yang terkait dengan jumlah pokok yang terutang selama periode waktu tertentu dan untuk risiko dan biaya pinjaman dasar lainnya (misalnya risiko likuiditas dan biaya administrasi), serta marjin keuntungan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(i) Financial assets (continued)

All financial assets not classified as measured at amortised cost or FVOCI as described above are measured at FVTPL.

Assets may be sold out of held to collect portfolios where there is an increase in credit risk. Disposals for other reasons are permitted but such sales should be insignificant in value or infrequent in nature.

Unrealised gains or losses of financial assets held at FVOCI deferred in other comprehensive income until the asset is derecognised.

Financial assets may be designated at FVTPL only if doing so eliminates or reduces accounting mismatch.

Assessment of whether contractual cash flows are solely payments of principal and interest

For the purposes of this assessment, 'principal' is defined as the fair value of the financial asset on initial recognition. 'Interest' is defined as consideration for the time value of money and for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs (e.g. liquidity risk and administrative costs), as well as profit margin.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(i) Aset keuangan (lanjutan)

Dalam menilai apakah arus kas kontraktual adalah SPPI, Bank mempertimbangkan ketentuan kontraktual instrumen tersebut. Hal ini termasuk menilai apakah aset keuangan mengandung ketentuan kontraktual yang dapat mengubah waktu atau jumlah arus kas kontraktual sehingga tidak memenuhi kondisi ini. Dalam melakukan penilaian, Bank mempertimbangkan:

- Kejadian kontinjensi yang akan mengubah jumlah dan waktu arus kas;
- Fitur *leverage;*
- Persyaratan pelunasan dipercepat dan perpanjangan fasilitas;
- Ketentuan yang membatasi klaim Bank atas arus kas dari aset tertentu (seperti pinjaman *non-recourse*); dan
- Fitur yang memodifikasi imbalan dari nilai waktu atas uang (seperti penetapan ulang suku bunga berkala).

Penilaian model bisnis

Model bisnis mengacu pada bagaimana aset keuangan dikelola bersama untuk menghasilkan arus kas untuk Bank. Arus kas mungkin dihasilkan dengan menerima arus kas kontraktual, menjual aset keuangan atau keduanya. Model bisnis ditentukan pada tingkat agregasi di mana kelompok aset dikelola bersama untuk mencapai tujuan tertentu dan tidak bergantung pada niat manajemen pada instrumen individual.

Bank menilai model bisnis pada aset keuangan setidaknya pada tingkat lini bisnis atau pada di mana terdapat variasi mandat/tujuan dalam lini bisnis, pada lini bisnis produk atau pada tingkat *desk* yang lebih granular (misalnya sub-portofolio atau sub-lini bisnis).

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(i) Financial assets (continued)

In assessing whether the contractual cash flows are SPPI, the Bank considers the contractual terms of the instrument. This includes assessing whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition. In making the assessment, the Bank considers:

- *Contingent events that would change the amount and timing of cash flows;*
- *Leverage features;*
- *Prepayment and extension terms;*
- *Terms that limit the Bank's claim to cash flows from specified assets (e.g. non-recourse loans); and*
- *Features that modify consideration of the time value of money (e.g. periodical reset of interest rates).*

Business model assessment

Business model refers to how financial assets are managed together to generate cash flows for the Bank. This may be collecting contractual cash flows, selling financial assets or both. Business models are determined at a level of aggregation where groups of assets are managed together to achieve a particular objective and do not depend on management's intentions for individual instruments.

The Bank assesses the business model of financial assets at least at business line level or where there are varying mandates or objectives within a business line, at a more granular product business line or desk level (i.e. sub-portfolios or sub-business lines).

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(i) Aset keuangan (lanjutan)

Penilaian model bisnis (lanjutan)

Penentuan model bisnis dilakukan dengan mempertimbangkan semua bukti relevan yang tersedia pada tanggal penilaian. Ini termasuk, tetapi tidak terbatas pada:

- bagaimana kinerja bisnis dan aset keuangan yang ada di dalam unit bisnis itu dievaluasi dan dilaporkan kepada manajemen. Tingkat pemisahan yang diidentifikasi untuk klasifikasi PSAK 71 harus konsisten dengan bagaimana portofolio aset dipisahkan dan dilaporkan kepada manajemen;
- risiko yang mempengaruhi kinerja unit bisnis dan aset keuangan yang dimiliki dalam unit bisnis itu dan khususnya bagaimana risiko itu dikelola; dan
- bagaimana manajer unit bisnis dikompensasi (misalnya, apakah kompensasi didasarkan pada nilai wajar dari aset yang dikelola atau pada arus kas kontraktual yang dikumpulkan).

Penentuan model bisnis dilakukan berdasarkan skenario yang diperkirakan akan terjadi oleh Bank dan tidak dalam kondisi sangat tertekan atau 'kondisi terburuk'. Jika aset dijual dalam kondisi yang tidak diharapkan oleh Bank untuk berlaku ketika aset diakui, klasifikasi aset keuangan yang ada dalam portofolio tidak disajikan secara tidak akurat, tetapi kondisi tersebut harus dipertimbangkan untuk aset yang diperoleh di masa mendatang.

Pemilihan model operasi dalam PSAK 71 dirancang sedemikian rupa sehingga akuntansi untuk instrumen di FVTPL adalah pilihan yang tepat/*conscious*.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(i) Financial assets (continued)

Business model assessment (continued)

Business model determinations are made considering all relevant evidence that is available at the date of the assessment. This includes, but is not limited to:

- *how the performance of the business and the financial assets held within that business unit are evaluated and reported to management. The level of segregation identified for SFAS 71 classification should be consistent with how asset portfolios are segregated and reported to senior management;*
- *the risks that affect the performance of the business unit and the financial assets held within that business unit and in particular the way those risks are managed; and*
- *how managers of the business unit are compensated (for example, whether the compensation is based on the fair value of the assets managed or on the contractual cash flows collected).*

Business model determinations are made on the basis of scenarios that the Bank reasonably expects to occur and not under highly stressed or 'worst case' conditions. Where assets are disposed of under conditions that the Bank did not reasonably expect to prevail when the assets were recognised, the classification of existing financial assets in the portfolio are not rendered inaccurate but the conditions in question should be considered for any assets acquired going forward.

The targeting operating model for SFAS 71 is designed such that accounting for instruments at FVTPL is a conscious choice.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(i) Aset keuangan (lanjutan)

Penilaian model bisnis (lanjutan)

Perubahan pada model bisnis atau pengenalan model bisnis baru ditentukan melalui proses persetujuan unit bisnis baru.

Bank dapat mereklasifikasi seluruh aset keuangan yang terpengaruh jika dan hanya jika, model bisnis untuk pengelolaan aset keuangan berubah.

Pengakuan

Pembelian dan penjualan aset keuangan yang lazim (reguler) diakui pada tanggal perdagangan dimana Bank memiliki komitmen untuk membeli atau menjual aset tersebut.

Pada saat pengakuan awal, aset keuangan diukur pada nilai wajar ditambah/dikurangi (untuk *item* yang tidak diukur pada nilai wajar melalui laba rugi setelah pengakuan awal) biaya transaksi yang dapat diatribusikan secara langsung atas perolehan aset keuangan. Pengukuran aset keuangan setelah pengakuan awal tergantung pada klasifikasi aset keuangan tersebut.

Biaya transaksi hanya meliputi biaya-biaya yang dapat diatribusikan secara langsung untuk perolehan suatu aset keuangan dan merupakan biaya tambahan yang tidak akan terjadi apabila instrumen keuangan tersebut tidak diperoleh.

Aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi pada awalnya dicatat sebesar nilai wajar dan biaya transaksinya dibebankan pada laporan laba rugi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(i) Financial assets (continued)

Business model assessment (continued)

Changes to business models or the introduction of new business models are determined through the new business unit approval process.

The Bank can reclassified all of its financial assets when and only, its business model for managing those financial assets changes.

Recognition

Regular way purchases and sales of financial assets are recognised on the trade date at which the Bank commits to purchase or sell those assets.

A financial asset is initially measured at fair value plus/less (for an item not subsequently measured at fair value through profit or loss) transaction costs that are directly attributable to the acquisition of a financial asset. The subsequent measurement of financial assets depends on their classification.

Transaction costs include only those costs that are directly attributable to the acquisition of a financial asset are incremental costs that would not have been incurred if the instrument had not been acquired.

Financial assets carried at fair value through profit or loss are initially recognised at fair value and transaction costs are expensed in the profit or loss.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(ii) Liabilitas keuangan

Liabilitas keuangan diklasifikasikan ke dalam kategori sebagai berikut pada saat pengakuan awal:

- Liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba rugi, yang memiliki 2 (dua) sub-klasifikasi, yaitu liabilitas keuangan yang ditetapkan demikian pada saat pengakuan awal dan liabilitas keuangan yang telah diklasifikasikan dalam kelompok diperdagangkan;
- Liabilitas keuangan lain yang tidak diklasifikasikan sebagai liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi dikategorikan dan diukur dengan biaya perolehan diamortisasi.

Pada saat pengakuan awal, liabilitas keuangan diukur pada nilai wajar ditambah (untuk *item* yang tidak diukur pada nilai wajar melalui laba rugi setelah pengakuan awal) biaya transaksi yang dapat diatribusikan secara langsung atas perolehan penerbitan liabilitas keuangan. Pengukuran liabilitas keuangan setelah pengakuan awal tergantung pada klasifikasi liabilitas keuangan tersebut.

Biaya transaksi hanya meliputi biaya-biaya yang dapat diatribusikan secara langsung untuk penerbitan suatu liabilitas keuangan dan merupakan biaya tambahan yang tidak akan terjadi apabila instrumen keuangan tersebut tidak diperoleh atau diterbitkan.

Liabilitas keuangan, biaya transaksi dikurangkan dari jumlah utang yang diakui pada pengakuan awal liabilitas. Biaya transaksi tersebut diamortisasi selama umur instrumen berdasarkan metode suku bunga efektif dan dicatat sebagai bagian dari beban bunga.

Liabilitas keuangan dihentikan pengakuannya jika liabilitas yang ditetapkan dalam kontrak dilepaskan, dibatalkan, atau kadaluarsa.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(ii) Financial liabilities

Financial liabilities are classified into the following categories at initial recognition:

- *Financial liabilities at fair value through profit or loss, which has 2 (two) sub-classifications, i.e., those designed as such upon initial recognition and those classified as held for trading;*
- *Other financial liabilities that are not classified as financial liabilities at fair value through profit or loss are categorized and measured at amortized cost.*

A financial liability is initially measured at fair value plus (for an item not subsequently measured at fair value through profit or loss) transaction costs that are directly attributable to financial liabilities issuance. The subsequent measurement of financial liabilities depends on their classification.

Transaction costs include only those costs that are directly attributable to the issuance of a financial liability and are incremental costs that would not have been incurred if the financial instruments had not been acquired or issued.

Financial liabilities, transaction costs are deducted from the amount of debt initially recognised. Such transactions costs are amortised over the terms of the instruments based on the effective interest rate method and are recorded as part of interest expense.

Financial liabilities are derecognised when the obligation under the liability is discharged, cancelled, or has expired.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(ii) Liabilitas keuangan (lanjutan)

Jika suatu liabilitas keuangan yang ada digantikan dengan yang lain oleh pemberi pinjaman yang sama pada keadaan yang secara substansial berbeda, atau berdasarkan suatu liabilitas yang ada yang secara substansial telah diubah, maka pertukaran atau modifikasi tersebut diperlakukan sebagai penghentian pengakuan liabilitas awal dan pengakuan liabilitas baru, dan perbedaan nilai tercatat masing-masing diakui dalam laporan laba rugi dan penghasilan komprehensif lain.

(iii) Kontrak modifikasi

Penilaian apakah suatu aset keuangan telah dimodifikasi baik secara substansial maupun tidak substansial dilakukan oleh unit bisnis yang berwenang melakukan modifikasi atau restrukturisasi aset keuangan pada saat unit bisnis tersebut melakukan tindakan modifikasi atau restrukturisasi atas suatu aset keuangan.

Modifikasi aset keuangan dianggap substansial dan Bank akan berhenti mengakui aset keuangan awal ketika:

(a) aset keuangan (atau bagiannya) berakhir, yaitu jika debitur secara hukum dibebaskan dari tanggung jawab utama atas aset tersebut (atau bagiannya), baik melalui proses hukum maupun oleh kreditur pembuatan kontrak kredit baru (sebagai contoh, opsi *equity conversion*); atau
(b) terdapat konversi mata uang.

Bank kemudian akan mengukur aset keuangan yang telah dimodifikasi baik secara substansial maupun tidak substansial dengan cara berikut:

(a) Modifikasi Aset Keuangan yang Substansial

1) Saat arus kas kontraktual atas aset keuangan direnegosiasi atau dimodifikasi (antara lain ketika kredit direstrukturisasi) dimana renegosiasi atau modifikasi tersebut menghasilkan penghentian pengakuan aset keuangan, Bank akan mencatat aset keuangan tersebut sebagai aset keuangan baru/ modifikasian pada tanggal modifikasi/ negosiasi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(ii) Financial liabilities (continued)

Where an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as derecognition of the original liability and the recognition of a new liability, and the difference in the respective carrying amounts is recognised in the profit or loss and other comprehensive income.

(iii) Contract modification

An assessment of whether a financial asset has been modified substantially or not substantially is carried out by a business unit whose authorized to modify or restructure financial assets, when the business unit performs modification or restructure of a financial asset.

Modifications to financial assets are considered substantial and the Bank will cease to recognize the original financial assets when:

(a) the financial asset (or portion thereof) expires, that is, if the debtor is legally released from primary responsibility for the asset (or any portion thereof), either by legal process or by the creditor entering into a new credit contract (for example, the equity conversion option); or
(b) there is a currency conversion.

The Bank will measure the substantially and not substantially modified financial assets as follows:

(a) Substantial Modification of Financial Assets

1) When the contractual cashflow on a financial asset is renegotiated or modified (including when a credit is restructured) and the renegotiation or modification results in derecognition of the financial asset, therefore the Bank will record the financial asset as a new / modified financial asset on the modification/ negotiation date.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(iii) Kontrak Modifikasi (lanjutan)

(a) Modifikasi Aset Keuangan yang Substansial (lanjutan)

2) Selisih jumlah tercatat bruto aset keuangan awal dengan nilai wajar aset modifikasian diakui di laba rugi.

3) Pendapatan atau biaya transaksi yang terjadi sehubungan dengan kejadian modifikasi diakui sebagai bagian dari keuntungan atau kerugian atas modifikasi tersebut.

4) Selanjutnya, Bank melakukan penilaian apakah aset keuangan baru/modifikasian merupakan aset yang berasal dari aset keuangan memburuk.

5) Pengakuan pendapatan bunga atas aset yang berasal dari aset keuangan memburuk ditentukan berdasarkan suku bunga efektif yang telah disesuaikan dengan risiko kredit (*risk-adjusted effective interest rate*) untuk mendiskontokan arus kas aset keuangan yang telah dimodifikasi.

(b) Modifikasi Aset Keuangan yang Tidak Substantial

1. Saat Bank melakukan renegosiasi atau modifikasi arus kas kontraktual atas aset keuangan (antara lain ketika kredit direstrukturisasi) yang tidak memenuhi kriteria modifikasi aset keuangan yang substansial di atas, maka renegosiasi atau modifikasi tersebut tidak menghasilkan penghentian pengakuan aset keuangan.

2. Jumlah tercatat bruto aset keuangan dihitung sebesar nilai kini (*net present value*) dari arus kas kontraktual yang telah dimodifikasi atau direnegosiasi yang didiskontokan menggunakan suku bunga efektif awal.

3. Bank kemudian mengakui keuntungan atau kerugian dari modifikasi (yaitu sebesar perubahan jumlah tercatat bruto aset keuangan) dalam laporan laba rugi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(iii) Contract Modification (continued)

(a) Substantial Modification of Financial Assets (continued)

2) The difference between the gross amount of the initial financial assets and the fair value of the modified assets recorded as profit or loss.

3) Transaction income or costs incurred in connection with a modification event recognized as part of gain or loss on the modification.

4) Next, Bank assess whether new/modified financial assets are assets originating from impaired financial assets.

5) Recognition of interest income on assets originating from financial assets is calculated based on an effective interest rate adjusted for credit risk (risk-adjusted effective interest rate) to discount the cash flows of modified financial assets.

(b) Non-Substantial Modification of Financial Assets

1. When the Bank renegotiates or modifies contractual cash flows of financial assets (including when loans are restructured) that do not meet the criteria for substantial modification of financial assets above, the renegotiation or modification does not result in derecognition of the financial assets.

2. The gross carrying amount of financial assets is computed at the net present value of modified or renegotiated contractual cash flows, discounted at the original effective interest rate.

3. The Bank then recognizes the gain or loss from the modification (i.e the change in the gross carrying amount of the financial asset) in the profit or loss.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(iii) Kontrak Modifikasi (lanjutan)

(b) Modifikasi Aset Keuangan yang Tidak Substantial (lanjutan)

4. Pendapatan atau biaya transaksi yang terjadi sehubungan dengan kejadian modifikasi diakui sebagai penyesuaian terhadap jumlah tercatat aset keuangan yang telah dimodifikasi dan diamortisasi selama sisa jangka waktu aset keuangan modifikasian tersebut.

(iv) Penentuan nilai wajar

Nilai wajar adalah harga yang akan diterima untuk menjual suatu aset atau harga yang akan dibayar untuk mengalihkan suatu liabilitas dalam transaksi teratur (*orderly transaction*) antara pelaku pasar (*market participants*) pada tanggal pengukuran di pasar utama atau, jika tidak terdapat pasar utama, di pasar yang paling menguntungkan dimana Bank memiliki akses pada tanggal tersebut. Nilai wajar liabilitas mencerminkan risiko wanprestasinya.

Jika tersedia, Bank mengukur nilai wajar instrumen keuangan dengan menggunakan harga kuotasian di pasar aktif untuk instrumen tersebut.

Instrumen keuangan dianggap memiliki kuotasi di pasar aktif jika harga kuotasi tersedia sewaktu-waktu dan dapat diperoleh secara rutin dari bursa, pedagang efek (*dealer*), perantara efek (*broker*), kelompok industri, badan pengawas (*pricing service* atau *regulatory agency*), dan harga tersebut mencerminkan transaksi pasar yang aktual dan rutin dalam suatu transaksi yang wajar. Jika kriteria di atas tidak terpenuhi, maka pasar aktif dinyatakan tidak tersedia. Indikasi-indikasi dari pasar tidak aktif adalah terdapat selisih yang besar antara harga penawaran dan permintaan atau kenaikan signifikan dalam selisih harga penawaran dan permintaan dan hanya terdapat beberapa transaksi terkini.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(iii) Contract Modification (continued)

(b) Non-Substantial Modification of Financial Assets (continued)

4. Transaction income or costs incurred in connection with a modification event are recognized as an adjustment to the carrying amount of the modified financial asset and amortised over the remaining term of the modified financial asset.

(iv) Determination of fair value

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal market or, in its absence, the most advantageous market to which the Bank has access at that date. The fair value of a liability reflects its non-performance risk.

When available, the Bank measures the fair value of a financial instrument using the quoted price in an active market for that instrument.

A financial instrument is regarded as quoted in an active market if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. If the above criteria are not met, the market is regarded as being inactive. Indications that a market is inactive are when there is a wide bid-offer spread or significant increase in the bid-offer spread or there are few recent transactions.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(iv) Penentuan nilai wajar (lanjutan)

Bukti terbaik atas nilai wajar instrumen keuangan pada saat pengakuan awal adalah harga transaksi, yaitu nilai wajar dari pembayaran yang diberikan atau diterima. Jika Bank menetapkan bahwa nilai wajar pada pengakuan awal berbeda dengan harga transaksi dan nilai wajar tidak dapat dibuktikan dengan harga kuotasian di pasar aktif untuk aset atau liabilitas yang sejenis atau berdasarkan teknik penilaian yang hanya menggunakan data dari pasar yang dapat diobservasi, maka nilai wajar instrumen keuangan pada saat pengakuan awal disesuaikan untuk menangguhkan perbedaan antara nilai wajar pada saat pengakuan awal dan harga transaksi. Setelah pengakuan awal, perbedaan tersebut diamortisasi dan diakui dalam laba rugi sepanjang umur dari instrumen tersebut.

Untuk instrumen keuangan yang tidak mempunyai harga pasar, estimasi atas nilai wajar ditetapkan dengan mengacu pada nilai wajar instrumen lain yang substansinya sama atau dihitung berdasarkan arus kas yang diharapkan terhadap aset bersih efek-efek tersebut. Untuk penyertaan saham yang nilai wajarnya tidak tersedia, estimasi atas nilai wajar dinyatakan sebesar biaya perolehan.

Nilai wajar untuk semua instrumen keuangan lainnya ditentukan dengan menggunakan teknik penilaian. Dengan teknik ini, nilai wajar merupakan suatu estimasi yang dihasilkan dari data yang dapat diobservasi dari instrumen keuangan yang sama, menggunakan model-model untuk mendapatkan estimasi nilai kini dari arus kas masa depan yang diharapkan atau teknik penilaian lainnya menggunakan input (sebagai contoh nilai tukar mata uang asing, volatilitas, dan *counterparty spreads*) yang tersedia pada tanggal laporan posisi keuangan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(iv) Determination of fair value (continued)

The best evidence of the fair value of a financial instrument at initial recognition is normally the transaction price, i.e., the fair value of the consideration given or received. If the Bank determines that the fair value at initial recognition differs from the transaction price and the fair value is evidenced neither by a quoted price in an active market for an identical asset or liability nor based on a valuation technique that uses only data from observable markets, then the financial instrument is initially measured at fair value, adjusted to defer the difference between the fair value at initial recognition and the transaction price. Subsequently, that difference is amortised and recognised in profit or loss on over the life of the instrument.

For financial instruments with no quoted market price, a reasonable estimate of the fair value is determined by reference to the current market value of another instrument which substantially have the same characteristic or calculated based on the expected cash flows of the underlying net asset base of the marketable securities. For the investment in shares do not have readily determinable fair values, the estimated fair value recognised as at acquisition cost.

For all other financial instruments, fair value is determined using valuation techniques. In these techniques, fair values are estimated from observable data in respect of similar financial instruments, using models to estimate the present value of expected future cash flows or other valuation techniques, using inputs (for example, foreign exchange rates, volatilities and counterparty spreads) existing at the dates of the statement of financial position.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(v) Penentuan biaya perolehan diamortisasi

Biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan adalah jumlah aset atau liabilitas keuangan yang diukur pada saat pengakuan awal, dikurangi pembayaran pokok, ditambah atau dikurangi dengan amortisasi kumulatif dengan menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai awal dan nilai jatuh temponya dan dikurangi cadangan kerugian penurunan nilai.

Kerugian penurunan nilai dilaporkan sebagai pengurang dari nilai tercatat dari aset keuangan dalam kelompok biaya perolehan diamortisasi, dan diakui di dalam laporan laba rugi sebagai "Kerugian penurunan nilai aset keuangan".

Tingkat suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi arus kas di masa datang selama perkiraan umur dari aset keuangan atau liabilitas keuangan (atau jika lebih tepat, digunakan periode yang lebih singkat) untuk memperoleh nilai tercatat bersih pada saat pengakuan awal. Pada saat menghitung tingkat suku bunga efektif, Bank mengestimasi arus kas di masa datang dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, namun tidak mempertimbangkan kerugian kredit di masa mendatang.

Perhitungan suku bunga efektif mencakup biaya transaksi dan seluruh imbalan/provisi dan bentuk lain yang dibayarkan atau diterima yang merupakan bagian tak terpisahkan dari suku bunga efektif.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(v) Determination of amortised cost

The amortised cost of a financial asset or financial liability is the amount at which the financial asset or liability is measured at initial recognition, less principal repayments, plus or less the cumulative amortisation using the effective interest method of any difference between the initial amount recognised and the maturity amount and minus any allowance for impairment losses.

The impairment loss is reported as a deduction from the carrying value of the financial assets classified as amortised cost and recognised in the statement of profit or loss as "Impairment losses on financial assets".

The effective interest rate is the rate that exactly discounts the estimated future cash flows through the expected life of the financial asset or financial liability (or, where appropriate, a shorter period) to the net carrying amount at initial recognition. When calculating the effective interest rate, the Bank estimates future cash flows considering all contractual terms of the financial instrument, but does not consider any future credit losses.

The calculation of the effective interest rate includes transaction costs and all fees and provisions paid or received that are an integral part of the effective interest rate.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(vi) Penghentian pengakuan

Dalam transaksi dimana Bank secara substansial tidak memiliki atau tidak mentransfer seluruh risiko dan manfaat atas kepemilikan aset keuangan, Bank menghentikan pengakuan aset tersebut jika Bank tidak lagi memiliki pengendalian atas aset tersebut. Hak dan kewajiban yang masih dimiliki dalam transfer tersebut diakui secara terpisah sebagai aset atau liabilitas. Dalam transfer dimana pengendalian atas aset masih dimiliki, Bank tetap mengakui aset yang ditransfer tersebut sebesar keterlibatan berkelanjutan, dimana tingkat keberlanjutan Bank dalam aset yang ditransfer adalah sebesar perubahan nilai aset yang ditransfer.

Bank menghapusbukukan aset keuangan dan cadangan kerugian penurunan nilai terkait, pada saat Bank menentukan bahwa aset keuangan tersebut tidak dapat ditagih seluruhnya. Keputusan ini diambil setelah mempertimbangkan informasi seperti telah terjadinya perubahan signifikan pada posisi keuangan debitur/penerbit aset keuangan sehingga debitur/penerbit aset keuangan tidak lagi dapat melunasi kewajibannya, atau hasil penjualan agunan tidak akan cukup untuk melunasi seluruh eksposur pinjaman yang diberikan.

e. Saling hapus

Aset keuangan dan liabilitas keuangan disalinghapuskan dan nilai bersihnya dilaporkan pada laporan posisi keuangan jika, dan hanya jika Bank memiliki hak yang berkekuatan hukum untuk melakukan saling hapus atas jumlah yang telah diakui tersebut dan adanya maksud untuk menyelesaikan liabilitas secara bersamaan.

Hak saling hapus tidak kontinjen atas peristiwa di masa depan dan dapat dipaksakan secara hukum di dalam situasi bisnis yang normal, dan dalam peristiwa gagal bayar atau kebangkrutan dari Bank atau pihak lawan.

Pendapatan dan beban disajikan dalam jumlah bersih hanya jika diperkenankan oleh standar akuntansi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(vi) Derecognition

In transactions in which the Bank neither retains nor transfers substantially all the risks and rewards of ownership of a financial asset, the Bank derecognises the asset if it does not retain control over the asset. The rights and obligations retained in the transfer are recognised separately as assets and liabilities as appropriate. In transfers in which control over the asset is retained, the Bank continues to recognise the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset.

The Bank write off a financial asset and any related allowance for impairment losses, when the Bank determines that the financial asset is completely uncollectible. This determination is reached after considering information such as the occurrence of significant changes in the financial position of debtor/financial asset's issuer such that the debtor/financial asset's issuer can no longer pay the obligation, or that proceeds from collateral will not be sufficient to pay back the entire exposure.

e. Offsetting

Financial assets and liabilities are offset and the net amount is reported in the statements of financial position if only the Bank has a legal right to offset the recognised amounts and there is an intention to settle on net basis, or realise the asset and settle the liability simultaneously.

The legally enforceable right must not be contingent on future events and must be enforceable in the normal course of business and in the event of default, insolvency or bankruptcy of the Bank or the counterparty.

Income and expenses are presented on a net basis only when permitted by the accounting standards.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

f. Klasifikasi dan Reklasifikasi instrumen keuangan

Klasifikasi aset dan liabilitas keuangan

Bank mengklasifikasikan instrumen keuangan ke dalam klasifikasi tertentu yang mencerminkan sifat dari informasi dan mempertimbangkan karakteristik dari instrumen keuangan tersebut. Klasifikasi ini dapat dilihat pada tabel berikut:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

f. Classification and reclassification of financial instruments

Classification of financial assets and liabilities

The Bank classifies the financial instruments into classes that reflects the nature of information and take into account the characteristic of those financial instruments. The classification can be seen in the table below:

Kategori yang didefinisikan oleh PSAK 71/ ***Category as defined by SFAS 71***		**Golongan (ditentukan oleh Bank)/** ***Classes (as determined by the Bank)***
Aset keuangan/ *Financial assets*	Biaya perolehan diamortisasi/*Amortised cost*	Kas/*Cash*
		Giro pada Bank Indonesia/*Current accounts with Bank Indonesia*
		Giro pada bank lain/*Current accounts with other banks*
		Penempatan pada Bank Indonesia dan bank lain/ *Placements with Bank Indonesia and other banks*
		Efek-efek/*Marketable securities*
		Tagihan akseptasi/*Acceptance receivables*
		Pinjaman yang diberikan, pembiayaan dan piutang syariah/ *Loans, sharia financing and receivables*
		Efek-efek yang dibeli dengan janji dijual kembali/*Securities purchased under resale agreements*
		Pendapatan bunga dan syariah yang masih akan diterima/*Interest and sharia income receivables*
		Aset lain-lain/*Other assets*
	Aset keuangan yang diukur pada nilai wajar melalui laba rugi/*Financial assets measured at fair value through profit or loss*	Efek-efek/*Marketable securities*
		Penyertaan saham/*Investments in shares*
	Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain/*Financial assets measured at fair value through other comprehensive income*	Efek-efek/*Marketable securities*
		Penyertaan saham/*Investments in shares*
Liabilitas keuangan/ *Financial liabilities*	Liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi/*Financial liabilities at amortised cost*	Simpanan nasabah/*Deposits from customers*
		Simpanan dari bank lain/*Deposits from other banks*
		Efek-efek yang dijual dengan janji dibeli kembali/*Securities sold under repurchase agreement*
		Efek-efek yang diterbitkan/*Securities issued*
		Utang akseptasi/*Acceptance payables*
		Akrual dan liabilitas lain-lain/*Accruals and other liabilities*
Komitmen dan kontinjensi/ *Commitment and contingency*	Fasilitas pinjaman yang belum digunakan/*Unused loan facilities*	
	Garansi yang diterbitkan/*Guarantees issued*	

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

f. Klasifikasi dan Reklasifikasi instrumen keuangan (lanjutan)

Reklasifikasi aset keuangan

Bank diperkenankan untuk melakukan reklasifikasi atas aset keuangan yang dimiliki jika Bank mengubah model bisnis untuk pengelolaan aset keuangan.

Perubahan model bisnis sifatnya harus berdampak secara signifikan terhadap kegiatan operasional Bank seperti memperoleh, melepaskan, atau mengakhiri suatu lini bisnis. Selain itu, Bank perlu membuktikan adanya perubahan tersebut kepada pihak eksternal.

Bank akan mereklasifikasi seluruh aset keuangan yang terkena dampak dari perubahan model bisnis. Perubahan tujuan model bisnis Bank harus berdampak sebelum tanggal reklasifikasi.

Yang bukan merupakan perubahan model bisnis adalah:

a. perubahan intensi berkaitan dengan aset keuangan tertentu (bahkan dalam situasi perubahan signifikan dalam kondisi pasar);

b. hilangnya sementara pasar tertentu untuk aset keuangan; dan
c. pengalihan aset keuangan antara bagian dari Bank dengan model bisnis berbeda.

Dampak Reklasifikasi Aset Keuangan

Dampak reklasifikasi aset keuangan pada laba rugi atau ekuitas dan pengukuran awalnya adalah sebagai berikut:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

f. Classification and reclassification of financial instruments (continued)

Reclassification of financial assets

The Bank can reclassify its all of its financial assets when and only, its business model for managing those financial assets changes.

The characteristic of business model changes must significantly impact to the Bank operational activities such as collecting, disposing or terminating a business line. In addition, the Bank has to prove the changes to external parties.

The Bank will reclassify all financial assets impacted by business model changes. Changes of the objective of the Bank's business model must be impacted before reclassification date.

The following lists are not changes in business model:

a. changes in intention in relation with certain financial asset (even in situations of significant changes in market conditions);
b. temporary loss of certain markets for financial assets; and
c. transfer of financial asset between Bank with different business model.

Impact of Reclassificaton of Financial Assets

The impact of reclassification of financial asset on profit or loss or equity and its initial measurement is as follows:

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

f. Klasifikasi dan Reklasifikasi Instrumen keuangan (lanjutan)

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

f. Classification and Reclassification of Financial Instruments (continued)

Reklasifikasi/ *Reclassification*		**Dampak Terhadap Laba Rugi/ *Impact on profit or loss***	**Dampak Terhadap Ekuitas/ *Impact on equity***	**Nilai Tercatat Awal Setelah Reklasifikasi/ *Initial Carrying Value After Reclassification***
Dari/ *From*	**Ke/ *To***			
FVTPL	*Amortised Cost*	-	-	1. Nilai wajar pada tanggal reklasifikasi menjadi jumlah tercatat bruto yang baru/ *Fair value at the reclassification date becomes its new gross carrying amount.* 2. Suku bunga efektif ditentukan pada dasar nilai wajar aset pada tanggal reklasifikasi/ *Effective interest rate is determined at the fair value of the asset at reclassification date.*
	FVOCI	-	-	1. Aset keuangan tetap diukur pada nilai wajarnya/ *Financial assets is measured at fair value.* 2. Suku bunga efektif ditentukan pada dasar nilai wajar aset pada tanggal reklasifikasi/ *Effective interest rate is determined at the fair value of the asset at reclassification date.*
Amortised Cost	FVTPL	Selisih antara nilai tercatat sebelum reklasifikasi dan nilai wajar setelah reklasifikasi/ *Difference in carrying amount before reclassification and fair value after reclassification*	-	Nilai wajarnya diukur pada tanggal reklasifikasi/ *Fair value is measured at reclassification date.*
	FVOCI	-	Selisih antara nilai tercatat sebelum reklasifikasi dan nilai wajar setelah reklasifikasi/ *Difference in carrying amount before reclassification and fair value after reclassification*	1. Nilai wajarnya diukur pada tanggal reklasifikasi/ *Fair value is measured at reclassification date.* 2. Suku bunga efektif dan pengukuran kerugian kredit ekspektasian tidak perlu disesuaikan/ *Effective interest rate and expected credit loss is not adjusted.*
FVOCI	*Amortised Cost*	-	Keuntungan atau kerugian kumulatif dihapus dari ekuitas dan disesuaikan terhadap nilai wajar/ *Cumulative gain or loss on OCI is adjusted against the fair value of the financial asset*	1. Nilai wajar pada tanggal reklasifikasi menjadi jumlah tercatat bruto yang baru ditambah atau dikurangi keuntungan atau kerugian kumulatif sebelumnya/ *Fair value at the reclassification date becomes its new gross carrying amount by added or deducted the previous cumulative gain or loss.* 2. Suku bunga efektif dan pengukuran kerugian kredit ekspektasian tidak perlu disesuaikan/ *Effective interest rate and expected credit loss is not adjusted.*
	FVOCI	Keuntungan atau kerugian kumulatif direklasifikasi dari ekuitas menjadi laba rugi/ *Cumulative gain or loss on OCI is reclassified to profit or loss*		Aset keuangan tetap diukur pada nilai wajarnya/ *Financial assets is measured at fair value*

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan

Bank menilai dengan dasar perkiraan masa yang akan datang kerugian kredit ekspektasian (*Expected Credit Loss*/"ECL") terkait dengan instrumen aset keuangan yang dicatat pada biaya perolehan diamortisasi dan nilai wajar melalui penghasilan komprehensif lain. Metodologi penurunan nilai yang ditampilkan tergantung kepada apakah tidak terjadi peningkatan risiko kredit yang signifikan untuk aset keuangan yang diukur pada biaya perolehan diamortisasi dan diukur pada nilai wajar melalui penghasilan komprehensif lain (FVOCI). Jika pada tanggal pelaporan, risiko kredit atas aset keuangan tidak meningkat secara signifikan sejak pengakuan awal, maka Bank akan mengukur penyisihan kerugian untuk aset keuangan tersebut sejumlah ECL 12 bulan. Jika risiko kredit atas aset keuangan telah meningkat secara signifikan dari pengakuan awal, maka Bank akan menyajikan penyisihan kerugian sejumlah ECL *lifetime*.

ECL 12 bulan dan ECL *lifetime*

ECL 12 bulan adalah bagian dari kerugian kredit ekspektasian sepanjang umurnya yang merepresentasikan ECL yang timbul dari peristiwa gagal bayar aset keuangan yang mungkin terjadi dalam 12 bulan setelah tanggal pelaporan (atau periode yang lebih pendek jika umur aset keuangan yang diharapkan kurang dari 12 bulan). ECL 12 bulan dibobot oleh probabilitas terjadinya *default* dimaksud.

ECL *lifetime* adalah kerugian yang diakibatkan dari semua kejadian default yang mungkin terjadi selama perkiraan waktu umur hidup aset keuangan.

Staging Criteria

Aset keuangan harus dialokasikan ke salah satu dari tiga tahap penurunan nilai (*stage* 1, *stage* 2, *stage* 3) dengan menentukan apakah terjadi peningkatan risiko kredit yang signifikan atas aset keuangan sejak pengakuan awal atau apakah fasilitas tersebut gagal bayar pada setiap tanggal pelaporan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets

The Bank assesses on a forward-looking basis the expected credit loss associated with its financial assets instruments carried at amortised cost and fair value at other comprehensive income. The impairment methodology applied depends on whether there has been a significant increase in credit risk to financial asset measured at amortised cost and at fair value through other comprehensive income (FVOCI). If at the reporting date, credit risk on financial asset has not increased significantly since initial recognition, the Bank shall measure the allowance for losses for that financial asset at the amount of 12 (twelve) months expected losses. If the credit risk on that financial asset has increased significantly since initial recognition, the Bank shall measure the allowance for losses at the amount of expected credit losses over its lifetime.

12-month ECL and Lifetime ECL

12-month ECL is the portion of ECL that result from default events that are possible within the 12-months after reporting date (or the shorter period if expected life of financial asset is less than 12 months). 12-month ECL is weighted by probability of default.

Lifetime ECL is the ECL that result from all possible default events over the expected life of financial asset.

Staging Criteria

Financial asset must be allocated to one of three stages of impairment (stage 1, stage 2, stage 3) by determining whether there is a significant increase in credit risk on the financial asset since initial recognition or whether the facility has defaulted on each reporting date.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan (lanjutan)

Stage 1: ECL diakui pada saat pengakuan awal instrumen keuangan dan merepresentasikan kekurangan kas sepanjang umur aset yang timbul dari kemungkinan gagal bayar di masa yang akan datang dalam kurun waktu dua belas bulan sejak tanggal pelaporan. ECL terus ditentukan oleh dasar ini sampai timbul peningkatan risiko kredit yang signifikan pada instrumen tersebut atau instrumen tersebut telah mengalami penurunan nilai kredit. Jika suatu instrumen tidak lagi dianggap menunjukkan peningkatan risiko kredit yang signifikan, maka ECL dihitung kembali berdasarkan basis dua belas bulan.

Stage 2: mencakup aset keuangan yang mengalami peningkatan signifikan atas risiko kredit ("SICR") sejak pengakuan awal (kecuali jika memiliki risiko kredit rendah pada tanggal pelaporan), namun tidak memiliki bukti penurunan nilai yang objektif. Untuk aset ini, ECL *lifetime* dihitung. ECL *lifetime* adalah kerugian pinjaman yang diharapkan yang dihasilkan dari semua kejadian *default* yang mungkin terjadi selama perkiraan umur dari aset keuangan.

Bank menggunakan berbagai pengukuran kualitatif dan kuantitatif dalam menilai SICR seperti berikut:

Pinjaman yang diberikan

a. Kriteria kuantitatif
Akun-akun dengan 30 hari tunggakan ("DPD") dianggap telah mengalami peningkatan risiko kredit yang signifikan.

b. Kriteria kualitatif
Debitur dengan DPD kurang dari 30 hari yang telah direstrukturisasi (kecuali debitur restrukturisasi akibat dampak pandemi COVID-19) dianggap memiliki kenaikan signifikan atas risiko kredit.

Stage 3: Aset hanya akan dianggap mengalami penurunan nilai dan kerugian kredit ekspektasian sepanjang umurnya diakui, jika terdapat bukti objektif penurunan nilai yang dapat diobservasi. Faktor-faktor yang diobservasi ini serupa dengan indikator bukti

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets (continued)

Stage 1: ECL are recognised at the time of initial recognition of a financial instrument and represent the lifetime cash shortfalls arising from possible default events up to twelve months into the future from the reporting date. ECL continue to be determined on this basis until there is either a significant increase in the credit risk of an instrument or the instrument becomes credit-impaired. If an instrument is no longer considered to exhibit a significant increase in credit risk, ECL will revert to being determined on a 12-month basis.

Stage 2: includes financial assets that experience a significant increase in credit risk ("SICR") since initial recognition (unless having low credit risk at the reporting date), but do not have objective evidence of impairment. For these assets, Lifetime ECL will be calculated. Lifetime ECL are the ECL that results from all possible default events over the expected life of financial asset.

The Bank uses a number of qualitative and quantitative measures in assessing SICR as follows:

Loans

a. Quantitative criteria
Accounts that are 30 days past due ("DPD") are considered to have experienced a significant increase in credit risk.

b. Qualitative criteria
Debtors with DPD less than 30 days which have been restructured (except for restructured debtors as a result of the COVID-19 pandemic) which is considered to have a significant increase in credit risk.

Stage 3: An asset is only considered credit impaired and lifetime expected credit losses recognised, if there is observed objective evidence of impairment. These factors are similar to the indicators of objective evidence of impairment under SFAS 71, this includes,

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan (lanjutan)

objektif penurunan nilai pada PSAK 71, termasuk antara lain aset gagal bayar atau mengalami kesulitan keuangan yang signifikan atau mengalami *forbearance* atas kredit yang mengalami penurunan nilai (disebut sebagai 'aset *Stage* 3'). Pengukuran kerugian kredit ekspektasian di seluruh tahapan aset diperlukan untuk mencerminkan jumlah yang tidak bias dan rata-rata probabilitas tertimbang yang ditentukan dengan mengevaluasi serangkaian kemungkinan yang dapat terjadi menggunakan informasi yang wajar dan dapat didukung dengan peristiwa di masa lampau, kondisi saat ini dan proyeksi terkait dengan kondisi ekonomis di masa depan.

Aset keuangan yang mengalami penurunan nilai (atau gagal bayar) merupakan aset yang setidaknya telah memiliki tunggakan lebih dari 90 hari atas pokok dan/atau bunga atau memiliki peringkat kredit tertentu (*default*). Aset keuangan juga dianggap mengalami penurunan nilai kredit dimana debitur kemungkinan besar tidak akan membayar dengan terjadinya satu atau lebih kejadian yang teramati yang memiliki dampak menurunkan jumlah estimasi arus kas masa depan dari aset keuangan tersebut. Cadangan kerugian penurunan nilai terhadap aset keuangan yang mengalami penurunan nilai ditentukan berdasarkan penilaian terhadap arus kas yang dapat dipulihkan berdasarkan sejumlah skenario, termasuk realisasi jaminan yang dimiliki jika memungkinkan. ECL akan mencerminkan rata-rata tertimbang dari skenario berdasarkan probabilitas dari skenario yang relevan untuk terjadi. Cadangan kerugian penurunan nilai merupakan selisih antara nilai sekarang dari arus kas yang diperkirakan akan dipulihkan, didiskontokan pada suku bunga efektif awal, dan nilai tercatat bruto instrumen sebelum penurunan nilai kredit.

Periode yang diperhitungkan ketika mengukur kerugian kredit ekspektasian adalah periode kontrak aset keuangan. Umur ekspektasian dapat dipengaruhi oleh pembayaran dimuka dan periode kontrak maksimum melalui opsi perpanjangan kontrak. Untuk portofolio *revolving* tertentu, umur ekspektasian dinilai sepanjang periode dimana Bank terekspos dengan risiko kredit (berdasarkan durasi waktu yang dibutuhkan untuk fasilitas kredit ditarik).

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets (continued)

amongst other factors, assets in default or experiencing significant financial difficulty, or experiencing forbearance on impaired credit (mentioned as 'Stage 3 asset'). The measurement of expected credit losses across all stages is required to reflect an unbiased and probability weighted amount that is determined by evaluating a range of reasonably possible outcomes using reasonable and supportable information about past events, current conditions and forecasts of future economic conditions.

Financial assets that are credit impaired (or in default) represent those that are at least 90 days past due in respect of principal and/or interest or has certain credit grades (default). Financial assets are also considered to be credit impaired where the debtors are unlikely to pay on the occurrence of one or more observable events that have a detrimental impact on the estimated future cash flows of the financial asset. Loss provisions against credit impaired financial assets are determined based on an assessment of the recoverable cash flows under a range of scenarios, including the realisation of any collateral held where appropriate. The ECL will reflect weighted average of the scenarios based on the probability of the relevant scenario to occur. The loss provisions held represent the difference between the present value of the cash flows expected to be recovered, discounted at the instrument's original effective interest rate, and the gross carrying value of the instrument prior to any credit impairment.

The period considered when measuring expected credit loss is the contractual term of the financial asset. The expected life may be impacted by prepayments and the maximum contractual term by extension options. For certain revolving portfolios, the expected life is assessed over the period that the Bank is exposed to credit risk (which is based on the length of time it takes for credit facilities to be withdrawn).

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan (lanjutan)

Untuk aset yang diukur pada biaya perolehan diamortisasi, saldo di neraca mencerminkan aset bruto dikurangi kerugian kredit ekspektasian. Untuk instrumen utang dalam kategori FVOCI, saldo di neraca mencerminkan nilai wajar dari instrumen dikurangi dengan cadangan kerugian kredit ekspektasian.

Untuk menentukan kerugian kredit ekspektasian komponen-komponen ini akan diperhitungkan secara bersama-sama dan didiskontokan ke tanggal laporan keuangan menggunakan diskonto berdasarkan suku bunga efektif.

PSAK 71 mensyaratkan penyertaan informasi tentang kejadian masa lalu, kondisi saat ini dan perkiraan kondisi ekonomi masa depan. Perkiraan perubahan dalam kerugian pinjaman yang diharapkan harus mencerminkan dan secara langsung konsisten dengan perubahan dalam data terkait yang diobservasi dari periode ke periode. Perhitungan ECL ini membutuhkan estimasi *forward-looking* dari *Probability of Default* (PD), *Loss Given Default* (LGD) dan *Exposure At Default* (EAD).

Untuk komitmen pinjaman dan kontrak jaminan keuangan, tanggal pada saat Bank menjadi pihak dalam suatu komitmen yang tidak dapat dibatalkan merupakan tanggal pengakuan awal untuk keperluan penerapan persyaratan penurunan nilai.

a. *Probability of Default* ("PD")

Probabilitas yang timbul di suatu waktu dimana debitur mengalami gagal bayar, dikalibrasikan sampai dengan periode 12 bulan dari tanggal laporan (*Stage* 1) atau sepanjang umur (*Stage* 2 dan 3) dan digabungkan pada dampak asumsi ekonomi masa depan yang memiliki risiko kredit. PD diestimasikan pada *point in time* dimana hal ini berfluktuasi sejalan dengan siklus ekonomi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets (continued)

For assets measured at amortised cost, the balance sheet amount reflects the gross asset less the expected credit losses. For debt instruments held at FVOCI, the balance sheet amount reflects the instrument's fair value less the expected credit losses.

To determine the expected credit loss, these components are multiplied together and discounted to the balance sheet date using the effective interest rate as the discount rate.

SFAS 71 requires supportable information about past events, current condition and forecasts of future economic conditions. Estimated movement on expected credit losses have to be reflected and directly consistent with changes in observed related data over the period. This ECL calculation needs forward-looking estimation from Probability of Default (PD), Loss Given Default (LGD) and Exposure At Default (EAD).

For loan commitments and financial guarantee contracts, the date when the Bank become a party in a irrevocable commitment is the date of initial recognition for implementation of impairment purposes.

a. Probability of Default ("PD")

The probability at a point in time that a counterparty will default, calibrated over up to 12 months from the reporting date (Stage 1) or over the lifetime of the product (Stage 2 and 3) and incorporating the impact of forward-looking economic assumptions that have an effect on credit risk. PD is estimated at a point in time that means it will fluctuate in line with the economic cycle.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan (lanjutan)

b. *Loss Given Default ("LGD")*

Kerugian yang diperkirakan akan timbul dari debitur yang mengalami gagal bayar dengan menggabungkan dampak dari asumsi ekonomi masa depan yang relevan (jika ada) dimana hal ini mewakili perbedaan antara arus kas kontraktual yang akan jatuh tempo dengan arus kas yang diharapkan untuk diterima. Bank mengestimasikan LGD berdasarkan data historis dari tingkat pemulihan dan memperhitungkan pemulihan yang berasal dari jaminan terhadap aset keuangan dengan mempertimbangkan asumsi ekonomi di masa depan jika relevan.

c. *Exposure at Default ("EAD")*

Perkiraan nilai eksposur neraca pada saat gagal bayar dengan mempertimbangkan bahwa perubahan ekspektasi yang diharapkan selama masa eksposur. Hal ini menggabungkan dampak penarikan fasilitas yang *committed* pembayaran pokok dan bunga, amortisasi dan pembayaran dipercepat, bersama dengan dampak asumsi ekonomi masa depan jika relevan.

h. Penurunan nilai dari aset non-keuangan

Nilai tercatat aset non-keuangan Bank, selain aset pajak tangguhan, dikaji pada setiap tanggal pelaporan untuk menentukan ada tidaknya indikasi penurunan nilai. Untuk tujuan pengujian penurunan nilai, aset yang tidak dapat diuji secara individual dapat digabungkan ke dalam kelompok aset terkecil yang menghasilkan arus kas masuk dari penggunaan berkelanjutan yang sebagian besar independen dari arus kas masuk dari aset lainnya (Unit Penghasil Kas atau "CGU"). Jika terdapat indikasi adanya penurunan nilai tersebut, maka nilai terpulihkan aset diestimasi.

Kerugian penurunan nilai diakui jika nilai tercatat suatu aset atau CGU melebihi estimasi nilai terpulihkannya. Nilai terpulihkan suatu aset adalah nilai yang terbesar antara nilai pakai aset atau CGU dan nilai wajar dikurangi biaya penjualan. Dalam penentuan nilai pakai aset, estimasi arus kas masa depan didiskontokan menggunakan tingkat diskonto sebelum pajak yang menggambarkan penilaian pasar kini atas nilai waktu dari uang dan risiko yang terkait dengan aset yang bersangkutan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets (continued)

b. Loss Given Default ("LGD")

The loss that is expected to arise on default, incorporating the impact of relevant forward looking economic assumptions (if any), which represents the difference between the contractual cash flows due and those that the Bank expects to receive. The Bank estimates LGD based on the historical recovery rates and considers the recovery of any collateral that is integral to the financial assets, taking into account forward looking economic assumptions if relevant.

c. Exposure at Default ("EAD")

The expected balance sheet exposure at the time of default, taking into account that expected change in exposure over the lifetime of the exposure. This incorporates the impact of drawdowns of committed facilities, repayments of principal and interest, amortisation and prepayments, together with the impact of forward looking economic assumptions where relevant.

h. Impairment of non-financial assets

The carrying amount of the Bank's non-financial assets, other than deferred tax assets, are reviewed at each reporting date to determine whether there is any indication of impairment. For the purpose of impairment testing, assets that cannot be tested individually are grouped together into the smallest group of assets that generates cash inflows from continuing use that are largely independent of the cash inflows of other assets (Cash Generating Units or "CGU"). If any such indication exists, then the asset's recoverable amount is estimated.

An impairment loss is recognised if the carrying amount of an asset or CGU exceeds its estimated recoverable amount. The recoverable amount of an asset or CGU is the greater of its value in use and its fair value less cost to sell. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

h. Penurunan nilai dari aset non-keuangan (lanjutan)

Kerugian penurunan nilai atas aset non-keuangan yang diakui pada tahun sebelumnya dikaji pada setiap tanggal pelaporan keuangan untuk menilai apakah terdapat indikasi bahwa rugi penurunan nilai yang telah diakui sebelumnya telah menurun atau tidak ada lagi. Kerugian penurunan nilai, kecuali untuk *goodwill*, dipulihkan jika terdapat perubahan estimasi yang digunakan untuk menentukan nilai terpulihkan. Jumlah kerugian penurunan nilai yang dibalik tidak boleh menyebabkan nilai aset melebihi nilai tercatat bersih setelah penyusutan atau amortisasi, seandainya tidak ada kerugian penurunan nilai yang diakui.

i. Kas dan setara kas

Kas meliputi kas dan kas dalam *khasanah*. Untuk tujuan laporan arus kas, kas dan setara kas mencakup kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, dan Sertifikat Bank Indonesia yang jatuh tempo dalam 3 (tiga) bulan atau kurang sejak tanggal perolehan yang tidak dijaminkan atau dibatasi penggunaannya.

j. Giro pada Bank Indonesia dan bank lain

Giro pada Bank Indonesia dan bank lain diklasifikasikan sebagai aset keuangan yang diukur pada biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas aset keuangan.

Giro pada Bank Indonesia dan bank lain dinyatakan sebesar saldo giro dikurangi dengan cadangan kerugian penurunan nilai.

k. Penempatan pada Bank Indonesia dan bank lain

Penempatan pada Bank Indonesia dan bank lain merupakan penanaman dana dalam bentuk *interbank call money*, Deposito berjangka, Sertifikat deposito, dan Fasilitas Simpanan Bank Indonesia ("FASBI").

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

h. Impairment of non-financial assets (continued)

Impairment losses in respect of non-financial assets recognised in prior year are assessed at each reporting date for any indications that the loss has decreased or no longer exists. An impairment loss, except for goodwill, is reversed if there has been a change in the estimates used to determine the recoverable amount. An impairment loss is reversed only to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortisation, if no impairment loss had been recognised.

i. Cash and cash equivalents

Cash includes cash on hand and cash in vault. For the purpose of the statement of cash flows, cash and cash equivalents include cash, current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks, and Certificates of Bank Indonesia maturing within 3 (three) months or less from the date of acquisition and are not pledged or restricted.

j. Current accounts with Bank Indonesia and other banks

Current accounts with Bank Indonesia and other banks are classified as financial assets measured at amortised cost. Refer to Note 2d for the accounting policy of financial assets.

Current accounts with Bank Indonesia and other banks are stated at the outstanding balance less allowance for impairment losses.

k. Placements with Bank Indonesia and other banks

Placements with Bank Indonesia and other banks consist of interbank call money, Time deposit, Certificate of deposits, and Bank Indonesia Deposit Facility ("FASBI").

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

I. Efek-efek

Efek-efek yang dimiliki terdiri dari Sertifikat Bank Indonesia ("SBI"), Sekuritas Rupiah Bank Indonesia ("SRBI"), Surat Utang Negara, Surat Berharga Syariah Negara, obligasi korporasi, wesel jangka menengah, unit penyertaan reksadana, dan efek-efek pasar uang dan pasar modal lainnya.

Setelah pengakuan awal, efek-efek diukur sesuai dengan klasifikasinya masing-masing, sebagai diukur pada biaya perolehan diamortisasi atau diukur pada nilai wajar melalui pendapatan komprehensif lain ("FVOCI") atau diukur pada nilai wajar melalui laporan laba rugi ("FVTPL").

1. Diukur pada biaya perolehan diamortisasi

Setelah pengakuan awal, investasi diukur pada biasa perolehan diamortisasi dengan menggunakan metode suku bunga efektif.

2. Diukur pada FVOCI

Setelah pengakuan awal, diukur pada nilai wajar dimana keuntungan dan kerugian yang belum direalisasi atas perubahan nilai wajar akan diakui sebagai penghasilan komprehensif lain. Perubahan pada kerugian kredit ekspektasian diakui laba rugi dan diakumulasi pada ekuitas. Pada saat penghentian pengakuan, akumulasi keuntungan atau kerugian nilai wajar bersih, setelah akumulasi cadangan kerugian penurunan nilai, ditransfer ke laba rugi.

3. Diukur pada FVTPL

Seluruh aset keuangan yang tidak diklasifikasikan sebagai diukur dengan biaya perolehan diamortisasi atau FVOCI sebagaimana ketentuan di atas diukur dengan FVTPL. Instrumen keuangan yang dikelompokkan ke dalam kategori ini diakui pada nilai wajarnya pada saat pengakuan awal; biaya transaksi diakui secara langsung ke dalam laporan laba rugi. Keuntungan dan kerugian yang timbul dari perubahan nilai wajar dan penjualan instrumen keuangan diakui di dalam laporan laba rugi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

I. Marketable securities

Marketable securities consist of Certificates of Bank Indonesia ("SBI"), Bank Indonesia Rupiah Securities ("SRBI"), Government Promissory Notes, Government Sharia Bonds, corporate bonds, medium term notes, mutual fund investment units and other money market and capital market securities.

Subsequently accounted for, marketable securities depending on their respective classifications, as either measured at amortised cost or measured at fair value through other comprehensive income ("FVOCI") or measured at fair value through profit or loss ("FVTPL").

1. Measured at amortised cost

Accounted for, investment measured at amortised cost using effective interest rate method.

2. Measured at FVOCI

Accounted for, investment carried at fair value with all unrealised gains and losses arising from changes in fair value recognised in other comprehensive income. Changing in expected credit losses recognised in the profit or loss and are accumulated in equity. On derecognition, the cumulative fair value gains or losses, net of cumulative allowance for impairmen losses, are transferred to the profit or loss.

3. Measured at FVTPL

All financial assets not classified as measured at amortised cost or FVOCI as described above are measured at FVTPL. Financial instruments grouped into this category are recognised at their fair value at initial recognition; transaction costs are recognised directly in the statement of profit or loss. Gains and losses arising from changes in fair value and sale of financial instruments are recognised in the statement of profit or loss.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

m. Pinjaman yang diberikan, pembiayaan dan piutang syariah

Restrukturisasi pinjaman bisa meliputi modifikasi persyaratan pinjaman, konversi pinjaman menjadi saham atau instrumen keuangan lainnya dan/atau kombinasi dari keduanya.

Pinjaman yang direstrukturisasi dan tidak dihentikan pengakuannya disajikan sebesar nilai yang lebih rendah antara nilai tercatat pinjaman pada tanggal restrukturisasi atau proyeksi nilai kini dari penerimaan kas masa depan setelah restrukturisasi. Kerugian akibat selisih antara nilai tercatat pinjaman pada tanggal restrukturisasi dengan nilai tunai penerimaan kas masa depan setelah restrukturisasi diakui sebagai laba/rugi. Setelah restrukturisasi, semua penerimaan kas masa depan yang ditetapkan dalam persyaratan baru dicatat sebagai pengembalian pokok pinjaman yang diberikan dan pendapatan bunga sesuai dengan syarat-syarat restrukturisasi.

Termasuk di dalam pinjaman yang adalah termasuk pembiayaan oleh PT Bank Victoria Syariah, Entitas Anak, berupa pembiayaan dan piutang syariah.

Penjelasan secara ringkas dari masing-masing jenis pembiayaan dan piutang tersebut adalah sebagai berikut:

Pembiayaan *mudharabah* adalah penanaman dana dari pemilik dana (*shahibul maal*) kepada pengelola dana (*mudharib*) untuk melakukan kegiatan usaha tertentu, dengan menggunakan bagi hasil (*profit sharing*) atau metode bagi hasil usaha (*gross profit margin*) antara kedua belah pihak berdasarkan *nisbah* yang telah disepakati sebelumnya. Entitas Anak mengenakan bagi hasil berdasarkan metode margin laba kotor.

Pembiayaan *mudharabah* dinyatakan sebesar saldo pembiayaan dikurangi dengan cadangan kerugian penurunan nilai. Entitas Anak menetapkan cadangan kerugian penurunan nilai sesuai dengan kualitas pembiayaan berdasarkan penelaahan atas masing-masing saldo pembiayaan. Apabila sebagian pembiayaan *mudharabah* hilang sebelum dimulainya usaha karena adanya kerusakan atau sebab lainnya tanpa adanya kelalaian atau kesalahan pihak pengelola dana, maka rugi tersebut mengurangi saldo pembiayaan mudharabah dan diakui sebagai kerugian Entitas Anak. Apabila sebagian pembiayaan *mudharabah* hilang setelah dimulainya usaha tanpa adanya kelalaian atau kesalahan pengelola dana, maka rugi tersebut diperhitungkan pada saat bagi hasil.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

m. Loans, sharia financing and receivables

Loan restructuring may involve a modification of the terms of the loans, conversion of loans into equity or other financial instruments and/or a combination of both.

Restructured loans which are not derecognised, are stated at the lower of carrying value of the loan at the time of restructuring or net present value of the estimate of total future cash receipts after restructuring. Losses arising from any excess of the carrying value of the loan at the time of restructuring over the net present value of the total future cash receipts after restructuring are recognised as profit/loss. Thereafter, all cash receipts under the new terms shall be accounted for as the recovery of principal and interest revenue, in accordance with the restructuring scheme.

Included in loans are financing by PT Bank Victoria Syariah, a Subsidiary, in the form of sharia financing and receivables.

Brief explanation for each type of sharia financing and receivables are as follows:

Mudharabah financing is investment of funds from the owner of funds (shahibul maal) to the fund manager (mudharib) to conduct certain business activity, with profit sharing or gross profit margin method between the two parties based on a mutually agreed predetermined ratio. The Subsidiary uses profit sharing scheme based on gross profit margin method.

Mudharabah financing is stated at the outstanding balance, net of allowance for possible losses. The Subsidiary provides allowance for impairment losses based on the financing quality as determined by a review of each account. In the event that a portion of the mudharabah financing is lost prior to the start of operations due to damage or any other reasons without negligence or error by the fund manager, the loss shall be deducted from mudharabah financing balance and shall be recognised as a loss by the Subsidiary. If part of mudharabah financing is lost after the commencement of business without negligence or fault of the fund manager, such loss is calculated during profit sharing.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

m. Pinjaman yang diberikan, pembiayaan dan piutang syariah (lanjutan)

Kerugian pembiayaan *mudharabah* akibat kelalaian atau kesalahan pengelola dana dibebankan pada pengelola dana dan tidak mengurangi saldo pembiayaan *mudharabah*.

Pembiayaan *musyarakah* adalah akad kerjasama antara dua pihak atau lebih untuk suatu usaha tertentu, dimana masing-masing pihak memberikan kontribusi dana dengan ketentuan bahwa keuntungan dibagi berdasarkan kesepakatan, sedangkan kerugian berdasarkan porsi kontribusi dana. Dana tersebut meliputi kas atau aset non-kas yang diperkenankan oleh syariah. Pembiayaan *musyarakah* dinyatakan sebesar saldo pembiayaan dikurangi dengan cadangan kerugian penurunan nilai. Entitas Anak menetapkan cadangan kerugian penurunan nilai sesuai dengan kualitas pembiayaan berdasarkan penelaahan atas masing-masing saldo pembiayaan.

Piutang *Ijarah* adalah penyediaan dana dalam rangka memindahkan hak guna atau manfaat dari suatu barang atau jasa berdasarkan transaksi sewa, tanpa diikuti dengan pemindahan kepemilikan barang itu sendiri kepada penyewa. *Ijarah muntahiyah bittamlik* adalah penyediaan dana dalam rangka memindahkan hak guna atau manfaat dari suatu barang atau jasa berdasarkan transaksi sewa dengan opsi pemindahan kepemilikan barang kepada penyewa. Piutang pendapatan *ijarah* diakui pada saat jatuh tempo sebesar sewa yang belum diterima dan disajikan sebesar nilai bersih yang dapat direalisasikan, yakni sebesar saldo piutang.

Murabahah adalah akad jual beli barang dengan harga jual sebesar beban perolehan ditambah keuntungan yang disepakati dan penjual harus mengungkapkan beban perolehan barang tersebut kepada pembeli.

Piutang *murabahah* diklasifikasikan sebagai aset keuangan dalam kategori pinjaman yang diberikan dan piutang sesuai PSAK 55.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

m. Loans, sharia financing and receivables (continued)

Loss on mudharabah financing due to negligence or error by the fund manager is charged to the fund manager and not deducted from the balance of mudharabah financing.

Musyarakah financing is an agreement between two or more parties for a particular business, in which each party contributes funds provided that the profits are divided according to the agreement, while losses are based on the portion of fund contributions. The fund consists of cash or non-cash assets allowed by sharia. Musyarakah financing is stated at outstanding balance, net of allowance for impairment losses. The Subsidiary provides allowance for impairment losses based on the financing quality as determined by a review of each account.

Ijarah receivables are the financing on the availability of fund in relation to transferring the right to use and benefit of a goods and service based on rental transaction which was not followed by transfer of the goods ownership to the lessee. Ijarah muntahiyah bittamlik is an agreement on the availability of fund in relation to transferring the use right and benefit of a goods or service based on rental transaction with an option to transfer the ownership title of goods to the lessee. Ijarah receivables are recognised at due date at the amount of its lease income not yet received and presented at its net realisable value, which is the outstanding balance of the receivables.

Murabahah is an agreement of sales transaction for goods in which the selling price is determined based on acquisition cost added with mutually agreed margin and the seller shall disclose the acquisition cost to buyer.

Murabahah receivables are classified as financial assets under category loan and receivables in accordance with SFAS 55.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

n. Efek-efek yang dibeli dengan janji dijual kembali dan efek-efek yang dijual dengan janji dibeli kembali

Efek-efek yang dibeli dengan janji dijual kembali merupakan transaksi dimana Bank membeli aset keuangan dan secara simultan masuk ke dalam perjanjian untuk menjual kembali aset (atau aset yang serupa secara substansial) dengan harga tetap di masa depan. Aset yang mendasari tidak diakui dalam laporan keuangan. Setelah pengakuan awal, efek-efek yang dibeli dengan janji dijual kembali diukur pada biaya perolehan diamortisasi. Selisih antara harga beli dan harga jual kembali diakui sebagai pendapatan bunga dengan menggunakan metode suku bunga efektif.

Efek-efek yang dijual dengan janji dibeli kembali merupakan transaksi dimana Bank menjual aset keuangan dan secara simultan masuk ke dalam perjanjian untuk membeli kembali aset (atau aset yang serupa secara substansial) dengan harga tetap di masa depan.

Efek-efek yang dijual dengan janji untuk dibeli kembali disajikan sebagai liabilitas dalam laporan posisi keuangan sebesar harga beli kembali yang disepakati dikurangi selisih antara harga jual dan harga beli kembali yang disepakati. Selisih antara harga jual dan harga beli kembali yang disepakati tersebut diamortisasi sebagai beban bunga selama jangka waktu sejak efek-efek dijual hingga dibeli kembali.

o. Tagihan dan utang akseptasi

Setelah pengakuan awal, tagihan dan utang akseptasi diukur pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif.

p. Penyertaan saham

(A) Penyertaan saham

Penyertaan saham merupakan investasi jangka panjang pada perusahaan non-publik.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

n. Securities purchased under resale agreements and securities sold under repurchase agreements

Securities purchased under resale agreements are transactions in which the Bank purchases a financial asset and simultaneously enters into an agreement to resell the asset (or substantially similar asset) at a fixed price on a future date. The underlying asset is not recognised in the financial statements. Subsequent to initial recognition, securities purchased under resale agreements are measured at amortised cost. The difference between purchase and resale price is recognised as interest income using the effective interest method.

Securities sold under repurchase agreements are transactions in which the Bank sold a financial asset and simultaneously enters into an agreement to repurchase the asset (or substantially similar asset) at a fixed price on a future date.

Securities sold under repurchase agreements are presented as liabilities in the statement of financial position at the agreed repurchase price less the difference between the selling price and agreed repurchase price. The difference between the selling price and agreed repurchase price is amortised as interest expense over the period commencing from the selling date to the repurchase date.

o. Acceptance receivables and payables

Subsequent to initial recognition, acceptance receivables and payables are measured at amortised cost using the effective interest method.

p. Investment in shares

(A) Investment in shares

Investment in shares of stock are long-term investments in non-public companies.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Penyertaan saham (lanjutan)

(A) Penyertaan saham (lanjutan)

Penyertaan saham merupakan investasi jangka panjang pada perusahaan non-publik.

Penyertaan dalam bentuk saham dengan kepemilikan kurang dari 20% yang nilai wajarnya tidak tersedia dan dimaksudkan untuk penyertaan jangka panjang dinyatakan sebesar estimasi terbaik atas nilai wajarnya. Bila terjadi penurunan nilai yang bersifat permanen, nilai tercatatnya dikurangi untuk mengakui penurunan tersebut yang ditentukan untuk setiap investasi secara individu dan kerugiannya dibebankan pada laporan laba rugi tahun berjalan.

(B) Penyertaan saham sementara

Penyertaan saham sementara merupakan penyertaan modal oleh Bank, dalam bentuk saham pada perusahaan debitur untuk mengatasi akibat kegagalan kredit, sebagaimana dimaksud dalam ketentuan peraturan perundang-undangan yang berlaku.

Bank wajib melakukan divestasi penyertaan saham sementara apabila penyertaan saham sementara telah melebihi jangka waktu paling lama 5 (lima) tahun atau perusahaan tersebut telah memperoleh saldo laba positif pada ekuitasnya.

Penyertaan dalam bentuk saham dengan kepemilikan lebih dari 20%, tanpa ada pengaruh signifikan diklasifikasikan sebagai aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi. Lihat Catatan 2d untuk kebijakan akuntansi atas aset keuangan dalam kelompok yang diukur pada nilai wajar melalui laporan laba rugi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

p. Investment in shares (continued)

(A) Investment in shares (continued)

Investment in shares of stock are long-term investments in non-public companies.

Investments in shares of stock where the ownership interest of less than 20% that do not have readily determinable fair values and are intended for long-term investments are stated at their best estimate of fair value. The carrying amount of the investments is written-down to recognise a permanent decline in the value of the individual investments. Any such write-down is charged directly to current year statement of profit or loss.

(B) Temporary investment in shares

Temporary investment in shares is investment in shares by Bank to debtor's company to overcome the credit defaults, in accordance with the prevailing laws.

Bank is obliged to divest temporary investment in shares if the temporary investment in shares have exceeded if maximum period of 5 (five) years or the company have obtained positive retained earnings in equity.

Investments in shares where the ownership above 20%, without any significant influence is classified as financial assets at fair value through profit or loss. Refer to Note 2d for the accounting policy of financial assets at fair value through profit or loss.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

q. Aset tetap dan penyusutan

Pada tanggal 30 November 2015, Bank melakukan perubahan kebijakan akuntansi atas aset tetap dari model biaya menjadi model revaluasi.

Aset tetap Bank disajikan sebesar nilai wajar, dikurangi akumulasi penyusutan dan cadangan kerugian penurunan nilai untuk aset tetap (jika ada). Penilaian terhadap aset tetap dilakukan oleh penilai independen eksternal yang telah memiliki sertifikasi. Penilaian atas aset tersebut dilakukan secara berkala untuk memastikan bahwa nilai wajar aset yang direvaluasi tidak berbeda secara material dengan nilai tercatatnya. Berdasarkan kebijakan internal Bank, penilaian terhadap aset tetap yang dilakukan oleh penilai independen eksternal dilakukan 5 tahun sekali. Akumulasi penyusutan pada tanggal revaluasi dieliminasi terhadap nilai tercatat bruto aset, dan nilai bersihnya disajikan kembali sebesar nilai revaluasian aset tetap.

Kenaikan nilai tercatat yang timbul dari revaluasi aset tetap dicatat sebagai "Surplus revaluasi aset" dan disajikan sebagai "Penghasilan Komprehensif Lain". Penurunan yang menghapus nilai kenaikan yang sebelumnya atas aset yang sama dibebankan terhadap "Surplus revaluasi aset" sebagai bagian dari laba komprehensif; penurunan lainnya dibebankan pada laporan laba rugi konsolidasian.

Surplus revaluasi aset tetap dialihkan langsung ke saldo laba ketika aset tersebut dihentikan pengakuannya.

Tanah tidak disusutkan.

Penyusutan aset tetap selain tanah dihitung dengan menggunakan metode garis lurus untuk mengalokasikan nilai setelah revaluasi terhadap nilai sisa sepanjang estimasi masa manfaatnya sebagai berikut:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

q. Fixed assets and depreciation

On November 30, 2015, the Bank changed their accounting policies of fixed assets from cost model to revaluation model.

The Bank's fixed assets are shown at fair value, less subsequent depreciation for fixed assets less accumulated impairment losses (if any). Valuation of fixed assets are performed by external independent valuers with certain qualification. Valuations are performed with sufficient regularity to ensure that the fair value of a revalued asset does not differ materially from its carrying amount. Based on Bank's internal policy, valuation of fixed assets performed by external independent valuers for every 5 years. Any accumulated depreciation at the date of revaluation is eliminated against the gross carrying amount of the asset, and the net amount is restated to the revalued amount of the asset.

Increases in the carrying amount arising on revaluation of fixed assets recorded in "Assets revaluation reserve" and presented as "Other Comprehensive Income". Decreases that offset previous increases of the same asset are debited against "Asset revaluation reserve" as part of other comprehensive income; all other decreases are charged to the consolidated statement of profit or loss.

Gain on revaluation of fixed assets are transferred to retained earnings when fixed assets are derecognised.

Land is not depreciated.

Depreciation of fixed assets other than land are calculated based on the straight-line method to allocate their revalued amount to their residual values over their estimated useful lives as follows:

	Masa manfaat/ *Useful lives* Tahun/*Years*	**Penyusutan (persentase)/ *Depreciation (percentage)***	
Gedung kantor	20	5%	*Office buildings*
Kendaraan bermotor	4	25%	*Vehicles*
Mesin dan peralatan	4	25%	*Machinery and equipment*
Perlengkapan dan perabotan kantor	4	25%	*Office furniture and equipment*

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

q. Aset tetap dan penyusutan (lanjutan)

Nilai sisa aset, masa manfaat, dan metode penyusutan akan ditinjau dan jika perlu disesuaikan pada setiap akhir periode pelaporan.

Pada tanggal 31 Desember 2023 dan 2022, tidak terdapat penyesuaian atas masa manfaat dan metode penyusutan.

Apabila nilai tercatat aset lebih besar dari nilai yang dapat diperoleh kembali, nilai tercatat aset diturunkan menjadi sebesar nilai yang dapat diperoleh kembali, dengan menggunakan nilai tertinggi antara harga jual bersih dan nilai pakai.

Apabila aset tetap tidak digunakan lagi atau dijual, maka nilai wajar dan akumulasi penyusutannya dihapuskan dari laporan keuangan. Keuntungan atau kerugian yang terjadi, diakui sebagai laba/rugi periode terjadinya.

Biaya pemeliharaan dan perbaikan dicatat sebagai beban pada saat terjadinya. Pengeluaran yang memperpanjang masa manfaat aset dikapitalisasi dan disusutkan.

Aset tetap dalam proses pembangunan merupakan aset yang masih dalam proses renovasi atau pemasangan dan belum siap digunakan, serta dimaksudkan untuk dipergunakan dalam kegiatan usaha. Aset ini dicatat sebesar biaya yang telah dikeluarkan.

r. Aset tak berwujud

Aset tak berwujud yang dimiliki oleh Bank berupa perangkat lunak.

Perangkat lunak, yang bukan merupakan bagian integral dari perangkat keras yang terkait, dicatat sebagai aset tak berwujud dan dinyatakan sebesar nilai tercatat, yaitu sebesar harga perolehan dikurangi dengan akumulasi amortisasi.

Biaya perolehan perangkat lunak terdiri dari seluruh pengeluaran yang dapat dikaitkan langsung dalam persiapan perangkat lunak tersebut sehingga siap digunakan sesuai dengan maksud manajemen.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

q. Fixed assets and depreciation (continued)

The assets residual values, useful lives, and depreciation method are reviewed and adjusted if appropriate at the end of each reporting period.

As of December 31, 2023 and 2022, there are no adjustment on useful life and depreciation method.

When the carrying amount of an asset is greater than its estimated recoverable amount, it is written down immediately to its recoverable amount, which is determined as the higher of net selling price or value in use.

When assets are retired or disposed, their fair value and the related accumulated depreciation are eliminated from the financial statements. The resulting gains or losses are recognised as related period's profit/loss.

Maintenance and repair cost are charged as an expense when incurred. Expenditure that extends the useful life of assets is capitalised and depreciated.

Assets under construction consist of assets that are still in progress of renovation or installments and not yet ready for use and intended to be used in business activity. This accounts recorded based on amounts paid.

r. Intangible assets

Intangible assets held by the Bank is software.

The software, that is not an integral part of the related hardware, is recorded as an intangible asset and is stated at carrying value, which is at cost less accumulated amortisation.

Software acquisition costs consist of all expenditures attributed directly in the preparation of the software so ready to use in accordance with the intent of management.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

r. Aset tak berwujud (lanjutan)

Pengeluaran setelah perolehan perangkat lunak dapat ditambahkan pada biaya perolehan perangkat lunak atau dikapitalisasi sebagai perangkat lunak hanya jika pengeluaran tersebut menambah manfaat ekonomis masa depan dari perangkat lunak yang bersangkutan sehingga menjadi lebih besar dari standar kinerja yang diperkirakan semula. Pengeluaran yang tidak menambah manfaat ekonomis masa depan dari perangkat lunak diakui sebagai beban pada saat terjadinya.

Perangkat lunak dengan umur manfaat terbatas, diamortisasi dengan menggunakan metode garis lurus selama estimasi masa manfaat ekonomis aset yaitu 4 (empat) tahun.

s. Agunan yang diambil alih

Agunan yang diambil alih (AYDA) adalah aset yang diperoleh Bank, baik melalui pelelangan maupun diluar pelelangan berdasarkan penyerahan secara sukarela oleh pemilik agunan atau berdasarkan kuasa untuk menjual diluar lelang dari pemilik agunan dalam hal debitur tidak memenuhi kewajibannya kepada Bank. AYDA merupakan jaminan yang diambil alih sebagai bagian dari penyelesaian pinjaman yang diberikan, piutang dan pembiayaan syariah. Bank memiliki kebijakan untuk selalu berusaha menjual AYDA untuk menyelesaikan sisa kewajiban debitur.

AYDA diakui sebesar jumlah yang lebih rendah antara nilai tercatat dengan nilai bersih yang dapat direalisasi (*net realisable value*), yaitu nilai wajar agunan setelah dikurangi estimasi biaya pelepasan. Bila terjadi penurunan nilai yang bersifat permanen, maka nilai tercatatnya dikurangi untuk mengakui penurunan tersebut dan kerugiannya dibebankan dalam laporan laba rugi.

Biaya pemeliharaan atas AYDA yang terjadi setelah pengambilalihan atau akuisisi aset dibebankan sebagai laba/rugi pada saat terjadinya. Keuntungan atau kerugian dari penjualan agunan yang diambil alih diakui sebagai laba/rugi tahun berjalan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

r. Intangible assets (continued)

Expenditures after acquisition software can be added to the cost of software or capitalised as software only if the expenses add future economic benefits of the software so as to be larger than originally expected performance standards. Expenditure that does not add to future economic benefits of the software are recognised as an expense when incurred.

Software with certain useful life, are amortised using straight-line method over the estimated useful life of the assets, which is 4 (four) years.

s. Foreclosed assets

Foreclosed assets represent assets acquired by Bank, both from auction and non-auction based on voluntary transfer by the debtors or based on debtor's approval to sell the collateral where the debtors could not fulfill their obligations to Bank. Foreclosed assets represent collateral acquired in settlement of loans, sharia financing and receivables. The Bank has policy to sell foreclosed assets to settle debtor's liabilities.

Foreclosed assets are recognised at lower amount between carrying value and their net realisable value, which is the fair value of the foreclosed assets less estimated cost of liquidating the foreclosed assets. If there is a permanent decline in value, the carrying amount of foreclosed collaterals in written down to recognise such permanent decline in value. Any such write-down is recognised statement of profit or loss.

Holding costs of foreclosed assets subsequent to the foreclosure or acquisition of the assets are charged as current year profit/loss as incurred. Gains or losses from sale of foreclosed assets are charged as current year profit/loss as incurred.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

t. Biaya dibayar dimuka dan aset lain-lain

Biaya dibayar dimuka merupakan pembayaran kepada pihak lain yang telah dilakukan namun belum merupakan beban pada saat pembayaran dilakukan. Biaya dibayar dimuka akan digunakan untuk aktivitas Bank di masa mendatang. Biaya dibayar dimuka akan diakui sebagai beban pada saat diamortisasi sesuai dengan masa manfaatnya.

Termasuk dalam biaya dibayar dimuka adalah pembiayaan, pengembangan teknologi, promosi dan beban renovasi gedung.

Termasuk di dalam aset lain-lain antara lain adalah uang muka jaminan, uang muka pembelian aset, dan uang muka pengembangan teknologi.

u. Simpanan nasabah dan simpanan dari bank lain

Simpanan nasabah adalah dana yang dipercayakan oleh masyarakat (selain bank) kepada Bank berdasarkan perjanjian penyimpanan dana. Termasuk dalam pos ini adalah giro, tabungan, deposito berjangka, sertifikat deposito dan bentuk lain yang dapat dipersamakan dengan itu.

Simpanan dari bank lain terdiri dari liabilitas terhadap bank lain dalam bentuk giro, *interbank call money*, deposito berjangka, tabungan, dan *deposito on call*.

Simpanan dari nasabah dan dari bank lain diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

t. Prepaid expenses and other assets

Prepaid expenses are payments made to other parties but have not been recognised as expense at the time of payment. Prepaid expenses will be used for Bank's activities in the future. Prepaid expenses are recognised as expenses during the amortisation in accordance with the expected period of benefit.

Included in prepaid expenses are financing, technology development, promotion and office building renovation expense.

Included in other assets are amongst others membership deposits, advance for fixed assets purchase, advance for technology development.

u. Deposits from customers and deposits from other banks

Deposits from customers are the funds placed by customers (excluding banks) with Bank based on fund deposit agreements. Included in this account are demand deposits, saving deposits, time deposits, certificates of deposits, and other forms which are similar.

Deposits from other banks represent liabilities to banks in the form of demand deposits, inter-bank call money, time deposits, saving accounts, and deposits on call.

Deposits from customers and other banks are classified as financial liabilities measured at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities measured at amortised cost.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

v. Efek-efek yang diterbitkan

Efek-efek yang diterbitkan adalah obligasi yang diterbitkan dan diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atau liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

Biaya transaksi yang timbul sehubungan dengan penerbitan efek-efek dikurangkan dari hasil penerbitan efek-efek bersangkutan. Selisih antara hasil emisi bersih dengan nilai nominal obligasi diakui sebagai diskonto yang diamortisasi menggunakan metode suku bunga efektif selama umur obligasi.

w. Pinjaman yang diterima

Pada pengukuran awal pinjaman diterima dan pinjaman subordinasi disajikan sebesar nilai wajar dikurangi dengan biaya transaksi yang dapat diatribusikan langsung dengan perolehan/penerbitan pinjaman dan obligasi subordinasi.

Pinjaman yang diterima dan pinjaman subordinasi diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

x. Transaksi Sewa

Pada tanggal permulaan kontrak, Bank menilai apakah kontrak merupakan atau mengandung sewa. Suatu kontrak merupakan atau mengandung sewa jika kontrak tersebut memberikan hak untuk mengendalikan penggunaan aset identifikasian selama suatu jangka waktu untuk dipertukarkan dengan imbalan. Bank dapat memilih untuk tidak mengakui aset hak-guna dan liabilitas sewa untuk:

- Sewa jangka pendek; dan
- Sewa yang aset pendasarnya bernilai-rendah.

Untuk menilai apakah kontrak memberikan hak untuk mengendalikan penggunaan aset identifikasian, Bank harus menilai apakah:

- Bank memiliki hak untuk mendapatkan secara substansial seluruh manfaat ekonomi dari penggunaan aset identifikasian; dan

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

v. Marketable Securities issued

Marketable securities issued is the issuance of bond which is classified as financial liabilities measured at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities at amortised cost.

Transaction cost in relation with the marketable securities issued is deducted from the related marketable securities issued. Any difference between net proceed of bond issuance and nominal of bond is recognised as discount and will be amortised using effective interest rate during bond's period.

w. Borrowings

Borrowings and subordinated loans are initially presented at fair value less directly attributable transaction costs to the acquisition or issuance of subordinated loans and bonds.

Borrowings and subordinated loans are classified as financial liabilities measured at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities measured at amortised cost.

x. Leases Transaction

At the inception of a contract, the Bank assesses whether the contract is or contains a leases. A contract is or contains a leases if the contract conveys the right to control the use of an identified assets for a period of time in exchange for consideration. The Bank can choose not to recognise the right-of-use asset and lease liabilities for:

- *Short-term lease; and*
- *Low value asset.*

To assess whether a contract conveys the right to control the use of an identified asset, the Bank shall assess whether:

- *The Bank has the right to obtain substantially all the economic benefit from use of the asset throughout the period of use; and*

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

x. Transaksi Sewa (lanjutan)

Untuk menilai apakah kontrak memberikan hak untuk mengendalikan penggunaan aset identifikasian, Bank harus menilai apakah: (lanjutan)

- Bank memiliki hak untuk mengarahkan penggunaan aset identifikasian. Bank memiliki hak ini ketika Bank memiliki hak untuk pengambilan keputusan yang relevan tentang bagaimana dan untuk tujuan apa aset digunakan telah ditentukan sebelumnya:
  1. Bank memiliki hak untuk mengoperasikan aset; dan
  2. Bank telah mendesain aset dengan cara menetapkan sebelumnya bagaimana dan untuk tujuan apa aset akan digunakan selama periode penggunaan.

Pada tanggal permulaan sewa, Bank mengakui aset hak-guna dan liabilitas sewa. Aset hak-guna diukur pada biaya perolehan, dimana meliputi jumlah pengukuran awal liabilitas sewa yang disesuaikan dengan pembayaran sewa yang dilakukan pada atau sebelum tanggal permulaan, ditambah dengan biaya langsung awal yang dikeluarkan. Aset hak-guna diamortisasi dengan menggunakan metode garis lurus sepanjang jangka waktu sewa.

Liabilitas sewa diukur pada nilai kini pembayaran sewa yang belum dibayar pada tanggal permulaan, didiskontokan dengan menggunakan suku bunga implisit dalam sewa atau jika suku bunga tersebut tidak dapat ditentukan, maka menggunakan suku bunga pinjaman inkremental. Pada umumnya, Bank menggunakan suku bunga pinjaman inkremental sebagai tingkat bunga diskonto.

Pembayaran sewa dialokasikan menjadi bagian pokok dan biaya keuangan. Biaya keuangan dibebankan pada laba rugi selama periode sewa sehingga menghasilkan tingkat suku bunga periodik yang konstan atas saldo liabilitas untuk setiap periode.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

x. Leases Transaction (continued)

To assess whether a contract conveys the right to control the use of an identified asset, the Bank shall assess whether: (continued)

- *The Bank has the right to direct the use of the asset. The Bank has described when it has a decision-making rights that are the most relevant to changing how and for what purpose the asset is used are predetermined:*
  1. *The Bank has the right to operate the asset; and*
  2. *The Bank has designed the asset in a way that predetermine how and for what purpose it will be used.*

The Bank recognises a right-of-use asset and a leases liability at the leases commencement date. The right-of-use asset is initially measured at cost, which comprises the initial amount of the leases liability adjusted for any leases payment made at or before the commencement date, plus any initial direct cost incurred. The right-of-use asset is amortised over the straight-line method throughout the lease term.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease or, if that right cannot be readily determined, using incremental borrowing rate. Generally, the Bank uses its incremental borrowing rate as a discount rate.

Each leases payment is allocated between the liability and finance cost. The finance cost is charged to profit or loss over the leases period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

x. Transaksi Sewa (lanjutan)

Jika sewa mengalihkan kepemilikan aset pendasar kepada Bank pada akhir masa sewa atau jika biaya perolehan aset hak-guna merefleksikan Bank akan mengeksekusi opsi beli, maka Bank menyusutkan aset hak-guna dari tanggal permulaan hingga akhir umur manfaat aset pendasar. Jika tidak, maka Bank menyusutkan aset hak-guna dari tanggal permulaan hingga tanggal yang lebih awal antara akhir umur manfaat aset hak-guna atau akhir masa sewa.

Bank menganalisa fakta dan keadaan untuk masing-masing jenis hak atas tanah dalam menentukan akuntansi untuk masing-masing hak atas tanah tersebut sehingga dapat merepresentasikan dengan tepat suatu kejadian atau transaksi ekonomik yang mendasarinya. Jika hak atas tanah tersebut tidak mengalihkan pengendalian atas aset pendasar kepada Bank, melainkan mengalihkan hak untuk menggunakan aset pendasar, Bank menerapkan perlakuan akuntansi atas transaksi tersebut sebagai sewa berdasarkan PSAK 73, "Sewa", kecuali jika hak atas tanah secara substansi menyerupai pembelian tanah, maka Bank menerapkan PSAK 16, "Aset tetap".

Modifikasi sewa

Bank mencatat modifikasi sewa sebagai sewa terpisah jika:

- modifikasi meningkatkan ruang lingkup sewa dengan menambahkan hak untuk menggunakan satu aset pendasar atau lebih;
- imbalan sewa meningkat sebesar jumlah yang setara dengan harga tersendiri untuk peningkatan dalam ruang lingkup dan penyesuaian yang tepat pada harga tersendiri tersebut untuk merefleksikan kondisi kontrak tertentu.

y. Pendapatan dan beban bunga dan syariah

Konvensional

Pendapatan dan beban bunga untuk semua instrumen keuangan dengan *interest bearing* dicatat dalam pendapatan bunga dan beban bunga menggunakan metode suku bunga efektif.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

x. Leases Transaction (continued)

If the leases transfers ownership of the underlying asset to the Bank by the end of the leases term or if the cost of the right-of-use asset reflects that the Bank will exercise a purchase option, the Bank depreciates the right-of-use asset from the commencement date to the end of the useful life of the underlying asset. Otherwise, the Bank depreciates the right-of-use asset from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the leases term.

The Bank analyses the facts and circumstances for each type of landrights in determining the accounting for each of these land rights so that it can accurately represent an underlying economic event or transaction. If the landrights do not transfer control of the underlying assets to the Bank, but gives the rights to use the underlying assets, the Bank applies the accounting treatment of these transactions as leases under SFAS 73, "Lease", except if landrights substantially similar to land purchases, the Bank applies SFAS 16, "Property, plant and equipment".

Leases modification

The Bank account for a leases modification as a separate leases if both:

- *the modification increases the scope of the leases by adding the right to use one or more underlying assets;*
- *the consideration for the leases increases by an amount commensurate with the stand-alone price for the increase in scope and any appropriate adjustments to that stand-alone price to reflect the circumstances of the particular contract.*

y. Interest income and expense and sharia

Conventional

Interest income and expense for all interest bearing financial instruments are recorded within interest income and interest expense using the effective interest rate method.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Pendapatan dan beban bunga dan syariah (lanjutan)

Konvensional (lanjutan)

Metode suku bunga efektif adalah metode yang digunakan untuk menghitung biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan dan metode untuk mengalokasikan pendapatan bunga atau beban bunga selama periode yang relevan.

Suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi pembayaran atau penerimaan kas di masa datang selama perkiraan umur dari instrumen keuangan, atau bilamana tepat, digunakan periode yang lebih singkat untuk memperoleh nilai tercatat bersih dari aset keuangan atau liabilitas keuangan. Pada saat menghitung suku bunga efektif, Bank mengestimasi arus kas dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, namun tidak mempertimbangkan kerugian kredit di masa datang. Perhitungan ini mencakup seluruh komisi, provisi, dan bentuk lain yang dibayarkan atau diterima oleh para pihak dalam kontrak yang merupakan bagian tak terpisahkan dari suku bunga efektif, biaya transaksi, dan seluruh premi atau diskon lainnya.

Jika aset keuangan atau kelompok aset keuangan serupa telah diturunkan nilainya sebagai akibat kerugian penurunan nilai, maka pendapatan bunga yang diperoleh setelahnya diakui atas bagian aset keuangan yang tidak mengalami penurunan nilai, berdasarkan suku bunga yang digunakan untuk mendiskonto arus kas masa datang dalam menghitung kerugian penurunan nilai.

Pendapatan bunga atas pinjaman yang diberikan atau aset produktif lainnya yang diklasifikasikan sebagai bermasalah diakui pada saat pendapatan tersebut diterima. Pada saat aset keuangan diklasifikasikan sebagai bermasalah, bunga yang telah diakui tetapi belum ditagih akan dibatalkan pengakuannya. Selanjutnya bunga yang dibatalkan tersebut diakui sebagai tagihan kontinjensi.

Pendapatan dan beban syariah

Pendapatan pengelolaan dana oleh Entitas Anak sebagai *mudharib* terdiri atas pendapatan dari jual dan beli transaksi *murabahah*, pendapatan bagi hasil dari *mudharabah* dan *musyarakah*, pendapatan dari sewa (*ijarah*) dan pendapatan usaha utama lainnya.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

y. Interest income and expense and sharia (continued)

Conventional (continued)

The effective interest rate method is a method of calculating the amortised cost of a financial asset or a financial liability and method of allocating the interest income or interest expense over the relevant period.

The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or, when appropriate, a shorter period to the net carrying amount of the financial asset or financial liability. When calculating the effective interest rate, Bank estimates cash flows considering all contractual terms of the financial instrument, but does not consider future credit losses. The calculation includes all fees, commissions, and other fees paid or received between parties to the contract that are an integral part of the effective interest rate, transaction costs, and all other premiums or discounts.

Once a financial asset or a bank of similar financial assets has been written down as a result of an impairment loss, interest income is recognised on the unimpaired portion using the rate of interest used to discount the future cash flows for the purpose of measuring the impairment loss.

Interest income on loans or other earning assets classified as non-performing is recognised at the time the interest is received. When a financial asset is classified as non-performing, any interest income previously recognised but not yet collected is reversed against interest income. The reversed interest income is recognised as a contingent receivable.

Sharia income and expense

Revenue from fund management by Subsidiary as mudharib consists of income from sales and purchases of murabahah transactions, profit sharing from mudharabah and musyarakah financing, income from lease (ijarah) and other main operating income.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Pendapatan dan beban bunga dan syariah (lanjutan)

Pendapatan dan beban syariah (lanjutan)

Entitas Anak menetapkan kebijakan tingkat risiko berdasarkan ketentuan internal. Entitas Anak melakukan penghentian amortisasi pendapatan ditangguhkan pada saat pembiayaan diklasifikasikan sebagai *non-performing*. Pendapatan Entitas Anak dari transaksi usaha yang diklasifikasikan sebagai *non-performing* dicatat sebagai pendapatan yang akan diterima pada laporan komitmen dan kontinjensi.

Pendapatan *ijarah* diakui selama masa akad menggunakan metode *flat* (proporsional).

Pendapatan bagi hasil *musyarakah* yang menjadi hak mitra pasif diakui dalam periode terjadinya hak bagi hasil sesuai *nisbah* yang disepakati.

Pendapatan bagi hasil *mudharabah* diakui dalam periode terjadinya hak bagi hasil sesuai *nisbah* yang disepakati dan tidak diperkenankan mengakui pendapatan dari proyeksi hasil usaha.

Pengakuan pendapatan atas piutang *murabahah* diakui pada laba rugi dengan menggunakan metode tingkat imbal hasil efektif.

Tingkat imbal hasil efektif merupakan metode alokasi pengakuan pendapatan dan merupakan tingkat imbal hasil yang secara tepat mendiskontokan estimasi penerimaan kas di masa depan selama perkiraan umur dari piutang *murabahah* untuk memperoleh biaya perolehan diamortisasi dari piutang *murabahah*. Pada saat menghitung tingkat imbal hasil efektif, Entitas Anak mengestimasi arus kas di masa datang dengan mempertimbangkan seluruh persyaratan kontraktual dalam piutang *murabahah* tersebut, tetapi tidak mempertimbangkan kerugian piutang di masa mendatang. Perhitungan ini mencakup seluruh komisi, provisi, dan bentuk lain yang diterima oleh para pihak dalam akad yang merupakan bagian tidak terpisahkan dari tingkat imbal hasil efektif, biaya transaksi, dan seluruh premi atau diskon lainnya.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

y. Interest income and expense and sharia (continued)

Sharia income and expense (continued)

The Subsidiary prescribes the risk rate policies based on the internal regulation. The Subsidiary leases the amortisation of deferred income at the time its financing is classified as non-performing. The Subsidiary's income from business transactions that are classified as non-performing is recorded as revenue to be received in the statement of commitments and contingencies.

Income from ijarah is recognised over the period of the contract with flat (proportional) method.

Profit sharing income for passive partner in musyarakah is recognised in the period when the right arises in accordance with nisbah (the agreed sharing ratio).

Profit sharing income from mudharabah is recognised in the period when the right arises in accordance with the agreed sharing ratio and the recognition based on projection of income is not allowed.

The revenue recognition of murabahah receivables are recognised in profit or loss using the effective rate of return method.

Effective rate of return is an allocation method of revenue recognition and the rate that exactly discounts the estimated future cash receipts through the expected life of the murabahah receivable to obtain the carrying amount of a murabahah receivable. When calculating the effective rate of return, the Subsidiary estimates future cash flows by considering all contractual terms of the murabahah receivable, but does not consider the loss of receivables in the future. This calculation includes all commissions, fees, and other forms received by the parties in a contract that are an integral part of the effective rate of return, transaction costs, and all other premiums or discounts.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Pendapatan dan beban bunga dan syariah (lanjutan)

Pendapatan dan beban syariah (lanjutan)

Hak nasabah atas bagi hasil dana *syirkah* temporer merupakan bagian bagi hasil milik nasabah yang didasarkan pada prinsip mudharabah atas hasil pengelolaan dana mereka oleh Entitas Anak. Pendapatan yang dibagikan adalah kas yang telah diterima (*cash basis*) dari bagi hasil.

Pembagian hasil usaha dilakukan berdasarkan prinsip bagi hasil usaha yaitu dari laba kotor Entitas Anak (*gross profit margin*).

Pendapatan marjin dan bagi hasil atas pembiayaan yang diberikan dan atas aset produktif lainnya akan dibagikan kepada nasabah penyimpan dana dan Entitas Anak sesuai dengan proporsi dana yang dipakai dalam pembiayaan yang diberikan dan aset produktif lainnya. Pendapatan marjin dan bagi hasil yang tersedia untuk nasabah tersebut kemudian dibagihasilkan ke nasabah penabung dan deposan sebagai *shahibul maal* dan Entitas Anak sebagai *mudharib* sesuai porsi *nisbah* bagi hasil yang telah disepakati bersama sebelumnya. Pendapatan marjin dan bagi hasil dari pembiayaan dan aset produktif lainnya yang memakai dana Entitas Anak, seluruhnya menjadi milik Entitas Anak, termasuk pendapatan dari investasi bank berbasis imbalan.

z. Pendapatan provisi dan komisi

Provisi dan komisi yang berkaitan langsung dengan kegiatan pemberian pinjaman diakui sebagai bagian/(pengurang) dari biaya perolehan pinjaman dan akan diakui sebagai pendapatan bunga dengan cara diamortisasi berdasarkan metode suku bunga efektif.

Pendapatan provisi dan komisi yang tidak berkaitan dengan kegiatan pemberian pinjaman atas suatu jangka waktu diakui sebagai pendapatan pada saat terjadinya transaksi sebagai pendapatan operasional lainnya.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

y. Interest income and expense and sharia (continued)

Sharia income and expense (continued)

Third parties's share on returns of temporary syirkah funds represents customer's share on the Subsidiary's income derived from the management of their funds by the Subsidiary under mudharabah principles. Income that will be distributed is the cash received (cash basis) from the share.

The distribution of revenue is based on profit sharing scheme on the Subsidiary's gross profit margin.

Margin income and profit sharing on financing facilities and other earning assets are distributed to fund owners and the Subsidiary based on proportion of fund used in the financing and other earning assets. Margin income and profit sharing income allocated to the fund owners are then distributed to fund owners as shahibul maal and the Subsidiary as mudharib based on a predetermined ratio (nisbah). Margin income and profit sharing from financing facilities and other earning assets using the Subsidiary's funds, are entirely shared for the Subsidiary, including income from the Subsidiary's fee-based transactions.

z. Fees and commissions income

Fees and commissions income directly related to lending activities, are recognised as a part/(deduction) of lending cost and will be recognised as interest income by amortising the carrying value of loan with effective interest rate method.

Fees and commissions income which are not related to lending activities on a specific period are recognised as income incurred at the transaction date as other operating income.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

aa. Pendapatan dan beban operasional lainnya

Beban tenaga kerja

Beban tenaga kerja meliputi beban berupa gaji karyawan, bonus, lembur dan tunjangan.

Beban umum dan administrasi

Beban umum dan administrasi merupakan beban yang timbul sehubungan dengan aktivitas kantor dan operasional Bank.

Seluruh pendapatan dan beban yang terjadi dibebankan sebagai laba/rugi pada saat terjadinya.

ab. Perpajakan

Beban pajak terdiri dari pajak kini dan pajak tangguhan. Pajak diakui dalam laporan laba rugi, kecuali jika pajak tersebut terkait dengan transaksi atau kejadian yang langsung diakui di pendapatan komprehensif lain atau langsung diakui ke ekuitas. Dalam hal ini, pajak tersebut masing-masing diakui dalam pendapatan komprehensif lain atau ekuitas.

Manajemen secara periodik mengevaluasi posisi yang dilaporkan di Surat Pemberitahuan Tahunan ("SPT") sehubungan dengan situasi dimana aturan pajak yang berbeda membutuhkan interpretasi. Jika perlu, manajemen menentukan provisi berdasarkan jumlah yang diharapkan akan dibayar kepada otoritas pajak.

Pajak penghasilan tangguhan disajikan dengan menggunakan metode liabilitas. Pajak penghasilan tangguhan timbul akibat perbedaan temporer antara aset dan liabilitas menurut ketentuan-ketentuan pajak dengan nilai tercatat aset dan liabilitas dalam laporan keuangan. Tarif pajak yang berlaku atau yang secara substansial telah berlaku digunakan dalam menentukan besarnya jumlah pajak penghasilan tangguhan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

aa. Other operating income and expenses

Personnel expenses

Personnel expenses include expenses related with salaries for employees, bonuses, overtime and allowances.

General and administrative expenses

General and administrative expenses represent expenses related to office activities and Bank operational activities.

All of these income and expenses are recorded as profit/loss when incurred.

ab. Taxation

The tax expense comprises of current and deferred tax. Tax is recognised in the profit or loss, except to the extent that it relates to items recognised directly in other comprehensive income or in equity. In this case, the tax is also recognised in other comprehensive income or in equity, respectively.

Management periodically evaluates positions takes in tax return with respect to situations in which applicable tax regulation is subject to interpretation. It establishes provision where appropriate, on the basis of amounts expected to be paid to the tax authorities.

Deferred income tax is provided using the liability method. Deferred income tax on temporary differences arising between the tax base of assets and liabilities and their carrying amounts in the financial statements. Currently enacted or substantially enacted tax rates are used in the determination of deferred income tax.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ab. Perpajakan (lanjutan)

Aset pajak tangguhan diakui apabila terdapat kemungkinan besar bahwa jumlah laba fiskal di masa mendatang akan memadai untuk mengkompensasi perbedaan temporer yang menimbulkan aset pajak tangguhan tersebut. Aset dan liabilitas pajak penghasilan tangguhan dapat saling hapus apabila terdapat hak yang berkekuatan hukum untuk melakukan saling hapus antara aset pajak kini dengan liabilitas pajak kini dan apabila aset dan pajak penghasilan tangguhan dikenakan oleh otoritas perpajakan yang sama dan adanya niat untuk melakukan penyelesaian saldo secara bersih.

Taksiran pajak penghasilan Bank dihitung untuk masing-masing perusahaan sebagai badan hukum terpisah. Aset pajak kini dan liabilitas pajak kini untuk badan hukum yang berbeda tidak disalinghapuskan dalam laporan keuangan.

ac. Imbalan kerja

Imbalan kerja jangka pendek

Imbalan kerja jangka pendek diakui pada saat terutang kepada karyawan.

Liabilitas imbalan kerja karyawan

Bank memiliki program pensiun sesuai dengan peraturan dan perundang-undangan yang berhubungan dengan ketenagakerjaan atau kebijakan yang ditetapkan oleh Bank. Program ini pada umumnya didanai melalui pembayaran kepada pengelola dana pensiun yang besarnya ditentukan dalam perhitungan aktuarial yang dilakukan secara berkala.

Bank harus menyediakan program pensiun dengan jumlah minimal tertentu sesuai dengan UU Cipta Kerja No. 11/2020 (2020: Undang-Undang (UU) Ketenagakerjaan No. 13/2003). Karena Undang-Undang Ketenagakerjaan menentukan rumus tertentu untuk menghitung jumlah minimal imbalan pensiun, maka pada dasarnya program pensiun berdasarkan Undang-Undang Ketenagakerjaan adalah program manfaat pasti. Program pensiun manfaat pasti adalah program pensiun yang menentukan jumlah imbalan pensiun yang akan diberikan, biasanya didasarkan pada satu faktor atau lebih seperti usia, masa kerja atau jumlah kompensasi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ab. Taxation (continued)

Deferred tax assets are recognised to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilised. Deferred Income tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets against current tax liabilities and when deferred income taxes assets and liabilities relate to income taxes levied by the same taxation authority where tax is an intention to settle the balance on a net basis.

The estimated corporate income tax of Bank is calculated for each company as a separate legal entity. Current tax assets and current tax liabilities for different legal entities cannot be net-off in the financial statements.

ac. Employee benefits

Short term employee benefits

Short term employee benefits are recognised when they are accrued to the employees.

Employee benefits obligation

The Bank have pension scheme in accordance with prevailing labor-related laws and regulations of Bank's policies. The scheme is generally funded through payments to trustee-administered funds as determined by periodic actuarial calculations.

The Bank are required to provide a minimum amount of pension benefits in accordance with Job Creation Law Art No.11/2020 (2020: Labor Law No. 13/2003). Since the Labor Law sets the formula for determining the minimum amount of benefits, in substance pension plans under the Labor Law represent defined benefit plans. A defined benefit plan is a pension plan that defines an amount of pension benefit to be provided, usually as a function of one or more factors such as age, years of service or total compensation.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ac. Imbalan kerja (lanjutan)

Liabilitas imbalan kerja karyawan (lanjutan)

Liabilitas diakui pada laporan posisi keuangan sebesar nilai kini kewajiban imbalan pasti pada akhir periode pelaporan dikurangi nilai wajar aset program. Kewajiban imbalan pasti dihitung setiap tahun oleh aktuaris yang independen dengan menggunakan metode *projected unit credit*. Nilai kini kewajiban imbalan pasti ditentukan dengan mendiskontokan arus kas keluar yang diestimasi dengan menggunakan tingkat bunga Obligasi Pemerintah (dikarenakan saat ini tidak ada pasar aktif untuk obligasi perusahaan yang berkualitas tinggi) yang didenominasikan dalam Rupiah dimana imbalan akan dibayarkan dan memiliki jangka waktu jatuh tempo mendekati jangka waktu kewajiban pensiun.

Keuntungan dan kerugian aktuarial yang timbul dari penyesuaian dan perubahan dalam asumsi-asumsi aktuarial langsung diakui seluruhnya melalui pendapatan komprehensif lainnya pada saat terjadinya.

Biaya jasa lalu diakui segera dalam laporan laba rugi. Keuntungan dan kerugian dari kurtailmen atau penyelesaian program manfaat pasti diakui di laba rugi ketika kurtailmen atau penyelesaian tersebut terjadi.

Pesangon pemutusan kontrak terhutang ketika karyawan diberhentikan sebelum usia pensiun normal.

Bank mengakui pesangon pemutusan kontrak kerja ketika Bank menunjukkan komitmennya untuk memutuskan hubungan kerja dengan karyawan berdasarkan suatu rencana formal terperinci yang kecil kemungkinannya untuk dibatalkan. Pesangon yang akan dibayarkan dalam waktu lebih dari 12 (dua belas) bulan setelah tanggal laporan posisi keuangan didiskontokan untuk mencerminkan nilai kini.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ac. Employee benefits (continued)

Employee benefits obligation (continued)

The liability recognised in the statement of financial position is the present value of the defined benefit obligation at the end of the reporting period less the fair value of plan assets. The defined benefit obligation is calculated annually by independent actuaries using the projected unit credit method. The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of Government Bonds (considering currently there is no active market for high-quality corporate bonds) that are denominated in Rupiah in which the benefits will be paid, and that have terms to maturity approximating to the terms of the related pension obligation.

Actuarial gains and losses arising from experience adjustments and changes inactuarial assumptions charged or credited to equity in other comprehensive income in the period in which they arise.

Past-service costs are recognised immediately in the statements of profit or loss. Gains or losses on the curtailment or settlement of a defined benefit plan are recognised in the statement of profit or loss when the curtailment or settlement occurs.

Termination benefits are payable whenever an employee's employment is terminated before the normal retirement age.

The Bank recognise termination benefits when it is demonstrably committed to terminate the employment of current employees according to a detailed formal plan which has small probability to withdraw. Benefits, due more than 12 (twelve) months after statement of financial position's date are discounted to present value.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ac. Imbalan kerja (lanjutan)

Perubahan Kebijakan Akuntansi

Pada bulan April 2022, Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia ("DSAK IAI") menerbitkan siaran pers atas persyaratan pengatribusian imbalan pada periode jasa sesuai PSAK 24: Imbalan Kerja yang diadopsi dari IAS 19 *Employee Benefits*. Siaran pers tersebut menyampaikan informasi bahwa pola fakta umum dari program pensiun berbasis Undang-Undang Ketenagakerjaan yang berlaku di Indonesia saat ini memiliki pola fakta serupa dengan yang ditanggapi dan disimpulkan dalam *IFRS Intepretation Committee ("IFRIC") Agenda Decision Attributing Benefit to Periods of Service* (IAS 19). Kelompok Usaha telah menerapkan siaran pers tersebut dan dengan demikian merubah kebijakan akuntansi terkait atribusi imbalan kerja pada periode jasa dari kebijakan yang diterapkan sebelumnya.

Pada tahun-tahun sebelumnya, Bank mengatribusikan imbalan berdasarkan formula imbalan program imbalan pasti berdasarkan masa kerja sejak tanggal pekerja memberikan jasa hingga usia pensiun. Bank telah mengubah kebijakan akuntansinya untuk mengatribusikan imbalan berdasarkan program tersebut, yaitu dari tanggal ketika jasa pekerja pertama kali menghasilkan imbalan dalam program sampai dengan tanggal ketika jasa pekerja selanjutnya tidak akan menghasilkan jumlah imbalan yang material di bawah program tersebut.

ad. Laba per saham

Laba per saham dasar dihitung dengan membagi laba bersih dengan rata-rata tertimbang jumlah saham biasa yang beredar pada periode yang bersangkutan.

Laba per saham dilusian dihitung dengan membagi laba bersih dengan rata-rata tertimbang jumlah saham yang beredar ditambah dengan rata-rata tertimbang jumlah saham yang akan diterbitkan atas konversi efek yang berpotensi saham yang bersifat dilutif.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ac. Employee benefits (continued)

Changes in Accounting Policy

In April 2022, the Institute of Indonesia Chartered Accountant's Accounting Standard Board ("DSAK IAI") issued a press release regarding attribution of benefits to periods of service in accordance with FSAS 24: Imbalan Kerja which was adopted from IAS 19 Employee Benefits. The press release conveyed the information that the fact pattern of the pension program based on the Labor Law currently enacted in Indonesia is similar to those responded and concluded in the IFRS Interpretation Committee ("IFRIC") Agenda Decision Attributing Benefit to Periods of Service (IAS 19). The Company has adopted the said press release and accordingly changed its accounting policy regarding attribution of benefits to periods of service previously applied.

In prior years, the Bank attribute benefits under the defined benefit plan's benefit formula to periods of service from the date when employees provide their services until theirretirement age. The Bank change the policy for attributing benefits under the plan to the date when employee service first leads to benefits under the plan until the date when further employee service will lead to no material amount of further benefits under the plan.

ad. Earnings per share

Basic earnings per share is computed by dividing net income with the weighted average number of common shares outstanding during the period.

Diluted earnings per share is calculated by dividing net income by the weighted average number of shares outstanding plus the weighted average number of shares outstanding which would be issued on the conversion of the dilutive potential shares.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ae. Penjabaran mata uang asing

Laporan keuangan disajikan dalam mata uang Rupiah, yang merupakan mata uang fungsional dan penyajian Bank. Transaksi dalam mata uang asing dijabarkan ke mata uang Rupiah dengan menggunakan kurs yang berlaku pada tanggal transaksi tersebut. Pada setiap tanggal pelaporan, aset dan liabilitas moneter dalam mata uang asing dijabarkan ke mata uang Rupiah dengan kurs penutupan Bank Indonesia pada pukul 16:00 Waktu Indonesia Barat yang berlaku pada tanggal pelaporan.

Keuntungan dan kerugian selisih kurs yang timbul dari transaksi dalam mata uang asing dan penjabaran aset dan kewajiban moneter dalam mata uang asing, diakui dalam laporan laba rugi.

Berikut ini adalah kurs mata uang asing utama yang digunakan pada tanggal-tanggal 31 Desember 2023 dan 2022 yang menggunakan kurs tengah Reuters pukul 16:00 Waktu Indonesia Barat (nilai penuh):

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ae. Foreign currency translation

The financial statements are presented in Rupiah, which is the functional and presentation currency of the Bank. Transactions denominated in a foreign currency are converted into Rupiah at the exchange rate prevailing at the date of the transaction. As at each reporting date, monetary assets and liabilities in foreign currencies are translated into Rupiah using the Bank Indonesia closing exchange rate at 16:00 Western Indonesian Time prevailing at reporting date.

Exchange gains and losses arising on transactions in foreign currencies and on the translation of foreign currency monetary assets and liabilities are recognised in the statement of profit or loss.

Below are the major exchange rates used as of December 31, 2023 and 2022 using the Reuter's middle rates at 16:00 Western Indonesian Time (full amount):

	31 Desember/*December 31*,		
	2023	**2022**	
Poundsterling Inggris	19.627	18.786	*Great Britain Poundsterling*
Franc Swiss	18.299	16.827	*Swiss Franc*
Euro Eropa	17.038	16.582	*European Euro*
Dolar Amerika Serikat	15.397	15.568	*United States Dollar*
Dolar Singapura	11.676	11.593	*Singapore Dollar*
Dolar Kanada	11.630	11.486	*Canadian Dollar*
Dolar Australia	10.521	10.558	*Australian Dollar*
Dolar New Zealand	9.766	9.851	*New Zealand Dollar*
Riyal Arab	4.106	4.139	*Saudi Riyal*
Ringgit Malaysia	3.355	3.534	*Malaysian Ringgit*
Yuan China	2.170	2.239	*Chinese Yuan*
Dolar Hongkong	1.971	1.997	*Hongkong Dollar*
Dolar Taiwan	504	506	*New Taiwan Dollar*
Baht Thailand	450	451	*Thailand Baht*
Yen Jepang	109	118	*Japanese Yen*
Won Korea	12	12	*Korean Won*

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

af. Transaksi dengan pihak berelasi

Bank melakukan transaksi dengan pihak berelasi. Sesuai dengan PSAK 7 tentang "Pengungkapan Pihak-pihak yang Berelasi", yang dimaksud dengan pihak yang berelasi adalah orang atau entitas yang berelasi dengan entitas pelapor sebagai berikut:

a. Orang atau anggota keluarga terdekatnya berelasi dengan entitas pelapor jika orang tersebut:
   i. memiliki pengendalian atau pengendalian bersama terhadap entitas pelapor;
   ii. memiliki pengaruh signifikan terhadap entitas pelapor; atau
   iii. personal manajemen kunci entitas pelapor atau entitas induk pelapor.

b. Suatu entitas berelasi dengan entitas pelapor jika memenuhi hal-hal sebagai berikut:
   i. entitas dan entitas pelapor adalah anggota dari kelompok usaha yang sama (artinya entitas induk, entitas anak, dan entitas anak berikutnya terkait dengan entitas lain);
   ii. suatu entitas adalah entitas asosiasi atau ventura bersama bagi entitas lain (atau entitas asosiasi atau ventura bersama yang merupakan anggota suatu kelompok usaha, di mana entitas lain tersebut adalah anggotanya);
   iii. kedua entitas tersebut adalah ventura bersama dari pihak ketiga yang sama;
   iv. suatu entitas adalah ventura bersama dari entitas ketiga dan entitas yang lain adalah entitas asosiasi dari entitas ketiga;
   v. entitas tersebut adalah suatu program imbalan pasca kerja untuk imbalan kerja dari suatu entitas pelapor atau entitas yang terkait dengan entitas pelapor;
   vi. entitas yang dikendalikan atau dikendalikan bersama oleh orang yang diidentifikasi dalam butir (a); atau
   vii. orang yang diidentifikasi, dalam butir (a) (i) memiliki pengaruh signifikan terhadap entitas atau anggota manajemen kunci entitas (atau entitas induk dari entitas).

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

af. Transactions with related parties

The Bank has transactions with related parties. In accordance with SFAS 7 regarding "Related Party Disclosure", the meaning of a related party is a person or entity that is related to a reporting entity as follow:

a. A person or a close member of that person's family is related to a reporting entity if:
   i. has control or joint control over the reporting entity;
   ii. has significant influence over the reporting entity; or
   iii. is member of the key management personnel of the reporting entity or a parent of the reporting entity.

b. An entity is related to a reporting entity if any of the following conditions applies:
   i. the entity and the reporting entity are member of the same the company (which means that each parent, subsidiary, and fellow subsidiary is related to the others);
   ii. one entity is an associate or joint venture of the other entity (or an associate or joint venture of member of a company of which the other entity is a member);
   iii. both entities are joint ventures of the same third party;
   iv. one entity is a joint venture of a third entity and the other entity is an associate of the third entity;
   v. the entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity;
   vi. the entity controlled or jointly controlled by a person identified in (a); or
   vii. a person identified in (a) (i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ag. Pelaporan segmen

Sebuah segmen operasi adalah suatu komponen dari entitas:
a. yang terlibat dalam aktivitas bisnis yang memperoleh pendapatan dan menimbulkan beban (termasuk pendapatan dan beban yang terkait dengan transaksi dengan komponen lain dari entitas yang sama);
b. hasil operasinya dikaji ulang secara reguler oleh kepala operasional untuk membuat keputusan tentang sumber daya yang dialokasikan pada segmen tersebut dan menilai kinerjanya; dan
c. tersedia informasi keuangan yang dapat dipisahkan.

Bank menyajikan segmen operasi berdasarkan informasi yang disiapkan secara internal untuk pengambil keputusan operasional. Berdasarkan PSAK 5, sebuah segmen usaha adalah sekelompok aset dan operasi yang menyediakan barang atau jasa yang memiliki risiko serta tingkat pengembalian yang berbeda dengan segmen usaha lainnya.

Segmen operasi Bank disajikan berdasarkan bank umum - konvensional dan bank syariah.

Segmen geografis adalah komponen Bank yang dapat dibedakan dalam menghasilkan jasa pada lingkungan (wilayah) ekonomi tertentu dan komponen itu memiliki risiko dan imbalan yang berbeda dengan risiko dan imbalan pada komponen yang beroperasi pada lingkungan (wilayah) ekonomi lain. Bank melaporkan segmen geografis berdasarkan daerah Jadetabek, Jawa Barat, Jawa Tengah dan Jawa Timur dan Luar Jawa.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ag. Segment reporting

An operating segment is a component of entity which:
a. involves with business activities to generate income and expenses (include income and expenses relating to the transactions with other components with the same entity);
b. operations result is observed regularly by chief decision maker to make decisions regarding the allocation of resources and to evaluate the works; and

c. separated financial information is available.

Bank presents operating segments based on the information that internally is provided to the chief operating decision maker. Under SFAS 5, a business segment is a bank of assets and operations engaged in providing products or services that are subject to risks and returns that are difference from those of other business segments.

The Bank's operating segments are presented by commercial banks - conventional and sharia bank.

A geographical segment is a distinguishable component of the Bank that is engaged in providing services within a particular economic environment and that is subject to risks and returns that are different from those operating in other economic environments. The Bank report geographical segment information based on Jadetabek, West Java, Central and East Java and Non Java.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING

Beberapa estimasi dan asumsi dibuat dalam rangka penyusunan laporan keuangan dimana dibutuhkan pertimbangan manajemen dalam menentukan metodologi yang tepat untuk penilaian aset dan liabilitas.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS

Certain estimates and assumption are made in the presentation of the financial statements. These often require management judgement in determining the appropriate methodology for valuation of assets and liabilities.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Manajemen membuat estimasi dan asumsi yang berimplikasi pada pelaporan nilai aset dan liabilitas atas tahun keuangan satu tahun kedepan. Semua estimasi dan asumsi yang diharuskan oleh PSAK adalah estimasi terbaik yang didasarkan standar yang berlaku. Estimasi dan pertimbangan dievaluasi secara terus menerus dan berdasarkan pengalaman masa lalu dan faktor-faktor lain termasuk harapan atas kejadian yang akan datang.

Walaupun estimasi dan asumsi ini dibuat berdasarkan pengetahuan terbaik manajemen atas kejadian dan tindakan saat ini, hasil yang timbul mungkin berbeda dengan estimasi dan asumsi semula.

Cadangan kerugian penurunan nilai aset keuangan

Sesuai dengan PSAK 71, pengukuran cadangan kerugian penurunan nilai aset keuangan yang diukur pada biaya perolehan diamortisasi dan diukur pada nilai wajar melalui penghasilan komprehensif lain membutuhkan penggunaan model yang kompleks dan asumsi signifikan terkait *future economic conditions* dan *credit behavior.*

Estimasi signifikan dibutuhkan dalam menerapkan perhitungan cadangan kerugian penurunan nilai berdasarkan PSAK 71, antara lain:

- Penentuan kriteria *significant increase in Credit Risk*:
- Menentukan model yang tepat dan asumsi untuk perhitungan cadangan kerugian penurunan nilai;
- Menentukan jumlah dan pembebanan relatif atas skenario *forward-looking* untuk masing-masing segmen/produk;
- Menentukan segmentasi aset keuangan yang sejenis untuk perhitungan cadangan kerugian penurunan nilai;
- Estimasi arus kas debitur dalam perhitungan individual *impairment*.

Lihat Catatan 2g untuk kebijakan akuntansi atas penurunan nilai aset keuangan.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS (continued)

Management makes estimates and assumptions that affect the reported amounts of assets and liabilities within the next financial year. All estimates and assumptions required in conformity with SFAS are best estimates undertaken in accordance with the applicable standard. Estimates and judgements are evaluated on a continuous basis, and are based on past experience and other factors, including expectations with regard to future events.

Although these estimates and assumption are based on management's best knowledge of current events and activities, actual result may differ from those estimates and assumption.

Allowance for impairment losses of financial assets

According to SFAS 71, the measurement of the expected credit loss allowance for financial assets measured at amortised cost and at fair value through other comprehensive income is an area that requires the use of complex models and significant assumptions about future economic conditions and credit behavior.

Significant estimates are required in applying the SFAS 71 requirements for measuring allowance for impairment losses, such as:

- *Determining criteria for significant increase in Credit Risk;*
- *Choosing appropriate models and assumptions for the measurement of allowance for impairment losses;*
- *Establishing the number and relative weightings of forward-looking scenarios for each type of segment/product;*
- *Establishing groups of similar financial assets for the purposes of measuring allowance for impairment losses;*
- *Estimate debtor's cash flow in the calculation of individual impairment.*

Refer to Note 2g for accounting policy on impairment of financial assets.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Cadangan kerugian penurunan nilai atas aset produktif (untuk Entitas Anak berbasis syariah)

Aset produktif terdiri dari giro pada Bank Indonesia dan penempatan pada Bank Indonesia dalam bentuk Fasilitas Simpanan Bank Indonesia Syariah ("FASBIS"), giro pada bank lain, penempatan pada bank lain, investasi pada efek-efek, pembiayaan *mudharabah*, pembiayaan *musyarakah*, aset yang diperoleh untuk *ijarah*, serta komitmen dan kontinjensi yang berisiko kredit.

Sesuai dengan Peraturan Bank Indonesia ("PBI"), Bank mengklasifikasikan aset produktif ke dalam satu dari lima kategori dan aset nonproduktif ke dalam satu dari empat kategori. Aset produktif tidak bermasalah (*performing*) diklasifikasikan sebagai "Lancar" dan "Dalam Perhatian Khusus", sedangkan aset produktif bermasalah (*non-performing*) diklasifikasikan kedalam tiga kategori yaitu: "Kurang Lancar", "Diragukan" dan "Macet". Kategori untuk aset non-produktif terdiri dari "Lancar", "Kurang Lancar", "Diragukan" dan "Macet".

Penilaian kualitas aset bank umum berdasarkan prinsip syariah diatur dalam Peraturan Otoritas Jasa Keuangan ("POJK") No.19/POJK.03/2018 tanggal 20 September 2018 tentang "Penilaian Kualitas Aset Bank Umum Syariah dan Unit Usaha Syariah".

Agunan yang diambil alih

Agunan yang diambil alih diukur sebesar nilai yang lebih rendah antara nilai tercatat dan nilai bersih yang dapat direalisasi. Nilai bersih yang dapat direalisasi adalah nilai wajar agunan yang diambil alih dikurangi dengan estimasi biaya untuk menjual agunan tersebut. Selisih lebih saldo kredit di atas nilai bersih yang dapat direalisasi dari agunan yang diambil alih dibebankan ke dalam akun cadangan kerugian penurunan nilai aset non keuangan.

Kondisi agunan yang diambil alih dievaluasi secara individu berdasarkan estimasi terbaik manajemen atas nilai kini arus kas yang diharapkan akan diterima. Dalam mengestimasi nilai bersih yang dapat direalisasi tersebut, manajemen membuat pertimbangan berdasarkan nilai realisasi bersih dari setiap agunan berdasarkan hasil penilaian dari penilai independen dan estimasi waktu dan arus kas yang diterima dari penjualan aset tersebut. Setiap aset yang mengalami penurunan nilai dinilai sesuai dengan kondisi, dan strategi penyelesaian serta estimasi arus kas yang diperkirakan dapat diterima.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS (continued)

Allowance for impairment losses on earning assets (for Subsidiary with Sharia principle)

Earning assets consist of current accounts with Bank Indonesia, placements with Bank Indonesia in the form of Bank Indonesia Sharia Deposit Facilities ("FASBIS"), current accounts with other banks, placements with other banks, marketable securities, mudharabah and musyarakah financing, assets acquired for ijarah, and commitments and contingencies which carry credit risk.

In accordance with Bank Indonesia Regulations ("PBI"), the Bank classifies earning assets into one of five categories and non-earning assets into one of four categories. Performing earning assets categorised as "Current" and "Special Mention", while non-performing earning assets are categorised into three categories: "Substandard", "Doubtful", and "Loss". Non-Earning assets are divided into "Current", "Substandard", "Doubtful", and "Loss".

The assessment of asset quality of commercial banks under sharia principle is regulated by Otoritas Jasa Keuangan Regulations ("POJK") No.19/POJK.03/2018 dated September 20, 2018 regarding "Assessment of the Quality of Assets of Sharia Commercial Bank and Sharia Business Unit".

Foreclosed assets

Foreclosed assets are stated at lower amount of carrying amount and net realisable value. Net realisable value is the fair value of the foreclosed assets less the estimated costs to sell the assets. The excess of loan receivable over the net realisable value of the foreclosed assets is charged to allowance for impairment losses on non financial assets.

The specific condition of foreclosed assets is individually evaluated based on management's best estimate of the present value of the expected cash flows to be received. In estimating these cash flows, management makes judgements about the net realisable value of each foreclosed asset based the result of independent appraisal and estimated time and cash received from selling the foreclosed assets. Each impaired assets will be measured based on its merits, and the workout strategy and estimated cash flows considered recoverable.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Imbalan kerja karyawan

Nilai kini atas imbalan kerja karyawan tergantung dari banyaknya faktor yang dipertimbangkan oleh aktuaris berdasarkan beberapa asumsi. Perubahan atas asumsi-asumsi tersebut akan mempengaruhi nilai tercatat atas imbalan kerja karyawan.

Asumsi yang digunakan dalam menentukan biaya atau pendapatan untuk imbalan kerja termasuk tingkat diskonto. Bank menentukan tingkat diskonto yang tepat pada setiap akhir tahun. Ini merupakan tingkat suku bunga yang digunakan untuk menentukan nilai kini atas arus kas masa depan yang diestimasi akan digunakan untuk membayar imbalan kerja. Dalam menentukan tingkat diskonto yang tepat, Bank mempertimbangkan tingkat suku bunga atas Obligasi Pemerintah yang mempunyai jatuh tempo yang menyerupai jangka waktu imbalan kerja karyawan.

Asumsi kunci liabilitas pensiun lainnya sebagian ditentukan berdasarkan kondisi pasar saat ini (lihat Catatan 24).

Penentuan nilai wajar

Dalam menentukan nilai wajar atas aset keuangan dan liabilitas keuangan dimana tidak terdapat harga pasar yang dapat diobservasi, Bank harus menggunakan teknik penilaian seperti dijelaskan pada Catatan 2d.

Informasi mengenai penentuan nilai wajar dari instrumen keuangan diungkapkan pada Catatan 46.

Dalam mengukur nilai wajar atas aset dan liabilitas non-keuangan, Bank menggunakan data pasar yang dapat diobservasi jika memungkinkan.

Perpajakan

Pertimbangan signifikan dilakukan dalam menentukan provisi atas pajak penghasilan badan dan pajak lainnya. Terdapat transaksi dan perhitungan tertentu yang penentuan pajak akhirnya adalah tidak pasti dalam kegiatan usaha normal. Bank mengakui liabilitas pajak penghasilan badan dan pajak lainnya berdasarkan estimasi apakah akan terdapat tambahan pajak penghasilan badan dan pajak lainnya.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS (continued)

Employee benefit

The present value of the employee benefit obligations depends on a number of factors that are determined on an actuarial basis using a number of assumptions. Any changes in these assumptions will impact the carrying amount of employee benefit obligations.

The assumptions used in determining the net cost (income) for employee benefits include the discount rate. The Bank determines the appropriate discount rate at the end of each year. This is the interest rate that should be used to determine the present value of estimated future cash outflows expected to be required to settle the pension obligations. In determining the appropriate discount rate, the Bank considers the interest rates of Government Bonds that have terms to maturity approximating the terms of the related employee benefit liability.

Other key assumptions for pension obligations are partly based on current market conditions (refer to Note 24).

Determining fair values

The determining of fair value for financial assets and financial liabilities for which there is no observable market price requires the Bank must use of valuation techniques as described in Note 2d.

Information about the determination of fair value of financial instruments is disclosed in Note 46.

When measuring the fair value for non-financial assets and liabilities, the Bank uses observable market data to extent possible.

Taxation

Significant consideration is made in determining the provision of corporate income tax and other taxes. There are certain transactions and calculations that the final tax determination is uncertain in the normal course of business. The Bank recognised liability for corporate income tax and other taxes based on an estimate whether there would be an additional corporate income tax and other taxes.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Aset Pajak Tangguhan

Aset pajak tangguhan diakui atas seluruh perbedaan temporer yang dapat dikurangkan, sepanjang besar kemungkinannya bahwa penghasilan kena pajak akan tersedia sehingga perbedaan temporer tersebut dapat digunakan. Estimasi signifikan oleh manajemen disyaratkan dalam menentukan jumlah aset pajak tangguhan yang dapat diakui, berdasarkan saat penggunaan dan tingkat penghasilan kena pajak serta strategi perencanaan pajak masa depan.

Menentukan jangka waktu kontrak dengan opsi perpanjangan dan penghentian kontrak - Bank sebagai *lessee*

Bank menentukan jangka waktu sewa sebagai jangka waktu sewa yang tidak dapat dibatalkan, bersama dengan periode yang dicakup oleh opsi untuk memperpanjang masa sewa jika dipastikan akan dilaksanakan, atau periode apa pun yang dicakup oleh opsi untuk menghentikan sewa, jika cukup wajar untuk tidak dilakukan.

Bank memiliki beberapa kontrak sewa yang mencakup opsi perpanjangan dan penghentian jangka waktu sewa. Bank menerapkan penilaian dalam mengevaluasi apakah dapat dipastikan jika akan menggunakan opsi untuk memperpanjang atau menghentikan sewa. Hal tersebut dilakukan dengan mempertimbangkan seluruh fakta dan keadaan yang relevan yang memberikan insentif ekonomi untuk melakukan perpanjangan atau penghentian sewa. Setelah tanggal dimulainya, Bank menilai kembali masa sewa, jika terdapat peristiwa atau perubahan signifikan dalam keadaan yang berada dalam kendali dan mempengaruhi apakah *lessee* cukup pasti untuk mengeksekusi opsi memperpanjang atau menghentikan sewa.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS (continued)

Deferred tax assets

Deferred tax assets are recognised for all deductible temporary differences, as long as it is likely that taxable income will be available so that the temporary differences can be utilised. Significant estimates by management are required in determining the amount of deferred tax assets that can be recognised, based on utilisation and the level of taxable income and future tax planning strategies.

Determine the contract term with options for extension and termination of the contract - the Bank as lessee

The Bank determines the lease term as the term of the lease that cannot be cancelled, together with the period covered by the option to extend the lease if it is determined to be exercised, or any period covered by the option to terminate the lease, if it is reasonably reasonable not to do so.

The Bank has several lease contracts that include options for extension and termination of the lease terms. The Bank applies its judgment in evaluating whether it is certain to exercise the option to extend or terminate the lease. This is done by considering all relevant facts and circumstances that provide economic incentives to extend or terminate the lease. After the commencement date, the Bank reassesses the lease term, if there is a significant event or change in circumstances which is under its control and affects whether the lessee is certain enough to exercise the option to extend or terminate the lease.

4. KAS / *4. CASH*

	31 Desember/*December 31*,		
	2023	2022	
Kas dalam khasanah			*Cash in vault*
Rupiah	87.502.996	40.512.092	*Rupiah*
Mata uang asing			*Foreign currency*
Dolar Amerika Serikat	4.394.381	10.922.546	*United States Dollar*
Dolar Singapura	554.825	107.907	*Singapore Dollar*
Dolar Australia	171.699	110.013	*Australian Dollar*
Poundsterling Inggris	26.300	-	*Great Britain Poundsterling*
Euro Eropa	25.302	52.232	*European Euro*
Dolar Selandia Baru	22.851	8.176	*New Zealand Dollar*
Franc Swiss	7.869	10.601	*Swiss Franc*
Dolar Taiwan	7.704	34.569	*New Taiwan Dollar*
Dolar Hongkong	5.892	29.689	*Hongkong Dollar*

4. KAS (lanjutan) / *4. CASH (continued)*

	31 Desember/*December 31*,		
	2023	**2022**	
Kas dalam khasanah (lanjutan)			*Cash in vault (continued)*
Mata uang asing (lanjutan)			*Foreign currency (continued)*
Yen Jepang	4.682	8.247	*Japanese Yen*
Yuan Cina	2.341	2.931	*Chinese Yuan*
Won Korea	1.497	988	*Korean Won*
Real Saudi	1.437	-	*Saudi Riyal*
Dolar Kanada	581	6.892	*Canadian Dollar*
Baht Thailand	571	370	*Thailand Baht*
Ringgit Malaysia	436	371	*Malaysian Ringgit*
Kas	89.500	89.500	*Cash on hand*
Jumlah	**92.820.864**	**51.897.124**	***Total***

Kas dalam khasanah diasuransikan terhadap seluruh risiko kepada PT Victoria Insurance (pihak berelasi) dengan nilai pertanggungan seluruhnya pada tanggal 31 Desember 2023 dan 2022 masing-masing sebesar Rp125.921.618 dan Rp126.781.903. Manajemen Bank berpendapat bahwa nilai pertanggungan tersebut telah memadai untuk menutup kemungkinan kerugian atas kas dalam khasanah yang dipertanggungkan.

Cash in vault, are insured against losses by all risks to PT Victoria Insurance (related party) with total insurance coverage as of December 31, 2023 and 2022 amounting to Rp125,921,618 and Rp126,781,903, respectively. The Bank's management believe that the insurance coverage is adequate to cover possible losses on insured cash in vault.

5. GIRO PADA BANK INDONESIA / *5. CURRENT ACCOUNTS WITH BANK INDONESIA*

	31 Desember/*December 31*,		
	2023	**2022**	
Rupiah	1.469.773.490	1.490.535.993	*Rupiah*
Dolar Amerika Serikat	23.303.360	16.029.855	*United States Dollar*
Jumlah	**1.493.076.850**	**1.506.565.848**	***Total***

Rasio GWM Bank yang telah diaudit pada tanggal 31 Desember 2023 dan 2022 adalah sebagai berikut:

As of December 31, 2023 and 2022, the audited GWM ratios of the Bank are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Bank Umum - Konvensional			***Commercial Bank - Conventional***
Rupiah			*Rupiah*
Giro Wajib Minimum*)	7,32%	7,69%	*Minimum Statutory Reserve*)
Penyangga Likuiditas Makroprudensial**)	23,73%	22,82%	*Macroprudential Liquidity Buffer***)
GWM Rasio Intermediasi Makroprudensial***)	(1,01%)	(2,49%)	*GWM Macroprudential Intermediation Ratio****)
Valuta Asing	4,05%	4,05%	*Foreign Currencies*

*) Sebelumnya Giro Wajib Minimum Primer — *Previously Primary Minimum Statutory Reserve* *)
**) Sebelumnya Giro Wajib Minimum Sekunder — *Previously Secondary Minimum Statutory Reserve* **)
***) Sebelumnya Giro Wajib Minimum LFR — *Previously Loan to Funding Ratio Minimum Statutory Reserve* ***)

5. GIRO PADA BANK INDONESIA (lanjutan)

Saldo giro pada Bank Indonesia adalah untuk memenuhi persyaratan Giro Wajib Minimum (GWM) dari Bank Indonesia.

Berdasarkan Peraturan Bank Indonesia (PBI) No. 20/3/PBI/2018 tanggal 29 Maret 2018 sebagaimana telah beberapa kali diubah, terakhir dengan PBI No. 24/4/PBI/2022 tanggal 1 Maret 2022 tentang Perubahan Keempat atas Peraturan Bank Indonesia No. 20/3/PBI/2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah; Peraturan Anggota Dewan Gubernur (PADG) No. 20/10/PADG/2018 tanggal 31 Mei 2018, sebagaimana telah diubah beberapa kali, terakhir dengan PADG No. 24/3/PADG/2022 tanggal 1 Maret 2022 tentang Perubahan Kedelapan atas Peraturan Anggota Gubernur No. 20/10/PADG/2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah; dan Peraturan Anggota Dewan Gubernur (PADG) No. 24/8/PADG/2022 tanggal 1 Juli 2022, sebagaimana telah diubah beberapa kali, terakhir dengan PADG No. 12 Tahun 2023 tanggal 1 Oktober 2023 tentang Perubahan Kedua atas Peraturan Anggota Dewan Gubernur Nomor 24/8/PADG/2022 tentang Peraturan Pelaksanaan Pemenuhan Giro Wajib Minimum Dalam Rupiah dan Valuta Asing Bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah. Bank wajib memenuhi rasio Giro Wajib Minimum (GWM) seperti yang disyaratkan Bank Indonesia dalam Rupiah dan valuta asing secara harian dan rata-rata dari rata-rata Dana Pihak Ketiga (DPK) dalam Rupiah dan valuta asing selama periode laporan tertentu.

Pada tanggal 31 Desember 2023 dan 2022, rasio GWM rata-rata dalam Rupiah yang wajib dipenuhi adalah sebesar 9%, dan rasio GWM rata-rata dalam valuta asing yang wajib dipenuhi sebesar 4%.

Berdasarkan surat dari Bank Indonesia (BI) No. 25/321/DKMP/Srt/B tanggal 5 Desember 2023, Bank memperoleh Insentif Kebijakan Likuiditas Makroprudensial (KLM) sebesar 1,8% berlaku dari 1 Desember 2023 sampai dengan 29 Februari 2024 sehingga GWM rata-rata dalam Rupiah yang wajib dipenuhi oleh Bank adalah 7,2%.

5. CURRENT ACCOUNTS WITH BANK INDONESIA (continued)

Current accounts with Bank Indonesia are provided to fulfill Bank Indonesia's requirements on Minimum Reserve Requirements (GWM).

In accordance with Bank Indonesia Regulation (PBI) No. 20/3/PBI/2018 dated March 29, 2018 as amended several times, most recently with PBI No. 24/4/PBI/2022 dated March 1, 2022 concerning the Fourth Amendment to Bank Indonesia Regulation No. 20/3/PBI/2018 concerning Statutory Reserves in Rupiah and Foreign Currency for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units; and Regulation of Members of the Board of Governors (PADG) No. 20/10/PADG/2018 dated May 31, 2018, as amended several times, most recently with PADG No. 24/3/PADG/2022 dated March 1, 2022 concerning the Eighth Amendment to the Regulation of Members of the Governor No. 20/10/PADG/2018 concerning Statutory Reserves in Rupiah and Foreign Exchange for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units, Regulation of Members of the Board of Governors (PADG) No. 24/8/PADG/2022 dated July 1, 2022, as amended several times, most recently with PADG No. 12 year 2023 dated October 1, 2023 concerning the Second Amendment to the Regulation of Members of the Board of Governors PADG No. 24/8/PADG/2022 concerning the Implementation Regulations for Fulfillment of Statutory Reserves in Rupiah and Foreign Exchange for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units. Banks are required to meet the Statutory Reserves (GWM) ratio as required by Bank Indonesia in Rupiah and foreign currencies on a daily basis and the average of the average Third Party Funds (DPK) in Rupiah and foreign currencies during a specific reporting period.

As of December 31, 2023 and 2022, the average GWM ratio in Rupiah that must be fulfilled is at 9%, and the average GWM ratio in foreign currencies that must be fulfilled is at 4%.

Based on letter from Bank Indonesia (BI) No. 25/321/DKMP/Srt/B dated December 5, 2023, the Bank received a Macroprudential Liquidity Policy Incentive of 1.8% valid from December 1, 2023 until February 29, 2024 therefore GWM ratio in Rupiah that must be fulfilled by the Bank is at 7.2%.

5. GIRO PADA BANK INDONESIA (lanjutan)

Disamping itu, berdasarkan PBI No. 20/4/PBI/2018 tanggal 29 Maret 2018 sebagaimana telah beberapa kali diubah, terakhir dengan PBI No.24/16/PBI/2022 tanggal 1 November 2022 tentang Perubahan Keempat atas Peraturan Bank Indonesia No. 20/4/PBI/2018 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudential bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah dan PADG No.21/22/PADG/2019 tanggal 28 November 2019 sebagaimana telah mengalami beberapa kali perubahan, terakhir dengan PADG No. 18 Tahun 2023 tanggal 29 November 2023 tentang Perubahan Ketujuh atas Peraturan Anggota Dewan Gubernur No. 21/22/PADG/2019 tentang Rasio Intermediasi Makroprudential dan Penyangga Likuiditas Makroprudential bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah, Bank wajib memenuhi Rasio Intermediasi Makroprudential (RIM) dan Penyangga Likuiditas Makroprudential (PLM) dari rata-rata DPK dalam Rupiah selama periode laporan tertentu.

Pada tanggal 31 Desember 2023 dan 2022, rasio PLM yang wajib dipenuhi minimal masing-masing sebesar 5% dan 6%.

Giro RIM adalah tambahan simpanan minimum yang wajib dipelihara oleh Bank dalam bentuk saldo rekening giro pada Bank Indonesia. Parameter yang digunakan dalam pemenuhan giro RIM adalah sebagai berikut:

1. Batas bawah target RIM sebesar 84%
2. Batas atas target RIM sebesar 94%
3. KPMM Insentif sebesar 14%

Bank memiliki RIM dibawah batas bawah target RIM, NPL kurang dari 5 (Catatan 11), dan KPMM diatas 19% sehingga Bank wajib memelihara Giro RIM menggunakan parameter disinsentif yang berlaku. Pada tanggal 31 Desember 2023 dan 2022, Giro RIM yang dimiliki Bank telah memenuhi ketentuan Bank Indonesia.

Bank telah memenuhi peraturan Bank Indonesia yang berlaku tentang Giro Wajib Minimum bank umum konvensional pada tanggal 31 Desember 2023 dan 2022.

5. CURRENT ACCOUNTS WITH BANK INDONESIA (continued)

Furthermore, based on PBI No. 20/4/PBI/2018 dated March 29, 2018 as amended several times, most recently with PBI No.24/16/PBI/2022 dated November 1, 2022 concerning the Fourth Amendment to Bank Indonesia Regulation No. 20/4/PBI/2018 concerning Ratio Macroprudential Intermediation and Macroprudential Liquidity Support for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units; and PADG No.21/22/PADG/2019 dated November 28, 2019 as amended several times, most recently with PADG No. 18 year 2023 dated November 29, 2023 concerning the Seventh Amendment to the Regulation of Members of the Board of Governors No. 21/22/PADG/2019 concerning Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units, Banks must meet the Macroprudential Intermediation Ratio (RIM) and Macroprudential Liquidity Buffer (PLM) of the average TPF in Rupiah during specific reporting periods.

As of December 31, 2023 and 2022, the minimum of PLM ratio that must be fulfilled is set at 5% and 6%, respectively.

RIM demand deposits is the additional reserve that should be maintained by the Bank in the form of current accounts with Bank Indonesia. The parameters used in the fulfillment of MIR are as follow:

1. *Minimum target of RIM is 84%*
2. *Maximum target of RIM is 94%*
3. *Incentive of CAR is 14%*

Bank have RIM below the lower RIM target limit, NPL of less than 5 (Note 11), and have CAR above 19% therefore the Bank is required to maintain RIM demand deposits using the applicable disincentive parameters. As of December 31, 2023 and 2022, the RIM Current Account owned by the Bank complied with the applicable Bank Indonesia regulations.

The Bank has fulfilled the prevailing Bank Indonesia's regulation regarding Minimum Reserve Requirements for conventional banks as of December 31, 2023 and 2022.

6. GIRO PADA BANK LAIN / *6. CURRENT ACCOUNTS WITH OTHER BANKS*

a. Berdasarkan bank / *a. By bank*

	31 Desember/*December 31*,		
	2023	**2022**	
Rupiah			***Rupiah***
PT Bank Central Asia Tbk	57.345.205	31.369.908	*PT Bank Central Asia Tbk*
PT Bank Negara Indonesia (Persero) Tbk	20.963.477	18.116.185	*PT Bank Negara Indonesia (Persero) Tbk*
PT Bank Mandiri (Persero) Tbk	10.101.400	10.100.200	*PT Bank Mandiri (Persero) Tbk*
PT Bank Permata Tbk	174.099	230.617	*PT Bank Permata Tbk*
PT Bank HSBC Indonesia	57.491	-	*PT Bank HSBC Indonesia*
PT Bank Maybank Indonesia Tbk	31.338	1.860.483	*PT Bank Maybank Indonesia Tbk*
PT Bank Pan Indonesia Tbk	8.318	9.763	*PT Bank Pan Indonesia Tbk*
PT Bank CIMB Niaga Tbk	3.769	248.783	*PT Bank CIMB Niaga Tbk*
PT Bank Mega Tbk	-	622.877	*PT Bank Mega Tbk*
PT Bank DBS Indonesia	-	455.792	*PT Bank DBS Indonesia*
PT Bank Victoria Syariah	-	915	*PT Bank Victoria Syariah*
Sub jumlah	**88.685.097**	**63.015.523**	***Sub total***
Mata Uang Asing			***Foreign Currency***
PT Bank Negara Indonesia (Persero) Tbk	164.890.420	106.390.516	*PT Bank Negara Indonesia (Persero) Tbk*
PT Bank Mandiri (Persero) Tbk	36.106.642	28.621.665	*PT Bank Mandiri (Persero) Tbk*
PT Bank Central Asia Tbk	4.651.092	22.602.699	*PT Bank Central Asia Tbk*
PT Bank CIMB Niaga Tbk	1.059.270	2.599.773	*PT Bank CIMB Niaga Tbk*
PT Bank ICBC	577.714	-	*PT Bank ICBC*
OCBC Bank, Singapura	328.684	5.154.251	*OCBC Bank, Singapore*
Sub jumlah	**207.613.822**	**165.368.904**	***Sub total***
Jumlah	**296.298.919**	**228.384.427**	***Total***
Dikurangi: Cadangan Kerugian Penurunan Nilai	(1.726)	-	*Less: Allowance for impairment losses*
Jumlah - bersih	**296.297.193**	**228.384.427**	***Total - net***

Pada tanggal 31 Desember 2023 dan 2022, tidak terdapat giro pada bank lain yang dijaminkan.

As of December 31, 2023 and 2022, there are no current accounts with other banks pledged as collateral.

b. Berdasarkan mata uang / *b. By currency*

	31 Desember/*December 31*,		
	2023	**2022**	
Rupiah	88.685.097	63.015.523	*Rupiah*
Dolar Amerika Serikat	202.908.447	154.903.119	*United States Dollar*
Yen Jepang	2.673.710	2.672.405	*Japanese Yen*
Euro Eropa	1.059.270	2.599.773	*European Euro*
China Yuan	643.711	39.356	*Chinese Yuan*
Dolar Singapura	328.684	5.154.251	*Singapore Dollar*
Jumlah	**296.298.919**	**228.384.427**	***Total***
Dikurangi: Cadangan Kerugian Penurunan Nilai	(1.726)	-	*Less: Allowance for impairment losses*
Jumlah - bersih	**296.297.193**	**228.384.427**	***Total - net***

6. GIRO PADA BANK LAIN (lanjutan)

c. Berdasarkan kolektibilitas sesuai Peraturan Bank Indonesia

Pada tanggal 31 Desember 2023 dan 2022, semua giro pada bank lain diklasifikasikan lancar.

d. Cadangan kerugian penurunan nilai

Pada tanggal 31 Desember 2023 dan 2022, seluruh giro pada bank lain berada di *stage* 1. Bank telah membentuk cadangan kerugian penurunan nilai masing-masing sebesar Rp1.726 dan RpNihil.

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

6. CURRENT ACCOUNTS WITH OTHER BANKS (continued)

c. By collectibility according to Bank Indonesia Regulation

All current accounts with other banks are classified as current as of December 31, 2023 and 2022.

d. Allowance for impairment losses

As of December 31, 2023 and 2022, all current accounts with other banks are classified in stage 1. Bank has set aside allowance for impairment losses amounted to Rp1,726 and RpNil, respectively.

Management believes that the above allowance for impairment losses is adequate.

7. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN

a. Berdasarkan jenis, pihak dan bank

7. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS

a. By type, counterparties and bank

	31 Desember/*December 31*,		
	2023	**2022**	
Pihak ketiga			***Third party***
Fasilitas Simpanan			*Fasilitas Simpanan*
Bank Indonesia (FASBI)	359.947.530	829.890.530	*Bank Indonesia (FASBI)*
Deposito Berjangka			*Time Deposit*
PT Bank Mega Tbk	2.600.000	-	*PT Bank Mega Tbk*
PT Bank Victoria Syariah	1.800.000	-	*PT Bank Victoria Syariah*
PT Bank Nationalnobu Tbk	1.320.000	-	*PT Bank Nationalnobu Tbk*
PT Bank BJB Tbk	700.000	3.450.000	*PT Bank BJB Tbk*
PT Bank Tabungan Negara (Persero) Tbk	-	3.000.000	*PT Bank Tabungan Negara (Persero) Tbk*
PT Bank Panin Dubai Syariah Tbk	-	1.000.000	*PT Bank Panin Dubai Syariah Tbk*
PT Bank BJB Syariah	-	1.000.000	*PT Bank BJB Syariah*
	366.367.530	**838.340.530**	
Interbank Call Money			*Interbank Call Money*
Rupiah			***Rupiah***
PT Bank Capital Indonesia Tbk	250.000.000	-	*PT Bank Capital Indonesia Tbk*
PT Bank Victoria Syariah	150.000.000	20.000.000	*PT Bank Victoria Syariah*
PT Bank Pembangunan Daerah Papua	100.000.000	-	*PT Bank Pembangunan Daerah Papua*
PT Bank Nationalnobu Tbk	50.000.000	-	*PT Bank Nationalnobu Tbk*
	550.000.000	**20.000.000**	
Jumlah	**916.367.530**	**858.340.530**	***Total***
Dikurangi: Cadangan Kerugian Penurunan Nilai	(998.782)	(13.015)	*Less: Allowance for impairment losses*
Jumlah - bersih	**915.368.748**	**858.327.515**	***Total - net***

7. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN (lanjutan)

a. Berdasarkan jenis, pihak dan bank (lanjutan)

Pada tanggal 31 Desember 2023 dan 2022, tidak terdapat penempatan Bank Indonesia dan pada bank lain yang dijaminkan.

7. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS (continued)

a. By type, counterparties and bank (continued)

As of December 31, 2023 and 2022, there are no placements Bank Indonesia and with other banks pledged as collateral.

b. Berdasarkan tenor jatuh tempo / *b. By period maturity*

	31 Desember/*December 31*,		
	2023	**2022**	
Kurang dari 1 bulan	916.367.530	858.340.530	*Less than 1 month*
1 sampai 3 bulan	-	-	*1 up to 3 months*
3 sampai 6 bulan	-	-	*3 up to 6 months*
Lebih dari 6 bulan	-	-	*More than 6 months*
Jumlah	**916.367.530**	**858.340.530**	***Total***
Dikurangi: Cadangan Kerugian Penurunan Nilai	(998.782)	(13.015)	*Less: Allowance for impairment losses*
Jumlah - bersih	**915.368.748**	**858.327.515**	***Total - net***

c. Berdasarkan mata uang / *c. By currency*

	31 Desember/*December 31*,		
	2023	**2022**	
Rupiah	916.367.530	858.340.530	*Rupiah*
Dolar Amerika Serikat	-	-	*United States Dollar*
Jumlah	**916.367.530**	**858.340.530**	***Total***
Dikurangi: Cadangan Kerugian Penurunan Nilai	(998.782)	(13.015)	*Less: Allowance for impairment losses*
Jumlah - bersih	**915.368.748**	**858.327.515**	***Total - net***

d. Berdasarkan kolektibilitas sesuai Peraturan Bank Indonesia

Pada tanggal 31 Desember 2023 dan 2022, seluruh penempatan pada Bank Indonesia dan bank lain digolongkan sebagai lancar.

d. By collectability according to Bank Indonesia Regulation

As of December 31, 2023 and 2022, all placements with Bank Indonesia and other banks are classified as current.

7. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN (lanjutan)

e. Cadangan kerugian penurunan nilai

Pada tanggal 31 Desember 2023 dan 2022 seluruh penempatan pada Bank Indonesia dan bank lain berada di *stage* 1. Bank telah membentuk cadangan kerugian penurunan nilai masing-masing sebesar Rp998.782 dan Rp13.015.

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

7. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS (continued)

e. Allowance for impairment losses

As of December 31, 2023 and 2022, all placements in Bank Indonesia and other banks are classified in stage 1. Bank has set aside allowance for impairment losses amounted to Rp998,782 and Rp13,015, respectively.

Management believes that the above allowance for impairment losses is adequate.

8. EFEK-EFEK

a. Berdasarkan jenis

8. MARKETABLE SECURITIES

a. By type

	31 Desember/*December 31*,		
	2023	**2022**	
Rupiah			***Rupiah***
Nilai wajar melalui laba rugi			***Fair value through profit or loss***
Reksadana	790.570.315	400.037.154	*Mutual funds*
Wesel jangka menengah	221.960.000	172.625.000	*Medium-term notes*
Sub jumlah	**1.012.530.315**	**572.662.154**	***Sub total***
Nilai wajar melalui penghasilan komprehensif lain			***Fair value through other comprehensive income***
Surat Utang Negara	757.213.466	1.095.239.462	*Government Promissory Notes*
Surat Berharga Syariah Negara	308.245.034	387.126.664	*Government Sharia Bonds*
Reksadana	306.932.232	-	*Mutual funds*
Surat Berharga Syariah Korporasi	20.283.400	-	*Corporate Sharia Bonds*
Obligasi korporasi	12.081.667	83.372.315	*Corporate bonds*
Efek Beragun Aset	8.508.012	-	*Asset-backed security*
Wesel jangka menengah	-	20.547.800	*Medium-term notes*
Sub jumlah	**1.413.263.811**	**1.586.286.241**	***Sub total***
Biaya perolehan diamortisasi			***Amortised cost***
Surat Utang Negara	3.547.973.017	2.476.659.061	*Government Promissory Notes*
Obligasi korporasi	213.394.630	12.500.000	*Corporate bonds*
Reksadana	73.000.000	-	*Mutual funds*
Wesel Jangka Menengah	15.000.000	15.000.000	*Medium-term notes*
Sekuritas Rupiah Bank Indonesia (SRBI)	9.389.041	-	*Bank Indonesia Rupiah Securities (SRBI)*
Surat Berharga Syariah Negara	1.012.922	155.445.941	*Government Sharia Bonds*
Sub jumlah	**3.859.769.610**	**2.659.605.002**	***Sub total***
Jumlah	**6.285.563.736**	**4.818.553.397**	***Total***
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(8.271.969)	(8.862.949)	*Allowance for impairment losses*
Jumlah - bersih	**6.277.291.767**	**4.809.690.448**	***Total - net***

8. EFEK-EFEK (lanjutan)

a. Berdasarkan jenis (lanjutan)

Pada tanggal 31 Desember 2023 dan 2022, tidak terdapat efek-efek yang dijaminkan.

Pada tanggal 31 Desember 2023 dan 2022, terdapat surat utang negara dalam transaksi efek-efek yang dijual dengan janji untuk dibeli kembali dengan nilai nominal sebesar Rp643.266.730 dan Rp240.865.160 (Catatan 20).

b. Obligasi korporasi

i. Nilai wajar melalui penghasilan komprehensif lain

8. MARKETABLE SECURITIES (continued)

a. By type (continued)

As of December 31, 2023 and 2022, there are no marketable securities pledged as collateral.

As of December 31, 2023 and 2022 government bonds under transaction securities sold under repurchase agreement with nominal amount of Rp643,266,730 and Rp240,865,160 (Notes 20).

b. Corporate bonds

i. Fair value through other comprehensive income

31 Desember/*December 31*, 2023

Pihak penerbit/ *Issuers*	Obligasi/ *Bonds*	Jumlah/ *Amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal jatuh tempo/ *Maturity date*	Peringkat/ *Rating*
PT Astra Sedaya Finance	Obligasi Berkelanjutan IV/III 2019 C	10.080.856	7,95	23-Oct-24	idAAA
PT Aneka Gas Industri Tbk	Obligasi Berkelanjutan II Tahap IV 2021 A	2.000.811	8,10	22-Dec-24	A(idn)
Jumlah/ *Total*		**12.081.667**			

31 Desember/*December 31*, 2022

Pihak penerbit/ *Issuers*	Obligasi/ *Bonds*	Jumlah/ *Amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal jatuh tempo/ *Maturity date*	Peringkat/ *Rating*
PT Aneka Gas Industri Tbk	Obligasi Berkelanjutan II/III 2021 C	1.992.434	8,10	22-Dec-24	A(idn)
PT Astra Sedaya Finance	ASDF Berkel IV/IV 2020 B	10.043.076	7,00	27-Mar-23	idAAA
PT Astra Sedaya Finance	ASDF Berkl IV/III 2019 C	10.286.281	7,95	23-Oct-24	idAAA
PT Bank Tabungan Negara (Persero) Tbk	BTN Berkl I/II Th 2013	19.095.135	7,90	27-Mar-23	AA(idn)
PT Mayora Indah Tbk	Mayora Indah I/III 2018	15.107.999	8,15	24-Apr-23	idAA
PT Sarana Multigriya Finansial (Persero)	EBA-SP SMF-BTN03 KELAS A SERI A2	5.105.630	8,40	07-Jul-29	idAAA(sf)
PT Sarana Multigriya Finansial (Persero)	EBA-SP SMF-BTN05 KELAS A SERI A1	16.005.956	8,50	07-May-32	idAAA(sf)
PT Sarana Multigriya Finansial (Persero)	EBA-SP SMF-BTN05 KELAS A SERI A2	697.998	8,75	07-May-32	idAAA(sf)
PT Serasi Autoraya	OBL Berkelanjutan I Serasi Autoraya THP I 2019 C	5.037.806	8,35	27-Apr-23	AA-(idn)
Jumlah/*Total*		**83.372.315**			

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

b. Obligasi korporasi (lanjutan) / *b. Corporate bonds (continued)*

ii. Biaya perolehan diamortisasi / *ii. Amortised cost*

31 Desember/*December 31,* 2023

Pihak penerbit/ *Issuers*	Obligasi/ *Bonds*	Jumlah/ *Amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal jatuh tempo/ *Maturity date*	Peringkat/ *Rating*
Lembaga Pembiayaan Ekspor Indonesia	Obligasi Berkelanjutan III Tahap V Tahun 2017 Seri C	20.251.743	8,25	15-Agu-24	idAAA
Lembaga Pembiayaan Ekspor Indonesia	Obligasi Berkelanjutan IV Tahap IV Tahun 2019 Seri C	10.082.916	8,90	23-Apr-24	idAAA
PT Barito Pacific Tbk	Obligasi Berkelanjutan III Tahap I Tahun 2023 Seri B	15.000.000	9,25	08-Feb-28	idA+
PT Permodalan Nasional Madani (Persero)	Obligasi Berkelanjutan III Tahap II Tahun 2019 Seri B	20.395.649	8,75	28-Nov-24	idAA+
PT Global Mediacom Tbk	Obligasi Berkelanjutan IV Tahap I Tahun 2023 Seri B	16.955.601	10,25	06-Jul-26	idA+
PT Sarana Multigriya Financial Tbk (Persero)	Obligasi Berkelanjutan V Tahap IV Tahun 2020 Seri B	10.208.721	8,10	14-Jul-25	idAAA
PT Sinar Mas Multifinance	Obligasi Berkelanjutan III Tahap I Tahun 2023 Seri B	50.000.000	10,25	07-Feb-26	irA+
PT Sinar Mas Multifinance	Obligasi Berkelanjutan III TAHAP I Tahun 2023 Seri C	50.000.000	10,75	07-Feb-28	irA+
PT Sejahteraraya Anugrahjaya Tbk	Obligasi I Tahun 2022 Seri A	12.500.000	9,75	07-Okt-25	idA
PT TBS Energi Utama Tbk	Obligasi I Tahun 2023 Seri B	8.000.000	10,00	03-Mar-28	idA
Jumlah/*Total*		**213.394.630**			

31 Desember/*December 31,* 2022

Pihak penerbit/ *Issuers*	Obligasi/ *Bonds*	Jumlah/ *Amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal jatuh tempo/ *Maturity date*	Peringkat/ *Rating*
PT Sejahteraraya Anugrahjaya Tbk	OBLIGASI I SEJAHTERARAYA ANUGRAHJAYA TAHUN 2022 SERI A	12.500.000	9,75	7-Oct-25	idA
Jumlah/*Total*		**12.500.000**			

c. Berdasarkan sisa umur jatuh tempo / *c. By remaining period to maturity*

	31 Desember/*December 31*, 2023	31 Desember/*December 31*, 2022	
Diukur pada biaya perolehan diamortisasi			***Measured at amortised cost***
Kurang dari 1 tahun	731.735.232	428.488.131	*Less than 1 year*
1 sampai dengan 2 tahun	472.679.239	246.992.450	*1 up to 2 years*
2 sampai dengan 5 tahun	305.304.379	187.323.870	*2 up to 5 years*
Lebih dari 5 tahun	2.350.050.760	1.796.800.551	*More than 5 years*
Jumlah	**3.859.769.610**	**2.659.605.002**	***Total***

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

d. Berdasarkan kolektibilitas sesuai Peraturan Bank Indonesia / *d. By collectability as per Bank Indonesia*

	31 Desember/*December 31,*				
	2023		2022		
	Nilai tercatat/ *Carrying Value*	Cadangan/ *Allowance*	Nilai tercatat/ *Carrying Value*	Cadangan/ *Allowance*	
Lancar	6.285.563.736	(8.271.969)	4.818.553.397	(8.862.949)	*Current*
Kurang lancar	-	-	-	-	*Substandard*
Macet	-	-	-	-	*Loss*
Jumlah	**6.285.563.736**	**(8.271.969)**	**4.818.553.397**	**(8.862.949)**	***Total***

e. Perubahan cadangan kerugian penurunan nilai / *e. The changes in allowance for impairment losses*

Perubahan cadangan kerugian penurunan nilai efek-efek untuk tahun yang berakhir 31 Desember 2023 dan 2022 adalah sebagai berikut:

The changes in allowance for impairment losses on marketable securities for the year ended December 31, 2023 and 2022 are as follows:

	31 Desember/*December 31,* 2023				
	Stage 1	*Stage* 2	*Stage* 3	Jumlah/ *Total*	
Saldo awal tahun	**8.862.949**	**-**	**-**	**8.862.949**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	-	-	-	-	*Transfer to 12 month expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage 2*)	-	-	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	-	-	-	-	*Transfer to credit impaired (Stage 3)*
Perubahan bersih pada eksposur	(590.980)	-	-	(590.980)	*Net change in exposure*
Penghapusbukuan	-	-	-	-	*Write off*
Saldo akhir tahun	**8.271.969**	**-**	**-**	**8.271.969**	***Balance end of year***

	31 Desember/*December 31,* 2022					
	Stage 1	*Stage* 2	*Stage* 3	Syariah/ *Sharia*	Jumlah/ *Total*	
Saldo awal tahun	**11.108.843**	**-**	**-**	**-**	**11.108.843**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	-	-	-	-	-	*Transfer to 12 month expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage 2*)	-	-	-	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	-	-	-	-	-	*Transfer to credit impaired (Stage 3)*
Perubahan bersih pada eksposur	(2.245.894)	-	-	-	(2.245.894)	*Net change in exposure*
Penghapusbukuan	-	-	-	-	-	*Write off*
Saldo akhir tahun	**8.862.949**	**-**	**-**	**-**	**8.862.949**	***Balance end of year***

8. EFEK-EFEK (lanjutan)

e. Perubahan cadangan kerugian penurunan nilai (lanjutan)

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

8. MARKETABLE SECURITIES (continued)

e. The changes in allowance for impairment losses (continued)

Management believes that the above allowance for impairment losses is adequate.

9. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI

Efek-efek yang dibeli dengan janji dijual kembali pada tanggal 31 Desember 2023 dan 2022 adalah sebagai berikut:

9. SECURITIES PURCHASED UNDER RESALE AGREEMENTS

The securities purchased under resale agreements as of December 31, 2023 and 2022 are as follows:

31 Desember/*December 31,* 2023

Pihak lawan/ *Counterparty*	Jenis efek/ *Type of Securities*	Nilai wajar/ *Fair value amount*	Tingkat suku bunga/ *Interest rate*	Tanggal dimulai/ *Commencement date*	Tanggal jatuh tempo/ *Maturity date*	Nilai tercatat/ *Carrying amount*
Bank Mega	FR0080	123.206.041	6,35%	22 Desember/ *December* 2023	5 Januari/ *January 2024*	123.385.291
Bank Mega	FR0080	123.206.041	6,35%	22 Desember / *December* 2023	5 Januari / *January 2024*	123.385.291
Bank Mega	FR0080	123.206.041	6,35%	22 Desember / *December* 2023	5 Januari/ *January 2024*	123.385.291
Bank Mega	FR0080	123.206.041	6,35%	22 Desember / *December* 2023	5 Januari/ *January 2024*	123.385.291
Ina Perdana	FR0101	47.035.463	6,25%	28 Desember / *December* 2023	4 Januari / *January 2024*	47.730.463
Ina Perdana	FR0101	94.070.927	6,25%	28 Desember/ *December* 2023	4 Januari/ *January 2024*	95.460.927
Jumlah/ *Total*		**633.930.554**				**636.732.554**

31 Desember/*December 31,* 2022

Pihak lawan/ *Counterparty*	Jenis efek/ *Type of Securities*	Nilai wajar/ *Fair value amount*	Tingkat suku bunga/ *Interest rate*	Tanggal dimulai/ *Commencement date*	Tanggal jatuh tempo/ *Maturity date*	Nilai tercatat/ *Carrying amount*
Bank Indonesia	VR0046	119.045.000	5,50%	29 Desember/ *December* 2022	5 Januari/ *January 2023*	120.051.750
Bank Indonesia	VR0046	119.045.000	5,50%	29 Desember / *December* 2022	5 Januari / *January 2023*	120.051.750
Bank Indonesia	VR0035	118.276.625	5,50%	30 Desember / *December* 2022	6 Januari/ *January 2023*	119.567.375
Bank Indonesia	VR0035	118.276.625	5,50%	30 Desember / *December* 2022	6 Januari/ *January 2023*	119.567.375
Bank Indonesia	VR0035	118.276.625	5,50%	30 Desember / *December* 2022	6 Januari / *January 2023*	119.567.375
Ina Perdana	FR0075	119.251.625	5,80%	26 Desember / *December* 2022	2 Januari/ *January 2023*	120.313.375
Ina Perdana	FR0075	119.251.625	5,80%	26 Desember/ *December* 2022	2 Januari/ *January 2023*	120.313.375
Jumlah/ *Total*		**831.423.125**				**839.432.375**

Pada tanggal 31 Desember 2023 dan 2022, seluruh efek yang dibeli dengan janji dijual kembali digolongkan sebagai lancar dan berada di *stage* 1.

Manajemen berpendapat tidak diperlukan cadangan kerugian penurunan nilai pada tanggal 31 Desember 2023 dan 2022.

As of December 31, 2023 and 2022, all securities purchased under resale agreements were classified as current and are in stage 1.

Management believes that no allowance for impairment losses is required as of December 31, 2023 and 2022.

10. PENDAPATAN BUNGA DAN SYARIAH YANG MASIH AKAN DITERIMA / *10. INTEREST AND SHARIA INCOME RECEIVABLES*

	31 Desember/*December 31*,		
	2023	**2022**	
Pinjaman yang diberikan, pembiayaan dan piutang syariah	316.474.550	352.458.256	*Loans, sharia financing and receivables*
Efek-efek	68.397.055	63.314.972	*Marketable securities*
Surat-surat berharga yang dibeli dengan janji dijual kembali	969.990	452.257	*Securities purchased under resale agreements*
Penempatan pada Bank Indonesia dan bank lain	325.556	5.667	*Placements with Bank Indonesia and other banks*
Jumlah	**386.167.151**	**416.231.152**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(17.759.228)	(24.551.373)	*Less: Allowance for impairment loss*
Jumlah - bersih	**368.407.923**	**391.679.779**	***Total - net***

Mutasi cadangan kerugian penurunan nilai untuk pendapatan bunga dan syariah yang masih akan diterima adalah sebagai berikut:

The changes in allowance for impairment losses of interest and sharia income receivables are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Saldo awal	**24.551.373**	**21.829.912**	***Beginning balance***
Penambahan selama tahun berjalan (Catatan 32)	(3.814.474)	45.266.724	*Addition during the year (Note 32)*
Penghapusbukuan	(2.977.671)	(42.545.263)	*Write-off*
Saldo akhir	**17.759.228**	**24.551.373**	***Ending balance***

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang telah dibentuk cukup untuk menutup kemungkinan kerugian atas pendapatan bunga dan syariah yang masih akan diterima.

Management believes that the allowance for impairment losses is adequate to cover possible losses from interest and sharia income receivables.

Semua pinjaman yang diberikan, pembiayaan dan piutang syariah kepada debitur menggunakan mata uang Rupiah.

All loans, sharia financing and receivables granted by the Bank to the debtors denominated in Rupiah.

11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN DAN PIUTANG SYARIAH / *11. LOANS, SHARIA FINANCING AND RECEIVABLES*

a. Berdasarkan pihak dan jenis kredit / *a. By counterparties and loan type*

	31 Desember/*December 31*,		
	2023	**2022**	
Pinjaman yang diberikan	18.628.743.177	15.824.611.091	*Loans*
Dikurangi: Cadangan kerugian penurunan nilai	(574.872.202)	(538.118.251)	*Less: Allowance for impairment of loan losses*
Jumlah	**18.053.870.975**	**15.286.492.840**	***Total***

11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN DAN PIUTANG SYARIAH (lanjutan) / *11. LOANS, SHARIA FINANCING AND RECEIVABLES (continued)*

a. Berdasarkan pihak dan jenis kredit (lanjutan) / *a. By counterparties and loan type (continued)*

	31 Desember/*December 31*,		
	2023	**2022**	
Pihak Berelasi			***Related Parties***
Pinjaman tetap	14.093.005	15.767.732	*Fixed loans*
Pinjaman rekening koran	33.612.870	50.298.491	*Overdraft loans*
Pinjaman tetap dengan angsuran	93.067.628	2.590.000	*Fixed loans with installments*
Pinjaman serba guna	1.904.420	2.785.543	*Other loans*
Pinjaman konsumen	1.218.518	1.823.917	*Consumer loans*
	143.896.441	73.265.683	
Pihak Ketiga			***Third Parties***
Pinjaman tetap	9.683.420.015	8.845.158.112	*Fixed loans*
Pinjaman tetap dengan angsuran	6.771.225.706	5.075.586.745	*Fixed loans with installments*
Pinjaman rekening koran	1.838.154.121	1.627.457.490	*Overdraft loans*
Pinjaman konsumen	163.408.554	165.641.493	*Consumer loans*
Pinjaman serba guna	28.638.340	37.501.568	*Other loans*
	18.484.846.736	15.751.345.408	
Jumlah	18.628.743.177	15.824.611.091	*Total*
Dikurangi: Cadangan kerugian penurunan nilai	(574.872.202)	(538.118.251)	*Less: Allowance for impairment of loan losses*
Jumlah - bersih	**18.053.870.975**	**15.286.492.840**	***Total - net***

b. Berdasarkan pihak dan sektor ekonomi / *b. By counterparties and economic sector*

	31 Desember/*December 31*,		
	2023	**2022**	
Pihak Berelasi			***Related Parties***
Industri	91.679.382	449.566	*Industry*
Lembaga pembiayaan	28.697.953	47.840.259	*Financing*
Perdagangan, restoran dan hotel	20.052.215	16.439.766	*Trading, restaurant, and hotel*
Jasa-jasa sosial/masyarakat	12.568	2.596.228	*Social community service*
Lain-lain	3.454.323	5.939.864	*Others*
	143.896.441	73.265.683	
Pihak Ketiga			***Third Parties***
Lembaga pembiayaan	5.534.314.148	3.762.445.032	*Financing*
Perdagangan, restoran dan hotel	3.554.187.395	3.455.294.068	*Trading, restaurant, and hotel*
Real estate	2.533.798.811	2.434.559.491	*Real estate*
Industri	2.094.677.859	1.545.957.444	*Industry*
Konstruksi	737.806.956	782.271.513	*Construction*
Jasa-jasa sosial/masyarakat	349.338.531	420.555.309	*Social community service*
Lain-lain	3.680.723.036	3.350.262.551	*Others*
	18.484.846.736	15.751.345.408	
Jumlah	18.628.743.177	15.824.611.091	*Total*
Dikurangi: Cadangan kerugian penurunan nilai	(574.872.202)	(538.118.251)	*Less: Allowance for impairment losses*
Jumlah - bersih	**18.053.870.975**	**15.286.492.840**	***Total - net***

11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN DAN PIUTANG SYARIAH (lanjutan)

11. LOANS, SHARIA FINANCING AND RECEIVABLES (continued)

b. Berdasarkan pihak dan sektor ekonomi (lanjutan)

b. By counterparties and economic sector (continued)

Pada tanggal 31 Desember 2023 dan 2022, rasio pinjaman kepada Usaha Mikro kecil terhadap pinjaman yang diberikan sesuai dengan Surat Edaran Bank Indonesia No.13/30/DPNP tanggal 16 Desember 2011 masing-masing sebesar 16,39% dan 15,45% (tidak diaudit).

As of December 31, 2023 and 2022, the ratio of Micro Business loans to the total loans in accordance with Bank Indonesia Circular Letter No.13/30/DPNP dated December 16, 2011, was 16.39% and 15.45%, respectively (unaudited).

c. Berdasarkan jangka waktu periode perjanjian pinjaman

c. By period of the loan agreement

	31 Desember/*December 31*,		
	2023	**2022**	
Kurang dari 1 tahun	1.102.254.095	1.074.669.054	*Less than 1 year*
1 sampai dengan 2 tahun	8.989.930.116	7.064.604.782	*1 up to 2 years*
2 sampai dengan 5 tahun	2.288.156.059	1.792.845.362	*2 up to 5 years*
Lebih dari 5 tahun	6.248.402.907	5.892.491.893	*More than 5 years*
	18.628.743.177	15.824.611.091	
Dikurangi: Cadangan kerugian penurunan nilai	(574.872.202)	(538.118.251)	*Less: Allowance for impairment losses*
Jumlah	**18.053.870.975**	**15.286.492.840**	***Total***

d. Berdasarkan sisa umur jatuh tempo

d. By remaining period to maturity

	31 Desember/*December 31*,		
	2023	**2022**	
Kurang dari 1 tahun	10.230.458.965	8.317.221.072	*Less than 1 year*
1 sampai dengan 2 tahun	850.744.939	526.684.728	*1 up to 2 years*
2 sampai dengan 5 tahun	4.715.574.187	4.466.449.041	*2 up to 5 years*
Lebih dari 5 tahun	2.831.965.086	2.514.256.250	*More than 5 years*
	18.628.743.177	15.824.611.091	
Dikurangi: Cadangan kerugian penurunan nilai	(574.872.202)	(538.118.251)	*Less: Allowance for impairment losses*
Jumlah	**18.053.870.975**	**15.286.492.840**	***Total***

e. Berdasarkan kolektibilitas Bank Indonesia

e. By Bank Indonesia collectibility

	31 Desember/*December 31*,				
	2023		**2022**		
	Pokok/ *Principal*	**Cadangan/ *Allowance***	**Pokok/ *Principal***	**Cadangan/ *Allowance***	
Lancar	16.853.533.089	(188.687.597)	13.891.816.244	(127.059.296)	*Current*
Dalam perhatian khusus	1.031.746.709	(246.323.248)	1.264.168.321	(283.615.360)	*Special Mention*
Kurang lancar	92.773.486	(44.667.572)	75.569.484	(31.722.417)	*Substandard*
Diragukan	17.419.566	(4.528.633)	77.449.429	(25.271.075)	*Doubtful*
Macet	633.270.327	(90.665.152)	515.607.613	(70.450.103)	*Loss*
Jumlah	**18.628.743.177**	**(574.872.202)**	**15.824.611.091**	**(538.118.251)**	***Total***

11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN DAN PIUTANG SYARIAH (lanjutan)

11. *LOANS, SHARIA FINANCING AND RECEIVABLES (continued)*

f. Menurut *Stage*

f. *By Stage*

Berikut adalah perubahan jumlah pinjaman yang diberikan berdasarkan *stage* selama tahun berakhir 31 Desember 2023 dan 2022:

Below is movement of loans based on stages during the year ended December 31, 2023 and 2022:

	31 Desember/ *December 31,* 2023				
	Stage 1	*Stage* 2	*Stage* 3	Jumlah/ *Total*	
Saldo awal tahun	**13.749.721.837**	**1.406.262.727**	**668.626.527**	**15.824.611.091**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	524.560.294	(521.995.580)	(2.564.714)	-	*Transfer to expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage* 2)	(498.885.200)	498.885.200	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	(117.427.616)	(261.018.850)	378.446.466	-	*Transfer to credit impaired (Stage 3)*
Total saldo awal setelah pengalihan	13.657.969.315	1.122.133.497	1.044.508.279	15.824.611.091	*Total opening balance after transfer*
Pengukuran kembali bersih nilai tercatat	(1.338.336.571)	(73.638.752)	(159.342.477)	(1.571.317.800)	*Net remeasurement of carrying amount*
Aset keuangan yang baru diterbitkan atau dibeli	8.698.335.237	201.653.500	134.001.472	9.033.990.209	*New financial asset originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(4.183.072.609)	(199.763.819)	(67.043.684)	(4.449.880.112)	*Derecognition of financial asset*
Aset keuangan yang dihapusbuku	-	-	(208.660.211)	(208.660.211)	*Written-off financial assets*
Total penambahan/(pengurangan) tahun berjalan	3.176.926.057	(71.749.071)	(301.044.900)	2.804.132.086	*Total additional/(reversal) during the year*
Saldo akhir tahun	**16.834.895.372**	**1.050.384.426**	**743.463.379**	**18.628.743.177**	***Balance end of year***

	31 Desember/ *December 31,* 2022					
	Stage 1	*Stage* 2	*Stage* 3	Syariah/ *Sharia*	Jumlah/ *Total*	
Saldo awal tahun	**12.174.588.727**	**1.441.372.589**	**1.067.143.793**	**805.969.302**	**15.489.074.411**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	376.488.123	(364.589.511)	(11.898.612)	-	-	*Transfer to expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage* 2)	(523.152.234)	523.866.745	(714.511)	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	(131.787.056)	(8.368.253)	140.155.309	-	-	*Transfer to credit impaired (Stage 3)*
Total saldo awal setelah pengalihan	11.896.137.560	1.592.281.570	1.194.685.979	805.969.302	15.489.074.411	*Total opening balance after transfer*
Pengukuran kembali bersih nilai tercatat	(992.385.522)	(92.077.870)	(144.857.114)	-	(1.229.320.506)	*Net remeasurement of carrying amount*
Aset keuangan yang baru diterbitkan atau dibeli	5.628.818.812	87.888.637	35.213.454	-	5.751.920.903	*New financial asset originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(2.782.849.013)	(181.829.610)	(122.247.341)	-	(3.086.925.964)	*Derecognition of financial asset*
Aset keuangan yang dihapusbuku	-	-	(294.168.451)	-	(294.168.451)	*Written-off financial assets*
Total penambahan/(pengurangan) tahun berjalan	1.853.584.277	(186.018.843)	(526.059.452)	-	1.141.505.982	*Total additional/(reversal) during the year*
Dampak kehilangan pengendalian entitas anak	-	-	-	(805.969.302)	(805.969.302)	*Loss of control on subsidiary*
Saldo akhir tahun	**13.749.721.837**	**1.406.262.727**	**668.626.527**	**-**	**15.824.611.091**	***Balance end of year***

11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN DAN PIUTANG SYARIAH (lanjutan)

11. LOANS, SHARIA FINANCING AND RECEIVABLES (continued)

g. Pinjaman yang diberikan, pembiayaan dan piutang syariah yang mengalami penurunan nilai dan cadangan kerugian penurunan nilainya berdasarkan sektor ekonomi

g. Impaired loans, sharia financing and receivables and allowances for impairment losses by economic sector

Pinjaman yang mengalami penurunan nilai berdasarkan sektor ekonomi dan cadangan yang dibentuk:

Impaired loan based on economic sector and allowance:

	31 Desember/*December 31*,		
	2023	**2022**	
Real estate	664.731.842	347.855.539	*Real estate*
Perdagangan, restoran, dan hotel	240.812.559	328.804.972	*Trading, restaurant and hotel*
Konstruksi	121.490.813	57.310.883	*Construction*
Jasa-jasa sosial/masyarakat	117.355.295	39.186.518	*Social/community services*
Lembaga Pembiayaan	35.037.672	8.991.000	*Financing*
Industri	3.079.485	58.799.412	*Industry*
Lain-lain	419.454.946	78.751.491	*Others*
	1.601.962.612	919.699.815	
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(362.634.000)	(165.192.941)	*Allowance for impairment losses*
Jumlah	**1.239.328.612**	**754.506.874**	***Total***

Rasio pinjaman bermasalah (*Non-Performing Loan - NPL*) kotor Bank terhadap total pinjaman yang diberikan pada tanggal 31 Desember 2023 dan 2022 masing-masing sebesar 3,99% dan 4,23%. Rasio NPL neto Bank terhadap total pinjaman yang diberikan pada tanggal 31 Desember 2023 dan 2022 masing-masing sebesar 3,24% dan 3,42%.

The ratio of non-performing loan (NPL)-gross of the Bank as of December 31, 2023 and 2022 was 3.99% and 4.23% to total loans, respectively. Ratio NPL-net to total loans of the Bank as of December 31, 2023 and 2022 was 3.24% and 3.42%, respectively.

h. Pinjaman yang direstrukturisasi

h. Restructured loans

	31 Desember/*December 31*,		
	2023	**2022**	
Penjadwalan kembali angsuran dan perpanjangan jangka waktu pinjaman	2.868.304.020	3.102.181.766	*Rescheduling of installments and the extention of credit period*
Perpanjangan jangka waktu, penurunan suku bunga pinjaman, penggabungan fasilitas penambahan plafon	-	1.378.110.809	*Extention of credit period, reduction of interest rate, combined facility, additions of plafond*
Jumlah pinjaman yang direstrukturisasi	2.868.304.020	4.480.292.575	*Total restructured loans*
Dikurangi: Cadangan kerugian penurunan nilai	(447.527.201)	(428.127.277)	*Less: Allowance for impairment losses*
Jumlah	**2.420.776.819**	**4.052.165.298**	***Total***

11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN DAN PIUTANG SYARIAH (lanjutan)

11. LOANS, SHARIA FINANCING AND RECEIVABLES (continued)

h. Pinjaman yang direstrukturisasi (lanjutan)

h. Restructured loans (continued)

Berikut adalah jumlah pinjaman yang direstrukturisasi berdasarkan kolektibilitas pada tanggal 31 Desember 2023 dan 2022:

Below are the balance of restructured loans based on collectability as of December 31, 2023 and 2022:

	31 Desember/*December 31*,		
	2023	**2022**	
Lancar	1.276.007.551	2.651.901.635	*Current*
Dalam Perhatian Khusus	930.550.887	1.221.471.066	*Special Mention*
Kurang Lancar	33.788.024	73.415.364	*Substandard*
Diragukan	13.919.566	77.449.429	*Doubtful*
Macet	614.037.992	456.055.081	*Loss*
Jumlah pinjaman yang direstrukturisasi	2.868.304.020	4.480.292.575	*Total restructured loans*
Dikurangi: Cadangan kerugian penurunan nilai	(447.527.201)	(428.127.277)	*Less: Allowance for impairment losses*
Jumlah	2.420.776.819	**4.052.165.298**	***Total***

Berikut adalah jumlah pinjaman yang direstrukturisasi berdasarkan jenis pinjaman pada tanggal 31 Desember 2023 dan 2022:

Below are the balance of restructured loans based on type as of December 31, 2023 and 2022:

	31 Desember/*December 31*,		
	2023	**2022**	
Pinjaman tetap	1.820.536.969	2.790.047.805	*Fixed loans*
Pinjaman rekening koran	849.748.361	232.214.253	*Overdraft loans*
Pinjaman tetap dengan angsuran	146.129.251	1.383.190.366	*Fixed loans with installments*
Pinjaman konsumen	32.995.695	52.794.277	*Consumer loans*
Pinjaman serba guna	18.893.744	22.045.874	*Other loans*
Jumlah pinjaman yang direstrukturisasi	2.868.304.020	4.480.292.575	*Total restructured loans*
Dikurangi: Cadangan kerugian penurunan nilai	(447.527.201)	(428.127.277)	*Less: Allowance for impairment losses*
Jumlah	**2.420.776.819**	**4.052.165.298**	***Total***

Sehubungan dengan restrukturisasi dan relaksasi kredit sebagai dampak dari COVID-19, regulator mengeluarkan POJK No.11/POJK.03/2020 tanggal 16 Maret 2020 tentang Stimulus Perekonomian Nasional sebagai Kebijakan *Countercyclical* Dampak Penyebaran COVID-19 yang kemudian diperbaharui dengan POJK No.48/POJK.03/2020 tanggal 1 Desember 2020 dan diperbaharui dengan POJK No.17/POJK.03/2021 tanggal 10 September 2021. Jumlah pinjaman yang diberikan yang telah direstrukturisasi akibat dampak pandemi COVID-19 pada tanggal 31 Desember 2023 dan 2022 masing-masing sebesar Rp1.416.009.064 dan Rp3.763.830.225.

In relation to loan restructuring and relaxation due to COVID-19 impact, the regulator issued POJK No.11/POJK.03/2020 dated March 16, 2020 regarding National Economy Stimulus as the COVID-19 Outbreak Impact Countercyclical Policy that amended to POJK No. 48/POJK.03/2020 dated December 1, 2020 and reamend under POJK No.17/POJK.03/2021 dated on September 10, 2021. The amount of loan that have been restructured as a result of the COVID-19 pandemic as of December 31, 2023 and 2022 amounting to Rp1,416,009,064 and Rp3,763,830,225, respectively.

11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN DAN PIUTANG SYARIAH (lanjutan)

i. Perubahan cadangan kerugian penurunan nilai

11. LOANS, SHARIA FINANCING AND RECEIVABLES (continued)

i. The changes in allowance for impairment losses

	31 Desember/ December 31, 2023				
	Stage 1	*Stage* 2	*Stage* 3	Jumlah/ *Total*	
Saldo awal tahun	**113.248.446**	**297.426.209**	**127.443.596**	**538.118.251**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	101.250.110	(100.340.521)	(909.589)	-	*Transfer to 12 month expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage* 2)	(5.550.699)	5.550.699	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	(1.669.222)	(34.430.698)	36.099.920	-	*Transfer to credit impaired (Stage 3)*
Total saldo awal setelah pengalihan	207.278.635	168.205.689	162.633.927	538.118.251	*Beginning balance after stage transfer*
Pengukuran kembali bersih penyisihan kerugian	(107.119.134)	139.909.436	185.691.182	218.481.484	*Net remeasurement of carrying amount*
Aset keuangan yang baru diterbitkan atau dibeli	41.176.937	61.568.430	9.266.982	112.012.349	*New financial asset originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(28.530.381)	(47.478.767)	(9.070.523)	(85.079.671)	*Derecognized financial assets*
Aset keuangan yang dihapusbuku	-	-	(208.660.211)	(208.660.211)	*Written-off financial assets*
Total pembentukan/(pembalikan) tahun	(94.472.578)	153.999.099	(22.772.570)	36.753.951	*Net change in exposure*
Saldo akhir tahun	**112.806.057**	**322.204.788**	**139.861.357**	**574.872.202**	***Balance end of year***

	31 Desember/ *December 31*, 2022					
	Stage 1	*Stage* 2	*Stage* 3	Syariah/ *Sharia*	Jumlah/ *Total*	
Saldo awal tahun	**103.598.821**	**79.800.317**	**468.103.610**	**50.771.005**	**702.273.753**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	20.994.941	(17.783.674)	(3.211.267)	-	-	*Transfer to 12 month expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage* 2)	(19.788.628)	20.001.621	(212.993)	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	(3.580.076)	(714.839)	4.294.915	-	-	*Transfer to credit impaired (Stage 3)*
Total saldo awal setelah pengalihan	101.225.058	81.303.425	468.974.265	50.771.005	702.273.753	*Beginning balance after stage transfer*
Pengukuran kembali bersih penyisihan kerugian	(22.860.111)	210.052.392	(9.783.183)	-	177.409.098	*Net remeasurement of carrying amount*
Aset keuangan yang baru diterbitkan atau dibeli	43.465.945	14.442.163	12.597.767	-	70.505.875	*New financial asset originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(8.582.446)	(8.371.771)	(50.176.802)	-	(67.131.019)	*Derecognized financial assets*
Aset keuangan yang dihapusbuku	-	-	(294.168.451)	-	(294.168.451)	*Written-off financial assets*
Total pembentukan/(pembalikan) tahun	12.023.388	216.122.783	(341.530.669)	-	(113.384.497)	*Net change in exposure*
Dampak kehilangan pengendalian entitas anak	-	-	-	(50.771.005)	(50.771.005)	*Loss of control on subsidiary*
Saldo akhir tahun	**113.248.446**	**297.426.209**	**127.443.596**	**-**	**538.118.251**	***Balance end of year***

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai untuk pinjaman yang diberikan, pembiayaan dan piutang syariah adalah cukup untuk menutup kerugian yang mungkin timbul akibat tidak tertagihnya pinjaman.

The management believe that allowance for impairment losses of loans, sharia financing and receivables is adequate to cover impairment losses that might arise from uncollectible loans.

11. PINJAMAN YANG DIBERIKAN, PEMBIAYAAN DAN PIUTANG SYARIAH (lanjutan)

Pada tanggal 26 Desember 2018, OJK mengeluarkan ketentuan baru yaitu No. 32/POJK.03/2018 tentang "Batas Maksimum Pemberian Kredit dan Penyediaan Dana Besar bagi Bank Umum" yang berlaku efektif sejak 1 September 2019 yang sebagian pasalnya diubah dengan POJK No. 38/POJK.03/2019 tanggal 19 Desember 2019. Peraturan tersebut menetapkan batas maksimum penyediaan dana kepada satu debitur dan/atau kelompok debitur yang bukan merupakan pihak berelasi tidak melebihi 25% dari modal inti Bank. Pada tanggal 31 Desember 2023 dan 2022 tidak terdapat pelampauan dan pelanggaran atas BMPK baik kepada pihak berelasi maupun pihak ketiga.

Jaminan atas pinjaman yang diberikan berupa tanah, bangunan, saham, giro, deposito berjangka, mesin, persediaan, dan piutang. Deposito berjangka yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2023 dan 2022 masing-masing sebesar Rp1.719.715.512 dan Rp707.564.744 (Catatan 18) dengan *outstanding* pinjaman masing-masing sebesar Rp6.228.669.396 dan Rp636.277.117. Giro yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2023 dan 2022 masing-masing sebesar Rp320.546.300 dan Rp118.115.313 (Catatan 18) dengan *outstanding* pinjaman masing-masing sebesar Rp730.857.049 dan Rp138.038.686. Tabungan yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2023 sebesar Rp149.150.000 (Catatan 18) dengan *outstanding* pinjaman sebesar Rp409.964.166. *Negotiable Certificate Depotit* (NCD) yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2023 sebesar Rp116.900.000 (Catatan 18) dengan *outstanding* pinjaman sebesar Rp82.181.253.

11. LOANS, SHARIA FINANCING AND RECEIVABLES (continued)

On December 26, 2018, OJK issued new regulation No. 32/POJK.03/2018 regarding "Legal Lending Limit and Large Exposure *for Commercial Bank" which effective since September 1, 2019, which amended partially by POJK No. 38/POJK.03/2019 dated December 19, 2019. This regulation requires the maximum lending limit to one and/or group of nonrelated party debtor which not exceed to 25% of the Bank's core capital. As of December 31, 2023 and 2022, there were no breach and no violation of the LLL requirements both to related parties and third parties.*

Collaterals for loans are in form of as land, building, shares, demand deposits, time deposits, machinery, inventories, and receivables. Time deposits that are pledged as cash collateral for loans as of December 31, 2023 and 2022 amounted to Rp1,719,715,512 and Rp707,564,744 (Note 18) with loan outstanding of Rp6,228,669,396 and Rp636,277,117, respectively. Demand deposits that are pledged as cash collateral for loans as of December 31, 2023 and 2022 amounted to Rp320,546,300 and Rp118,115,313 (Note 18) with loan outstanding of Rp730,857,049 and Rp138,038,686, respectively. Saving deposits that are pledged as cash collateral for loans as of December 31, 2023 amounted to Rp149,150,000 (Note 18) with loan outstanding of Rp409,964,166. Negotiable Certificate Deposits (NCD) that are pledged as cash collateral for loans as of December 31, 2023 amounted to Rp116,900,000 (Note 18) with loan outstanding of Rp82,181,253.

12. PENYERTAAN SAHAM / ***12. INVESTMENTS IN SHARES***

	Kepemilikan/ *Ownership*	31 Desember/*December 31* 2023	2022	
Diukur pada FVTPL				***Measured at FVTPL***
PT Bima Multi Finance	34,91%	0*)	31.877.279	*PT Bima Multi Finance*
Entitas asosiasi:				***Associate Entity:***
PT Bank Victoria Syariah (Lihat Catatan 48)	19,81%	215.930.505	210.227.044	*PT Bank Victoria Syariah (See Note 48)*
Jumlah		215.930.505	242.104.323	*Total*

*) nilai wajar saham PT Bima Multi Finance adalah sebesar Rp1 (dalam nilai penuh)

**) fair value of shares in PT Bima Multi Finance are Rp1 (in full amount)*

12. PENYERTAAN SAHAM (lanjutan)

Pada tanggal 15 Desember 2023, Bank melakukan transaksi penjualan atas saham yang dimiliki pada PT Bima Multi Finance kepada PT Sumber Daya Sakti dengan harga jual sebesar Rp80.297. Nilai jual ditentukan diatas hasil penilaian yang dilakukan oleh KJPP Tri, Santi & Rekan tertanggal 8 Desember 2023. Sampai dengan tanggal laporan keuangan ini, transaksi pengalihan saham masih dalam proses pelaporan dan pencatatan di Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia oleh PT Bima Multi Finance. Pada tanggal 31 Desember 2023, Bank telah mencatat kerugian penurunan nilai wajar atas penyertaan saham PT Bima Multi Finance sebesar Rp31.877.279, sehingga nilai tercatat penyertaan saham di PT Bima Multi Finance adalah Rp1 (dalam nilai penuh) per 31 Desember 2023.

Dalam rangka memenuhi modal inti sebesar Rp1.000.000.000 (satu triliun rupiah) di PT Bank Victoria Syariah, Bank melakukan penambahan penyertaan modal kepada Bank Victoria Syariah sebesar Rp138.000.000 yang telah mendapat persetujuan dari Otoritas Jasa Keuangan (OJK) melalui surat No. S-137/PB.33/2022 tanggal 27 Desember 2022.

Berdasarkan Berita Acara Rapat Umum Luar Biasa para Pemegang Saham PT Bima Multi Finance tertanggal 12 November 2018 dan Akta Notaris No. 19 tanggal 12 Maret 2019 yang dibuat dihadapan Drs. Wijanto Suwongso, SH., Notaris di Jakarta, Bank dan beberapa kreditur lainnya telah menyetujui konversi pinjaman jangka panjang dan MTN PT Bima Multi Finance menjadi saham dengan nilai konversi Rp500 per lembar saham (nilai Rupiah penuh). Perubahan ini telah diterima dan dicatat di dalam database Sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan Surat No. AHU-AH.01.03-0151322 tanggal 15 Maret 2019. Melalui proses konversi ini, Bank memiliki persentase kepemilikan sebesar 34,91% di PT Bima Multi Finance dan mencatatnya sebagai penyertaan saham sementara sebesar Rp168.907.325 (bruto). Setelah mencatat penyertaan saham sementara, Bank tidak lagi mengakui pinjaman yang diberikan dan MTN pada PT Bima Multi Finance.

12. INVESTMENTS IN SHARES (continued)

On December 15, 2023, the Bank sold its shares ownership in PT Bima Multi Finance to PT Sumber Daya Sakti with selling price of Rp80.297. The selling value is above the result of valuation performed by KJPP Tri, Santi & Partners dated December 8, 2023. As of the date of this financial statements, the share transfer transaction is still in the process of registering and recording in Ministry of Law and Human Rights of the Republic of Indonesia. As of December 31, 2023, the Bank has recorded a loss from decrease in fair value on shares ownership in PT Bima Multi Finance amounting to Rp31,877,279, therefore the balance of investment in shares in PT Bima Multi Finance is Rp1 (in full amount) as of December 31, 2023.

In order to fulfill the minimum core capital requirement amounting to Rp1,000,000,000 (one trillion Rupiah) for PT Bank Victoria Syariah, Bank has injected an additional investment in PT Bank Victoria Syariah shares amounting to Rp138,000,000 which has been approved by Financial Service Authority through letter No. S-137/PB.33/2022 dated December 27, 2022.

Based on the Minutes of Extraordinary Shareholders Meeting of PT Bima Multi Finance dated November 12, 2018 and Notarial Deed No. 19 dated March 12, 2019 of Drs. Wijanto Suwongso, S.H., a Notary in Jakarta, Bank and the other creditors have agreed on the convertion from long term loan and MTN of PT Bima Multi Finance into shares with convertion rate of Rp500 per shares (Rupiah full amount). This changes has been accepted and recorded in database of Legal Entities Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia in its Letter No. AHU-AH.01.03-0151322 dated March 15, 2019. From this convertion process, Bank has 34.91% percentage of ownership in PT Bima Multi Finance and recorded as temporary investment in shares amounted to Rp168,907,325 (gross). After recording a temporary investment in shares, the Bank no longer recognise the loans and MTN in PT Bima Multi Finance.

12. PENYERTAAN SAHAM (lanjutan)

Bank wajib untuk melakukan divestasi penyertaan saham sementara apabila penyertaan saham sementara telah melebihi jangka waktu paling lama 5 (lima) tahun atau PT Bima Multi Finance telah mencatatkan saldo laba positif pada ekuitasnya. Hal ini sesuai dengan intensi dari Bank untuk menjual penyertaan saham sementara pada PT Bima Multi Finance apabila telah memenuhi kriteria yang ditentukan.

Bank juga tidak memiliki pengaruh signifikan pada PT Bima Multi Finance dibuktikan dengan:

i. Tidak terdapat wakil dari Bank yang menjabat sebagai Dewan Direksi dan Dewan Komisaris atau organ setara di PT Bima Multi Finance;

ii. Bank tidak berpartisipasi dalam proses pembuatan kebijakan, termasuk dalam partisipasi dalam pengambilan keputusan tentang dividen atau distribusi lain pada PT Bima Multi Finance;
iii. Tidak adanya transaksi material antara Bank dengan PT Bima Multi Finance;
iv. Tidak terdapat pertukaran personil manajerial antara Bank dengan PT Bima Multi Finance; dan
v. Bank tidak terlibat dalam penyediaan teknis informasi pokok untuk PT Bima Multi Finance.

Lihat Catatan 46 untuk pengukuran nilai wajar penyertaan saham sementara pada tanggal 31 Desember 2023 dan 2022.

12. INVESTMENTS IN SHARES (continued)

Banks are obliged to divest temporary investment in shares if the temporary investment in shares have exceeded a maximum period of 5 (five) years or PT Bima Multi Finance has recorded positive retained earnings in their equity. This is in accordance with the Bank's intention to sell the temporary investment in PT Bima Multi Finance if it has meets the specified criteria.

Bank also does not have a significant influence on PT Bima Multi Finance as evidenced by:

i. There is no representative from the Bank who serves as the Board of Directors and the Board of the Commissioners or equivalent organs in PT Bima Multi Finance;
ii. The Bank does not participate in the policy-making process, including participation in decision-making about dividends or other distributions in PT Bima Multi Finance;

iii. There is no material transaction between the Bank and PT Bima Multi Finance;
iv. There is no managerial personnel exchange between the Bank and PT Bima Multi Finance; and
v. The Bank is not involved in providing principal technical information for PT Bima Multi Finance.

Refer to Note 46 for fair value measurement of temporary investment in shares as of December 31, 2023 and 2022.

13. BIAYA DIBAYAR DIMUKA / *13. PREPAID EXPENSES*

	31 Desember/*December 31*,		
	2023	**2022**	
Promosi	17.034.405	13.650.866	*Promotion*
Pengembangan teknologi	3.152.376	3.225.434	*Technology development*
Sewa dibayar dimuka	877.362	61.337	*Prepaid rent*
Lain-lain	4.400.881	2.777.040	*Others*
Jumlah	**25.465.024**	**19.714.677**	***Total***

Lain-lain sebagian besar terdiri dari premi asuransi dibayar dimuka, biaya dibayar dimuka personalia dan biaya jasa hukum.

Others mainly consists of prepaid insurances, prepaid salaries expenses and legal fees.

14. ASET TETAP DAN ASET HAK-GUNA / *14. FIXED ASSETS AND RIGHT-OF-USE ASSETS*

Aset tetap terdiri dari: / *Fixed assets consist of the following:*

	31 Desember/*December 31*, 2023	31 Desember/*December 31*, 2022	
Kepemilikan langsung	376.477.361	435.038.435	*Direct ownership*
Aset hak-guna	46.749.843	35.814.592	*Right-of-use assets*
Jumlah	**423.227.204**	**470.853.027**	***Total***

Aset tetap kepemilikan langsung / *Direct ownership fixed assets*

31 Desember/*December 31*, 2023

	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Kapitalisasi/ *Capitalisation*	Reklasifikasi/ *Reclassification*	Saldo akhir/ *Ending balance*	
Biaya Perolehan							***Acquisition Cost***
Kepemilikan langsung:							*Direct ownership:*
Tanah	371.644.982	-	(44.913.045)	350.580	(10.944.771)	316.137.746	*Land*
Bangunan	59.090.423	1.613.152	(6.366.089)	149.000	(3.484.833)	51.001.653	*Buildings*
Kendaraan bermotor	6.030.655	2.099.300	(4.800)	-	-	8.125.155	*Vehicles*
Mesin-mesin dan peralatan	30.603.912	12.079.980	(274.690)	-	-	42.409.202	*Machinery and equipment*
Perlengkapan dan perabotan kantor	6.317.231	398.594	(68.075)	-	-	6.647.750	*Office furniture and equipment*
Aset tetap dalam proses pembangunan	21.086.752	4.774	(1.450.000)	-	(350.580)	19.290.946	*Assets under constructions*
Jumlah biaya perolehan	494.773.955	16.195.800	(53.076.699)	499.580	(14.780.184)	443.612.452	*Total acquisition cost*
Akumulasi Penyusutan							***Accumulated Depreciation***
Kepemilikan langsung:							*Direct ownership:*
Bangunan	24.792.291	6.296.274	(2.246.808)	-	(1.161.033)	27.680.724	*Buildings*
Kendaraan bermotor	5.642.107	290.984	(4.800)	-	-	5.928.291	*Vehicles*
Mesin-mesin dan peralatan	23.339.109	4.351.117	(274.514)	-	-	27.415.712	*Machinery and equipment*
Perlengkapan dan perabotan kantor	5.962.013	216.426	(68.075)	-	-	6.110.364	*Office furniture and equipment*
Jumlah akumulasi penyusutan	59.735.520	11.154.801	(2.594.197)	-	(1.161.033)	67.135.091	*Total accumulated depreciation*
Nilai buku bersih	**435.038.435**					**376.477.361**	***Net book value***

31 Desember/*December 31*, 2022

	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Deductions*)*	Kapitalisasi/ *Capitalisation*	Reklasifikasi/ *Reclassification*	Saldo akhir/ *Ending balance*	
Biaya Perolehan							***Acquisition Cost***
Kepemilikan langsung:							*Direct ownership:*
Tanah	412.385.631	-	(14.574.092)	-	(26.166.557)	371.644.982	*Land*
Bangunan	73.103.906	-	(3.455.173)	-	(10.558.310)	59.090.423	*Buildings*
Kendaraan bermotor	8.426.186	-	(2.395.531)	-	-	6.030.655	*Vehicles*
Mesin-mesin dan peralatan	28.408.466	7.236.404	(5.040.958)	-	-	30.603.912	*Machinery and equipment*
Perlengkapan dan perabotan kantor	7.576.000	285.464	(1.544.233)	-	-	6.317.231	*Office furniture and equipment*
Aset tetap dalam proses pembangunan	21.081.980	4.774	(2)	-	-	21.086.752	*Assets under constructions*
Jumlah biaya perolehan	550.982.169	7.526.642	(27.009.989)	-	(36.724.867)	494.773.955	*Total acquisition cost*
Akumulasi Penyusutan							***Accumulated Depreciation***
Kepemilikan langsung:							*Direct ownership:*
Bangunan	19.280.356	9.609.703	(670.046)	-	(3.427.722)	24.792.291	*Buildings*
Kendaraan bermotor	7.051.855	970.946	(2.380.694)	-	-	5.642.107	*Vehicles*
Mesin-mesin dan peralatan	25.777.066	2.498.941	(4.936.898)	-	-	23.339.109	*Machinery and equipment*
Perlengkapan dan perabotan kantor	7.191.454	250.144	(1.479.585)	-	-	5.962.013	*Office furniture and equipment*
Jumlah akumulasi penyusutan	59.300.731	13.329.734	(9.467.223)	-	(3.427.722)	59.735.520	*Total accumulated depreciation*
Nilai buku bersih	**491.681.438**					**435.038.435**	***Net book value***

14. ASET TETAP DAN ASET HAK-GUNA (lanjutan) / *14. FIXED ASSETS AND RIGHT-OF-USE ASSETS (continued)*

Aset tetap kepemilikan langsung (lanjutan) / ***Direct ownership fixed assets (continued)***

Rincian laba/(rugi) penjualan aset tetap adalah sebagai berikut: / *The details of gain/(loss) on sale of fixed assets are as follows:*

	31 Desember/*December 31*,		
	2023	**2022**	
Hasil penjualan aset tetap	45.395.525	17.394.945	*Proceeds from sale of fixed assets*
Nilai buku	(49.032.326)	(17.177.219)	*Book value*
Laba/(rugi) penjualan aset tetap (Catatan 36)	**(3.636.801)**	**217.726**	***Gain/(loss) on sale of fixed assets (Note 36)***

Laba/(rugi) penjualan aset tetap disajikan sebagai bagian dari akun "Beban non-operasional - bersih" pada laporan laba rugi dan penghasilan komprehensif (Catatan 36).

Gain/(loss) on sale of fixed assets is presented as part of "Non-operating expense - net" in the statement profit or loss and other comprehensive income (Note 36).

Aset tetap dalam proses pembangunan pada tanggal 31 Desember 2023 dan 2022 masing-masing sebesar Rp19.290.946 dan Rp21.081.980 merupakan tanah dan bangunan yang dibeli dan masih dalam tahap perizinan dan perpanjangan Surat Hak Guna Bangunan (SHGB). Estimasi persentase tingkat penyelesaian aset tetap dalam proses pembangunan pada tanggal 31 Desember 2023 dan 2022 adalah 90%. Konstruksi tersebut diperkirakan akan selesai pada tahun 2024.

Assets under construction as of December 31, 2023 and 2022 amounting to Rp19,290,946 and Rp21,081,980, respectively, related to land and buildings that were bought but still under licensing phase and extension of Rights to Build (SHGB). The estimated percentage of completion of Construction in progress as of December 31, 2023 and 2022 is 90%. Those constructions are estimated to be completed in 2024.

Bank memiliki beberapa bidang tanah yang terletak di Jakarta, Surabaya, dan Denpasar dengan hak kepemilikan berupa Hak Guna Bangunan yang berjangka waktu antara 20 (dua puluh) sampai dengan 30 (tiga puluh) tahun yang akan jatuh tempo dalam berbagai tahun sampai tahun 2046. Manajemen berpendapat bahwa tidak terdapat masalah dengan perpanjangan hak atas tanah karena seluruh tanah diperoleh secara sah dan didukung dengan bukti pemilikan yang memadai.

The Bank own several fields of land in Jakarta, Surabaya, and Denpasar with Building Usage Rights ("HGB") for 20 (twenty) up to 30 (thirty) years which will expire in various years up to 2046. The management believes that there will be no difficulty in the extension of the land rights since all of the land were acquired legally and supported by sufficient evidence of ownership.

Aset tetap, kecuali tanah, diasuransikan terhadap risiko kebakaran dan pencurian kepada PT Victoria Insurance (pihak berelasi), PT Zurich Asuransi Indonesia Tbk dan PT Asuransi Takaful Umum dengan nilai pertanggungan seluruhnya pada tanggal 31 Desember 2023 dan 2022 masing-masing sebesar Rp160.234.700 dan Rp177.223.197. Manajemen Bank berpendapat bahwa nilai pertanggungan tersebut telah memadai untuk menutup kemungkinan kerugian atas aset tetap yang dipertanggungkan.

Fixed assets, except land, are insured against losses by fire and theft risks to PT Victoria Insurance (related party), PT Zurich Asuransi Indonesia Tbk dan PT Asuransi Takaful Umum with total insurance coverage as of December 31, 2023 and 2022 amounting Rp160,234,700 and Rp177,223,197, respectively. The Bank's management believe that the insurance coverage is adequate to cover possible losses on fixed assets insured.

14. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

14. FIXED ASSETS AND RIGHT-OF-USE ASSETS (continued)

Aset tetap kepemilikan langsung (lanjutan)

Direct ownership fixed assets (continued)

Seluruh aset tetap yang ada pada tanggal pelaporan 31 Desember 2023 dan 2022 digunakan untuk menunjang aktivitas operasi Bank. Pada tanggal 31 Desember 2023 dan 2022, jumlah nilai perolehan aset tetap yang telah disusutkan penuh namun masih digunakan masing-masing adalah sebesar Rp50.576.817 dan Rp44.227.241.

All of the fixed assets as of the reporting date December 31, 2023 and 2022 are used to support the Bank's operation activities. As of December 31, 2023 and 2022, the total acquisition cost of fixed assets that have been fully depreciated but still in use amounted Rp50,576,817 and Rp44,227,241, respectively.

Manajemen Bank telah melakukan pengkajian kembali atas estimasi umur ekonomis, metode penyusutan dan nilai residu aset tetap pada tanggal 31 Desember 2023 dan 2022.

The Bank's Management has re-assessed the estimation of useful lives,depreciation method and residual value of fixed assets on December 31, 2023 and 2022.

Tidak terdapat aset tetap yang dihentikan dari penggunaan aktif atau diklasifikasikan sebagai tersedia untuk dijual.

There are no fixed assets discontinued from active use or classified as assets held for sale.

Berikut adalah perkiraan jumlah nilai tercatat aset tetap jika dicatat dengan metode biaya pada tanggal 31 Desember 2023 dan 2022:

Below is the estimated net book value of fixed asset if recorded using cost method as of December 31, 2023 and 2022:

	31 Desember/*December 31*,		
	2023	**2022**	
Tanah	275.568.597	331.075.833	*Land*
Bangunan	7.761.128	18.738.330	*Building*
Kendaraan Bermotor	2.196.864	388.548	*Vehicle*
Mesin dan Peralatan	14.993.490	7.264.803	*Machinery and equipment*
Perlengkapan dan perabotan kantor	537.386	355.218	*Office furniture and equipment*
Aset dalam penyelesaian	19.636.752	21.086.752	*Assets under constructions*
	320.694.217	**378.909.484**	

Aset hak-guna

Right-of-use assets

Aset hak-guna pada 31 Desember 2023 dan 2022 adalah sebagai berikut:

Rights-of-use assets as of December 31, 2023 and 2022 are as follows:

	31 Desember/ *December 31*, 2023					
	Saldo awal/ ***Beginning balance***	**Penambahan/** ***Additions***	**Pengurangan/** ***Disposals***	**Reklasifikasi/** ***Reclassification***	**Saldo akhir/** ***Ending balance***	
Aset hak-guna						***Right-of-use assets***
Bangunan	49.959.422	21.754.777	(10.240.056)	-	61.474.143	*Buildings*
Akumulasi Penyusutan						***Accumulated Depreciation***
Bangunan	14.144.830	10.819.526	(10.240.056)	-	14.724.300	*Buildings*
Nilai buku bersih	**35.814.592**				**46.749.843**	***Net book value***

14. ASET TETAP DAN ASET HAK-GUNA (lanjutan) / *14. FIXED ASSETS AND RIGHT-OF-USE ASSETS (continued)*

Aset hak-guna (lanjutan) / ***Right-of-use assets (continued)***

Aset hak-guna pada 31 Desember 2023 dan 2022 adalah sebagai berikut: (lanjutan)

Rights-of-use assets as of December 31, 2023 and 2022 are as follows: (continued)

	31 Desember/ *December 31*, 2022					
	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Disposals*)*	Reklasifikasi/ *Reclassification*	Saldo akhir/ *Ending balance*	
Aset hak-guna						***Right-of-use assets***
Bangunan	48.499.676	32.946.006	(31.486.260)	-	49.959.422	*Buildings*
Akumulasi Penyusutan						***Accumulated Depreciation***
Bangunan	32.061.766	9.379.512	(27.296.448)	-	14.144.830	*Buildings*
Nilai buku bersih	**16.437.910**				**35.814.592**	***Net book value***

*) Termasuk dalam pengurangan adalah dampak kehilangan pengendalian atas entitas anak

Include in deductions is the impact of loss of control on subsidiary (

Pada tanggal 31 Desember 2023 dan 2022, penyusutan yang tercatat pada Bank adalah sebagai berikut:

As of December 31, 2023 and 2022, depreciation expense recorded by the Bank as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Penyusutan aset tetap	11.154.801	13.329.734	*Depreciation of fixed asset*
Penyusutan sewa guna usaha	10.819.526	9.379.512	*Depreciation of right-of-use assets*
Jumlah	**21.974.327**	**22.709.246**	***Total***

Laporan posisi keuangan menunjukkan jumlah terkait sewa adalah sebagai berikut:

The balance sheet shows the following amounts relating to leases:

	31 Desember/*December 31*,		
	2023	**2022**	
Aset hak-guna:			*Right-of-use assets:*
- Bangunan	46.749.843	35.814.592	*Buildings -*
	46.749.843	**35.814.592**	
Liabilitas sewa (Catatan 23)	47.309.526	33.100.288	*Lease liabilities (Note 23)*
	47.309.526	**33.100.288**	

Laporan laba rugi menunjukkan jumlah terkait sewa adalah sebagai berikut:

The statement of profit or loss shows the following amounts relating to leases:

	31 Desember/*December 31*,		
	2023	**2022**	
Beban penyusutan	10.819.526	9.379.512	*Depreciation expense*
Beban bunga (Catatan 33)	2.854.679	1.002.883	*Interest expense (Note 33)*
Jumlah	**13.674.205**	**10.382.395**	***Total***

14. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

Revaluasi aset tetap

Penilaian pada nilai wajar aset tetap yang dimiliki Bank pada 31 Desember 2020 telah dilakukan oleh Kantor Jasa Penilai Publik ("KJPP") Antonius Setiady dan Rekan dengan laporan penilaian tertanggal 26 Februari 2021, yang kemudian diterbitkan kembali dengan laporan penilaian tertanggal 27 Juli 2022 untuk menggantikan penilaian tertanggal 26 Februari 2021 tersebut. Laporan penilaian ditandatangani oleh Andrius Hermawan, MAPPI (Cert), penilai independen yang telah terdaftar pada OJK.

Metode penilaian yang digunakan adalah Metode Pendekatan Data Pasar dan Metode Biaya. Data pembanding untuk menentukan nilai wajar aset diperoleh dari data transaksi jual beli dari aset sebanding dengan menyesuaikan perbedaan-perbedaan antara aset yang dinilai dengan data pembanding. Perbandingan ini juga menyangkut berbagai faktor seperti lokasi, luas, bentuk, karakteristik dan kegunannya berdasarkan unsur waktu dan peruntukannya.

Surplus revaluasi tahun 2020 sebesar Rp56.128.951 telah dikreditkan pada pendapatan komprehensif lainnya dan disajikan sebagai "Surplus revaluasi aset tetap" di ekuitas.

Pada tanggal 31 Desember 2021, terdapat penambahan atas saldo revaluasi aset tetap sebesar Rp7.083.877 disebabkan oleh pembalikan cadangan pajak yang dibentuk oleh Bank atas surplus revaluasi aset tetap tahun 2020.

Pada tanggal 31 Desember 2023 dan 2022 saldo surplus revaluasi aset tetap masing-masing adalah sebesar Rp382.456.152 dan Rp382.456.152.

14. FIXED ASSETS AND RIGHT-OF-USE ASSETS (continued)

Fixed asset revaluation

Valuation to determine the fair value of the Bank's fixed assets as of December 31, 2020 was performed by Kantor Jasa Penilai Publik ("KJPP") Antonius Setiady dan Rekan with valuation report dated February 26, 2021, which was subsequently reissued with valuation report dated July 27, 2022 to replace the valuation report dated February 26, 2021. The valuation report was signed by Andrius Hermawan, MAPPI (Cert), independent appraiser registered in OJK.

Valuation method used is Market Data Approach and Cost Approach Method. Comparative data to determine fair value asset is obtained from data of sale and purchase transactions from comparable assets by adjusting differences between assets valued and comparable data. This comparison is also concerns factors such as location, size, shape, characteristics and function based on its time and intended used.

The revaluation surplus on 2020 of Rp56,128,951 was credited to other comprehensive income and presented as "Gain on revaluation of fixed assets" in equity.

As of December 31, 2021, Bank has additional of revaluation surplus of fixed assets amounted Rp7,083,877 from reversal of tax reserve provided in 2020 for revaluation surplus of fixed assets in 2020.

As of December 31, 2023 and 2022, gain on revaluation of fixed assets amounted to Rp382,456,152 and Rp382,456,152, respectively.

15. AGUNAN YANG DIAMBIL ALIH

Agunan yang diambil alih untuk penyelesaian pinjaman yang diberikan dicatat dalam akun Agunan yang Diambil Alih ("AYDA"). Rincian dalam akun ini adalah:

15. FORECLOSED ASSETS

Foreclosed assets in settlement of loans are included in Foreclosed assets ("AYDA") account. The details in the account are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Tanah dan bangunan	802.486.682	1.237.844.890	*Land and building*
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(251.870.489)	(306.834.651)	*Allowance for impairment losses*
	550.616.193	**931.010.239**	

15. AGUNAN YANG DIAMBIL ALIH (lanjutan) / *15. FORECLOSED ASSETS (continued)*

Berdasarkan Peraturan Otoritas Jasa Keuangan (POJK) No. 40/POJK.03/2019 tanggal 19 Desember 2019 tentang "Penilaian Kualitas Aktiva Bank Umum", khususnya agunan yang diambil alih, Bank diwajibkan untuk melakukan upaya penyelesaian terhadap agunan yang diambil alih yang dimiliki.

Based on Financial Service Authority Regulation No. 40/POJK.03/2019 dated December 19, 2019 regarding "Asset Quality Ratings for Commercial Banks" and particularly on the foreclosed assets, the Bank is required to have an action plan for settlement of its foreclosed assets.

Mutasi nilai agunan yang diambil alih adalah sebagai berikut:

The changes in foreclosed assets are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Saldo awal	**1.237.844.890**	**1.436.697.691**	***Beginning balance***
Penambahan selama tahun berjalan	-	193.324.072	*Addition during the year*
Pengurangan selama tahun berjalan	(435.358.208)	(279.521.470)	*Deduction during the year*
Dampak kehilangan pengendalian entitas anak	-	(112.655.403)	*Loss of control on subsidiary*
Saldo akhir	**802.486.682**	**1.237.844.890**	***Ending balance***

Mutasi cadangan kerugian penurunan nilai untuk agunan yang diambil alih adalah sebagai berikut:

The changes in allowance for impairment losses of forecosed assets are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Saldo awal	**306.834.651**	**282.641.086**	***Beginning balance***
Penambahan selama tahun berjalan	48.469.233	47.616.890	*Addition during the year*
Pengurangan selama tahun berjalan	(103.433.395)	-	*Deduction during the year*
Dampak kehilangan pengendalian entitas anak	-	(23.423.325)	*Loss of control on subsidiary*
Saldo akhir	**251.870.489**	**306.834.651**	***Ending balance***

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang telah dibentuk cukup untuk menutup kemungkinan kerugian atas agunan yang diambil alih.

Management believes that the allowance for impairment losses is adequate to cover possible losses from foreclosed assets.

16. ASET TAK BERWUJUD / *16. INTANGIBLE ASSETS*

	31 Desember/ *December 31,* 2023						
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Deductions***	**Kapitalisasi/ *Capitalisation***	**Reklasifikasi/ *Reclassification***	**Saldo akhir/ *Ending balance***	
Biaya Perolehan	16.530.098	7.289.250	-	-	-	23.819.348	*Acquisition Cost*
Dikurangi: Akumulasi amortisasi	(13.998.914)	(1.627.621)	-	-	-	(15.626.535)	*Less: Accumulated amortisation*
Nilai buku	**2.531.184**					**8.192.813**	***Net book value***

	31 Desember/ *December 31,* 2022						
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Deductions*)***	**Kapitalisasi/ *Capitalisation***	**Reklasifikasi/ *Reclassification***	**Saldo akhir/ *Ending balance***	
Biaya Perolehan	22.680.126	1.879.808	(8.029.836)	-	-	16.530.098	*Acquisition Cost*
Dikurangi: Akumulasi amortisasi	(19.485.950)	(1.538.595)	7.025.631	-	-	(13.998.914)	*Less: Accumulated amortisation*
Nilai buku	**3.194.176**					**2.531.184**	***Net book value***

*) Termasuk dalam pengurangan adalah dampak kehilangan pengendalian atas entitas anak

Include in deductions is the impact of loss of control (on subsidiary*

16. ASET TAK BERWUJUD (lanjutan)

Aset tak berwujud yang dimiliki oleh Bank berupa lisensi aplikasi yang dibeli oleh Bank.

Amortisasi yang dicatat oleh Bank masing-masing sebesar Rp1.627.621 dan Rp1.538.595 untuk tahun yang berakhir pada tanggal 31 Desember 2023 dan 2022 (Catatan 33).

Berdasarkan penelaahan manajemen, tidak terdapat kejadian atau perubahan keadaan yang mengindikasikan adanya penurunan nilai aset tak berwujud pada tanggal 31 Desember 2023 dan 2022.

16. INTANGIBLE ASSETS (continued)

Intangible assets held by the Bank is application license purchased by the Bank.

Amortisation recorded by the Bank amounted to Rp1,627,621 and Rp1,538,595 the years ended December 31, 2023 and 2022, respectively (Note 33).

Based on the management assessment, there are no events or changes in circumstances indicating an impairment of intangible assets as of December 31, 2023 and 2022.

17. ASET LAIN-LAIN / *17. OTHER ASSETS*

	31 Desember/*December 31*,		
	2023	**2022**	
Uang muka pada pihak ketiga	43.213.258	26.570.414	*Advance payment to third parties*
Properti terbengkalai	33.794.570	36.158.934	*Abandoned property*
Uang jaminan	7.941.619	6.359.307	*Security deposits*
Tagihan pihak ketiga	4.853.701	13.893.797	*Receivables from third parties*
Lain-lain	14.016.665	19.296.564	*Others*
	103.819.813	102.279.016	
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(12.356.770)	(14.323.476)	*Allowance for impairment losses*
Jumlah	**91.463.043**	**87.955.540**	***Total***

Uang jaminan merupakan uang yang disetor sebagai jaminan untuk sewa gedung kantor.

Security deposits represent deposit pledged as guarantee for building rental.

Lain-lain terutama terdiri dari tagihan transaksi valuta asing, tagihan biaya administrasi dan persediaan barang promosi.

Others mainly consists of foreign exchange transaction, administrative expense transaction and promotion inventories.

Mutasi cadangan kerugian penurunan nilai untuk aset lain-lain adalah sebagai berikut:

The changes in allowance for impairment losses of other assets are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Saldo awal	**14.323.476**	**13.017.686**	***Beginning balance***
Penambahan/(Pengurangan) selama tahun berjalan	(1.966.706)	1.305.790	*Addition/(deduction) during the year*
Saldo akhir	**12.356.770**	**14.323.476**	***Ending balance***

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang telah dibentuk cukup untuk menutup kemungkinan kerugian atas aset lain-lain.

Management believes that the allowance for impairment losses is adequate to cover possible losses from other assets.

18. SIMPANAN NASABAH / *18. DEPOSITS FROM CUSTOMERS*

Semua simpanan nasabah dalam mata uang Rupiah dan mata uang asing, terdiri dari:

All deposits from customers in Rupiah and foreign currency, consist of:

	31 Desember/*December 31*,		
	2023	**2022**	
Rupiah			***Rupiah***
Negotiable Certificate Deposits	440.000.000	220.000.000	*Negotiable Certificate Deposit*
Dikurangi:			*Less*:
Diskonto	(42.800.790)	(7.978.260)	*Discount*
Beban emisi yang belum diamortisasi	(2.890.637)	(1.180.843)	*Unamortized issuance cost*
Deposito berjangka	16.044.264.144	13.158.803.446	*Time deposits*
Tabungan	2.881.781.337	3.148.224.256	*Savings deposits*
Giro	2.417.884.361	2.318.053.678	*Demand deposits*
Sub jumlah	**21.738.238.415**	**18.835.922.277**	***Sub total***
Mata uang asing			***Foreign currency***
Deposito berjangka	624.320.546	470.087.691	*Time deposits*
Giro	66.621.531	65.827.669	*Demand deposits*
Sub jumlah	**690.942.077**	**535.915.360**	***Sub total***
Jumlah	**22.429.180.492**	**19.371.837.637**	***Total***

Simpanan nasabah dalam mata uang asing adalah Dolar Amerika Serikat, Dolar Singapura, Euro Eropa, dan Yen Jepang.

All deposits from customers in foreign currency are denominated in United States Dollar, Singapore Dollar, European Euro, and Japanese Yen.

a. Giro / *a. Demand Deposits*

i. Berdasarkan pihak lawan / *i. By counterparties*

	31 Desember/*December 31*,		
	2023	**2022**	
Pihak berelasi	652.841.415	246.769.560	*Related parties*
Pihak ketiga	1.831.664.477	2.137.111.787	*Third parties*
Jumlah	**2.484.505.892**	**2.383.881.347**	***Total***

ii. Berdasarkan mata uang / *ii. By currency*

	31 Desember/*December 31*,		
	2023	**2022**	
Rupiah	2.417.884.361	2.318.053.678	*Rupiah*
Dolar Amerika	60.590.713	60.167.684	*United States Dollar*
Yen Jepang	2.576.994	2.391.190	*Japanese Yen*
Dolar Singapura	1.902.282	398.745	*Singapore Dollar*
Euro Eropa	1.551.542	2.870.050	*European Euro*
Jumlah	**2.484.505.892**	**2.383.881.347**	***Total***

18. SIMPANAN NASABAH (lanjutan) / *18. DEPOSITS FROM CUSTOMERS (continued)*

a. Giro (lanjutan) / *a. Demand Deposits (continued)*

Giro yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2023 dan 2022 masing-masing sebesar Rp320.546.300 dan Rp118.115.313 (Catatan 11).

Demand deposits amounting to Rp320,546,300 and Rp118,115,313 pledged as collateral or blocked as of December 31, 2023 and 2022, respectively (Note 11).

b. Tabungan / *b. Savings deposits*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember/*December 31*,		
	2023	**2022**	
Rupiah			***Rupiah***
Pihak ketiga	2.853.784.424	3.093.821.476	*Third parties*
Pihak berelasi	27.996.913	54.402.780	*Related parties*
Jumlah	**2.881.781.337**	**3.148.224.256**	***Total***

Tabungan yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2023 dan 2022 masing-masing sebesar Rp149.150.000 dan RpNihil (Catatan 11).

Saving deposits amounting to Rp149,000,000 and RpNil pledged as collateral or blocked as of December 31, 2023 and 2022, respectively (Note 11).

c. Deposito berjangka / *c. Time deposits*

(i) Berdasarkan pihak lawan / *(i) By counterparties*

	31 Desember/*December 31*,		
	2023	**2022**	
Pihak ketiga	16.049.699.818	13.544.452.999	*Third parties*
Pihak berelasi	618.884.872	84.438.138	*Related parties*
Jumlah	**16.668.584.690**	**13.628.891.137**	***Total***

(ii) Berdasarkan mata uang / *(ii) By currency*

	31 Desember/*December 31*,		
	2023	**2022**	
Rupiah	16.044.264.144	13.158.803.446	*Rupiah*
Dolar Amerika	624.320.546	470.087.691	*United States Dollar*
Jumlah	**16.668.584.690**	**13.628.891.137**	***Total***

(iii) Berdasarkan periode / *(iii) By period*

	31 Desember/*December 31*,		
	2023	**2022**	
1 bulan	7.144.058.086	6.310.057.619	*1 month*
3 bulan	4.512.705.040	3.237.056.658	*3 months*
6 bulan	3.608.059.929	2.885.771.283	*6 months*
12 bulan	1.403.761.635	1.196.005.577	*12 months*
Jumlah	**16.668.584.690**	**13.628.891.137**	***Total***

18. SIMPANAN NASABAH (lanjutan) / *18. DEPOSITS FROM CUSTOMERS (continued)*

c. Deposito berjangka (lanjutan) / *c. Time deposits (continued)*

(iv) Berdasarkan sisa umur sampai dengan jatuh tempo / *(iv) By remaining period until maturity*

	31 Desember/*December 31*,		
	2023	**2022**	
Kurang dari 1 bulan	8.757.247.243	7.383.867.327	*Less than 1 month*
1 sampai dengan 3 bulan	4.371.648.337	3.515.512.381	*1 up to 3 months*
3 sampai dengan 6 bulan	2.680.083.163	1.793.418.376	*3 up to 6 months*
6 sampai dengan 12 bulan	859.605.947	936.093.053	*6 up to 12 months*
Jumlah	**16.668.584.690**	**13.628.891.137**	***Total***

Deposito berjangka yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2023 dan 2022 masing-masing adalah sebesar Rp1.719.715.512 dan Rp707.564.744 (Catatan 11).

Time deposits which are pledged as collateral on loans as of December 31, 2023 and 2022 amounted to Rp1,719,715,512 and Rp707,564,744, respectively (Note 11).

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 45.

Informations respect to interest rate are disclosed in Note 45.

d. *Negotiable Certificate Deposits* / *d. Negotiable Certificate Deposits*

	31 Desember/*December 31*,		
	2023	**2022**	
Pihak ketiga			***Third parties***
Negotiable Certificate Deposits	329.600.000	218.200.000	*Negotiable Certificate Deposit*
Dikurangi :			*Less*:
Diskonto	(31.372.904)	(7.904.752)	*Discount*
Beban emisi yang belum diamortisasi	(2.165.350)	(1.171.182)	*Unamortized issuance cost*
Sub jumlah	296.061.746	209.124.066	*Sub total*
Pihak berelasi			***Related parties***
Negotiable Certificate Deposits	110.400.000	1.800.000	*Negotiable Certificate Deposit*
Dikurangi :			*Less*:
Diskonto	(11.427.886)	(73.508)	*Discount*
Beban emisi yang belum diamortisasi	(725.287)	(9.661)	*Unamortized issuance cost*
Sub jumlah	98.246.827	1.716.831	*Sub total*
Jumlah	**394.308.573**	**210.840.897**	***Total***

Bank melakukan penerbitan *Negotiable Certificate of Deposit* (NCD) pada tanggal 5 September 2023 sebesar Rp440.000.000 yang terbagi dua seri, yaitu seri A dengan nilai sebesar Rp50.000.000 dengan suku bunga 6,5% dan jatuh tempo pada tanggal 5 September 2024 dan seri B dengan nilai sebesar Rp390.000.000 dengan suku bunga 7% dan jatuh tempo pada tanggal 5 September 2025.

The bank issues a Negotiable Certificate of Deposit (NCD) on September 5, 2023, amounting to Rp440,000,000 which is divided into two series, namely series A with a value of Rp50,000,000 with an interest rate of 6.5% and due on September 5, 2024, and series B with a value of Rp390,000,000 with an interest rate of 7% and due on September 5, 2025.

18. SIMPANAN NASABAH (lanjutan) / *18. DEPOSITS FROM CUSTOMERS (continued)*

d. *Negotiable Certificate Deposits* (lanjutan) / *d. Negotiable Certificate Deposits (continued)*

Bank melakukan penerbitan *Negotiable Certificate of Deposit* (NCD) pada tanggal 1 September 2022 sebesar Rp220.000.000 yang terbagi dua seri, yaitu seri A dengan nilai sebesar Rp60.000.000 dengan suku bunga 6% dan jatuh tempo pada tanggal 1 Juni 2023 dan seri B dengan nilai sebesar Rp160.000.000 dengan suku bunga 6,5% dan jatuh tempo pada tanggal 30 Agustus 2023.

Bank has issued a Negotiable Certificate of Deposit (NCD) on September 1, 2022 amounting to Rp220,000,000 which was divided into two series, namely series A with an interest value of Rp60,000,000 with an interest rate of 6% and due on June 1, 2023 and series B with a value of amounting to Rp160,000,000 with an interest rate of 6.5% and due on August 30, 2023.

Negotiable Certificate of Deposit (NCD) *which are pledged as collateral on loans as of December 31, 2023 and 2022 amounted to Rp116,900,000 and RpNil, respectively (Note 11).*

Negotiable Certificate of Deposit (NCD) yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2023 dan 2022 masing-masing adalah sebesar Rp116.900.000 dan RpNihil (Catatan 11).

19. SIMPANAN DARI BANK LAIN / *19. DEPOSITS FROM OTHER BANKS*

Semua simpanan dari bank lain adalah dalam mata uang Rupiah dan terdiri dari:

All deposits from other banks are denominated in Rupiah and consist of:

	31 Desember/*December 31*,		
	2023	**2022**	
Call money	792.000.000	1.030.000.000	*Call money*
Giro	219.401.707	224.055.952	*Demand deposits*
Deposito berjangka	49.531.350	46.454.518	*Time deposits*
Tabungan	41.963.642	31.442.150	*Savings deposits*
Deposito on call	1.906.660	3.000.000	*Deposits on call*
Jumlah	**1.104.803.359**	**1.334.952.620**	***Total***

a. *Call money* / *a. Call money*

(i) Berdasarkan pihak lawan / *(i) By counterparties*

	31 Desember/*December 31*,		
	2023	**2022**	
Pihak ketiga			***Third parties***
PT Bank Pembangunan Daerah Sulawesi Selatan dan Tengah	220.000.000	285.000.000	*PT Bank Pembangunan Daerah Sulawesi Selatan dan Tengah*
PT Bank Pembangunan Daerah Kaltim	200.000.000	95.000.000	*PT Bank Pembangunan Daerah Kaltim*
PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta	150.000.000	100.000.000	*PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta*
PT Bank Pembangunan Daerah Maluku	100.000.000	-	*PT Bank Pembangunan Daerah Maluku*
PT Bank Ina Perdana Tbk	100.000.000	-	*PT Bank Ina Perdana Tbk*
PT Bank Pembangunan Daerah Jawa Timur Tbk	22.000.000	-	*PT Bank Pembangunan Daerah Jawa Timur Tbk*
PT Bank Panin Tbk	-	200.000.000	*PT Bank Panin Tbk*
PT Bank Jtrust Tbk	-	100.000.000	*PT Bank Jtrust Tbk*
PT Bank IBK Indonesia Tbk	-	100.000.000	*PT Bank IBK Indonesia Tbk*
PT Bank Sinarmas	-	50.000.000	*PT Bank Sinarmas*
PT Bank Seabank Indonesia	-	50.000.000	*PT Bank Seabank Indonesia*
PT Bank Capital Indonesia Tbk	-	50.000.000	*PT Bank Capital Indonesia Tbk*
Jumlah	**792.000.000**	**1.030.000.000**	***Total***

19. SIMPANAN DARI BANK LAIN (lanjutan) / *19. DEPOSITS FROM OTHER BANKS (continued)*

a. *Call money* (lanjutan) / *a. Call money (continued)*

(ii) Berdasarkan periode / *(ii) By period*

	31 Desember/*December 31*,		
	2023	**2022**	
Kurang dari 1 bulan	792.000.000	1.030.000.000	*Less than 1 month*
Jumlah	**792.000.000**	**1.030.000.000**	***Total***

b. Deposito berjangka / *b. Time deposits*

(i) Berdasarkan pihak lawan / *(i) By counterparties*

	31 Desember/*December 31*,		
	2023	**2022**	
Pihak ketiga	49.531.350	46.454.518	*Third parties*

(ii) Berdasarkan periode / *(ii) By period*

	31 Desember/*December 31*,		
	2023	**2022**	
1 bulan	22.031.350	24.454.518	*1 month*
3 bulan	24.500.000	19.000.000	*3 months*
6 bulan	-	-	*6 months*
12 bulan	3.000.000	3.000.000	*12 months*
Jumlah	**49.531.350**	**46.454.518**	***Total***

(iii) Berdasarkan sisa umur sampai dengan jatuh tempo / *(iii) By remaining period until maturity*

	31 Desember/*December 31*,		
	2023	**2022**	
Kurang dari 1 bulan	22.031.350	24.454.518	*Less than 1 month*
1 sampai dengan 3 bulan	24.500.000	21.000.000	*1 up to 3 months*
3 sampai dengan 6 bulan	2.000.000	-	*3 up to 6 months*
6 sampai dengan 12 bulan	1.000.000	1.000.000	*6 up to 12 months*
Jumlah	**49.531.350**	**46.454.518**	***Total***

c. Giro / *c. Demand deposits*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember/*December 31*,		
	2023	**2022**	
Pihak berelasi	478.732	167.870	*Related party*
Pihak ketiga	218.922.975	223.888.082	*Third party*
Jumlah	**219.401.707**	**224.055.952**	***Total***

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 45.

Informations in respect to interest rates are disclosed in Note 45.

19. SIMPANAN DARI BANK LAIN (lanjutan) / *19. DEPOSITS FROM OTHER BANKS (continued)*

d. Tabungan / *d. Saving deposits*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember/*December 31*,		
	2023	**2022**	
Pihak ketiga	41.963.642	31.442.150	*Third parties*

Pada tanggal 31 Desember 2023 dan 2022, tidak terdapat saldo tabungan dari pihak berelasi.

As of December 31, 2023 and 2022 there are no saving deposits from related parties.

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 45.

Informations in respect to interest rates are disclosed in Note 45.

20. EFEK-EFEK YANG DIJUAL DENGAN JANJI DIBELI KEMBALI / *20. SECURITIES SOLD UNDER REPURCHASED AGREEMENTS*

Efek-efek yang dijual dengan janji dibeli kembali pada tanggal 31 Desember 2023 dan 2022 adalah sebagai berikut:

The securities sold under repurchased agreements as of December 31, 2023 and 2022 are as follows:

31 Desember / *December 31*, 2023

Pihak lawan/ *Counterparty*	Jenis efek/ *Type of Securities*	Nilai Nominal/ *Notional amount*	Tingkat suku bunga/ *Interest rate*	Tanggal dimulai/ *Commencement date*	Tanggal jatuh tempo/ *Maturity date*	Nilai tercatat/ *Carrying amount*
Bank Mega	FR0070	250.000.000	6,35%	20 Desember/ *December* 2023	3 Januari/ *January 2024*	251.618.623
Bank Mega	FR0077	250.000.000	6,35%	20 Desember/ *December* 2023	3 Januari/ *January 2024*	248.598.483
Ina Perdana	FR0081	100.000.000	6,25%	29 Desember/ *December* 2023	3 Januari/ *January 2024*	95.366.417
Ina Perdana	FR0081	50.000.000	6,25%	29 Desember/ *December* 2023	3 Januari/ *January 2024*	47.683.207
		650.000.000				**643.266.730**

31 Desember / *December 31*, 2022

Pihak lawan/ *Counterparty*	Jenis efek/ *Type of Securities*	Nilai Nominal/ *Notional amount*	Tingkat suku bunga/ *Interest rate*	Tanggal dimulai/ *Commencement date*	Tanggal jatuh tempo/ *Maturity date*	Nilai tercatat/ *Carrying amount*
Ina Perdana	FR0082	90.000.000	5,80%	27 Desember/ *December* 2022	3 Januari/ *January 2023*	86.066.513
Ina Perdana	FR0059	80.000.000	5,80%	27 Desember/ *December* 2022	3 Januari/ *January 2023*	76.506.026
Ina Perdana	FR0084	80.000.000	5,80%	27 Desember/ *December* 2022	3 Januari/ *January 2023*	78.292.621
		250.000.000				**240.865.160**

21. EFEK-EFEK YANG DITERBITKAN / *21. SECURITIES ISSUED*

	31 Desember/*December 31*,		
	2023	**2022**	
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018	350.000.000	350.000.000	*Bank Victoria Subordinated Bonds I Phase II Year 2018*
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri A	300.000.000	-	*Bank Victoria Continuing Bonds III Phase I Year 2023 Series A*
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019	250.000.000	250.000.000	*Bank Victoria Subordinated Bonds II Phase I Year 2019*
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri B	200.000.000	-	*Bank Victoria Continuing Bonds III Phase I Year 2023 Series B*
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019	150.000.000	150.000.000	*Bank Victoria Subordinated Bonds II Phase II Year 2019*
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020	60.000.000	60.000.000	*Bank Victoria Subordinated Bonds II Phase III Year 2020*
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017	50.000.000	50.000.000	*Bank Victoria Subordinated Bonds I Phase I Year 2017*
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 Seri B	-	200.000.000	*Bank Victoria Continuing Bonds I Phase II Year 2018 Series B*
Jumlah	**1.360.000.000**	**1.060.000.000**	***Total***
Dikurangi: Biaya emisi yang belum diamortisasi	(12.360.472)	(8.096.448)	*Less: Unamortised issuance cost*
Jumlah - bersih	**1.347.639.528**	**1.051.903.552**	***Total - net***

Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023

Pada tanggal 10 Maret 2023, Bank menerbitkan Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 sebesar Rp500.000.000.

Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 terdiri dari 2 (dua) seri Obligasi, yaitu sebagai berikut:

- Seri A dengan jumlah Pokok Obligasi sebesar Rp300.000.000 dengan tingkat suku bunga tetap sebesar 9,25% per tahun, berjangka waktu 3 (tiga) tahun sejak Tanggal Emisi.
- Seri B dengan jumlah Pokok Obligasi sebesar Rp200.000.000 dengan tingkat bunga tetap sebesar 10,25% per tahun, berjangka waktu 5 (lima) tahun sejak Tanggal Emisi.

Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali. Pembayaran bunga obligasi pertama dilakukan pada tanggal 9 Juni 2023 sedangkan pembayaran bunga Obligasi terakhir akan dilakukan pada tanggal jatuh tempo masing-masing seri Obligasi yaitu pada tanggal 9 Maret 2026 untuk Obligasi Seri A dan 9 Maret 2028 untuk Obligasi Seri B.

Bank Victoria Continuing Bonds III Phase I Year 2023

On March 10, 2023, the Bank issued Bank Victoria Continuing Bonds III Phase I Year 2023 amounting to Rp500,000,000.

Bank Victoria Continuing Bonds III Phase I Year 2023 consists of 2 (two) series of Bonds:

- *Series A amounted to Rp300,000,000 with fixed rate of 9.25% per annum, tenor 3 (three) years since Emission Date.*
- *Series B amounted to Rp200,000,000 with fixed rate of 10.25% per annum, tenor 5 (five) years since Emission Date.*

Interest of the bond paid every 3 (three) months starting from June 9, 2023 for the first payment whereas the last payment will be at the maturity date of each Bonds, which on March 9, 2026 for Bonds Series A and on March 9, 2028 for Bonds Series B.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 (lanjutan)

Berdasarkan pemeringkatan yang dilaksanakan oleh Pefindo sesuai dengan Surat No.RC-1230/PEF-DIR/XII/2022 tanggal 26 Desember 2022 tentang Sertifikat Pemeringkatan atas Obligasi Berkelanjutan III Bank Victoria Tahun 2023 periode 26 Desember 2022 sampai dengan 1 Desember 2023, hasil pemeringkatan atas Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 adalah idA-.

Pada tanggal 31 Desember 2023, peringkat Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 menurut Pefindo adalah idA-.

Obligasi dan obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2023 dan 2022.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020

Pada tanggal 13 Maret 2020 Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 dengan jumlah pokok sebanyak-banyaknya sebesar Rp60.000.000.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 memiliki tingkat suku bunga tetap sebesar 11,25% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi Subordinasi pertama dilakukan pada tanggal 1 Juli 2020, sedangkan pembayaran bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 1 April 2027.

21. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds III Phase I Year 2023 (continued)

Based on the ranking carried out by Pefindo in accordance with Letter No.RC-1230/PEF-DIR/XII/2022 dated December 26, 2022, regarding the Rating Certificate for the third phase of Bank Victoria Continuing Bonds Year 2023, for the period of December 26, 2022, to December 1, 2023, the result of the ranking for the first phase of Bank Victoria Continuing Bonds III for 2023 is idA-.

As of December 31, 2023, the rating of the Bank Victoria Continuing Bonds III Phase I Year 2023 based on Pefindo was idA-.

The above bonds and subordinated bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2023 and 2022.

Bank Victoria Subordinated Bonds II Phase III Year 2020

On March 13, 2020, the Bank issued Bank Victoria Subordinated Bonds II Phase III Year 2020 with a principal amount up to Rp60,000,000.

Bank Victoria Subordinated Bonds II Phase III Year 2020 has fixed rate of 11.25% per annum, and the interest will be paid every 3 (three) months starting from July 1, 2020 for the first payment whereas the last payment will be on April 1, 2027, at the maturity date of the Bond.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 (lanjutan)

Berdasarkan hasil pemeringkatan surat utang jangka panjang sesuai dengan surat PT Pemeringkat Efek Indonesia (Pefindo) No. RC-329/PEF-DIR/IV/2019 tanggal 4 April 2019 tentang Sertifikat Pemeringkatan Obligasi Subordinasi Berkelanjutan II dari PT Bank Victoria International Tbk sejak 4 April 2019 sampai dengan 1 April 2020, serta konfirmasi sesuai dengan surat Pefindo No. RTG-020/PEF-DIR/II/2020 tanggal 4 Februari 2020 perihal Sertifikat Pemeringkatan Obligasi Subordinasi Berkelanjutan II Tahap III yang diterbitkan melalui rencana Penawaran Umum Berkelanjutan PUB, hasil pemeringkatan Obligasi Subordinasi adalah idBBB.

Pada tanggal 31 Desember 2023 dan 2022, peringkat Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 menurut Pefindo adalah idBBB.

Obligasi subordinasi di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi subordinasi ini adalah PT Bank Mega Tbk. Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2023 dan 2022.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019

Pada tanggal 8 November 2019, Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 sebesar Rp150.000.000.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 memiliki tingkat suku bunga tetap sebesar 11,25% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi Subordinasi pertama dilakukan pada tanggal 8 Februari 2020, sedangkan pembayaran bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 8 November 2026.

21. SECURITIES ISSUED (continued)

Bank Victoria Subordinated Bonds II Phase III Year 2020 (continued)

Based on the results of the rating for long-term debt securities in accordance with PT Pemeringkat Efek Indonesia (Pefindo) letter No. RC-329/PEF-DIR/IV/2019 dated April 4, 2019 regarding a Rating Certificate for Continuous Subordinated Bond II of PT Bank Victoria International Tbk from April 4, 2019 to April 1, 2020, as well as the confirmation according to Pefindo letter No. RTG-020/PEF-DIR/II/2020 dated February 4, 2020 regarding the Rating Certificate for Continuous Subordinated Bonds II Phase III issued through the PUB Continuous Public Offering plan, the rating results of the Subordinated Bonds are idBBB.

As of December 31, 2023 and 2022, the rating of the Bank Victoria Subordinated Bonds II Phase III Year 2020 based on Pefindo was idBBB.

The subordinated bonds is unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk. There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2023 and 2022.

Bank Victoria Subordinated Bonds II Phase II Year 2019

On November 8, 2019, the Bank issued Bank Victoria Subordinated Bonds II Phase II Year 2019 amounting Rp150,000,000.

Bank Victoria Subordinated Bonds II Phase II Year 2019 has fixed rate of 11.25% per annum, and the interest will be paid every 3 (three) months starting from February 8, 2020 for the first payment whereas the last payment will be on November 8, 2026, at the maturity date of the Bond.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 (lanjutan)

Berdasarkan Surat Keterangan PT Pemeringkat Efek Indonesia ("Pefindo") No. RTG-129/PEF-DIR/IX/2019 tanggal 26 September 2019 berlaku peringkat sebagaimana tercantum pada Sertifikat Pemeringkatan PT Pemeringkat Efek Indonesia No. RC-329/PEF-DIR/IV/2019 tanggal 4 April 2019 yaitu peringkat idBBB pada Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019.

Pada tanggal 31 Desember 2023 dan 2022, peringkat Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 menurut Pefindo adalah idBBB.

Obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi subordinasi ini adalah PT Bank Mega Tbk. Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi subordinasi pada tanggal 31 Desember 2023 dan 2022.

Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019

Pada tanggal 28 September 2019, Bank menerbitkan Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 masing-masing sebesar Rp100.000.000 dan Rp250.000.000.

Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 diterbitkan dengan tingkat suku bunga tetap sebesar 9,75% per tahun, berjangka waktu 2 (dua) tahun sejak Tanggal Emisi.

Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali terhitung sejak Tanggal Emisi. Pembayaran Bunga Obligasi pertama dilakukan pada tanggal 28 September 2019, sedangkan pembayaran Bunga obligasi terakhir akan dilakukan pada tanggal jatuh tempo obligasi yaitu pada tanggal 28 September 2021.

21. SECURITIES ISSUED (continued)

Bank Victoria Subordinated Bonds II Phase II Year 2019 (continued)

Based on the letter issued by PT Pemeringkat Efek Indonesia ("Pefindo") No. RTG-129/PEF-DIR/IX/2019 dated September 26, 2019 apply rating as stated on Rating Certificate PT Pemeringkat Efek Indonesia No. RC-329/PEF-DIR/IV/2019 dated April 4, 2019 which was idBBB on Bank Victoria Subordinated Bonds II Phase II Year 2019.

As of December 31, 2023 and 2022, the rating of the Bank Victoria Subordinated Bonds II Phase II Year 2019 based on Pefindo was idBBB.

The above bond is unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk. There was no violation to the covenant of the subordinated bonds trusteeship agreement as of December 31, 2023 and 2022.

Bank Victoria Continuing Bonds II Phase I Year 2019 and Subordinated Bonds II Phase I Year 2019

On September 28, 2019, the Bank issued Bank Victoria Continuing Bonds II Phase I Year 2019 and Subordinated Bonds II Phase I Year 2019 amounting to Rp100,000,000 and Rp250,000,000, respectively.

Bank Victoria Continuing Bonds II Phase I Year 2019 issued with fixed rate of 9.75% per annum, with tenor 2 (two) years since Emission Date.

Interest on the bonds will be paid every 3 (three) months starting from Emission Date. The first payment was on September 28, 2019 whereas the last payment will be on September 28, 2021, at the maturity date of the Bond.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 (lanjutan)

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 memiliki tingkat suku bunga tetap sebesar 11,75% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran Bunga Obligasi Subordinasi pertama dilakukan pada tanggal 28 September 2019, sedangkan pembayaran Bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 28 Juni 2026.

Berdasarkan Sertifikat Pemeringkatan Pefindo No. RC-328/PEF-DIR/IV/2019 dan No. RC-329/PEF-DIR/IV/2019 tanggal 4 April 2019, memutuskan memberikan peringkat idA- terhadap Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 serta memberikan peringkat idBBB pada Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019.

Pada tanggal 31 Desember 2021, peringkat Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 menurut Pefindo adalah idA-.

Pada tanggal 31 Desember 2023 dan 2022, peringkat Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 menurut Pefindo adalah idBBB.

Obligasi dan obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi dan obligasi subordinasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2023 dan 2022.

Pada tanggal 5 September 2018, Bank menerbitkan Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 masing-masing sebesar Rp300.000.000 dan Rp350.000.000.

21. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds II Phase I Year 2019 and Subordinated Bonds II Phase I Year 2019 (continued)

Bank Victoria Subordinated Bonds II Phase I Year 2019 has fixed rate of 11.75% per annum, and the interest will be paid every 3 (three) months. The first payment was on September 28, 2019, whereas the last payment will be on June 28, 2026, at the maturity date of the Bond.

Based on the report issued by Pefindo No. RC-328/PEF-DIR/IV/2019 and No. RC-329/PEF-DIR/IV/2019 dated April 4, 2019, the rating of Bank Victoria Continuing Bonds II Phase I Year 2019 is idA-, and the rating of Subordinated Bonds II Phase I Year 2019 is idBBB.

As of December 31, 2021, the rating of the Bank Victoria Continuing Bonds II Phase I Year 2019 based on Pefindo was idA-.

As of December 31, 2023 and 2022, the rating of the Bank Victoria Subordinated Bonds II Phase I Year 2019 based on Pefindo was idBBB.

The above bonds and subordinated bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bonds and subordinated bonds issuance is PT Bank Mega Tbk.

There was no violation to the covenant of the bonds and subordinated bonds trusteeship agreement as of December 31, 2023 and 2022.

On September 5, 2018, the Bank issued Bank Victoria Continuing Bonds I Phase II Year 2018 and Bank Victoria Subordinated Bonds I Phase II Year 2018 amounting to Rp300,000,000 and Rp350,000,000, respectively.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II 2018

Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 terdiri dari 2 (dua) seri Obligasi, yaitu sebagai berikut:

- Seri A dengan jumlah Pokok Obligasi sebesar Rp100.000.000 dengan tingkat suku bunga tetap sebesar 9,70% per tahun, berjangka waktu 3 (tiga) tahun sejak Tanggal Emisi.
- Seri B dengan jumlah Pokok Obligasi sebesar Rp200.000.000 dengan tingkat bunga tetap sebesar 10,30% per tahun, berjangka waktu 5 (lima) tahun sejak Tanggal Emisi.

Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali. Pembayaran bunga obligasi pertama dilakukan pada tanggal 5 September 2018 sedangkan pembayaran bunga Obligasi terakhir akan dilakukan pada tanggal jatuh tempo masing-masing seri Obligasi yaitu pada tanggal 5 September 2021 untuk Obligasi Seri A dan 5 September 2023 untuk Obligasi Seri B.

Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 memiliki tingkat suku bunga tetap sebesar 11,00% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran Bunga Obligasi Subordinasi pertama dilakukan pada tanggal 5 September 2018, sedangkan pembayaran Bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 5 Juni 2025.

Berdasarkan surat keterangan yang diberikan oleh Pefindo No. 031/PEWF-DIR/IV/2018 pada 2 April 2018, keterangan terkait pemeringkatan atas Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 yang diterbitkan melalui rencana Penawaran Umum Berkelanjutan (PUB) terdapat pada surat Sertifikat Pemeringkatan No. 369/PEF-DIR/IV/2018 tanggal 2 April 2018 atas penetapan kembali peringkat Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 yang juga merupakan pemeringkatan atas Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 (berdasarkan pemantauan atas Obligasi Berkelanjutan I Tahun 2017) yakni idA- dan pada surat Sertifikat Pemeringkatan No. 370/PEF-DIR/IV/2018 tanggal 2 April 2018 atas Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I 2017 yang juga merupakan pemeringkatan atas Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II 2018 yakni idBBB.

21. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds I Phase II Year 2018 and Subordinated Bonds I Phase II Year 2018

Bank Victoria Continuing Bonds I Phase II Year 2018 consists of 2 (two) series of Bonds:

- *Series A amounted to Rp100,000,000 with fixed rate of 9.70% per annum, tenor 3 (three) years since Emission Date.*
- *Series B amounted to Rp200,000,000 with fixed rate of 10.30% per annum, tenor 5 (five) years since Emission Date.*

Interest of the bond paid every 3 (three) months starting from September 5, 2018 for the first payment whereas the last payment will be at the maturity date of each Bonds, which on September 5, 2021 for Bonds Series A and on September 5, 2023 for Bonds Series B.

Bank Victoria Subordinated Bonds I Phase II Year 2018 has fixed rate of 11.00% per annum, and the interest will be paid every 3 (three) months. The first payment was on September 5, 2018 whereas the last payment will be on June 5, 2025, at the maturity date of the Bonds and Subordinated Bonds.

Based on the letter issued by Pefindo No. 031/PEWF-DIR/IV/2018 dated April 2, 2018, the details related to the rating of Bank Victoria Continuing Bonds I Phase II Year 2018 and Bank Victoria Subordinated Bonds I Phase II Year 2018 which was issued through Share Registration Public Offering (PUB) were available in the Rating Certificate No. 369/PEF-DIR/IV/2018 dated April 2, 2018 regarding the reassessment of Bank Victoria Continuing Bonds I Phase I Year 2017 rating, including the assessment of Bank Victoria Continuing Bonds I Phase II Year 2018 rating which was idA- and in the Rating Certificate No. 370/PEF-DIR/IV/2018 dated April 2, 2018 regarding the reassessment of Bank Victoria Subordinated Bonds I Phase I Year 2017, including the assessment of Bank Victoria Subordinated Bonds I Phase II Year 2018 which was idBBB.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II 2018 (lanjutan)

Pada tanggal 31 Desember 2023 dan 2022, peringkat Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 menurut Pefindo adalah idA-.

Pada tanggal 31 Desember 2023 dan 2022, peringkat Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II 2018 menurut Pefindo adalah idBBB.

Obligasi dan obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2023 dan 2022.

Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017

Pada tanggal 11 Juli 2017, Bank menerbitkan Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 masing-masing sebesar Rp300.000.000 dan Rp50.000.000.

Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 memiliki tingkat suku bunga tetap sebesar 10,30% sebesar Rp300.000.000 per tahun, yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga pertama dilakukan pada tanggal 11 Oktober 2017 sedangkan pembayaran bunga obligasi terakhir yang sekaligus telah jatuh tempo obligasi akan dilakukan pada tanggal 11 Juli 2022.

Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 memiliki tingkat suku bunga tetap sebesar 11,00% per tahun, yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga pertama dilakukan pada tanggal 11 Oktober 2017 sedangkan pembayaran bunga obligasi terakhir yang sekaligus menjadi tanggal jatuh tempo obligasi akan dilakukan pada tanggal 11 Juli 2024.

21. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds I Phase II Year 2018 and Subordinated Bonds I Phase II Year 2018 (continued)

As of December 31, 2023 and 2022, the rating of the Bank Victoria Continuing Bonds I Phase II Year 2018 based on Pefindo was idA-.

As of December 31, 2023 and 2022, the rating of the Bank Victoria Subordinated Bonds I Phase II Year 2018 based Pefindo was idBBB.

The above bonds and subordinated bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2023 and 2022.

Bank Victoria Continuing Bonds I Phase I Year 2017 and Subordinated Bonds I Phase I Year 2017

On July 11, 2017, the Bank issued Bank Victoria Continuing Bonds I Phase I Year 2017 and Bank Victoria Subordinated Bonds I Phase I Year 2017 amounting to Rp300,000,000 and Rp50,000,000, respectively.

Bank Victoria Continuing Bonds I Phase I Year 2017 has fixed rate of 10.30% amounted Rp300.000.000 per annum, and the interest will be paid every 3 (three) months. The first payment was on from October 11, 2017 whereas the last payment matured on July 11, 2022, at the maturity date of the Bond.

Bank Victoria Subordinated Bonds I Phase I Year 2017 has fixed rate of 11.00% per annum, and the interest will be paid every 3 (three) months. The first payment was on October 11, 2017 whereas the last payment will be on July 11, 2024, at the maturity date of the Bond.

21. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 (lanjutan)

Berdasarkan pemeringkatan yang dilaksanakan oleh Pefindo sesuai dengan Surat No. 369/PEF-Dir/IV/2018 tanggal 2 April 2018, hasil pemeringkatan atas Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 adalah idA- dan Surat No. 370/PEF-Dir/IV/2018 tanggal 2 April 2018, hasil pemeringkatan atas Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 adalah idBBB.

Pada tanggal 31 Desember 2021, peringkat Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 menurut Pefindo adalah idA-.

Pada tanggal 31 Desember 2023 dan 2022, peringkat Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I 2017 menurut Pefindo adalah idBBB.

Obligasi dan obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2023 dan 2022.

21. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds I Phase I Year 2017 and Subordinated Bonds I Phase I Year 2017 (continued)

Based on the report issued by Pefindo as stated in its Letter No. 369/PEF-Dir/IV/2018 dated April 2, 2018, the rating of Bank Victoria Continuing Bonds I Phase I Year 2017 is idA- and Letter No. 370/PEF-Dir/IV/2018 dated April 2, 2018, the rating of Bank Victoria Subordinated Bonds I Phase I Year 2017 is idBBB.

As of December 31, 2021, the rating of the Bank Victoria Continuing Bonds I Phase I Year 2017 based on Pefindo was idA-.

As of December 31, 2023 and 2022, the rating of the Bank Victoria Subordinated Bonds I Phase I Year 2017 based on Pefindo was idBBB.

The above bonds and subordinated bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2023 and 2022.

22. PERPAJAKAN

22. TAXATION

a. Utang pajak

a. Taxes payable

	31 Desember/*December 31*,		
	2023	2022	
Entitas Induk			***Parent Company***
Pajak penghasilan badan			*Corporate income tax*
Pasal 25	-	-	*Article 25*
Pasal 29	-	16.049.378	*Article 29*
	-	16.049.378	
Pajak lainnya			*Other taxes*
Pasal 4 ayat 2	20.806.149	13.598.722	*Article 4 (2)*
Pajak Pertambahan Nilai	5.842.973	104.721	*Value Added Tax*
Pasal 21	2.591.590	971.083	*Article 21*
Pasal 23	18.381	75.642	*Article 23*
Pasal 26	51.349	41.927	*Article 26*
	29.310.442	14.792.095	
Jumlah utang pajak - Entitas Induk	29.310.442	30.841.473	*Total taxes payable - Parent Company*

22. PERPAJAKAN (lanjutan) / *22. TAXATION (continued)*

a. Utang pajak (lanjutan) / *a. Taxes payable (continued)*

	31 Desember/*December 31*,		
	2023	**2022**	
Entitas Anak			***Subsidiary***
Pajak lainnya			*Other taxes*
Pasal 4 ayat 2	-	-	*Article 4 (2)*
Pasal 21	-	-	*Article 21*
Pasal 23	-	-	*Article 23*
	-	-	
Jumlah utang pajak - Entitas Anak	-	-	*Total taxes payable - Subsidiary*
Konsolidasian			***Consolidated***
Pajak penghasilan badan			*Corporate income tax*
Pasal 25	-	-	*Article 25*
Pasal 29	-	16.049.378	*Article 29*
	-	16.049.378	
Pajak lainnya			*Other taxes*
Pasal 4 ayat 2	20.806.149	13.598.722	*Article 4 (2)*
Pajak Pertambahan Nilai	5.842.973	104.721	*Value Added Tax*
Pasal 21	2.591.590	971.083	*Article 21*
Pasal 23	18.381	75.642	*Article 23*
Pasal 26	51.349	41.927	*Article 26*
	29.310.442	14.792.095	
Jumlah utang pajak - Konsolidasian	**29.310.442**	**30.841.473**	***Total taxes payables - Consolidated***

b. Beban Pajak Penghasilan / *b. Deferred Tax Expense*

Beban pajak penghasilan terdiri dari: / *Deferred tax expense consist of:*

	31 Desember/*December 31*,		
	2023	**2022**	
Entitas Induk			***Parent Company***
Pajak kini	-	16.049.378	*Current tax*
Pajak tangguhan	27.719.887	113.573.037	*Deferred tax*
Jumlah Entitas Induk	27.719.887	129.622.415	*Total Parent Company*
Entitas Anak			***Subsidiary***
Pajak kini	-	289.074	*Current tax*
Pajak tangguhan	-	845.885	*Deferred tax*
Jumlah Entitas Anak	-	1.134.959	*Total Subsidiary*
Konsolidasi			***Consolidation***
Pajak kini	-	16.338.452	*Current tax*
Pajak tangguhan	27.719.887	114.418.922	*Deferred tax*
Jumlah	**27.719.887**	**130.757.374**	***Total***

22. PERPAJAKAN (lanjutan) / *22. TAXATION (continued)*

b. Beban Pajak Penghasilan (lanjutan) / *b. Deferred Tax Expense (continued)*

Rekonsiliasi antara laba sebelum beban pajak penghasilan menurut laporan laba dengan (rugi) laba kena pajak yang dihitung oleh Bank adalah sebagai berikut:

The reconciliation between profit before income tax as shown in the statement of (loss) profit with taxable loss of the Bank is as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Laba sebelum beban pajak penghasilan menurut laporan laba rugi konsolidasian	129.536.228	356.930.827	*Profit before income tax expense per consolidated statement of profit or loss*
Bagian laba bersih Entitas Anak	-	3.606.389	*Equity in net income of Subsidiary*
Eliminasi dan penyesuaian	-	(4.741.348)	*Elimination and adjustments*
Laba sebelum pajak penghasilan - Entitas Induk (Bank)	129.536.228	355.795.868	*Profit before income tax - Parent Company (Bank)*
Beda waktu:			*Timing differences:*
Imbalan pasca kerja	3.035.528	(1.162.859)	*Post-employment benefits*
Cadangan bonus, jasa profesional dan promosi	(28.443.185)	7.943.507	*Accrue bonuses, professional fees and promotion expenses*
Beban penyisihan kerugian penurunan nilai aset keuangan dan non-keuangan	(64.356.877)	(72.817.804)	*Provision for impairment losses on financial and non-financial assets*
Kerugian yang belum direalisasi dari penyertaan saham yang diukur pada nilai wajar melalui laba rugi	(137.029.607)	2.980.457	*Unrealised loss - on investment shares measured at fair value through profit or loss*
Jumlah beda waktu	(226.794.141)	(63.056.699)	*Total timing differences*
Beda tetap:			*Permanent differences:*
Biaya pemasaran	5.875.975	1.925.057	*Marketing expenses*
Biaya pajak	5.208.828	-	*Tax expenses*
Tunjangan karyawan	2.332.300	2.418.187	*Employee's allowances*
Sumbangan	77.050	42.237	*Donation*
Pendapatan dari reksadana yang dikenakan pajak final	(10.976.160)	(7.831.141)	*Income from mutual funds subject to final tax*
Pendapatan operasional lainnya	(6.950.040)	(14.437.989)	*Other operating income*
Jumlah beda tetap	(4.432.047)	(17.883.649)	*Total permanent differences*
Taksiran (rugi)/laba fiskal	(101.689.960)	274.855.520	*Estimated tax (loss)/profit*
Kompensasi rugi fiskal tahun-tahun sebelumnya:			*Tax losses carried forward from prior year:*
Rugi fiskal tahun sebelumnya yang masih dapat dikompensasi	-	(201.903.800)	*Tax losses from prior years that can be compensated*
Akumulasi rugi fiskal yang dapat dikompensasi	-	(201.903.800)	*Accumulated tax losses carried forward*
(Rugi fiskal)/penghasilan kena pajak	(101.689.960)	72.951.720	*(Fiscal Loss)/taxable income*
Beban pajak penghasilan kini:			*Current tax expense*
Bank	-	16.049.378	*Bank*
Entitas anak	-	289.074	*Subsidiary*
Beban pajak kini	-	16.338.452	*Current tax expense*
Utang pajak kini:			*Income tax payables:*
Bank	-	16.049.378	*Bank*
Entitas anak	-	-	*Subsidiary*
Utang pajak kini	-	16.049.378	*Income tax payables*

22. PERPAJAKAN (lanjutan) / *22. TAXATION (continued)*

b. Beban Pajak Penghasilan (lanjutan) / *b. Deferred Tax Expense (continued)*

Rincian rugi fiskal adalah sebagai berikut: / *The details of fiscal losses are as follows:*

	31 Desember/*December 31*,		
	2023	**2022**	
Tahun 2023	(101.689.960)	-	*Year 2023*
Tahun 2021	-	(12.984.010)	*Year 2021*
Tahun 2020	-	(188.919.790)	*Year 2020*
Total akumulasi rugi fiskal yang dapat dikompensasi	(101.689.960)	(201.903.800)	*Total accumulated tax losses carried forward*
Rugi fiskal yang dikompensasi	-	201.903.800	*Compensated tax losses*
Sisa akumulasi rugi fiskal	**(101.689.960)**	**-**	***Remaining accumulated tax losses***

Penghasilan kena pajak hasil rekonsiliasi merupakan dasar dalam pengisian Surat Pemberitahuan Tahunan (SPT) PPh Badan Perseroan.

Taxable income results from reconciliation are the basis in preparing the Company's Annual Tax Return (SPT) of Corporate Income Tax.

Rekonsiliasi antara rugi sebelum beban pajak pada laporan laba rugi dan penghasilan komprehensif lain dan perhitungan pajak penghasilan dan Manfaat Pajak untuk Bank Victoria dan entitas anak adalah sebagai berikut:

The reconciliation between loss before tax as shown in the statements of comprehensive income and income tax calculation and the related estimate of the current tax benefit for Bank Victoria and its Subsidiaries are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Laba konsolidasian sebelum pajak penghasilan	129.536.228	356.930.827	*Consolidated profit before income tax*
Pajak dihitung dengan tarif pajak yang berlaku	28.497.970	78.524.782	*Tax calculated at applicable tax rates*
Dampak pajak penghasilan pada:			*Tax effects of:*
- Beban yang tidak dapat dikurangkan untuk tujuan pajak	(975.050)	(3.934.403)	*Expenses not deductible - for tax purposes*
- Entitas Anak	-	1.134.958	*Subsidiary -*
Dampak rugi fiskal	-	-	*Tax losses*
Penyesuaian atas aset pajak tangguhan	196.967	55.032.037	*Adjustment for for deffered tax*
Beban pajak penghasilan - bersih	**27.719.887**	**130.757.374**	***Deferred tax expenses - net***

Perhitungan pajak penghasilan untuk tahun yang berakhir pada tanggal 31 Desember 2023 didasarkan pada perhitungan sementara untuk tujuan akuntansi, karena Bank belum menyampaikan Surat Pemberitahuan Tahunan (SPT) Badan. Perhitungan pajak penghasilan badan untuk tahun yang berakhir tanggal 31 Desember 2022 adalah sesuai dengan SPT Tahunan Bank.

The income tax calculation for year ended December 31, 2023 is based on preliminary calculation for accounting purpose, as the Bank has not yet submitted its annual income tax return (SPT). The calculations of income tax for the year ended December 31, 2022 conform to the Bank's Annual Tax Return.

22. PERPAJAKAN (lanjutan) / *22. TAXATION (continued)*

b. Beban Pajak Penghasilan (lanjutan) / *b. Deferred Tax Expense (continued)*

Pada tanggal 29 Oktober 2021, berdasarkan Undang-Undang No. 7 tahun 2021 tentang harmonisasi peraturan perpajakan, antara lain mengatur bahwa tarif pajak yang dikenakan atas penghasilan kena pajak bagi wajib pajak Badan dalam negeri dan bentuk usaha tetap adalah sebesar 22% yang berlaku pada tahun pajak 2022 dan seterusnya.

On October 29, 2021, based on law No. 7 year 2021 harmonization of taxation regulation, among others regulates that income tax rate on corporate taxpayer and permanent establishment's corporate taxable income 22% which will be effective for fiscal year 2022 onwards.

Tarif pajak baru tersebut digunakan sebagai acuan untuk pengukuran aset dan liabilitas pajak kini dan tangguhan sejak berlakunya peraturan tersebut yaitu 29 Oktober 2021.

The new tax rates are used as references to measure the current and deferred tax assets and liabilities starting from the enactment date of the new regulation on October 29, 2021.

c. Pajak tangguhan / *c. Deferred tax*

	31 Desember/ *December 31,* 2023				
	1 Januari/ *January*	**(Dibebankan)/ dikreditkan ke laporan laba rugi/ *(Charged)/ Credited to profit or loss***	**(Dibebankan)/ dikreditkan ke pendapatan komprehensif lain / *(Charged)/ Credited to other comprehensive income***	**31 Desember/ *December***	
Cadangan bonus, jasa profesional dan promosi	2.669.950	319.400	(746.820)	2.242.530	*Accrued bonuses, professional fee and promotion*
Cadangan kerugian penurunan nilai	144.943.198	(20.932.380)	-	124.010.818	*Allowance for impairment* lossess
Imbalan pasca kerja	8.963.403	667.816	-	9.631.219	*Post-employment benefits*
Kerugian yang belum direalisasi atas perubahan nilai wajar penyertaan saham	30.146.514	(30.146.514)	-	-	*Unrealised losses on changes in fair value on investment in shares measures at FVTPL*
Keuntungan/kerugian yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada FVOCI	10.884.268	-	(6.136.700)	4.747.568	*Unrealised gains/ (losses) on changes in fair value of securities measured at FVOCI*
Rugi pajak yang bisa dikompensasi	-	22.371.791	-	22.371.791	*Tax loss carry forward*
Jumlah aset pajak tangguhan - bersih	**197.607.333**	**(27.719.887)**	**(6.883.520)**	**163.003.926**	***Total deferred tax assets - net***

	31 Desember/ *December 31,* 2022					
	1 Januari/ *January*	**(Dibebankan)/ dikreditkan ke laporan laba rugi/ *(Charged)/ Credited to profit or loss***	**(Dibebankan)/ dikreditkan ke pendapatan komprehensif lain / *(Charged)/ Credited to other comprehensive income***	**Dampak kehilangan pengendali entitas anak/ *Loss on control on subsiary***	***31 Desember/ December***	
Entitas Induk						*Parent Company*
Cadangan bonus, jasa profesional dan promosi	552.169	1.810.532	307.249	-	2.669.950	*Accrued bonuses, professional fee and promotion*
Cadangan kerugian penurunan nilai	216.307.793	(71.364.595)	-	-	144.943.198	*Allowance for impairment lossess*
Imbalan pasca kerja	9.219.232	(255.829)	-	-	8.963.403	*Post-employment benefits*
Kerugian yang belum direalisasi atas perubahan nilai wajar penyertaan saham	29.490.813	655.701	-	-	30.146.514	*Unrealised losses on changes in fair value on investment in shares measures at FVTPL*
Keuntungan/kerugian yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada FVOCI	(5.074.568)	-	15.958.836	-	10.884.268	*Unrealised gains/ (losses) on changes in fair value of securities measured at FVOCI*
Rugi pajak yang bisa dikompensasi	44.418.846	(44.418.846)	-		-	*Tax loss carry forward*
Aset/(liabilitas) pajak tangguhan Bank - bersih	294.914.285	(113.573.037)	16.266.085	-	197.607.333	*Deferred tax asset/ (liability) Bank - net*
Dampak kehilangan pengendalian entitas anak	7.474.317	-	-	(7.474.317)	-	*Loss on control on Subsidiary*
Jumlah aset pajak tangguhan - bersih	**302.388.602**	**(113.573.037)**	**16.266.085**	**(7.474.317)**	**197.607.333**	***Total deferred tax assets - net***

Manajemen berpendapat bahwa aset pajak tangguhan yang timbul dari perbedaan temporer kemungkinan besar dapat direalisasi pada tahun-tahun mendatang.

Management believes that total deferred tax assets arising from temporary differences are probable to be realised in the future years.

23. AKRUAL DAN LIABILITAS LAIN-LAIN / *23. ACCRUALS AND OTHER LIABILITIES*

	31 Desember/*December 31*,		
	2023	**2022**	
Bunga dan bagi hasil yang masih harus dibayar	74.152.843	58.180.650	*Interest and profit sharing payable*
Liabilitas sewa	47.309.526	33.100.288	*Lease liabilities*
Beban akrual	19.003.791	18.200.019	*Accrued expenses*
Kewajiban Transaksi ATM, *Internet Banking* dan *Mobile Banking*	14.463.254	12.300.903	*ATM Transaction, Internet Banking and Mobile Banking liabilities*
Cadangan THR dan bonus	13.104.974	20.706.772	*THR and bonus reserves*
Hutang kepada *supplier*	10.521.933	13.845.357	*Payable to third parties*
Cadangan kerugian Bank Garansi	1.178.357	241.681	*Allowance for impairment losses Bank Guarantee*
Cadangan personalia dan biaya pendidikan karyawan	1.119.075	2.047.573	*Personnel reserve and employee education expenses*
Kewajiban derivatif	74.058	1.164.980	*Derivatives receivables*
Pendapatan diterima di muka	362.721	11.581	*Unearned revenues*
Lainnya	12.167.006	1.140.776	*Others*
Jumlah	**193.457.538**	**160.940.580**	***Total***

Beban akrual lainnya meliputi biaya administrasi dan operasional.

Accrued expenses consist of administration and operational expenses.

Saldo lain-lain pada tanggal 31 Desember 2023 dan 2022 terutama terdiri dari hutang kepada pihak ketiga.

The balance of others as of December 31, 2023 and 2022 mainly consist of liabilities to third parties.

24. LIABILITAS IMBALAN KERJA KARYAWAN / *24. EMPLOYEE BENEFITS OBLIGATION*

Liabilitas imbalan kerja yang diakui di laporan posisi keuangan adalah sebagai berikut:

Employee benefit liabilities recognized in the statement of financial position are as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Liabilitas imbalan pasca kerja	39.837.511	40.196.622	*Post-employment benefits liability*

Imbalan kerja jangka panjang / *Long term employee benefit*

Informasi di bawah ini mengikhtisarkan komponen beban imbalan pasca kerja karyawan yang diakui di laporan laba rugi dan penghasilan komprehensif lain dan liabilitas imbalan pasca kerja karyawan yang diakui di laporan posisi keuangan pada tanggal 31 Desember 2023 dan 2022 berdasarkan perhitungan yang dilakukan oleh aktuaris independen Kantor Konsultan Aktuaria Tubagus Syafrial & Amran Nangasan dan PT Ricky Leonard Jasatama, menggunakan metode "*Projected Unit Credit*".

The following informations summarise the components of post-employment benefits expense recognised in the profit or loss and other comprehensive income and post-employment benefits liability recognised in the statement of financial position on December 31, 2023 and 2022, based on the independent actuarial calculation carried out by an independent actuary Kantor Konsultan Aktuaria Tubagus Syafrial & Amran Nangasan and PT Ricky Leonard Jasatama, applied the "Projected Unit Credit" method.

24. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan) / *EMPLOYEE BENEFITS OBLIGATION (continued)*

Imbalan kerja jangka panjang (lanjutan) / ***Long term employee benefit (continued)***

a. Beban/(pendapatan) imbalan pasca kerja / ***a. Post-employment benefits expenses/ (income)***

	31 Desember/*December 31*,		
	2023	**2022**	
Biaya jasa kini	5.293.469	4.891.029	*Current service cost*
Biaya jasa lalu	-	170.968	*Past service cost*
Biaya jasa lalu (penyesuaian IFRIC)	-	(1.265.016)	*Past service cost (IFRIC adjustment)*
Biaya bunga	2.894.157	2.359.788	*Interest cost*
Biaya pesangon pemutusan hubungan kerja	-	-	*Severance payment*
Jumlah	**8.187.626**	**6.156.769**	***Total***

b. Liabilitas imbalan pasca kerja / ***b. Post-employment benefits liability***

	31 Desember/*December 31*,		
	2023	**2022**	
Nilai kini kewajiban imbalan pasti	39.837.511	40.196.622	*Present value of defined benefit obligations*

Mutasi nilai kini kewajiban adalah sebagai berikut: / *The movement in the present value of obligation are as follow:*

	31 Desember/*December 31*,		
	2023	**2022**	
Pada awal tahun	**40.196.622**	**43.884.161**	***At the beginning of the year***
Biaya jasa kini	5.293.469	4.891.029	*Current service cost*
Biaya jasa lalu	-	(1.094.048)	*Past service cost*
Imbalan yang dibayar	(5.152.098)	(7.319.628)	*Benefits paid*
Beban bunga	2.894.157	2.359.788	*Interest cost*
Kerugian/(keuntungan) aktuarial	(3.394.639)	2.466.010	*Actuarial loss/(gain)*
Dampak kehilangan pengendalian entitas anak	-	(4.990.690)	*Loss of control on subsidiary*
Pada akhir tahun	**39.837.511**	**40.196.622**	***At the end of the year***

Asumsi-asumsi utama yang digunakan dalam menghitung liabilitas imbalan pasca kerja pada tanggal 31 Desember 2023 dan 2022 adalah sebagai berikut: / *The principal assumptions used to determine the post-employment benefits liability as of December 31, 2023 and 2022 are as follows:*

	31 Desember/*December 31*,		
	2023	**2022**	
Usia pensiun normal	55 tahun/*years*	55 tahun/*years*	*Normal retirement age*
Tingkat mortalita	TM IV	TM IV	*Mortality rate*
Tingkat cacat	5,00% dari tingkat mortalita/ *of mortality rate*	5,00% dari tingkat mortalita/ *of mortality rate*	*Disability rate*
Tingkat pengunduran diri	5,00% per tahun/ *per annum*	5,00% per tahun/ *per annum*	*Resignation rate*
Tingkat kenaikan gaji	7,32% per tahun/ *per annum*	7,32% per tahun/ *per annum*	*Salary increase rate*
Tingkat suku bunga	6,76% per tahun/ *per annum*	7,20% per tahun/ *per annum*	*Interest rate*

24. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan)

Imbalan kerja jangka panjang (lanjutan)

b. Liabilitas imbalan pasca kerja (lanjutan)

Bank terekspos dengan beberapa risiko melalui program imbalan pasti, dengan risiko paling signifikan pada tingkat diskonto obligasi dan kenaikan gaji.

Tabel di bawah menunjukkan sensitivitas atas kemungkinan perubahan tingkat kenaikan gaji dan tingkat diskonto terhadap kewajiban imbalan pasca kerja Bank (tidak diaudit):

24. EMPLOYEE BENEFITS OBLIGATION (continued)

Long term employee benefit (continued)

b. Post-employment benefits liability (continued)

The Bank is exposed to a number of risks through its defined benefit pension plan, with the most significant risk on bond's discount rates and salary increase.

The following table represent the sensitivity analysis of a reasonably possible change *in salary increase and discount rate of obligation to Bank's post-employment benefit liability (unaudited):*

	31 Desember/*December 31*, 2023		
	Peningkatan/ *Increase by* 100 bps	**Penurunan/ *Decrease by* 100 bps**	
Tingkat diskonto	(2.379.169)	2.666.818	*Discount rates*
Kenaikan gaji	2.627.178	(2.389.227)	*Salary increases*

	31 Desember/*December 31*, 2022		
	Peningkatan/ *Increase by* 100 bps	**Penurunan/ *Decrease by* 100 bps**	
Tingkat diskonto	(2.456.823)	2.734.195	*Discount rates*
Kenaikan gaji	2.705.134	(2.476.013)	*Salary increases*

Analisis sensitivitas di atas didasarkan pada perubahan atas asumsi tunggal dengan asumsi lainnya konstan. Pada praktiknya, kecil kemungkinan hal tersebut terjadi, dan perubahan-perubahan dalam beberapa dalam beberapa asumsi mungkin saling berhubungan. Ketika melakukan perhitungan sensitivitas dari kewajiban imbalan pasti ke asumsi aktuarial yang signifikan, metode yang sama (nilai kini dari kewajiban imbalan pasti yang dihitung menggunakan *projected unit credit* pada akhir periode pelaporan) telah diterapkan seperti saat menghitung kewajiban pensiun yang diakui pada laporan posisi keuangan.

The above sensitivity analysis are based on a change in an assumption while holding all other assumption constant. In practice, this is unlikely to occur, and the changes in some of the assumption may be correlated. When calculation the sensitivity of the defined benefit obligation to significant actuarial assumptions, the same method (present value if the defined benefit obligation calculation with the projected unit credit method at the end of the reporting period) has been applied as when calculating the pension liability recognised within the statement of financial position.

Harapan umur hidup

Sebagian besar dari kewajiban program menyediakan manfaat seumur hidup, sehingga kenaikan umur hidup akan mengakibatkan kenaikan liabilitas program.

Life expectancy

The majority of the plan's obligations are to provide benefits for the life of the member, so increases in life expectancy will result in an increase in plan's liabilities.

24. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan) / *EMPLOYEE BENEFITS OBLIGATION (continued)*

Imbalan kerja jangka panjang (lanjutan) / ***Long term employee benefit (continued)***

b. Liabilitas imbalan pasca kerja (lanjutan) / ***b. Post-employment benefits liability (continued)***

Harapan umur hidup (lanjutan) / *Life expectancy (continued)*

Sebagian besar dari kewajiban program menyediakan manfaat seumur hidup, sehingga kenaikan umur hidup akan mengakibatkan kenaikan liabilitas program.

The majority of the plan's obligations are to provide benefits for the life of the member, so increases in life expectancy will result in an increase in plan's liabilities.

Pada 31 Desember 2023 dan 2022, durasi rata-rata tertimbang dari liabilitas imbalan pasti adalah 14,5 dan 16 tahun (tidak diaudit).

In December 31, 2023 and 2022, the weighted average duration of the defined benefit obligation are 14.5 and 16 years (unaudited).

Analisis jatuh tempo yang diharapkan dari manfaat pensiun adalah sebagai berikut (tidak diaudit):

Expected maturity analysis of employee benefits are as follows (unaudited):

	31 Desember/*December 31*,		
	2023	**2022**	
Kurang dari 1 tahun	2.989.627	2.216.198	*Less than 1 year*
2 - 5 tahun	15.166.437	13.435.221	*2 - 5 years*
5 - 10 tahun	9.475.613	15.339.015	*5 - 10 years*
Lebih dari 10 tahun	12.205.834	9.206.188	*Over 10 years*
Jumlah	**39.837.511**	**40.196.622**	***Total***

25. MODAL SAHAM / *SHARE CAPITAL*

Susunan pemegang saham Bank masing-masing pada tanggal 31 Desember 2023 dan 2022 berdasarkan laporan dari Biro Administrasi Efek PT Adimitra Jasa Korpora adalah sebagai berikut:

The Bank's shareholders as of December 31, 2023 and 2022 based on the report of PT Adimitra Jasa Korpora, the Shares Registration Bureau, are as follows:

	31 Desember/*December 31,* 2023			
Pemegang Saham	**Jumlah saham ditempatkan dan disetor penuh/ *Number of shares issued and fully paid***	**Persentase kepemilikan/ *Percentage of ownership***	**Jumlah modal yang disetor/ *Total capital* (Rp)**	***Shareholders***
PT Victoria Investama Tbk	7.010.537.747	44,24	701.053.775	*PT Victoria Investama Tbk*
Suzanna Tanojo	3.066.411.303	19,35	306.641.130	*Suzanna Tanojo*
PT Nata Patindo	48.823.665	0,31	4.882.367	*PT Nata Patindo*
Masyarakat (masing-masing di bawah 5%)	5.722.463.063	36,10	572.246.306	*Public (individually less than 5%)*
Jumlah	**15.848.235.778**	**100,00**	**1.584.823.578**	***Total***

25. MODAL SAHAM (lanjutan)

Susunan pemegang saham Bank masing-masing pada tanggal 31 Desember 2023 dan 2022 berdasarkan laporan dari Biro Administrasi Efek PT Adimitra Jasa Korpora adalah sebagai berikut: (lanjutan)

25. SHARE CAPITAL (continued)

The Bank's shareholders as of December 31, 2023 and 2022 based on the report of PT Adimitra Jasa Korpora, the Shares Registration Bureau, are as follows: (continued)

	31 Desember/*December 31,* 2022			
Pemegang Saham	**Jumlah saham ditempatkan dan disetor penuh/ *Number of shares issued and fully paid***	**Persentase kepemilikan/ *Percentage of ownership***	**Jumlah modal yang disetor/ *Total capital* (Rp)**	***Shareholders***
PT Victoria Investama Tbk	6.880.162.747	43,41	688.016.275	*PT Victoria Investama Tbk*
Suzanna Tanojo	3.066.411.303	19,35	306.641.130	*Suzanna Tanojo*
Chemical Asia Corporation Pte Ltd	871.275.600	5,50	87.127.560	*Chemical Asia Corporation Pte Ltd*
PT Nata Patindo	48.823.665	0,31	4.882.366	*PT Nata Patindo*
Masyarakat (masing-masing di bawah 5%)	4.981.561.399	31,43	498.156.140	*Public (individually less than 5%)*
Jumlah	**15.848.234.714**	**100,00**	**1.584.823.471**	***Total***

Mutasi jumlah saham yang ditempatkan dan disetor penuh adalah sebagai berikut:

The movement in the number of shares issued and fully paid are as follows:

	Jumlah Saham/ *Number of Shares*	
Saldo 1 Januari 2023	**15.848.234.714**	***Balance as of January 1, 2023***
Penambahan modal saham dari pelaksanaan waran Seri VII tahun 2023	1.064	*Additional in shares capital from the execution of Series VII warrants in 2023*
Saldo 31 Desember 2023	**15.848.235.778**	***Balance as of December 31, 2023***

Berdasarkan hasil Rapat Umum Pemegang Saham Tahunan tanggal 3 Juni 2022 yang telah dituangkan dalam Akta Notaris No. 05 tanggal 3 Juni 2022, pemegang saham menyetujui rencana Penambahan Modal dengan Memberikan Hak Memesan Efek Terlebih Dahulu.

According to the results of the Annual General Meeting of Shareholders on June 3, 2022 which has been stated in Notary Deed No. 05 dated June 3, 2022, the shareholders approved the plan to execute increase Share Issuance with Pre-emptive Rights.

Pada tanggal 31 Agustus 2022, Bank melakukan penerbitan saham atas Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu sebanyak 2.553.461.919 lembar saham dengan harga pelaksanaan sebesar Rp150 (sembilan lima puluh rupiah) per saham atau seluruhnya sejumlah Rp383.019.288 (tiga ratus delapan puluh tiga miliar sembilan belas juta dua ratus delapan puluh delapan ribu rupiah) yang telah masuk dalam rekening bank pada tanggal 31 Agustus 2022.

On August 31, 2022, the Bank issued shares for Share Issuance with Pre-emptive Rights of 2,553,461,919 shares with an exercise price of Rp150 (one hundred fifty Rupiah) per share or a total of Rp383,019,288 (three hundred eighty three billion nineteen million two hundred and eighty-eight thousand Rupiah) which has been entered into a Bank's account on August 31, 2022.

Peningkatan modal disetor ini telah dituangkan dalam Akta Notaris No. 1 tanggal 2 September 2022 dan telah diterima dan dicatat di dalam Sistem Administrasi Badan Hukum Kementerian Hukum dan HAM berdasarkan surat No. AHU-AH.01.03-0287195 tanggal 3 September 2022.

This increase in paid-in capital has been stated in Notarial Deed No. 1 dated September 2, 2022 and has been reported and accepted by Ministry of Law and Human Rights of the Republic of Indonesia through its letter No. AHU-AH.01.03-0287195 dated September 3, 2022.

25. MODAL SAHAM (lanjutan)

Berdasarkan hasil Rapat Umum Pemegang Saham Luar Biasa tanggal 19 Oktober 2022 yang telah dituangkan dalam Akta Notaris No. 31 tanggal 19 Oktober 2022, pemegang saham menyetujui rencana Penambahan Modal dengan Memberikan Hak Memesan Efek Terlebih Dahulu disertai dengan penerbitan Waran Seri VII (Catatan 26).

Pada tanggal 29 Desember 2022, Bank melakukan penerbitan saham atas Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu sebanyak 2.807.640.227 lembar saham dengan harga pelaksanaan sebesar Rp150 (seratus lima puluh rupiah) per saham atau seluruhnya sejumlah Rp421.146.034 (empat ratus dua puluh satu miliar seratus empat puluh enam juta tiga puluh empat ribu rupiah) yang telah masuk dalam rekening bank pada tanggal 28 Desember 2022 disertai dengan penerbitan Waran Seri VII sebanyak 2.573.670.117 waran dengan harga pelaksanaan sebesar Rp100 (seratus Rupiah) per waran.

Peningkatan modal disetor ini telah dituangkan dalam Akta Notaris No. 7 tanggal 29 Desember 2022 dan telah diterima dan dicatat di dalam Sistem Administrasi Badan Hukum Kementerian Hukum dan HAM berdasarkan surat No. AHU-AH.01.03.0497387 tanggal 29 Desember 2022. Sehingga jumlah saham yang ditempatkan dan disetor penuh pada 31 Desember 2022 adalah 15.848.234.714 saham.

Pada tahun 2023, Bank menerbitkan 1.064 lembar saham yang berasal dari hasil pelaksanaan Waran Seri VII pada tahun 2023 sehingga jumlah saham yang ditempatkan dan disetor penuh pada 31 Desember 2023 adalah 15.848.235.778 saham.

25. SHARE CAPITAL (continued)

Based on the results of the Extraordinary General Meeting of Shareholders on October 19, 2022 which has been stated in Notary Deed No. 31 dated October 19, 2022, the shareholders approved the plan to increase capital by granting pre-emptive rights accompanied by the issuance of Series VII Warrants (Note 26).

On December 29, 2022, the Bank issued shares for Share Issuance with Pre-emptive Rights of 2,807,640,227 shares with an exercise price of Rp150 (one hundred fifty Rupiah) per share or a total of Rp421,146,034 (four hundred twenty one billion one hundred forty-six million thirty-four thousand Rupiah) which was entered into a Bank's account on December 28, 2022 in conjunction with the issuance of Series VII Warrants of 2,573,670,117 warrants with an exercise price of Rp100 (one hundred Rupiah) per warrant.

This increase in paid-in capital has been stated in Notarial Deed No. 7 dated December 29, 2022 and has been reported and accepted by Ministry of Law and Human Rights of the Republic of Indonesia through its letter No. AHU-AH.01.03.0497387 dated December 29, 2022. Therefore, the number of issued and fully paid shares on December 31, 2022 is 15,848,234,714 shares.

In 2023, the Bank issued 1,064 shares originating from the execution of Series VII Warrants in 2023, so the total shares placed and fully paid as of December 31, 2023 were 15,848,235,778 shares.

26. TAMBAHAN MODAL DISETOR DAN SETORAN MODAL DITERIMA DIMUKA

Tambahan modal disetor merupakan selisih antara jumlah yang diterima dari penerbitan saham dengan nilai nominal yang dicatat sebagai setoran modal.

Pada 4 Juni 2022, Sistem Administrasi Badan Hukum Kementerian Hukum dan HAM berdasarkan surat No. AHU-0103473.AH.01.11 Tahun 2022, telah mencatatkan peningkatan modal disetor Bank menjadi Rp4.100.000.000.000,- (empat triliun seratus miliar Rupiah) (nilai penuh) saham masing-masing dengan nilai nominal Rp100 (seratus Rupiah) (nilai penuh). Peningkatan modal disetor ini berdasarkan hasil Rapat Umum Pemegang Saham Tahunan yang telah dituangkan dalam Akta Notaris No. 7 tanggal 3 Juni 2022.

26. ADDITIONAL PAID-IN CAPITAL AND CAPITAL RECEIVED IN ADVANCE

The additional paid-in capital represent the excess of proceeds from issuance of shares with the par value recorded as paid-in capital

On June 4, 2022, Legal Entity Administration System of the Ministry of Law and Human Rights based on letter No. AHU-0103473.AH.01.11 Year 2022, the Bank's paid-up capital increased to Rp4,100,000,000,000.- (four trillion one hundred billion Rupiah) (full amount) shares each with nominal of Rp100 (one hundred Rupiah) (full amount). This increase of paid-in capital is based on the results of the Annual General Meeting of Shareholders as stated in the Notarial Deed No. 7 on June 3, 2022.

26. TAMBAHAN MODAL DISETOR DAN SETORAN MODAL DITERIMA DIMUKA (lanjutan)

Pada 22 Juni 2022, Bank menerima tambahan dana setoran modal diterima dimuka dari PT Victoria Investama Tbk, PT Bhuwanatala Indah Permai Tbk, PT Victoria Sekuritas Indonesia, PT Victoria Alife Indonesia, dan PT Emperor Finance Indonesia dengan total seluruhnya sebesar Rp254.500.000.000 (nilai penuh) dalam rangka pemenuhan modal inti minimum berdasarkan POJK No. 12/POJK.03/2020 tentang Konsolidasi Bank Umum yang pelaksanaannya dilakukan sesuai dengan ketentuan POJK No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum tanggal 29 Januari 2016.

Pada tanggal 31 Agustus 2022 Bank melakukan penerbitan 2.553.461.919 lembar saham dengan harga pelaksanaan Rp150 (nilai penuh) per lembar saham. Total penerimaan dana dari penerbitan saham tersebut adalah sebesar Rp383.019.288 dimana nilai nominal saham adalah sebesar Rp255.346.192 sehingga atas penerbitan saham tersebut Bank mencatat tambahan modal disetor sebesar Rp127.673.096.

Penerbitan saham ini mencakup konversi dana setoran modal diterima dimuka yang telah diterima dari PT Victoria Investama Tbk, PT Bhuwanatala Indah Permai Tbk, PT Victoria Sekuritas Indonesia, PT Victoria Alife Indonesia dan PT Emperor Finance menjadi saham dengan harga pelaksanaan Rp150 (nilai penuh) per saham dengan total seluruhnya Rp312.450.000 sehingga jumlah saham yang diterbitkan atas konversi setoran modal diterima dimuka adalah sebanyak 2.083.333.332 lembar. Konversi setoran modal diterima dimuka telah mendapatkan persetujuan dari Otoritas Jasa Keuangan melalui surat No. S-69/PB.33/2022 tanggal 4 Juli 2022.

Pada tanggal 14 Oktober 2022, Bank menerima tambahan dana setoran modal diterima dimuka dari Suzanna Tanojo sebesar Rp200.000.000 dalam rangka pemenuhan modal inti minimum berdasarkan pemenuhan modal inti minimum berdasarkan POJKNo. 12/POJK.03/2020 tentang Konsolidasi Bank Umum yang pelaksanaannya dilakukan sesuai dengan ketentuan POJK No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum tanggal 29 Januari 2016.

26. ADDITIONAL PAID-IN CAPITAL AND CAPITAL RECEIVED IN ADVANCE (continued)

On June 22, 2022, the Bank received fund of capital received in advance from PT Victoria Investama Tbk, PT Bhuwanatala Indah Permai Tbk, PT Victoria Sekuritas Indonesia, PT Victoria Alife Indonesia and PT Emperor Finance Indonesia amounted to Rp254,500,000,000 (full amount) to fulfill the minimum core capital requirement in accordance with POJK No 12/POJK.03/2020 regarding Commercial Bank Consolidation in accordance with POJK No.11/POJK.03/2016 regarding Liability for Fulfillment of Minimum Capital of Commercial Bank dated January 29, 2016.

On August 31, 2022 the Bank issued 2,553,461,919 shares with an exercise price of Rp150 (full amount) per share. The total proceeds received from the issuance of these shares amounted to Rp383,019,288 where the nominal value of the shares was Rp255,346,192 therefore for the issuance of these shares the Bank recorded additional paid-in capital of Rp127,673,096.

The issuance of these shares includes the conversion of capital received in advance from PT Victoria Investama Tbk, PT Bhuwanatala Indah Permai Tbk, PT Victoria Sekuritas Indonesia, PT Victoria Alife Indonesia and PT Emperor Finance into shares with an exercise price of Rp150 (full amount) per share for a total of Rp312,450,000 so that the number of shares issued upon the conversion capital received in advance are 2,083,333,332 shares. The conversion of capital received in advance has been approved by Financial Services Authority through letter No. S-69/PB.33/2022 dated July 4, 2022.

On October 14, 2022, the Bank received additional capital received in advance from Suzanna Tanojo in the amount of Rp200,000,000 in order to fulfill the minimum core capital based on meeting the minimum core capital based on POJK No. 12/POJK.03/2020 concerning Consolidation of Commercial Banks, the implementation of which is carried out in accordance with POJK provisions No. 11/POJK.03/2016 concerning Minimum Capital Adequacy Requirements for Commercial Banks dated January 29, 2016.

26. TAMBAHAN MODAL DISETOR DAN SETORAN MODAL DITERIMA DIMUKA (lanjutan)

Berdasarkan hasil Rapat Umum Pemegang Saham Tahunan tanggal 19 Oktober 2022 yang telah dituang dalam Akta Notaris No. 32 tanggal 19 Oktober 2022 pemegang saham menyetujui keputusan berikut:

1. Menyetujui Penambahan modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) sebanyak-banyaknya 4.955.425.905 saham dengan nilai nominal Rp100 per saham, yang disertai dengan penerbitan sebanyak-banyaknya 4.542.473.746 Waran Seri VII.
2. Menyetujui pemberian kuasa dan wewenang kepada Direksi Bank untuk:
   - Menetapkan jumlah saham yang ditawarkan dalam PMHMETD serta jumlah Waran Seri VII;
   - Menetapkan harga pelaksanaan PMHMETD dan harga pelaksanaan Waran Seri VII;
   - Melakukan segala tindakan yang diperlukan dalam pelaksanaan PMHMETD dan penerbitan Waran Seri VII dengan memperhatikan peraturan perundang-undangan yang berlaku; dan
   - Melakukan peningkatan modal ditempatkan dan modal disetor setelah pelaksanaan PMHMETD dan Waran Seri VII dan mengubah Pasal 4 ayat 2 dan 3 Anggaran Dasar Bank Victoria.

Pada tanggal 29 Desember 2022, Bank melakukan penerbitan 2.807.640.227 lembar saham dengan harga pelaksanaan Rp150 (nilai penuh). Total penerimaan dana dari penerbitan saham tersebut adalah sebesar Rp421.146.034 dimana nilai nominal saham adalah sebesar Rp280.764.022 sehingga atas penerbitan saham tersebut Bank mencatat tambahan modal disetor sebesar Rp140.382.012.

Penerbitan saham ini mencakup konversi atas dana setoran modal diterima dimuka yang telah diterima dari PT Victoria Investama Tbk dan Suzanna Tanojo menjadi saham dengan harga pelaksanaan Rp150 (nilai penuh) per saham dengan total seluruhnya Rp420.000.000 sehingga jumlah saham yang diterbitkan atas konversi setoran modal diterima dimuka adalah sebanyak 2.799.999.999 lembar saham. Konversi setoran modal diterima dimuka telah mendapatkan persetujuan dari Otoritas Jasa Keuangan berdasarkan surat persetujuan No. S-120/PB.33/2022 tanggal 25 November 2022.

26. ADDITIONAL PAID-IN CAPITAL AND CAPITAL RECEIVED IN ADVANCE (continued)

Based on Extraordinary General Meeting of Shareholders on October 19, 2022 which has been legalised through Notarial Deed No. 32 dated October 19, 2022, the shareholders agreed the following decisions:

1. *Approved additional capital with Pre-emptive Rights (PMHMETD) of maximum of 4,955,425,905 shares with nominal value of Rp100 per share along with issuance of for a maximum of 4,542,473,746 Warrant Series VII.*
2. *Approved to grant power and authority to the Board of Directors of Bank Victoria to:*
   - *Determine the number of shares offered in the PMHMETD and the number of Warrant Series VII;*
   - *Determine the exercise price of PMHMETD and exercise price for Warrants Series VII;*
   - *implementation of PMHMETD and issuance of Series VII Warrants with due observance of the applicable laws and regulations; and*
   - *Increase the issued and paid-up capital after the implementation of the PMHMETD and Series VII Warrants and amending Article 4 paragraphs 2 and 3 of Bank Victoria's Articles of Association.*

On December 29, 2022 the Bank issued 2,807,640,227 shares with an exercise price of Rp150 (full amount). The total receipt of funds from the issuance of these shares amounted to Rp421,146,034 where the nominal value of the shares was Rp280,764,022 so that for the issuance of these shares the Bank recorded additional paid-in capital of Rp140,382,012.

The issuance of these shares includes the conversion of capital received in advance from PT Victoria Investama Tbk and Suzanna Tanojo into shares with an exercise price of Rp150 (full amount) per share for a total of Rp420,000,000 therefore the number of shares issued on the conversion of capital received in advance is 2,799,999,999 shares. The conversion of capital received in advance has been approved by Financial Services Authority based on approval letter No. S-120/PB.33/2022 dated November 25, 2022.

27. PENGGUNAAN LABA BERSIH TAHUN 2023

Penggunaan Laba Bersih Tahun 2023

Berdasarkan Berita Acara Rapat Umum Pemegang Saham Tahunan (RUPST) tanggal 26 Mei 2023 yang dinyatakan dalam Akta Notaris Fathiah Helmi, S.H. tanggal yang sama, Bank membukukan laba bersih pada tahun 2022, dan dipergunakan untuk dana cadangan umum dan laba ditahan. Dengan demikian Bank tidak melakukan pembagian dividen untuk para pemegang saham.

27. APPROPRIATION OF INCOME 2023

Appropriation of 2023 Net Income

Based on the Minutes of the Annual General Meeting of Shareholders dated May 26, 2023, as stated in the Notarial Deed of Fathiah Helmi, S.H. on the same date, the Bank posted a net profit in 2022, and this was used for general reserve funds and retained earnings. Thus, the Bank does not distribute dividends to shareholders.

28. CADANGAN UMUM

Pada tanggal 31 Desember 2023 dan 2022, Bank telah membentuk cadangan umum dan wajib sebesar Rp202.200.000 dan Rp177.200.000. Kenaikan sebesar Rp25.000.000 merupakan penambahan cadangan umum yang disepakati melalui Rapat Umum Pemegang Saham Tahunan (RUPST) pada tanggal 26 Mei 2023. Penambahan cadangan umum tertuang dalam akta Berita Acara Rapat Umum Pemegang Saham Tahunan (RUPST) yang dinyatakan dalam Akta Notaris Fatiah Helmi S.H. pada tanggal yang sama.

Cadangan umum dan wajib ini dibentuk sehubungan dengan Undang-Undang Republik Indonesia No. 1/1995 yang telah digantikan dengan Undang-Undang No. 40/2007 efektif tanggal 16 Agustus 2007 mengenai Perseroan Terbatas, yang mengharuskan perusahaan-perusahaan untuk membuat penyisihan cadangan umum sebesar sekurang-kurangnya 20% dari jumlah modal yang ditempatkan dan disetor penuh. Undang-Undang tersebut tidak mengatur jangka waktu untuk membentuk cadangan tersebut.

28. GENERAL RESERVES

As of December 31, 2023 and 2022, the Bank had set up mandatory and general reserves amounting to Rp202,200,000 and Rp177,200,000. The increase of Rp25,000,000 is an addition to the general reserve agreed upon at the Annual General Meeting of Shareholders on May 26, 2023. The addition to the general reserve is outlined in the minutes of the Annual General Meeting of Shareholders as stated in the Notarial Deed of Fatiah Helmi S.H. on the same date.

These general and legal reserve were provided in relation with the Law of the Republic of Indonesia No. 1/1995 which has been replaced with the Law No. 40/2007 effective on August 16, 2007 regarding the Limited Liability Company which requires the companies to set up a general reserve amounting to at least 20% of the issued and paid-up share capital. There is no timeline over which this amount should be provided.

29. PENDAPATAN BUNGA DAN SYARIAH / *29. INTEREST AND SHARIA INCOME*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2023	**2022**	
Pendapatan bunga			***Interest income***
Pinjaman yang diberikan	1.477.526.055	1.328.667.150	*Loans*
Efek-efek	333.248.344	294.174.567	*Marketable securities*
Penempatan pada Bank Indonesia dan bank lain	25.616.731	12.681.009	*Placements with Bank Indonesia and other banks*
Sub jumlah	**1.836.391.130**	**1.635.522.726**	***Sub total***

29. PENDAPATAN BUNGA DAN SYARIAH (lanjutan) / *29. INTEREST AND SHARIA INCOME (continued)*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2023	**2022**	
Pendapatan syariah			***Sharia income***
Pendapatan bagi hasil	-	21.416.012	*Profit sharing*
Pendapatan margin	-	10.943.114	*Margin income*
Pendapatan *ijarah* - bersih	-	155.606	*Net income from ijarah*
Pendapatan usaha utama lainnya	-	36.980.953	*Income from other main operational*
Sub jumlah	**-**	**69.495.685**	***Sub total***
Jumlah	**1.836.391.130**	**1.705.018.411**	***Total***

Jumlah pendapatan bunga dan syariah dari pihak berelasi untuk tahun yang berakhir pada tanggal 31 Desember 2023 dan 2022 masing-masing adalah sebesar Rp26.236.406 dan Rp34.329.918 (Catatan 39).

Total interest and sharia income from related parties for the years ended December 31, 2023 and 2022 amounted to Rp26,236,406 and Rp34,329,918 respectively (Note 39).

30. BEBAN BUNGA DAN SYARIAH / *30. INTEREST AND SHARIA EXPENSES*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2023	**2022**	
Simpanan dana pihak ketiga			*Third party deposits*
Deposito	831.833.370	641.002.657	*Time deposits*
Tabungan	135.286.864	116.774.716	*Savings deposits*
Giro	97.105.785	53.650.627	*Demand deposits*
Negotiable Certificate Deposits	18.551.748	5.132.618	*Negotiable Certificate Deposits*
Simpanan dari bank lain			*Deposits from other banks*
Call money	24.553.240	16.525.592	*Call money*
Efek-efek yang diterbitkan	144.948.333	133.908.333	*Securities issued*
Amortisasi emisi obligasi	5.382.435	4.643.199	*Amortisation of bonds issuance cost*
Jumlah	**1.257.661.775**	**971.637.742**	***Total***

Jumlah beban bunga dan syariah dari pihak berelasi untuk tahun yang berakhir pada tanggal Desember 31, 2023 dan 2022 masing-masing adalah sebesar Rp33.127.025 dan Rp23.911.683 (Catatan 39).

Total interest and sharia expenses from related parties for the years ended December 31, 2023 and 2022 amounted to Rp33,127,025 and Rp23,911,683 respectively (Note 39).

31. PENDAPATAN OPERASIONAL LAINNYA - LAIN-LAIN - BERSIH / *31. OTHER OPERATING INCOME - OTHERS - NET*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2023	**2022**	
Pendapatan biaya administrasi jasa perbankan	63.414.450	35.322.529	*Receipt of administrative charges for banking services*
Penerimaan kredit yang telah dihapus buku	47.297.306	267.074.723	*Gain on written-off loan*
Keuntungan transaksi *spot*	35.422.092	20.546.247	*Gain from Spot transaction*
Keuntungan transaksi *forward*	11.313.000	3.637.200	*Gain from Forward transaction*
Pendapatan rekening tidak aktif, denda saldo minimum, dan penggantian buku	8.807.499	2.846.819	*Income from inactive accounts, minimum deposit penalty, saving account replacement*
Denda keterlambatan	8.322.473	8.350.456	*Penalty income*
Komisi atas *Internet* dan *Mobile Banking*	5.719.435	6.022.481	*Commission on Internet and Mobile Banking*
Laba transaksi *swap*	1.559.855	858.950	*Swap transaction profits*
Pendapatan dari transaksi ATM	709.523	1.028.828	*Income from ATM transaction*
Pendapatan transaksi *letter of credit*	282.474	106.950	*Income from letter of credit transactions*
(Kerugian)/keuntungan yang belum terealisasi transaksi derivatif	202.833	(1.557.424)	*Unrealized (loss)/gain from derivatives transactions*
Pendapatan transaksi BIFAST	3.364	-	*Income from BIFAST transactions*
Penerimaan atas penjualan pembiayaan	-	5.897.780	*Receipt from sales of financing*
(Beban)/pendapatan administrasi operasional lainnya	5.907.880	(1.482.453)	*Other administrative operational (expense)/income*
Jumlah	**188.962.184**	**348.653.086**	***Total***

32. BEBAN PENYISIHAN KERUGIAN PENURUNAN NILAI ASET KEUANGAN DAN NON-KEUANGAN / *32. PROVISION FOR IMPAIRMENT LOSSES ON FINANCIAL AND NON-FINANCIAL ASSETS*

Beban/(pendapatan) penyisihan kerugian penurunan nilai aset keuangan:

Provision for impairment losses expenses/(income) on financial assets are as follows:

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2023	**2022**	
Pinjaman yang diberikan	245.414.162	183.850.936	*Loans*
Pendapatan bunga dan syariah masih akan diterima	(3.814.474)	45.266.724	*Interest and sharia income receivables*
Bank Garansi	306.126	(5.102.318)	*Bank Guarantee*
Efek-efek	396.514	(3.718.845)	*Marketable securities*
Aset lain-lain	206.792	3.662.834	*Other assets*
Jumlah	**242.509.120**	**223.959.331**	***Total***

Beban penyisihan kerugian penurunan nilai aset non-keuangan:

Provision of for impairment losses of non-financial assets:

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2023	**2022**	
Agunan yang diambil alih	(54.964.162)	47.616.890	*Foreclosed assets*

33. BEBAN UMUM DAN ADMINISTRASI / *33. GENERAL AND ADMINISTRATIVE EXPENSES*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2023	**2022**	
Premi penjaminan	41.124.423	38.811.438	*Insurance premium*
Penyusutan	21.974.327	26.022.323	*Depreciation*
Pungutan OJK Tahunan	12.691.827	10.750.852	*Annual fee OJK*
Sewa gedung dan kendaraan	12.237.699	8.930.140	*Building and vehicle rental*
Biaya *Internet* dan *Mobile Banking*	10.819.246	11.814.993	*Internet and Mobile Banking expenses*
Jasa profesional	8.834.519	8.240.755	*Professional fees*
Pemeliharaan dan perbaikan	7.521.077	11.560.916	*Repairs and maintenance*
Iklan dan promosi	6.633.047	2.541.663	*Advertising and promotion*
Asuransi	6.485.461	3.607.373	*Insurance*
Pengembangan teknologi	5.968.971	5.047.177	*Technology development*
Telepon, telex dan faksimili	5.780.067	4.728.931	*Telephone, telex and faximile*
Pendidikan dan pengembangan	4.955.120	3.491.307	*Study and development*
Beban bunga atas liabilitas sewa	2.854.679	1.002.883	*Interest expense of lease liabilities*
Pemakaian listrik, gas dan air minum	2.266.453	2.356.214	*Electricity, gases and waters*
Biaya jasa pihak ketiga	2.181.896	2.083.580	*Third party fee*
Barang cetakan dan alat tulis	1.970.579	1.748.441	*Printing items and stationery*
Amortisasi aset tak berwujud	1.627.621	1.971.323	*Amortisation of intangible assets*
Transportasi	1.174.517	851.550	*Transportation*
Biaya iuran lainnya	1.005.878	950.289	*Other contribution fees*
Biaya tanggung jawab sosial perusahaan	179.611	238.216	*Corporate Social Responsibilty expenses*
Pemasaran	141.150	220.679	*Marketing*
Biaya kurir	84.565	78.629	*Courier expenses*
Surat kabar dan majalah	44.294	39.262	*Newspaper and magazines*
Benda pos dan materai	16.241	56.343	*Postage and stamp*
Kerugian operasional	-	73.460	*Operational losses*
Biaya umum lainnya	326.578	1.344.831	*Other general expenses*
Jumlah	**158.899.846**	**148.563.568**	***Total***

Biaya umum lainnya terutama terdiri dari biaya keamanan dan kebersihan, biaya fotokopi, biaya alat kebersihan, biaya makelar dan administrasi bank yang secara individual nilainya tidak signifikan.

Other general expenses mainly consist of security and cleaning expenses, cleaning equipment expenses, broker, and bank charges with insignificant individual balances.

34. BEBAN TENAGA KERJA / *34. PERSONNEL EXPENSES*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2023	**2022**	
Gaji dan tunjangan	116.870.901	115.719.729	*Salaries and allowance*
Tunjangan Hari Raya dan bonus	16.022.794	24.228.796	*Holiday entitlements and bonuses*
Biaya jasa tenaga kerja	10.130.122	11.376.916	*Outsourcing service expenses*
Imbalan pasca kerja	8.187.626	7.170.426	*Post-employment benefits*
Biaya jaminan kesehatan dan pensiun	3.174.692	3.416.290	*Health and pension insurance*
Lembur	549.835	746.072	*Overtime*
Pesangon dan biaya apresiasi lainnya	2.219.540	372.760	*Severance pay and other appreciation expense*
Jumlah	**157.155.510**	**163.030.989**	***Total***

34. BEBAN TENAGA KERJA (lanjutan) / *34. PERSONNEL EXPENSES (continued)*

Termasuk dalam beban tenaga kerja adalah kompensasi yang diberikan kepada manajemen dan karyawan kunci (Catatan 39).

Included in the personnel expenses are compensation to key management and employees (Note 39).

35. BEBAN OPERASIONAL LAINNYA - LAIN-LAIN / *35. OTHER OPERATING EXPENSES - OTHERS*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2023	**2022**	
Rugi atas modifikasi pinjaman yang diberikan	48.938.923	53.525.163	*Loss on loan modification*
Rugi transaksi valuta asing	53.724.747	35.541.580	*Loss on foreign exchange transaction*
Beban administrasi dan kliring	7.182.754	5.191.778	*Administration and clearing expenses*
Beban pajak	6.486.145	1.780.159	*Tax expenses*
Beban *membership* ATM dan iuran tahunan ATM	4.147.620	4.726.576	*ATM membership and annual fee ATM expenses*
Biaya penghapus-bukuan tagihan asuransi kredit	2.547.631	2.689.950	*Loan insurance receivables write-off expenses*
Biaya provisi dan komisi dana	1.280.393	933.194	*Provision and commission funds*
Beban parkir dan tol	1.096.489	1.287.350	*Parking and toll expenses*
Beban pemasaran	324.360	300.543	*Marketing expenses*
Beban representasi dan jamuan	246.227	131.771	*Representation and entertainment expenses*
Beban keperluan kantor	138.104	145.377	*Office supplies expenses*
Kerugian belum direalisasi atas Transaksi derivatif	74.058	1.145.144	*Unrealized loss from derivatives transactions*
Beban sumbangan	77.050	42.238	*Donation expenses*
Biaya operasional lainnya	212.049	4.661.453	*Other operational expenses*
Jumlah	**126.476.550**	**112.102.276**	***Total***

36. BEBAN (PENDAPATAN) NON-OPERASIONAL - BERSIH / *36. NON-OPERATING EXPENSES (INCOME) - NET*

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2023	**2022**	
Pendapatan non-operasional:			*Non-operating income:*
Laba revaluasi valuta asing	(17.561.150)	(20.023.007)	*Gain on foreign exchange revaluation*
Laba penjualan AYDA	(14.338.270)	(4.851.065)	*Gain on sale of foreclosed assets*
Hasil sewa	(156.735)	(85.320)	*Rent income*
Pendapatan dari Ta'widh	-	(37.100)	*Gain from Ta'widh*
Pendapatan lainnya	(2.527.327)	(846.453)	*Others*
Beban non-operasional:			*Non-operating expense:*
Rugi penjualan AYDA	64.258.318	76.921.474	*Loss on sale of foreclosed assets*
Laba/(rugi) penjualan aset tetap (Catatan 14)	3.636.801	(217.726)	*Gain/(loss) on sale of fixed assets (Note 14)*
Rugi penjualan properti terbengkalai	2.318.310	-	*Loss on sale of abandoned property*
Rugi penurunan nilai aset tetap	1.450.000	-	*Loss on impairment of fixed assets*
Beban non-operasional lainnya	7.454.960	6.274.809	*Other non-operational expenses*
Beban non-operasional - bersih	**44.534.907**	**57.135.612**	***Non-operating expense - net***

36. PENDAPATAN (BEBAN) NON-OPERASIONAL – BERSIH (lanjutan)

Pendapatan lainnya terutama terdiri dari diskon pembelian kupon belanja, dan selisih lebih *cash count*.

Beban non operasional lainnya terutama terdiri dari biaya hadiah hari raya, denda-denda, sumbangan dan sanksi yang secara individual nilainya tidak signifikan.

36. NON-OPERATING INCOME (EXPENSES) – NET (continued)

Other income mainly consist of discount on voucher purchase, and difference in cash count.

Other non-operational expenses mainly consist of holiday gift, fines, donation, and penalty with insignificant individual balances.

37. LABA PER SAHAM

Laba per saham dasar dihitung dengan membagi laba tahun berjalan yang dapat diatribusikan kepada pemilik Bank dengan jumlah rata-rata tertimbang saham biasa yang beredar pada tahun bersangkutan.

Laba per saham dilusian dihitung dengan membagi laba bersih dengan rata-rata tertimbang jumlah saham yang beredar ditambah dengan rata-rata tertimbang jumlah saham yang akan diterbitkan atas konversi efek yang berpotensi saham yang bersifat dilutif.

37. INCOME PER SHARE

Basic income per share is calculated by dividing the income for the year attributable to the Bank's shareholders with the weighted-average number of ordinary shares outstanding during the year.

Diluted income per share is calculated by dividing net income by the weighted average number of shares outstanding plus the weighted average number of shares outstanding which would be issued on the conversion of the dilutive potential shares.

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2023	**2022**	
Laba tahun berjalan yang dapat diatribusikan kepada pemilik Entitas Induk			*Income for the year attributable to equity holders of the Parent Company*
Laba tahun berjalan yang dapat diatribusikan kepada pemilik Entitas Induk untuk perhitungan laba per saham dasar dan dilusian	101.816.341	226.173.453	*Income for the year attributable to equity holders of the Parent Company to be accounted for basic and diluted earnings per share*
Jumlah rata-rata tertimbang saham biasa untuk perhitungan laba per saham dasar	15.848.235	11.795.945	*Weighted-average common stock for computation of basic earnings per share*
Jumlah waran yang beredar untuk perhitungan laba per saham	2.573.669	2.573.670	*Outstanding warrants for computation of basic earnings per share*
Jumlah rata-rata tertimbang saham biasa untuk perhitungan laba per saham dilusian	15.848.235	11.795.945	*Weighted-average common stock for computation of diluted earnings per share*
Laba per saham dasar (dalam Rupiah penuh)	6,42	19,17	*Basic income per share (in Rupiah full amount)*
Laba per saham dasar dilusian (dalam Rupiah penuh)	6,42	19,17	*Diluted income per share (in Rupiah full amount)*

38. TRANSAKSI NON-KAS / *38. NON-CASH TRANSACTIONS*

Transaksi non-kas yang penting adalah perolehan agunan yang diambil alih sebagaimana yang telah dijabarkan dalam Catatan 15.

The principal non-cash transaction is acquisition of foreclosed assets, as discussed in Note 15.

Transaksi non-kas dari rekonsiliasi liabilitas yang timbul dari aktivitas pendanaan adalah sebagai berikut:

Non-cash transaction from net debt reconciliation affected from financing activities as it follows:

	31 Desember/*December 31, 2023*				
	Saldo awal/ *Beginning Balance*	**Arus kas/ *Cash flow***	**Perubahan non-kas/ *Non-cash activity***	**Saldo akhir/ *Ending Balance***	
Efek-efek yang diterbitkan	1.051.903.552	300.000.000	(4.264.024)	1.347.639.528	*Securities Issued*
Liabilitas sewa	33.100.288	(10.757.017)	24.966.255	47.309.526	*Lease liabilities*
Jumlah	**1.085.003.840**	**289.242.983**	**20.702.231**	**1.394.949.054**	***Total***

	31 Desember/*December 31, 2022*					
	Saldo awal/ *Beginning Balance*	**Arus kas/ *Cash flow***	**Perubahan non-kas/ *Non-cash activity***	**Dampak kehilangan pengendalian entitas anak/ *Loss of control on Subsidiary***	**Saldo akhir/ *Ending Balance***	
Efek-efek yang diterbitkan	1.348.520.029	(300.000.000)	3.383.523	-	1.051.903.552	*Securities Issued*
Pinjaman dari bank lain	50.000.000	(50.000.000)	-	-	-	*Borrowings*
Liabilitas sewa	15.631.796	(10.958.755)	32.199.554	(3.772.307)	33.100.288	*Lease liabilities*
Jumlah	**1.414.151.825**	**(360.958.755)**	**35.583.077**	**(3.772.307)**	**1.085.003.840**	***Total***

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI / *39. INFORMATION OF RELATED PARTIES*

Sifat Hubungan / *Nature of Relationship*

Pihak-pihak berelasi adalah perusahaan dan perorangan yang mempunyai keterkaitan kepemilikan atau kepengurusan secara langsung maupun tidak langsung dengan Bank sebagaimana diungkapkan pada Catatan 2af.

Related parties are companies and individuals who have ownership or management relationship directly or indirectly with the Bank as stated in Note 2af.

Pihak berelasi/ *Related parties*	**Sifat dari hubungan/ *Nature of relationship***	**Sifat dari transaksi/ *Nature of transaction***
PT Victoria Investama Tbk	Pemegang saham/*Shareholder*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
PT Bank Victoria Syariah	Dimiliki oleh pemegang saham utama/*under common control*	Simpanan dari bank lain/*Deposits from other banks*
PT Victoria Sekuritas Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
PT Victoria Insurance	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah,pinjaman yang Diberikan, asuransi aset tetap dan asuransi kas/ *Deposits from customers, loans, fixed assets insurance and cash insurance*
PT Victoria Alife	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan)

39. INFORMATION OF RELATED PARTIES (continued)

Pihak berelasi/ *Related parties*	Sifat dari hubungan/ *Nature of relationship*	Sifat dari transaksi/ *Nature of transaction*
PT Victoria Manajemen Investasi	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Merak Energi Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
PT Tridaya Investindo (d/h PT BIP Tridaya Propertindo)	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, Loans*
PT Grha Swahita	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
PT Padi Unggul Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/ *Deposit from customers*
PT BIP Loka Kencana	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT BIP Sentosa	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Studio One	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Asri Kencana Gemilang	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Artoda Karya Gemilang	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Bhuwanatala Indah Permai	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Frogurt Sari Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Emperor Finance Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Grata Mulia Pratama	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Putra Asih Laksana	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Suryayudha Investindo Cipta	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT GMT Investama Mandiri Tbk	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Dwimagna Kapital	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Jaya Bhakti Mandiri	Dimiliki oleh pemegang saham utama/*Under common control*	Pinjaman yang diberikan/*Loans*

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan)

39. INFORMATION OF RELATED PARTIES (continued)

Pihak berelasi/ *Related parties*	Sifat dari hubungan/ *Nature of relationship*	Sifat dari transaksi/ *Nature of transaction*
PT Magna Investa Mandiri	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Bintang Jaya Bara Sentosa	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT BIP Boga Entertainment	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT BIP Boga Permai	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Bumi Semesta Lestari	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Cahaya Medika Health Care	Dimiliki oleh pemegang saham utama/*Under common control*	Pinjaman yang diberikan/*Loans*
PT Prolestari Mega Persada	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Regis Pratama Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Surya Cakra Multi Sarana	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Verena Kapital	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Sulfindo Adiusaha	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, Bank Garansi/ *Deposits from customers, Bank Guarantee*
PT Nata Patindo	Pemegang saham/*Shareholder*	Simpanan nasabah/*Deposits from customers*
Suzanna Tanojo	Pemegang saham pengendali/ *Controlling Shareholder*	Simpanan nasabah/*Deposits from customers*
Christine Tanojo	Pemegang saham/*Shareholder*	Simpanan nasabah/*Deposits from customers*
Luciana Tanoyo	Hubungan keluarga dengan Suzanna Tanojo/*Relative of Suzanna Tanojo*	Simpanan nasabah/*Deposits from customers*
Dewan Komisaris, Direksi dan pejabat eksekutif Bank/*Board of Commissioners, Directors and executive officers of the Bank*	Manajemen dan karyawan kunci/ *Key management and employees*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
Dewan Komisaris, Direksi dan pejabat Eksekutif Entitas Asosiasi/*Board of Commissioners, Directors and executive officers of Associated Entity*	Manajemen dan karyawan kunci/ *Key management and employees*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan) / *39. INFORMATION OF RELATED PARTIES (continued)*

Transaksi dengan pihak-pihak berelasi / ***Transactions with related parties***

Transaksi-transaksi dengan pihak-pihak berelasi adalah sebagai berikut: / *Transactions with related parties are as follows:*

	31 Desember/*December 31*,		
	2023	**2022**	
Aset			***Assets***
Pinjaman yang diberikan - bruto (Catatan 11)			*Loans - gross (Note 11)*
PT Sulfindo Adiusaha	91.067.628	-	*PT Sulfindo Adiusaha*
PT Victoria Investama Tbk	24.301.030	24.997.847	*PT Victoria Investama Tbk*
PT Grha Swahita	20.031.085	16.428.215	*PT Grha Swahita*
PT Victoria Insurance Indonesia	286.816	847.601	*PT Victoria Insurance Indonesia*
PT Cahaya Medika Health Care	21.130	11.549	*PT Cahaya Medika Health Care*
PT Jaya Bhakti Mandiri	12.568	6.228	*PT Jaya Bhakti Mandiri*
PT Tri Daya Investindo (d/h PT BIP Tridaya Propertindo)	-	-	*PT Tri Daya Investindo (formerly PT BIP Tridaya Propertindo)*
PT Victoria Sekuritas Indonesia	-	14.959.723	*PT Victoria Securities Indonesia*
Dewan Komisaris, Direksi dan pejabat eksekutif Entitas Asosiasi	3.167.507	14.623.256	*Boards of Commissioners, Directors and executive officers of Associated Entity*
Dewan Komisaris, Direksi dan pejabat eksekutif Bank	5.008.677	1.391.264	*Boards of Commissioners, Directors and executive officers of the Bank*
Jumlah pinjaman yang diberikan - bruto	143.896.441	73.265.683	*Total loans - gross*
Persentase terhadap jumlah aset	**0,49%**	**0,29%**	***Percentage from total assets***
Liabilitas			***Liabilities***
Simpanan nasabah (Catatan 18)			*Deposits from customers (Note 18)*
Giro	652.841.415	246.769.560	*Demand deposits*
Tabungan	27.996.913	54.402.780	*Savings deposits*
Deposito berjangka	618.884.872	84.438.138	*Time deposits*
Negotiable Certificate Deposits	98.246.827	1.716.831	*Negotiable Certificate Deposits*
Jumlah	1.397.970.027	387.327.309	*Total*
Simpanan dari Bank Lain (Catatan 19)			*Deposits from other banks (Note 19)*
Giro	478.732	167.870	*Demand deposits*
Persentase terhadap jumlah liabilitas	**5,42%**	**1,74%**	***Percentage from total liabilities***
Pendapatan bunga dan syariah (Catatan 29)	26.236.406	34.329.918	*Interest and sharia income (Note 29)*
Persentase terhadap jumlah pendapatan bunga dan syariah	**1,42%**	**2,01%**	***Percentage from total interest and sharia income***
Beban bunga dan syariah (Catatan 30)	33.127.025	23.911.683	*Interest and sharia expenses (Note 30)*
Persentase terhadap jumlah beban bunga dan syariah	**2,63%**	**2,46%**	***Percentage from total interest and sharia expenses***

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan) / *39. INFORMATION OF RELATED PARTIES (continued)*

Transaksi dengan pihak-pihak berelasi (lanjutan) / ***Transactions with related parties (continued)***

Transaksi-transaksi dengan pihak-pihak berelasi adalah sebagai berikut: (lanjutan) / *Transactions with related parties are as follows: (continued)*

	31 Desember/*December 31*, 2023	31 Desember/*December 31*, 2022	
Beban tenaga kerja (Catatan 34)			***Personnel expenses (Note 34)***
Gaji dan tunjangan Dewan Komisaris, Direksi dan pejabat eksekutif	45.322.700	33.350.663	*Salaries and allowances of the Boards of Commissioners, Directors and executive officers*
Persentase terhadap jumlah beban tenaga kerja	**28,84%**	**20,46%**	***Percentage from total personnel expenses***
Liabilitas komitmen dan kontinjensi (Catatan 40)			***Liabilities commitments and contingencies (Note 40)***
Fasilitas pinjaman yang belum digunakan	(17.037.130)	(17.296.162)	*Unused loans facilities*
Garansi yang diterbitkan - pihak berelasi	(271.300)	(2.497.607)	*Guarantees issued - related parties*
Jumlah	**(17.308.430)**	**(19.793.769)**	***Total***
Persentase terhadap jumlah liabilitas komitmen dan kontinjensi - bersih	**0,28%**	**0,49%**	***Percentage from total commitments and contingencies liabilities - net***

Tabel berikut merupakan kisaran tingkat suku bunga kontraktual per tahun atas transaksi dengan pihak-pihak berelasi untuk tahun yang berakhir pada tanggal 31 Desember 2023 dan 2022: / *The following table summarises the range of contractual interest rates per annum for transactions with related parties for the years ended December 31, 2023 and 2022:*

	Tingkat suku bunga per 31 Desember/ *Interest rate as of December 31*, 2023	Tingkat suku bunga per 31 Desember/ *Interest rate as of December 31*, 2022	
Aset			***Assets***
Pinjaman yang diberikan - bersih (Catatan 11)	5,00% - 13,00%	5,00% - 12,00%	*Loans - net (Note 11)*
Liabilitas			***Liabilities***
Simpanan nasabah (Catatan 18)			*Deposits from customers (Note 18)*
Giro	0,00% - 5,75%	0,00% - 3,75%	*Demand deposits*
Tabungan	0,00% - 5,00%	0,00% - 5,00%	*Savings deposits*
Deposito berjangka	2,25% - 7,00%	1,50% - 6,00%	*Time deposits*
Negotiable Certificated Deposits	6,50% - 7,00%	6,50%	*Negotiable Certificate of Deposits*
Simpanan dari bank lain (Catatan 19)			*Deposits from other bank (Note 19)*
Giro	0,50% 1,50%	0,50% - 1,50%	*Demand depositss*

39. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan)

39. INFORMATION OF RELATED PARTIES (continued)

Transaksi dengan pihak-pihak berelasi (lanjutan)

Transactions with related parties (continued)

Bank memberikan kompensasi kepada Dewan Komisaris, Direksi dan pejabat eksekutif untuk tahun yang berakhir pada tanggal 31 Desember 2023 dan 2022 sebagai berikut:

The Bank provided compensation to Board of Commissioners, Directors and executive officers for the years ended December 31, 2023 and 2022 as follows:

	31 Desember/*December 31*,		
	2023	**2022**	
Dewan Komisaris:			*Board of Commissioners:*
Imbalan kerja jangka pendek*	4.955.125	2.916.015	*Short-term employee benefits**
Direksi:			*Directors:*
Imbalan kerja jangka pendek*	16.956.764	10.660.313	*Short-term employee benefits**
Pejabat eksekutif:			*Executive officers:*
Imbalan kerja jangka pendek*	23.410.812	19.774.335	*Short-term employee benefits**
Jumlah	**45.322.701**	**33.350.663**	***Total***

*Terdiri dari gaji, tunjangan, THR, dan bonus

*Consist of salaries, allowances, THR and bonuses**

Tidak ada kompensasi dalam bentuk imbalan pasca kerja, imbalan kerja jangka panjang lainnya, pesangon pemutusan kontrak kerja dan pembayaran berbasis saham kepada Dewan Komisaris dan Direksi.

There are no compensation of post-employment benefits, other long-term benefits, termination benefits and share-based payment to the Boards of Commisioners and Directors.

40. KOMITMEN DAN KONTINJENSI

40. COMMITMENTS AND CONTINGENCIES

Ikhtisar komitmen dan kontinjensi Bank yang dinyatakan dalam nilai kontrak adalah sebagai berikut:

The following is the summary of the Bank's commitments and contingencies at contractual amounts:

	31 Desember/*December 31*,		
	2023	**2022**	
Komitmen			***Commitments***
Liabilitas komitmen:			*Commitment liabilities:*
Fasilitas pinjaman yang belum digunakan:			*Unused loan facilities:*
Pihak ketiga	(5.280.610.008)	(4.016.397.640)	*Third parties*
Pihak berelasi	(17.037.130)	(17.296.162)	*Related parties*
Liabilitas komitmen - bersih	(5.297.647.138)	(4.033.693.802)	*Commitment liabilities - net*
Kontinjensi			***Contingencies***
Tagihan kontinjensi:			*Contingent receivables:*
Pendapatan bunga atas pinjaman bermasalah - pihak ketiga	311.523.645	364.247.996	*Interest receivables on non-performing loans - third parties*
Liabilitas kontinjensi:			*Contingent liabilities:*
Garansi yang diterbitkan - pihak berelasi	(271.300)	(2.497.607)	*Guarantees issued - related parties*
Garansi yang diterbitkan - pihak ketiga	(982.531.650)	(345.129.999)	*Guarantees issued - third parties*
Letter of Credit	(60.563.964)	(18.705.728)	*Letter of Credit*
Kontinjensi - bersih	(731.843.269)	(2.085.338)	*Contingent - net*
Jumlah liabilitas komitmen dan kontinjensi - bersih	**(6.029.490.407)**	**(4.035.779.140)**	***Total commitment and contingencies liabilities - net***

40. KOMITMEN DAN KONTINJENSI (lanjutan)

Pada tanggal 31 Desember 2023 dan 2022, tidak terdapat komitmen dan kontinjensi signifikan lainnya selain komitmen dan kontinjensi yang telah diungkapkan di atas.

40. COMMITMENTS AND CONTINGENCIES (continued)

As of December 31, 2023 and 2022, there are no significant commitments and contingencies other than the aforementioned commitments and contingencies.

41. PERJANJIAN PENTING

Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Sigma Cipta Caraka

Pada tanggal 26 Agustus 2014, Bank dan PT Sigma Cipta Caraka telah menandatangani Perjanjian Aplikasi Terintegrasi Transaksi Manajemen, dimana PT Sigma Cipta Caraka setuju untuk memberikan layanan jasa untuk membuat sistem untuk operasi bisnis Bank.

Berdasarkan perjanjian ini, PT Sigma Cipta Caraka memiliki hak dan kewajiban sebagai berikut:

1. PT Sigma Cipta Caraka berhak mendapatkan pembayaran dari Bank;
2. PT Sigma Cipta Caraka wajib memberikan lisensi aplikasi kepada Bank;
3. PT Sigma Cipta Caraka wajib membuat aplikasi sesuai dengan keinginan Bank;
4. PT Sigma Cipta Caraka wajib membuat laporan kemajuan proses implementasi; dan
5. PT Sigma Cipta Caraka wajib memastikan program telah benar untuk mencegah kesalahan.

Berdasarkan Addendum VI No.461/SCC/BVIC/B/19 tanggal 24 Juli 2019, jangka waktu perjanjian diubah menjadi tanpa jangka waktu hingga salah satu pihak melakukan pengakhiran perjanjian.

Biaya jasa yang telah dibayarkan sampai dengan 31 Desember 2023 dan 2022 adalah sebesar:

41. SIGNIFICANT AGREEMENT

Implementation of Application Integrated Transaction Management - PT Sigma Cipta Caraka

On August 26, 2014, Bank and PT Sigma Cipta Caraka have signed Application Integrated Transaction Management, in which PT Sigma Cipta Caraka agrees to distribute Integrated Transaction Management Application for Bank's business operation.

Based on this agreement, PT Sigma Cipta Caraka have right and obligation as follows:

1. *PT Sigma Cipta Caraka is entitled to receive payment from the Bank;*
2. *PT Sigma Cipta Caraka is obligated to give the license of the application to the Bank;*
3. *PT Sigma Cipta Caraka is obligated to customize the application according to Bank's request;*
4. *PT Sigma Cipta Caraka is obligated to make official report for implementation process progress; and*
5. *PT Sigma Cipta Caraka is obligated to ensure the programs to prevent errors.*

According to Addendum VI No.461/SCC/BVIC/B/19 dated July 24, 2019, the term of the agreement was changed to no time period until one of the party terminates the agreement.

Service fees paid as of December 31, 2023 and 2022 are amounted:

	31 Desember/*December 31*,		
	2023	**2022**	
Rupiah	1.623.875	4.219.893	*Rupiah*

Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Panen Berkah Solusi

Pada tanggal 21 Juni 2022, Bank dan PT Panen Berkah Solusi telah menandatangani Perjanjian Pemeliharaan Server AS400, dimana PT Panen Berkah Solusi setuju untuk memberikan layanan jasa pemeliharaan server AS400 untuk operasi Bank.

Implementation of Application Integrated Transaction Management - PT Panen Berkah Solusi

On June 21, 2022, the Bank and PT Panen Berkah Solusi has signed an AS400 Server Maintenance Agreement, whereby PT Panen Berkah Solusi agreed to provide AS400 server maintenance services for the Bank's operations.

41. PERJANJIAN PENTING (lanjutan)

Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Panen Berkah Solusi (lanjutan)
Berdasarkan perjanjian ini, PT Panen Berkah Solusi memiliki hak dan kewajiban sebagai berikut:

1. PT Panen Berkah Solusi berhak mendapatkan pembayaran dari Bank;
2. PT Panen Berkah Solusi, wajib menyediakan jasa tenaga kerja sesuai kemampuan teknis;
3. PT Panen Berkah Solusi, wajib memberikan informasi tertulis kepada Bank yang diperlukan dalam penyelesaian tugas;
4. PT Panen Berkah Solusi, wajib mengirimkan suku cadang kepada Bank;
5. PT Panen Berkah Solusi, wajib melakukan kunjungan setiap dua bulan untuk melakukan pengecekan pada semua perangkat.
6. PT Panen Berkah Solusi, berhak melakukan penagihan atas jasa penyediaan suku cadang;
7. PT Panen Berkah Solusi, wajib menyediakan semua kebutuhan suku cadang yang diperlukan dalam rangka perbaikan mesin;
8. PT Panen Berkah Solusi bersedia di audit oleh auditor internal Bank atau Otoritas Jasa Keuangan atau pihak eksternal yang ditunjuk oleh Bank; dan
9. PT Panen Berkah Solusi, wajib melaporkan kepada Bank setiap kejadian kritis yang dapat mengakibatkan kerugian/menganggu kelancaran operasional Bank.

Surat perjanjian tertanggal 21 Juni 2022 pada terhadap perjanjian kerja sama antara Bank dan PT Panen Berkah Solusi pada No.016/SPK/PBS/VI/2022 bahwa jangka waktu perjanjian adalah sejak tanggal 21 Juni 2022 sampai dengan 20 Juni 2023, sebagaimana telah diubah pada Adendum perjanjian No.027/SPK/PBS/VII/2023 tanggal 12 Juli 2023, jangka waktu perjanjian adalah sejak tanggal 20 Juni 2023 sampai dengan 19 Juni 2024.

Biaya jasa yang telah dibayarkan sampai dengan 31 Desember 2023 dan 2022 yang termasuk dalam perjanjian ini adalah sebesar:

41. SIGNIFICANT AGREEMENT (continued)

Implementation of Application Integrated Transaction Management - PT Panen Berkah Solusi (continued)
Based on this agreement, PT Panen Berkah Solusi has the following rights and obligations:

1. *PT Panen Berkah Solusi is entitled to receive payment from the Bank;*
2. *PT Panen Berkah Solusi, is required to provide labor services according to technical capabilities;*
3. *PT Panen Berkah Solusi, is required to provide written information to the Bank that is needed in completing the task;*
4. *PT Panen Berkah Solusi, must send spare parts to the Bank;*
5. *PT Panen Berkah Solusi, must visit every two months to check all devices;*
6. *PT Panen Berkah Solusi, has the right to bill for spare parts supply services;*
7. *PT Panen Berkah Solusi, must provide all the spare parts needed for machine repair;*
8. *PT Panen Berkah Solusi is willing to be audited by the Bank's internal auditor or the Financial Services Authority or an external party appointed by the Bank; and*
9. *PT Panen Berkah Solusi, is required to report to the Bank every critical incident that may result in losses/disturb the smooth operation of the Bank.*

The agreement dated June 21, 2022 on the agreement between the Bank and PT Panen Berkah Solusi under No.016/SPK/PBS/VI/2022 states that the term of the agreement is from June 21, 2022 until June 20, 2023, as amended in the Agreement Addendum No.027/SPK/PBS/VII/2023 dated July 12, 2023, the term of the agreement is from June 20, 2023 until June 19, 2024.

Service fees paid as of December 31, 2023 and 2022 included in this agreement are amounted:

	31 Desember/*December 31*,	
	2023	**2022**
Rupiah	226.440	222.360

Rupiah

42. KEPENTINGAN NONPENGENDALI / *42. NON-CONTROLLING INTEREST*

Perubahan kepentingan nonpengendali atas kekayaan bersih Bank adalah sebagai berikut:

The changes in the non-controlling interest in the net assets of the Bank is as follows:

	Tahun yang berakhir Pada tanggal 31 Desember/ *Years ended December 31*,		
	2023	**2022**	
Saldo awal tahun	-	17.327	*Balance at beginning of the year*
Bagian kepentingan nonpengendali atas laba/(rugi) tahun berjalan	-	-	*Profit/(loss) for the attributable year to non-controlling interest*
Bagian kepentingan nonpengendali atas laba komprehensif lainnya	-	-	*Other comprehensive income attributable to non-controlling interest*
Bagian kepentingan nonpengendali atas keuntungan/(kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada FVOCI di dalam ekuitas Entitas Anak	-	-	*Unrealised gains/(losses) on changes in fair value of marketable securities measured at FVOCI in Subsidiary's equity to non-controlling interest*
Divestasi entitas anak (Catatan 48)	-	(17.327)	*Divestment of subsidiary (Note 48)*
Saldo akhir tahun	**-**	**-**	***Balance at the end of the year***

43. INFORMASI SEGMEN USAHA / *43. SEGMENT INFORMATION*

a. Bidang usaha / *a. Business activities*

Nama Perusahaan/*Company*	**Bidang Usaha/*Business Activities***
PT Bank Victoria International Tbk	Perbankan Konvensional/*Conventional banking*
PT Bank Victoria Syariah	Perbankan Syariah/*Banking activities based on Sharia Principles*

b. Segmen Usaha / *b. Business Segment*

Segmen Operasi / ***Operating Segment***

Berikut adalah informasi segmen Bank berdasarkan segmen operasi:

The following is the segment information of the Bank based on operating segments:

	31 Desember/*December 31*, 2023				
	Konvensional/ *Conventional*	**Syariah/ *Sharia***	**Eliminasi/ *Elimination***	**Jumlah/ *Total***	
Pendapatan bunga dan syariah - bersih	578.729.355	-	-	578.729.355	*Interest and sharia income - net*
Pendapatan operasional lainnya	253.365.261	-	-	253.365.261	*Other operating income*
Beban operasional lainnya	(626.226.499)	-	-	(626.226.499)	*Other operating expense*
Laba/(rugi) operasional	205.868.117	-	-	205.868.117	*Income/(loss) from operations*
Jumlah aset	29.624.240.421	-	-	29.624.240.421	*Total assets*
Jumlah liabilitas	25.799.455.411	-	-	25.799.455.411	*Total liabilities*

43. INFORMASI SEGMEN USAHA (lanjutan) / *43. SEGMENT INFORMATION (continued)*

b. Segmen Usaha (lanjutan) / *b. Business Segment (contiued)*

Segmen Operasi (lanjutan) / ***Operating Segment (continued)***

	31 Desember/*December 31,* 2022				
	Konvensional/ *Conventional*	**Syariah/ *Sharia***	**Eliminasi/ *Elimination***	**Jumlah/ *Total***	
Pendapatan bunga dan syariah - bersih	699.306.521	34.074.148	-	733.380.669	*Interest and sharia income - net*
Pendapatan operasional lainnya	377.771.952	6.037.660	(3.606.389)	380.203.223	*Other operating income*
Beban operasional lainnya	(663.475.220)	(36.042.233)	-	(699.517.453)	*Other operating expense*
Laba/(rugi) operasional	413.603.253	4.069.575	(3.606.389)	414.066.439	*Income/(loss) from operations*
Jumlah aset	25.932.001.125	-	-	25.932.001.125	*Total assets*
Jumlah liabilitas	22.231.537.644	-	-	22.231.537.644	*Total liabilities*

Segmen Geografis / ***Geographic Segment***

Berikut ini adalah informasi segmen Bank berdasarkan daerah geografis:

The following is the business segment information of the Bank based on geographical area:

	31 Desember/*December 31,* 2023					
	Jadetabek/ *Jadetabek*	**Jawa Barat/ *West Java***	**Jawa Tengah & Jawa Timur /*Central & East Java***	**Luar Jawa/ *Non Java***	**Jumlah/ *Total***	
Pendapatan bunga dan syariah - bersih	605.904.033	7.712.804	(5.953.084)	(28.934.398)	578.729.355	*Interest and sharia income - net*
Pendapatan operasional lainnya	244.424.786	2.810.354	3.731.919	2.398.202	253.365.261	*Other operating income*
Beban penyisihan kerugian penurunan nilai aset keuangan dan non-keuangan	(153.988.492)	(1.238.620)	(25.868.360)	(6.449.486)	(187.544.958)	*Provision for impairment losses on financial and non-financial assets*
Beban umum dan administrasi, tenaga kerja, kerugian atas perubahan nilai wajar dan lain-lain	(410.010.772)	(6.792.939)	(11.014.661)	(10.863.169)	(438.681.541)	*General and administrative expenses, personnel expenses, unrealized loss changes of fair value and others*
Laba (rugi) operasional	286.329.555	2.491.599	(39.104.186)	(43.848.851)	205.868.117	*Profit (loss) from operations*
Beban non operasional - bersih	(76.444.394)	(910)	54.764	58.651	(76.331.889)	*Non-operating expense - net*
Laba (rugi) sebelum beban pajak penghasilan	209.885.161	2.490.689	(39.049.422)	(43.790.200)	129.536.228	*Profit (loss) before income tax expense*
Beban pajak penghasilan	(27.719.887)	-	-	-	(27.719.887)	*Income tax expense*
Laba/(rugi) bersih tahun berjalan	182.165.274	2.490.689	(39.049.422)	(43.790.200)	101.816.341	*Gain/(loss) for the year*
Jumlah aset	28.781.506.754	245.131.599	398.882.726	198.719.342	29.624.240.421	*Total assets*
Jumlah liabilitas	23.861.710.649	260.086.342	756.951.352	920.707.068	25.799.455.411	*Total liabilities*

43. INFORMASI SEGMEN USAHA (lanjutan)

b. Segmen Usaha (lanjutan)

Segmen Geografis (lanjutan)

Berikut ini adalah informasi segmen Bank berdasarkan daerah geografis: (lanjutan)

43. SEGMENT INFORMATION (continued)

b. Business Segment (continued)

Geographic Segment (continued)

The following is the business segment information of the Bank based on geographical area: (continued)

	31 Desember/*December 31*, 2022					
	Jadetabek/ *Jadetabek*	**Jawa Barat/ *West Java***	**Jawa Tengah & Jawa Timur /*Central & East Java***	**Luar Jawa/ *Non Java***	**Jumlah/ *Total***	
Pendapatan bunga dan syariah - bersih	739.975.235	(410.451)	7.587.788	(13.771.903)	733.380.669	*Interest and sharia income - net*
Pendapatan operasional lainnya	372.687.153	901.405	4.884.713	1.729.952	380.203.223	*Other operating income*
Beban penyisihan kerugian penurunan nilai aset keuangan dan non-keuangan	(259.895.321)	(600.942)	(8.898.918)	(2.181.040)	(271.576.221)	*Provision for impairment losses on financial and non-financial assets*
Beban umum dan administrasi, tenaga kerja, kerugian atas perubahan nilai wajar dan lain-lain	(383.932.825)	(9.193.029)	(24.089.876)	(10.725.502)	(427.941.232)	*General and administrative expenses, personnel expenses, unrealized loss changes of fair value and others*
Laba (rugi) operasional	468.834.242	(9.303.017)	(20.516.293)	(24.948.493)	414.066.439	*Profit (loss) from operations*
Beban non operasional - bersih	(57.197.432)	-	61.820	-	(57.135.612)	*Non-operating expense - net*
Laba (rugi) sebelum beban pajak penghasilan	411.636.810	(9.303.017)	(20.454.473)	(24.948.493)	356.930.827	*Profit (loss) before income tax expense*
Beban pajak penghasilan	(130.757.374)	-	-	-	(130.757.374)	*Income tax expense*
Laba/(rugi) bersih tahun berjalan	280.879.436	(9.303.017)	(20.454.473)	(24.948.493)	226.173.453	*Gain/(loss) for the year*
Jumlah aset	25.223.756.524	133.706.836	342.256.649	232.281.116	25.932.001.125	*Total assets*
Jumlah liabilitas	20.720.713.354	244.546.970	588.098.157	678.179.163	22.231.537.644	*Total liabilities*

44. JAMINAN PEMERINTAH TERHADAP KEWAJIBAN PEMBAYARAN BANK UMUM

Berdasarkan Undang-Undang Republik Indonesia No. 24 tanggal 22 September 2004, efektif sejak tanggal 22 September 2005, Lembaga Penjamin Simpanan (LPS) dibentuk untuk menjamin kewajiban tertentu bank-bank umum berdasarkan program penjaminan yang berlaku. Undang-Undang tersebut telah diubah dengan Peraturan Pemerintah sebagai Pengganti Undang-Undang No. 3 Tahun 2008, yang mana telah ditetapkan menjadi Undang-Undang sejak tanggal 13 Januari 2009 berdasarkan Undang-Undang Republik Indonesia No. 7 Tahun 2009.

Berdasarkan Peraturan Pemerintah Republik Indonesia No. 66/2008 tanggal 13 Oktober 2008 mengenai besarnya nilai simpanan yang dijamin LPS, pada tanggal 31 Desember 2023 dan 2022, jumlah simpanan yang dijamin LPS adalah simpanan sampai dengan Rp2.000.000 untuk nasabah per bank.

44. GOVERNMENT GUARANTEE ON OBLIGATIONS OF PRIVATE BANKS

Based on Law No. 24 dated September 22, 2004, effective September 22, 2005, Indonesia Deposit Insurance Corporation (LPS) was established to provide guarantee on certain deposits from customers based on prevailing guarantee schemes. The law was changed with the Government Regulation as at the Replacement of Law No. 3 Year 2008, which was stipulated as a law since January 13, 2009 based on the Republic of Indonesia Law No. 7 Year 2009.

Based on Government of Republic of Indonesia Regulation No. 66/2008 dated October 13, 2008 regarding the deposit amount guaranteed by LPS, as of December 31, 2023 and 2022, the deposit amount guaranteed by LPS for every customer in a bank was a maximum of Rp2,000,000.

44. JAMINAN PEMERINTAH TERHADAP KEWAJIBAN PEMBAYARAN BANK UMUM (lanjutan)

Bank adalah peserta dari program penjaminan tersebut dan beban premi penjaminan Pemerintah yang dibayar selama tahun yang berakhir tanggal 31 Desember 2023 dan 2022 masing-masing adalah sebesar Rp41.124.423 dan Rp37.140.883.

44. GOVERNMENT GUARANTEE ON OBLIGATIONS OF PRIVATE BANKS (continued)

The Bank is a participant of this government guarantee program and the premium paid for the year ended December 31, 2023 and 2022 amounted to Rp41,124,423 and Rp37,140,883, respectively.

45. MANAJEMEN RISIKO

Bank telah menerapkan manajemen risiko yang independen dan sesuai dengan standar yang mengacu pada POJK No. 18/POJK.03/2016 tanggal 16 Maret 2016 tentang Penerapan Manajemen Risiko Bagi Bank Umum.

Kegiatan usaha Bank senantiasa dihadapkan pada risiko-risiko yang berkaitan erat dengan fungsinya sebagai lembaga intermediasi keuangan. Oleh karena itu, kegiatan operasional Bank dikelola dengan baik supaya tidak menimbulkan kerugian. Di dalam melaksanakan strategi bisnis Bank, maka manajemen berupaya untuk dapat menyelaraskan antara:

- Pertumbuhan bisnis dan peningkatan pangsa pasar kredit dan portofolio pendanaan.
- Peningkatkan efisiensi operasional perbankan.
- Menjaga tingkat kebutuhan modal minimum sesuai ketentuan otoritas.
- Implementasi manajemen risiko yang berorientasi bisnis.

Sebagai lembaga intermediasi keuangan, Bank menyadari bahwa semakin kompleksnya kegiatan usaha yang diikuti dengan perkembangan lingkungan internal maupun eksternal sehingga meningkatkan risiko dalam menjalankan kegiatan usahanya. Menyadari akan risiko yang dihadapi, Bank harus menerapkan kebijakan manajemen risiko yang baik dan dapat beradaptasi dengan perubahan yang terjadi dan meningkatkan praktek tata kelola yang sehat (*Good Corporate Governance*) pada keseluruhan lingkup aktivitas usaha.

Penerapan manajemen risiko yang efektif dengan mempertimbangkan segala aspek dan prinsip kehati-hatian (*prudential principles*) ini bertujuan untuk memastikan bahwa potensi yang timbul dalam kegiatan usahanya dapat diidentifikasi, diukur, dipantau, dan dimonitor akan memberikan manfaat berupa peningkatan kepercayaan *stakeholder*.

45. RISK MANAGEMENT

The Bank has implemented independent risk management and in accordance with standards that refer to POJK No. 18/POJK.03/2016 dated March 16, 2016 regarding the Implementation of Risk Management for Commercial Banks.

Bank's business activities always faced with risks that are closely related to its function as a financial intermediary. Therefore, the Bank's operations are properly managed so it could prevent any harm. In the performance of the Bank's business strategy, management seeks to harmonise between:

- *Business growth and increased market share of credit and financing portfolios.*
- *Increasing the efficiency of banking operations.*
- *Maintain the level of minimum capital requirements pursuant to the authority.*
- *Implementation of business-oriented risk management.*

As a financial intermediary institution, the Bank realises that the business activity is more complex and also depends with development of internal and external conditions that increase the Bank 's risk in conducting its business activities. Realising the risk it faces, the Bank must apply good risk management policy that can adapt with the changes and also enhance the Good Corporate Governance Practice in the whole activities of the Bank.

The effective application of risk management by considering all aspects and prudential principles which has objective to ensure that potential arises in conducting its business activities can be identified, measured, reviewed and monitored will give a benefit to increase stakeholder trust to the Bank.

45. MANAJEMEN RISIKO (lanjutan)

Dalam menunjang penerapan manajemen risiko, Bank senantiasa berupaya meningkatkan pengawasan aktif dari Dewan Komisaris dan Direksi, antara lain melalui unit kerja dan komite untuk menunjang proses pengendalian risiko. Hal ini diwujudkan dengan adanya Satuan Kerja Manajemen Risiko (SKMR) di bawah wadah Komite Manajemen Risiko yang berwenang dan bertanggung jawab dalam menyusun dan menetapkan kebijakan manajemen risiko serta perubahannya termasuk strategi manajemen risiko dan rencana kontinjensi apabila terjadi kondisi yang tidak diinginkan.

Selain hal tersebut di atas, terdapat komite lain yang bertugas untuk menangani risiko secara lebih spesifik, yaitu antara lain Komite Kredit Tingkat Direksi (KKD), *Assets and Liabilities Committee* (ALCO), Komite Teknologi Sistem Informasi, sedangkan pada level Dewan Komisaris terdapat Komite Pemantau Risiko, Komite Nominasi dan Remunerasi, Komite Audit dan Komite Tata Kelola Terintegrasi.

Semua Dewan Komisaris dan Direksi telah mengikuti Ujian Sertifikasi Manajemen Risiko yang diselenggarakan oleh Badan Sertifikasi Manajemen Risiko dan Lembaga Sertifikasi Profesi Perbankan.

Seiring dengan perkembangan globalisasi dan teknologi informasi, Lembaga Jasa Keuangan (LJK) merupakan salah satu industri yang memiliki sistem keuangan yang sangat kompleks, dinamis, dan saling terkait antar masing-masing sektor jasa keuangan baik dalam produk dan kelembagaan, maupun kepemilikan yang menyebabkan meningkatnya eksposur risiko. Menghadapi kondisi tersebut, penerapan manajemen risiko akan dilakukan secara terintegrasi dengan memperhatikan seluruh risiko, baik yang berasal dari perusahaan anak dan perusahaan terelasi (*sister company*), maupun entitas lainnya yang tergabung dalam suatu konglomerasi keuangan.

Manajemen Risiko Terintegrasi telah diterapkan secara komprehensif dan efektif sesuai POJK No. 17/POJK.03/2014 dan SEOJK No. 14/SEOJK.03/2015 tentang Penerapan Manajemen Risiko Terintegrasi Bagi Konglomerasi Keuangan. Bank telah ditunjuk sebagai Entitas Utama dalam hal Pengawasan Terintegrasi Konglomerasi Keuangan Grup Victoria.

45. RISK MANAGEMENT (continued)

In supporting the implementation of risk management, the Bank continuously improve the active monitoring from the Boards of Commissioners and Directors, including establishing several permanent working units and committee to support risks control process. This is implemented by establishing Risk Management Working Unit (SKMR) under Risk Management Committee who authorise and responsible to prepare and decide risk management policy and its changes including risk management strategy and contingency plan if an abnormal condition happens.

Besides the above matters, there are other committee to handle more specific risks, such as Credit Committee at Board of Directors level (KKD), Assets and Liabilities Committee (ALCO), Information System Technology Committee, whereas at the Board of Commissioners level, there are Risk Monitoring Committee, Nomination and Remuneration Committee, Audit Committee and Integrated Corporate Governance Commitee.

All of the Boards of Commissioners and Directors passed the examination of Risk Management Certification that was held by the Board of Risk the Management Certification and Banking Professional Certification Institute.

As a response with the development of globalisation and information technology, Financial Services Institution (LJK) is one of industry which has a complex, dynamic and inter-related between each financial sector, both in product and organisation, and ownership which can increase the risk exposure. Facing this circumstances, the implementation of risk management will be performed integratedly by concerning all the risks, including from subsidiary and sister companies, and other financial entities included in one financial conglomeration.

Integrated Risk Management has been implemented comprehensively and effectively in accordance with POJK No. 17/POJK.03/2014 and SEOJK No. 14/SEOJK.03/2015 about Implementation of Integrated Risk Management for Financial Conglomeration. The Bank has been appointed as the main entity in the Integrated Monitoring of Financial Conglomeration is Victoria Group.

45. MANAJEMEN RISIKO (lanjutan)

Dalam menunjang penerapan manajemen risiko terintegrasi, maka Bank berupaya meningkatkan pengawasan aktif Dewan Komisaris dan Direksi, antara lain melalui Satuan Kerja Manajemen Risiko Terintegrasi (SKMRT) di bawah wadah Komite Manajemen Risiko Terintegrasi, sedangkan pada level Dewan Komisaris terdapat Komite Tata Kelola Terintegrasi.

Risiko kredit

Risiko kredit adalah risiko yang terjadi akibat kegagalan debitur dan/atau pihak lawan (*counterparty*) dalam memenuhi kewajiban mereka. Tujuan dari pengelolaan risiko kredit adalah untuk mengendalikan dan mengelola eksposur risiko kredit dalam parameter yang dapat diterima, sekaligus memaksimalkan *return on risk*.

Dalam mengelola risiko kredit, Bank telah memiliki kebijakan dan pedoman perkreditan, yang disempurnakan secara berkala, dengan tetap didasarkan pada prinsip pengelolaan risiko yang independen sesuai dengan peraturan OJK dan peraturan eksternal lainnya dan kebijakan manajemen risiko yang terkait dengan pemberian pinjaman. Pengelolaan risiko kredit mencakup aktivitas penyaluran kredit serta eksposur risiko kredit lainnya seperti penempatan, pembelian efek-efek, dan penyertaan, yang dikelola secara komprehensif baik pada tingkat portofolio maupun transaksi.

Bank melakukan evaluasi atas tingkat risiko kredit terkait pemberian fasilitas kepada nasabah atau proyek dengan mempertimbangkan berbagai faktor, antara lain sebagai berikut:

i. Historis dan proyeksi kondisi keuangan, termasuk laporan posisi keuangan, laporan laba rugi, dan laporan arus kas nasabah;

ii. Riwayat hubungan kredit;
iii. Kualitas, kinerja dan pengalaman dari pengelolaan nasabah;
iv. Sektor industri nasabah;
v. Kualitas agunan debitur, baik berupa aset berwujud maupun agunan setara kas;
vi. Posisi nasabah dalam persaingan industri sejenis; serta
vii. Kondisi ekonomi secara umum.

45. RISK MANAGEMENT (continued)

In supporting the implementation of integrated risk management, Bank encourage the active monitoring by Board of Directors and Board of Commissioners, such as through SKMRT under supervision of Integrated Risk Monitoring Committee, whereas at the Board of Commissioners level through the Integrated Corporate Governance Committee.

Credit risk

Credit risk is the risk by debtors and/or counterparty's failure to fulfill their obligations. The objective of credit risk management is to control and manage credit risk exposures within acceptable parameters, while optimising the return on risk.

In managing credit risk, the Bank has credit policies and standard operations, that are enhanced periodically in accordance with independent risk management principles based on OJK regulations and other external regulatory and risk management policies related to credit. Management of credit risk include lending activities and other credit risk exposures such as placement, purchase of securities and investments, which are managed comprehensively at both portfolio and transaction.

The Bank evaluates the credit risk level related to financing the customers or projects by considering various factors, which include the following:

i. Historical and projected financial condition, including statement of financial position, profit or loss, and statement of cash flows of the customers;
ii. Credit history;
iii. Quality, performance and experience of the customer's management;
iv. Customer's industry sector;
v. Debtor's collateral quality, both in form of tangible assets or cash equivalents;
vi. Customer's competitive position in the industry; and
vii. General economic conditions.

45. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

Terhadap eksposur risiko kredit yang lebih khusus seperti kredit perorangan, fasilitas antar bank dan sebagainya, Bank melakukan evaluasi secara tersendiri dengan menggunakan faktor yang mungkin berbeda, sesuai dengan karakteristik spesifik dari setiap jenis eksposur. Proses persetujuan fasilitas dengan eksposur risiko kredit dilakukan berdasarkan prinsip bahwa setiap fasilitas dan eksposur risiko kredit harus diproses melalui komite kredit dan/atau komite lainnya.

Selain itu, pengelolaan risiko kredit yang lebih spesifik juga dilakukan atas portofolio pinjaman yang bermasalah maupun eksposur risiko kredit lain. Upaya yang dilakukan di antaranya adalah restrukturisasi fasilitas pinjaman yang bermasalah, pengambilalihan agunan, dan pembentukan cadangan untuk menutup potensi kerugian, hingga pelaksanaan hapus buku. Bank telah menjalankan proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko yang mencakup profil risiko kredit secara komprehensif. Dalam rangka pengendalian risiko kredit secara komprehensif, Bank terus meninjau dan menyempurnakan pelaksanaan fungsi pengendalian risiko kredit.

Manajemen risiko kredit diarahkan untuk meningkatkan keseimbangan antara ekspansi kredit yang sehat dengan pengelolaan pinjaman yang berprinsip kehati-hatian (*prudent*) agar terhindar dari risiko penurunan kualitas kredit atau menjadi *Non Performing Loan* (NPL), serta mengoptimalkan penggunaan modal yang dialokasikan untuk risiko kredit.

i. Pengukuran risiko kredit

Dalam mengukur risiko kredit untuk pinjaman yang diberikan, Bank mempertimbangkan estimasi kerugian saat debitur kemungkinan tidak dapat memenuhi kewajibannya dan estimasi kerugian atas kewajiban debitur yang telah wanprestasi. Untuk mengelola dan memantau risiko atas penyaluran pinjaman, secara rutin Bank melakukan analisis terhadap portofolio pinjaman dan segmentasi bisnis berdasarkan kualitas kredit dari debitur.

ii. Pengendalian batas risiko dan kebijakan mitigasi

Untuk menghindari risiko konsentrasi kredit, Bank menetapkan limit eksposur untuk setiap nasabah baik pihak berelasi maupun pihak ketiga dalam kebijakan batas maksimum pemberian pinjaman.

45. RISK MANAGEMENT (continued)

Credit risk (continued)

In relation to the specific credit risk exposure such as individual credit, inter-bank facility and others, the Bank separately evaluates based on other factors that may be different, according to the specific characteristics of each exposure. The approval process of facility with credit risk exposure are executed based on a principal that each facility and credit risk exposure approval must be processed through the credit committee and/or other committee.

Furthermore, specific credit risk management is performed on non-performing loan portfolio and other credit risk exposures. Such efforts, among others, are restructuring on non-performing loans, foreclosing assets and providing allowances to cover potential losses, and write-off. The Bank has identified, measured, monitored, and controlled risks which covers credit risk profile in a comprehensive risk management. In order to control credit risk in a comprehensive manner, the Bank continues to review and accomplish the implementation of credit risk control function.

Credit risk management is mainly to improve the balance of credit expansion and the prudent credit management that could mitigate the risk of the deterioration of loan quality or loans from becoming Non Performing Loan, and to optimise the use of capital allocated for the credit risk.

i. Credit risk measurement

In measuring credit risk for loans, the Bank considers the estimated losses when debtor may be unable to meet its obligations and estimated losses on defaulting debtor's liabilities. To manage and monitor the credit risk, the Bank conducts a regular analysis of the loan portfolio and business segmentation based on the credit quality of debtor.

ii. Risk limit control and mitigation policies

To minimise the credit concentration risk, the Bank sets an exposure limit to each related and third parties as mentioned in the maximum lending limit policy.

45. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

ii. Pengendalian batas risiko dan kebijakan mitigasi (lanjutan)

Bank mengelola, membatasi, dan mengendalikan konsentrasi risiko kredit, secara khusus terhadap debitur individu maupun kelompok, dan industri maupun geografis.

Batas pemberian pinjaman ditelaah mengikuti perubahan pada kondisi pasar dan ekonomi dan evaluasi kredit secara periodik dan penilaian atas kemungkinan wanprestasi.

Dalam proses pengajuan pinjaman, pembelian efek-efek maupun penempatan pada bank lain, Bank menetapkan *dual control* dalam rangka *four eyes principles* yang melibatkan petugas pemasaran, petugas pemeriksa dan pejabat yang berwenang.

Beberapa pengendalian spesifik lainnya dan pengukuran mitigasi dijelaskan di bawah ini:

Agunan

Pengelolaan risiko kredit terhadap pinjaman yang diberikan tidak hanya menjaga kualitas pinjaman namun juga memitigasi risiko dengan tambahan aset sebagai jaminan atas kewajiban kontraktual debitur. Beberapa jenis agunan yang diterima dalam rangka memitigasi risiko kredit antara lain:

- Kas (Deposito)
- Tanah dan/atau bangunan
- Mesin dan peralatan
- Kendaraan bermotor
- Piutang
- Persediaan
- Garansi perorangan/Perusahaan/Bank

iii. Risiko kredit maksimum

Untuk aset keuangan yang diakui di laporan posisi keuangan, eksposur maksimum terhadap risiko kredit sama dengan nilai tercatat. Untuk bank garansi, eksposur maksimum terhadap risiko kredit adalah nilai maksimum yang harus dibayarkan oleh Bank jika liabilitas atas bank garansi terjadi. Untuk fasilitas pinjaman kepada nasabah yang belum digunakan, eksposur maksimum terhadap risiko kredit adalah sebesar komitmen tersebut.

45. RISK MANAGEMENT (continued)

Credit risk (continued)

ii. Risk limit control and mitigation policies (continued)

The Bank manages, limits, and controls the credit concentration risk, in particular, to individual counterparties and groups, and to industries and geographies.

Lending limits are reviewed in the light of changing market and economic conditions and periodic credit reviews and assessments of probability of default.

In the loan application process, purchase of securities and placement with other banks, the Bank sets dual control as part of four eyes principles which involve marketing officers, supervisors and authorised approvers.

Some other specific controls and the mitigation measurement are explained as follows:

Collateral

Risk management of loans, not only maintain loans quality but also to mitigate the risk with additional assets as collateral to cover financial contractual obligation of debtors. Some of acceptable collateral to mitigate the credit risk such as:

- *Cash (Deposits)*
- *Land and/or building*
- *Machinery and equipment*
- *Vehicle*
- *Trade receivables*
- *Inventory*
- *Personal/Corporate/Bank Guarantee*

iii. Maximum credit risk

For financial assets recognised on the statements of financial position, the maximum exposure to credit risk equals their carrying amount. For bank guarantees, the maximum exposure to credit risk is the maximum amount that the Bank has to pay if the obligations of the bank guarantees issued are called upon. For the unused loan facilities, the maximum exposure to credit risk is the committed amount.

45. MANAJEMEN RISIKO (lanjutan)

45. RISK MANAGEMENT (continued)

Risiko kredit (lanjutan)

Credit risk (continued)

iii. Risiko kredit maksimum (lanjutan)

Eksposur maksimum risiko kredit terhadap aset keuangan pada laporan posisi keuangan pada tanggal 31 Desember 2023 dan 2022 adalah sebagai berikut:

iii. Maximum credit risk (continued)

The maximum exposure to credit risk of financial assets on statements of financial position as of December 31, 2023 dan 2022 are as follows:

	Eksposur maksimum/ *Maximum exposure*		
	31 Desember 2023/ *December 31, 2023*	**31 Desember 2022/ *December 31, 2022***	
Laporan posisi keuangan			*Statement of financial position*
Giro pada Bank Indonesia	1.493.076.850	1.506.565.848	*Current accounts with Bank Indonesia*
Giro pada bank lain	296.298.919	228.384.427	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	916.367.530	858.340.530	*Placements with Bank Indonesia and other banks*
Efek-efek	6.285.563.736	4.818.553.397	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	636.732.554	839.432.375	*Securities purchased under resale agreement*
Pendapatan bunga yang masih akan diterima	386.167.151	416.231.152	*Interest receivable*
Pinjaman yang diberikan pembiayaan dan piutang syariah	18.628.743.177	15.824.611.091	*Loans, sharia financing and receivables*
Penyertaan saham	215.930.505	242.104.323	*Investment in shares*
Tagihan Akseptasi	12.474.839	7.754.446	*Acceptance receivables*
Aset lain-lain	23.076.537	29.246.923	*Other assets*
Jumlah	**28.894.431.798**	**24.771.224.512**	***Total***
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(614.260.677)	(585.869.064)	*Allowance for impairment losses*
Jumlah - bersih	**28.280.171.121**	**24.185.355.448**	***Total - net***

Eksposur maksimum risiko kredit terhadap rekening administratif pada tanggal Desember 2023 dan 2022 adalah sebagai berikut:

The maximum credit risk exposures relating to administrative accounts as of December 31, 2023 and 2022 are as follows:

	31 Desember/*December 31*,	
	2023	**2022**
Rekening administratif		*Administrative accounts*
Fasilitas pinjaman yang belum digunakan	5.297.647.138	4.033.693.802	*Unused loan facilities*
Letter of credit	60.563.964	18.705.728	*Letter of credit*
Garansi yang diterbitkan	982.802.950	347.627.606	*Guarantees issued*
Jumlah	**6.341.014.052**	**4.400.027.136**	***Total***
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(1.178.357)	(241.681)	*Allowance for impairment losses*
Jumlah - bersih	**6.339.835.695**	**4.399.785.455**	***Total - net***

45. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

iii. Risiko kredit maksimum (lanjutan)

Tabel di atas menggambarkan eksposur maksimum atas risiko kredit bagi Bank pada tanggal 31 Desember 2023 dan 2022, sebelum memperhitungkan cadangan kerugian penurunan nilai kredit dan agunan. Untuk aset keuangan, eksposur di atas ditentukan berdasarkan nilai tercatat bruto seperti yang diungkapkan pada laporan posisi keuangan.

Seperti yang telah dijelaskan di atas, pada tanggal 31 Desember 2023 dan 2022 masing-masing sebesar 64,47% dan 63,88% dari jumlah eksposur maksimum adalah berasal dari pinjaman yang diberikan (sebelum memperhitungkan cadangan kerugian penurunan nilai).

iv. Evaluasi penurunan nilai

Untuk tujuan akuntansi, Bank menggunakan model kerugian kredit ekspektasian untuk pengakuan kerugian penurunan nilai aset keuangan.

Pertimbangan utama evaluasi penurunan nilai pinjaman yang diberikan termasuk adanya pembayaran pokok atau bunga yang jatuh tempo lebih dari 30 (tiga puluh) hari dan 90 (sembilan puluh) hari atau terdapat kesulitan atau pelanggaran dari persyaratan yang terdapat dalam kontrak awal yang diketahui. Bank melakukan evaluasi penurunan nilai dalam 2 (dua) area yaitu evaluasi penurunan nilai secara individual dan evaluasi penurunan nilai secara kolektif.

a. Evaluasi penurunan nilai secara individual

Bank menentukan penyisihan kerugian penurunan nilai secara individual untuk masing-masing pinjaman signifikan yang diberikan dan memiliki bukti objektif penurunan nilai.

b. Evaluasi penurunan nilai secara kolektif

Evaluasi penyisihan kerugian penurunan nilai secara kolektif dilakukan atas pinjaman yang diberikan yang tidak signifikan secara individual dan juga untuk pinjaman signifikan yang diberikan yang tidak memiliki bukti objektif penurunan nilai.

45. RISK MANAGEMENT (continued)

Credit risk (continued)

iii. Maximum credit risk (continued)

The table above shows the maximum exposure to credit risk for the Bank as of December 31, 2023 and 2022, gross of allowance for impairment losses and collateral. For financial assets, the exposures set out above are based on the gross carrying value as disclosed in the statements of financial position.

As mentioned above, as of December 31, 2023 and 2022, amounted to 64.47% and 63.88% of the total maximum exposure, respectively, is derived from loans (gross of allowance for impairment losses).

iv. Impairment assessment

For accounting purposes, the Bank uses an expected credit loss model for the recognition of losses on impaired financial assets.

The main considerations for the loan impairment assessment include whether any payments of principal or interest are overdue by more than 30 (thirty) days and 90 (ninety) days or there are any known difficulties, or infringement of the original terms of the contract. The Bank addresses impairment assessment in 2 (two) areas: individually assessed allowances and collectively assessed allowances.

a. Individually assessed allowances

The Bank determines the allowances for impairment losses for each significant loans on an individual basis and have objective evidence of impairment.

b. Collectively assessed allowances

Allowances for impairment losses are assessed collectively for losses on loans that are not individually significant and for individually significant loans with no objective evidence of impairment.

45. MANAJEMEN RISIKO (lanjutan) / *45. RISK MANAGEMENT (continued)*

Risiko kredit (lanjutan) / *Credit risk (continued)*

v. Kualitas aset keuangan / *v. Quality of financial assets*

Pada tanggal 31 Desember 2023 dan 2022, eksposur risiko kredit atas aset keuangan terbagi atas:

As of December 31, 2023 and 2022, credit risk exposure relating to financial assets are divided as follows:

	31 Desember/ *December 31,* 2023				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Giro pada Bank Indonesia	1.493.076.850	-	-	1.493.076.850	*Current accounts with Bank Indonesia*
Giro pada bank lain	296.298.919	-	-	296.298.919	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	916.367.530	-	-	916.367.530	*Placements with Bank Indonesia and other banks*
Efek-efek	6.285.563.736	-	-	6.285.563.736	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	636.732.554	-	-	636.732.554	*Securities purchased under resale agreement*
Pinjaman yang diberikan, pembiayaan dan piutang syariah	16.834.895.372	1.050.384.426	743.463.379	18.628.743.177	*Loans, sharia financing and receivables*
Pendapatan bunga yang masih akan diterima	286.842.088	99.325.063	-	386.167.151	*Interest receivables*
Tagihan akseptasi	12.474.839	-	-	12.474.839	*Acceptance Receivable*
Penyertaan saham	215.930.505	-	-	215.930.505	*Investment in shares*
Aset lain-lain	23.076.537	-	-	23.076.537	*Other assets*
Jumlah	**27.001.258.930**	**1.149.709.489**	**743.463.379**	**28.894.431.798**	***Total***
Dikurangi:					*Less:*
Cadangan kerugian penurunan nilai				(614.260.677)	*Allowance for impairment losses*
Jumlah - bersih				**28.280.171.121**	***Total - net***

	31 Desember/ *December 31,* 2022				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Giro pada Bank Indonesia	1.506.565.848	-	-	1.506.565.848	*Current accounts with Bank Indonesia*
Giro pada bank lain	228.384.427	-	-	228.384.427	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	858.340.530	-	-	858.340.530	*Placements with Bank Indonesia and other banks*
Efek-efek	4.818.553.397	-	-	4.818.553.397	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	839.432.375	-	-	839.432.375	*Securities purchased under resale agreement*
Pinjaman yang diberikan, pembiayaan dan piutang syariah	13.749.721.837	1.406.262.727	668.626.527	15.824.611.091	*Loans, sharia financing and receivables*
Pendapatan bunga yang masih akan diterima	271.739.068	144.492.084	-	416.231.152	*Interest receivables*
Tagihan akseptasi	7.754.446	-	-	7.754.446	*Acceptance Receivable*
Penyertaan saham	242.104.323	-	-	242.104.323	*Investment in shares*
Aset lain-lain	29.246.923	-	-	29.246.923	*Other assets*
Jumlah	**22.551.843.174**	**1.550.754.811**	**668.626.527**	**24.771.224.512**	***Total***
Dikurangi:					*Less:*
Cadangan kerugian penurunan nilai				(585.869.064)	*Allowance for impairment losses*
Jumlah - bersih				**24.185.355.448**	***Total - net***

45. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan (lanjutan)

Dalam menentukan kualitas kredit berdasarkan segmen klien dipantau dan dianalisis berdasarkan hari tunggakan (*days past due*) dan kriteria kualitatif sebagaimana dijelaskan pada Catatan 2g.

Dalam hal terdapat keraguan terhadap kemampuan debitur untuk melakukan pembayaran kontraktual pada saat jatuh tempo, persyaratan kredit dapat dinegosiasikan kembali berdasarkan kesepakatan antara Bank dan debitur.

Dampak langsung dan tidak langsung atas pandemi COVID-19 mempengaruhi perekonomian global, pasar, dan pihak lawan maupun debitur dari Bank. Manajemen telah melakukan langkah-langkah untuk memitigasi dampak terhadap bisnis Bank sebagai berikut:

- Mempersiapkan skema restrukturisasi/ relaksasi kredit sementara untuk debitur yang terdampak COVID-19.
- Melakukan penyaluran pinjaman yang diberikan secara selektif dengan menerapkan prinsip kehati-hatian.
- Meningkatkan upaya penagihan dan penyelesaian kredit bermasalah.
- Melakukan efisiensi biaya operasional.
- Menerapkan manajemen risiko likuiditas secara optimum untuk menjaga posisi likuiditas Bank.

Manajemen juga melakukan analisa berdasarkan risiko atas sektor-sektor yang paling terkena dampak penurunan akibat COVID-19, dan melakukan review kualitatif atas perhitungan ECL terhadap sektor-sektor tersebut untuk meyakinkan bahwa ECL mencukupi.

Untuk debitur yang masih memiliki prospek usaha serta kemampuan membayar kewajiban, Bank dapat memberikan relaksasi kredit antara lain dalam bentuk perpanjangan tenor disesuaikan dengan siklus usaha debitur saat ini (pada umumnya untuk masa hingga 1 tahun). Sementara untuk debitur yang membutuhkan waktu pemulihan relatif lebih lama, dapat diberikan restrukturisasi kredit, antara lain dalam bentuk pemberian masa tenggang/ penundaan pembayaran dan/atau penurunan suku bunga.

45. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets (continued)

In determining credit quality by client segment are monitored and analised based on days past due and qualitative criteria as explained in Note 2g.

Where there is doubt on the ability of the debtors to meet contractual payments when due, the terms of the loans might be renegotiated based on mutual agreement between the Bank and the debtors.

Direct and indirect effects of the COVID-19 outbreak are impacting the global economy, markets, and the counterparties and debtor of the Bank. Management has taking actions to mitigate the impacts on the Bank's business as follow:

- *Establish various temporary credit restructuring/relaxation scheme for customers affected by COVID-19.*
- *Provide loans to customers selectively with prudent principles.*
- *Increase efforts on collections and settlements of non-performing loans.*
- *Manage operational expenses efficiently.*
- *Implement liquidity risk management optimally to secure the Bank's liquidity position.*

Management also performs a risk-based assessment of those sectors most impacted by the COVID-19 downturn, and performs a qualitative review of the ECL calculation associated with those sectors to ensure that overall ECL is sufficient.

For debtors who still have good business prospects and the ability to pay, the Bank can provide loan relaxation, among others through tenor extension in accordance with the debtor's current business cycle (generally for period up to 1 year). Meanwhile, for debtors who need relatively longer recovery time, its can be given loan restructuring, among others in the form of grace period/payment holiday and/or a reduction in interest rates.

45. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan (lanjutan)

Sampai dengan tanggal 31 Desember 2023 dan 2022, terdapat 235 dan 326 debitur dengan total pinjaman sebesar Rp2.868.304.020 dan Rp4.527.782.755 yang telah direstrukturisasi.

Manajemen telah berupaya untuk memperbaiki kualitas kredit Bank dan menjaga rasio NPL dibawah ketentuan maksimal yang dipersyaratkan oleh OJK dengan melakukan hal-hal sebagai berikut:

- Melakukan *cessie* pinjaman untuk debitur yang masuk ke dalam kategori pinjaman yang bermasalah;
- Mentransfer pinjaman untuk debitur yang masuk ke dalam kategori pinjaman yang bermasalah menjadi Aset Yang Diambil Alih ("AYDA") dengan mengambil alih agunan yang dijaminkan oleh debitur;
- Membuat pembentukan cadangan kerugian penurunan nilai tambahan untuk pinjaman; dan
- Melakukan restrukturisasi pinjaman sesuai dengan ketentuan dari OJK.

Mengingat model perhitungan kerugian kredit ekspektasian tidak sepenuhnya dapat menghasilkan estimasi kerugian yang akurat dalam kondisi ekonomi yang abnormal, maka Manajemen juga sudah memperhitungkan beberapa faktor penyesuaian untuk memastikan nilai kerugian kredit ekspektasian yang diakui dalam laporan keuangan dinyatakan secara wajar. Dalam menilai kondisi masa depan, manajemen telah mempertimbangkan berbagai informasi relevan yang tersedia, termasuk kebijakan COVID-19 yang dikeluarkan oleh pemerintah untuk mendukung dan mengurangi dampak penyebaran COVID-19 terhadap perekonomian, dan mendorong Bank untuk menunda atau merestrukturisasi pinjaman.

Dalam kondisi normal, penjadwalan ulang atau restrukturisasi pinjaman akan menunjukkan peningkatan risiko kredit yang signifikan dan pindah ke *Stage 2*. Namun, dalam kondisi saat ini, manajemen telah mempertimbangkan bahwa restrukturisasi atau peristiwa tidak secara otomatis memicu peningkatan risiko kredit yang signifikan jika debitur diharapkan untuk memulihkan dan memenuhi kewajiban kontraktual mereka setelah akhir periode restrukturisasi atau relaksasi.

45. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets (continued)

As of December 31, 2023 and 2022, there are 235 and 326 debtors with total outstanding loans of Rp2,868,304,020 and Rp4,527,782,755 respectively which have been restructured.

Management has made efforts to improve the quality of the Bank's credit and maintain the NPL ratio below the maximum stipulated by the OJK by doing the following:

- *Conduct a loan cessie for debtors who fall into the non-performing loan category;*
- *Transferring loans for debtors that are categorised as non-performing loans into Foreclosed Assets ("AYDA") by taking over the collateral guaranteed by the debtor;*
- *Create an additional allowance for impairment losses for loans; and*
- *Performed loan restructuring in accordance with the provisions of the OJK.*

Considering that the expected credit loss calculation model cannot produce an accurate estimation of losses in abnormal economic conditions, Management has also taken into account several adjustment factors to ensure the expected value of the expected credit loss recognised in the financial statements is stated fairly. In assessing future conditions, management has considered various relevant information available, including COVID-19 policies issued by the government to support and mitigate the impact of the spread of COVID-19 on the economy, and encouragement for banks to defer or restructure loans.

Under normal conditions, a rescheduling or restructuring of a loan would indicate a significant increase in credit risk and a move to Stage 2. However, in the current condition, management has considered that such a restructuring or event was not automatically trigger a significant increase in credit risk if the debtor would be expected to recover and fulfill their contractual obligations after the end of the restructuring or relaxation period.

45. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan (lanjutan)

Asumsi dan pertimbangan utama dalam menentukan kerugian kredit ekspektasian

Lifetime

Kerugian kredit ekspektasian diestimasikan berdasarkan periode dimana Bank terpapar pada risiko kredit. Bank memiliki proses review dari setiap model bisnis/produknya. Baik kredit *revolving* maupun *non-revolving*, untuk menghitung kerugian kredit ekspektasian menggunakan jangka waktu kontraktual sesuai dengan jangka waktu kontraknya. Penetapan periode tersebut khususnya untuk kredit revolving dilakukan dengan mempertimbangkan kondisi dimana proses perpanjangan kredit revolving yang diberikan oleh Bank dilakukan melalui kajian yang *robust* yaitu melalui evaluasi yang substantif dibandingkan administratif.

Lingkungan ekonomi yang berkembang adalah penentu utama dari kemampuan nasabah Bank untuk memenuhi kewajiban mereka saat jatuh tempo. Ini adalah prinsip dasar PSAK 71 bahwa potensi kerugian kredit di masa depan harus bergantung tidak hanya pada kesehatan ekonomi saat ini, tetapi juga harus memperhitungkan kemungkinan perubahan pada lingkungan ekonomi. Misalnya, jika Bank mengantisipasi perlambatan tajam dalam ekonomi dunia, Bank harus membentuk lebih banyak cadangan hari ini untuk menyerap kerugian kredit yang kemungkinan akan terjadi dalam waktu dekat.

Untuk menangkap efek perubahan pada lingkungan ekonomi, model PD digunakan untuk menghitung kerugian kredit ekspektasian, dengan memasukkan informasi *forward looking* dalam bentuk perkiraan nilai-nilai variabel ekonomi yang kemungkinan akan berdampak pada kemampuan pembayaran kembali nasabah Bank.

Berbagai MEV digunakan untuk setiap model PD, tergantung pada hasil analisis statistik kesesuaian MEV dengan PD serta konsensus dari pakar kredit. Diantaranya adalah indeks barang konsumtif, inflasi, dan GDP Nasional.

45. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets (continued)

Key assumptions and judgments in determining expected credit loss

Lifetime

Expected credit loss is estimated based on the period over which the Bank is exposed to credit risk. The Bank has a review process for each of its business models/products. Both revolving and non-revolving loans, to calculate expected credit losses using the contractual term in accordance with the contract period. Determination of this period, especially for revolving credit, is carried out by taking into account the conditions in which the Bank carries out the process of extending revolving credit through a robust study, namely through a substantive compared to administrative evaluation.

The developing economic environment is the key determinant of the ability of a Bank's customer to meet their obligations as they fall due. It is a fundamental principle of SFAS 71 that the potential future credit losses should depend not just on the health of the economy today, but should also take into account potential changes to the economic environment. For example, if the Bank was to anticipate a sharp slowdown in the world economy, Bank should make more provisions today to absorb the credit losses likely to occur in the near future.

To capture the effect of changes to the economic environment, PD model is used to calculate expected credit loss, by incorporating forward-looking information in the form of forecasts of the values of economic variables that are likely to have an effect on the repayment ability of the Bank's customer.

Various of MEVs are used for each PD model, depending on the statistical analysis result of appropriateness of the MEV with PD as well as consensus from credit expert. Amongst others are consumer goods index, inflation and National GDP.

45. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan (lanjutan)

Asumsi dan pertimbangan utama dalam menentukan kerugian kredit ekspektasian (lanjutan)

Sensitivitas MEV terhadap ECL

Perhitungan ECL bergantung pada beberapa variabel dan pada dasarnya tidak linier dan tergantung pada portofolio, yang menyiratkan bahwa tidak ada analisis tunggal yang dapat sepenuhnya menunjukkan sensitivitas kerugian kredit ekspektasian terhadap perubahan dalam MEV. Bank berkeyakinan bahwa sensitivitas harus dilakukan terhadap seluruh variabel, alih-alih variabel tunggal, karena hal ini sejalan dengan sifat multi-variabel dari perhitungan ECL.

Analisis sensitivitas ECL dilakukan untuk mengeksplorasi efek dari pandemi global COVID-19 yang menyebabkan perlambatan ekonomi Indonesia.

Risiko pasar

Risiko pasar adalah risiko pada laporan posisi keuangan dan rekening administratif termasuk transaksi derivatif, akibat perubahan secara keseluruhan dari kondisi pasar, termasuk risiko perubahan harga opsi. Risiko pasar meliputi, antara lain, risiko tingkat suku bunga, risiko nilai tukar, risiko ekuitas dan risiko komoditas. Risiko tingkat suku bunga, risiko nilai tukar dan risiko komoditas dapat berasal baik dari posisi *trading book* maupun posisi *banking book*, sedangkan risiko ekuitas berasal dari posisi *trading book*. *Assets & Liabilities Committee* (ALCO) merupakan komite yang membantu Direksi dalam mengawasi dan mengelola risiko pasar.

Risiko pasar melekat pada aktivitas fungsional Bank seperti kegiatan *treasury* dan investasi dalam bentuk efek-efek dan pasar uang maupun penyertaan pada lembaga keuangan lainnya, penyediaan dana dan pinjaman, kegiatan pendanaan dan penerbitan surat utang, serta kegiatan pembiayaan perdagangan. Untuk itu, Bank harus dan selalu melakukan identifikasi dan pemantauan dari waktu ke waktu untuk mengantisipasi adanya risiko pasar. LFR (*Loan to Funding Ratio*) Bank pada tanggal 31 Desember 2023 dan 2022 masing-masing adalah sebesar 50,55% dan 81,08%.

45. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets (continued)

Key assumptions and judgments in determining expected credit loss (continued)

Sensitivity of MEV to ECL

The ECL calculation relies on multiple variables and is inherently non-linear and portfolio-dependent, which implies that no single analysis can fully demonstrate the sensitivity of the expected credit loss to changes in the MEVs. The Bank believes that sensitivity should be performed to all variables, instead of single variable, as this aligns with the multi-variable nature of the ECL calculation.

A sensitivity analysis of ECL was undertaken to explore the effect of the global COVID-19 pandemic that leads to Indonesia economy slowdown.

Market risk

Market risk is the risk on the statements of financial position and administrative accounts, including derivative transactions, due to overall changes in market conditions, including the risk of change of option price. Market risk include, among others, interest rate risk, foreign exchange risk, equity risk and commodity risk. Interest rate risk, foreign exchange risk and commodity risk can come from trading book and banking book, whereas equity risk come from trading book. Assets & Liabilities Committee (ALCO) is a committee assisting Directors in monitoring and maintaining market risk.

Market risk is adhered on functional activities of the Bank such as treasury activity and investment in securities and money market or investment in other financing institution, funding and lending, funding activity and issued obligation and financing trading activity. The Bank must and always identify and monitor from time to time to anticipate the market risk. The Loan to Funding Ratio (LFR) of the Bank as of December 31, 2023 and 2022 are 50.55% and 81.08% respectively.

45. MANAJEMEN RISIKO (lanjutan)

Risiko pasar (lanjutan)

Tujuan dari manajemen risiko pasar adalah untuk melakukan identifikasi, pengukuran, pengendalian, dan pengelolaan eksposur risiko pasar dalam parameter yang dapat diterima, serta memaksimalkan tingkat pengembalian. Hal ini dilakukan melalui kebijakan yang komprehensif dan kerangka limit untuk mengidentifikasi, mengukur, dan memantau nilai risiko berdasarkan tingkat risiko yang akan diambil (*risk appetite*) oleh Bank.

Dalam melakukan pengukuran risiko pasar, Bank menggunakan perhitungan Metode Standar untuk menghitung Kewajiban Penyediaan Modal Minimum (KPMM) untuk risiko pasar.

Risiko tingkat suku bunga

Risiko tingkat suku bunga timbul dari adanya kemungkinan bahwa perubahan tingkat suku bunga akan mempengaruhi arus kas masa depan dari nilai wajar instrumen keuangan.

Dalam rangka meminimalkan risiko tingkat suku bunga, Bank melakukan upaya-upaya sebagai berikut, antara lain:

- Meningkatkan fungsi dan peran *Assets & Liabilities Committee* (ALCO) dalam rangka identifikasi dan penetapan tingkat suku bunga pinjaman dan dana pihak ketiga untuk mengantisipasi fluktuasi suku bunga pasar.

- Penerapan Kebijakan *Assets & Liabilities Management* (ALMA) untuk pihak berelasi dalam penerapan manajemen risiko Bank dan merupakan salah satu pedoman bagi unit kerja *Treasury* dalam melakukan transaksi di pasar uang dan pasar modal seperti:

  i. Melakukan identifikasi risiko tingkat suku bunga yang berasal dari transaksi dan portofolio Bank pada Efek-efek;

  ii. Penetapan sistem pengukuran risiko tingkat suku bunga dengan menggunakan *gap analysis* atau *duration analysis*; dan

  iii. Strategi penanaman dana dan strategi pengumpulan dana.

45. RISK MANAGEMENT (continued)

Market risk (continued)

The objective of market risk management is to identify, measure, control, and manage market risk exposures within acceptable parameters, while optimising the returns. This is done through a comprehensive policy and limit framework to indentify, measure, and monitor the amount of risk based on risk appetite of the Bank.

In measuring market risk, the Bank uses the Standardised Method in calculating Capital Adequacy Ratio (CAR) for market risk.

Interest rate risk

Interest rate risk arise from the possibility that changes in interest rates will affect future cash flows or the fair values of financial instruments.

To minimise interest rate risk, the Bank makes the following efforts, among others:

- *Increasing function and role of Assets & Liabilities Committee (ALCO) in identifying and determining interest rate and third party funds to anticipate fluctuations in market interest rate.*

- *Application of Assets & Liabilities Management's (ALMA) policy to related parties in application of risk management of the Bank and it is one of a guidance for Treasury working unit in money market and capital market transactions such as:*

  i. Identifying interest rate risk from transaction and Bank's portfolio of securities;

  ii. Determining measuring system of interest rate risk using gap analysis or duration analysis; and

  iii. Strategies of investment and collection of funds.

45. MANAJEMEN RISIKO (lanjutan) / *45. RISK MANAGEMENT (continued)*

Risiko pasar (lanjutan) / ***Market risk (continued)***

Risiko tingkat suku bunga (lanjutan) / *Interest rate risk (continued)*

Tabel berikut merupakan kisaran tingkat suku bunga kontraktual per tahun untuk aset dan liabilitas keuangan yang signifikan untuk tahun yang berakhir pada tanggal 31 Desember 2023 dan 2022:

The following table summarises the range of contractual interest rates per annum for significant financial assets and liabilities for the years ended December 31, 2023 and 2022:

	31 Desember/*December 31*,		
	2023	**2022**	
Aset			***Assets***
Giro pada bank lain	0,00% - 0,25%	0,00% - 1,30%	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	5,20% - 6,45%	4,75% - 5,10%	*Placements with Bank Indonesia and other banks*
Efek-efek	4,95% - 11,00%	4,20% - 10,25%	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	6,25% - 6,35%	5,50% - 5,80%	*Securities purchased under resale agreements*
Pinjaman yang diberikan, pembiayaan dan piutang syariah	1,00% - 20,00%	1,00% - 21,55%	*Loans, sharia financing and receivables*
Liabilitas			***Liabilities***
Simpanan nasabah	0,00% - 8,20%	0,00% - 7,00%	*Deposits from customers*
Simpanan dari bank lain	0,00% - 6,50%	0,00% - 6,00%	*Deposits from other banks*
Efek-efek yang diterbitkan	9,25% - 11,75%	10,30%	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	6,25% - 6,35%	5,80%	*Securities sold under repurchase agreements*

Sensitivitas terhadap laba bersih / *Sensitivity to net income*

Tabel di bawah ini mengikhtisarkan sensitivitas laba bersih Bank pada tanggal 31 Desember 2023 dan 2022 atas perubahan tingkat suku bunga (tidak diaudit):

The following table summarises the sensitivity of Bank's net income to movement of interest rates on December 31, 2023 and 2022 (unaudited):

	31 Desember/*December 31*, 2023		
	Peningkatan dalam 100 basis poin/ *Increase by 100 basis point*	**Penurunan dalam 100 basis poin/ *Decrease by 100 basis point***	
Pengaruh terhadap laba bersih	5.841.118	(5.841.118)	*Impact to net income*

	31 Desember/*December 31*, 2022		
	Peningkatan dalam 100 basis poin/ *Increase by 100 basis point*	**Penurunan dalam 100 basis poin/ *Decrease by 100 basis point***	
Pengaruh terhadap laba bersih	7.380.239	(7.380.239)	*Impact to net income*

45. MANAJEMEN RISIKO (lanjutan)

Risiko pasar (lanjutan)

Risiko tingkat suku bunga (lanjutan)

Proyeksi di atas mengasumsikan bahwa tingkat suku bunga bergerak pada jumlah yang sama, sehingga tidak mencerminkan pengaruh potensial laba atas perubahan beberapa tingkat suku bunga sementara yang lainnya tidak berubah. Proyeksi juga mengasumsikan bahwa seluruh variabel lainnya adalah konstan dan berdasarkan tanggal pelaporan yang konstan serta seluruh posisi hingga jatuh tempo.

Risiko mata uang

Bank memiliki eksposur risiko mata uang akibat adanya transaksi dalam valuta asing. Bank memonitor risiko konsentrasi yang terjadi untuk setiap valuta sehubungan dengan penjabaran transaksi dalam valuta asing ke dalam aset dan liabilitas moneter dalam Rupiah.

Pengelolaan posisi valuta asing Bank dilakukan dengan cara mengendalikan Posisi Devisa Neto ("PDN") Bank secara keseluruhan.

45. RISK MANAGEMENT (continued)

Market risk (continued)

Interest rate risk (continued)

The projection above assumes that interest rates of all maturities move by the same amount and, therefore, do not reflect the profit potential impact on the changes of some interest rates while others remain unchanged. The projections also assume that all other variables are held constant and based on a constant reporting date position and that all positions run to maturity.

Currency risk

The Bank is exposed to currency risk through transaction in foreign currencies. The Bank monitors any concentration risk in relation to any individual currency in regard to the translation of foreign currency transactions into monetary assets and liabilities in Rupiah.

The Bank's foreign currency position management is conducted by managing the Bank's overall Net Open Position ("NOP").

	31 Desember/*December 31*, 2023			
Valuta	**Aset/ *Assets***	**Liabilitas/ *Liabilities***	**Posisi Devisa Neto (nilai absolut)/ *Net Open Position (absolute amount)***	***Currencies***
Keseluruhan (laporan posisi keuangan dan rekening administratif)				*Aggregate (statements of financial position and administrative accounts)*
Dolar Amerika Serikat	697.540.237	710.115.633	12.575.396	*United States Dollar*
Yen Jepang	2.678.392	2.576.994	101.398	*Japanese Yen*
Dolar Singapura	1.759.234	1.903.038	143.804	*Singapore Dollar*
Yuan China	1.464.889	-	1.464.889	*Chinese Yuan*
Euro Eropa	1.084.572	1.551.542	466.970	*European Euro*
Dolar Australia	171.699	-	171.699	*Australian Dollar*
Poundsterling Inggis	26.300	-	26.300	*Great Britain Poundsterling*
Dolar New Zealand	22.851	-	22.851	*New Zealand Dollar*
Dolar Taiwan	7.704	-	7.704	*New Taiwan Dollar*
Swiss Franc	7.869	-	7.869	*Swiss Franc*
Dolar Hongkong	5.892	-	5.892	*Hongkong Dollar*
Won Korea	1.497	-	1.497	*Korean Won*
Riyal Saudi	1.437	-	1.437	*Riyal Saudi*
Dolar Kanada	581	-	581	*Canadian Dollar*
Baht Thailand	571	-	571	*Thailand Baht*
Ringgit Malaysia	436	-	436	*Malaysian Ringgit*
Total			14.999.294	***Total***
Jumlah ekuitas			3.839.922.636	*Total equity*
Rasio PDN			**0,39%**	***NOP Ratio***

45. MANAJEMEN RISIKO (lanjutan)

Risiko likuiditas

Risiko likuiditas merupakan risiko akibat ketidakmampuan Bank memenuhi kewajiban yang jatuh tempo dari sumber pendanaan arus kas dan/atau dari aset likuid berkualitas tinggi yang dapat diagunkan, tanpa mengganggu aktivitas dan kondisi keuangan Bank. Ketidakmampuan memperoleh sumber pendanaan arus kas sehingga menimbulkan risiko likuiditas dapat disebabkan antara lain oleh:

a. Ketidakmampuan menghasilkan arus kas yang berasal dari aset produktif maupun yang berasal dari penjualan aset termasuk aset likuid; dan/atau
b. Ketidakmampuan menghasilkan arus kas yang berasal dari penghimpunan dana dan transaksi antar Bank.

Risiko likuiditas berhubungan dengan adanya kemungkinan Bank tidak dapat memenuhi kewajibannya terhadap deposan, investor atau kreditur yang diantaranya disebabkan dari keterbatasan akses pendanaan atau ketidakmampuan Bank untuk melikuidasi aset yang dimiliki dengan harga yang wajar. *Assets and Liabilities Committee* (ALCO) merupakan komite yang membantu Direksi dalam mengawasi dan mengelola risiko likuiditas.

Secara umum, tujuan utama manajemen risiko untuk risiko likuiditas adalah untuk meminimalkan kemungkinan ketidakmampuan Bank dalam memperoleh sumber pendanaan arus kas. Dengan demikian Bank dapat memenuhi setiap kewajiban keuangan yang sudah diperjanjikan secara tepat waktu, dan agar senantiasa dapat memelihara tingkat likuiditas yang memadai dan optimal.

Kebijakan pengelolaan risiko likuiditas antara lain mencakup pengawasan aktif Dewan Komisaris dan Direksi, yang pada intinya mengatur penerapan Manajemen Risiko likuiditas pada Bank, Kebijakan Manajemen Risiko likuiditas yang secara umum mencakup strategi manajemen risiko likuiditas, tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) dan Sistem Informasi Manajemen Risiko serta Sistem Pengendalian Internal dengan menerapkan pengendalian internal dan kaji ulang independen yang memadai terhadap penerapan Manajemen Risiko untuk Risiko likuiditas yang dilaksanakan oleh Satuan Kerja Audit Internal (SKAI) dan Satuan Kerja Manajemen Risiko (SKMR).

45. RISK MANAGEMENT (continued)

Liquidity risk

Liquidity risk is the risk arising from the inability of the Bank to meet the maturing obligations from cash flow funding sources and/or from high-quality liquid assets that can be pledged, without disturbing the activities and financial condition of the Bank. The inability to obtain funding for cash flows resulting to liquidity risk can be contributed by:

a. Inability to generate cash flows from productive assets as well as from the sale of assets, including liquid assets; and/or

b. Inability to generate cash flows from funding and interbank transactions.

Liquidity risk related with the possibility of Bank's inability to meet the maturing obligations to its customers, investors or creditors in which due to the limitation of funding line or inability of the Bank to liquidate its assets with the fair value. Assets and Liabilities Committee (ALCO) is a commitee under Director who monitor and manage liquidity risk.

In general, the main purpose of liquidity risk management is to minimise the possibility of the Bank's inability to obtain sources of financing. Thus the Bank can fulfill any financial obligations as they fall due in a timely manner, and in order to maintain an adequate and optimal level of liquidity.

Liquidity risk management policies include the active supervision of the Board of Commissioners and Board of Directors, which basically set the implementation of the Bank's Liquidity Risk Management, Liquidity Risk Management Policy which generally include liquidity risk management strategy, the level of risk to be taken (risk appetite) and risk tolerance (risk tolerance) and Information Systems Risk Management and Internal Control System by implementing internal control and review of appropriate independent of the implementation of Risk Management for liquidity risk is carried out by the Internal Audit (SKAI) and Risk Management Unit (SKMR).

45. MANAJEMEN RISIKO (lanjutan)

Risiko likuiditas (lanjutan)

Tujuan dari manajemen risiko likuiditas adalah untuk memastikan bahwa setiap kebutuhan dana di saat ini maupun di masa datang baik untuk kondisi normal maupun kondisi stres dapat dipenuhi.

Bank mengelola risiko likuiditas melalui analisis perbedaan jatuh tempo likuiditas dan rasio-rasio likuiditas. Risiko likuiditas diukur dan dipantau secara harian berdasarkan kerangka kerja limit risiko likuiditas. Analisis kesenjangan likuiditas memberikan pandangan terhadap ketidaksesuaian arus kas masuk dengan arus kas keluar pada waktu tertentu. Kondisi ini dikelola secara terpusat oleh Tresuri yang mempunyai akses dan otorisasi secara langsung ke *interbank market*, *wholesale* dan *professional market* lainnya, dalam upaya membantu aktivitas utama bisnis Bank seperti pengumpulan dana dan pemberian pinjaman.

Langkah yang diambil oleh Bank sehubungan dengan perbedaan antara aset dan liabilitas keuangan yang jatuh tempo antara 1 (satu) sampai dengan 3 (tiga) bulan, adalah meningkatkan pelayanan kepada nasabah simpanan, memantau perpanjangan simpanan, mencari nasabah baru serta menawarkan produk dan bunga yang menarik kepada nasabah untuk menjaga stabilitas dan kontinuitas jumlah simpanan dari nasabah. Di samping itu, Bank juga mengintensifkan usaha penagihan kepada debitur bermasalah dan menempatkan kelebihan dana pada efek-efek yang memiliki pasar sehingga dapat dicairkan setiap saat apabila Bank membutuhkan dana.

Tabel jatuh tempo berikut ini menyajikan informasi mengenai perkiraan jatuh tempo dari liabilitas sesuai arus kas kontraktual yang tidak didiskontokan tanggal 31 Desember 2023 dan 2022:

45. RISK MANAGEMENT (continued)

Liquidity risk (continued)

The objective of liquidity risk management is to ensure that current and future fund requirements can be met both in normal or stress condition.

The Bank manages liquidity risk through liquidity gap analysis and liquidity ratios. Liquidity risk is measured and monitored on a daily basis based on liquidity risk limit framework. Liquidity gap analysis provides insight as to the mismatch of expected cash inflows against cash outflows on any given day. This is centrally managed within Treasury which has direct and authorised access to interbank, wholesale and other professional markets, to supplement core Bank activities such as deposit taking and lending.

The steps taken by the Bank in connection with the maturity gap mismatch between its financial assets and liabilities due in 1 (one) to 3 (three) months such as improving its services to customers, monitor the extension of deposit, search for new customers and offering services including attractive products and interest rates in order to maintain stability and continuity of deposits from customers. In addition, the Bank also intensify collection efforts from non-performing debtors and placing excess funds on marketable securities so they can be withdrawn at any time as the Bank needs a fund.

The maturity tables below provide information about maturities on contractual undiscounted cash flows of liabilities on December 31, 2023 and 2022:

	31 Desember/ *December 31,* 2023							
	Jumlah/ *Total*	Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ *No contractual maturity/ Repayable on demand*	≤ 1 bulan/ *≤ 1 month*	> 1 bulan-3 bulan/ *> 1 month 3 months*	> 3 bulan-1 tahun/ *> 3 months 1 year*	> 1 - 5 tahun/ *> 1 - 5 years*	Lebih dari 5 tahun/ *More than 5 years*	
Liabilitas								***Liabilities***
Simpanan nasabah	22.688.095.000	5.366.287.229	8.801.219.060	4.427.579.482	3.703.009.229	390.000.000	-	*Deposits from customers*
Simpanan dari bank lain	1.105.227.338	261.365.349	816.024.281	24.768.125	3.069.583	-	-	*Deposits from other banks*
Efek-efek yang diterbitkan	1.717.750.004	-	-	-	52.750.000	1.665.000.004	-	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	644.675.834	-	644.675.834	-	-	-	-	*Securities sold under repurchase agreements*
Liabilitas lain-lain	160.229.698	-	102.398.239	-	10.521.933	47.309.526	-	*Other liabilities*
	26.315.977.874	**5.627.652.578**	**10.364.317.414**	**4.452.347.607**	**3.769.350.745**	**2.102.309.530**	**-**	

45. MANAJEMEN RISIKO (lanjutan)

Risiko likuiditas (lanjutan)

Tabel jatuh tempo berikut ini menyajikan informasi mengenai perkiraan jatuh tempo dari liabilitas sesuai arus kas kontraktual yang tidak didiskontokan tanggal 31 Desember 2023 dan 2022: (lanjutan)

45. RISK MANAGEMENT (continued)

Liquidity risk (continued)

The maturity tables below provide information about maturities on contractual undiscounted cash flows of liabilities on December 31, 2023 and 2022: (continued)

	31 Desember/ *December 31,* 2022							
	Jumlah/ *Total*	Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ *No contractual maturity/ Repayable on demand*	≤ 1 bulan/ *≤ 1 month*	> 1 bulan-3 bulan/ *> 1 month 3 months*	> 3 bulan-1 tahun/ *> 3 months 1 year*	> 1 - 5 tahun/ *> 1 - 5 years*	Lebih dari 5 tahun/ *More than 5 years*	
Liabilitas								***Liabilities***
Simpanan nasabah	19.371.837.637	5.532.105.602	7.383.867.327	3.515.512.381	2.940.352.327	-	-	*Deposits from customers*
Simpanan dari bank lain	1.334.952.620	255.498.102	1.033.000.000	46.454.518	-	-	-	*Deposits from other banks*
Efek-efek yang diterbitkan	1.051.903.552	-	-	-	199.720.232	852.183.320	-	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	240.865.160	-	240.865.160	-	-	-	-	*Securities sold under repurchase agreements*
Liabilitas lain-lain	127.766.009	-	73.958.949	-	20.706.772	33.100.288	-	*Other liabilities*
	22.127.324.978	**5.787.603.704**	**8.731.691.436**	**3.561.966.899**	**3.160.779.331**	**885.283.608**	**-**	

Tabel berikut ini menyajikan informasi mengenai perkiraan *cash outflow* dari rekening administratif pada tanggal 31 Desember 2023 dan 2022:

The tables below provide information about estimated cash outflow of off-balance sheet as of December 31, 2023 and 2022:

	31 Desember/ *December 31,* 2023							
	Jumlah/ *Total*	Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ *No contractual maturity/ Repayable on demand*	Kurang dari/ *Less than* 1 bulan/*month*	1 – 3 bulan/ *months*	3 – 12 bulan/ *months*	1 – 5 tahun/ *years*	Lebih dari 5 tahun/ *More than 5 years*	
Fasilitas pinjaman yang belum digunakan	5.297.647.138	-	1.020.187.729	955.965.602	2.403.674.105	561.174.934	356.644.768	*Unused loan facilities*
Letter of credit	60.563.964	-	37.759.837	-	22.804.127	-	-	*Letter of credits*
Garansi yang diterbitkan	982.802.950	-	3.362.103	115.034.847	855.733.903	8.672.097	-	*Guarantees issued*
Jumlah	**6.341.014.052**	**-**	**1.061.309.669**	**1.071.000.449**	**3.282.212.135**	**569.847.031**	**356.644.768**	***Total***

	31 Desember/ *December 31,* 2022							
	Jumlah/ *Total*	Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ *No contractual maturity/ Repayable on demand*	Kurang dari/ *Less than* 1 bulan/*month*	1 – 3 bulan/ *months*	3 – 12 bulan/ *months*	1 – 5 tahun/ *years*	Lebih dari 5 tahun/ *More than 5 years*	
Fasilitas pinjaman yang belum digunakan	4.033.693.802	-	644.368.921	339.019.681	3.041.353.700	8.951.500	-	*Unused loan facilities*
Letter of credit	18.705.728	-	-	-	-	18.705.728	-	*Letter of credits*
Garansi yang diterbitkan	347.627.606	-	40.022.563	25.496.815	281.160.828	947.400	-	*Guarantees issued*
Jumlah	**4.400.027.136**	**-**	**684.391.484**	**364.516.496**	**3.322.514.528**	**28.604.628**	**-**	***Total***

Risiko operasional

Risiko operasional adalah risiko kerugian yang langsung ataupun tidak langsung yang terjadi karena tidak memadainya atau karena adanya kegagalan proses internal, kesalahan manusia, kegagalan sistem, dan/atau adanya kejadian-kejadian eksternal yang mempengaruhi operasional Bank.

Operational risk

Operational risk is the risk of direct or indirect loss resulting from inadequate or failure in internal processes, people and systems and/or from external problems that affect the Bank's operations.

45. MANAJEMEN RISIKO (lanjutan)

Risiko likuiditas (lanjutan)

Risiko ini melekat dalam semua proses bisnis, kegiatan operasional, sistem dan produk Bank, dari mulai Kantor Pusat sampai Kantor Kas. Kegagalan mengelola risiko operasional dapat menyebabkan kerugian keuangan, keselamatan karyawan dan reputasi Bank hingga akhirnya mempengaruhi kecukupan modal Bank. Tujuan Bank dalam mengelola risiko operasional adalah meminimalisasi dampak kegagalan atau ketidakcukupan proses internal, faktor manusia, sistem atau kejadian-kejadian eksternal yang dapat mempunyai dampak kerugian.

Bank menerapkan manajemen risiko operasional dengan sasaran memastikan bahwa Bank telah melakukan proses manajemen risiko yang meliputi identifikasi, penilaian, pengkajian, mitigasi risiko serta dilakukan pengawasan dan pelaporan atas pelaksanaannya. Hal tersebut dilakukan dengan tujuan akhir memaksimalkan *benefit* dari suatu produk/layanan atau proses transaksi/aktivitas dengan potensi atas risiko operasional yang telah diperhitungkan.

Proses pengkajian risiko dilakukan untuk menilai kecukupan pengendalian internal serta proses identifikasi dan penelaahan risiko untuk setiap proses dan produk di masing-masing unit kerja untuk memastikan kepatuhan terhadap kebijakan, peraturan dan batasan-batasan yang dibuat oleh manajemen Bank. Pengelolaan risiko operasional juga dilakukan dengan memperkuat aspek keamanan dan kehandalan operasi dari teknologi informasi sehingga kesalahan manusia, *fraud*, kesalahan proses dan potensi kegagalan sistem yang dapat menyebabkan terganggunya kelangsungan bisnis dapat ditekan dan diantisipasi lebih dini.

Dalam pemantauan risiko operasional, fungsi Satuan Kerja Audit Internal (SKAI) melaksanakan penilaian terhadap penerapan kebijakan dan prosedur manajemen risiko pada setiap aktivitas fungsional, produk atau layanan baru dan Satuan Kerja Manajemen Risiko (SKMR) memastikan proses identifikasi, pengukuran, pemantauan dan pengendalian risiko berjalan dengan efektif pada setiap aktivitas fungsional, produk atau layanan baru.

Pengawasan oleh Dewan Komisaris dan Direksi Bank atas profil risiko Bank dan pelaksanaan manajemen risiko dilakukan melalui rapat yang dilakukan secara berkala dengan jadwal yang telah ditentukan.

45. RISK MANAGEMENT (continued)

Liquidity risk (continued)

This type of risk is inherent in all business processes, operational activities, systems and products of the Bank, from Head Office to Cash Office. Failure to manage operational risks properly could lead to financial losses, loss of employee safety, and reputation of the Bank until affected capital adequacy of the Bank. The Bank's objective in managing operational risk is to minimise the impact of the failure or inadequate internal process, people, system or from external events, which could have financial loss impact.

The Bank applies the operational risk management with the main target to ensure that the Bank has conducted a risk management process that includes risk identification, risk assessment, risk evaluation, risk mitigation and conducted monitoring and reporting on implementation. This is done with the ultimate target to maximise the benefits of a product/service or process transactions/activities with potential operational risks that have been taken into account.

A risk assessment process is carried out to evaluate the adequacy of internal control and risk identification and assessment in every process and product in each working unit to ensure compliance with the policies, rules and limits set down by the Bank's management. Operational risk management is also performed by strengthening security and operational aspects of information technology so that human error, fraud, processing errors and system failure that can affect business continuity can be anticipated and reduced.

In monitoring operational risk, the Internal Audit (SKAI) conducted an assessment of the implementation of risk management policies and procedures in each functional activity, new products or services and Risk Management Unit (SKMR) function ensures the identification, measurement, monitoring and risk control work effectively on any functional activity, new products or services.

Monitoring by the Bank's Boards of Commissioners and Director actively monitor of the Bank's risk profile and its risk management implementation through meeting that are conducted regularly.

45. MANAJEMEN RISIKO (lanjutan)

Risiko operasional (lanjutan)

Selain kebijakan dan metode tersebut di atas, Bank juga telah menerapkan upaya yang terus menerus dikembangkan untuk membangun lingkungan budaya yang mendukung pelaksanaan manajemen risiko operasional. Hal tersebut dilakukan melalui penguatan pada tiga lini pertahanan (*three line of defense*) yaitu pemberdayaan unit bisnis sebagai lini pertahanan pertama, pembentukan fungsi manajemen risiko operasional sebagai lini pertahanan kedua dan koordinasi kerja dengan Internal Audit (SKAI) sebagai lini pertahanan ketiga.

Risiko hukum

Risiko hukum adalah risiko akibat tuntutan hukum dan/atau kelemahan aspek yuridis. Kelemahan aspek yuridis tersebut antara lain disebabkan adanya ketiadaan peraturan perundang-undangan yang mendukung atau kelemahan perikatan seperti tidak dipenuhinya syarat sahnya kontrak dan pengikatan dokumen yang tidak sempurna.

Sebagai sebuah perusahaan yang berdiri dalam yuridiksi hukum Indonesia, Bank harus selalu tunduk terhadap segala peraturan hukum yang dikeluarkan oleh regulator industri perbankan di Indonesia. Selain itu, Bank juga harus mengikuti segala bentuk peraturan perundangan yang berlaku di masyarakat baik yang terkait secara langsung maupun tidak langsung dengan kegiatan usaha Bank. Kegagalan Bank dalam mengikuti peraturan hukum yang berlaku dapat mengakibatkan pada timbulnya tuntutan hukum yang akan ditujukan kepada Bank. Apabila tuntutan-tuntutan hukum yang diajukan kepada Bank memiliki nilai yang material, maka hal tersebut dapat memberikan dampak secara langsung terhadap kinerja keuangan Bank.

Bank melaksanakan identifikasi risiko hukum berdasarkan beberapa faktor-faktor yang meliputi tuntutan hukum, tidak adanya peraturan regulasi hukum yang mendukung, dan kelemahan perjanjian. Pengendalian risiko hukum dilakukan Bank dengan memastikan bahwa seluruh kegiatan dan hubungan kerja dengan pihak ketiga telah didasarkan pada aturan maupun persyaratan yang dapat melindungi kepentingan Bank dari segi hukum termasuk antisipasi terhadap potensi tuntutan dari pihak eksternal.

45. RISK MANAGEMENT (continued)

Operational risk (continued)

Other than policy and the above mentioned method, the Bank has continued developing its culture and support the implementation for operational risk. The three line of defense implementation, which consist of unit business as the first line of defense, establishment of operational risk management as second line of defense and coordination with Internal Audit (SKAI) as third line of defense.

Legal risk

Legal risk is the risk related to legal claims and/or weaknesses in the juridical aspect. Such weaknesses in legal aspect is caused, among others, by the lack of the supporting legislation or the weaknesses of contracts such as incomplete requirements for a valid contract and imperfect document contract.

As an entity which is governed by the laws of the Republic of Indonesia, the Bank should always comply with all such laws and regulations issued by the regulator in the banking industry in Indonesia. In addition, the Bank should also follow all prevailing rules and regulations in the society whether directly or indirectly related with the business activities conducted by the Bank. Failure by the Bank to comply with such prevailing laws and regulations may give rise to legal claims against the Bank. If legal claims against the Bank are material in amounts, then it may directly affect the Bank's financial performance.

Bank implements legal risk identification based on several factors include lawsuits, lack of rule or law that supports the regulation and the weakness of the agreement. The Bank performed legal risk control to ensure that all activities and working relationships with third parties have been based on the rules and requirements that can protect the Bank's interests from legal terms including the anticipation of potential demands from external parties.

45. MANAJEMEN RISIKO (lanjutan)

Risiko hukum (lanjutan)

Untuk memitigasi risiko hukum yang mungkin timbul akibat tuntutan hukum atau kelemahan dari aspek hukum, Bank memiliki Biro Hukum. Biro tersebut memiliki peranan:

1) melakukan analisis hukum atas produk dan aktivitas baru serta membuat standar dokumen hukum yang terkait dengan produk dan aktivitas baru tersebut;
2) memberikan analisis/pendapat hukum;
3) memberikan pendapat atas eksposur hukum akibat perubahan ketentuan atau peraturan;
4) memeriksa segala perjanjian yang akan dibuat antara Bank dengan pihak ketiga; dan
5) melakukan pemeriksaan berkala atas perjanjian yang telah dibuat.

Dengan adanya biro tersebut, maka kebijakan hukum dan standar dokumen hukum yang terkait dengan produk atau fasilitas perbankan yang ditawarkan oleh Bank kepada masyarakat dimana kebijakan hukum dan standar dokumen hukum dimaksud dibuat dengan mengacu kepada ketentuan peraturan perundangan yang berlaku serta memperhatikan kepentingan aspek hukum dari Bank.

Selain itu, Biro Hukum juga memiliki bagian Litigasi untuk menangani setiap permasalahan hukum yang terkait dengan litigasi agar risiko hukum yang mungkin timbul dapat diminimalisir seminimum mungkin.

Pengelolaan risiko hukum dilakukan dengan memantau perkembangan kasus-kasus hukum yang terjadi dan mengambil pembelajaran dari kasus-kasus tersebut. Penanganan kasus hukum yang dilakukan pada Bank senantiasa memperhitungkan potensi kerugian.

Risiko reputasi

Risiko reputasi adalah risiko akibat menurunnya tingkat kepercayaan *stakeholder* yang bersumber dari persepsi negatif terhadap Bank. Risiko ini melekat dalam setiap kegiatan yang dilakukan oleh Bank. Kegagalan Bank dalam menjaga reputasinya di mata masyarakat dapat menimbulkan pandangan maupun persepsi negatif masyarakat terhadap Bank. Apabila risiko ini dihadapi oleh Bank, maka dalam waktu singkat dapat terjadi penurunan atau hilangnya kepercayaan nasabah terhadap Bank yang pada akhirnya akan memberikan dampak negatif terhadap pendapatan dan volume aktivitas Bank.

45. RISK MANAGEMENT (continued)

Legal risk (continued)

To mitigate the possible legal risk caused by legal claims or weaknesses in legal aspects, the Bank has a General Legal Counsel Bureau. Such division has the following functions:

1) to provide legal analysis on new product and activity and prepare standard legal document related with such new product and activity;
2) to provide legal analysis/advice;
3) to provide advice on legal exposure due to change of laws or regulations;
4) to review any contracts between the Bank and third party; and
5) to conduct a periodical review on contracts which have been executed.

Based on the bureau above, legal policy and legal document standards related to the product or banking facilities offered by the Bank to public, whereby the legal policy and legal document standards are intentionally made in accordance with the prevailing laws and regulations also considering the interests in the legal aspect of the Bank.

In addition, the General Legal Counsel Bureau also has a Litigation division to handle every legal case related to litigation so that the possible legal risk can be minimised as minimum as possible.

The legal risk is also conducted by monitoring the development of legal cases and take lesson learnt principle from those cases. The management of legal cases conducted by the Bank is calculating potential loss at all time.

Reputation risk

Reputation risk is the risk related to the decreasing level of stakeholder's confidence arising from the negative perception on the Bank. Reputation risk is inherent in every activity conducted by the Bank. The Bank 's failure to protect its reputation in the public's eye may result in negative view as well as perception by the public towards the Bank. If the Bank faces this risk, then in the short run, the Bank may lose the customer's trust that will ultimately result in a negative impact to the Bank 's income and volume of activities.

45. MANAJEMEN RISIKO (lanjutan)

Risiko reputasi (lanjutan)

Risiko reputasi dapat berdampak langsung pada berkurangnya kepercayaan nasabah sehingga jumlah nasabah ataupun pendapatan Bank menurun. Dalam mengelola risiko reputasi, Bank berupaya untuk menjaga reputasi dengan memberikan pelayanan terbaik dalam menangani keluhan dan memberikan kepuasan kepada nasabah untuk menghindari munculnya keluhan tersebut di media.

Corporate Secretary setiap hari melakukan pengawasan atas pemberitaan media untuk memantau publikasi negatif atau keluhan nasabah yang muncul di media. Sedangkan pengawasan atas keluhan nasabah yang disampaikan langsung ke Bank dilakukan oleh *Group Quality Service* untuk kemudian ditindaklanjuti penyelesaiannya.

Untuk pemberitaan negatif dan keluhan nasabah yang muncul di media selanjutnya dibuatkan klarifikasi dan tanggapan sesuai dengan langkah yang akan ditempuh Bank. Upaya mitigasi risiko reputasi juga dilakukan saat Bank meluncurkan produk/layanan/program baru dengan menganalisis risiko reputasi yang mungkin timbul dan bagaimana mengantisipasi risiko tersebut. Demikian pula, untuk informasi yang material atau yang penting untuk diketahui oleh nasabah, *Corporate Secretary* juga menyiapkan panduan untuk para *frontliner* dan *spokespersons* agar mereka bisa menjelaskan informasi tersebut secara benar dan proporsional kepada nasabah.

Risiko stratejik

Risiko stratejik adalah risiko akibat ketidaktepatan dalam pengambilan dan/atau penerapan suatu keputusan stratejik serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Ketidakmampuan Bank dalam melakukan penyusunan strategi yang tepat dapat menimbulkan kegagalan bisnis Bank di masa yang akan datang.

Risiko ini juga mencakup kemampuan Bank dalam meningkatkan daya saing dan menciptakan keunggulan kompetitif Bank di tengah kompetisi perbankan yang semakin ketat. Ketidakmampuan Bank dalam menghadapi tantangan bisnis yang terus mengalami perubahan dari waktu ke waktu akan mengakibatkan kegagalan bagi Bank untuk mencapai visi yang selama ini telah ditetapkan.

45. RISK MANAGEMENT (continued)

Reputation risk (continued)

Reputational risks can have a direct impact on the decreasing of customer confidence as a result the number of customers or the Bank's income decreased. In managing reputation risk, the Bank seeks to maintain a reputation for providing the best service to handle complaints and provide satisfaction to customers to avoid the appearance of such complaints in media.

The Corporate Secretary performs a daily media monitoring of the news to observe negative publications or customer's complaints which appear in the media. The monitoring of customer's complaints which are submitted directly to the Bank is performed by the Group Quality Service for follow up action to resolve.

For negative news publication and customer's complaints which appear in the media, a clarification and appropriate response will be conducted in accordance with the steps undertaken by the Bank. Efforts to mitigate the reputation risk are also undertaken everytime when the Bank launches a new product/service/program by analysing the possibility of reputation risk that may arise and how to anticipate such risk. Moreover, for material or important information to be known by the customer, the Corporate Secretary also prepares guidelines for frontliners and spokespersons so that they are able to explain the information correctly and proportionately to customers.

Strategic risk

Strategic risk is the risk due to inaccuracy in deciding and/or implementing a strategic decision as well as the failure in anticipating the changes in the business environment. Failure in formulating the right strategy may deteriorate the Bank's business in the future.

This risk also includes the Bank's ability to develop its competitiveness and create a Bank's competitiveness edge amidst the stiff competition in the banking industry. The inability of Bank to cope with such business challenges which are constantly changing from time to time will lead Bank to failure to accomplished determined vision.

45. MANAJEMEN RISIKO (lanjutan)

Risiko reputasi (lanjutan)

Bank mengelola risiko stratejik melalui proses pertimbangan dan pengambilan keputusan secara komprehensif dan kolektif di lingkungan komite-komite pengawasan dan eksekutif, yang turut mempengaruhi dan berdampak pada langkah-langkah bisnis yang akan diambil dalam kerangka kebijakan dan arah yang telah ditetapkan oleh Bank.

Risiko kepatuhan

Risiko kepatuhan merupakan risiko akibat Bank tidak mematuhi dan/atau tidak melaksanakan peraturan perundang-undangan dan ketentuan yang berlaku. Dalam menjalankan kegiatan usaha pada industri Perbankan, Bank diwajibkan untuk selalu tunduk terhadap peraturan perbankan yang diterbitkan baik oleh Pemerintah, Bank Indonesia maupun Otoritas Jasa Keuangan (OJK).

Pada umumnya, risiko kepatuhan melekat pada Bank sebagai sebuah lembaga perbankan, seperti: risiko kredit terkait dengan ketentuan Kewajiban Penyediaan Modal Minimum (KPMM); Penilaian Kualitas Aset; Pembentukan Cadangan Kerugian Penurunan Nilai (CKPN); Batas Maksimum Pemberian Kredit (BMPK); penerapan tata kelola yang baik (*GCG*) dan risiko lain yang terkait dengan ketentuan tertentu termasuk peraturan OJK dan Bank Indonesia yang relevan. Ketidakmampuan Bank untuk mengikuti dan mematuhi seluruh peraturan perundangan yang terkait dengan kegiatan usaha Bank dapat berdampak terhadap kelangsungan usaha Bank.

Risiko kepatuhan dapat bersumber dari perilaku hukum, yaitu perilaku atau aktivitas Bank yang menyimpang atau melanggar dari ketentuan dan/atau peraturan perundang-undangan serta perilaku organisasi, yaitu perilaku atau aktivitas Bank yang menyimpang atau bertentangan dari standar yang berlaku secara umum.

Wujud penerapan manajemen risiko kepatuhan antara lain dengan mewujudkan terlaksananya budaya kepatuhan pada seluruh kegiatan usaha Bank di setiap jenjang organisasi, menilai dan mengevaluasi kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan dan peraturan yang berlaku, memantau atas pelaksanaan prinsip kehati-hatian Bank.

45. RISK MANAGEMENT (continued)

Reputation risk (continued)

The Bank manages strategic risks through a comprehensive and collective consideration and decision-making processes encompassing areas of the supervisory and executive committee that influence and impact business decisions on policies and directions that the Bank will embark on.

Compliance risk

Compliance risk is the risks resulting from the failure of the Bank in fulfilling and/or implementing the prevailing laws and regulations. In engaging in the banking industry services, the Bank is required to always comply with the banking regulations issued by the Government, Central Bank and Financial Services Authority (OJK).

In general, the compliance risk is embedded in the Bank as a banking institution, such as: credit risks related to Capital Adequacy Ratio (CAR) regulations; Assessment of Assets Quality; Allowance for Impairment Losses (CKPN); Legal Lending Limit (LLL); Good Corporate Governance (GCG) and other risks related to certain regulations including OJK and Central Bank relevant regulations. The inability of the Bank to follow and comply with all laws and regulations related to the Bank's business activities may affect the continuity of the Bank's operation.

Compliance risk may arise from legal behavior, which is the Bank's behavior or activity that deviates from or violates the provisions and/or laws and regulations, as well as organizational behavior, which is the Bank's behavior or activity that deviates from or in contrary to the generally accepted standards.

The implementation of compliance risk management, among others, is by achieving the implementation of compliance culture at all of the Bank's business activities at every organizational level, assessing and evaluating the adequacy and conformity of the Bank's policies, regulations, systems, and procedures against the applicable provisions and regulations, monitoring the implementation of the Bank's prudential principles.

45. MANAJEMEN RISIKO (lanjutan)

Risiko kepatuhan (lanjutan)

Bank melakukan identifikasi dan pengelolaan risiko kepatuhan sejak awal dengan memberikan bantuan kepada unit bisnis dan unit operasional dalam hal pengembangan produk dan aktivitas baru dan secara aktif melakukan penilaian terhadap kebijakan Pedoman dan Prosedur Internal yang dimiliki oleh Bank untuk memastikan bahwa seluruh peraturan eksternal telah diakomodir sedemikian rupa dan selanjutnya untuk dipatuhi dalam pelaksanaannya.

46. NILAI WAJAR INSTRUMEN KEUANGAN

Aset dan liabilitas keuangan yang diukur pada nilai wajar menggunakan hierarki nilai wajar sebagai berikut:

i. Tingkat 1: input yang berasal dari harga kuotasian (tanpa penyesuaian) di pasar aktif untuk instrumen yang identik yang dapat diakses Bank pada tanggal pengukuran.

ii. Tingkat 2: input selain harga kuotasian yang termasuk dalam level 1 yang dapat diobservasi, baik secara langsung atau tidak langsung. Dalam kategori ini termasuk instrumen yang dinilai dengan menggunakan: harga kuotasian untuk instrumen yang serupa di pasar aktif; harga kuotasian untuk instrumen yang identik atau yang serupa di pasar yang tidak aktif; atau teknik penilaian lainnya dimana seluruh input signifikan dapat diobservasi secara langsung maupun tidak langsung dari data pasar.

iii. Tingkat 3: input yang tidak dapat diobservasi. Dalam kategori ini termasuk semua instrumen dimana teknik penilaian menggunakan input yang tidak dapat diobservasi dan input yang tidak dapat diobservasi ini memberikan dampak signifikan terhadap penilaian instrumen. Termasuk dalam kategori ini adalah instrumen yang dinilai berdasarkan harga kuotasian untuk instrumen serupa yang memerlukan penyesuaian atau asumsi signifikan yang tidak dapat diobservasi untuk mencerminkan perbedaan diantara instrumen tersebut.

45. RISK MANAGEMENT (continued)

Compliance risk (continued)

The Bank implements early detection and management of compliance risks by providing assistance to business and operational units and new product and new activity and also evaluated the Bank's Guidelines and Procedures to ensure that all external regulations have been accommodated and implemented correctly.

46. FAIR VALUE OF FINANCIAL INSTRUMENTS

The financial assets and liabilities measured at fair value use the following fair value hierarchy:

i. Level 1: inputs that are quoted prices (unadjusted) in active markets for identical instruments that the Bank can access at the measurement date.

ii. Level 2: inputs other than quoted prices included within level 1 that are observable either directly or indirectly. This category includes instruments valued using: quoted market prices in active markets for similar instruments; quoted market prices in active markets for similar instruments; quoted prices for identical or similar instruments in markets that are not active; or other valuation techniques in which all significant inputs are directly or indirectly observable from market data.

iii. Level 3: inputs that are unobservable. This category includes all instruments for which the valuation technique includes inputs not based on observable data and the unobservable inputs have a significant effect on the instrument's valuation. This category includes instruments that are valued based on quoted prices for similar instruments for which significant unobservable adjustments or assumptions are required to reflect differences between the instruments.

46. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan) / *46. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)*

Tabel berikut menyajikan instrumen keuangan Bank yang diukur sebesar nilai wajar:

The following table presents the Bank's financial instruments that are measured at fair value:

	31 Desember/ *December 31,* 2023				
	Tingkat 1/ *Level 1*	**Tingkat 2/ *Level 2***	**Tingkat 3/ *Level 3***	**Jumlah/ *Total***	
Aset keuangan					***Financial assets***
Efek-efek	1.328.291.579	1.097.502.547	-	2.425.794.126	*Marketable securities*
Penyertaan saham	-	-	0*)	0*)	*Investment in shares*
Jumlah	**1.328.291.579**	**1.097.502.547**	**-**	**2.425.794.126**	***Total***

*) nilai wajar saham PT Bima Multi Finance adalah sebesar Rp1 (dalam nilai penuh)

*) fair value of shares in PT Bima Multi Finance are Rp1 (in full amount)

	31 Desember/ *December 31,* 2022				
	Tingkat 1/ *Level 1*	**Tingkat 2/ *Level 2***	**Tingkat 3/ *Level 3***	**Jumlah/ *Total***	
Aset keuangan					***Financial assets***
Efek-efek	593.209.954	1.565.738.441	-	2.158.948.395	*Marketable securities*
Penyertaan saham	-	-	31.877.279	31.877.279	*Investment in shares*
Jumlah	**593.209.954**	**1.565.738.441**	**31.877.279**	**2.190.825.674**	***Total***

Tidak terdapat perpindahan antara tingkat 1 dan tingkat 2 hierarki nilai wajar.

There is no transfer between level 1 and level 2 of fair value hierarchy.

Tabel berikut ini menyajikan perubahan pada instrumen keuangan Bank yang diukur dengan tingkat 3 - hierarki nilai wajar untuk tahun yang berakhir pada 31 Desember 2023 dan 2022.

The following table presents the changes in Bank's financial instruments measured at level 3 - fair value hierarchy for the year ended December 31, 2023 and 2022.

	31 Desember/*December 31,* 2023				
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Kerugian yang diakui pada laba rugi/ *Loss recognised in profit or loss***	**Jumlah/ *Total***	
Aset keuangan					***Financial assets***
Penyertaan saham	31.877.279	-	(31.877.279)	-	*Investment in shares*

	31 Desember/*December 31,* 2022				
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Kerugian yang diakui pada laba rugi/ *Loss recognised in profit or loss***	**Jumlah/ *Total***	
Aset keuangan					***Financial assets***
Penyertaan saham	34.886.943	-	(3.009.664)	31.877.279	*Investment in shares*

Pada tanggal 31 Desember 2023, Bank melakukan penilaian kembali atas nilai pasar 100% Ekuitas PT Bima Multi Finance. Berdasarkan laporan dari penilai Independen KJPP Tri, Santi dan Rekan yang ditandatangani oleh Santi Dewiyani, MAPPI (Cert.) pada tanggal 8 Desember 2023. Nilai wajar dari penyertaan saham sementara ditentukan menggunakan laporan keuangan per 30 September 2023 dengan pendekatan aset metode *Adjusted Book Value* (ABV) dan asumsi tingkat diskon likuiditas pasar sebesar 30%.

As of December 31, 2023, the Bank reassessed the market value of 100% Equity of PT Bima Multi Finance. Based on Independent Appraisal report from the independent appraiser KJPP Tri, Santi and Associates signed by Santi Dewiyani, MAPPI (Cert.) on December 8, 2023. The fair value of the temporary share investment was determined using the financial statements as of September 30, 2023 with an asset approach using the Adjusted Book Value (ABV) method and assumption the discount for lack of marketability of 30%.

46. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan)

Pada tanggal 31 Desember 2022 nilai wajar dari penyertaan saham sementara di PT Bima Multi Finance ditentukan dengan menggunakan model arus kas yang didiskontokan dengan tingkat diskonto sebesar 11,15% dan 7,65% yang dihasilkan melalui analisa atas kinerja historis pada periode tahun 2014 - 2021 serta proyeksi kinerja yang dibuat oleh Manajemen PT Bima Multi Finance untuk periode tahun 2022 - 2027 berdasarkan rencana bisnis untuk masa yang akan datang yang telah disesuaikan untuk menghasilkan arus kas bersih untuk periode tahun 2022 - 2027.

Tabel berikut merangkum informasi kuantitatif mengenai asumsi signifikan yang tidak dapat diobservasi (tingkat 3) yang digunakan dalam pengukuran nilai wajar penyertaan saham sementara pada PT Bima Multi Finance.

46. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

As of December 31, 2022 the fair value of of temporary investment in shares in PT Bima Multi Finance is determined using a discounted cash flow model with a discount rate of 11.15% and 7.65% generated through analysis of historical performance in the period of 2014 - 2021 and the performance projections made by the Management of PT Bima Multi Finance for the period 2022 - 2027 based on adjusted future business plans to generate net cash flow for the period 2022 - 2027.

The following table summarises the quantitative information about the significant unobservable assumptions (level 3) used in the fair value measurements of temporary investment in shares in PT Bima Multi Finance.

	Rentang Input/*Range of Input* **31 Desember/*December 31,* 2022**	
Tingkat diskonto	11,15%	*Discount rate*
Tingkat diskon likuiditas pasar	0,00%	*Discount for lack of marketability*
Suku bunga kontraktual	40,00%	*Contractual interest rate*
Rata-rata pembiayaan per unit	Rp10.443	*Average financing per unit*
Rata-rata tertimbang kenaikan Penjualan per tahun	17,70%	*Weighted average of increment in sales per year*
Tingkat kolektibilitas angsuran	72,00%-91,00%	*Collection rate for installment*

Input utama tingkat 3 yang digunakan oleh Bank didapatkan dan dievaluasi sebagai berikut:

- Tingkat diskonto ditentukan menggunakan biaya ekuitas. Semakin tinggi nilai diskonto, semakin rendah nilai wajar.
- Tingkat diskon likuiditas pasar adalah suatu jumlah atau persentase tertentu yang merupakan pengurang dari nilai suatu ekuitas sebagai cerminan dari kurangnya likuiditas objek penilaian. Semakin tinggi nilai diskon likuiditas pasar, semakin rendah nilai wajar.
- Suku bunga kontraktual adalah suku bunga yang tercatat pada kontrak pembiayaan PT Bima Multi Finance. Semakin tinggi nilai suku bunga kontraktual, semakin tinggi nilai wajar.
- Rata-rata pembiayaan per unit adalah rata-rata nilai kontrak pembiayaan di PT Bima Multi Finance. Semakin tinggi nilai rata-rata pembiayaan per unit, semakin tinggi nilai wajar.

The main level 3 inputs used by the Bank are derived and evaluated as follows:

- *Discount rate is determined using cost of equity. The higher the discount rate, the lower the fair value.*
- *The discount for lack of marketability is a certain amount or percentage which is a deduction from the value of an equity as a reflection of the lack of liquidity of the valued bbject. The higher the discount for lack of marketability, the lower the fair value.*
- *Contractual interest rate is the interest rate recorded in the financing contract of PT Bima Multi Finance. The higher the contractual interest rate, the higher the fair value.*
- *Average financing per unit is the average value of the financing contract at PT Bima Multi Finance. The higher the average value of financing per unit, the higher the fair value.*

46. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan)

Input utama tingkat 3 yang digunakan oleh Bank didapatkan dan dievaluasi sebagai berikut: (lanjutan)

- Rata-rata tertimbang kenaikan penjualan per tahun ditentukan berdasarkan kinerja historis pada periode tahun 2014 - 2021 serta proyeksi kinerja yang dibuat oleh Manajemen PT Bima Multi Finance untuk periode tahun 2022 - 2027 berdasarkan rencana bisnis untuk masa yang akan datang. Semakin tinggi nilai rata-rata tertimbang kenaikan penjualan per tahun, semakin tinggi nilai wajar.
- Tingkat kolektibilitas angsuran ditentukan berdasarkan kinerja historis pada periode tahun 2014 - 2021 serta proyeksi kinerja yang dibuat oleh Manajemen PT Bima Multi Finance untuk periode tahun 2022 - 2027 berdasarkan rencana bisnis untuk masa yang akan datang. Semakin tinggi tingkat kolektibilitas angsuran, semakin tinggi nilai wajar.

Tabel di bawah ini menyajikan perbandingan antara nilai tercatat dan nilai wajar dari aset dan liabilitas keuangan yang tidak diukur pada nilai wajar. Nilai wajar yang diungkapkan adalah berdasarkan informasi relevan yang tersedia pada tanggal 31 Desember 2023 dan 2022, dan tidak diperbaharui untuk mencerminkan perubahan dalam kondisi pasar yang telah terjadi setelah tanggal ini.

46. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

The main level 3 inputs used by the Bank are derived and evaluated as follows: (continued)

- *The weighted average sales increase per year is determined based on historical performance in the period 2014 - 2021 and the performance projections made by the Management of PT Bima Multi Finance for the period 2022 - 2027 based on future business plans. The higher the weighted average value of sales increases per year, the higher the fair value.*
- *The installment collectibility level is determined based on historical performance in the period 2014 - 2021 and performance projections made by the Management of PT Bima Multi Finance for the period 2022 - 2027 based on future business plans. The higher the installment rate, the higher the fair value.*

The table below summarises the comparison between the carrying amounts and fair values of all financial assets and liabilities except those measured at fair value. The fair values disclosed are based on relevant information available as of December 31, 2023 and 2022, and are not updated to reflect changes in market conditions which have occurred after these dates.

	31 Desember/*December 31,* 2023		
	Nilai tercatat/ *Carrying value*	**Nilai wajar/ *Fair value***	
Aset Keuangan			***Financial Assets***
Kas	92.820.864	92.820.864	*Cash*
Giro pada Bank Indonesia	1.493.076.850	1.493.076.850	*Current accounts with Bank Indonesia*
Giro pada bank lain	296.297.193	296.297.193	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain - bersih	915.368.748	915.368.748	*Placements with Bank Indonesia and other banks - net*
Efek-efek - bersih	3.851.497.641	3.856.960.471	*Marketable securities - net*
Efek-efek yang dibeli dengan janji dijual kembali - bersih	636.732.554	633.930.554	*Securities purchased under resale agreements*
Pendapatan bunga dan syariah yang masih akan diterima	368.407.923	368.407.923	*Interest and sharia income receivables*
Pinjaman yang diberikan, pembiayaan dan piutang kembali - bersih	18.053.870.975	18.043.073.004	*Loans, sharia financing and receivables - net*
Tagihan akseptasi	12.474.839	12.474.839	*Acceptance receivables*
Aset lain-lain	23.076.537	23.076.537	*Other assets*
Jumlah aset keuangan	**25.743.624.124**	**25.735.486.983**	***Total financial assets***
Liabilitas Keuangan			***Financial Liabilities***
Simpanan nasabah	22.429.180.492	22.429.180.492	*Deposits from customers*
Simpanan dari bank lain	1.104.803.359	1.104.803.359	*Deposits from other banks*
Efek-efek yang diterbitkan	1.347.639.528	1.382.811.890	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	643.266.730	643.266.730	*Securities sold under repurchase agreement*
Utang akseptasi	11.959.811	11.959.811	*Acceptance payables*
Akrual dan liabilitas lain-lain	160.229.698	160.229.698	*Accruals and other liabilities*
Jumlah liabilitas keuangan	**25.697.079.618**	**25.732.251.980**	***Total financial liabilities***

46. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan)

46. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

	31 Desember/*December 31,* 2022		
	Nilai tercatat/ ***Carrying value***	**Nilai wajar/** ***Fair value***	
Aset Keuangan			***Financial Assets***
Kas	51.897.124	51.897.124	*Cash*
Giro pada Bank Indonesia	1.506.565.848	1.506.565.848	*Current accounts with Bank Indonesia*
Giro pada bank lain	228.384.427	228.384.427	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain - bersih	858.327.515	858.327.515	*Placements with Bank Indonesia and other banks - net*
Efek-efek - bersih	2.650.742.054	2.349.677.241	*Marketable securities - net*
Efek-efek yang dibeli dengan janji dijual kembali - bersih	839.432.375	831.423.125	*Securities purchased under resale agreements*
Pendapatan bunga dan syariah yang masih akan diterima	391.679.779	391.679.779	*Interest and sharia income receivables*
Pinjaman yang diberikan, pembiayaan dan piutang kembali - bersih	15.286.492.840	15.241.740.231	*Loans, sharia financing and receivables - net*
Tagihan akseptasi	7.754.446	7.754.446	*Acceptance receivables*
Aset lain-lain	29.246.923	29.246.923	*Other assets*
Jumlah aset keuangan	**21.850.523.331**	**21.496.696.659**	***Total financial assets***
Liabilitas Keuangan			***Financial Liabilities***
Simpanan nasabah	19.371.837.637	19.371.837.637	*Deposits from customers*
Simpanan dari bank lain	1.334.952.620	1.334.952.620	*Deposits from other banks*
Efek-efek yang diterbitkan	1.051.903.552	1.072.026.260	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	240.865.160	240.865.160	*Securities sold under repurchase agreement*
Akrual dan liabilitas lain-lain	127.766.009	127.766.009	*Accruals and other liabilities*
Jumlah liabilitas keuangan	**22.127.324.978**	**22.147.447.686**	***Total financial liabilities***

Metode dan asumsi yang digunakan untuk estimasi nilai wajar adalah sebagai berikut:

a. Efek-efek

Nilai wajar untuk efek-efek yang diukur pada biaya perolehan diamortisasi ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (*broker*)/pedagang efek (*dealer*) (tingkat 1 - hierarki nilai wajar). Jika informasi ini tidak tersedia, nilai wajar diestimasi dengan menggunakan harga pasar kuotasi efek yang memiliki karakteristik kredit, jatuh tempo dan *yield* yang serupa (tingkat 2 - hierarki nilai wajar).

b. Pinjaman yang diberikan

Pinjaman yang diberikan dinyatakan berdasarkan jumlah nilai tercatat setelah dikurangi oleh beban penurunan nilai. Estimasi nilai wajar dari pinjaman yang diberikan mencerminkan jumlah diskonto dari estimasi kini dari arus kas masa depan yang diharapkan akan diterima. Arus kas yang diharapkan didiskontokan pada tingkat suku bunga pasar terkini untuk menentukan nilai wajar (tingkat 3 - hierarki nilai wajar).

The methods and assumptions used to estimate fair value are as follows:

a. Marketable securities

The fair value for securities measured at amortised cost is based on market prices or broker/dealer price quotations (level 1 - fair value hierarchy). Where this information is not available, fair value is estimated using quoted market prices for securities with similar credit, maturity and yield characteristics (level 2 - fair value hierarchy).

b. Loans

Loans are recorded at carrying amount net of charges for impairment. The estimated fair value of loans represents the discounted amount of estimated future cash flows expected to be received. Estimated cash flows are discounted at current market rates to determine fair value (level 3 - fair value hierarchy).

46. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan)

Metode dan asumsi yang digunakan untuk estimasi nilai wajar adalah sebagai berikut: (lanjutan)

c. Efek-efek yang diterbitkan

Nilai wajar untuk efek-efek yang diukur pada biaya perolehan diamortisasi ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (*broker*)/pedagang efek (*dealer*) (tingkat 1 - hierarki nilai wajar). Nilai wajar agregat dihitung berdasarkan harga pasar kuotasi. Jika informasi ini tidak tersedia, model diskonto arus kas digunakan berdasarkan kurva *yield* terkini yang sesuai dengan sisa periode jatuh temponya (tingkat 2 - hierarki nilai wajar).

d. Sebagian besar dari instrumen keuangan yang tidak diukur pada nilai wajar, diukur pada biaya perolehan diamortisasi. Berikut daftar instrumen keuangan yang nilai tercatatnya mendekati nilai wajarnya, contohnya, instrumen keuangan jangka pendek atau yang ditinjau ulang menggunakan harga pasar secara berkala.

Aset Keuangan:
- Kas
- Giro pada Bank Indonesia
- Giro pada bank lain
- Penempatan pada Bank Indonesia dan bank lain
- Pendapatan bunga dan syariah yang masih akan diterima
- Tagihan akseptasi
- Aset lain-lain

Liabilitas Keuangan:
- Simpanan nasabah
- Simpanan dari bank lain
- Efek-efek yang dijual dengan janji dibeli kembali
- Utang akseptasi
- Akrual dan liabilitas lain-lain

47. MANAJEMEN MODAL

Tujuan utama dari kebijakan Bank atas kebijakan pengelolaan modal adalah untuk memastikan bahwa Bank memiliki modal yang kuat untuk mendukung strategi pengembangan ekspansi usaha Bank saat ini dan mempertahankan kelangsungan pengembangan di masa mendatang, dan untuk memenuhi ketentuan kecukupan permodalan yang ditetapkan oleh regulator serta memastikan agar struktur permodalan Bank telah efisien.

46. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

The methods and assumptions used to estimate fair value are as follows: (continued)

c. Securities issued

The fair value for securities issued measured at amortised cost based on market prices or broker/dealer price quotations (level 1 - fair value hierarchy). The aggregate fair values are calculated based on quoted market prices. For those notes where quoted market prices are not available, a discounted cash flow model is used based on a current yield curve appropriate for the remaining term to maturity (level 2 - fair value hierarchy).

d. Majority of the financial instrument not measured at fair value are measured at amortised cost. The following are financial instruments for which their carrying amount are reasonable approximation of fair value because, for example, they are short term in nature or re-price to current market rates frequently.

Financial Assets:
- *Cash*
- *Current accounts with Bank Indonesia*
- *Current accounts with other banks*
- *Placement with Bank Indonesia and other banks*
- *Interest and sharia income receivables*
- *Acceptance receivables*
- *Other assets*

Financial Liabilities:
- *Deposits from customers*
- *Deposits from other banks*
- *Securities sold under repurchase agreements*
- *Acceptance payable*
- *Accrued and other liabilities*

47. CAPITAL MANAGEMENT

The primary objectives of the Bank's capital management policy are to ensure that the Bank has a strong capital to support the Bank's business expansion strategy currently to sustain future development of the business, to meet regulator capital adequacy requirements and also to ensure the efficiency of Bank's capital structure.

47. MANAJEMEN MODAL (lanjutan)

Bank menyusun Rencana Permodalan berdasarkan penilaian dari penelaahan atas kebutuhan kecukupan permodalan yang dipersyaratkan dan mengkombinasikannya dengan tinjauan perkembangan ekonomi terkini. Bank senantiasa akan menghubungkan tujuan keuangan dan kecukupan modal terhadap risiko melalui proses perencanaan modal, begitu pula dengan bisnis yang didasarkan pada permodalan dan persyaratan likuiditas Bank.

Kebutuhan permodalan Bank juga direncanakan dan didiskusikan secara rutin yang didukung dengan data analisis.

Permodalan disusun oleh Direksi sebagai bagian dari Rencana Bisnis Bank dan disetujui oleh Dewan Komisaris. Perencanaan ini diharapkan akan memastikan tersedianya modal yang cukup dan terciptanya struktur permodalan yang optimal untuk mendukung strategi Bank.

Bank telah melakukan perhitungan kecukupan modal berdasarkan ketentuan Bank Indonesia yang berlaku, dimana modal yang dimiliki diklasifikasikan dalam 2 *Tier* yaitu Modal *Tier* I dan Modal *Tier* II.

Bank mematuhi semua persyaratan modal yang ditetapkan oleh pihak eksternal sepanjang periode pelaporan, khususnya berkenaan dengan perhitungan Kewajiban Penyediaan Modal Minimum (KPMM) dan Aktiva Tertimbang Menurut Risiko (ATMR).

Kewajiban penyediaan modal Bank dengan memperhitungkan risiko kredit, risiko operasional dan risiko pasar:

47. CAPITAL MANAGEMENT (continued)

The Bank undertakes Capital Planning based on assessment and review of the capital situation in terms of the legal capital adequacy requirement, combined with assessment of economic outlooks. The Bank will continue to link financial and capital adequacy goals to risk appetite through the capital planning process as well as assess the businesses based on the Bank's capital and liquidity requirements.

The capital needs of the Bank are also discussed and planned on a routine basis as supported by data analysis.

Capital Planning is prepared by Directors as part of the Bank's business plan and is approved by the Board of Commissioners. Capital Planning ensures that adequate levels of capital and an optimum mix of the different components of capital are maintained to support the Bank's strategy.

The Bank calculated its capital adequacy requirements using the prevailing Bank Indonesia regulation, where the regulatory capital is classified into 2 Tiers, mainly Tier I Capital and Tier II Capital.

The Bank has complied with all externally imposed capital requirements throughout the reporting period, particularly regarding Capital Adequacy Ratio (CAR) and calculation of Risk Weighted Assets (RWA).

The Bank's capital adequacy ratio with consideration for credit, operational and market risks:

	31 Desember/*December 31*,		
	2023	**2022**	
Modal inti (*Tier* I)	3.287.238.228	3.201.440.267	*Core Capital (Tier I)*
Modal pelengkap (*Tier* II)	532.853.302	674.675.196	*Supplementary Capital (Tier II)*
Jumlah Modal	3.820.091.530	3.876.115.463	*Total Capital*
Aset Tertimbang Menurut Risiko untuk Risiko Kredit	16.999.048.864	16.177.645.218	*Risk Weighted Assets for Credit Risk*
Aset Tertimbang Menurut Risiko untuk Risiko Operasional	1.466.732.341	984.238.535	*Risk Weighted Assets for Operational Risk*
Aset Tertimbang Menurut Risiko untuk Risiko Pasar	685.118.902	478.131.085	*Risk Weighted Assets for Market Risk*
Rasio Kewajiban Penyediaan Modal Minimum untuk risiko kredit dan risiko operasional	20,69%	22,59%	*Capital Adequacy Ratio (CAR) with credit and operational risks*
Rasio Kewajiban Penyediaan Modal Minimum untuk risiko kredit, risiko operasional dan risiko pasar	19,95%	21,97%	*Capital Adequacy Ratio (CAR) with credit, operational and market risks*
Rasio Kewajiban Penyediaan Modal Minimum yang diwajibkan	8,00%	8,00%	*Minimum Capital Adequacy Ratio required*

48. DIVESTASI ANAK PERUSAHAAN

Di bulan Desember 2022, Bank telah melakukan divestasi atas 80% kepemilikan di entitas anak, PT Bank Victoria Syariah atau sebanyak 288.000.000 lembar saham kepada PT Victoria Investama Tbk (pemegang saham utama) dengan harga jual sebesar nilai nominal saham dari entitas anak tersebut yaitu sebesar Rp288.000.000.

Nilai tercatat investasi pada entitas anak adalah sebesar Rp288.968.382 dan rugi dari divestasi sebesar Rp968.382 dicatat di akun tambahan modal disetor. Transaksi divestasi ini merupakan transaksi kombinasi bisnis entitas sepengendali, oleh karena itu dicatat sesuai dengan PSAK 38 "Kombinasi Bisnis Entitas Sepengendali". Setelah divestasi, kepemilikan Bank di PT Bank Victoria Syariah adalah 19,81% dan Bank memiliki pengaruh signifikan, oleh karena itu investasi di PT Bank Victoria Syariah dicatat dengan metode ekuitas.

Pada tanggal 22 Desember 2022, Bank telah mendapatkan persetujuan dari OJK atas divestasi tersebut melalui surat No. S-301/PB.101/2022 tertanggal 22 Desember 2022. Sejak tanggal 23 Desember 2022, PT Bank Victoria Syariah tidak lagi dikonsolidasikan ke dalam Laporan Keuangan Bank.

48. DIVESTMENT OF SUBSIDIARY

In December 2022, Bank has divested 80% ownership in subsidiary, PT Bank Victoria Syariah which was equivalent to 288,000,000 shares to PT Victoria Investama Tbk (majority shareholder) with selling price equivalent to the nominal value of investment in the subsidiary amounted to Rp288,000,000.

Carrying amount of investment in subsidiary amounted to Rp288,968,382 and loss from divestment of Rp968,382 was recorded in additional paid-in capital account. This divestment was business combination transaction between entities under common control, therefore it was recorded in accordance with SFAS 38 "Business Combination Under Common Control Entities". After divestment, Bank's ownership in PT Bank Victoria Syariah is 19.81% and Bank has significant influence, therefore the investment in PT Bank Victoria Syariah is recognized using equity method.

On December 22, 2022, the Bank has received approval from Financial Service Authority (OJK) for the divestment through letter No. S-301/PB.101/2022 dated December 22, 2022. Since December 23, 2022, PT Bank Victoria Syariah is no longer consolidated into Bank's Financial Statements.

49. STANDAR AKUNTANSI BARU

Standar akuntansi yang telah diterbitkan sampai tanggal penerbitan laporan keuangan Bank namun belum berlaku efektif diungkapkan berikut ini.

Mulai efektif pada atau setelah tanggal 1 Januari 2024

Pilar Standar Akuntansi Keuangan

Standar ini memberikan persyaratan dan pedoman bagi entitas untuk menerapkan standar akuntansi keuangan yang benar dalam menyusun laporan keuangan bertujuan umum. Akan ada 4 (empat) standar akuntansi keuangan yang saat ini diterapkan di Indonesia, yaitu:

1. Pilar 1 Standar Akuntansi Keuangan Internasional,
2. Pilar 2 Standar Akuntansi Keuangan Indonesia (PSAK),
3. Pilar 3 Standar Akuntansi Keuangan Indonesia untuk Entitas Swasta/Standar Akuntansi Keuangan Indonesia untuk Entitas Tanpa Akuntabilitas Publik, dan
4. Pilar 4 Standar Akuntansi Keuangan Indonesia untuk Entitas Mikro Kecil dan Menengah.

49. NEW ACCOUNTING STANDARD

The accounting standards that have been issued up to the date of issuance of the Bank's financial statements, but not yet effective are disclosed below.

Effective beginning on or after January 1, 2024

Financial Accounting Standards Pillars

These standards provides requirements and guidelines for entities to apply the correct financial accounting standards in preparing general purpose financial statements. There will be 4 (four) financial accounting standards that are currently applied in Indonesia, namely:

1. *Pillar 1 International Financial Accounting Standards,*
2. *Pillar 2 Indonesian Financial Accounting Standards (SFAS),*
3. *Pillar 3 Indonesian Financial Accounting Standards for Private Entities/Indonesian Financial Accounting Standards for Entities without Public Accountability, and*
4. *Pillar 4 Indonesian Financial Accounting Standards for Micro Small and Medium Entities.*

49. STANDAR AKUNTANSI BARU (lanjutan)

Mulai efektif pada atau setelah tanggal 1 Januari 2024 (lanjutan)

Standar Akuntansi Keuangan Internasional

Standar ini merupakan adopsi penuh dari International Financial Reporting Standards ("IFRS") yang diterjemahkan kata demi kata dan tidak ada modifikasi dari Standar IFRS, termasuk tanggal efektifnya. Entitas yang memenuhi persyaratan dapat menerapkan standar ini, sejak tanggal efektif.

Nomenklatur Standar Akuntansi Keuangan

Standar ini ini mengatur penomoran baru untuk standar akuntansi keuangan yang berlaku di Indonesia yang diterbitkan oleh DSAK IAI.

Amandemen PSAK 1: Liabilitas Jangka Panjang dengan Kovenan

Amandemen ini menentukan persyaratan untuk mengklasifikasikan suatu liabilitas sebagai jangka pendek atau jangka panjang dan menjelaskan:

- hal yang dimaksud sebagai hak untuk menangguhkan pelunasan,
- hak untuk menangguhkan pelunasan harus ada pada akhir periode pelaporan,
- klasifikasi tersebut tidak dipengaruhi oleh kemungkinan entitas akan menggunakan hak nya untuk menangguhkan liabilitas, dan
- hanya jika derivatif melekat pada liabilitas konversi tersebut adalah suatu instrumen ekuitas, maka syarat dan ketentuan dari suatu liabilitas konversi tidak akan berdampak pada klasifikasinya.

Selain itu, persyaratan telah diperkenalkan untuk mewajibkan pengungkapan ketika suatu kewajiban timbul dari pinjaman perjanjian diklasifikasikan sebagai tidak lancar dan hak entitas untuk menunda penyelesaian bergantung pada kepatuhan terhadap persyaratan di masa depan dalam waktu dua belas bulan.

Amandemen PSAK 73: Liabilitas Sewa dalam Jual Beli dan Sewa-balik

Amandemen PSAK 73 Sewa menetapkan persyaratan yang digunakan penjual-penyewa dalam mengukur kewajiban sewa yang timbul dalam transaksi jual beli dan sewa-balik, untuk memastikan penjual-penyewa tidak mengakui jumlah setiap keuntungan atau kerugian yang terkait dengan hak guna yang dipertahankan.

49. NEW ACCOUNTING STANDARD (continued)

Effective beginning on or after January 1, 2024 (continued)

International Financial Accounting Standard

This standard is a full-adoption of International Financial Reporting Standards ("IFRS") which is translated in a word-for-word basis and there is no modifications from IFRS Standards, including the effective date. Entities that meet the requirements can apply this standard, from the effective date.

Financial Accounting Standards Nomenclature

This standard regulates the new numbering for financial accounting standards applicable in Indonesia issued by DSAK IAI.

Amendment of SFAS 1: Non-current Liabilities with Covenants

The amendments specify the requirements for classifying liabilities as current or non-current and clarify:

- *what is meant by a right to defer settlement,*
- *the right to defer must exist at the end of the reporting period,*
- *classification is not affected by the likelihood that an entity will exercise its deferral right, and*
- *only if an embedded derivative in a convertible liability is an equity instrument would the terms and conditions of a liability will not impact its classification.*

In addition, a requirement has been introduced to require disclosure when a liability arising from a loan agreement is classified as non-current and the entity's right to defer settlement is contingent on compliance with future covenants within twelve months.

Amendment of SFAS 73: Lease liability in a Sale and Leaseback

The amendment to SFAS 73 Leases specifies the requirements that a seller-lessee uses in measuring the lease liability arising in a sale and leaseback transaction, to ensure the seller-lessee does not recognise any amount of the gain or loss that relates to the right of use it retains.

49. STANDAR AKUNTANSI BARU (lanjutan)

Mulai efektif pada atau setelah tanggal 1 Januari 2024 (lanjutan)

Amandemen PSAK 2 dan PSAK 60: Pengaturan Pembiayaan Pemasok

Amandemen PSAK 2 dan PSAK 60 mengklarifikasi karakteristik pengaturan pembiayaan pemasok dan mensyaratkan pengungkapan tambahan atas pengaturan pembiayaan pemasok tersebut. Persyaratan pengungkapan dalam amandemen ini dimaksudkan untuk membantu pengguna laporan keuangan dalam memahami dampak pengaturan pembiayaan pemasok terhadap liabilitas, arus kas, dan eksposur terhadap risiko likuiditas suatu entitas.

Dampak dari penerapan standar, amendemen/ penyesuaian, dan interpretasi tersebut terhadap laporan keuangan masih dalam proses evaluasi dan belum dapat ditentukan oleh manajemen.

49. NEW ACCOUNTING STANDARD (continued)

Effective beginning on or after January 1, 2024 (continued)

Amendment of SFAS 2 and SFAS 60: Supplier Finance Arrangements

The amendments to SFAS 2 and SFAS 60 clarify the characteristics of supplier finance arrangements and require additional disclosure of such arrangements. The disclosure requirements in the amendments are intended to assist users of financial statements in understanding the effects of supplier finance arrangements on an entity's liabilities, cash flows and exposure to liquidity risk.

The Company's management is currently evaluating and has not determined the effect of these SFAS amandements and improvements and ISAK to the financial statement.

bank victoria

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2023

Laporan Tahunan & Keberlanjutan
Annual & Sustainability Report